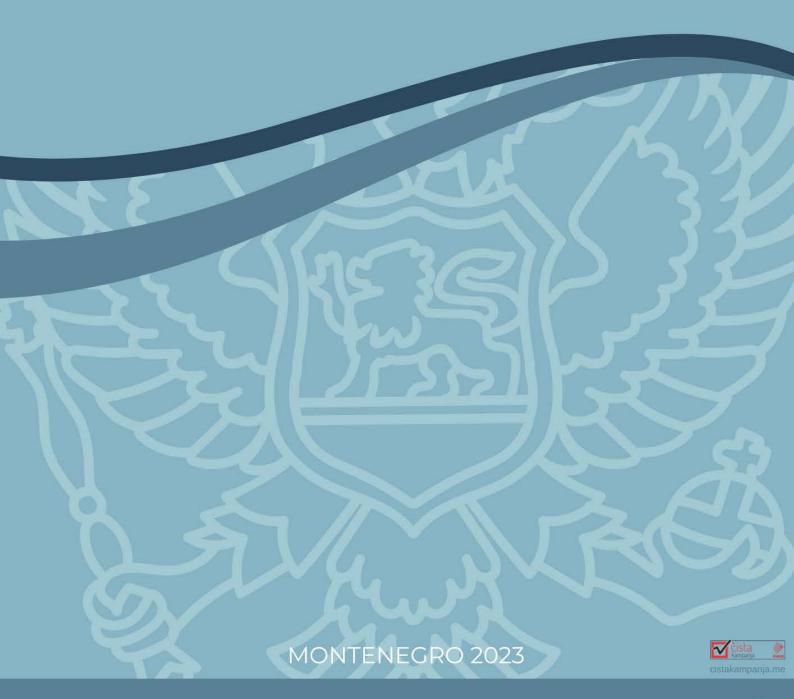
REPORT ON FINANCING ELECTION CAMPAIGNS

# PRESIDENTIAL ELECTIONS 2023







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# TITLE:

REPORT ON THE FINANCING OF THE CAMPAIGN FOR THE ELECTION OF THE PRESIDENT OF MONTENEGRO 2023

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# **EDITOR AND AUTHOR:**

Vanja Ćalović Marković

# Support:

Dejan Milovac Marijana Subotić Đovana Elezović Milena Marinović Boris Đerković Aleksandar Grum

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# INTRODUCTION

MANS monitored the financing of the campaign for the presidential elections in Montenegro held on March 19 and April 2, 2023, in which seven candidates took part.

During the election campaign, we monitored the activities of all candidates and their political parties and collected information about their promotional videos and materials, rallies and other materials. In particular, we monitored TV stations with national frequency and collected data on the advertising of each of the candidates. We also collected advertisements from print media, as well as information about advertising on certain social media.

We also collected the official reports of the candidates on the financing of the election campaign, analysed them and compared them with the data obtained through monitoring in order to identify hidden expenses. We investigated the largest campaign suppliers and their ties to the candidates and their political parties.

This document contains an analysis of official data on campaign revenues and expenses for each presidential candidate. It indicates the possible hiding of certain expenses and provides evidence that confirms their existence.

Detailed information on the official income and revenues and expenses is available at www.cistakampanja.me.

The report was prepared thanks to the financial support of the National Endowment for Democracy, but the views and statements presented in it do not necessarily reflect the views of the donor.

# **ABSTRACT**

Seven candidates took part in the presidential elections and reported **total revenues of around 1.4 million euros**. Nearly two-thirds of the declared revenues of the candidates came from the state budget.

Candidate Milo Đukanović collected the most funds, over half a million euros, and only he reported a significant amount of donations from natural persons. Jakov Milatović reported revenues of over 400,000 euros, Andrija Mandić around 140,000, and Aleksa Bečić slightly less than 160,000 euros.

# Irregularities related to campaign financing include:

- A company that participated in public procurement gave donation to one candidate,
- One candidate received donation by non-governmental organizations financed from Serbia, but those donations were refused,
- One candidate received donation by persons who were recipients of social assistance,
- Donations given by two candidates to a common candidate in the second round were not reported.

**Total** reported **campaign expenses** of all presidential candidates were **around 2.1 million euros**. Mandić spent the most, over 600 thousand euros, while Bečić and Đukanović reported over half a million. Milatović reported expenses of around 370,000 euros.

# Certain candidates concealed some campaign expenses:

- Two candidates concealed all advertising expenses on one TV station each,
- One candidate concealed all, and the other reported lower expenses of social media advertising,
- One candidate did not report the expenses of making a large number of promotional videos,
- One candidate did not report a part of the advertising material used in the campaign,
- One candidate did not report the expenses of renting rally equipment, even though he had three projection screens,
- Not a single candidate reported a single cent of phone expenses.

A month after the elections, the candidates did not pay around one million euros of the campaign expenses they had reported. The biggest debt has Mandić, around 470,000 euros, followed by Bečić, nearly 420,000. Milatović has around 75 thousand euros left to pay, and Đukanović around 13 thousand euros for officially reported campaign expenses.

No institution is in charge of monitoring whether the candidates pay their debts, and in the previous period, some significant amounts of debts were never paid, but represented hidden donations. This is why such a high amount of debts is quite worrying.

# 1. REVENUES

Seven candidates took part in the presidential elections and reported total revenues of around 1.4 million euros.

Nearly two-thirds of the total revenues of the candidates came from the state budget, donations from natural persons made up about 17%, donations from legal entities around 10%, own funds around 7%, and loans around 3%.

# **PRESIDENTIAL ELECTIONS 2023**

# **STRUCTURE OF REVENUES**



Revenues from the budget that the candidates received amount to **884,549 euros** in total.

### OWN FUNDS

Revenues of presidential candidates from own funds amounted to **91,000 euros.** 

### DONATIONS OF LEGAL ENTITIES

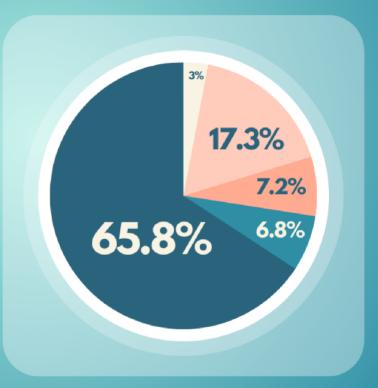
Donations of legal entities amounted to **96.595 euros**.

### DONATIONS OF NATURAL ENTITIES

Donations of natural entities amounted to **232,810 euros.** 

### LOANS

Revenues provided from loans amounted to **40,000 euros.** 



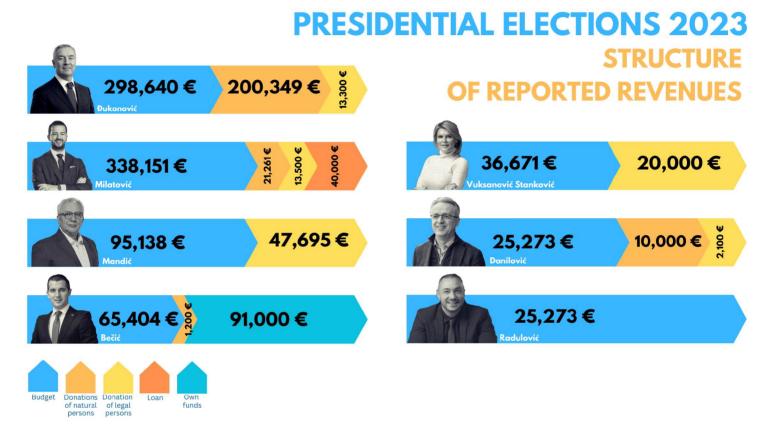
Candidate Milo Đukanović reported highest revenues, over half a million euros, followed by Jakov Milatović, over 400,000. In third place is Aleksa Bečić with slightly less than 160 thousand euros, followed by Andrija Mandić who reported around 140 thousand euros. Candidate Draginja Vuksanović Stanković reported slightly less than 60 thousand euros, Goran Danilović slightly less than 40 thousand, and Jovan Radulović 25 thousand euros of revenues.



Reported revenues in the campaign for presidential elections, by candidates

# 1.1. Structure of revenues

Budget funds are the dominant source of revenues for all candidates, except for Aleksa Bečić, who reported that he had received nearly 60% of campaign funds from his political party, while Milo Đukanović reported significant amount of donations that make up around 40% of total revenues.



Budget funds make up over 80% of the revenues reported by Jakov Milatović, of which nearly 10% refers to a three-month short-term loan from the bank Hipotekarna banka worth around 40 thousand euros, around 5% are donations from 27 natural persons, and the rest are donations from legal entities, of which the largest one is from his party.

In the case of Andrija Mandić, funds from the budget make up two thirds of the total reported revenues. The rest refers to donations from legal entities, namely, three political parties [1], two companies (Srpska kuća 20,000 and Mediteran Travel 6.7 thousand), as well as two nongovernmental organizations, which were returned by the candidate's decision. [2]

Aleksa Bečić reported that 40% of the total revenues of his campaign came from the budget, and the rest was his party's own funds, while the reported donations of five natural persons are very small.

In the case of Draginja Vuksanović Stanković, budget funds make up about 65% of the total reported revenues, and the rest refers to donations from legal entities, specifically her political party, in the amount of 20 thousand euros.

Funds from the budget make up nearly 70% of the total reported revenues of the candidate Goran Danilović, and the rest mainly refers to donations from 10 natural persons and one company (Božur LLC).

Candidate Jovan Radulović reported only revenues from the state budget.

<sup>[1]</sup> Democratic People's Party 10,000, New Serb Democracy 5,000, and Workers' Party 3,000 euros.
[2] It is about donations of 20,000 euros each by the NGO Society for Equality and Tolerance and the NGO Society for the Improvement of Political and Economic Cooperation of Montenegro, the Republic of Serbia and the Republic of Srpska.

# 1.2. Donations and contributions

**Milo Đukanović** collected a total of 213,649 euros of voluntary contributions from natural and legal persons, less than in 2018, when he had around 250,000 euros of contributions at his disposal. Part of the money for the campaign was provided by his own party, since DPS paid 13,300 euros.

The rest was provided by his party colleagues, former and current state and local officials, as well as the members of youth organisation of the party, who paid donations.

Đukanović also received donations by some party officials who previously received social assistance. In this sense, local party officials from Berane, Obrad Čantrić, Vukadin Božović and Dejan Ćorac stand out. A few years ago, they received social assistance from the Centre for Social Work in Berane, and then funded the party, i.e. its campaign . Čantrić paid Đukanović 1,950 euros this time as well, Božović paid 1,100, and Ćorac 600 euros. They all paid the money on the same day, March 29, 2023.

**Andrija Mandić** collected **47,695 eura**, exclusively from donations from **legal entities**. His campaign was funded by the Democratic People's Party (DNP) with 10,000 euros, New Serb Democracy (NSD) with 5,000 euros and the Workers' Party with 3,000 euros.

# Case study: Donation of the Srpska kuća

In addition to political parties, Mandić's campaign was also financed by "Srpska kuća" LLC Podgorica with 20,000 euros. According to data from the website of "Srpska kuća", it is stated that "the idea of a group of prominent Serb intellectuals and public employees to form such an institution was also supported by the Prime Minister of the Republic of Serbia, Aleksandar Vučić". It is added that a business premises for the company in the centre of Podgorica was purchased and equipped with a donation from the Serbian Government. [5] Among the founders of this company, which operates as a limited liability company, are several officials of the Democratic Front and people close to that political movement.

In addition to the financial contributions listed, Mandić reported that he had also received four services worth nearly 10,000 euros, from the companies "Mediteran Express" and "Mediteran Travel".

<sup>[3]</sup> The exact amount is 254,183.07 euros.

<sup>[4]</sup> See at: https://www.mans.co.me/en/?p=8311;

https://www.mans.co.me/en/?p=7093; https://www.mans.co.me/socijalni-slucajevi-finansirali-kampanju-dps-a/ .

<sup>[5]</sup> See at: https://srpskakucacg.me/o-nama/.

### Case study: Donations of NGOs financed from Serbia

According to fifteen-day reports on contributions in the campaign, Mandić also received 20,000 euros each from the Society for Equality and Tolerance and the NGO Society for the Promotion of Political, Cultural and Economic Cooperation of Montenegro, the Republic of Serbia and the Republic of Srpska, which is expressly prohibited by the Financing Law of Political Entities and Election Campaigns, which stipulates that NGOs cannot finance political entities and their campaigns. According to the official report, Mandić refused those donations.

The Society for Equality and Tolerance is listed by the Agency for Electronic Media of Montenegro as a broadcaster of the general TV programme of the "Srpska TV". [6] In the last few years, that NGO received money from the Office for Cooperation with the Diaspora and Serbs in the Region of the Republic of Serbia, for the production of various TV shows. [7] This NGO also received money from the Fund for Minorities of Montenegro, from which it received over 1.1 million euros in the period from 2009 to 2017.

According to data from the Register of NGOs of the Ministry of Public Administration, the NGO Society for the Promotion of Political, Cultural and Economic Cooperation of Montenegro, the Republic of Serbia and the Republic of Srpska was founded in 2019 by several natural persons, one of whom is Vladislav Bojović, former member of the Democratic Front in the Parliament of Montenegro, who is also the acting director general of the Directorate for Payments of the Ministry of Agriculture, Forestry and Water Management of Montenegro. [8]

According to publicly available data from the website of the Revenue and Customs Administration, the Society for the Promotion of Political, Cultural and Economic Cooperation of Montenegro, the Republic of Serbia and the Republic of Srpska achieved a modest turnover in 2022, while the Society for Equality and Tolerance has not yet published financial statements for the previous year. [9]

[7] See at: https://dijaspora.gov.rs/files/3/Odluka-region-2022.pdf .

<sup>[6]</sup> See at: https://aemcg.org/wp-content/uploads/2022/11/02-1643-Upozorenje-Srpska-TV.pdf.

<sup>[8]</sup> See at: http://pvnovine.com/wp-content/uploads/2020/07/%C4%8Clanovima-Odbora-Parlamentarne-skup%C5%A1tine-Savjeta-Evrope.pdf .

<sup>[9]</sup> In 2022, the Society for the Improvement of Cooperation made a loss of 7,325 euros (had no revenues), while there is no published statement for the Society for Equality and Tolerance for 2022. In 2021, they made a profit of 25 euros, with a higher turnover.

Jakov Milatović collected 34,761 euros in donations and contributions. He received most donations from the members of the Europe Now Movement, but he also received a service of 1,000 euros from the company "Centroslavija" [10], 200 euros from the company "Projektsilva", as well as a non-financial contribution in the form of products from the company "Padrinomont" from Bar, in the amount of 300 euros.

### Case study: A company that participated in public procurement gave donation

In the last two years, the company "Centroslavija" concluded public procurement contracts with several local and state institutions, worth around half a million euros, which, in accordance with the provisions of the Law on the Financing of Political Entities and Election Campaigns, disqualified it as a donor for the campaign of Milatović. However, unlike Mandić, who allegedly refused the disputed donations, in the Campaign Expenses Report submitted by Milatović, the unlawful donation from the company "Centroslavija", was properly recorded and reported to the APC in the form of a service worth 1,000 euros.

The largest donation was provided by his own party - Europe Now Movement, 12,000 euros in March, i.e. only two days before the end of the election race, i.e. the holding of the second round of elections.

# Case study: Donations from other candidates in the second round

Candidates Mandić and Bečić supported Milatović in the second round and paid for the rental of billboards on which they called on citizens to vote. According to the DF's data, that coalition supported Milatović with 140 billboards [11], while the Democrats' data says that they gave him 160 billboards. [12]

Milatović did not report donations from those candidates or their parties. Based on the available data, it is not possible to determine whether Mandić and Bečić stated in their reports the expenses of printing and billboards advertising related to the second round of elections and the common candidate.

<sup>[10]</sup> Particularly problematic because of the restrictions from Art. 33, paragraph 5 of the Law on the Financing of Political Entities and Election Campaigns (concluded public procurement contracts).

<sup>[11]</sup> https://www.standard.co.me/politika/df-predstavio-bilborde-podrske-da-pobijedimo-mila-djukanovica-glasamo-za-milatovica/ . [12] https://www.vijesti.me/vijesti/politika/650325/milatovica-guraju-i-rijecima-i-djelom .





8:19 pm · 24 Mar 2023 from Crna Gora · 32.6K Views

Excerpts from social media with data on the number of billboards of the Democratic Front and the Democrats calling for voting for the common candidate Milatović in the second round

**Draginja Vuksanović Stanković** reported only donations from her party, SDP, in the amount of 5 and 15 thousand euros.

**Goran Danilović** collected 12,100 euros in financial and non-financial contributions for his election campaign. He was supported by nine officials of his party, and he himself made a donation. On March 13 and 14, 2023, a few days before the first round of elections, all of them paid amounts of 1,000 euros each. [13] In addition to the money, Danilović also reported the service he had received from the company "Božur" worth around two thousand euros.

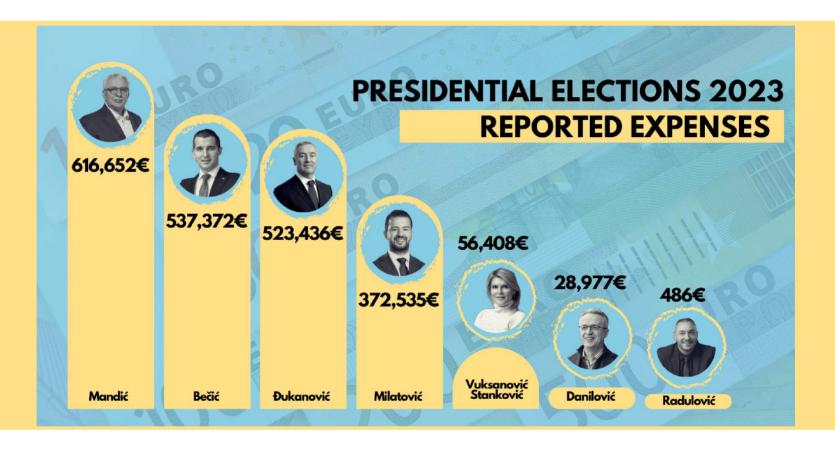
**Aleksa Bečić** collected only 1,200 euros. Five officials of that party funded his campaign with amounts of several hundred euros each – namely, Dejan Kandić with 100, Miroslav Doderović and Nikola Radojević with 250 euros each, and Ilija Pješčić and Dragan Tufegdžić with 300 euros each.

<sup>[13]</sup> See at: https://www.vijesti.me/vijesti/politika/582671/ujedinjena-crna-gora-izabrala-novi-opstinski-odbor-u-baru .

# 2. EXPENSES

Total reported campaign expenses of all presidential candidates were around 2.1 million euros.

The largest expenses were reported by Mandić, over 600 thousand euros, while Bečić and Đukanović reported over half a million. Milatović reported expenses of around 370 thousand euros, Vuksanović Stanković slightly less than 60 thousand, Danilović nearly 30 thousand euros, and Radulović slightly less than 500 euros.

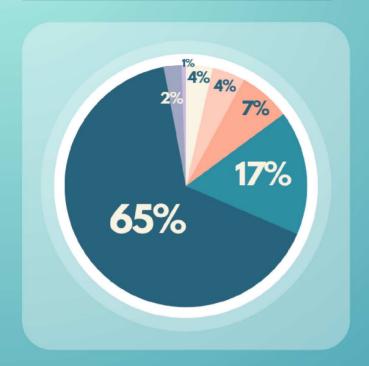


# 2.1. Structure of expenses

Two-thirds of the total reported expense of all candidates relate to advertising, around 17% relate to the expenses of making videos and promotional materials, around 7% reported expenses are for the organization of rallies, only 4% are payments to activists, and public opinion polls make up around 1% of total campaign expenses.

# **PRESIDENTIAL ELECTIONS 2023**

# **STRUCTURE OF EXPENSES**



ADVERTISING

1.400,012 euros

PRODUCTION OF MATERIALS AND VIDEOS 354,758 euros

RALLIES AND PROMOTIONS
148.128 euros

ACTIVISTS

93,711 euros

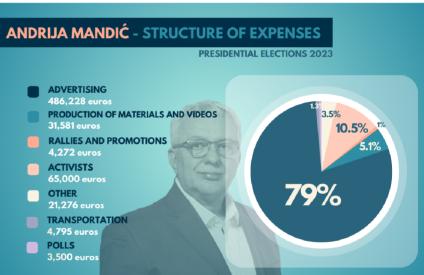
OTHER 76,116 euros

TRANSPORTATION

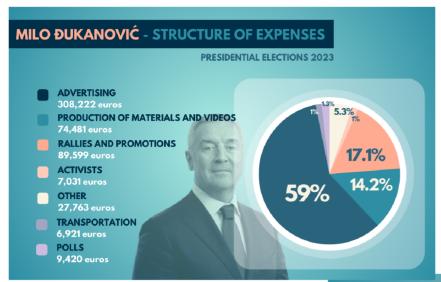
50,220 euros

POLLS 12,920 euros

Nearly 80% of the official expenses of the candidate Mandić refer to advertising, and around 75% of the reported expenses of the candidate Danilović. The share of advertising expenses in the total reported expenses of Milatović is around 65%, and nearly 60% for Đukanović and Bečić each, i.e. around 50% in the case of the candidate Vuksanović Stanković. Candidate Radulović did not report advertising expenses.





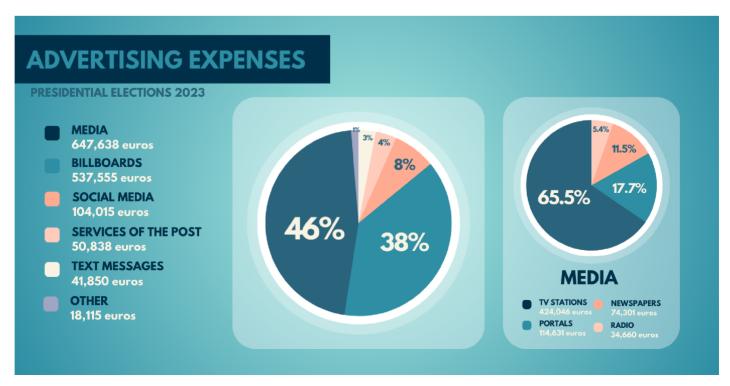


Candidates Đukanović and Vuksanović Stanković have a larger share of rally expenses in total expenses than other candidates, while Mandić's expenses are disproportionately small, such is the case with his expenses for creating promotional materials and videos.



# 2.1.1. Advertising expenses

Nearly half of the advertising expenses relate to advertising in the media, slightly more than a third of the reported expenses are billboards, and only around 8% are social media advertisements.

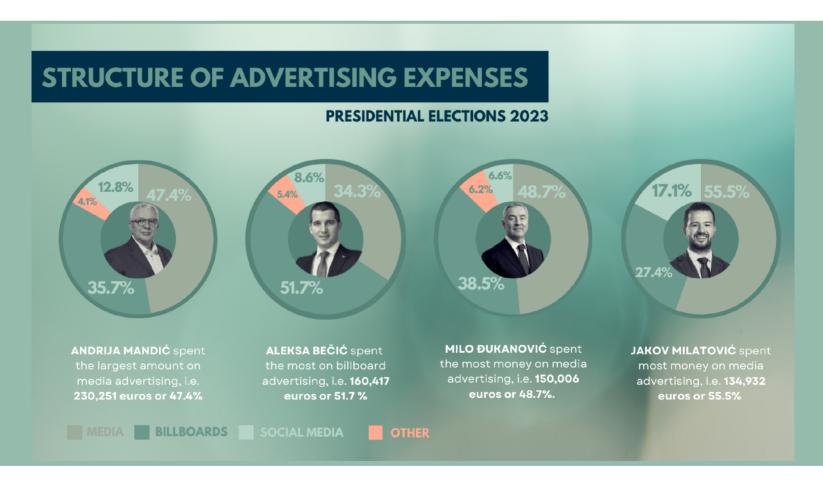


Candidate Andrija Mandić had the highest reported advertising expenses, over 486 thousand euros, of which around 230 thousand euros refer to media advertisements, over 170 thousand euros to billboards, and slightly less than 20 thousand to social media advertising. More than 60 thousand refers to other forms of advertising, mainly the expenses of distribution of promotional material through the state-owned company Montenegro Post.

Bečić also spent over 310,000 euros on advertising, of which 160,000 on billboards, and around 106,000 on TV ads. He spent slightly less than 17 thousand euros for social media advertising, and nearly 27 thousand was spent on other forms of advertising, mainly text messages.

Đukanović reported nearly 310 thousand euros in advertising expenses, of which around 150 thousand refer to advertising in the media, nearly 120 thousand to billboards, slightly less than 20 thousand to social media ads, and around 20 thousand to other forms of advertising, namely text messages.

Milatović reported over 240,000 euros in advertising expenses, of which 135,000 refers to advertising in the media, over 65,000 to billboards, and over 40,000 euros to social media advertising.

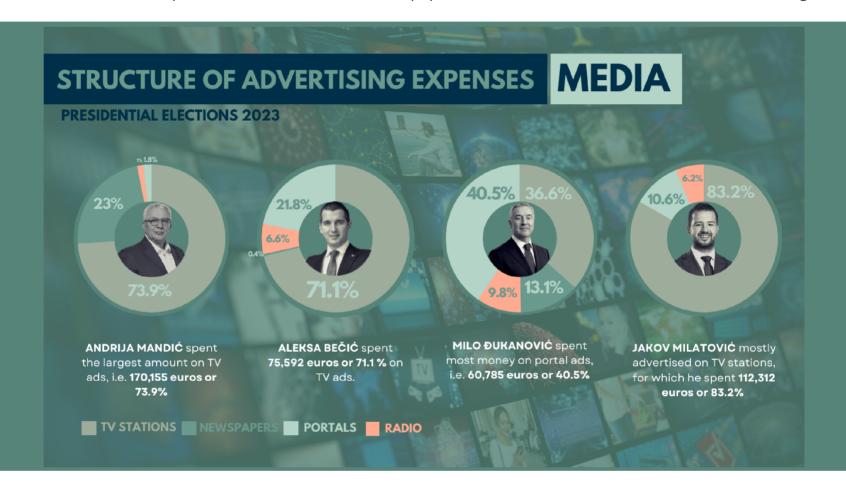


Vuksanović Stanković reported over 30,000 in advertising expenses, of which 13,000 relate to the media, nearly 11,000 to billboards, and over 6,000 to social media.

Danilović reported that he had spent around 21,000 euros for advertisements, of which nearly 13,000 was spent on media ads, 7.5 thousand for billboards, and additional 1,000 euros on other forms of advertising that were not specified in the report.

### 2.1.1.1. Media

The largest part of advertising expenses in the media refers to TV stations, around 425 thousand euros, significantly less was spent on advertisements on portals - around 115 thousand, around 75 thousand was spent on advertisements in newspapers, and around 35 thousand on radio advertising.



Mandić reported over 230,000 euros in advertising expenses in the media, and nearly 75% relate to TV stations. Đukanović reported expenses of around 150 thousand, mostly for portals, over 60 thousand, and around 55 thousand for TV stations.

In Milatović's report, expenses of around 135,000 are stated, mainly related to TV advertisements. Bečić reported over 100,000 euros, mainly for TV advertising, a quarter of the expenses related to portals, while advertisements on the radio and especially in newspapers were modest.

Vuksanović Stanković and Danilović reported around 13,000 each, which they divided between TV and portal advertisements, while Radulović did not report this type of expenses.

The table below shows on which TV stations the candidates had paid advertisements, according to the data of the Agency for Electronic Media (AEM). [14]

<sup>[14]</sup> https://aemcg.org/wp-content/uploads/2023/04/Konacni-izvjestaj-o-medijskom-predstavljanju-tokom-kampanje-za-predsjednicke-izbore.pdf.

| TV station / candidate  | Mandić | Milatović | Bečić | Đukanović | Danilović | Vuksanović<br>Stanković |
|-------------------------|--------|-----------|-------|-----------|-----------|-------------------------|
| TV Vijesti              |        |           |       |           |           |                         |
| Pink Media M            |        |           |       |           |           |                         |
| AST LLC (Prva TV)       |        |           |       |           |           |                         |
| NOVA M                  |        |           |       |           |           |                         |
| Lipa media (TV E)       |        |           |       |           |           |                         |
| A Plus Media Group      |        |           |       |           |           |                         |
| BOIN TUZI               |        |           |       |           |           |                         |
| RT MIR & TEUTA          |        |           |       |           |           |                         |
| RTV Herceg Novi         |        |           |       |           |           |                         |
| RTV Pljevlja            |        |           |       |           |           |                         |
| RTV Budva               |        |           |       |           |           |                         |
| LJE RTR LLC (TV Rožaje) |        |           |       |           |           |                         |
| RTV Cetinje             |        |           |       |           |           |                         |
| TV Adria                |        |           |       |           |           |                         |

# Case Study: Hidden advertising on TV ADRIA and TV Pljevlja

Candidate Andrija Mandić did not report advertising expenses on TV Adria at all. This is shown by the data of MANS' monitoring and confirmed by the data of the Agency for Electronic Media, which states that Mandić had over 4.5 thousand seconds of paid marketing on TV Adria.

In addition, through monitoring, we found that the candidate Aleksa Bečić did not report the expenses of advertising on TV Pljevlja. AEM's data also confirm that the expenses indisputably existed, which state that Bečić had over two thousand seconds of paid marketing on the mentioned TV.

In this regard, MANS submitted reports to the Agency for Prevention of Corruption against both candidates, but by the time this report was concluded, that institution had not made a decision.

|                               | Besplatno | Plaćeno | UKUPNO |
|-------------------------------|-----------|---------|--------|
| TV Budva                      |           |         |        |
| Andrija Mandić                | 8.974     |         | 8.974  |
| Milo Đukanović                | 4.071     |         | 4.071  |
| Jakov Milatović               | 5.925     |         | 5.925  |
| Aleksa Bečić                  | 8.264     | 1.901   | 10.165 |
| Draginja Vuksanović Stanković | 1.620     |         | 1.620  |
| Goran Danilović               | 5.409     |         | 5.409  |
| TV Budva Total                | 34.263    | 1.901   | 36.164 |
| TV Nikšić                     |           |         |        |
| Andrija Mandić                | 5.048     |         | 5.048  |
| Milo Đukanović                | 4.592     |         | 4.592  |
| Jakov Milatović               | 3.491     |         | 3.491  |
| Aleksa Bečić                  | 8.900     |         | 8.900  |
| Draginja Vuksanović Stanković | 5.534     |         | 5.534  |
| Goran Danilović               | 4.245     |         | 4.245  |
| Jovan Radulović               | 1.083     |         | 1.083  |
| TV Nikšić Total               | 32.893    |         | 32.893 |
| TV Adria                      |           |         |        |
| Andrija Mandić                | 19.196    | 4.581   | 23.777 |
| Milo Đukanović                | 7.924     |         | 7.924  |
| Jakov Milatović               | 9.463     |         | 9.463  |
| Aleksa Bečić                  | 11.549    |         | 11.549 |
| Draginja Vuksanović Stanković | 356       |         | 356    |
| Goran Danilović               | 15.531    |         | 15.531 |
| Jovan Radulović               | 139       |         | 139    |
| TV Adria Total                | 64.158    | 4.581   | 68.739 |
| TV Pljevlja                   |           |         |        |
| Andrija Mandić                | 2.281     | 5.215   | 7.496  |
| Milo Đukanović                | 8.622     |         | 8.622  |
| Jakov Milatović               | 8.505     |         | 8.505  |
| Aleksa Bečić                  | 5.757     | 2.134   | 7.891  |
| Draginja Vuksanović Stanković | 776       |         | 776    |
| Goran Danilović               | 5.551     |         | 5.551  |
| Jovan Radulović               | 671       |         | 671    |
| TV Pljevlja Total             | 32.163    | 7.349   | 39.512 |
| TV 7                          |           |         |        |
| Andrija Mandić                | 310       |         | 310    |
| Milo Đukanović                | 4.757     |         | 4.757  |
| Jakov Milatović               | 775       |         | 775    |
| Aleksa Bečić                  | 349       |         | 349    |
| Draginja Vuksanović Stanković | 947       |         | 947    |
| Goran Danilović               | 65        |         | 65     |
| Jovan Radulović               | 86        |         | 86     |
| TV 7 Total                    | 7.289     |         | 7.289  |

24

Bulevar Svetog Petra Cetinjskog 9 Podgorica, Crna Gora Telefon:+382 20 201 430 Telefax: +382 20 201 440

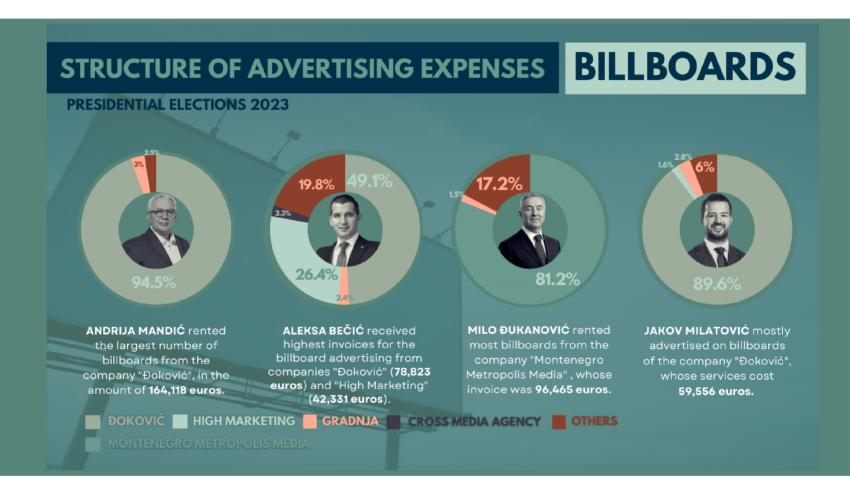


E-mail:<u>aem@aemcg.org</u> www.aemcg.org

### 2.1.1.2. Billboards

Nearly 540,000 euros was spent on billboard advertisements, and over 60% of all reported expenses refer to the company "Đoković", whose services, worth nearly 300,000 euros, were used by four candidates.

Mandić reported the highest advertising expenses on billboards, nearly 175 thousand euros, in second place was Bečić with 160 thousand spent, in third place was Đukanović with nearly 120 thousand euros, and then Milatović with slightly less than 70 thousand euros spent on billboards.



Vuksanović Stanković stated expenses of around 10 thousand, and she also rented billboards only from Đoković. Danilović reported 7.5 thousand euros of expenses and rented everything from Cross media agency.

# 2.1.1.3. Social media advertising

According to the available data from the report, the candidates reported expenses of social media advertising in the total amount of around 100 thousand euros.

The largest part of the reported expenses of social media advertising refers to agencies that provide advertising services - 45%, 40% are ads on Google that are paid directly, and 15% relates to Facebook.

Milatović reported over 40,000, twice as much as Đukanović and Mandić, who stated that they had spent slightly less than 20,000 euros each for advertisements on social media. Bečić reported expenses of slightly less than 17,000, and Vuksanović Stanković over 6,000. Danilović and Radulović did not report that they had paid for social media advertising.

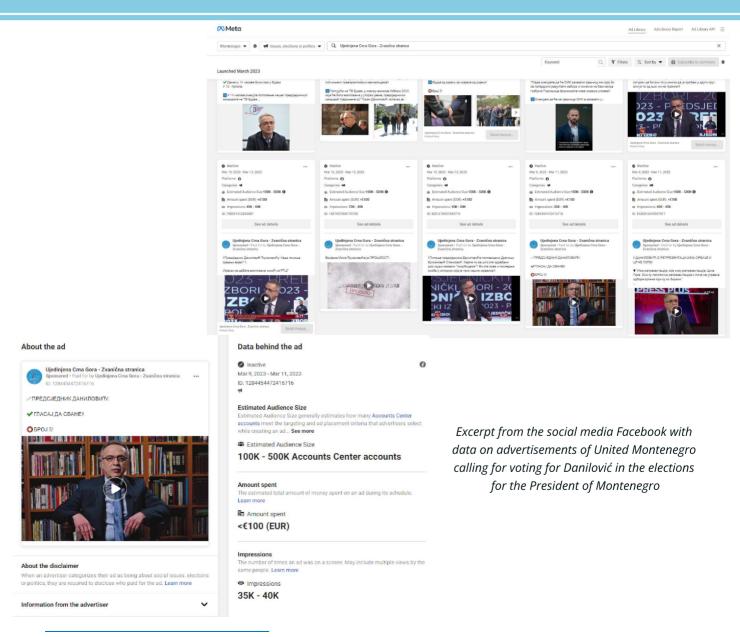
Data on advertising through Google are not publicly available, only information on advertising on Facebook, thus, it is not possible to determine whether real expenses were reported, as most candidates reported these expenses in the total amount.



# Case Study: Hidden expenses of Facebook advertising

Aleksa Bečić reported around 9 thousand euros of advertising expenses on Facebook, and according to the data of that social media, in the period from February 20 to March 21, over 11 thousand euros was spent on advertising the page Aleksa Becic - Demokrate - Demokratska Crna Gora.

Goran Danilović did not report the expenses of advertising on the social media Facebook at all. Data from that social media [15] show that in the period from February 19 to March 20, United Montenegro, Goran Danilović's party, spent nearly 2,000 euros on paid ads that promoted him as a candidate in the presidential elections.



<sup>[15]</sup> https://www.facebook.com/ads/library/?

active\_status=all&ad\_type=political\_and\_issue\_ads&country=ME&view\_all\_page\_id=1437529949875716&sort\_data[direction]=desc&sort\_data[mode]=relevancy\_monthly\_grouped&search\_type=page&media\_type=all.

### 2.1.1.4. Largest suppliers by candidates

The largest advertising supplier is "**Đoković"** LLC, which provided billboard advertising services to four candidates, worth a total of over 313 thousand euros. That company provided the most services to Andrija Mandić, worth nearly 165 thousand euros, followed by Bečić for nearly 80 thousand, Milatović for nearly 60 thousand and Vuksanović Stanković for slightly less than 11 thousand euros.

This company is owned by Velimir Đoković, the chairman of the Municipal Assembly of Danilovgrad, who is a member of the Main and Executive Board of the New Serb Democracy (Nova) and the chairman of the municipal board of that party in Danilovgrad. [16] That company started developing the business with billboards in 2016 when, thanks to the business with Nova during the parliamentary elections, there was a sharp increase in revenue from sales, but significant unpaid claims remained. [17] Later, the business of that company directly depended on the timing of the elections, in years when it did not rent billboards to the political party of its owner, the revenues were significantly lower than in election years. During the presidential elections, this company rented hundreds of billboards, and on its website there are only five locations that are advertised within the offer. [18]

In second place is Vijesti, which provided services worth over 280,000 euros. Vijesti includes a TV station, a newspaper and a portal, which are usually divided into two companies, but political entities report these expenses cumulatively. Vijesti provided the most services to Milatović, over 110,000 euros, around 105,000 to Mandić, slightly less than 47,000 to Bečić, nearly 12 to Danilović, and around 6,500 to Vuksanović Stanković.

In third place is **Montenegro Metropolis Media**, which rented billboards to Đukanović for 96,000 euros and did not do business with other presidential candidates. That company is owned by the Kovač family, which co-owns the small hydropower plant Vrbnica. Until 2020, the ownership of the company was hidden behind two Cypriot companies owned by Kovač.

In fourth place is **Pink Media M**, which sells ads for Pink M TV based in Serbia, with around 90 thousand. Of that, about 60,000 pertains to the advertising of Mandić, and over 30,000 to Bečić.

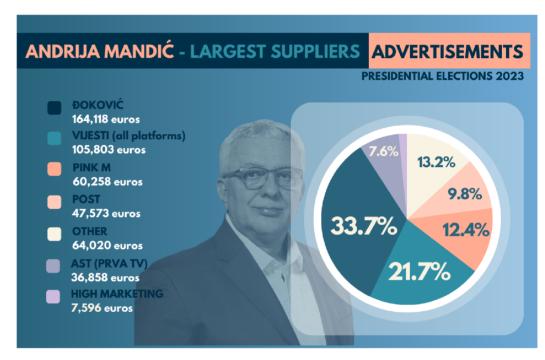
In fifth place is **High Marketing** with over 50,000, which rented billboards to Bečić for around 42,000 euros, and provided the remaining services to Mandić, which are not described more precisely. It is an advertising agency from Budva that previously gave donation to the coalition led by Bečić's party. [19]

<sup>[16]</sup> https://www.danilovgrad.me/me/clanovi/velimir-dokovic .
[17] MANS: Implementation of the Law on Financing Political Entities and Election Campaigns (2016 – 2018), Case Study 8: The lease of billboards through an affiliated company, https://www.mans.co.me/en/wp-content/uploads/2019/047FPPen.pdf .
[18] https://www.djokovicdoo.com/bilbordi/ [19] in the campaign for the 2020 parliamentary elections, a non-financial contribution (for services) from the company High Marketing, was registered for the "Peace is Our Nation" coalition, worth 2,541 euros. The company is registered in Podgorica, and the owner is Jovan Culafic, according to data from the Central Registry of Commercial Entities.

State-owned company, Montenegro Post, is in sixth place with around 50,000, which mainly relate to the distribution of materials for Mandić - over 47,000 euros, and the rest refers to Bečić.

In addition, the company Infiniti Marketing, which Đukanović hired to mediate in the purchase of social media advertisements, worth around 19 thousand euros, is owned by Andrija Ćetković, a former member of the DPS Youth Council.

An overview of the candidates shows that the largest suppliers of Mandić were the company Đoković, Vijesti, Pink Media M, Montenegro Post and Prva TV.



Bečić's largest suppliers were also Đoković and Vijesti, followed by High Marketing, Pink Media M, and Nth, a company from Belgrade that provides bulk text messaging services. [20]







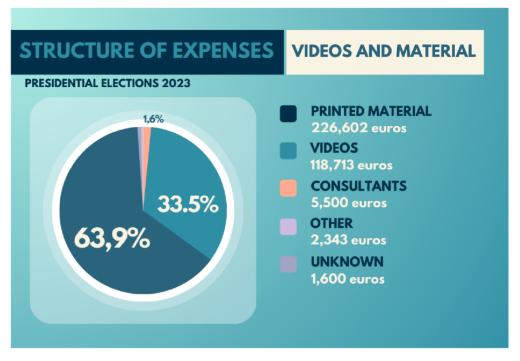
Milatović's largest suppliers were also Vijesti and Đoković, followed by Google, to whom he directly paid for services, and CDM, the company that owns the portal of the same name.

In case of Vuksanović Stanković, the largest suppliers were Vijesti and Đoković, followed by CDM and Nova Pobjeda. Danilović's largest supplier was also Vijesti.

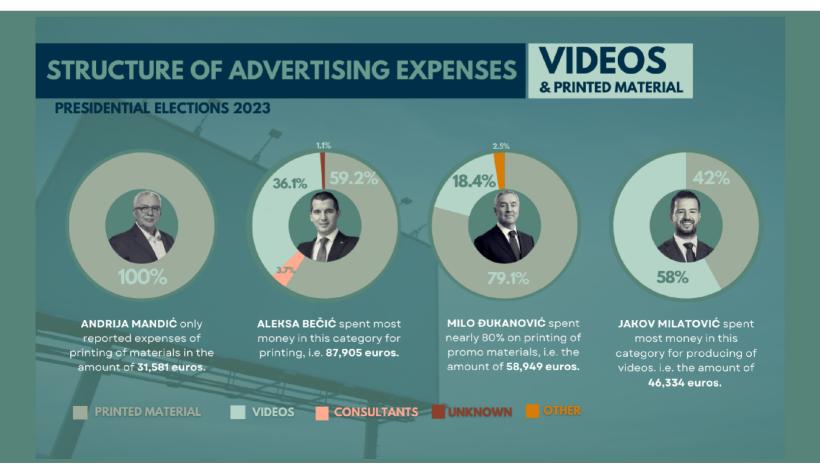
Only Đukanović did not advertise either in Vijesti or through Đoković. Its largest suppliers are Montenegro Metropolis Media, CDM, Lipa media, i.e. the company that owns TV E, Nova Pobjeda and Nova M TV.

# 2.1.2. Expenses of creating promotional materials and videos

Total reported expenses for the production of promotional materials and videos are around 355 thousand euros, of which nearly two thirds i.e. around 226 thousand euros refer to the production of printed promotional materials, and slightly less than 120 thousand to the production of promotional videos. Consulting expenses of only 5.5 thousand were reported for by one candidate alone, Aleksa Bečić.



Aleksa Bečić reported the highest expenses for the production of promotional materials and videos, nearly 150 thousand euros, Milatović reported around 80 thousand, Đukanović around 75 thousand, Mandić around 30 thousand, Vuksanović Stanković around 15, Danilović around 5 thousand, and Radulović slightly less than 500 euros.



Only candidate Milatović had somewhat higher expenses for the production of videos than for the production of printed materials.

The expenses of making video are disproportionately low for candidate Đukanović, while Mandić did not report them at all, even though they undoubtedly existed.

# Case Study: Hidden expenses of videos production

Candidate Mandić had at least 15 different videos, some of which were made with professional equipment, shot in multiple locations, and included extras as well.

In addition, one of the candidate's videos promotes the projects of the state-owned Montenegrin Electric Enterprise, whose board of directors includes members of Mandić's party.

MANS submitted report to APC due to concealing the expenses of videos production, but that institution had not made a decision until the conclusion of this report.

In addition, we filed a report against Montenegrin Electric Enterprise as well, but according to the Agency for Prevention of Corruption, the state-owned companies are not prohibited from advertising that favours political entities during the election campaign.



Pedgerica, 30. 03.

# Crna Gora Agencija za sprječavanje korupcije

Broj:UPI-02-03-90/2-2023

Agencija za sprječavanje korupcije na osnovu člana 56 stav 3 Zakona o finansiranju političkih subjekata i izbornih kampanja ("Sl.list CG", br.3/2020 i 38/2020) odlučujući po prijavi broj UPI 02-03-90/2023 od 13.03.2023.godine, podnijetoj protiv Elektroprivrede Crne Gore AD Nikšić zbog kršenja člana 38 stav 5 Zakona o finansiranju političkih subjekata i izbornih kampanja, dana 27.03.2023.godine donijela je

### ODLUKU

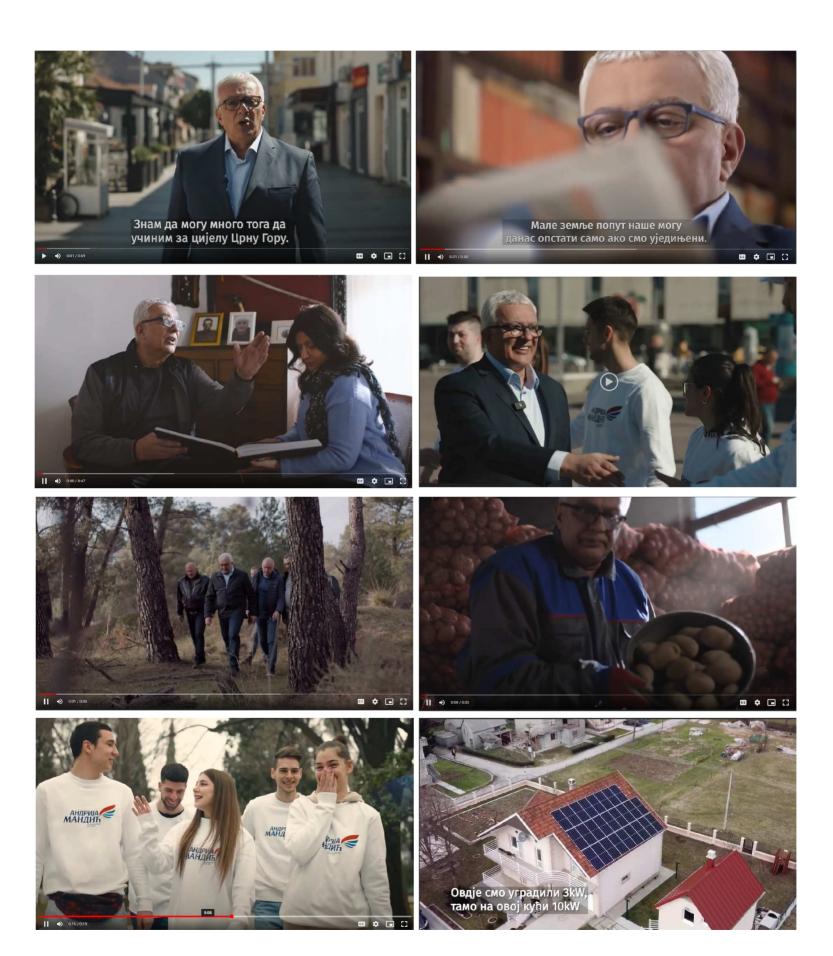
Ne pokreće se postupak protiv Elektroprivrede Crne Gore AD Nikšić, radi utvrđivanja povrede člana 37 Zakona o finansiranju političkih subjekata i izbornih kampanja jer Elektroprivreda Crne Gore AD Nikšić nije državni organ, organ lokalne samouprave, javna ustanova ili državni fond

### Obrazloženje

Agenciji za sprječavanje korupcije je podnesena prijava, zavedena pod brojem UPI 02-03-90/2023 od 13.03.2023.godine, kojom je zatraženo da se pokrene postupak u skladu sa ovlašćenjima propisanim zakonom i da se utvrdi kršenje člana 37 Zakona o finansiranju političkih subjekata i izbornih kampanja. U prijavi se navodi da je tokom monitoringa izborne kampanje za šredsjedničke izborezabilježeno da Elektroprivreda Crne Gore AD, kroz prezentovanje aktivnosti realizovanih u okviru projekta »Solari 3000+« vrši reklamiranje jednog od predsjedničkih izbora, što nesumnjivo ukazuje na kršenje člana 37 Zakona o finansiranju političkih subjekata i izbornih kampanja.

Članom 37 Zakona o finansiranju političkih subjekata i izbornih kampanja propisano je da je zabranjeno plaćeno reklamiranje u Crnoj Gori državnih organa i organa lokalne samouprave, javnih ustanova i državnih fondova koje na bilo koji način može favorizovati političke subjekte ili njihove predstavnike u toku izborne kampanje.

Član 37 Zakona o finansiranju političkih subjekata i izbornih kampanja se ne može primjeniti na Elektroprivredu Crne Gore AD Nikšić jer nije državni organ, organ lokalne samouprave, javna ustanova, ni državni fond, već privredno društvo u većinskom vlasništvu države.



Excerpts from the videos of candidate Mandić broadcast on TV stations and social media

# Case Study: Hidden expenses of advertising material

Mandić had a specific promotional material, at least two balloons, the expenses of which he did not report in the report on campaign financing.

In the part of the report that refers to advertising material, balloons are not mentioned, and specific materials produced (e.g. flags, T-shirts, pens, lighters...) are listed in detail.

One of the balloons had Mandić's promotional message printed on it, and the other, used at the beginning of the campaign, had the European Union logo on it.

Until the conclusion of this report, we had not been able to locate a single company in Montenegro that rents such balloons, and upon our inquiry, the Civil Aviation Agency informed us that there are no certified aircrafts in its registry and, thus, there is no possibility of renting balloons.

Troškovi za izradu reklamnih spotova i reklamni materijal

| Ime i prezime /<br>naziv pružaoca<br>usluge              | Vrsta materijala                                     | Broj proizvoda,<br>spotova,<br>reklama | Datum      | Cijena po<br>jedinici (u<br>€) | Plaćeno / nije<br>plaćeno /<br>djelimično<br>plaćeno | Djelimično<br>plaćeno iznos<br>(u €) | Ukupni<br>troškovi (u<br>€) | Napomena |
|--|--|--|------------|--------------------------------|--|--------------------------------------|-----------------------------|----------|
| Firmoprom d.o.o.   | ZASTAVE  | 195                                    | 06.03.2023 | 15,13                          | Plaćeno  | 0,00                                 | 2.949,38                    |          |
| doo Ras Press  | NOTESI, ROLL UP,<br>OLOVKE, UPALJAČI                 | 1                                      | 04.03.2023 | 3.327,50                       | Plaćeno  | 0,00                                 | 3.327,50                    |          |
| doo Ras Press  | OLOVKE, UPALJAČI,<br>FASCIKLE,<br>DUKSEVI            | 1                                      | 04.03.2023 | 3.096,63                       | Plaćeno  | 0,00                                 | 3.096,63                    |          |
| doo Ras Press  | JAKNE, KAČKETI                                       | 1                                      | 04.03.2023 | 4.249,52                       | Plaćeno  | 0,00                                 | 4.249,52                    |          |
| doo Ras Press  | UPALJAČI, OLOVKE                                     | 1                                      | 04.03.2023 | 3.974,85                       | Nije plaćeno   | 0,00                                 | 3.974,85                    |          |
| doo Ras Press  | PROMO PULTOVI  | 25                                     | 04.03.2023 | 114,95                         | Nije plaćeno   | 0,00                                 | 2.873,75                    |          |
| doo Ras Press  | DUKSEVI, FLAJERI,<br>FASCIKLE, TORBE                 | 1                                      | 04.03.2023 | 7.805,83                       | Nije plaćeno   | 0,00                                 | 7.805,83                    |          |
| doo Ras Press  | DUKSEVI, OLOVKE,<br>UPALJAČI,<br>REKLAMNI<br>BLOKOVI | 1                                      | 06.03.2023 | 3.303,30                       | Nije plaćeno   | 0,00                                 | 3.303,30                    |          |
| Jkupni troškovi za reklamne spotove i reklamni materijal |  |  |            |                                |  | 31.580,76                            |                             |          |

Excerpt from the report on the financing of the campaign of candidate Andrija Mandić, which refers to the production of ads and advertising material







# 2.1.2.1. Largest suppliers by candidates

Largest supplier for promotional materials and videos is the company **Atomic LLC**, which made videos for Milatović worth slightly less than 37 thousand euros. That company also produces videos and there is no information about its founder's connection with any political party.

In second place is **M Promo**, the company that produced printed materials for Bečić, worth over 35 thousand euros. The owner of that company is Maja Pejović from Danilovgrad, and there is no information about her connections with political parties.

In third place is **MAPA**, which produced videos and printed materials for Đukanović, the reported value of which is 30 thousand euros. The owners of that company are Radmila Vojvodić (60%), the former Rector of the University of Montenegro, who has multiple connections with Đukanlović and his party, and Vuk Eraković (40%).

The company Ras Press produced printed materials for Mandić worth slightly less than 30 thousand euros. That company is owned by Slavica and Milisav Vujković from Nikšić, for whom there is no information on ties to political parties.

Rooster production produced printed materials for Bečić worth nearly 28 thousand euros. It is a company from Belgrade that produces videos. Print house produced printed materials for Milatović worth around 18 thousand euros, whose owners are also not connected to parties.









DPC LLC and Dale Company produced printed materials for Đukanović in the amount of around 18,000 euros each. The owner of the DPC company, Mirko Đurić, also has 50% in the Sato company, which in 2013 privatized the hotel "Nikšić" in Sutomore as part of the Hotel and Tourism Enterprise "Onogošt" in Nikšić.

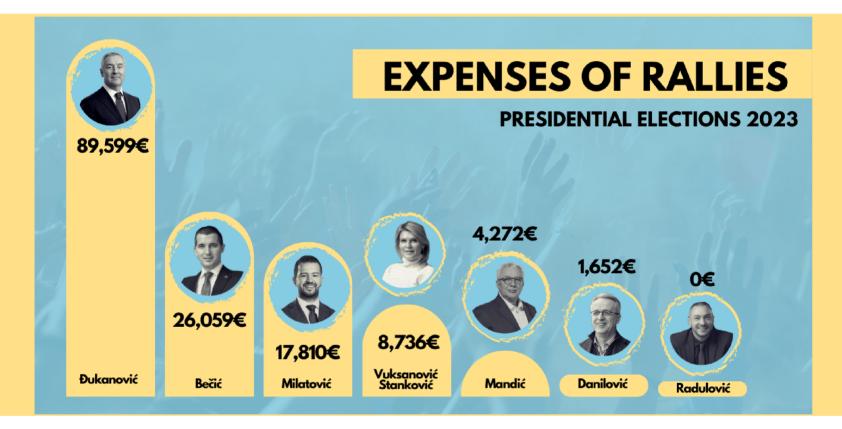
Until 2017, Dale Company was registered to Aleksandar Damjanović (Culture Net of Montenegro), and after that it was transferred to Mileva Damjanović.

The largest suppliers of Bečić for promotional materials and video production are M Promo, Rooster production, Pogon and Mouse studio. Atomic and Print house are Milatović's largest suppliers, while MAPA, DPC and Dale Company are Đukanović's. Ras Press is the largest supplier of Mandić.

### 2.1.3. Expenses of rallies organisation

Around 60% of all the reported expenses of the rallies i.e. nearly 90 thousand euros refer to the candidate Đukanović, which are mainly related to the services of the company BBA-Agregati. The owner of that company is Igor Dragutinović, and the company is the owner of the office space that it rents to TV E (Lipa Media). This TV station is associated with the company Bemax, and one of the members of the board of directors is Nikola Martinović, Ana Đukanović's business partner in the business related to the privatization of Telekom.

Đukanović reported nearly 90,000 euros in rallies expenses, and Mandć only around 4,000, twice less than candidate Vuksanović Stanković, who reported nearly 9,000. The expenses of the rallies organized by Milatović amounted to slightly less than 18,000 euros, while Bečić reported 26,000 euros.

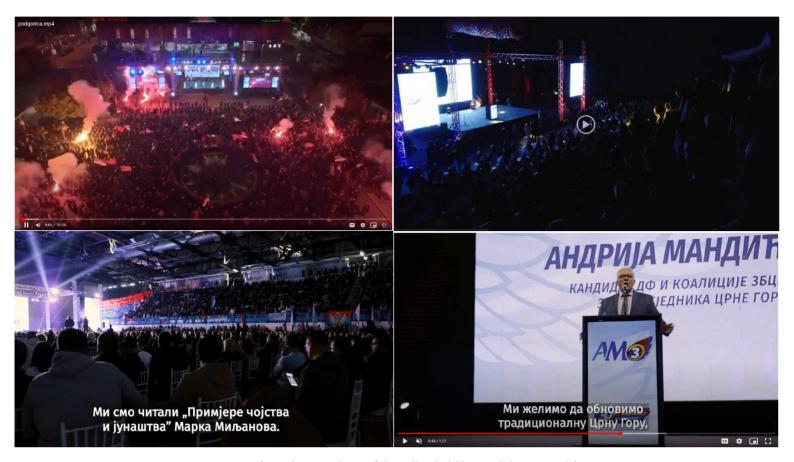


Mandić's expenses for the rallies refer only to the rental of space in seven towns [21], **and he did not report a single cent of equipment expenses**.

# Case Study: Hidden expenses of rallies equipment

The recordings of Mandić's rallies in Podgorica, Budva and Nikšić show that he had three projection screens, a stage and a sound system, while at almost all other rallies he had one video beam. There are no reported equipment expenses at all in his official reports.

<sup>[21]</sup> Rental expenses were reported to the following suppliers: Public Institution Centre for Culture Andrijevica, Public Institution Centre for Culture Plav, Public Institution Centre for Culture Berane, Public Institution Centre for Culture "Nikola Đurković" (Kotor), Public Culture Institution "Herceg Fest", Municipality of Tivat, Sports Centre Nikšić.



Excerpts from the recordings of the rallies held by candidates Mandić

# 2.1.4. Transportation expenses

More than 60% of the total transportation expenses were reported by Aleksa Bečić i.e. around 30 thousand euros, while Đukanović and Milatović reported slightly less than seven thousand i.e. nearly five times less amounts. Mandić reported slightly less than five thousand euros, i.e. six times less than Bečić, and Vuksanović Stanković 1.4 thousand.



### 2.1.5. Expenses of activists

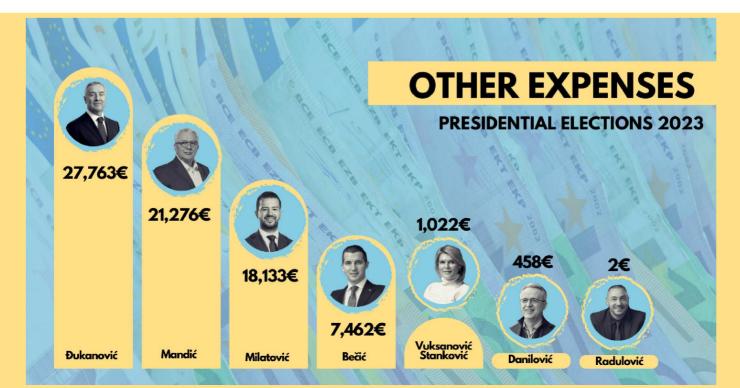
The largest part of the expenses of the activists was reported by Mandić, 65 thousand euros, while Đukanović and Milatović reported only 7 thousand each. Bečić reported around 14.5 thousand, and Danilović only 150 euros.



# 2.1.6. Other expenses

Over 80% of other expenses refer to food and beverages, and it is interesting that not a single candidate reported a single cent of phone expenses.

Đukanović reported nearly 28,000, Mandić around 21, Milatović around 18,000, and Bečić slightly more than seven thousand.



# **Case study: Copying of voter lists**

It is interesting that in their official reports, the candidates Jakov Milatović and Milo Đukanović reported that they had copied voter lists, i.e., election materials.

Voter lists contain personal data and their possession by unauthorized persons is punishable by the Law on Personal Data Protection. That law foresees fines for legal entities up to 20,000 thousand euros if they process personal data contrary to that regulation.

It is interesting that precisely because of this law, NGOs have limited access to the voter list, which to a large extent made it difficult and even impossible to conduct monitoring in that area.

| Usluga kopiranja biračkih<br>spiskova | Alfa inžinjering | 28.03.2023 | Plaćeno | 0,00 | 151,25   |  |
|---------------------------------------|------------------|------------|---------|------|----------|--|
| Sendvič                               | Minico doo       | 18.04.2023 | Plaćeno | 0,00 | 1.750,00 |  |
| Baloni                                | SPAJZ DOO        | 07.03.2023 | Plaćeno | 0,00 | 50,00    |  |
| Usluga kopiranja biračkih<br>spiskova | Alfa inžinjering | 10.04.2023 | Plaćeno | 0,00 | 151,25   |  |

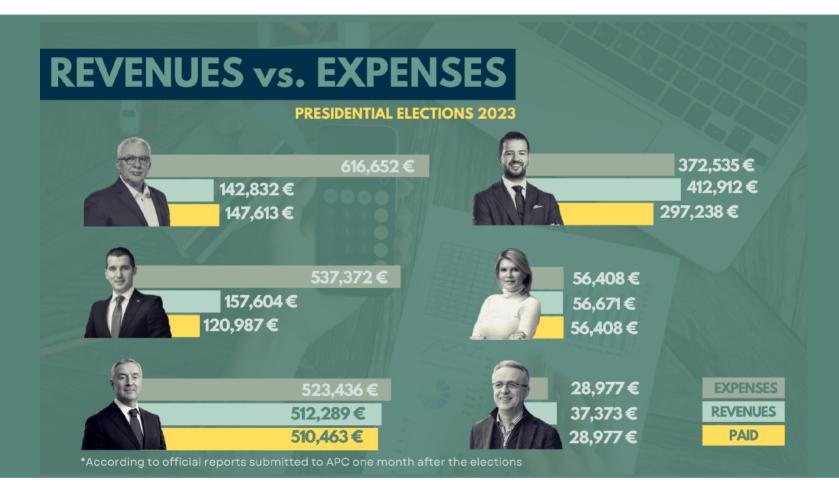
### Excerpt from the report of Jakov Milatović

| fotokopiranje izbornog materijala                 | Izborna komisija<br>Cetinje          | 23.03.2023 | Plaćeno | 0,00 | 300,00 |  |
|---|--------------------------------------|------------|---------|------|--------|--|
| Kopiranje knjiga Biračkih spiskova opštine H.Novi | Madžarević Biro<br>Konto i ortaci OD | 24.03.2023 | Plaćeno | 0,00 | 338,80 |  |

Excerpt from the report of Milo Đukanović

# 3. DEBTS

According to official reports, one month after the elections, the candidates did not pay around one million euros in campaign expenses they had reported. Mandić, with around 470,000 euros, and Bečić with almost 420,000, have the highest debts. Milatović was left to pay around 75 thousand euros, and Đukanović around 13 thousand euros for officially reported campaign expenses. Vuksanović Stanković, Danilović and Radulović settled all reported expenses before submitting the report.



For the purpose of raising funds to finance the election campaign expenses, the political entity shall open a separate bank account. [22] The law stipulates that all payments of election campaign expenses shall be carried out by the political entity via that account, until the separate account is closed. [23] Political entity shall close the separate bank account within 90 days from the day final election results are announced. [24] Prior to that, 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. [25] However, neither the Agency for Prevention of Corruption nor the State Audit Institution find themselves competent to determine whether the parties have paid their debts to suppliers.

<sup>[22]</sup> Article 24 paragraph 1 of the Law on Financing of Political Entities and Election Campaigns.

<sup>[23]</sup> Article 24 paragraph 3 of the Law on Financing of Political Entities and Election Campaigns.

<sup>[24]</sup> Article 25 paragraph 1 of the Law on Financing of Political Entities and Election Campaigns.

<sup>[25]</sup> Article 17 paragraph 6 of the Law on Financing of Political Entities and Election Campaigns.

Previous practice has shown that political parties do not pay all election campaign expenses from the election account, but from the regular financing account. MANS' investigation indicated that some political entities never paid significant expenses of the election campaign. [26] This essentially means that they received hidden donations for the campaign from those suppliers, and in specific cases, significantly higher than the prescribed legal limit. This is why such a high amount of debt after this election campaign is extremely worrying.

Candidate Radulović reported less than 500 euros in expenses, and he received more than 25,000 from the state to finance the campaign. **The law does not provide that excess funds collected in the campaign be returned to the state.** 

# 3.1. Debts to suppliers

Andrija Mandić did not pay a single cent of the costs the billboard advertising by the company "Đoković", whose owner is a member of the leadership of his party. [27] He did not pay over 60,000 euros for advertising on TV Pink M, as well as over 55,000 euros for marketing on Vijesti TV and over 35,000 euros for advertising on the portal and in the printed edition of Vijesti. Mandić did not pay the debt to TV Prva of nearly 37 thousand, as well as 15 thousand to TV A Plus.

Mandić also did not pay the debt to Montenegro Post of over 47 thousand euros, as well as nearly six thousand to the state company "Plantaže". Mandić is yet to pay a debt to companies "Ras Press" which produced his printed materials and "CPC Media" from Kragujevac, through which he advertised on social media, in the amount of over 17 thousand euros each.

| Supplier                                  | Total amount | Paid   | Remaining<br>debt |
|---|--------------|--------|-------------------|
| LLC "Đoković"                             | 164,118      | -      | 164,118           |
| Pink Media M                              | 60,258       | -      | 60,258            |
| Televizija Vijesti                        | 55,014       | -      | 55,014            |
| Montenegro Post                           | 47,573       | -      | 47,573            |
| AST LLC (PRVA TV)                         | 36,858       | -      | 36,858            |
| DAILY PRESS - Vijesti                     | 50,790       | 15,000 | 35,790            |
| LLC Ras Press                             | 28,631       | 10,674 | 17,958            |
| CPC MEDIA KRAGUJEVAC                      | 17,375       | -      | 17,375            |
| A PLUS MEDIA GROUP                        | 15,000       | -      | 15,000            |
| Takt Podgorica                            | 6,655        | -      | 6,655             |
| Plantaže JSC                              | 11,579       | 5,876  | 5,704             |
| HIGH MARKETING LLC                        | 7,596        | 3,596  | 4,000             |
| Newspaper and portal "Pljevaljske novine" | 535          | 267    | 267               |
| Municipality of Tivat                     | 242          | -      | 242               |

Table 1: Debts of candidate Andrija Mandić at the time of submitting the official report

Bečić still has debt to many suppliers, and mostly to the company "Đoković", owned by an official from Nova, of nearly 80,000 euros. In second place is the company High Marketing, an advertising agency from Budva, from which, among other things, billboards were rented, and to which a debt of over 40 thousand euros remained. That company previously appeared as a donor to a coalition

led by Bečić's party. [28]

Bečić also did not pay the debt for advertising on Pink M TV of over 30 thousand euros, as well as over 27 thousand euros to TV Vijesti, and around 19 thousand euros to the portal and newspaper of that media house. Over 23 thousand euros have not been paid to the company Nth from Belgrade. Bečić owes around 18,000 euros to the company M Promo, which made promotional materials, and over 17,000 to the company Rooster Production, which made his videos.

Bečić did not pay the debt to the company Pogon for the production of printed materials of around 16 thousand euros, the per diems to the observers of over 10 thousand, as well as debts to a large number of other suppliers, which are shown in table 2.

| Supplier                         | Total amount | Paid   | Remaining<br>debt |
|----------------------------------|--------------|--------|-------------------|
| LLC "Đoković"                    | 78,823       | -      | 78,823            |
| High Marketing LLC               | 42,331       | -      | 42,331            |
| Pink Media M                     | 31,420       | -      | 31,420            |
| Televizija Vijesti               | 27,585       | -      | 27,585            |
| Nth                              | 23,268       | -      | 23,268            |
| DAILY PRESS - Vijesti            | 19,073       | -      | 19,073            |
| M Promo                          | 35,103       | 16,952 | 18,151            |
| Rooster production               | 27,735       | 10,000 | 17,735            |
| Pogon                            | 16,006       | -      | 16,006            |
| PG Sound                         | 13,471       | 1,500  | 11,971            |
| Jugopetrol                       | 11,407       | -      | 11,407            |
| AUTHORIZED REPRESENTATIVES       | 14,530       | 3,880  | 10,650            |
| Merkator-International LLC       | 8,518        | -      | 8,518             |
| LLC Delux                        | 7,260        | -      | 7,260             |
| Trade Business Centre Ražnatović | 7,260        | -      | 7,260             |
| AST LLC (PRVA TV)                | 6,970        | -      | 6,970             |
| NOVA M                           | 6,315        | -      | 6,315             |
| Petrol CG                        | 5,774        | -      | 5,774             |
| CLICK PRINT                      | 4,765        | -      | 4,765             |
| Water group                      | 4,128        | -      | 4,128             |
| LLC Bahus                        | 3,848        | -      | 3,848             |
| Gradnja LLC                      | 3,775        | -      | 3,775             |
| Cross media agency LLC           | 3,691        | -      | 3,691             |
| CDM LLC                          | 3,632        | -      | 3,632             |
| Humci                            | 3,497        | -      | 3,497             |
| Designbox                        | 3,146        | -      | 3,146             |
| Neboeletronics LLC (Radio S1)    | 2,790        | -      | 2,790             |

<sup>[28]</sup> In the campaign for the 2020 parliamentary elections, a non-financial contribution (for services) from the company High Marketing, was registered for the "Peace is Our Nation" coalition, worth 2,541 euros. The company is registered in Podgorica, and the owner is Jovan Culafić, according to data from the Central Registry of Commercial Entities.

| Supplier   | Total amount | Paid  | Remaining debt |
|--|--------------|-------|----------------|
| Božur LLC Podgorica                                  | 2,675        | -     | 2,675          |
| Inrut  | 2,674        | -     | 2,674          |
| KOMO   | 2,614        | -     | 2,614          |
| Filan company  | 2,218        | -     | 2,218          |
| LLC MD COMPANY                                       | 1,674        | -     | 1,674          |
| LLC Nimas  | 1,670        | -     | 1,670          |
| Division Itd   | 1,634        | -     | 1,634          |
| Oki Air Broadcasting                                 | 1,402        | -     | 1,402          |
| Public radio broadcasting company RTV Herceg<br>Novi | 1,331        | -     | 1,331          |
| Čaušević company                                     | 1,280        | -     | 1,280          |
| Public Culture Institution "Herceg fest"             | 1,210        | -     | 1,210          |
| Radio television Budva                               | 1,150        | -     | 1,150          |
| Media international corporation LLC (DRS)            | 1,131        | -     | 1,131          |
| Hotel Hilton   | 3,550        | 2,500 | 1,050          |
| Vakom  | 1,000        | -     | 1,000          |
| Vatromet Vukotić LLC                                 | 773          | -     | 773            |
| Local community of Baošić                            | 726          | -     | 726            |
| BOIN TUZI  | 581          | -     | 581            |
| Kafer LLC  | 580          | -     | 580            |
| Maruška  | 564          | -     | 564            |
| Tourist Centre Durmitor                              | 500          | -     | 500            |
| NGO Information Centre Pljevlja (PV portal)          | 500          | -     | 500            |
| Springs eye LLC                                      | 500          | -     | 500            |
| Foto Bruno   | 484          | -     | 484            |
| Uglješa Vlahović                                     | 484          | -     | 484            |
| Newspaper and portal "Pljevaljske novine"            | 467          | -     | 467            |
| CITY LED LLC   | 450          | -     | 450            |
| Tourist Organisation of Pljevlja                     | 400          | -     | 400            |
| Amfritita LLC  | 364          | -     | 364            |
| LJE RTR LLC  | 240          | -     | 240            |
| Trio pro   | 150          | -     | 150            |
| LLC Čistoća  | 119          | -     | 119            |

Table 2: Debts of candidate Aleksa Bečić at the time of submitting the official report

Milatović also owes Đoković LLC nearly 60,000 euros for the billboards. He owes Vijesti around seven thousand and around five thousand to CDM for advertisements, as well as smaller amounts to several other suppliers.

| Supplier                                 | Total amount | Paid    | Remaining<br>debt |
|--|--------------|---------|-------------------|
| LLC "Đoković"                            | 59,556       | -       | 59,556            |
| DAILY PRESS – Vijesti                    | 110,898      | 103,792 | 7,106             |
| CDM LLC                                  | 10,891       | 5,445   | 5,445             |
| Gradnja LLC                              | 1,089        | -       | 1,089             |
| University Sports and Culture Centre LLC | 1,000        | -       | 1,000             |
| PI Centre for Culture Berane             | 300          | -       | 300               |
| PI Centre for Culture Pljevlja           | 300          | -       | 300               |
| Digital Media Factory (Novski portal)    | 515          | 415     | 100               |
| PI Centre for Culture Andrijevica        | 100          | -       | 100               |

Table 3: Debts of candidate Jakov Milatović at the time of submitting the official report

Đukanović did not pay all the expenses of billboard advertising and owes around 19 thousand to Montenegro Metropolis Media.

| Supplier                    | Total amount | Paid   | Remaining<br>debt |
|-----------------------------|--------------|--------|-------------------|
| Montenegro Metropolis Media | 96,465       | 77,743 | 18,723            |

Table 4: Debts of candidate Milo Đukanović at the time of submitting the official report



https://www.mans.co.me/en/

https://www.youtube.com/user/nvomans https://www.facebook.com/nvo.mans www.twitter.com/nvomans www.instagram.com/nvo.mans