

MONEY IN POLITICS

**Analysis of financing
of the parliamentary political parties in Montenegro**



Impressum

TITLE:

Analysis of financing of the parliamentary political parties
in Montenegro

MONEY IN POLITICS

PUBLISHER:

Network for Affirmation of NGO Sector - MANS

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INTRODUCTION

This publication provides a unique insight into the financing of political parties in the Parliament of Montenegro. It presents an analysis of the official sources of revenues and expenses of regular operation of each party individually during 2019 and 2020. We pointed out the specific expenses of the campaign for parliamentary elections held in August 2020, hidden within the expenses of the regular operation of the parties, as well as the bills that have never been paid.

Political parties in the Parliament provide most of the funds for their operation from the state or municipal budgets, thus, they are obliged to act in accordance with the Law on Free Access to Information. Thanks to that, we collected significant data on the financing of the regular operation of the parties in the Parliament, as well as their election campaigns.

Based on years-long experience and cooperation with numerous international organisations, we have developed a unique methodology for scoring the transparency of financing of the political parties which is presented in this publication. Based on it, **we ranked the transparency of the financing of regular operation and election campaigns of each parliamentary political party.**

We analysed all financial statements and audit reports, as well as nearly 80,000 individual transactions of parties in the Parliament, in order to determine whether they **hid the expenses of the election campaign within the expenses for regular operation.** In this publication, we pointed out the **specific expenses due to which the parties increased their expenses in the year when the elections were held, especially during the election campaign.**

Not a single state institution checks whether political parties paid all reported campaign expenses. This leaves a huge space for hiding of donations, if suppliers write off debts of the parties, or they are paid by a third party. Even the postponement of the payment of expenses enables the parties a more favourable position in relation to those political entities that have to settle their liabilities within the agreed deadline. **In this publication, we reveal which parties did not pay significant expenses of the campaign for parliamentary elections held in 2020.**

*All collected data on the financing of political parties are available at the link:
<https://cistakampanja.me/transparentnost-finansijkog-poslovanja-partija/>.*



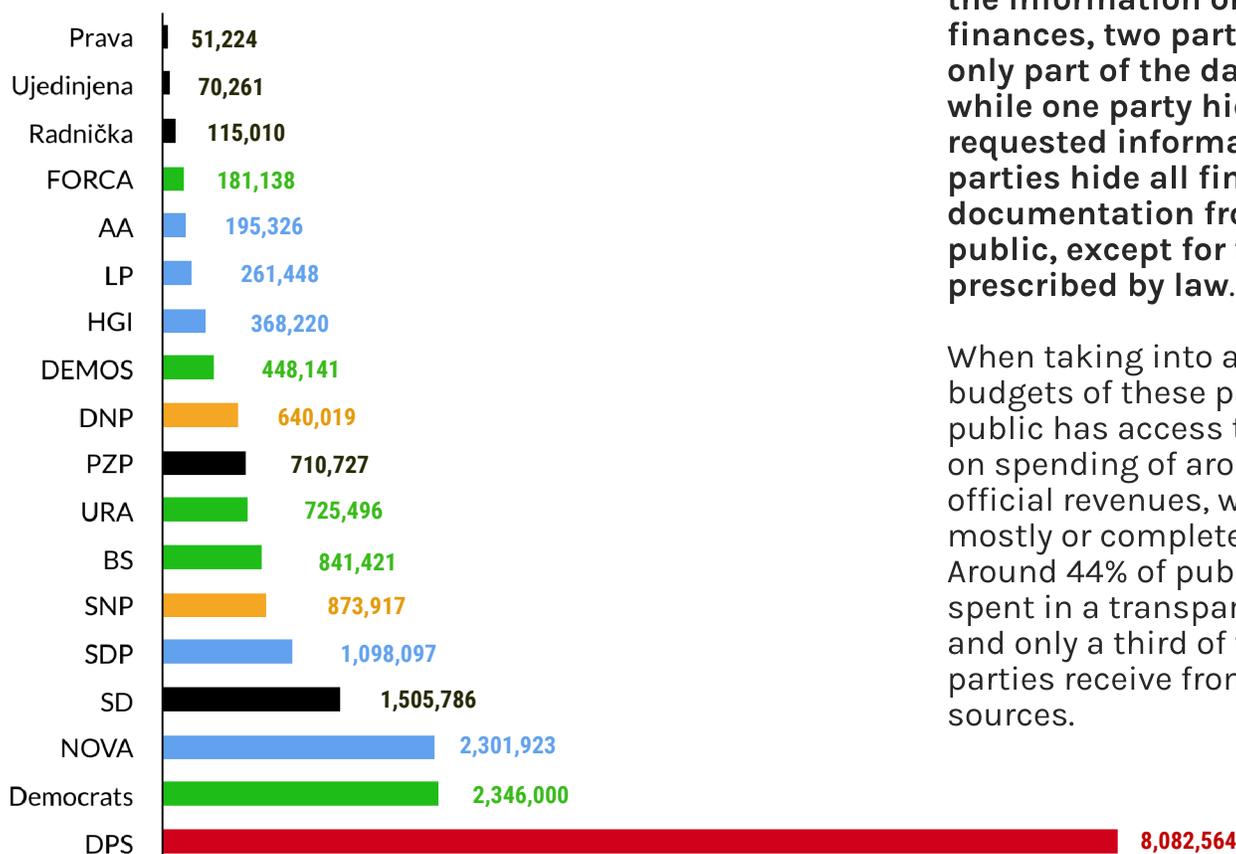
ABSTRACT

In two years, parliamentary parties have officially earned nearly 21 million euros, of which over 17 million from public funds.

20,816,716 € total official revenues of political parties in 2019 and 2020;

17,063,045 € total payments from state and municipal budgets to parliamentary parties in 2019 and 2020.

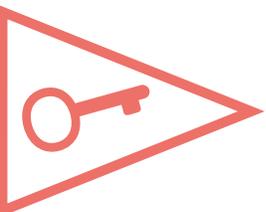
Transparency of financing and total revenues of parliamentary political parties (2019 and 2020)



Ten parliamentary political parties published all or most of the information on their finances, two parties made only part of the data available, while one party hid almost all requested information. Five parties hide all financial documentation from the public, except for the minimum prescribed by law.

When taking into account the budgets of these parties, the public has access to information on spending of around 42% of official revenues, while 58% is mostly or completely hidden. Around 44% of public funds are spent in a transparent manner and only a third of the funds that parties receive from private sources.

High Medium Low Very low No transparency



There are numerous indications that many political parties hid part of the campaign expenses for the parliamentary elections and paid them from the accounts for financing the regular operation, which is prohibited by law.

During the election campaign, many parties increased the expenses of the regular operation. It was the expenses that can be linked to the campaign that increased, such as advertising on social media, per diems, representation, promotional materials, public opinion polls and hiring of consulting or marketing agencies. Many parties did not mention these expenses in their official reports on election campaign financing, or they reported extremely small amounts.

The law prescribes penalties for parties that use funds from the account for regular operation to finance the campaign and do not report these expenses in a separate report.

Until the end of 2021, some parties did not pay large debts to foreign suppliers who provided them with services in the parliamentary elections campaign, from any official account.

Most parties paid for the election campaign expenses from a separate account opened for that purpose. Some closed it within the legally prescribed deadline, and then continued to pay expenses from the account for financing the regular operation.

After the elections, one coalition shared the unpaid expenses among the coalition members, which paid them from the account for regular operation. However, some members of that coalition did not pay over 300 thousand Euros of the campaign from any account for financing the regular operation, not even a year and a half after the elections. These are, among other things, significant debts for political marketing to the media from the abroad, as well as to a foreign company that produced promotional content.

Competent institutions do not control whether the parties pay the official expenses of the election campaigns, because that is not precisely prescribed by law, which leaves a huge space for abuses and hiding of donations from the country and abroad.

A. LEGAL FRAMEWORK



The Law on Financing of Political Entities and Election Campaigns [1] governs the manner of acquiring and providing of financial assets for regular operation and the election campaign of political entities.

Financing of the regular operation. The Law stipulates that political entities may acquire funds for regular operation and election campaigns from public and private sources. [2] Political entities are prohibited from raising more funds from private sources to finance regular operation than from public funds. [3]

Financing of the election campaign. The Law prescribes the maximum allowed amount of total election campaign expenses [4], as well as the maximum allowed amount of funds from private sources. [5] The funds which are collected to finance the election campaign may be used solely for covering the election campaign expenses. [6]

For the purpose of raising funds to finance the election campaign expenses, the political entity shall open a separate bank account. [7] All payments of election campaign expenses shall be carried out via that account, until the separate account is closed. [8]

Political entity shall close the separate bank account within 90 days from the day final election results are announced. [9] Before that, after settling all liabilities, the political entity shall transfer the unspent funds from the separate election account to its regular account. [10]

Election coalition. The total expenses incurred by the coalition shall also include the expenses of all individual political entities that submitted the list, from the start of the campaign to the date when the list is submitted. [11]

Funds intended for the financing of the coalition's election campaign are paid into the account of one political entity which shall be determined by the agreement of these political entities. [12] Funds paid by the members of the coalition, on the basis of a concluded mutual agreement, shall not be considered as contributions or income of the political entity that opened the bank account. [13]

[1] Official Gazette of Montenegro No. 3/2020 and 38/2020

[2] Article 4 of the Law on Financing of Political Entities and Election Campaigns. Article 6 stipulates that public sources are "the funds allocated from the Budget of Montenegro and budgets of local self-governing units", while the Article 7 stipulates that private sources are: "membership fees, contributions, income from legacies and loans from banks and other financial institutions in Montenegro".

[3] Article 15, paragraph 1

[4] Article 18, paragraph 2

[5] Article 23, paragraph 2

[6] Article 19, paragraph 1

[7] Article 24, paragraph 1

[8] Article 24, paragraph 3

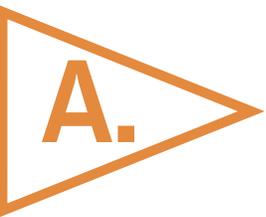
[9] Article 25, paragraph 1

[10] Article 17, paragraph 6

[11] Article 16, paragraph 2

[12] Article 24, paragraph 4

[13] Article 24, paragraph 5



Own funds. Political entities may decide to use the funds raised for regular operation of the political entity for the election campaign, but they shall be paid to a separate account for financing of the election campaign. [14] A fine shall be imposed on a political entity if funds from the regular account collected for regular operations are used for the election campaign without paying them into a separate account. [15]

Implementing bodies. Supervision over implementation of the Law on Financing of Political Entities and Election Campaigns shall be carried out by the Agency for Prevention of Corruption. [16]

The State Audit Institution shall audit the consolidated financial statements of political entities. [17] Over a four-year period, that institution shall audit the annual consolidated financial statements of all political entities with a parliamentary status at national and local levels. [18] Prior to the adoption of the new law, at the end of 2020, the State Audit Institution had the obligation to audit statements of all parliamentary political parties every year.

Transparency. Political entities shall submit special reports on the election campaign financing [19], on the contributions of legal and natural persons [20], as well as the statement of accounts and the consolidated financial statement. [21] These reports are available to the public on the website of the Agency for Prevention of Corruption. [22]

As already mentioned, parliamentary parties are prohibited from raising more funds from private sources than public sources. Therefore, they are reporting entities to the Law on Free Access to Information, which obliges them to respond to submitted requests within 15 days. [23]

[14] Article 17, paragraphs 1 and 2

[15] Article 66, paragraph 1, item 10

[16] Article 55, paragraph 1

[17] Article 55, paragraph 2

[18] Article 55, paragraph 3

[19] Article 50, paragraph 1

[20] Article 53, paragraph 1

[21] Article 48, paragraph 2

[22] Article 51 and Article 48, paragraph 6

[23] Article 9, paragraph 1, item 1, and Article 31, paragraph 1 of the Law on Free Access to Information.

B. METHODOLOGY



1. Data sources

What we requested from the parties

Based on the Law on Free Access to Information, we asked parliamentary political parties for statements from all bank accounts of the head office, the Women's Forum [24] and municipal boards, as well as from the accounts for financing campaigns for parliamentary and local elections in 2019 and 2020. [25] We also asked for all statements from foreign currency accounts and payment cards, as well as general ledgers of treasuries both of the head office and municipal boards.

In all cases where the parties did not provide the requested information, we submitted complaints to the Agency for Personal Data Protection and Free Access to Information. In the case when the Agency did not make decisions within the legally prescribed deadlines, we filed lawsuits to the Administrative Court due to administrative silence, which even earlier took the position upon our lawsuits that political parties are reporting entities to the Law on Free Access to Information.

The parties further complicated the data analysis by first submitting partial data and then supplementing them. No party provided us with data in a machine-readable format and we manually transferred all the information obtained into electronic form in order to analyse it. The balance on the account and the treasury, i.e. the number of statements from the bank account were used for verification, in order to ensure accurate data entry.

What we gathered from other sources

Audit reports of political parties compiled by the State Audit Institution (SAI) provided us with information on:

- bank account numbers of political parties;
- total revenues and expenses of political parties;
- the work of the treasury and operations of municipal boards of the parties.

Collecting of these data revealed that the detail of SAI audit reports is not uniform. [26]

In addition, we downloaded data from the financial statements of parties that are published on the website of the Agency for Prevention of Corruption (APC). [27] We also downloaded the official reports on the financing of election campaigns and bank account numbers of the parties that managed the finances and the separate bank account from the APC's website. From that source and from the website of the State Election Commission, we determined which party participated in which elections and in which coalition.

What information we already had

We have previously collected data on the financing of the campaign for 2020 parliamentary elections from most of the parties in the Parliament, which include contracts with suppliers and invoices. [28]

[24] Separate intra-party bodies formed for the purpose of voluntary organization of party members.

[25] Parties are required to open accounts for financing election campaigns.

[26] The detail of audit reports varies from party to party, thus, for example, in the case of the New Serb Democracy, they contain much more information than the report on the Democratic Party of Socialists.

[27] For example, in the statement, the Socialist People's Party cites bank account numbers they have opened in banks.

[28] These data are available at: <http://www.mans.co.me/finansijski-profil-izbori-2020/>.

B.

2. Transparency score of the financing

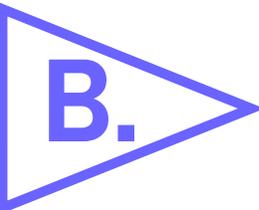
How we determined the transparency score of the parties' financial operations

For each party, we created a separate table in which we assessed the transparency of financial operations, compared to the data we received. Thus, the transparency of bank accounts, foreign currency accounts, payment cards and the general ledger of treasuries were assessed separately. Each of these data was assessed separately, for the party head office, the Women's Forum, municipal boards, but also in relation to individual election processes - parliamentary and local elections held in 2019 and 2020. Scores ranged from 0 to 5, where 0 means that the data were not submitted, and scores 1 to 5 assessed the scope and quality of the data obtained. [29] The final score on the transparency of individual parties was obtained through the processing of scores in the transparency table.

Type	Description	Bank accounts	Foreign currency accounts	Cards	Treasuries	Intermediate score	Score	Final score
Regular operation	Head office							
<i>quantitative</i>								
<i>qualitative</i>								
Regular operation	Women's Forum							
<i>quantitative</i>								
<i>qualitative</i>								
Regular operation	Municipal boards							
<i>quantitative</i>								
<i>qualitative</i>								
Parliamentary elections	2020 Elections							
<i>quantitative</i>								
<i>qualitative</i>								
Local elections	Kotor							
<i>quantitative</i>								
<i>qualitative</i>								
Local elections	Budva							
<i>quantitative</i>								
<i>qualitative</i>								
Local elections	Tivat							
<i>quantitative</i>								
<i>qualitative</i>								
Local elections	Tuzi							
<i>quantitative</i>								
<i>qualitative</i>								
Local elections	Andrijevisa							
<i>quantitative</i>								
<i>qualitative</i>								
Local elections	Gusinje							
<i>quantitative</i>								
<i>qualitative</i>								

Transparency score table template. Complete transparency scores of the parties can be found at: <https://cistakampanja.me/ocjene-transparentnosti-finansiranja-politickih-partija/>

[29] Ranking of party transparency based on scores: high - score 5, medium - score from 4 to 5, low - from 3 to 4, very low - from 1 to 2, no transparency - 0. More detailed information is given in Chapter C. Transparency of financing of the parliamentary political parties.

**B.****Score “0”.**

As already mentioned, from audit reports or financial statements of some parties which were somewhat more detailed, we determined whether the parties had treasuries, bank accounts of municipal boards, foreign currency accounts and payment cards. If the parties did not provide this information, while the audit reports indicated that it existed, they received a score of 0. However, for parties that did not have audit reports in the last two years, or did not provide details about any of this information (usually on foreign currency account), we would consider that the information did not exist if the parties informed us in writing about that in response to our requests. If the parties did not respond to that request and provided other information, the score was 0. [30]

While there is a possibility that parties do not have a foreign currency account, payment cards or a treasury, or operate exclusively through the head office without the involvement of municipal boards, all parties are required to have an account of the head office and the Women's Forum.

In every elections in which parties participate, they must have accounts for financing the election campaign, except when they are a part of the coalition. In that case, the parties agree on which of them will manage the finances, thus, the data on the financing of the elections are with the chosen party, while the other members of the coalition do not have that information. Therefore, these parties cannot get a transparency score of the financing of those elections.

Scoring criteria

Scores were given using two types of criteria by which we assessed the scope and quality of available data. In the first place, we compared the submitted inflow and outflow data with the information from the audit reports, if they were compiled and contained that information. We then determined whether all statements had been submitted on the basis of the ordinal number of the statement indicated.

After that, we assessed the quality of available data based on the information that was available on suppliers and creditors, i.e. cash transactions. Without data on who paid the funds to parties, we are not able to see the sources of their financing, and without data on suppliers, we cannot determine whether the expenses of the election campaign were paid. We also assessed whether the so-called intra-party transactions could be determined from the submitted data, i.e. transfers of money from one account to another owned by the party. This is especially important because the inclusion of these inflows, i.e. outflows in the calculation of expenses and revenues fictitiously increases their amount, since it is essentially a transfer of funds between the party's accounts.

[30] In the case of parties that did not respond to our requests for information at all, their transparency score is certainly 0, regardless of whether they have a particular type of data or not.

B.

Scores

We marked each of these criteria with a score from 1 to 5, where their fulfilment of over 95% gave a score of 5, over 75% a score of 4, over 50% a score of 3, and for score of 2, it was necessary to meet at least 25% of the set criteria. In this way, we obtained both qualitative and quantitative scores of the same data, and the lower one was entered in the table of transparency scores. [31]

After that, we calculated the **intermediate score of the transparency of data from the head office, the Women's Forum, as well as municipal boards and election accounts**, in such a way that the score of each form of spending was evaluated according to its share in total spending. [32] For example, if the spending of the party's treasury in relation to the total spending was 6%, then the share of its score in the total score of the head office was as much.

Example of calculation of scores:

The party head office spent 100,000 euros through the bank account, 50,000 through the treasury, 30,000 through the business card and 20,000 through the foreign currency account.

Thus, total expenses of the party are 200,000 euros, of which 50% goes through the bank account, 25% through the treasury, 15% through the card and 10% through the foreign currency account.

In that case, the formula for calculating the transparency score of the party head office is: $0.5 \times \text{bank account score} + 0.25 \times \text{treasury score} + 0.15 \times \text{card score} + 0.10 \times \text{foreign currency account score}$.

The intermediate scores thus calculated were used to calculate the next-order scores. Namely, the score of the bank account, the Women's Forum, the foreign currency account and payment cards was used to obtain the intermediate scores of the head office, and thus the intermediate scores of the Women's Forum and municipal boards.

These intermediate scores are then used to calculate **transparency scores of the regular party financing**. According to the same principle, the percentage share of the expenses of the head office, the Women's Forum and municipal boards in the total expenses of the funding of regular operation was determined, and based on that, we calculated a joint score. [33]

According to the same principle, **the transparency score of election campaign financing** [34], **is calculated, followed by the overall transparency score of the party financing**. [35]

[31] For example, if a party published over 75% of statements (data availability score 4), but these statements contain 60% of transactions for which it is possible to identify sources i.e. suppliers, a score of 3 is obtained.

[32] The share of bank accounts, treasury, cards and foreign currency accounts in total spending was determined in the following ways: 1) for the parties that provided us with all the data, we calculated what percentage of the total funds they spent through bank accounts, treasuries, i.e. cards and foreign currency account, (2) for parties that did not provide us with complete data, we requested this information in the audit reports for 2019 and 2020, (3) for parties that did not provide us with data that we know exists, we used average data for that party.

[33] Transparency score of regular funding is obtained according to the formula: $\% \text{RUUT} \times \text{intermediate score of the head office} + \% \text{RUUT} \times \text{intermediate score of the Women's Forum} + \% \text{RUUT} \times \text{intermediate score of municipal boards}$; where RUUT represents total expenses of financing the regular operation.

[34] According to the formula: $\% \text{IUUT} \times \text{score of parliamentary elections} + \% \text{IUUT} \times \text{intermediate score of local elections 1} + \% \text{IUUT} \times \text{intermediate score of local elections 2} + \dots$, where IUUT represents the percentage share of specific elections in total expenses of the election campaign.

[35] The formula is: $\% \text{UUT} \times \text{score of regular financing} + \% \text{UUT} \times \text{score of election campaign financing}$, where UUT is the percentage share of the type of financing in total expenses of the party over a period of two years.

3. Analysis of election campaign financing

How we analysed the payment of official election campaign expenses

We compared the data from the official reports of the parties on the election campaign expenses with their statements from the election account, the election treasury, business cards, as well as accounts for financing the regular operation. In that way, we determined whether the parties paid specific expenses, when and from which account.

To identify these transactions, we used data we had previously collected from parties on campaign financing for the 2020 parliamentary elections, which included contracts with suppliers and invoices. Based on that analysis, we determined specific expenses for each party that were not paid by the end of 2021, i.e. in the period for which they provided us with data.

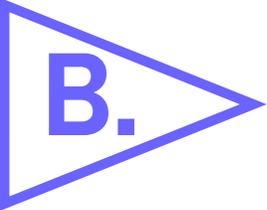
How we analysed the hidden campaign financing from the funds for regular operation

Each revenue or expense was analysed on the basis of bank account data and names of payers, i.e. suppliers, as well as information on the purpose of transactions, if any.

We first noted revenues, expenses, intra-party payments, cash withdrawals and cash payments. We then categorized the sources of revenue as: (1) state budget, (2) municipal budgets, (3) membership fees, (4) donations from natural person, (5) donations from legal persons, (6) payments from other parties, (7) loans, (8) other revenues and (9) secret, when the source of revenue cannot be determined from the available data.

Based on the data on the bank account from which the inflow came or to which the funds were poured, we determined transactions between different party accounts (intra-party transactions). We compared the matching of inflow and outflow data between different accounts, as well as with the treasury in the case of cash withdrawals, to determine if all information was provided to us.

Through the register of business entities, for each known supplier, we determined the activity to identify the category of expenses, if not specified in the transaction description. Based on the number of the bank account, we recognized the suppliers, even in cases when their (full) names were not listed in the submitted documentation.



B.

We then grouped the expenses into the following categories: (1) payments to natural persons, (2) expenses of office supplies, equipment and overhead, (3) transportation, (4) production of promotional material and hiring of marketing agencies, (5) media advertising, (6) payment to other parties, (7) loan repayment, (8) other expenses. When the parties did not provide us with data on treasury expenses, then a special category (9) cash withdrawal was introduced, and when treasury expenses were available, they were treated as an intra-party transaction. Categories are further divided into types of expenses.

We compared thus grouped data on expenses in 2019, during which there were no significant elections, with 2020, when parliamentary and local elections were held in several municipalities. We compared the data by years and months, both at the overall level and by categories and types, in order to determine whether the expenses increased during June, July and August 2020 compared to 2019. When possible, we then determined which transactions led to the increase based on the information provided.

C. **TRANSPARENCY OF FINANCING OF THE PARLIAMENTARY POLITICAL PARTIES**



10 parliamentary political parties published all or most of the data on their finances, three provided part of the information, of which one party hid almost all information, while five parties hid all data.

Bearing in mind the budgets of these parties, the public has access to information on spending of around 40% of official revenues, while 60% is mostly or completely hidden.

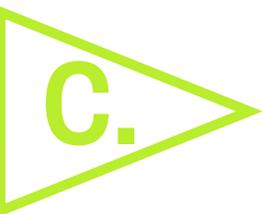
Around 44% of public funds are spent in a transparent manner and only one third of the funds that parties receive from private sources.

The transparency of parties was assessed based on the quantitative and qualitative criteria [36], thus, the transparency scores of financing the regular operation of parties and financing of the election campaigns were determined, followed by the average transparency score of financing of the political parties.

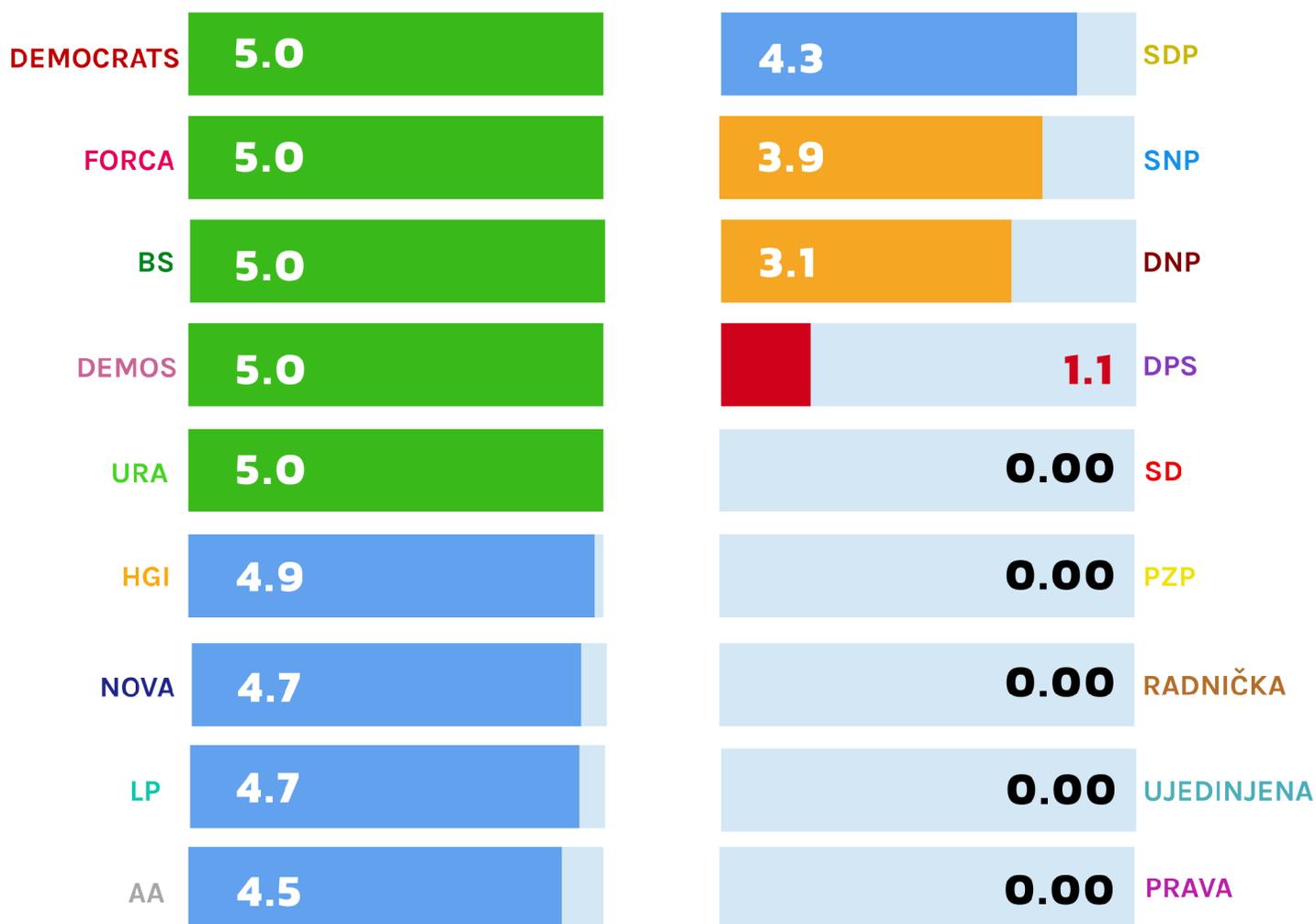
The graph shows the average transparency scores of financing of all parliamentary parties, with 5 being the highest and 0 being the lowest score. [37]

[36] More detailed information is given in Chapter B. Methodology.

[37] Ibid.



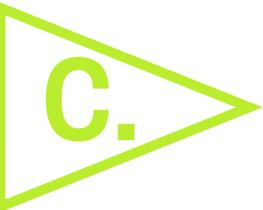
Average transparency scores of financing of the parliamentary political parties



Based on these scores, the parties are divided into five transparency groups:

- High: five parties publish all data,
- Medium: five parties publish most of the information,
- Low: two parties publish little data,
- Very low: one party provides very little information, and
- No transparency: five parties do not publish the requested information at all.

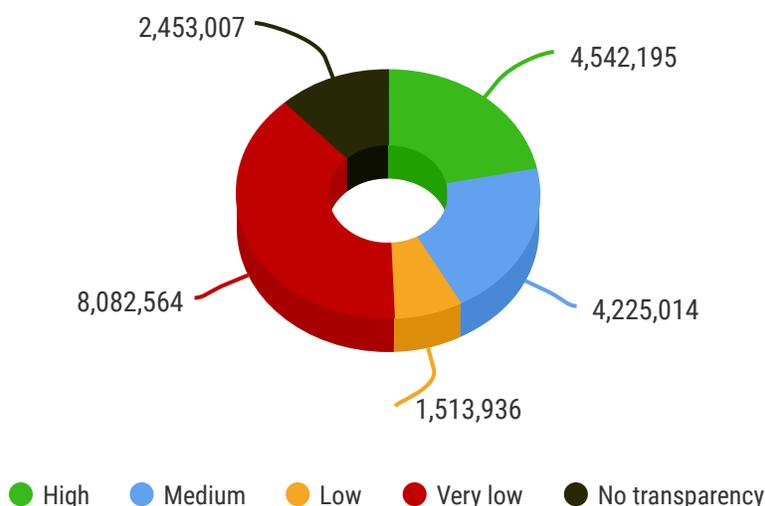
That is, **10 parties publish all or most of the data on their finances, while eight publish little or no information.**



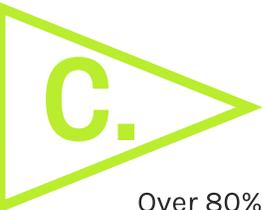
Publish all data DEMOCRATS FORCA BS DEMOS URA	Publish most data HGI NOVA LP AA SDP
Publish little data DNP SNP	Do not publish data SD PZP RADNIČKA UJEDINJENA PRAVA
Publishes very little data DPS	

When the level of transparency is put in relation to the official revenues of parliamentary parties [38], we come to the conclusion that 22% of available funds were spent in a highly transparent manner, 20% in a medium transparent, as much as 46% is insufficiently transparent, while 12% was spent in completely non-transparent manner. In other words, **the public has access to information on the spending of 42% of official revenues, while 58% are mostly or completely hidden.**

Transparency of financing in relation to official revenues of the parliamentary parties in 2019 and 2020

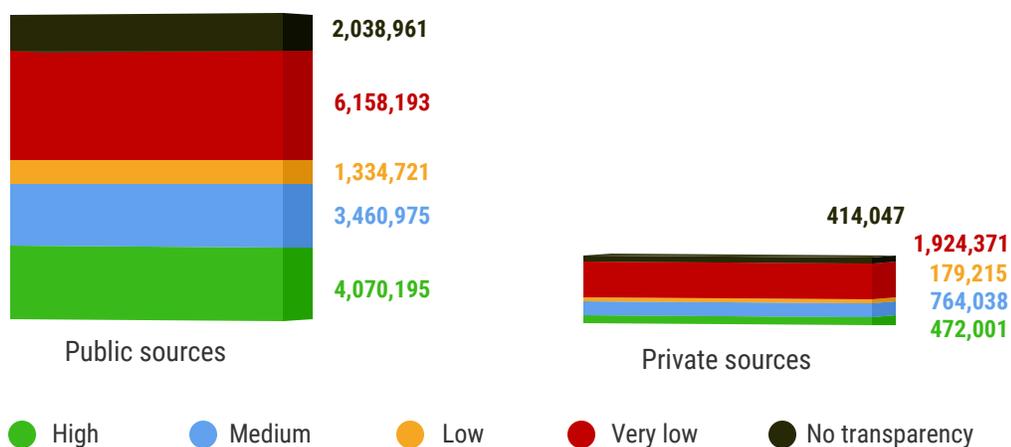


[38] Revenue data are taken from the audited or consolidated financial statements of the parties.



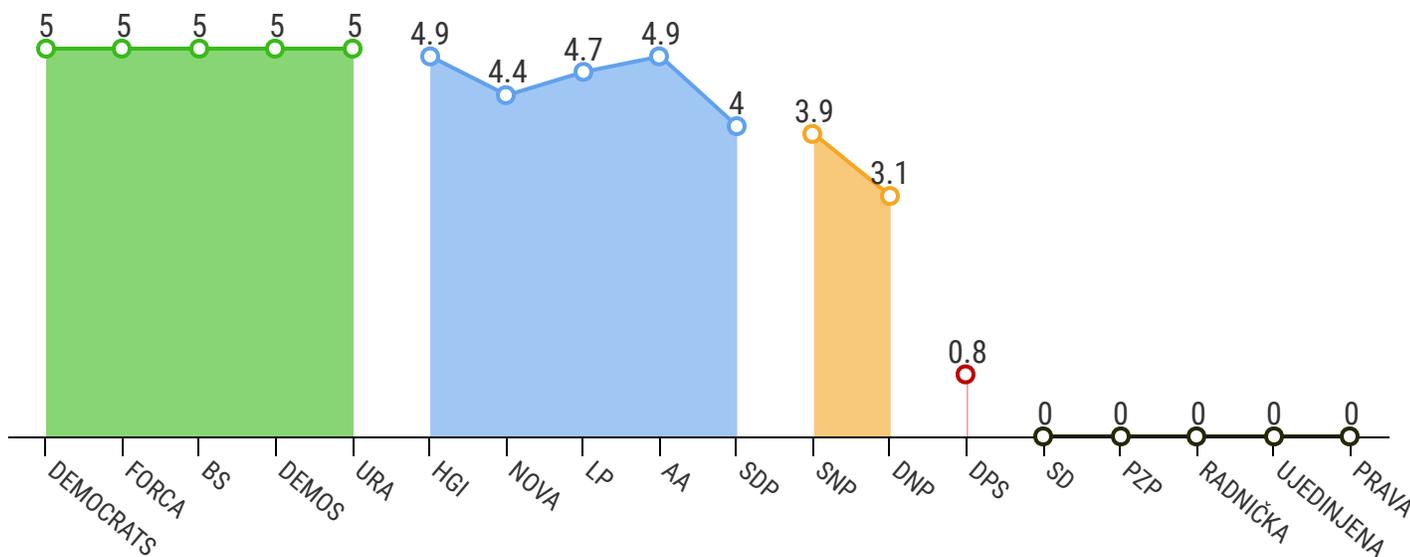
Over 80% of the party's funds are provided from public funds, primarily the state budget, but also the budgets of local self-governments. **Around 44% of public funds are spent in a transparent manner** (high and medium transparency), **as well as a third of the funds that parties receive from private sources.**

Transparency of financing in relation to sources of funds of the parliamentary parties in 2019 and 2020



Transparency scores of the financing of regular operation are lower than the average scores in the case of NOVA, SDP, DPS, while in the case of AA, the score is higher than the average.

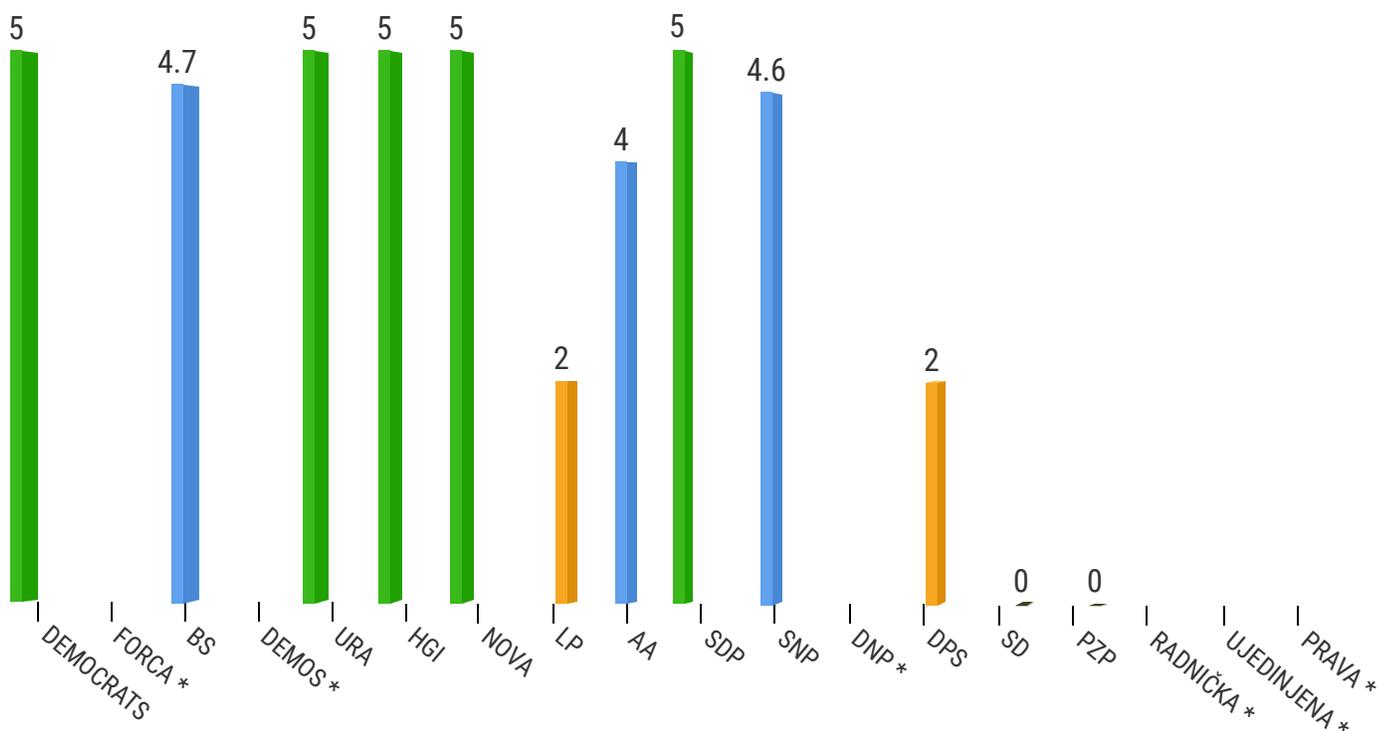
Transparency score of the regular financing of parliamentary parties





NOVA, SDP, SNP and DPS have a higher transparency score of the election campaign financing than the average, while these scores are lower than the average in the case of BS and LP.

Transparency score of the election campaigns financing



* these parties do not have scores because they did not manage the finances of any election campaign in 2019 and 2020

Separate chapters provide more detailed information and explanations for the transparency scores of each parliamentary party.

D.1.

Democratic Party of Socialists (DPS)

During 2019 and 2020, the Democratic Party of Socialists earned over eight million euros, of which over six million was paid from the state and municipal budgets, according to official reports.

Although it has by far the largest budget of all parliamentary parties, DPS is among the parties with very low transparency, with an average score of 1.09.

DPS deleted data from bank statements in order to hide the identity of the companies and persons who financed it or earned income from that party. The information was deleted even from the election account, although this information should be consistent with the submitted official reports stating the names of all donors and suppliers.

Two days before the elections, DPS spent nearly 100 thousand euros from the account for financing the regular operation for over 200 individual payments that were realized on the same day, and they amounted to around 450 euros each on average. According to the official report, DPS did not have the expenses of the members' per diems in the election campaign.

The party's audit reports show that the expenses of the regular operation increased in the election year compared to the previous one, as follows:



nearly six times higher expenses of public opinion polls,



nearly six times more expensive computer and office equipment,



mobile phone expenses doubled.

At the same time, DPS did not report the equipment and phone expenses in the reports on the financing of the election campaign, and stated a significantly lower amount of expenses for public opinion polls.

Due to the deletion of data, it was not possible to determine whether that party paid all the election campaign expenses.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from DPS on inflows and outflows from 6 accounts during 2019 and 2020, as follows: one bank account of the head office, one account of the Women's Forum, one foreign currency account and three election accounts – for parliamentary elections, for local elections in Tivat, as well as elections in Kotor, Budva, Andrijevica and Gusinje.

Transparency scores of financial operations

Total transparency score [39] of DPS' financing is 1.09. Transparency score of the regular operation financing of that party is 0.82, while the transparency score of the election campaigns financing is 1.98.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
Head office	1	1	-	0
	cannot be determined because the number of the statement is deleted complete data available for 13% of transactions	cannot be determined because the number of the statement is deleted complete data not available for any transaction	there is no information in the SAI report that they existed, no response was provided upon request -	not delivered, exists according to SAI (2020) -
Women's Forum	3	-	-	-
	we have data on 82% of inflows and all expenses (SAI 2020) complete data available for 38% of transactions	there is no information in the SAI report that they existed, no response was provided upon request -	there is no information in the SAI report that they existed, no response was provided upon request -	there is no information in the SAI report that it existed, no response was provided upon request -
Municipal boards	0	-	-	0
	In 2020, there were 22 bank accounts of municipal boards (SAI report: revenues 68.8 thousand, expenses 1.3 thousand), 0 submitted -	there is no information in the SAI report that they existed, no response was provided upon request -	there is no information in the SAI report that they existed, no response was provided upon request -	not delivered, exists according to SAI (2020) -
Transparency score of the regular operation financing				0.82

[39] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	2 we have data on more inflows and outflows than the official data show, which can be intra-party payments	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that it existed, no response was provided upon request
	complete data available for 13% of transactions	-	-	-
Kotor	2 * we have data on 92% of reported expenses	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that it existed, no response was provided upon request
	complete data available for 23% of transactions	-	-	-
Budva	<i>* joint statement (KO, BD, AN, GU)</i>			
Tivat	2 at least 35% of transactions are missing because there are no repayments of over 12 thousand to the head office (report of the Agency for Prevention of Corruption), there is no data on all statements, thus, it is unknown how many are missing	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that it existed, no response was provided upon request
	complete data available for 25% of transactions	-	-	-
Tuzi	0 no data provided	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that they existed, no response was provided upon request	- there is no information in the SAI report that it existed, no response was provided upon request
	-	-	-	-
Andrijevica	<i>* joint statement (KO, BD, AN, GU)</i>			
Gusinje	<i>* joint statement (KO, BD, AN, GU)</i>			
Transparency score of the election campaigns financing				1.98

Total transparency score of the party financing

1.09

What is missing?

We were not provided with statements from the bank account of the municipal boards of DPS, or any treasury of this party, although audit reports confirm that they exist.

DPS deleted the data on the names of suppliers, their bank accounts and the description of payments, thus, for nearly 70% of the expenses of that party, there are only dates and amounts of payments. The amounts of the account balance were also deleted, thus, it is impossible to determine whether the statements are missing and which ones.

It is almost identical when it comes to the party's revenues, whether it is donations from legal or natural persons, payments from the state or from municipal budgets - for most payments it is not possible to identify the source because the basic data are deleted, and only payment amounts and dates are available. Most of the known data refer to revenues related to the financing of parliamentary elections which are available in official reports, thus, it was possible to identify them earlier.

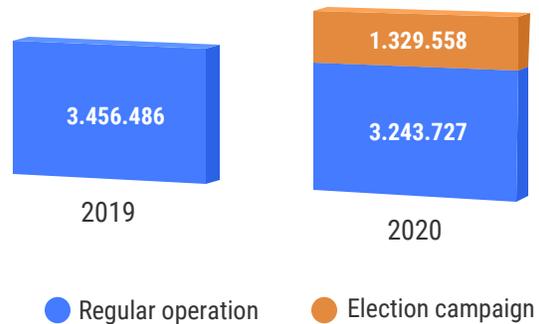
Due to that, the analysis of the financing of this party is extremely limited, and it is particularly impossible to determine whether all the reported expenses of the election campaign have been paid.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues of DPS in 2019 were **around 3.4 million euros**. In 2020, the revenues on the accounts for regular financing were **over 3.2 million**, and around 1.3 million euros was paid for the election campaign.

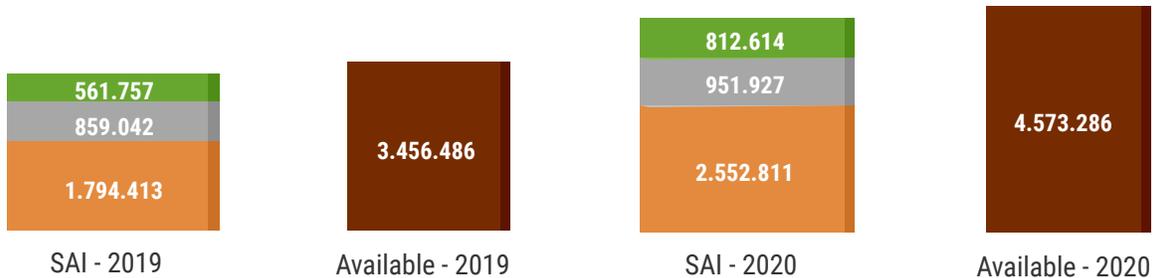
Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with auditor's data

The data on the DPS' revenues that we have are slightly higher than those stated by the SAI, because due to the deletion of data, it was impossible to determine all intra-party payments. Namely, DPS did not submit a single bank account of the municipal board, and the information from the treasury of the head office on the recipients and payers of funds was mostly deleted. Therefore, some revenues on one or more bank accounts that are available to us represent payments from other accounts of the party that were not submitted to us, and to which the head office previously transferred funds.

Comparison of SAI data on total revenues with available information from available accounts in 2019 and 2020



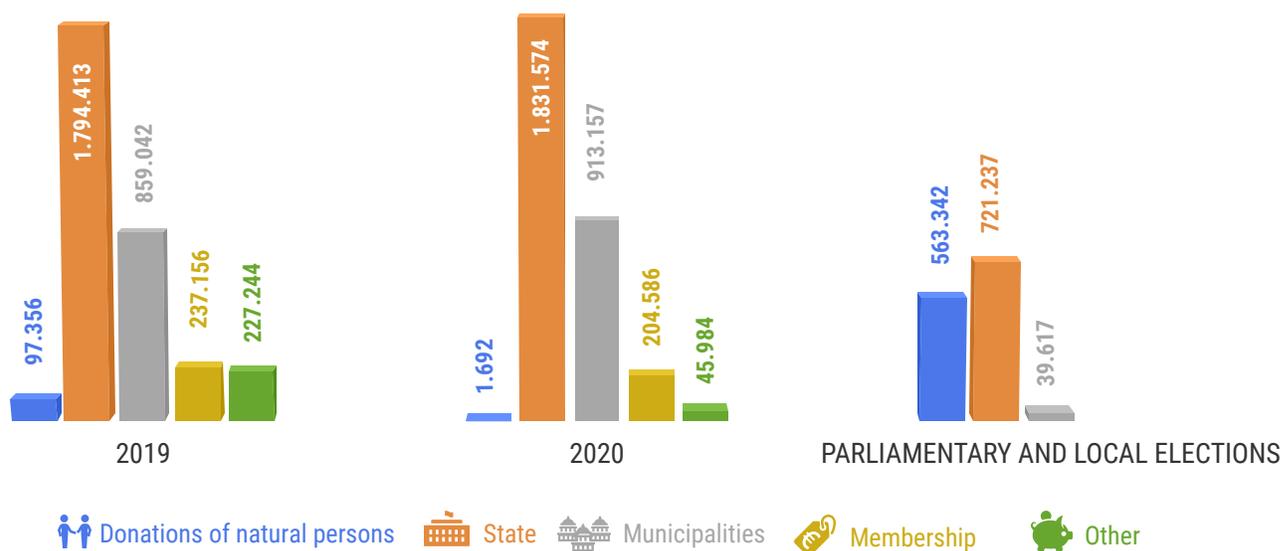
State
 Municipalities
 Other
 Unclassified

Revenue sources

From the data that DPS made public, it is impossible to determine the sources of financing of that party, even when it comes to state and municipal funds, because the data on names and bank accounts of most legal and natural persons who paid funds to them were deleted. Sources are known for only 20% of revenues, and this mainly refers to the election campaign financing, for which the parties submit detailed reports regardless.

According to the State Audit Institution (SAI) [40], which audited DPS's consolidated account, donations increased significantly during the election year, as did the party's funds from the state, as they include payments related to election campaign expenses. Due to the holding of local elections, there was a slight increase in revenues from municipal budgets. Other revenues of that party were significantly higher in 2019, due to, as stated by the SAI, the sale of a real estate of that party worth 170 thousand euros.

Revenue sources in 2019 and 2020



DPS took two loans of 400,000 and 150,000 euros in the election year. The funds on the basis of the loan were paid into the account for financing the regular operation of the party on July 10 and August 19. On July 15, DPS transferred 350,000 euros and an additional 150,000 euros from the account for regular operation to the account for financing the election campaign. One day after the payment of the second loan, on August 20, DPS transferred 150 thousand euros to the election account, which was the amount of that loan.

[40] Audit Report of Consolidated Annual Financial Statement of Democratic Socialist Party for 2019 and 2020, State Audit Institution, <http://www.dri.co.me/1/doc/lzvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20partije%20socijalista%20Crne%20Gore%20za%202020.%20godinu.pdf>; <http://www.dri.co.me/1/doc/lzvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20partije%20socijalista%20Crne%20Gore%20za%202019.%20godinu.pdf>.

1.2.

In its report, SAI concludes that these are loans to maintain current liquidity and to provide working capital. In the end, SAI concludes that "the Party has settled its liabilities under these loans by repaying the entire amount of the loan at once". [41]

DPS' finances show that at the end of September, they returned 150 thousand euros from the election account to the account for regular financing which they did not spend for the needs of the election campaign, which they stated in their election report. After the state paid over 700 thousand euros to the election account on October 15, based on the votes won, a day later, a total of 500 thousand euros was transferred to the account for financing the regular operation through two payments of 350 and 150 thousand euros. On the same day, DPS repaid both loans.

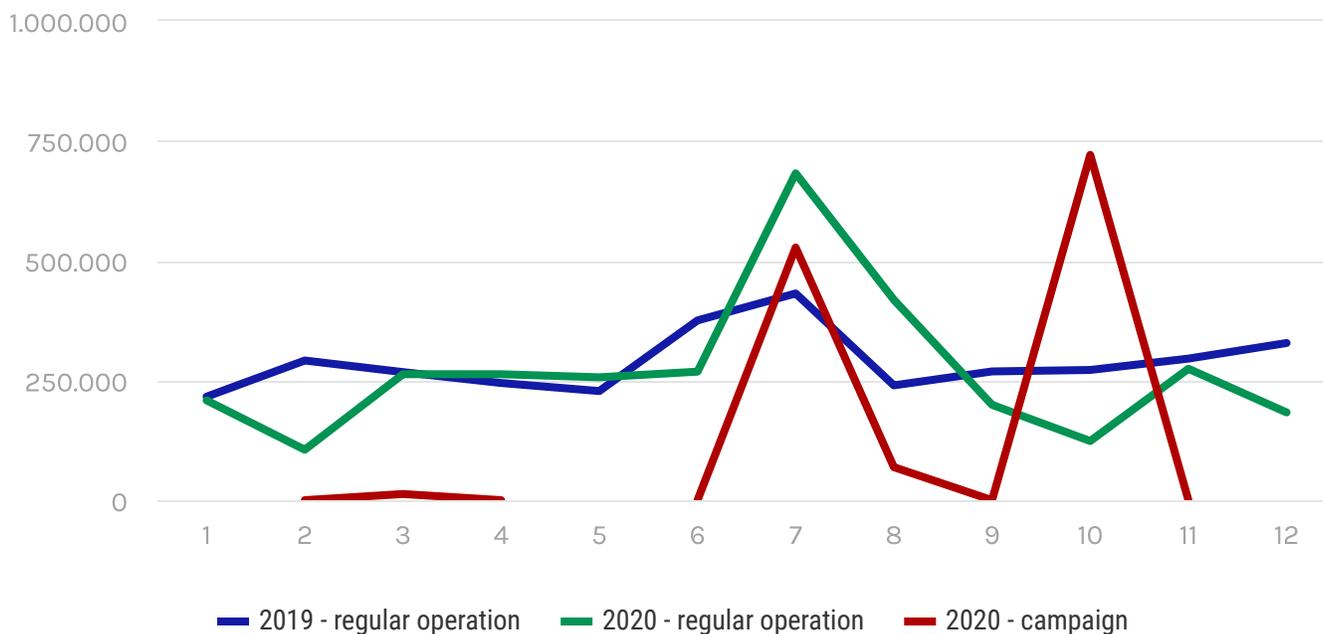
On October 26, 2020, DPS transferred the remaining 370 thousand euros in the account for financing the election campaign to the account for regular operation.

Average monthly revenues and payment dynamics

Bank statements show that DPS had significantly higher revenues on the head office's account in July 2020, compared to the same period in 2019. The data show that on July 10, 2020, the amount of 400,000 euros, whose source is unknown, was paid into the DPS' bank account. On August 19, 2020, 150 thousand euros was paid into the account of the head office, but the source of those funds is also unknown.

SAI data show that these are two short-term loans with Podgorička banka - OTP Group. Both loans were taken for a period of four months with an interest rate of 3.90%. [42]

All available revenues by months (2019 and 2020)



[41] State Audit Institution, Audit Report of Consolidated Annual Financial Statement of Democratic Socialist Party for 2020, page 17

[42] State Audit Institution, Audit Report of Consolidated Annual Financial Statement of Democratic Socialist Party for 2020, page 17

<http://www.dri.co.me/1/doc/lzvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20partije%20socijalista%20Crne%20Gore%20za%202020.%20godinu.pdf>

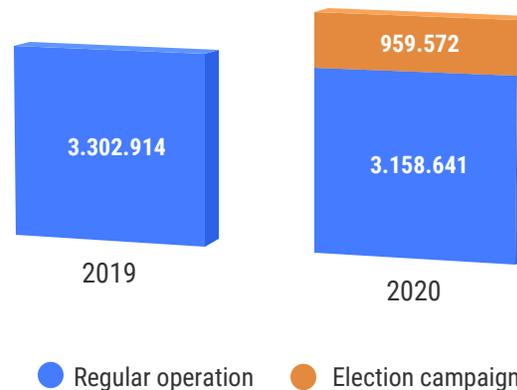
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

The expenses of regular operation of DPS in 2019 amounted to **around 3.3 million euros**, and to **around 3.1 million** in 2020.

The reported expenses of the parliamentary and local elections were nearly one million euros.

Available expenses of regular operation and election campaigns (2019 and 2020)



Based on data that were not deleted from DPS' statement and the party's election report, we were able to identify around 1.7 million euros in outflows from accounts related to the transfer to other accounts of that party (intra-party payments). [43]

However, SAI data show that the total DPS' expenses in 2019 were 3.3 million euros, and 3.8 million euros in 2020. This means that additional intra-party payments in 2019 were around 100 thousand euros, and around 270 thousand euros in 2020. It is impossible to identify these payments because the data on the bank accounts of the recipients were deleted from the statements, except in rare cases, and we were also not provided with statements from the accounts of the municipal boards.

However, total amounts of unidentified intra-party payments are relatively small compared to the total amounts of payments (3% and 7%), thus, the data at our disposal can be used for further analysis, with certain limitations.

[43] For example, from the account of the head office to the account for financing the election campaign, as well as the repayment of the remaining funds after closing the account, transfer to certain municipal boards in cases where the recipient data was not deleted.

Monthly expenses

During the election campaign, in August 2020, DPS had increased expenses of financing the regular operation compared to the same period of the previous year. Two days before the elections, on August 28, 2020, that party paid around 94 thousand euros through 205 payments, which averaged around 450 euros each. These funds were paid from the account for financing the regular operation of the party. At the same time, in the report on the election campaign financing, DPS states that it did not have the expenses of its members' per diems.

On the same day, there was a payment of over 50 thousand euros from the account for financing the regular operation, for which can be concluded that it was paid to the Tax Administration. [44] In addition, on that day, there were three more payments to unknown suppliers worth a total of around 10 thousand euros.

Promene stanja na racunu 550-000000003600-50 na dan 28.08.2020

Red. br. nal.	Naziv i sedište primaoca - nalogođavca broj racuna	Deponent iz (naziv i sedište banke)	IZNOS		Šifra	Naziv i adresa uplatoc - primaoc svrha doznake	Poziv na broj (zaduženje) Poziv na broj (odobrenje)	Podaci o reklamaciji
			zadužuje	odobrava				
592		Podgoricka banka AD Podgorica member of	4,446.33	0.00	451			
593		Podgoricka banka AD Podgorica member of	1,500.00	0.00	463			
594		Podgoricka banka AD Podgorica member of	0.00	483.32	163			
595		Poreska uprava	50,104.54	0.00	163			
596		Crnogorska komercijalna banka	1,125.28	0.00	151			

597		Crnogorska komercijalna banka	1,060.06	0.00	151			
598		Podgoricka banka AD Podgorica member of	0.00	28.66	163			
599		Podgoricka banka AD Podgorica member of	0.00	25.02	163			
600		Podgoricka banka AD Podgorica member of	0.00	211.40	163			
601		Podgoricka banka AD Podgorica member of	1,311.60	0.00	151			
602		Podgoricka banka AD Podgorica member of	553.87	0.00	151			
603		Podgoricka banka AD Podgorica member of	0.00	39.00	153			
604		NLB banka ad Podgorica	1,007.65	0.00	151			
605		Nisksicka banka	1,046.10	0.00	151			
606		Podgoricka banka AD Podgorica member of	0.00	780.97	121			
607		Podgoricka banka AD Podgorica member of	1,015.15	0.00	151			
608		Podgoricka banka AD Podgorica member of	747.45	0.00	151			
609		Nisksicka banka	1,059.14	0.00	151			
610		Crnogorska komercijalna banka	1,003.71	0.00	153			
611		Podgoricka banka AD Podgorica member of	922.04	0.00	151			
612		Podgoricka banka AD Podgorica member of	739.62	0.00	139			
613		Crnogorska komercijalna banka	1,107.84	0.00	151			
614		Addiko bank ad	1,000.00	0.00	151			
615		Podgoricka banka AD Podgorica member of	0.00	37.15	163			
616		NLB banka ad Podgorica	198.00	0.00	152			
617		Podgoricka banka AD Podgorica member of	300.00	0.00	151			

[44] Although DPS deleted the data on the recipients of funds, one of the columns states the name of the Tax Administration.

1.3.

618	Podgoricka banka AD Podgorica member of	250.00	0.00	151		
619	Podgoricka banka AD Podgorica member of	250.00	0.00	151		
620	Podgoricka banka AD Podgorica member of	272.70	0.00	153		
621	Crnogorska komercijalna banka	461.18	0.00	151		
622	Crnogorska komercijalna banka	702.25	0.00	163		
623	Crnogorska komercijalna banka	715.45	0.00	151		
624	Crnogorska komercijalna banka	571.72	0.00	151		
625	Crnogorska komercijalna banka	763.01	0.00	151		
626	Crnogorska komercijalna banka	512.50	0.00	151		
627	Crnogorska komercijalna banka	488.83	0.00	151		
628	Crnogorska komercijalna banka	892.88	0.00	151		
629	Crnogorska komercijalna banka	488.83	0.00	151		
630	Crnogorska komercijalna banka	797.44	0.00	151		
631	Crnogorska komercijalna banka	478.95	0.00	151		
632	Crnogorska komercijalna banka	623.79	0.00	151		
633	Crnogorska komercijalna banka	330.09	0.00	151		
634	Crnogorska komercijalna banka	990.00	0.00	152		
635	Crnogorska komercijalna banka	715.16	0.00	151		
636	Crnogorska komercijalna banka	400.00	0.00	152		
637	Crnogorska komercijalna banka	389.68	0.00	151		
638	Crnogorska komercijalna banka	464.15	0.00	152		

639	Crnogorska komercijalna banka	711.94	0.00	151		
640	Hipotekarna banka	744.96	0.00	151		
641	Hipotekarna banka	476.45	0.00	152		
642	Hipotekarna banka	592.48	0.00	151		
643	Hipotekarna banka	319.98	0.00	152		
644	Hipotekarna banka	399.87	0.00	151		
645	Hipotekarna banka	504.36	0.00	152		
646	Hipotekarna banka	601.98	0.00	151		
647	Hipotekarna banka	951.20	0.00	151		
648	Hipotekarna banka	676.01	0.00	151		
649	Hipotekarna banka	623.79	0.00	151		
650	Hipotekarna banka	654.37	0.00	151		
651	Hipotekarna banka	421.18	0.00	151		
652	Hipotekarna banka	500.46	0.00	151		
653	Hipotekarna banka	770.32	0.00	151		
654	Hipotekarna banka	705.62	0.00	151		
655	Hipotekarna banka	680.36	0.00	151		
656	Hipotekarna banka	424.40	0.00	151		
657	Hipotekarna banka	358.57	0.00	151		
658	Hipotekarna banka	640.97	0.00	151		
659	Hipotekarna banka	498.30	0.00	151		

1.3.

660	NLB banka ad Podgorica	567.21	0.00	151		
661	NLB banka ad Podgorica	338.11	0.00	151		
662	NLB banka ad Podgorica	629.61	0.00	151		
663	NLB banka ad Podgorica	958.91	0.00	151		
664	NLB banka ad Podgorica	837.75	0.00	151		
665	NLB banka ad Podgorica	239.94	0.00	151		
666	NLB banka ad Podgorica	832.84	0.00	151		
667	NLB banka ad Podgorica	500.67	0.00	151		
668	NLB banka ad Podgorica	443.44	0.00	151		
669	NLB banka ad Podgorica	483.62	0.00	151		
670	Niksicka banka	525.70	0.00	151		
671	Niksicka banka	415.22	0.00	151		
672	Niksicka banka	587.52	0.00	151		
673	Niksicka banka	345.50	0.00	151		
674	Niksicka banka	718.73	0.00	151		
675	Niksicka banka	644.10	0.00	151		
676	Niksicka banka	999.51	0.00	151		
677	Niksicka banka	869.52	0.00	151		
678	Niksicka banka	858.75	0.00	151		
679	Niksicka banka	921.73	0.00	151		
680	Niksicka banka	635.39	0.00	151		
681	Niksicka banka	792.03	0.00	151		
682	Niksicka banka	492.77	0.00	151		
683	Niksicka banka	459.18	0.00	151		
684	Niksicka banka	935.16	0.00	151		
685	Niksicka banka	736.23	0.00	151		
686	Niksicka banka	396.00	0.00	152		
687	Niksicka banka	324.99	0.00	151		
688	Niksicka banka	551.99	0.00	151		
689	Niksicka banka	621.48	0.00	151		
690	Erste Bank AD Podgorica	641.01	0.00	151		
691	Erste Bank AD Podgorica	475.99	0.00	151		
692	Erste Bank AD Podgorica	626.70	0.00	151		
693	Erste Bank AD Podgorica	623.79	0.00	151		
694	Erste Bank AD Podgorica	500.00	0.00	151		
695	Addiko bank ad	499.00	0.00	151		
696	Addiko bank ad	338.61	0.00	151		
697	Addiko bank ad	390.14	0.00	151		
698	Addiko bank ad	295.98	0.00	151		
699	Addiko bank ad	438.17	0.00	151		
700	Addiko bank ad	847.29	0.00	151		
701	Addiko bank ad	632.05	0.00	151		

1.3.

702	Addiko bank ad		282.73	0.00	151		
703	Addiko bank ad		413.84	0.00	151		
704	Addiko bank ad		823.70	0.00	151		
705	Addiko bank ad		623.79	0.00	151		
706	Addiko bank ad		669.96	0.00	151		
707	Addiko bank ad		494.97	0.00	151		
708	Crnogorska komercijalna banka		300.00	0.00	151		
709	Crnogorska komercijalna banka		594.00	0.00	152		
710	Crnogorska komercijalna banka		300.00	0.00	151		
711	Crnogorska komercijalna banka		300.00	0.00	151		
712	Hipotekarna banka		400.00	0.00	152		
713	NLB banka ad Podgorica		300.00	0.00	152		
714	NLB banka ad Podgorica		350.00	0.00	152		
715	Niksicka banka		500.00	0.00	151		
716	Niksicka banka		300.00	0.00	151		
717	Niksicka banka		300.00	0.00	151		
718	Niksicka banka		300.00	0.00	152		
719	Erste Bank AD Podgorica		300.00	0.00	152		
720	Addiko bank ad		500.00	0.00	151		
721	Crnogorska komercijalna banka		240.00	0.00	151		
722	Hipotekarna banka		300.00	0.00	151		

Kartica žiro računa - Detalji

09.11.2020 / 11:00:32

Strana 40

723	NLB banka ad Podgorica		250.00	0.00	152		
724	NLB banka ad Podgorica		396.00	0.00	152		
725	NLB banka ad Podgorica		250.00	0.00	152		
726	Crnogorska komercijalna banka		250.00	0.00	151		
727	NLB banka ad Podgorica		400.00	0.00	152		
728	Niksicka banka		400.00	0.00	152		
729	Podgoricka banka AD Podgorica member of		95.96	0.00	153		
730	Podgoricka banka AD Podgorica member of		0.00	95.96	153		
731	Addiko bank ad		1,945.43	0.00	153		
732	Podgoricka banka AD Podgorica member of		34.08	0.00	153		
733	Podgoricka banka AD Podgorica member of		100.00	0.00	153		
734	Crnogorska komercijalna banka		0.00	30.00	121		
735	Hipotekarna banka		1,389.86	0.00	153		
736	Podgoricka banka AD Podgorica member of		32.16	0.00	153		
737	Podgoricka banka AD Podgorica member of		0.00	803.01	153		
738	Podgoricka banka AD Podgorica member of		803.01	0.00	153		
739	Podgoricka banka AD Podgorica member of		0.00	451.03	153		
740	Podgoricka banka AD Podgorica member of		451.03	0.00	153		
741	Crnogorska komercijalna banka		0.00	25.00	21		
742	Hipotekarna banka		0.00	35.00	153		
743	Podgoricka banka AD Podgorica member of		276.13	0.00	139		

Kartica žiro računa - Detalji

09.11.2020 / 11:00:32

Strana 41

1.3.

744		Crnogorska komercijalna banka	0.00	30.32	121		
745		Podgoricka banka AD Podgorica member of	0.00	18.00	163		
746		Podgoricka banka AD Podgorica member of	16.76	0.00	139		
747		Podgoricka banka AD Podgorica member of	0.00	14.00	163		
748		Podgoricka banka AD Podgorica member of	0.00	10.50	163		
749		Podgoricka banka AD Podgorica member of	0.00	10.50	163		
750		Podgoricka banka AD Podgorica member of	0.00	10.50	163		
751		Podgoricka banka AD Podgorica member of	0.00	31.88	163		
752		Podgoricka banka AD Podgorica member of	0.00	10.50	163		
753		Podgoricka banka AD Podgorica member of	0.00	31.24	163		
754		Podgoricka banka AD Podgorica member of	0.00	39.11	163		
755		Podgoricka banka AD Podgorica member of	0.00	27.75	163		
756		Podgoricka banka AD Podgorica member of	0.00	108.75	163		
757		Podgoricka banka AD Podgorica member of	0.00	12.60	163		
758		Podgoricka banka AD Podgorica member of	0.00	10.50	163		
759		Podgoricka banka AD Podgorica member of	45.18	0.00	139		
760		Podgoricka banka AD Podgorica member of	0.00	36.54	121		
761		Podgoricka banka AD Podgorica member of	0.00	90.19	163		
762		Podgoricka banka AD Podgorica member of	0.00	14.00	163		
763		Podgoricka banka AD Podgorica member of	300.00	0.00	151		
764		Hipotekarna banka	200.00	0.00	163		

765		Crnogorska komercijalna banka	510.00	0.00	151		
766		Crnogorska komercijalna banka	250.00	0.00	152		
767		Crnogorska komercijalna banka	460.39	0.00	152		
768		Crnogorska komercijalna banka	300.00	0.00	151		
769		Crnogorska komercijalna banka	300.00	0.00	151		
770		Crnogorska komercijalna banka	300.00	0.00	151		
771		Crnogorska komercijalna banka	500.00	0.00	153		
772		Crnogorska komercijalna banka	500.00	0.00	151		
773		Crnogorska komercijalna banka	250.00	0.00	152		
774		Crnogorska komercijalna banka	12.02	0.00	139		
775		Crnogorska komercijalna banka	11.02	0.00	139		
776		Crnogorska komercijalna banka	500.00	0.00	151		
777		Crnogorska komercijalna banka	500.00	0.00	152		
778		Crnogorska komercijalna banka	207.82	0.00	163		
779		Crnogorska komercijalna banka	10.64	0.00	300		
780		Crnogorska komercijalna banka	107.29	0.00	153		
781		Crnogorska komercijalna banka	12.72	0.00	139		
782		Crnogorska komercijalna banka	11.23	0.00	139		
783		Crnogorska komercijalna banka	29.47	0.00	139		
784		Crnogorska komercijalna banka	24.28	0.00	139		
785		Podgoricka banka AD Podgorica member of	0.00	11.40	121		

1.3.

786	Hipotekarna banka	300.00	0.00	153
787	Hipotekarna banka	300.00	0.00	153
788	Hipotekarna banka	300.00	0.00	151
789	Hipotekarna banka	500.00	0.00	152
790	Hipotekarna banka	150.00	0.00	153
791	Komercijalna banka AD Podgorica	10.50	0.00	153
792	Komercijalna banka AD Podgorica	27.52	0.00	139
793	NLB banka ad Podgorica	500.00	0.00	152
794	NLB banka ad Podgorica	222.00	0.00	153
795	NLB banka ad Podgorica	79.95	0.00	153
796	NLB banka ad Podgorica	15.10	0.00	139
797	NLB banka ad Podgorica	24.63	0.00	139
798	NLB banka ad Podgorica	16.62	0.00	139
799	NLB banka ad Podgorica	90.75	0.00	139
800	NLB banka ad Podgorica	48.87	0.00	139
801	NLB banka ad Podgorica	23.86	0.00	139
802	NLB banka ad Podgorica	202.66	0.00	163
803	NLB banka ad Podgorica	163.33	0.00	153
804	Niksicka banka	348.12	0.00	152
805	Niksicka banka	450.00	0.00	151
806	Niksicka banka	400.00	0.00	152

Kartica žiro racuna - Detalji

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807	Niksicka banka	300.00	0.00	151
808	Niksicka banka	225.45	0.00	153
809	Niksicka banka	304.39	0.00	153
810	Niksicka banka	310.40	0.00	153
811	Niksicka banka	200.00	0.00	153
812	Niksicka banka	8.47	0.00	139
813	Niksicka banka	26.61	0.00	139
814	Niksicka banka	21.67	0.00	139
815	Niksicka banka	12.66	0.00	139
816	Niksicka banka	39.15	0.00	139
817	Niksicka banka	36.29	0.00	139
818	Erste Bank AD Podgorica	281.52	0.00	151
819	Erste Bank AD Podgorica	329.32	0.00	151
820	Erste Bank AD Podgorica	154.39	0.00	153
821	Erste Bank AD Podgorica	36.51	0.00	139
822	Erste Bank AD Podgorica	250.00	0.00	151
823	Erste Bank AD Podgorica	70.00	0.00	153
824	Lovćen banka	3.00	0.00	153
825	Lovćen banka	14.81	0.00	139
826	Podgoricka banka AD Podgorica member of	0.00	84.73	153
827	Podgoricka banka AD Podgorica member of	256.00	0.00	163

Kartica žiro racuna - Detalji

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1.3.

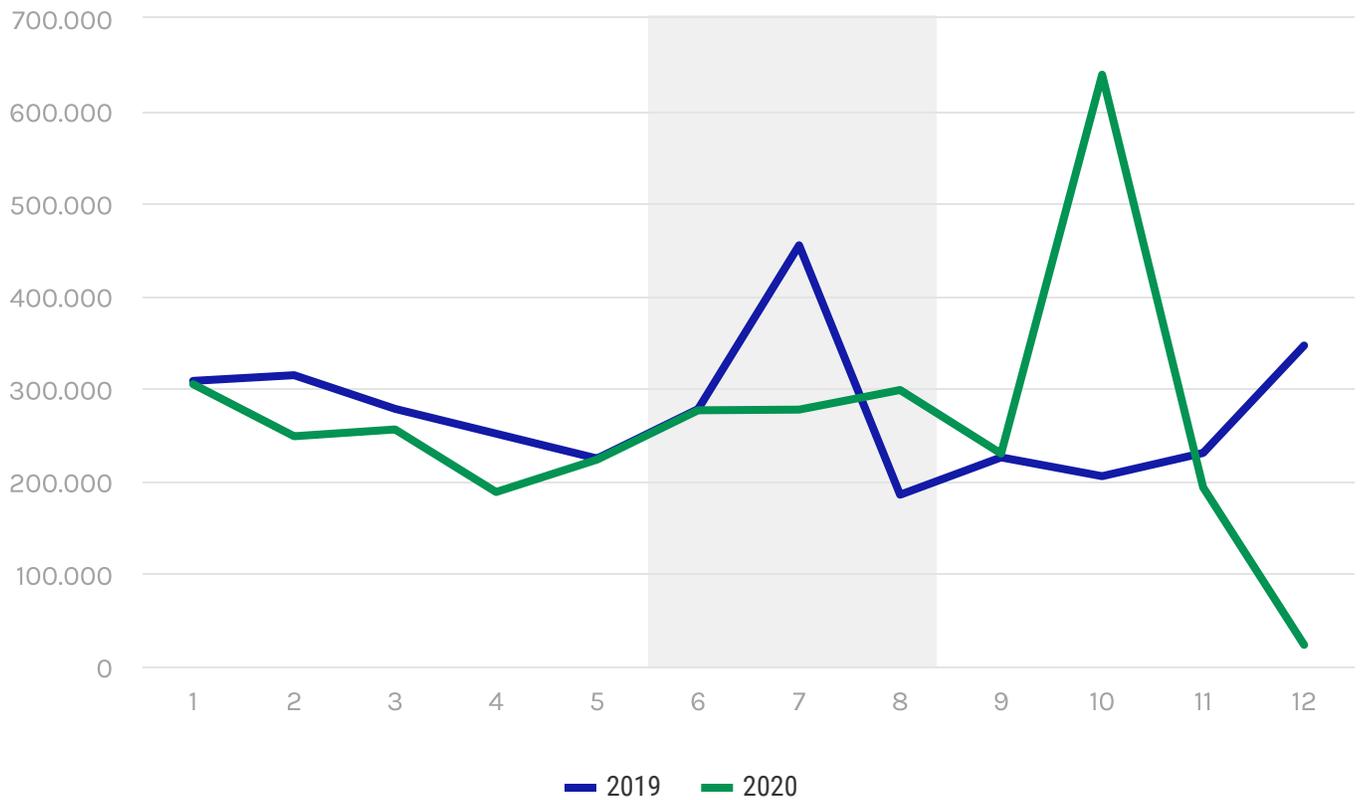
828	Hipotekarna banka	0.00	70.74	153		
829	Niksicka banka	2,722.50	0.00	163		
830	Komercijalna banka AD Podgorica	2,865.14	0.00	163		
831	Niksicka banka	0.00	18.50	163		
832	Niksicka banka	0.00	1.00	163		
833	Niksicka banka	0.00	1.00	163		
834	Niksicka banka	0.00	1.00	163		
835	Niksicka banka	0.00	1.00	121		
836	Podgoricka banka AD Podgorica member of	0.00	13.69	121		
837	Crnogorska komercijalna banka	0.00	34.50	163		
838	Crnogorska komercijalna banka	0.00	36.51	163		
839	Crnogorska komercijalna banka	0.00	30.00	153		
840	Erste Bank AD Podgorica	1,000.00	0.00	163		
841	Crnogorska komercijalna banka	300.00	0.00	163		
842	Niksicka banka	0.00	79.54	153		
843	Hipotekarna banka	0.00	1.00	153		
844	Podgoricka banka AD Podgorica member of	69.33	0.00	221		
Ukupno EUR		154,073.88	3,937.01			

Photo 1: Statements from the account for financing the regular operation of DPS on August 28, 2020

1.3.

In October, two loans taken to finance the election campaign, with a total value of over 550,000 euros, were repaid from the account for regular operation financing.

Expenses of financing the regular operation, by months (2019 and 2020)



Which expenses of the regular operation increased in the election year?

Since the data on the recipient and the description of expenses were deleted from the statements, it is not possible to determine the consumption by types of expenses.

Somewhat more data on DPS' spending can be found in audit reports, which show that **six times more expensive computer and office equipment was purchased in the election year than in the previous year**. While in 2019 the equipment worth around 11 thousand euros [45] was procured, in 2020, the election year, computer and office equipment was purchased in the amount of over 65 thousand euros [46], according to SAI reports. In the report on the election campaign financing, DPS did not report the purchase of any equipment, thus, those expenses were borne by the regular financing of the party.

Public opinion polls in the election year are nearly six times higher than in the previous year, i.e. they increased from 32 to 191 thousand euros. [47] In the official report on the election campaign expenses, DPS reported only 24 thousand euros of expenses regarding public opinion polls. When taking this into account, **there is no explanation for the increase in poll expenses in the election year by around 135 thousand euros**.

In the report on the election campaign expenses, DPS did not list a single dime of the mobile phone expenses, while in the election year, these expenses doubled - from 48 thousand to nearly 117 thousand euros [48], as stated in the SAI reports.

[45] Audit Report of Consolidated Annual Financial Statement of Democratic Socialist Party for 2020, State Audit Institution, page 13
<http://www.dri.co.me/1/doc/Izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20partije%20socijalista%20Crne%20Gore%20za%202019.%20godinu.pdf>

[46] Audit Report of Consolidated Annual Financial Statement of Democratic Socialist Party for 2020, State Audit Institution, page 14
<http://www.dri.co.me/1/doc/Izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20partije%20socijalista%20Crne%20Gore%20za%202020.%20godinu.pdf>

[47] Pages 25 and 27 of the SAI report for 2019 and 2020, respectively
<http://www.dri.co.me/1/doc/Izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20partije%20socijalista%20Crne%20Gore%20za%202020.%20godinu.pdf>

[48] Pages 31 and 33 of the SAI report for 2019 and 2020, respectively
<http://www.dri.co.me/1/doc/Izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20partije%20socijalista%20Crne%20Gore%20za%202019.%20godinu.pdf>

PAYMENT OF ELECTION CAMPAIGN EXPENSES

As the data provided to us by DPS do not contain basic information, it was not possible to determine whether that party paid all the election campaign expenses.

DPS deleted data from bank statements, including the names of people who paid donations to the party, as well as suppliers paid in the election campaign.

At the same time, the official reports on the financing of the election campaign of that party contain data on all the names of donors, as well as the companies that provided them with services during the campaign. [49] There is no reason why DPS should delete those data from its financial statements, unless they differ from the official information reported by that party.

The verification of the data reported by DPS in relation to the information from their financial documentation is particularly important given the numerous scandals related to donations of that party. [50]

portal.antikorupcija.me:9343/acamPublic/izvestajDetails2.htm?parent=pretragalzvestaja&izvestajId=10304

Izbor								
Izbori za 30.08.2020								
Naziv političkog subjekta								
Demokratska partija socijalista	Datum izvještaja							
	29.09.2020							
Odgovorno lice								
Milka Vujović								
II. Izvještavanje o prikupljenim sredstvima iz javnih izvora								
Izvor novčanih sredstava	Prikupljena sredstva		Ukupno iznos sredstava (u €)	Ukupno iznos utrošenih sredstava (u €)				
	Procentualni iznos sredstava	Datum uplate						
Državni trezor	20,00	19.08.2020	43.051,01	0,00				
Ukupna suma prihoda iz javnih izvora			43.051,01	0,00				
III. Izvještavanje o prikupljenim sredstvima iz privatnih izvora								
Prihod od priloga pravnih lica								
Naziv pravnog lica	Oblik organizovanja	Opština	Datum prijema priloga	Vrsta priloga	Ukupno iznos novčanog priloga	Ukupno iznos nenovčanog priloga	Ukupna vrijednost priloga (u €)	Napomena
DDO ŠEF CO	DDO	Bijelo Polje	24.07.2020		1.000,00	0,00	1.000,00	
Ukupna suma prihoda od priloga pravnih lica					1.000,00	0,00	1.000,00	
Prihod od priloga fizičkih lica								
Ime i prezime	Opština	Datum prijema priloga	Vrsta priloga	Ukupno iznos novčanog priloga	Ukupno iznos nenovčanog priloga	Ukupna vrijednost priloga (u €)	Napomena	
Goran Radulović	Danilovgrad	07.07.2020	proizvod/usluga	1.500,00	0,00	1.500,00		
Slobo Jovović	Danilovgrad	07.07.2020		1.500,00	0,00	1.500,00		
Zdravko Đurović	Danilovgrad	07.07.2020		1.500,00	0,00	1.500,00		
Dražen Đukanović	Danilovgrad	07.07.2020		1.500,00	0,00	1.500,00		
Darko Kovačević	Danilovgrad	07.07.2020		1.500,00	0,00	1.500,00		
Ljubomir Jovanović	Danilovgrad	07.07.2020		1.500,00	0,00	1.500,00		
Savo Milonjić	Danilovgrad	07.07.2020		1.500,00	0,00	1.500,00		
Miloslav Radulović	Danilovgrad	07.07.2020		1.500,00	0,00	1.500,00		
Vukašin Đuranović	Danilovgrad	07.07.2020		1.000,00	0,00	1.000,00		
Snežana Simović	Podgorica	07.07.2020		700,00	0,00	700,00		
Ukupna suma prihoda od priloga fizičkih lica				496.452,00	0,00	496.452,00		

Photo 2: Official report of DPS on donations for election campaign

[49] The report of the Democratic Party of Socialists available on the website of the Agency for Prevention of Corruption: <https://portal.antikorupcija.me:9343/acamPublic/izvestajDetails2.htm?parent=pretragalzvestaja&izvestajId=10304>
 [50] For example: <http://www.mans.co.me/en/firefighters-helped-dps-campaign-with-e16000/>,
<http://www.mans.co.me/en/concessionaires-donated-e-13000-for-dps-campaign/>.

1.4.

Promene stanja na racunu 550-000000019745-18

na dan 22.07.2020

Red. br. nal.	Naziv i sedište primaoca - nalogodavca broj racuna	Deponent iz (naziv i sedište banke)	IZNOS		Šifra	Naziv i adresa uplatioc - primaoc svrha doznake	Poziv na broj (zaduženje) Poziv na broj (odobrenje)	Podaci o reklamaciji
			zadužuje	odobrava				
176		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
177		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
178		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
179		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
180		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
181		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
182		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
183		Podgoricka banka AD Podgorica member of	0.00	500.00	390			

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184		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
185		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
186		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
187		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
188		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
189		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
190		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
191		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
192		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
193		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
194		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
195		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
196		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
197		Podgoricka banka AD Podgorica member of	0.00	250.00	390			
198		Podgoricka banka AD Podgorica member of	0.00	500.00	390			
199		Nikšićka banka	0.00	5,000.00	163			
200		Erste Bank AD Podgorica	0.00	1,000.00	321			
201		Omogorska komercijalna banka	0.00	2,000.00	163			
202		Erste Bank AD Podgorica	0.00	1,000.00	321			
203		Nikšićka banka	0.00	500.00	321			
204		Nikšićka banka	0.00	500.00	321			

Kartica Ziro racuna - Detalji

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Strana 13

Photo 3: Part of the DPS' bank account statement where data on persons who paid donations were deleted

1.4.

← → ↻ portal.antikorupcija.me:9343/acamPublic/izvestajDetails2.htm?parent=pretragalzvestaja&izvestajId=10304

SOCIJALNI_MEDIJI	CTRL-S DOO	14.08.2020	17.08.2020	Plaćeno	0,00	14.08.2020 - 30.08.2020	1	36.300,00	definisane Ugovorom
TV	BOIN TUZI	19.08.2020	24.08.2020	Plaćeno	0,00	18.08.2020 - 28.08.2020	66	4.791,60	Broj emitovanja po fakturi
TV	RT MIR I TEUTA	20.08.2020	24.08.2020	Plaćeno	0,00	18.08.2020 - 28.08.2020	11	1.996,50	Broj emitovanja regulisan Ugovorom
TV	ANTENA M	13.08.2020	25.08.2020	Plaćeno	0,00	13.08.2020 - 28.08.2020	1	14.822,50	Broj emitovanja regulisan Ugovorom
SOCIJALNI_MEDIJI	CTRL-S DOO	25.08.2020	26.08.2020	Plaćeno	0,00	24.08.2020 - 30.08.2020	1	24.200,00	Usluge definisane Ugovorom
STAMPANI_MEDIJI	Nova Pobjeda	10.08.2020	26.08.2020	Plaćeno	0,00	12.08.2020 - 28.08.2020	1	18.447,66	Oglašavanje po Ugovoru
STAMPANI_MEDIJI	DNEVNE NOVINE	12.08.2020	26.08.2020	Plaćeno	0,00	12.08.2020 - 28.08.2020	1	11.434,50	Oglašavanje po Ugovoru
OSTALO	QLQL DOO	26.08.2020	27.08.2020	Plaćeno	0,00	23.08.2020 - 30.08.2020	1	6.957,50	Usluge definisane Ugovorom
SOCIJALNI_MEDIJI	STANDARD MEDIA DOO	24.08.2020	31.08.2020	Plaćeno	0,00	14.08.2020 - 31.08.2020	1	1.905,75	Broj emitovanja regulisan Ugovorom
TV	BOIN TUZI	01.09.2020	03.09.2020	Plaćeno	0,00	28.08.2020 - 29.09.2020	1	1.200,32	Broj emitovanja po fakturi
TV	AST DOO (PRVA TV)	02.09.2020	03.09.2020	Plaćeno	0,00	08.08.2020 - 28.08.2020	1	90.750,00	Broj emitovanja regulisan Ugovorom
TV	RTV Cetinje	01.09.2020	03.09.2020	Plaćeno	0,00	20.08.2020 - 28.08.2020	1	163,35	Broj emitovanja po fakturi
OSTALO	MAPA	04.09.2020	07.09.2020	Plaćeno	0,00	01.08.2020 - 31.08.2020	1	39.821,10	Usluge regulisane Ugovorom
TV	Pink Media M	07.09.2020	07.09.2020	Plaćeno	0,00	12.08.2020 - 28.08.2020	1	68.607,00	Broj emitovanja regulisan Ugovorom
RADIO	Oki Air Broadcasting	04.09.2020	07.09.2020	Plaćeno	0,00	15.08.2020 - 28.08.2020	1	7.149,78	Broj emitovanja regulisan Ugovorom
TV	NOVA M	04.09.2020	08.09.2020	Plaćeno	0,00	08.08.2020 - 28.08.2020	1	89.377,98	Broj emitovanja regulisan Ugovorom
OSTALO	DAA MONTENEGRO PODGORICA	03.09.2020	08.09.2020	Plaćeno	0,00	15.07.2020 - 30.08.2020	1	8.724,10	Usluge definisane Ugovorom
RADIO	Media international corporation DOO (DRS)	11.08.2020	08.09.2020	Plaćeno	0,00	10.08.2020 - 28.08.2020	1	5.183,64	Broj emitovanja po fakturi
RADIO	DOO Talas Bihora-Radio Petnjica	09.09.2020	11.09.2020	Plaćeno	0,00	14.08.2020 - 28.08.2020	1	544,50	Broj emitovanja regulisan Ugovorom

Photo 4: Official DPS' report on election campaign expenses

1.4.

IZVOD 37

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STANJE I PROMJENE SREDSTAVA NA DAN

07.09.2020 Godine

PODGORICKA BANKA OTP GROUP
0000 - Centrala banke

DPSCG - PARLAMENTARNI IZBORI 2020

Podgorica

550-000000019745-18

STANJE

matični broj 02011514

poreski broj 02011514

prethodno stanje	dnevni promet		novo stanje	broj naloga	
	duguje	potražuje		zaduženja	odobrenja
644,396.24	162,654.45	0.00	481,741.79	6	0

PROMJENE

Redni broj naloga	Naziv i sjedište primaoca - nalagodavca broj racuna	Poreklo naloga Datum knjiženja	IZNOS		Šifra	Svrha plaćanja	(Model) poziv na broj (zaduženja) (Model) poziv na broj (odobrenja)	Ref. cc. traž.
			zaduženje	odobrenje				
1.		0102-PJ Sv. Petar Cetinski 07.09.2020	88,607.00 Naknada 89.19	0.00	183			
2.		0102-PJ Sv. Petar Cetinski 07.09.2020	39,821.10 Naknada 62.12	0.00	183			
3.		0102-PJ Sv. Petar Cetinski 07.09.2020	36,408.90 Naknada 56.80	0.00	183			
4.		0102-PJ Sv. Petar Cetinski 07.09.2020	10,427.05 Naknada 19.50	0.00	183			
5.		0102-PJ Sv. Petar Cetinski 07.09.2020	7,149.78 Naknada 13.01	0.00	183			
6.		0000-Centrala banke 07.09.2020	240.62 Naknada 0.00	0.00	221			

Ukoliko niste dobili pismo ponude sa novim brojem Vašeg transakcionog računa u budućoj banci, kontaktirajte ličnog bank

Izvod broj 37

za račun 550-000000019745-18

Izvod za datum: 07.09.2020

Štampano: 11.01.2021 u 07:38:59

Si

IZVOD 38

Fah

STANJE I PROMJENE SREDSTAVA NA DAN

08.09.2020 Godine

PODGORICKA BANKA OTP GROUP
0000 - Centrala banke

DPSCG - PARLAMENTARNI IZBORI 2020

Podgorica

550-000000019745-18

STANJE

matični broj 02011514

poreski broj 02011514

prethodno stanje	dnevni promet		novo stanje	broj naloga	
	duguje	potražuje		zaduženja	odobrenja
481,741.79	107,596.18	0.00	374,145.61	6	0

PROMJENE

Redni broj naloga	Naziv i sjedište primaoca - nalagodavca broj racuna	Poreklo naloga Datum knjiženja	IZNOS		Šifra	Svrha plaćanja	(Model) poziv na broj (zaduženja) (Model) poziv na broj (odobrenja)	Ref. cc. traž.
			zaduženje	odobrenje				
1.		0103-PJ Sv. Petar Cetinski 08.09.2020	89,377.98 Naknada 116.19	0.00	121			
2.		0103-PJ Sv. Petar Cetinski 08.09.2020	8,724.10 Naknada 15.88	0.00	121			
3.		0102-PJ Sv. Petar Cetinski 08.09.2020	5,183.64 Naknada 9.43	0.00	121			
4.		0103-PJ Sv. Petar Cetinski 08.09.2020	3,811.50 Naknada 6.94	0.00	121			
5.		0103-PJ Sv. Petar Cetinski 08.09.2020	350.00 Naknada 0.52	0.00	121			
6.		0000-Centrala banke 08.09.2020	148.98 Naknada 0.00	0.00	221			

Ukoliko niste dobili pismo ponude sa novim brojem Vašeg transakcionog računa u budućoj banci, kontaktirajte ličnog bank

Izvod broj 38

za račun 550-000000019745-18

Izvod za datum: 08.09.2020

Štampano: 11.01.2021 u 07:39:08

Si

Photo 5: Part of the DPS' bank account statement where data on suppliers in the election campaign were deleted

D.2.

Democratic Montenegro (DEMOCRATS)

Democratic Montenegro earned 2.3 million euros in 2019 and 2020, of which over two million euros from the state and municipal budgets.

This party is among highly transparent parties, and its average score is 5.

Democrats had increased expenses of financing the regular operation during the election campaign compared to the same period of the previous year:



50% higher payments for temporary employment contracts,



payment of over 10 thousand euros for per diems,



increased fuel expenses by nearly 40%,



increase in rent expenses.

Democrats had paid all reported campaign expenses by the end of 2020.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from the Democrats on inflows and outflows from 12 bank accounts during 2019 and 2020: three accounts of the head office, one account of the Women's Forum, one foreign currency account for regular financing and one foreign currency account for election financing, two business card accounts, four election accounts - for parliamentary elections, for local elections in Tivat, elections in Tuzi as well as for elections in Kotor, Budva, Andrijevica and Gusinje.

Transparency scores of financial operations

Total transparency score [51] of financing of the Democrats is 5. Transparency score of the regular operation financing of that party is 5, while the transparency score of the election campaigns financing is 4.99.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5	5	5	-
Head office	all statements submitted	all statements submitted	all statements submitted	no
	complete data available for 100% of transactions	complete data available for 98% of transactions	complete data available for 100% of transactions	-
	5	-	-	-
Women's Forum	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
	-	-	-	-
Municipal boards	no bank accounts	no	no	no
	-	-	-	-
Transparency score of the regular operation financing				5.0

[51] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

2.1.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5	-	-	-
2020 Elections	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Kotor	* joint report (KO, BD, AN)			
	5 *	-	-	-
Budva	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
	5	3	-	-
Tivat	all statements submitted	all statements submitted	no	no
	complete data available for 100% of transactions	complete data available for 1% of transactions	-	-
	5	-	-	-
Tuzi	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Andrijevisa	* joint report (KO, BD, AN)			
Gusinje	did not participate			
Transparency score of the election campaign financing				4.99
Total transparency score of the party financing				5.0

What is missing?

The Democrats informed us that the complete financial operations of that party take place through the head office, and that the municipal boards do not have separate bank accounts. In addition, that party informed us that it operates exclusively through bank accounts and that it does not have a treasury. Both were stated in the audit reports. [52] Statements from the foreign currency account used to finance the election campaign in Tivat do not contain enough data to determine the type of expenses, i.e. suppliers.

[52] www.dri.co.me/1/doc/Izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20Crne%20Gore%20za%202020.%20godinu.pdf and www.dri.co.me/1/doc/Izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Demokratske%20Crne%20Gore%20za%202019.pdf

2.2.

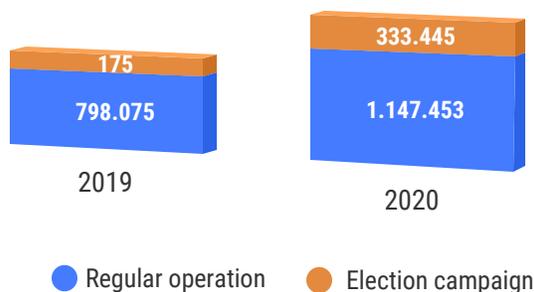
ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

The documentation published by the Democrats shows that their total revenues in 2019 were **nearly 800 thousand euros**.

In 2020, the revenues on the accounts for regular financing were **over 1.1 million euros**, and about 330 thousand euros was paid for the election campaign. [53]

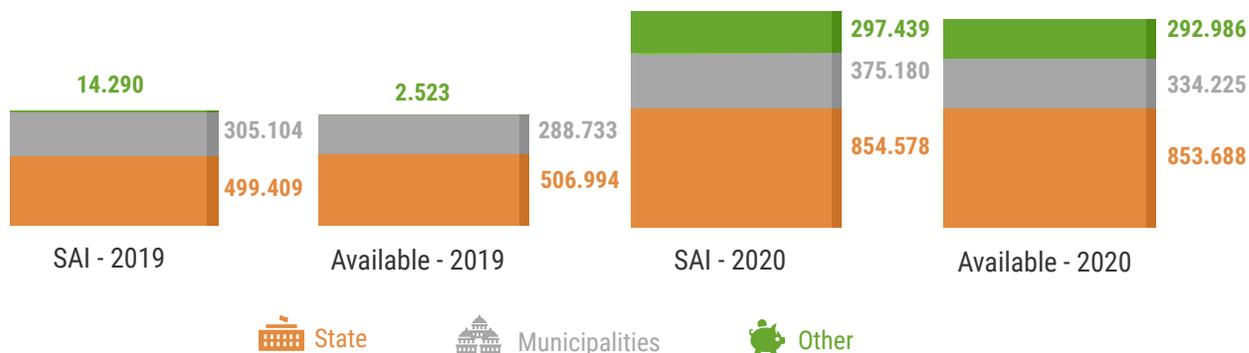
Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with auditor's data

According to the data from the SAI report, in 2019, the Democrats had less revenues from the state budget than the submitted data show, while in 2020, it was the other way around. These differences are larger in the case of revenues from local government budgets, especially in 2020, however, audit reports state that these are calculated but uncollected revenues.

Comparison of SAI data on total revenues with available information from available accounts in 2019 and 2020



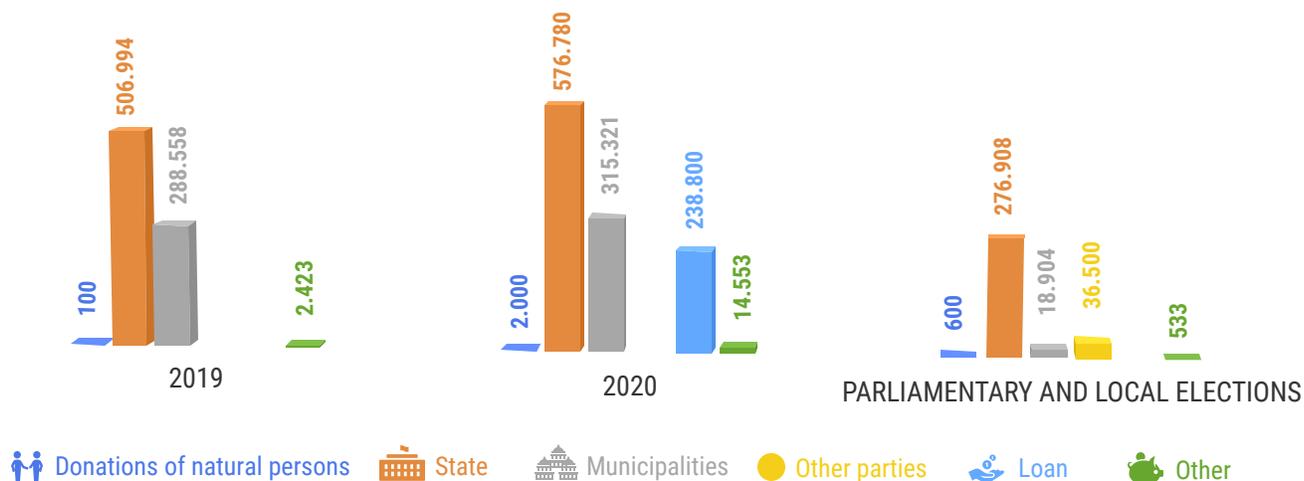
[53] These data differ from the information given in the SAI reports because they state the calculated revenues, while here it is about the collected revenues.

2.2.

Revenue sources

The greatest source of revenues for the Democrats is the state budget, followed by municipal budgets. During the election year, they took a bank loan, while part of the funds for the election campaign was paid by other parties.

Revenue sources in 2019 and 2020



In the election year, the Democrats took two loans in the amount of 200 thousand and 40 thousand euros. [54] The funds from the first loan were paid into the account for financing regular operation on October 1, and from the second loan on December 3.

On October 2, the Democrats transferred 50 thousand euros from the account for financing regular operation to the account for financing the election campaign, and on October 13, they transferred additional 134 thousand. In addition, on December 6, they transferred another 53.9 thousand euros from the account for financing the regular operation to the election account.

According to the SAI report, the contract shows that the purpose of the loan is to cover the expenses of the election campaign, but it can be seen from the Democrats' request that they asked for loans to "settle liabilities towards suppliers". [55] In addition, the report states that "it was a free assessment of the Bank that the Party requires loans to settle liabilities towards suppliers arising as a result of the election year and the preparation of the election campaign".

[54] Differences in recorded and paid loan amounts probably relate to the deduction of bank fees and other loan expenses.

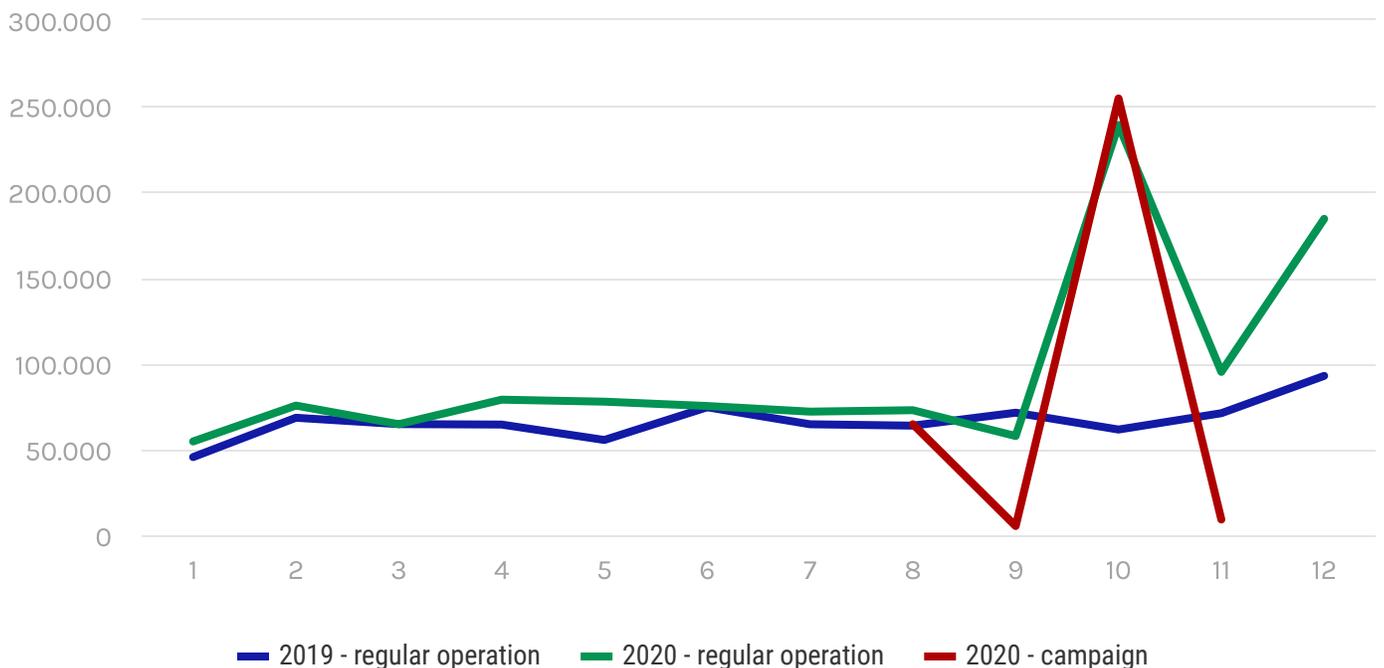
[55] Audit Report of Consolidated Annual Financial Statement of Democratic Montenegro for 2020, page 17.

Average monthly revenues and payment dynamics

During 2019 and in the first half of 2020, the average monthly income of the Democrats amounted to less than 70 thousand euros. In October 2020, revenues increased due to taking loans on the account for financing the regular operation. A smaller increase in December of that year also refers to increased payments from the state treasury, but also to taking an additional loan.

In August 2020, the state paid them the first part, and in October the second part of the funds for financing the election campaign, to a special bank account opened for those purposes.

All available revenues by months (2019 and 2020)



2.3.

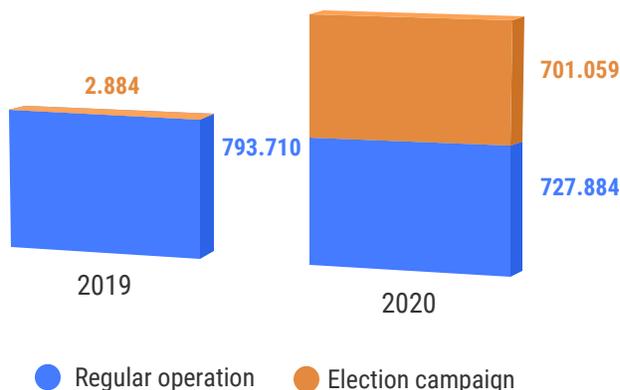
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

According to available bank account statements, the expenses of regular operation of the Democrats in 2019 amounted to **nearly 800 thousand**, and **nearly 730 thousand euros** in 2020.

The available expenses of the parliamentary and local elections were around 700 thousand euros.

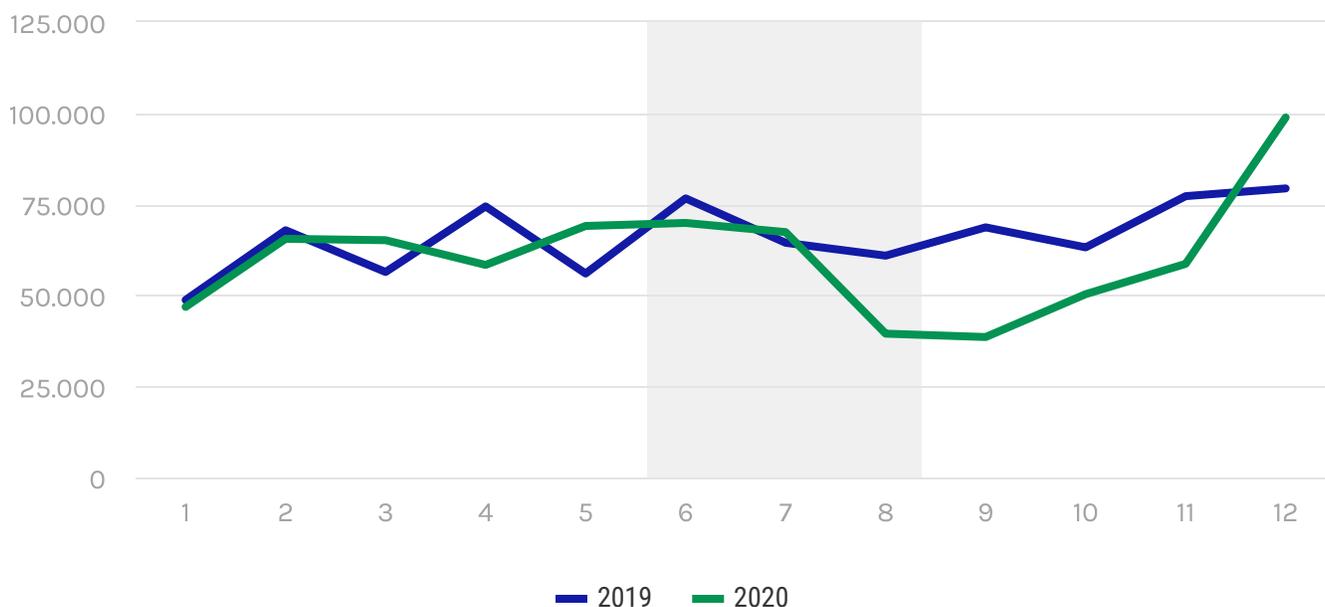
Available expenses of regular operation and election campaigns (2019 and 2020)



Monthly expenses

During the election campaign, Democrats did not have higher expenses of financing the regular operation compared to the same period of the previous year. In July 2020, the expenses were slightly higher than in the same month last year, and they were significantly reduced from August until December, when growth occurred.

Expenses of financing the regular operation, by months (2019 and 2020)

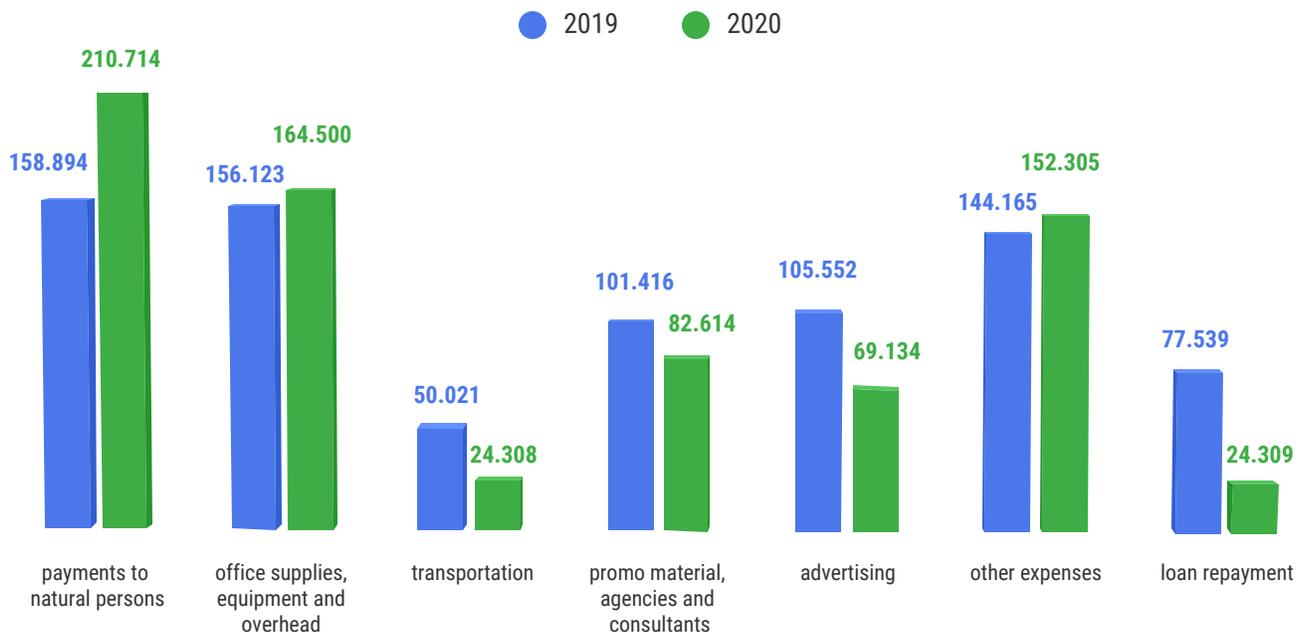


2.3.

Which expenses of regular operation increased in the election year and during the election campaign?

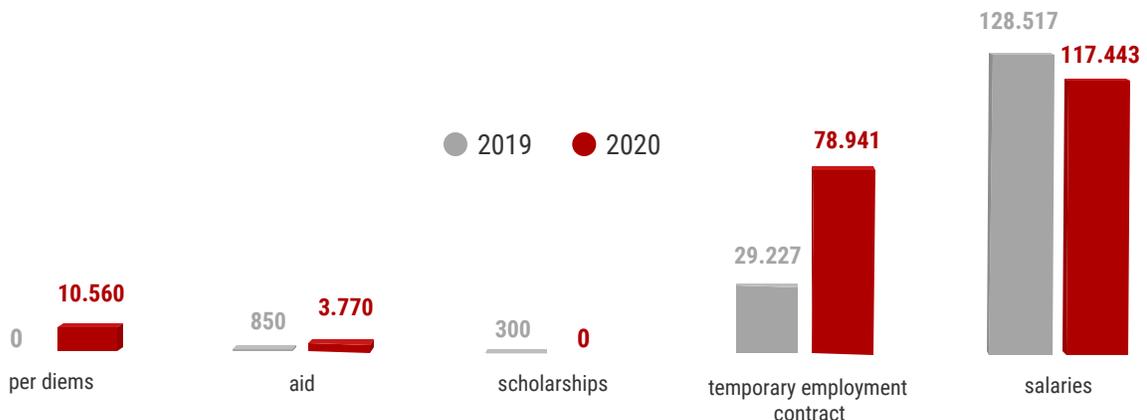
In the election year, payments to natural persons, expenses of office supplies, equipment and overhead increased, as well as other expenses. On the other hand, the expenses of transportation, promotional materials and advertising are lower in the election year than in the previous one.

Expenses of the regular operation, by categories (2019 and 2020)



Payments to natural persons. In the election year, payments based on per diems and temporary employment contracts increased.

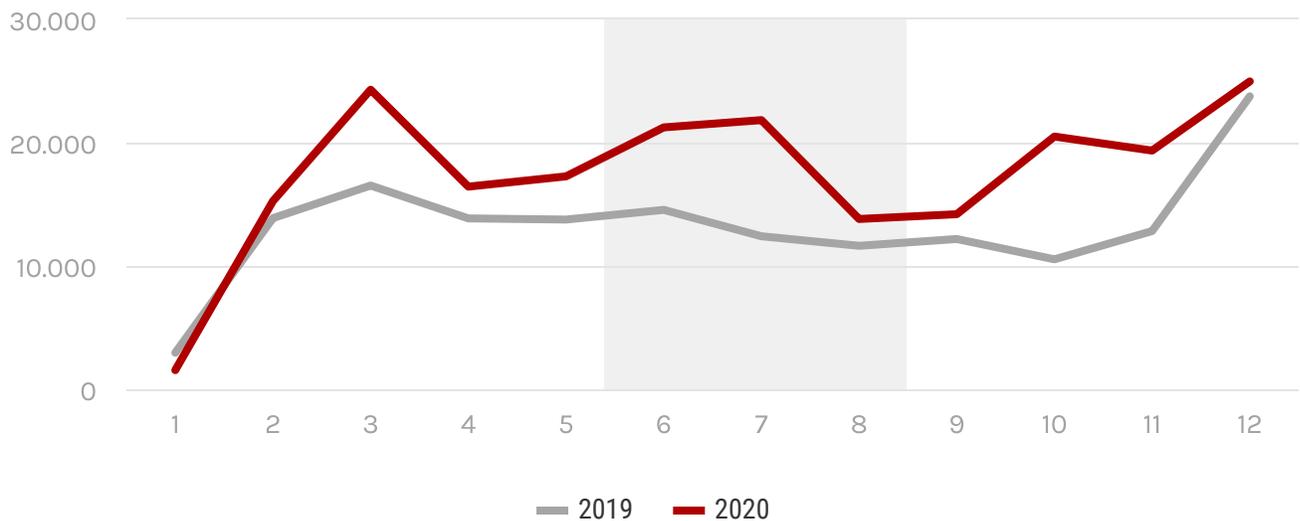
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



2.3.

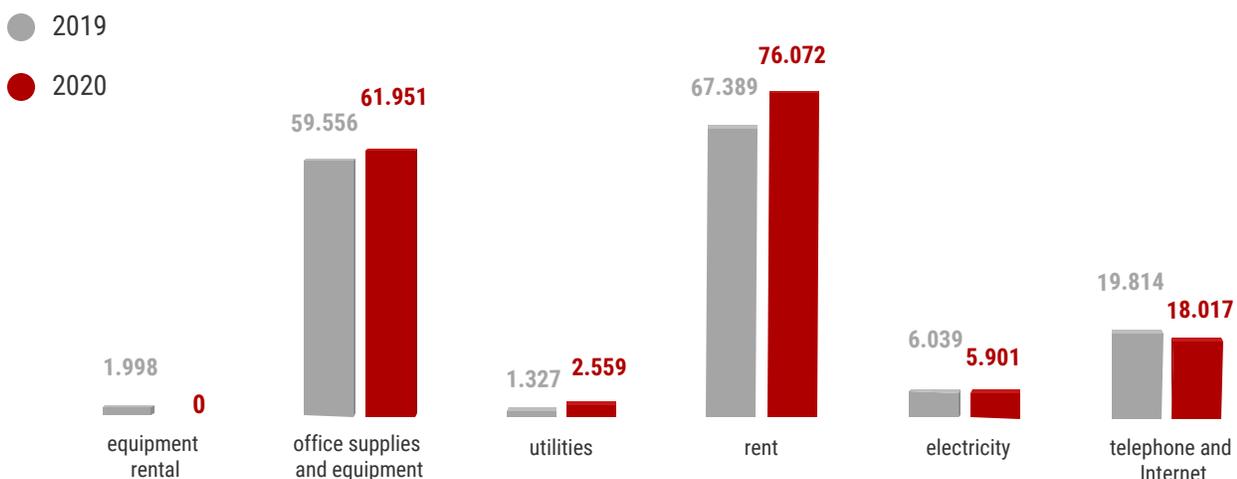
There has been a significant increase in payments to natural persons since March 2020, and in June and July, these amounts were almost twice as high than the previous year. It was similar during October and November of that year, when the amounts of payments to natural persons are significantly higher than in the same months of the previous year.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. The increase in this group of expenses occurred in July 2020, primarily due to increased expenses of rent and office supplies.

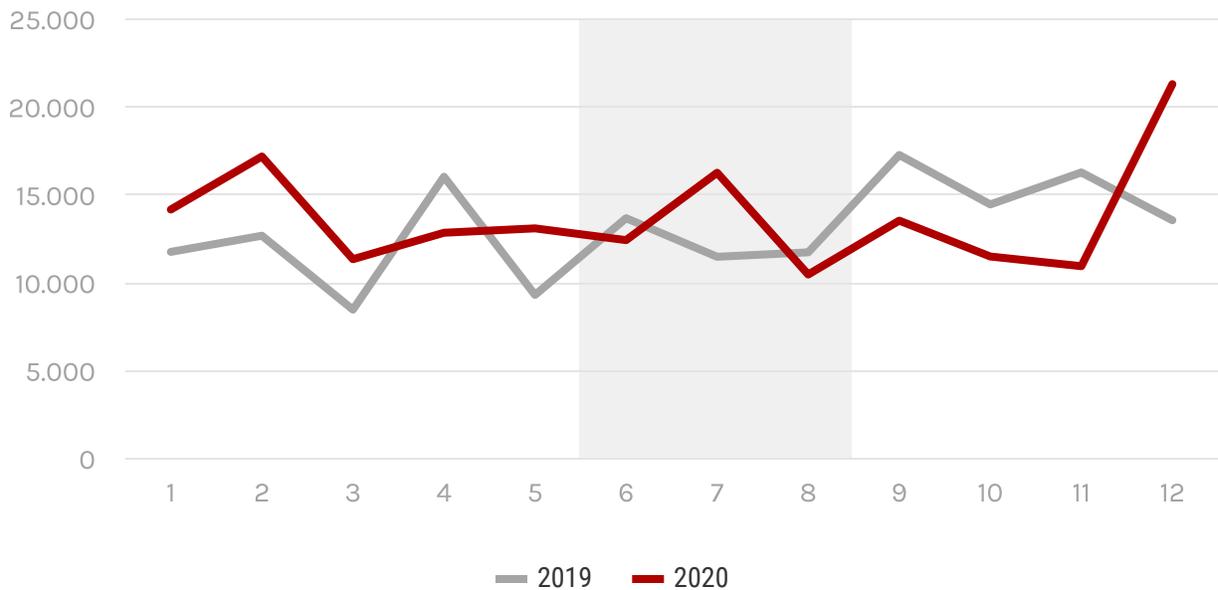
Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by types (2019 and 2020)



2.3.

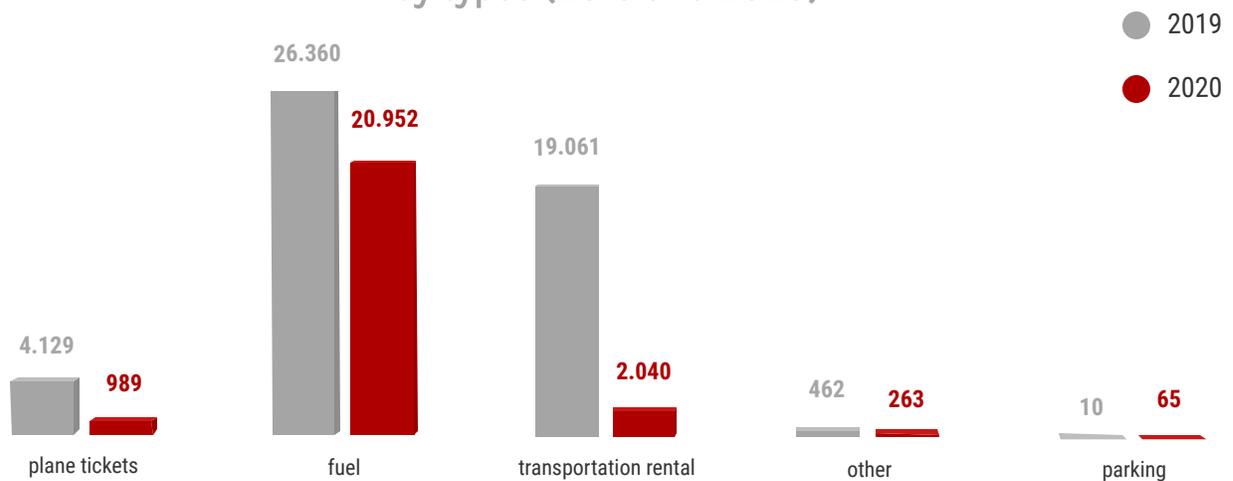
In July, payments to a natural person for rental expenses were doubled compared to the previous year. Also, there were more purchases of office supplies from various companies than in the same period of the previous year. The biggest increase in expenses is related to increased payments to the company Mercator CG Intersport, which sells sports equipment.

Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by months (2019 and 2020)



Transportation. In the election year, total transportation expenses paid from funds for financing the regular operation are lower than in the previous year.

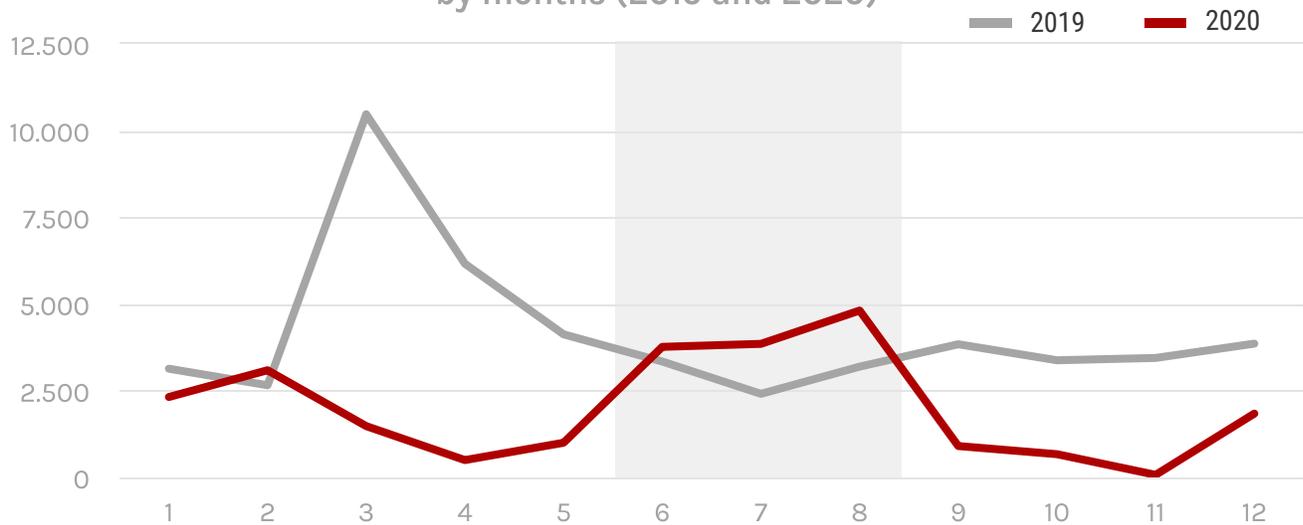
Transportation expenses from funds for financing the regular operation, by types (2019 and 2020)



2.3.

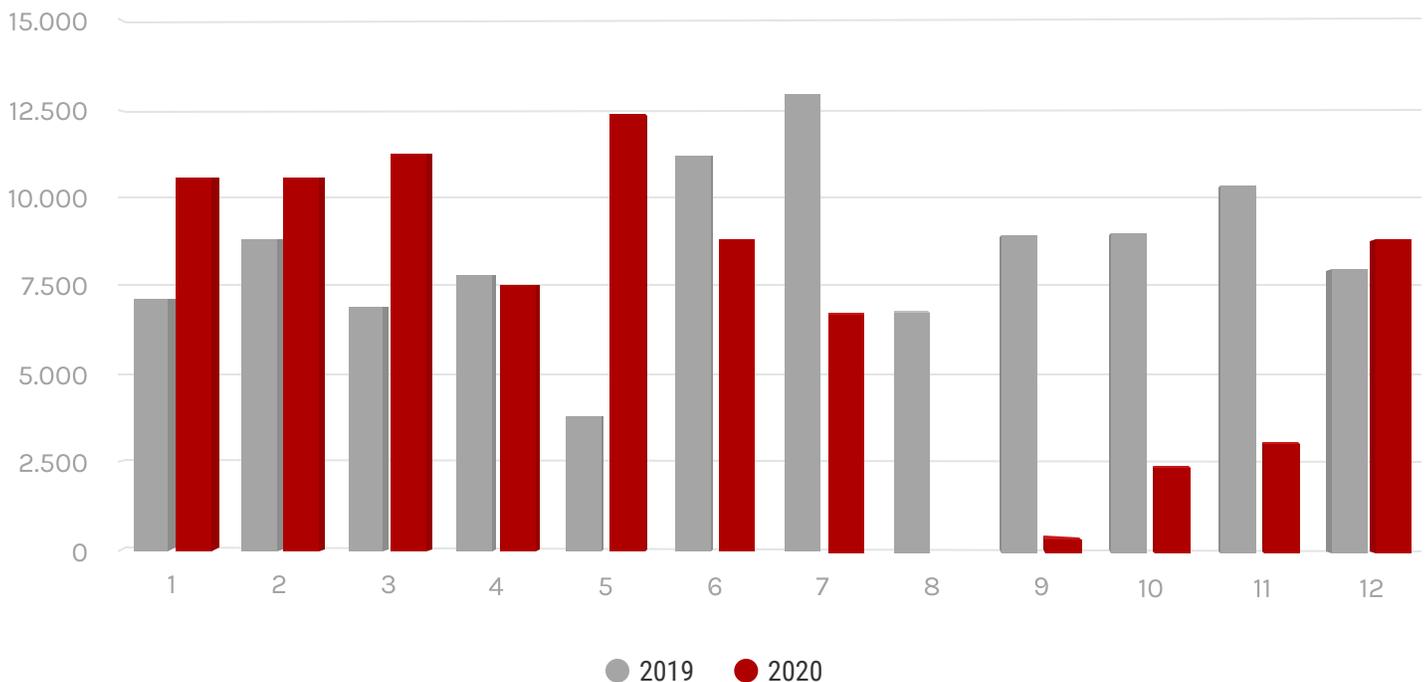
However, their increase occurred during July and August 2020, compared to the same period of the previous year. The reason for this increase are higher fuel expenses than in the same months of the previous year.

Transportation expenses from funds for financing the regular operation, by months (2019 and 2020)



Promotional material. During the election campaign, the expenses of producing promotional materials paid from the regular account were reduced.

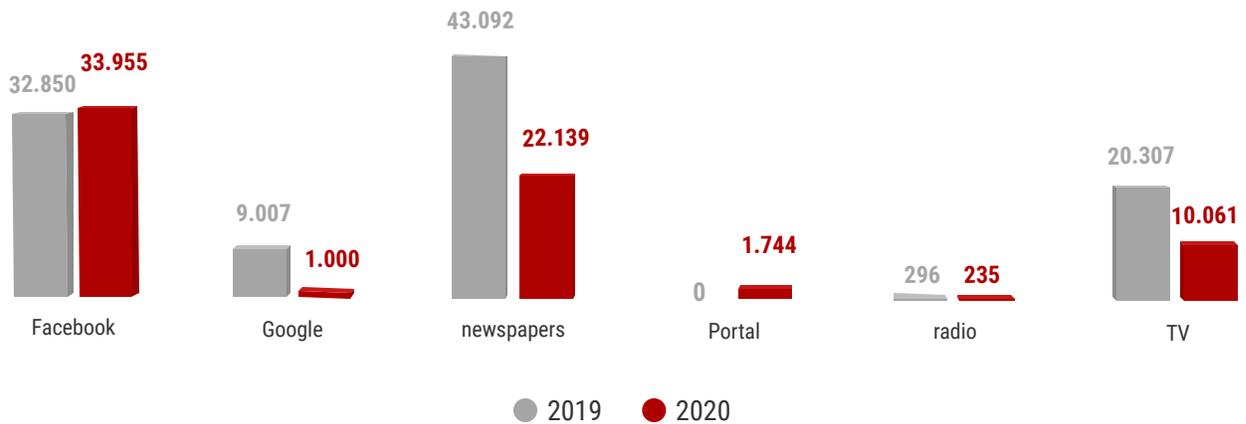
Expenses of promotional materials from funds for financing the regular operation, by months (2019 and 2020)



2.3.

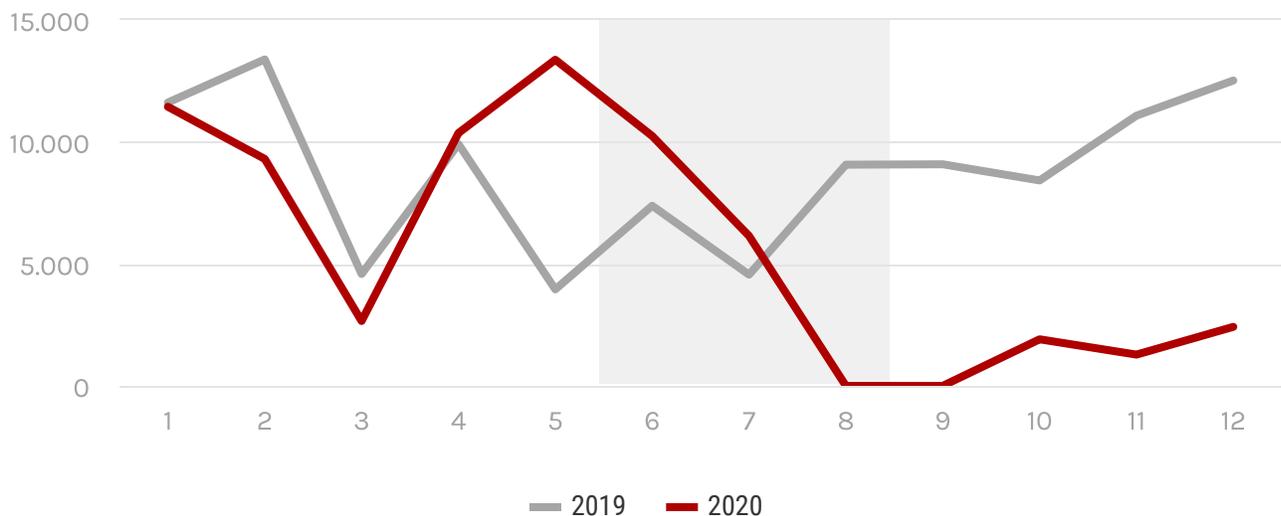
Advertising. In the election year, only the expenses of advertising on Facebook increased, while all other types of these expenses were lower.

Advertising expenses from the funds for financing the regular operation, by types (2019 and 2020)



Advertising expenses paid from the account for regular financing increased in June and July 2020 compared to the previous year, while in August and September, there were no expenses. In those two months of the election campaign, the expenses of advertising on Facebook, Vijesti Television, as well as in the daily newspaper Dan increased.

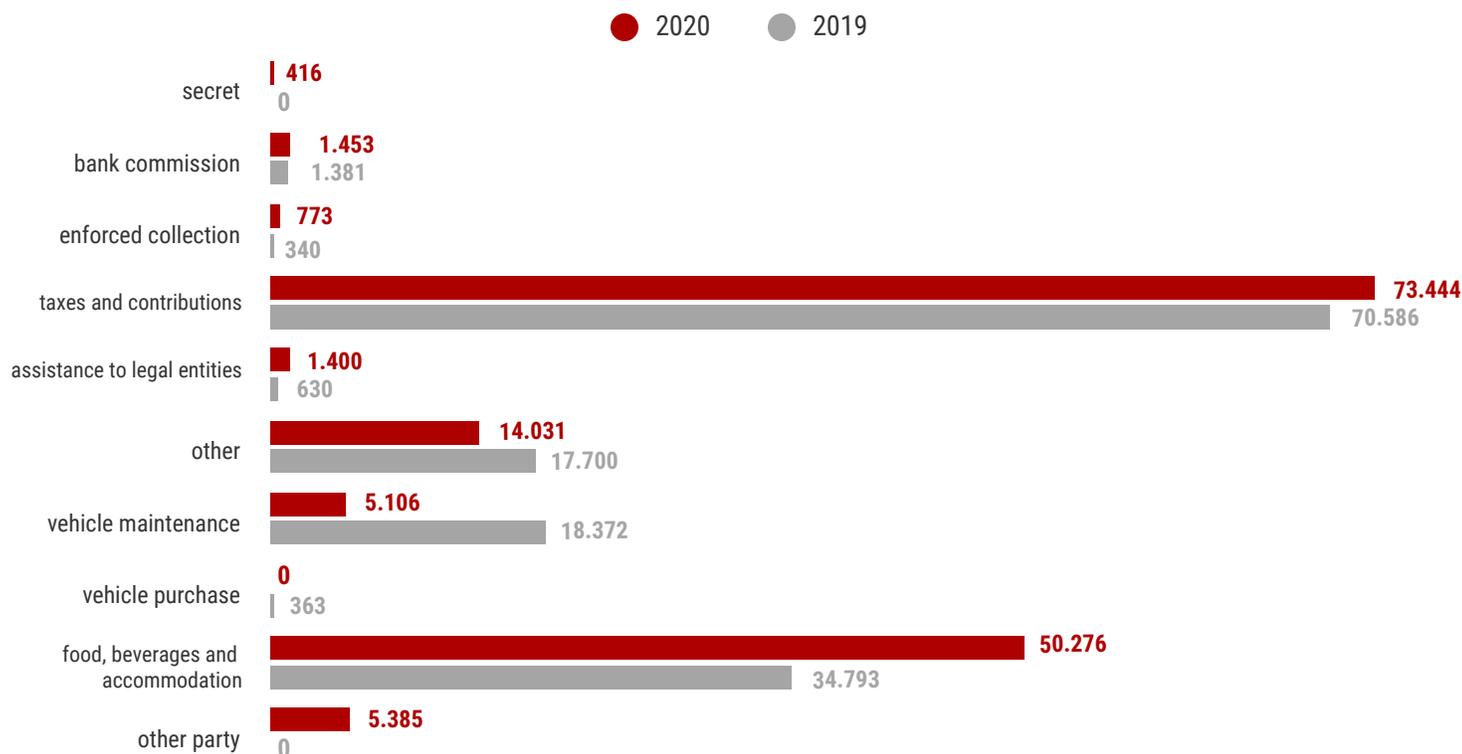
Advertising expenses from funds for financing the regular operation, by months (2019 and 2020)



2.3.

Other expenses. The expenses of food, beverages and accommodation paid from the account for regular operation were significantly higher in the election year than in the previous year, especially in July, at the beginning of the election campaign. There is also a smaller increase in expenses of taxes and contribution compared to the previous year. Other expenses of financing the regular operation of the Democrats in the election year were lower than in the previous one.

Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



Cash Money. The Democrats **do not have** a treasury, and according to available data, in two years, they withdrew a total of 20 euros in cash.

2.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

By the end of 2020, the Democrats had paid all the campaign expenses for the parliamentary elections, which they reported in their official report, from a special account opened for the purpose of financing that campaign.

D.3.

New Serb Democracy (NOVA)

New Serb Democracy had official revenues of 2.3 million euros in 2019 and 2020, with 1.8 million euros paid from public sources, i.e. by the state or municipalities.

That party is among transparent parties, with an average score of 4.7.

During the election campaign, NOVA paid significantly higher expenses of hotel accommodation than in the same period of the previous year.

Around 12,000 euros of expenses paid from the election account were not stated in the party's official report.

Two months after the parliamentary elections, NOVA owed 430 thousand euros in campaign expenses, although according to contracts with suppliers, those debts had to be settled by the end of September. Instead, members of the coalition "For the Future of Montenegro", whose finances were managed by NOVA, signed a protocol to share the liabilities to pay those debts.

By the end of August 2022, NOVA had not paid any of the debts it took over under the protocol, worth around 145 thousand euros, from any account of that party that is publicly available. These debts include:

- ⇒ over 81 thousand to a company Pink Media M for advertising on Pink M television;**
- ⇒ exactly 50 thousand euros to the Cypriot company Limanaki Studios for the production of promotional videos;**
- ⇒ over 15 thousand euros to the Society for Equality and Tolerance for advertising on Srpska TV.**

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from NOVA on inflows and outflows from 24 bank accounts during 2019 and 2020: two accounts of the head office, one account of the Women's Forum, 17 accounts of municipal boards, one account related to a business card, as well as one foreign currency account, and two election accounts - for the parliamentary and local elections in Budva. In addition, they provided us with data on 19 treasuries of municipal boards, as well as treasuries of the head office and treasuries of the Women's Forum.

Transparency scores of financial operations

Total transparency score [56] of financing of NOVA is 4.67. Transparency score of the regular operation financing of that party is 4.37, while the transparency score of the election campaigns financing is 4.99.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	-	5.00	4.00
Head office	all statements submitted	no	all statements submitted	99% of transactions submitted compared to SAI data
	complete data available for 100% of transactions	-	complete data available for 100% of transactions	complete data available for 98% of transactions, cash withdrawal from the account coincides with 76% of treasury inflows
	5.00	-	-	4.00
Women's Forum	all statements submitted	no	no	92% of transactions submitted compared to SAI data
	complete data available for 100% of transactions	-	-	complete data available for 100% of transactions, cash withdrawal from the account coincides with 97% of treasury inflows
	4.00	-	-	3.00
Municipal boards	98% of transactions submitted, data submitted for 17 out of 20 municipal boards - 85% (SAI)	no	no	98% of transactions submitted compared to SAI data, 19 treasuries of municipal boards submitted
	complete data available for 99% of transactions	-	-	complete data available for 99% of transactions, cash withdrawals from the account coincide with cash inflows for only 1 out of 19 treasuries
Transparency score of the regular operation financing				4.37

[56] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

3.1.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	5.00	-	-
2020 Elections	all statements submitted	all statements submitted	no	no
	complete data available for 100% of transactions	complete data available for 99% of transactions	-	-
Kotor	<i>other party was in charge of finances</i>		-	-
	5.00	-	0.00	-
Budva	all statements submitted	no	no card submitted (SAI 2020)	no
	complete data available for 100% of transactions	-	-	-
Tivat	<i>did not participate</i>		-	-
Tuzi	<i>did not participate</i>		-	-
Andrijevica	<i>other party was in charge of finances</i>		-	-
Gusinje	<i>did not participate</i>		-	-
Transparency score of the election campaign financing				4.99

Total transparency score of the party financing

4.67

What is missing?

According to the SAI data [57], 20 municipal boards of NOVA have their own bank accounts, and we were provided with information on spending for 17 of them. We were provided with financial documentation for 19 treasuries of municipal boards, but for only one of them, withdrawing of cash from the account coincides with the recorded cash inflows.

In addition, according to the SAI, NOVA used a business card to pay for the local election expenses in Budva, which it did not submit to us.

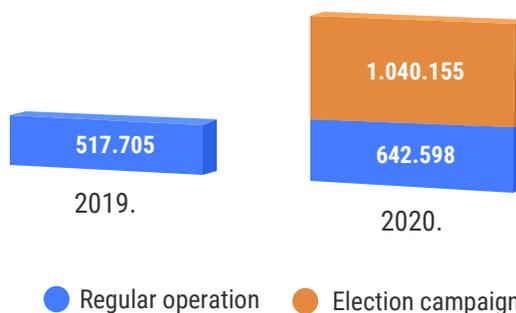
[57] <http://www.dri.co.me/1/doc/izvje%C5%A1tja%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1tja%20Nove%20s rpske%20demokratije%20za%202020.%20godinu.pdf>

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues published by NOVA in 2019 were **nearly 520 thousand euros**. In 2020, the revenues on the published accounts for regular financing were **over 640 thousand**, and over one million euros was paid for the election campaign.

Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with auditor's data

According to the report of the State Audit Institution [58], in 2019, NOVA had around 60 thousand euros more revenues from the state than the documentation provided by that party shows. This is revenue from the state budget that is directly transferred to the loan repayment account. It is the same in 2020, when the state directly paid nearly 50 thousand euros to settle NOVA's loan, so the data on financing from the budget given in the SAI report are higher for that amount than the publicly available documents of that party. [59]

On the other hand, according to published data, in 2019 and 2020, NOVA had higher payments from municipal budgets than the SAI reports show. However, it is probably about calculated but uncollected revenues from local self-governments.

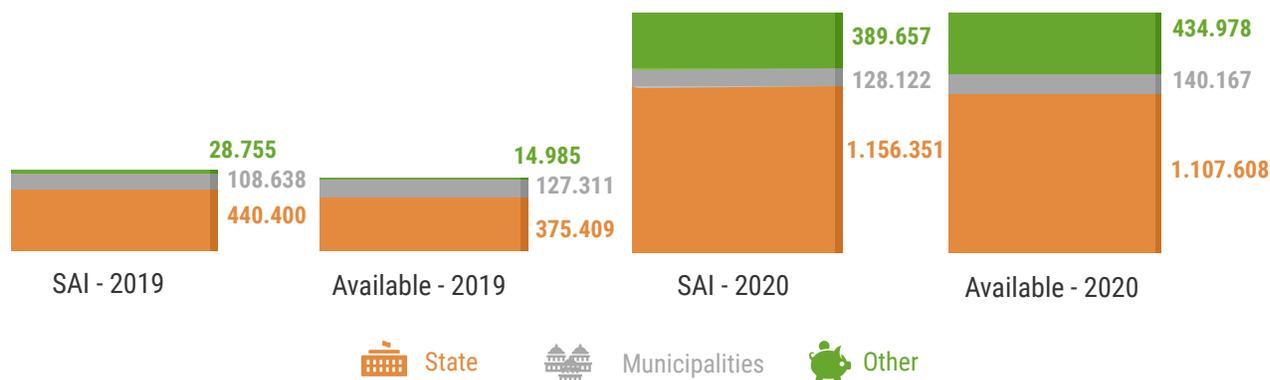
Available data of NOVA show that in 2020, that party had around 45 thousand euros more revenues from other sources than stated in the SAI report. In 2019, it was the other way around, thus, NOVA's data show 14 thousand euros less revenues that are not from state and municipal budgets, which can be seen from the SAI documentation.

[58]<http://www.dri.co.me/1/doc/izvje%C5%A1tajo%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Nove%20srpske%20demokratije%20za%202019.%20godinu.pdf>

[59]<http://www.dri.co.me/1/doc/izvje%C5%A1tajo%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Nove%20srpske%20demokratije%20za%202019.%20godinu.pdf>

3.2.

Comparison of SAI data on total revenues with available information from available accounts in 2019 and 2020



Revenue sources

The greatest part of NOVA's official revenues comes from the state and municipalities, while donations were paid almost exclusively to finance the election campaign.

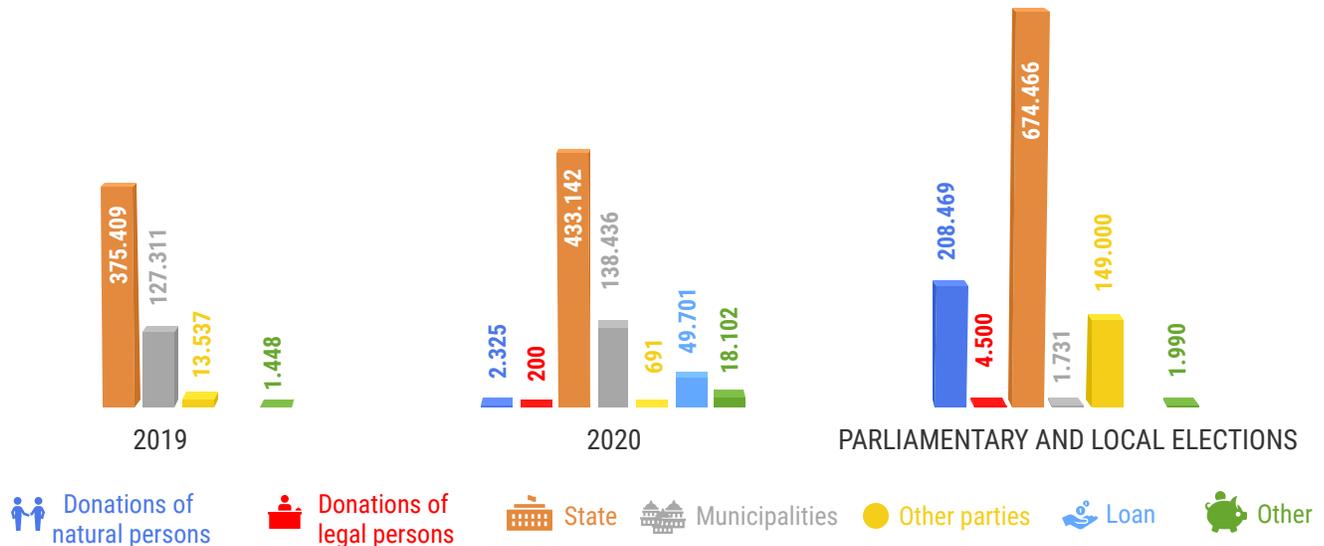
Since NOVA managed the account of the Democratic Front for financing the parliamentary elections, other parties, members of that coalition, paid nearly 150 thousand euros to it. Of that, 138 thousand was paid into a separate account to finance the campaign for the parliamentary elections, as follows:

- ➔ SNP - 75 thousand,
- ➔ DNP - 37 thousand,
- ➔ PZP - 15 thousand,
- ➔ Women's Forum of PzP - six thousand and
- ➔ Radnička - five thousand euros.

In addition, NOVA transferred 71,000 euros from the head office account to the election account, as well as additional 2,000 from the Women's Forum account. Before closing the election account, on December 10, 2020, NOVA transferred 35,000 euros from it to its account to finance the party's regular operation.

3.2.

Revenue sources in 2019 and 2020



According to available data, funds from municipal budgets were mainly transferred to the account of municipal boards, but some municipal payments also went to the head office account. [60] The largest payments were from the Capital City Podgorica and Budva, which paid additional funds in 2020, based on the financing of the campaign for local elections in that town. Funds were partially transferred from the head office account to bank accounts of the municipal boards.

On August 27, 2020, three days before the elections, a loan of 50 thousand euros was paid into the account for financing the regular operation of NOVA. **In its report, SAI concludes that it is a loan for maintaining liquidity, and not for financing the elections.** [61] However, on the same day that the loan was paid into the account of the party head office, those funds were transferred to the account for financing the election campaign.

[60] For example, the municipalities of Bijelo Polje, Plužine, Šavnik, while in the case of Budva and Herceg Novi, funds from the municipal budget were paid into the account of the head office and the accounts of the municipal boards.

[61] Audit Report of Consolidated Annual Financial Statement of New Serb Democracy for 2020, page 26.

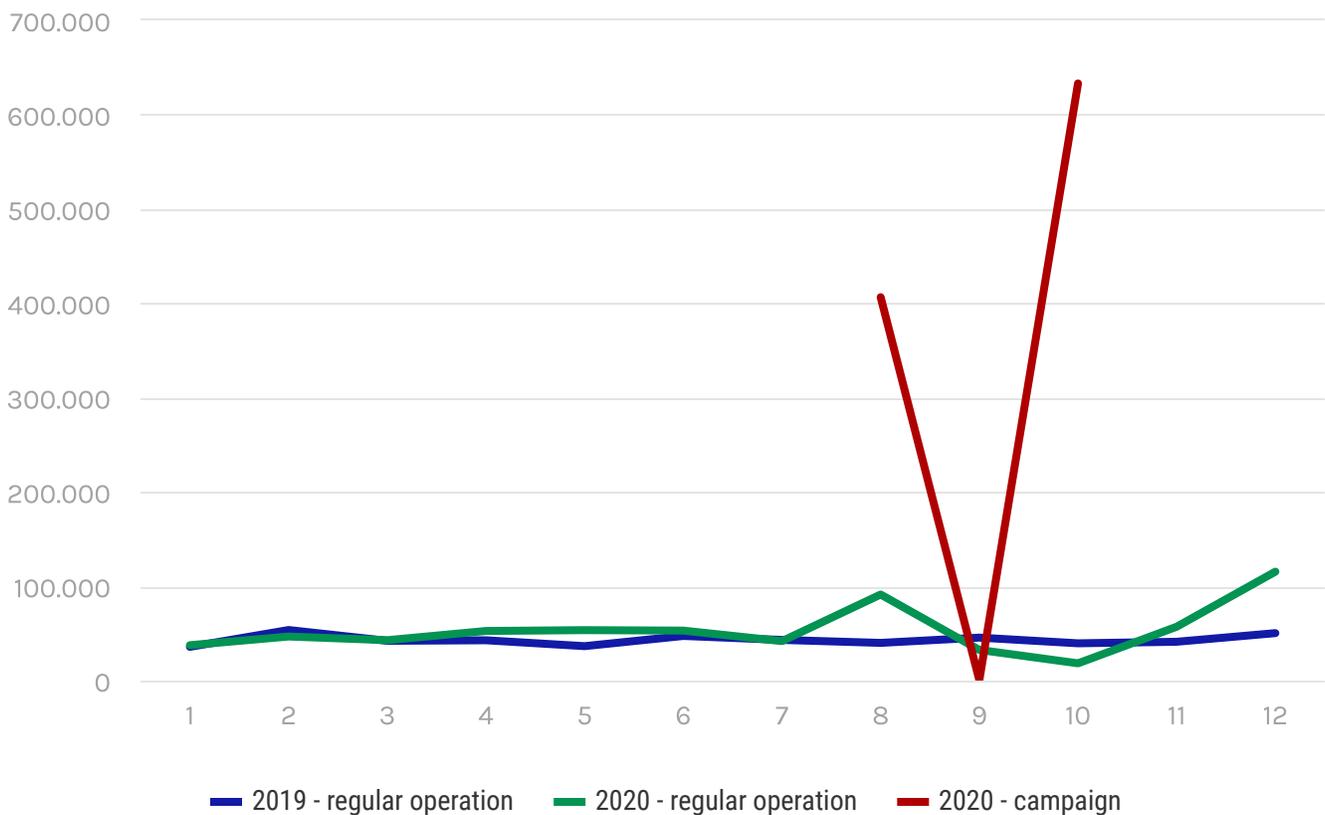
3.2.

Average monthly revenues and payment dynamics

In the last two years, the average monthly revenues for regular operation of NOVA were around 48 thousand euros, except in August 2020, when they increased due to loans, as well as at the end of the year, when the state paid them slightly more funds from the budget.

Revenues on the separate account for financing the election campaign increased in August due to a significant amount of donations, payments from other parties, transfer of funds obtained from loans, as well as additional state funds to finance the campaign for the parliamentary elections. In October, the state paid the remaining funds for the campaign expenses to that account.

All available revenues by months (2019 and 2020)



3.3.

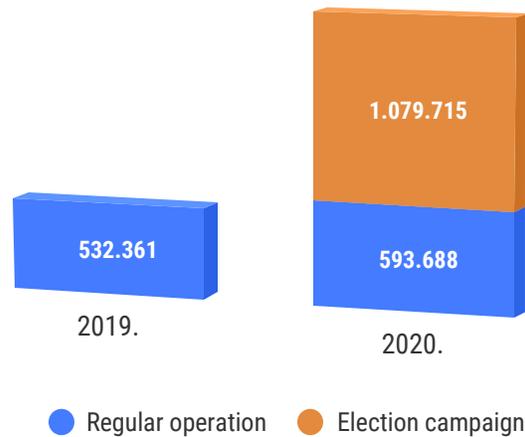
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

In 2019, the expenses of regular operation of NOVA amounted to **around 530 thousand euros**, and to **over 590 thousand euros** in 2020.

The reported expenses of the parliamentary and local elections in Budva were over 1 million euros.

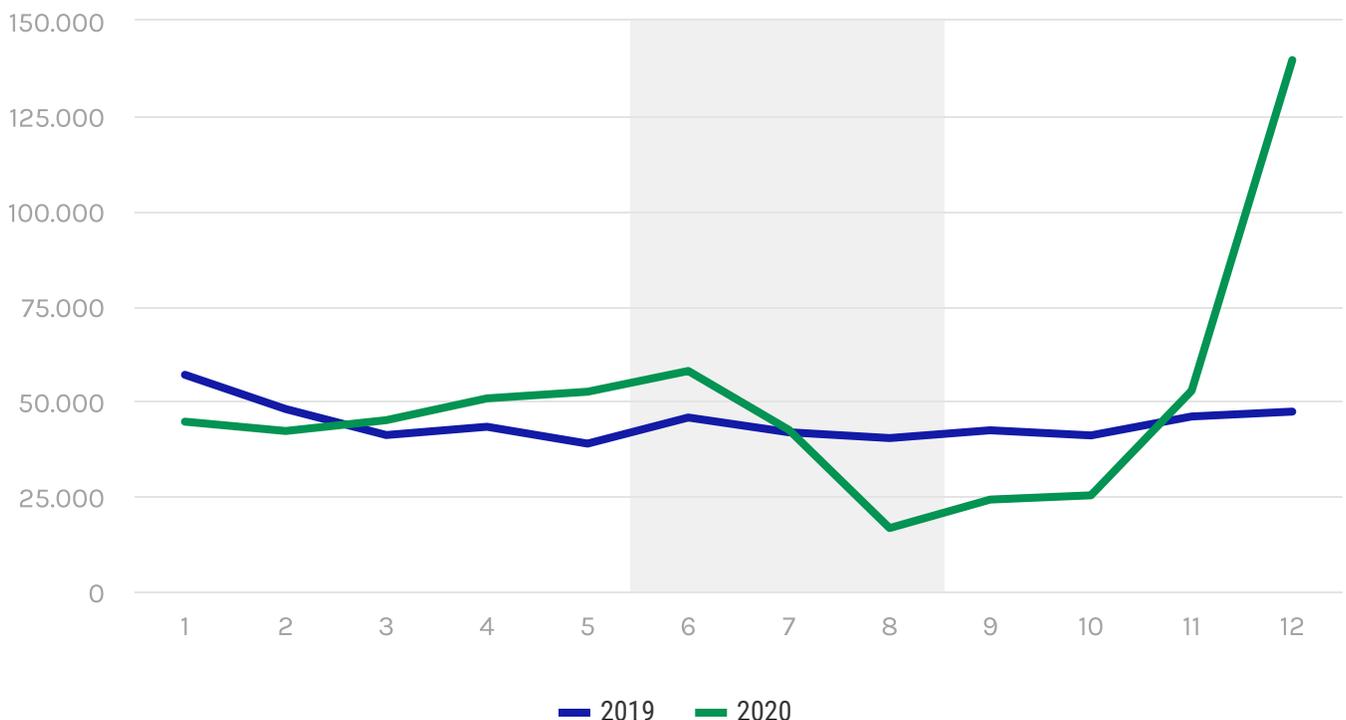
Available expenses of the regular operation and election campaigns (2019 and 2020)



Monthly expenses

In April, May and June 2020, NOVA had increased expenses of financing the regular operation compared to the same period of the previous year. In August 2020, when the elections were held, the expenses of regular operation fell sharply, while in November and December there was a big increase.

Expenses of financing the regular operation, by months (2019 and 2020)

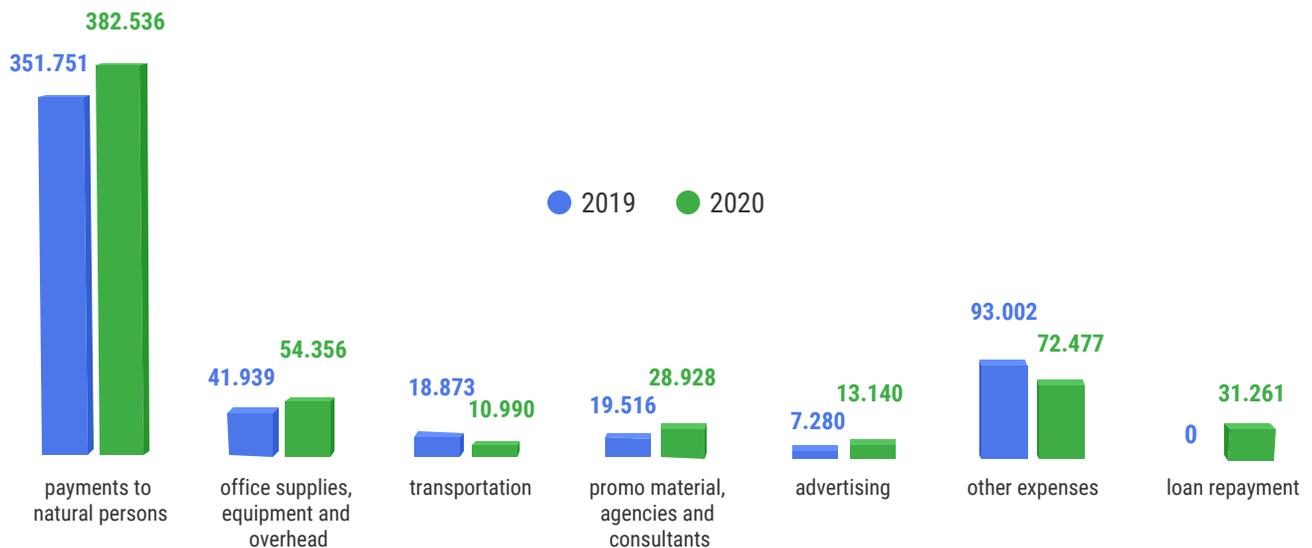


3.3.

Which expenses of the regular operation increased in the election year and during the election campaign?

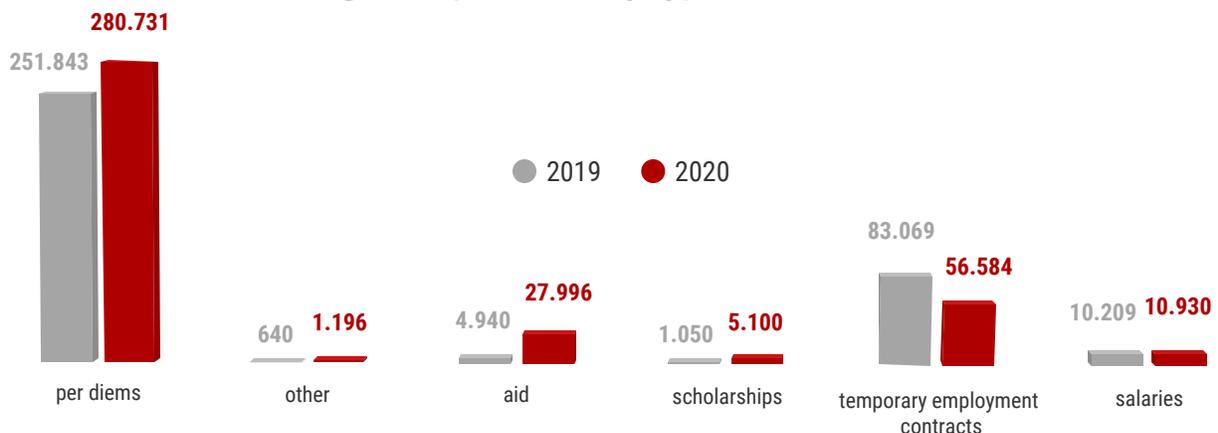
The largest expenses of regular financing relate to payments to natural persons that are slightly higher in the election year. The expenses of office supplies, equipment and overhead, promotional materials, advertising on social networks and in the media increased, and the party started to repay the loan taken to finance the elections.

Expenses of the regular operation, by categories (2019 and 2020)



Payments to natural persons. In the election year, the payments of per diems and aid from the funds for financing the regular operation of NOVA increased.

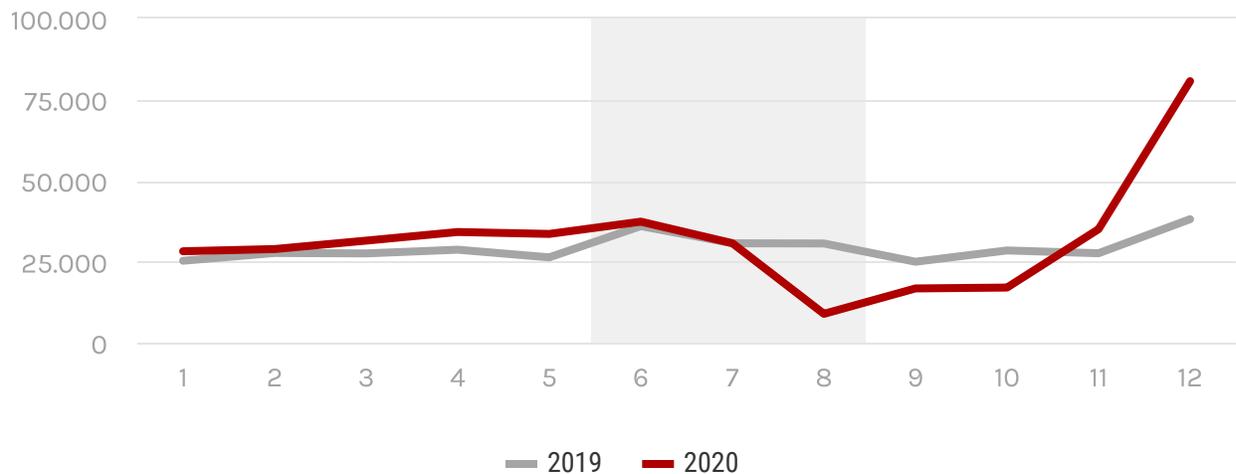
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



3.3.

In the first half of the election year, more funds were paid to natural persons from the funds for financing the regular operation than in the previous one. In June and July 2020, payments were at the same level, they decreased significantly in August, and they were also lower in September and October 2020 than in the same period of the previous year. Only in November, and especially in December, payments to natural persons from the funds for regular operation increased sharply.

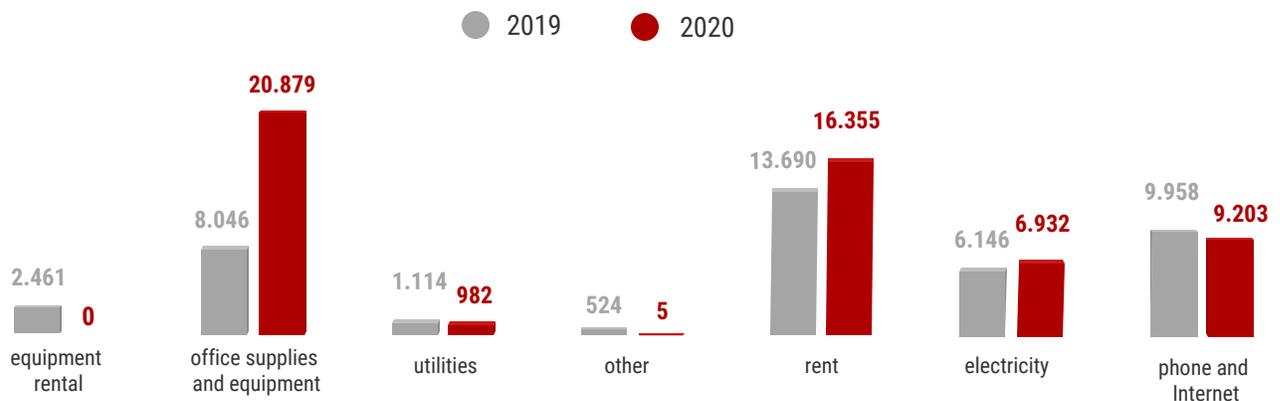
Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. In the election year, the expenses of overhead paid from the account for regular financing are around 13 thousand euros higher than in the previous one. The largest increase relates to the expense of office supplies and equipment that have doubled. The increase in these expenses occurred before the election campaign, mainly due to increased payments to the company Hardnet LLC from Nikšić, which deals with sale of computers, mobile phones and similar equipment, as well as the maintenance of computer systems and video surveillance. [62]

In the election year, the expenses of rent and electricity are slightly higher.

Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by types (2019 and 2020)

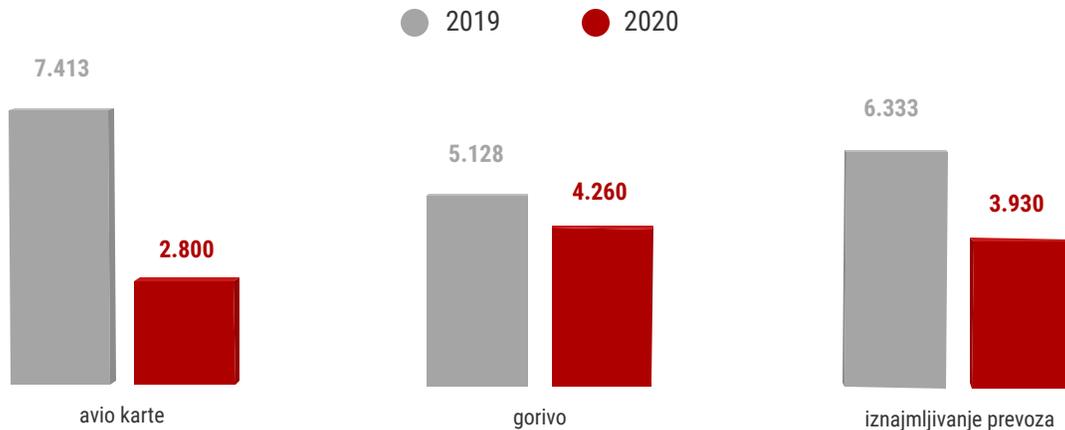


[62] <https://hardnet.me/>

3.3.

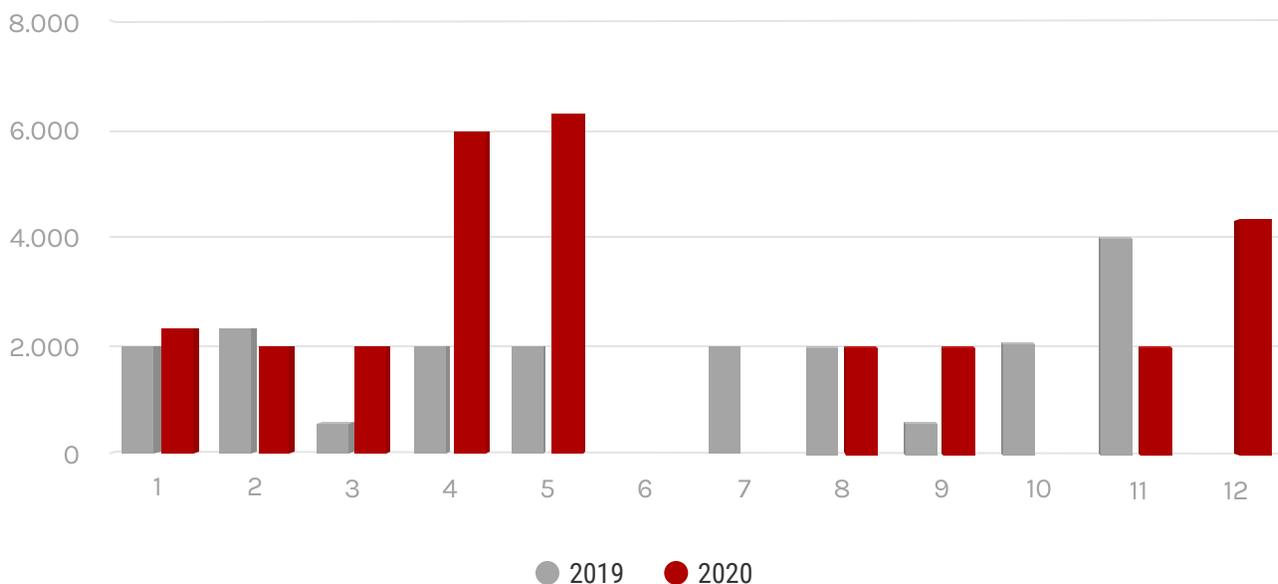
Transportation. Transportation expenses are lower in the election year than in the previous one.

Transportation expenses from funds for financing the regular operation, by types (2019 and 2020)



Promotional material. In April and May 2020, the expenses of promotional material paid from the account for regular financing of the party increased compared to the previous year. The increase was due to payments to the company Đoković LLC, which provides billboard advertising services, as well as to the company Ras Press, which produces printed materials.

Expenses of promotional material from funds for financing the regular operation, by months (2019 and 2020)



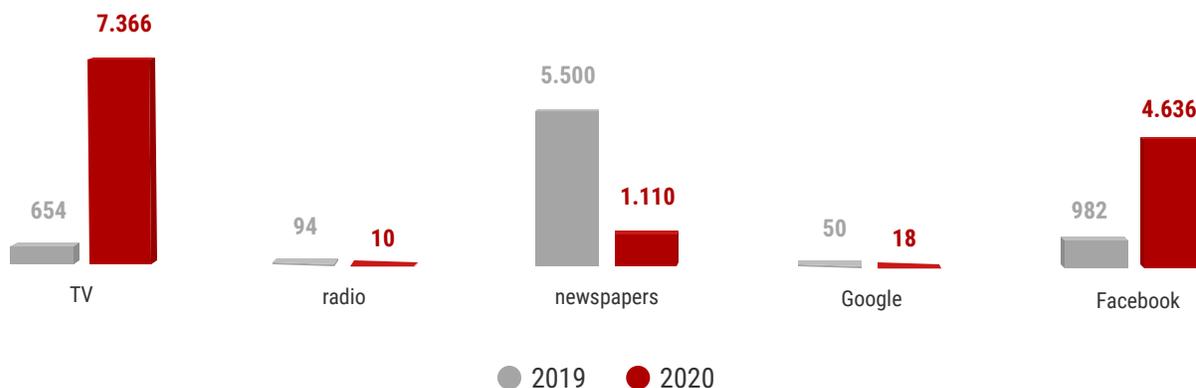
3.3.

Advertising. In the election year, the expenses of advertising on Facebook paid from the account for regular financing increased significantly, especially in May 2020, before the start, but also in June and July, during the election campaign. In same months of the previous year, there were no expenses of Facebook advertising paid from the account for regular operation.

The expenses of advertising on TV Vijesti also increased, and were paid from the account for regular financing in December 2020, after the elections.

The expenses of advertising in newspapers are significantly lower in the election year, while there was practically no advertising on the radio and on Google from the funds for financing the regular operation.

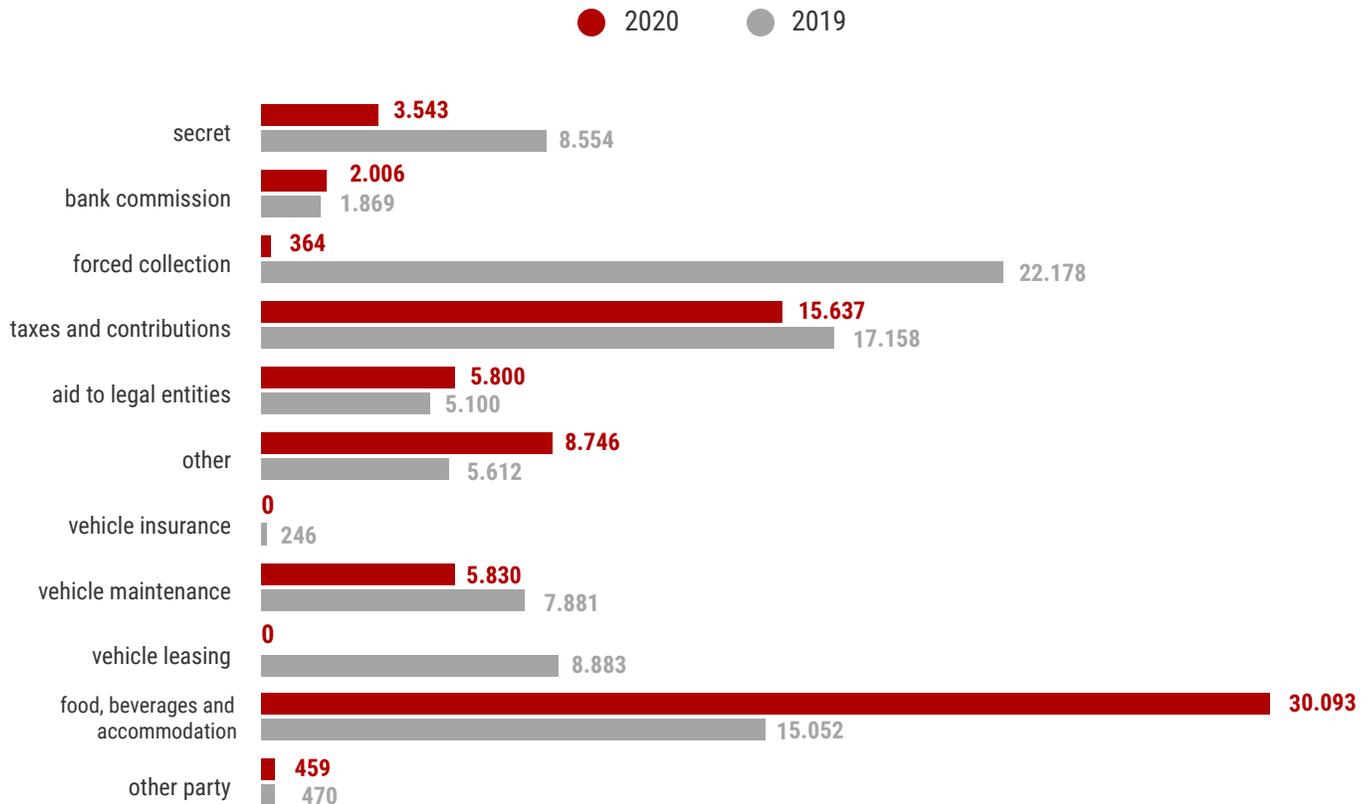
Advertising expenses from the funds for financing the regular operation, by types (2019 and 2020)



Other expenses. During June and July 2020, the accommodation expenses paid from the account for regular financing, related to the stay in the Budva Riviera, increased significantly (over 11 thousand euros in June and July 2020, while in the same period of the previous year, there were no such expenses). At the same time, there was a decrease in leasing costs, as well as forced collection, thus the total amount of other expenses is the same in the election year and the previous year.

3.3.

Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



It was not possible to identify the supplier or the purpose for some of the costs from the available data, thus, they were marked as secret.

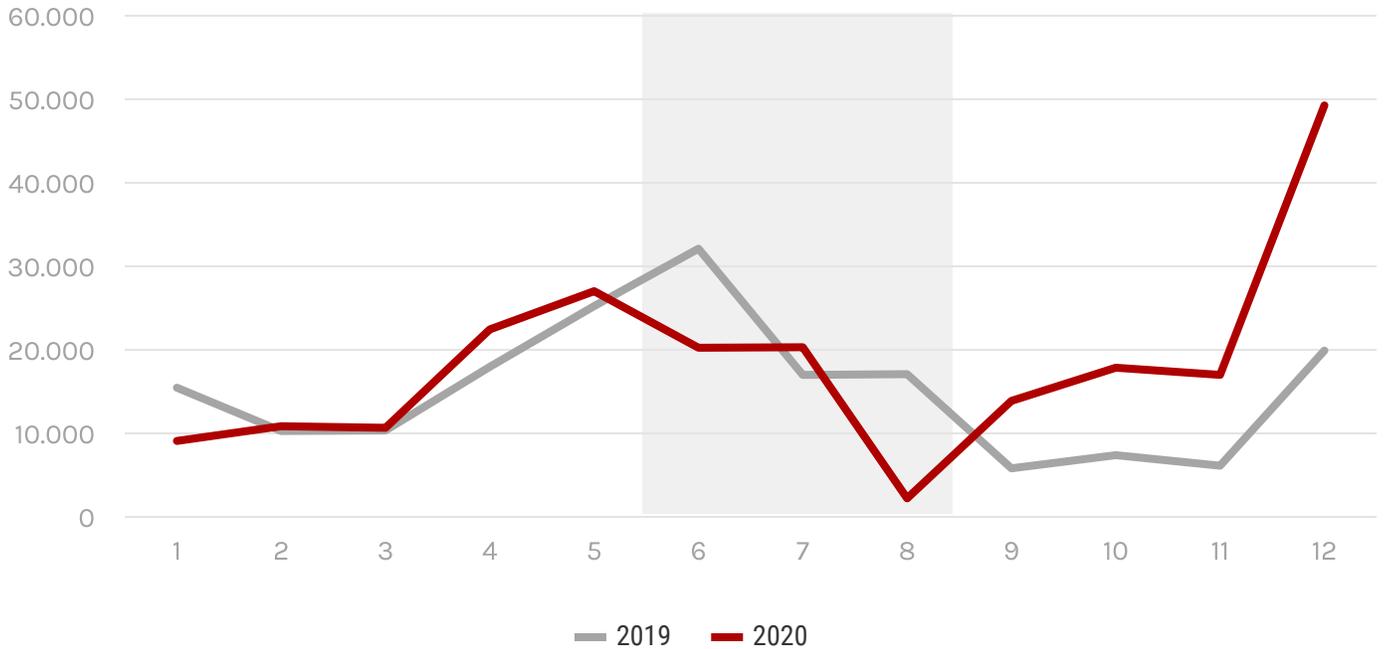
Cash money. In two years, NOVA withdrew over 400 thousand euros in cash from the account for financing the regular operation.

During the election year, nearly 220 thousand euros was withdrawn from the account for regular operation, and in the previous year, around 180 thousand was transferred to treasuries.

After the elections, and especially in December 2020, NOVA withdrew significantly more cash from the account for financing the regular operation than in the same months of the previous year.

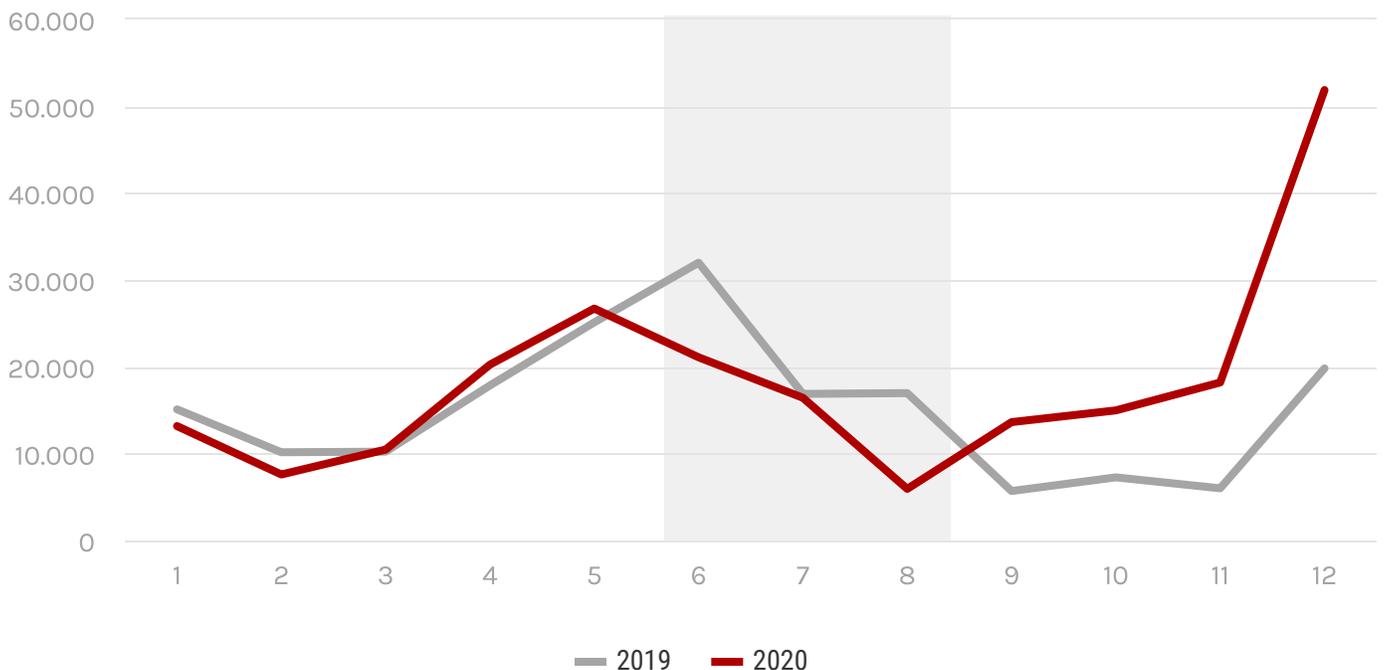
3.3.

Dynamics of cash withdrawal from funds for financing the regular operation, by months (2019 and 2020)



At the end of the election year, the consumption of cash from the treasury increased significantly, which was lower during the election campaign than in the same period in 2019.

Dynamics of cash consumption from funds for financing the regular operation, by months (2019 and 2020)



3.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

NOVA managed the finances for the election campaign of a large number of political entities gathered within the coalition "For the Future of Montenegro". Total official campaign expenses reported by NOVA were 1,500,679 euros.

Expenses worth a total of 1,044,985 euros were paid from the account for financing the election campaign, and the day before its closure, the remaining 35,145 euros was transferred to the account for financing the regular operation of NOVA.

Debts at the time of closing the election account

When the election account was closed on December 11, 2020, total amount of campaign expenses that were not paid was over 450 thousand euros.

Name of supplier	Reported expense	Paid from the election account	Remaining
Pink Media M	296.664	52.000	244.664
Limanaki Studios LTD	50.000	-	50.000
Television Vijesti	335.193	287.000	48.193
Daily press (newspaper and portal Vijesti)	122.298	90.000	32.298
Montenegro Post	91.497	70.750	20.747
Đoković	100.575	80.000	20.575
A Media Team (TV Atlas)	54.238	35.000	19.238
Society for Equality and Tolerance (Srpska TV)	18.323	3.000	15.323
Jumedia Mont (newspaper Dan)	39.915	35.000	4.915
Total			455.953

Protocol on the settlement

At the end of October 2020, one month before NOVA closed the election account, the constituents of the coalition "For the Future of Montenegro" signed a Protocol by which they share their liabilities to suppliers in the election campaign, as well as additional advertising services provided after the elections.

3.4.

Подгорица
21.10.2020. године

21.10.20

ДЕМОКРАТСКА НАРОДНА ПАРТИЈА
ЦРНЕ ГОРЕ
Број 659/20
Подгорица 21.10.2020. год.

ПРОТОКОЛ О СРАВЊЕЊУ

ЧЛАН 1

Овим Протоколом се дефинише испуњење заједничких обавеза, између конституената Коалиције ЗА БУДУЋНОСТ ЦРНЕ ГОРЕ, Нове српске демократије, Покрета за промјене и Демократске народне партије, Социјалистичке народне партије, Праве Црне Горе, Уједињене Црне Горе и Радничке партије насталих као заједнички трошкови поводом изборне кампање и накнадне услуге рекламе "ХВАЛА ТИ ЦРНА ГОРО" (15.000,00€) ових политичких субјеката

ЧЛАН 2

Потписници овог Протокола се обавезују да предметне обавезе, КОЈЕ ИЗНОСЕ 434.555,64 измире на следећи начин:

НСД		
	PINK MEDIA M	81.513,29
	LIMANAKI STUDIO	50.000,00
	DRUSTVO ZA RAVNOPRAVNOST	15.322,50
	УКУПНО	146.835,79

ПЗП		
	PINK MEDIA M	81.575,44
	УКУПНО	81.575,44

ДНП		
	PINK MEDIA M	81.575,44
	УКУПНО	81.575,44

СНП		
	DAILY PRESS DOO	28.706,14
	TV VIJESTI	40.193,05
	DJOKOVIC DOO	8.956,42
	УКУПНО	77.855,61

ПЦГ		
	DAILY PRESS DOO	10.000,00

3.4.

	ZEN MASTER PRODUCTION DOO	3.002,40
	JUMEDIA MONT DOO- DAN	1.000,00
	DJOKOVIC DOO	1.568,72
	УКУПНО	15.571,12
УЦГ		
	A MEDIA TIM	9.237,66
	JUMEDIA MONT DOO- DAN	2.914,88
	DJOKOVIC DOO	3.418,58
	УКУПНО	15.571,12
РП		
	DJOKOVIC DOO	10.575,20
	DAILY PRESS DOO	1.592,19
	JUMEDIA MONT DOO- DAN	1.000,00
	A MEDIA TIM	1.347,45
	DJOKOVIC DOO	1.056,28
	УКУПНО	15.571,12

Овај протокол ступа на снагу 21.10.2020. године и има снагу извршне исправе

Нова српска демократија Андрија Мандић

Покрет за промјене, Небојша Медојевић

Демократска народна партија, Милан Кнежевић

Социјалистичка народна партија, Владимир Јоковић

Права Црна Гора Марко Милачић

Уједињена Црна Гора Горан Даниловић

Радничка партија Максим Вучинић

Photo 6: Protocol on the settlement of liabilities between the constituents of the coalition "For the Future of Montenegro"

In the case of Đoković company, whose owner is in the management of NOVA, the debts stated in the protocol are higher than the unpaid expenses of the election campaign, probably because they refer to subsequent advertising services which are also the subject of the protocol.

3.4.

Has the Law on the Financing of Political Entities and Election Campaigns been violated?

The Law stipulates that after settling all liabilities, the political entity shall transfer the unspent funds to its regular account by the time the separate account is closed. [63] **Prior to its closing, NOVA transferred funds from the election account to its regular account, although it did not settle all liabilities.**

It is prescribed that all payments of election campaign expenses shall be carried out by the political entity via that account, until the account is closed. [64] At the same time, the law obliges political entities to close that account within 90 days from the day the final election results are announced. [65] A fine has also been defined for entities that do not pay election campaign expenses from a separate account until the account is closed. [66]

However, the law does not prescribe the obligation of political entities to pay all campaign expenses within a certain period of time, and it does not define the manner of payment of remaining debts after the obligatory closing of the election account.

Protocol contrary to contracts with suppliers

All campaign expenses had to be paid by the end of September, according to agreements signed by the coalition "For the Future of Montenegro" with suppliers. The question arises as to why some suppliers allowed deferred payment of debts to this coalition, which was not provided for in the price lists and advertising conditions that were officially published.

The contracts state that the deadlines for payment are from five to 10 days from the day of submitting the invoices. All suppliers issued invoices during or immediately after the election campaign, so their debts had to be settled by the end of September at the latest. Instead, a Protocol on the payment of certain debts was concluded after the expiration of the agreed payment deadline.

The agreement between the coalition "For the Future of Montenegro" and **Pink Media M** states that the coalition is obliged to pay the amount from the issued invoice within **seven days** at the latest. The invoice was issued on September 3, 2020, thus, according to the contract, it was supposed to be paid by 11 September 2020, long before the agreement was signed.

[63] Law on Financing of Political Entities and Election Campaigns, Article 17, paragraph 6: "If, after settling all liabilities, some unspent funds remain in the separate account for financing of the election campaign, the political entity shall transfer the funds to its regular account by the time the separate account is closed."

[64] Ibid, Article 24 paragraph 3: "All funds intended for the financing of election campaign shall be paid into the account referred to in paragraph 1 of this Article and all payments of election campaign costs shall be carried out by the political entity via that account, until the separate account is closed".

[65] Ibid, Article 25, paragraph 1: "Political entity shall close the separate bank account referred to in article 24 of this Law within 90 days from the day final election results are announced, and shall inform the Agency thereof within three days from the day it closed the separate bank account and provide proof of its closure."

[66] Ibid, Article 66 paragraph 1 item 24: "it fails to pay all the funds intended for the financing of election campaign into the account referred to in Article 24 paragraph 1 of this Law and fails to pay for all the costs of the campaign via that account, until the separate account is closed".

3.4.

NOVA SRPSKA DEMOKRATIJA

3.9.3
19.08.2020

"PINK MEDIA M" D.O.O.

Broj: 12/20
Podgorica, 12.08.2020.god.

NOVA SRPSKA DEMOKRATIJA

Broj: 633

Podgorica, 03.09.2020.god.

Ugovor o pružanju marketinških usluga

Zaključen u Podgorici dana 11.08.2020.godine između:

- Pink Media M d.o.o.**, sa sjedištem u Podgorici, Ul. slobode broj 78, **PIB 03214389**, koga zastupa ovlašćeni zastupnik Goran Radenović, u daljem tekstu- davalac usluga.

- KOALICIJA ZA BUDUĆNOST CRNE GORE**, sa sjedištem u Podgorici Hercegovačka 18, **PIB 27464776**, koju zastupa ovlašćeno lice Milutin Đukanović, u daljem tekstu- korisnik usluga.

Član 1.

Predmet ovog Ugovora je pružanje marketinških usluga za političku partiju KOALICIJA ZA BUDUĆNOST CRNE GORE od strane Pink Media M d.o.o. na tv kanalu Pink M.

Član 2.

Davalac usluga se obavezuje da za vrijeme političke kampanje vezane za parlamentarne izbore za poslanike u Skupštini Crne Gore, kao i za izbore odbornike u Skupštini Opštine Andrijevića, Budva, Gusinje, Kotor i Tivat koji će biti održani 30.08.2020. godine, pruža marketinške usluge prema dogovorenom media planu, koji je prilog ovog Ugovora.

Član 3.

Davalac usluge je dužan da drugoj ugovornoj strani u toku predizborne kampanje za period od 11.08.2020. godine do završetka kampanje 28.08.2020.godine, obezbijedi traženi marketinški prostor shodno dostavljenoj ponudi i prema važećem cjenovniku.

Član 4.

Ugovorne strane su saglasne da će davalac usluge ispostaviti jedinstvenu fakturu za cjelokupno oglašavanje izborne kampanje naručeno od strane korisnika usluge.

Za dodatno oglašavanje i posebne oblike oglašavanja regulisaće se Anexom ovog ugovora.

Član 5.

Korisnik usluge je dužan da iznos iz ispostavljene fakture izmiri u roku od najkasnije 7 dana, od dana dostavljanja fakture. Plaćanje fakture se mora izvršiti prenosom sredstava sa posebnog

Klijent: Koalicija za buducnost Crne Gore

Adresa: Hercegovačka 18

Grad: Podgorica

PIB: 27464776

PDV:

Preduzeće za informisanje i marketing
"Pink Media M" d.o.o.
Ul.slobode 78, 81000 Podgorica
PIB: 03214389
PDV: 30321-19408-2
Žiro račun za uplatu:
IB 520-39236-28
NLB 530-27574-32

RACUN BR. 07.08/20

VRSTA USLUGE	UKUPNO
Prema dogovorenom I dostavljenom media planu za period 11.08-28.08.2020.godine.	490,354.00 €
Opcija...3...dana	
Ukupno:	490,354.00 €
Popust: 50%	245,177.00 €
EUR: 21%	245,177.00 €
Porez: 21%	51,487.17 €
Za naplatu:	296,664.17 €

Reklamacije u roku od 3 dana
Za prekoračenje plaćanja zaračunavamo kamatu
U slučaju spora, nadležni je Pilevski sud u Podgorici

U Podgorici,

31.08.2020.godine

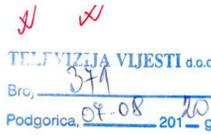
Izvršni direktor
Goran Radenović
"PINK MEDIA M"
PODGORICA

Photo 7: Excerpt from the contract between Pink Media M and the coalition "For the Future of Montenegro"

Photo 8: Invoice of the Pink Media M submitted to the coalition "For the Future of Montenegro" on September 3, 2020.

According to the agreement with **Vijesti Television**, on behalf of the coalition, NOVA was obliged to make the payment within **five days** from the day of issuing the invoice. TV Vijesti submitted an invoice to them on August 31, 2020.

3.4.



FAKTURA br. 396/2020

Kupac: 263 "Nova Srpska Demokratija"

Sjedište: Podgorica
Adresa: Vojislava Gnujića 4
PIB: 02746476
PDV:

Datum fakture: 31.08.2020
Način plaćanja: VIRMANSKI
Datum valute: 07.09.2020
Veza profakture:
Veza ugovora:

- „Televizija Vijesti” Podgorica, Trg nezavisnosti bb, (PIB 02678918, PDV 30/31-06723-4), kojeg zastupa izvršni direktor Marijana Bojanić, (u dajem tekstu: **Televizija Vijesti**)
- „За будућност Црне Горе”, Podgorica, Hercegovачка 18 (Nova srpska demokratija PIB 2746476), kojeg zastupa **Milutin Đukanović**

Član 1

Ovim Ugovom se regulišu međusobna prava i obaveze u vezi saradnje **Klijenta i Televizije Vijesti**, tj. realizacije političkog marketinga i emitovanja dostavljenog materijala Klijenta na programu Televizije Vijesti Vijesti. Materijal shodno ovom Ugovoru, se sastoji od dostavljenog političko reklamno-propagandnog materijala u formi reklame, predviđenog za televizijsko emitovanje u trajanju i na pozicijama prema odgovarajućim rezervacijama koje će Klijent blagovremeno dostavljati ovlaštenim licima službe marketinga.

Član 2

Televizija Vijesti se obavezuje da će u toku Predizborne kampanje povodom Pralamentarnih i Lokalnih izbora u avgustu 2020 godine, omogućiti Klijentu emitovanje dostavljenog materijala prema rasporedu i terminima koji su Cjenovnikom predviđene za objavljivanje političkog marketinga i koji su pojedinačno određeni i obostrano prihvaćenim medija planom.

Član 3

Televizija Vijesti je dužan da Klijentu ispostavi fakturu za objavljivanje dostavljenog materija odmah nakon realizacije medija plana i u skladu sa Cjenovnikom za plaćene izborne oglase. Klijent se obavezuje da izvrši plaćanje po ispostavljenoj fakturi u roku od 5 dana od dana ispostavljanja fakture.

RRR	OPIS	KOL.	CIJENA	RABA T %	IZNOS %	POREZ %	IZNOS %	Cj. sa PDV i rabatom	IZNOS
1	Emitovanje reklamnih spotova prema priloženom medija planu	1	503.671,00	45	***** 21	58,174,00	335.193,05		335.193,05

PO CIJENOVNIKU : **503,671.00**
ODGOBINTI RABAT : **226,651.95**
UKUPNO (BEZ PDV-a) : **277,019.05**
ORACUNATI PDV : **58,174.00**
UKUPNO (4) : **335,193.05**

По закону о PDV-у (Sl. list 65/01, 38/02, 72/02, 21/03, 76/05, 29/13) porez zaračunat po stopi 21%

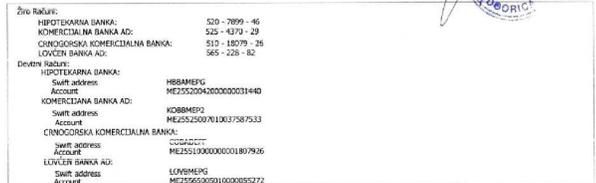


Photo 9: Excerpt from the contract between Television Vijesti and the coalition "For the Future of Montenegro"

Photo 10: Invoice of the Television Vijesti submitted to the coalition "For the Future of Montenegro" on August 31, 2020

The contract with the **Daily Press** (newspaper and portal Vijesti) states that it is mandatory to make the payment **five days** from the invoice delivery. The company issued two invoices on August 31.

The contract concluded with **Limanaki Studios LTD** states that their costs will be paid no later than **ten days** from the date of delivery of the invoice. That invoice was issued on September 19, 2020.

3.4.

НОВА СРПСКА ДЕМОКРАТИЈА
 Број 335
 Подгорица, 05.08 2020 год.

UGOVOR

Između: Limanaki Studios LTD

Korporacija registrovana u drzavi Kipar broj korporacije HE 373244 sa sjedištem u 11 Kyriakou Matsi, Office 303, Nikozija 1082 Kipar

Predstavnik MEGASERVE NOMINEE SERVICES LTD, koju zastupa Antonis Polyviou

(U daljem tekstu: producent) jedna od strana

Koalicija "Za budućnost Crne Gore"

(U daljem tekstu: Korisnik) druga strana

Budući da je: Producent je kompanija sa iskustvom u izradi reklamnih spotova za izborne i društveno medijske kampanje

1. budući da je: Korisnik želi da angažuje usluge producenta za namjenu izrade spotova izborne kampanje u Crnoj Gori
 (U daljem tekstu Zadatak)

i budući da je: Obije strane žele da formulisu i razgraniče njihove zajedničke odgovornosti u skladu sa uslovima koje su navedeni u daljem tekstu.

Dakle ovo je svjedočenje i deklarisanje i dogovor između oBiju strana na sledeći način:

1. Uvod ovog Ugovora mora imati formu nerazvojenih strana
2. Producent ovim preuzima odgovornost da obezbedi Korisniku usluge koje se tiču zadatka, uključujući produkciju spotova izborne kampanje. (U daljem tekstu Usluge.)
3. Korisnik prihvata da plati usluge Konsultanta shodno sledećoj dinamici: Iznos od 50.000EUR da bude plaćen, ne više od deset radnih dana od kada producent podnese fakturu na ime troškova produkcije.

Photo 11: Excerpt from the contract between Limanaki Studios LTD and the coalition "For the Future of Montenegro"

НОВА СРПСКА ДЕМОКРАТИЈА
 Број 684
 Подгорица, 19.09 2020 год.

LIMANAKI STUDIOS LTD

TO: NSD - ZA BUDUCNOST CRNE GORE HERCEGOVACKA 18, PODGORICA MONTENEGRO VAT No: 02746476	DATE: 31.08.2020.
INVOICE No: 002 /2020	
Video production for purpose of election campaign strategy in Montenegro for the coalition "Za budućnost Crne Gore"	50.000,00
FUNDS TO REMIT TO: BENEFICIARY: LIMANAKI STUDIOS LTD BANK: BANK OF CYPRUS PLC 0173 BRANCH, NICOSIA CYPRUS VAT No: 10373244K SWIFT: BCYPCY2N EUR IBAN: CY96002001950000357026153196	
NOTE: INTRA COMMUNITY TRANSACTION THIS INVOICE IS PAYABLE AT PRESENTATION	EUR 50.000,00



FOR LIMANAKI STUDIOS LTD

11, KYRIAKOU MATSI, NIKIS CENTER, OFFICE 303,1082 NICOSIA, CYPRUS
 PHONE /+357 22 767 770, FAX /+357 22 767 740

Photo 12: Invoice of Limanaki Studios LTD submitted to the coalition "For the Future of Montenegro" on September 19, 2020

The contract with the **Đoković** company states that the payment is to be made **no later than September 30, 2020**. That company issued an invoice on August 17 stating exactly that deadline for payment.

3.4.

НОВА СРПСКА ДЕМОКРАТИЈА

Број 476
Подгорика, 24. 08 2020 год.

ĐOKOVIĆ d.o.o.

PIB: 02106086 Danilovgrad, ul. K. Đurovića 3/31
Tel: +382 69 019 428; fax: +382 20 812 428; e-mail: djokovici@t-com.me

RAČUN: 35/20

Ž.r 510-2740-65

Ž.r. 550-11386-69

DATUM: 17.08.2020

Izborna lista „ZA BUDUCNOST CRNE GORE“

(NOVA SRPSKA DEMOKRATIJA, pib.02746476)

1. Ugovorene obaveze (04/20) „PARLAMENTARNI IZBORI 2020“	83.120,00
+PDV 21%	17.455,20
UKUPNO:	100.575,20

NAPOMENA:

- Rok plaćanja 30.09.2020

Račun izdao:



Račun primio:



Photo 13: Invoice of Đoković LLC submitted to the coalition "For the Future of Montenegro" with a payment deadline of 30.09.2020

The contract with **A Media Team** does not specify a deadline for payment of the issued invoice.

The contract with the **Society for Equality and Tolerance** states that the deadline for payment is **10 days** after the end of providing of services. The same contract stipulates that services would be provided until August 28, 2020.

In the price lists for advertising in the election campaign, the listed suppliers did not state the possibility of deferred payment.

The bills that the coalition "For the Future of Montenegro" paid in arrears, their political opponents whose finances are available to the public paid on time. [67]

[67] For example Democrats, SDP, URA. More detailed information is given in the chapters related to these political parties.

3.4.

What expenses are not recorded in the protocol?

Over 40 thousand euros of debts to suppliers are not included in the protocol, and they have not been settled from the election account or the account for financing the regular operation of NOVA, which, prior to signing the protocol was signed, was obliged to pay all election campaign expenses.

The debt to Montenegro Post of over 20 thousand euros was not the subject of signing the protocol, and it was not paid from any of the available NOVA accounts until the end of 2021.

The same is the case with the debt of **over 15 thousand euros of reported advertising costs on Google, which were also not paid from NOVA's account.** Total official expense of advertising on this social network was around 37 thousand euros, and less than 22 thousand euros was paid from the election account. However, the settlement of these expenses was not the subject of the protocol. It is not possible to determine whether some of the NOVA's payments to Google from the account for financing the regular operation relate to covering these expenses or to additional advertising on that social network.

NOVA owed **A Media Team, i.e. Atlas Television**, 19,238 euros, but the protocol stipulates that the debts of a total of 10,585 euros would be covered, i.e. around **8.6 thousand** less.

Were the expenses ever paid?

According to the mentioned protocol, NOVA was obliged to pay over **80 thousand euros to the company Pink Media M, 50 thousand to the Cypriot company Limanaki studio and over 15 thousand to the Society for Equality and Tolerance.**

NOVA did not pay those expenses in 2020, as well as until the end of August 2022, from any account of that party that is publicly available. [68]

Of all the members of the coalition, in addition to NOVA, SNP and partly DNP published their finances. While SNP paid its debts according to the protocol by the end of May 2022, DNP had not settled its debt to Pink. More detailed information on the payment of part of the debts that they took over under the protocol is given in separate chapters. [69] It is not known whether the Movement for Changes (PzP) and United Montenegro paid their share of liabilities for the election campaign expenses, because those parties did not publish data on their finances, and in official reports, they stated that they did not have those expenses in 2020. The Workers' Party and True Montenegro also hid more detailed information, but stated in official reports that they had election campaign expenses, i.e. that they paid amounts that correspond to the liabilities under the Protocol. [70]

Unreported election campaign expenses

Around 12,000 euros of expenses paid from the bank account opened to finance the election campaign were not stated in the official report.

Nearly seven thousand euros in fees, which were not reported in the report on the expenses of the election campaign, was paid from the account for financing the election campaign.

Not a single donation of a natural person of around two thousand euros and around 400 euros of bank commissions was reported. A loan instalment of around 2.6 thousand euros was also paid from that account.

[68] During 2021 and 2022, MANS continued to gather data on regular operation of the parliamentary political parties, which will be the subject of analysis in the next publication. In the context of this analysis, we used that data to determine whether the parties paid all the expenses of the election campaign.

[69] More details in chapters D.6. Socialist People's Party (SNP) and D.10. Democratic People's Party (DNP).

[70] More detailed information is given in the part of the publication related to those parties.

D.4.

Social Democrats of Montenegro (SD)

In two years, Social Democrats of Montenegro had revenues of 1.5 million euros, and received over 1.1 million euros from the state and municipalities.

The party is extremely non-transparent and has not published a single information about its finances other than the legally prescribed minimum.

The average transparency score of SD's financial operations is 0.

The party's very brief financial reports show that some groups of expenses increased in the election year compared to the previous one, in particular:



payment of salaries and other benefits doubled,



two and a half times higher representation expenses,



fuel expenses doubled,



five times higher expenses of non-productive services.

It is not possible to determine whether SD paid all campaign expenses for the parliamentary elections.

4.1.

TRANSPARENCY OF FINANCIAL OPERATIONS

MANS submitted 55 requests for information to SD and asked for data on their finances in 2019 and 2020, but that party did not respond to any of our requests.

We have filed appeals in all 55 cases, and decisions were adopted in 41 cases and each of them is instructing the SD to act upon our request. That party, however, still has not responded to our requests.

Only the mandatory consolidated financial statements for 2019 and 2020 are available to the public, as well as the audit report for 2020.

Total transparency score of the party financing

0.00

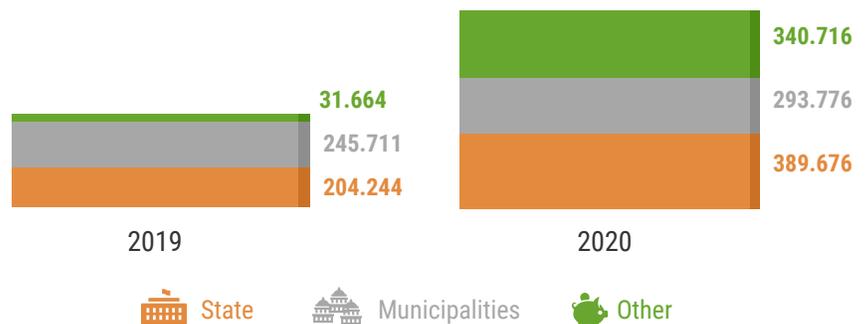
4.2.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

According to the data from financial reports, SD doubled its revenues in 2020, which amounted to **over one million euros**, while in 2019, they were **around 480 thousand**.

Official sources of financing in 2019 and 2020



4.2.

Revenue sources

In the last two years, SD received three quarters of its official revenues from public sources, i.e. state and municipal budgets. In the election year, however, funds from other sources, especially loans, increased significantly.

In 2020, the party took two loans worth a total of 300,000 euros, which were paid into a regular account, while the SAI claims that their purpose is to maintain liquidity. [71] In the report on the financing of the election campaign, SD states that they obtained 250 thousand euros from the loan, although it was paid into the account for regular operation and did not officially refer to the financing of the election campaign. Therefore, the SAI stated in its report that "there is a discrepancy between the data stated in the business records and the Report submitted to the Agency". [72]

SD collected 8.5 thousand euros in contributions from natural persons in the election year, and around 1.4 thousand in the previous year. In the election year, the funds collected on the basis of membership fees were reduced to 26 thousand from 30 thousand euros in 2019.

4.3.

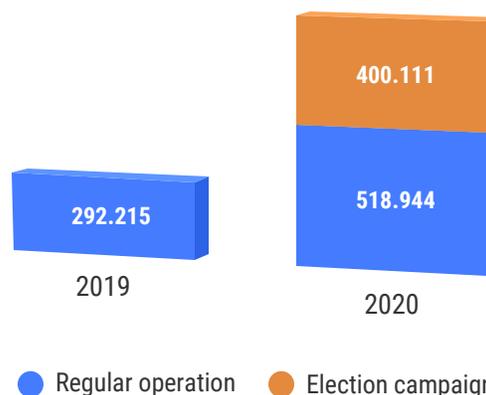
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

The expenses of regular operation of SD in 2019 amounted to **less than 300 thousand euros**, and **nearly 520 thousand euros** in 2020. [73]

The reported expenses of the election campaign were around 400 thousand euros.

Official expenses of the regular operation and election campaigns (2019 and 2020)



[71] Audit Report of Consolidated Annual Financial Statement of Social Democrats of Montenegro for 2020, page 5.

[72] Ibid.

[73] These data do not include depreciation expenses reported in the financial statements.

4.3.

Which expenses of regular operation increased in the election year?

In the election year, the expenses of rent, representation, fuel and salaries increased, as well as other expenses that are not precisely stated in the financial statements.

The expenses incurred for leasing property are 37% i.e. nearly 20 thousand euros higher in the election year than in the previous year. Payments to natural persons from whom the premises were rented also increased, as new people appear on the list of payments in 2020. [74] Payments of lease costs to legal entities also increased, thus the expenses paid to the Municipality of Danilovgrad are ten times higher than in the previous year, and the expenses of renting premises from the company Avanti 3 from Bar, which provides hospitality services, are also recorded.

Obrazac TNPUZI				
Troškovi nastali prilikom uzimanja u zakup imovine				
Nepokretnost	Mjesto i adresa	Površina (m2)	Datum uzimanja u zakup	Trošak zakupa imovine (u €)
Adžović Ibrahim				2.400,00
Agović Zika				1.800,00
Bakić Radomir				960,00
Hot Jusuf				3.000,00
Janković Žanka				4.800,00
Jovičić Tamara				8.400,00
Krstović Ranko				2.400,00
Markišić Amel				3.600,00
Medenica Srećko				2.700,00
Mulalić Hatidža				2.400,00
Smaković Nedžad				4.320,00
Tajić Dragan				3.000,00
Čorić Jadranka				1.800,00
Čupić Branko				2.040,00
Neto				43.640
Porez na dohodak I TROŠKOVI ZAKUPNINA FIZIČKA LICA				2.933
Montex A.D.				2.741,86
Opština Danilovgrad				100,00
TP PKB u stečaju Zelenika				3.049,30
Udruženje penzionera Danilovgrad II TROŠKOVI ZAKUPA - PRAVNA LICA				1.400,00
Neto				7.291
Ukupno:				53.844

Obrazac TNPUZI				
Troškovi nastali prilikom uzimanja u zakup imovine				
Nepokretnost	Mjesto i adresa	Površina (m2)	Datum uzimanja u zakup	Trošak zakupa imovine (u €)
Adžović Ibrahim				2.400,00
Agović Zika				1.800,00
Bakić Radomir				960,00
Hot Jusuf				3.000,00
Janković Žanka				4.800,00
Jovičić Tamara				8.400,00
Krstović Ranko				2.400,00
Marinić Lidija				4.050,00
Markišić Amel				3.600,00
Medenica Srećko				3.050,00
Mulalić Hatidža				2.400,00
Prodanović Duško				7.000,00
Radončić Džafer				2.500,00
Smaković Nedžad				1.080,00
Tajić Dragan				3.000,00
Čorić Jadranka				1.800,00
Čupić Branko				2.040,00
Neto				54.280,00
Porez na dohodak I TROŠKOVI ZAKUPNINA FIZIČKA LICA				3.649,73
JU Kulturni centar Nikola Đurković Kotor				200,00
Akademija znanja DOO				121,00
HTP Budvanska rivijera				20,00
Institut Dr Simo Milošević				160,00
JU Centar za djelatnosti kulture-B. Polj				750,00
Montex AD				2.991,12
Opština Danilovgrad				1.060,00
PKB Herceg Novi AD				1.270,50
Prehrana AD				80,00
TP PKB H Novi AD Zelenika				1.524,60
Wahels DOO				800,00
DOO Avanti 3 Bar II TROŠKOVI ZAKUPA - PRAVNA LICA				6.776,00
Neto				15.753,22
Ukupno:				73.683

Photo 14: Excerpt from the financial statements of SD for 2019 and 2020, expenses incurred for leasing property

[74] For example, in 2020, Prodanović Duško was paid 7,000 euros, Marinić Lidija 4,050, and Radončić Džafer 2,500, while in the previous year, these persons were not on the list.

4.3.

While there was no **lease of movable property** in 2019, in the election year 2020, SD rented a vehicle and paid over five thousand euros for that service.

Troškovi nastali prilikom uzimanja u zakup pokretne imovine			Troškovi nastali prilikom uzimanja u zakup pokretne imovine		
Vrsta pokretne imovine	Period uzimanja u zakup	Trošak zakupa pokretne imovine (u €)	Vrsta pokretne imovine	Period uzimanja u zakup	Trošak zakupa pokretne imovine (u €)
			Vozilo	Iznajmljivanje	5.314
Ukupno:			Ukupno:		5.314

Photo 15: Excerpt from the financial statements of SD for 2019 and 2020, expenses incurred for movable property

Expenses incurred for the **use of movable property** are nearly **90 thousand euros** higher in the election than in the previous year, i.e. they increased by **66%**.

Within this group of expenses, there was a large increase in expenses for **representation**, from 23 thousand to nearly 60 thousand euros.

Fuel expenses are higher by nearly 20 thousand euros, which is an increase of 140% compared to the previous year.

The costs of **non-productive services**, which are not defined in more detail, are five times higher in the election year than in the previous year, the services of the carrier are twice as expensive, and the advertising expenses also increased.

Troškovi nastali pri korišćenju pokretne imovine				Troškovi nastali pri korišćenju pokretne imovine			
Vrsta pokretne imovine (u €)	Troškovi redovnog održavanja	Ostali troškovi (u €)	Ukupno (u €)	Vrsta pokretne imovine (u €)	Troškovi redovnog održavanja	Ostali troškovi (u €)	Ukupno (u €)
Troškovi energije			6.243	Troškovi energije			6.427
Troškovi goriva			14.146	Troškovi goriva			34.023
Troškovi vode			1.357	Troškovi vode			730
PTT usluge-fiksa telefonija			12.532	PTT usluge-fiksa telefonija			11.844
Troškovi mobilna mreža			20.550	Troškovi mobilna mreža			18.870
Troškovi internet			181	Troškovi internet			555
Troškovi prevoznika			1.066	Troškovi usluga prevoznika			2.034
Troškovi usluga održavanja osnovnih sredstava			5.393	Troškovi usluga održavanja osnovnih sredstava			6.324
Troškovi neproizvodnih usluga			4.810	Troškovi neproizvodnih usluga			24.031
Troškovi reklame i propagande			4.314	Troškovi reklame			6.775
Troškovi sponzorstva			677	Troškovi ostalih usluga			42
Troškovi komunalnih usluga			2.378	Troškovi komunalnih usluga			2.202
Ostali poslovni rashodi			2.457	Ostali poslovni rashodi			4.823
Troškovi amortizacije osnovnih sredstava			16.771	Troškovi amortizacije osnovnih sredstava			19.716
Troškovi ostalih neproizvodnih usluga			5.111	Troškovi ostalih neproizvodnih usluga			7.800
Troškovi stručne literature i časopisa			4.968	Troškovi štampe i časopisa			753
Troškovi reprezentacije			23.352	Troškovi reprezentacije			59.184
Troškovi platnog prometa bankinih usluga			773	Troškovi platnog prometa			1.045
Troškovi takse, drugi administrativni troškovi			290	Troškovi usluge, održavanja zakupljenog prostora			5.315
Troškovi drugi, nematerijalni troškovi			1.359	Nematerijalni troškovi			1.175
Troškovi prireza na porez			431	Troškovi prireza			537
Rashodi kamata			1.816	Rashodi iz ranijih godina			894
Troškovi iz ranijih godina			2.100	Troškovi kamata na kredit			8.225
Ukupno:			135.080	Ukupno:			224.099

Photo 16: Excerpt from the financial statements of SD for 2019 and 2020, expenses incurred for using movable property

4.3.

The expenses of office and other supplies are 30% higher in the election year than in the previous one.

Obrazac „TNOK					Obrazac „TNOK				
Troškovi nastali po osnovu kupovine kancelarijskog i drugog materijala za redovan rad					Troškovi nastali po osnovu kupovine kancelarijskog i drugog materijala za redovan rad				
Predmet (opis)	Naziv i sjedište dobavljača	Datum nastanka troška (datum prijema predmeta)	Datum plaćanja	Iznos (u €)	Predmet (opis)	Naziv i sjedište dobavljača	Datum nastanka troška (datum prijema predmeta)	Datum plaćanja	Iznos (u €)
1. Troškovi kancelarijskog materijala				2.518	1. Troškovi kancelarijskog materijala				4.892
2. Troškovi reklamnog materijala				32.351	2. Troškovi reklamnog materijala				33.294
3. Troškovi ostalog materijala				649	3. Potrošni materijal				7.707
					4. Sitan inventar				374
Ukupno:				35.518	Ukupno:				46.267

Photo 17: Excerpt from the financial statements of SD for 2019 and 2020, expenses incurred for the purchase of office and other supplies for regular operation

The expenses of salaries and other allowances increased by over 111 thousand euros in the election year compared to the previous year. Since only few data are given in the financial report, it is impossible to determine which part of these expenses refers to the salaries of employees in the party, and which refers to allowances.

Obrazac TNOZ					Obrazac TNOZ				
Troškovi nastali po osnovu isplate zarada i ostalih naknada					Troškovi nastali po osnovu isplate zarada i ostalih naknada				
Obaveze po osnovu zarada	Obaveze po osnovu autorskih honorara	Obaveze po osnovu ugovora o djelu	Ostale naknade	Ukupno (u €)	Obaveze po osnovu zarada	Obaveze po osnovu autorskih honorara	Obaveze po osnovu ugovora o djelu	Ostale naknade	Ukupno (u €)
78.827	-	4.558	4.180	87.575	193.852	-	4.838	502	199.192
Ukupno:				87.575	Ukupno:				199.192

Photo 18: Excerpt from the financial statements of SD for 2019 and 2020, expenses incurred on the basis of payment of salaries and other allowances

It was not possible to determine whether SD paid all the reported expenses of the election campaign, because that party did not provide us with data.

D.5.

Social Democratic Party of Montenegro (SDP)

In two years, Social Democratic Party of Montenegro earned nearly 1.1 million euros, of which around 900 thousand from public sources.

That party is among transparent ones, with an average score of 4.27.

During the election campaign, SDP paid three times the expenses of advertising on social media from the account for financing the regular operation compared to the same period of the previous year.

Although in 2020 the total amount of paid salaries somewhat increased, from April to September of that year, SDP paid much less for taxes and contributions than in the previous year.

By the end of 2020, all reported campaign expenses for the parliamentary elections had been paid from the SDP's separate account.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from SDP on inflows and outflows from 16 accounts during 2019 and 2020, as follows: two bank accounts of the head office, two business cards for regular financing, one foreign currency account, one account of the Women's Forum, five election accounts - for parliamentary elections, local elections in Tivat, Budva, Kotor and Gusinje, five business cards - election financing (parliamentary elections and local elections: Budva, Tivat, Kotor and Gusinje). In addition, we were provided with data on spending from the treasuries - of the head office and the Women's Forum, as well as five election treasuries - for parliamentary and local elections in Budva, Tivat, Kotor and Gusinje.

Transparency scores of financial operations

Total transparency score [75] of financing of SDP is 4.27. Transparency score of the regular operation financing of that party is 4.02, while the transparency score of the election campaigns financing is 4.95.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	4.00	4.00	5.00	4.00
Head office	all statements submitted	all statements submitted	all statements submitted	100% of transactions submitted in relation to SAI data
	complete data available for 50% of transactions	complete data available for 61% of transactions	complete data available for 100% of transactions	complete data available for 50% of transactions, cash withdrawal from the account coincides with 98% of the treasury inflows
	5.00	-	-	4.00
Women's Forum	all statements submitted	no	no	100% of transactions submitted in relation to SAI data
	complete data available for 100% of transactions	-	-	complete data available for 50% of transactions, withdrawing cash from the account coincides with treasury inflows
	-	-	-	-
Municipal boards	no	no	no	no
	-	-	-	-
Transparency score of the regular operation financing				4.02

[75] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

5.1.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	5.00	-	5.00	4.00
	all statements submitted	no	all statements submitted	100% of transactions submitted in relation to SAI data
	complete data available for 100% of transactions	-	complete data available for 100% of transactions	complete data available for 50% of transactions, cash withdrawals from the account coincide with treasury inflows
Kotor	5.00	-	5.00	4.00
	all statements submitted	no	all statements submitted	100% of transactions submitted in relation to SAI data
	complete data available for 100% of transactions	-	complete data available for 100% of transactions	complete data available for 50% of transactions, cash withdrawals from the account coincide with treasury inflows
Budva	5.00	-	5.00	4.00
	all statements submitted	no	all statements submitted	100% of transactions submitted in relation to SAI data
	complete data available for 100% of transactions	-	complete data available for 99% of transactions	complete data available for 50% of transactions, cash withdrawal from the account coincides with treasury inflows
Tivat	5.00	-	2.00	4.00
	all statements submitted	no	18% of the inflows from the election account submitted	100% of transactions submitted in relation to SAI data
	complete data available for 100% of transactions	-	complete data available for 59% of transactions	complete data available for 50% of transactions, cash withdrawal from the account coincides with cash inflows
Tuzi	<i>did not participate</i>	-	-	-
Andrijevica	<i>did not participate</i>	-	-	-
Gusinje	5.00	-	5.00	5.00
	100% of the account statement was submitted	no	all statements submitted	100% of transactions submitted in relation to SAI data
	complete data available for 98% of transactions	-	complete data available for 91% of transactions	complete data available for 100% of transactions, cash withdrawal from the account coincides with cash inflows
Transparency score of the election campaign financing				4.95

Total transparency score of party financing

4.27

5.1.

What is missing?

According to SDP's data, financial operations are conducted through the head office, while the party's municipal boards have no separate accounts or treasuries.

The biggest shortcomings relate to spending of the cash from several treasuries, regarding which we were provided with insufficiently precise records to be able to determine in what way these funds were spent.

5.2.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues published by the SDP in 2019 were **around 380 thousand euros**. In 2020, the revenues on the published accounts for regular financing were **over 600 thousand**, and nearly 120 thousand euros was paid for the election campaign.

Available revenues for financing the regular operation and election campaigns (2019 and 2020)



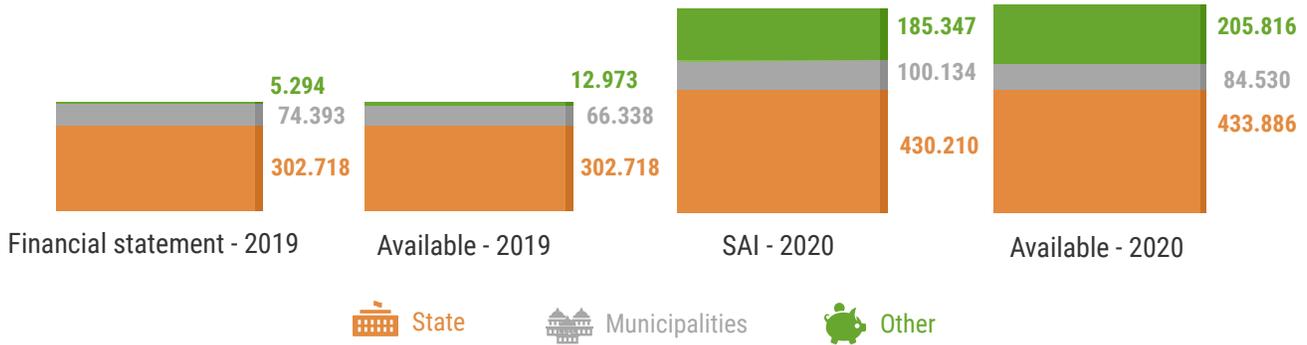
Comparison with auditor's data and financial statements

Available data on SDP's revenues differ from the SAI reports and financial statements of that party, primarily due to the loan taken during 2020.

Less data on municipal budget revenues is publicly available than stated in the SAI report and the SDP's financial statement, which is probably a matter of calculated but uncollected revenues. In addition, the party made a compulsory debt settlement of around 18,000 euros, but it is not known from whom, so this could partly explain the difference in publicly available data in the SAI's reports and the party's consolidated financial statements.

5.2.

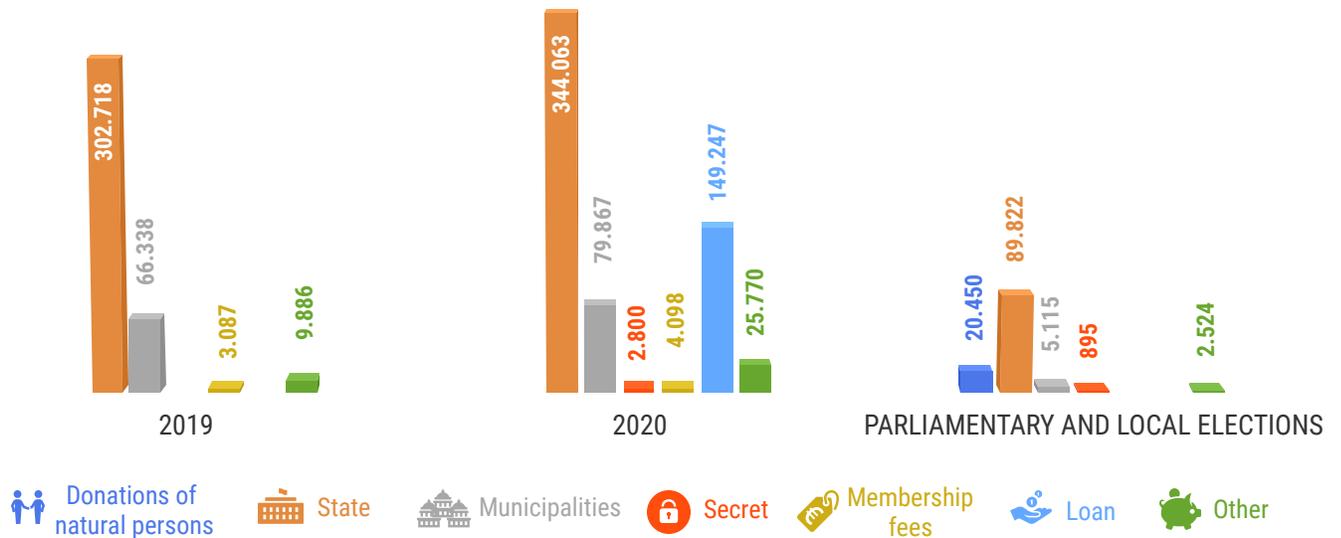
Comparison of SAI data and data from financial statements on total revenues with available information from all available accounts in 2019 and 2020



Revenue sources

Most of the SDP's official revenues come from the state and municipalities, a smaller part from membership fees, while donations were paid exclusively to finance the election campaign.

Revenue sources in 2019 and 2020



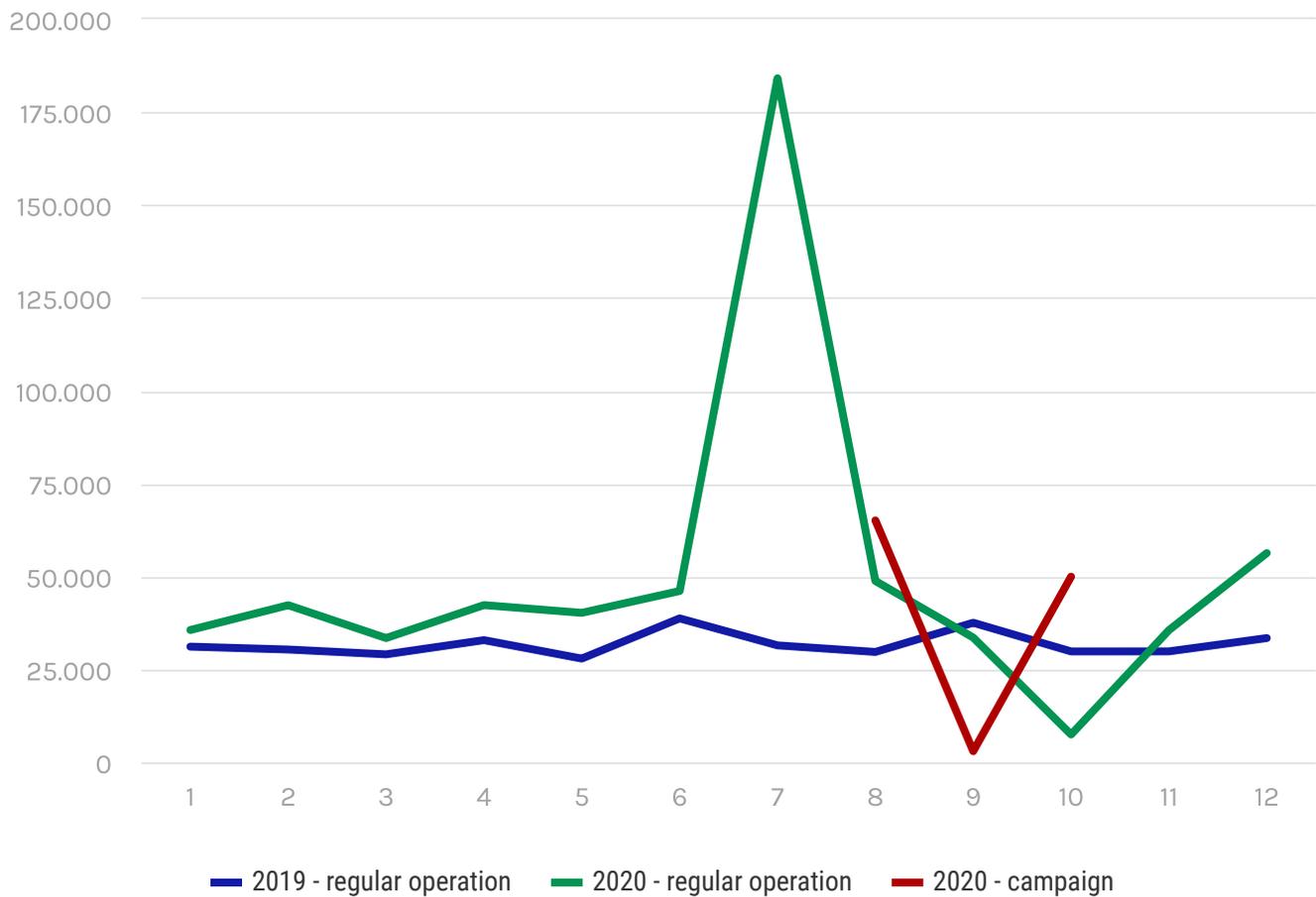
On July 23, 2020, SDP took a loan of 150 thousand euros, which was paid into the account for regular operation. Four days after taking the loan, SDP transferred 100,000 euros to the account to finance the parliamentary election campaign. On August 28, SDP transferred additional 50,000 to the election account.

5.2.

Average monthly revenues and payment dynamics

In 2019, average monthly revenues for the regular operation of SDP were around 30 thousand euros, and in the following year, they increased to around 40 thousand, not including the funds provided from the already mentioned loan.

All available revenues by months (2019 and 2020)



5.3.

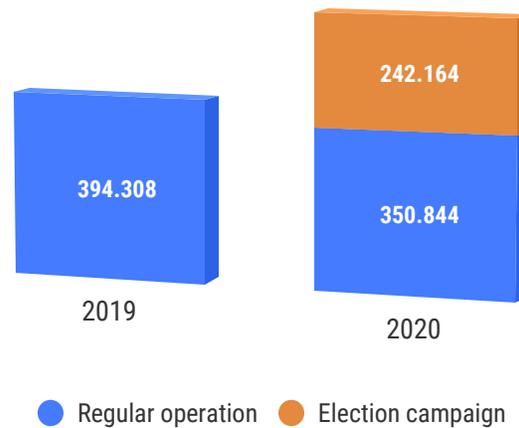
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

The expenses of the regular operation of SDP in 2019 amounted to **nearly 400 thousand euros**, and **around 350 thousand** in 2020.

The reported expenses of the parliamentary and local elections were around 240,000 euros.

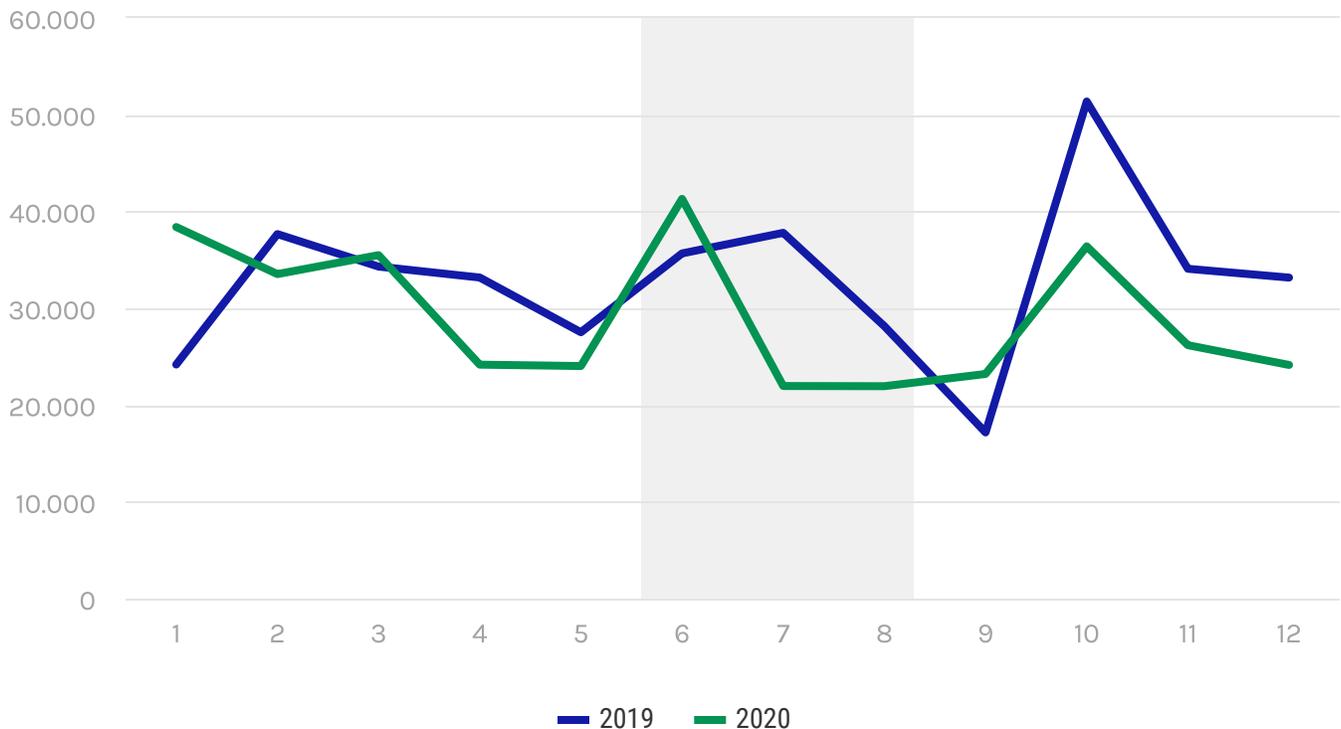
Available expenses of the regular operation and election campaigns (2019 and 2020)



Monthly expenses

In June and September 2020, SDP had increased expenses of financing the regular operation compared to the same period of the previous year.

Expenses of financing the regular operation, by months (2019 and 2020)

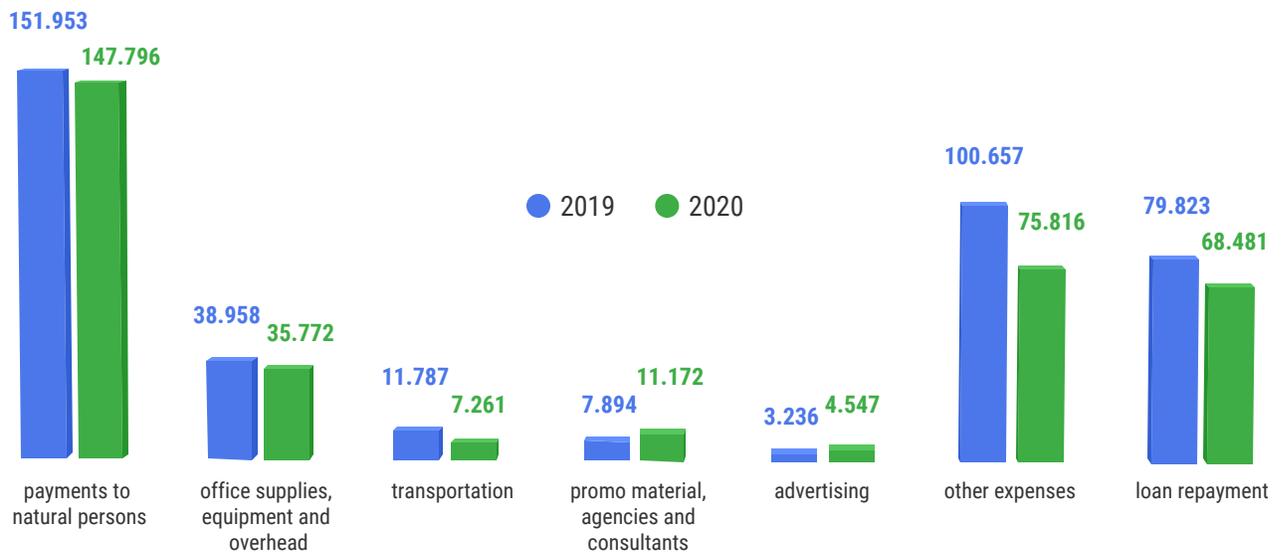


5.3.

Which expenses of regular operation increased in the election year and during the election campaign?

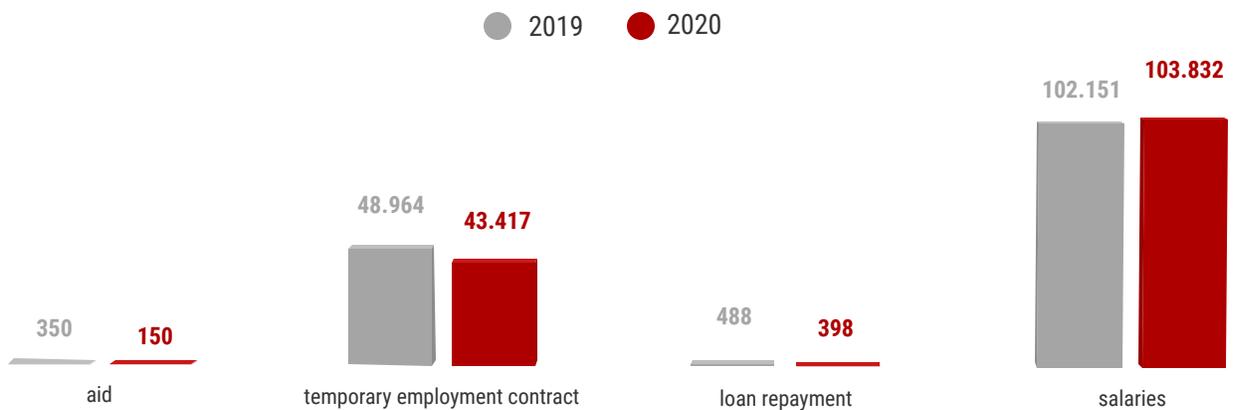
All expenses of the regular operation are lower in the election year, except for a small increase for expenses of promotional materials and hiring of agencies, as well as advertising.

Expenses of regular operation, by categories (2019 and 2020)



Payments to natural persons. In the election year, only payments based on the salaries of party employees increased, and only slightly.

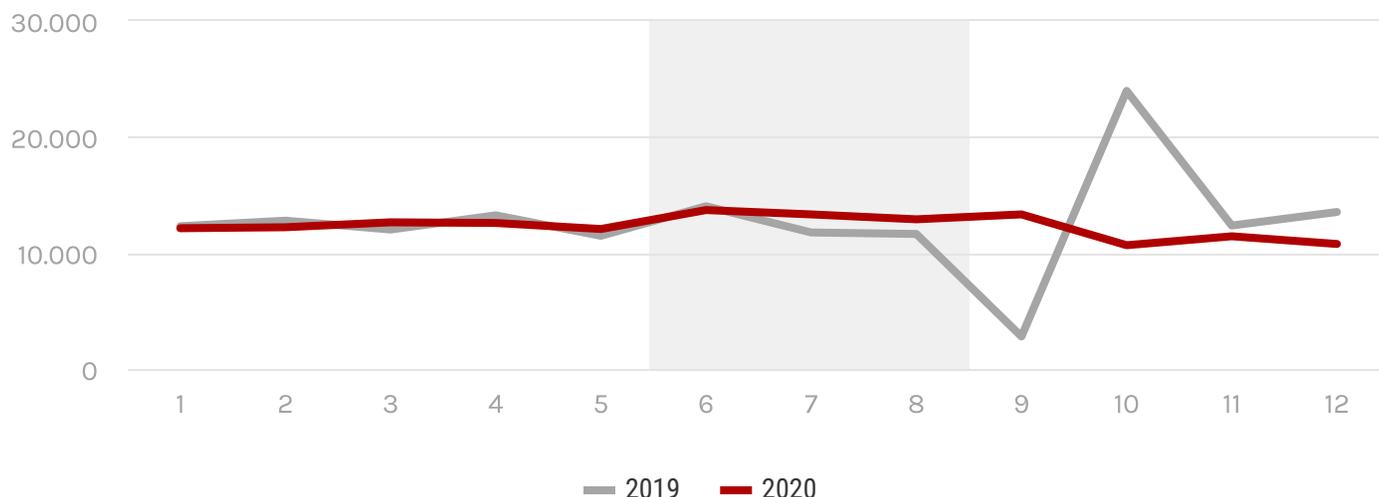
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



5.3.

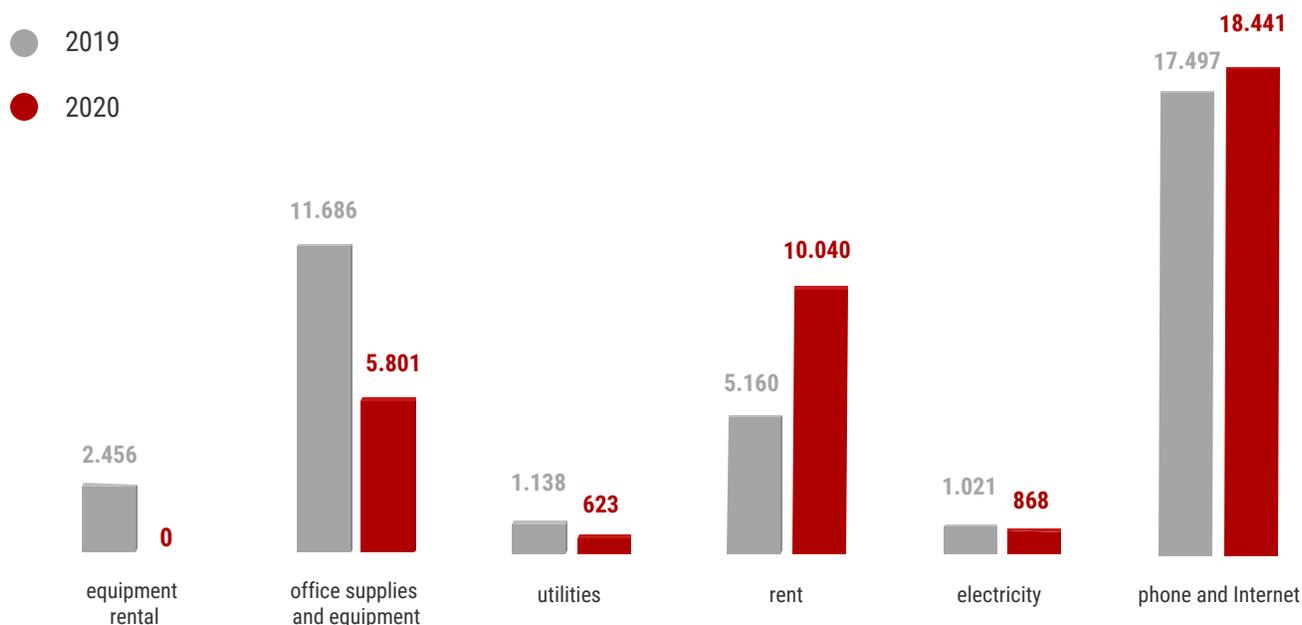
During July and August, slightly higher funds were paid to natural persons than in the previous year, but the differences are very small.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. In the election year, rent expenses increased, and there was a slight increase in telephone and Internet expenses.

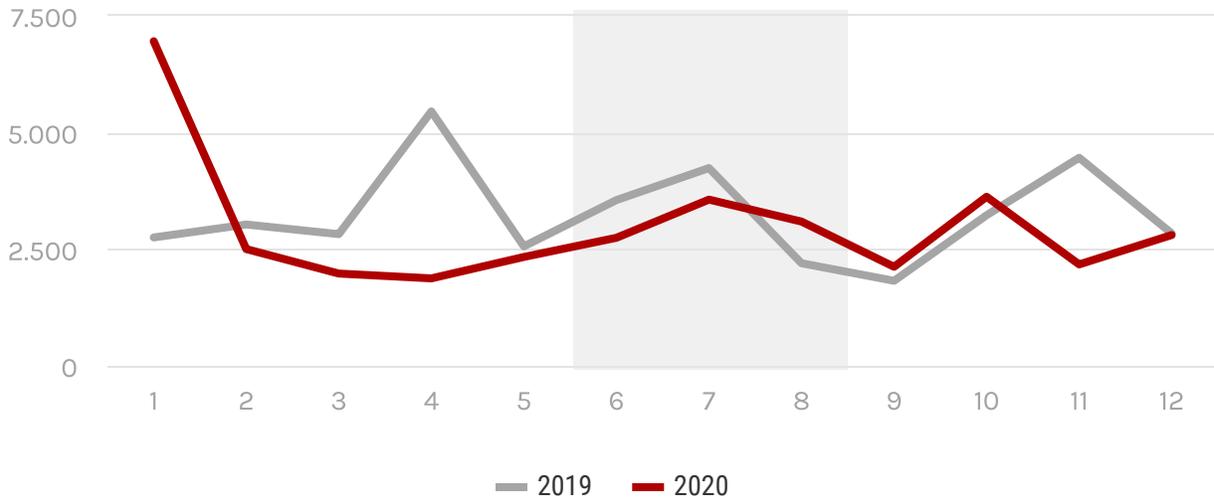
Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by types (2019 and 2020)



5.3.

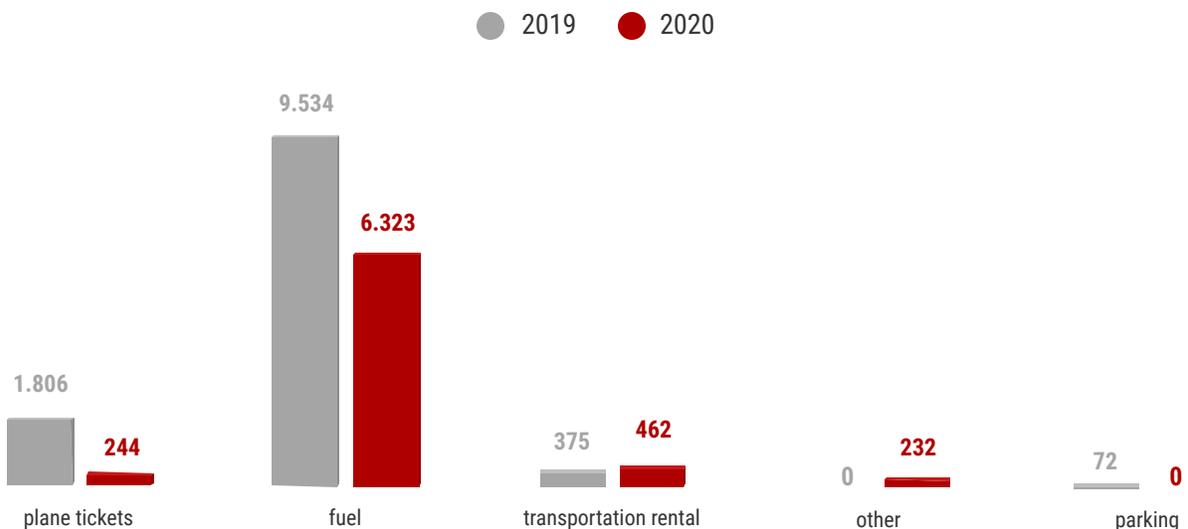
During August, **overhead expenses paid from the account for regular funding** are slightly higher than in the previous year.

Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by months (2019 and 2020)



Transportation. During the election year, transportation expenses from the account for financing the regular operation of the party were lower compared to the previous one. **In February 2020 alone, these expenses are many times higher than in the same period of the previous year,** and they are lower during the election campaign.

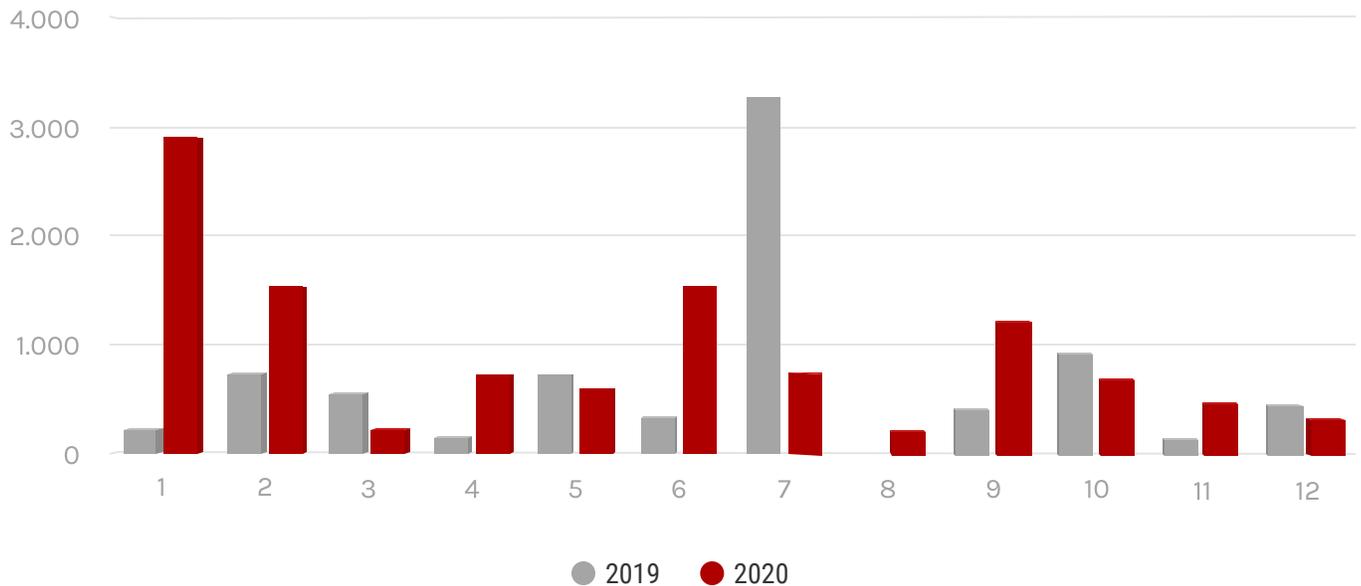
Expenses of transportation from the funds for financing the regular operation, by types (2019 and 2020)



5.3.

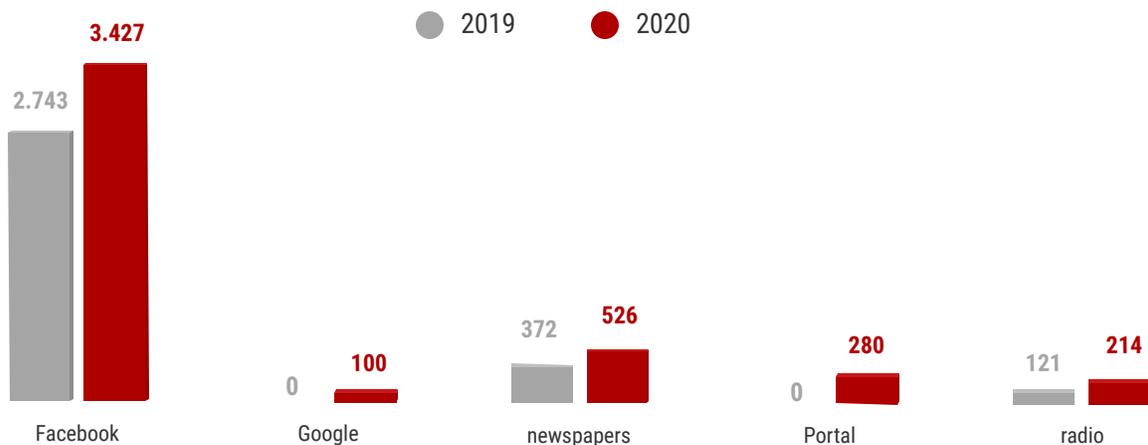
Promotional materials. In June 2020, the expenses of promotional materials from the account for regular financing of the party increased compared to the previous year. This increase was due to the payment to the company Komo LLC of around one thousand euros.

Expenses of promotional materials from the funds for financing the regular operation, by months (2019 and 2020)



Advertising. In the election year, the expenses of advertising paid from the account for regular financing increased compared to the previous one, but these are small amounts. The largest increase is in the expenses of advertising on Facebook, of around 700 euros.

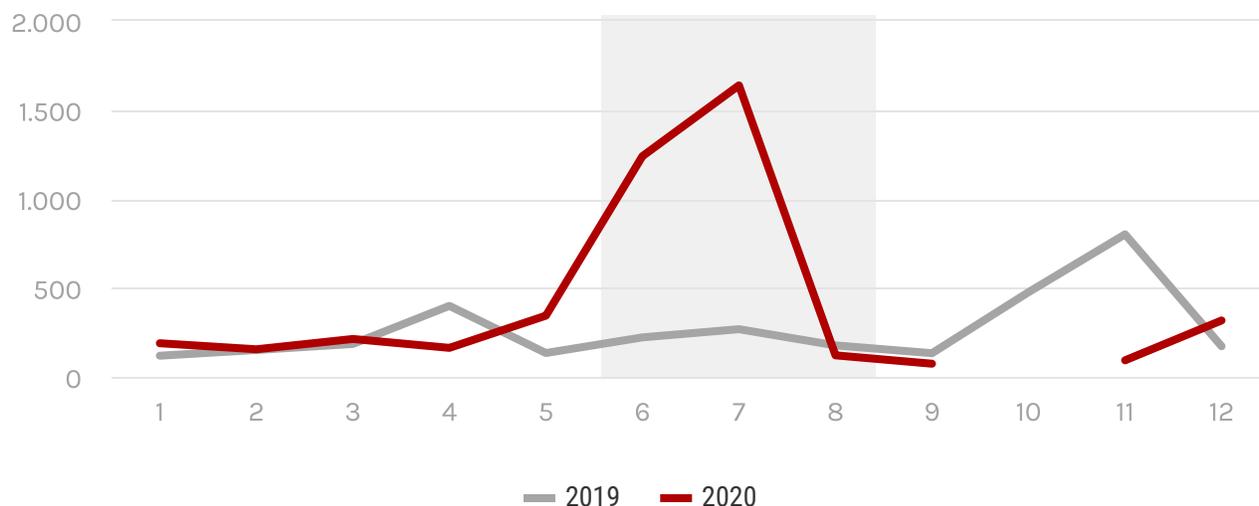
Advertising expenses from the funds for financing the regular operation, by types (2019 and 2020)



5.3.

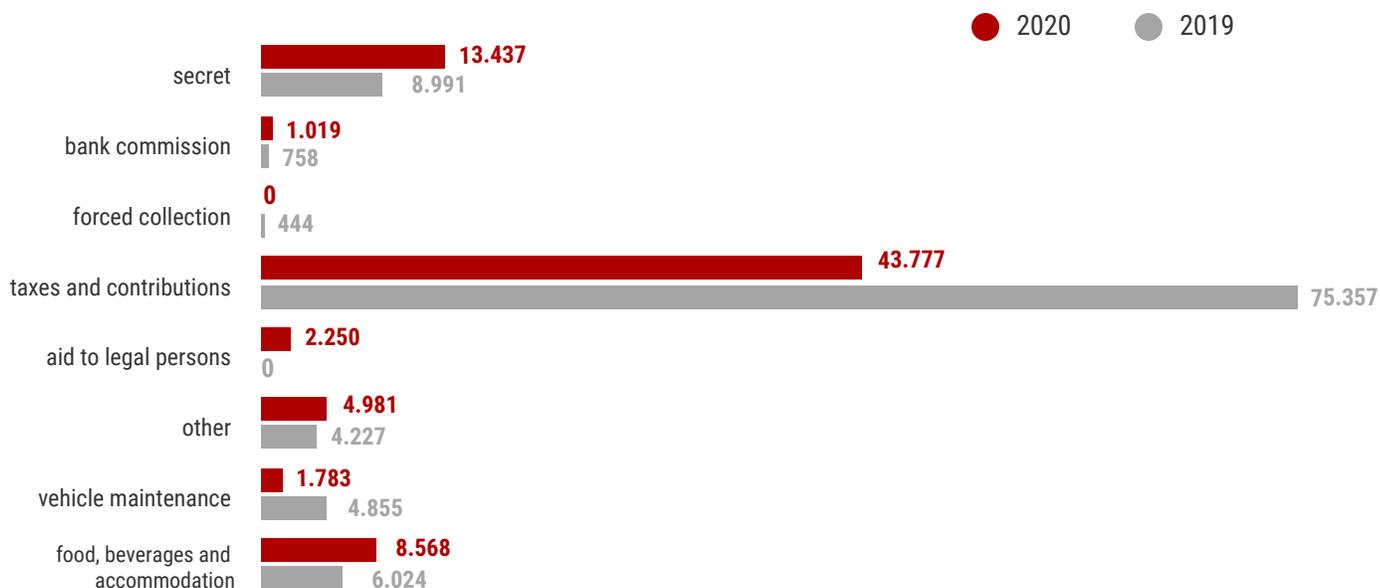
In June and July 2020, the expenses of advertising on Facebook, paid from the account for regular financing, increased.

Advertising expenses from the funds for financing the regular operation, by months (2019 and 2020)



Other expenses. The expenses of food, beverages and accommodation increased, as well as expenses that cannot be classified because the requested data have not been submitted, as well as other smaller expenses. **Although the total amount of paid salaries in 2020 slightly increased (from 102 to 104 thousand euros), from April to September of that year, the expenses of taxes and contributions are ten times lower than in the previous year.**

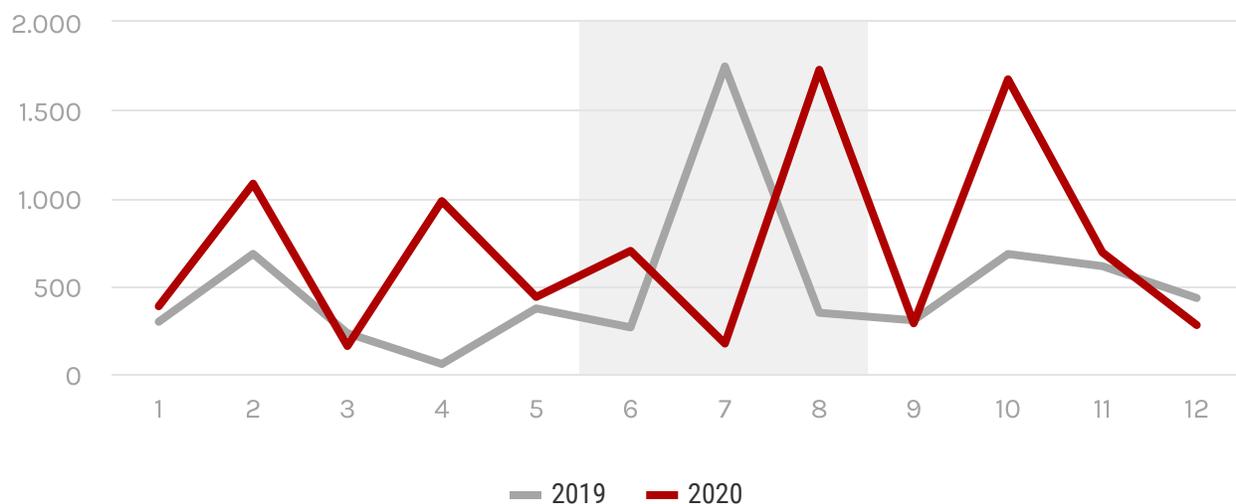
Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



5.3.

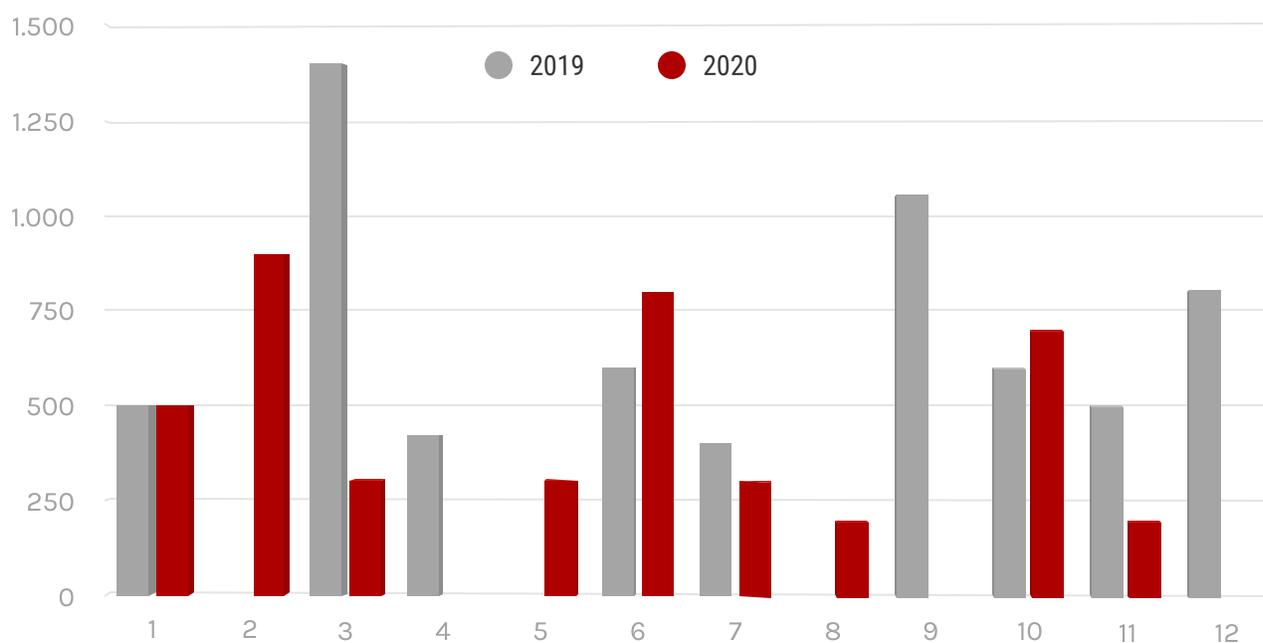
The expenses of food and beverages increased in August 2020, the month when the elections were held, by around 1.4 thousand euros compared to the previous year.

Expenses of food and beverages from the funds for financing the regular operation, by months (2019 and 2020)



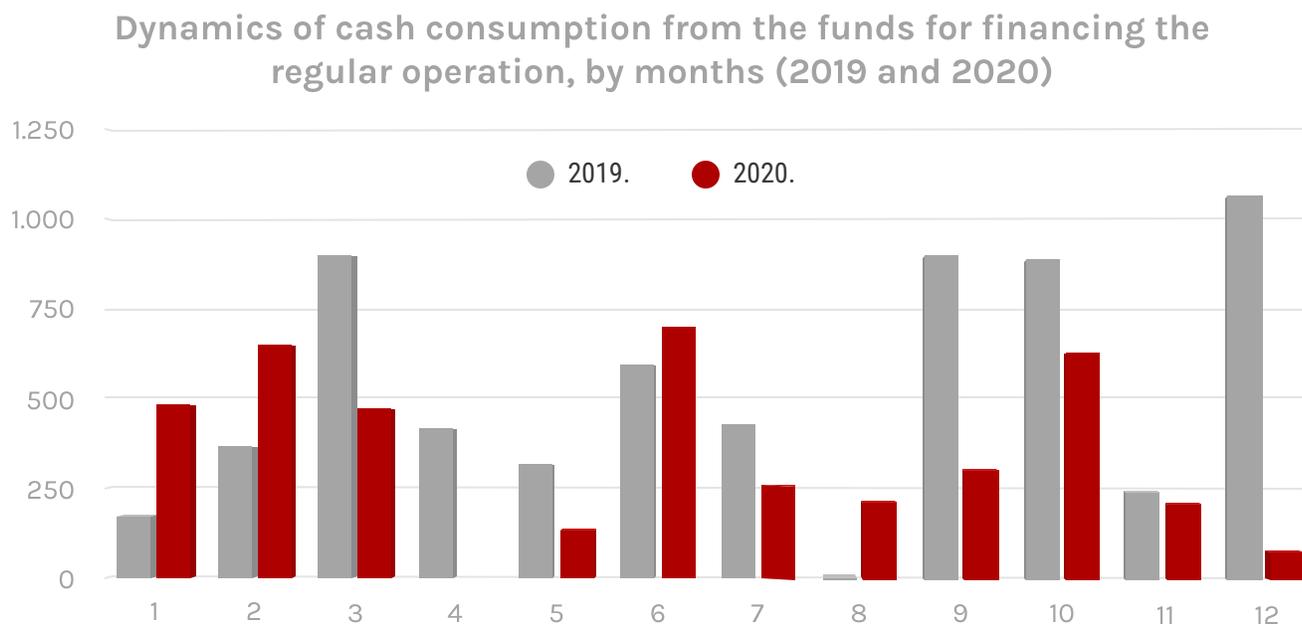
Cash money. In June 2020, there were slightly more cash withdrawals than in the same period of the previous year.

Dynamics of cash withdrawal from the funds for financing the regular operation, by months (2019 and 2020)



5.3.

During June 2020, more cash was spent than in the same period of the previous year, but the amounts are very small.



5.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

By the end of 2020, all reported campaign expenses for the parliamentary elections had been paid from the separate bank account of SDP.

D.6.

Socialist People's Party (SNP)

In two years, the Socialist People's Party earned nearly 900,000 euros, of which it received over 700 from public sources.

This party is among parties with lower transparency, and its average score is 3.9.

During the election campaign, SNP had higher expenses of financing the regular operation compared to the same period of the previous year, as follows:



12 times higher expenses of office supplies,



multiple increase in the expenses of production of printed promotional materials,



four times higher rent expenses,



60% higher payments based on the temporary employment contract,



the expenses of food and beverages over two times higher,



cash payments from the treasury doubled.

From the account for financing the regular operation, SNP paid part of the campaign expenses of the coalition "For the Future of Montenegro", within which it participated in the parliamentary elections. However, at the end of 2021, there was a debt of around 19 thousand euros.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from SNP on inflows and outflows from 28 accounts during 2019 and 2020: three accounts of the head office, one business card of the party head office, one account of the Women's Forum, 20 bank accounts for 17 municipal boards [76], three bank accounts for local elections (Andrijevica, Gusinje and Tuzi).

In addition, we were provided with data on expenses paid from 25 treasuries, namely: the party head office, Women's Forum, 20 treasuries of municipal boards [77], three treasuries for financing the local elections campaign (Andrijevica, Gusinje and Tuzi).

Transparency scores of financial operations

Total transparency score [78] of financing of SNP is 3.9. Transparency score of the regular operation financing of that party is 3.9, while the transparency score of the election campaigns financing is 4.60.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	4.00	-	5.00	3.00
Head office	all statements submitted	no	all statements submitted	100% of transactions submitted in relation to SAI data
	complete data available for 100% of transactions	-	complete data available for 100% of transactions	complete data available for 54% of transactions, cash withdrawal from the account coincides with 7% of cash inflows
	5.00	-	-	4.00
Women's Forum	all statements submitted, there is no data in SAI reports	no	no	SAI has no data
	complete data available for 100% of transactions	-	-	complete data available for 50% of transactions, cash withdrawal from the account coincides with cash inflows
	3.00	-	-	3.00
Municipal boards	all statements submitted, data for 16 municipal boards submitted, 7 are missing and are listed in the financial statements	no	no	100% of transactions submitted in relation to SAI data on 20 municipal boards
	complete data available for 100% of transactions	-	-	complete data available for 62% of transactions, cash withdrawal from the account coincides with inflows of 7 treasuries, i.e. 35%
Transparency score of the regular operation financing				3.90

[76] Statements for 20 bank accounts of municipal boards in the following municipalities were submitted: Andrijevica, Bar, Berane (two accounts), Bijelo Polje, Budva, Danilovgrad, Herceg Novi, Kotor, Mojkovac, Nikšić, Pljevlja (two accounts), Plužine, Podgorica, Šavnik, Tivat, Ulcinj (two accounts) and Žabljak. By inspecting the data on the bank accounts of the party published in the financial statements, we found that that party did not provide us with information on 15 accounts of municipal boards.

[77] Treasuries were submitted for the municipal boards in: Andrijevica, Bar, Berane, Bijelo Polje, Budva, Cetinje, Danilovgrad, Gusinje, Herceg Novi, Kotor, Mojkovac, Nikšić, Pljevlja, Plužine, Plav, Podgorica, Rožaje, Šavnik, Ulcinj and Žabljak.

[78] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

6.1.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	<i>other party in the coalition was in charge of the finances</i>	-	-	-
Kotor	<i>other party in the coalition was in charge of the finances</i>	-	-	-
Budva	<i>other party in the coalition was in charge of the finances</i>	-	-	-
Tivat	<i>did not participate</i>	-	-	-
	5.00	-	-	4.00
Tuzi	all statements submitted	no	no	SAI has no data
	complete data available for 100% of transactions	-	-	complete data available for 50% of transactions, cash withdrawal from the account coincides with the treasury inflows
	5.00	-	-	4.00
Andrijevica	all statements submitted	no	no	SAI has no data
	complete data available for 100% of transactions	-	-	complete data available for 50% of transactions, cash withdrawal from the account coincides with the treasury inflows
	5.00	-	-	4.00
Gusinje	all statements submitted	no	no	SAI has no data
	complete data available for 100% of transactions	-	-	complete data available for 50% of transactions, cash withdrawal from the account coincides with the treasury inflows
Transparency score of the election campaign financing				4.60

Total transparency score of the party financing

3.9

6.1.

What is missing?

Financial statements of the SNP for 2019 [79] state that they had 34 active accounts, and they published data for 23, while in 2020, they had 40 bank accounts [80], and statements were published for only 18 accounts. While for some municipal boards two accounts each are listed, we did not receive statements from any bank account for boards in the following municipalities, although they are mentioned in the SNP's financial reports: Cetinje, Tuzi, Kolašin, Plav, Rožaje, Gusinje and Petnjica.

The submitted data on the expenses paid from 20 treasuries are not complete, and it is not possible to determine how many treasuries that party has, because it is not stated in either the financial statements or audit reports.

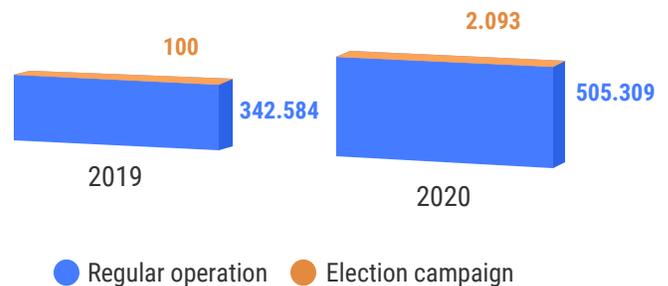
6.2.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues published by SNP in 2019 were **around 340 thousand euros**, and **over 500 thousand euros** in 2020, as well as two thousand to finance campaigns for local elections. [81]

Available revenues for financing the regular operation and election campaigns (2019 and 2020)



[79] https://www.antikorupcija.me/media/documents/Godi%C5%A1nji_konsolidovani_finansijski_izvje%C5%A1taj_za_2019._-_Socijalisti%C4%8Dka_narodna_partija.pdf, Page 2 of the Report.

[80] https://www.antikorupcija.me/media/documents/Godi%C5%A1nji_konsolidovani_finansijski_izvje%C5%A1taj_za_2020._-_Socijalisti%C4%8Dka_narodna_8MtGy8y.pdf, Page 3 of the Report.

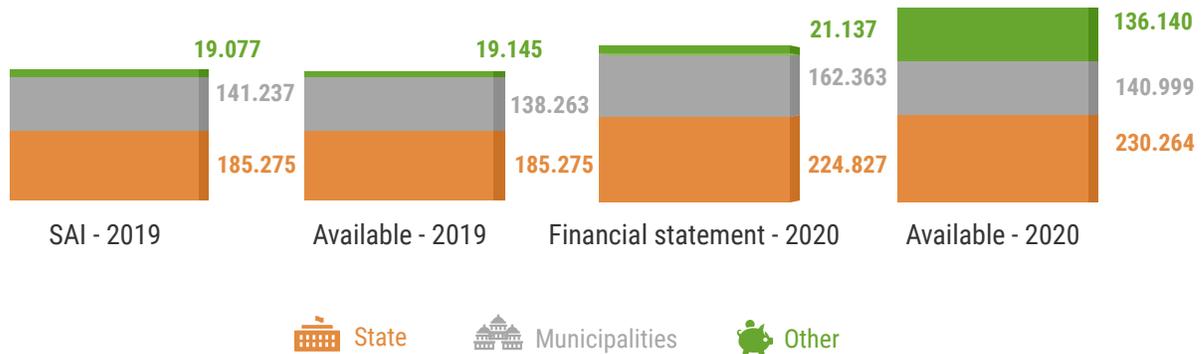
[81] In its official report, SNP states that it had campaign expenses for the parliamentary elections, but did not open a separate bank account for them, so for that reason they are not shown in this chart. More detailed information is given in the last part of this chapter, which deals with the payment of election campaign expenses by that party.

6.2.

Comparison with auditor's data and financial statements

SAI did the SNP's audit report only for 2019, and it shows that the party had slightly higher payments from the municipalities than the data provided to us show. The amounts of funds paid from the municipal budget differ in the financial reports of that party for 2020 for around 20 thousand euros in relation to the data submitted to us. Since there is no audit report for that year, it is not possible to determine whether the municipalities really paid additional funds to SNP compared to the data provided to us, or whether it is calculated but uncollected revenues.

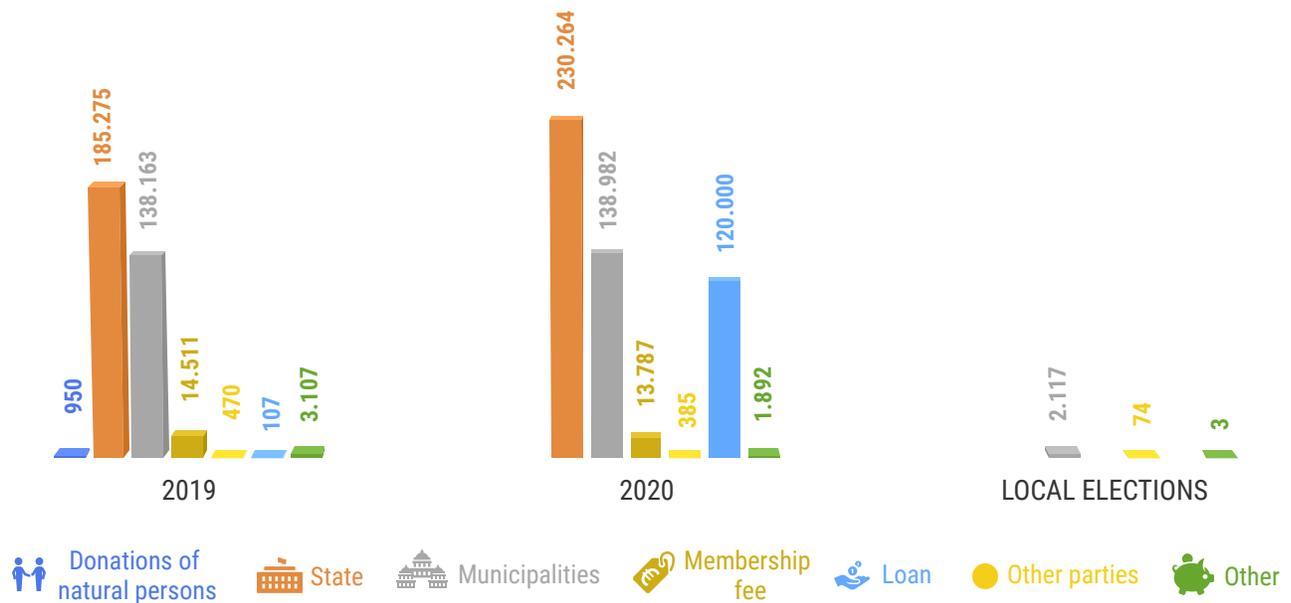
Comparison of SAI data and financial statements on the total revenues with available information from all available accounts in 2019 and 2020



Revenue sources

In addition to increased funds from the state budget, which is the main available source of funding for SNP, during 2020, the party took a loan worth around 120 thousand euros. On August 13, the funds provided from the loan were paid into the account for financing the regular operation of the party.

Revenue sources in 2019 and 2020



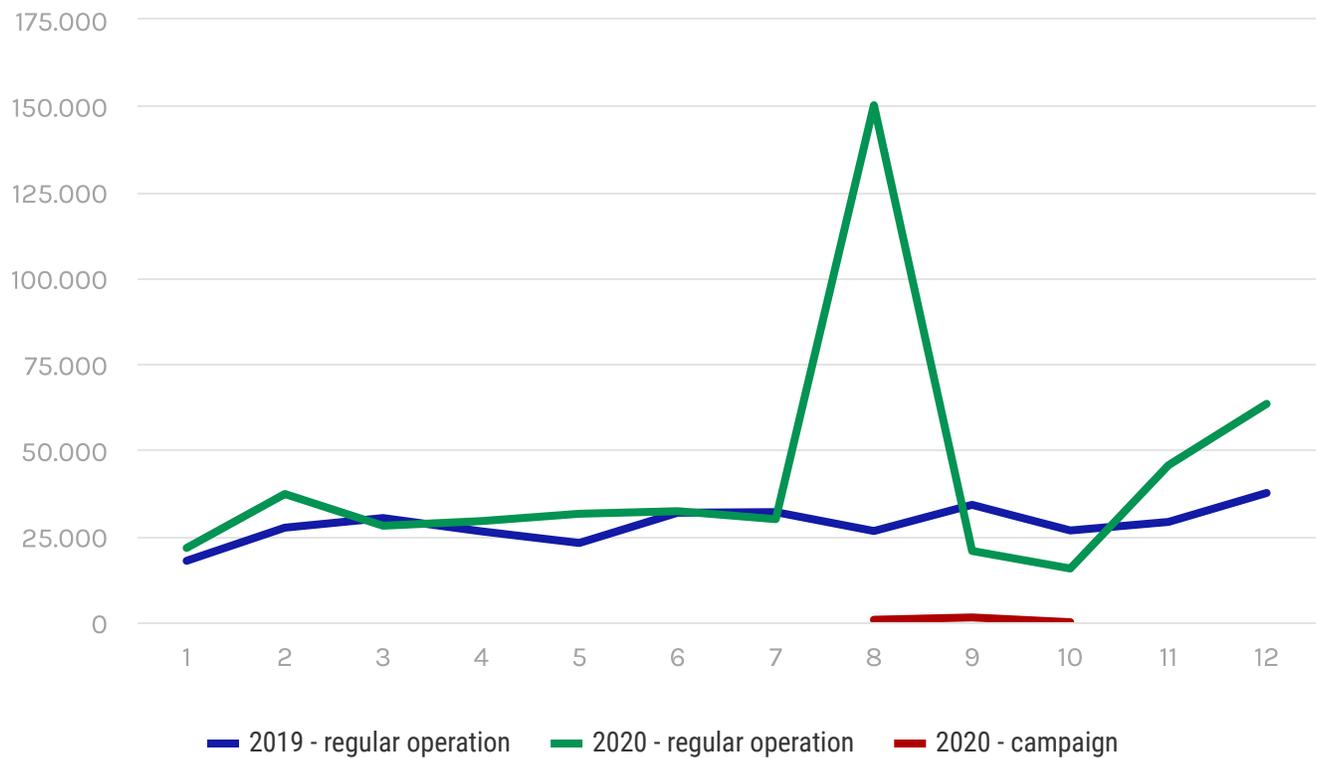
According to available data, funds from municipal budgets were mainly transferred to the account of the head office, but some municipal payments also went to municipal boards. [82] The largest payments were from the Capital City Podgorica, Kotor, Plužine and Bijelo Polje. Funds from the head office account were partly transferred to the bank accounts of the municipal boards.

[82] For example, Municipalities of Herceg Novi, Danilovgrad, Kotor, Mojkovac, Bar, Berane, Bijelo Polje.

Average monthly revenues and payment dynamics

In 2019 and 2020, the average monthly income of SNP was around 30 thousand euros, except in August 2020, when they increased due to taking out a significant amount of loan.

All available revenues by months (2019 and 2020)

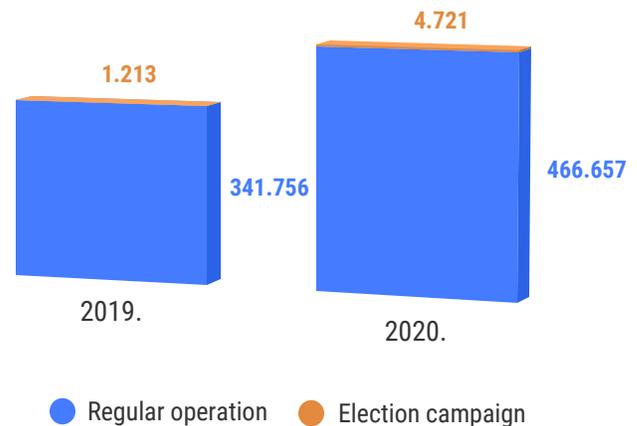


ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

In 2019, the expenses of SNP amounted to **around 340 thousand euros**, and **over 470 thousand euros** in 2020, of which less than five thousand were spent on the local elections campaign.

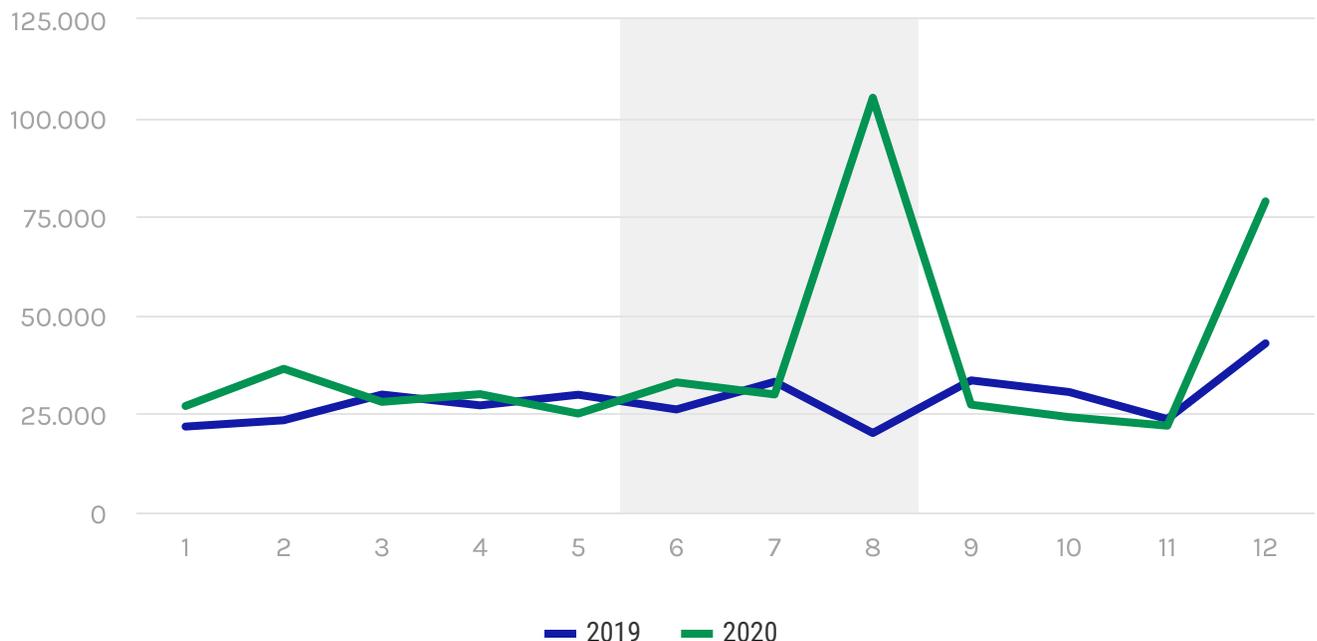
Available expenses of regular operation and election campaigns (2019 and 2020)



Monthly expenses

In August 2020, there was a sharp increase in expenses, mostly due to the payment of 75 thousand euros to the account of NOVA, which managed the account for financing the parliamentary elections campaign.

Expenses of financing the regular operation, by months (2019 and 2020)

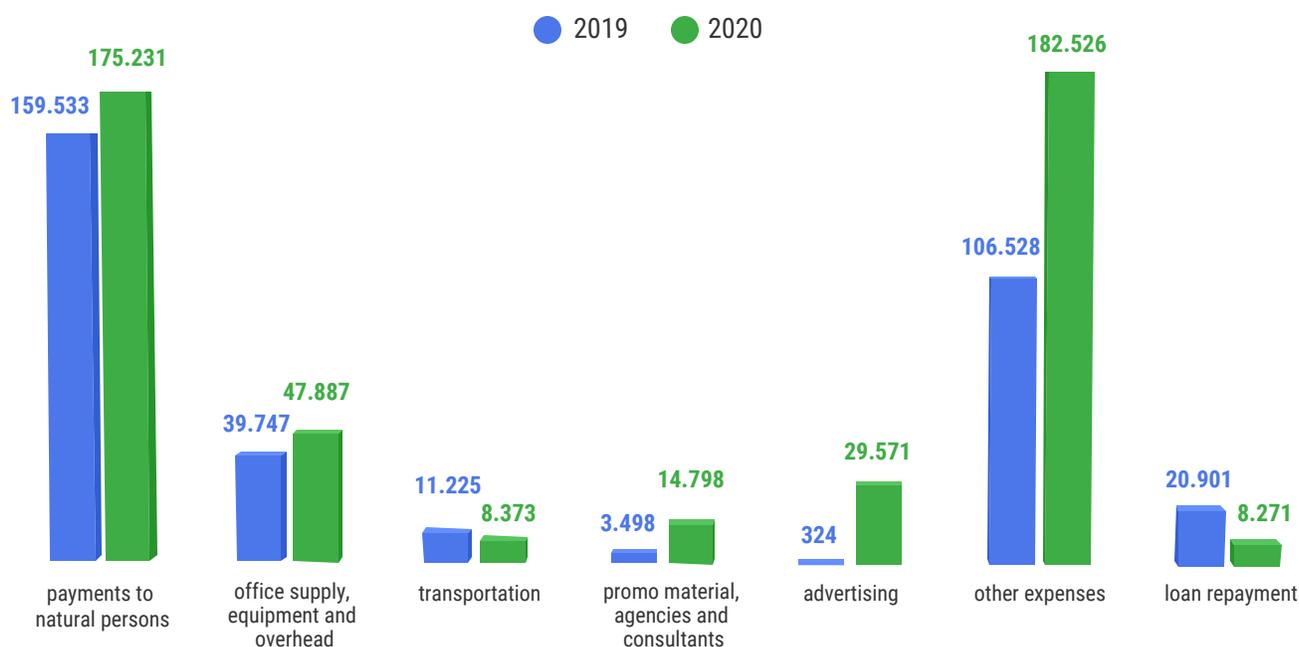


6.3.

Which expenses of the regular operation increased in the election year and during the election campaign?

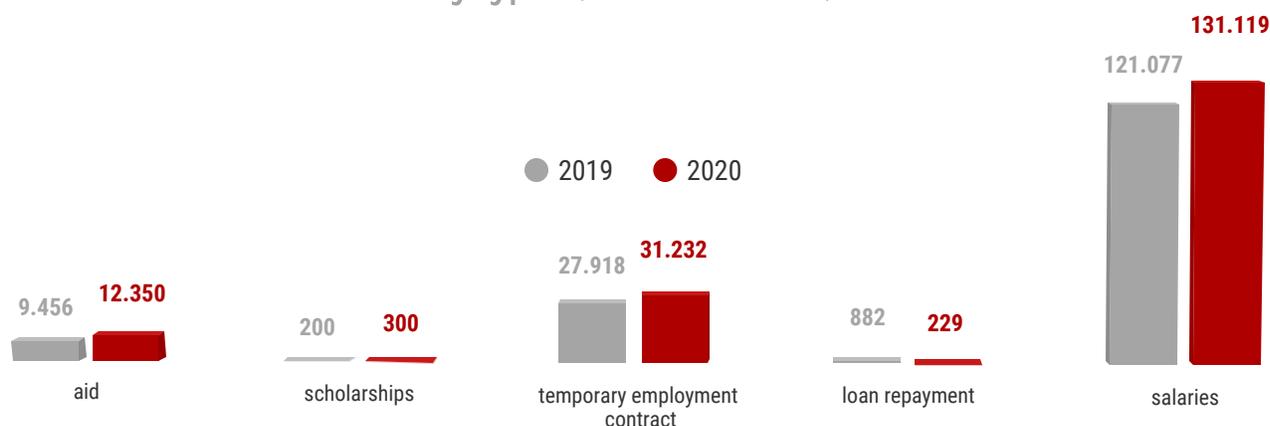
The highest expenses for regular financing relate to payments to natural persons that are slightly higher in the election year. The expenses of office supplies, equipment and overhead, promotional materials, advertising on social networks and in the media increased, while the largest increase was in the category of other expenses.

Expenses of regular operation, by categories (2019 and 2020)



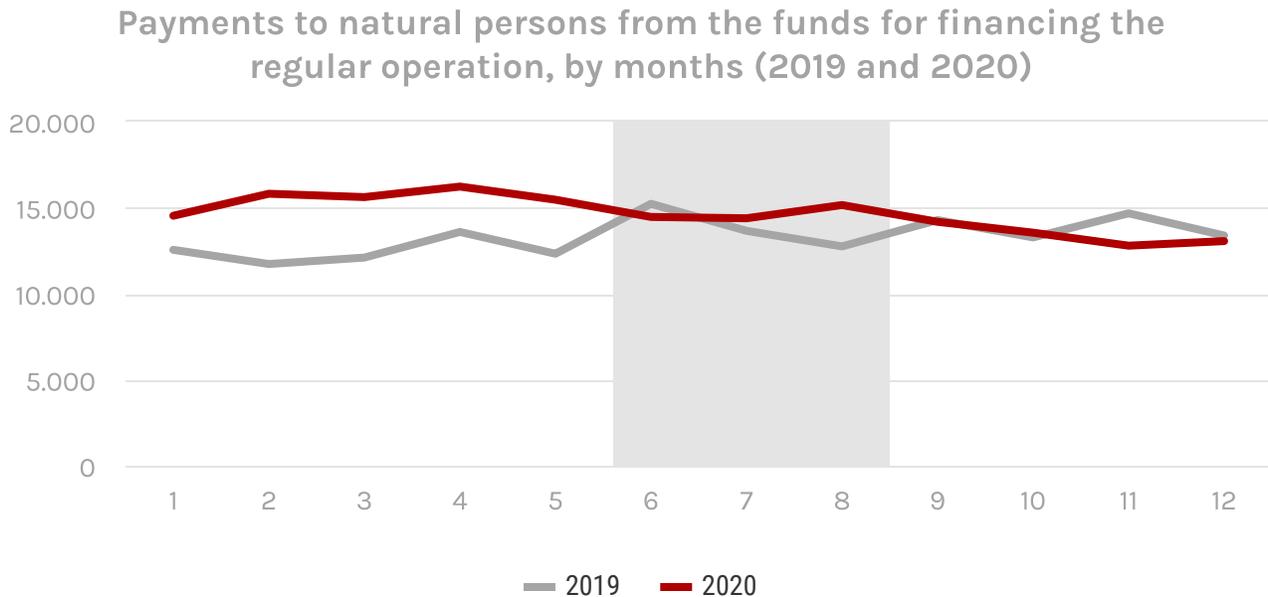
Payments to natural persons. In the election year, higher salaries of employees in the party were paid than in the previous year, and payments based on temporary employment contracts and aid to natural persons also increased.

Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)

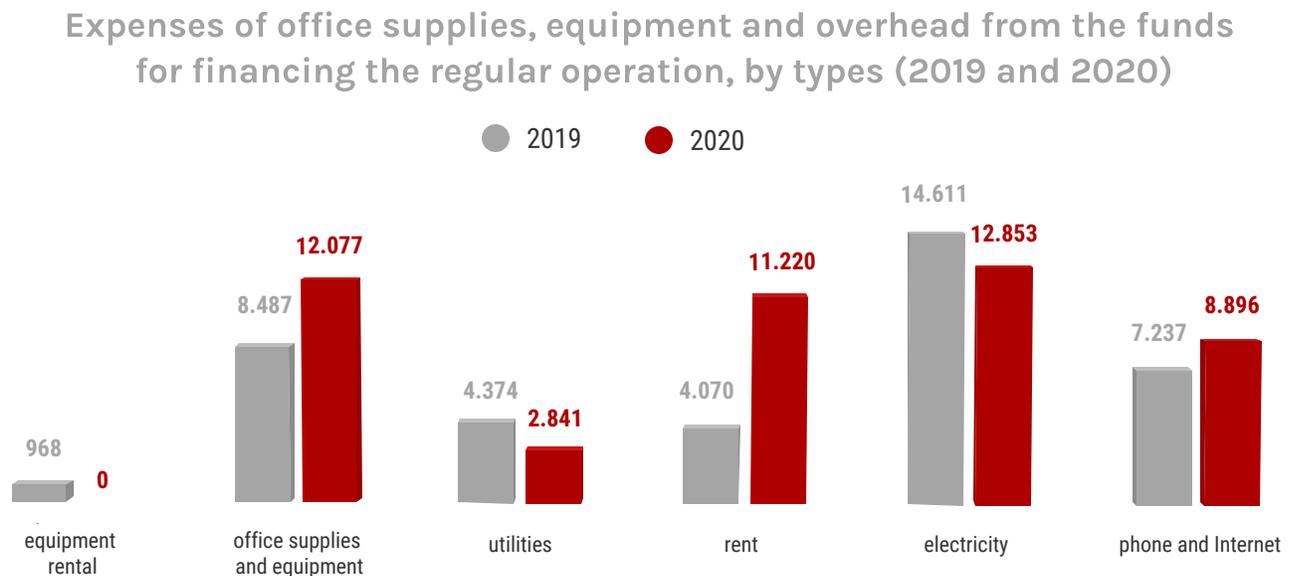


6.3.

In the first half of the election year, as well as during August, when the elections were held, payments to natural persons increased, mainly due to the increase in the expenses of temporary employment contracts.



Office supplies, equipment and overhead. The expenses of office supplies and equipment, rent, phone and Internet increased in the election year compared to the previous one.

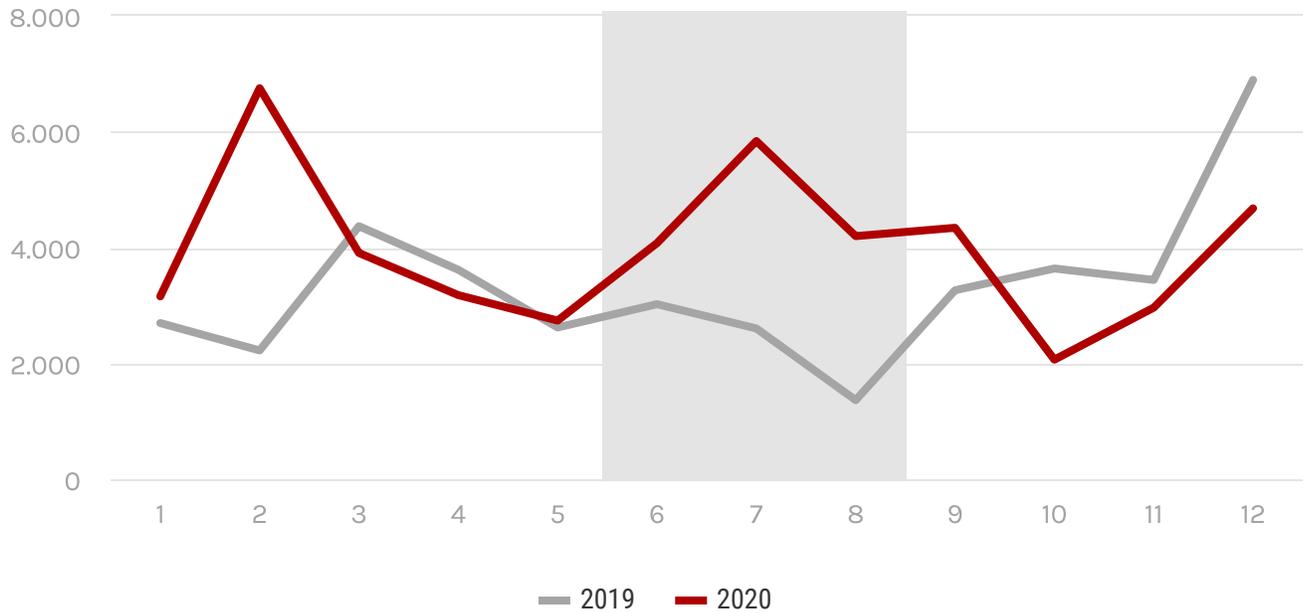


These expenses are twice as high during the election campaign as in the same period of the previous year. The largest increase is related to the purchase in the gift shop, LLC Gadget shop in July 2020.

6.3.

In addition, the expenses of phone and internet doubled in August 2020 compared to 2019.

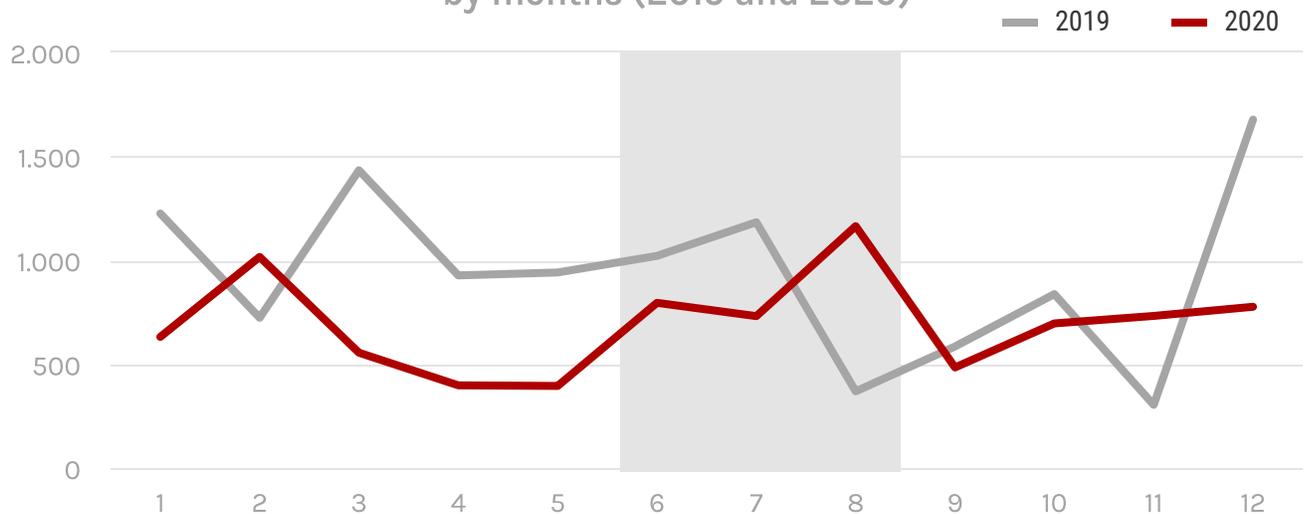
Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by months (2019 and 2020)



Rent expenses increased during the election year, but not only during the election campaign period.

Transportation. During August 2020, transportation expenses tripled compared to the same month in 2019. This is an increase in fuel costs.

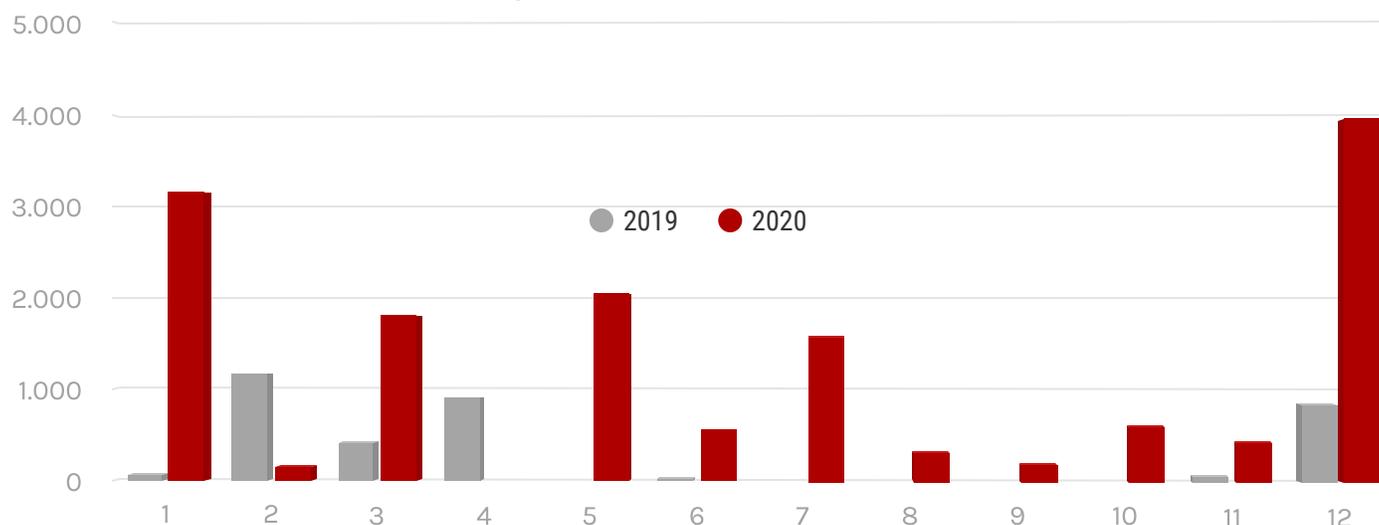
Expenses of transportation from the funds for financing the regular operation, by months (2019 and 2020)



6.3.

Promotional materials. In the election year, the expenses of promotional materials are four times higher than in the previous year. During the election campaign, the party paid mostly for the services of the companies Madžarević - Biro konto, Marker LLC and MN Grafokarton.

Expenses of promotional materials from funds for financing the regular operation, by months (2019 and 2020)



Advertising. SNP had very low advertising expenses until December 2020, when they paid 10 thousand euros to TV Vijesti, as well as 18 thousand euros to the newspaper and the portal Vijesti. The data on these payments show the same account numbers as in the case of the expenses of the parliamentary election campaign. That is, it is about campaign expenses which, according to the special protocol of the members of the coalition "For the Future of Montenegro", were to be paid by the SNP. [83]

Advertising expenses from the funds for financing the regular operation, by months (2019 and 2020)

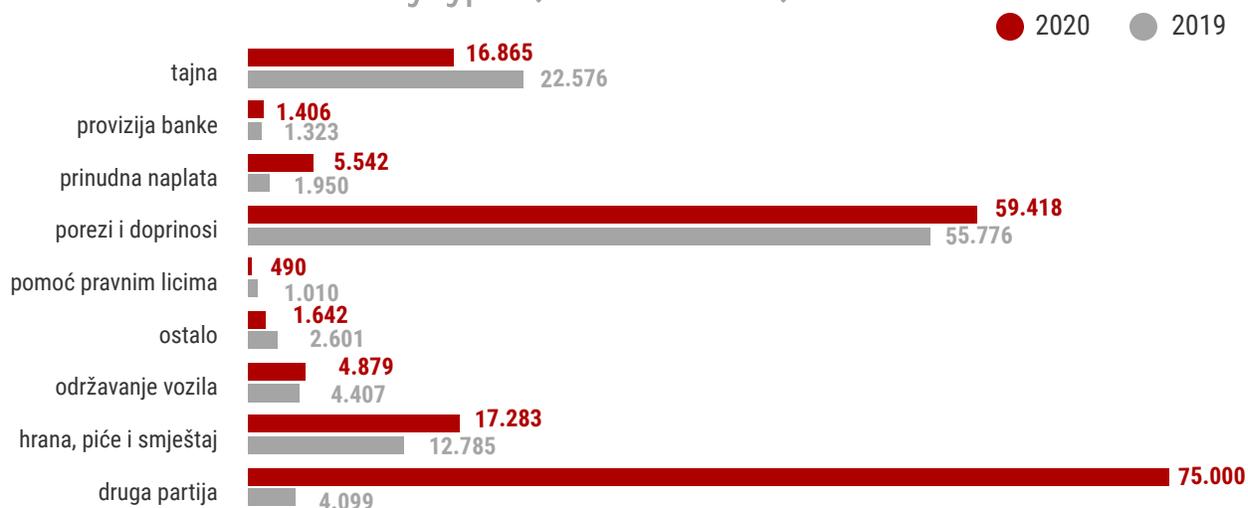


[83] More detailed information is given in Chapter D.3. New Serb Democracy, 3.4. Payment of election campaign expenses.

6.3.

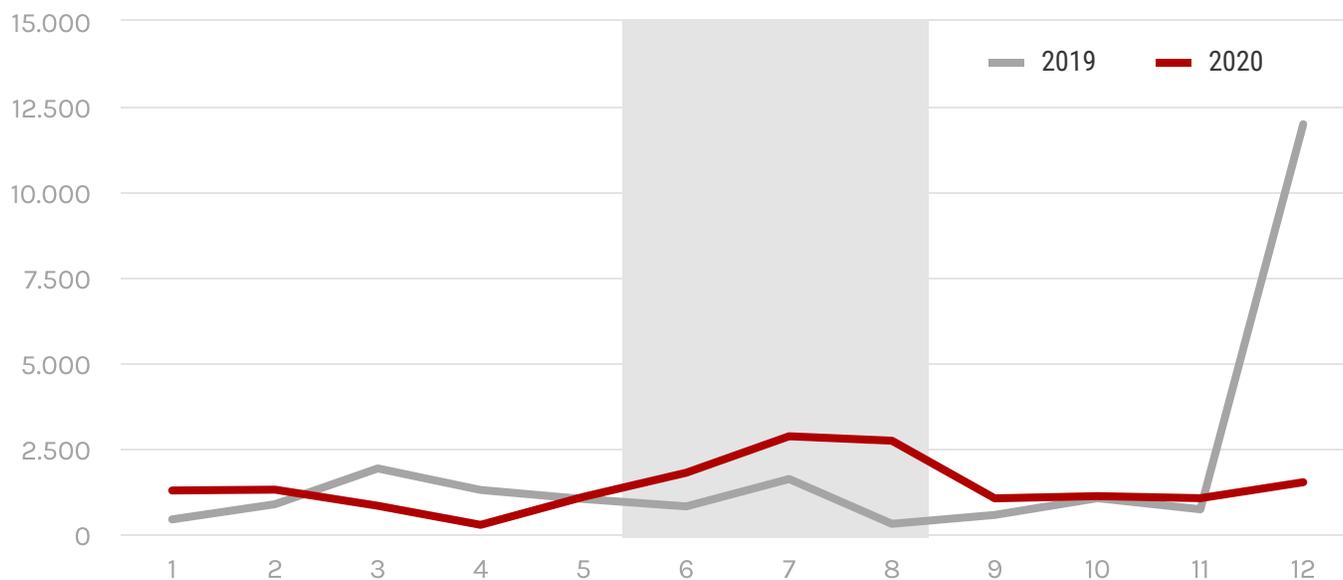
Other expenses. In August 2020, other expenses increased, mainly due to the transfer of 75 thousand euros to the account of NOVA. However, in the election year, the expenses of food and beverages also increased. **In August 2020, expenses of food and beverages were nearly five times higher than in the same month of the previous year.**

Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



Cash money. While the data on cash withdrawals are completely unreliable, the information on expenses paid from the treasury is somewhat more detailed, however, the purpose of the payment of money cannot be determined from it either. **During the election campaign, almost twice as much cash was paid from the treasury then in the previous year.**

Dynamics of cash consumption from the funds for financing the regular operation, by months (2019 and 2020)



PAYMENT OF ELECTION CAMPAIGN EXPENSES

In the financial statement for 2020, SNP states that it had nearly 153 thousand euros in campaign expenses for the parliamentary elections.

Orazac TNOFIK

Troškovi nastali po osnovu finansiranja izborne kampanje		
Izborna kampanja	Period održavanja	Ukupno (u €)
Parlamentarni izbori Za budućnost Crne Gore	30.08.2020.	152.855,91
Lokalni izbori Andrijevića	30.08.2020.	3.893,26
Lokalni izbori Gusinje	30.08.2020.	465,06
Ukupno:		157.214,23

Photo 19: Excerpt from the SNP's financial statement for 2020, page 16

However, SNP did not have a separate account for financing the parliamentary elections campaign, as required by law.

That party paid 75,000 euros into a separate account opened by NOVA to fund the election campaign on behalf of their coalition.

In addition, SNP signed the Protocol with other members of the coalition "For the Future of Montenegro" and undertook to pay the election campaign expenses of nearly 78 thousand euros.

According to that Protocol, SNP undertook to pay over 28 thousand euros to the Daily Press, i.e. the newspaper and the portal Vijesti, and settled that debt in March 2021.

SNP also took over a debt of over 40,000 euros to TV Vijesti. By the end of 2020, they paid 10 thousand euros of that debt, and additional 20 thousand during the next year. Therefore, at the end of 2021, the party's debt to TV Vijesti amounted to 10 thousand euros.

The party also took over a debt of nearly 9,000 euros to the Đoković company. SNP's finances show only at the end of 2021 they paid only 1.5 thousand euros to the Đoković company, thus, the remaining debt is around 7.5 thousand.

6.4.

Подгорица
21.10.2020. године

УРЕ
21 10 20

ДЕМОКРАТСКА НАРОДНА ПАРТИЈА
ЦРНЕ ГОРЕ
Број 692/20
Подгорица 21.10.2020. год.

ПРОТОКОЛ О СРАВЊЕЊУ

ЧЛАН 1

Овим Протоколом се дефинише испуњење заједничких обавеза, између конституената Коалиције ЗА БУДУЋНОСТ ЦРНЕ ГОРЕ, Нове српске демократије, Покрета за промјене и Демократске народне партије, Социјалистичке народне партије, Праве Црне Горе, Уједињене Црне Горе и Радничке партије насталих као заједнички трошкови поводом изборне кампање и накнадне услуге рекламе "ХВАЛА ТИ ЦРНА ГОРО" (15.000,00€) ових политичких субјеката

ЧЛАН 2

Потписници овог Протокола се обавезују да предметне обавезе, КОЈЕ ИЗНОСЕ 434.555,64 измире на следећи начин:

НСД		
	PINK MEDIA M	81.513,29
	LIMANAKI STUDIO	50.000,00
	DRUSTVO ZA RAVNOPRAVNOST	15.322,50
	УКУПНО	146.835,79

ПЗП		
	PINK MEDIA M	81.575,44
	УКУПНО	81.575,44

ДНП		
	PINK MEDIA M	81.575,44
	УКУПНО	81.575,44

СНП		
	DAILY PRESS DOO	28.706,14
	TV VIJESTI	40.193,05
	DJOKOVIC DOO	8.956,42
	УКУПНО	77.855,61

Photo 20: Statement from the Protocol on the settlement of the Coalition "For the Future of Montenegro"

D.7.

Bosniak Party (BS)

The Bosniak Party earned 840 thousand euros in two years, of which as much as 770 thousand was paid from public sources.

That party is among highly transparent parties with an average score of 4.99.

BS increased the expenses of financing the regular operation during the election campaign compared to the same period of the previous year:



increased aid payments to natural persons,



increased expenses of salaries,



additional engagement of the media monitoring agency.

By the end of 2021, BS had not paid around eight thousand euros in reported campaign expenses from any publicly available account of that party, and the largest debts include:

- ⇒ Around 1.8 thousand euros was not paid to the company Format studio;
- ⇒ 1.3 thousand euros was not paid to the company H&MK from Rožaje;
- ⇒ Companies Professional solutions and Muminović were not paid around one thousand euros each.

That party submitted all statements from the account for 2020, while six statements are missing for 2021, mostly from the account of the women's organization.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from the Bosniak Party on inflows and outflows from nine accounts during 2019 and 2020: four accounts of the head office, two accounts of the Women's Forum, one payment card for financing election campaign expenses, and two election accounts - for the parliamentary and local elections in Gusinje. In addition, we were provided with data on the consumption of the head office's treasury.

Transparency scores of financial operations

Total transparency score [84] of financing of BS is 4.99. The transparency score of the regular operation financing of that party is 5.0, while the transparency score of the election campaigns financing is 4.7.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	-	-	5.00
Head Office	all statements submitted	no	no	100% of transactions submitted in relation to SAI data
	complete data available for 100% of transactions	-	-	complete data available for 100% of transactions, cash withdrawal from the account coincides with 100% of the cash inflow
	5.00	-	-	-
Women's Forum	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
	-	-	-	-
Municipal boards	no	no	no	no
	-	-	-	-
Transparency score of the regular operation financing				5.0

[84] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	-	5.00	-
2020 Elections	all statements submitted	no	all statements submitted	no
	complete data available for 100% of transactions	-	complete data available for 100% of transactions	-
Kotor	<i>did not participate</i>	-	-	-
Budva	<i>did not participate</i>	-	-	-
Tivat	<i>did not participate</i>	-	-	-
	0.00	-	-	-
Tuzi	data not submitted	no	no	no
	-	-	-	-
Andrijevisa	<i>did not participate</i>	-	-	-
	5.00	-	-	-
Gusinje	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Transparency score of the election campaigns financing				4.70
Total transparency score of the party financing				4.99

What is missing?

The Bosniak Party claims that it has no business cards to finance the regular operation, no foreign currency account, while its municipal boards have neither their own bank accounts nor treasuries.

That party participated in the local elections in Tuzi, for which it did not provide us with statements from the separate account opened for those purposes.

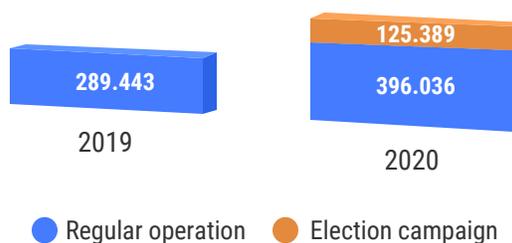
ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues reported by the Bosniak Party in 2019 were **around 290 thousand euros**.

In 2020, the revenues on the published accounts for regular financing amounted to **nearly 400 thousand**, and around 125 thousand euros was paid for the election campaign.

Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with auditor's data and financial statements

In 2019, we have data on two times lower amount of funds received from municipalities than the financial statements of that party show. Since no audit was done for that year, there is no data on whether it is calculated revenues that were not paid, or not all data were submitted to us.

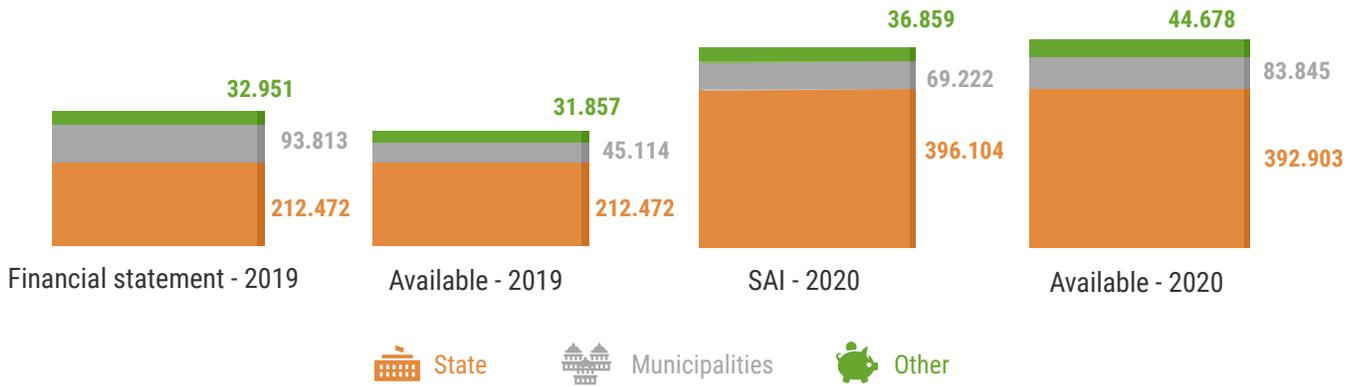
Available data on local self-government revenues for 2020 differ from the information in the audit report prepared for that year. However, SAI does not specify whether the revenues of the municipalities were calculated or collected, but only states them. [85]

[85] Page 24 of the report.

<http://www.dri.co.me/1/doc/izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1tja%20Bo%C5%A1nja%C3%A8ke%20stranke%20za%202020.%20godinu.pdf>.

7.2.

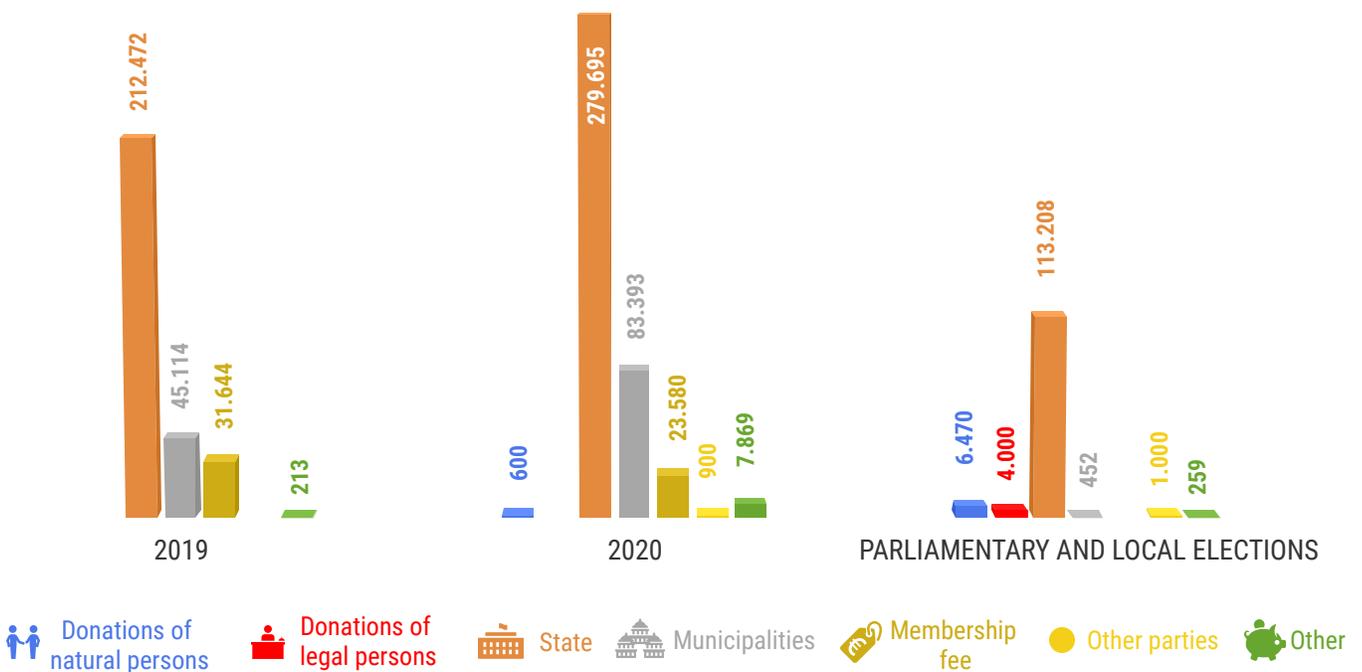
Comparison of the SAI data and financial statements on total revenues with available information from available accounts in 2019 and 2020



Revenue sources

Most of the official BS' revenues come from the state, followed by municipalities, membership fees, while donations are very small.

Available revenue sources in 2019 and 2020

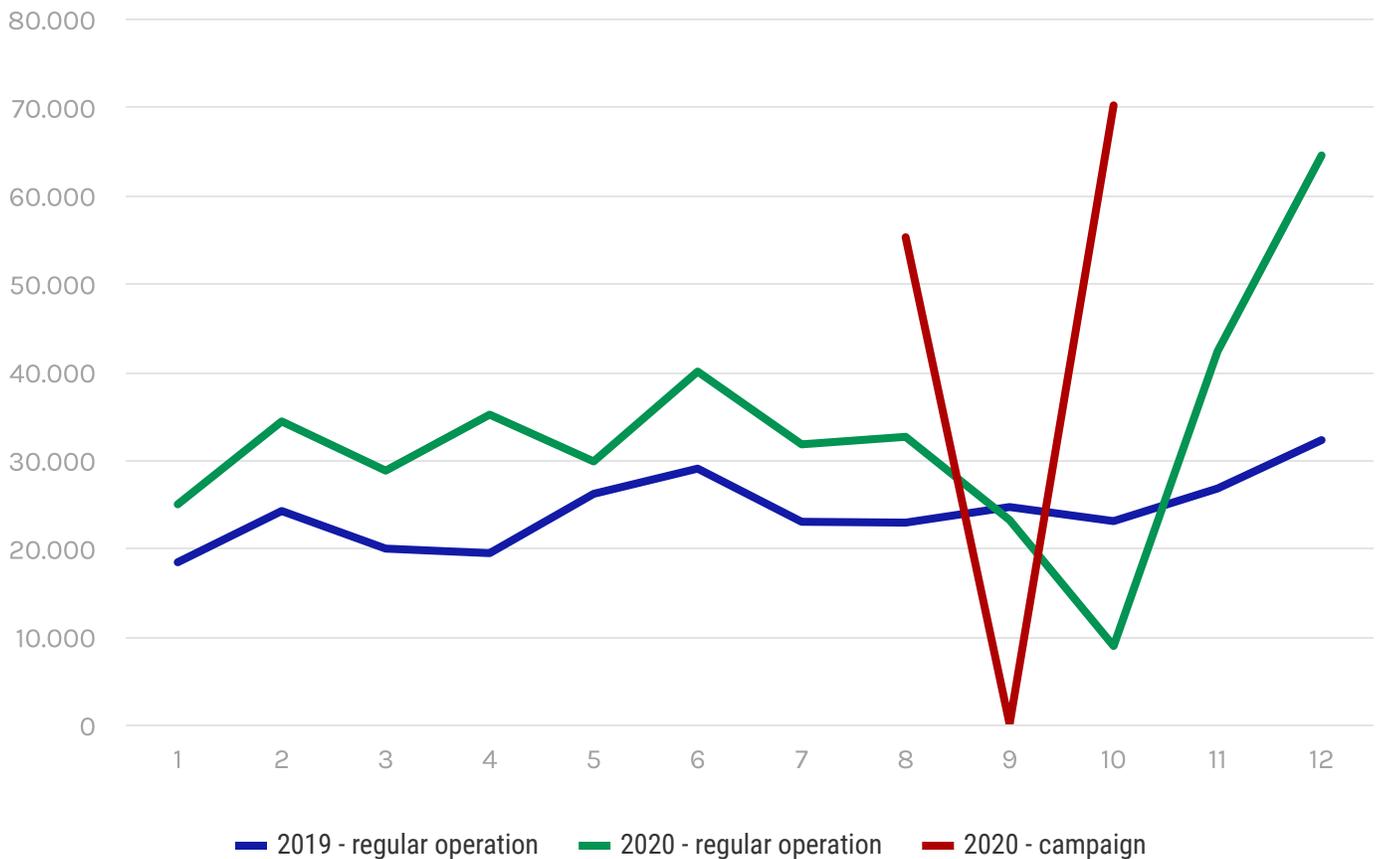


7.2.

Average monthly revenues and payment dynamics

In 2020, the average monthly revenue for regular operation of the BS was higher than in the previous year, except in October when there is a significant decline. In August and October 2020, the state paid funds to finance the parliamentary elections campaign, which led to a sharp increase in revenues.

All available revenues by months (2019 and 2020)

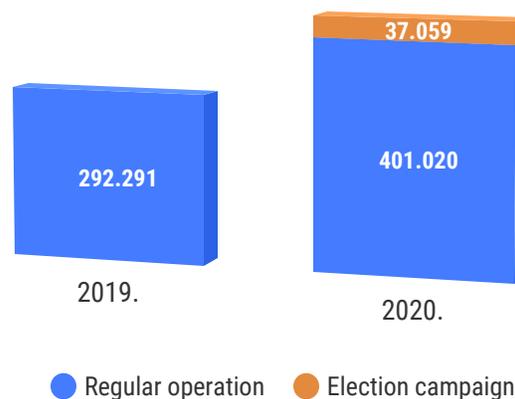


ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

The expenses of the regular operation of BS in 2019 amounted to **around 290 thousand euros**, and to **over 400 thousand euros** in 2020, while the available expenses of the election campaign were around 37 thousand euros.

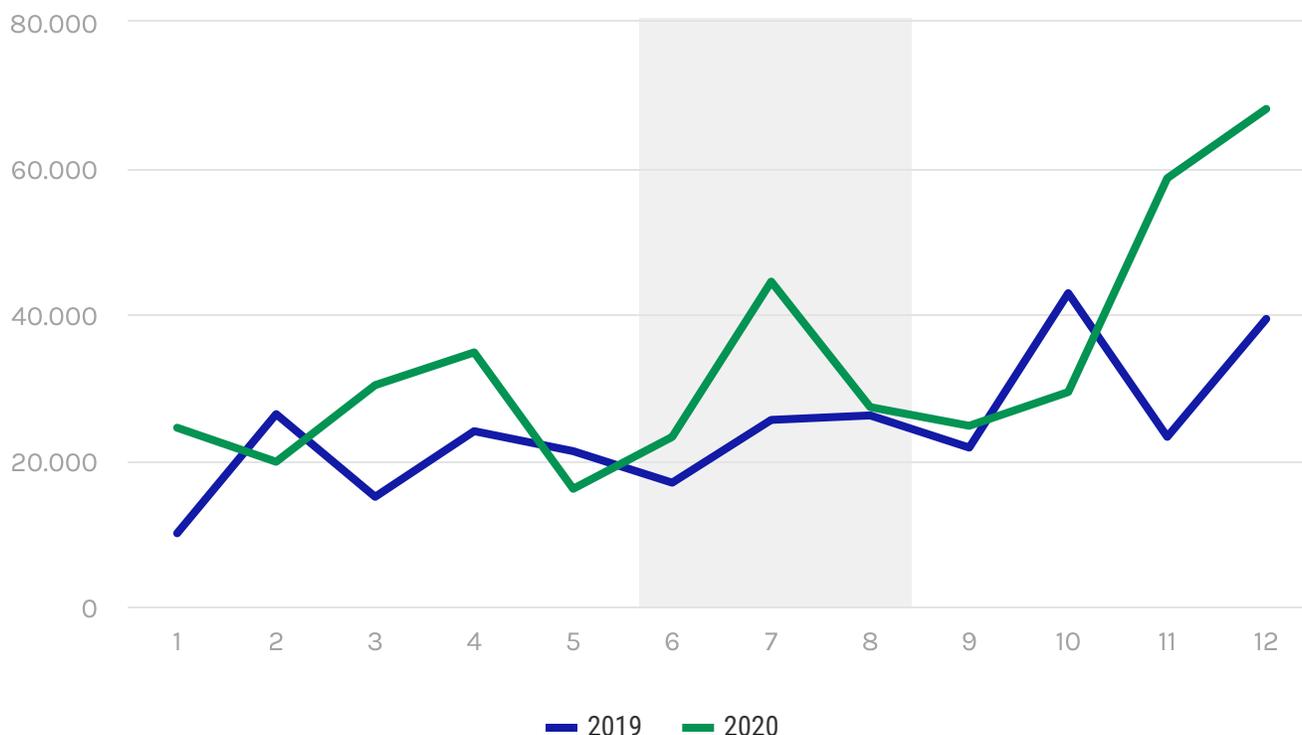
Available expenses of regular operation and election campaigns (2019 and 2020)



Monthly expenses

In June, and especially in July 2020, BS had **increased expenses of financing the regular operation compared to the same period of 2019**, and the increase is evident in the last two months of that year as well.

Expenses of financing the regular operation, by months (2019 and 2020)



7.3.

Which expenses of regular operation increased in the election year and during the election campaign?

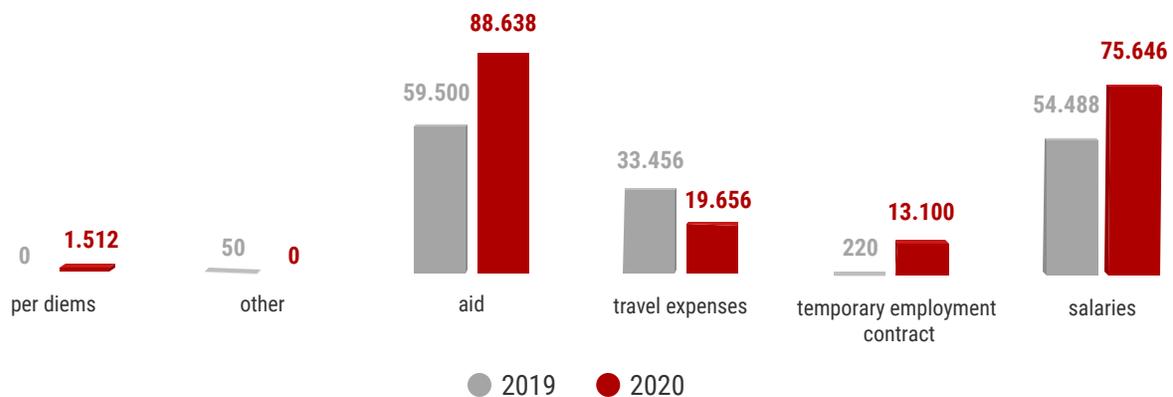
Largest expenses of the regular financing relate to payments to natural persons that increased in the election year. In the election year, the expenses of making promotional materials increased, while other expenses nearly doubled.

Expenses of regular operation, by categories (2019 and 2020)



Payments to natural persons. During the election year, aid payments to natural persons and salaries increased, while payments to natural persons based on travel expenses decreased.

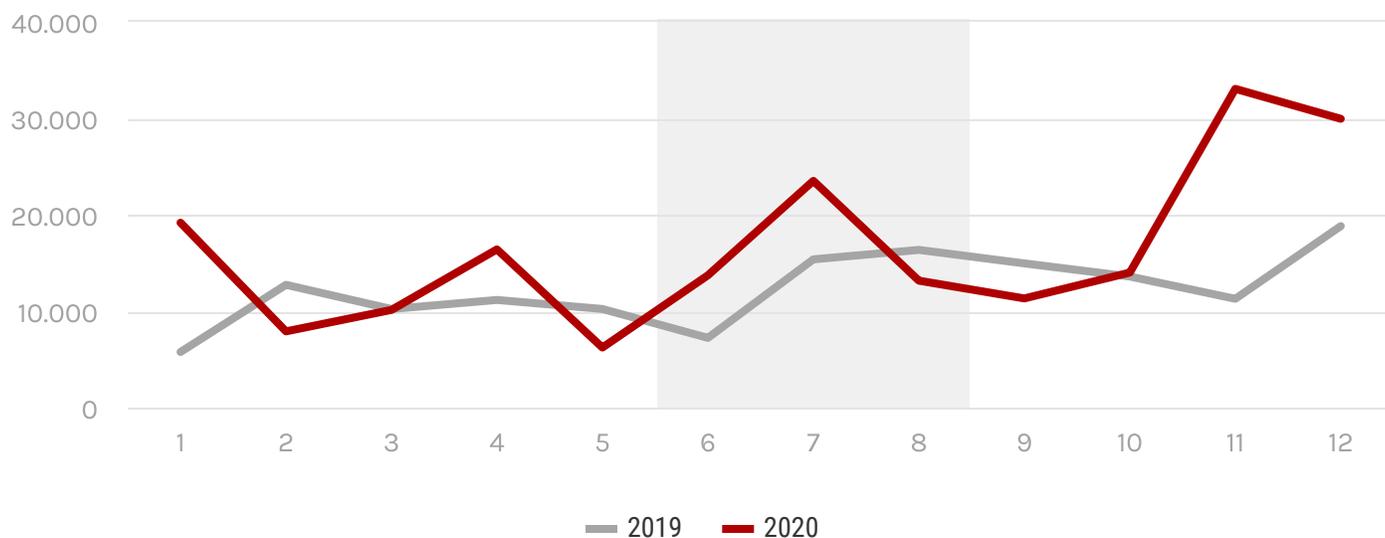
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



7.3.

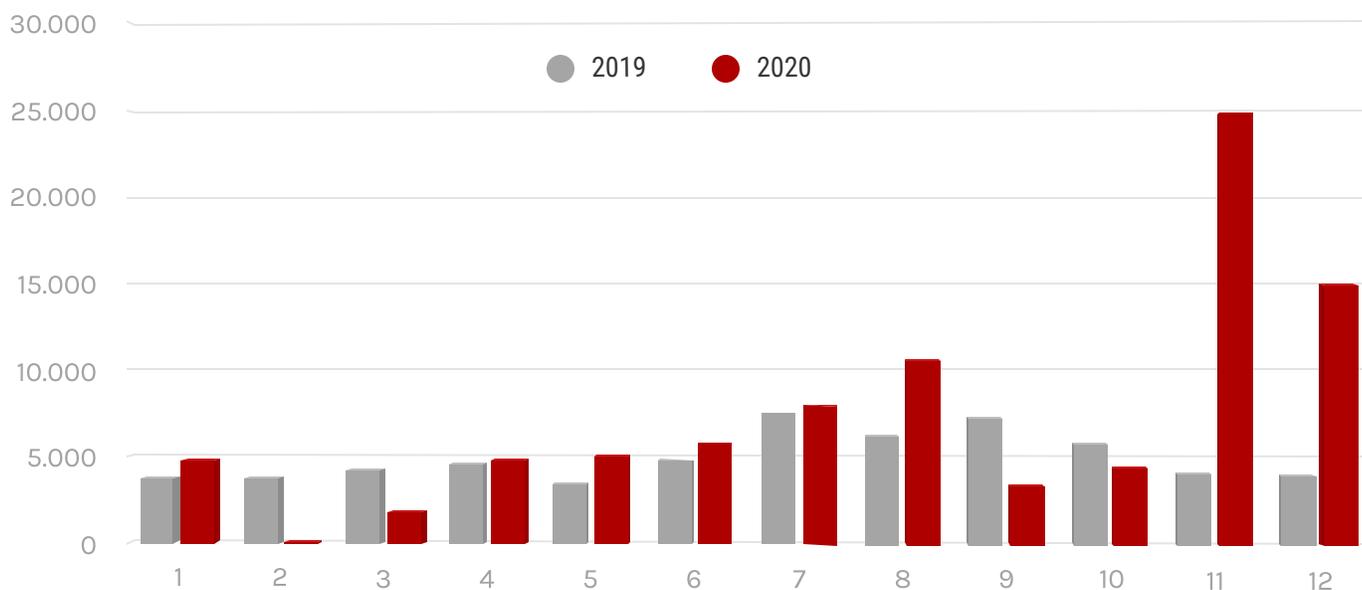
In June and July 2020, during the election campaign, there was an increase in payments to natural persons from the accounts for financing the regular operation of BS. The increase was noticeable in both November and December of that year.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



In August 2020, almost twice as much aid was paid from the account for the financing regular operation than in the same month of the previous year, and in July, three times as much as in the same period of 2019.

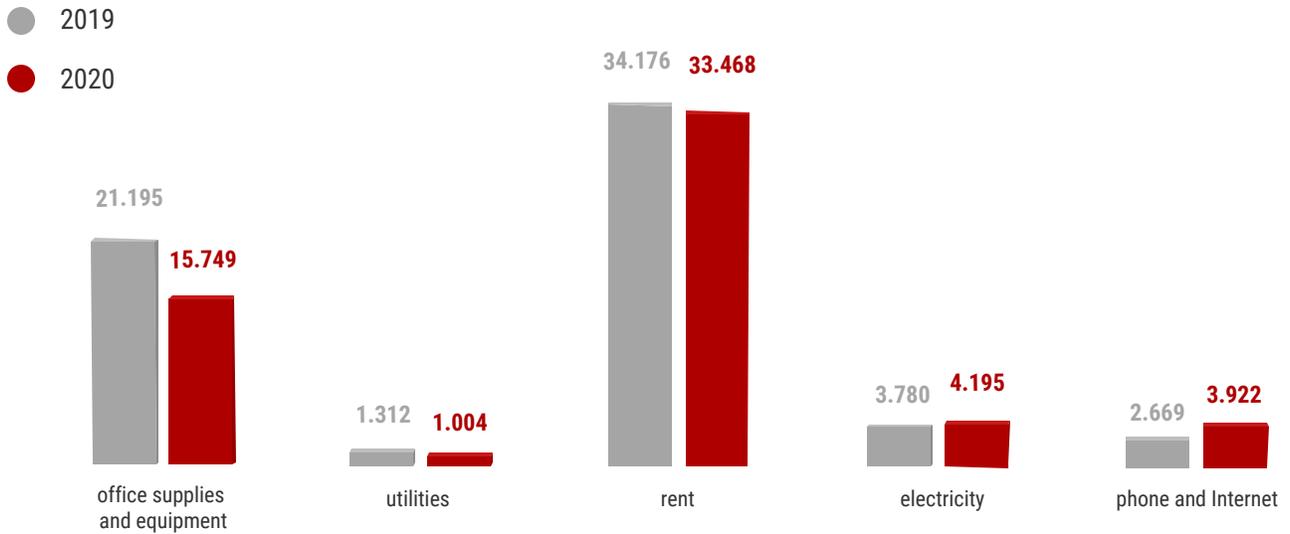
Expenses of aid to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



7.3.

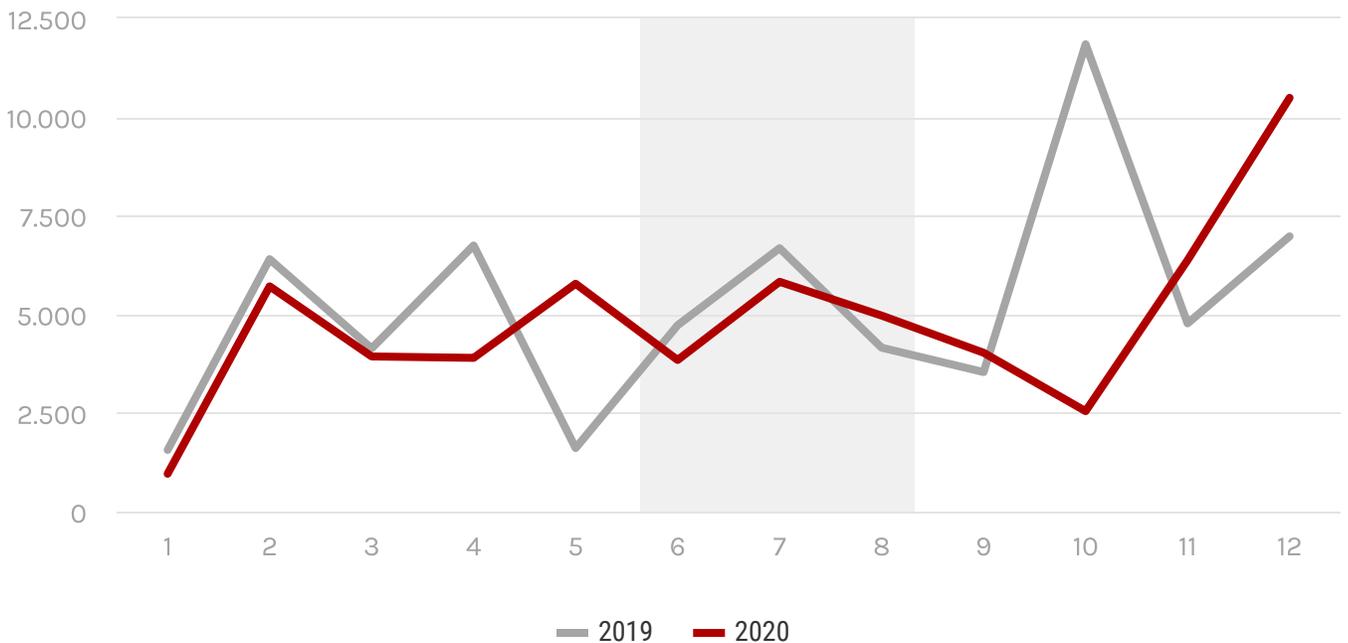
Office supplies, equipment and overhead. In 2020, the expenses of phone, internet and electricity, paid from the funds for regular operation, increased compared to the previous year.

Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by types (2019 and 2020)



However, there was no increase in these expenses during the election campaign, except for a slight increase in August.

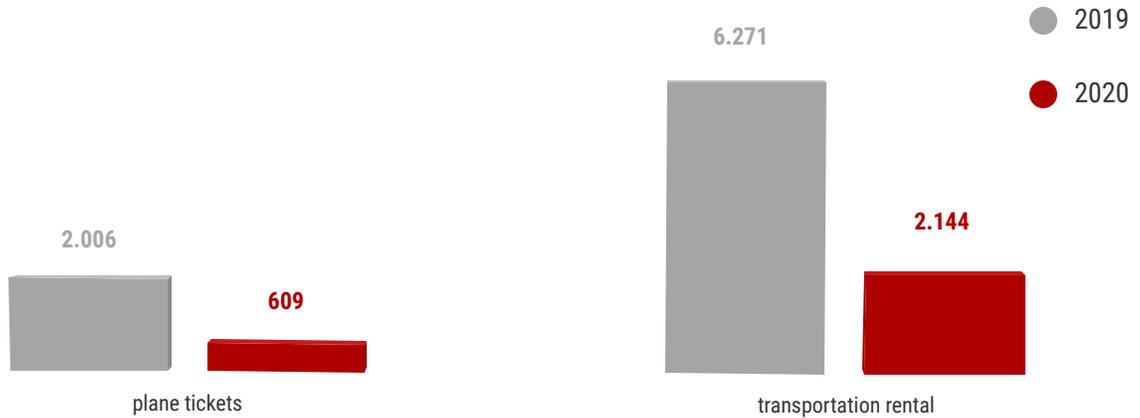
Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by months (2019 and 2020)



7.3.

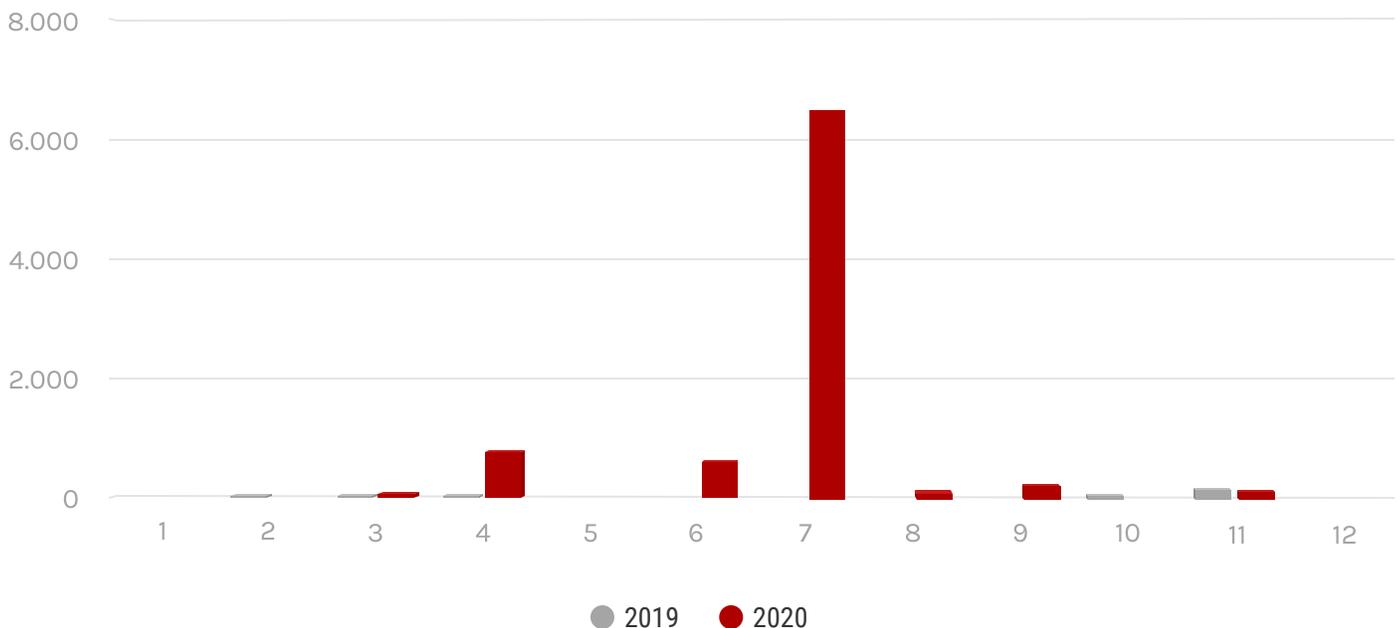
Transportation. Transportation expenses are lower in the election year than in the previous one, and it was same during the election campaign.

Transportation expenses from the funds for financing the regular operation, by types (2019 and 2020)



Promotional material. In July, during the election campaign, there was a greater increase in these expenses due to payments to the company Ninamedia kliping LLC of around six thousand euros.

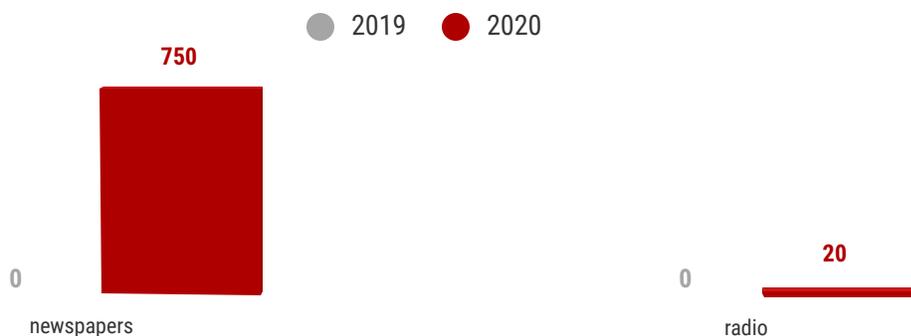
Expenses of promotional materials from the funds for financing the regular operation, by months (2019 and 2020)



7.3.

Advertising. In the election year, the expenses of advertising increased in July, but that amount is not significant and refers to the publication of advertisements in newspapers.

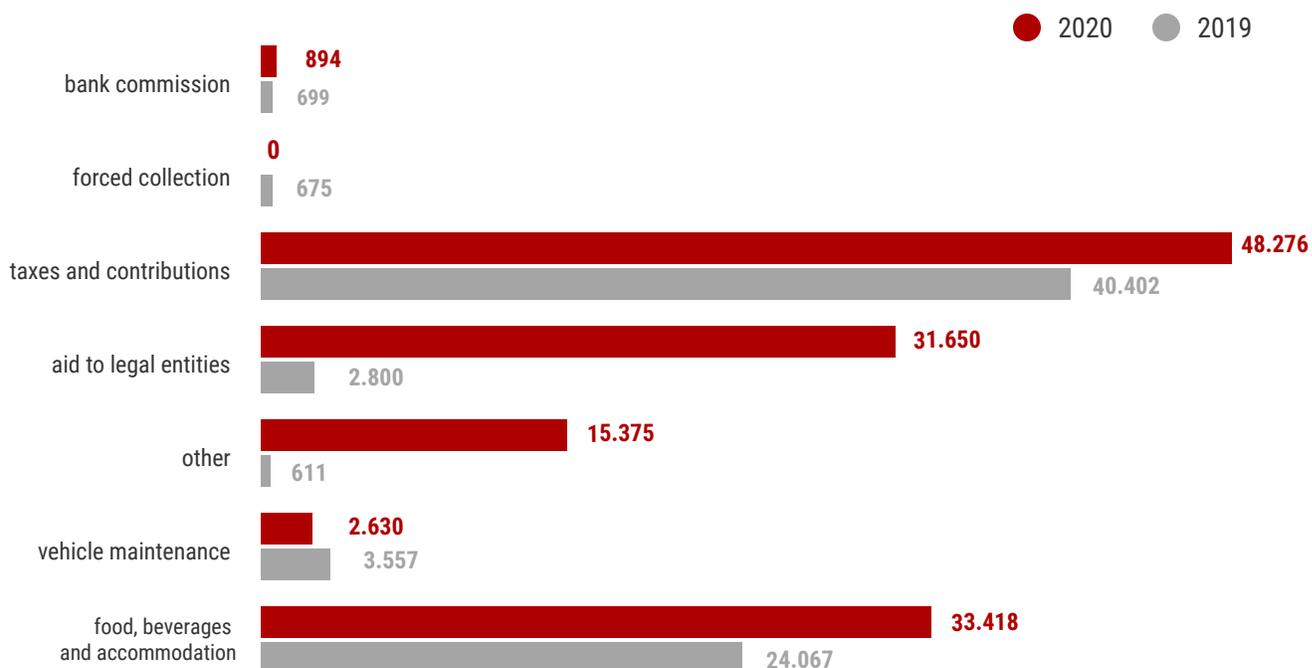
Advertising expenses from the funds for financing the regular operation, by types (2019 and 2020)



Other expenses. In 2020, the amounts of aid to legal entities increased the most, as well as the expenses of food and beverages, and there was also an increase in taxes and contributions related to higher payments of salaries and other payments to natural persons.

Aid to legal entities, mostly non-governmental organizations, was paid outside the election campaign, and the largest payment of eight thousand euros was to FK Rožaje at the end of 2020.

Other expenses from the funds for financing the regular operation, by types (2019 and 2020)

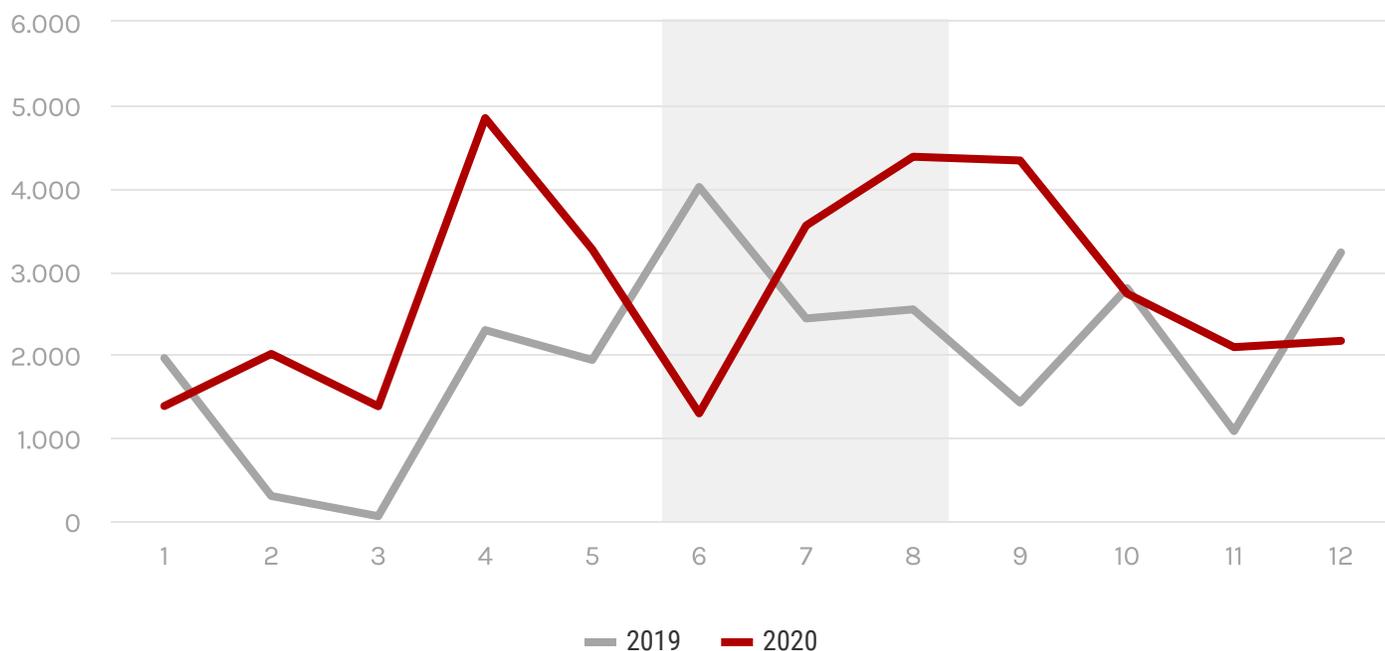


7.3.

It is interesting that in November 2020, after the election campaign, BS paid around 14.5 thousand euros to the company Montenegro Capital Investments LLC, which provides consulting services. The company's services are not reported as campaign expenses.

The expenses of food and drinks increased during the election campaign, while in August, the month when the elections were held, they are twice as high as in the same period of the previous year.

Expenses of food, beverages and accommodation from the funds for financing the regular operation, by months (2019 and 2020)



Cash money. In October 2020, around 1.5 thousand euros was withdrawn, which was paid for per diems, and there were no other operations through the treasury during 2020, as stated in the SAI reports. [86] BS claims that it did not have a treasury in 2019.

[86] Page 21 of the Report, <http://www.dri.co.me/1/doc/Izvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1taja%20Bo%C5%A1nja%C3%A8ke%20stranke%20za%202020.%20godinu.pdf>.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

According to the data we have, by the end of 2021, the expenses of the election campaign in the total amount of around eight thousand euros had not been paid from the bank account of BS.

Namely, the Bosniak Party submitted all statements from the accounts for 2020, while in 2021, there are six statements missing, two statements from one account of the head office and four statements from the account of the Women's Forum. [87]

The company Format studio LLC was not paid around 1,800 euros for the editing and processing of the recorded material, and around 1,300 euros to the company H&MK LLC from Rožaje, which runs catering business.

Companies Muminović LLC and Professional solutions have not been paid debts of around 1,000 euros each.

In the meantime, smaller amounts were paid to some of these suppliers, but they cannot be linked to the expenses incurred during the election campaign.

Over 1,100 euros of per diems reported as campaign expenses were also not paid from the election campaign account or from the treasury.

Around 1,800 euros was not paid to other, smaller suppliers, whose campaign bills amounted to a couple of hundreds euros each.

[87] We have not received the following statements in 2021: one in March, nine in April, four in May, three in October and one in November.

D.8.

Civic Movement United Reform Action (URA)

Civic Movement URA earned 725 thousand euros in two years, of which 640 thousand were paid from public sources.

That party is among highly transparent parties with an average score of 4.96.

URA increased the expenses of financing the regular operation during the election campaign compared to the same period of the previous year:



payments to natural persons doubled, most often on the basis of temporary employment contracts, and aid payments also increased,



over six times higher expenses of advertising on social media, Facebook especially,



the expenses of overhead doubled, especially rent and office supplies,



food and beverage expenses doubled.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from URA on inflows and outflows from 13 bank accounts during 2019 and 2020: two accounts of the head office, the Women's Forum account, account of the Municipal Board in Kotor, three election accounts - for parliamentary, and local elections in Budva and Kotor, three foreign currency accounts, as well as statements from three bank cards. We were also provided with data on expenses paid from the treasury of URA's head office.

Transparency scores of financial operations

Total transparency score [88] of the financing of URA is 4.96. The transparency score of the regular operation financing of that party is 4.95, while the transparency score of the election campaigns financing is 5.0.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	5.00	5.00	4.00
Head office	all statements submitted	all statements submitted	all statements submitted	submitted 100% of transactions in relation to SAI data
	complete data available for 100% of transactions	complete data available for 100% of transactions	complete data available for 100% of transactions	cash withdrawal from the account coincides with 94% of the cash inflow
Women's Forum	5.00	-	-	-
	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Municipal boards	5.00	-	-	0.00
	all statements of 1 municipal board submitted	no	no	treasury of Municipal Board in Kotor (SAI 2019) was not submitted, the amount is not specified, the score is calculated according to the same ratio as for the head office
	complete data available for 100% of transactions	-	-	-
Transparency score of the regular operation financing				4.95

[88] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	5.00	-	-	-
	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Kotor	5.00	-	-	-
	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Budva	5.00	-	-	-
	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Tivat	<i>did not participate</i>	-	-	-
Tuzi	<i>did not participate</i>	-	-	-
Andrijevisa	<i>did not participate</i>	-	-	-
Gusinje	<i>did not participate</i>	-	-	-
Transparency score of the election campaigns financing				5.00

Total transparency score of the party financing

4.96

What is missing?

Information on expenses from the treasury of the Municipal Board in Kotor, which was active during 2020 according to the audit reports of the State Audit Institution [89], was not provided to us.

[89] Audit Report of Consolidated Annual Financial Statement of Civic Movement URA for 2020, [http://www.dri.co.me/1/doc/lzvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20izvje%C5%A1tja%20Gra%C4%91anskog%20pokreta%20za%202020.%20godinu.pdf](http://www.dri.co.me/1/doc/lzvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20izvje%C5%A1tja%20Gra%C4%91anskog%20pokreta%20URA%20za%202020.%20godinu.pdf); Audit Report of Consolidated Annual Financial Statement of Civic Movement URA for 2019, <http://www.dri.co.me/1/doc/lzvje%C5%A1taj%20o%20reviziji%20Godi%C5%A1njeg%20konsolidovanog%20finansijskog%20izvje%C5%A1tja%20Gra%C4%91anskog%20pokreta%20E2%80%9CURA%E2%80%9C%20za%202019.%20godinu.pdf>.

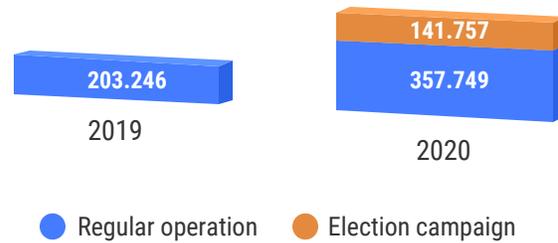
ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

The documentation published by URA shows that its total revenues in 2019 were **around 200 thousand euros**.

In 2020, the revenues on the published accounts for financing the regular operation were **nearly 360 thousand**, and around 140 thousand euros was paid for the election campaign.

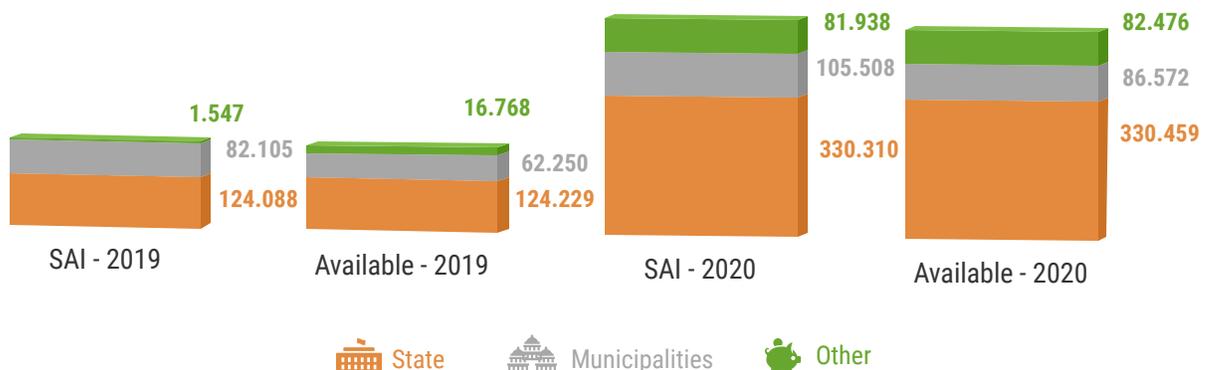
Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with auditor's data

SAI reports show that URA received around 20 thousand euros more funds per year from the local self-governments budgets than the data provided to MANS show. This is probably calculated but uncollected revenues, although this is not specified in the audit reports.

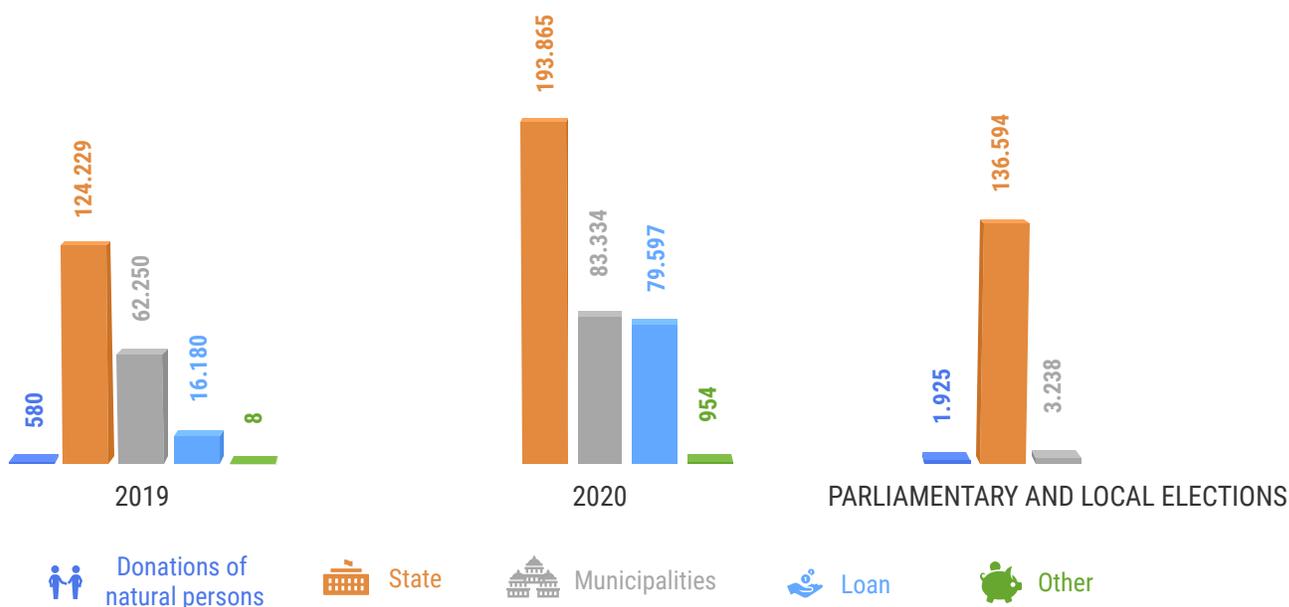
Comparison of SAI data on total revenues with available information from available accounts in 2019 and 2020



Revenue sources

Most of the available revenues relate to payments by the state and local self-governments. In 2019, a smaller loan was taken, as well as a larger loan in 2020, which were paid into the account for financing the regular operation of URA. Funds received from the loan in the election year were transferred to the account for campaign financing.

Revenue sources in 2019 and 2020



Financial documentation shows that URA took a loan of 80 thousand euros, which was paid into the account for regular operation on July 29, 2020, and then transferred 61 thousand to the account for the parliamentary elections, 20 thousand a day after receiving the loan, additional 20 thousand on August 11, and 21,000 on August 24. In addition, on August 11, 10,000 was paid into the accounts for financing the local elections campaign for the elections in Budva, and 8,000 for the elections in Kotor.

SAI report [90] states that the loan was taken to finance the election campaign and should have been paid into a separate account:

“Insight into the Loan Agreement determined that the loan was taken for the preparation of the election campaign (parliamentary and local elections in Budva and Kotor), thus, in accordance with the purpose of the loan, the funds had to be paid into a separate bank account opened for the election campaign purposes, pursuant to Article 24, paragraph 3 of the Law, which stipulates that all funds intended for the financing of the election campaign shall be paid into a separate account intended for the financing of election campaign expenses.”

[90] Audit Report of Consolidated Annual Financial Statement of the “Civic Movement URA” for 2020, page 6.

8.2.

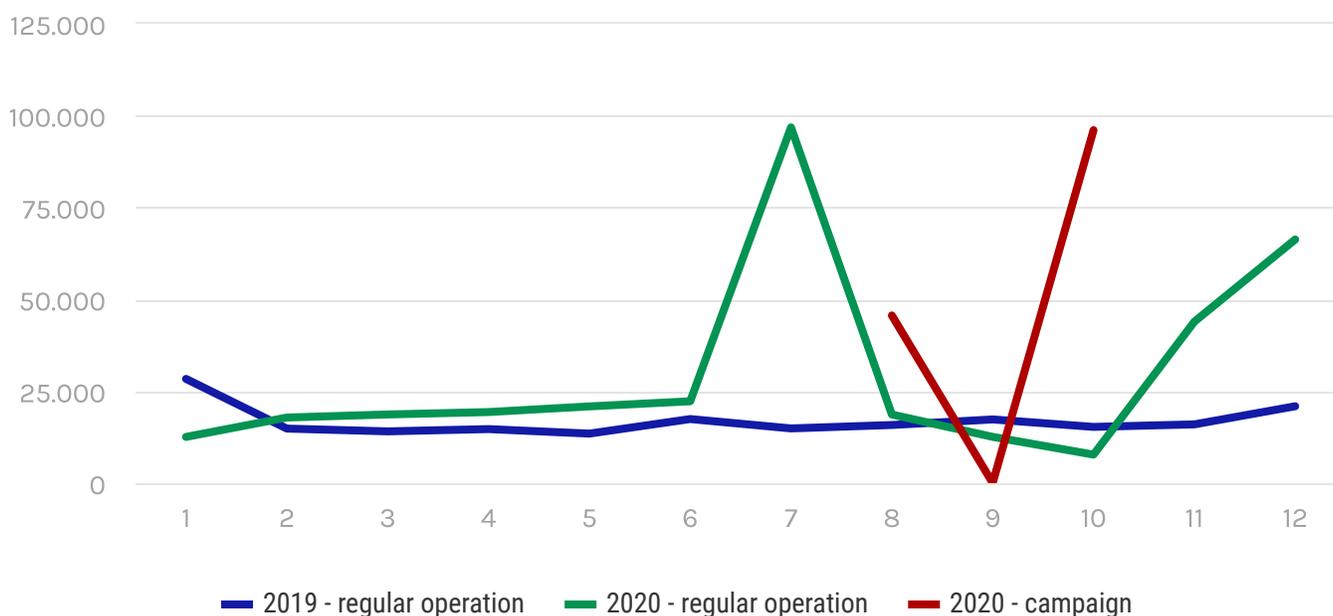
The audit determined that the funds were paid into the account for regular operation. Insight into the Loan Agreement determined that the loan was taken for the preparation of the election campaign (parliamentary and local elections in Budva and Kotor), thus, in accordance with the purpose of the loan, funds should be paid into a separate bank account opened for the election campaign purposes, in accordance with Article 24 paragraph 3 of the Law, which stipulates that all funds intended for the financing of the election campaign shall be paid into a separate account intended for the financing of election campaign expenses.

Average monthly revenues and payment dynamics

During 2019 and in the first half of 2020, average monthly revenues of URA were stable and amounted to around 17 thousand euros. In July 2020, revenues increased due to taking out a loan to finance the regular operation. A smaller increase in December 2020 also refers to increased payments from the state treasury.

In August 2020, the state paid them the first part, and in October, the second part of the funds for financing the election campaign to a separate account.

All available revenues by months (2019 and 2020)



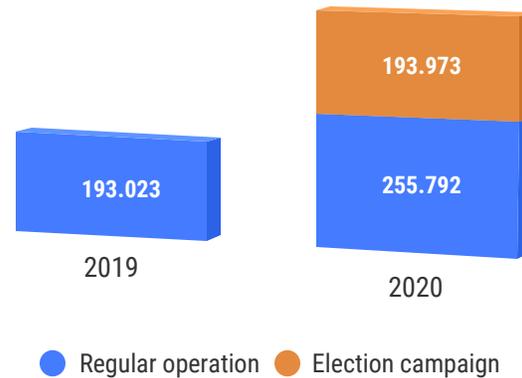
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

According to available bank account statements and accounts from the treasury, in 2019, the expenses of regular operation of URA amounted to **over 190 thousand**, and **around 255 thousand euros** in 2020.

The available expenses of the parliamentary and local elections were over 190,000 euros.

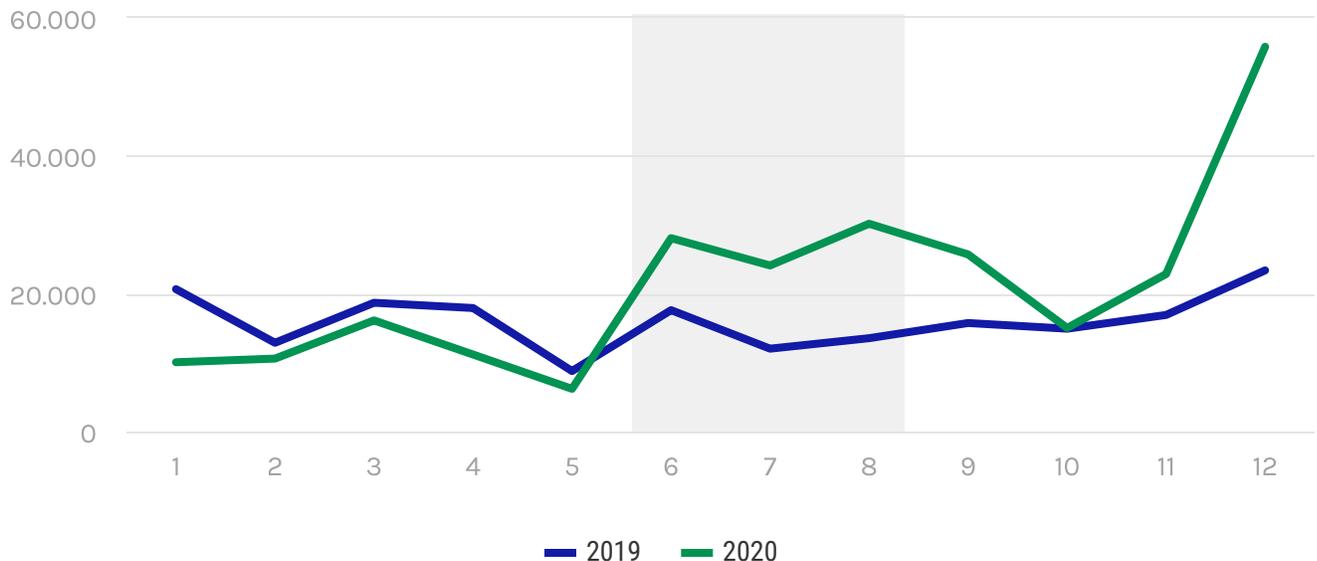
Available expenses of regular operation and election campaigns (2019 and 2020)



Monthly expenses

During the election campaign, in June, July and August 2020, URA had higher expenses of financing the regular operation compared to the same period of the previous year. The expenses of regular operation are higher in September of that year as well, after the elections, then fell sharply in October, and then increased again in November and December.

Expenses of financing the regular operation, by months (2019 and 2020)

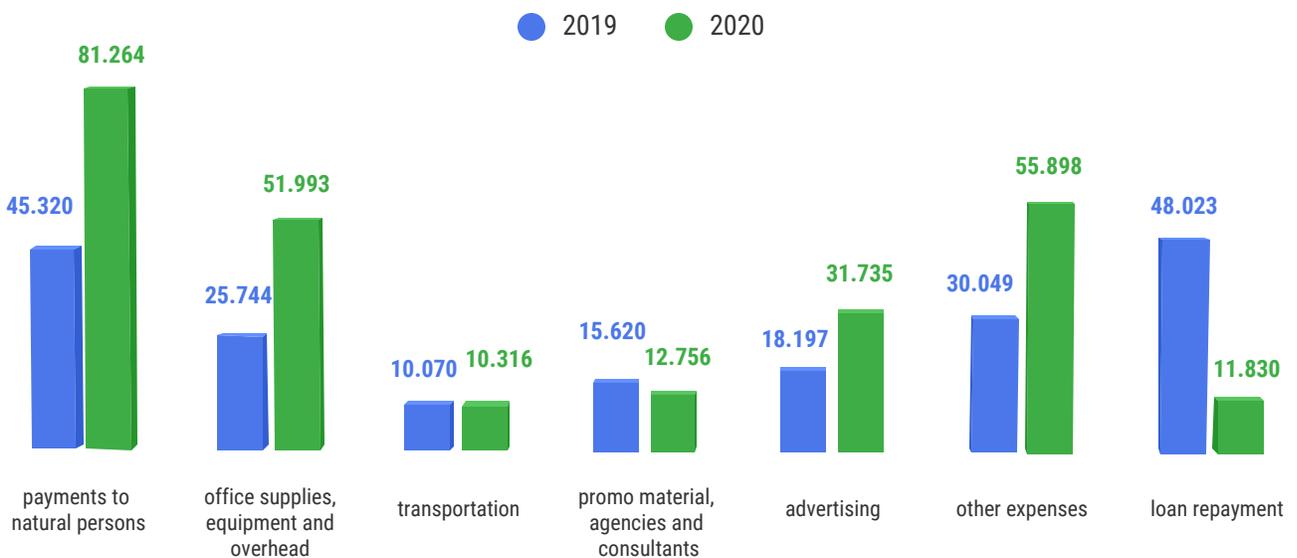


8.3.

Which expenses of regular operation increased in the election year and during the election campaign?

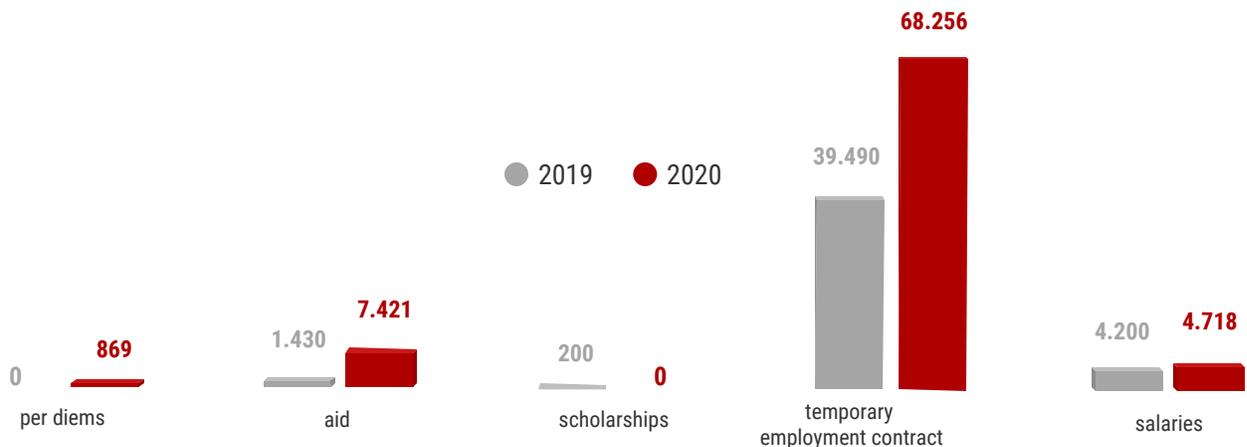
The highest expenses of financing the regular operation, payments to natural persons, are nearly twice as high in the election year compared to the previous one. In the election year, the expenses of office supplies, equipment and overhead are twice as high, the expenses of advertising doubled, as well as other expenses of financing the regular operation of URA.

Expenses of the regular operation, by categories (2019 and 2020)



Payments to natural persons. These payments increased predominantly due to higher expenses based on **temporary employment contracts**, while the payment of aid to natural persons also increased.

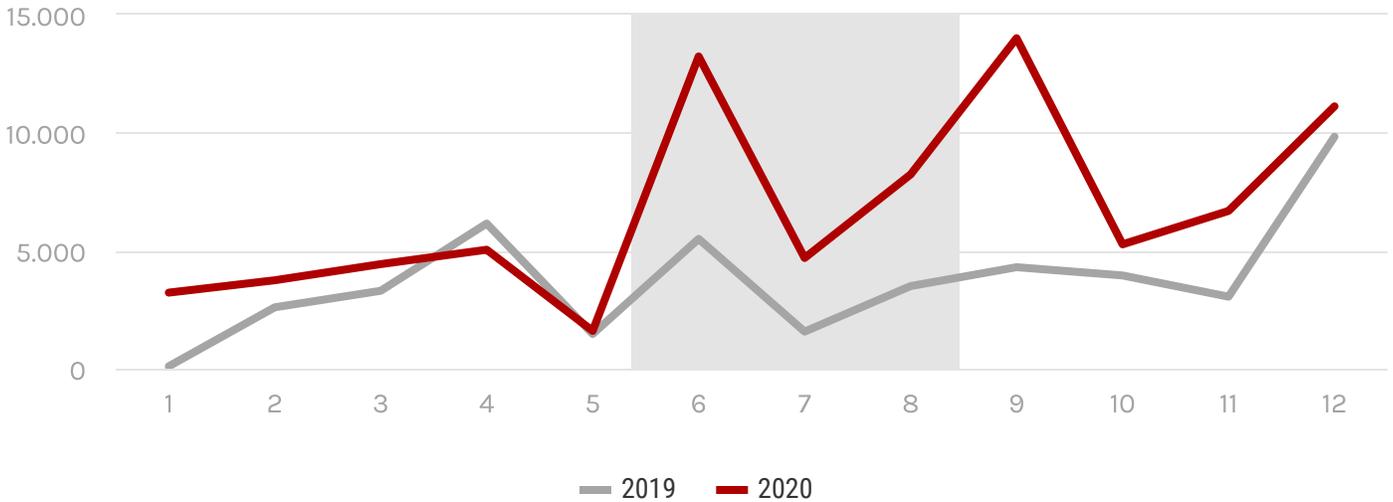
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



8.3.

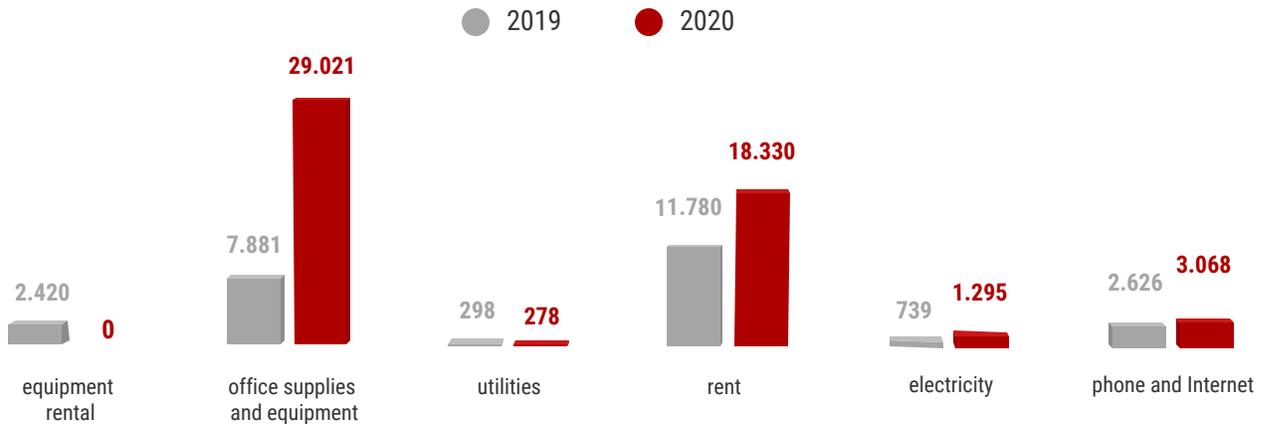
There has been a large increase in payments to natural persons since June 2020, while in July and August, and then in October and November, twice as many funds was paid on this basis than in the same period of the previous year.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. In the election year, the expenses of office supplies and equipment increased several times, as well as the rent expenses.

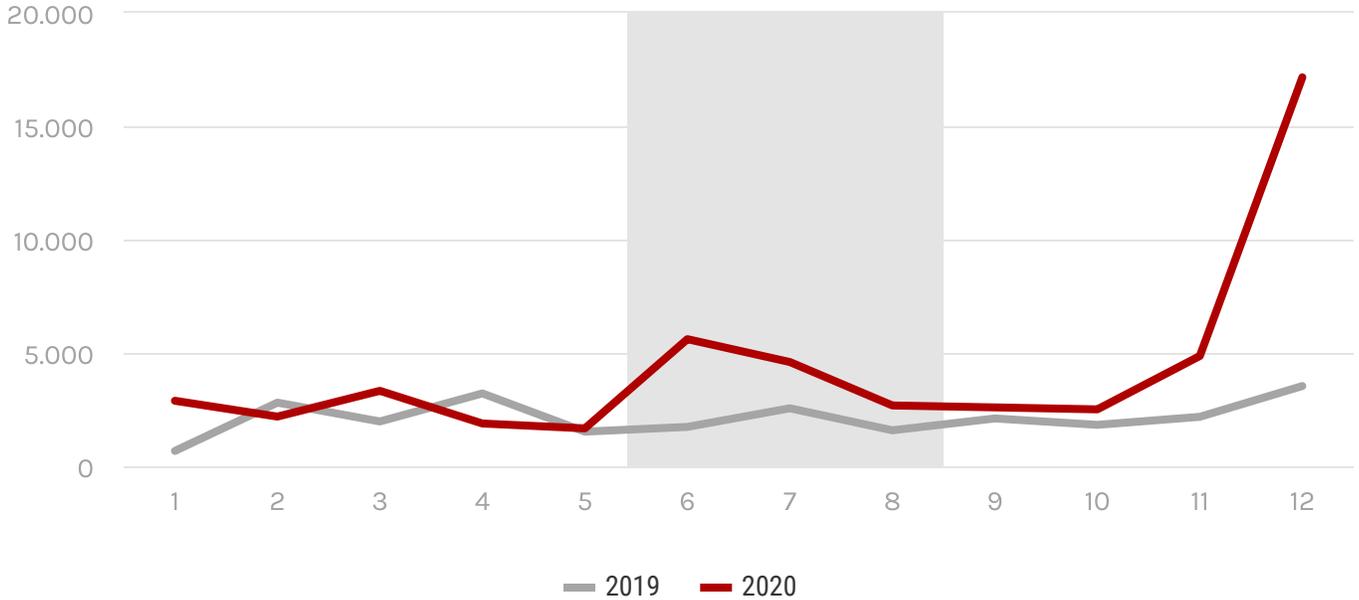
Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by types (2019 and 2020)



These expenses increased during the election campaign. In June 2020, the increase in expenses was mostly due to higher payments to natural persons on the basis of rent. In July and August, in addition to the increase in rent expenses paid to natural persons, the purchase of office supplies also increased. The increase in these expenses at the end of the year was due to the purchase of vehicles.

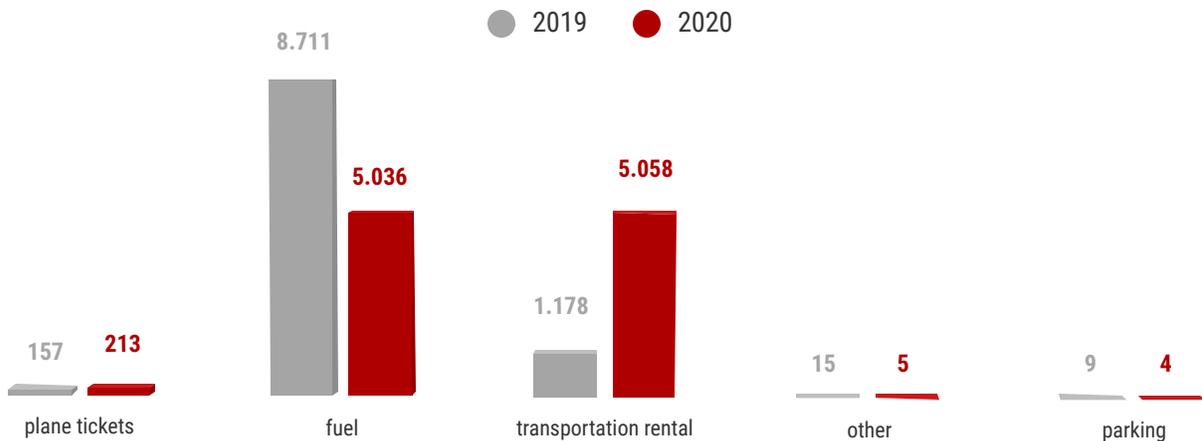
8.3.

Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by months (2019 and 2020)



Transportation. In the election year, all transportation expenses are lower than in the previous year, and there was no increase during the election campaign.

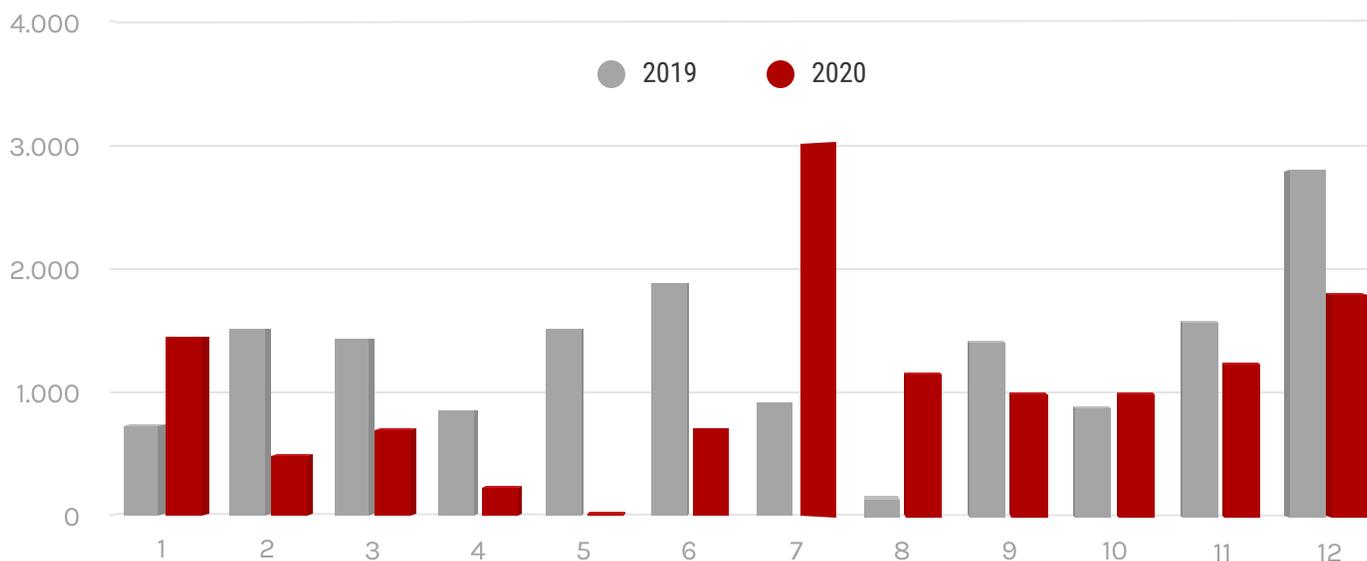
Transportation expenses from funds for financing the regular operation, by types (2019 and 2020)



Promotional material. Total funds spent on promotional material are less in the election year than in the previous year. However, the expenses of promotional material in July and August 2020 are over four times higher than in the same months of the previous year. These are payments to companies that make promotional material.

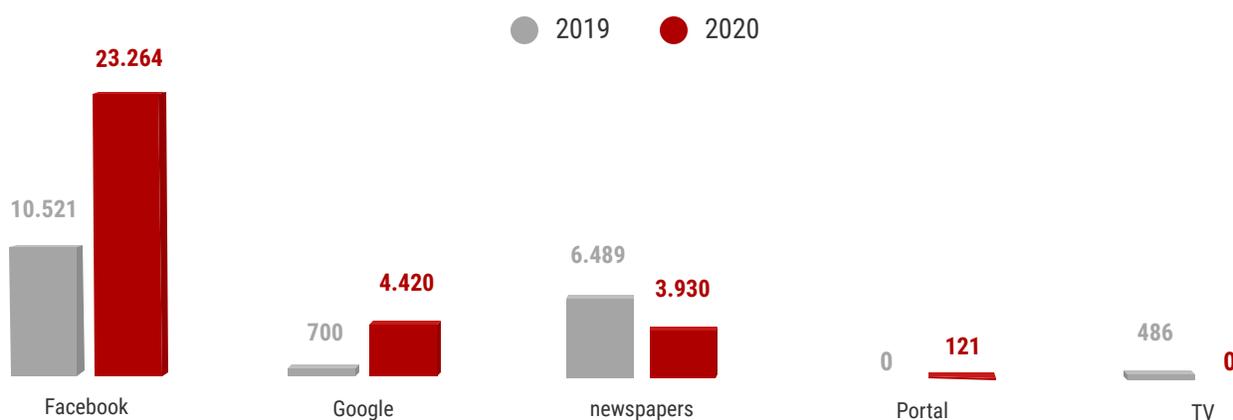
8.3.

Expenses of promotional material from funds for financing regular operation, by months (2019 and 2020)



Advertising. In the election year, advertising expenses paid from the account for regular financing increased due to higher advertising expenses on social media, especially Facebook and Google.

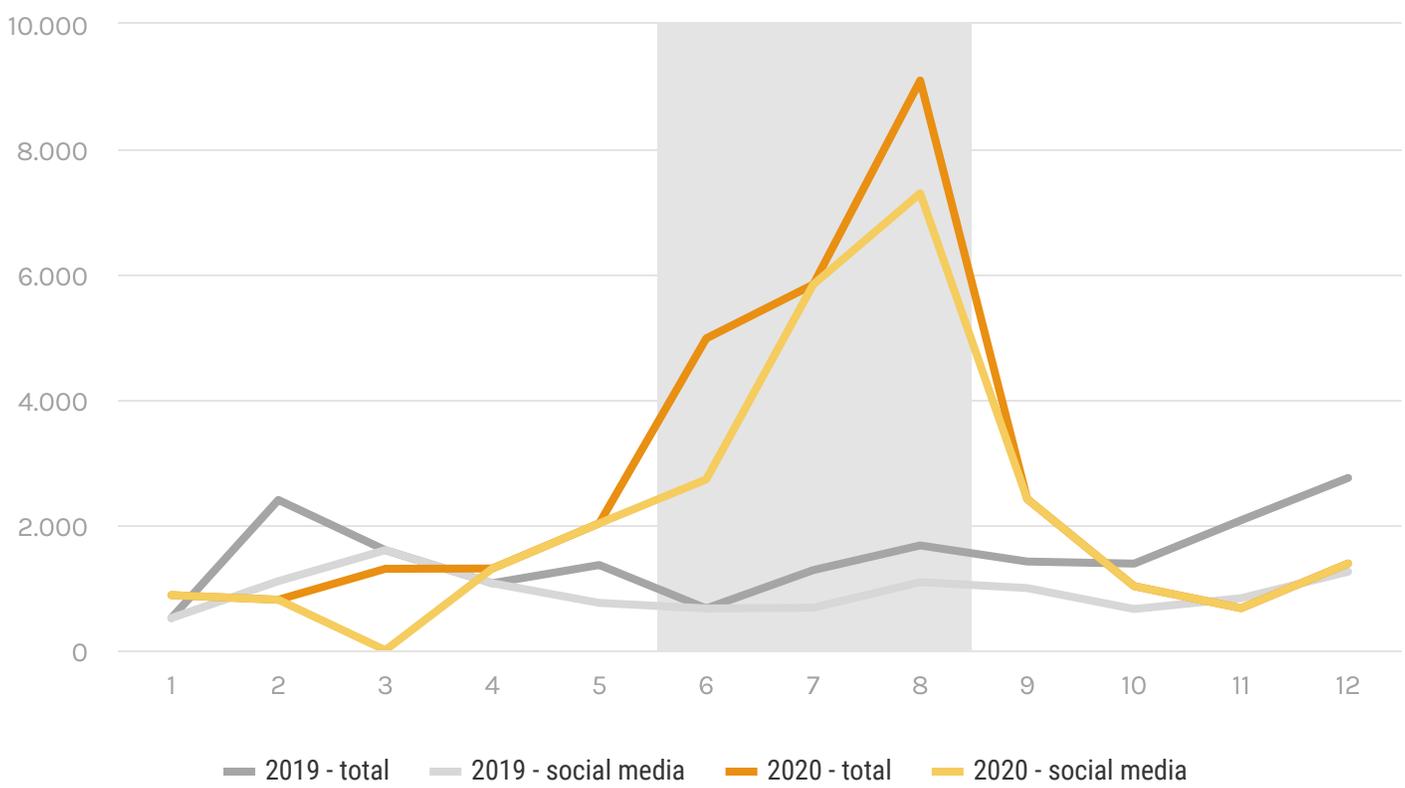
Advertising expenses from the funds for financing the regular operation, by types (2019 and 2020)



Sharp increase in advertising expenses began in June 2020 and lasted until the end of the election campaign. The increase in expenses was due to increased payments to Facebook, Google and the newspaper Vijesti. While the expenses of advertising on social networks were 15.8 thousand euros from June to the end of August 2020, in the same period of 2019, 2.4 thousand euros was spent for these purposes.

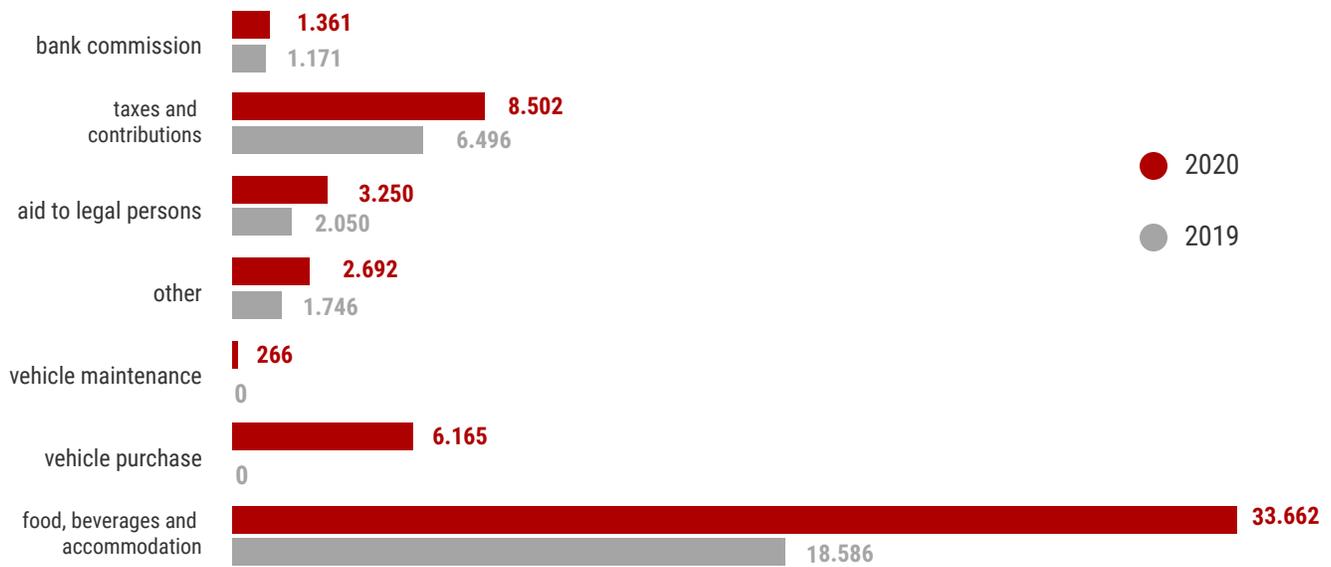
8.3.

Advertising expenses from funds for financing the regular operation, by months (2019 and 2020)



Other expenses. In the election year, the expenses of food, beverages and accommodation paid from the account for financing the regular operation of the party increased significantly.

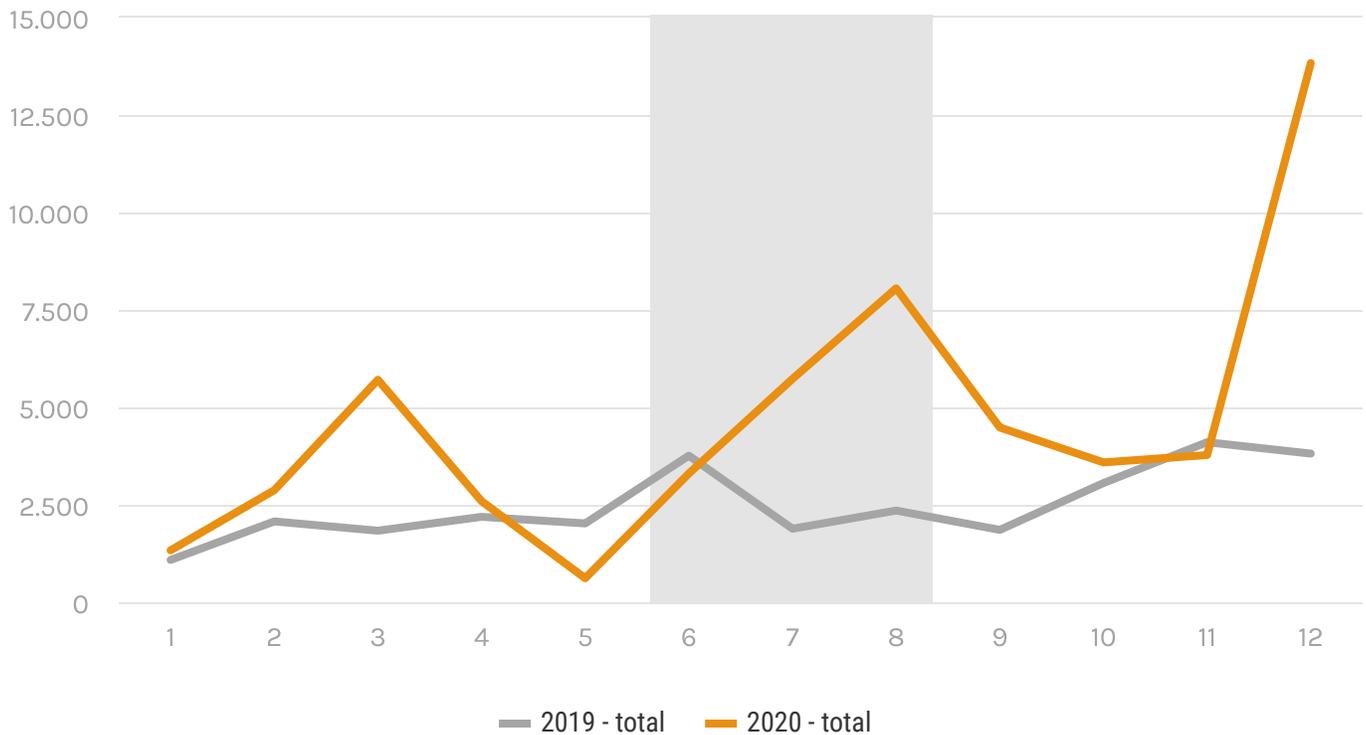
Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



8.3.

Other expenses are twice as high in July and August 2020 than in the same period of 2019, mainly due to increased spending on food, beverages and accommodation.

Other expenses from the funds for financing the regular operation, by months (2019 and 2020)



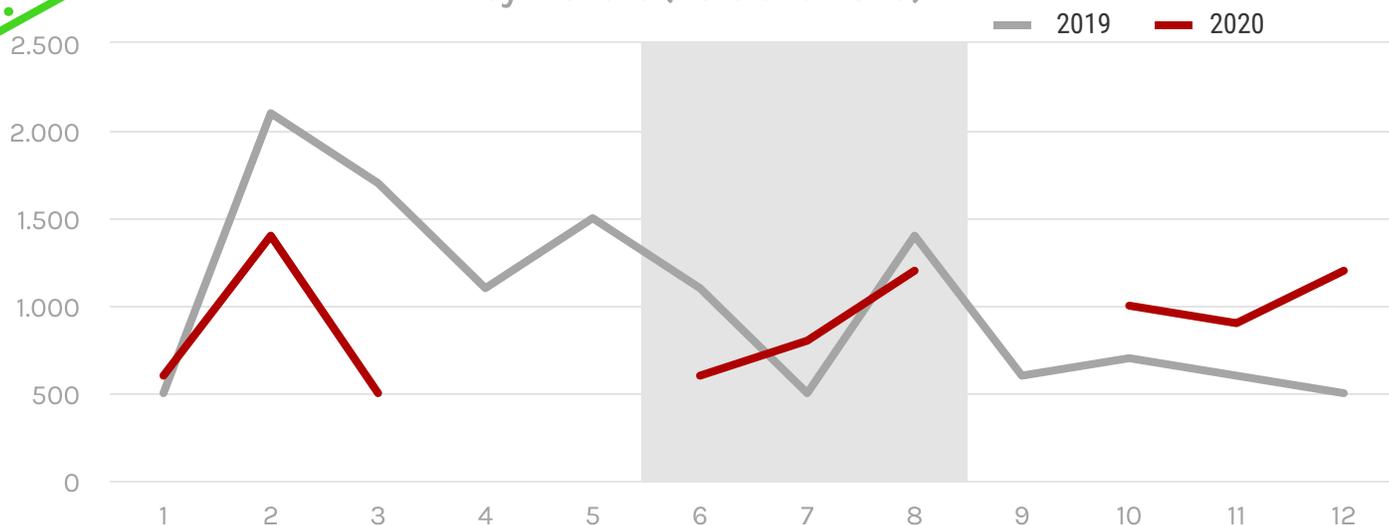
During the election campaign, payments of taxes and contributions were somewhat higher. In 2020, more aid was paid to legal entities, but those payments were not made during the election campaign.

Cash Money. URA had higher expenses through the treasury of the head office in 2019 than in 2020. In August, the month when the elections were held, there was a sharp increase in spending from the treasury. However, these amounts are not significant.

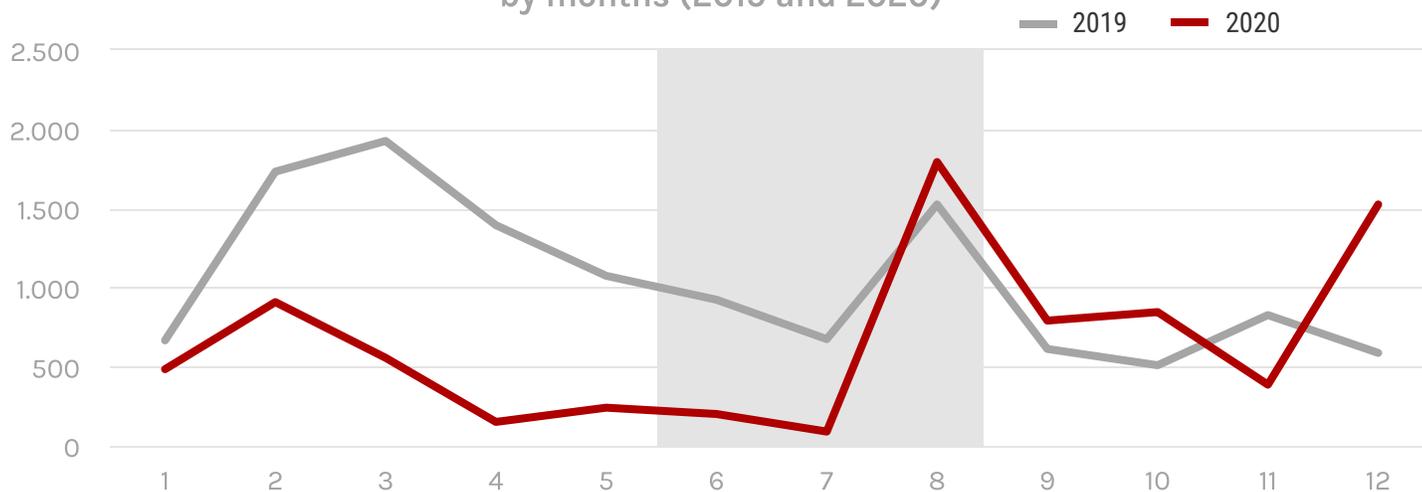
Let us note that the treasury of the Municipal Board in Kotor was not available to us, for which the SAI states it existed in 2019.

8.3.

Dynamics of cash withdrawal from the funds for financing the regular operation, by months (2019 and 2020)



Dynamics of cash consumption from the funds for financing the regular operation, by months (2019 and 2020)



8.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

By the end of 2020, all reported campaign expenses for the parliamentary elections had been paid from a separate bank account of URA.

D.9.

Movement for Changes (PZP)

The Movement for Changes officially earned around 710 thousand euros in the last two years, and received as much as 680 thousand from the state or municipal budgets.

Although PZP receives over 95% of its budget from public sources, the party is very non-transparent and has an average score of 0.

PZP did not publish any data on its finances based on the requests for information MANS had submitted to them, and important data are also missing in their financial statements.

In the election year, the expenses of this party increased by over 30%, but from the very brief financial statements, it is not possible to conclude on what basis the increase occurred.

According to PZP's financial statements, they did not have any election campaign expenses in 2020, although they took over debts worth over 80,000 euros from the New Serb Democracy, which arose on that basis.

9.1.

TRANSPARENCY OF FINANCIAL OPERATIONS

We submitted 55 requests for information to PZP and asked for data on their finances in 2019 and 2020, but that party did not respond to any of our requests.

We have filed appeals in all 55 cases, and decisions were adopted in 42 cases, and each of them instructed the PZP to act on our request. That party, however, still has not responded to our requests.

Only the mandatory consolidated financial statements for 2019 and 2020, as well as the audit report for 2019 are available to the public.

Total transparency score of the party financing

0.00

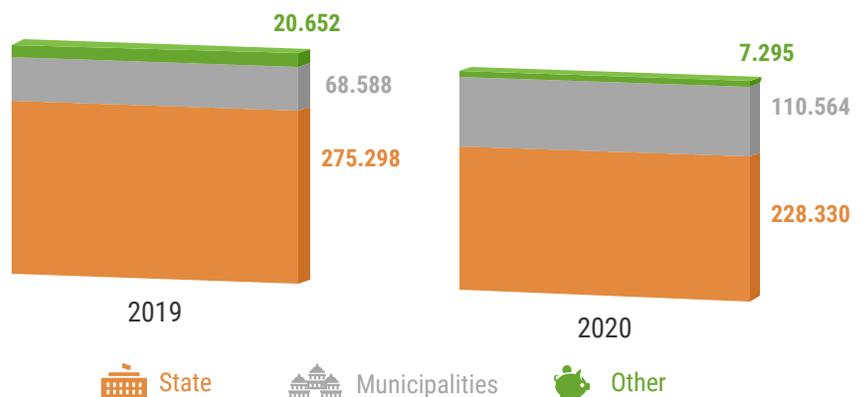
9.2.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total PZP's revenues reported in the financial statements were **over 360 thousand euros** in 2019 and **over 340 thousand** in 2020.

Official sources of funding in 2019 and 2020



Revenue sources

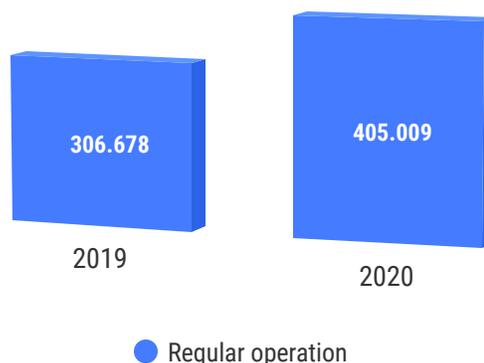
Practically the only source of funding for PZP are public funds, predominantly from the state budget, but also from municipal budgets.

ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

In 2019, PZP had **around 300 thousand euros** in total expenses [91], and **around 400 thousand** in 2020, while that party states in its financial statements that it had no election campaign expenses.

Official expenses of the regular operation and election campaigns (2019 and 2020)



Which expenses of regular operation increased in the election year?

The financial statements show that in the election year, there was an **increase in other operating expenses of PZP from around 130 to nearly 220 thousand euros**, but there is no more detailed information.

Namely, in addition to the balance sheet and income statement, political parties have the obligation to fill out special forms in which they give a somewhat more detailed overview of expenses. PZP submitted **identical forms for 2019 and 2020**, although the information they provided in the balance sheet and income statement differs.

[91] These data do not include depreciation costs reported in the financial statements.

9.3.

Obrazac TNPUZI

Troškovi nastali prilikom uzimanja u zakup pokretne imovine		
Vrsta pokretne imovine	Period uzimanja u zakup	Trošak zakupa pokretne imovine (u €)
Ukupno:		

Obrazac TNPUZI

Troškovi nastali prilikom uzimanja u zakup pokretne imovine		
Vrsta pokretne imovine	Period uzimanja u zakup	Trošak zakupa pokretne imovine (u €)
Ukupno:		

Obrazac TNPKPI

Troškovi nastali pri korišćenju pokretne imovine			
Vrsta pokretne imovine (u €)	Troškovi re dovnog odrz	Ostali troškovi (u €)	Ukupno (u €)
Trošk.reklame i propagande			12.353,79
Trošk.fiksne i mobilne telefonije			11.308,09
Trošk.reprezentacije			25.399,84
Trošk.elekt.energije i goriva			57.626,80
Trošk.osiguranja vozila			
Trošk.iz ranijeg perioda			92.226,70
Trošk.intelektualnih usluga			
Trošk.kamata			
Trošk.neproizvodnih usluga			3.182,76
Ostali nematerijalni troškovi			6.853,06
Ukupno:			268.464,52

Obrazac TNPKPI

Troškovi nastali pri korišćenju pokretne imovine			
Vrsta pokretne imovine (u €)	Troškovi re dovnog odrz	Ostali troškovi (u €)	Ukupno (u €)
Trošk.reklame i propagande			12.353,79
Trošk.fiksne i mobilne telefonije			11.308,09
Trošk.reprezentacije			25.399,84
Trošk.elekt.energije i goriva			57.626,80
Trošk.osiguranja vozila			
Trošk.iz ranijeg perioda			92.226,70
Trošk.intelektualnih usluga			
Trošk.kamata			
Trošk.neproizvodnih usluga			3.182,76
Ostali nematerijalni troškovi			6.853,06
Ukupno:			268.464,52

Napomena: S obzirom da nema tabele za ove rashode (troškove), upisani su u tabeli "troškovi nastali pri korišćenju pokretne imovine" (obrazac TNPKPI).

Napomena: S obzirom da nema tabele za ove rashode (troškove), upisani su u tabeli "troškovi nastali pri korišćenju pokretne imovine" obrazac TNPKPI)

Obrazac TNOFIK

Troškovi nastali po osnovu finansiranja izborne kampanje		
Izborna kampanja	Period održavanja	Ukupno (u €)
Ukupno:		

Obrazac TNOFIK

Troškovi nastali po osnovu finansiranja izborne kampanje		
Izborna kampanja	Period održavanja	Ukupno (u €)
Ukupno:		

Obrazac TNOLZ

Troškovi nastali po osnovu isplate zarada i ostalih naknada				
Obaveze po osnovu zarada	Obaveze po osnovu autorskih honorara	Obaveze po osnovu ugovora o djelu	Ostale naknade	Ukupno (u €)
45.632,36		51.739,92	65.070,47	162.442,75
Ukupno:				162.442,75

Obrazac TNOLZ

Troškovi nastali po osnovu isplate zarada i ostalih naknada				
Obaveze po osnovu zarada	Obaveze po osnovu autorskih honorara	Obaveze po osnovu ugovora o djelu	Ostale naknade	Ukupno (u €)
45.632,36		51.739,92	65.070,47	162.442,75
Ukupno:				162.442,75

Photo 21: Excerpt from the PZP's financial statement for 2019, page 10

Photo 22: Excerpt from the PZP's financial statement for 2020, page 23

It is not known whether PZP paid 81,000 euros in election campaign expenses incurred by the party under a protocol signed by the members of the coalition "For the Future of Montenegro". [92]

[92] More detailed information in Chapter D.3. New Serb Democracy (NOVA).

Подгорица
21.10.2020. године

УРЕ
21.10.20

ДЕМОКРАТСКА НАРОДНА ПАРТИЈА
ЦРНЕ ГОРЕ
Број 689/20
Подгорица 21.10.2020. год.

ПРОТОКОЛ О СРАВЊЕЊУ

ЧЛАН 1

Овим Протоколом се дефинише испуњење заједничких обавеза, између конституената Коалиције ЗА БУДУЋНОСТ ЦРНЕ ГОРЕ, Нове српске демократије, Покрета за промјене и Демократске народне партије, Социјалистичке народне партије, Праве Црне Горе, Уједињене Црне Горе и Радничке партије насталих као заједнички трошкови поводом изборне кампање и накнадне услуге рекламе "ХВАЛА ТИ ЦРНА ГОРО" (15.000,00€) ових политичких субјеката

ЧЛАН 2

Потписници овог Протокола се обавезују да предметне обавезе, КОЈЕ ИЗНОСЕ 434.555,64 измире на следећи начин:

НСД		
	PINK MEDIA M	81.513,29
	LIMANAKI STUDIO	50.000,00
	DRUSTVO ZA RAVNOPRAVNOST	15.322,50
	УКУПНО	146.835,79

ПЗП		
	PINK MEDIA M	81.575,44
	УКУПНО	81.575,44

Photo 23: Excerpt from the Protocol on the settlement of liabilities between the constituents of the coalition "For the Future of Montenegro"

According to financial statements, the party did not have election campaign expenses in 2020, but the forms are identical to those for 2019.

SAI audited the financial statements of PZP only for 2019. It shows that the party paid the election campaign expenses from previous years, based on three protocols concluded by the constituents of the Democratic Front in 2017 and 2018. [93] In addition, the audit found that PZP paid some expenses of the New Serb Democracy, in accordance with the agreements of the debt settlement, which did not define the basis for the settlement. [94]

SAI did not audit PZP's finances for 2020.

[93] Final Audit Report on Annual Financial Statement of the Movement for Changes for 2019, page 4.

[94] Ibid, page 7.

D.10.

Democratic People's Party (DNP)

In two years, Democratic People's Party officially earned around 640 thousand euros, of which as much as 620 thousand from the state.

This party is among the parties with lower transparency, with an average score of 3.1.

DNP did not provide us with data on part of the revenues and expenses from 2019, and in the State Audit Institution did not audit their consolidated reports for those two years, which limits the analysis of that party's financing.

During the election campaign, DNP



had significantly higher accommodation expenses compared to other months,



increased the rent expenses paid to natural persons.

That party took over the payment of over 80 thousand euros of debt for election marketing to Pink Media M, and in the data it provided us, there is no evidence that they paid that debt by the end of May 2022.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, MANS received data from DNP on inflows and outflows from two accounts of the head office in 2020, and from one account in the first eight months of 2019. We were also provided with data on spending from the foreign currency account and the business card of the party's head office, as well as information on the spending of the Women's Forum, but only for 2020.

Transparency scores of financial operations

Total transparency score [95] of financing of DNP is 3.1. It is also a transparency score of the financing of the party's regular operation, while there is no transparency score of election campaigns financing because the party has not managed the funds for financing any election campaign during the observed two years.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	3.00	2.00	2.00	0.00
Head office	data submitted for the first eight months of 2019 from one head office account; for 2020, data submitted for two head office accounts, but several statements are missing	data for 2020 submitted, data for 2019 not submitted	data for 2020 submitted, data for 2019 not submitted	not submitted, there are significant cash withdrawals
	complete data available for 93% of transactions	complete data available for 100% of transactions	complete data available for 100% of transactions	-
	5.00	-	-	-
Women's Forum	all statements submitted, SAI has no data	no	no	no
	complete data available for 100% of transactions	-	-	-
	-	-	-	-
Municipal boards	no	no	no	no
	-	-	-	-
Transparency score of the regular operation financing				3.10

[95] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

10.1.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	<i>other party was in charge of the finances</i>			
Kotor	<i>other party was in charge of the finances</i>			
Budva	<i>other party was in charge of the finances</i>			
Tivat	<i>did not participate</i>	-	-	-
Tuzi	<i>did not participate</i>	-	-	-
Andrijevica	<i>did not participate</i>			
Gusinje	<i>did not participate</i>	-	-	-
Transparency score of the election campaigns financing				-
Total transparency score of the party financing				3.10

What is missing?

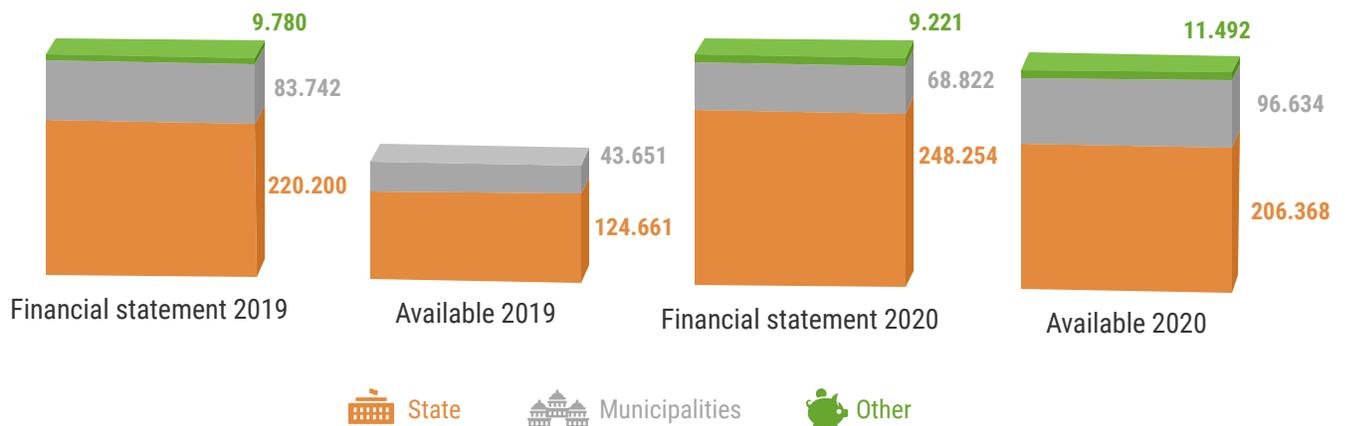
DNP did not provide us with statements from the head office account for four months of 2019, as well as statements from the foreign currency account and business card account of the party for that year. Several statements from the head office's bank account in 2020 are missing. In addition, DNP did not provide us with data on the consumption of the party's treasury, and the available information shows that in 2020, the party withdrew over 30 thousand euros in cash. A special issue is that the SAI did not audit DNP in the last two years, thus, there is no more detailed data on their official expenses, except for the very brief consolidated financial statements.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

According to the data from the final reports, total revenues of DNP in 2019 and 2020 were **around 300 thousand euro** each. That party provided us with data on only around 170 thousand euro of revenues for 2019, and around 315 thousand for 2020.

Comparison of data on total revenues from the financial statements with available information from all available accounts in 2019 and 2020



As stated, SAI did not audit the consolidated account of DNP, thus, it is impossible to determine why there are differences in revenue data, both when it comes to the state budget and municipalities.

In its financial statements, DNP reports a loan of nearly 70 thousand euro to be repaid in 28 months, but there is no data on when it was taken out, and it appears in 2019 report as well.

Revenue sources

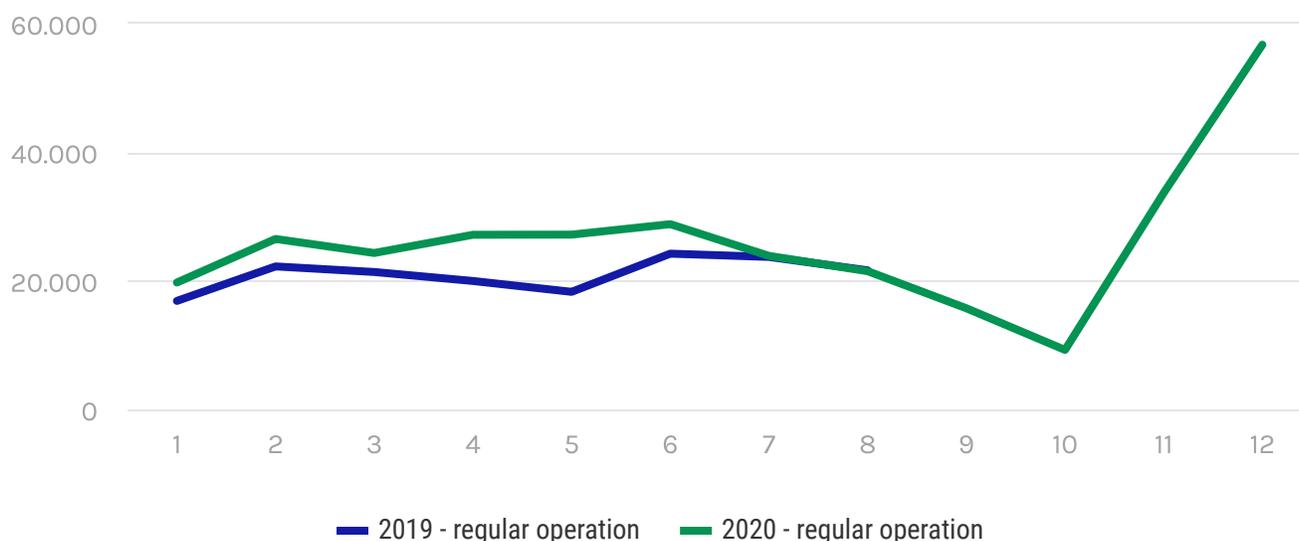
In 2020, the greatest source of revenue for DNP is the state budget, followed by municipal budgets. That party did not manage the financing of any election campaign, thus, it did not have separate accounts opened for those purposes.

10.2.

Average monthly revenues and payment dynamics

As already stated, only data for the first eight months of 2019 are available. In 2020, the average monthly income of DNP was around 26 thousand euro. The party had the highest revenues in June, and the lowest in October 2020.

All available revenues by months (2019 and 2020)



10.3.

ANALYSIS OF AVAILABLE DATA ON EXPENSES

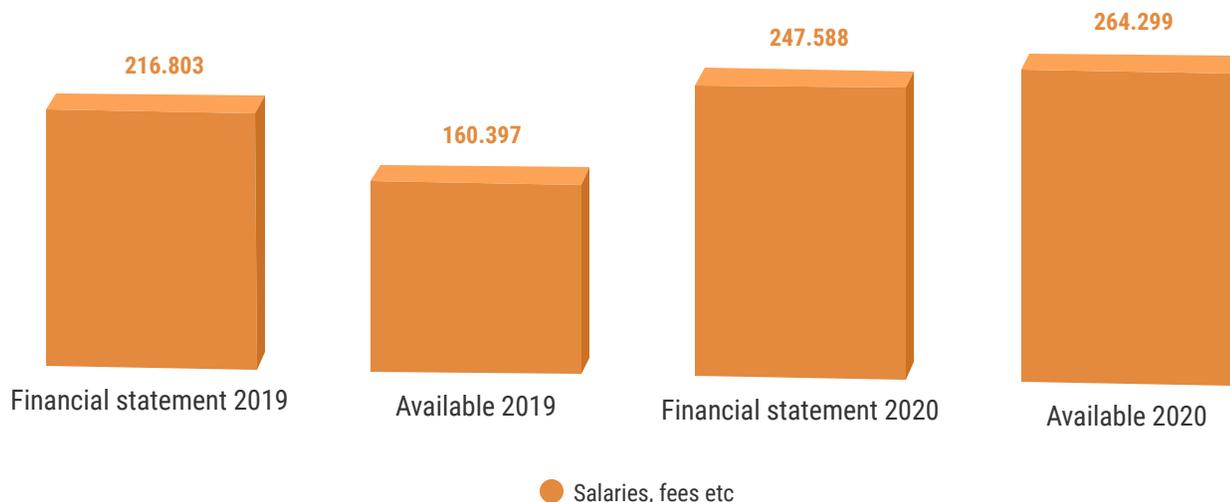
Total expenses

In 2019, official expenses [96] of DNP amounted to **less than 220 thousand euro**, and to **nearly 250 thousand in 2020**. That party provide us with data on around 160 thousand euros of the expenses in 2019, while for 2020, we have data on payments from DNP's account, which are around 17 thousand euro higher than the reported expenses of that party. That difference, however, could have occurred in case that DNP did not spend all the cash it withdrew that year, because we do not have data on the expenses paid from the treasury.

[96] Data are taken from DNP's financial statements and do not include depreciation and provisions 2020 report page 4 of the report https://www.antikorupcija.me/media/documents/Godi%C5%A1nji_konsolidovani_finansijski_izvje%C5%A1taj_za_2020._-_Demokratska_narodna_pa_jnHpz5Z.pdf
2019 report page 19 of the report https://www.antikorupcija.me/media/documents/Godi%C5%A1nji_konsolidovani_finansijski_izvje%C5%A1taj_za_2019._-_Demokratska_narodna_pa_G9vmmXz.pdf

10.3.

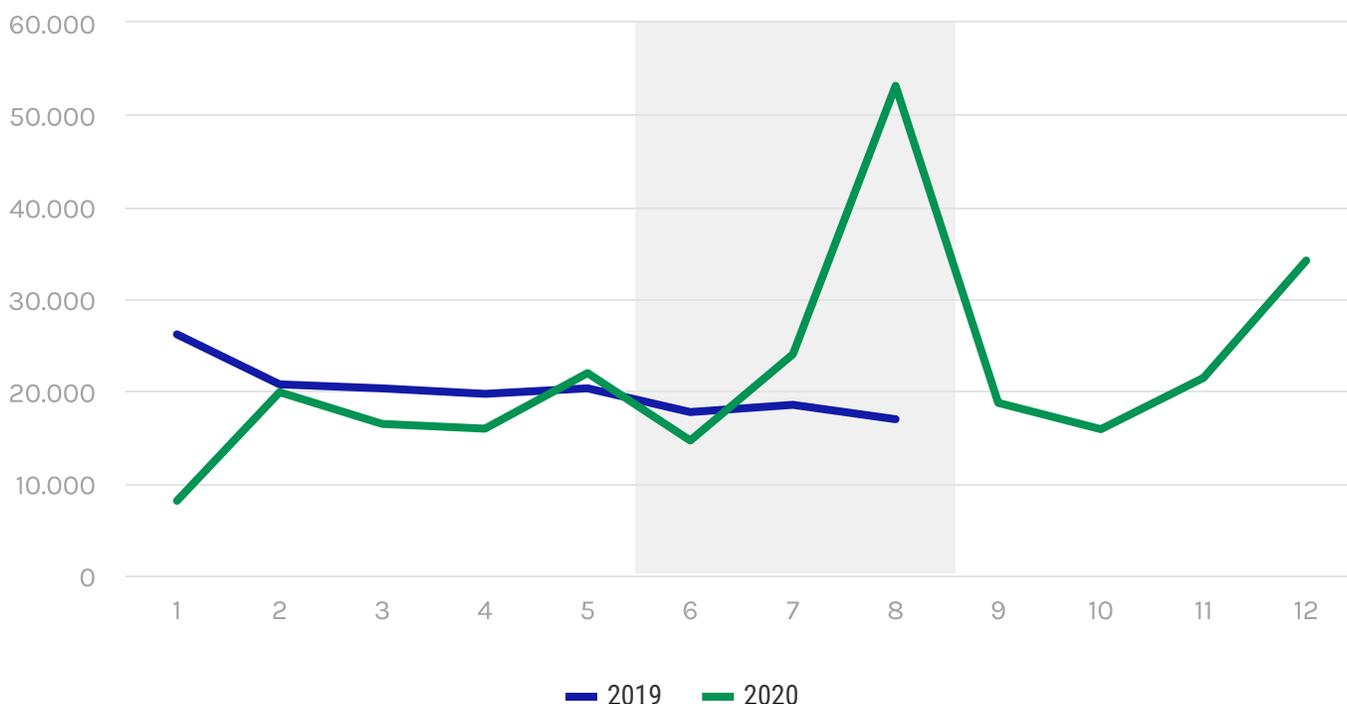
Comparison of data on total expenses from financial statements with available information from available accounts in 2019 and 2020



Monthly expenses

Average monthly spending of DNP in 2020 was around 22 thousand euros, while the data for 2019 are not complete. It is evident that in August 2020, the month when the elections were held, expenses were three times higher than in the same month of the previous year, and there was also a large increase in spending compared to all other months of that year.

Expenses of financing the regular operation, by months (2019 and 2020)



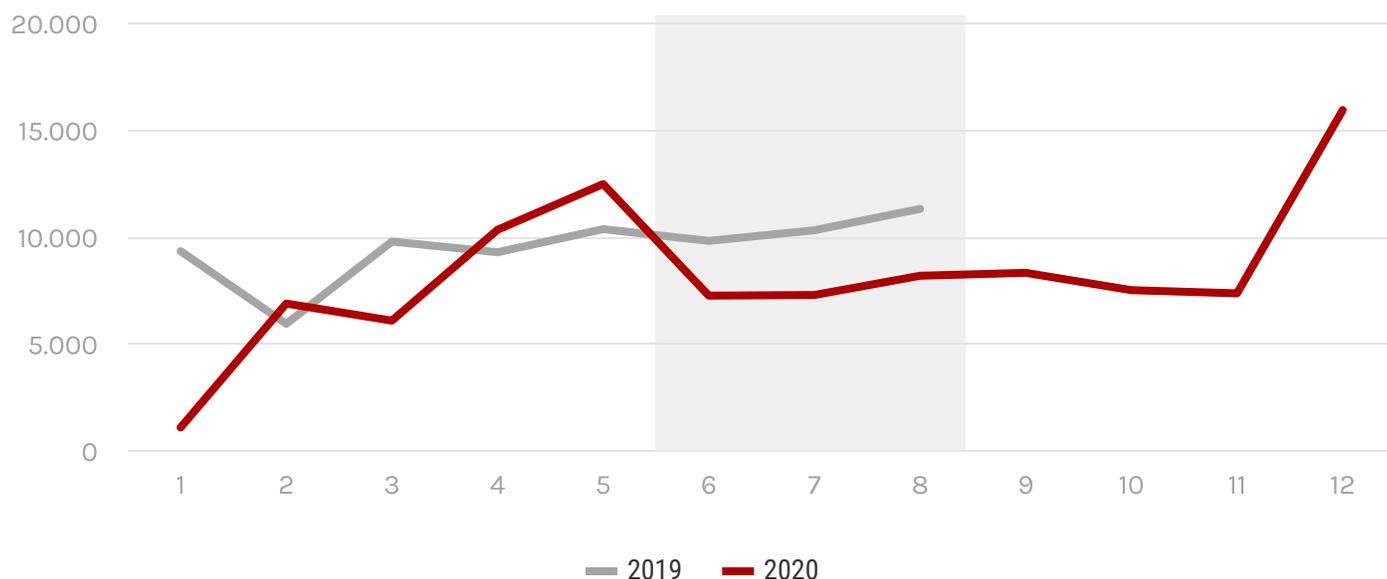
10.3.

Which expenses of regular operation increased in the election year?

Since data on spending during last four months of 2019 are not available, in this chapter, we are going to observe only the dynamics of expenses by months.

Payments to natural persons. These payments did not increase during the election campaign compared to other months of the year, or in relation to the same period of the previous year.

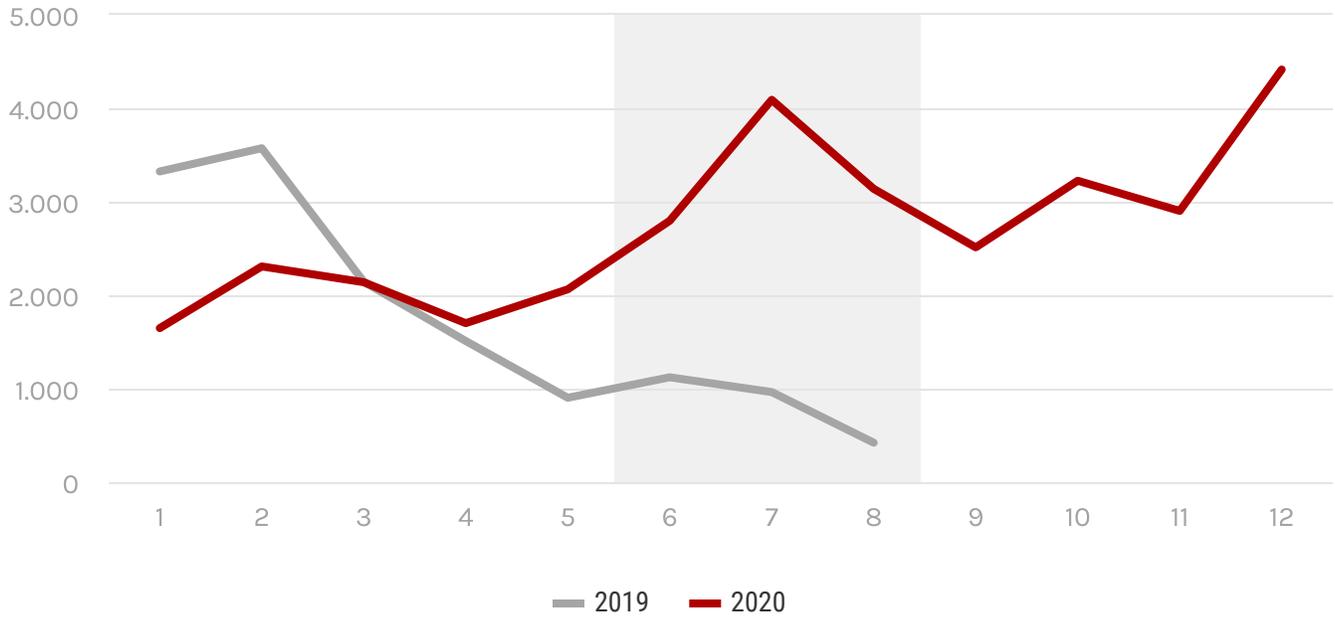
Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. During the election campaign, especially in July, the expenses of office supplies, equipment and overhead increased compared to other months of the year, as well as in relation to the same period of the previous year. This growth is mainly due to increased rent expenses paid to natural persons.

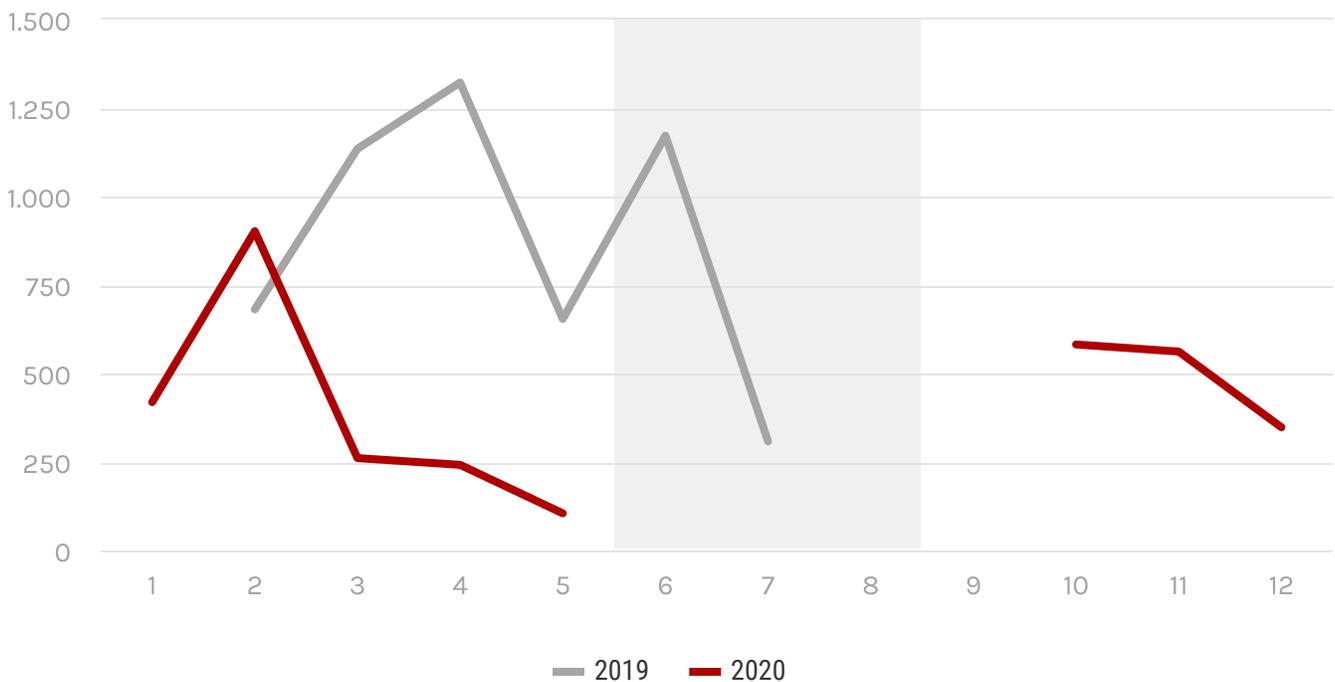
10.3.

Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by months (2019 and 2020)



Transportation. During the election campaign, DNP did not pay transportation expenses from any of the accounts available to us.

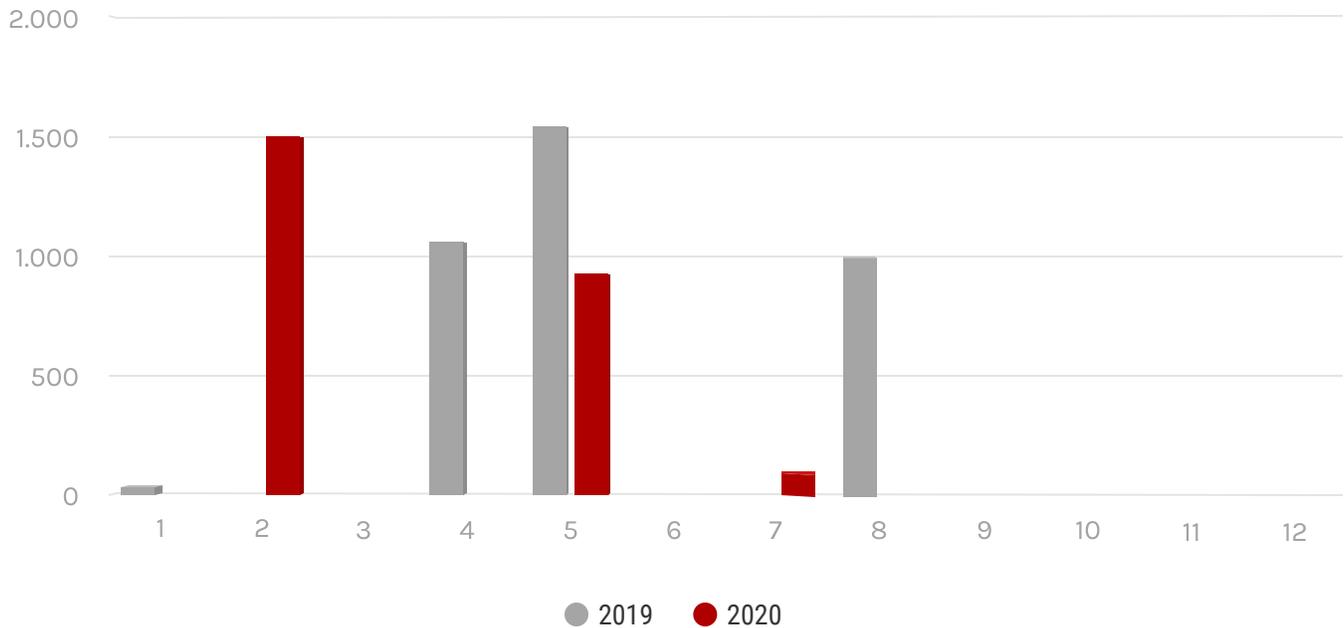
Transportation expenses from funds for financing the regular operation, by months (2019 and 2020)



10.3.

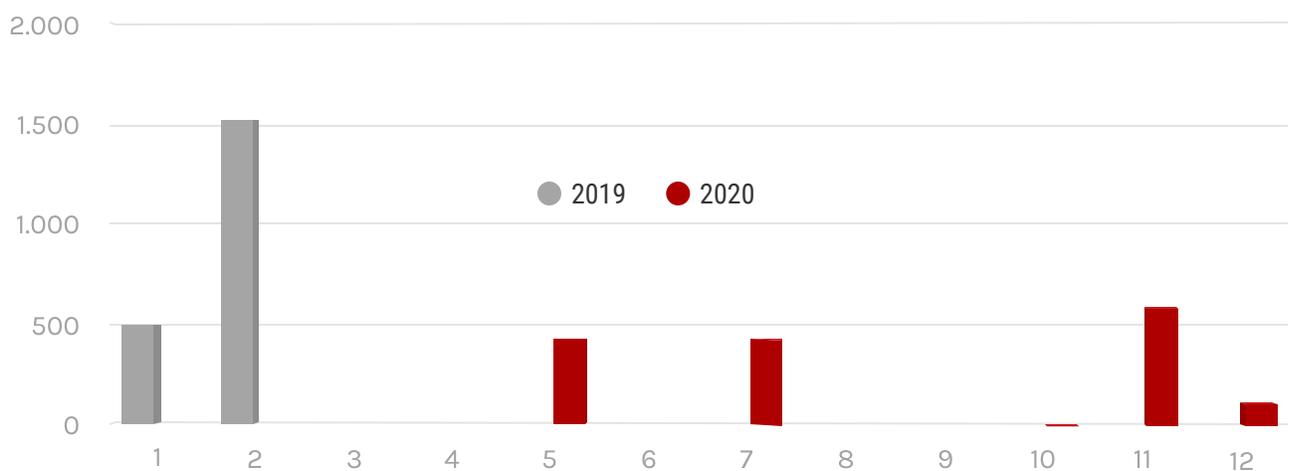
Promotional material. These expenses were negligible during the election campaign.

Expenses of promotional materials from funds for financing the regular operation, by months (2019 and 2020)



Advertising. During the election campaign, DNP paid lower advertising expenses from the account for financing the regular operation, and only in July 2020.

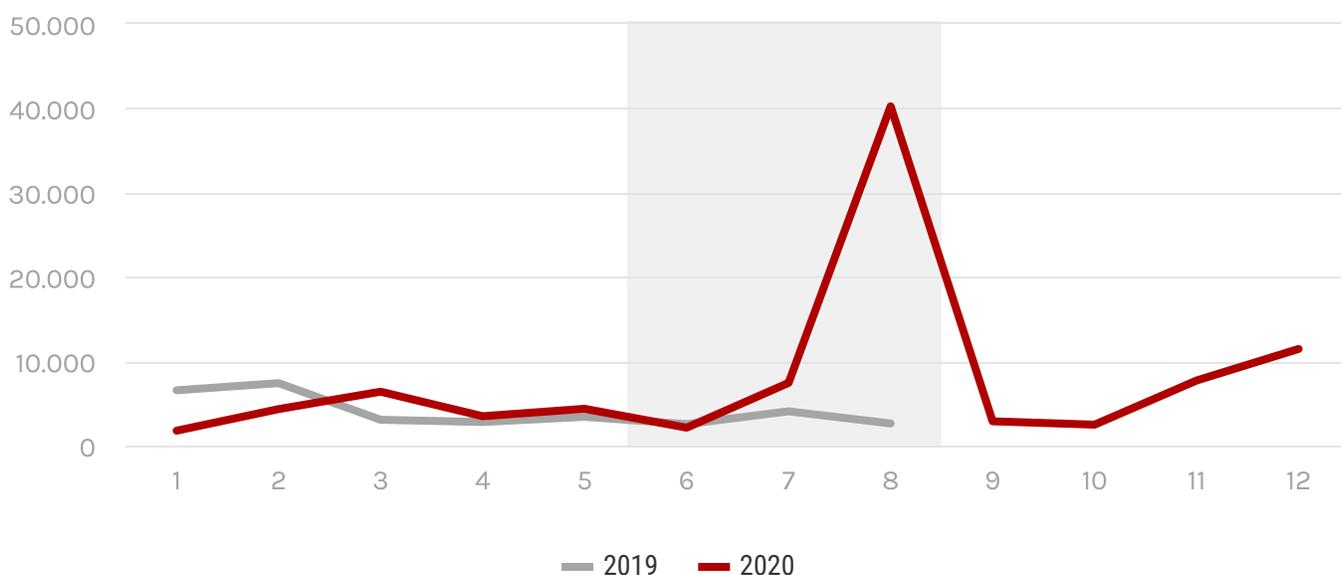
Advertising expenses from the funds for financing the regular operation, by months (2019 and 2020)



10.3.

Other expenses. In July and especially in August, there was a large increase in other expenses paid from the account for regular financing of DNP. **The July increase was due to high accommodation expenses in the Budva Riviera of over five thousand euros.** The August increase refers to the payment of 37 thousand euros to the New Serb Democracy for financing the campaign for the parliamentary elections.

Other expenses from the funds for financing the regular operation, by months (2019 and 2020)



10.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

In its official financial statements, DNP cites conflicting figures on the expenses it had in campaign for the parliamentary elections. That party took over the payment of over 80 thousand euros of debt for election marketing to Pink Media M, and in the data it provided, there is no evidence that it ever paid that debt.

10.4.

According to the agreement reached by the members of the coalition "For the Future of Montenegro", DNP was obliged to pay Pink Media M over 81.5 thousand euros in election campaign expenses.

Подгорица
21.10.2020. године

21 10 20

ДЕМОКРАТСКА НАРОДНА ПАРТИЈА
ЦРНЕ ГОРЕ
Број: 639/20
Подгорица, 21.10.2020.

ПРОТОКОЛ О СРАВЊЕЊУ

ЧЛАН 1

Овим Протоколом се дефинише испуњење заједничких обавеза, између конституената Коалиције ЗА БУДУЋНОСТ ЦРНЕ ГОРЕ, Нове српске демократије, Покрета за промјене и Демократске народне партије, Социјалистичке народне партије, Праве Црне Горе, Уједињене Црне Горе и Радничке партије насталих као заједнички трошкови поводом изборне кампање и накнадне услуге рекламе "ХВАЛА ТИ ЦРНА ГОРО" (15.000,00€) ових политичких субјеката

ЧЛАН 2

Потписници овог Протокола се обавезују да предметне обавезе, КОЈЕ ИЗНОСЕ 434.555,64 измире на следећи начин:

НСД		
	PINK MEDIA M	81.513,29
	LIMANAKI STUDIO	50.000,00
	DRUSTVO ZA RAVNOPRAVNOST	15.322,50
	УКУПНО	146.835,79

ПЗП		
	PINK MEDIA M	81.575,44
	УКУПНО	81.575,44

ДНП		
	PINK MEDIA M	81.575,44
	УКУПНО	81.575,44

Photo 26: Protocol on the settlement of liabilities between the constituents of the coalition "For the Future of Montenegro"

Thus, according to the available data, DNP paid 37 thousand euros to Nova for the needs of organizing the election campaign, and took over the debt of 81.5 thousand, which is a total of 118.5 thousand euros. However, DNP claims that the campaign cost the party an additional eight thousand euros. It is not possible to determine what these expenses refer to and whether they were presented in the official statement on the financing of the parliamentary elections campaign, which was submitted by the New Serb Democracy on behalf of the entire coalition.

DNP did not pay its debts to Pink Media M from any account of that party that was submitted to us by the end of May 2022. [97]

[97] During 2021 and 2022, MANS continued to gather data on regular operation of the parliamentary political parties, which will be the subject of analysis in the next publication. In the context of this analysis, we used that data to determine whether the parties paid all the expenses of the election campaign.

D.11. DEMOS

In two years, DEMOS earned nearly 450 thousand euros, and all those funds came from the state.

That party is highly transparent, and its average score is 4.98.

During the election campaign, DEMOS had higher expenses of regular operation compared to the same period of the previous year, as follows:



increased salary payments to employees,



vehicle rental expenses,



purchase of computer equipment.

DEMOS did not independently finance election campaigns, but operated within coalitions whose finances were managed by other parties.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from DEMOS on inflows and outflows from six accounts during 2019 and 2020: one account of the head office, one account of the Women's Forum, one account of the Municipal Board of Bar which was closed in the meanwhile, one foreign currency account, and two business cards. In addition, we were provided with data on consumption from the head office treasury.

Transparency scores of financial operations

Total transparency score [98] of financing of DEMOS is 4.98. It is also a transparency score of the financing of the party's regular operation, because it did not manage the financing of any election campaign, thus, there is no transparency score of the election campaigns financing.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	5.00	5.00	4.00
Head office	all statements submitted	all statements submitted	all statements submitted	SAI has no data
	complete data available for 100% of transactions	complete data available for 100% of transactions	complete data available for 99% of transactions	complete data available for 82% of transactions, cash withdrawal from the account coincides with 100% of the head office treasury inflows
	5.00	-	-	-
Women's Forum	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
	5.00	-	-	-
Municipal boards	all statements for 1 municipal board submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Transparency score of the regular operation financing				4.98

[98] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	<i>other party from the coalition was in charge of the finances</i>			
Kotor	<i>other party from the coalition was in charge of the finances</i>			
Budva	<i>other party from the coalition was in charge of the finances</i>			
Tivat	<i>did not participate</i>	-	-	-
Tuzi	<i>did not participate</i>	-	-	-
Andrijevica	<i>other party from the coalition was in charge of the finances</i>			
Gusinje	<i>did not participate</i>	-	-	-
Transparency score of the election campaigns financing				-
Total transparency score of the party financing				4.98

What is missing?

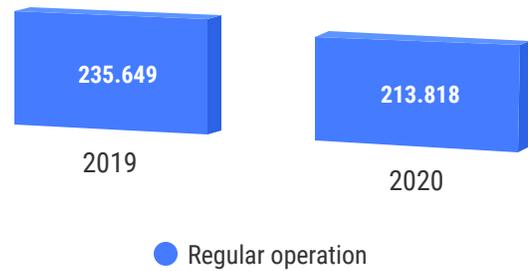
SAI did not audit the financial statements of DEMOS in 2019 or 2020, thus, it is not possible to determine whether some data are missing and which.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues of DEMOS in 2019 were **around 235 thousand euros**, while in 2020, they amounted to **less than 215 thousand euros**.

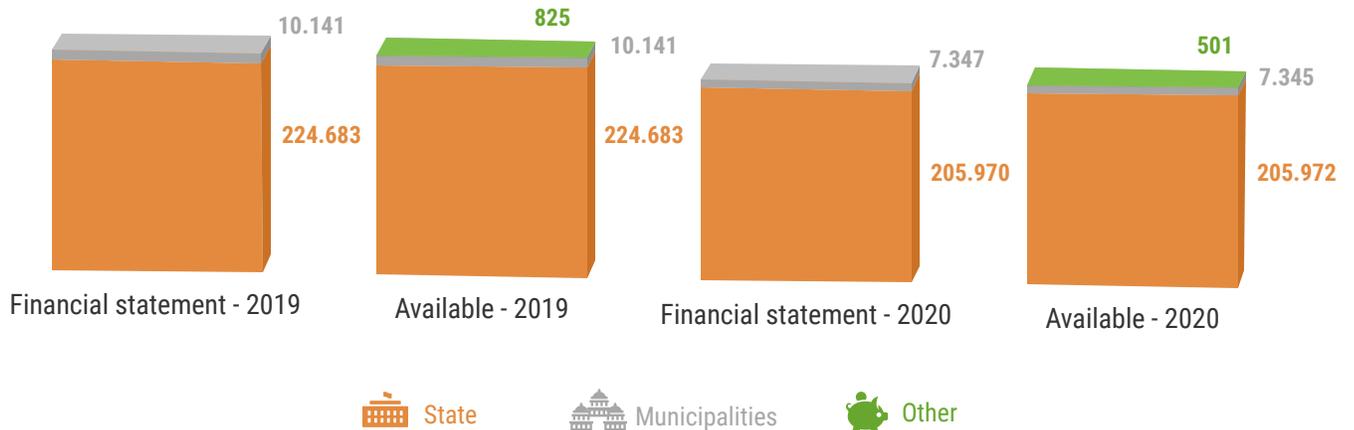
Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with data from financial statements

SAI did not audit the financial statements of DEMOS in 2019 or 2020. The available data match the information provided in the consolidated financial statements of that party, except for smaller amounts of other revenues that are not specified in official documents.

Comparison of total revenues from financial statements with available information from all available accounts in 2019 and 2020

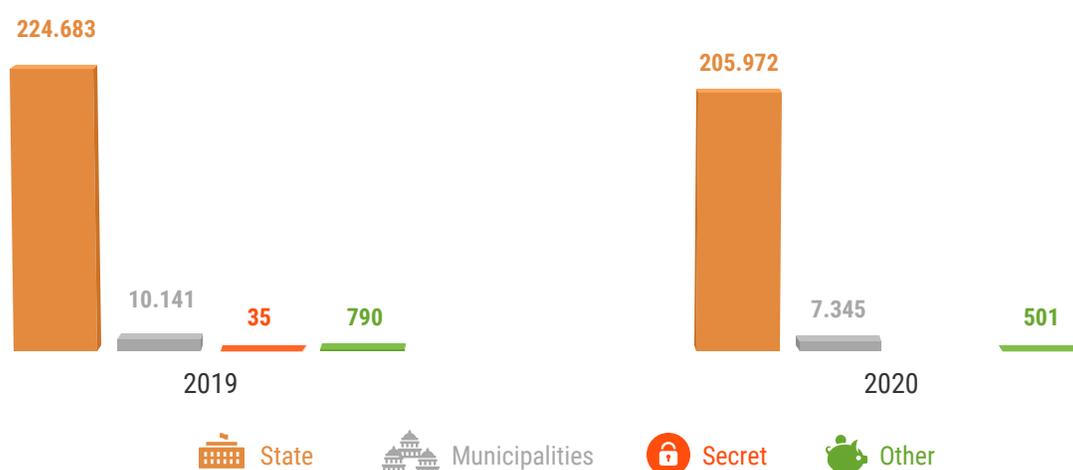


Revenue sources

Greatest source of funding is the state budget, followed by the budget of the Municipality of Budva, which is the only municipality that allocates funds for DEMOS at the local level.

The party operates only through the head office, and the only bank account of the municipal board in Bar was closed at the beginning of 2019.

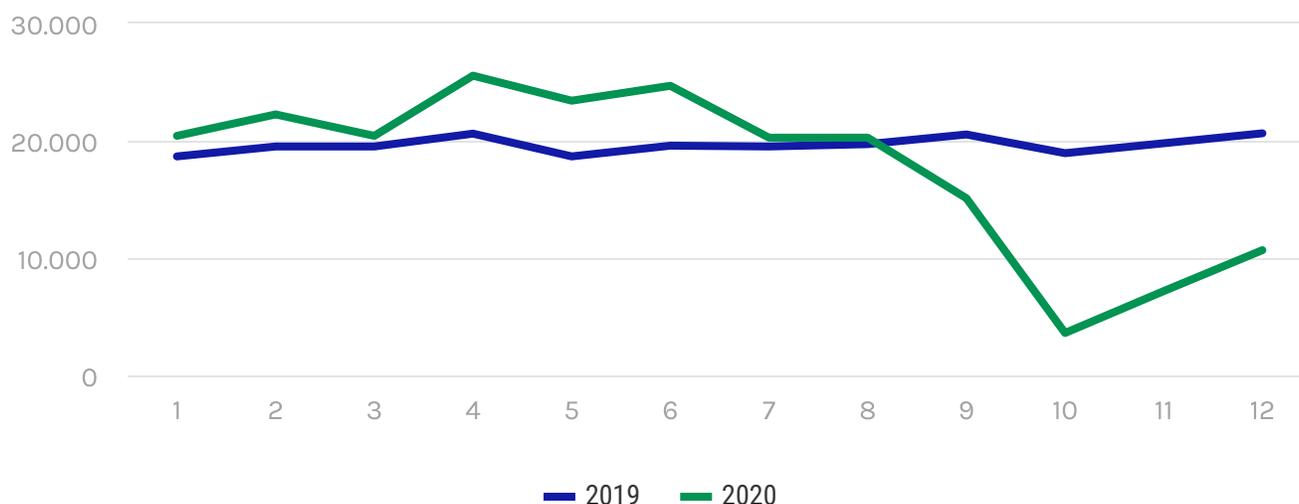
Revenue sources in 2019 and 2020



Average monthly revenues and payment dynamics

In 2019 and 2020, until the end of the election campaign, average monthly revenues of DEMOS were around 20 thousand euros. After that, the revenues from the state and municipalities dropped significantly, and increased to some extent at the end of 2020.

All available revenues by months (2019 and 2020)

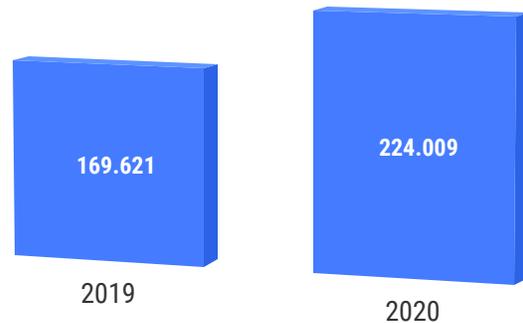


ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

In 2019, DEMOS' expenses amounted to **nearly 170 thousand euros**, and **over 220 thousand euros** in 2020.

Available expenses of regular operation and election campaigns (2019 and 2020)

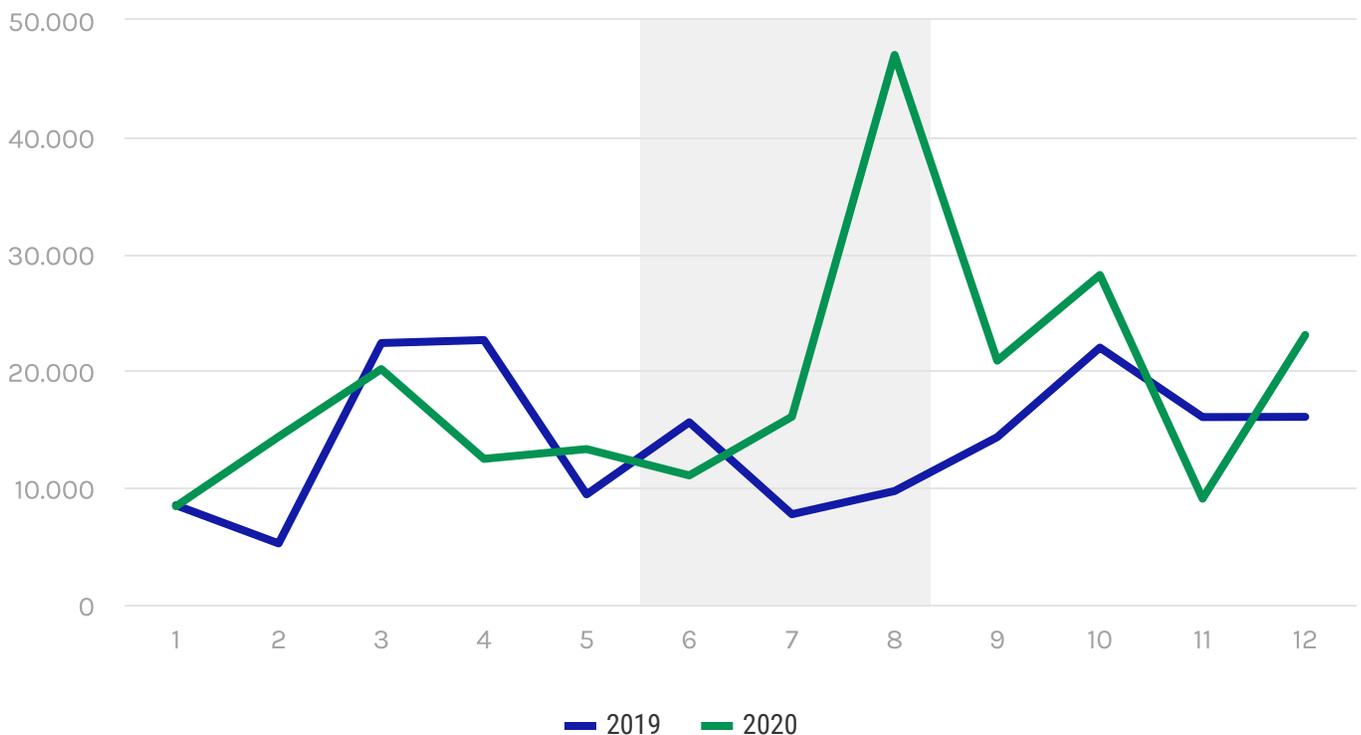


Monthly expenses

In July, and especially in August 2020, there was a multiple increase in the expenses of DEMOS compared to the same period of 2019.

● Regular operation

Expenses of financing the regular operation, by months (2019 and 2020)

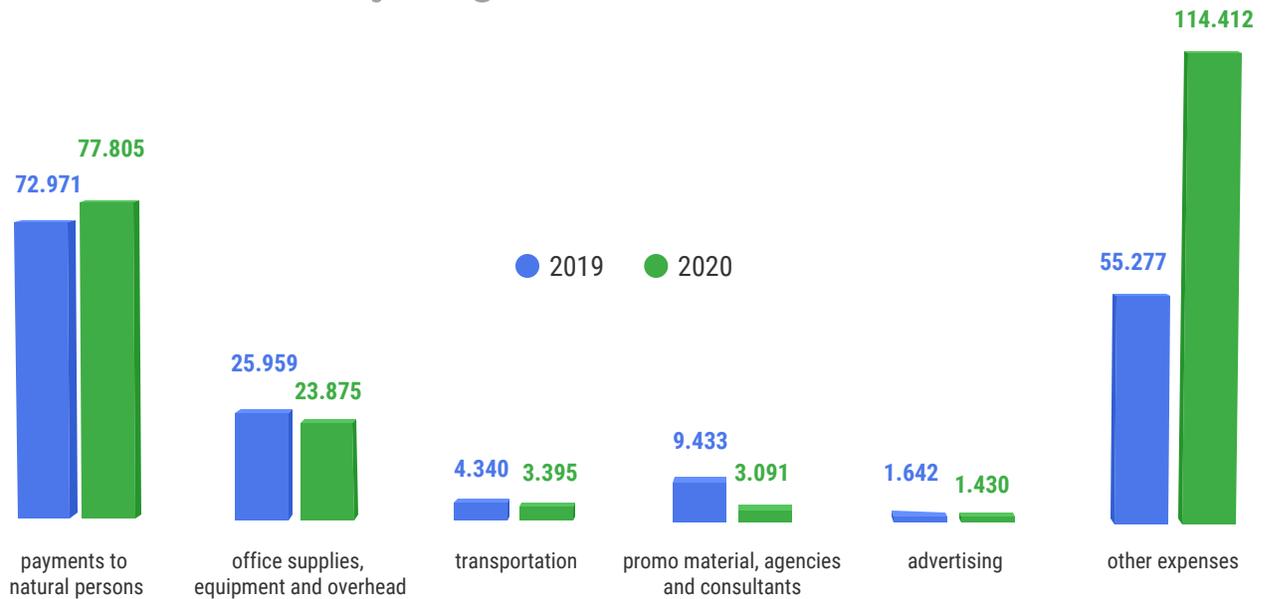


11.3.

Which expenses of regular operation increased in the election year and during the election campaign?

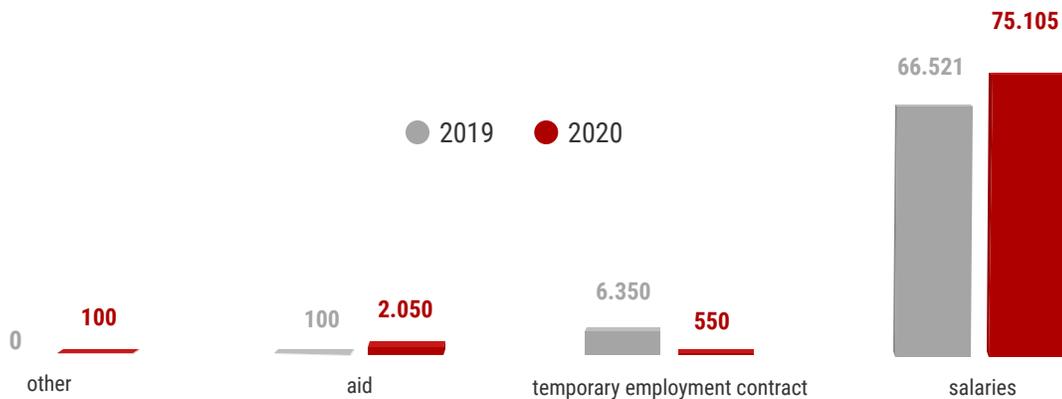
In the election year, other expenses doubled, and there was a smaller increase in payments to natural persons.

Expenses of the regular operation, by categories (2019 and 2020)



Payments to natural persons. In the election year, the expenses of salaries and aid payments to natural persons increased.

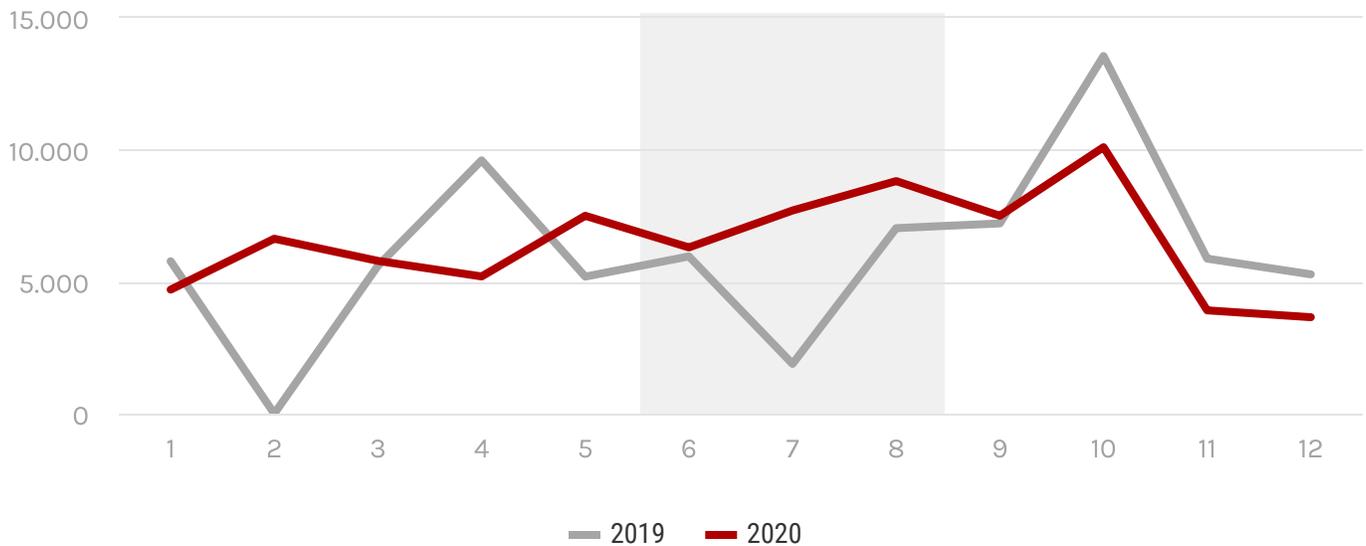
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



11.3.

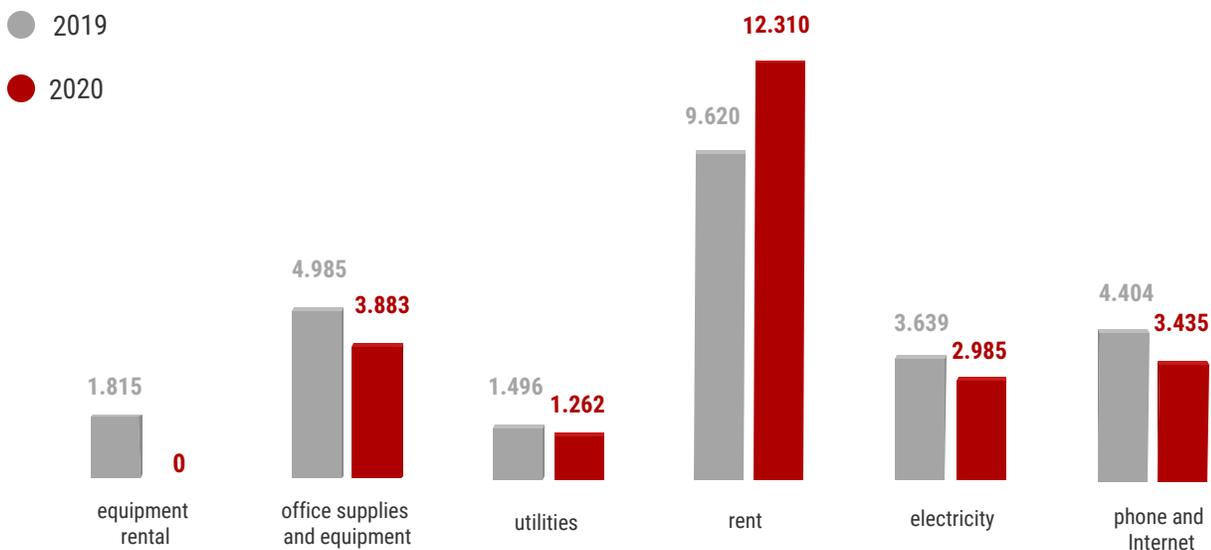
In July and August 2020, during the election campaign, payments to natural persons increased compared to the same period of the previous year. It is entirely about the increase of salaries' expenses.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. In the election year, the expenses of rent paid to natural persons increased.

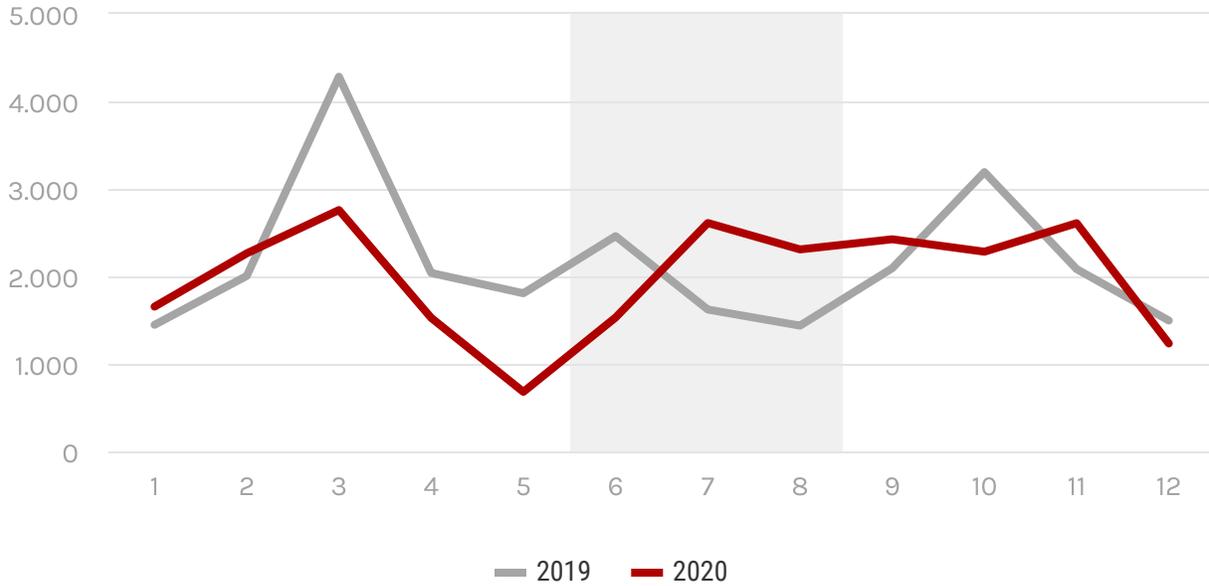
Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by types (2019 and 2020)



11.3.

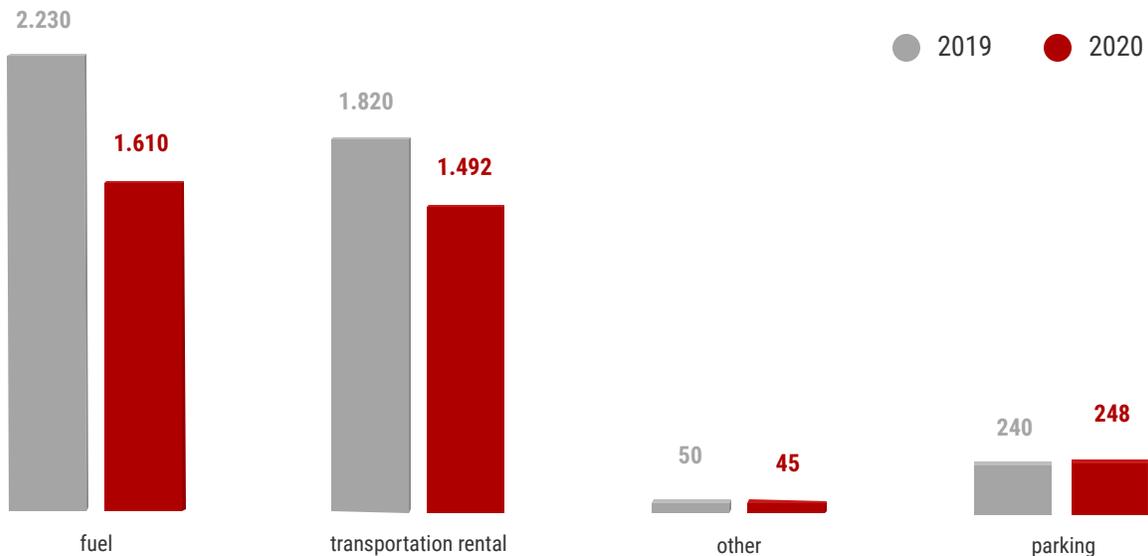
The increase in expenses took place in July and August 2020, mainly due to the purchase of equipment, as well as slightly higher rent expenses than in the same period of the previous year.

Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by months (2019 and 2020)



Transportation. Transportation expenses are lower in the election year than in the previous year.

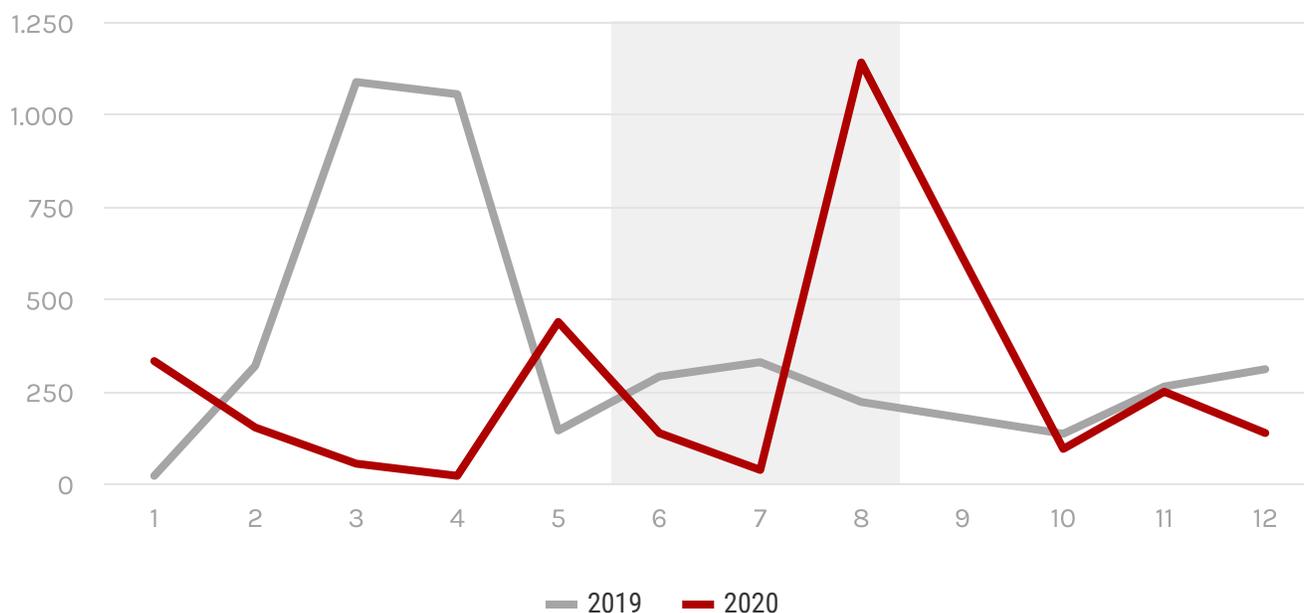
Transportation expenses from funds for financing the regular operation, by types (2019 and 2020)



11.3.

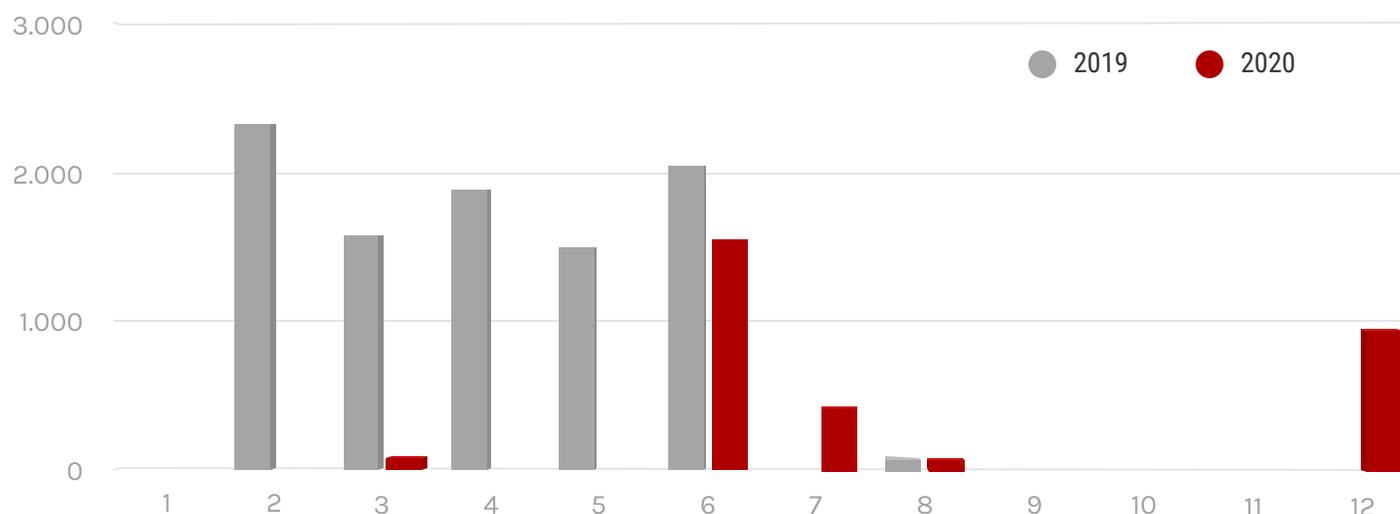
However, these expenses are five times higher during August 2020 compared to the same month of 2019. It is about increased expenses of vehicle rental.

Transportation expenses from funds for financing the regular operation, by months (2019 and 2020)



Promotional material. In most months of 2020, DEMOS had no expenses of promotional material. These expenses were slightly higher in June, mainly due to payments to company Spider Max Podgorica.

Expenses of promotional material from funds for financing the regular operation, by months (2019 and 2020)



11.3.

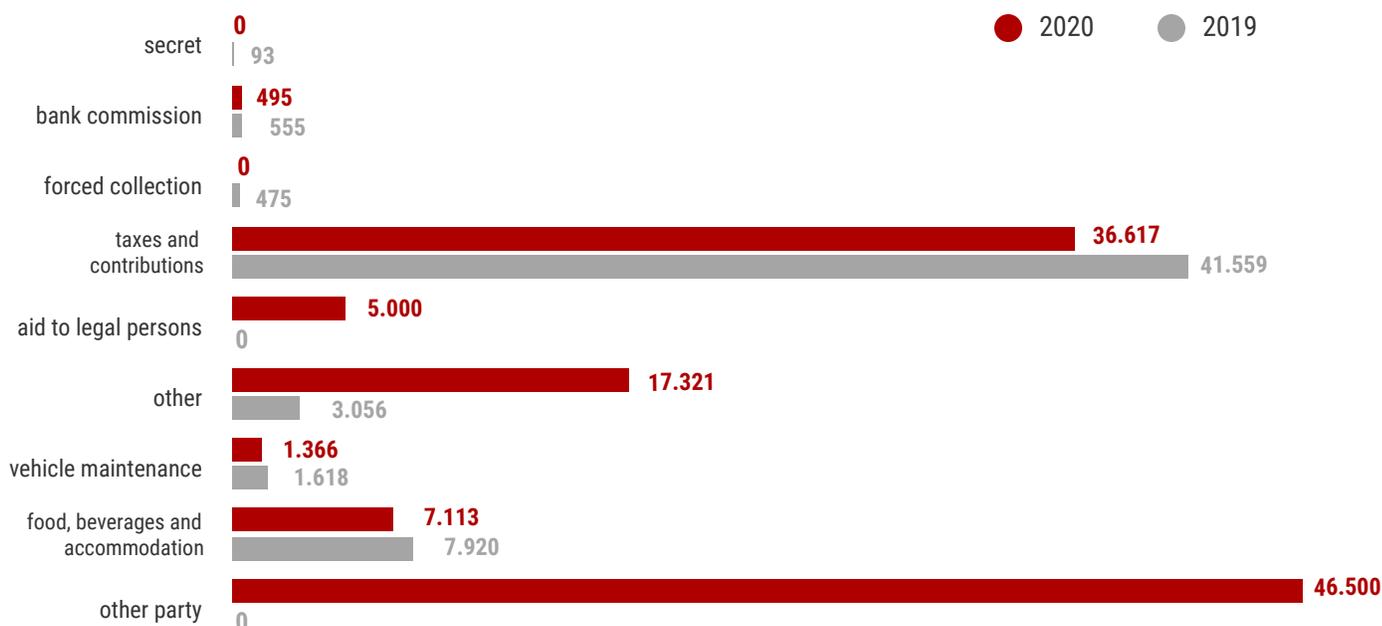
Advertising. While in 2019 all advertising expenses related to daily newspapers, in 2020, all funds for these purposes were spent on advertising on social media. Advertising on Facebook started in the month when the elections were held and lasted until the end of 2020. These amounts, however, are not significant.

Advertising expenses from funds for financing the regular operation, by months (2019 and 2020)



Other expenses. The expenses of food, beverages and accommodation, as well as the expenses of taxes and contributions increased during the election campaign, although their total amount during that year was lower than the previous one. Greatest part of other expenses relates to payments to other parties in the amount of 46.5 thousand euros. They include the transfer of 36.5 thousand euros to the Democratic Montenegro, which participated together with DEMOS in the parliamentary elections, and 10 thousand euros to the Democratic Front, which participated together with DEMOS in local elections in Budva.

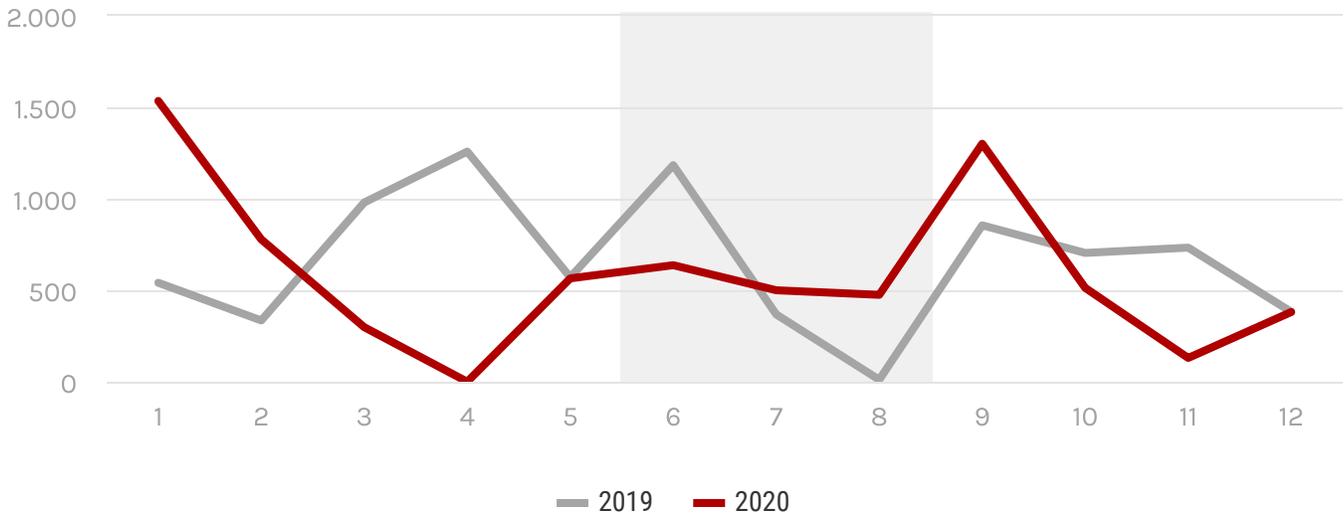
Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



11.3.

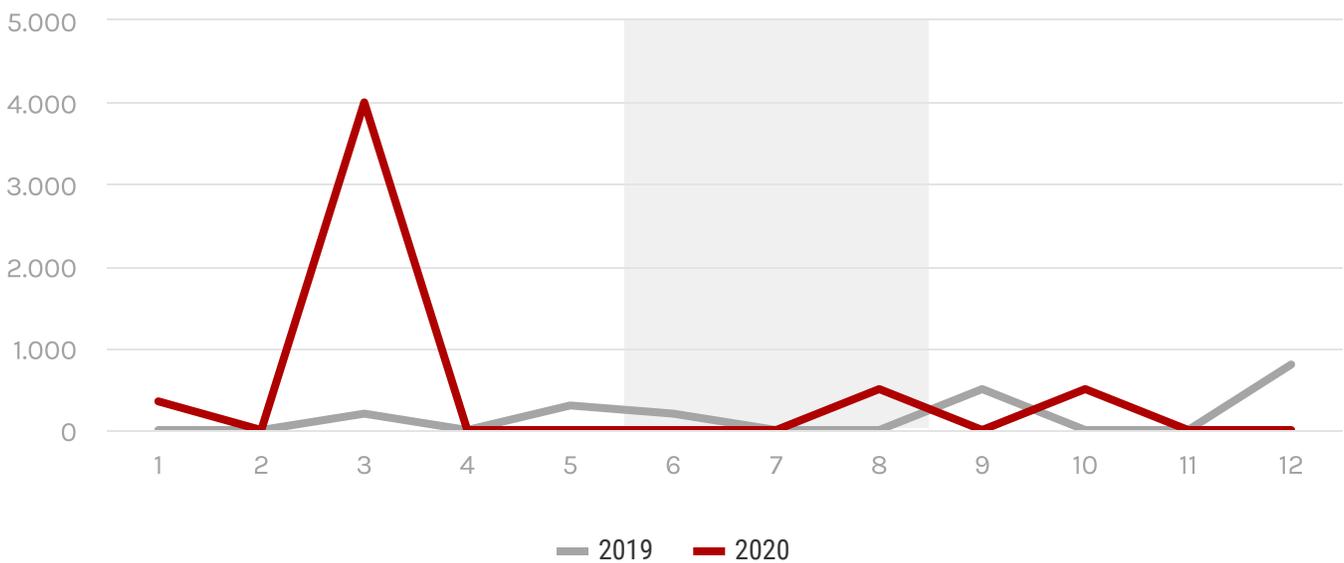
The expenses of food and beverages increased in August of the election year compared to the previous one, but that amount is not significant.

Expenses of food, beverages and accommodation from the funds for financing the regular operation, by months (2019 and 2020)



Cash Money. DEMOS mostly withdrew smaller amounts of cash, except in March 2020.

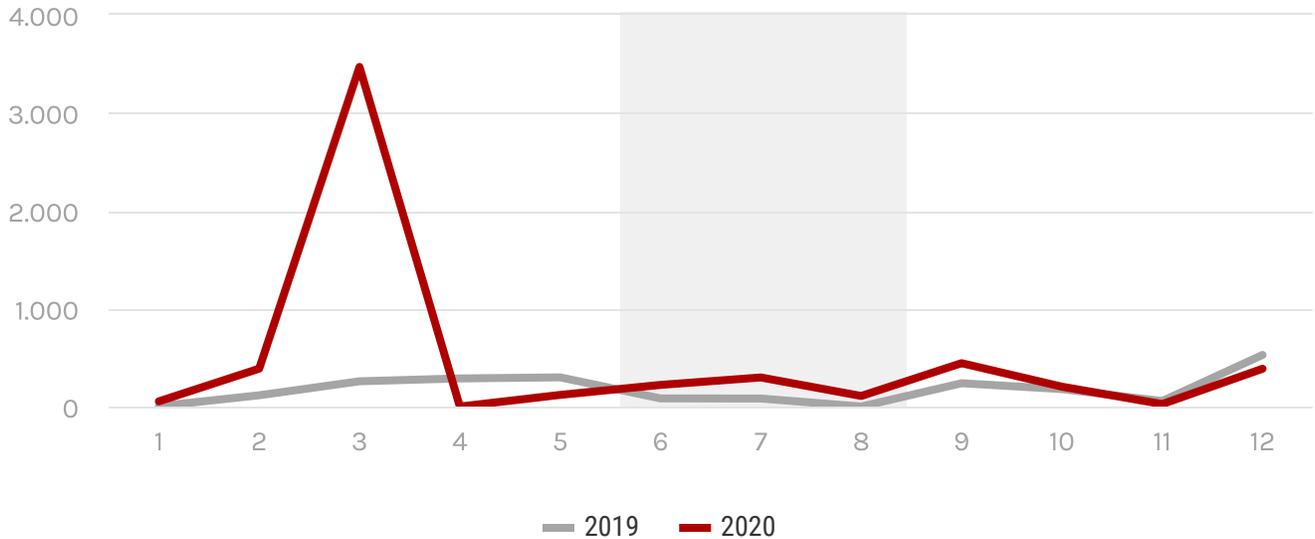
Dynamics of cash withdrawal from funds for financing the regular operation, by months (2019 and 2020)



11.3.

There are no major payments from the DEMOS' treasury except in March 2020, and these expenses relate to the purchase of gifts for March 8.

Dynamics of cash consumption from funds for financing the regular operation, by months (2019 and 2020)



11.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

DEMOS did not manage the finances for any election campaign in 2019 and 2020.

D.12.

Croatian Civic Initiative (HGI)

Croatian Civic Initiative earned nearly 370 thousand euros in two years, and almost all funds came from public sources.

That party is transparent, and its average score is 4.92.

HGI increased the expenses of financing the regular operation during the election campaign compared to the same period of the previous year as follows:



higher payments to natural persons in the month when the elections were held,



phone expenses doubled,



two payments from the treasury whose purpose is unknown.

After the parliamentary elections, HGI lost the status of the parliamentary party that it had during 2019 and the first half of 2020.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from the Croatian Civic Initiative on inflows and outflows from six bank accounts during 2019 and 2020: one head office account, one Women's Forum account, one foreign currency account, three accounts for financing the election campaigns - one for the parliamentary elections, and one each for local elections in Kotor and Tivat. In addition, we were provided with data on consumption from the treasury.

Transparency scores of financial operations

Total transparency score [99] of financing of HGI is 4.92. Transparency score of the regular operation financing of that party is 4.89, while the transparency score of the election campaigns financing is 5.0.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	5.00	-	4.00
Head office	all statements submitted	all statements submitted	no	SAI has no data
	complete data available for 100% of transactions	complete data available for 100% of transactions	-	complete data available for 81% of transactions, cash withdrawal from the account and repayment of the down payment do not match in all cases
Women's Forum	5.00	-	-	-
	all statements submitted	no	no	no
Municipal boards	complete data available for 100% of transactions	-	-	-
	-	-	-	-
Municipal boards	no	no	no	no
	-	-	-	-
Transparency score of the regular operation financing				4.89

[99] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	-	-	-
2020 Elections	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
	5.00	-	-	-
Kotor	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Budva	<i>did not participate</i>	-	-	-
	5.00	-	-	-
Tivat	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Tuzi	<i>did not participate</i>	-	-	-
Andrijevica	<i>did not participate</i>	-	-	-
Gusinje	<i>did not participate</i>	-	-	-
Transparency score of the election campaigns financing				5.0

Total transparency score of the party financing

4.92

What is missing?

HGI provided us with all data on bank accounts and treasuries recorded in the financial statements. However, the data on cash consumption are very brief and the purpose of the expenses cannot be determined more precisely.

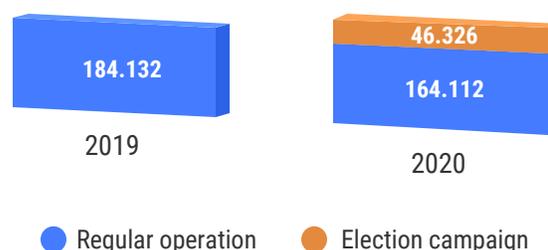
ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

In 2019, HGI had **over 180 thousand euros** in revenues, which were **around 20 thousand** less in 2020.

Total revenues for financing HGI's election campaigns were around 46 thousand euros.

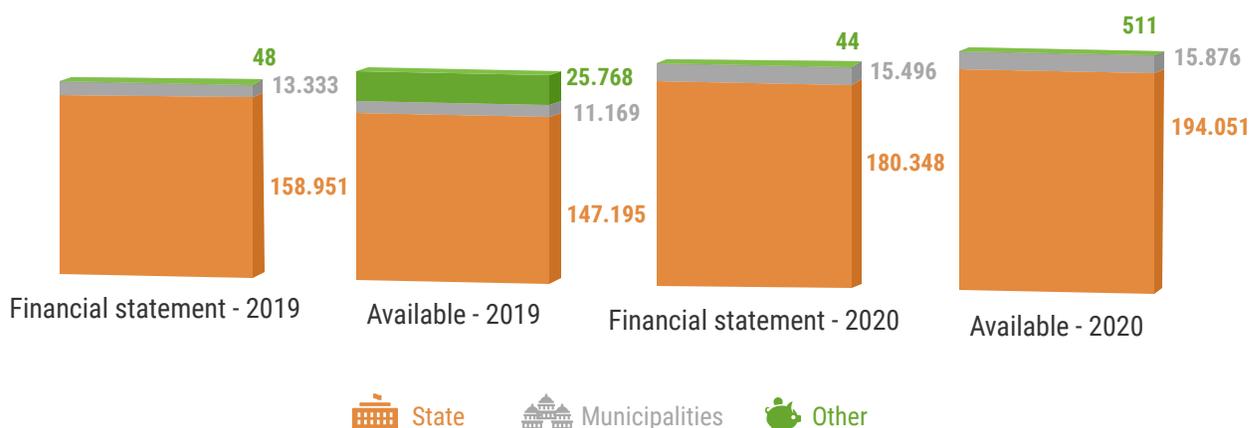
Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with data from financial statements

HGI's finances were not audited for 2019 or 2020, thus, it is not possible to determine whether the differences in data exist due to calculated, but uncollected revenues. In 2019, other revenues differ due to a loan of around 25 thousand euros.

Comparison of data from the financial statements on total revenues with available information from all available accounts in 2019 and 2020

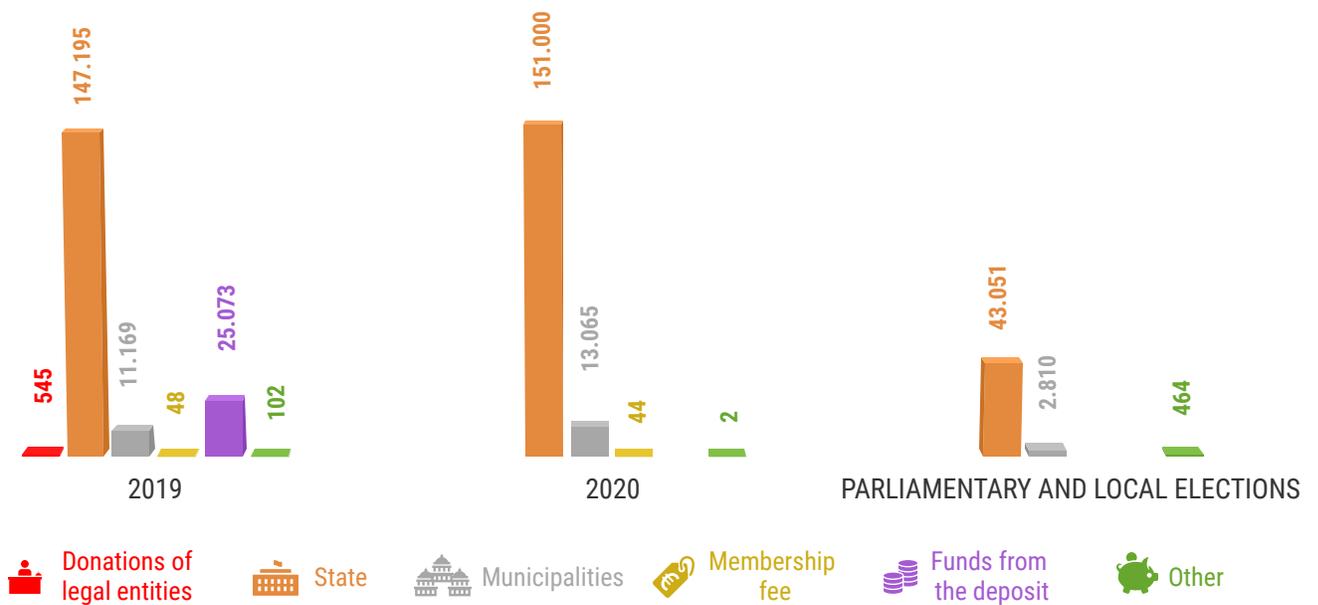


12.2.

Revenue sources

Most of HGI's official revenues come from the state, while municipalities are in second place, with significantly smaller amounts. Very modest funds were collected from membership fees, donations from legal entities are insignificant, while natural persons did not make contributions to that party. In 2019, HGI paid over 25 thousand euros into the account for financing the regular operation of the party, and the maturity of the deposit is stated as the source of funds.

Revenue sources in 2019 and 2020

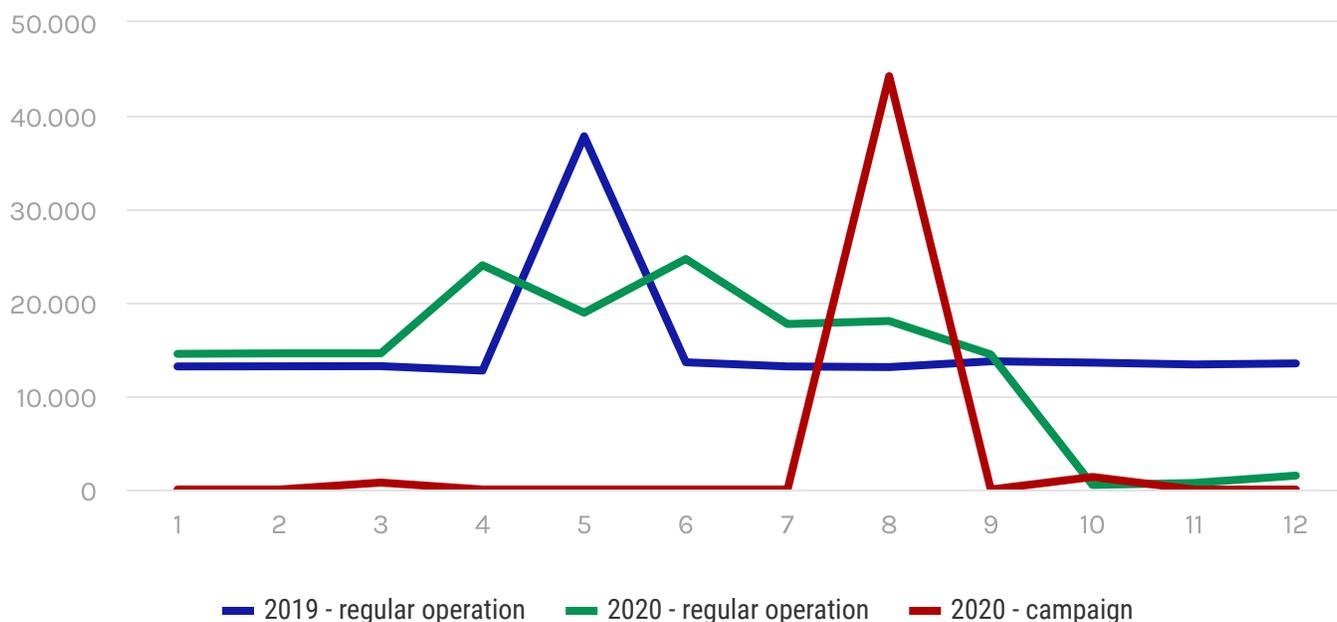


12.2.

Average monthly revenues and payment dynamics

HGI had large fluctuations in monthly revenues, especially in 2020. During 2019, that party had an average monthly income of around 13 thousand euros, and in May of that year, it took out a loan. In 2020, the average revenues were at a similar level, and after the parliamentary elections, HGI did not win a single parliamentary seat and lost funding from the state budget.

All available revenues by months (2019 and 2020)



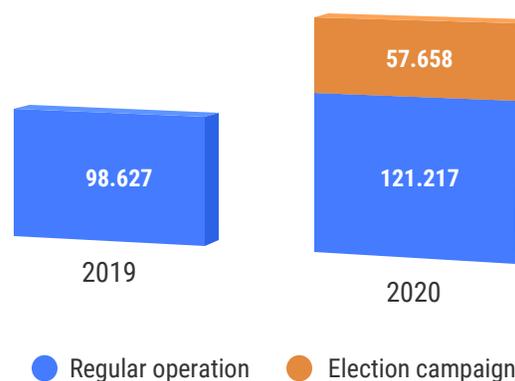
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

During 2019, total expenses of regular operation of HGI were **less than 100 thousand euros**, while in 2020, they increased by **around 20 thousand**.

In addition, election campaign expenses were nearly 60,000 euros that year.

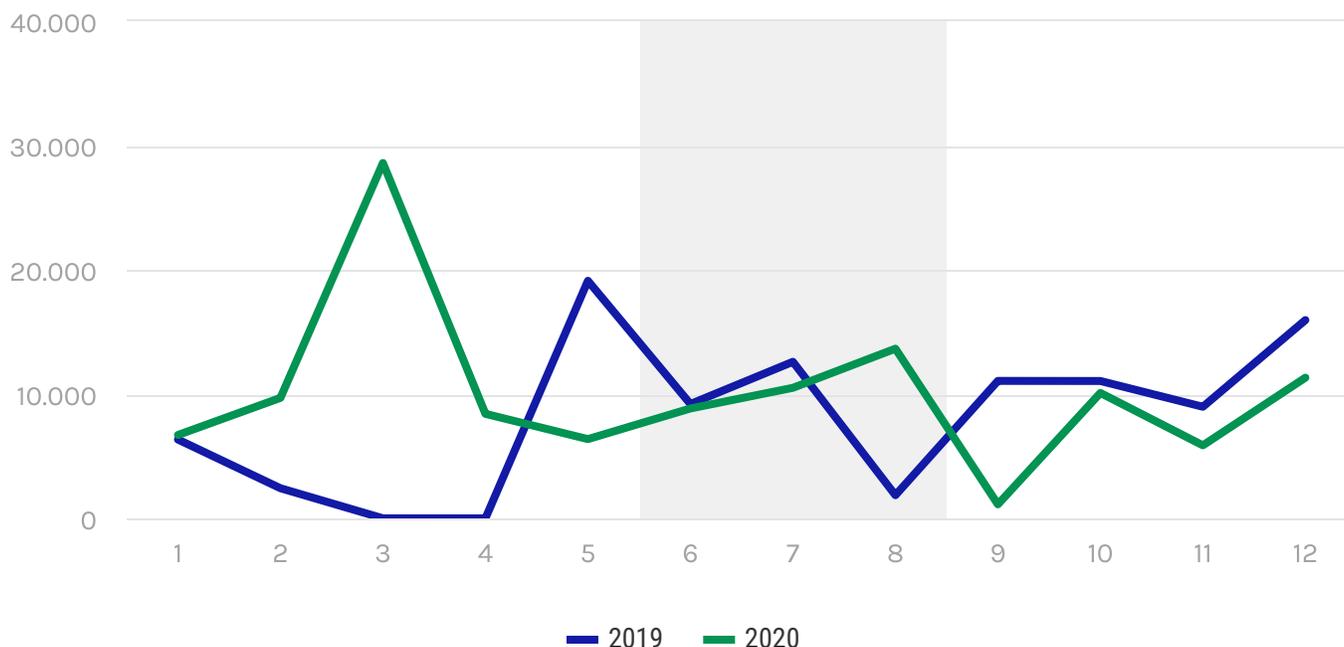
Available expenses of regular operation and election campaigns (2019 and 2020)



Monthly expenses

In August 2020, the month when the elections were held, HGI had multiplied expenses of financing the regular operation of that party. During the second two months of the election campaign, spending was at a similar level as in the previous years.

Expenses of financing the regular operation, by months (2019 and 2020)

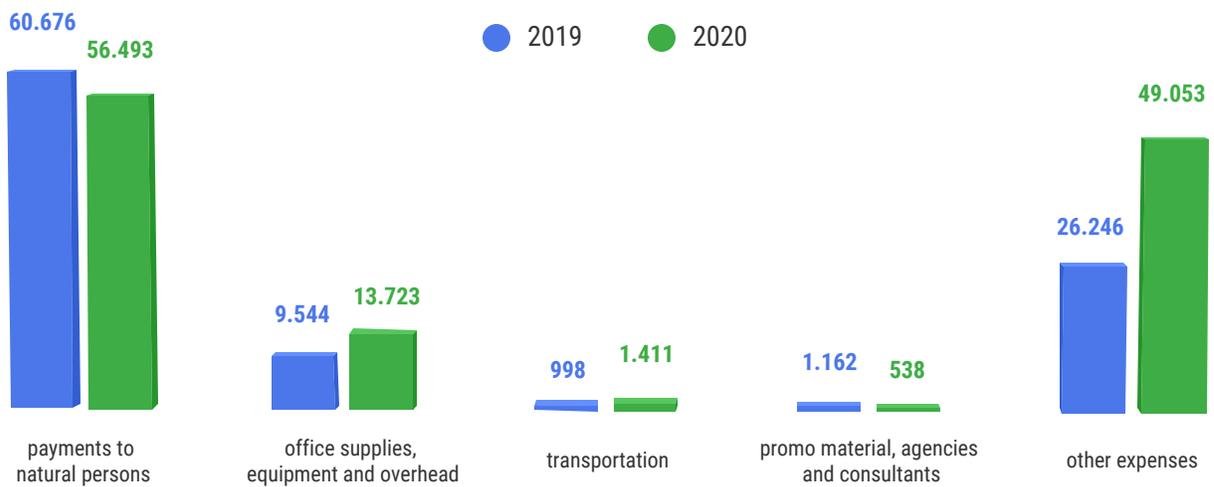


12.3.

Which expenses of regular operation increased in the election year and during the election campaign?

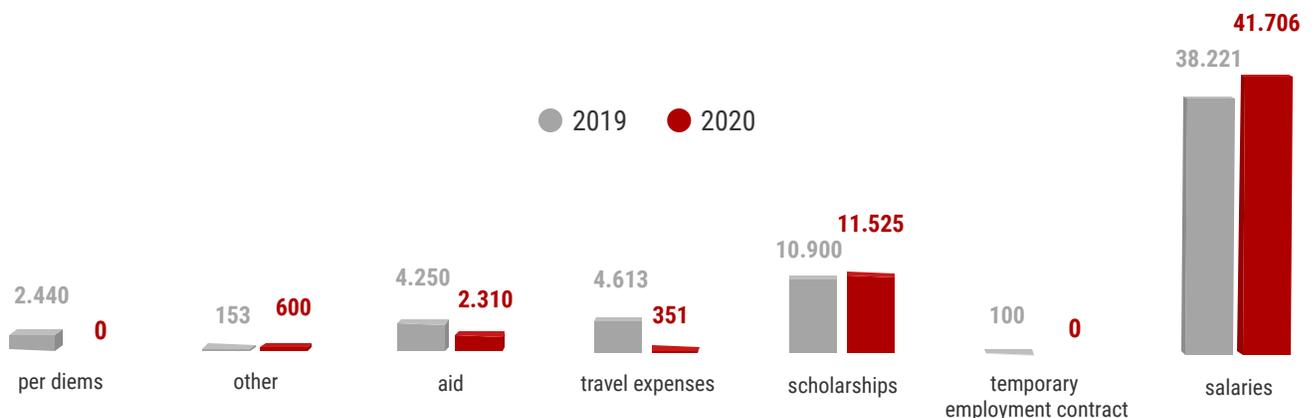
In the election year, the expenses of office supplies, equipment and overhead increased, transportation expenses also increased, while other expenses doubled.

Expenses of the regular operation, by categories (2019 and 2020)



Payments to natural persons. In the election year, the payments of scholarships and salaries of employees in the party increased, while other payments to natural persons were lower than in the previous year.

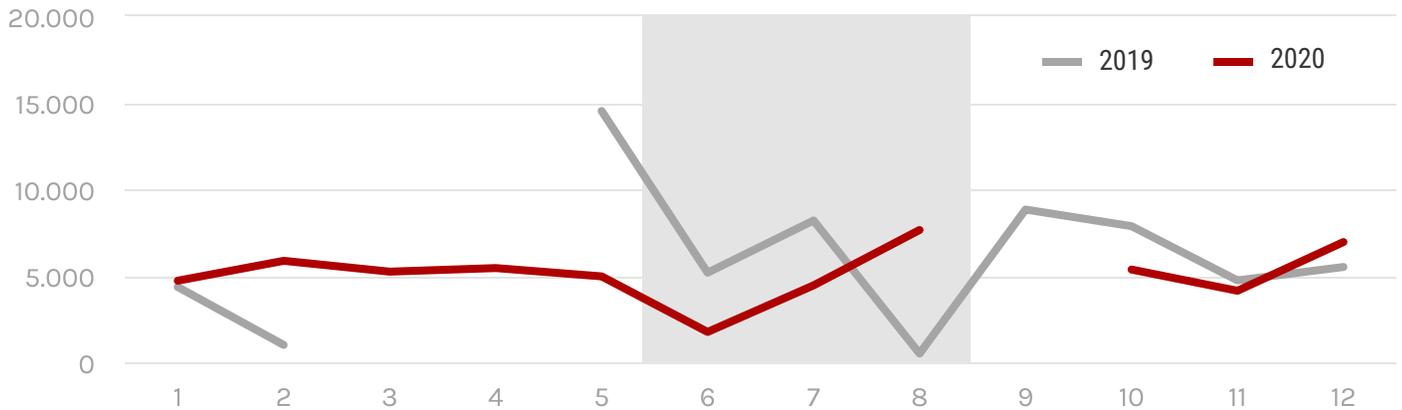
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



12.3.

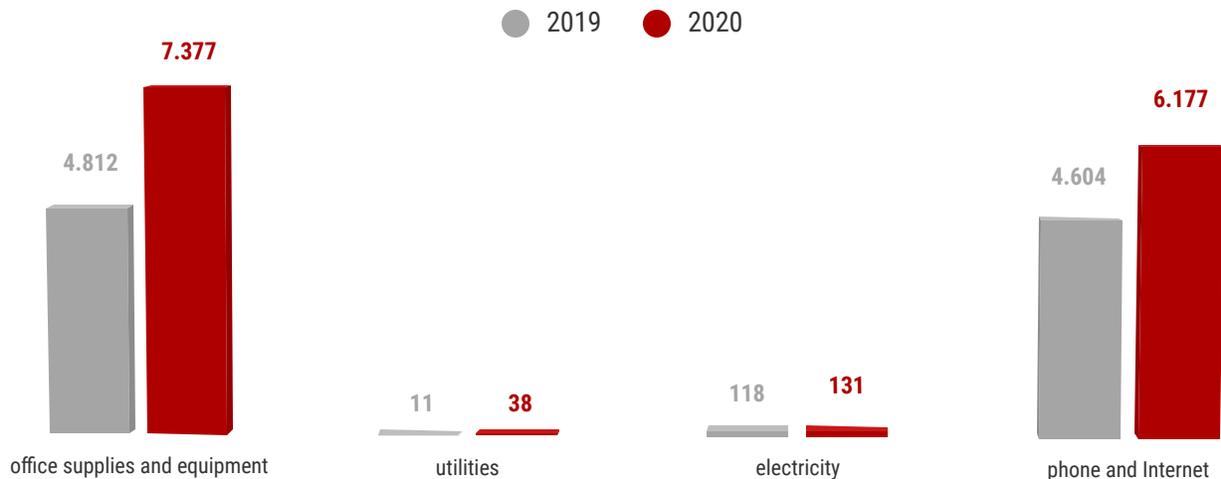
Total amount of funds paid by HGI to natural persons during the election campaign is the same as in the same period of 2019. However, the dynamics of spending of these funds is not the same. Thus, in the month when the elections were held, **15 times more money was paid to natural persons than in the same month of the previous year.**

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. In the election year, the expenses of office supplies and equipment increased, as well as phone and internet expenses.

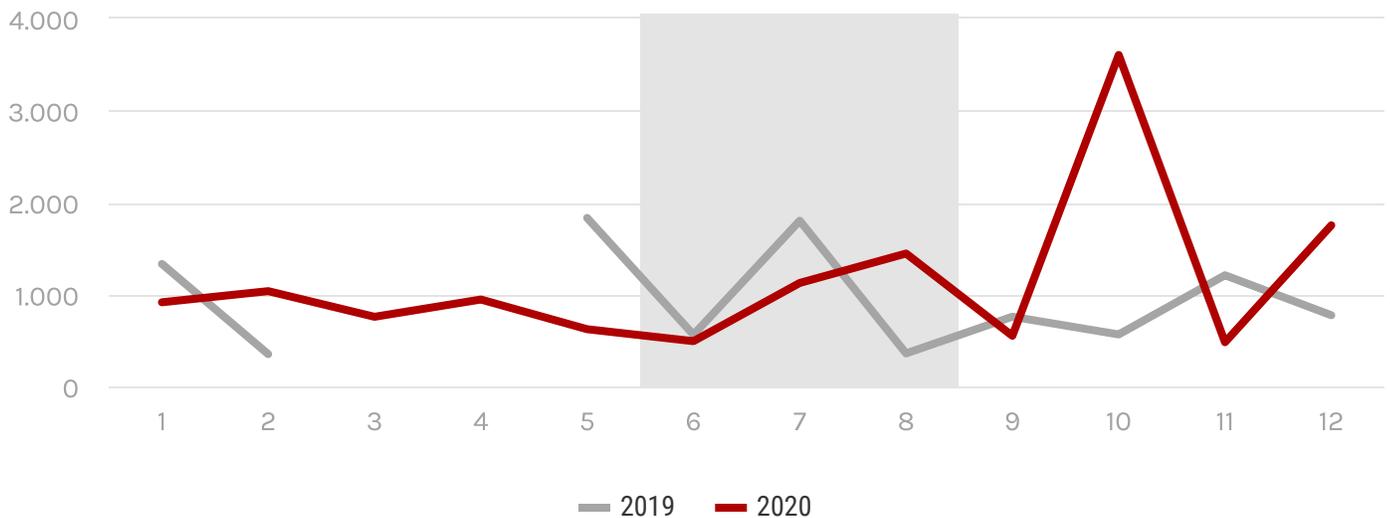
Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by types (2019 and 2020)



12.3.

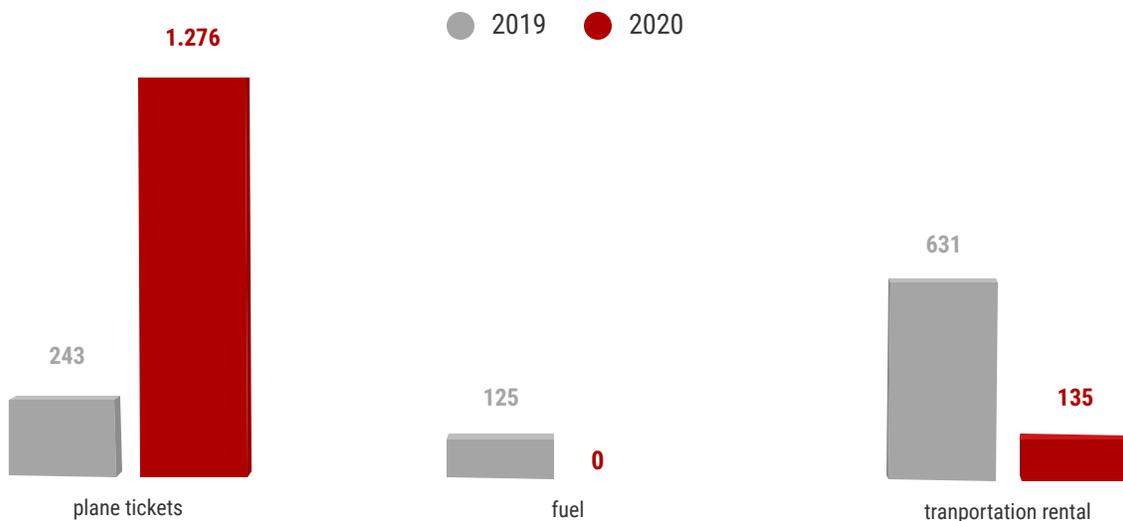
These expenses increased in August, mainly due to the purchase of equipment from the companies Confirm and Servis Commerce from Tivat, as well as due to the phone bill that was nearly doubled in July and August.

Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by months (2019 and 2020)



Transportation. In the election year, transportation expenses increased, and the increase is due to higher expenses due to purchase of plane tickets.

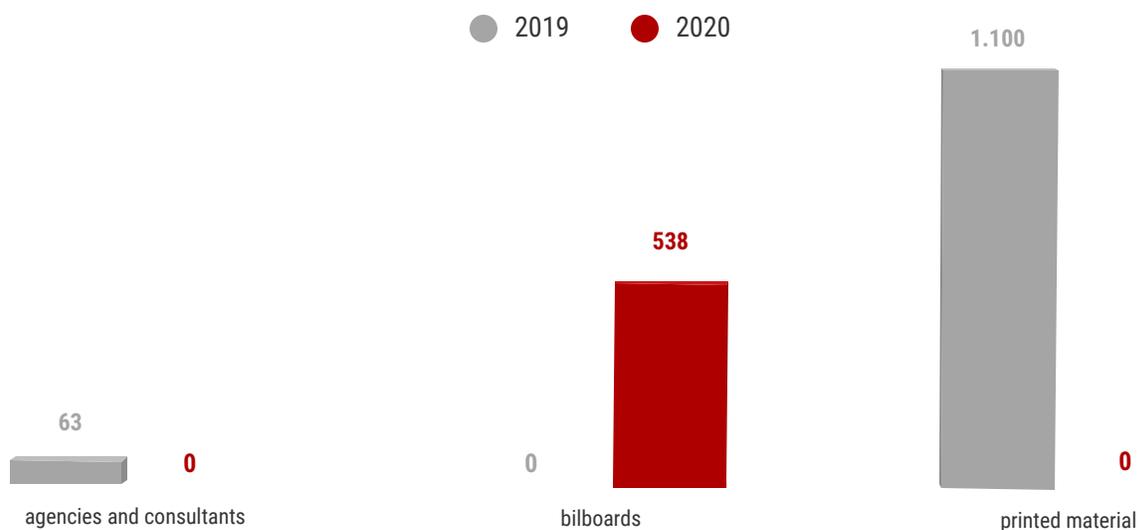
Transportation expenses from funds for financing the regular operation, by types (2019 and 2020)



12.3.

Promotional material. The expenses of promotional material did not increase during the election year, except for billboards that were published before the start of the election campaign.

Expenses of promotional material from funds for financing the regular operation, by types (2019 and 2020)



Advertising. In 2019 and 2020, HGI did not have advertising expenses that it financed from the funds for the regular operation of the party.

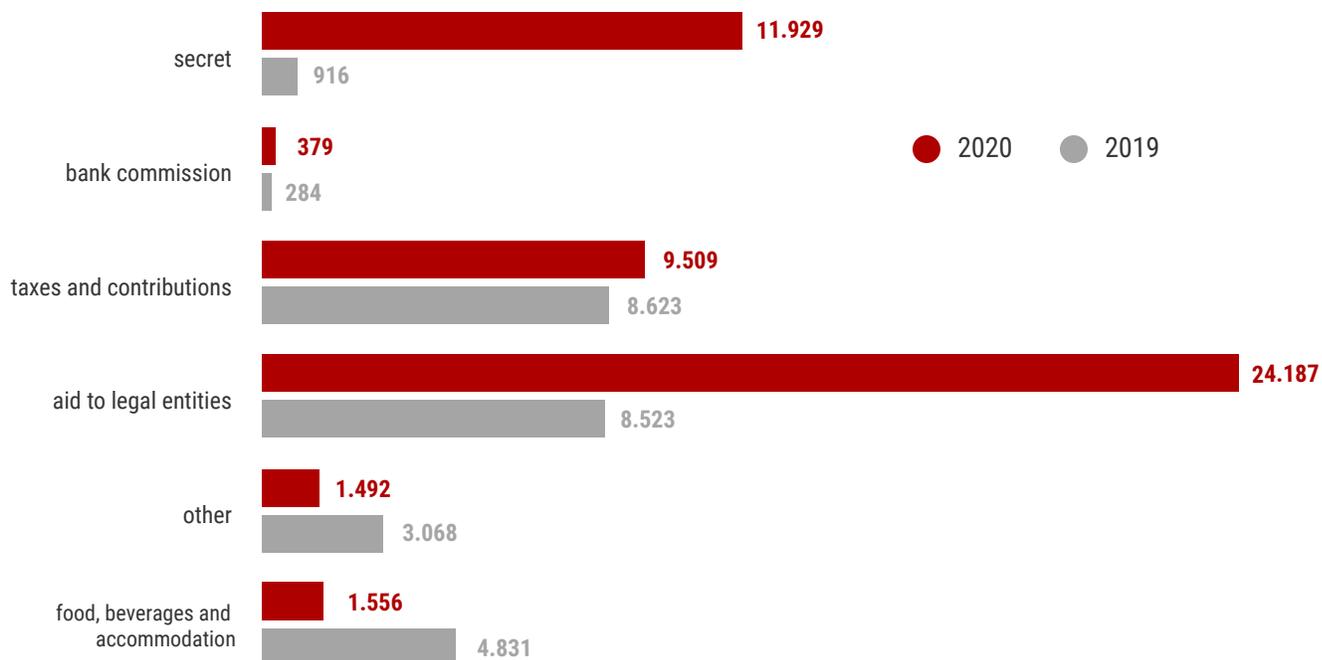
Other expenses. The amount of these expenses is twice as high in the election year than in the previous one, mostly due to higher payments of aid to legal entities, as well as payments from the treasury whose purpose is unknown.

During the election campaign, there were several payments from the treasury worth over eight thousand euros, for which it is not possible to determine the purpose. Of particular interest are the two cash payments of around three thousand euros from June and July 2020, for which the treasury did not state the purpose of spending.

Most of the payments to legal entities refer to the donation to the National Coordination Body for Communicable Diseases of 21 thousand euros, all of which were realized before the start of the election campaign.

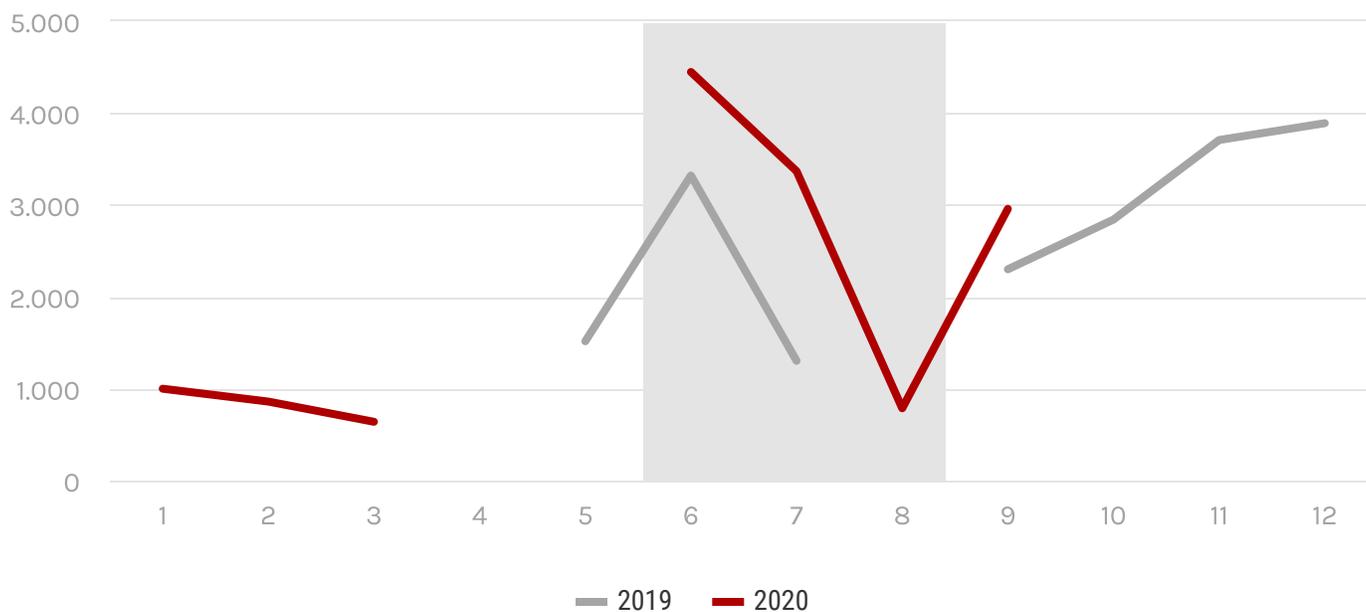
12.3.

Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



Cash money. During the election campaign, HGI withdrew twice as much cash than in the same period last year.

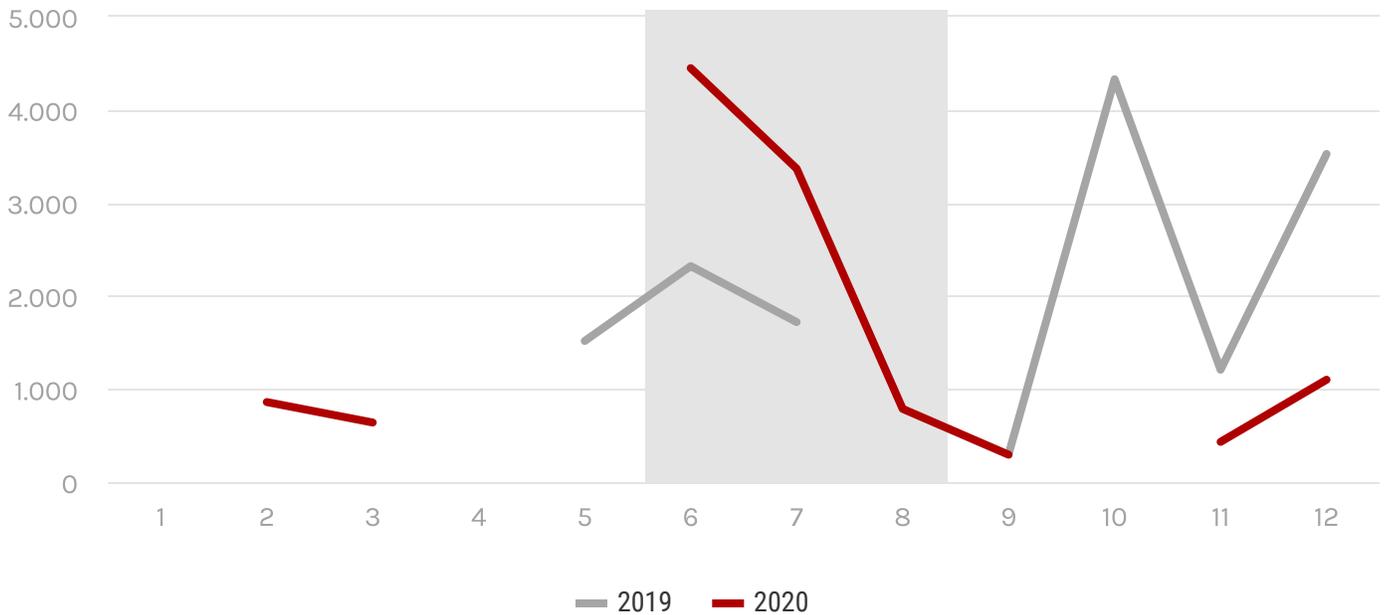
Dynamics of cash withdrawal from funds for financing the regular operation, by months (2019 and 2020)



12.3.

HGI spent at least twice as much cash during the election campaign than in the same period of the previous year.

Dynamics of cash consumption from funds for financing the regular operation, by months (2019 and 2020)



12.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

HGI paid all reported campaign expenses from the bank account opened for these purposes.

D.13.

Liberal Party (LP)

Liberal Party earned around 260 thousand euros in two years, and the official reports of that party state that it received around 100 thousand from the Democratic Party of Socialists.

LP is among transparent parties with an average score of 4.7.

During the election campaign, that party had higher expenses of financing the regular operation than in the same period of the previous year, as follows:



multiplied expenses of promotional material, especially billboards and hiring of marketing agencies,



increased payments based on temporary employment contracts and aid to natural persons,



multiplied advertising expenses on Facebook.

LP did not independently finance the parliamentary elections campaign, but participated within a coalition whose finances were managed by another party.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from the Liberal Party on inflows and outflows from eight accounts during 2019 and 2020: one head office account, one Women's Forum account, one foreign currency account, one business card, three accounts of the municipal boards in Kotor, Nikšić and Podgorica, one account for the local elections in Kotor. In addition, we were provided with data on consumption from the head office's treasury.

Transparency scores of financial operations

Total transparency score [100] of financing of LP is 4.7. The transparency score of the regular operation financing of that party is 4.72, while the transparency score of the election campaigns financing is 1.95.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	5.00	5.00	3.00
Head Office	all statements submitted complete data available for 100% of transactions	all statements submitted complete data available for 100% of transactions	all statements submitted complete data available for 100% of transactions	SAI has no data complete data available for 49% of transactions, cash withdrawal from the account coincides with 94% of the treasury inflows
	5.00	-	-	-
Women's Forum	all statements submitted, SAI has no data complete data available for 100% of transactions	no -	no -	no -
	5.00	-	-	0.00
Municipal boards	all statements submitted, SAI has no data complete data available for 94% of transactions	no -	no -	not submitted cash was withdrawn from the bank accounts of the three municipal boards, which accounts for 41% of the total payments of these boards
Transparency score of the regular operation financing				4.72

[100] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	<i>other party was in charge of the finances</i>			
	5.00	-	-	0.00
Kotor	all statements submitted	no	no	not submitted
	complete data available for 100% of transactions	-	-	cash was withdrawn from the bank account, which accounts for 61% of total payments from the local elections account
Budva	<i>other party was in charge of the finances</i>			
Tivat	<i>did not participate</i>			
Tuzi	<i>did not participate</i>			
Andrijevica	<i>did not participate</i>			
Gusinje	<i>other party was in charge of the finances</i>			
Transparency score of the election campaigns financing				1.95
Total transparency score of the party financing				4.7

What is missing?

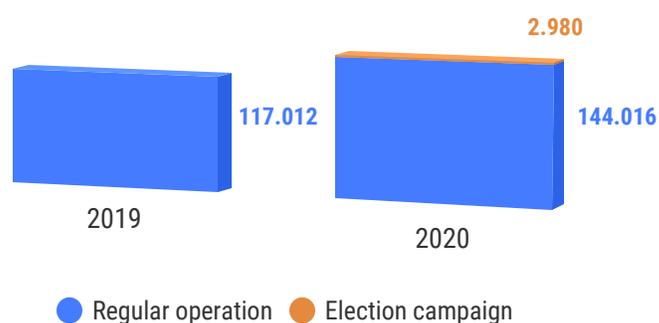
The treasuries of municipal boards in Kotor, Nikšić and Podgorica were not submitted to us, as well as treasuries for the local elections in Kotor. The Liberal Party independently participated in those local elections, while it either did not participate in the others, or was in a coalition with the Democratic Party of Socialists, i.e. the Bosniak Party. In the case of the head office treasury, which was submitted to us, there is no description of expenses, thus, it is impossible to classify them.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues published by the LP in 2019 were **around 117 thousand euros**, while in 2020, they amounted to **around 144 thousand euros**, and additional revenues for financing local election campaigns of less than three thousand euros.

Available revenues for financing the regular operation and election campaigns (2019 and 2020)

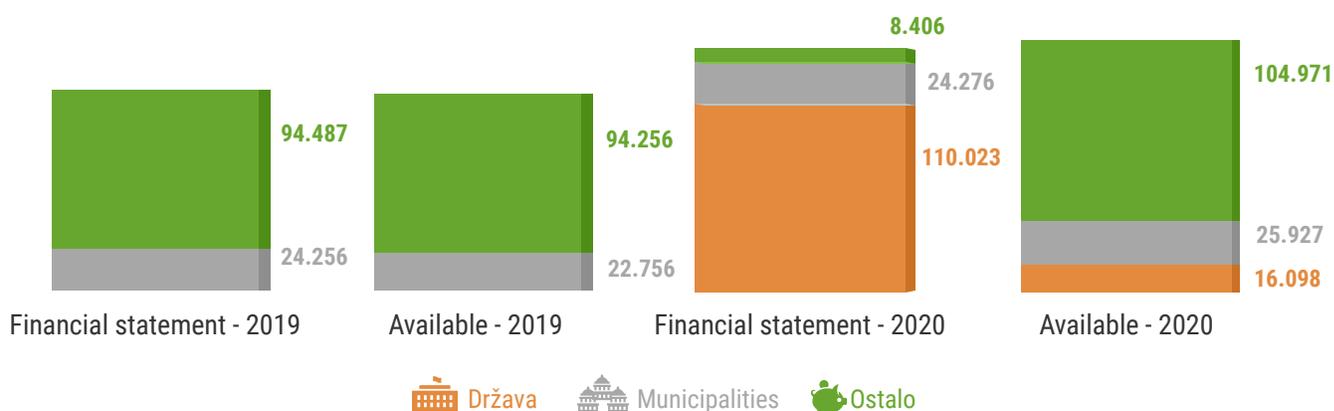


Comparison with financial statements

No audit of LP's financial statements was conducted in 2019 or 2020, thus, very brief financial statements are the only official data on their financial operations.

These reports state that the LP received significantly more funds from the state in 2020, while account statements show that these funds were paid by the DPS.

Comparison of data from financial statements on total revenues with available information from all available accounts in 2019 and 2020



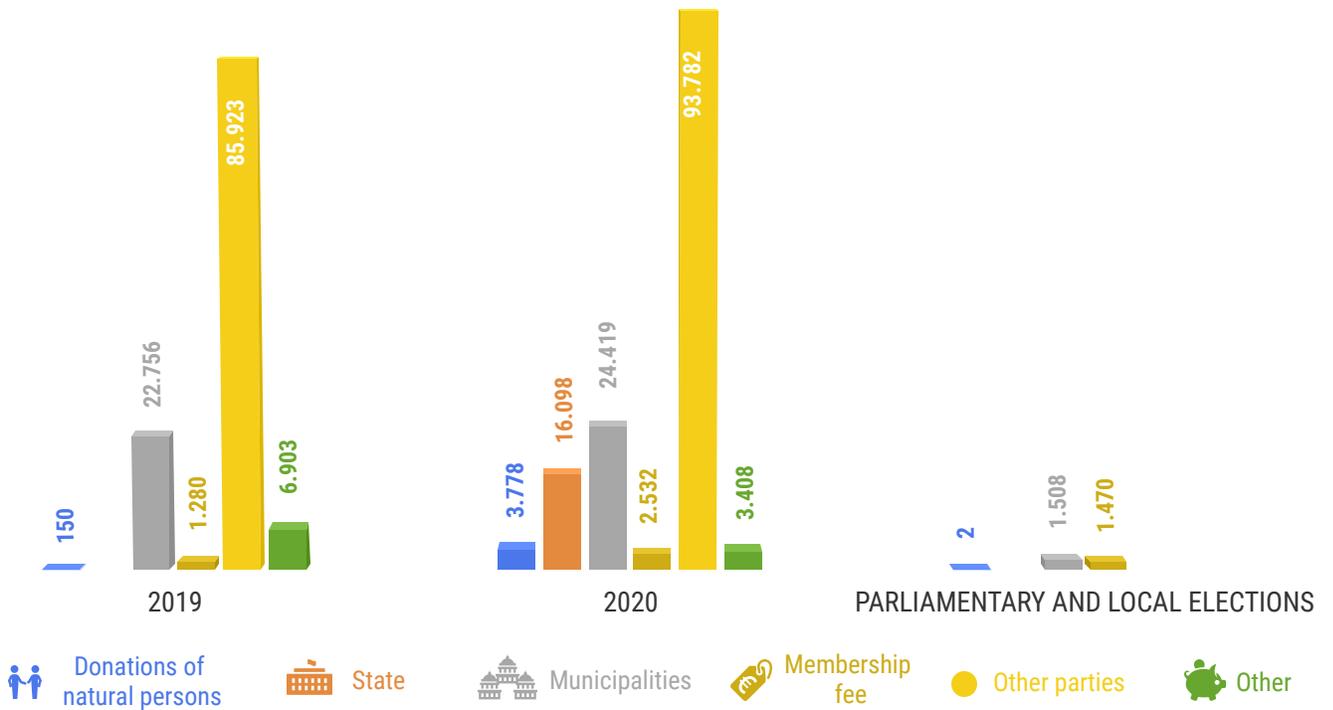
13.2.

Revenue sources

Unlike other parties, LP received most of the funds from the Democratic Party of Socialists, which was their coalition partner in the parliamentary elections.

Municipal budgets are also a significant source of funding, and the amount of payments is similar in both years. Much less significant sources of funding are membership fees and donations from natural persons, which were slightly higher during the election year.

Revenue sources in 2019 and 2020

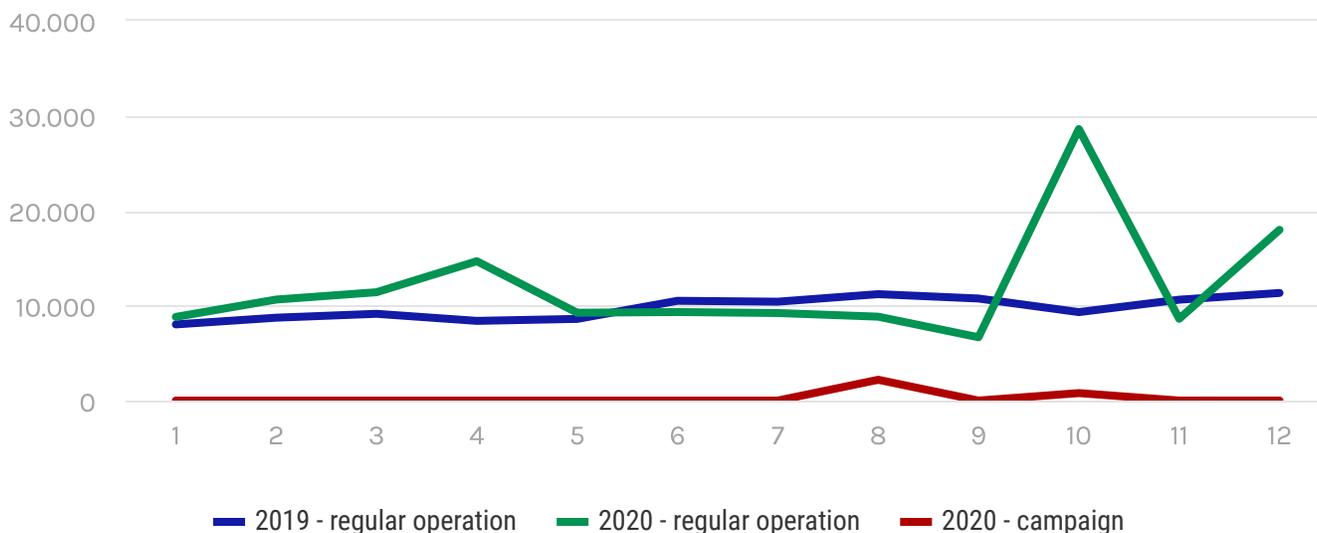


13.2.

Average monthly revenues and payment dynamics

In 2019 and 2020, average monthly revenues of LP were around 10 thousand euros. In October 2020, there was a large increase in revenues due to the payment of the Democratic Party of Socialists from the account for financing the parliamentary elections campaign.

All available revenues by months (2019 and 2020)



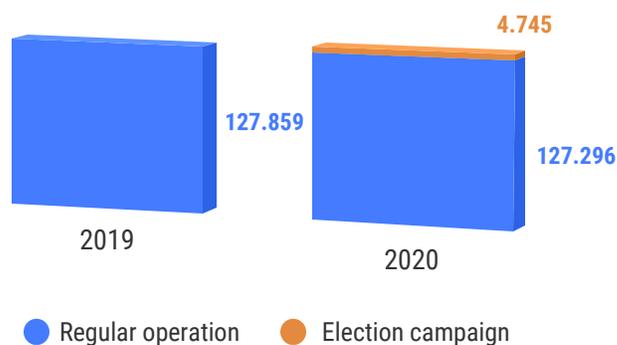
13.3.

ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

Available expenses of LP were **around 130 thousand euros** in 2019, **around 130 thousand euros** in 2020, as well as an additional nearly five thousand of campaign costs for local elections.

Available expenses of regular operation and election campaigns (2019 and 2020)

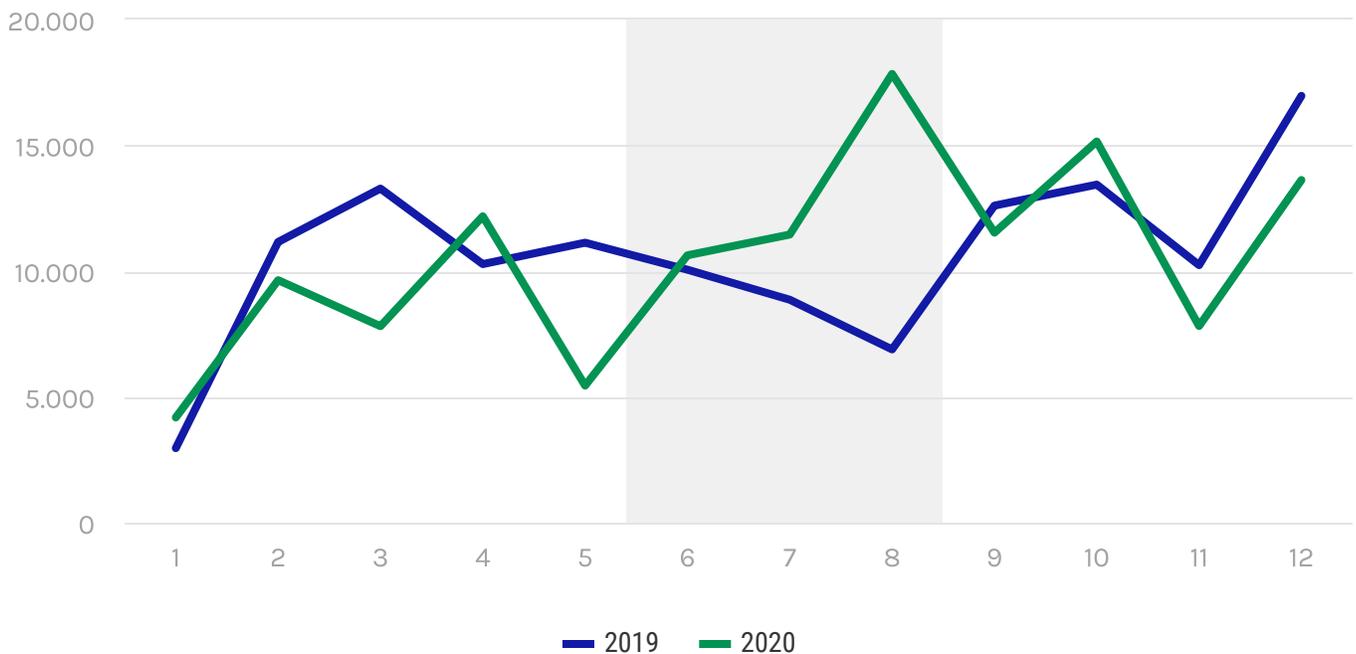


13.3.

Monthly expenses

In July, and especially in August 2020, the month when the elections were held, there was a significant increase in expenses.

Expenses of financing the regular operation, by months (2019 and 2020)

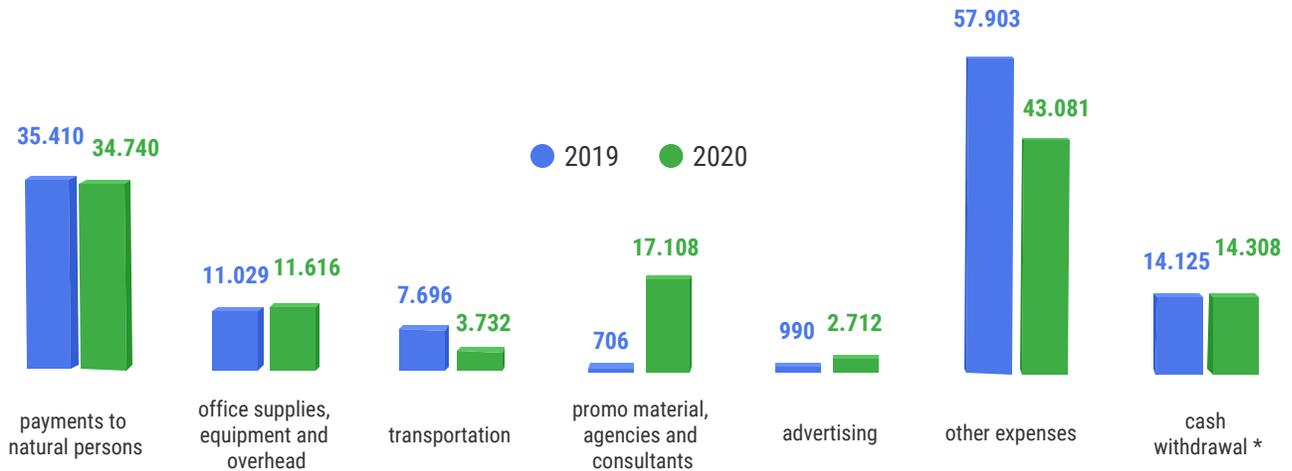


Which expenses of regular operation increased in the election year and during the election campaign?

In the election year, the expenses of promotional material and consulting agencies increased. Since LP did not provide us with data on the spending of treasuries of the municipal boards, the cash withdrawal for the needs of those funds is shown as a separate category in the chart below. Cash withdrawal for the needs of the treasury of the head office, which was submitted to us, is categorized as an intra-party payment, and then the expenses from that cash treasury are shown by corresponding categories.

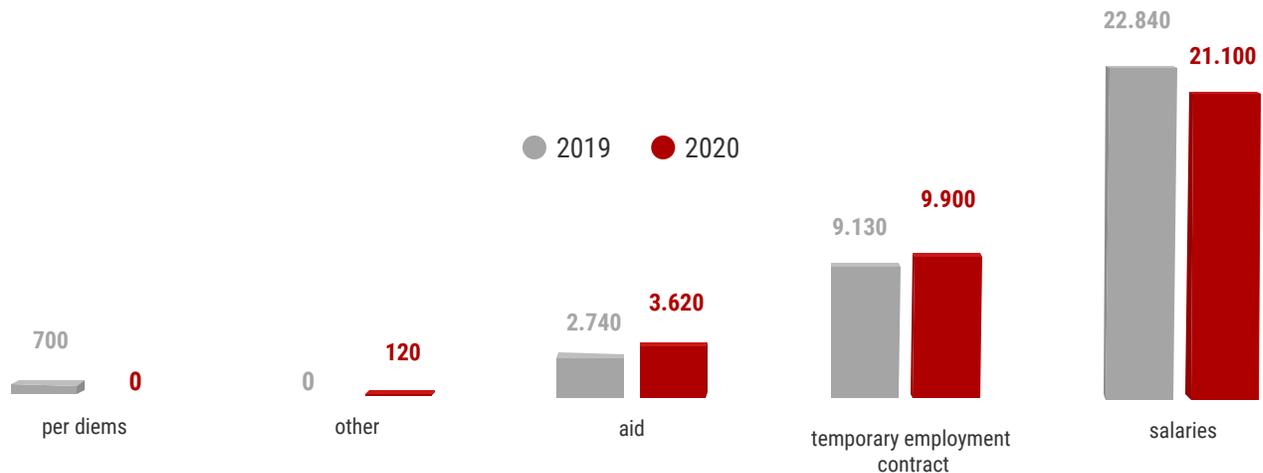
13.3.

Expenses of regular operation, by categories (2019 and 2020)



Payments to natural persons. In the election year, the payment of aid to natural persons slightly increased, as well as payments based on temporary employment contracts.

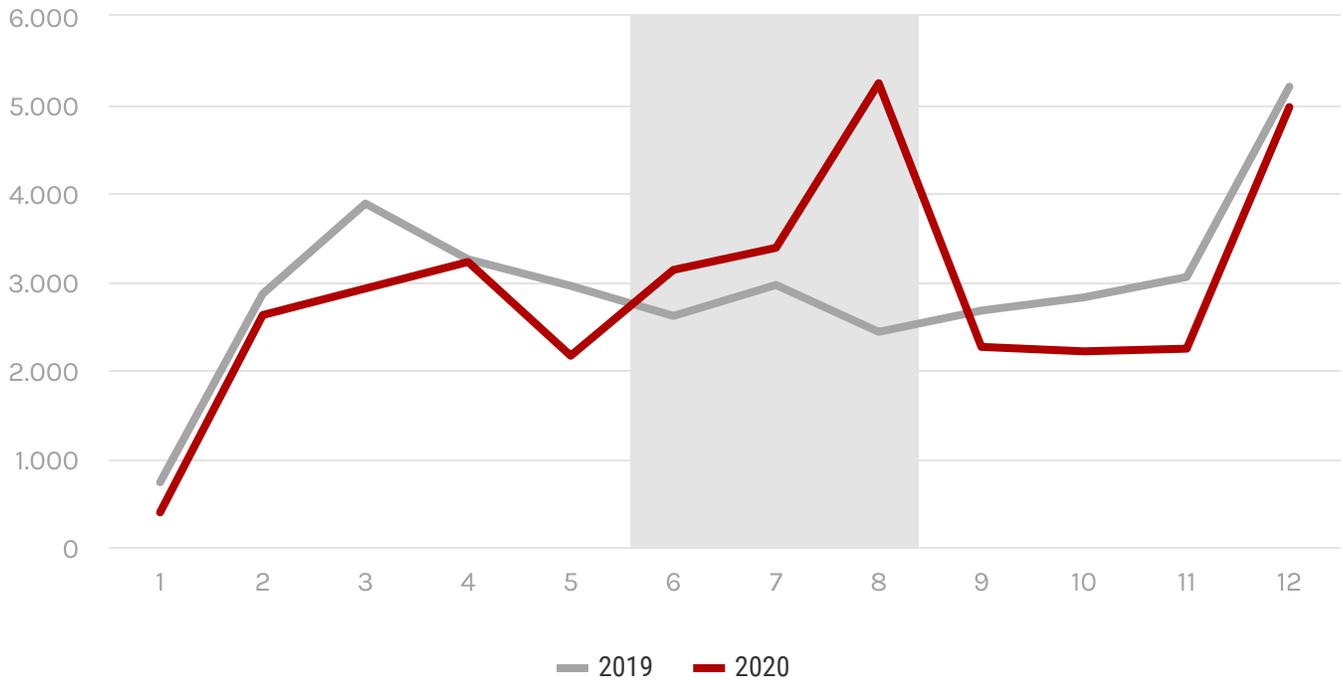
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



In the first half of the election year, the amounts of payments to **natural persons were lower, their amount increased in June and July, and especially in August 2020**, compared to the same period of the previous year. **This increase is due to higher payments under temporary employment contracts, as well as aid to natural persons.**

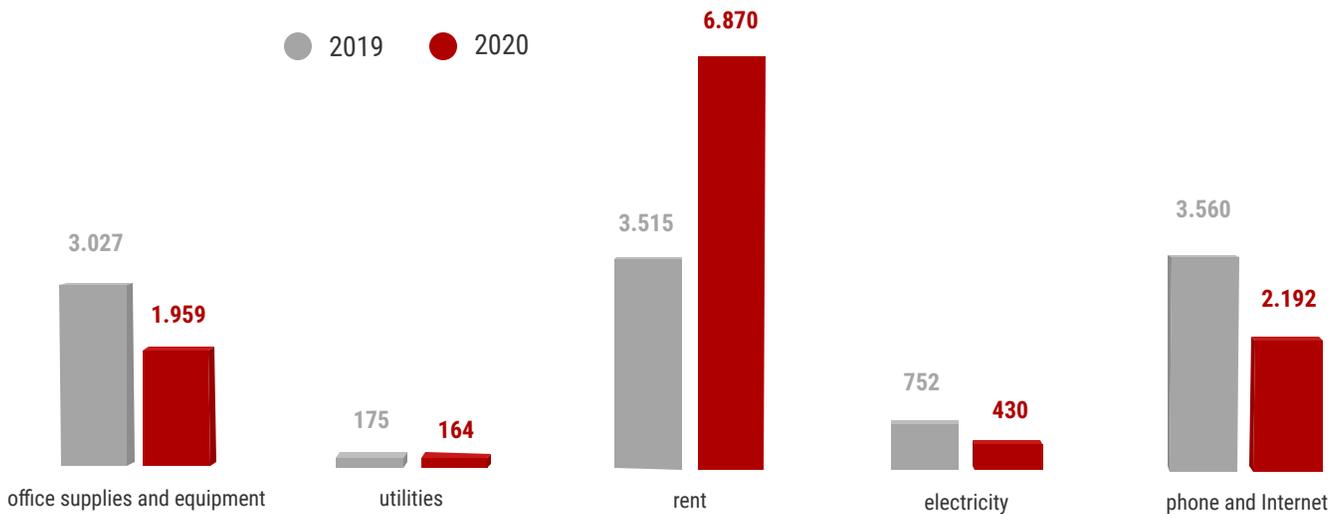
13.3.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. In the election year, the expenses of rent increased.

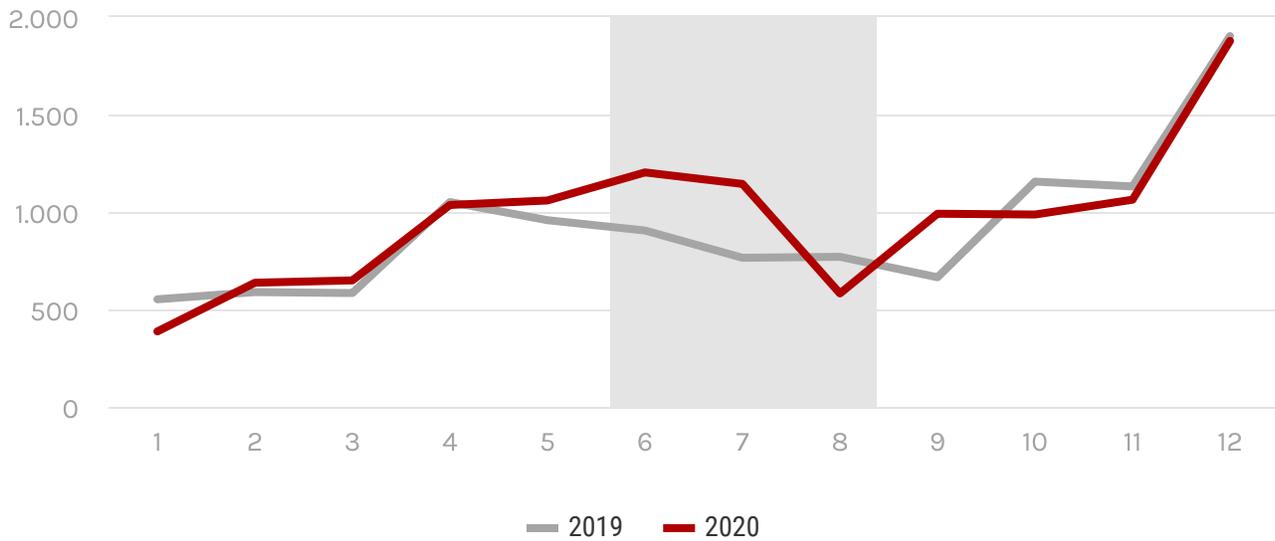
Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by types (2019 and 2020)



Rent expenses paid to natural persons were three times higher in June 2020 than in the same month of the previous year. In June and July, the expenses of office supplies were slightly higher.

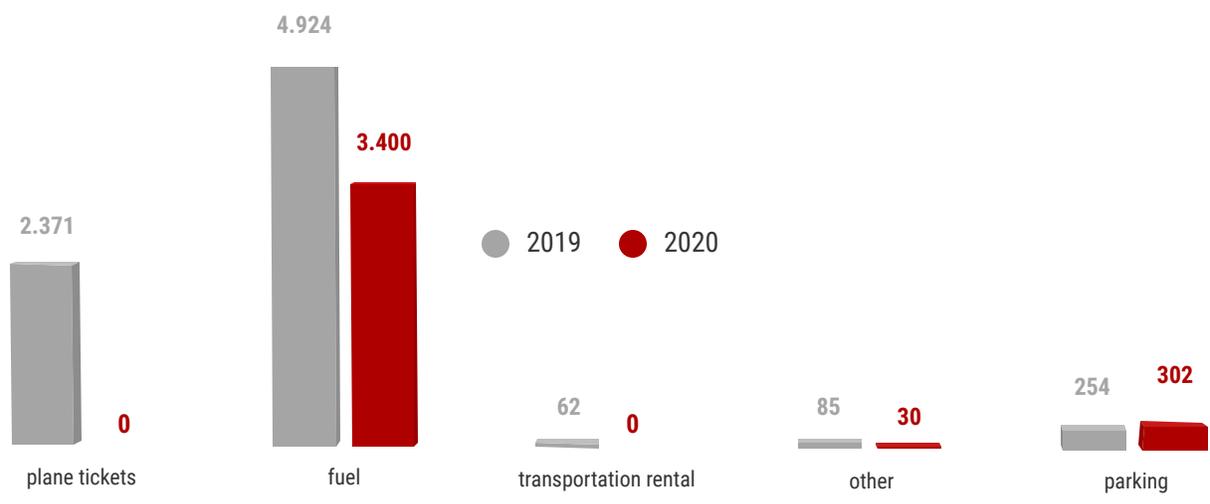
13.3.

Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by months (2019 and 2020)



Transportation. Transportation expenses are lower in the election year than in the previous year, as is the case with monthly consumption.

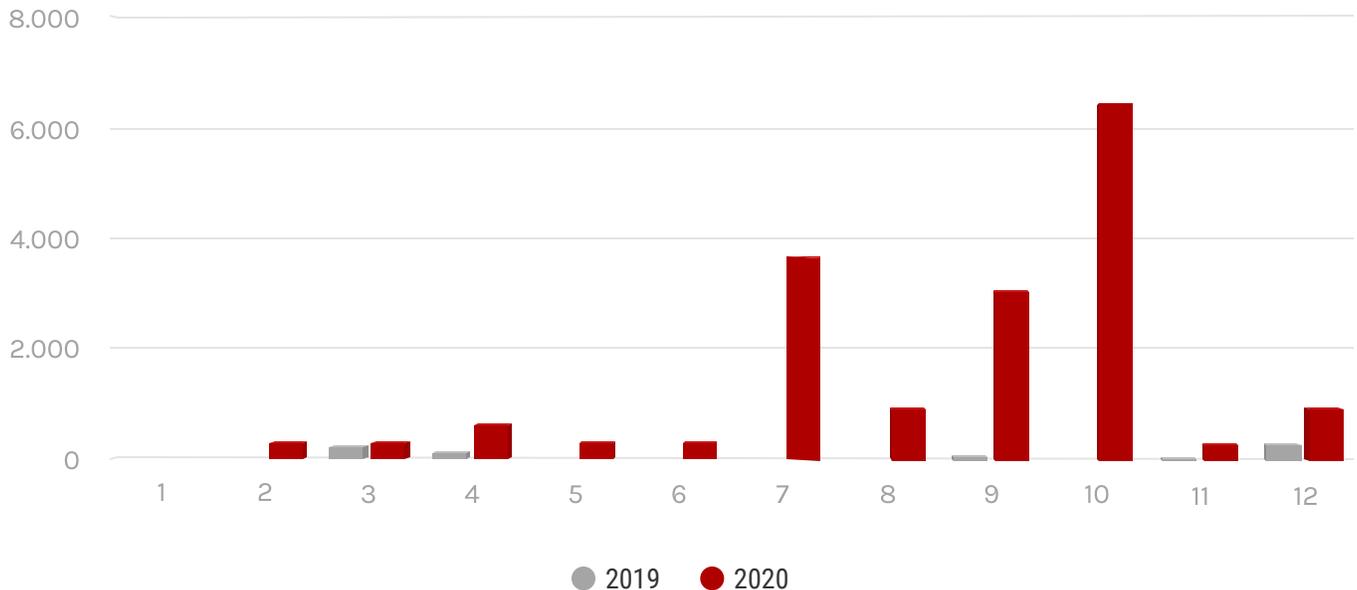
Expenses of transportation from the funds for financing the regular operation, by types (2019 and 2020)



Promotional materials. In the election year, there was a sharp increase in the promotional material expenses and the hiring of agencies. In July 2020, these expenses are higher due to the publication of billboards. During the entire election year, the Arhimed Agency was hired to collect data from the media.

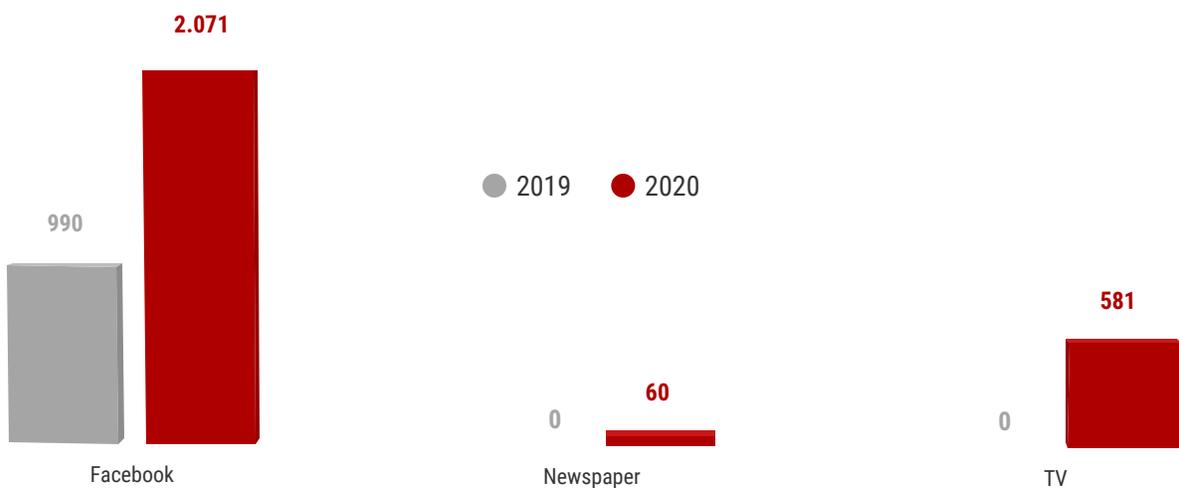
13.3.

Expenses of promotional materials from the funds for financing the regular operation, by months (2019 and 2020)



Advertising. Expenses of advertising on Facebook doubled in the election year.

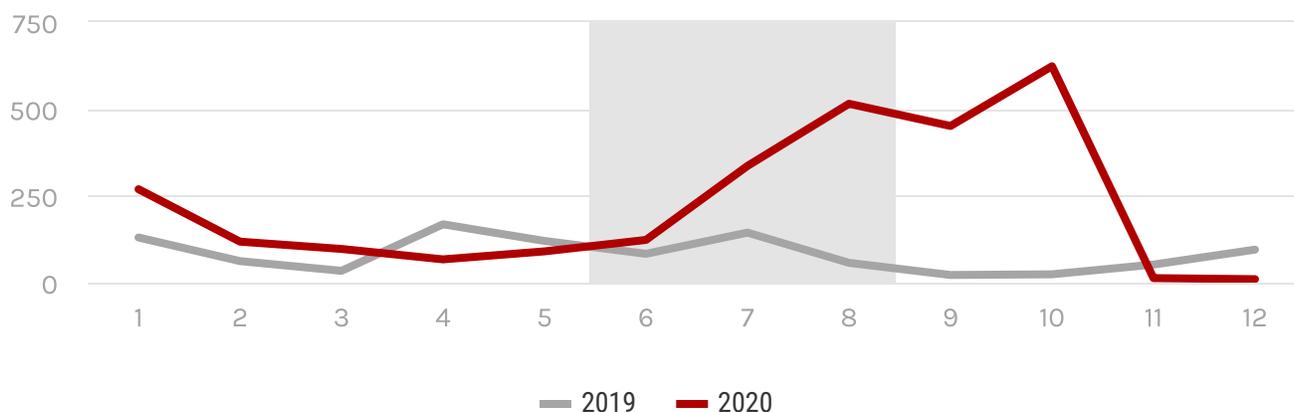
Advertising expenses from the funds for financing the regular operation, by types (2019 and 2020)



In July and August 2020, there is a multiple increase in advertising expenses compared to the previous year. These are advertisements on the social-networking website Facebook, for which nine times more funds were paid in August 2020 than in the previous year.

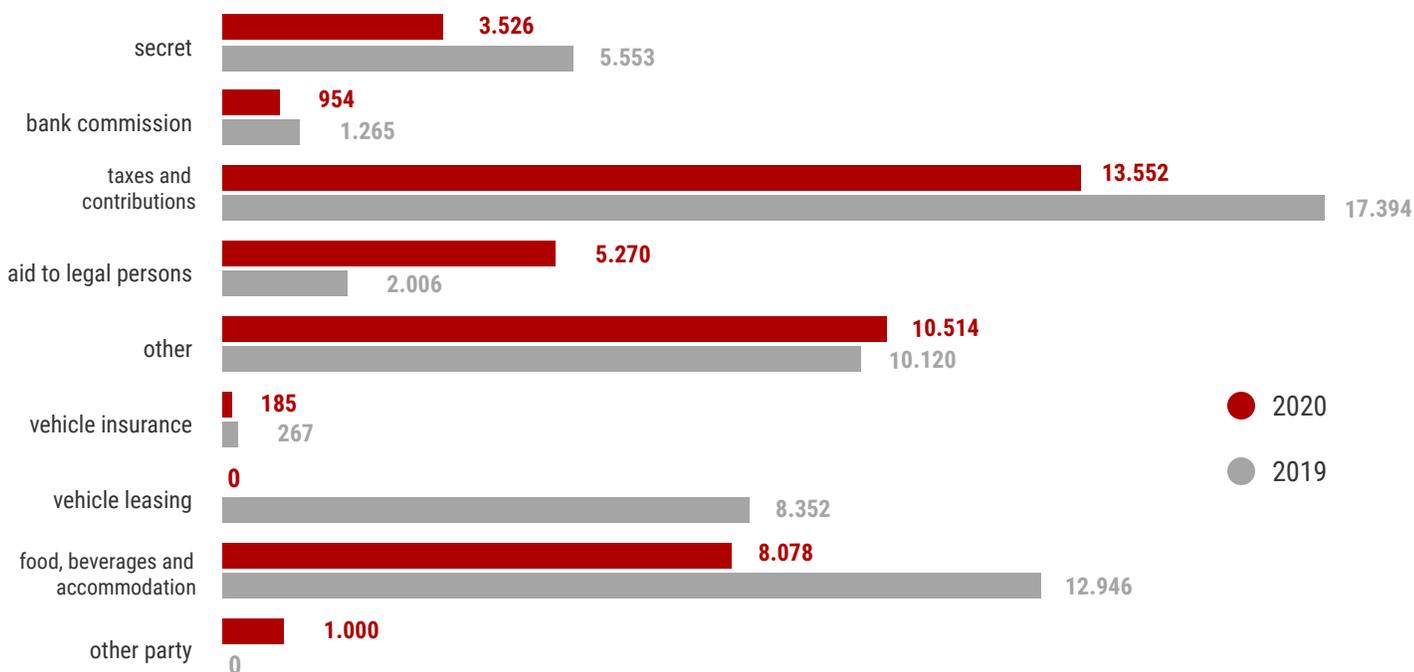
13.3.

Advertising expenses from the funds for financing the regular operation, by months (2019 and 2020)



Other expenses. In the election year, the payment of aid to legal entities increased, mainly NGOs and sports associations. However, that increase did not occur during the election campaign.

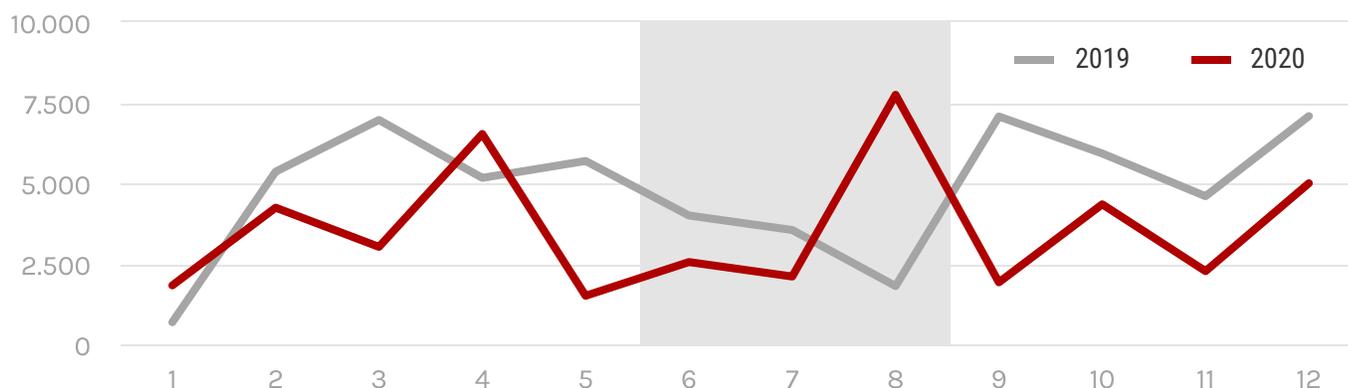
Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



In August 2020, other expenses were over four times higher than in the same month of the previous year. The increase was due to the payment of one thousand euros to the Bosniak Party with which the LP participated in the elections, and in that month funds were also paid on the basis of the LP's international cooperation. However, **in August, twice as much money was spent on food and beverages than in the same month of 2019.**

13.3.

Other expenses from funds for financing the regular operation, by months (2019 and 2020)



Cash money. The data on cash withdrawal from the treasury are unreliable, while LP did not provide us with the treasuries of the municipal boards, nor the treasury for local elections in Kotor.

When taking into account the data from the head office's treasury, as well as outflows from available accounts to the treasuries that were not submitted to us, less cash was withdrawn in the election year than in the previous year. However, in August 2020, the month when the elections were held, nearly three times more cash was withdrawn than in the same month of the previous year.

Dynamics of cash consumption from the funds for financing the regular operation, by months (2019 and 2020)



13.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

LP was not in charge of the finances for the parliamentary elections campaign.

D.14.

Albanian Alternative (AA)

In two years, Albanian Alternative had official revenues of nearly 200,000 euros, and almost the entire amount was paid from the state and municipal budgets.

That party is among transparent parties with an average score of 4.48.

AA increased the expenses of financing the regular operation during the election campaign compared to the same period of the previous year, as follows:



over ten times higher payments to natural persons, mainly on the basis of temporary employment contracts,



four times higher rent expenses,



increase in fuel expenses,



multiple increase in the expenses of making promotional materials in July.

By the end of 2021, this party did not pay over three thousand euros from any available account for the expenses of producing promotional material for the parliamentary elections.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Based on the Law on Free Access to Information, we received data from AA on inflows and outflows from three bank accounts during 2019 and 2020: the head office account, the Women's Forum account, and the account for financing the parliamentary elections campaign.

Transparency scores of financial operations

Total transparency score [101] of financing of AA is 4.48. The transparency score of the regular operation financing of that party is 4.9, while the transparency score of the election campaigns financing is 4.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	-	-	0.00
Head office	all statements submitted, SAI has no data	no	no	no treasury for 2019 submitted
	complete data available for 100% of transactions	-	-	-
	5.00	-	-	-
Women's Forum	all statements submitted, SAI has no data	no	no	no
	complete data available for 100% of transactions	-	-	-
	-	-	-	-
Municipal boards	no bank accounts	no	no	no
	-	-	-	-
Transparency score of the regular operation financing				4.90

[101] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	-	-	-
2020 Elections	all statements submitted	no	no	no
	complete data available for 100% of transactions	-	-	-
Kotor	<i>did not participate</i>	-	-	-
Budva	<i>did not participate</i>	-	-	-
Tivat	<i>did not participate</i>	-	-	-
Tuzi	0.00	-	-	-
	no data submitted	no	no	no
Andrijevisa	<i>did not participate</i>	-	-	-
Gusinja	<i>other party from the coalition was in charge of the finances</i>			
Transparency score of the election campaigns financing				4.00

Total transparency score of the party financing

4.48

What is missing?

AA did not provide us with data on spending from the account for financing the election campaign in Tuzi.

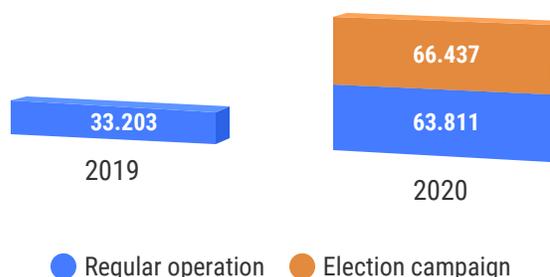
This party did not submit data on the treasury of the head office, although it existed at least in 2019, when it generated two thousand euros in income from donations of one natural person that were not recorded through the account.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

In 2019, Albanian Alternative had **over 30 thousand euros** in revenues, they **doubled** in 2020, and additional funds of around 66 thousand euros were provided to finance the election campaign.

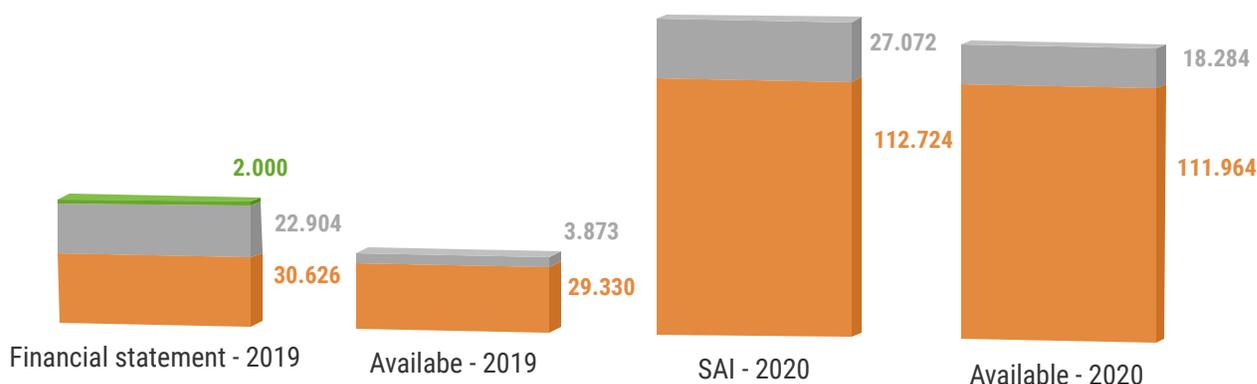
Available revenues for financing the regular operation and election campaigns (2019 and 2020)



Comparison with auditor's data and financial statements

Greatest differences in the available data in relation to the information from the financial statements refer to calculated but uncollected funds from the budgets of local self-governments. However, as it was previously pointed out, in 2019, AA received a donation from a natural person that was not recorded in available accounts, while the treasury data was not submitted to us.

Comparison of SAI data and financial statements on total revenues with available information from all available accounts in 2019 and 2020



Država



Municipalities

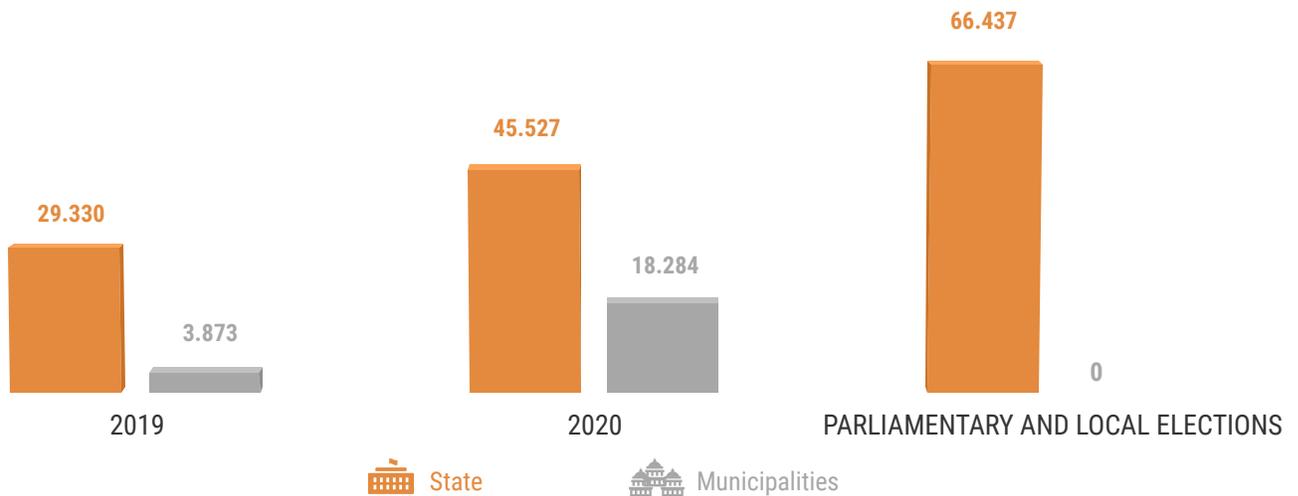


Ostalo

Revenue sources

AA has two sources of revenue: state budget, as the dominant one, and funds from the budgets of local self-governments, which multiplied in 2020.

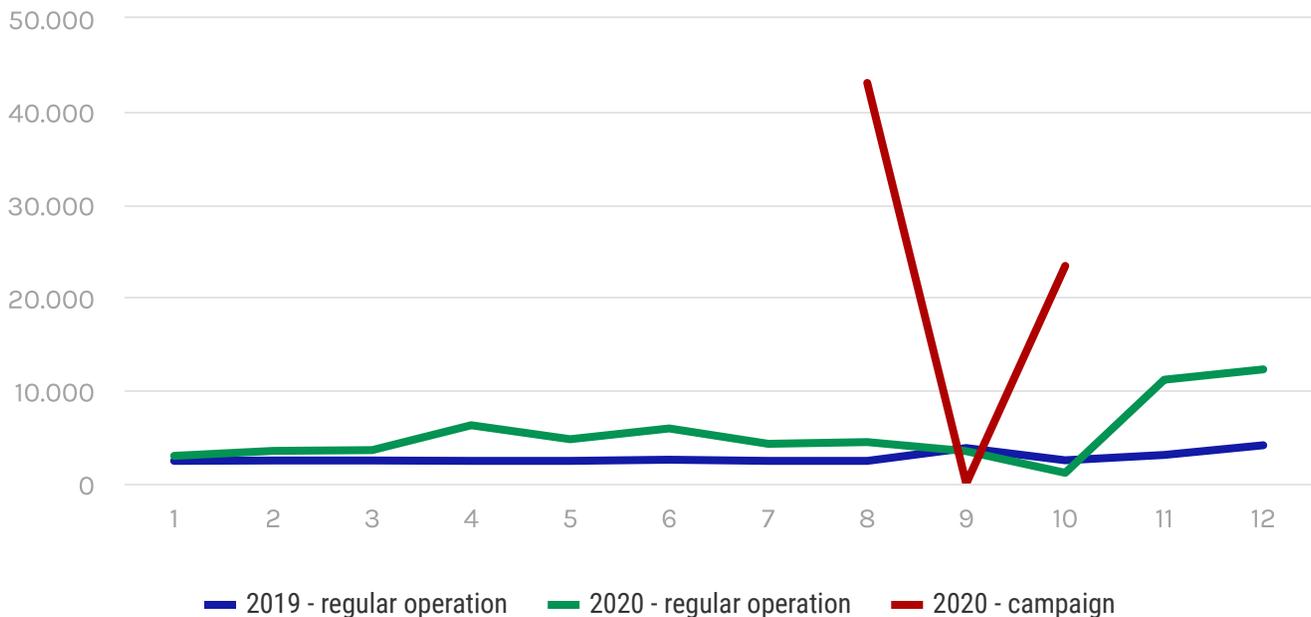
Revenue sources in 2019 and 2020



Average monthly revenues and payment dynamics

In 2019, the average monthly revenues of AA were around 2.5 thousand euros, and in 2020, they were around 4 thousand until a significant increase at the end of the year.

All available revenues by months (2019 and 2020)



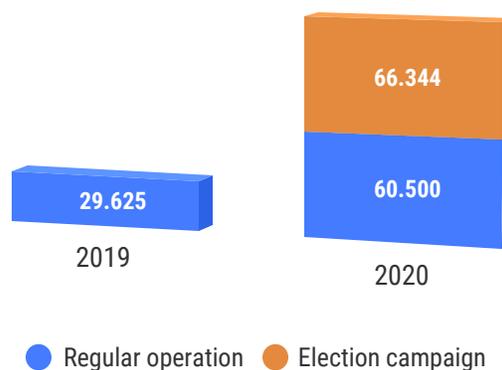
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

In 2019, AA paid the total expenses of regular operation of **around 30 thousand euros** from the submitted bank accounts, and they were **doubled** in the following year.

In 2020, the party had additional election campaign expenses of around 66,000 euros.

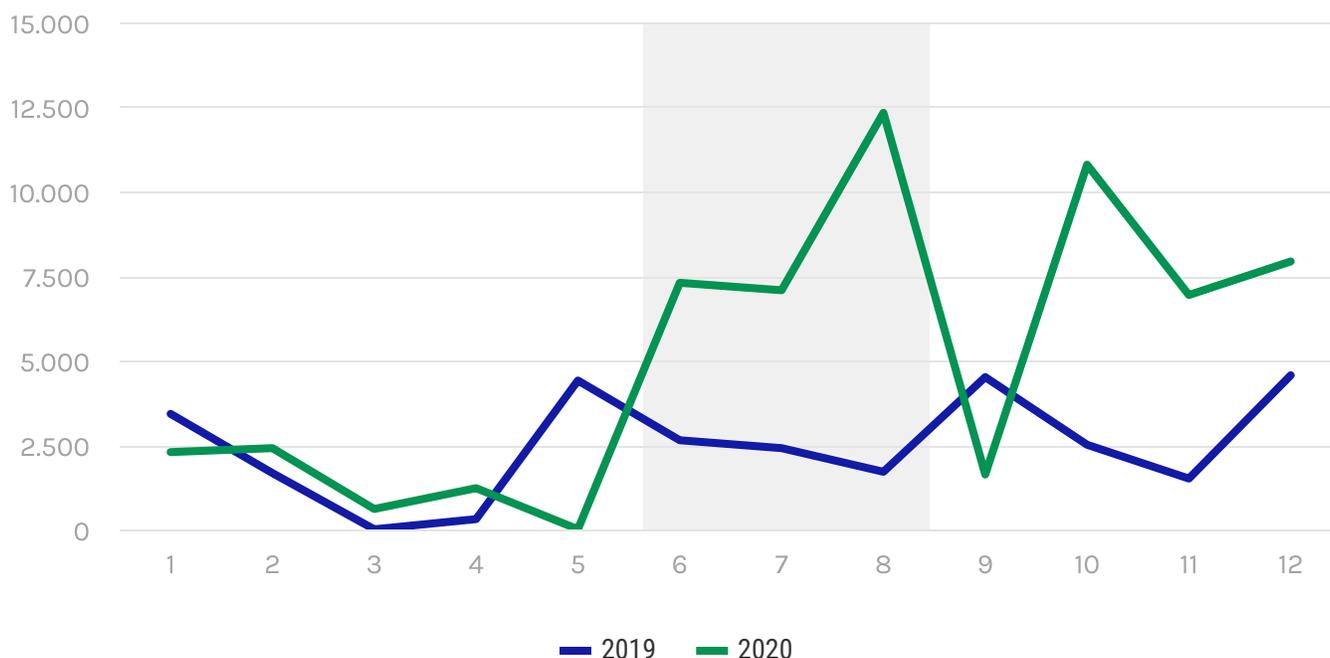
Available expenses of regular operation and election campaigns (2019 and 2020)



Monthly expenses

In June and July 2020, AA had twice the expenses of regular operation than in the same period of the previous year, while in August, the month when the elections were held, those expenses were seven times higher than in the same period of 2019.

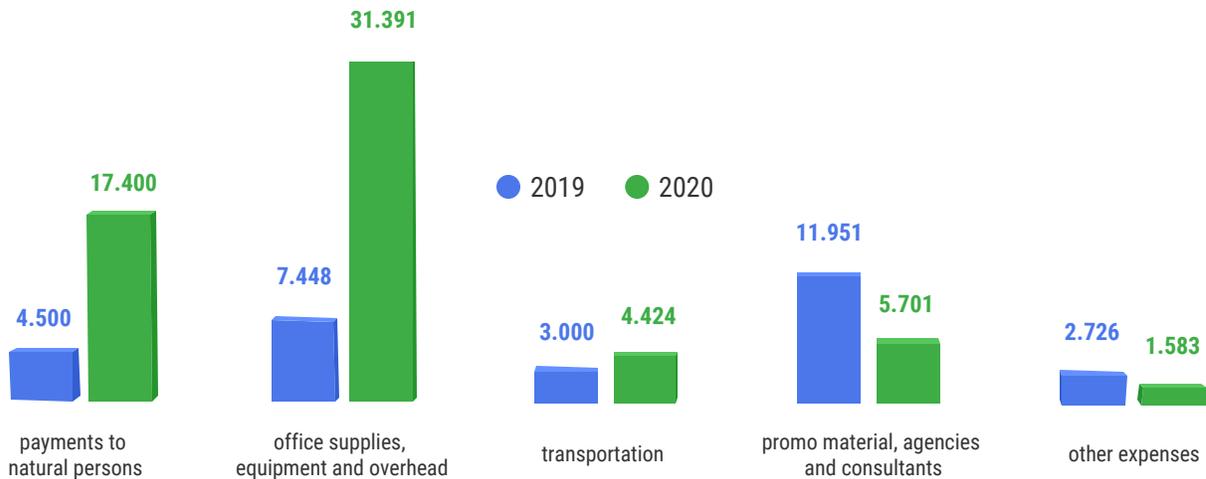
Expenses of financing the regular operation, by months (2019 and 2020)



Which expenses of regular operation increased in the election year and during the election campaign?

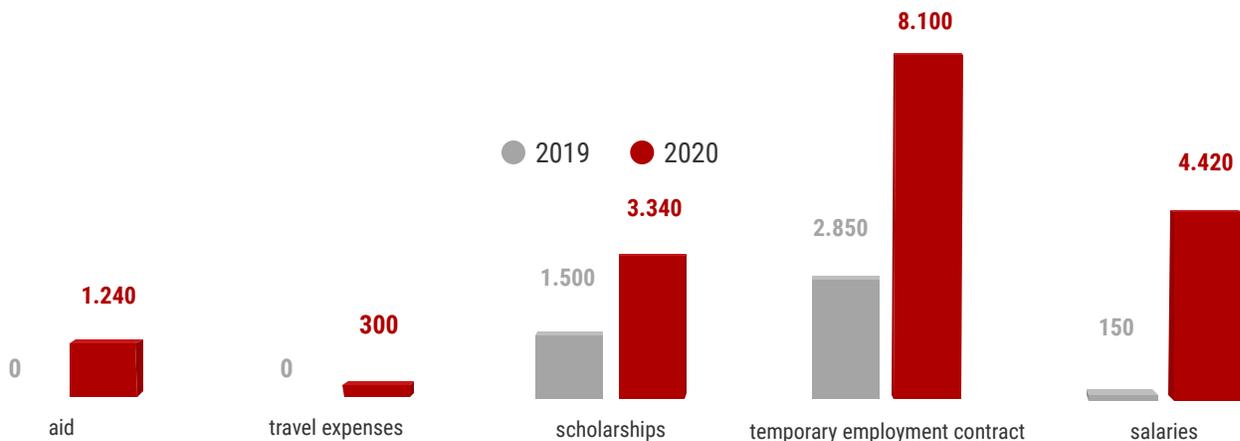
In the election year, payments to natural persons are nearly four times higher, and so is the increase in the expenses of office supplies, equipment and overhead. There was also a slight increase in transportation expenses, while other expenses declined.

Expenses of the regular operation, by categories (2019 and 2020)



Payments to natural persons. All types of payments to natural persons increased in the election year, particularly temporary employment contracts and salaries.

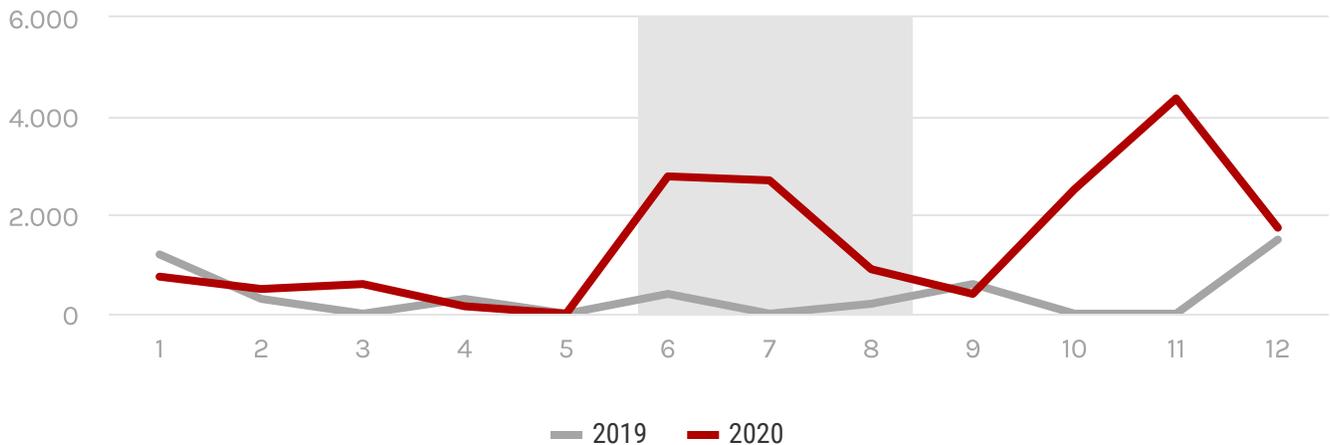
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



14.3.

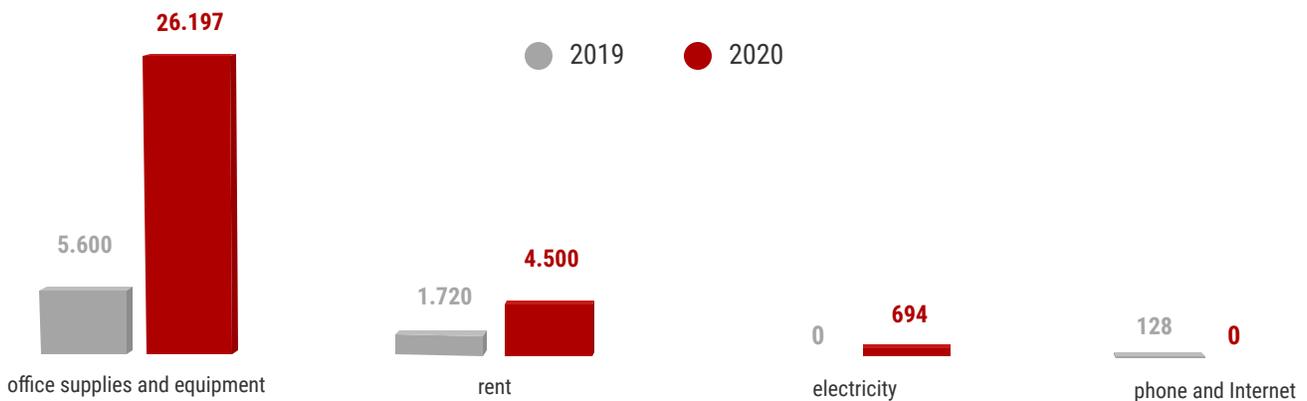
During the election campaign, payments to natural persons from the funds for financing the regular operation increased more than 10 times. They decreased after the elections, then increased in November and decreased again in the last month of 2020. In addition, in August of that year, significant funds were paid to natural persons from the funds allocated for financing the election campaign.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. The expenses of office supplies and equipment are more than four times higher in the election year, while the expenses of rent tripled.

Expenses of office supplies, equipment and overhead from the funds for financing the regular operation, by types (2019 and 2020)



A significant increase in the expenses of office supplies and equipment occurred mainly due to payments to a company Elektromass Mne, nearly 10 thousand euros in August, and over five thousand in December 2020. The company deals with lighting and installing of electrical wiring and video surveillance systems.

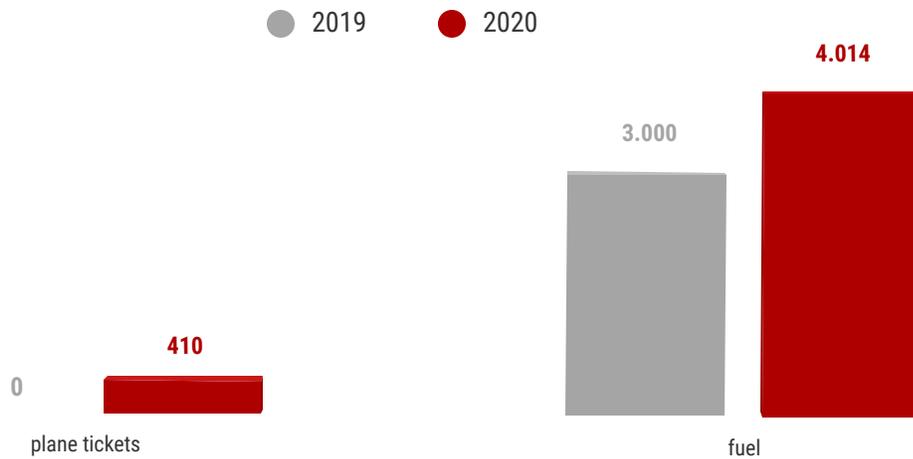
14.3.

In addition, after the election campaign, in October 2020, nearly eight thousand euros was paid to the company Conect mobile.

Rent expenses are four times higher in June 2020 than in the same month of the previous year.

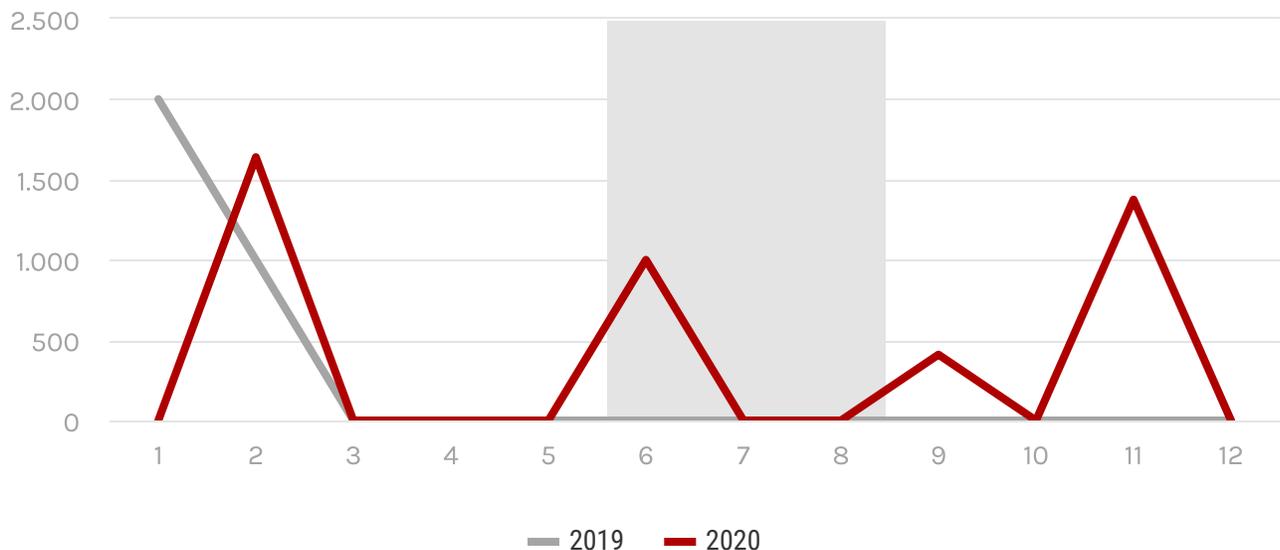
Transportation. Transportation expenses are around one thousand euros higher in the election year than in the previous one.

Transportation expenses from funds for financing the regular operation, by types (2019 and 2020)



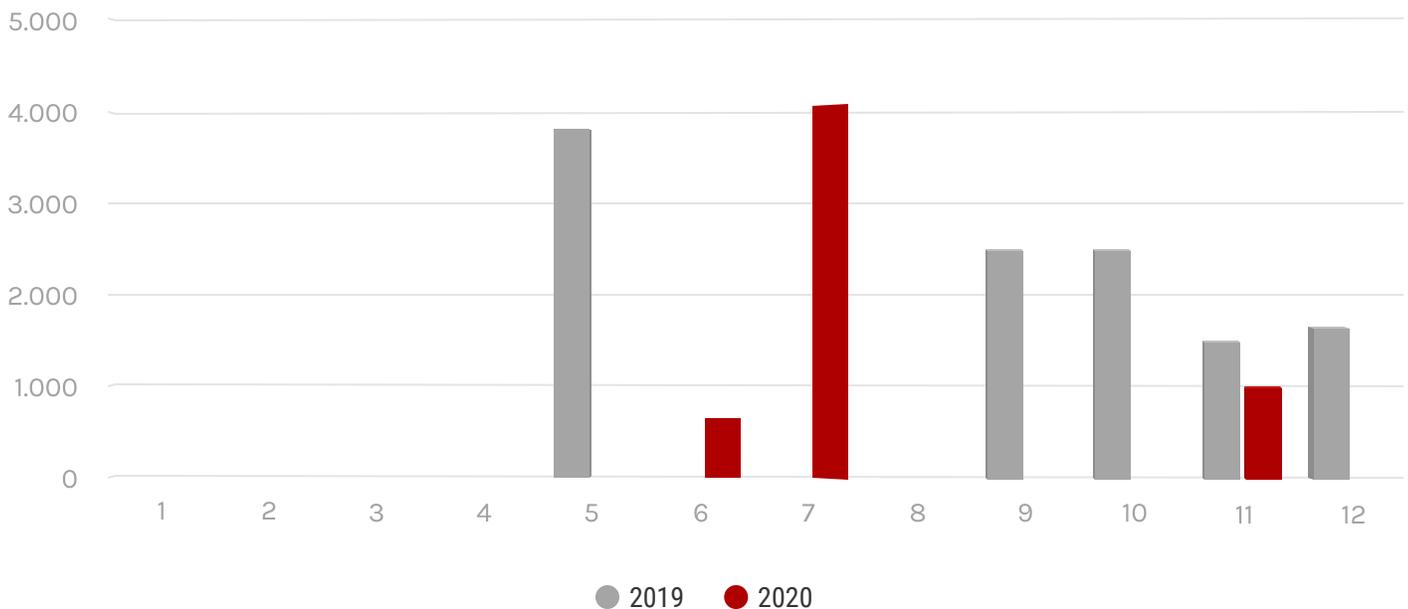
In June, the first month of the election campaign, AA spent just that amount on fuel even though it had no transportation expenses in the same month of the previous year.

Transportation expenses from funds for financing the regular operation, by months (2019 and 2020)



Promotional material. AA had lower expenses of promotional material in the election year, but they were paid mostly in July, during the election campaign, although in the same period of the previous year they did not have this type of expenses at all. The highest expense, which incurred in July 2020, is the payment of around four thousand euros to the company Defacto Consultancy, which is mainly engaged in public opinion research. In addition, AA hired the company Refresh Media during the election campaign, which does design, as well as advertising through social media. The company was paid around 600 euros in June and an additional 1,000 euros in November.

Expenses of promotional material from funds for financing the regular operation, by months (2019 and 2020)

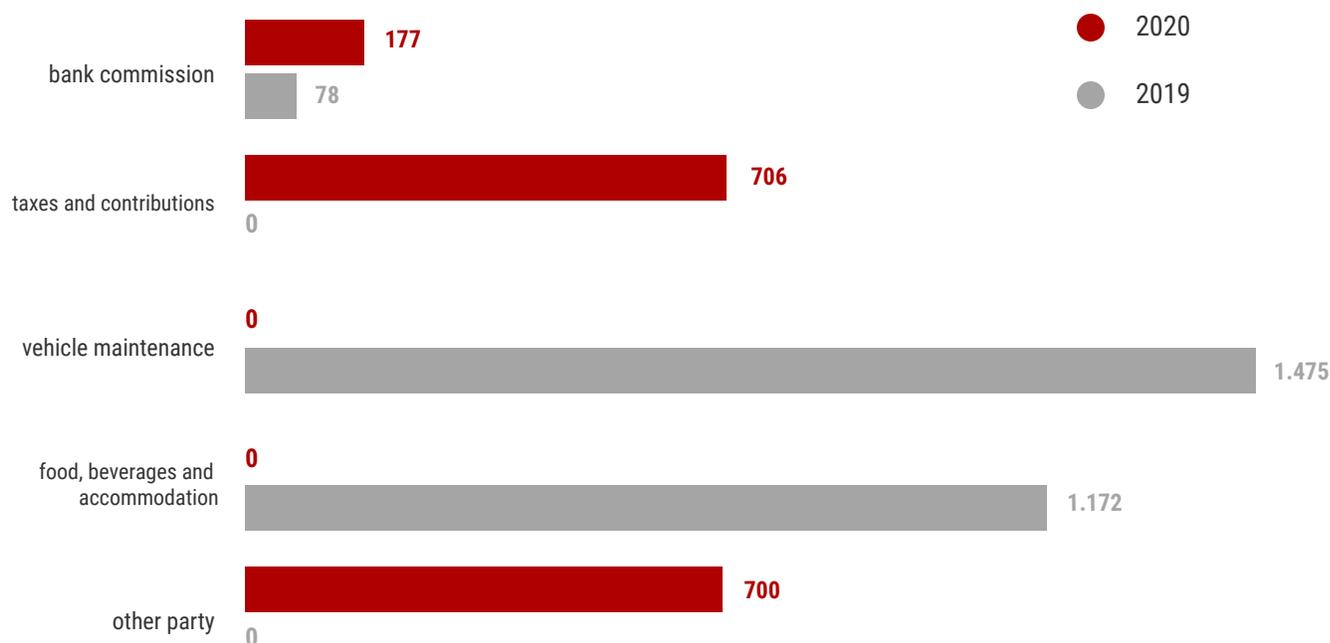


Advertising. In 2019 and in 2020, AA had no advertising expenses to be paid from the funds for financing the regular operation of the party.

Other expenses. The increase in these expenses is due to increased payments of taxes and contributions, which corresponds to higher costs of salaries and payments based on temporary employment contracts. In August 2020, AA paid 700 euros to the Democratic Alliance of Albanians.

14.3.

Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



Cash money. AA did not provide us with data on any treasury, and there were no cash payments from available accounts. That party had at least two thousand euros in cash in 2019 alone, which is stated in its financial statements.

14.4.

PAYMENT OF ELECTION CAMPAIGN EXPENSES

From the available accounts, AA **did not** pay the expenses of 3,324 euros to Triopro for the production of advertising material used for the parliamentary elections campaign. It is an advertising agency from Ulcinj.

Namely, that party provided us with all statements from its accounts for financing the regular operation by the end of 2021, and no debts to the said supplier were paid from them.

D.15.

New Democratic Force (FORCA)

In two years, FORCA had a total revenue of around 180 thousand euros and almost the entire amount consists of funds from public sources.

That party is very transparent and has an average score of 4.99.

FORCA did not have increased expenses of financing the regular operation during the election campaign compared to the same period of the previous year.

However, in the month when the elections were held, there was an increase in some expenses compared to the same period of the previous year, as follows:



increased payment of per diems,



three times the value of purchased computer equipment.

This party did not manage the financing of any election campaign in 2019 and 2020.

TRANSPARENCY OF FINANCIAL OPERATIONS

What is available?

Pursuant to the Law on Free Access to Information, we received data from FORCA on inflows and outflows from six accounts during 2019 and 2020, namely: two head office accounts, two Women's Forum accounts, one foreign currency account, one business card account, as well as data on spending from one treasury.

Transparency scores of financial operations

Total transparency score [102] of financing of FORCA is 4.99. It is also a transparency score of the party's regular operation financing, because it did not independently participate in the elections and manage the financing of the election campaigns, thus, there is no transparency score of the election campaigns financing.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
	5.00	3.00	5.00	5.00
Head office	all statements submitted, SAI has no data complete data available for 100% of transactions	all statements submitted complete data available for 1% of transactions	all statements submitted complete data available for 100% of transactions	SAI has no data complete data available for 100% of transactions, cash withdrawal from the account coincides with 100% of the treasury inflows
	5.00	-	-	-
Women's Forum	all statements submitted, SAI has no data complete data available for 100% of transactions	no -	no -	no -
	-	-	-	-
Municipal boards	no -	no -	no -	no -
Transparency score of the regular operation financing				4.99

[102] More detailed information on the methodology used to assess the transparency of political parties is provided in the chapter B. Methodology.

15.1.

Description	Bank accounts	Foreign currency accounts	Cards	Treasuries
2020 Elections	<i>Other party was in charge of the finances</i>			
Kotor	<i>did not participate</i>	-	-	-
Budva	<i>did not participate</i>	-	-	-
Tivat	<i>did not participate</i>	-	-	-
Tuzi	<i>did not participate</i>	-	-	-
Andrijevica	<i>did not participate</i>	-	-	-
Gusinje	<i>did not participate</i>	-	-	-
Transparency score of the election campaigns financing				-

Total transparency score of the party financing

4.99

What is missing?

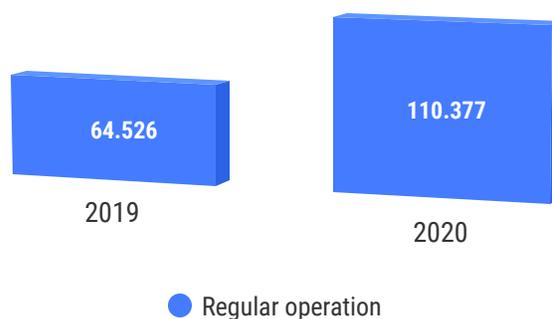
All information has been provided, however, statements from the foreign currency account do not contain information on suppliers.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues reported by FORCA in 2019 were **around 65 thousand euros**, and **around 110 thousand** in 2020, while there were no separate funds for financing the election campaign.

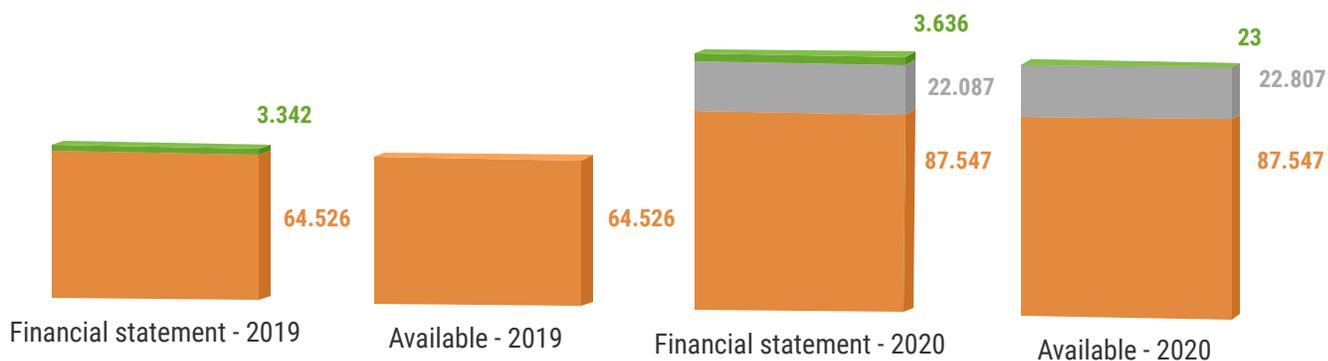
Available revenues for financing the regular operation (2019 and 2020)



Comparison with data from financial statements

According to the reports of the State Audit Institution and the consolidated financial statement, FORCA provided us with all revenue data. Namely, other revenues listed in official reports relate to debt write-offs.

Comparison of data from financial statements on total revenues with available information from all available accounts in 2019 and 2020



State



Municipalities



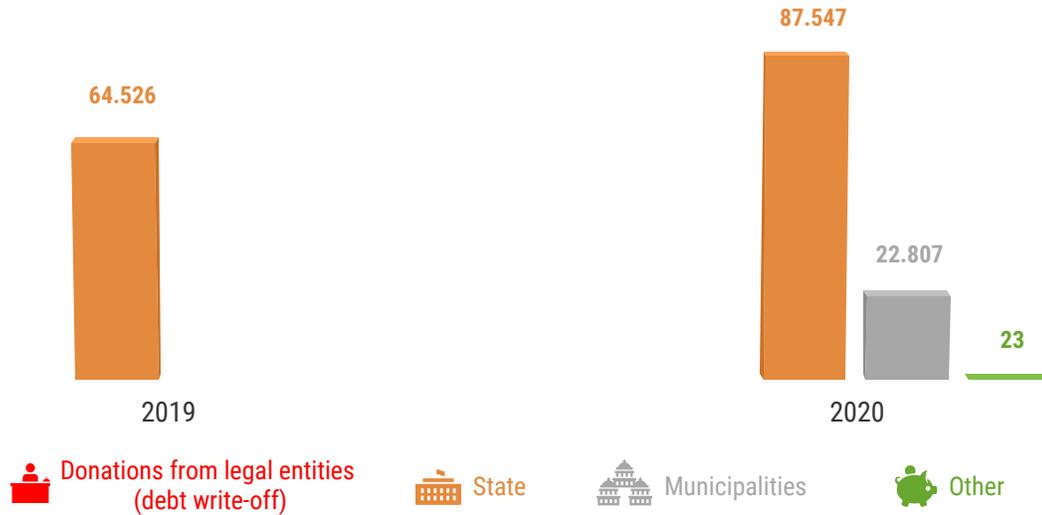
Other

15.2.

Revenue sources

Most of FORCA's official revenues come from the state. The party started receiving municipal funds only in 2020, and even the smallest amounts of debts of that party have been written off.

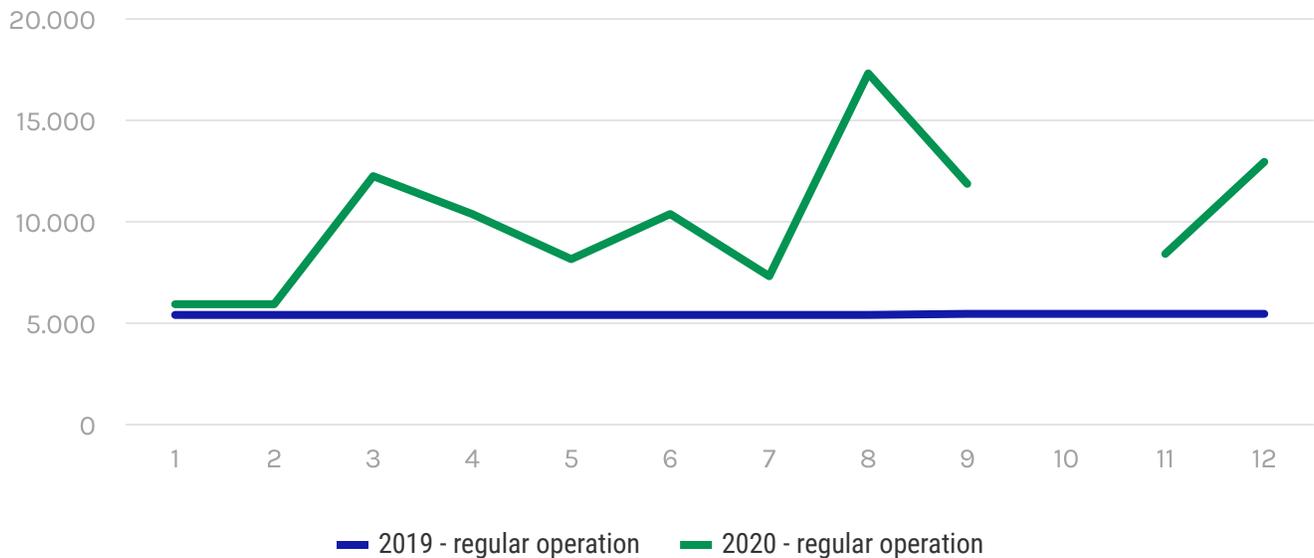
Revenue sources in 2019 and 2020



Average monthly revenues and payment dynamics

FORCA's monthly revenues doubled in 2020, from five to 10,000 euros. While the party was paid the same amounts per month in 2019, they varied in 2020.

All available revenues by months (2019 and 2020)

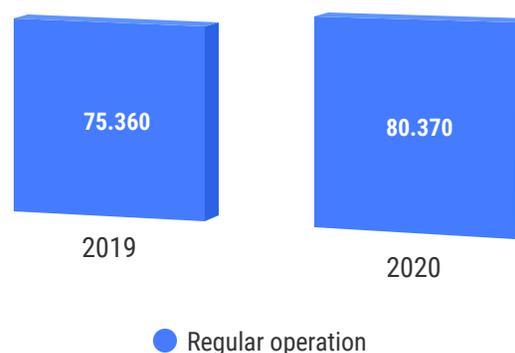


ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

In 2019, the expenses of regular operation of FORCA amounted to **around 75 thousand euros**, and **around 80 thousand euros** in 2020.

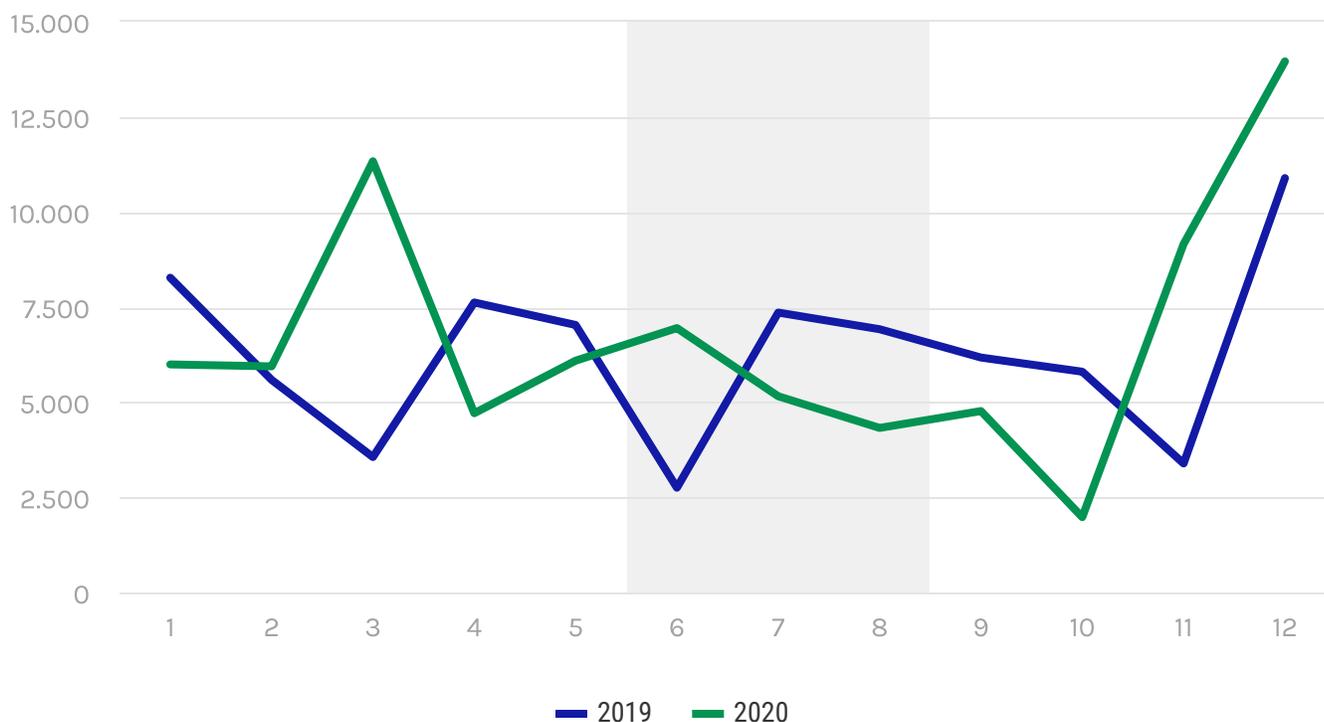
Available expenses of regular operation (2019 and 2020)



Monthly expenses

In the election year, monthly expenses are lower than in the previous one, except in March, June, November and December. The expenses in June 2020 were twice as high than in 2019.

Expenses of financing the regular operation, by months (2019 and 2020)

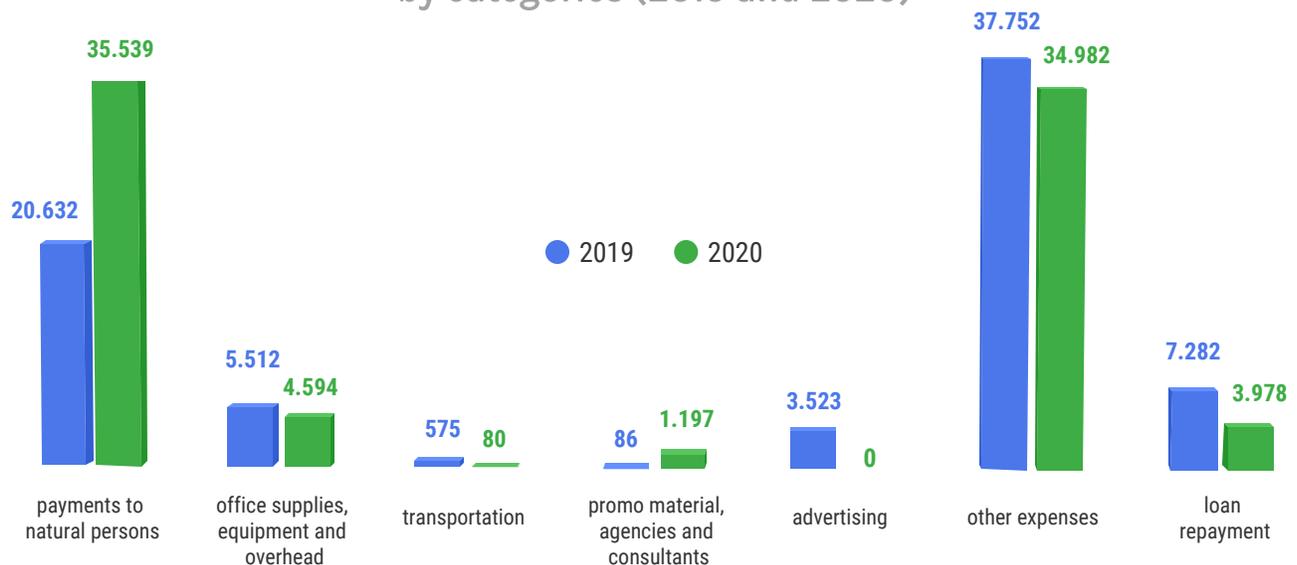


15.3.

Which expenses of regular operation increased in the election year and during the election campaign?

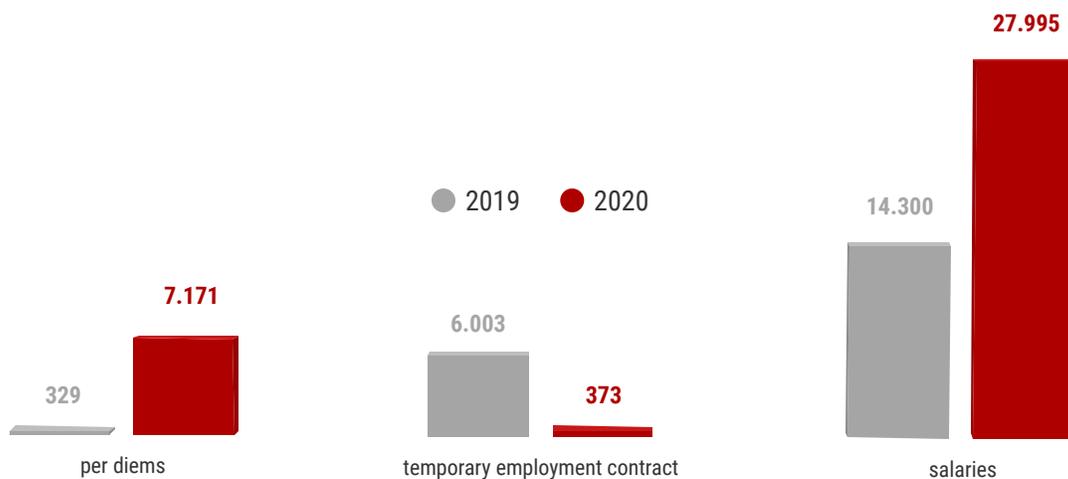
In the election year, payments to natural persons increased, and there was a slight increase in promotional material expenses, while all other categories of expenses are lower than in 2019.

Expenses of regular operation, by categories (2019 and 2020)



Payments to natural persons. In the election year, payments of per diems to natural persons and the salaries of employees of the party multiplied.

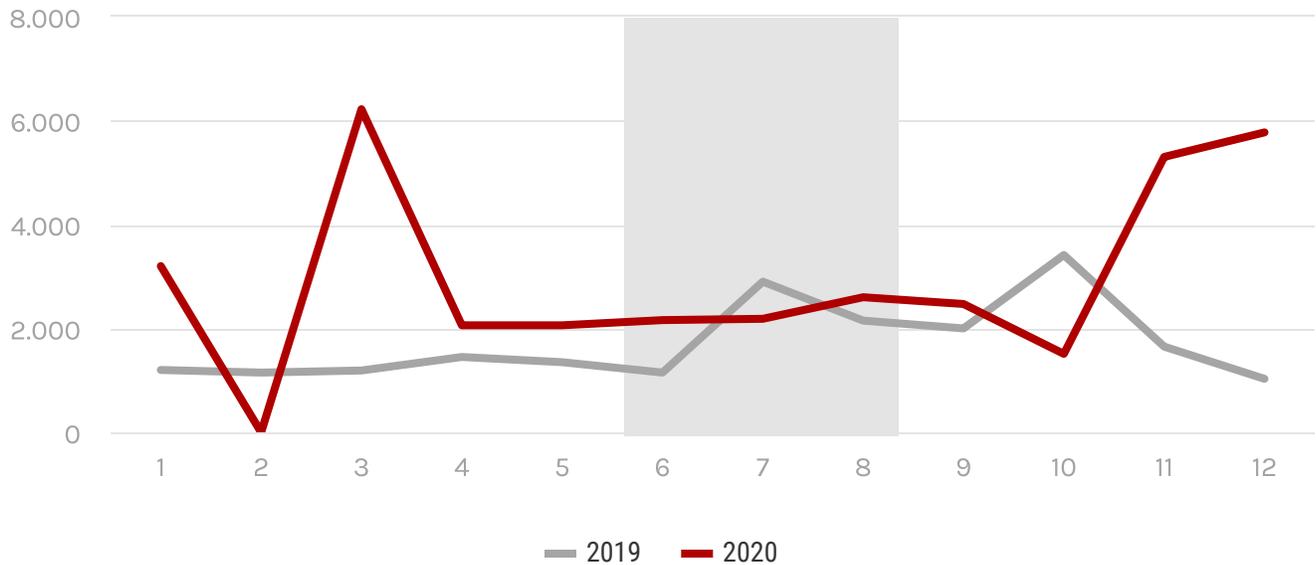
Payments to natural persons from the funds for financing the regular operation, by types (2019 and 2020)



15.3.

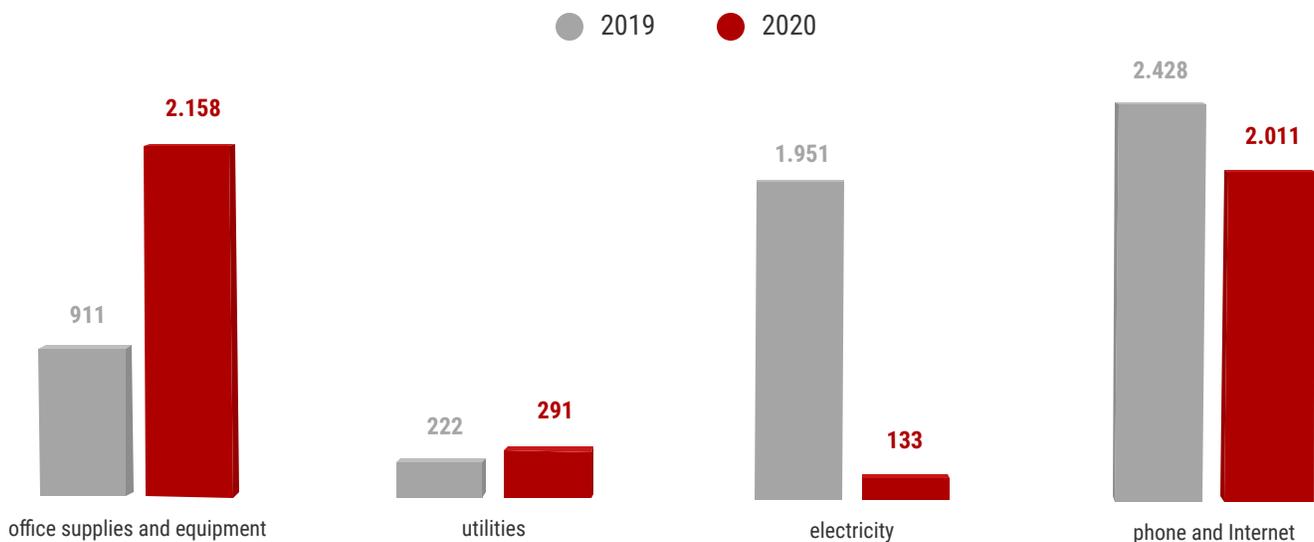
In August, the month when the elections were held, the expenses were slightly higher than in the previous year due to the payment of per diems.

Payments to natural persons from the funds for financing the regular operation, by months (2019 and 2020)



Office supplies, equipment and overhead. In the election year, the expenses of office supplies and equipment doubled.

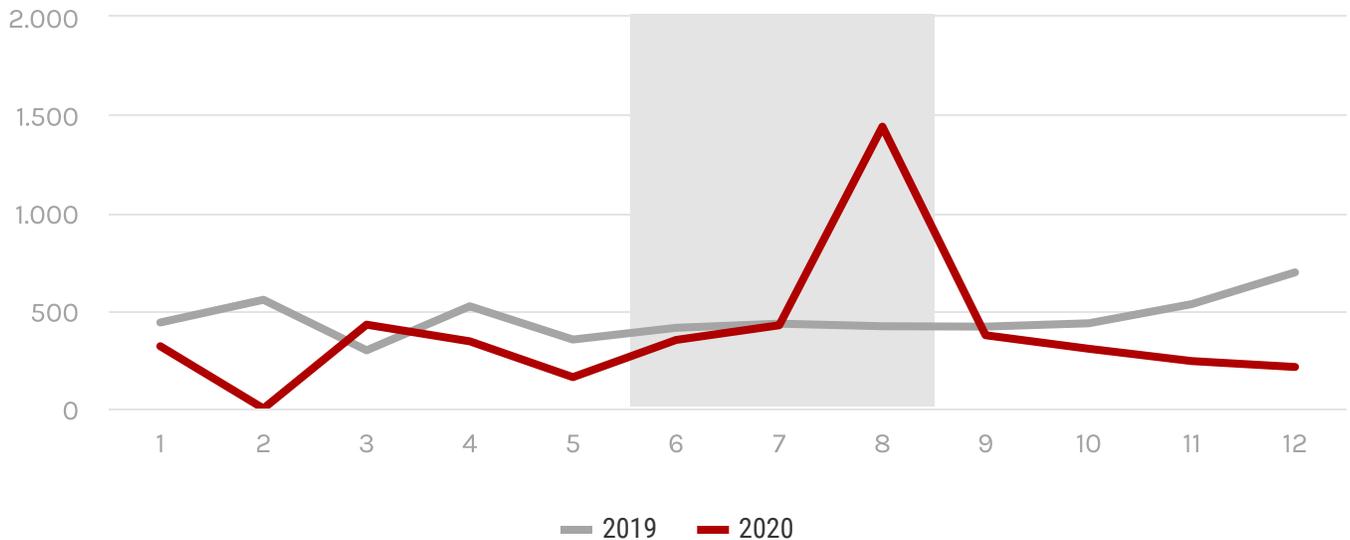
Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by types (2019 and 2020)



15.3.

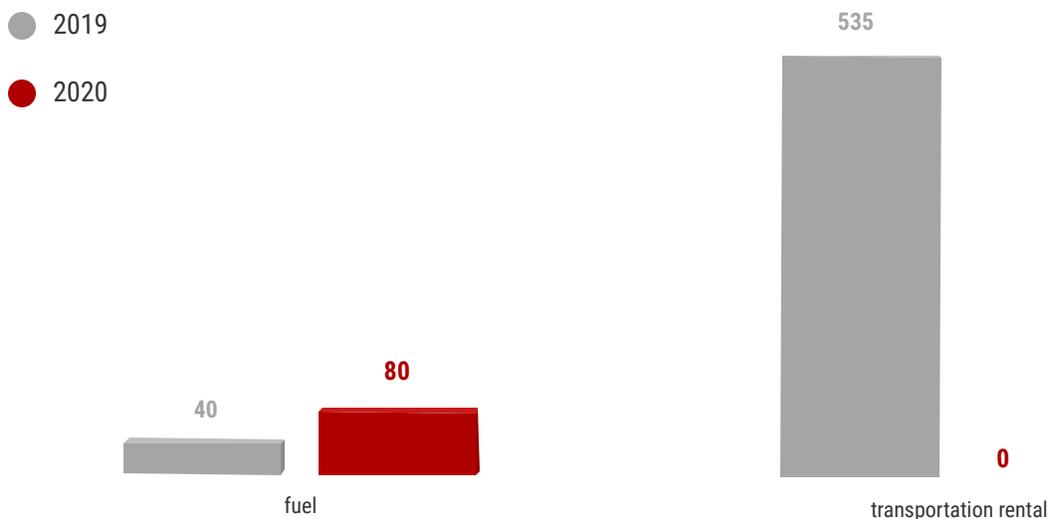
The expenses increased in August, the month when the elections were held, due to the purchase of equipment from My Computer company.

Expenses of office supplies, equipment and overhead from funds for financing the regular operation, by months (2019 and 2020)



Transportation. Transportation expenses are lower in the election year than in the previous year and are almost non-existent.

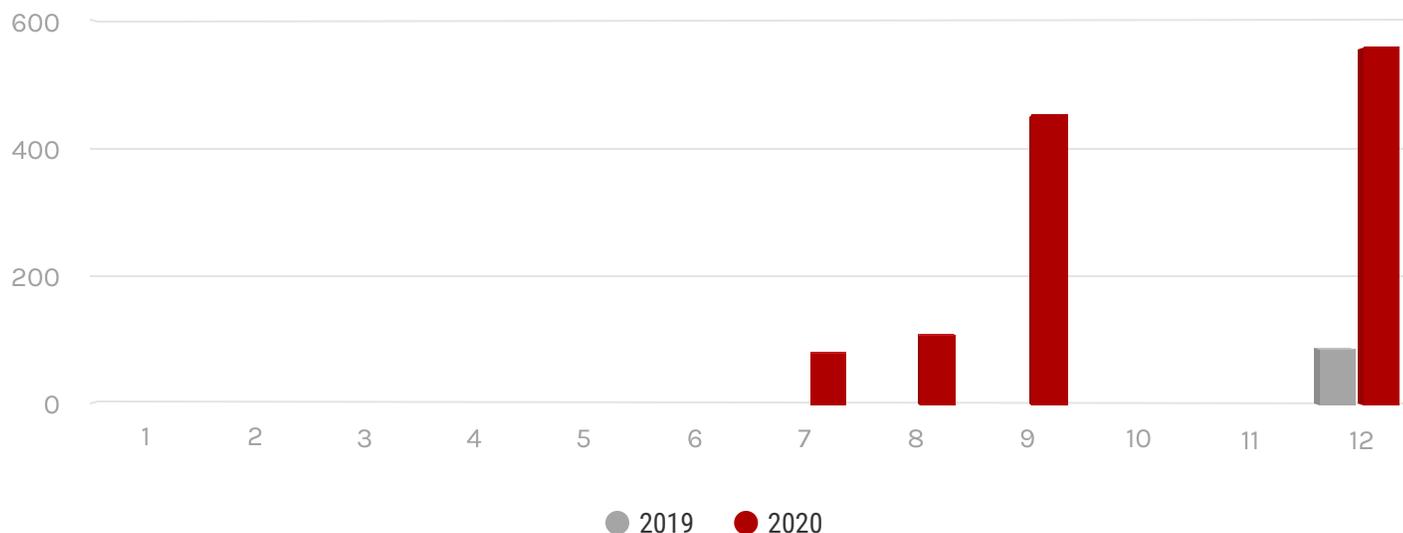
Transportation expenses from funds for financing the regular operation, by types (2019 and 2020)



15.3.

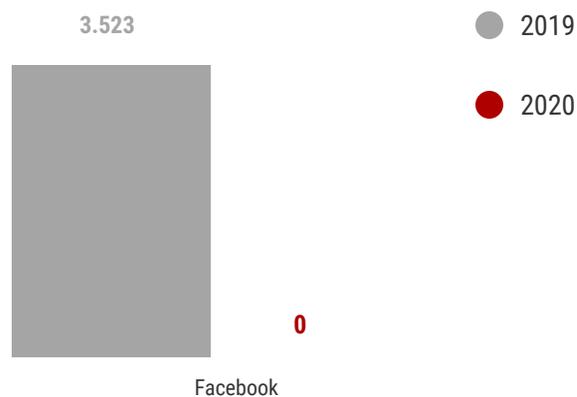
Promotional material. In 2019, this party had almost no expenses of promotional material, while in 2020, they were negligible.

Expenses of promotional material from funds for financing the regular operation, by months (2019 and 2020)



Advertising. In the election year, this party did not have advertising expenses. They only existed in 2019, and related to advertising on Facebook.

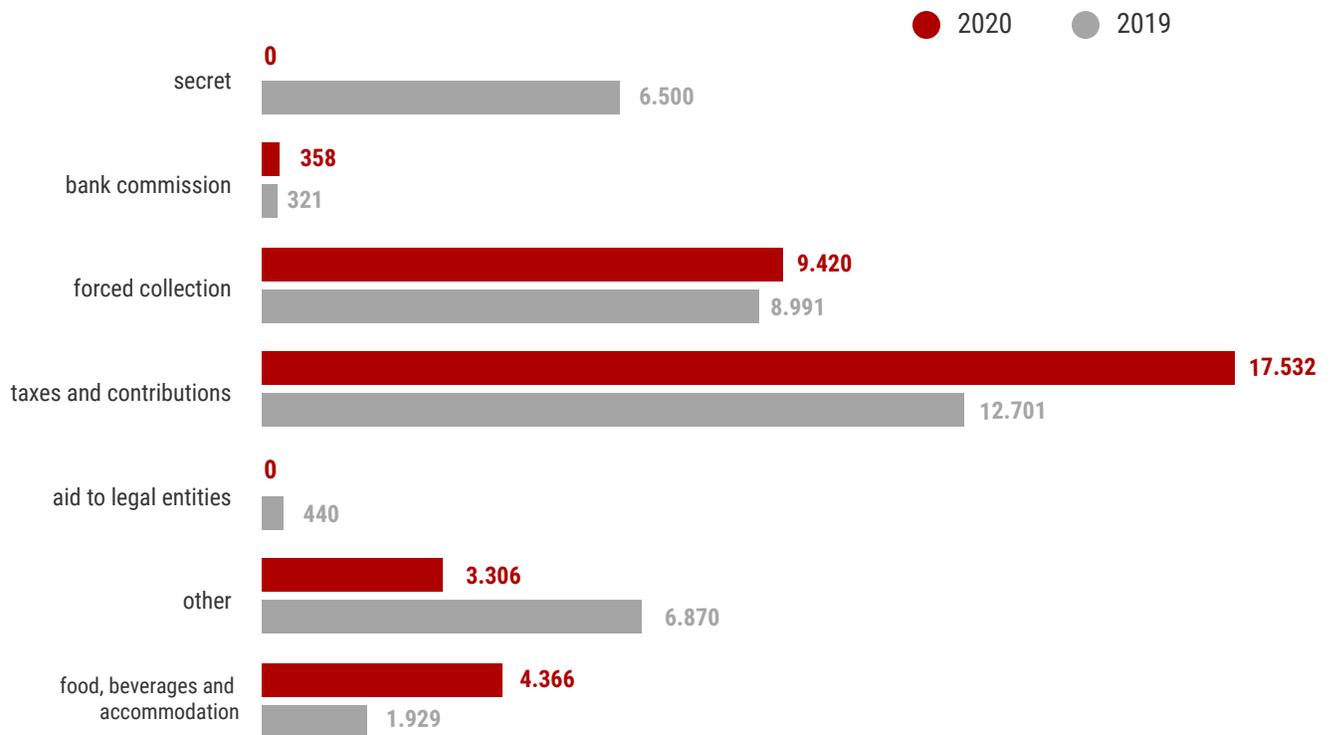
Advertising expenses from the funds for financing the regular operation, by types (2019 and 2020)



Other expenses. Expenses of food, beverages and accommodation increased in the election year, as well as taxes and contributions.

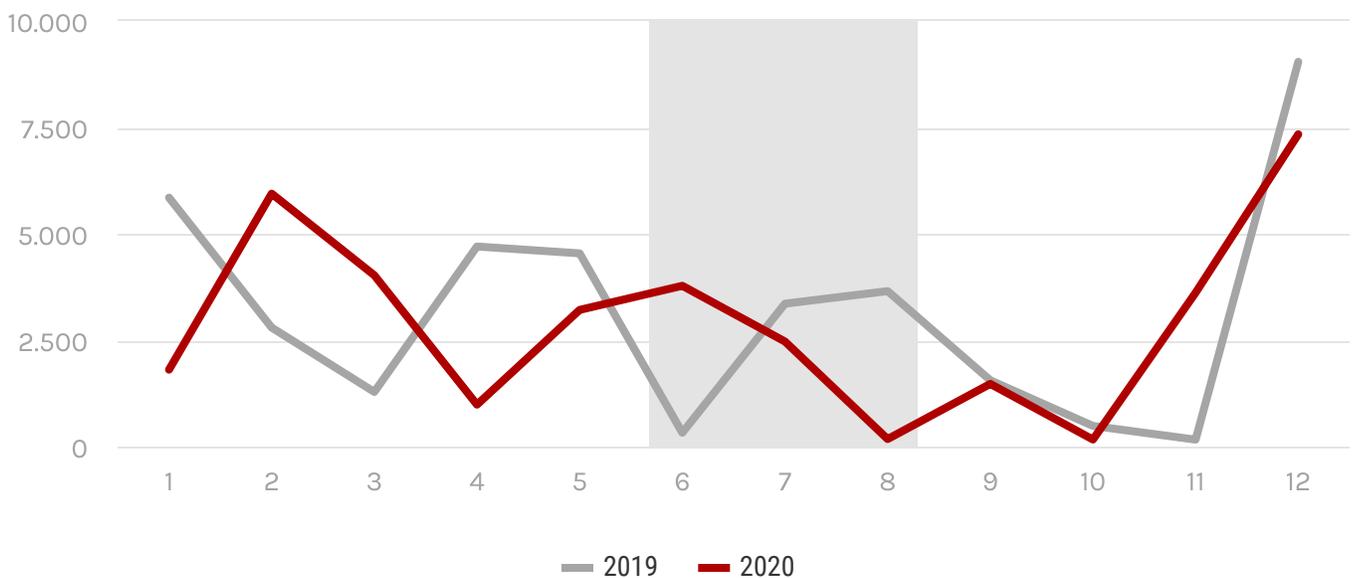
15.3.

Other expenses from the funds for financing the regular operation, by types (2019 and 2020)



However, during the election campaign, only expenses of taxes and contributions increased, while the increase of food and beverages expenses occurred only at the end of that year.

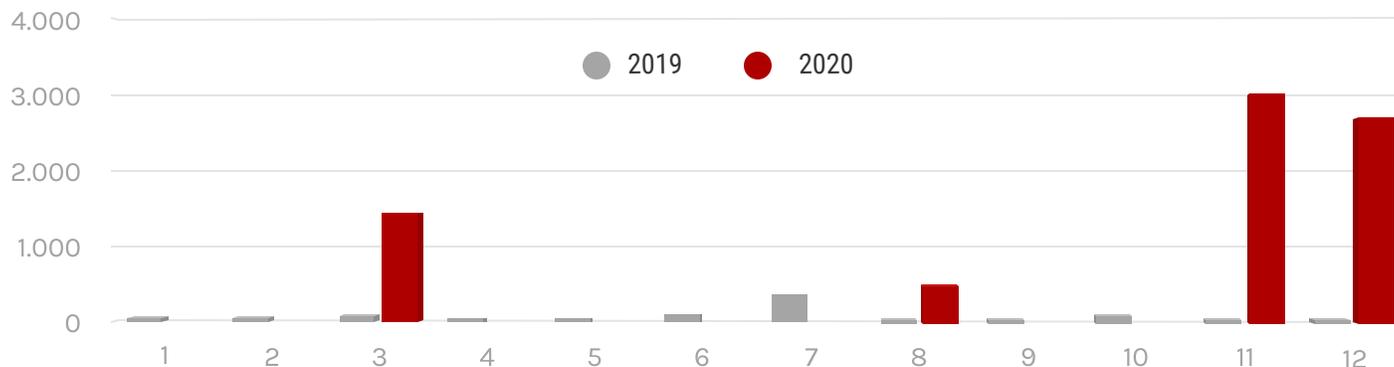
Other expenses from the funds for financing the regular operation, by months (2019 and 2020)



15.3.

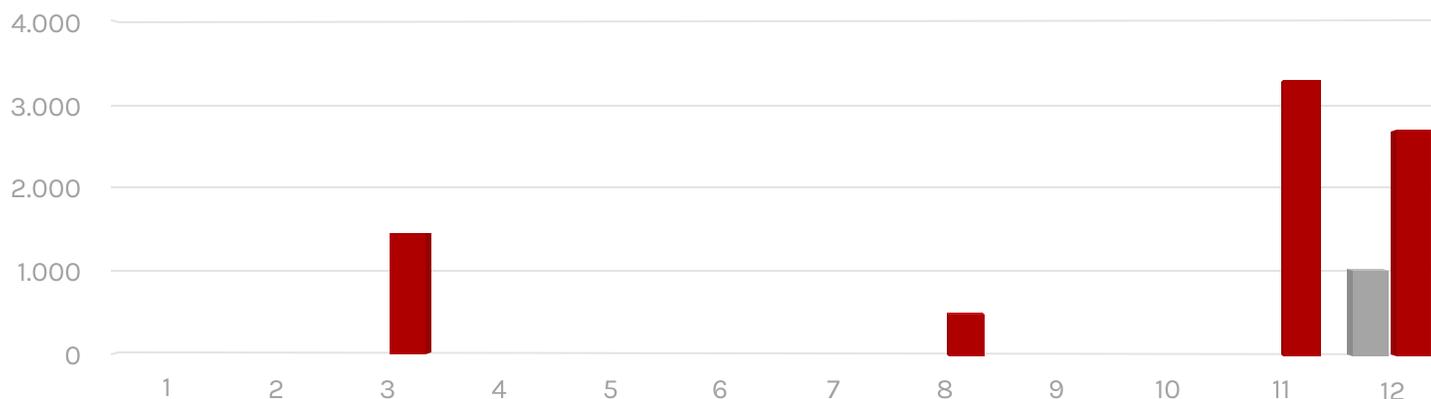
Cash money. Nearly seven times more cash was withdrawn in the election year than in the previous year, but mostly before or after the election campaign. A small amount of cash was withdrawn in August.

Dynamics of cash withdrawal from funds for financing the regular operation, by months (2019 and 2020)



While there was almost no spending of cash in 2019, it increased in 2020, but not during the election campaign.

Dynamics of cash consumption from funds for financing the regular operation, by months (2019 and 2020)



PAYMENT OF ELECTION CAMPAIGN EXPENSES

FORCA did not manage the finances for any of the election campaigns during 2019 and 2020.

D.16.

Workers' Party (RADNIČKA)

The Workers' Party earned 115,000 euros in two years, exclusively from public funds.

However, this party is among non-transparent parties with a score of 0.

Radnička did not publish a single data on its finances based on the requests for information that MANS had submitted to them. In the last two years, no audit reports on its finances were made.

In official reports, the Workers' Party reported the expenses of the parliamentary elections campaign, but they are greater than the liabilities that the party undertook by signing the Protocol with other members of the coalition.

In the election year, this party nearly doubled the payments of per diems and other benefits to natural persons.

16.1.

TRANSPARENCY OF FINANCIAL OPERATIONS

MANS submitted 37 requests for information to the Workers' Party and asked for data on their finances in 2019 and 2020, but that party did not respond to any of our requests.

We have filed appeals in all 37 cases, and decisions were made in 27 cases, and each of them is instructing the Workers' Party to act upon our request. That party, however, has still not responded to our requests.

Only the mandatory consolidated financial statements for 2019 and 2020 are available to the public, while the audit reports have not been prepared.

Total transparency score of the party financing

0.00

16.2.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

According to the data from the financial reports, in 2019, the Workers' Party had **about 55 thousand euros** of revenues, and **around 59 thousand** in 2020.

Official sources of the financing in 2019 and 2020



Revenue sources

The only official source of financing for the Workers' Party was the state budget.

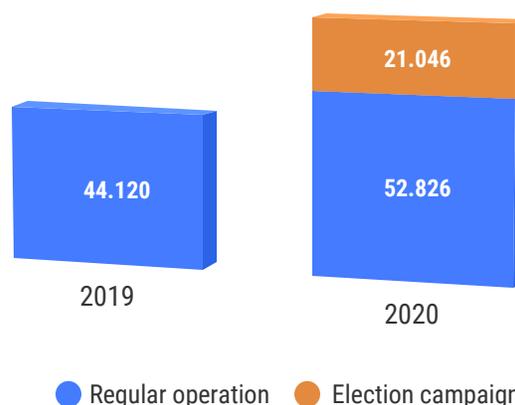
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

Total expenses [103] of regular operation of the Workers' Party were **44,000 euros** in 2019, and **nearly 53,000** in 2020.

In addition, the party stated in its financial statements that it had around 21,000 euros in campaign expenses for the parliamentary elections.

Official expenses of the regular operation and election campaigns (2019 and 2020)



Which expenses of regular operation increased in the election year?

Financial statements show that the party allocated more funds for per diems in the election year than in the previous one. Namely, around 38 thousand euros was spent on per diems and other benefits in 2020, and around 20 thousand in 2019.

In its financial statement for 2020, the party states that it spent around 21 thousand euros to finance the parliamentary elections campaign, although according to official data, it spent only five thousand euros.

Obrazac TNOFIK

Troškovi nastali po osnovu finansiranja izborne kampanje		
Izborna kampanja	Period održavanja	Ukupno (u €)
Parlamentarni izbori	30.08.2020.	21.046,48
Ukupno:		21.046,48

Photo 27: Excerpt from the financial statement of the Workers' Party for 2020, page 9

[103] These data do not include depreciation costs reported in the financial statements.

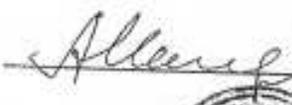
16.3.

Namely, the Workers' Party was part of the coalition "For the Future of Montenegro", whose finances during the election campaign were managed by NOVA. The official report on the financing of that campaign lists the sources of financing, including their own funds. However, it does not state which member of the coalition paid its own funds, but we determined that by analysing the statement from the NOVA's account, which states that the Workers' Party paid only five thousand euros.

According to the protocol signed by the members of that coalition after the elections, the Workers' Party was obliged to pay 15,571 Euros for the election campaign expenses. If we add that amount to the payment of the Workers' Party to the account for financing the election campaign, the value is lower than stated in the official report.

PII		
	DJOKOVIC DOO	10.575,20
	DAILY PRESS DOO	1.592,19
	JUMEDIA MONT DOO- DAN	1.000,00
	A MEDIA TIM	1.347,45
	DJOKOVIC DOO	1.056,28
	УКУПНО	15.571,12

Овај протокол ступа на снагу 21.10.2020. године и има снагу извршне исправе

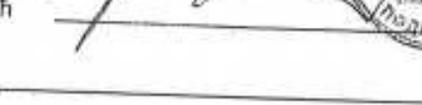
Нова српска демократија Андрија Мандић 

Покрет за промјене, Небојша Медојевић 

Демократска народна партија, Милан Кнежевић 

Социјалистичка народна партија, Владимир Јоковић 

Права Црна Гора Марко Милачић 

Уједињена Црна Гора Горан Даниловић 

Радничка партија Максим Вучинић 



Photo 28: Excerpt from the Protocol on the settlement of the coalition "For the Future of Montenegro"

D.17.

United Montenegro (UJEDINJENA)

United Montenegro had around 70,000 euros in revenue in two years, of which 65,000 came from public sources.

This party is non-transparent with a score of 0.

United Montenegro did not disclose a single data on its finances based on the requests for information MANS had submitted to them. In the last two years, no audit reports on their finances were made.

In the election year, United Montenegro spent three times more on the purchase of office and other supplies than in the previous year.

Financial statements of United Montenegro state that they did not have election campaign expenses in 2020, although according to the protocol signed by the members of their coalition, they took over more than 15 thousand euros of debts incurred on that basis.

17.1.

TRANSPARENCY OF FINANCIAL OPERATIONS

MANS submitted 53 requests for information to United Montenegro and asked for data on their finances in 2019 and 2020, but that party did not respond to any of our requests.

We have filed appeals in all 53 cases, and decisions were made in 44 cases and each of them is instructing United Montenegro to act upon our request. That party, however, has still not responded to our requests.

Only the mandatory consolidated financial statements for 2019 and 2020 are available to the public, while the audit reports have not been prepared.

Total transparency score of the party financing

0.00

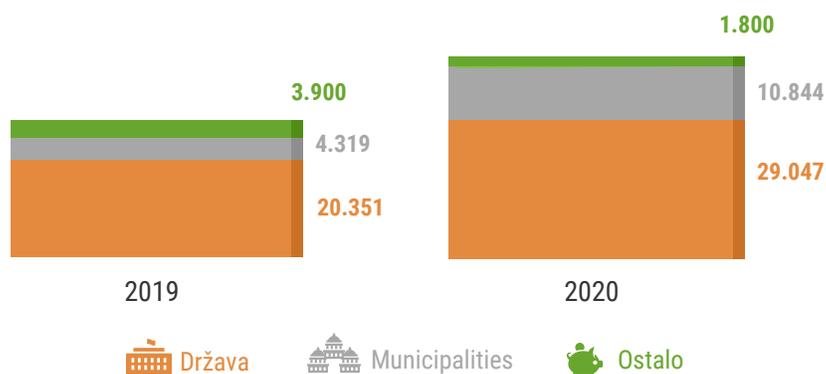
17.2.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total revenues of United Montenegro were **around 28 thousand euros** in 2019, and they increased to **over 41 thousand** in 2020.

Official sources of financing in 2019 and 2020



Revenue sources

The largest source of revenue is the state budget, followed by municipal budgets, while other sources of funding are very small.

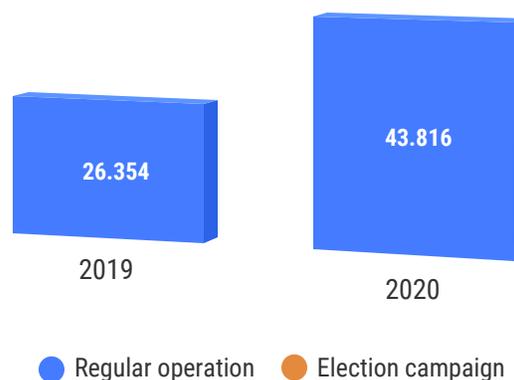
ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

Total expenses [104] of the United Montenegro were **26 thousand euros** in 2019, and **nearly 44 thousand** in 2020.

The party stated in its financial reports that it had no election campaign expenses.

Official expenses of the regular operation and election campaigns (2019 and 2020)



Which expenses of regular operation increased in the election year?

Very brief financial statements show that in the election year, United Montenegro spent three times more funds for the purchase of office and other supplies than in the previous one.

Obrazac „TNOKM“

Troškovi nastali po osnovu kupovine kancelarijskog i drugog materijala za redovan rad				
Predmet (opis)	Naziv i sjedište dobavljača	Datum nastanka troška (datum prijema predmeta)	Datum plaćanja	Iznos (u €)
<i>TI grafičar, TI knjigovodstvo i ovio karti, TI reklame</i>				<i>430 + 284 + 660 + 1674,95 +</i>
<i>TI plotnaš, pribor, TI drugi, TI prevoz po odlogu</i>				<i>102,95 + 300 + 500 + 500 + 285</i>
<i>TI drugi (kancelarijski)</i>				
Ukupno:				<i>4471,94</i>

Photo 29: Excerpt from the financial statement of United Montenegro for 2019, page 11

[104] These data do not include depreciation costs reported in the financial statements.

Tr. staja, tr. PIT, tr. odobrenje ulaza, tr. CIA i odpora, tr. plućnog jezera, tr. opremljena, tr. putnički god. =
 = 535,42 + 657,43 + 288 + 288,84 + 122,66 + 1400 + 6023,52 =

Obrazac „TNOKM“

14 45,90 - ukupno

Troškovi nastali po osnovu kupovine kancelarijskog i drugog materijala za redovan rad				
Predmet (opis)	Naziv i sjedište dobavljača	Datum nastanka troška (datum prijema predmeta)	Datum plaćanja	Iznos (u €)
Tr. kancel. materijal	MBS kancel.	11.06.2020	17.11.2020	42,35
Tr. kancel. materijal	Faximile	09.10.2020	30.11.2020	160,01
Tr. troškovi za putovanja	VSG	03.12.2020	15.12.2020	21,18
Tr. troškovi za putovanja	Kubija d.o.o.	09.12.2020	25.12.2020	157,45
- II -	- II -	10.12.2020	25.12.2020	9,35
- II -	- II -	12.11.2020	17.11.2020	154,64
Tr. kancel. inventar	Technoavx	07.12.2020		265,57
Tr. kancel. inventar	Novos	24.12.2020	31.12.2020	440,00
Tr. kancel. inventar	Cilindar	23.12.2020	31.12.2020	234,36
Tr. kancel. inventar	2 - mobilni	20.05.2020	29.05.2020	440,00
Tr. kancel. inventar	2 - mobilni	15.05.2020	29.05.2020	305,00
Tr. reklama	Facebook	01.01.2020 - 31.12.2020	31.12.2020	1612,31
- II -	Toš M.M. d.o.o.	30.01.2020	04.02.2020	112
- Ukupno:	Daily press	20.01.2020	28.12.2020	423,50

Photo 30: Excerpt from the financial statement of United Montenegro for 2020, page 11

United Montenegro spent most of its revenues on payments to natural persons under temporary employment contracts.

It is not known whether United Montenegro paid 15,000 euros in election campaign expenses borne by the party under a Protocol signed by members of the coalition “For the Future of Montenegro”. [105]

17.3.

УЦГ		
	A MEDIA TIM	9.237,66
	JUMEDIA MONT DOO- DAN	2.914,88
	DJOKOVIC DOO	3.418,58
	УКУПНО	15.571,12
РН		
	DJOKOVIC DOO	10.575,20
	DAILY PRESS DOO	1.592,19
	JUMEDIA MONT DOO- DAN	1.000,00
	A MEDIA TIM	1.347,45
	DJOKOVIC DOO	1.056,28
	УКУПНО	15.571,12

Овај протокол ступа на снагу 21.10.2020. године и има снагу извршне исправе

Нова српска демократија Андрија Мандић

Покрет за промјене, Небојша Медојевић

Демократска народна партија, Милан Кнежевић

Социјалистичка народна партија, Владимир Јоковић

Права Црна Гора Марко Милачић

Уједињена Црна Гора Горан Даниловић

Радничка партија Максим Вучинић

Photo 31: Excerpt from the Protocol on the settlement of the coalition "For the Future of Montenegro"

According to the financial statements, the party did not have election campaign expenses in 2020.

Образац USOFIK

B. Utrošena sredstva po osnovu finansiranja izborne kampanje	
UKUPNO (u €):	

Photo 32: Excerpt from the financial statement of United Montenegro for 2020, page 15

D.18.

True Montenegro (PRAVA)

Total official revenues of True Montenegro for two years amounted to 51 thousand euros, of which 43 thousand were paid from public sources.

This party is non-transparent with a score of 0.

Prava did not disclose a single data on its finances based on the requests for information MANS had submitted to them. In the last two years, no audit reports on their finances were made.

In the election year, True Montenegro had two and a half times higher expenses than in the previous year. In that year, there was a huge increase in the promotional material expenses, within which the highest expenses are of advertising and propaganda.

Financial statements of True Montenegro state that they did not have election campaign expenses in 2020, although according to the protocol signed by the members of their coalition, they took over more than 15 thousand euros of debts incurred on that basis. The same amount is shown as the advertising and propaganda expense in the financial statement of True Montenegro relating to the election year.

Although the president of True Montenegro publicly stated that the Democratic Front owed 200,000 euros to that party, those debts are not mentioned in financial statements.

18.1.

TRANSPARENCY OF FINANCIAL OPERATIONS

MANS submitted 39 requests for information to True Montenegro and asked for data on their finances in 2019 and 2020, but that party did not respond to any of our requests.

We have filed appeals in all 39 cases, and decisions were made in 29 cases, and each of them is instructing True Montenegro to act upon our request. That party, however, still has not responded to our requests.

Only the mandatory consolidated financial statements for 2019 and 2020 are available to the public, while the audit reports have not been prepared.

Total transparency score of the party financing 0.00

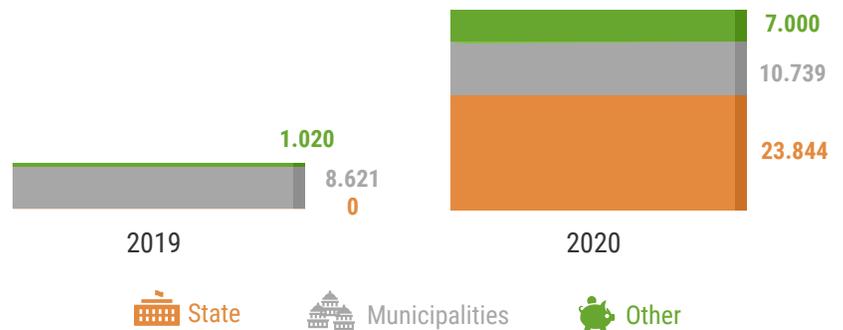
18.2.

ANALYSIS OF THE AVAILABLE REVENUE DATA

Total revenues

Total official revenues of True Montenegro were **less than 10 thousand euros** in 2019, and in 2020, they increased to **over 41 thousand**.

Official sources of financing in 2019 and 2020



Revenue sources

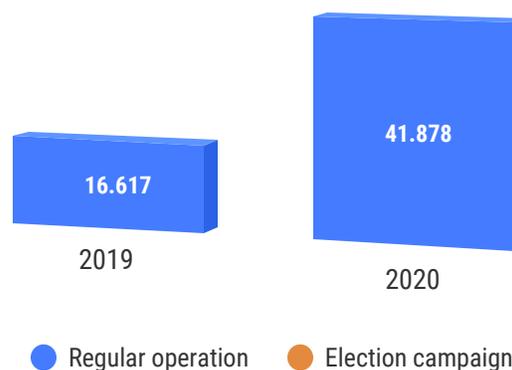
While in 2019 the largest source of revenue was the municipal budget, in 2020, twice as much money was received from the state budget than from municipalities. In the election year, True Montenegro had a donation of seven thousand euros from three natural persons, and in the previous year, two persons donated one thousand euros.

ANALYSIS OF AVAILABLE DATA ON EXPENSES

Total expenses

In 2019, True Montenegro reported total expenses [106] of less than 17 thousand euros, and nearly 42 thousand in the election year.

Official expenses of the regular operation and election campaigns (2019 and 2020)



Which expenses of regular operation increased in the election year?

In the election year, there was a huge increase in the expenses of office and other supplies, which were nearly 30 thousand euros in the election year, and only 32 euros in the previous year.

Obilježje: Troškovi

Troškovi nastali po osnovu kupovine kancelarijskog i drugog materijala za redovan rad				
Predmet (opis)	Naziv i jedište dobavljača	Datum nastanka troška (datum prijema predmeta)	Datum plaćanja	Iznos (u €)
TONER	KVISKO	27.02.19	27.02.19	15
TONER	KVISKO	14.08.19	14.08.19	15
POLJA	KASJET	21.08.19	21.08.19	2
Ukupno:				32

Photo 33: Excerpt from the financial statement of True Montenegro for 2019, page 26

[106] These data do not include depreciation costs reported in the financial statements.

Troškovi nastali po osnovu kupovine kancelarijskog i drugog materijala za redovan rad				
Predmet (opis)	Naziv i sjedište dobavljača	Datum nastanka troška(datum prijema predmeta)	Datum plaćanja	Iznos(u €)
Potrosni materijal				664,60
Reklamni materijal				273,90
Kancelarijski materijal				977,14
Mat.za održavanje				14,12
Troškovi goriva				729,59
Trosk.PTT-TEL.				1.582,13
Troškovi reklame i propagande				5.411,67
Troškovi reklame i propagande				15.571,12
Troškovi opremanja				199,54
Intelektualne usluge				21,78
Tr.Reprezentacije				316,42
Tr.Provizija				206,45
Tr. Taksa				520,42
Tr.kamata				1.620,71
Tr. Kazne i penali				1.500,00
Tr. amortizacije				76,72
Ukupno:				29.686,31

Photo 34: Excerpt from the financial statement of True Montenegro for 2020, page 12

In the financial statement for 2020, True Montenegro stated that it did not have the election campaign expenses. However, by signing the Protocol with other members of the coalition "For the Future of Montenegro", that party took over more than 15 thousand euros of NOVA's liabilities incurred during the election campaign.

18.3.

6. Zbirni izvještaj o rashodima	
<i>Obrazac USI</i>	
A. Utrošena sredstva od imovine	
UKUPNO (u €):	39.140,84
<i>Obrazac USOFIK</i>	
B. Utrošena sredstva po osnovu finansiranja izborne kampanje	
UKUPNO (u €):	
<i>Obrazac Z</i>	
C. Troškovi nastali po osnovu isplate zarada i ostalih naknada	
UKUPNO (u €):	5.934,73
UKUPAN IZNOS RASHODA (A+B+C)	Iznos (u €)
	45.075,57

Napomena:
Svi podaci koji su unijeti pod ovom oznakom izuzeti su od obaveze objavljivanja na internet stranici Državne izborne komisije. Ovi podaci se koriste isključivo za potrebe obavljanja poslova iz nadležnosti Državne izborne komisije i Državne revizorske institucije.


Potpis odgovornog lica

Photo 35: Excerpt from the financial statement of True Montenegro for 2020, page 17

ПЦГ	DAILY PRESS DOO	10.000,00
-----	-----------------	-----------

ZEN MASTER PRODUCTION DOO	3.002,40
JUMEDIA MONT DOO- DAN	1.000,00
DJOKOVIC DOO	1.568,72
УКУПНО	15.571,12
УПГ	
A MEDIA TIM	9.237,66
JUMEDIA MONT DOO- DAN	2.914,88
DJOKOVIC DOO	3.418,58
УКУПНО	15.571,12
РП	
DJOKOVIC DOO	10.575,20
DAILY PRESS DOO	1.592,19
JUMEDIA MONT DOO- DAN	1.000,00
A MEDIA TIM	1.347,45
DJOKOVIC DOO	1.056,28
УКУПНО	15.571,12

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Социјалистичка народна партија, Владимир Јосевић

Права Црна Гора Марко Милачић

Уједињена Црна Гора Горан Даниловић

Радничка партија Максим Вучинић

Photo 36: Excerpt from the Protocol on the settlement of the coalition "For the Future of Montenegro"

At the same time, the financial statement for the election year states the expenses of advertising and propaganda of 15,571.12 euros, and this is the exact amount of debts for the election campaign that True Montenegro took over under the protocol.

Troškovi nastali po osnovu kupovine kancelarijskog i drugog materijala za redovan rad				
Predmet (opis)	Naziv i sjedište dobavljača	Datum nastanka troška (datum prijema predmeta)	Datum plaćanja	Iznos (u €)
Potrosni materijal				664,60
Reklamni materijal				273,90
Kancelarijski materijal				977,14
Mat.za održavanje				14,12
Troskovi goriva				729,59
Trosk.PTT-TEL.				1.582,13
Troskovi reklame i propagande				5.411,67
Troskovi reklame i propagande				15.571,12
Troskovi opremanja				199,54
Intelektualne usluge				21,78
Tr.Reprezentacije				316,42
Tr.Provizija				206,45
Tr. Taksa				520,42
Tr.kamata				1.620,71
Tr. Kazne i penali				1.500,00
Tr. amortizacije				76,72
Ukupno:				29.686,31

Photo 37: Excerpt from the financial statement of True Montenegro for 2020, page 12

The President of True Montenegro announced in the Parliament that the Democratic Front owed 200,000 euros to that party. [107] However, according to the financial statements, at the end of 2020, the official claims of that party were less than a thousand euros.

[107] <https://www.portalanalitika.me/clanak/bulatovic-razlozi-su-politicki-ali-i-licni-becic-jedini-vodio-dijalog-abazovic-vodi-neke-druge>.

18.3.

PIB 1,110,32,885Šifra djelatnosti 9492NAZIV POLITIČKE PARTIJE PP „PRAVA CENA GORA“SJEDISTE POLITIČKE PARTIJE Podgorica

ISKAZ O FINANSIJSKOJ POZICIJI /BILANS STANJA/

na dan 31.12.2020 godine

-u EUR-

POZICIJA	Redni broj	Napomena broj	Iznos	
			Tekuća godina	Prethodna godina
1	2	3	4	5
AKTIVA				
A. STALNA IMOVINA (002+003+010)	001		4181	
I NEMATERIJALNA ULAGANJA	002			
II NEKRETNINE ,POSTROJENJA I OPREMA (004+005+006+007+008+009)	003		4181	
1.Zemljište	004			
2.Građevinski objekti	005			
3.Oprema	006		4181	
4.Alat i inventar	007			
5. Osnovna sredstva u pripremi i avansi	008			
6. Ostala osnovna sredstva	009			
III DUGOROČNI FINANSIJSKI PLASMANI (011+012)	010			
1. Učešća u kapitalu	011			
2. Ostali dugoročni finansijski plasmani	012			
B. ODLOŽENA PORESKA SREDSTVA	013			
C. OBRтна SREDSTVA (015)	014		13778	737
I KRATKOROČNA POTRAŽIVANJA, PLASMANI I GOTOVINA (016+017+018)	015		13778	737
1. Potraživanja	016		832	682
2. Kratkoročni finansijski plasmani	017			
3. Gotovinski ekvivalenti i gotovina	018		12946	55
D. UKUPNA AKTIVA (001+013+014)	019		17959	737
PASIVA				
A. KAPITAL (102 do 106)	101		(57165)	(53672)
I OSTALI KAPITAL	102			
II REZERVE	103			
III REVALORIZACIONE REZERVE	104			
IV NERASPOREDJENA DOBIT	105			
V GUBITAK	106		(57165)	(53672)

Photo 38: Excerpt from the financial statement of True Montenegro for 2020, page 20



ANNEXES

Annex 1: Overview of audit reports of the parliamentary political parties for 2019 and 2020

Party / year	2019	2020
DPS	YES	YES
Demokrate	YES	YES
NOVA	YES	YES
SD	YES	NO
SDP	YES	NO
SNP	NO	YES
BS	YES	NO
URA	YES	YES
PZP	NO	YES
DNP	NO	NO
DEMOS	NO	NO
HGI	NO	NO
LP	NO	NO
AA	YES	NO
FORCA	NO	YES
Radnička	NO	NO
Ujedinjena	NO	NO
Prava	NO	NO

Annex 2: Overview of official sources of financing of the parliamentary political parties

Party / period and source of funds	2019				2020				Total		
	State	Municipalities	Other	Loan	State	Municipalities	Other	Loan	Public sources	Private sources	Total
DPS	1,794,413	859,042	561,757		2,552,811	951,927	812,615	550,000	6,158,193	1,924,371	8,082,564
Demokrate	499,409	305,104	14,290		854,578	375,180	57,439	240,000	2,034,271	311,729	2,346,000
NOVA	440,400	108,638	28,755		1,156,351	128,122	389,657	50,000	1,833,511	468,412	2,301,923
SD	204,244	245,711	31,664		389,676	293,776	40,716	300,000	1,133,406	372,380	1,505,786
SDP	302,718	74,393	5,294		430,210	100,134	35,347	150,000	907,456	190,641	1,098,097
SNP	185,275	141,237	19,077		224,827	162,363	21,137	120,000	713,703	160,214	873,917
BS	212,472	93,813	32,951		396,104	69,222	36,859		771,611	69,810	841,421
URA	124,088	82,106	1,547		330,310	105,508	1,938	80,000	642,012	83,484	725,496
PZP	275,298	68,588	20,652		228,330	110,564	7,295		682,780	27,947	710,727
DNP	220,200	83,742	9,780		248,254	68,822	9,221		621,018	19,001	640,019
DEMOS	224,683	10,141	-		205,970	7,347	-		448,141	-	448,141
HGI	158,951	13,333	48		180,348	15,496	44		368,128	92	368,220
LP	-	24,256	94,487		110,023	24,276	8,406		158,555	102,893	261,448
AA	30,626	22,904	2,000		112,724	27,072	0		193,326	2,000	195,326
FORCA	64,526	-	3,342		87,547	22,087	3,636		174,160	6,978	181,138
Radnička	55,588	-	-		59,422	-	-		115,010	-	115,010
Ujedinjena	20,351	4,319	3,900		29,047	10,844	1,800		64,561	5,700	70,261
Prava	-	8,621	1,020		23,844	10,739	7,000		43,204	8,020	51,224

Annex 3: Overview of changes in expenses of the regular operation of parties during the election campaign

PARTY	Total expenses during the campaign	Payments to natural persons	Office supplies, equipment and overhead	Transportation	Promotional material, agencies and consultants	Advertising	Other expenses
DPS	?	?	?	?	?	?	?
Demokrate	↓	↑	↑	↑	↓↓	↓	↓
NOVA	↓	↓	≈	↓↓	↓	≈	↑↑
SD	?	?	?	?	?	?	?
SDP	↓	↑	≈	↓	↓	↑↑	↓↓
SNP	↑↑	↑	↑↑	≈	↑↑	↑	↑↑
BS	↑	↑	≈	↓↓	↑↑	≈	↑
URA	↑	↑↑	↑↑	≈	↑	↑↑	↑↑
PZP	?	?	?	?	?	?	?
DNP	↑↑	↓	↑↑	?	↓	↑	↑↑
DEMOS	↑↑	↑	≈	≈	≈	≈	↑↑
HGI	↑	≈	≈	≈	≈	≈	↑↑
LP	↑	↑	≈	≈	↑↑	↑	↑
AA	↑↑	↑↑	↑↑	↑	↑↑	≈	≈
FORCA	≈	≈	≈	≈	≈	≈	≈
Radnička	?	?	?	?	?	?	?
Ujedinjena	?	?	?	?	?	?	?
Prava	?	?	?	?	?	?	?

Annex 3: Key

↑↑ major increase

↑ increase

↓↓ major decrease

↓ decrease

≈ approximately the same

? unknown

