

Our Vision

Montenegro as a just, open society
of active citizens and governance serving its people.

Our Mission

MANS is non-governmental organization that is devoted to fighting the problems of corruption and organized crime that affect Montenegro.

Publisher:

The Network for Affirmation of NGO Sector-MANS
Dalmatinska 188, Podgorica, Montenegro

Tel/Fax: +382 20 266 326; +382 20 266 327

e-mail: mans@t-com.me

web: www.mans.co.me

Author:

Vanja Čalović

Podgorica, 2015

CONTENTS:

INTRODUCTION 4

1. About MANS 5

 MANS Advisory Board 6

2. KEY ACHIEVEMENTS IN 2014..... 7

3. ACTIVITIES IN 2014..... 8

 3.1. Corruption..... 8

 3.1.1. Elections 8

 3.1.2. National Parliament 13

 3.1.3. Policies against Corruption & Organized Crime..... 14

 3.1.4. Privatization 15

 3.1.5. Public finances 17

 3.1.6. Public Procurements..... 18

 3.1.7. Energy sector 19

 3.2. Organized Crime 20

 3.2.1. Regional Investigative Stories..... 20

 3.2.2. Judiciary 21

 3.3. Transparency of Institutions and Active Public Participation 21

 3.3.1. Freedom of Information..... 22

 3.3.2. Free legal aid to citizens 25

4. Public Relations 26

5. Organizational Development..... 28

6. Finances 29

Annex: Main Publications and Reports 30

INTRODUCTION

The Network for Affirmation of the NGO Sector - MANS is a leading anticorruption advocate in Montenegro and the largest NGO in the country.

During 2014 we monitored elections and reported thousands of irregularities that raised awareness of local public and international community of legality of the election process.

MANS provided free legal aid to citizens reporting us hundreds of cases of corruption. We revealed a number of high level corruption cases which lead to criminal investigations and court cases. This year we have further increased transparency of public institutions, especially privatization process.

We participated in development of anti-corruption legislation and policies, and initiated use of parliamentary control mechanisms to hold the government more accountable. We provided a room for discussion of all stakeholders on the most relevant anticorruption issues.

Our team revealed links between high level officials and organized crime through regional investigations. We also developed the first ever analyses of judicial verdicts for organized crime.

This Annual Report is published in order to promote our achievements and activities in 2014 and contribute to transparency of our work. The first section provides information on our strategic goals and objectives. The second part points out our key achievements, followed with information on specific activities. Our relations with media are presented in a separate chapter, and information on organizational development is also provided. The last chapter is dedicated to finances and it provides information on the budget expenditures and structure of donors.



Transparency International's
Partner for Montenegro



The Organized Crime and Corruption
Reporting Project's
Partner for Montenegro



FOIANet



Member of Global Network of Domestic Election Monitors
Member of Freedom of Information Advocates Network
Allies to Task Force on Financial Integrity and Economic Development
Member of network of NGOs against transnational organized crime

1. ABOUT MANS

MANS is a non-governmental organization that supports sustainable development of Montenegro through fight against corruption and organized crime, by making governance more transparent, accountable and responsive to citizens' needs and stimulating citizens to take actions and exercise their rights.

Strategic Goals and Objectives for 2013-2015

1. Reduce High Level Corruption

- ~ Increase investigations and convictions for high level corruption cases
- ~ Improve anticorruption legislation and policies
- ~ Secure implementation of anticorruption legislation, policies and control mechanisms for all branches of governance in order to produce concrete results

2. Reduce Opportunities for Organized Crime

- ~ Reveal more concrete cases of high level organized crime
- ~ Increase number of investigations and court proceedings for cases of high level organized crime
- ~ Improve legislation and policies in order to reduce opportunities for legalization of the proceeds of crime

3. Increase Transparency in Areas Prone to Corruption and Organized Crime

- ~ Improve access to information that can help uncover corruption and organized crime
- ~ Use Parliamentary mechanisms to increase transparency of all branches of governance
- ~ Ensure that more information is published in response to requests for information filed by citizens, journalists, NGOs and entrepreneurs

MANS Advisory Board

In 2014 we established Advisory Board composed of nine experts in several areas, with large experience in many countries:

- **Edwin Rekosh**, President and Founder of PILnet, Global Network for Public Interest Law with headquarters in New York, and Professor at Columbia Law School and Central European University.
- **Cornelius Adebahr**, Associate in the Europe Program at the Carnegie Endowment for International Peace in Washington, DC, Associate Fellow at the Research Institute of the German Council on Foreign Relations.
- **Paul Radu**, Executive Director of the Organized Crime and Corruption Reporting Project, co-creator of the Investigative Dashboard concept.
- **Boris Divjak**, Director of Anti-Corruption Resource Centre U4 and Distinguished Research Fellow at the Adriatic Institute of Public Policy headquartered in Croatia.
- **Vera Devine** is an independent anticorruption expert who has been working on anti-corruption issues since 2001, for many international organizations in 25 countries around the world.
- **Marie Månson** is heading a department that develops and provides targeted support to human rights defenders at risk within the organization Civil Rights Defenders based in Sweden.
- **Michael Karanicolas** is Legal Officer at Centre for Law and Democracy from Canada specialized for right to information and freedom of expression.
- **Conny Abel** works for Transparency International Secretariat where she is responsible for coordination of activities in the Western Balkans.
- **Pippa Gallop** is a Research Coordinator at CEE Bankwatch Network specialized for Southeast European energy projects.

2. KEY ACHIEVEMENTS IN 2014

Improved legal framework on voters' registry, election and political party financing, with increased transparency, strengthened complaint procedures and oversight mechanisms, and reduced opportunities for misuses of public funds and voter registries.

The European Commission requested institutions to investigate and, where necessary, prosecute allegations surrounding the municipal elections, following our advocacy campaign based on over 11.500 election irregularities related to misuses of public funding, voter registry and the Election Day, identified and reported to institutions.

The Parliament of Montenegro used more control mechanisms to hold the government accountable, and acted upon our four initiatives. **Revealed links between members of the Government of Montenegro and organized crime structures and money laundering schemes** through government loans provided to companies owned by organized crime.

Police and prosecution initiated investigations for **money laundering and tax evasion** in construction and real estate market following our investigations and criminal complaints.

Improved legal framework on **conflict of interest of public officials, whistleblower protection, composition and competences of the Agency for Fight against Corruption**, after our proposals for the new Law on Prevention of Corruption were adopted.

More than 750 citizens used our free legal aid to report corruption, which is over 50% more than in the previous year. **Improved access to public information** by submission of more than 15.000 requests for which we obtained responses in every third case; over 6.000 complaints with over 90% decisions in our favor; and 160 complaints to the Court with over 60% of decisions in favor of transparency.

Information on 180 privatized companies was made accessible to public, following extensive data collection and strategic litigation, through field events, presentation to high level stakeholders and online. **Five local NGOs are able to monitor implementation of laws and policies relevant for the fight against corruption and advocate for improvements**, due to our capacity building and mentoring.

More than 70 businesses participated in discussions on the new Law on Public Procurement through consultative events organized by MANS.

3. ACTIVITIES IN 2014

3.1. Corruption

3.1.1. Elections

In 2014 we participated in development of election-related legislation and monitored local elections held in 12 municipalities.

We conducted comprehensive analyses of election legislation, primarily regarding political party financing and voter registration, as well as its implementation. We collected best practices from several countries and provided nearly 130 concrete proposals in two policy briefs that were distributed to all stakeholders.



In order to stimulate dialogue on the best solutions, we organized a Conference that brought together all stakeholders including high level officials from the Parliament and a round table dedicated to political party financing.

We participated in a Parliamentary working group that developed new laws and closely cooperated with foreign experts and representatives of international community.

Our representatives also presented those recommendations at the sessions of two Parliament's committees. Finally, the Parliament adopted amended laws that incorporated majority of our recommendations.

We conducted an awareness raising campaign on the importance of accurate Voter Registry and promoted mechanisms for reporting violations of election-related legislation.

We published nearly 200 press releases and paid media advertisements, and we disseminated a variety of printed materials through 50 info corners in 12 municipalities. We developed a special web site www.izbori.se to present information on elections.

The campaign was also present on social networks, predominately Facebook and Twitter, hitting over 12.000 social networks friends and followers, just in the first wave (shares and re-tweets not included).



MANS developed a **secure online platform** and android application for reporting election-related irregularities www.prijavikorupciju.me.

Over **370 citizens reported concrete cases** to MANS, which we further investigated and submitted nearly 80 criminal complaints and initiatives to responsible institutions.

We **monitored public expenditures of 300 institutions prior to the elections**. In order to obtain information we submitted over 14.000 freedom of information requests, nearly 6.000 complaints and appeals. Throughout the year we obtained about one third of all requested information.

Based on the information provided from citizens and documents obtained from institutions we developed and published more than **50 investigative stories**, each dealing with a particular case of political corruption.

We analyzed collected information and submitted over **100 initiatives to the prosecutor's office and other responsible institutions**. In addition we submitted two initiatives for control hearings before relevant Parliament's committees.

One was revised by the Committee but no concrete decisions were made, while discussion on the second initiative was obstructed by representatives of the major governing party.

Over 150 MANS volunteers conducted **field validation** of over 8,000 entries in the **voters' lists** following special training.

On the basis of their findings and analysis of voter registries in the last ten years and other available information, we submitted over **9.000 initiatives to the Ministry of Interior**.

The Ministry did not act upon the initiatives; therefore we submitted cases to the Administrative Court and the Supreme Court that ruled in our favor.

MANS endorsed the Declaration of Global Principles with internationally recognized norms and standards for organizations monitoring elections and became a member of the Global Network of Domestic Election Monitors.

Following our public advertisement and distribution of awareness raising materials, **over 1.600 citizens** expressed interest in observing elections in the capitol city, Podgorica.

We provided these volunteers with three types of **trainings** and selected the best volunteers to observe the Election Day.

Our **550 observers** conducted a pilot monitoring of the voting process at **197 polling stations** where **over 90% citizens of Podgorica have the right to vote.**

They monitored all the stages of the election process, including preparation and opening of the polling stations, voting process, voting by letter, closure of the polling stations and counting of ballots, and determining the results of voting in the polling stations.

For the first time in Montenegro one NGO monitored elections in prison as well as voting by letter procedure implementation.

The observers identified, documented and reported **840 concrete violations.** We submitted all these cases to responsible election commissions, but all of them were rejected by all responsible institutions.



We developed a **bilingual report** on the Implementation of Electoral Legislation composed of three main components: Election Day, Voters' Lists and Political Party Financing and Misuses of Public Funds and Office.

In addition, we produced a **short documentary** with our observers describing the main irregularities they witnessed.

The report and the documentary were distributed to over 4.100 stakeholders and to general public through press conferences and press releases.

Following the elections we organized a **round table** where all stakeholders **discussed concrete shortcomings** in the electoral legislation and obstacles in its implementation.

Following the elections we again participated in the Parliament's working group that developed a **new law regulating election financing**.

Finally, **the European Commission** in its latest Progress Report on Montenegro called for institutions to investigate election irregularities and requested proper implementation of election regulations.

Following the elections, MANS was under enormous pressure of the largest political party and affiliated media.

One tabloid conducted a **smear campaign** against MANS Executive Director with 51 cover pages published in several months.

The campaign was condemned by many institutions, almost all political parties, international organizations, embassies and NGOs.

The Parliament of Montenegro condemned the campaign and initiated changes of the Law on Media.

The Ombudsman claimed it represents violation of human rights, while the court forbade distribution of 16 articles judging they offend public morale and violate human rights.

Representatives of the European Parliament, Delegation of the European Commission in Montenegro, the Council of Europe, the Organization for Security and Cooperation in Europe, the US Embassy in Montenegro and the United Nations condemned the smear campaign.

Open Government Partnership International Expert Panel, Transparency International, Article 19, Access Info Europe, Civil Rights Defenders and many other international organizations also reacted.

Local Trade Union of Journalists, the Journalists Regulatory Body, but also the Independent Association of Journalists of Serbia, the Center for Investigative Reporting in Serbia and the Organized Crime and Corruption Reporting Project condemned the attack, stating it is violation of ethical codes of journalists.

Many local and NGOs from the region condemned the campaign asking the government to protect civil rights activists.

Local NGOs and journalists organized several public events and online campaigns.



In addition, during the pre-election campaign, the government-owned print media, “Pobjeda” daily, refused to publish any reaction to very negative statements regarding MANS.

We submitted over 30 cases to the court for violation of the Law on Media. In more than 20 cases final judgments were made in our favor, while others are still pending.

3.1.2. National Parliament

During 2014 we observed all plenary sessions and sessions of parliamentary committees dealing with anti-corruption issues and collected data on activities of the Parliament and its members. During this period our team monitored 72 days of plenary sessions and 36 sessions of working bodies.

We put special emphasis on sessions dedicated to the use of control mechanisms by the parliamentary working bodies and sessions of the Anticorruption Committee. During this period, MANS submitted five initiatives to the parliamentary working bodies asking for use of different control mechanisms¹. The committees acted upon our four initiatives and requested information from responsible institutions, while one is still pending.

MANS also provided assistance to four CSOs to address relevant Parliament's committees. One of the initiatives was revised and institutions requested additional information from relevant institutions, while the rest are still pending.

We proposed 163 amendments to eight laws discussed by the Parliament through cooperation with MPs from different political parties and 11 of them were adopted .

MANS representatives were invited to participate at 16 sessions of parliamentary working bodies and 17 sessions of the Working Group for Building Trust in the Election Process.

¹ Initiatives were related to: buying of ID cards in the pre-election period and activities of the Prosecutor's Office and the Police in revealing corruption in privatization processes (Anticorruption Committee); Misuse of the state-owned Montenegro Airlines for bringing voters of the ruling party to Montenegro to vote, free of charge (Economy, Finance and Budget Committee); More active engagement of the Parliament in innovation of the 23rd and 24th Chapters (European Integration Committee), Environmental situation in town of Pljevlja (Tourism, Agriculture, Ecology and Spatial Planning Committee).

3.1.3. Policies against Corruption & Organized Crime

Throughout 2014 MANS monitored implementation of the **Action Plan for fight Against Corruption and Organized Crime** and the action plans for Chapters 23 and 24.

We also participated in public debates on revision of action plans for Chapters 23 and 24 and provided 38 proposals for improvements of reforms planned by these documents.

MANS' representatives participated in the **National Commission** responsible for implementation of the Action Plan. Following our initiative, the National Commission discussed the European Commission Progress Report on Montenegro for 2013 and our proposals for improvements.

MANS participated in the working group for development of the **Law on Prevention of Corruption**. We submitted several sets of comments during the drafting procedure and most of them were adopted.

However, the Government changed the version developed by the working group and we submitted amendments to the law to the Parliament.

We also provided comments to four other anti-corruption laws to the Government².

During 2014 MANS was engaged in the research of the **Government's Defense Anti-Corruption Index**, which is the first time that such research was conducted in Montenegro. Results of this research will be published in 2015.

We also started research of the **National Integrity System** with the Transparency International. This research includes analysis of legislative and institutional framework of state institutions, as well how provisions of laws and other acts are implemented in practice.



Representatives of all three branches of power participated at our National Conference, together with foreign experts, including the famous undercover Federal Bureau for Investigations' agent and former German General Prosecutor.

²Comments to the draft laws on Administrative Inspection, on Special State Prosecution, on the Constitutional Court and on Criminal Proceedings.

3.1.4. Privatization

In order to increase transparency and accountability in privatization process during 2014 we collected information on almost 180 privatized companies in Montenegro, organized public events and provided free legal assistance to workers to address possible corruption cases to relevant institutions.



Description of each privatization and all collected information, such as privatization contracts, investment plans and other available documents, are posted at a special section of our web site.

We organized info corners in nine municipalities, presenting citizens with devastating effects of privatization through photos of privatized companies. The info corners were attended by hundreds of citizens that provided us with further information on their companies.

We also organized a photo exhibition at our VIII National Anticorruption Conference to raise awareness among high level stakeholders from the government level and the international community.

At the Conference best practices in fighting corruption in privatization were presented by Head of the Department for Economic Crime and Corruption of the Ministry of the Interior of Croatia.



During 2014 we submitted an initiative to the Anticorruption Committee to discuss the failure of the prosecutor's office on the criminal complaint of workers of 29 companies from the north of Montenegro, which was filed in 2012.

We also investigated several large privatizations and submitted criminal complaints to the prosecutor's office.

MANS revealed documents related to privatization of the **Aluminum Plant of Podgorica** (KAP), the largest company in the country, showing that the company was sold for 28 million even though its assets were previously valued at 52 million euros.

We revealed that the Government provided the investor at very attractive tourist site **Queen's Beach** located on the coast, with benefits that are contrary to the public interest, law and the Constitution.

We shared the findings with the public and MPs inviting them to reject verification of this contract in the Parliament of Montenegro.

Our investigative team discovered that the privatization of the **Container Terminal** in the country's largest port, the **Port of Bar**, was conducted at the expense of public interest.

In the final round of negotiations with the Turkish partner, the Government of Montenegro waived the investor's obligations to provide bank guarantees for the investment, while the investment plan was changed in favor of the new owner³.

³The new investment plan defines for the investor only the obligation to invest into the equipment that can be removed and taken out after the concession period is over. In such manner, the investor rather invests in himself than into the Container Terminal Company.

3.1.5. Public finances

In year 2014. MANS investigated the largest financial arrangements in recent history of the country related to construction of a highway, but also tax collection and financial management in several institutions.

The Government signed a contract with the State Bank of China for the loan worth close to one billion US\$ regarding the **construction of part of the highway Bar-Boljare**, and contract for construction works with a preselected Chinese company. The Government proposed the Law on Highway to the Parliament, but didn't provide any information on the financial sustainability and feasibility of the overall project.

We discovered that the preselected construction company is at World Bank's blacklist for possible corruption. The Ministry of Transport refused to publish relevant feasibility studies upon our request. We obtained them from a whistleblower and published the findings showing that the current solution for the highway is not financially justified, while also offering alternative solutions. MPs from the ruling parties adopted the law, and we submitted an initiative to the Constitutional Court to assess its legality, but also a criminal complaint against responsible ministers.

We investigated **collection of VAT in the gambling industry** as this sector is frequently publicly associated with organized crime structures in Montenegro. In 2013 the Parliament adopted amendments to the Law on VAT defining tax on gambling gains.

Our investigation has shown that a year later not a single euro was collected. For poor enforcement of law in this area and significant loss to the state budget on account of uncollected taxes, MANS submitted a criminal complaint against Director of the Tax Authority. In cooperation with the local NGO Mogul from Ulcinj, MANS analyzed financial affairs of the **Public Enterprise for the Coastal Zone Management** and discovered that over five million euro dedicated to investments in coastal zone was spent for other purposes. We submitted criminal appeal against responsible individuals.

MANS discovered that **the state Investment Development Fund** provided loans to companies associated with the ruling political party, even though they did not fulfil financial requirements.

We also discovered that this institution's funds were used for political promotion of the candidate of the ruling political party during local elections. We submitted criminal complaints to the prosecutor's office.

3.1.6. Public Procurements

Throughout this year we participated in a regional project related to public procurements through which we developed a baseline survey of the legal framework, analyzed concrete cases and compared them among countries, organized consultations with businesses and proposed changes to the new Law on Public Procurement.

We developed a **baseline survey** which included an analysis of the Montenegrin legal framework in the area of public procurement, as well as fact sheets from the practical implementation of the Law.

MANS conducted an in-depth **analysis of 14 public procurement cases** and developed case studies.

In cooperation with partners from the region, we developed comparative analyses of public procurement practices in Serbia, Montenegro, Bosnia and Herzegovina and Macedonia.



We conducted a **business sector survey** to collect information on the most problematic practical experiences, and over 70 large, medium and small enterprises were interviewed all over Montenegro.

Following that, we organized a **round table** that gathered over 70 representatives of contracting authorities, MPs, private sector, regulatory bodies, inspections and media.



At the round table we discussed concrete obstacles in the current legislation and its shortcomings, but also the new legal framework submitted to the Parliamentary procedure by the government.

Based on the collected information and analyses, we developed 46 amendments to the draft Law on Public Procurement.

The amendments were submitted to the national Parliament procedures by MPs from different political parties. However, only one of the proposed amendments was adopted by the Parliament.

3.1.7. Energy sector

We investigated operations of the national power supply company (EPCG) and discovered that the new owner did not fulfill its obligations of the five-year management contract.

We found out that the new owner extracted over 15 million euro from EPCG through contracts for consultancy services with sister companies. We revealed documents showing that the EPCG management board, supported by the responsible public officer, presented inaccurate data of annual energy balances and forecasts of consumption, which led to an increase of electricity prices.

We submitted a criminal complaint to the Prosecutor's Office, but it is still pending.



Upon our initiative, the Parliament's Anticorruption Committee discussed our findings at a special session where our participants provided MPs with more detailed information. The Committee requested additional information from the Prosecutor's Office and the Police.

In 2014, we managed to secure the status of the "interested party" in the process of project development of underwater interconnection energy transmission line between Italy and Montenegro, as well as in the project for the development of the second facility of the Pljevlja coal-fired thermo plant.



Using that right, we initiated strategic litigation before the Administrative Court against the Agency for Environmental Protection of Montenegro in order to obtain all relevant documents related to the Strategic Environment Impact Assessment for the underwater interconnection cable with Italy.



Through the regional project aimed at strengthening civil society voice in South East Europe energy policy development, MANS participated in the development of the Regional Red Flag Report on Corruption in Energy Sector, presenting two case studies from Montenegro. The report was presented to decision makers, public and the media during the Sustainable Energy Week in Brussels, Belgium.

3.2. Organized Crime

3.2.1. Regional Investigative Stories

In partnership with the network of investigative journalist "Organized Crime and Corruption Reporting Project" (OCCRP), in the first half of 2014, we published the Dossier "**Unholy Alliances - How Organized Crime, Government and Business interact in Montenegro**"⁴.

The dossier was composed of five stories that were published online and in several media in the region.

Banks, money laundering, cocaine, exotic resorts, tobacco smuggling and politics are the highlights of the stories that provide actual and hard evidence of connections between organized crime structures and the Montenegrin

government. Through a series of stories, we presented a complex scheme gathering criminals and Montenegrin high level politicians and their families, used for money laundering through construction projects, bank loans, but also for narcotics and tobacco smuggling.



Unholy Alliances

Montenegro has long desired to become a Balkan Monte Carlo.
But instead it has become something unique in the Balkans:
a crime state.

After this dossier, MANS published additional three investigative stories describing ties of particular high level officials with cocaine smugglers. Using documents collected during this several-month investigation, MANS submitted three criminal complaints against the key players, including government officials, criminals and politicians.

Based on these criminal complaints, the Special Prosecutor initiated investigation in late 2014.

During 2014, MANS also investigated another organized crime boss accused for **heroin smuggling**.

Based on the obtained documents on financial affairs of the companies owned and connected with his organized crime structure, we discovered how **illegal money was laundered** due to loans provided by the government and lack of oversight of the Anti-money Laundering Agency.

⁴ <https://reportingproject.net/unholy-alliances/>

3.2.2. Judiciary

MANS analyzed final judicial rulings for organized crime and published the first ever analyses of such kind in the country.

The purpose of the analysis was to objectively overview the influence of the legal and institutional framework, as well as the results of the judiciary in the fight against organized crime, to determine what is behind the official statistical data and effects of implementation of new legal provisions.

We analyzed the **legal framework relevant for the fight against organized crime** and discovered that many new pieces of legislation are in favor of the persons accused of money laundering and the most severe narcotics smuggling offences with elements of organized crime.

MANS collected all judicial rulings and analyzed **problems in court proceedings due to the frequent changes of the legislation.**

Special part of our analyses was focused on revealing what types of cases are behind the official statistics.

We also analyzed **effects of international cooperation** on concrete examples of narcotics smuggling and compared **penal policies**. The analyses have shown that proceedings before Montenegrin courts last much longer, and their penal policy for international narcotics trafficking is much more lenient than the practice of courts in other countries.

The duration of proceedings, law amendments in favor of accused persons and the extremely lenient penal policy of courts allow for persons dealing with international narcotics smuggling to be convicted to sentences more lenient than their subordinates.

On the other hand, in the rulings against persons who are mainly narcotics users and addicts, and who do not sell narcotics in an organized manner, courts impose much stricter sentences.

Effects of the use of secret surveillance measures and practical implementation of new legal institutes, the **cooperating witness and the protected witness** were also analyzed on the basis of concrete cases. Finally, we presented problems in access to data, specifically court rulings and case files.

The analyses were presented at the National Conference and distributed to all stakeholders including general public through media.

3.3. Transparency of Institutions and Active Public Participation

3.3.1. Freedom of Information

Since the adoption of the first Freedom of Information (FOI) Law in Montenegro in 2005, MANS has been monitoring implementation of this key anti-corruption piece of legislation and has extensively used it to obtain data which support our operations, especially in relation to the investigation of concrete cases of corruption and organized crime. We also provide free legal assistance to citizens, NGOs and journalists to obtain information.

In the 2005 - 2014 period, we submitted 75 thousand FOI requests, over 22 thousand complaints to the responsible authorities and over 9.5 thousand appeals to the Administrative Court and the Supreme Court.

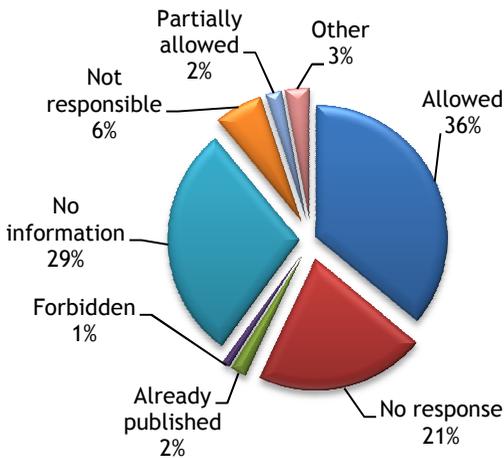


Chart 1: Responses to FOI requests in 2014

In 2014, MANS submitted over **15,000 FOI requests**. In every third case, access to information was granted.

During this year we submitted over 6,000 complaints to the Agency for Personal Data Protection and Freedom of Information. The Agency decided in less than half of complaints, and in over 90% of cases their decisions were in favor of transparency.

MANS submitted over 160 complaints to the Administrative Court. They have decided in one third of cases, and 60% of decisions were in our favor.

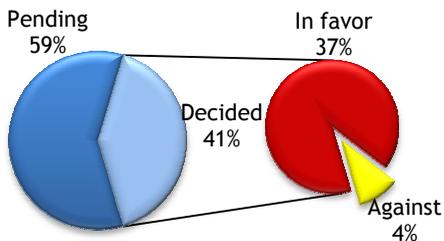


Chart 2: Decisions of the Agency

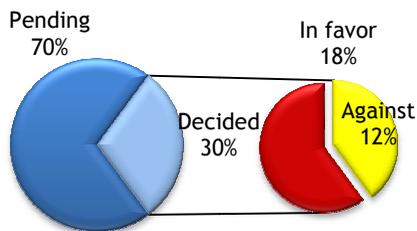


Chart 3: Decisions of the Administrative Court

In 2014 we focused on increasing transparency of public expenditures, strategic litigation regarding electronic submission of FOI requests, provision of free legal aid to citizens and capacity building of other NGOs to use FOI as a tool to hold the government more accountable.

MANS monitored expenditures of public institutions prior to the local elections in order to determine whether public funds were misused to influence election results. In relation to that we submitted over 6,000 FOI requests to state authorities and institutions in 12 municipalities, and every fourth request was ignored.

Many institutions claimed that a **detailed review of their daily expenditures** should not be accessible to public. However upon our complaints, the Agency decided that such **information must be public**.

Following decisions of the Agency, institutional practice changed and we managed to access that information from 15 institutions.

Following our initiative, the first ever decision was made confirming that FOI requests might be submitted via email. We have submitted a set of FOI requests using e-mail and submitted electronic complains in all the cases when institutions provided no response.

The Agency decided in our favor, and therefore confirmed that requests for information could be submitted electronically. Until this decision, all requests had to be submitted in person or via post, which significantly increased costs for accessing information.

We provided **free legal aid** to CSOs, citizens and journalist and organized many public events in several municipalities to present citizens with their right to information and provide them with assistance in submitting requests to institutions. We also organized street activities to celebrate the International Right to Know Day.



We developed capacities of five NGOs to use FOI Law to be able to monitor implementation of laws and policies, and operations of various institutions.



Throughout 2014 we assisted them in using all available legal mechanisms to obtain information and they submitted over 600 FOI requests and 200 complaints to the Agency. Through our cooperation, those NGOs established effective monitoring in the field of their operations, using credible official information obtained through FOI requests.

NGO **MogUL** monitored illegal building in the south coastal zone of Montenegro and expenditures of the institution responsible for the management of the coastal line zone. NGO **Stecajci** monitored privatization process in the northern region, with special emphasis on the privatization through liquidation of state-owned companies.

NGO **Women's Safe House** monitored operations of the implementation of law in the area of trafficking of human beings. NGO **Youth Association** performed monitoring of the financial management of the University of Montenegro.

NGO **Breznica** monitored environmental situation and pollution in the most endangered Montenegrin municipality in the north - Pljevlja

Their findings were published in **10 monitoring reports** which pointed out key deficiencies in specific fields, and provided recommendations for improvements. We also assisted our partners in distributing these reports to stakeholders.

In cooperation with MANS, those NGOs submitted **four initiatives to the Parliament** asking for changes of concrete laws, policies and practices which have shown to be ineffective or inadequate during the monitoring process.

We also held **four trainings for 25 other NGOs and journalists** to present them with basics in implementation of the FOI Law.

3.3.2. Free legal aid to citizens

Throughout the year we provided citizens with free legal advice in reporting corruption.

We maintained the SOS phone line, online forum and a special online platform⁵ and android application, and organized meetings with citizens.

During 2014, we received 763 reports from citizens, over than 50% more than in 2013.

We processed over 550 cases, submitted over 100 criminal complaints and 37 initiatives to different responsible institutions.

We provided citizens with free legal assistance in obtaining information from responsible institutions, reported cases to relevant inspections, police and the Prosecutor's Office.

The table below shows the structure of reports by different areas.

Thematic area	Reports
The electoral process	376
Employment	56
Urbanism	35
Judiciary	18
Privatization	18
Consumers	16
Local government services	8
Conflict of interest	7
Public procurement	6
Education	6
Prosecutors office	5

Table 1: Structure of citizens' reports

Cases involving high level officials were presented in the media and we advocated for changes in the existing laws and/or practices as well as for prompt reaction of responsible institutions.

Also, we provided legal assistance for former employees of the factory "Radoje Dakic" in Podgorica to submit an initiative to the National Parliament in their efforts to receive their salaries from the state of Montenegro.

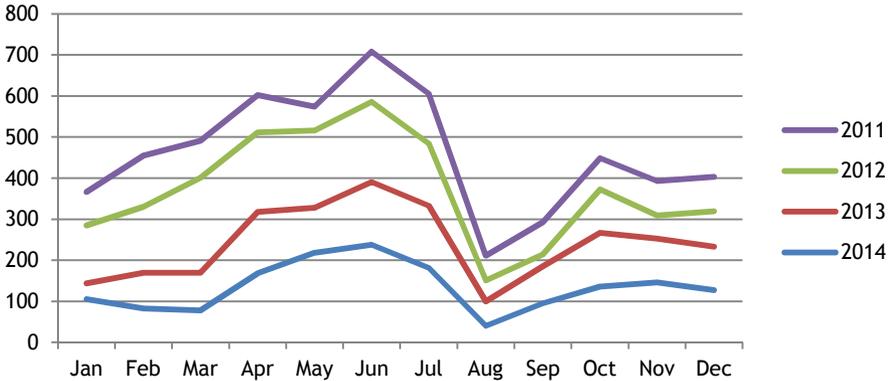
This initiative covered about 1.800 former employees. During this year we put emphasis on **security** of citizens reporting corruption.

We developed a special online platform based on Ushahidi, where user's information is completely protected because all information is encrypted and sent to a special server at a safe location.

⁵ <http://www.prijavikorupciju.me/>

4. PUBLIC RELATIONS

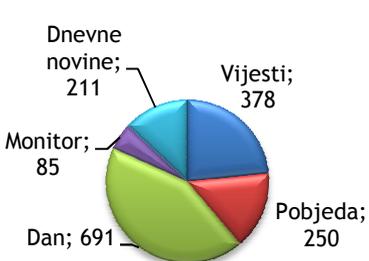
Media coverage of MANS' activities continued to significantly grow in 2014, with over 1600 articles published in the print media and over 400 TV reports.



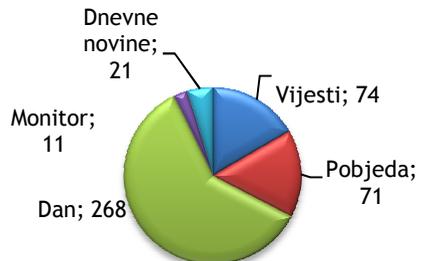
Graph 4: Number of articles in printed media by months (2011 - 14)

Dailies "Dan" and "Vijesti" continued to report on most of our activities, most frequently in a positive context, while the state-owned daily "Pobjeda" almost exclusively publishes negative articles, along with "Dnevne novine" that frequently report in a negative context.

The number of cover pages doubled, our activities were most frequently published at the cover page in the daily "Dan", the newspaper with the largest circulation in the country.

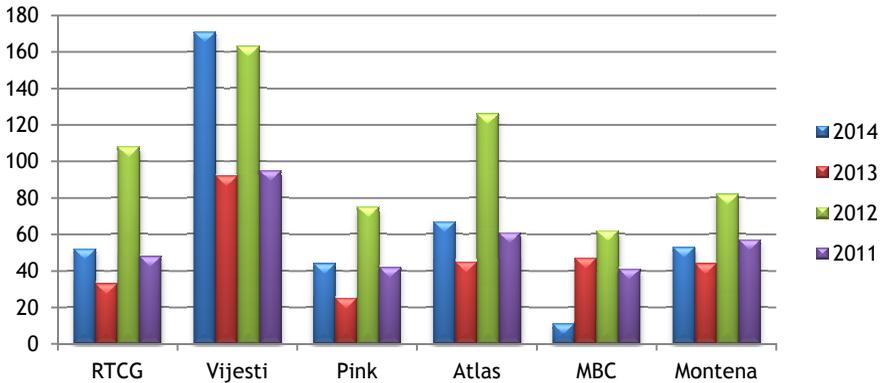


Graph 5: Number of articles by media in 2014



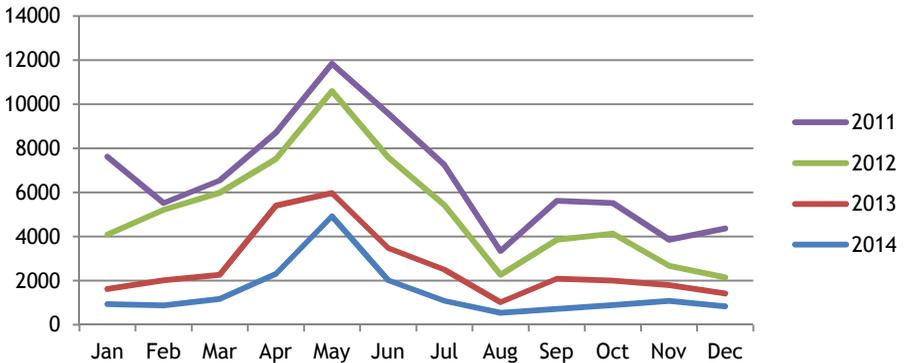
Graph 6: Number of cover pages by media in 2014

Electronic media slightly decreased the number of information on MANS activities. However, state owned TV (RTCG) mainly reported on MANS work in a negative context.



Graph 7: Number of reports at TV networks in 2011, 2012, 2013 and 2014

In 2014 almost 18.000 unique visitors loaded over 60.000 pages at www.mans.co.me. The portal www.podlupom.info was visited over 3.000 times with almost 10.000 pages loaded.



Graph 8: Unique visitors of website www.mans.co.me 2011-2014

MANS's Facebook page is followed by over 6000 people. Facebook group „MANS” has over 3500 members. We posted almost 1000 tweets and have over 500 followers.

MANS also maintains several electronic lists with close to 4000 contacts of all stakeholders, such as other NGOs, experts, decision makers, international community, media and a range of activists' movements.

5. ORGANIZATIONAL DEVELOPMENT

During this year 32 people worked for MANS. We had 26 full-time employees (46% female, 54% male) and 6 part-time employees (50% female, 50% male).

MANS is composed of four departments:

- Civic Initiatives dealing with citizens;
- Investigative Center focused on high level corruption and organized crime cases and advocacy;
- Monitoring, Analytics and Research dealing with laws and policies;
- Administration and Finances that supports other departments.

We developed human resources through a range of trainings. The most intensive capacity building was related to the use of new methodologies for policy research where we were provided with training by several NGOs from the region, the German Council on Foreign Relations (DGAP) and the Transparency International.

The whole office participated in the trainings for civic mobilization, management of volunteers and election monitoring, provided by foreign experts.

Other trainings were focused on internet investigations and data journalism, but also different use of IT technologies and visualization of data. MANS developed a special software for monitoring election financing, and an additional software for observing the Election Day and reporting irregularities.

We developed a searchable electronic database containing all the documents obtained from institutions upon over 75,000 requests for information submitted since 2005.

This database is currently used by our investigative team, but in the upcoming period it will be also posted online.

We also developed a special website based on the Ushahidi platform to be able to collect reports on corruption via text messages, email, twitter and web-form.

In this year we introduced new protocols for maintaining information and data provided by citizens, but also improved use of software for data encryption of internal communication.

6. FINANCES

In the last five years, MANS' budget expenditures were increasing. Similarly, following reorganization of internal operations and engagement of more volunteers, this year's expenditures increased by a few percent. **Our total expenditures in 2014 were 620.903,01 EUR.**

1\$= 0.863512 Euro

Cost category	Amount in €	Amount in \$
Salaries and fees	€ 243.836,54	\$ 282.377,71
Taxes and benefits	€ 170.921,55	€ 197.937,67
Office running costs	€ 72.019,33	\$ 83.402,81
Fees for consultants	€ 50.602,89	\$ 58.601,26
Cost for campaigns and printed materials	€ 41.330,60	\$ 47.863,38
Cost for organizing events	€ 13.585,38	\$ 15.732,71
Equipment	€ 4.387,42	\$ 5.080,90
Other Cost	€ 24.219,30	\$ 28.047,44
Total	€ 620.903,01	\$ 719.043,87

Table 2: MANS expenditures in 2014

For implementation of activities in the period 2014-2017 we signed contracts in the total value of 617.971,04 EUR.

1\$= 0.863512 Euro

Donor	Amount in €	Amount in \$
European Union	€ 271.898.40	\$ 314.875.07
Transparency International	€ 186.200,81	\$ 215.631,99
British Embassy in Montenegro	€ 82.604,97	\$ 95.661,64
Charles Stewart Mott	€ 55.097,22	\$ 63.805,97
US Embassy in Montenegro	€ 14.721,64	\$ 17.048,56
Embassy of Czech Republic in Montenegro	€ 3.200,00	\$ 3.705,80
European Climate Foundation	€ 2.400,00	€ 2.779,35
Access info Europe	€ 1.050,00	\$ 1.215,96
International Center for Not-for-Profit Law	€ 798,00	\$ 924,13
Total	€ 617.971.04	\$ 715.648.47

Table 3: Contracts signed in 2014

ANNEX: MAIN PUBLICATIONS AND REPORTS



Behind the Statistics 3: Analysis of court rulings for criminal offences with elements of organized crime

The analysis shows that many new pieces of legislation and their implementation are in favor of the persons accused of money laundering and the most severe narcotics smuggling offences with elements of organized crime.



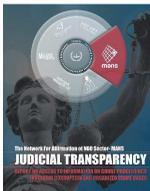
Implementation of the electoral laws

The official data and information provided by citizens and election observers show that all three election-related laws were vastly violated during the elections held in 2014, while competent institutions failed to properly address the reports of such irregularities.



Monitoring Report: Anticorruption Committee of the Montenegrin Parliament

The Report contains information on the work of the Parliamentary Anticorruption Committee and its members. It contains concrete recommendations for improvement of the Committee's work.



Judicial transparency

The report contains an analysis of statistics regarding the availability of final judgments and full case files with an overview of the rulings of individual courts, as well as information on access to non-final judgments in corruption cases and problems in accessing data.



Winners and losers - Who benefits from high-level corruption in the South East Europe energy sector?

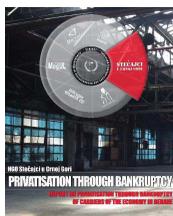
The Report provides a regional insight into corruption in the energy sectors through a series of reports on most severe cases, showing to what extent corruption is rooted in energy deals throughout the region of SEE.



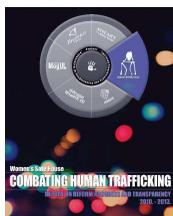
Public Procurement in Bosnia and Herzegovina, Montenegro, Macedonia and Serbia - Comparative analysis of Legal and Institutional Framework

The analysis of legislative and institutional framework of public procurement systems in several countries shows that anti-corruption dimension in shaping legislative and institutional framework.

These reports were developed by five other NGOs with our assistance:



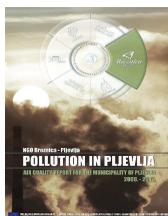
Privatization through Bankruptcy



Combating human trafficking



Coastal zone management



Pollution in Pljevlja



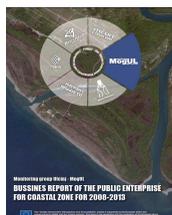
Transparency of the University of Montenegro



Destruction of Economy through Privatization



Criminal code and sexual exploitation of woman



Coastal zone Management - Financial reports for 2008-2013



Pollution in Pljevlja- Case of Thermal Power Plant



Transparency of higher education institutions

More at <http://www.mans.co.me/en/about-mans/publications/>