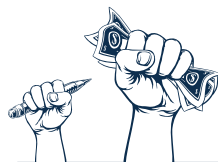
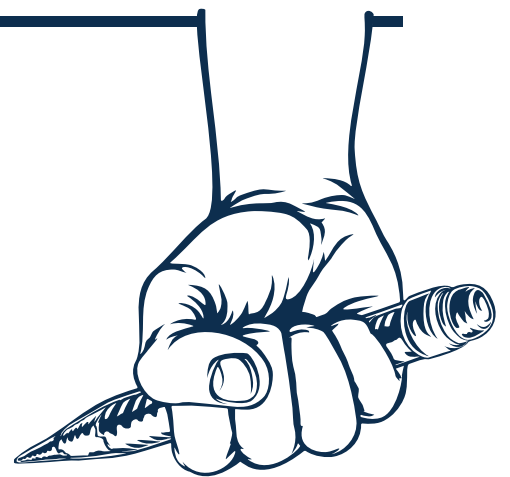




REPORT ON THE FINANCING OF
ELECTION CAMPAIGNS

PARLIAMENTARY ELECTIONS 2023



Impressum

TITLE:

Report on the financing of election campaigns

PARLIAMENTARY ELECTIONS 2023

PUBLISHER:

Network for Affirmation of NGO Sector – MANS

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Print:

3M Makarije

Edition: November 2023

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INTRODUCTION

MANS monitored the financing of the campaign for the extraordinary parliamentary elections that were announced on March 17 and held on June 11, 2023.

15 electoral lists participated in those elections, and during the election campaign, MANS monitored their activities and collected data on rallies, promotional videos and various materials. In particular, we monitored TV stations with national frequency and collected information on the advertising of each electoral list. We also collected advertisements from print media, as well as information about advertising on certain social media platforms.

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

This document contains an analysis of official data on campaign revenues and expenses of each electoral list. [1] It indicates the possible hiding of certain expenses and provides evidence that confirms their existence.

A special part of the report is devoted to the analysis of paid and free media advertising of electoral lists, both by public and commercial broadcasters.

During the election campaign, we monitored the spending of state institutions, in particular the short-term employment. We collected information on the expenses of all state bodies and compared them with the expenses in the same period of the previous year, as well as with the planned spending dynamics. That information is presented in a separate section of the report.

Based on the observed irregularities, we submitted reports to the competent Agency for Prevention of Corruption, thus, a separate part of this document deals with the practice of that institution.

Detailed data on official revenues and expenses of all electoral lists, as well as on public spending during the election campaign, are available at www.cistakampanja.me.

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

[1] Report on the expenses of the election campaign of the political entity - "Yes, we can! - For Civic Montenegro" on the website of the Agency for Prevention of Corruption was published after the legal deadline and the analysis of official data processed in Chapter 1 of this report.

ABSTRACT

REVENUES AND EXPENSES: Total reported revenues of all electoral lists for the campaign for the parliamentary elections were about one million euros, while the official expenses amounted to about three million.

DEBTS: It cannot be determined from official reports whether the electoral lists paid about two million i.e. two thirds of the reported expenses of the election campaign. Imprecise legal provisions do not oblige any institution to determine whether electoral lists pay their debts or whether they represent hidden donations.

FOREIGN INFLUENCE: Alarming donations from a private company founded by another country have been noted, which is not prohibited by law, but leaves room for funding from the abroad. Electoral lists reported significantly lower amounts of donations from natural persons than in the previous election cycles.

RELATED COMPANIES: Many companies that provided valuable services in the election campaign were directly related to certain political parties, which increases the risk of hidden financing. Those suppliers were in conflict of interest when they provided services to other electoral lists, which is not specifically regulated by law.

HIDING OF EXPENSES: Most of the electoral lists did not show all the expenses in the official reports on the financing of the election campaign. Most often, the expenses of advertising on social networks and in the media were hidden, as well as production of videos, per diems, transportation, and public opinion polls, i.e. overhead and administrative expenses.

FREE MARKETING: Duration of free media coverage on commercial TV stations is not precisely regulated by the law, which leaves a huge space for covert marketing. In addition to the national and local public broadcasters which are not allowed to charge political parties for advertising, all private TV stations had free media coverage of electoral lists. Some public broadcasters, and especially commercial media, favoured certain political structures in their free programme.

INCREASED PUBLIC SPENDING: Public spending increased during the election campaign, and in particular, payments to natural persons from the budget reserve increased. During the campaign, 45 state institutions spent more than planned, while some increased their spending several times.

INCREASED EMPLOYMENT: The practice of increased pre-election employment in the state administration continued. During the campaign, over 800 thousand euros more was paid from the budget for temporary employment contracts than in the same period of the previous year. The institutions reported that they had concluded almost 17 thousand employment contracts during the campaign, by which nearly five thousand people were hired.

NON-TRANSPARENCY: Monitoring of the state spending has been largely limited by the practice of some institutions to declare their transactions secret. Most state-owned companies hid employment data during the election campaign.

INADEQUATE CONTROL: The restriction of public spending and short-term employment during the election campaign has been rendered superfluous in practice. The competent Agency for Prevention of Corruption does not conduct a detailed control, acts with great delay and with its interpretations, it narrows the restrictions prescribed by the law.

ANALYSIS OF OFFICIAL REPORTS ON THE FINANCING OF ELECTION CAMPAIGNS



All electoral lists reported a total of around one million euros in revenues for financing the campaign for the parliamentary elections, and expenses of three million euros. [2] After the elections, most of the electoral lists had large debts, but thanks to the imprecision of the legal provisions, no institution conducts control whether they were paid or whether they actually represent hidden donations.

Reported donations are significantly lower than in the previous election cycles, while the donations of a private company founded by another state are especially worrying, because this could open a space for financing from the abroad.

The official reports show the reduced expenses of advertising on social networks and in the media, creating of videos, per diems of the activists, transportation, and especially public opinion polls and overhead-administrative expenses.

Many of the companies that provided services in the election campaign are directly connected to the parties, which also leaves room for hidden donations.

[2] Revenues and expenses of the citizens' group "Yes, we can! - For Civic Montenegro" are not included because their report on the election campaign expenses was published after the legal deadline and the analysis of official data processed in this chapter.

1.1. Reported revenues



All electoral lists reported a total of around one million euros in revenues for the financing of the campaign for parliamentary elections. [3] The largest part of reported revenues are budget funds, and only two electoral lists reported loan debts. Reported donations, especially from natural persons, are significantly lower than in previous election cycles, however, they are still controversial. Of particular concern are donations from a private company founded by another state.

The Europe Now movement (PES) collected the most revenues for the election campaign, nearly 350 thousand euros. In second place is the Social Democratic Party (SDP) with around 120,000.

In third place is the Movement for Changes (PZP) with less than 70,000 euros, and the coalition of Democratic Montenegro (Democrats) and the Civic Movement URA (URA) with 64,000 euros.

Coalition For the Future of Montenegro (ZBCG) reported revenues of less than 60 thousand, the Socialist People's Party (SNP) of around 55 thousand. All other electoral lists reported revenues between 40 and 50 thousand euros.

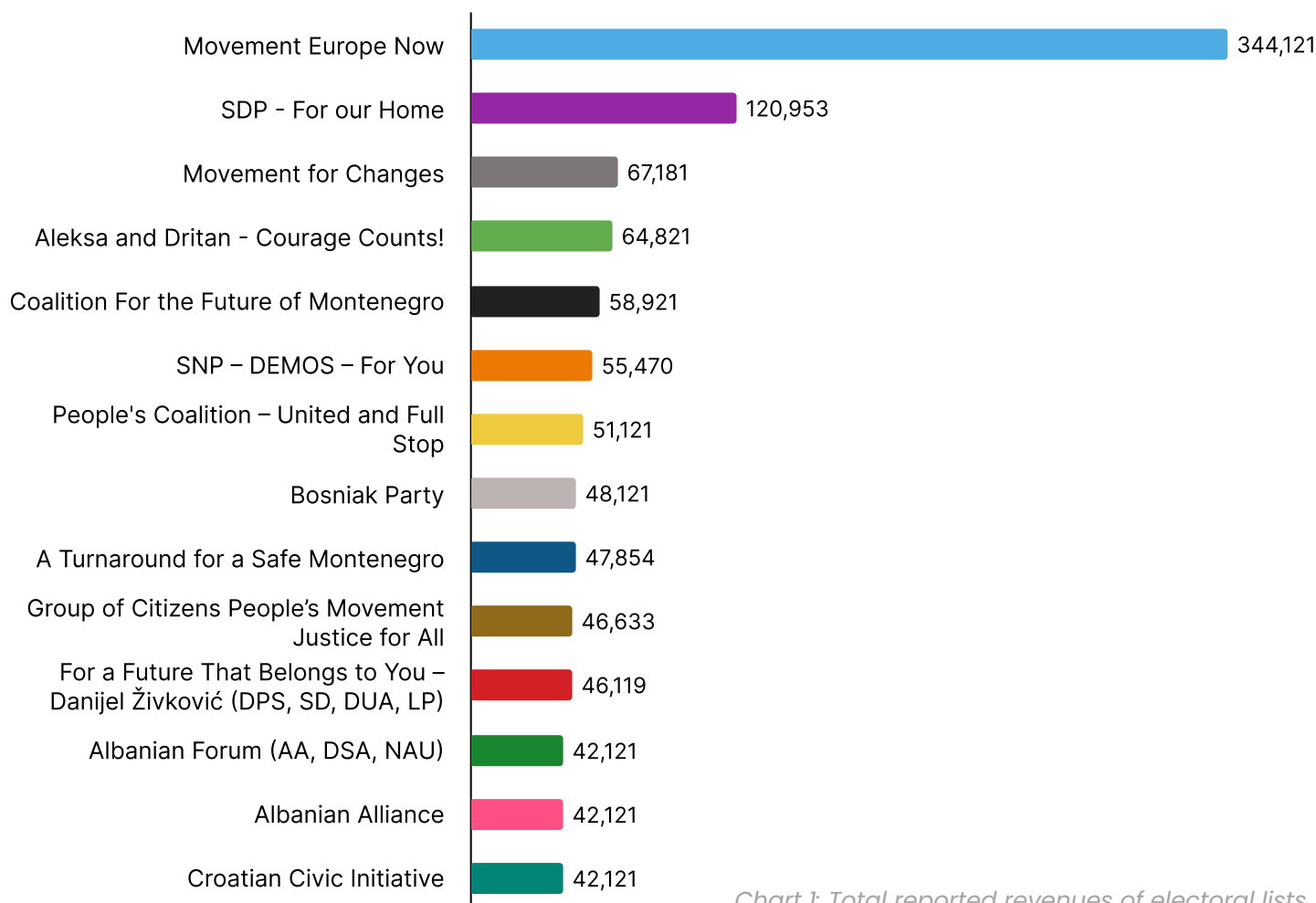


Chart 1: Total reported revenues of electoral lists

[3] Total reported revenues of the citizens' group "Yes, we can! – For Civic Montenegro" were 45,921.39 euros. In addition to budget revenues amounting to 42,121.39, they reported 3,800 euros in donations, based on two contributions of 1,800 and 2,000 euros each.

1.1.1. Structure of reported revenues

Budget funds make up around 55% of the total reported revenues in the campaign. Budget funds are not the dominant source of campaign financing for only two electoral lists, i.e. PES, which took a loan of 300,000 euros, and SDP, with a loan of around 70,000.

In second place are own funds with around 6%. This is money from the account for regular financing of the parties, which was redirected for campaign expenses. The initial source of these funds is not specified, they can come from budget funds for regular financing of the parties, but also from private donations to parties.

The largest amount of own funds was reported by the Movement for Changes, 25 thousand euros. In second place is the coalition of Democrats and URA with 20,000, SNP is in third place with 11,000, and SDP which reported seven thousand.

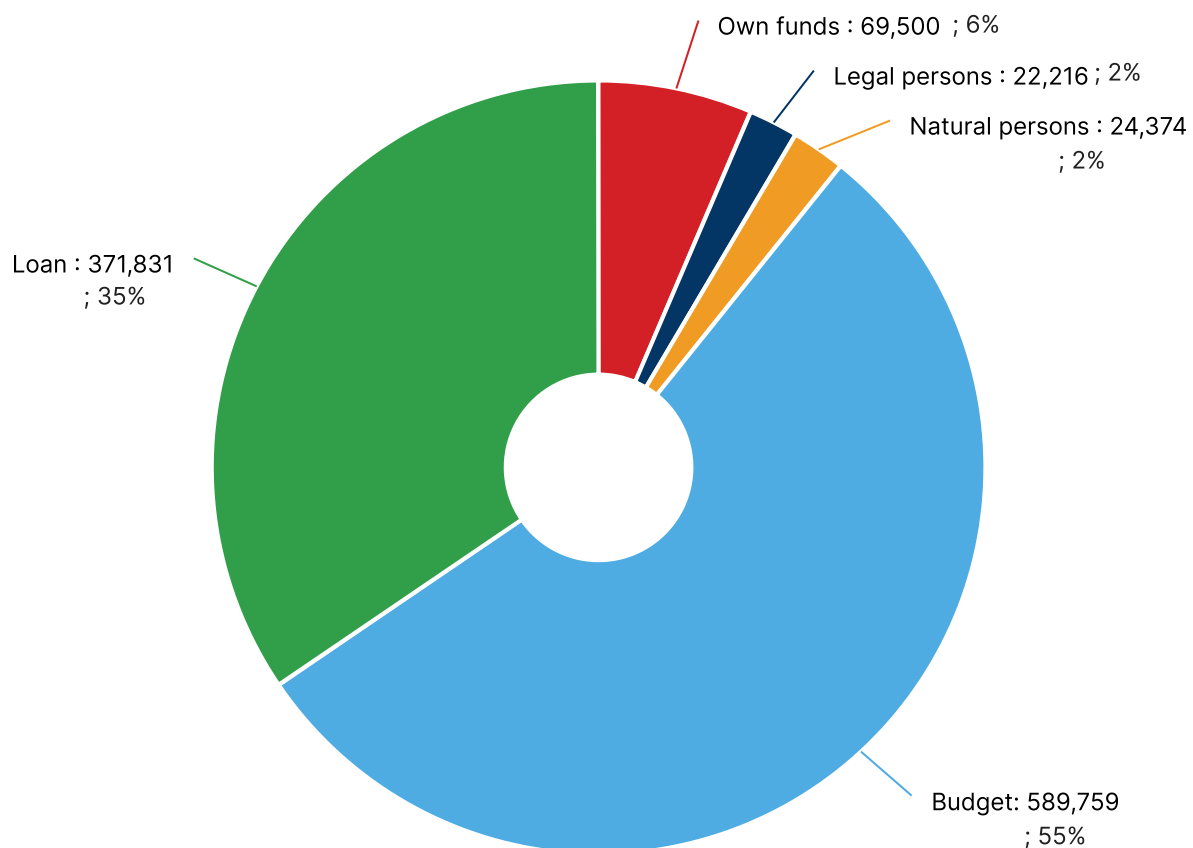


Chart 2: Structure of reported revenues in the campaign

Donations from natural and legal persons account for only 2% of the reported revenues of electoral lists. The ZBCG coalition reported nearly 17,000 in donations from companies, the People's Coalition-United and Full Stop nine thousand, A Turnaround for a Safe Montenegro 5.7 thousand, Group of Citizens People's Movement Justice for All 4.5 thousand, the coalition gathered around DPS less than four thousand, Democrats and URA 2.7 thousand, movement Europe Now 2 thousand, and SNP around 1.8 thousand euros.

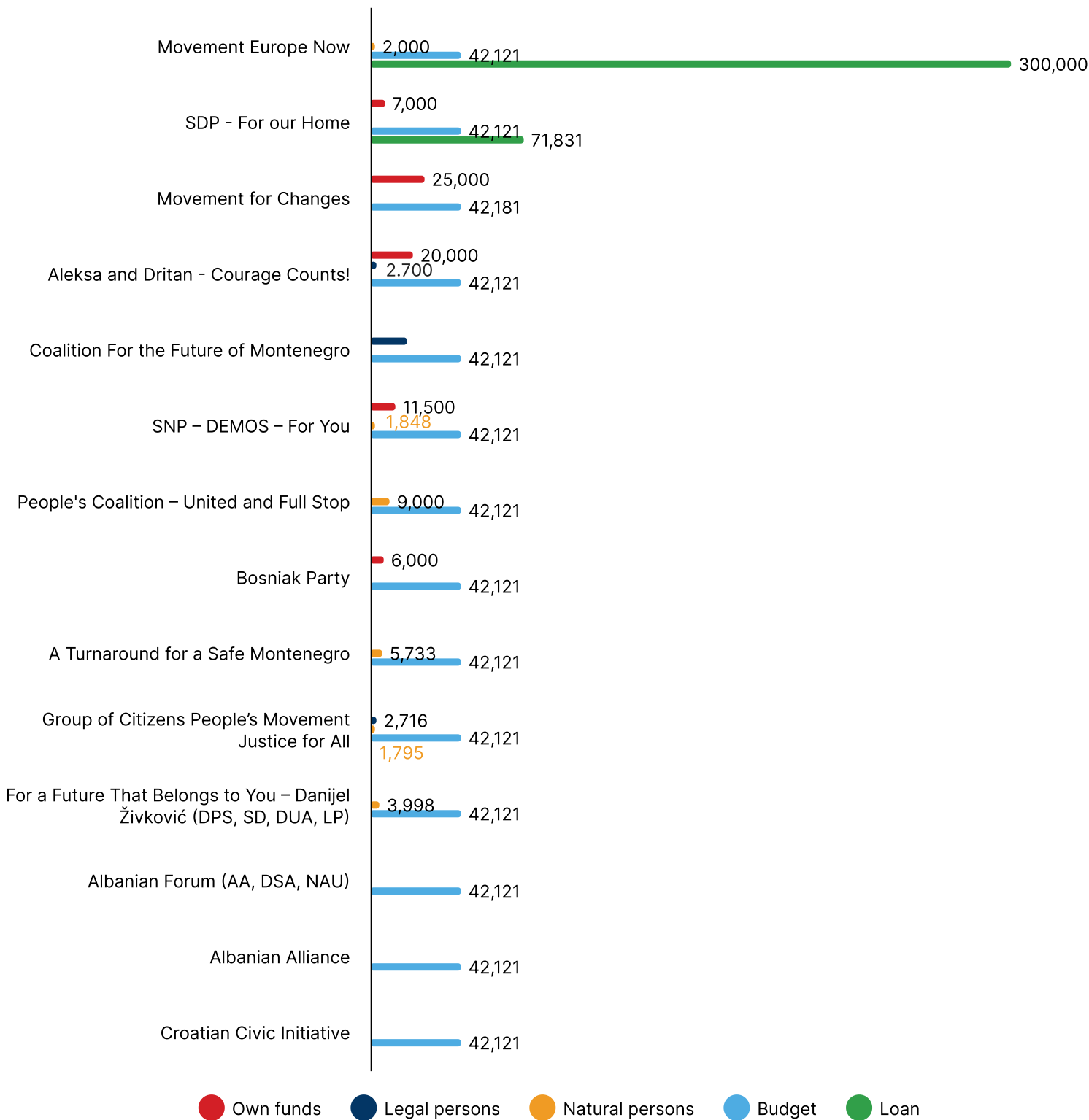


Chart 3: Revenues of electoral lists by sources

Electoral list	Budget	Loan	Natural persons	Legal persons	Own funds	Total
Albanian Alliance	42,121.39					42,121.39
Albanian Forum (AA, DSA, NAU)	42,121.39					42,121.39
Aleksa and Dritan - Courage Counts!	42,121.39			2,700.00	20,000.00	64,821.39
Bosniak Party	42,121.39				6,000.00	48,121.39
Group of Citizens People's Movement Justice for All	42,121.39		1,795.00	2,716.11		46,632.50
Croatian Civic Initiative	42,121.00					42,121.00
Coalition For the Future of Montenegro	42,121.39			16,800.00		58,921.39
People's Coalition – United and Full Stop	42,121.39		9,000.00			51,121.39
“Europe Now” Movement	42,121.39	300,000.00	2,000.00			344,121.39
Movement for Changes	42,181.23				25,000.00	67,181.23
A Turnaround for a Safe Montenegro	42,121.39		5,732.61			47,854.00
SDP – For our Home	42,121.39	71,831.38			7,000.00	120,952.77
SNP-Demos- For You	42,121.39		1,848.15		11,500.00	55,469.54
For a Future That Belongs to You -Danijel Živković (DPS-SD-DUA-LP)	42,121.39		3,998.00			46,119.39
Ukupno	589,758.91	371,831.38	24,373.76	22,216.11	69,500.00	1,077,680.16

Table 1: Revenues of electoral lists by sources

1.1.2. Reported donations by natural and legal persons

Pursuant to the Law on Financing of Political Entities and Election Campaigns, political entities, i.e. political parties, coalitions and groups of voters, within and for the purposes of the campaign for the elections of MPs and councillors, may raise funds from private sources, i.e. from natural and legal persons. [4]

Compared to previous election cycles, when the total funds voluntarily donated by citizens and/or companies exceeded amounts of several hundred thousand euros, while the origin of part of that money was most often left unexplained until the end, the amount of donations from natural and legal persons collected for parliamentary elections is only around 50,000 euros, judging by the reports on the election campaign expenses of the participants in the elections. [5]

Case study:

Donations of a company established thanks to the Government of Serbia

Largest amount of donation, 15 thousand euros, was given to the ZBCG coalition by "Srpska kuća" ten days before the elections. "Srpska kuća" is officially registered as a limited liability company from Podgorica that performs administrative and auxiliary service activities, i.e. organizing meetings and fairs.

The company's website states that it was established thanks to a donation from the Government of the Republic of Serbia: "With a donation from the Serbian Government, business premises were purchased and equipped, and the necessary conditions for the work of Srpska kuća were created. [6]

"Srpska kuća" is located in the very centre of Podgorica, it owns six business premises with a total area of 1,258m², as well as 21 garage spaces. The company bought the real estate in May 2017, at a price of over 3,300,000 euros. [7]

Among the founders of "Srpska kuća" are several government officials, including Milutin Đukanović, the chairman of the Board of Directors of "Montenegrin Electric Enterprise", Vladimir Božović, the rector of the University of Montenegro, and Vladislav Bojović, until recently the director general for payments in the Ministry of Agriculture, Forestry and Water Management. and now a deputy in the new convocation of the Parliament of Montenegro. [8] Apart from them, the other founders are party officials or individuals close to the former "Democratic Front" movement.

In recently held presidential elections, "Srpska kuća" donated 20,000 euros to the campaign of candidate Andrija Mandić, who was second on the list of MPs for the June Parliamentary elections, behind the chief candidate Milan Knežević.

It is interesting that this company which, according to official financial reports, operates at a loss, during the entire last year had a total income of around 300 thousand euros, while this year, it officially allocated 35 thousand euros for financing two election campaigns.

[4] Art. 23 of the Law on Financing of Political Entities and Election Campaigns ("Official Gazette of Montenegro", No. 3/2020 and 38/2020).

[5] The exact amount is 47,673.76 euros.

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

[7] The exact amount is 3,388,950.41 euros.

[8] See at: <https://www.vijesti.me/tv/emisije/670833/vise-poslanika-koji-objavljaju-duple-funkcije-ponedjeljak-rok-za-ostavke>.

Case study:

Unlawful donations of a company that concluded a public procurement contract

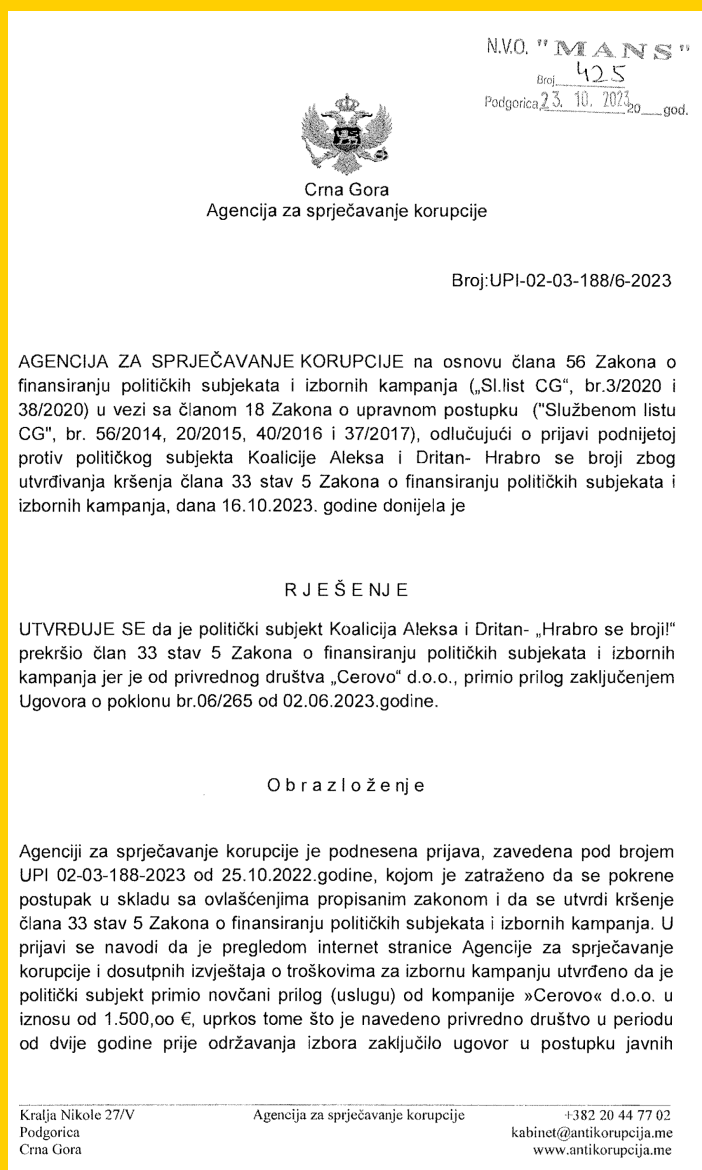
The company "Cerovo" gave products worth 1.5 thousand euros to the coalition of Democrats and URA. That company is owned by the Minister of Economic Development and Tourism, Goran Đurović, who suspended his management rights due to the holding of the aforementioned public office.

The donation of that company's products is against the law, bearing in mind that "Cerovo" concluded a public procurement contract with the local company "Water Supply and Sewerage" from Bar in the last two years. [9]

This is a limitation prescribed by the Law on Financing of Political Entities and Election Campaigns, which reads: *„Legal entities, companies and entrepreneurs and related natural persons which, based on a contract with the competent bodies and in accordance with the Law, performed activities of public interest or concluded a contract through the public procurement procedure, in the period of two years preceding the conclusion of the contract, for the duration of the business relationship, as well as two years after the termination of the business relationship shall not give contributions to the political entities.“* [10]

MANS reported this case to the Agency for Prevention of Corruption (APC) [11], which made a decision to initiate proceedings against the aforementioned political entity ten days after the report was submitted. More than a month after submitting of the report, at the end of October 2023, the APC determined that the coalition of Democrats and URA had violated the law

A similar practice was noted in the case of the campaign of the newly elected president Jakov Milatović, which was helped by the company "Centroslavija" by donating a service worth 1,000 euros, even though it had participated in public procurement in the last two years. MANS reported this case to APC, which did not discover it while supervising the implementation of the law. At the end of June 2023, that institution initiated proceedings against Milatović in order to establish a violation of the cited provision of the law, but by the time of publishing this report, the decision was not made.



Excerpt from the decision of the APC determining a violation of the law in the case of a donation from the company "Cerovo"

[9] Contract no. 5428 from 01.09.2021, Contract on the public procurement of bulk construction materials worth 7,260 euros.

[10] Art. 33, paragraph 5 of the Law on Financing of Political Entities and Election Campaigns.

[11] Report of NGO MANS No. 425, submitted on September 15, 2023.

Case study: DPS' donations ran dry?

The coalition gathered around DPS collected only four thousand euros thanks to donations of its six officials, members and/or supporters. [12] Party officials Aleksandar Žurić and Aleksandar Bogdanović donated 999 euros each, while Zoja Bojanić Lalović gave a contribution of 500 euros. Party members Danilo Ratković and Lidija Moračanin contributed the same amount, while additional 500 euros was paid by a certain Mirjana Bošković, for whom there is no information whether she is an official member of this party, or other parties from the coalition.

It is a modest amount compared to the money that DPS usually collects from its officials, members or supporters for the purposes of the election campaign, which is a process that MANS had previously investigated as well, and which turned out to have the features of injecting money from the so-called black funds, bearing in mind that socially vulnerable citizens and workers of local companies financially helped the party campaign, and that the officials paid the money most often on the same day and in the same bank. [13] Symptomatically, these six donations were paid on the same day – May 25, 2023.

For example, for the previous parliamentary elections, DPS collected half a million euros from voluntary contributions for campaign purposes, while the recent president of the party and Montenegro collected around 210,000 euros for his campaign in recently held presidential elections. [14]

[12] The exact amount is 3,998 euros.

[13] See at: <https://www.mans.co.me/en/?p=8311>,

<https://www.mans.co.me/en/?p=8262>,

<https://www.mans.co.me/en/?p=8240>,

<https://www.mans.co.me/socijalni-slucajevi-finansirali-kampanju-dps-a/>,

<https://www.mans.co.me/en/?p=7093>.

[14] The exact amounts are 496,452 euros and 213,649 euros.

Other donations

The coalition "United and Full Stop", whose leaders were Dejan Vukšić, former director of the National Security Agency (NSA) and Marko Milačić, until recently a member of the Parliament of Montenegro, had two individual donations of 4,000 and 5,000 each, which amounts to 9,000 euros.

"Turnaround" movement, which was led by the former member of the Parliament of Montenegro, Srđan Perić, collected the amount of 5,700 euros, predominantly from members and individuals who were on the list of Turnaround. [15]

The Europe Now movement reported only one donation - in the amount of 2,000 euros, which was paid by a certain Boris Atanasov, the owner of the travel agency "Fly Montenegro Travel" from Podgorica. [16]

The **ZBCG** coalition also received a donation from the company Mediteran Travel in the form of a service worth 1.8 thousand euros. It is a company from Budva whose owner is Jovan Dokić, who is also the owner of the company "Mediteran Express", also from Budva. That other company of his has an active contract with the Municipality of Budva, for which the APC found it threatened the public interest. [17]

Socialist People's Party (SNP) - Demos, which participated in the coalition, reported 1,800 euros in contributions received from one natural person. [18]

The "Justice for All" movement, whose chief candidate is the former Minister of Justice Vladimir Leposavić, states in the report on the expenses of the election campaign that they had a total of 1,795 euros in contributions from natural persons. In addition, two reported donations from legal entities of the People's Movement "Justice for All" represent the return of unused funds to the account by the company Google which total 2.7 thousand euros.

The coalition of **Democrats and URA** also received a non-financial donation of 1,200 euros in the form of services from the company "Ara" from Nikšić, whose owner is Nikola Kočalo, an entrepreneur from Nikšić and a former official of Positive Montenegro.

[15] The exact amount is 5,732.61 euros.

[16] Taxpayer Identification Number: 03018997, see at: <https://www.flymontenegro.aero/en/home>.

[17] <https://www.vijesti.me/vijesti/drustvo/660550/sumnja-na-korupciju-u-prevozu-djaka-i-penzionera>.

[18] The exact amount is 1,848.15 euros.

1.2. Reported expenses



All electoral lists reported that they had spent around three million euros in the election campaign. [19] However, many lists reported lower campaign expenses and their reports do not contain real data.

The official reports show the reduced expenses of advertising on social networks and in the media, creating of videos, per diems of the activists, transportation, and especially public opinion polls and overhead-administrative expenses.

Largest parties use the same suppliers for every election cycle, which are usually directly connected to those parties. Those suppliers are in a conflict of interest when they provide services to other parties.

Total reported expenses of the campaign financing by all electoral lists were around three million euros.

Three quarters of the total reported campaign expenses relate to the four largest political entities, as follows:

- DPS with nearly 900 thousand or close to 30% of the total reported campaign expenses,
- Coalition of Democrats and URA with 540 thousand euros or 18% of total expenses,
- ZBCG coalition with 475 thousand or 16% of total expenses,
- Europe Now with nearly 390 thousand or 13% of the total campaign expenses.

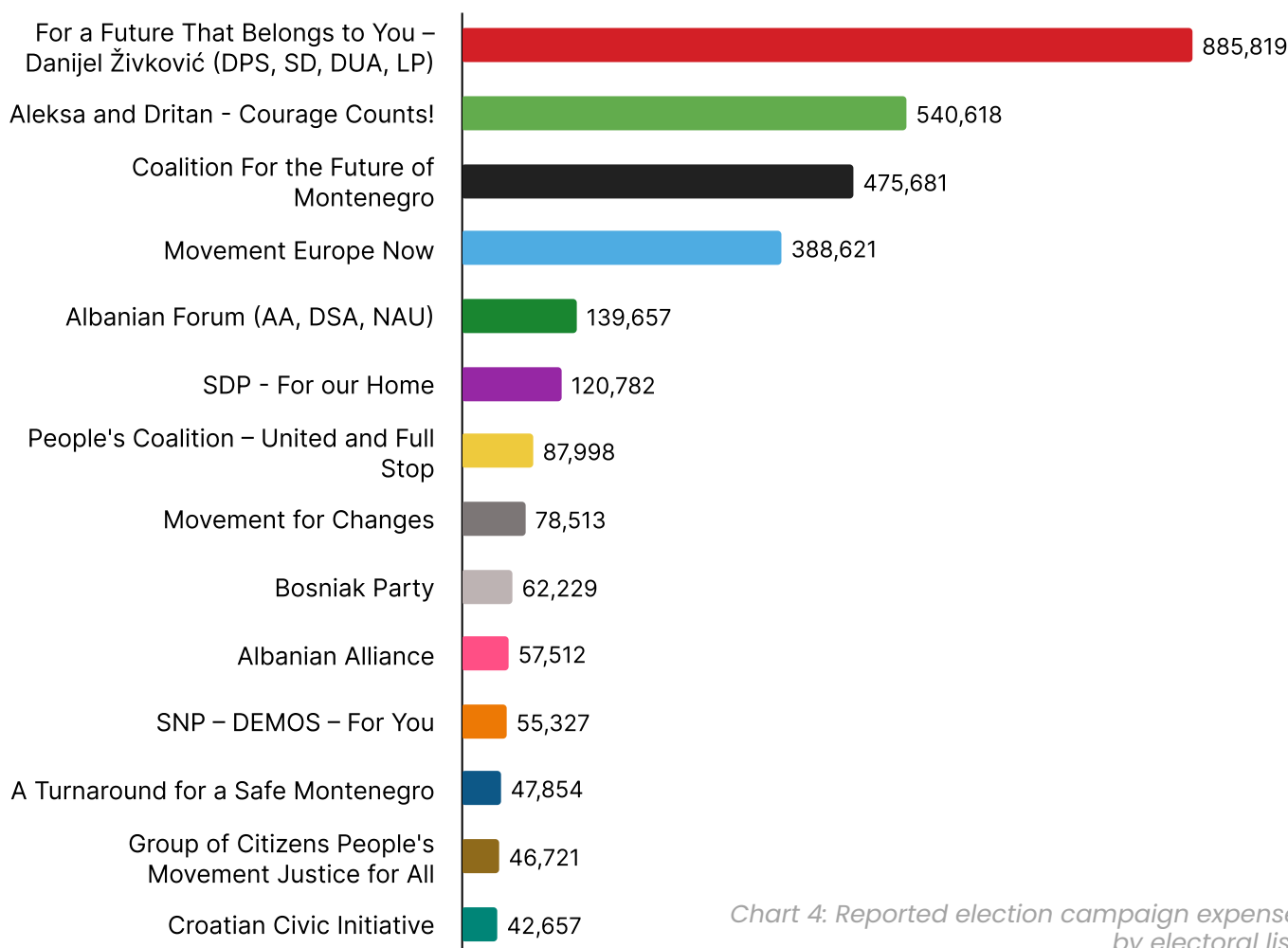


Chart 4: Reported election campaign expenses by electoral lists

[19] Total reported expenses of the citizens' group "Yes, we can! - For Civic Montenegro" were 50,002.14 euros.

1.2.1. Structure of the reported expenses

Based on data from official reports, three large groups of reported campaign expenses can be singled out:

- The media – to which more than 1.2 million euros or more than 40% of the total campaign expenses refer,
- Advertising material – which accounts for over 700 thousand euros i.e. nearly a quarter of total expenses,
- Other expenses – which amount to nearly 600 thousand euros and make up almost a fifth of the total nearly.

Reported expenses of the rallies were about 220 thousand euros, less than 110 thousand was officially allocated for activists, administrative and overhead expenses were around 66 thousand, transportation around 56 thousand, while public opinion polls officially cost around 27 thousand euros.

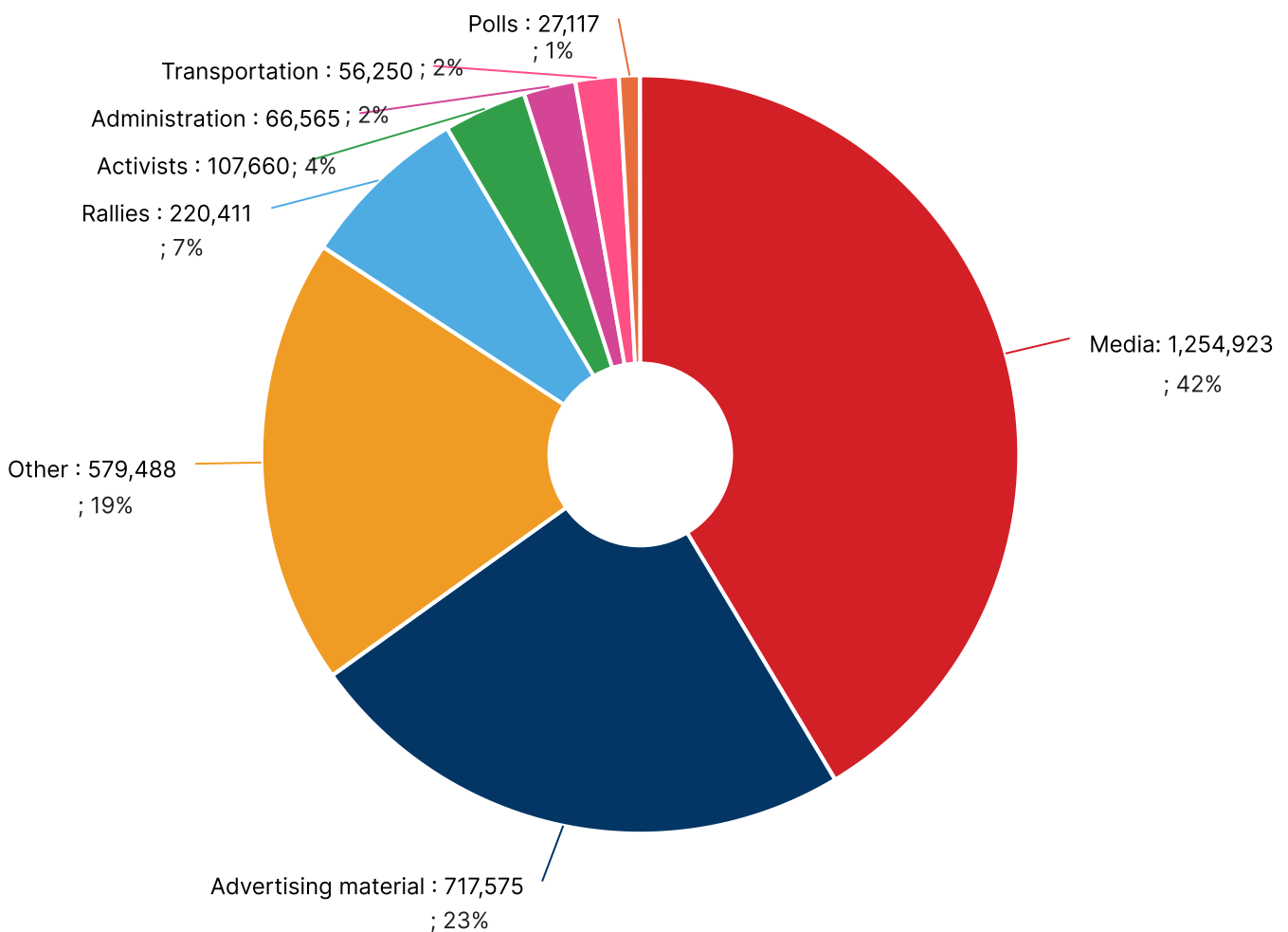


Chart 5: Structure of reported expenses – data from reports

However, electoral lists did not consistently categorize campaign expenses, especially when it comes to the categories of media advertising and advertising material, which are provided by the official reporting template. For example, most parties reported TV advertising as an expense within the media category, but some presented this expense within advertising materials. In addition, a large number of electoral lists paid per diems to activists, but reported them as expenses for the organization of rallies.

In order to be able to compare the data, we re-categorized the expenses of all electoral lists. According to that re-categorized data, three groups of largest expenses are also singled out, as follows:

- Advertising material worth around 1.2 million euros i.e. over 40% of the total expenses,
- Advertising in the media for which the reported expenses are nearly 900 thousand i.e. around 30% of the total amount,
- Activists who were paid per diems and fees worth over 380 thousand euros, which represents about 12% of the total reported expenses of the campaign.

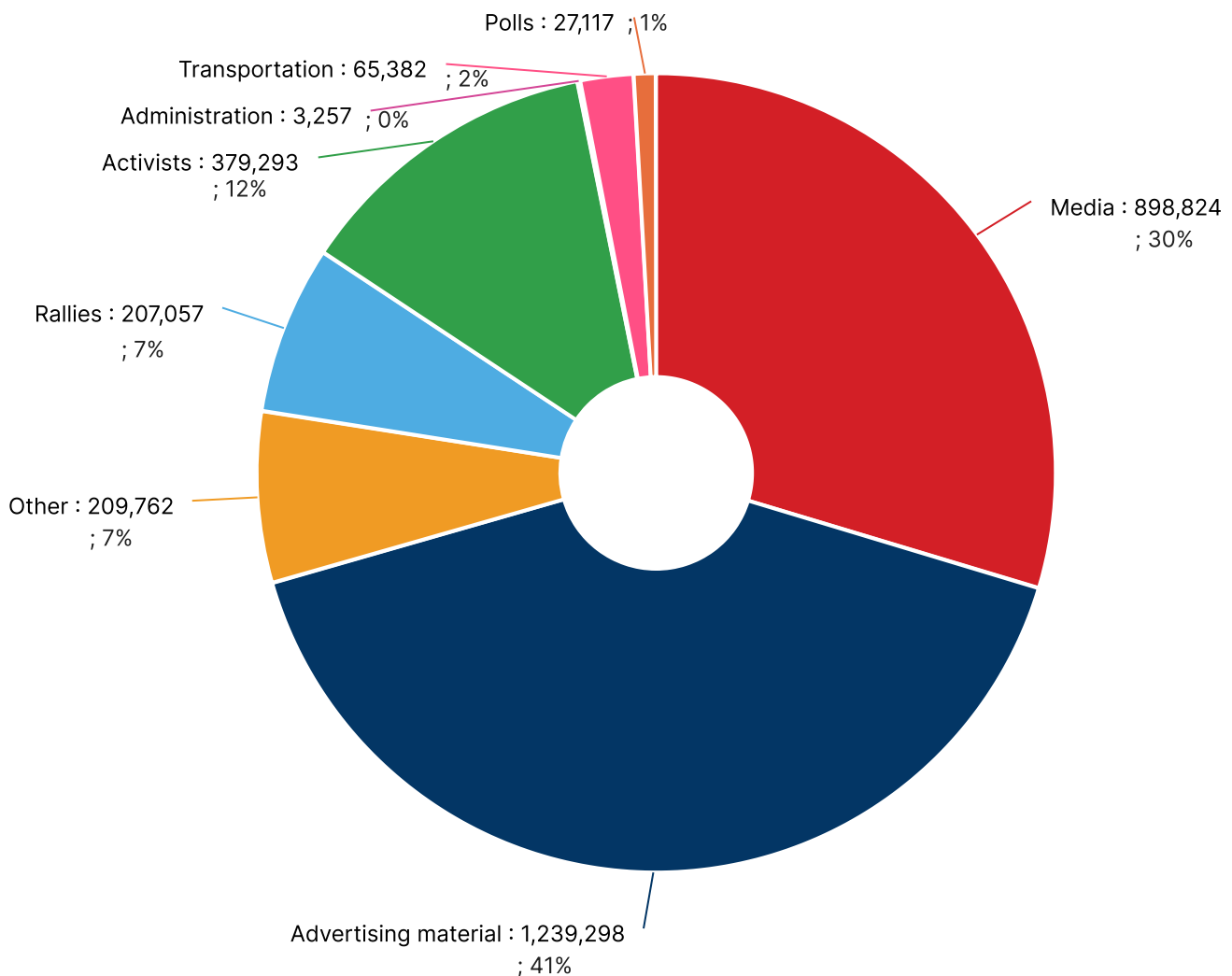


Chart 6: Structure of reported expenses – re-categorized data

1.2.2. Analysis of the reported expenses of advertising materials

Nearly half of the reported expenses of advertising materials relate to the production of printed materials (45%), while around 30% relate to billboards. In third place are the expenses of material design and video production, and they account for around 23% of the total expenses of promotional materials.

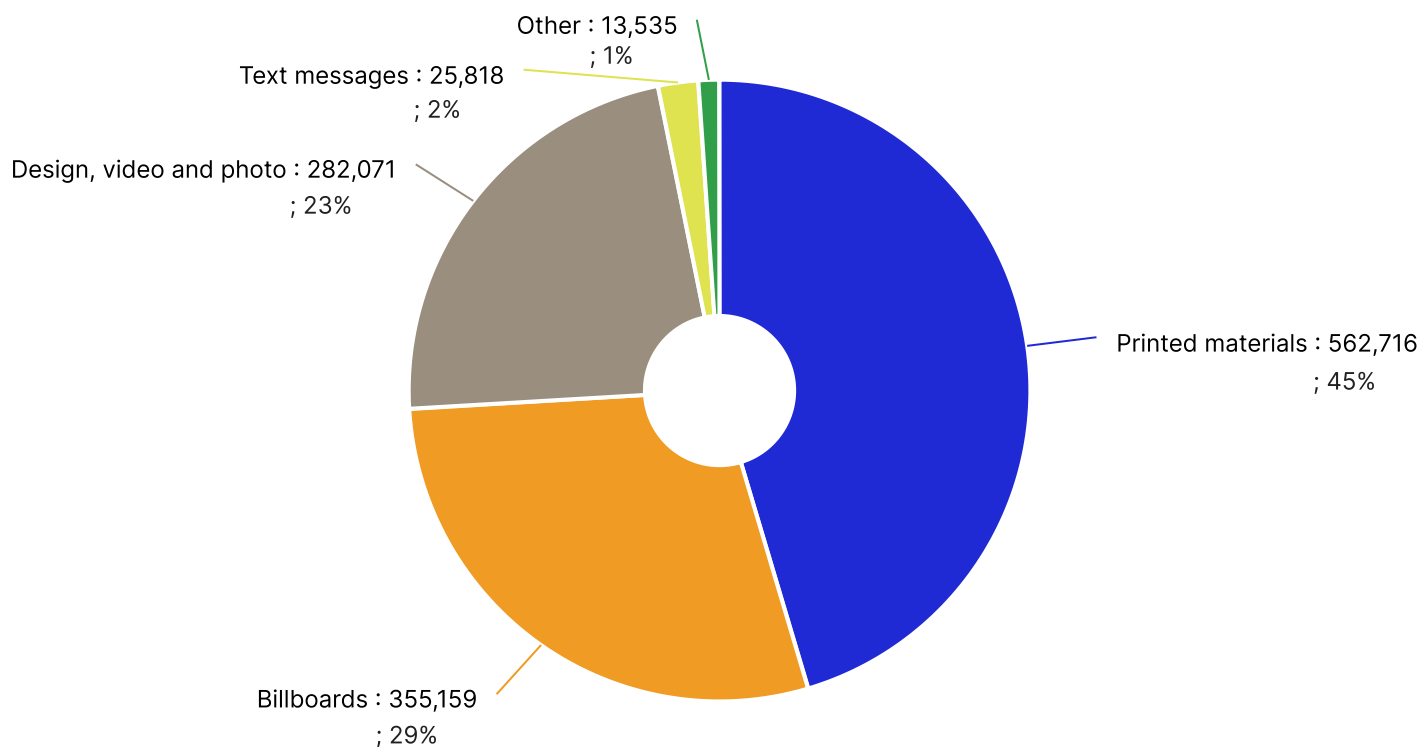


Chart 7: Types of advertising material expenses

Largest expenses of promotional materials were reported by the coalition gathered around DPS, over 420 thousand euros, and they spent almost half of that amount on the production of printed materials, one third on design, while they spent around 16% of the total expenses of promotional materials on billboards.

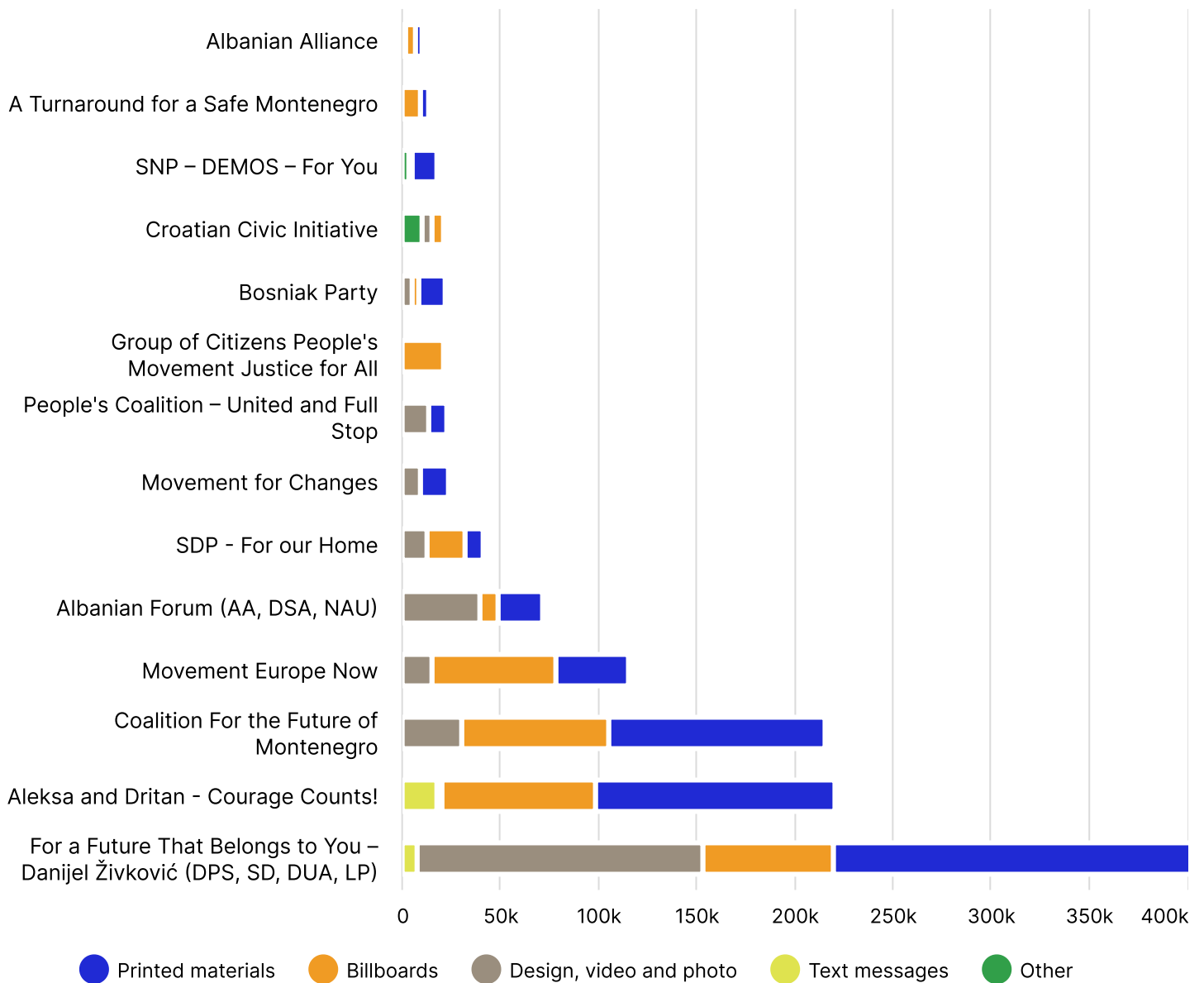


Chart 8: Type of expenses of advertising material by electoral lists

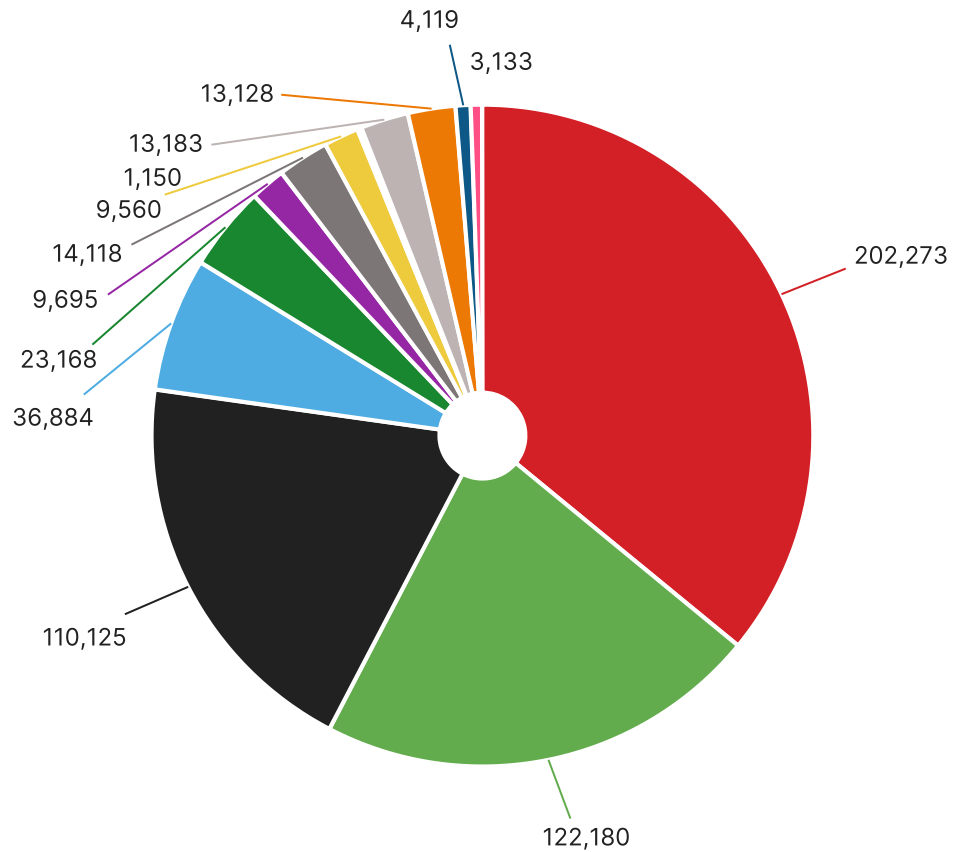
In second place is the coalition of Democrats and URA, with over 220,000 euros in reported expenses of promotional materials, of which around 55% refers to printed material, around 35% to billboards, and only 1% to design and production of videos

ZBCG coalition is in third place with reported expenses of promotional materials of around 215 thousand euros, half of which refers to printed materials, 35% to billboards, and 14% to design and production of videos.

The Europe Now movement reported 115 thousand euros in expenses of promotional materials, dominated by billboards (55%) and printed materials (32%), while the expenses of designing and making of videos are around 13%.

1.2.2.1. Printed materials

Largest expenses of printed materials were reported by the coalition gathered around DPS, over 200 thousand euros, in second place is the coalition of Democrats and URA with over 120 thousand, in third place by ZBCG with 110 thousand, and in fourth place by PES with less than 37 thousand euros.



- For a Future That Belongs to You – Danijel Živković (DPS, SD, DUA, LP)
- Coalition For the Future of Montenegro
- Aleksa and Dritan – Courage Counts!
- Movement Europe Now
- Albanian Forum (AA, DSA, NAU)
- SDP - For our Home
- Movement for Changes
- People's Coalition – United and Full Stop
- Group of Citizens People's Movement Justice for All
- Bosniak Party
- Croatian Civic Initiative
- SNP – DEMOS – For You
- A Turnaround for a Safe Montenegro
- Albanian Alliance

Chart 9: Reported expenses of printed materials, by electoral lists

Largest suppliers of printed materials were Ras Press LLC with nearly 110 thousand euros, Dale Company with nearly 55 thousand, Krstaš Company, DPC LLC and M Promo with around 40 thousand each, Mouse studio and Print House with around 30 thousand, and MAPA with 25 thousands of euros of registered services.

Most suppliers provided printing services for only one electoral list, while the largest parties use the same suppliers in every election cycle.

Thus, ZBCG coalition was the only user of the services of Ras Press, and there is no information that its owners are connected with any political party. [20]

On the other hand, Dale Company and Krstaš Company provided their services exclusively to the coalition gathered around DPS. Until 2017, Dale Company was registered to Aleksandar Damjanović (Montenegrin Cultural Network-CKM), and after that, it was transferred to Mileva Damjanović. That company reported an income of less than 90 thousand euros during the entire last year, and in the campaign for the parliamentary elections, it produced printed materials for DPS worth nearly 55 thousand euros.

Krstaš Company from Nikšić is owned by Luka Simović, its total income last year was less than 13 thousand euros, and in this campaign, it sold services worth around 40 thousand euros to DPS. [21]

The company DPC LLC provided services only to DPS (35 thousand euros) and SDP (3.5 thousand). The owner of the DPC company, Mirko Đurić, also has 50% of share in the Sato company, which in 2013 privatized the hotel "Nikšić" in Sutomore as part of the Hotel and Tourism Enterprise "Onogošt" in Nikšić.

M Promo printed material for the coalition of Democrats and URA worth 37 thousand euros, while DPS reported that it had bought products worth 365 euros from that company. There is no information about the connection of the owner of that company with political parties. [22]

Mouse studio produced materials exclusively for the coalition of Democrats and URA, worth around 30 thousand euros, and no information can be found about connection of the owner of that company, Miloš Vukčević, with political parties.

Print House produced materials for Europe Now worth around 23 thousand euros, as well as for the People's Coalition worth less than seven thousand. [23]

MAPA provided services that were officially worth around 25,000 euros, only to the coalition gathered around DPS. The owners of that company are Radmila Vojvodić (60%), the former rector of the University of Montenegro, who has multiple connections with DPS, and Vuk Eraković (40%).

[20] That company is owned by Slavica and Milisav Vujković from Nikšić, for whom there is no information about connection with political parties.

[21] There is no information about Simović's connection with political parties.

[22] The owner of that company is Maja Pejović from Danilovgrad, and there is no information about her connection with political parties.

[23] The owner of that company is a certain Tanja Vratnica, and no information can be found about her connection with political parties.

1.2.2.2. Billboards

Largest expenses of billboard rental were reported by the coalition of Democrats and URA, nearly 80 thousand euros, in second place was ZBCG with 75 thousand, followed by the coalition around DPS with around 66 thousand, and Europe Now with 63 thousand euros.

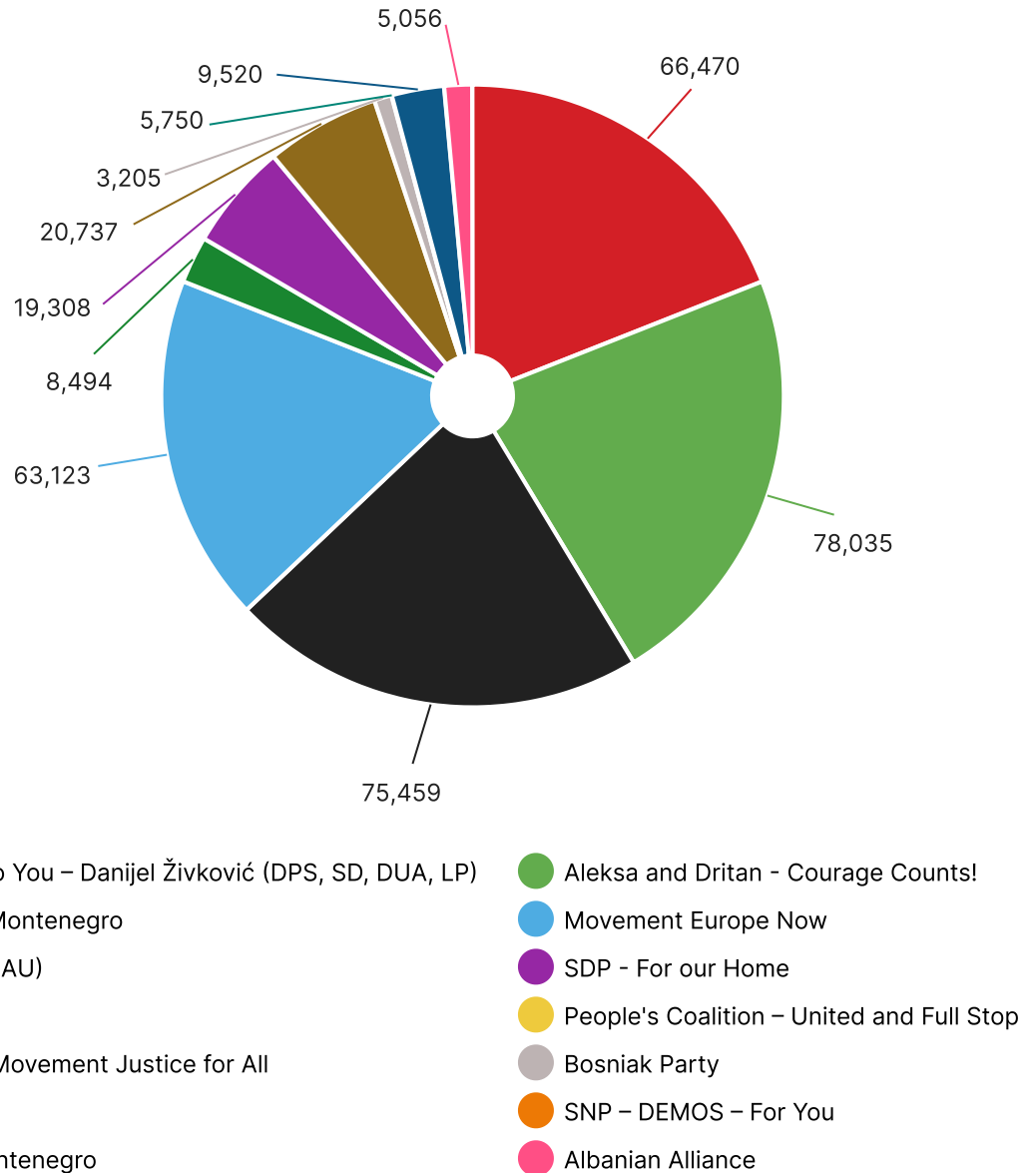


Chart 10: Reported expenses of billboards, by electoral lists

The companies "Đoković" LLC and Montenegro Metropolis Media are the largest suppliers of billboards, accounting for over 75% of all reported expenses for these types of services. Reported services of the company "Đoković" cost 190,000 euros, and the services of "Montenegro Metropolis Media" around 80,000 euros.

It is interesting that not a single electoral list was advertised by both companies, but they were strictly divided. Thus, the services of "Đoković" were used by the coalition for the Future of Montenegro, the Europe Now movement, Aleksa and Dritan – Courage Counts!, Group of Citizens People's Movement Justice for All and SDP – For our Home. The services of "Montenegro Metropolis Media" were used by the coalition gathered around DPS, the Turnaround for a Safe Montenegro, the Albanian Forum (AA, DSA, NAU), the Croatian Civic Initiative, the Albanian Alliance and the Bosniak Party.

The company "**Đoković**" is owned by Velimir Đoković, the chairman of the Danilovgrad Municipal Assembly, who is a member of the Main and Executive Board of the New Serb Democracy and the chairman of the municipal board of that party in Danilovgrad. [24] That company started developing the business with billboards in 2016 when, thanks to the business with Democratic Front during the parliamentary elections, there was a sharp increase in revenue from sales, but significant unpaid claims remained. [25] 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. [26]

The company "**Montenegro Metropolis Media**" is owned by Vidosava, Marina, Zdravko and Zoran Kovač, and it is one of the leading companies in Montenegro when it comes to advertising services. [27] In the past, the ownership structure of this company included offshore companies from Belize and Cyprus. [28] In addition to advertising services, the company entered the business of electricity production a few years ago, investing money in the construction of a small hydropower plant (sHPP) in Vrbnica, in the Municipality of Plužine. Through the company "Metro Energo", "Montenegro Metropolis Media" controls almost 30% of the share of mHE Vrbnica, while the Slovenian "Interenergo" has 70%, and the company "Mehanizacija i Programat" from Nikšić has a smaller share. [29]

[24] <https://www.danilovgrad.me/me/clanovi/velimir-dokovic> .

[25] MANS: Implementation of the Law on Financing of 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/2019/04/FPPen.pdf> .

[26] <https://www.gjokovicdoo.com/bilbordi> .

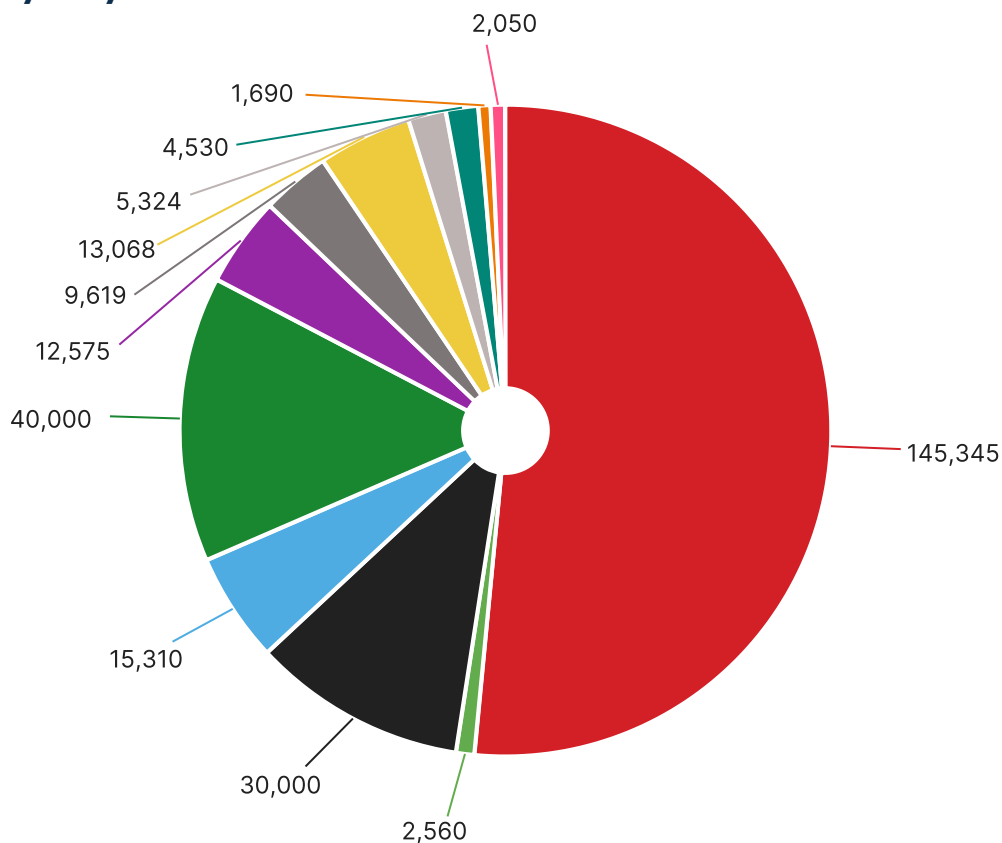
[27] See at: <https://metropolis-media.me/me/> .

[28] 2009: Ladybird Holdings LTD Belize, Stellite Limited Belize City; Farisa Holdings Limited, Abicon Holdings Limited .

[29] See at: <https://www.vijesti.me/vijesti/ekonomija/418758/uskoro-i-mala-elektrana-na-vrbnici-u-pluzinama> .

1.2.2.3. Design and creation of promotional videos

The highest expenses for the production of promotional videos and material design were reported by DPS, around 145 thousand euros. In second place was Albanian Forum with 40 thousand, in third place ZBCG with 30 thousand, and Europe Now with 15 thousand euros. The coalition of Democrats and URA reported extremely low expenses in this category, only 2.5 thousand euros.



- For a Future That Belongs to You – Danijel Živković (DPS, SD, DUA, LP)
- Coalition For the Future of Montenegro
- Albanian Forum (AA, DSA, NAU)
- Movement for Changes
- Group of Citizens People's Movement Justice for All
- Croatian Civic Initiative
- A Turnaround for a Safe Montenegro
- Aleksa and Dritan - Courage Counts!
- Movement Europe Now
- SDP – For our Home
- People's Coalition – United and Full Stop
- Bosniak Party
- SNP – DEMOS – For You
- Albanian Alliance

Chart 11: Reported expenses of creation of promotional videos and design of materials

The largest supplier of these services was **Studio Dogma**, which worked solely with the DPS coalition, and the reported expense was around 80,000 euros. The owner of the company "Studio Dogma" is Željko Sošić, a member of the Main Board of DPS and former artistic director of the Montenegrin National Theatre (CNP). [30] In previous two years, except this one - the election year, this company generated only 94 euros in revenue.

[30] See at: <https://dps.me/zeljko-sosic/> .

In second place is the company Digital BEE from Albania, which, according to official reports, provided the Albanian Forum with services worth 40 thousand euros. The owner of this Albanian company, based in Tirana, is a certain Endrit Masha.

The company DAA Montenegro provided services worth 30,000 euros only to the DPS coalition. The owners of this company are Nikola Radonjić, Srđan Tomović and Igor Marić, and there is no official information about their connection with political parties.

Media Biro LLC provided services worth around 18 thousand euros to DPS and around three thousand to SDP. The founder of this company is a certain Mirjana Mišurović. [31]

The company Easy Production also worked for DPS, from which it officially claims over 16 thousand euros. This company was founded in February 2022, and in its first year of operation, it made around 15 thousand euros in profit. Its owner is Stefan Laković. [32]

Atomic LLC provided services worth around 13 thousand euros to the People's Coalition. The founder and director of that company is Ivan Čojbašić, who is not known to be connected with political parties. [33]

The ZBCG coalition reported that video production and design services were provided exclusively by natural persons.

PES also hired natural persons, but also the company **PGS Agency**, which provided them with services worth around seven thousand euros. The owner of that company is Dušan Mandić, for whom the media previously claimed was a former employee of the National Security Agency (NSA). [34] Some 10 years ago, the company was in the public spotlight due to a disputed contract with the Ministry of the Interior of Montenegro (Moi) and the Police Administration, for which they procured software. [35]

It is interesting that the coalition of Democrats and URA spent only about 2.5 thousand euros for the design and production of videos. However, those expenses may have been shown within items that are not precisely explained in the report, but even in that case, their amount would be significantly lower than in most other electoral lists. [36] In addition, most of the videos of that coalition were so-called selfies, i.e. they were recorded by the leaders themselves and promoted on social media. However, this coalition made several videos, less demanding in terms of production, but no data on the expenses for their production can be found in their reports. They mention only very modest expenses for recording the conventions, which were later used for some of the videos.



Overview of videos of the coalition of Democrats and URA, for whose production no expenses were reported

[31] There is no information on connection with political parties.

[32] Without specific data on connection with political parties.

[33] See at: <https://www.imdb.com/name/nm5942486/>.

[34] Veljović plaćao lažne usluge - Vijesti, 19.04.2014 (there is no online version of the article).

[35] See at: <https://www.vijesti.me/vijesti/drustvo/79584/knezevic-starovlah-na-meti-tuzioca-ali-ne-da-fotelju-u-mup> ;

<https://www.cdm.me/hronika/pgs-ne-poznajemo-minica-i-veljovica/>.

[36] For example, this coalition reported expenses of five thousand euros for consulting services to the company "Black.rs". Since the information about the supplier, as well as the description of the cost, is not precise, it is possible that it is also about consultants for the production of video materials.

1.2.3. Analysis of the reported advertising expenses

Electoral lists reported spending a total of nearly 900,000 euros on advertising in the media. Almost half of that amount refers to advertisements on TV stations, and slightly more than a third to advertising in newspapers and on portals. Only 13% of reported advertising expenses related to social media.

Highest expenses in this category were reported by the coalition of Democrats and URA, nearly 250 thousand euros, and Europe Now with only a thousand euros less. In third place is the coalition gathered around DPS with around 145 thousand euros. They are followed by the ZBCG coalition with less than 65,000.

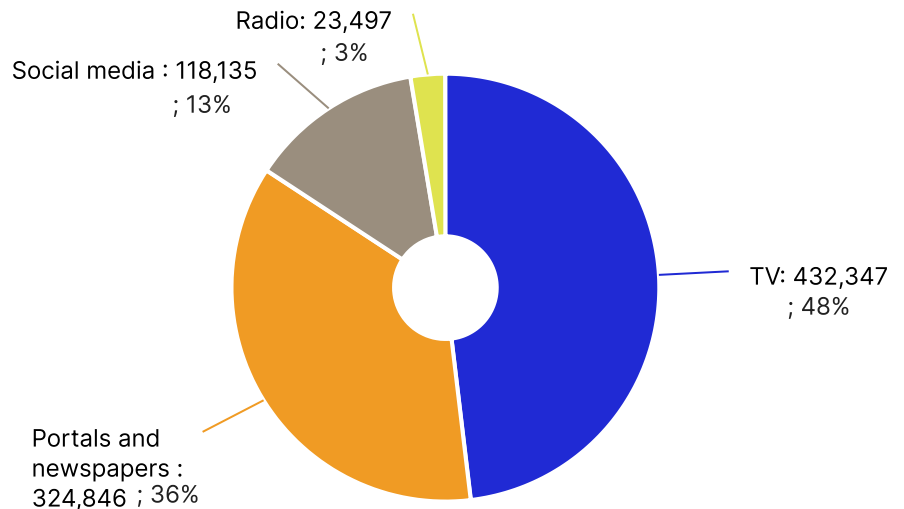


Chart 12: Reported advertising expenses in the media of all electoral lists

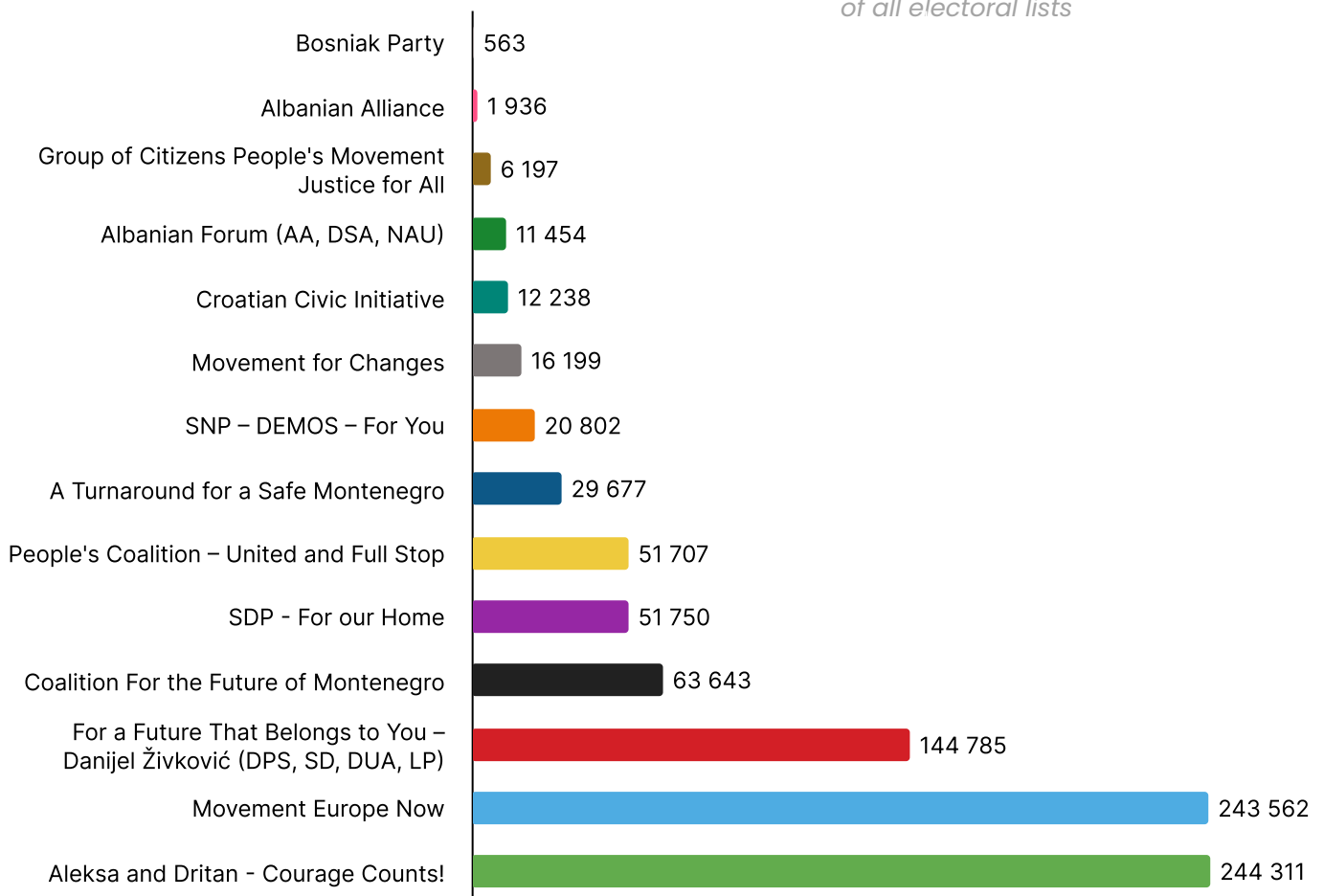
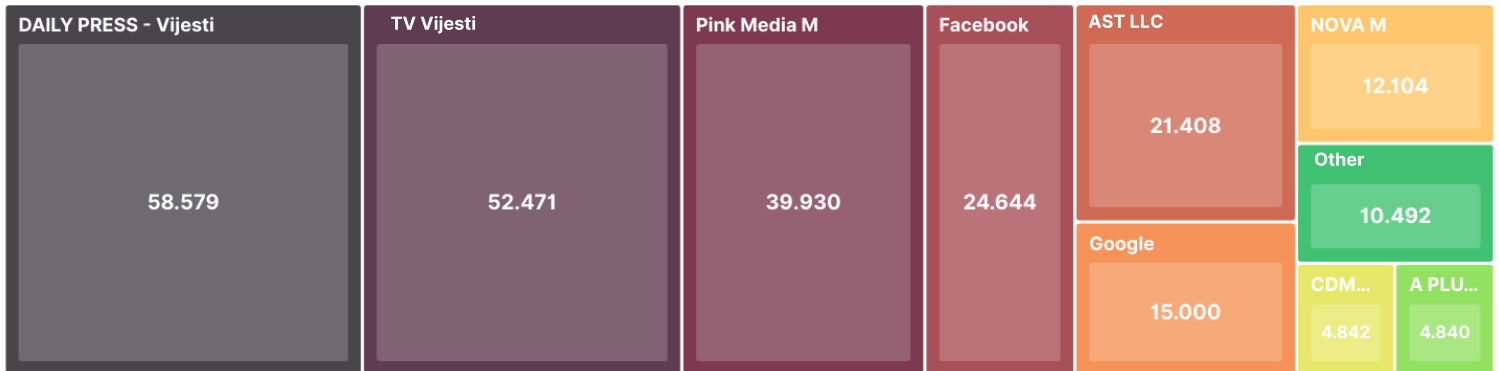


Chart 13: Reported expenses of advertising in the media by electoral lists

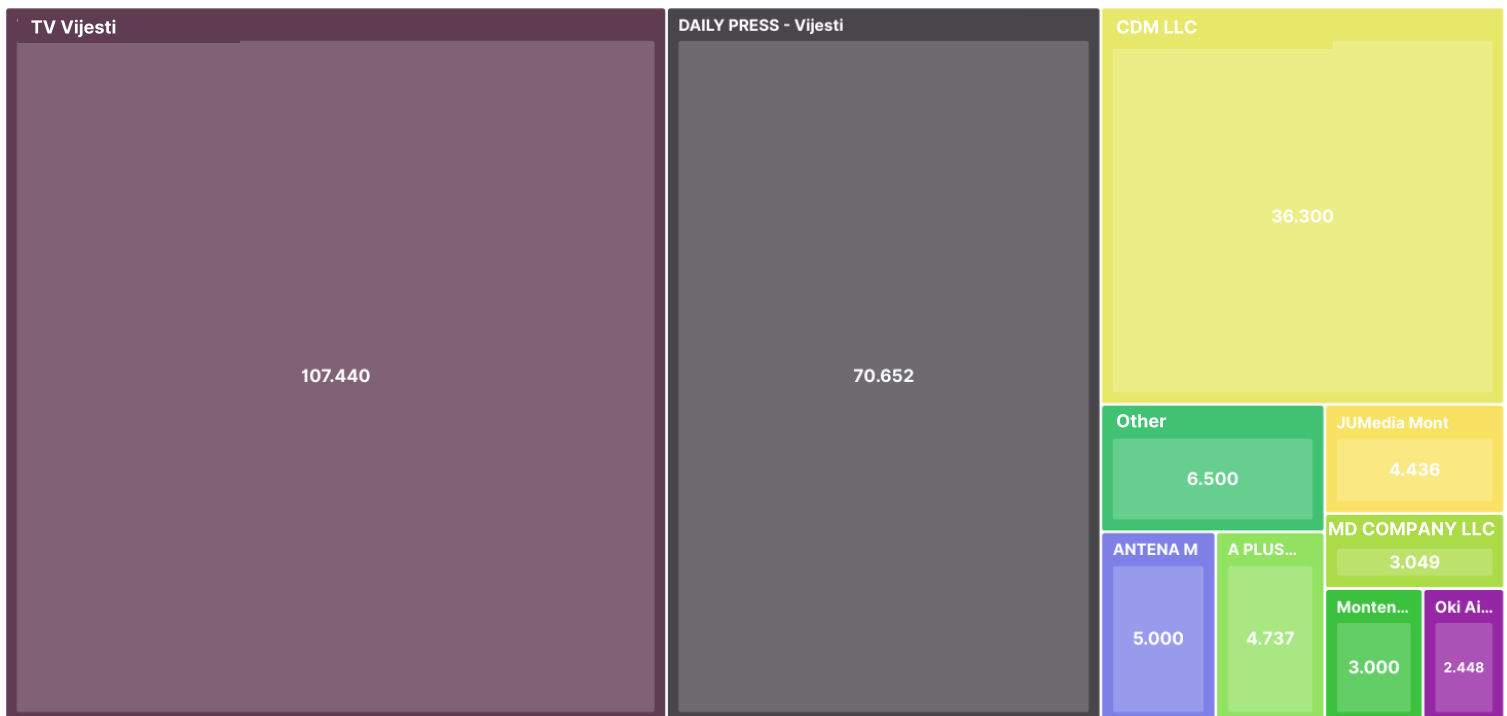
1.2.3.1. Structure of suppliers of the largest electoral lists

The coalition of Democrats and URA advertised the most on TV and in the newspaper/portal Vijesti, in second place is Pink M TV, followed by Prva TV and Nova M. This coalition reported that it had directly paid for advertising expenses on Facebook and Google.



Suppliers of the coalition of Democrats and URA for media advertising

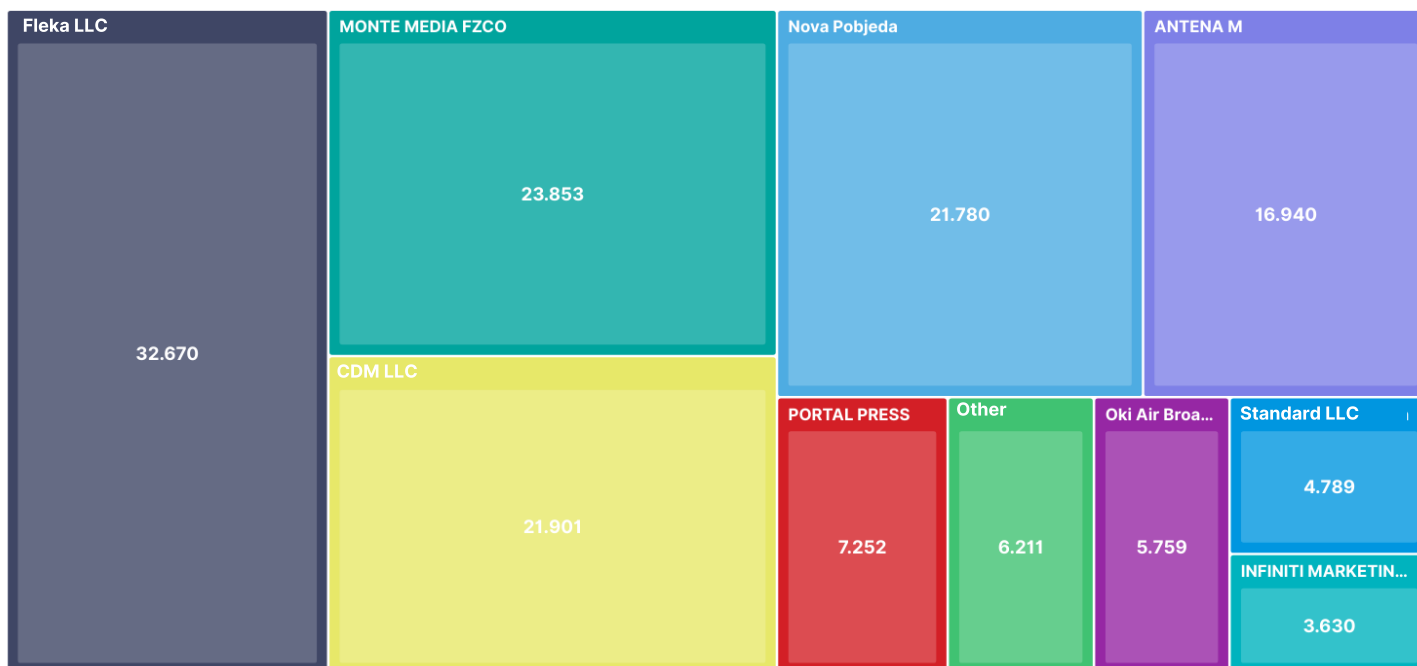
The Europe Now movement spent two-thirds of its advertising funds on TV and the newspaper/portal Vijesti, followed by the CDM portal, Antena M radio and portal, and A Plus TV.



Suppliers of Europe Now for media advertising

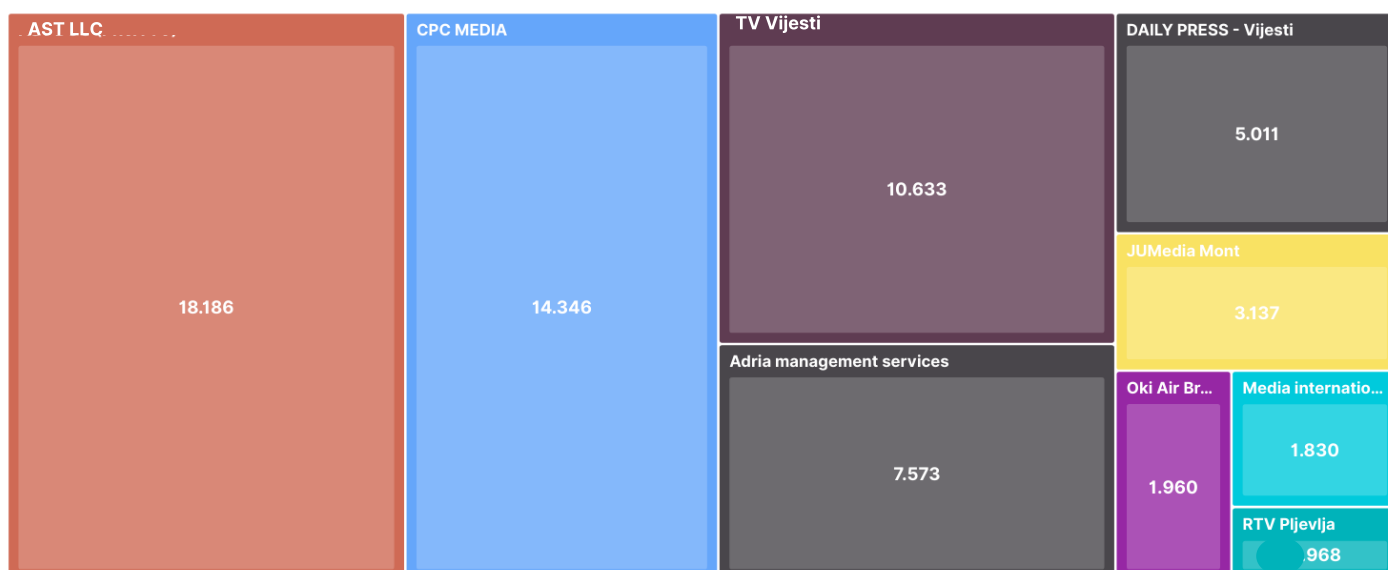
The coalition around DPS reported that its largest supplier for advertising expenses was the company Fleka LLC, on social media. In second place is Monte media FZCO, i.e. TV E, in third place is CDM portal, followed by the daily newspaper Nova pobjeda and the radio/portal Antena M.

The owners of the company Fleka from Cetinje are Miloš Milošević and Marko Lekić, for whom no direct connection with political structures can be established. This company concluded public procurement contracts during the term of office of the last three governments – Prime Ministers Duško Marković, Zdravko Krivokapić and Dritan Abazović.



Suppliers of the DPS' coalition for media advertising

ZBCG coalition reported highest advertising expenses on Prva TV, in second place was CPC Media, through which they bought advertising space on social media, and in third place was TV Vijesti. They are followed by TV Adria and the newspaper/portal Vijesti. The owner of the Kragujevac-based company "CPC Media" is a certain Aleksandar Marinić. [37]



Suppliers of the ZBCG coalition for media advertising

[37] See at: <https://rs.linkedin.com/in/aleksandar-marini%C4%87-63a63a1b9>.

Largest suppliers

Nearly half of the reported media advertising expenses of all electoral lists refer to TV Vijesti (237 thousand), as well as the portal and newspaper Vijesti (165 thousand).

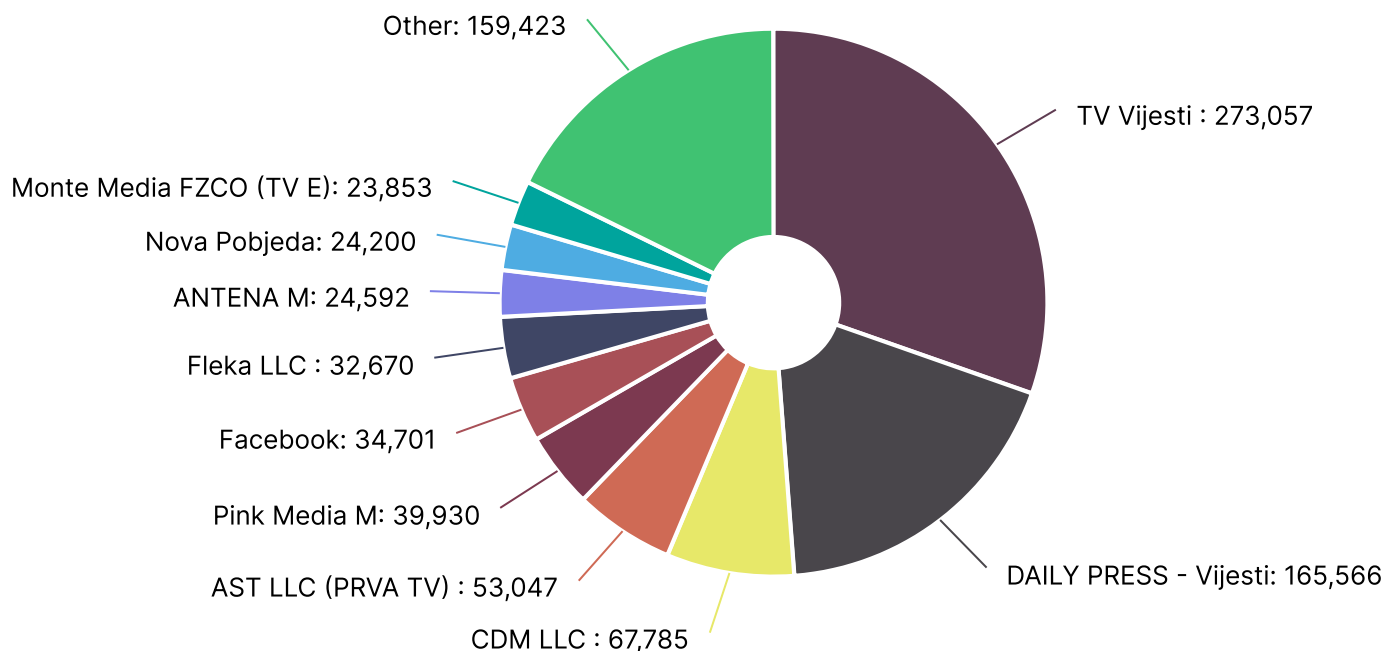
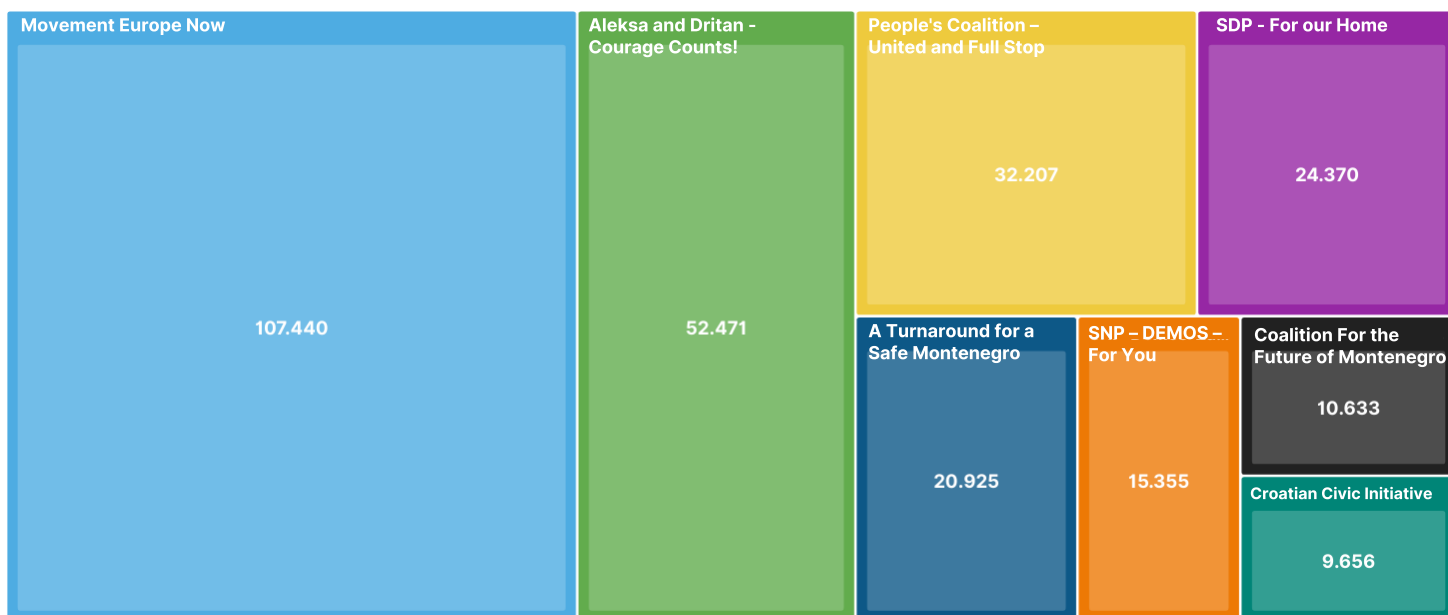
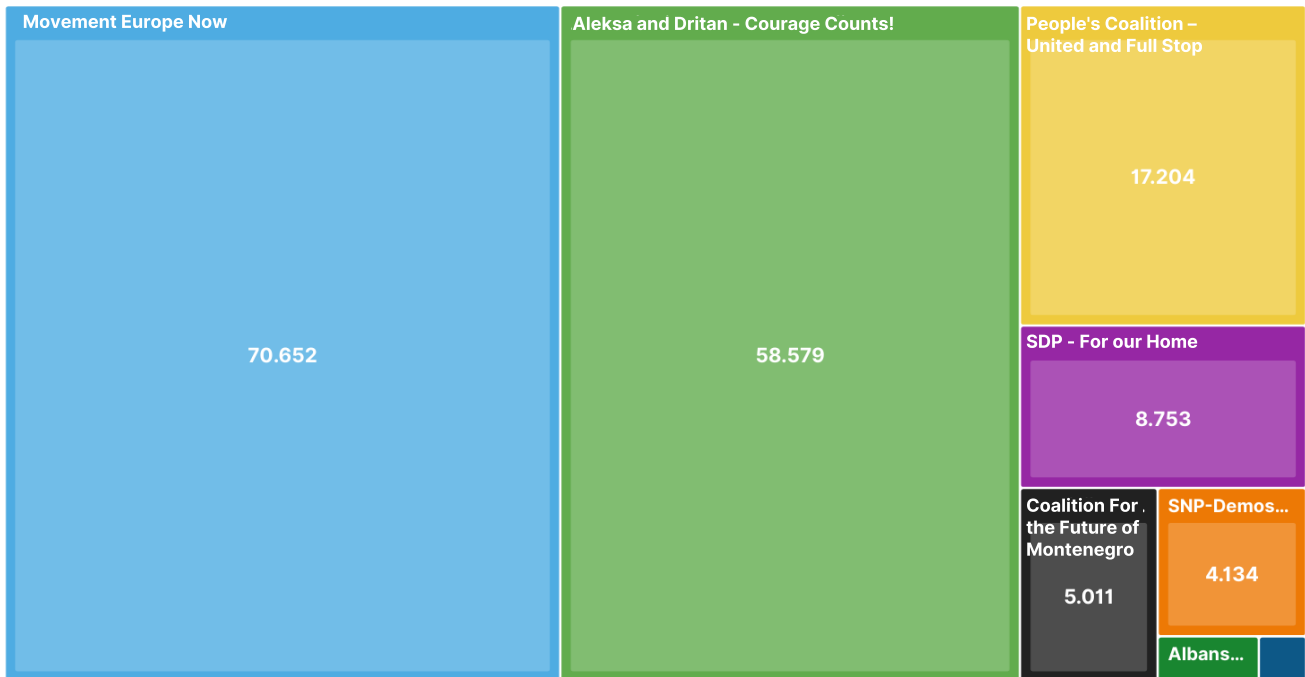


Chart 14: Largest suppliers of all electoral lists for media advertising expenses

Largest expenses for advertising in those media were reported by the movement Europe Now (nearly 180 thousand for all three media within Vijesti), in second place was the coalition of Democrats and URA (111 thousand), and in third place was the People's Coalition - United and Full Stop (nearly 50 thousand). It is followed by SDP (33 thousand), Turnaround (21 thousand), SNP and DEMOS (nearly 20 thousand) and ZBCG (15 thousand), HGI (less than 10 thousand) and the Albanian Forum (less than one thousand euros).

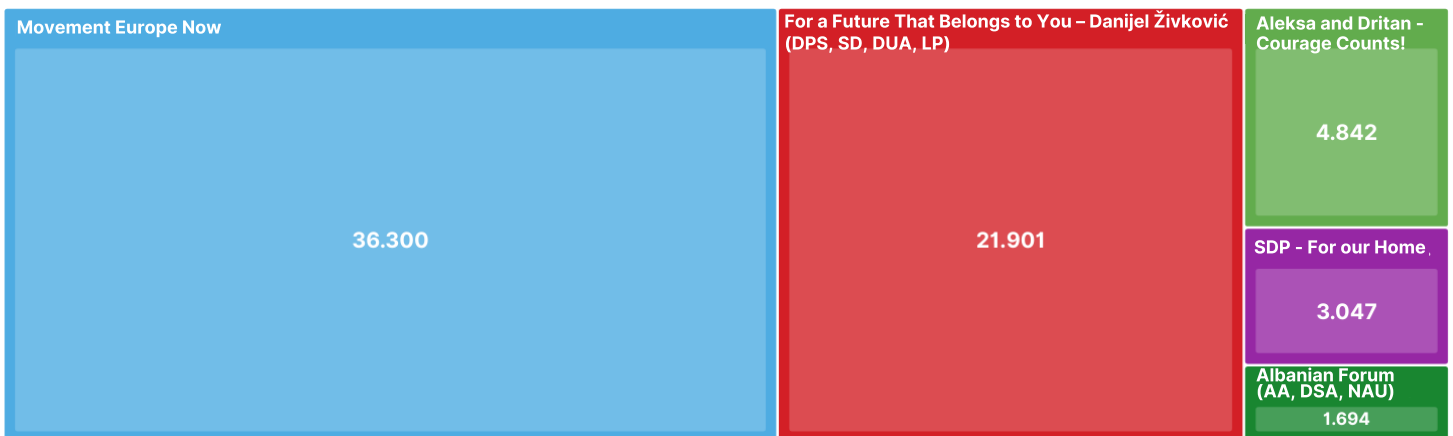


Electoral lists that reported advertising expenses on TV Vijesti



Electoral lists that reported advertising expenses on the portal and in the newspaper Vijesti

Among the largest suppliers is also CDM portal, where Europe Now (36 thousand) and the coalition around DPS (nearly 22 thousand) had most advertisements.



Electoral lists that reported advertising expenses on CDM portal

The coalition of Democrats and URA, ZBCG coalition and the Movement for Changes advertised on Prva TV.



Electoral lists that reported advertising expenses on Prva TV



Electoral lists that reported advertising expenses on Pink TV

Only one electoral list advertised on Pink M TV, namely the coalition of Democrats and URA. It is very interesting that the ZBCG coalition did not advertise on this TV station, while in previous election cycles, it streamed a significant part of its advertisements on TV Pink M.

Case study:

Europe Now concealed advertising expenses on TV Prva

The Europe Now movement stated in its official report that the expenses incurred by that political structure for advertising on TV Prva (AST LLC) amounted to zero euros.

However, the report of the Agency for Electronic Media and monitoring conducted by MANS show that Europe Now was advertised on TV Prva in duration of 1,368 seconds.

ZBCG coalition had a similar duration of advertisements (1,474 seconds) on Prva TV, which reported over 18,000 euros in expenses for advertising on that TV station.

Javni registri portal.antikorupcija.me:9343/aca

https://portal.antikorupcija.me:9343/acamPublic/izvestajDetails2.htm?parent=pretragalzvestaja&izvestajId=10497

SOCIJALNI_MEDIJI	JUMedia Mont	03.06.2023	19.06.2023	Plaćeno	0,00	03.06.2023 - 09.06.2023	1	1.592,61	
TV	AST DOO (PRVA TV)	03.06.2023	19.06.2023	Nije plaćeno	0,00	03.06.2023 - 09.06.2023	1	0,00	
SOCIJALNI_MEDIJI	ANTENA M	05.06.2023	19.06.2023	Plaćeno	0,00	05.06.2023 - 10.06.2023	1	5.000,00	
SOCIJALNI_MEDIJI	Creative Montenegro	05.06.2023	19.06.2023	Nije plaćeno	0,00	05.06.2023 - 10.06.2023	1	0,00	
TV	A PLUS MEDIA GROUP	05.06.2023	19.06.2023	Plaćeno	0,00	05.06.2023 - 10.06.2023	1	4.737,15	
OSTALO	PORTAL PRESS	03.06.2023	20.06.2023	Plaćeno	0,00	03.06.2023 - 10.06.2023	1	1.394,53	Portal Analitika pr tekstovi i baneri
BILBORDI	doo Bahus	01.06.2023	14.06.2023	Nije plaćeno	0,00	01.06.2023 - 01.06.2023	1	110,00	Stampa bilborda
OSTALO	S-Design	01.06.2023	16.06.2023	Plaćeno	0,00	01.06.2023 - 01.06.2023	1	15,00	Stampa postera
OSTALO	Biznis CG doo	08.06.2023	23.06.2023	Plaćeno	0,00	08.06.2023 - 11.06.2023	1	800,00	Baneri
OSTALO	NVU Volim Danilovgrad	02.06.2023	13.06.2023	Plaćeno	0,00	02.06.2023 - 09.06.2023	1	100,00	
TV	Televizija Vijesti	01.06.2023	16.06.2023	Nije plaćeno	0,00	01.06.2023 - 10.06.2023	1	10.950,50	Reportaze
OSTALO	DAILY PRESS - Vijesti	27.05.2023	20.06.2023	Nije plaćeno	0,00	27.05.2023 - 04.06.2023	1	3.630,00	PR tekstovi
OSTALO	DAILY PRESS - Vijesti	02.06.2023	20.06.2023	Nije plaćeno	0,00	02.06.2023 - 09.06.2023	1	9.680,00	Pojas na naslovnoj strani
BILBORDI	YU FAMILY	30.05.2023	21.06.2023	Plaćeno	0,00	01.06.2023 - 30.06.2023	1	1.050,00	
TV	Televizija Vijesti	01.06.2023	20.06.2023	Nije plaćeno	0,00	01.06.2023 - 10.06.2023	1	56.489,15	Emitovanje reklamnih spotova
Ukupni troškovi medijskog predstavljanja, oglasa i publikacija								305.799,98	

Excerpt from the Europe Now's report published on the APC's website, which states the expenses of advertising on Prva TV of 0 euros

Prilog: Medijsko predstavljanje

	Sum of AKTIVNOSTI	Sum of PREDSTAVLJANJE	Sum of OGLAŠAVANJE	Sum of TRAJANJE (SEC)
Prva TV				
Bošnjačka stranka				
besplatno	110	1.399	0	1.509
Da, mi možemo				
besplatno	42	0	0	42
Evropa sad				
besplatno	272	0	0	272
plaćeno	0	0	1.368	1.368
HGI				
besplatno	38	0	0	38
Hrabro se broji!				
besplatno	217	17.111	0	17.328
plaćeno	0	0	1.662	1.662
Narodna koalicija				
besplatno	117	1.088	0	1.205
Pokret za promjene				
besplatno	679	4.588	0	5.267
plaćeno	0	0	688	688
Preokret				
besplatno	0	3.710	0	3.710
SDP				
besplatno	134	10.143	0	10.277
SNP – DEMOS				
besplatno	156	1.576	0	1.732
Za budućnost Crne Gore				
besplatno	2.830	40.656	0	43.486
plaćeno	0	0	1.474	1.474
Zajedno!				
besplatno	363	1.685	0	2.048
Prva TV Total	4.958	81.956	5.192	92.106
TV Vijesti				
Albanski forum				
besplatno	38	0	0	38
Bošnjačka stranka				
besplatno	292	0	0	292
Da, mi možemo				
besplatno	379	0	0	379
plaćeno	0	0	193	193
Evropa sad				
besplatno	923	11.441	0	12.364
plaćeno	0	0	4.779	4.779
HGI				

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*Excerpt from the report of the Agency for Electronic Media,
which states that Europe Now was advertised on TV Prva in duration of 1,368 seconds*

1.2.3.2. Social media advertising

Total expenses of social media advertising reported by all electoral lists amount to 118 thousand euros.

Highest expenses were reported by the coalition of Democrats and URA, over 40 thousand euros, in second place is coalition gathered around DPS with 36 thousand, in third place ZBCG with around 14 thousand euros, and SDP with less than nine thousand.

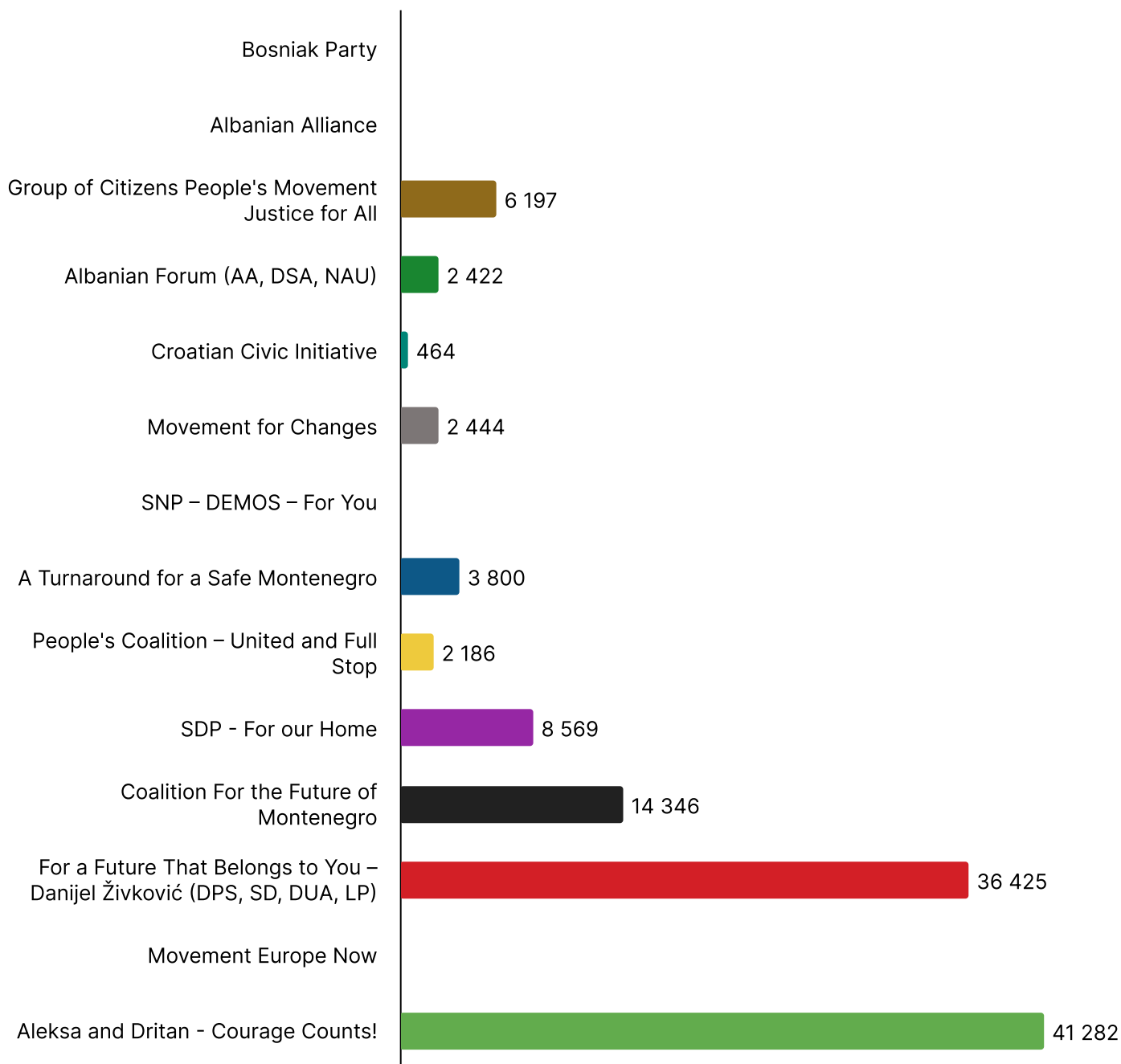


Chart 15: Reported expenses of social media advertising

Case study:

Europe Now hid advertising expenses on Facebook

The Europe Movement did not report a single cent spent on social media advertising, although monitoring data show that the coalition must have had significant advertising expenses.

Facebook enables limited tracking of spending on political ads through its “Ad Library” tool, however, this information is only available for a limited period and there is no detailed search available in the EU countries.

However, from those limited data, it can be seen that **Europe Now spent over 4.3 thousand euros on advertising on Facebook in the period from May 8 to June 6 alone.** Namely, according to data from the Ad Library, for that period, 2,370 euros was spent on behalf of the leader Milojko Spajić, and an additional 1,986 euros was spent on behalf of the Europe Now movement.

Data on paid advertising on Google and You Tube are not available in Montenegro, thus, it is not possible to determine the level of these expenses.

Case study:

Advertising on social media during the election silence

Data from the monitoring show that electoral lists advertised on social media even during the election silence.

This issue is not regulated by law, while advertising in commercial media is prohibited during that period.

Some electoral lists paid additional funds for advertising on social network Facebook during the election silence.

For example, the electoral list of Democrats and URA had several accounts for advertising on Facebook after the beginning of the election silence, and some of them were issued on the election day itself. Other electoral lists had a similar practice.



Receipt for PARLAMENTARNI 2023

Account ID: 664258451889066

Invoice/payment date
13 Jun 2023, 06:46

Payment method
MasterCard · 2594
Reference number: FYD52SKFC2

Transaction ID
6363961817049757-12516238

Product type
Meta ads

Paid

€727.52 EUR

Your previous payment for these ad costs failed.

Campaigns

GRADIMO ZAJEDNICKU KUCU - 100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€16.12
GRADIMO ZAJEDNICKU KUCU - 100	4,144 Impressions	€16.12
UPALIMO LUCU - 100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€20.72
UPALIMO LUCU - 100	5,906 Impressions	€20.72
ALBUM DG - -100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€19.06
ALBUM DG - -100	10,785 Impressions	€19.06
ZAKLINJEM SE! VIDEO -100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€19.71
ZAKLINJEM SE! VIDEO -100	9,571 Impressions	€19.71
PG 3 MIN - 100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€22.46
PG 3 MIN - 100	7,450 Impressions	€22.46
REELS PG SKUP - 100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€25.36
REELS PG SKUP - 100	11,971 Impressions	€25.36
ZETA TUZI - 100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€19.60
ZETA TUZI - 100	9,269 Impressions	€19.60
ALBUM TUZI - 100 From 10 Jun 2023, 00:00 to 11 Jun 2023, 23:59		€24.25

Example of an invoice for advertising on Facebook during the election silence

1.2.4. Analysis of the reported expenses of activists

All electoral lists reported nearly 380 thousand euros in expenses of activists, of which 97% refers to payment of per-diems, and the rest to related taxes and contributions.

Taxes on per-diems were reported only by some electoral lists (ZBCG, Albanian Alliance, Movement for Changes, SDP and Turnaround). **DPS paid over 97,000 euros to its activists, but did not report the tax costs on those per diems.**

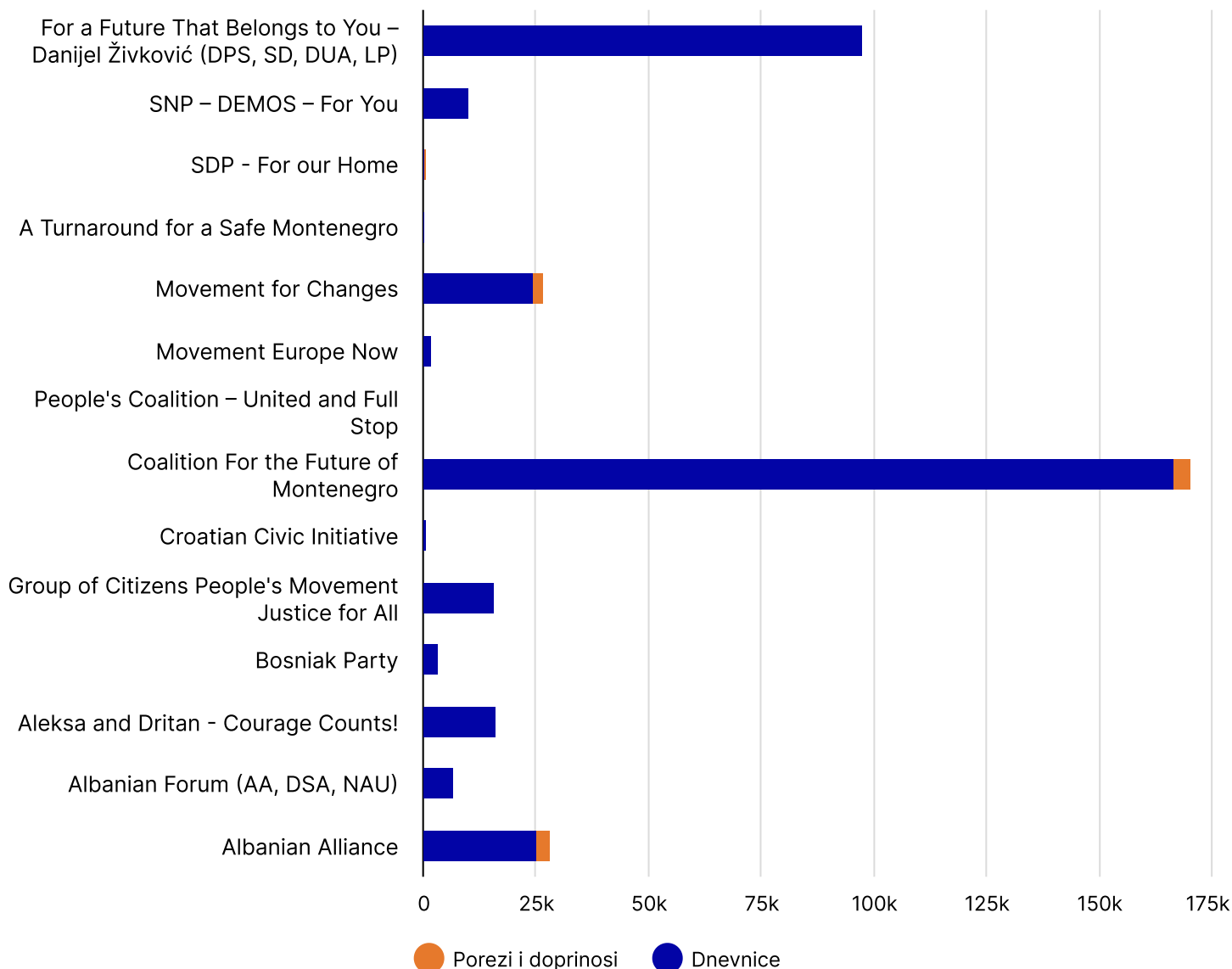


Chart 16: Types of expenses of activists by electoral lists

The ZBCG coalition had the highest payments of per diems out of all electoral lists (166 thousand euros), in second place was DPS with 97 thousand, followed by the Albanian Alliance with 25 thousand, the Movement for Changes with 24 thousand and the coalition of Democrats and URA with 16 thousand.

Europe Now reported only two thousand euros of expenses of per diems in the entire campaign, HGI, Turnaround and SDP reported symbolic amounts, while the People's Coalition did not report a single cent of expenses of activists.

1.2.5. Analysis of other reported expenses

All electoral lists reported nearly 210 thousand euros of other expenses, which are mostly related to food, beverages and accommodation (56%), various consultants (37%) and other expenses (7%).

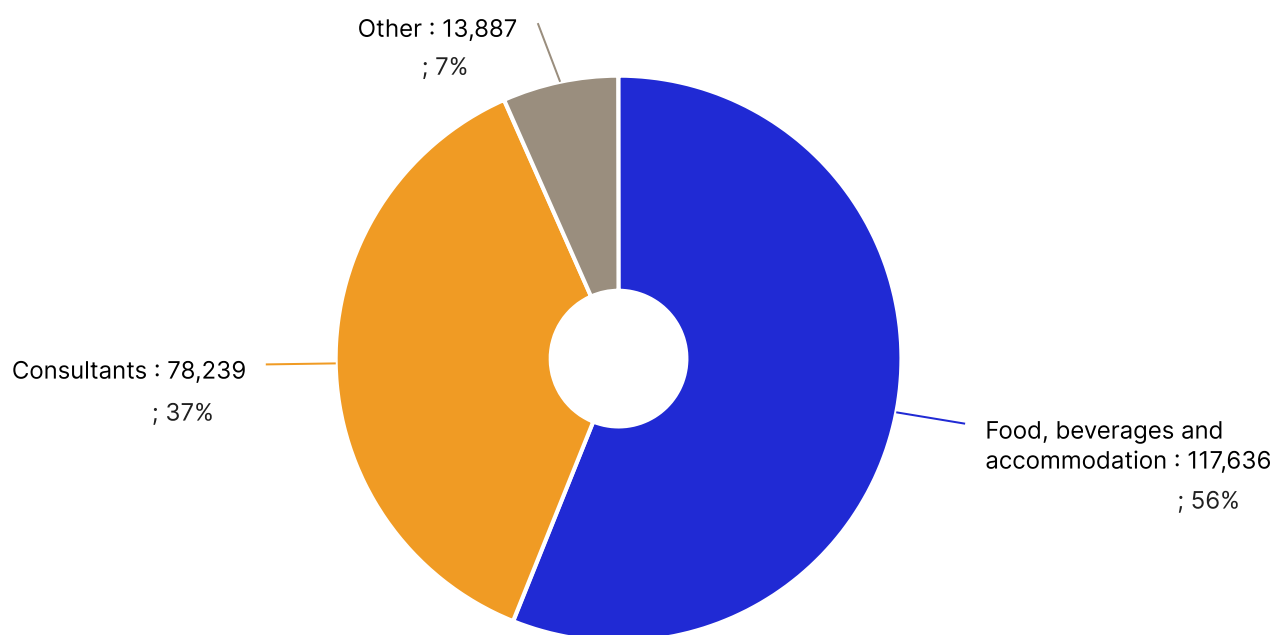


Chart 17: Types of other reported campaign expenses

Largest total other expenses were reported by the coalition around DPS, and they mainly refer to consultants (almost 56 thousand euros), primarily to the company DAA Montenegro from Podgorica. It is a marketing agency whose owners are Nikola Radonjić, Srđan Tomović and Igor Marić, and for these persons, no connection with the coalition gathered around the DPS can be established. **It is interesting that the DPS reported expenses for food, beverages and accommodation of about 11 thousand euros, which is significantly less than the expenses of the SDP, a much smaller party or, for example, the Bosniak Party, which did not have a campaign in all towns.**

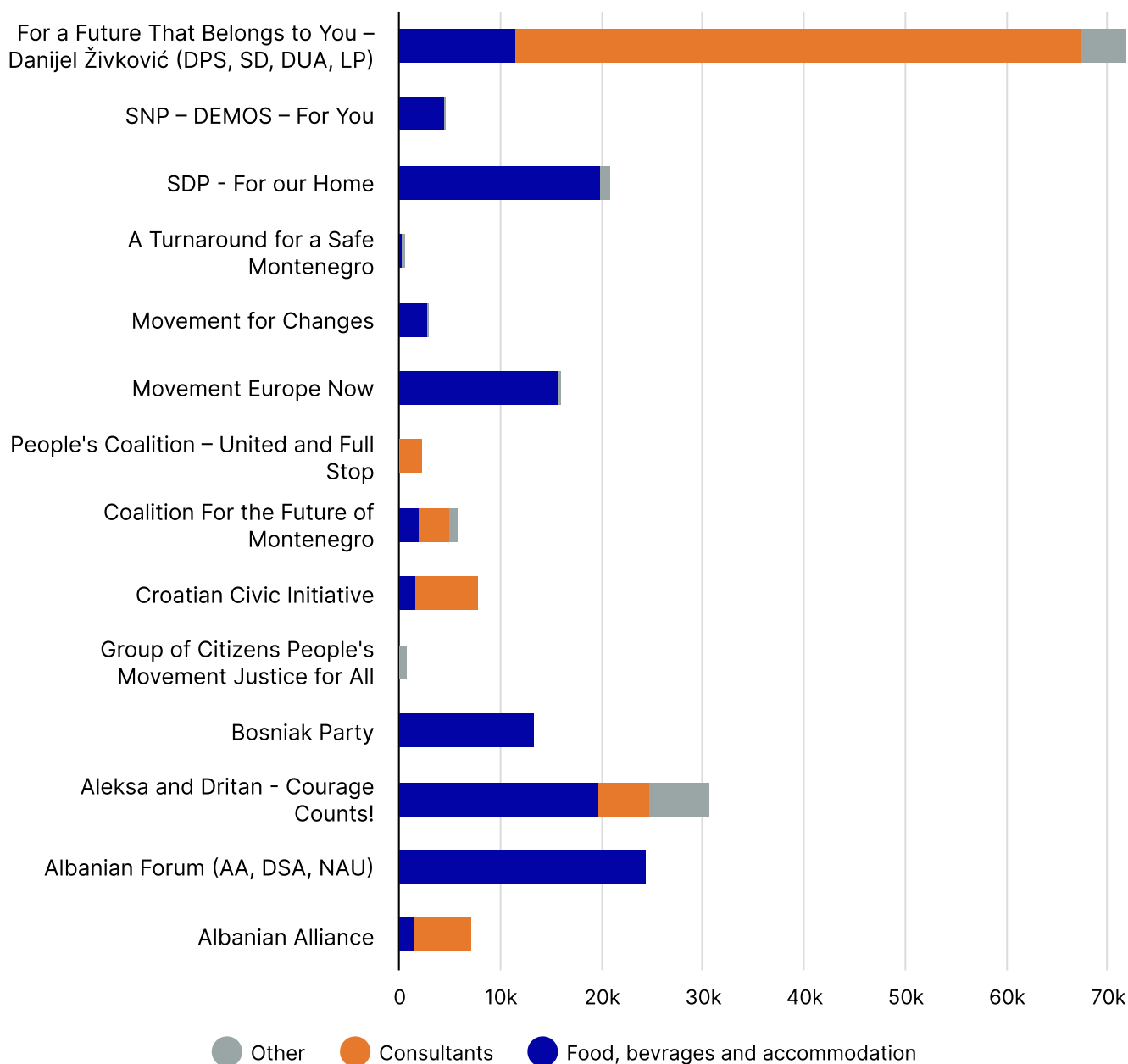


Chart 18: Types of other reported expenses by electoral lists

In second place is the coalition of Democrats and URA, which had total other expenses worth about 30 thousand, of which almost 20 thousand for food, beverages and accommodation, six for other expenses, and five for consultants, the company "Black Arch & Design" from Kruševac, the Republic of Serbia, headed by a certain Marko Đorić. [38]

The reported expenses of the Albanian Forum in this category were less than 25 thousand, and they related to food, beverages and accommodation. Over 15 thousand refers to the supplier Vikriant LLC, whose owner is Viktor Dukić, and that company runs the "Oasis" hotel in Tuzi. [39] A significant part refers to debts owed to the Iliria company (almost seven thousand), whose owner is Marko Đeljošević. There is no information about the connection of the owners of these companies with political parties.

[38] See at: https://rs.linkedin.com/in/marko-djoric-869a08200?trk=people-guest_people_search-card.
 [39] See at: <https://www.hotel oasis.me/>; Official email address of the company is: info@hotel oasis.me.

SDP reported about 21 thousand euros, and most of the expenses relate to food, beverages and accommodation. The party ignores the request for free access to information that related to all the expenses of their campaign, which is why the complaint and request for urgent action were submitted. [40]

It is interesting that this list reported that it had paid over 18,000 euros in representation expenses to the company Ad Mind. That company is owned by Rade Milošević, the former state secretary of the Ministry of the Interior, who is officially under investigation for tobacco smuggling. The company was taken over in the winter of 2021 by his sister (according to media information) – Dragica Milošević, after Milošević was appointed to public office. [41] On another note, it is a company that, among other things, offers advertising services via SMS.

The Europe Now movement reported around 16,000 euros in other expenses, most of which relate to food, beverages and accommodation. Their largest supplier for these services is the company Stadio, which is owned by the companies "Đ&M", "Me Gusta", and "Inter Nos 2000" – whose owner is Radojica Magovčević, who was suspected of creating a criminal organization and evasion of taxes and contributions a few years ago. [42]

The Bosniak Party reported about 13,000 euros of other expenses, which relate exclusively to the representation and accommodation, and it concerns several different suppliers, owners of restaurants and hotels, none of which dominates.

HGI reported almost eight, and the Albanian Alliance over seven thousand euros of consulting and representation expenses.

The ZBCG coalition reported **less than six thousand euros of other expenses, of which less than two thousand related to accommodation, beverages and food, thus, these expenses are clearly underestimated.** That coalition reported that it has hired the Dar company as a consultant for around three thousand euros. It is an advertising agency whose founder and director is Dragomir Alorić who, according to the media, was elected to the Serb National Council of Montenegro a few years ago. Members of that Council include other individuals from the management structure of "Srpska kuća", which donated to the ZBCG campaign. [43]

SNP reported less than five thousand euros, of which 3.5 thousand for the services of the company SP21, which owns the restaurant "Đedovina" on the outskirts of Podgorica.

[40] Free Access to Information request of NGO MANS no. 145311 from 17.07.2023.

[41] See at: <https://www.cdm.me/ekonomija/rade-milosevic-za-devet-mjeseci-ustedio-65-000-eura/>.

[42] See at: <https://old.dan.co.me/?nivo=3&rubrika=Hronika&clanak=786943&datum=2021-04-04>.

[43] Izabrano 17 članova Srpskog nacionalnog savjeta Crne Gore, Pobjeda, 12.02.2018.

1.2.6. Analysis of the reported expenses of rallies

Total reported expenses of rallies were over 200 thousand euros, and the largest part was related to the rental of equipment (170 thousand), while in second place was the space rental (28 thousand).

The coalition around DPS reported highest expenses of organizing rallies, around 125 thousand euros, of which 96% refers to the rental of equipment, almost exclusively from the company BBA Agregati (120,000 euros). 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, business partner of Ana Đukanović, sister of the president of DPS, Milo Đukanović, in the business related to the privatization of Telekom.

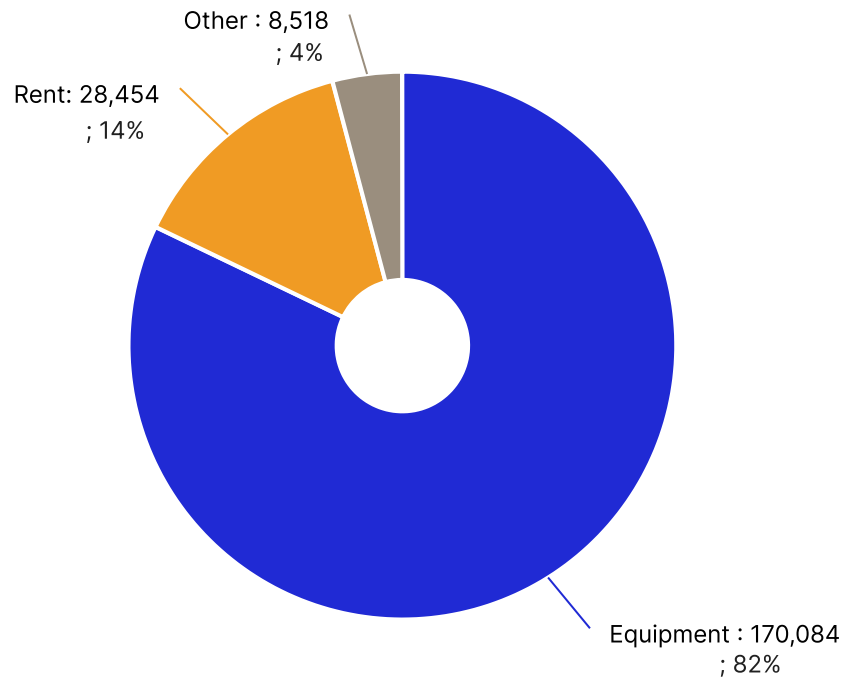


Chart 19: Types of reported expenses of rallies

The coalition of Democrats and URA is in second place in terms of the reported expenses of the rallies, with around 20 thousand euros, of which around two-thirds is related to the rental of equipment, and the rest mainly to the space rental. Judging by the report and data analysis, the most money was spent on the coalition's final rally in Podgorica. [44]

Largest suppliers of that coalition were PG Sound (almost nine thousand) and Takt produkcija (around two thousand) for equipment, and the hotel Hilton for space rental (3.2 thousand euros). The owner of "Takt Produkcija" is Predrag Milić, and no information about possible connections with parties can be found for him and the company. As for the company "PG Sound", it, like the company "PGS Agency", is owned by Dušan Mandić, a former NSA employee (according to the media), who owns 33%, while the other two co-owners are Obren Tošić and Milan Todorovic. Hotel Hilton, i.e. the company "Hotel Crna Gora" that manages it, is majority-owned by JSC "UTIP Crna Gora", a former state-owned company that was acquired in a controversial privatization by Žarko Burić, a businessman close to the former government led by DPS. [45]

In third place is the Bosniak party, which reported the expenses of the rallies of nearly 12 thousand euros, of which almost nine were for renting equipment, and three for space rental. They rented the equipment exclusively from the Kmet sound company. That company is owned by a certain Bisera Kujević, and was founded in June 2022, and by the end of last year it had one euro of revenue and one euro of expenses.

[44] See at: <https://www.youtube.com/watch?v=EYKChujA7A>.

[45] See at: <https://www.mans.co.me/tag/zarko-buric/>.

The Europe Now movement reported about 11 thousand euros in the expenses of rallies, of which about eight thousand refers to the rental of equipment mainly from the company PG Sound, and the rest to the space rental. Analysing the reported expenses and available materials showed that this movement did not excessively use audio-visual effects at its rallies, thus, the rally in Berane is one of the few where a video beam was visible, while the report states that a company "Idas" was paid the amount of 1,210 euros for their service. [46]

ZBCG coalition reported only about 8.5 thousand euros in the expenses of rallies, of which about seven related to the rental of equipment from the company Takt produkcija, and the rest to the space rental. In the report of this coalition, the expenses of the rally in Pljevlja, where audio-visual equipment was evidently used, are not recorded. [47] On the other hand, the expense of renting the hall, but not the equipment, was reported for the rally in Tivat. [48]

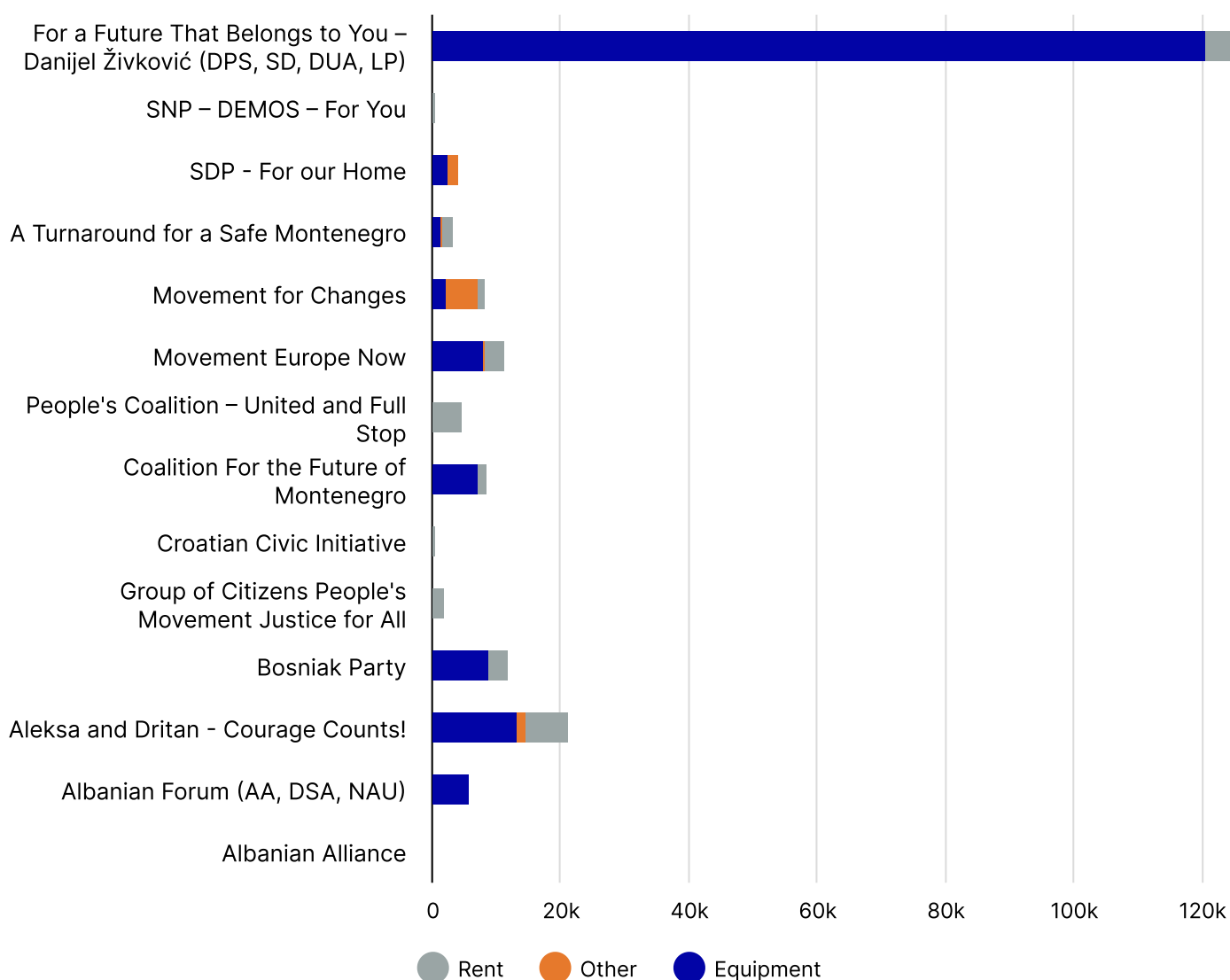


Chart 20: Types of reported expenses of rallies by electoral lists

The Albanian Alliance did not report the expenses of the rallies at all, while HGI, SNP and Justice for All reported symbolic amounts for all of them.

[46] See at: <https://www.youtube.com/watch?v=WpJCJNS3-m8>.

[47] See at: <https://www.youtube.com/watch?v=IXSRz-Gfovc>.

[48] See at: https://www.youtube.com/watch?v=XMaq_2IWslU.

1.2.7. Analysis of the reported transportation expenses

All electoral lists reported a total of 65 thousand euros in transportation expenses, and most of these expenses refer to the transportation rental expenses (73%), while fuel accounts for about 16%, and travel expenses for activists about 11%.

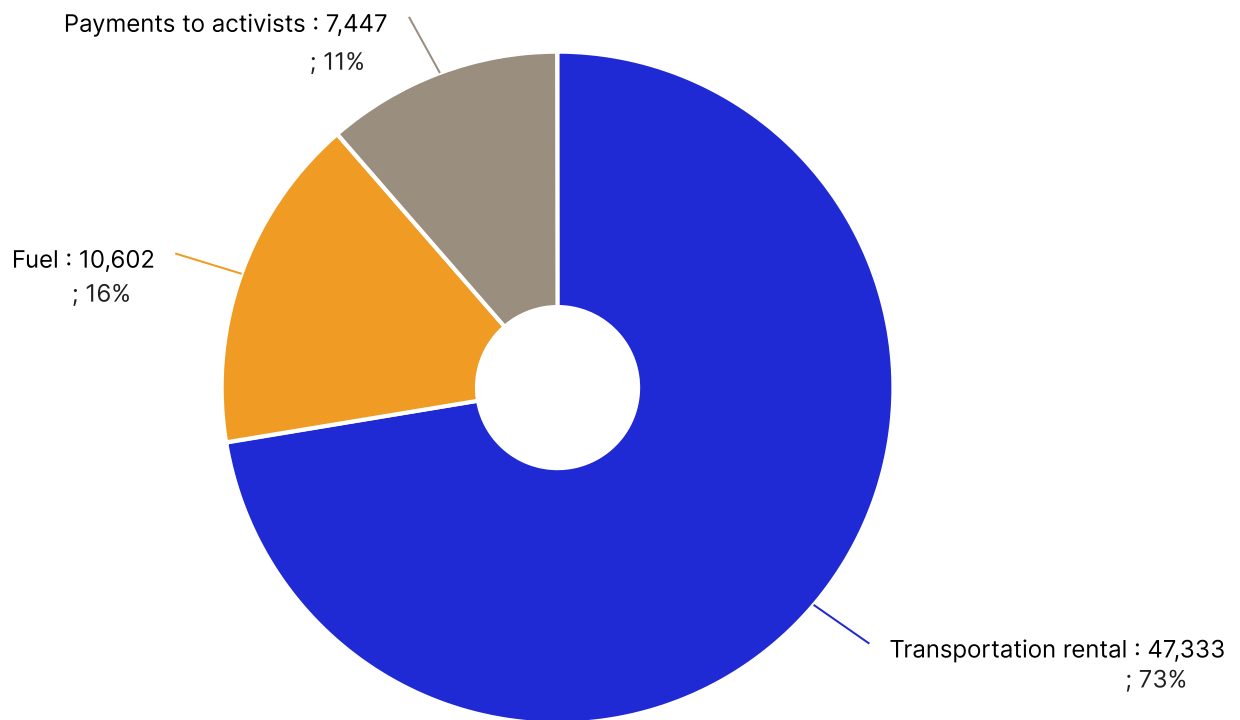


Chart 21: Reported transportation expenses by types

Highest transportation expenses were reported by the coalition gathered around the DPS, 17 thousand euros, and all these expenses refer to the rental of transportation. Their largest supplier was the travel agency Mappamondo LLC from Podgorica which, according to official reports, provided them with services worth almost 15 thousand euros. The owners of that company are Dejan Božović and Damir Fetahović, son of Jusuf Fetahović, the former director of Telekom when that telecommunications company was still state-owned. [49] Judging by the email address, this company manages the rental car agency "Nava". [50]

It is very indicative that DPS did not report the fuel expenses for the transportation of its activists in the field, or of its officials to the numerous rallies where they spoke, but only the travel agency services.

[49] Pare otišle na rupe u budžetu, a stranci dobili monopol, Vijesti, 11.01.2012.

[50] See at: <https://www.navarentacar.com/>; navarentacar@gmail.com is the official email address of this company.

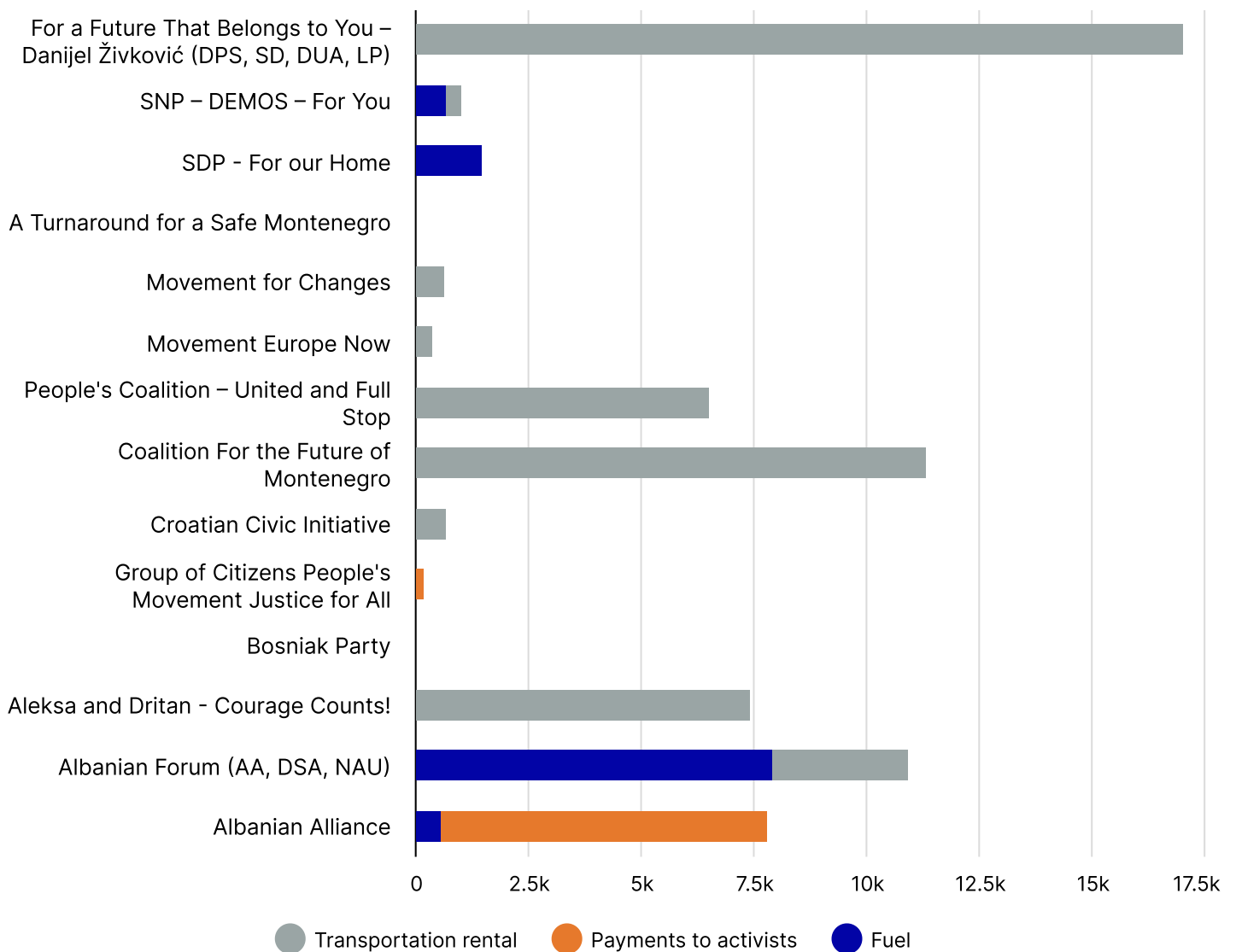


Chart 22: Types of transportation expenses by electoral lists

ZBCG coalition reported transportation expenses of 11,000 euros, which are also exclusively related to the rental of transportation. Their largest supplier was the company "Zeković prevoz" from Nikšić. The owner of that transport company, Zdravko Zeković, is not known to the general public as someone close to political parties, more precisely, no additional information can be found about him. [51]

ZBCG also did not report fuel expenses or payments to activists on that basis, but only the services of transport companies.

The Albanian Forum reported 11,000 euros in transportation expenses, of which almost 8,000 relate to fuel purchased exclusively from Junčaj Petrol, and around 3,000 to renting transportation from MCN LLC only. The owner of the company "Junčaj Petrol Commerce" is a certain Ljuiđ Junčaj, for whom no additional information can be found. [52] The media previously associated a person of that name with a member of the coalition, the Democratic Union of Albanians (DUA), but it cannot be claimed that it is the same person. [53] The company "MCN" is owned by Nikola Memčević and deals with car rental services. [54]

[51] See at: https://www.facebook.com/zekovic.prevoz.3/?paipv=0&eav=AfZNwMzgZ2dyqhr0d46ko9OY8oCTPlaup6cQMVEKXRkSBGIxFCuJNxWSLbaTR6Fhc4&_rdr.
 [52] There are several persons with the same first and last name.
 [53] See at: <https://mne.ul-info.com/noya-vlada-zenka-ministar-za-ljudska-i-manjinska-prava/>.
 [54] See at: <https://www.facebook.com/mcnrentacar/>.

The Albanian Alliance reported 7.8 thousand in transportation expenses, almost exclusively for reimbursement of those expenses to activists, and only about 500 euros was spent on fuel purchased from "Jugopetrol".

The coalition of Democrats and URA reported nearly 7.5 thousand in transportation expenses related only to rental, mainly from the companies "Božur" (3.2 thousand euros) and "Lemid" (two thousand). The owner of the company "Božur", one of the largest bus companies in the country, is Radivoje Kovačević. [55] As for the company "Lemid", it is owned by a certain Mladen Lečić, without any additional information about the connection with the parties.

Thus, the coalition of Democrats and URA did not report fuel expenses or payments to activists on that basis, but only the services of transport companies.

Case study:

PES spent less than 400 euros for the entire campaign

PES reported a remarkable 373 euros in transportation expenses, and only for the observers on the election day, even though the party organized rallies in all municipalities where its high-ranking officials spoke.

In case they used two cars with an average tank volume of 50l, and that one car consumed an average of 7l of fuel per 100 km, and that the average price of fuel in that period was 1.5€, for the transportation of eight activists to Nikšić and back, they had to spend 21 euros. [56]

Using this calculation, for transporting eight activists to Žabljak in two vehicles, they would spend about 50 euros on fuel alone. [57] A similar calculation would be for going to the rally in Herceg Novi. [58]

In addition, the officials of this party also visited the municipalities farthest from Podgorica – Plav, Andrijevića, Rožaje, thus, it is clear that they had expenses for the transportation of their members in the amount of at least several hundred euros, and that provided that they only used two vehicles for transportation of eight activists/officials, and it is clear from the videos from the rallies that there were more of them, which was not stated in the report on the expenses of the election campaign.

2 vehicles 8 activists

€ 373 €

🚗 248 L/5 tank

🚗 7 L/100 km

🚗 PG-Žabljak-PG 52€

🚗 PG-Herceg Novi-PG 48€

🚗 PG-Rožaje-PG 55€

[55] See at: <http://www.bozur.net/me/>.

[56] Pre-election rally in Nikšić: <https://www.youtube.com/watch?v=vhmRYepM6GQ>.

[57] Pre-election rally in Žabljak: <https://www.youtube.com/watch?v=ZO3mxsOaiFA>.

[58] Pre-election rally in Herceg Novi: <https://www.youtube.com/watch?v=PAYeiQufwMA>.

1.2.8. Analysis of the reported poll expenses

The expenses of public opinion polls were reported by only three electoral lists: the Bosniak Party about 11 thousand euros, the Albanian Forum about eight thousand, and DPS about seven thousand euros.

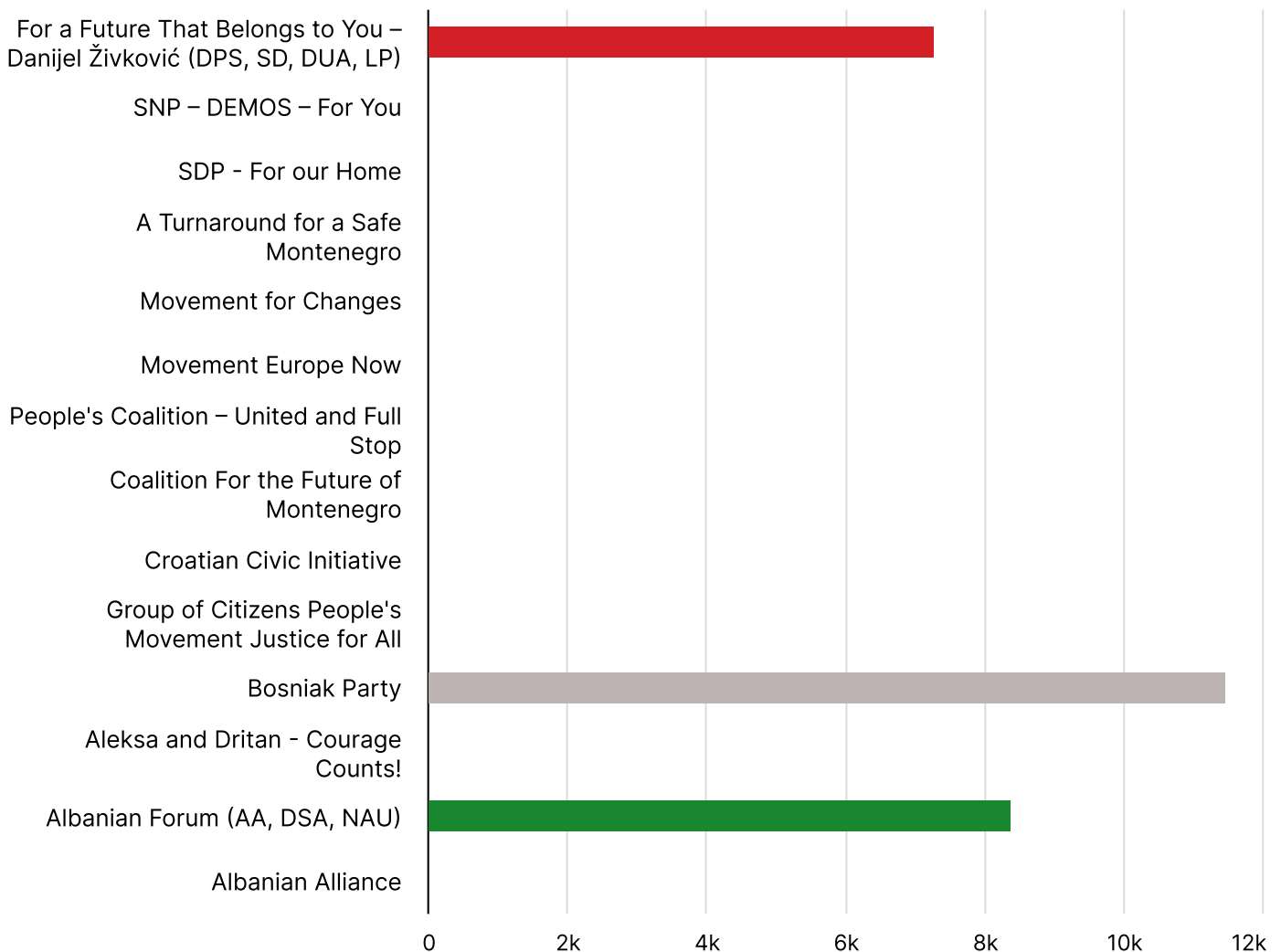


Chart 23: Reported expenses of public opinion polls by electoral lists

It is very difficult to imagine that during the election campaign, large electoral lists such as Europe Now, ZBCG and the coalition of Democrats and URA did not conduct public opinion polls at all, hence, there is a great possibility that these expenses were hidden.

1.2.9. Analysis of the reported administrative expenses

Most electoral lists reported negligible administrative expenses, mostly related to bank commissions. Electoral lists did not report the expenses of using mobile phones or the Internet, let alone electricity and other overhead expenses in the headquarters that were formed for the election purposes.

Of all electoral lists, only the Albanian Alliance reported the expenses of office supplies, and only SDP reported the expenses of electricity.

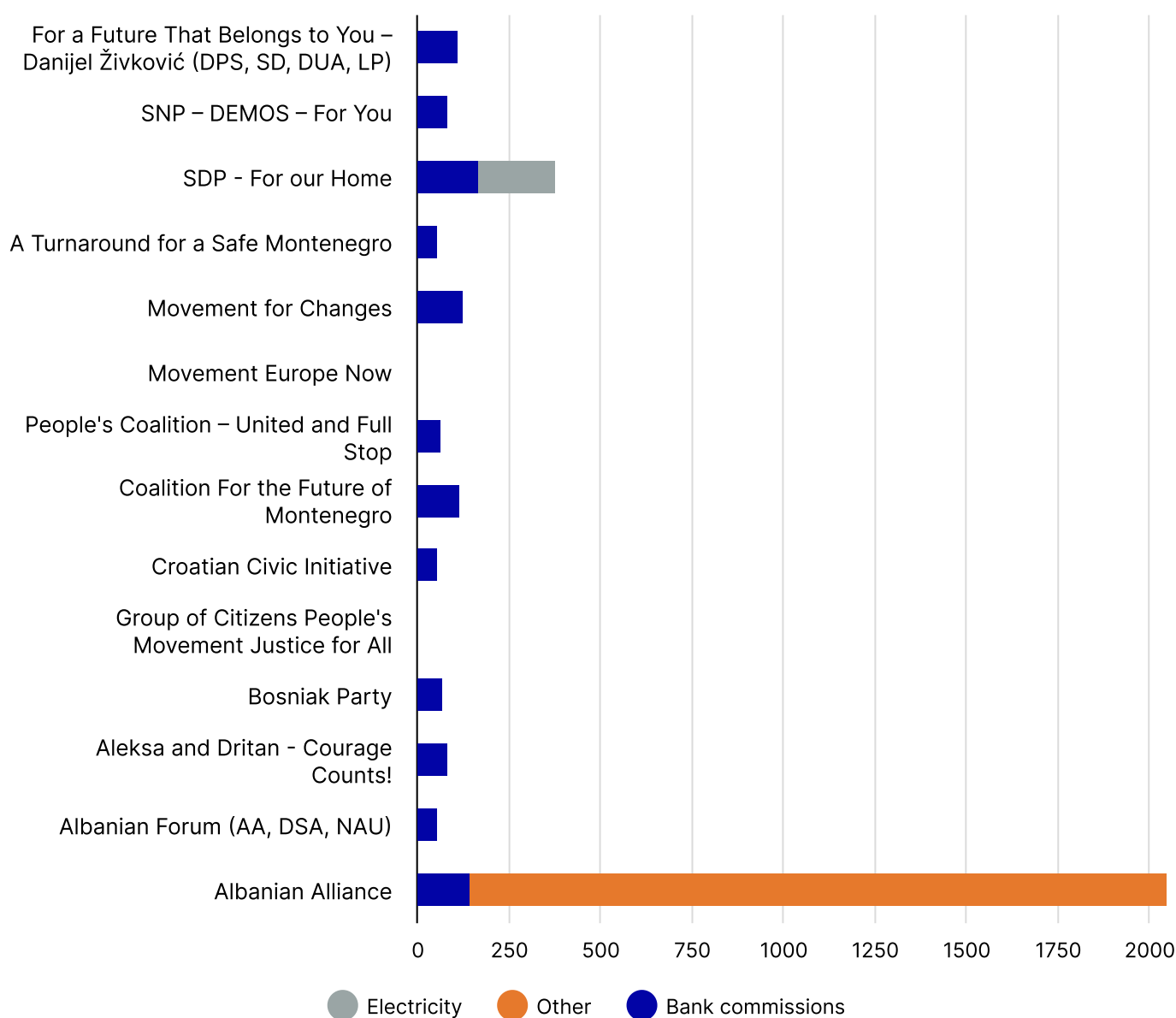


Chart 24: Reported administrative expenses by electoral lists

1.3. Debts



The official reports of the electoral lists show that the total reported revenues in the campaign for the parliamentary elections were around one million euros, and the official expenses were around three million euros.

It cannot be determined from the official reports whether the electoral lists paid about two million i.e. two thirds of the reported expenses of the election campaigns, due to shortcomings of legal provisions.

According to the law, electoral lists have a deadline of two months to pay campaign expenses from a separate election account after submitting reports on its financing. Namely, the parties are obliged to submit reports on campaign financing 30 days from the day of holding of the elections [59], and only 10 days after that they receive funds from the state budget which are distributed in proportion to the number of seats won. [60] A separate account for financing the electoral list must be closed 90 days after the announcement of the final election results. [61]

Note that several weeks may pass from the day of holding the elections to the announcement of the final results in the event that, due to appeals, the elections are repeated at a polling station.

In their official reports, electoral lists state that they paid only a part of the campaign expenses. Highest debts has DPS, followed by the coalition of Democrats and URA, then ZBCG and the Europe Now movement.

[59] Article 50 of the Law on Financing of Political Entities and Election Campaigns: Political entity shall prepare a report on the origin, the amount and structure of the funds from public and private sources raised and spent on the election campaign, and shall submit it to the Agency, with supporting documentation, within 30 days from the day of holding of the elections.

[60] According to Article 20 of the Law, 20% of the total fund for financing the election campaign shall be distributed in equal amounts to the political entities, and the remaining 80% of the funds shall be distributed within ten days from the day when the political entities submit to the Agency the reports on funds raised and spent for the election campaign with the supporting documents referred to in Article 50 of this Law.

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

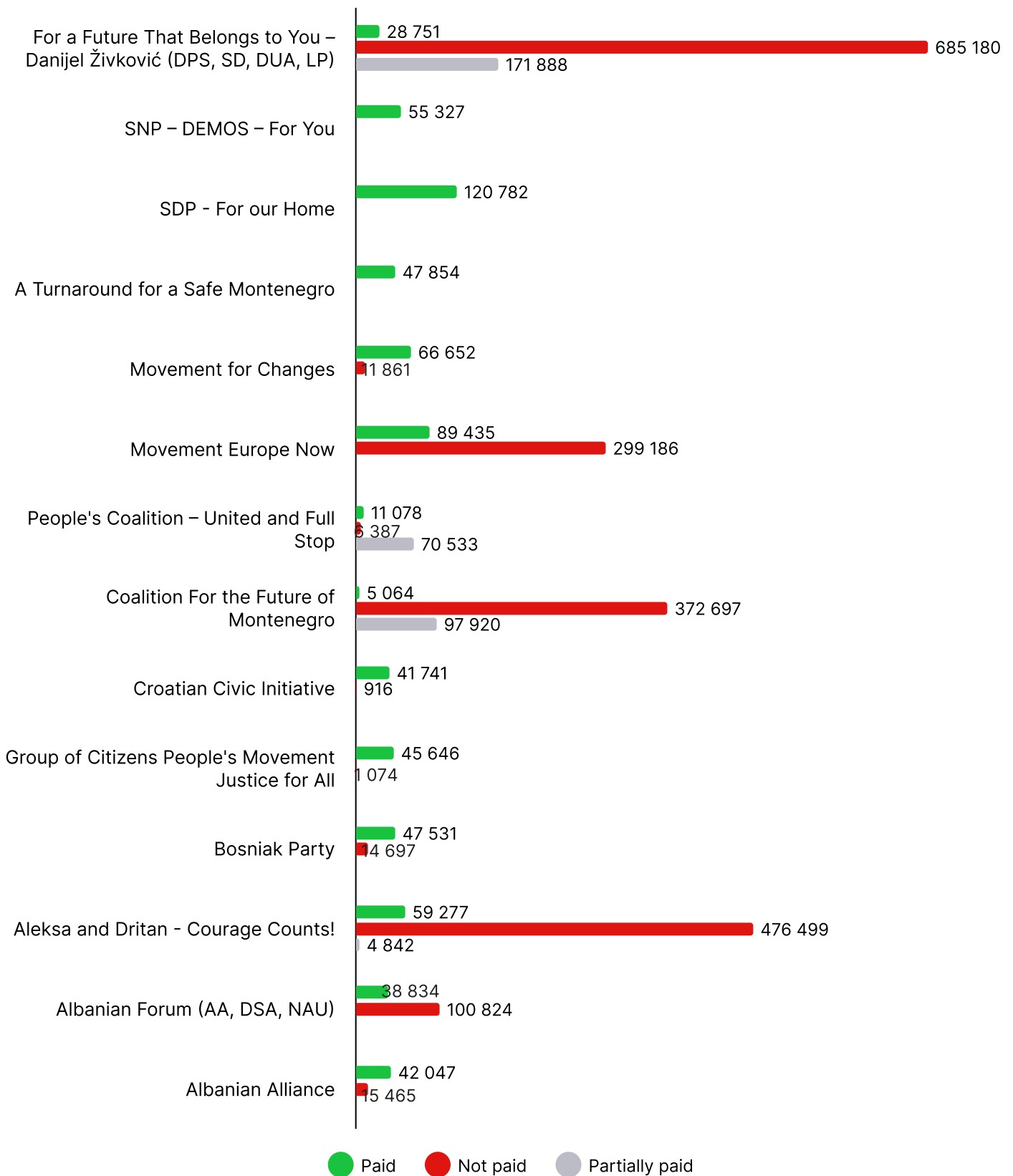


Chart 25: Paid, not paid and partially paid expenses of all electoral lists

2.

FREE MEDIA COVERAGE OF ELECTORAL LISTS

In addition to the national and local public broadcasters, which are not allowed to charge for advertising to political parties, all private TV stations also had free media coverage of the electoral lists, which included special segments in news broadcasts and special programs dedicated to the elections.

Duration of free media coverage on commercial TV stations is not quite precisely regulated, which leaves room for covert marketing of some electoral lists. Some media introduced special shows and obviously favoured some lists, thus, the question arises as to whether such actions should be treated as donations.

Public broadcasters, and especially commercial broadcasters, did not provide the same space to all electoral lists. Free media coverage of the ZBCG coalition lasted the longest (19%), in second place was the coalition of Democrats and URA (16%), in third place was DPS (12%), and in fourth place was Europe Now, Movement for Changes and SDP with 9% each.

The data given in this chapter refer to the duration of the media coverage of an electoral list, regardless of whether it is positive, neutral or negative.

The Agency for Electronic Media (AEM) stated in the Rulebook on rights and obligations of broadcasters for the 2023 parliamentary elections:

"Political advertising is radio or television advertising, with or without financial compensation, which recommends the submitters of electoral lists and candidates from electoral lists or their activities, ideas or political views." [62]

According to the AEM's Rulebook, a public broadcaster, i.e. a commercial or non-profit broadcaster, which enables media coverage, must adopt special rules on media coverage during the election campaign and make them public. [63]

Broadcasters are obliged to note whether it is paid or free advertising [64], but in practice, the TV segments themselves are usually not marked. This greatly complicates the monitoring of advertising in the media, because it is almost impossible to determine which advertising is paid and which is free.

The data published by the Agency for Electronic Media show that electoral lists had several times longer duration of free media coverage than the paid one, while some political structures were clearly favoured in certain media.

Paid advertising of all lists on all TV stations lasted 55,341 seconds, while free coverage lasted 1,326,902 seconds i.e. 24 times longer than paid.

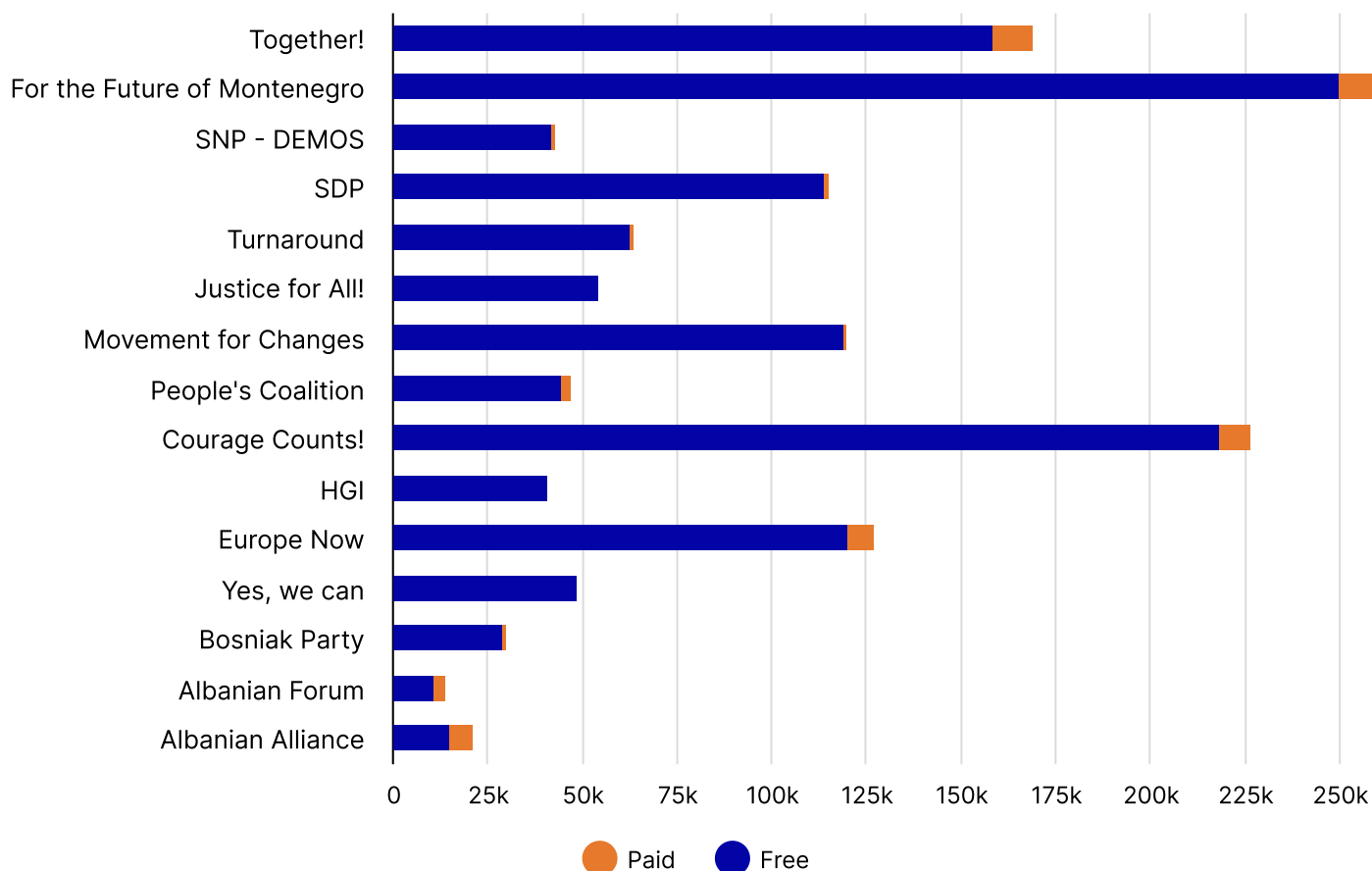


Chart 26: Free and paid advertising of electoral lists in electronic media (in seconds)

[62] Rulebook on Rights and obligations of broadcasters for the 2023 parliamentary elections, Article 2 Paragraph 4.

[63] Ibid, Article 5 Paragraph 1.

[64] Ibid, Article 7 Paragraph 1.

According to the AEM's report, the media coverage of the parties includes

- informing about their activities through **special segments in news broadcasts**,
- **special shows** with debates, TV rallies, interviews, etc.,
- **political marketing** includes reports from rallies produced by electoral lists that public broadcasters air in commercial marketing blocks.



Total duration of different types of media coverage (in seconds) – free and paid

About 73% of the total media coverage of electoral lists related to special shows dedicated to the elections, 14% to free political marketing, 9% to reporting on the activities of electoral lists in news broadcasts, and only 4% to paid marketing.

ZBCG coalition received the most space within the free media coverage on all Montenegrin TV stations, about 19%. In second place is the coalition of Democrats and URA with 16%, and in third place is the coalition gathered around DPS with 12%. In fourth place is PES with 9%, slightly more than the Movement for Changes, while SDP had a little less space than them.

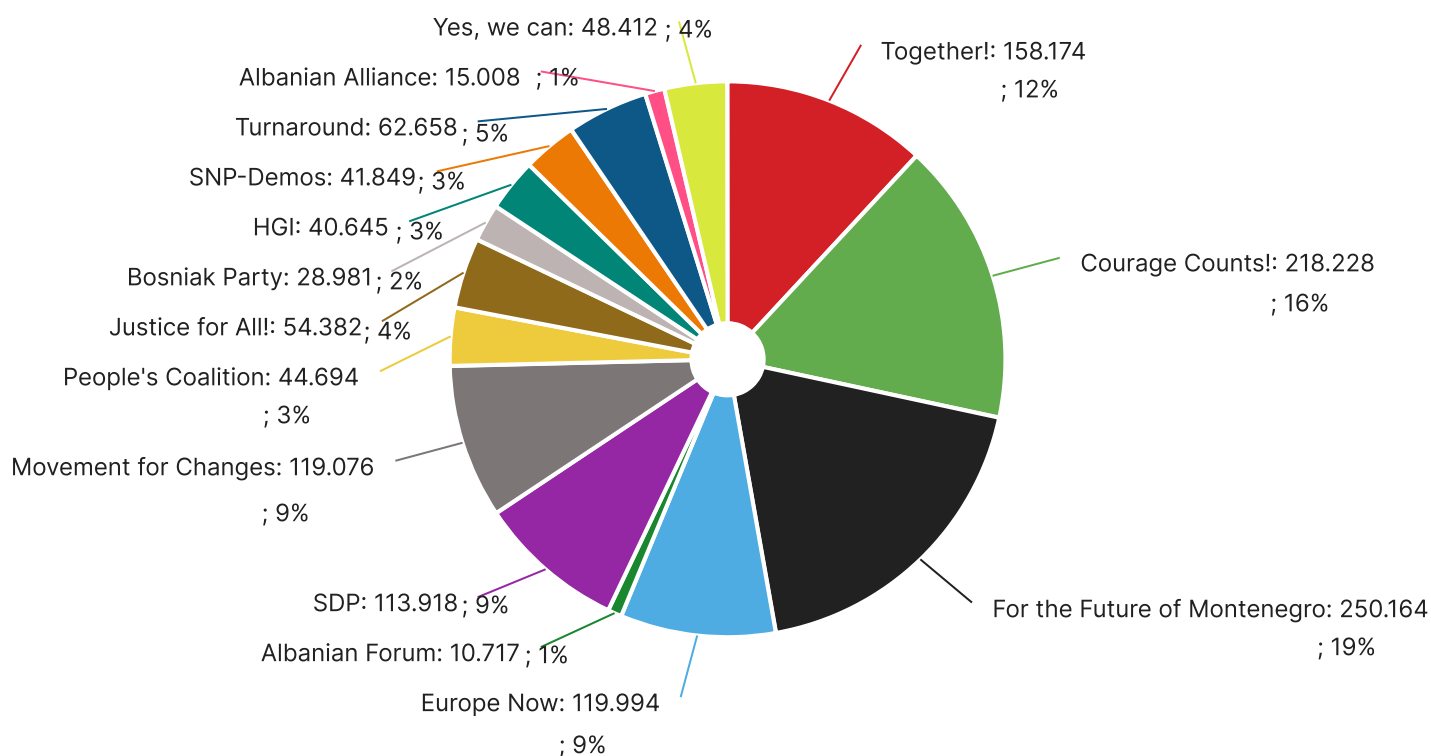


Chart 27: Structure of free media coverage on all Montenegrin TV stations (in seconds)

The most space for the media coverage of electoral lists was on TV A plus (28%), because they were rerunning the show in which the electoral lists were presented several times during the day. In second place are **TV Adria (12%),** Parliamentary Channel (10%), TV Budva (7%) and Prva TV (7%).

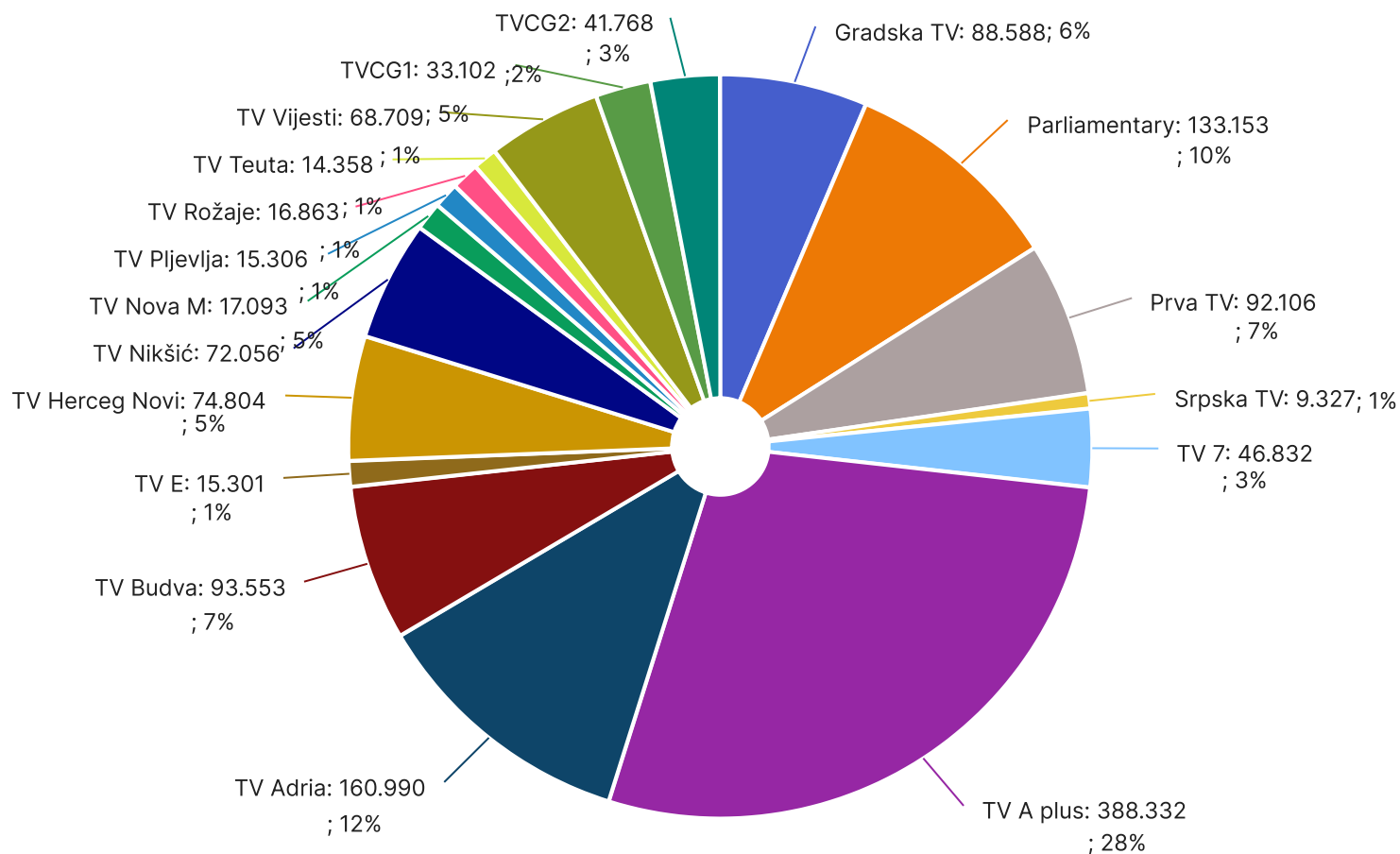
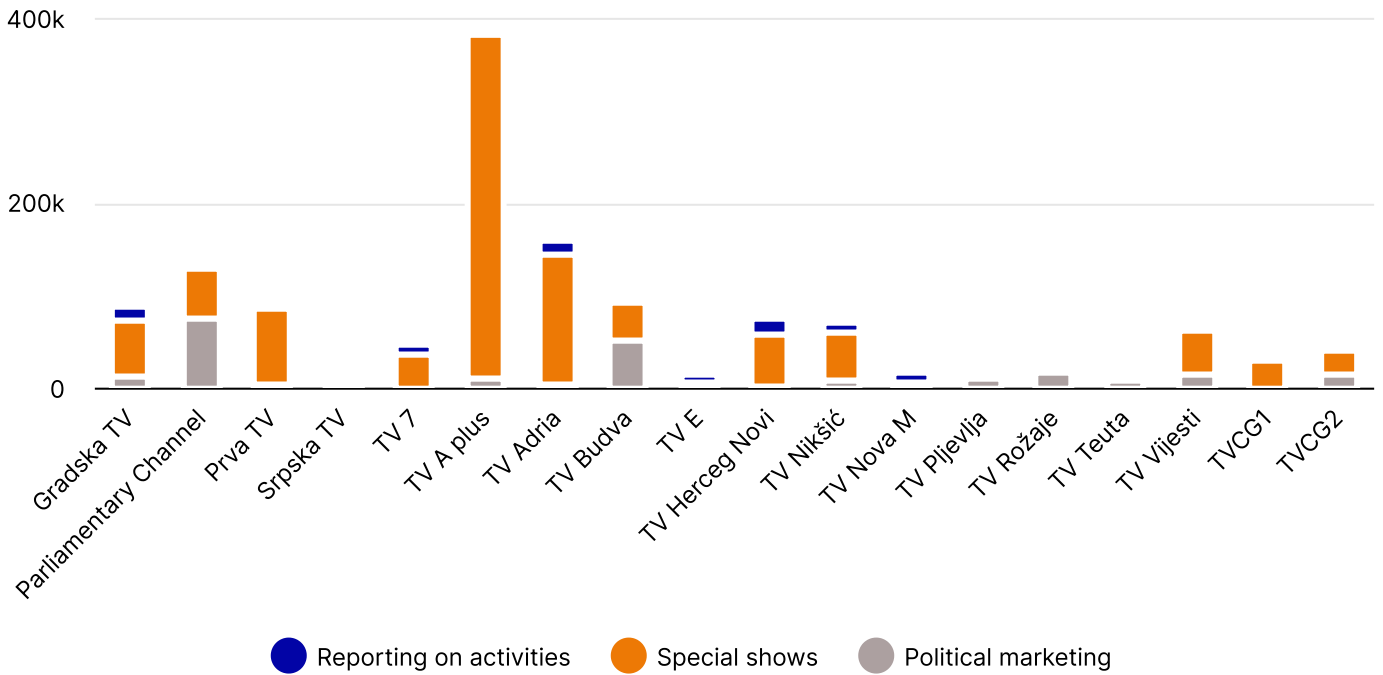


Chart 28: Duration of free and paid media coverage (in seconds), by TV stations

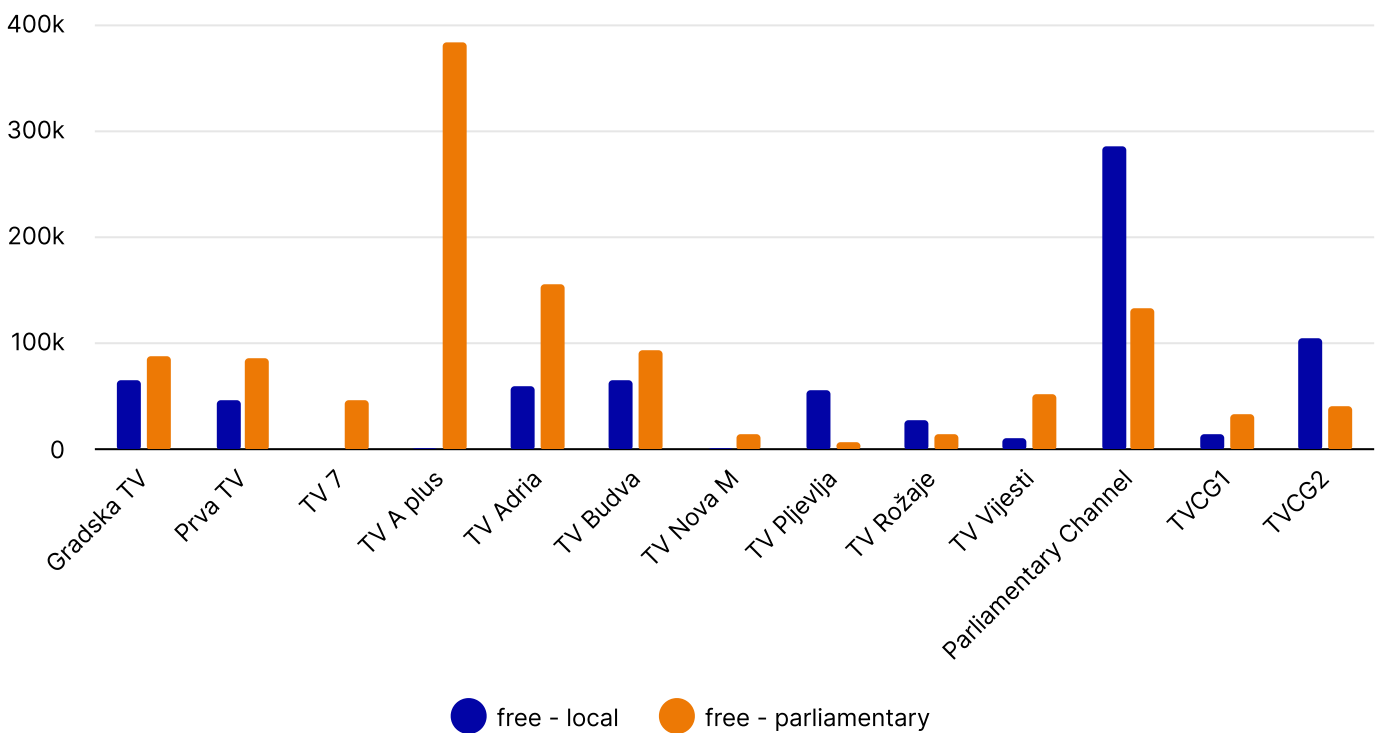
Most TV stations **had special shows**, while a more significant advertising is noticeable on the Parliamentary Channel, TV Budva and smaller local public broadcasters. It is interesting that **not a single show broadcast by TV E in the pre-election period was classified as a media coverage.**

Chart 29: Duration of different types of free media coverage (in seconds), by TV stations



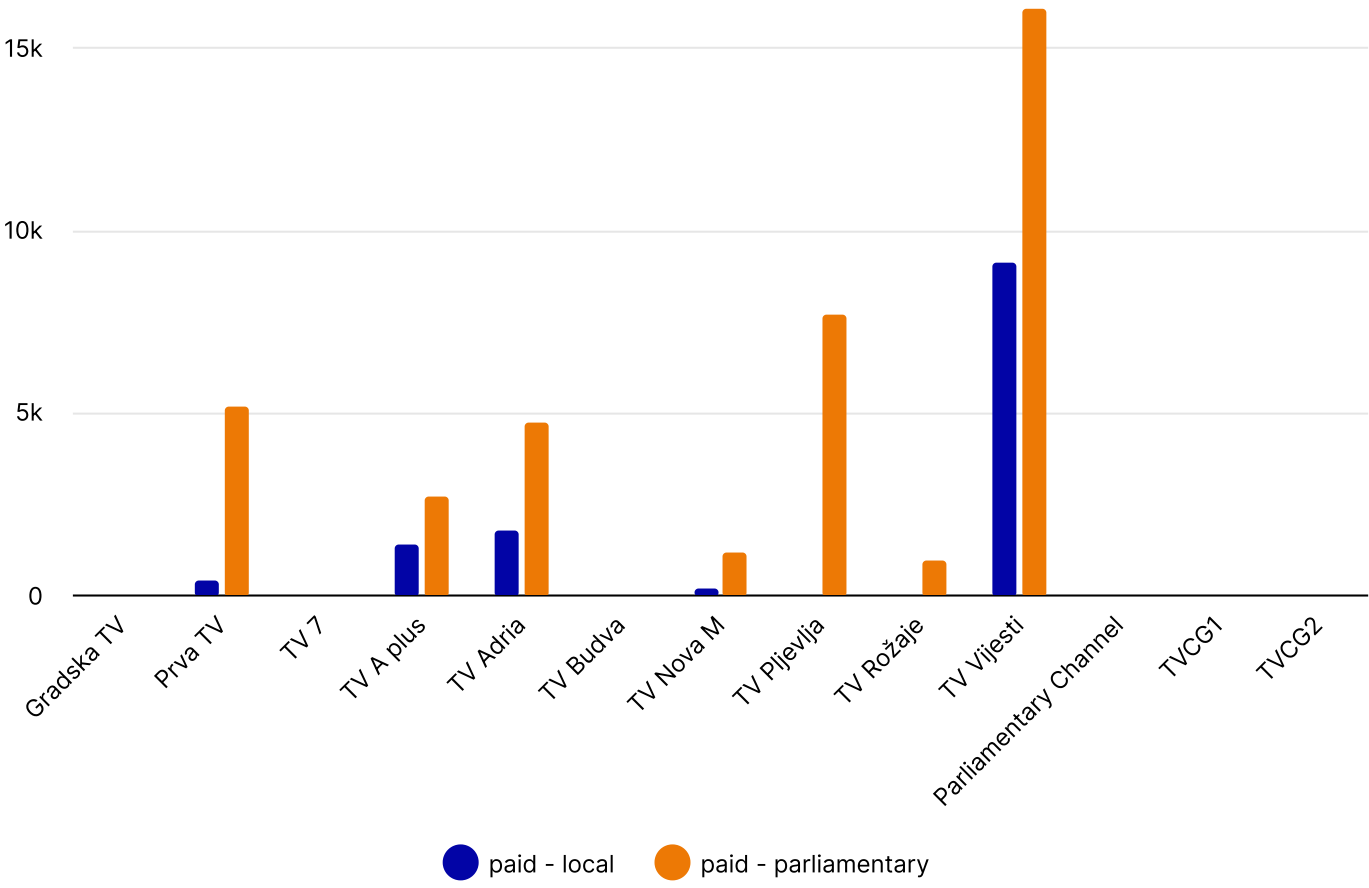
A comparison with the data from the local elections held in October 2022 shows that most TV stations gave more free advertising space for the parliamentary elections, TV A plus in particular. However, on the Parliamentary Channel and the TVCG Channel 2, there was twice less free space for the presentation of electoral lists in parliamentary elections than in local elections.

Chart 30: Duration of free advertising in parliamentary and local elections, per TV stations (in seconds)



On all TV stations that had paid marketing, more time was spent on parliamentary elections than on local elections.

Chart 31: Duration of paid advertising in parliamentary and local elections, per TV stations (in seconds)



2.1. Radio and Television of Montenegro

Channel 1 of the Radio and Television of Montenegro (RTCG) fairly equally divided the space for media coverage, thus, almost all electoral lists received about 7% of the total space.

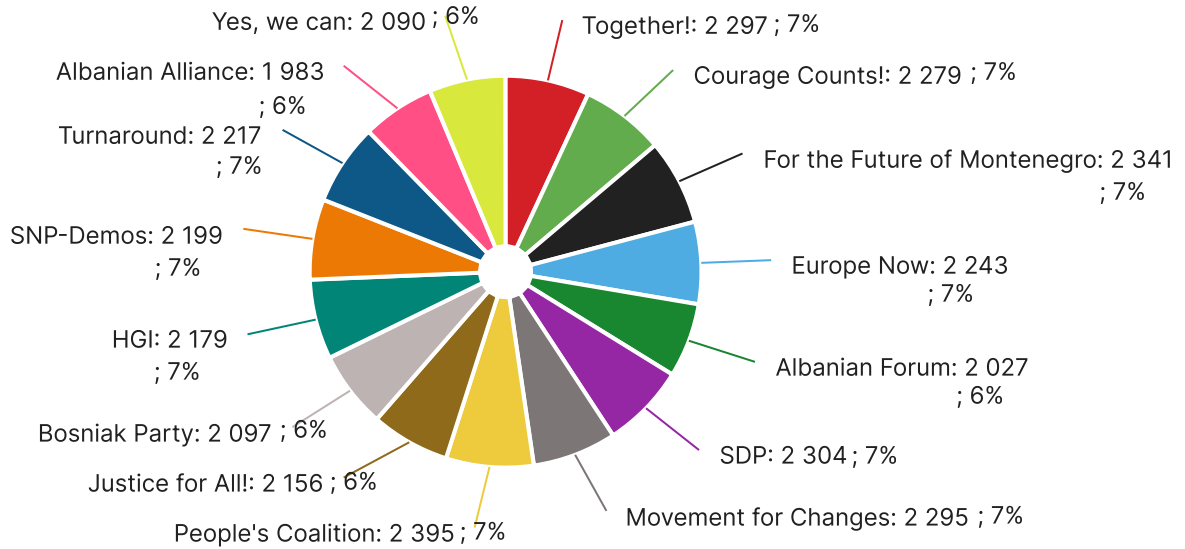
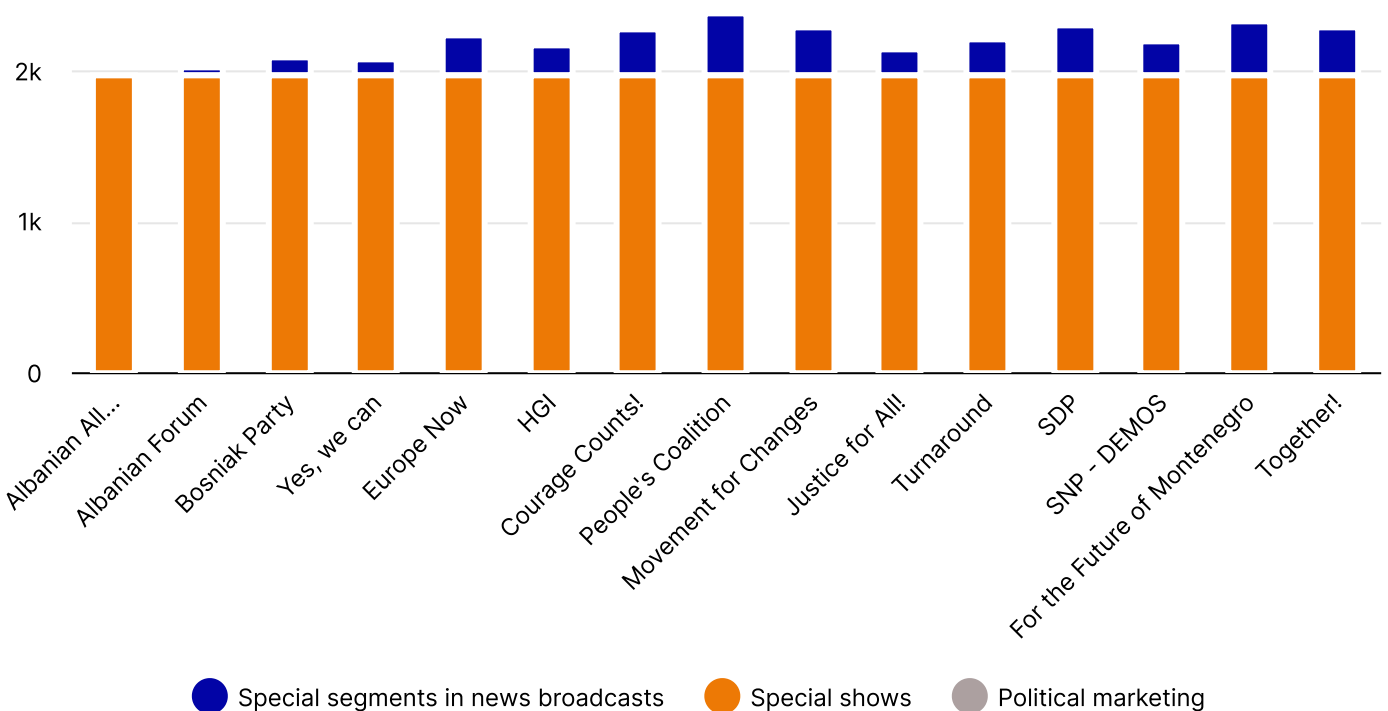


Chart 32: Participation of electoral lists in free media coverage at RTCG 1

However, there were no reports on the Albanian Alliance in the news broadcasts, and the Albanian Forum and the Bosniak Party were rarely represented, while the People's Coalition, ZBCG and SDP received the most space.

Chart 33: Types of free media coverage on RTCG 1, by electoral lists



On TVCG Channel 2, the coalition of Democrats and URA (9%) and the Movement for Changes (9%) got the most space, followed by the People's Coalition, Justice for All, Turnaround and Europe Now with 8% each. On the other hand, **the coalition gathered around DPS got only 4% of the total space on the TVCG Channel 2.**

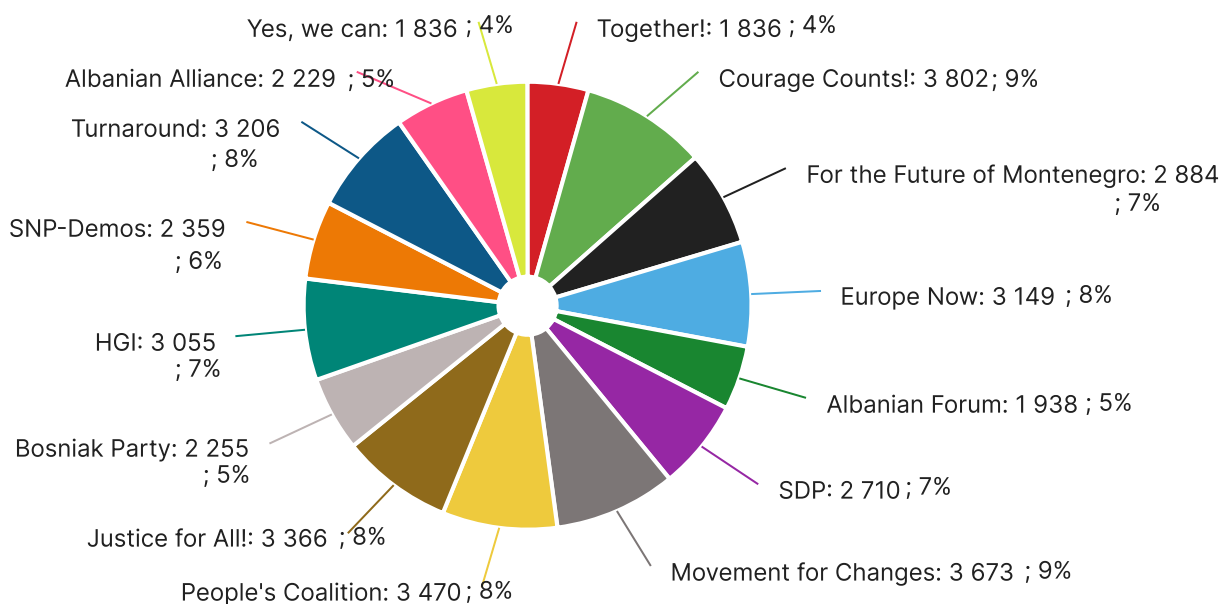
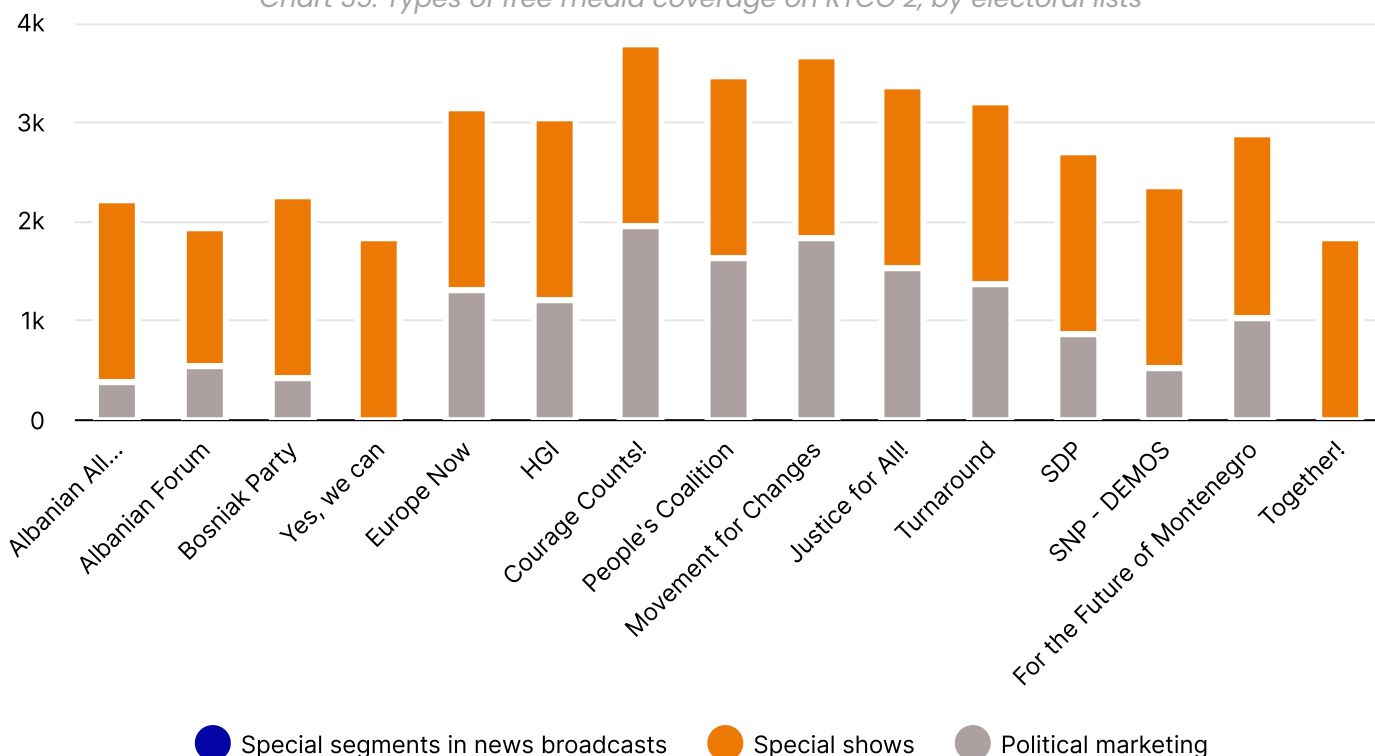


Chart 34: Participation of electoral lists in free media coverage on RTCG 2

While the participation of electoral lists in special shows on RTCG 2 was mostly even, with the exception of the Albanian Forum, which received slightly less space, the duration of free political marketing differed to a great extent by electoral lists. **The coalition gathered around DPS and the list Yes, we can, had no free political marketing at RTCG 2 at all, while the coalition of Democrats and URA and the Movement for Changes had the most space.**

Chart 35: Types of free media coverage on RTCG 2, by electoral lists



On the Parliamentary Channel of RTCG, the electoral lists of ZBCG, People's Coalition, Coalition of Democrats and URA, Turnaround and Justice for All received the most space (9% each). The coalition around DPS and the Movement for Changes received about 8% each. It is also interesting that **the minority parties**, the Albanian Forum and the Albanian Alliance each received **only 3%** of free advertising space on the Parliamentary Channel.

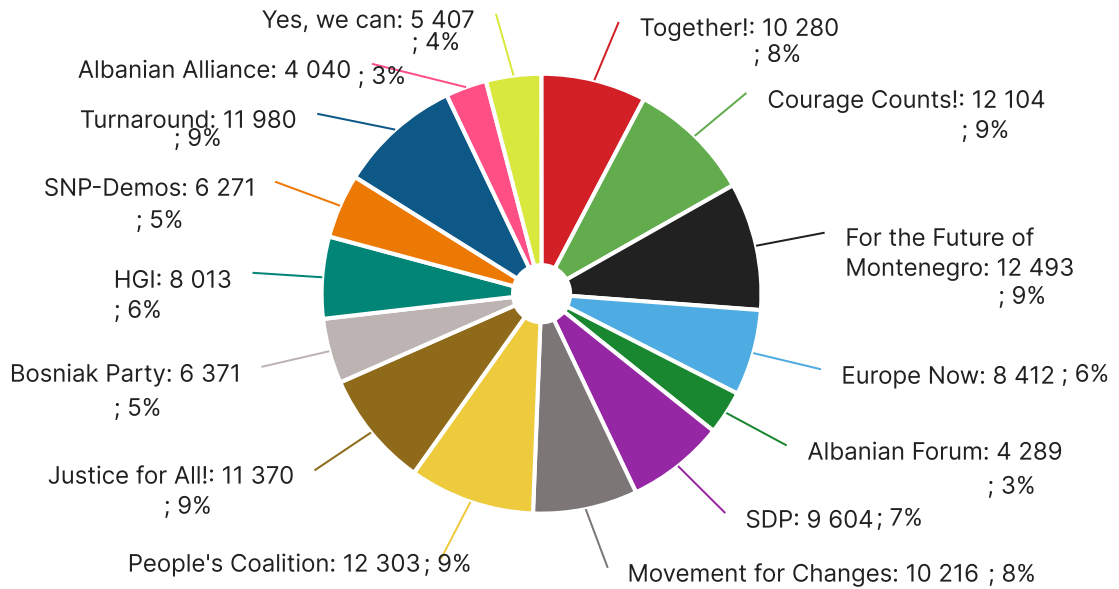
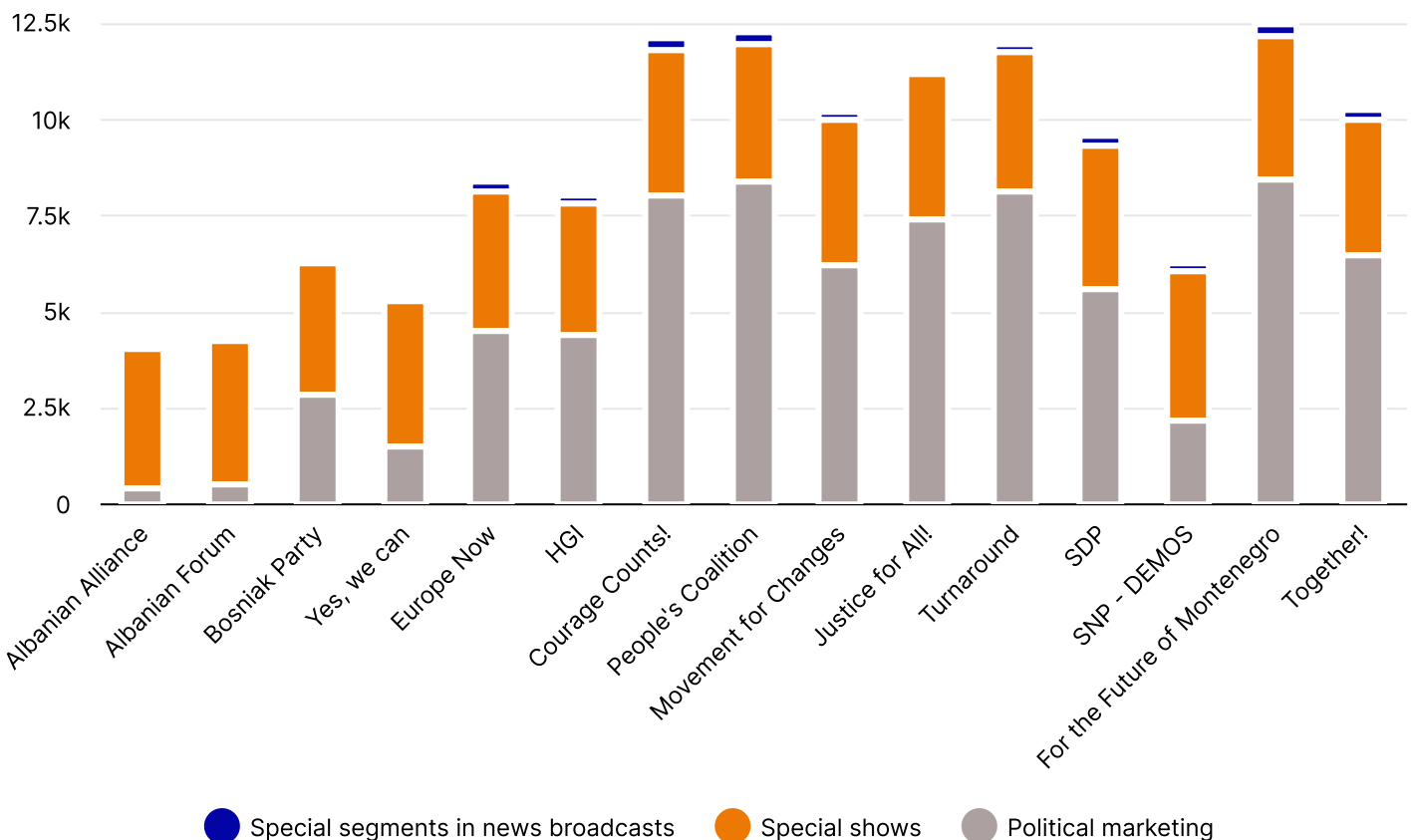


Chart 36: Participation of electoral lists in free media coverage on the Parliamentary Channel

The Albanian Alliance and the Albanian Forum received extremely little space within the framework of political marketing on the Parliamentary Channel, while the ZBCG, the People's Coalition, the Coalition of Democrats and URA, and Turnaround had the most space.

Chart 37: Types of free media coverage on the Parliamentary Channel, by electoral lists



Of all the RTCG channels, the most space for media coverage of electoral lists was on the Parliamentary Channel (64%), followed by the Channel 2 (20%), and the least on the Channel 1 (16%).



Duration of free political marketing on all RTCG programs

Total data for all RTCG channels show that the media house did not evenly distribute the space for media coverage to all electoral lists, and the parties representing national minorities had the least space. Some lists that did not even attain parliamentary status had twice as much time as others.

The coalition of Democrats and URA (9%), the People's Coalition led by Dejan Vukšić (9%), which did not pass the census, and the ZBCG coalition (9%) had the most media coverage on all RTCG channels. Right behind them, with 8% each, are three lists that did not enter the parliament: Turnaround, Justice for All led by Vladimir Leposavić, and Movement for Changes.

They are followed by SDP (7%), the coalition gathered around DPS and Europe Now with 7% each. HGI received 6% of the total media coverage on all RTCG channels, while SNP and the Bosniak Party received 5% each. Yes, we can, the Albanian Forum and the Albanian Alliance each had 4%.

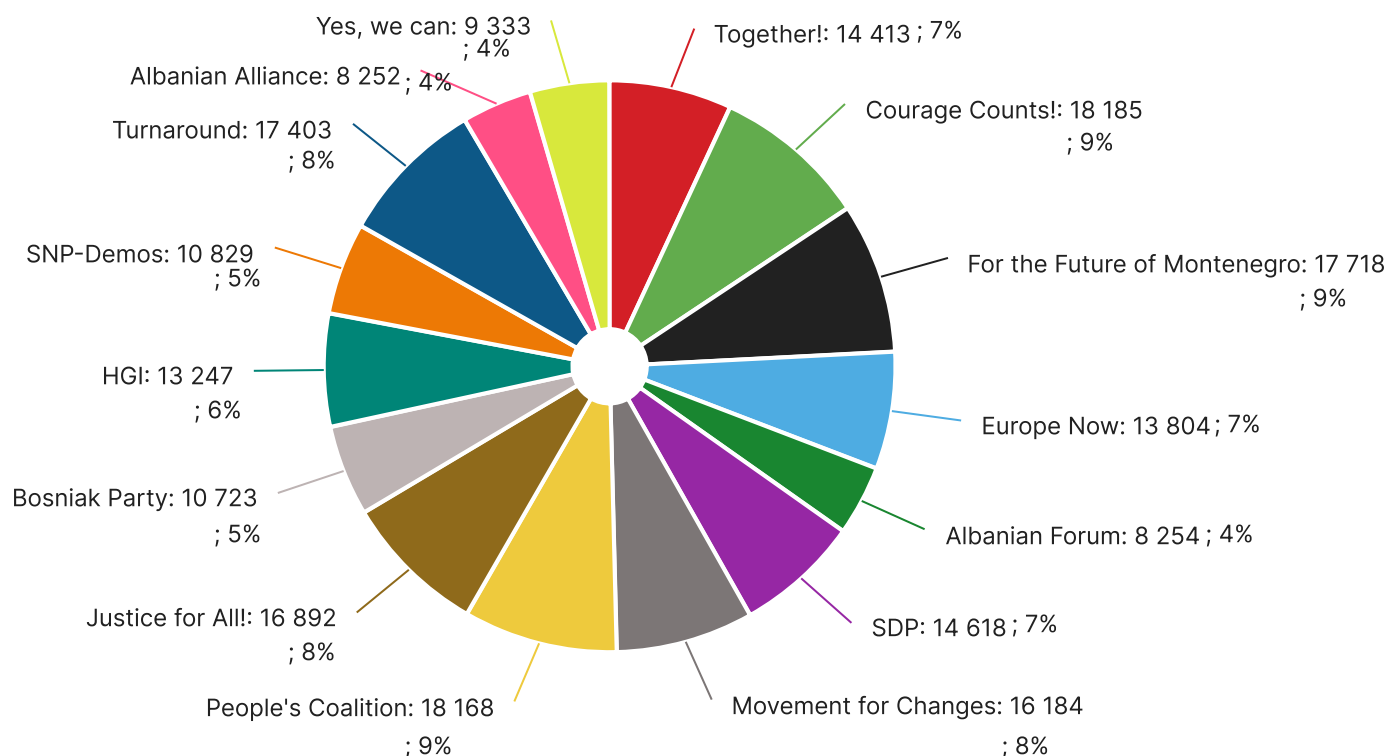
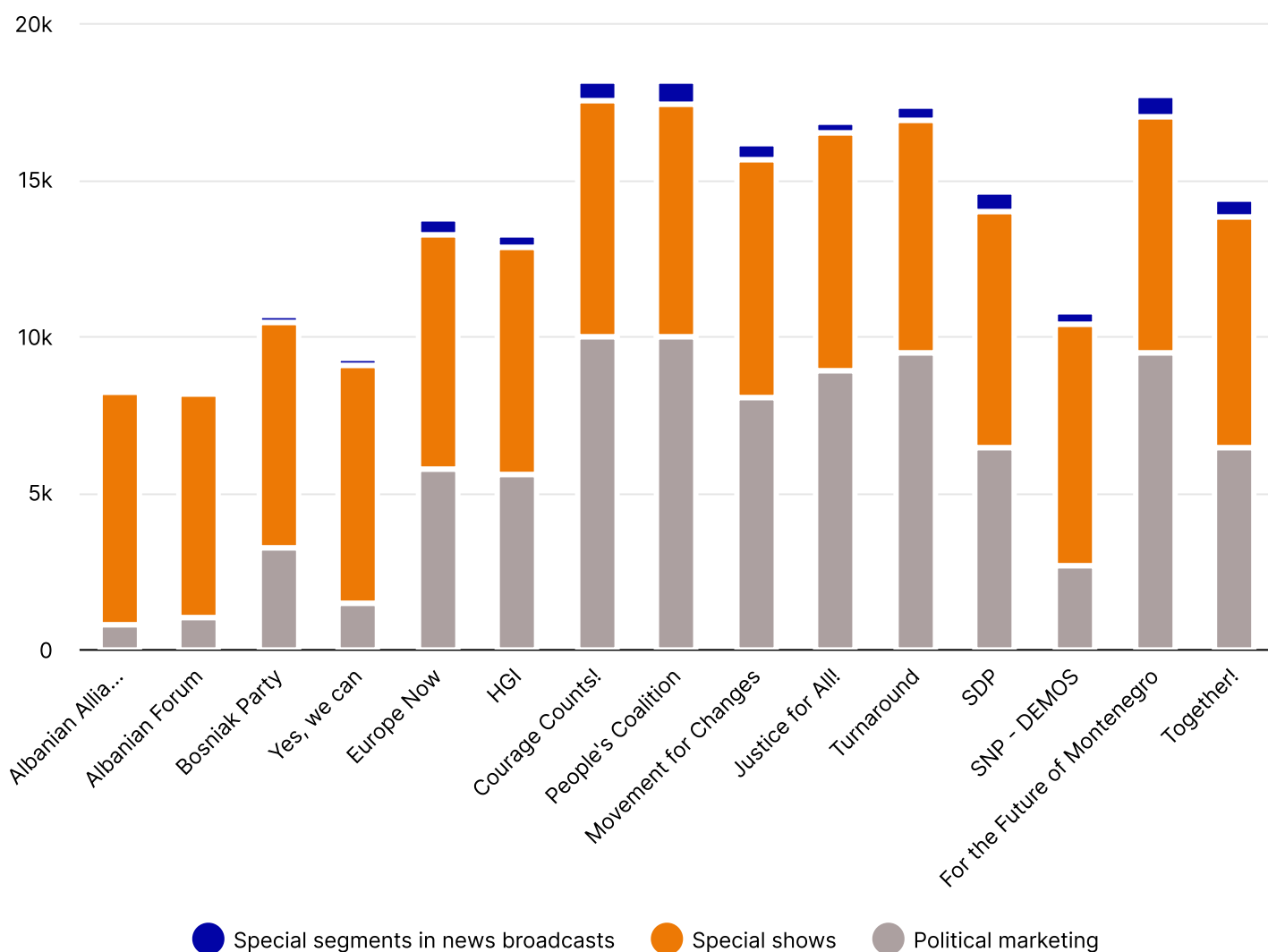


Chart 38: Participation of electoral lists in free media coverage on all RTCG programs

There are significant and inexplicable differences in the duration of political marketing in all RTCG programs. For example, a non-parliamentary party was advertised 12 times longer than a minority party.

The People's Coalition had the most space for political marketing, which was advertised on RTCG channels 12 times longer than the Albanian Alliance. It is followed by the coalition of URA and Democrats, Turnaround, and ZBCG with 11% each. The next are Justice for All (10%) and Movement for Changes (9%), and the coalition around DPS and SDP with 7% each. They are followed by Europe Now and HGI with 6% each, Bosniak Party (4%), SNP (3), Yes, we can (2), and the Albanian Forum and the Albanian Alliance with 1% each.

Chart 39: Types of free media coverage on all RTCG channels, by electoral lists



2.2. Other public broadcasters

Gradska TV, as a public broadcaster, did not charge any electoral list for advertising, but all information was broadcast within free programmes. On that TV station, **the coalition gathered around DPS was predominant with 40% of the space, in second place was SDP with 13%, and HGI with 12% of the total broadcast program.**

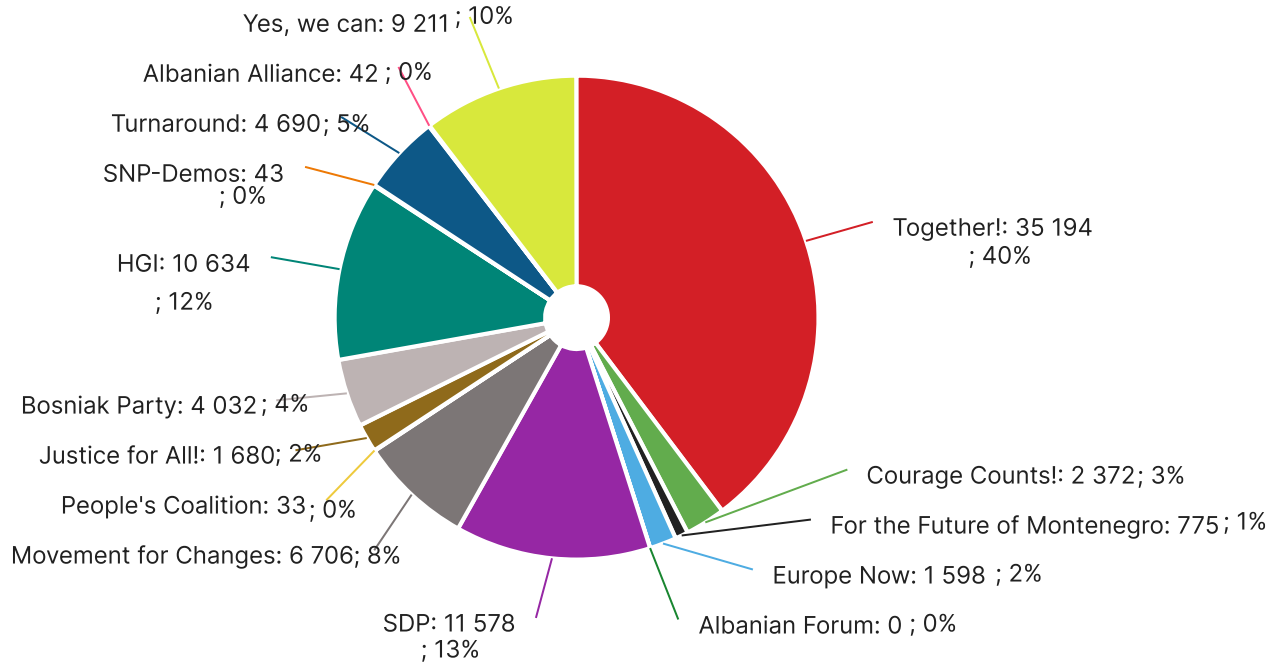


Chart 40: Participation of electoral lists in free media coverage on Gradska TV

The largest part of the media coverage related to special shows dedicated to the elections (67%), in second place were special segments in news broadcasts (17%), and political marketing (16%). What is noticeable is the distinct dominance of the coalition around DPS, which had no political marketing on this TV station, but their advertising related to special segments in news broadcasts and participation in shows.

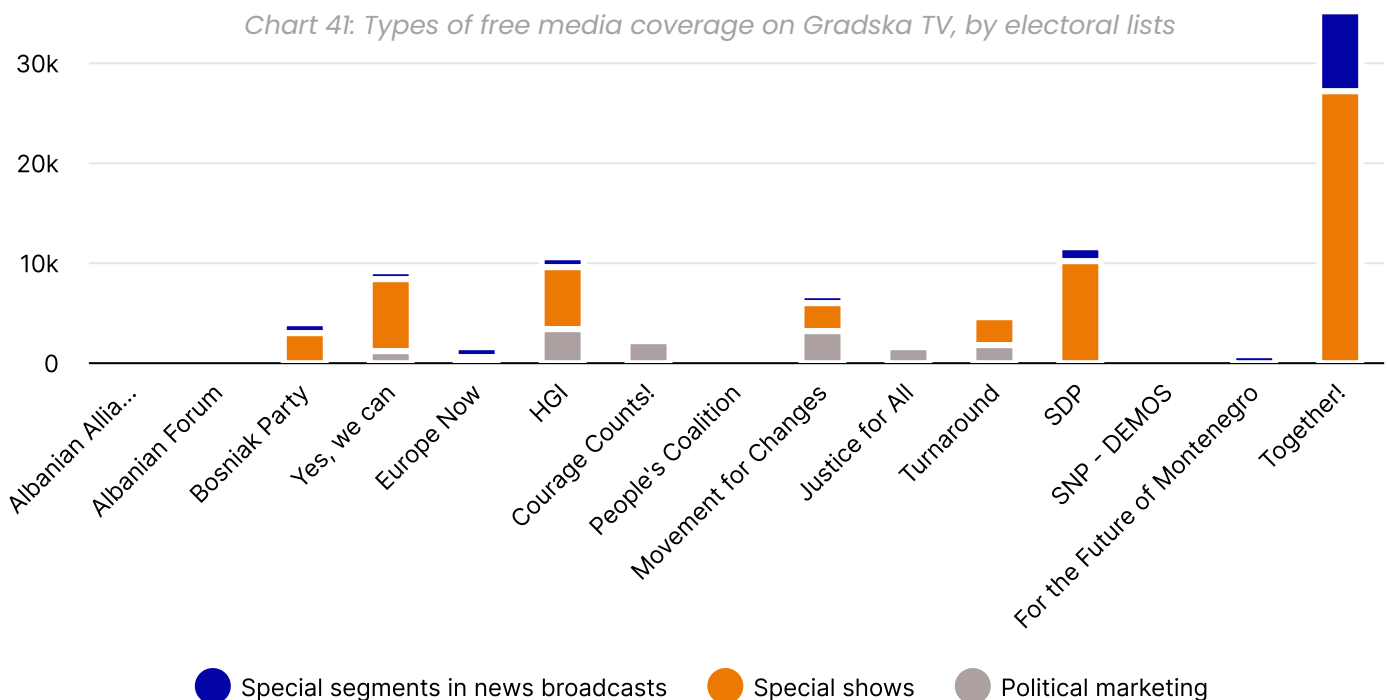


Chart 41: Types of free media coverage on Gradska TV, by electoral lists

TV Budva gave the most space for free marketing to the coalition of URA and Democrats (14%), followed by the coalition gathered around DPS (12%), ZBCG (12%) and Turnaround (12%). The Bosniak Party, the Albanian Forum and the Albanian Alliance did not receive any space on this TV station.

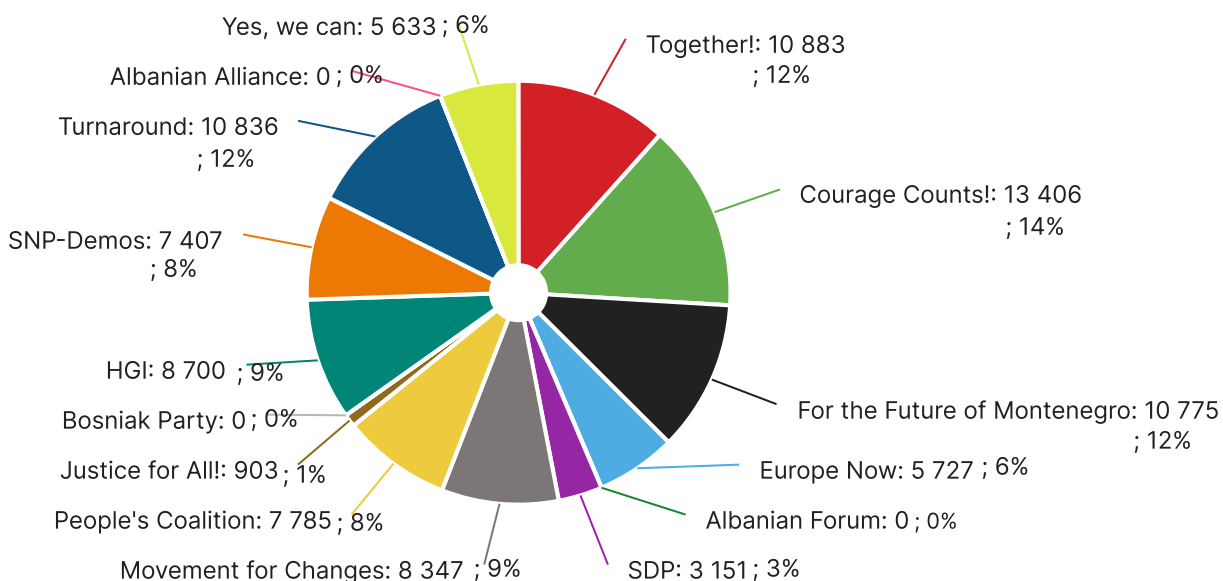
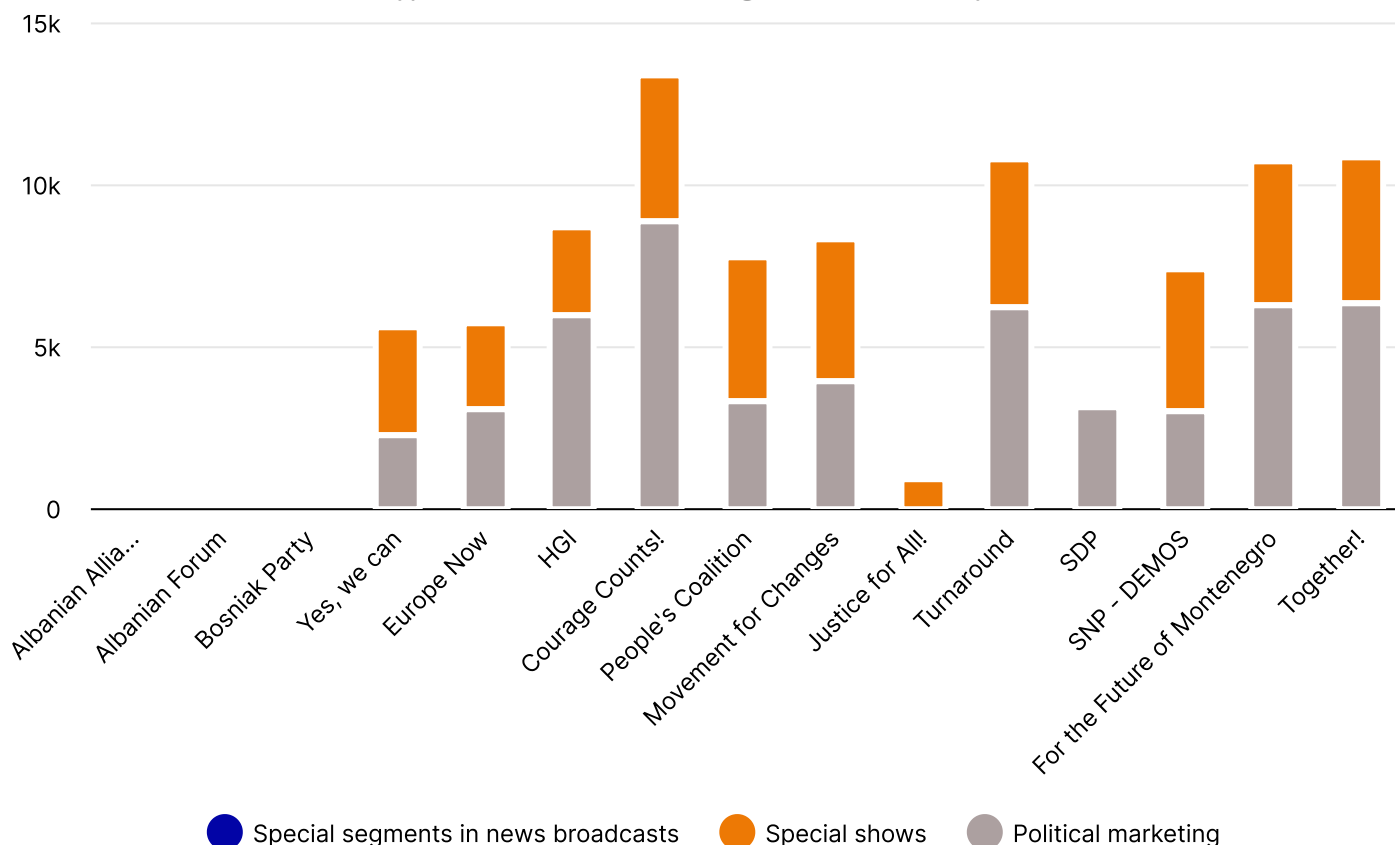


Chart 42: Participation of electoral lists in free media coverage on TV Budva

Somewhat more space on TV Budva was given to political marketing (56%) than to special shows dedicated to elections (44%). **The coalition of Democrats and URA had significantly more space for political marketing than other lists.**

Chart 43: Types of free media coverage on TV Budva, by electoral lists



TV Herceg Novi gave the most free media space to Turnaround (13%), in second place was the Coalition of Democrats and URA (12%), and in third place was the coalition gathered around DPS (12%). This TV station also did not give space to minority parties.

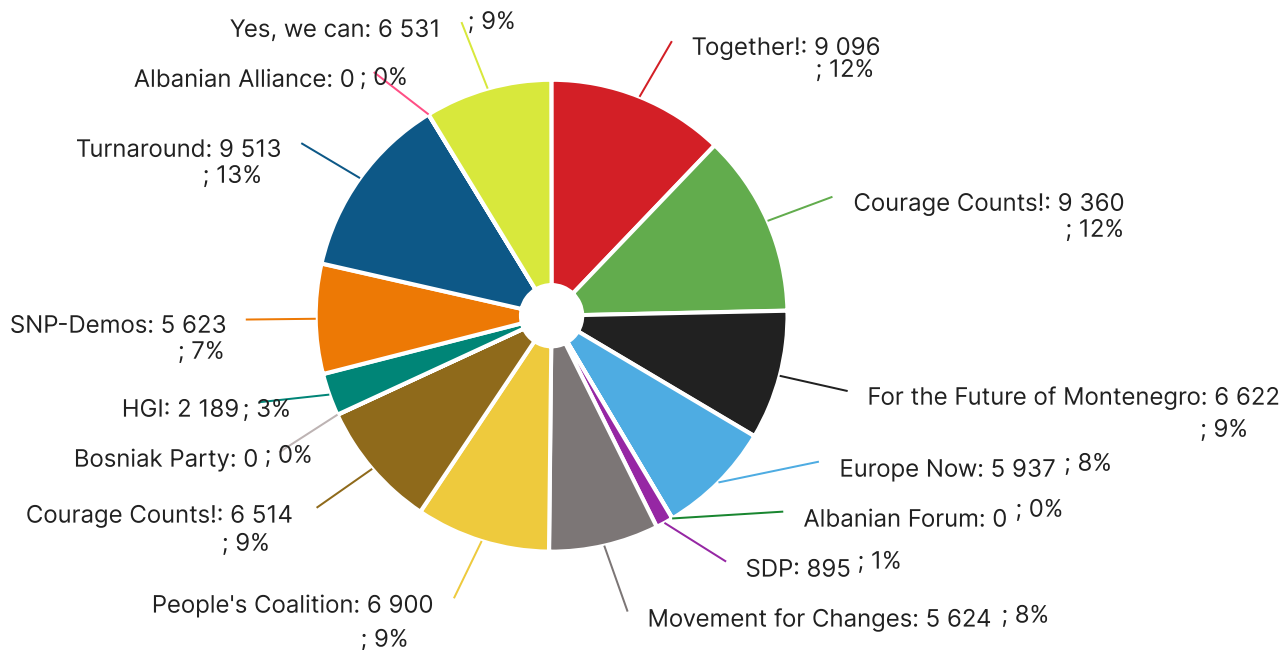
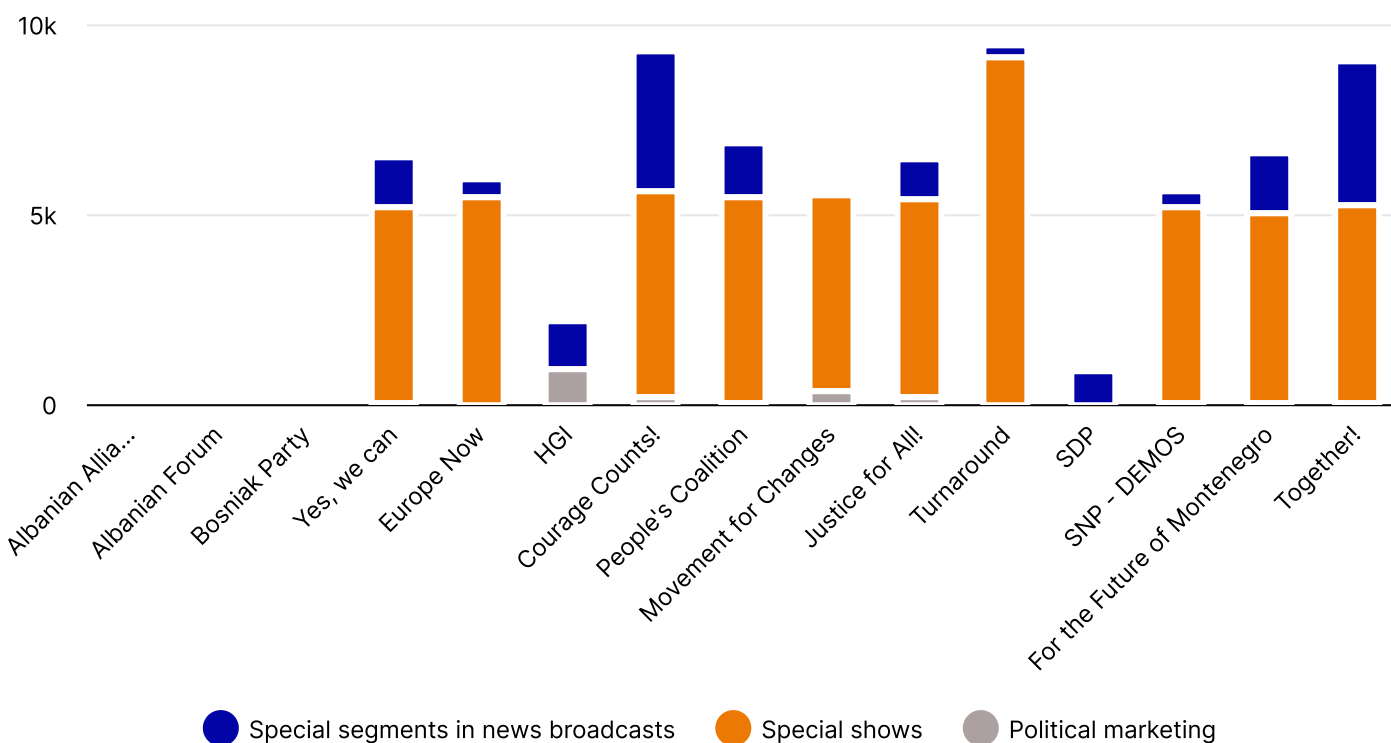


Chart 44: Participation of electoral lists in free media coverage on TV Herceg Novi

The largest part of the media coverage on this TV station related to special shows in which Turnaround had the most space. When it comes to special segments in news broadcasts, the most time was given to the coalition around DPS and the coalition of Democrats and URA.

Chart 45: Types of free media coverage on TV Herceg Novi, by electoral lists



TV Nikšić gave the most space to the coalition of Democrats and URA (24%), followed by ZBCG (16%) and the coalition gathered around DPS (16%).

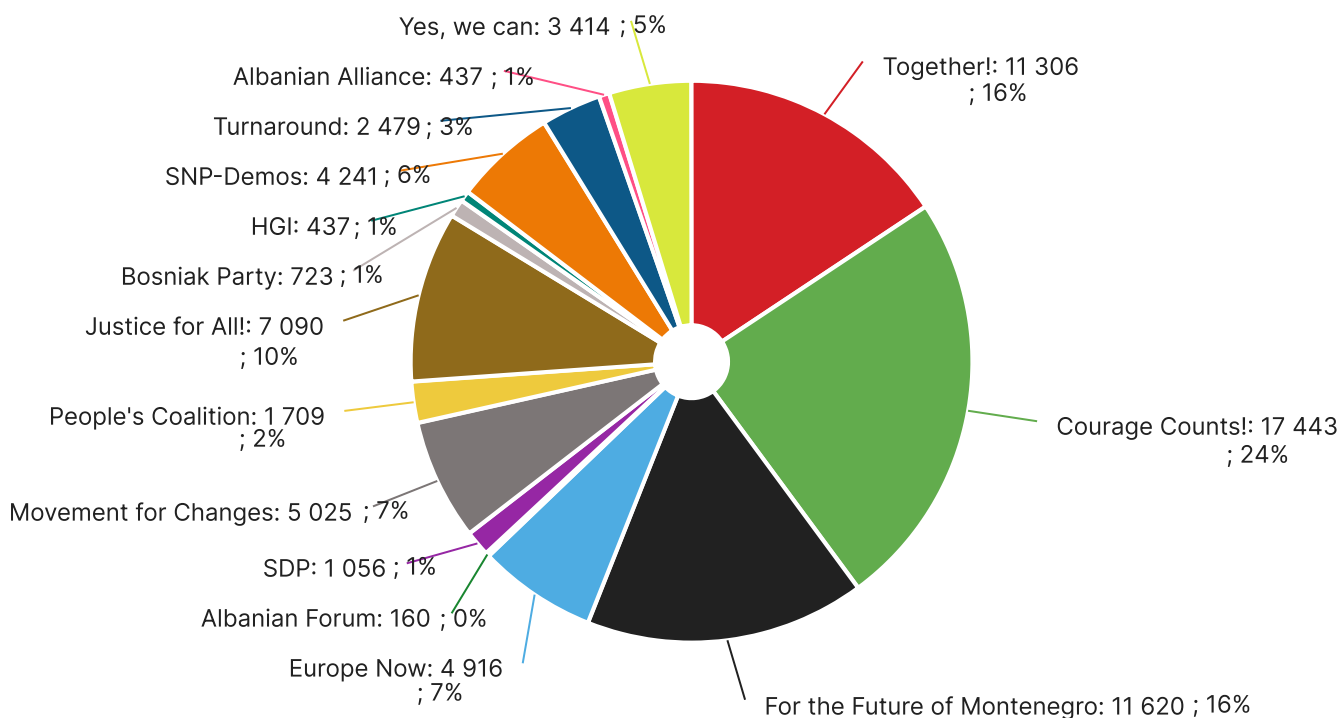
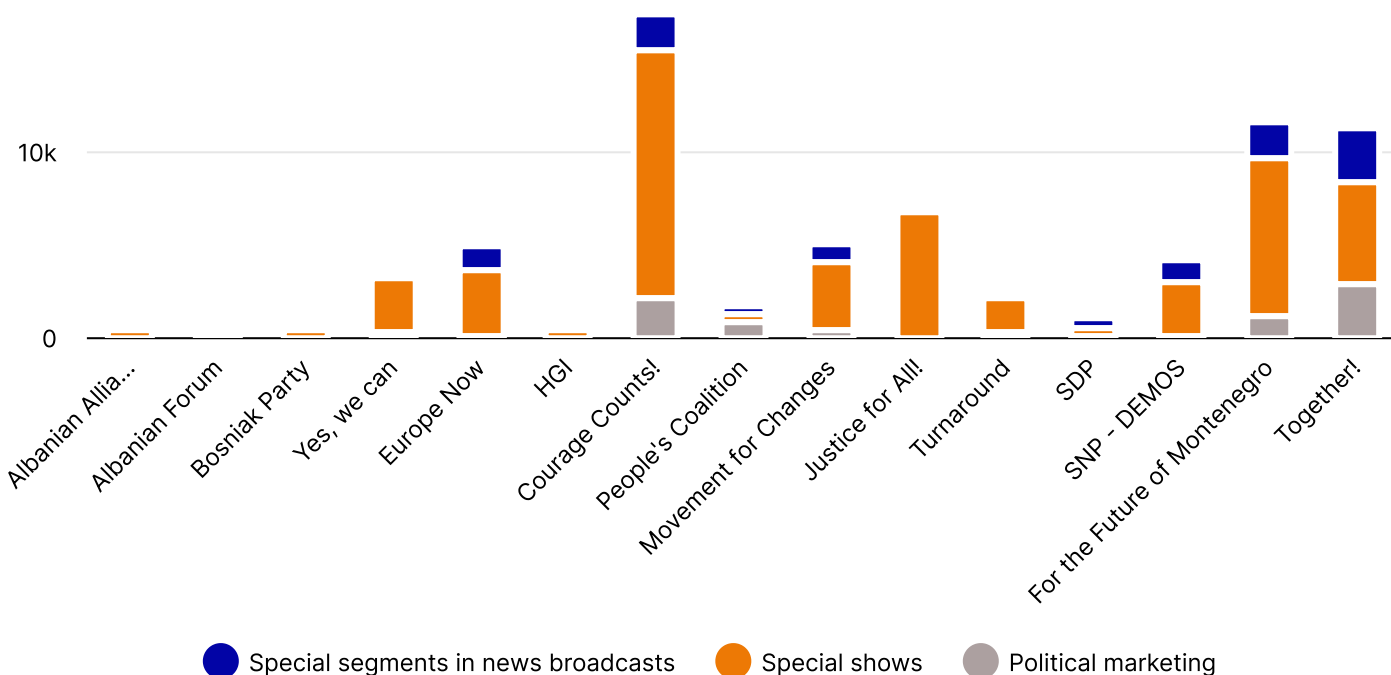


Chart 46: Participation of electoral lists in free media coverage on TV Nikšić

The largest part of the media coverage on this TV station refers to special shows in which the coalition of Democrats and URA had the most space, followed by ZBCG and the coalition around DPS. On the other hand, DPS had the most free political marketing, followed by ZBCG and the coalition of Democrats and URA.

Chart 47: Types of free media coverage on TV Nikšić, by electoral lists



The coalition of Democrats and URA had 29% of the total free marketing on TV Pljevlja, the coalition around DPS 14%, and ZBCG, SNP and Europe Now 10% each.

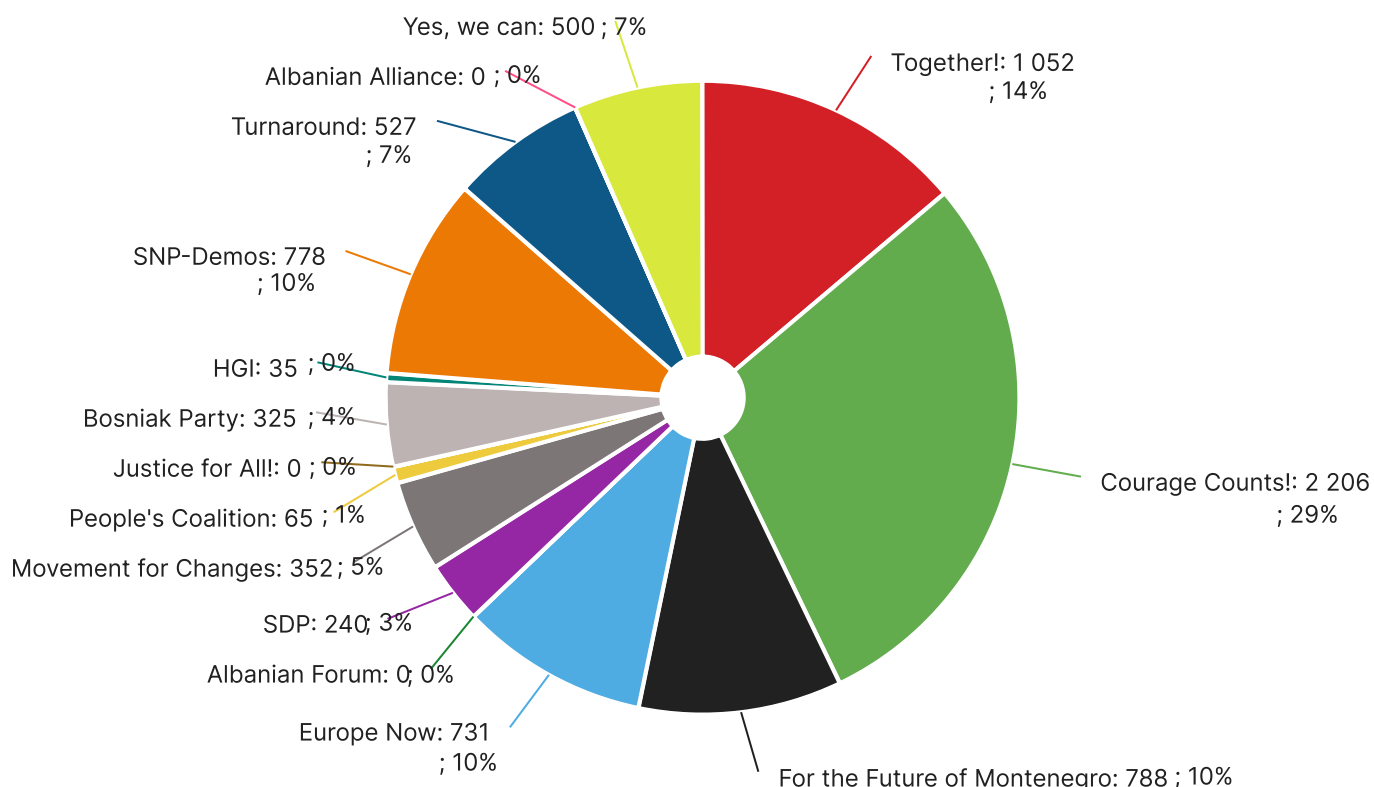
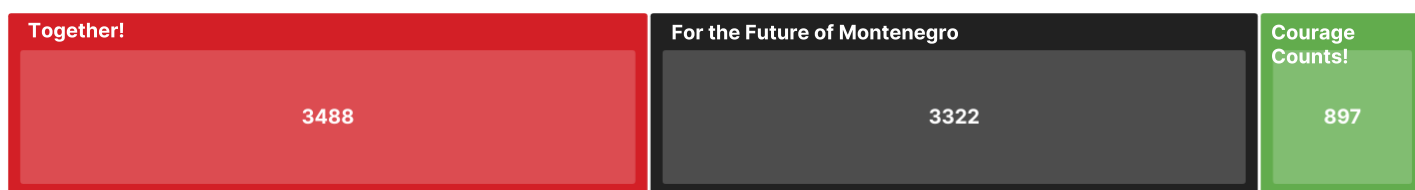


Chart 48: Participation of electoral lists in free media coverage on TV Pljevlja

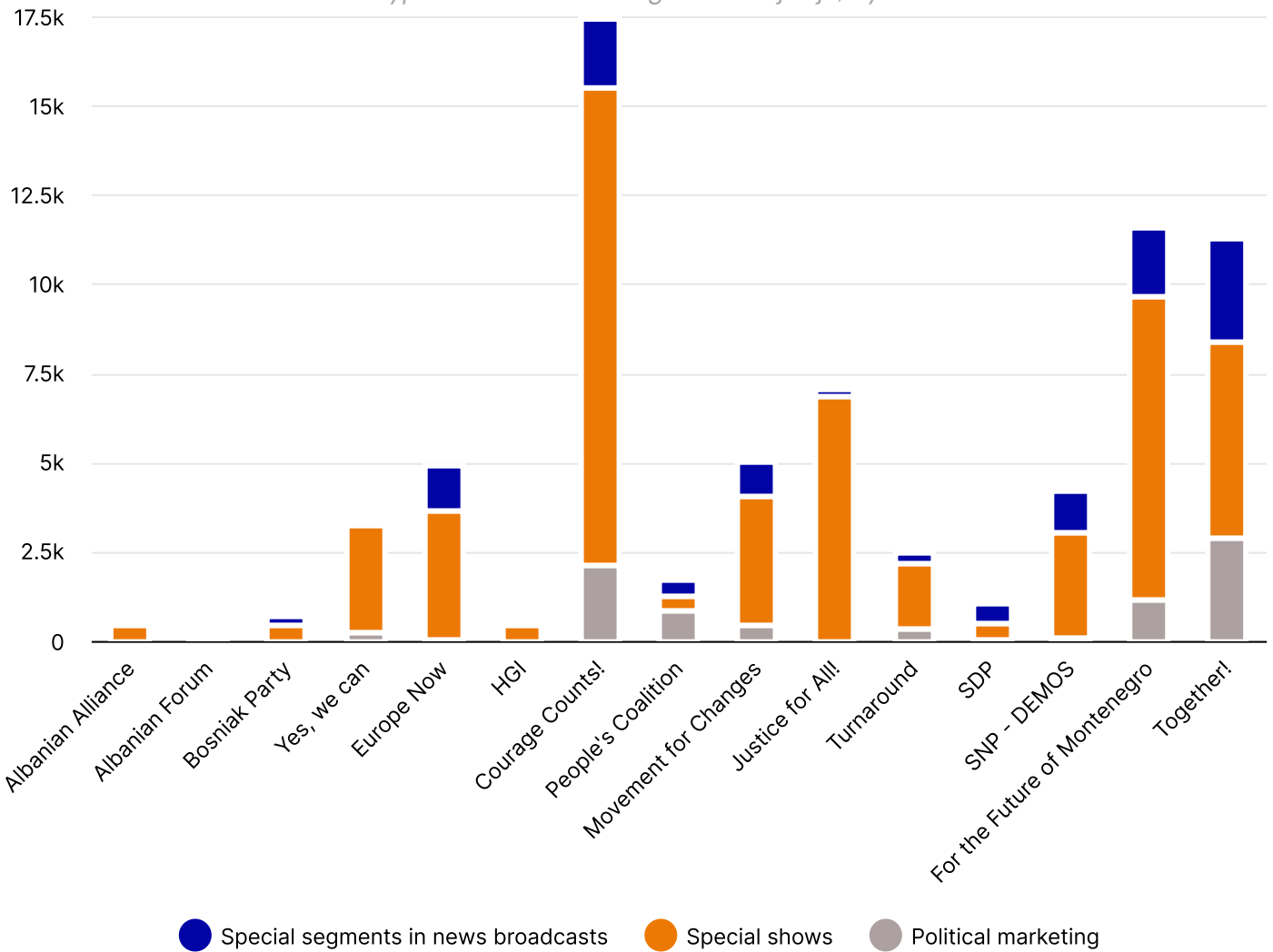
Although public broadcasters are prohibited from paid marketing, the coalition around DPS (45%), ZBCG (43%), as well as the coalition of Democrats and URA (12%) were advertised on TV Pljevlja.



Participation of electoral lists in paid media coverage on TV Pljevlja

Most of the media coverage refers to special shows in which the coalition of Democrats and URA had the most space, followed by ZBCG and the coalition around DPS. On the other hand, DPS had the most free political marketing, followed by ZBCG and the coalition of Democrats and URA.

Chart 49: Types of media coverage on TV Pljevlja, by electoral lists



TV Rožaje advertised the Bosniak Party (22%), the coalition around the DPS (22%) and SDP (15%) free of charge. The Bosniak Party was the only party with paid advertisements on that TV station.

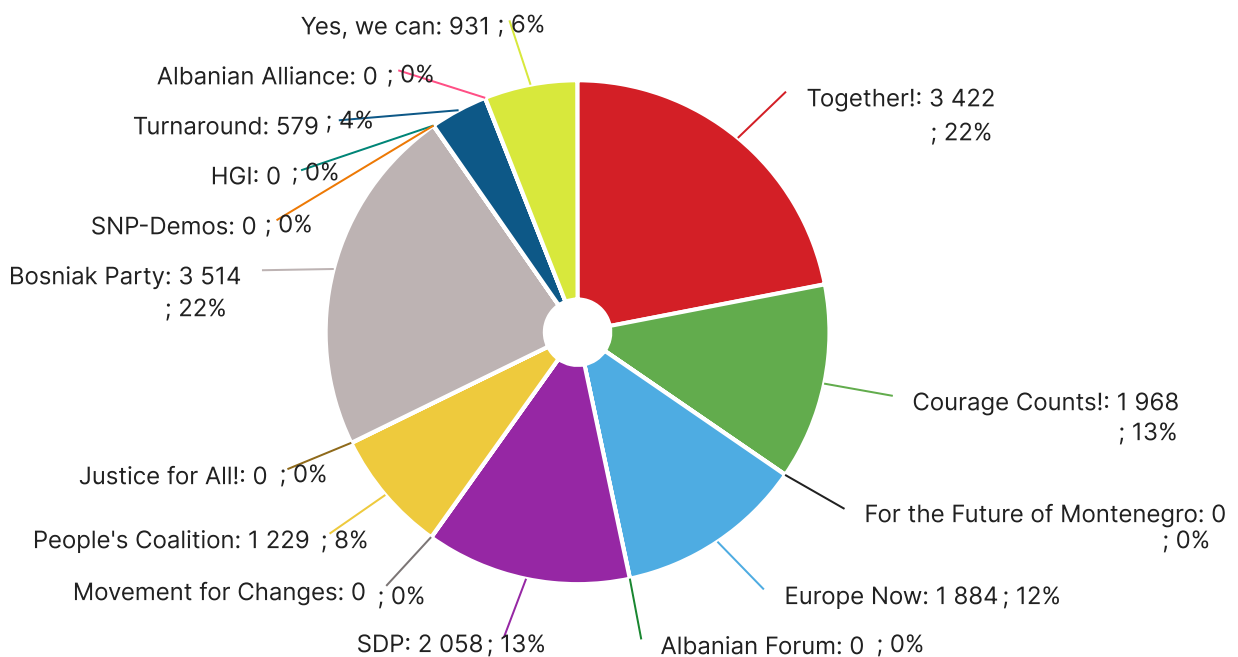
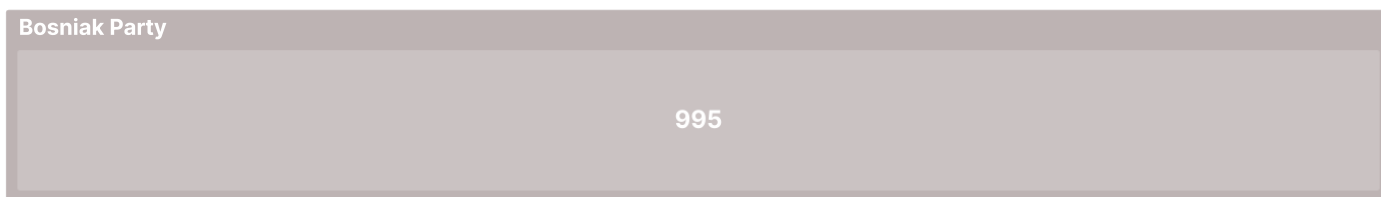


Chart 50: Participation of electoral lists in free media coverage on TV Rožaje

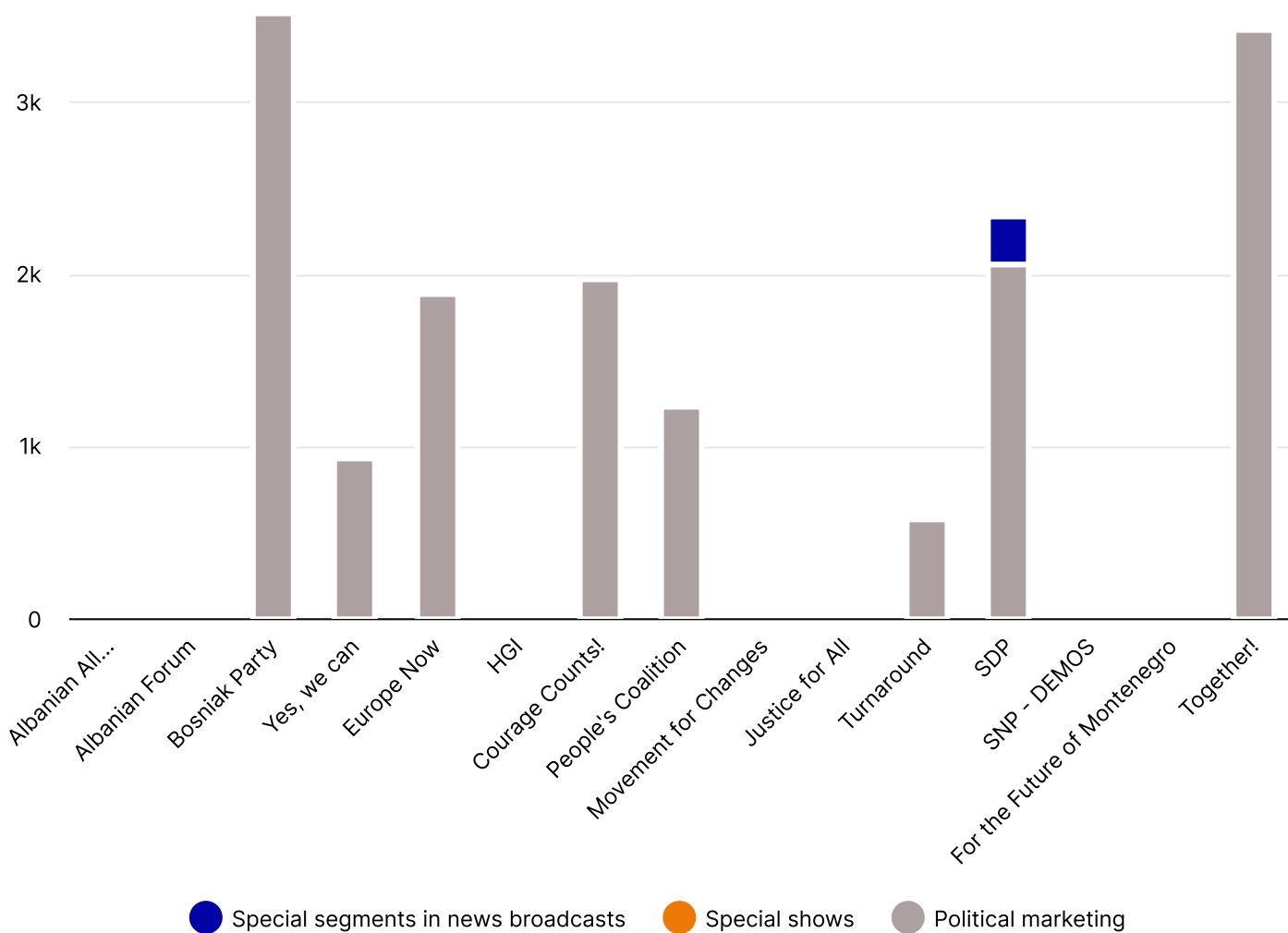
Although public broadcasters are prohibited from paid marketing, the Bosniak Party was advertised on TV Rožaje.



Participation of electoral lists in paid media coverage on TV Rožaje

Free media coverage on TV Rožaje is almost exclusively related to political marketing, with the exception of SDP, whose activities were reported in the news program.

Chart 5: Types of media coverage on Rožaje TV, by electoral lists



2.3. Commercial broadcasters

Half of the total time spent on free media coverage on Prva TV refers to the **ZBCG coalition**, in second place is the coalition of Democrats and URA with around 20%, in third place is SDP with 12%, then the Movement for Changes with 6%.

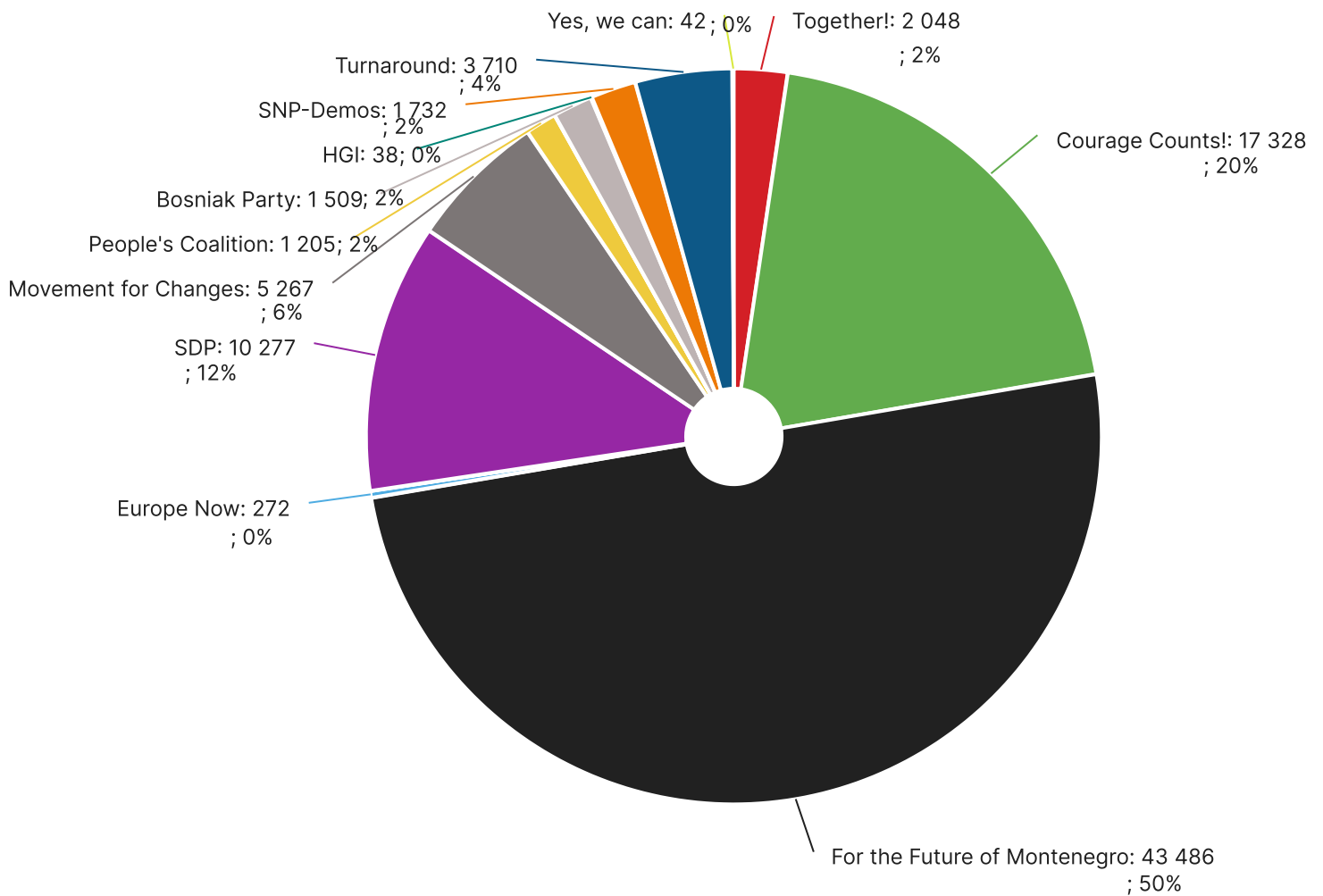
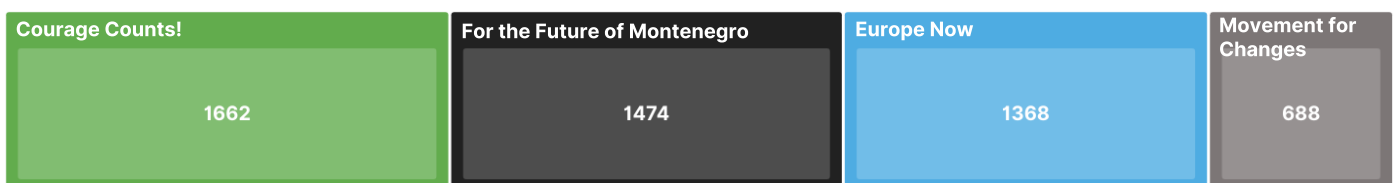


Chart 52: The structure of free media coverage on Prva TV

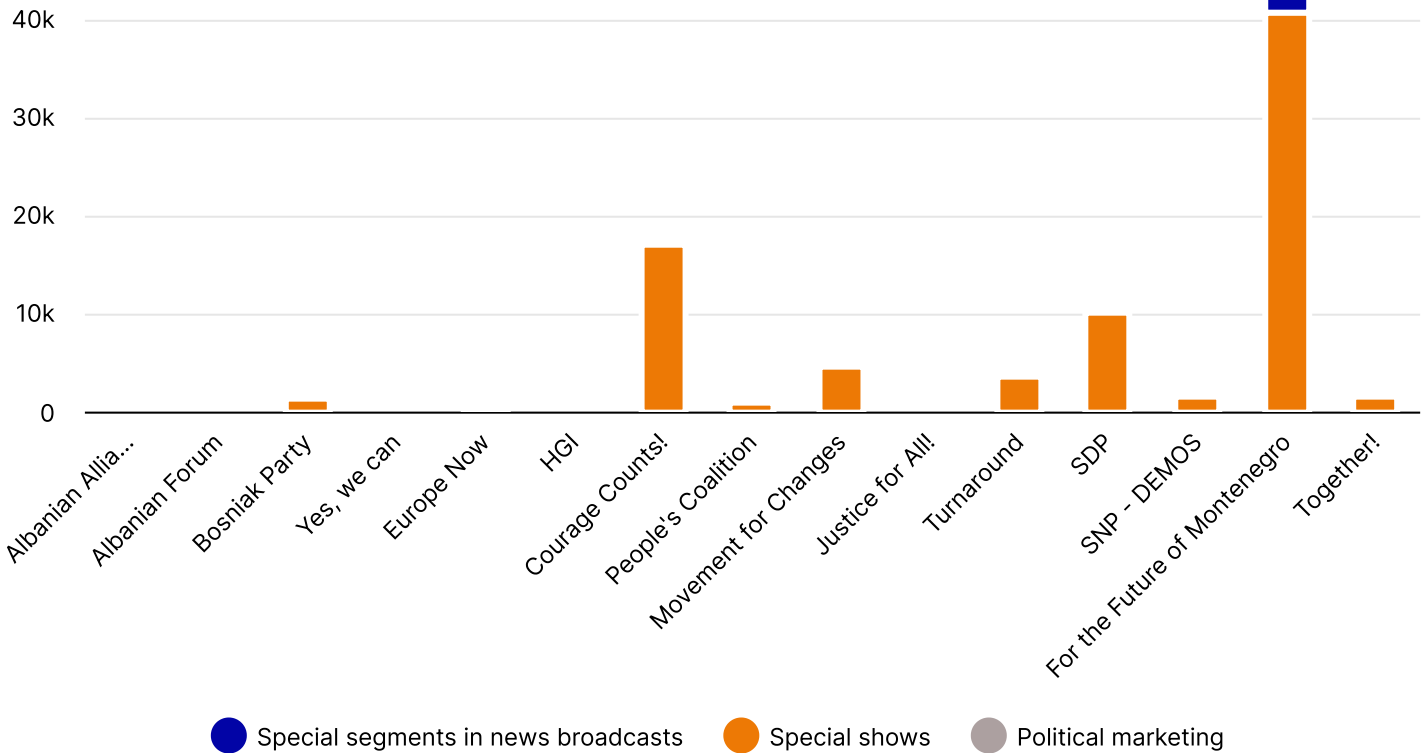
Most of the paid media space on that TV station refers to the coalition of URA and the Democrats (32%), somewhat less to ZBCG (29%), Europe Now 26%, and the Movement for Changes with 13%.



The structure of paid media coverage on Prva TV

The largest part of the free media coverage was through special shows dedicated to the elections, in which the ZBCG coalition was predominant, while the coalition of Democrats and URA, and SDP also had a somewhat more space.

Chart 53: Types of media coverage on Prva TV, by electoral lists



Srpska TV gave by far the most space to the ZBCG coalition - 77%, in second place is the coalition of Democrats and URA, as well as DPS with 6% each.

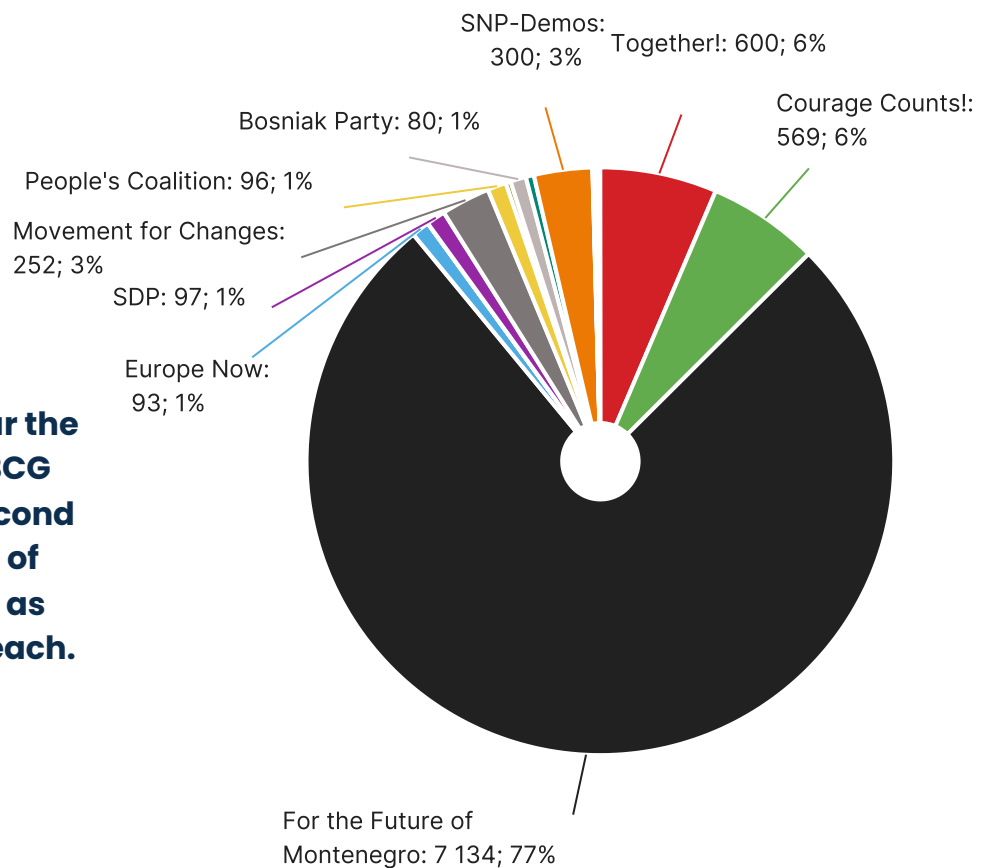
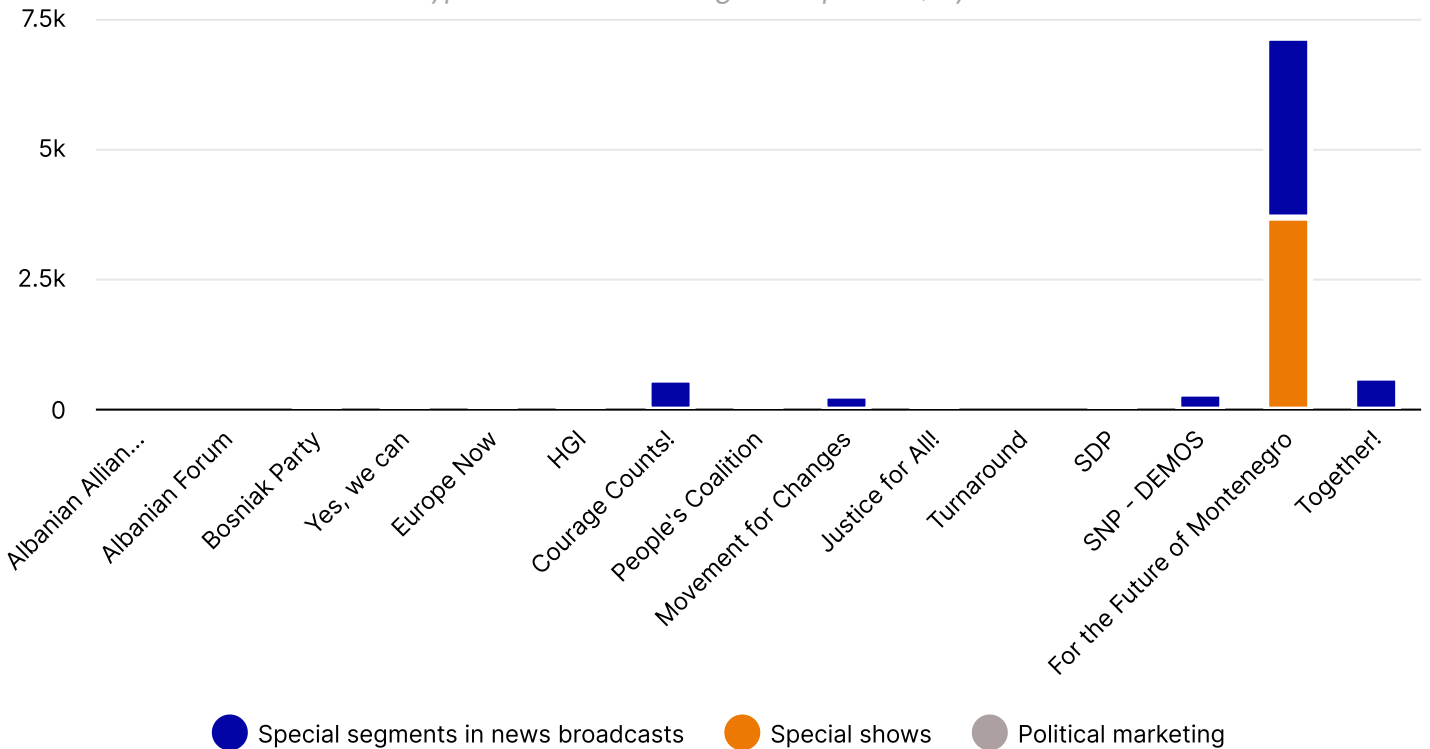


Chart 54: Participation of electoral lists in free media coverage on Srpska TV

This TV station had no paid political marketing.

The largest part of free advertising on this TV station refers to special segments in news broadcasts, where ZBCG was predominant. That coalition was the only one that participated in special shows dedicated to the elections.

Chart 55: Types of media coverage on Srpska TV, by electoral lists



When it comes to free coverage, TV 7 predominantly advertised the coalition around DPS (27%), in second place were Europe Now and SNP with 14% each, and Turnaround with 10%.

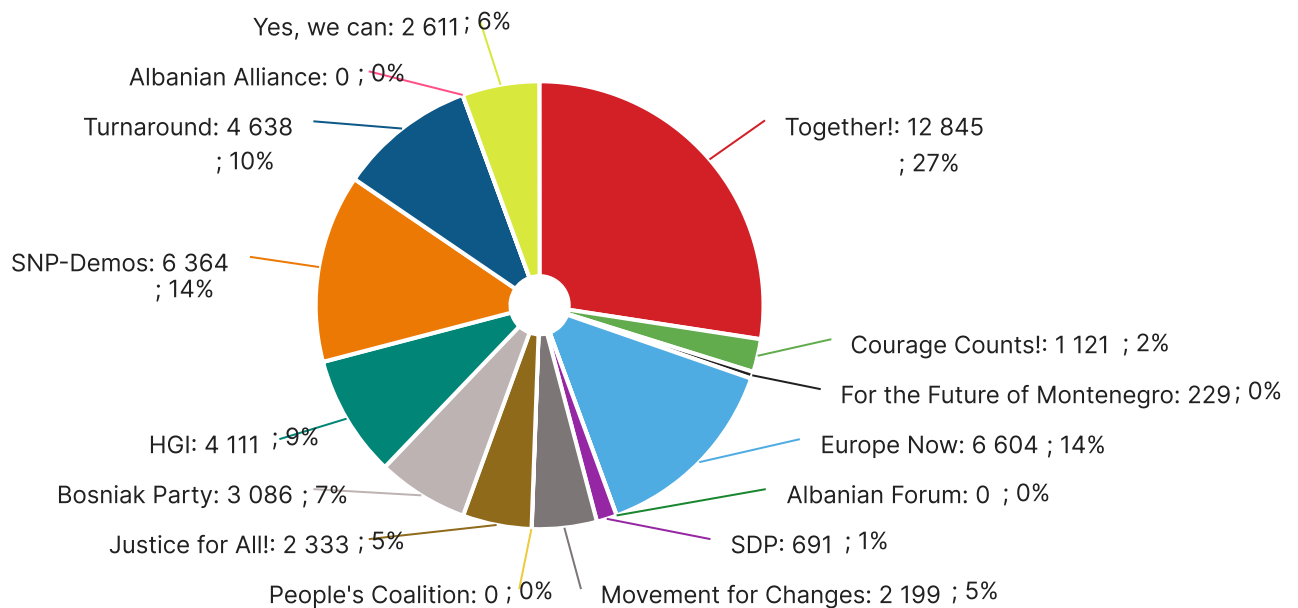
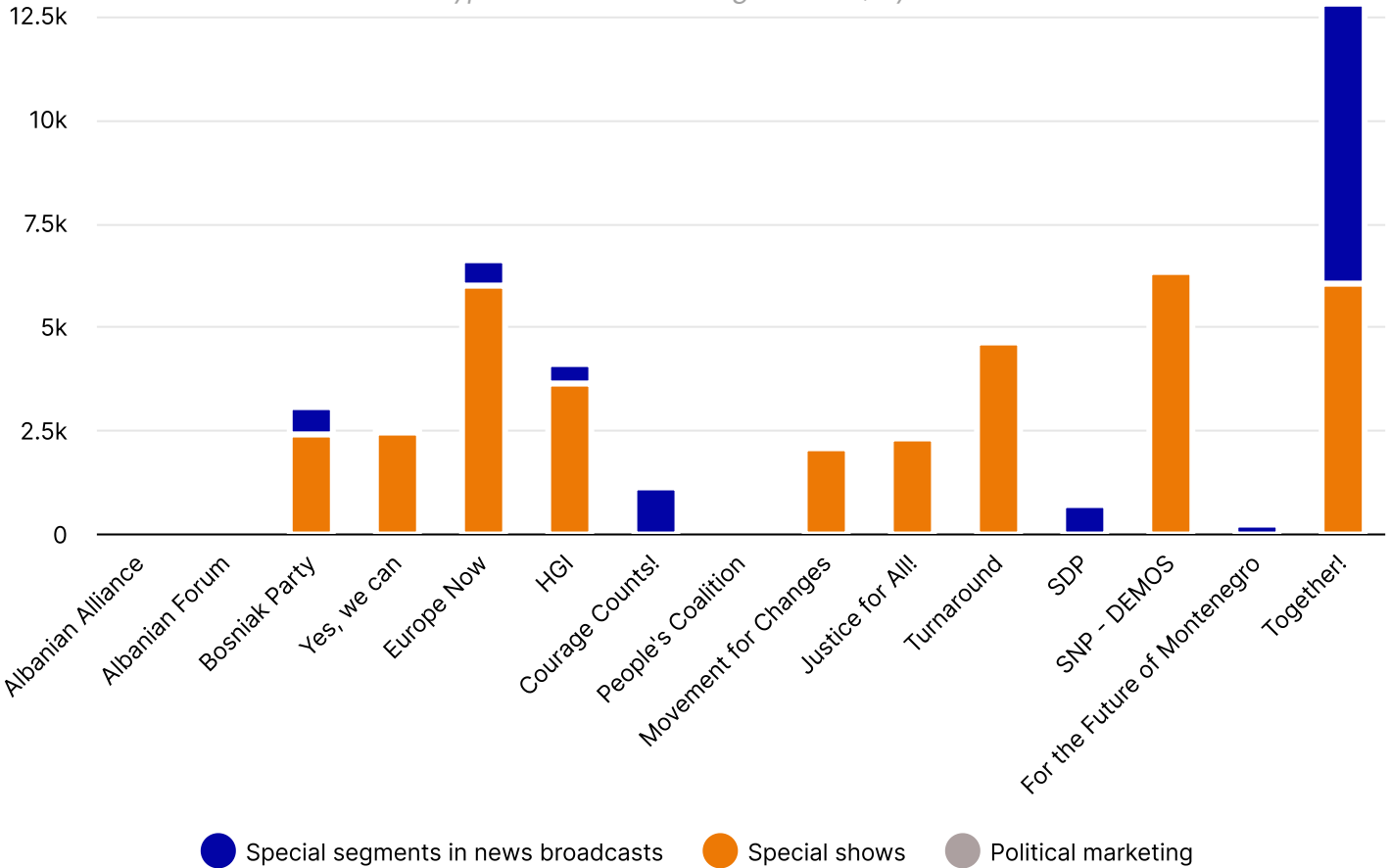


Chart 56: Participation of electoral lists in free media coverage on TV 7

This TV station also had no paid political marketing.

The largest part of the free marketing related to special shows dedicated to the elections, where SNP, Europe Now, DPS and Turnaround got the most space. When it comes to special segments in news broadcasts, DPS had more space than all the other lists combined.

Chart 57: Types of media coverage on TV 7, by electoral lists



Within free coverage, TV A plus gave the most space to the coalition of Democrats and URA, around 23%, in second place was ZBCG with 19%, followed by Movement for Changes with 17% and SDP with 16%.

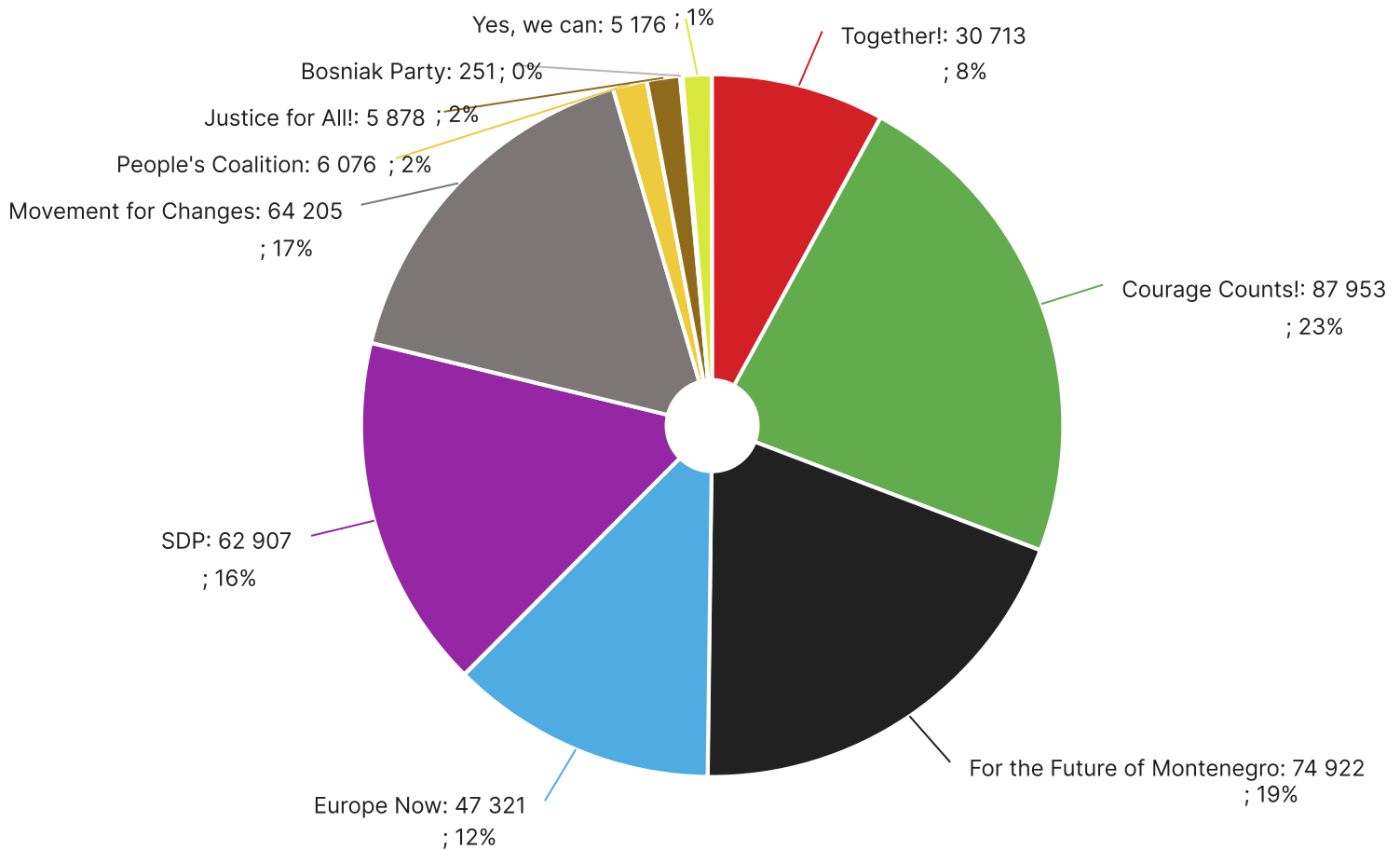


Chart 58: Participation of electoral lists in free media coverage on TV A plus

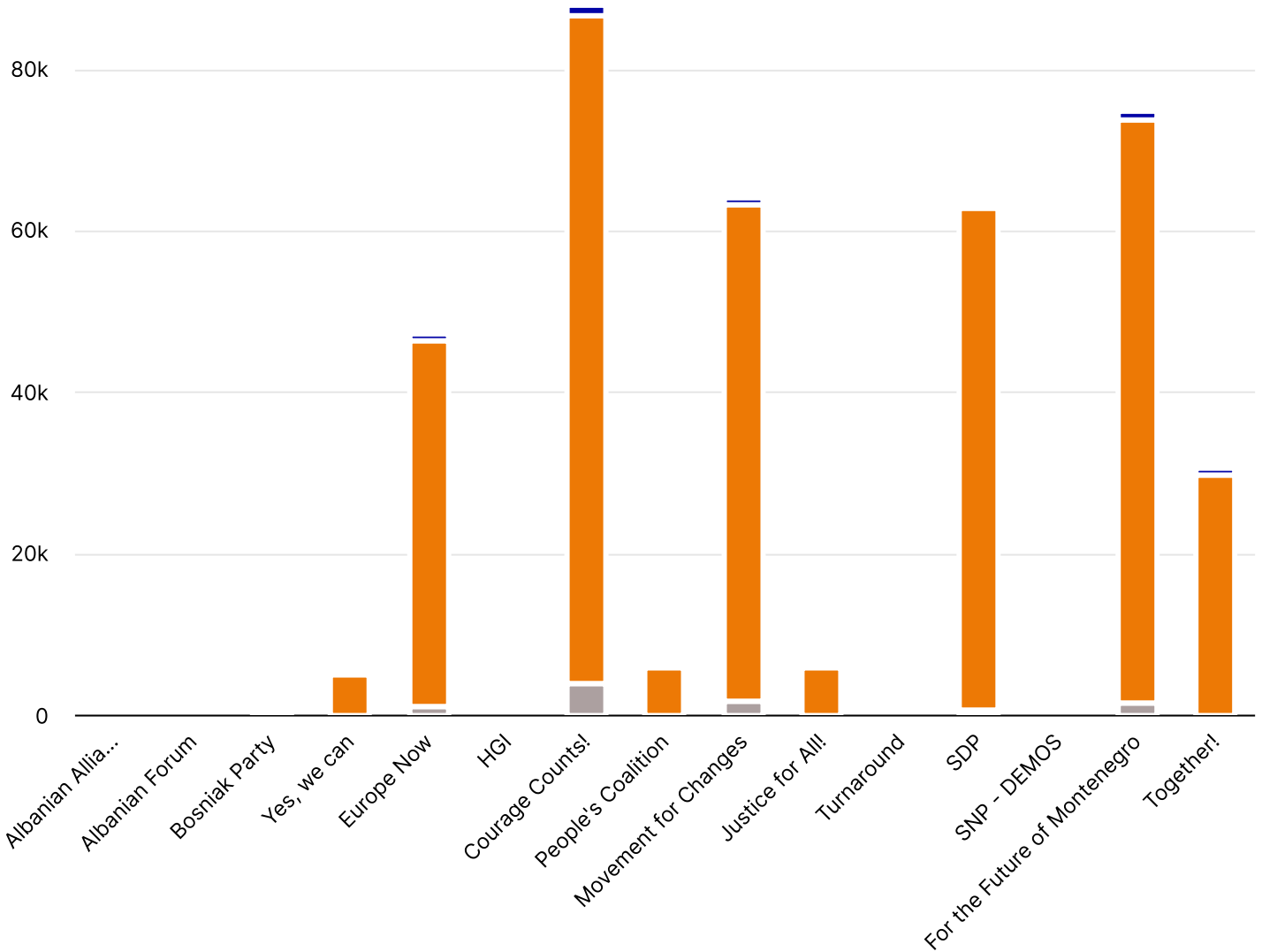
When it comes to paid coverage on TV A plus, half of the space related to the advertising of the coalition of Democrats and URA, Europe Now had almost the same amount of time, while ZBCG and Movement for Changes together accounted for about 4%.



Structure of paid media coverage on TV A plus

This TV station predominantly had special shows in which mainly four lists were presented.

Chart 59: Types of media coverage on TV A plus, by electoral lists



● Special segments in news broadcasts
 ● Special shows
 ● Political marketing

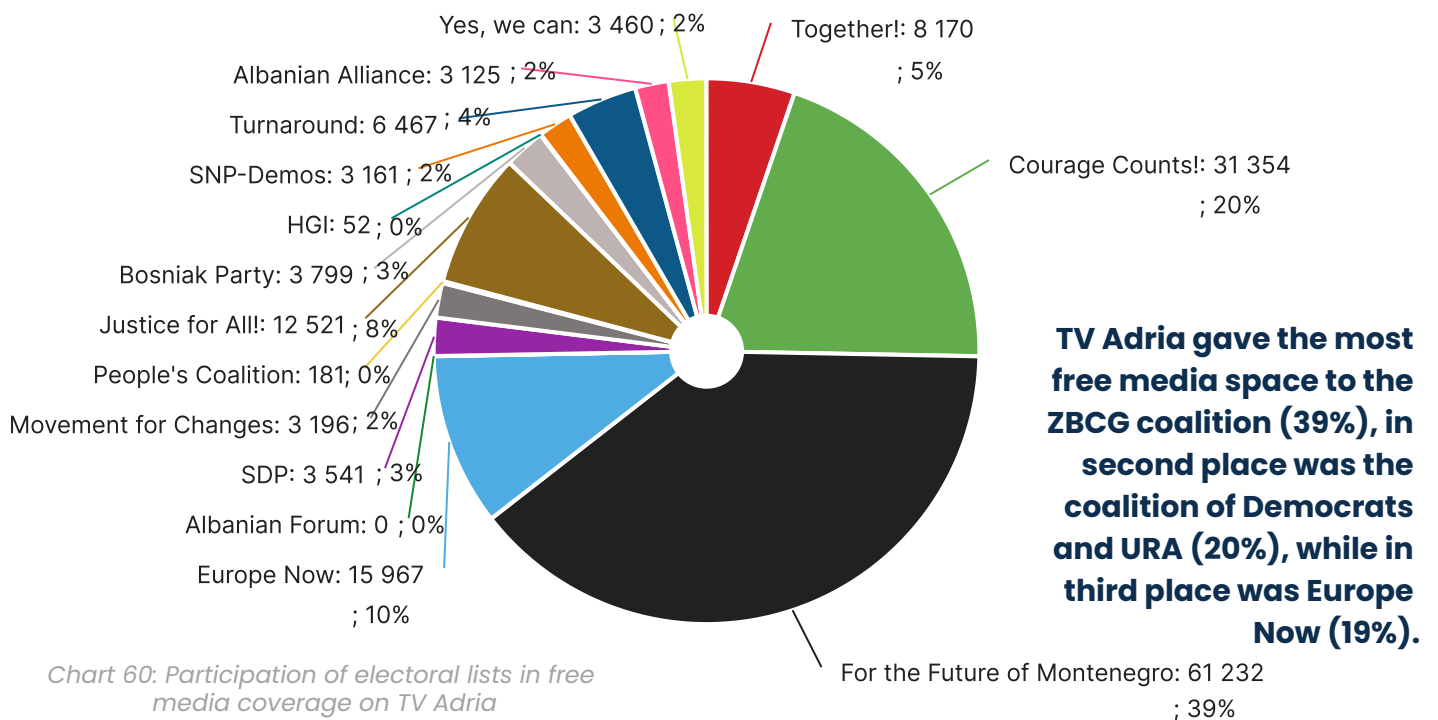


Chart 60: Participation of electoral lists in free media coverage on TV Adria

Only the ZBCG coalition had paid ads on this TV station.

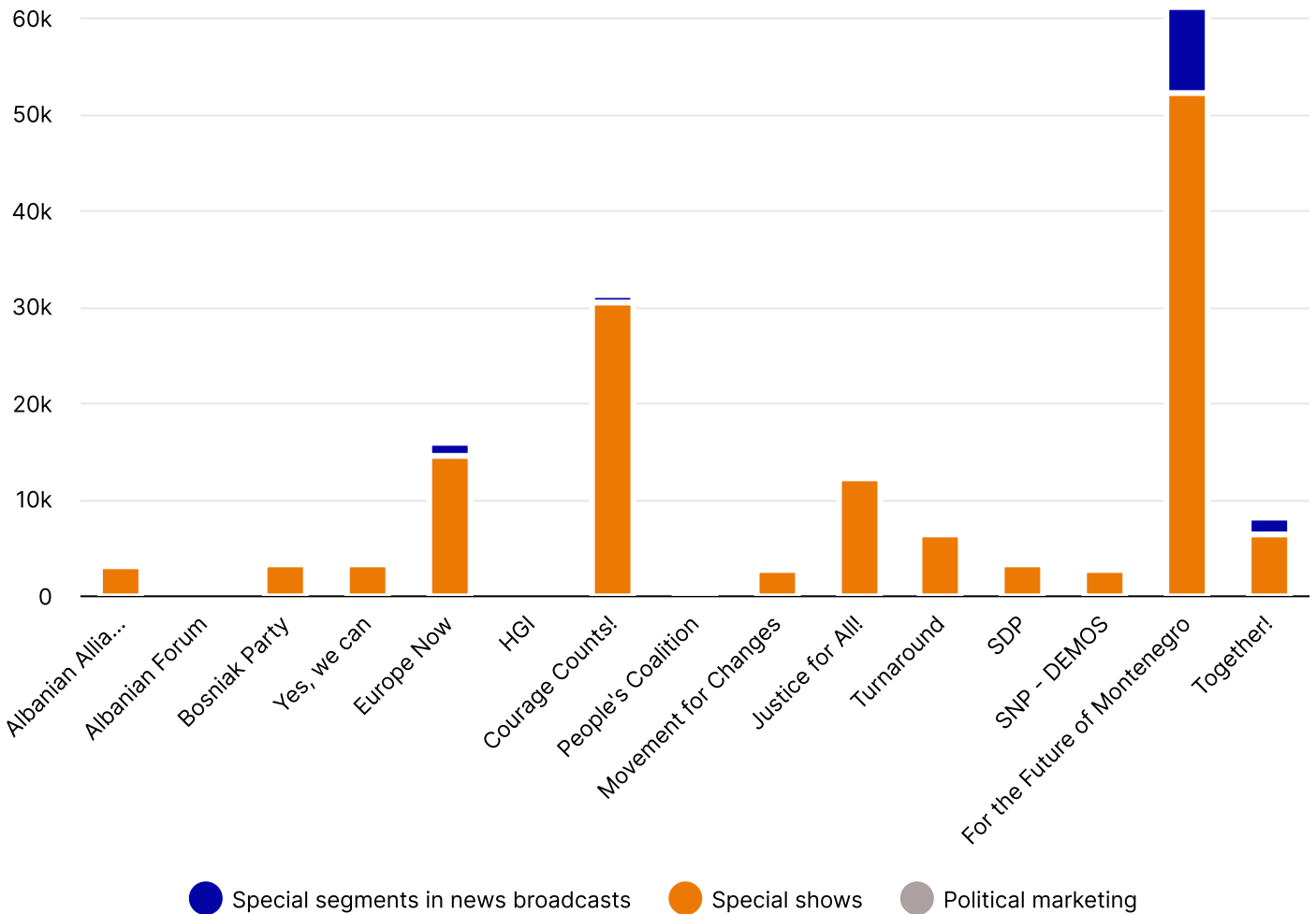
For the Future of Montenegro

4764

Structure of paid media coverage on TV Adria

This TV station also predominately had **special shows** in which ZBCG was mainly represented, and the coalition of **Democrats and URA and Europe Now to some extent**, while the other lists were less represented.

Chart 61: Types of media coverage on TV Adria, by electoral lists



When it comes to free media coverage, TV E advertised the coalition around DPS the most (35%), Europe Now (11%) was in second place, and ZBCG (9%) was in third place.

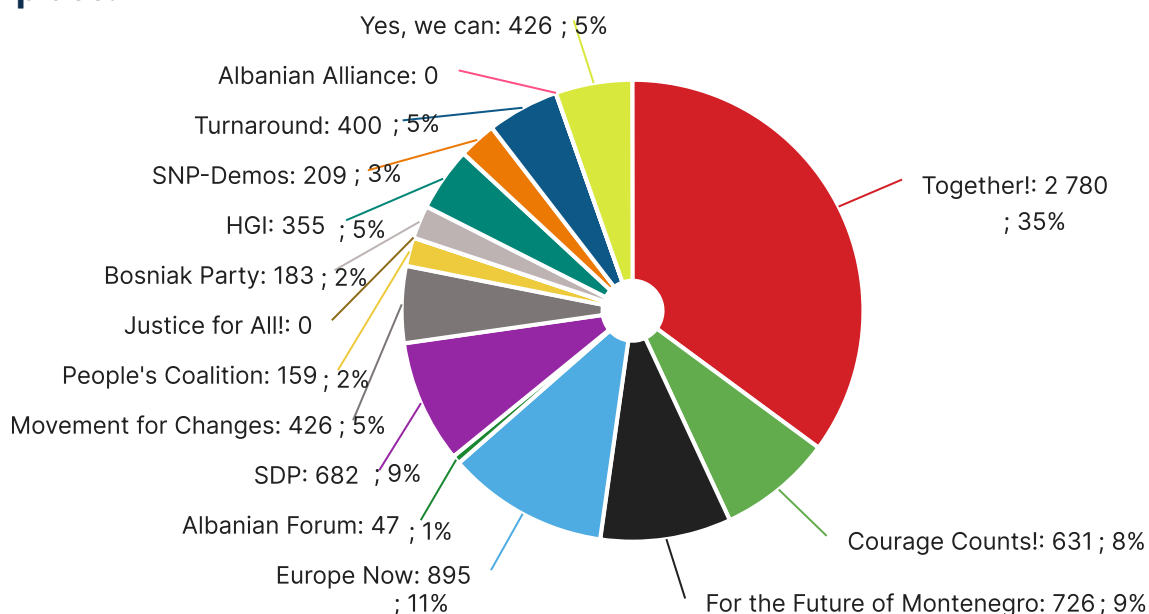
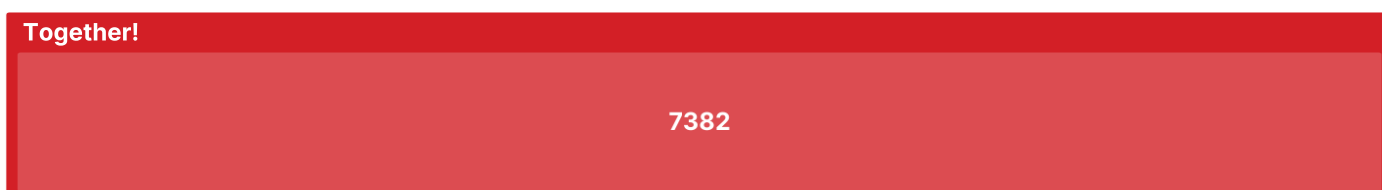


Chart 62: Participation of electoral lists in free media coverage on TV E

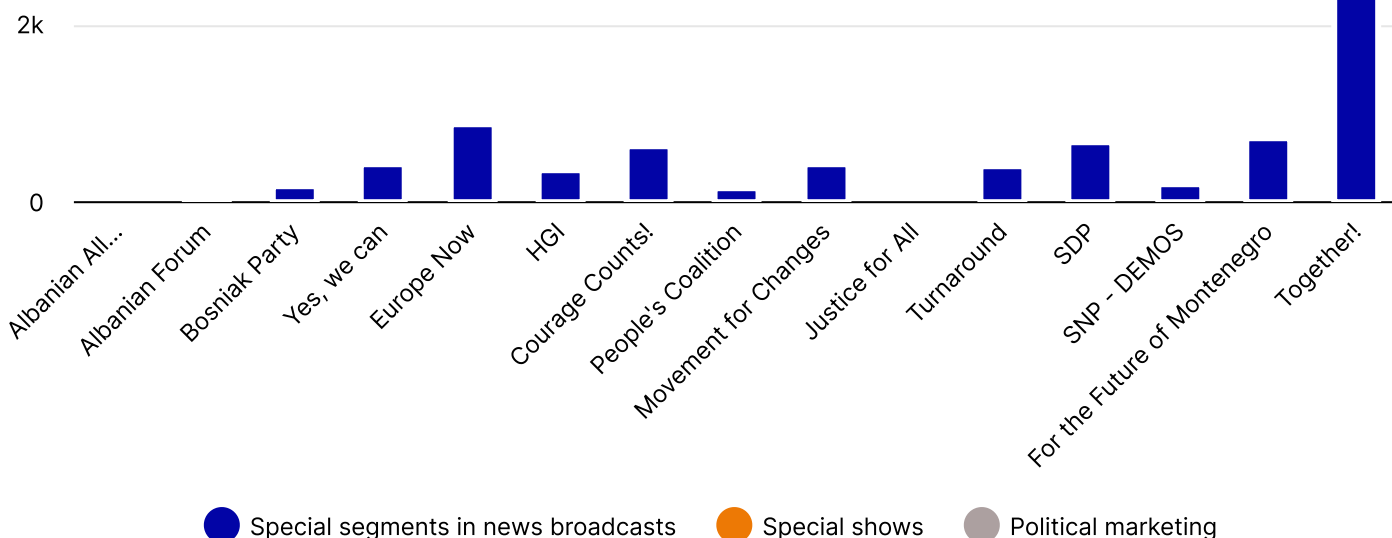
Only the coalition gathered around DPS had paid advertisements on that TV station.



The structure of paid media coverage on TV E

This TV station did not report that it had a single special show dedicated to the elections, thus the free media coverage refers exclusively to special segments in news broadcasts.

Chart 63: Types of media coverage on TV E, by electoral lists



TV Nova M advertised the coalition gathered around DPS the most (19%), in second place are ZBCG and the coalition of Democrats and URA with 13%, followed by Europe Now with 11%.

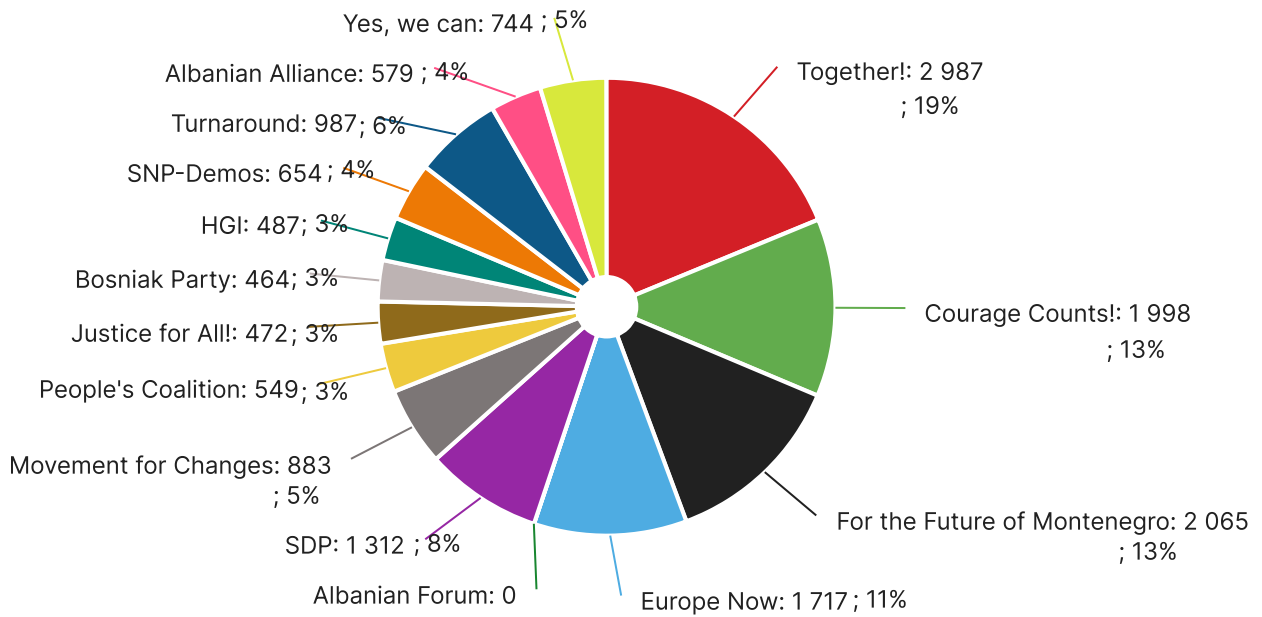
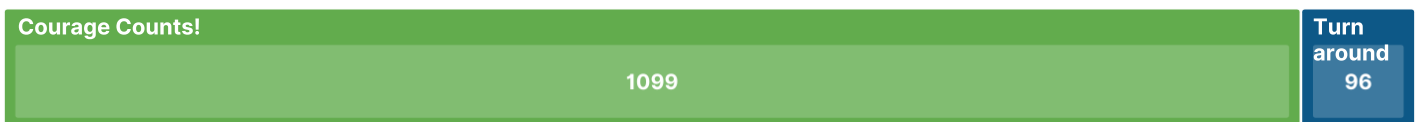


Chart 64: Participation of electoral lists in free media coverage on TV NOVA M

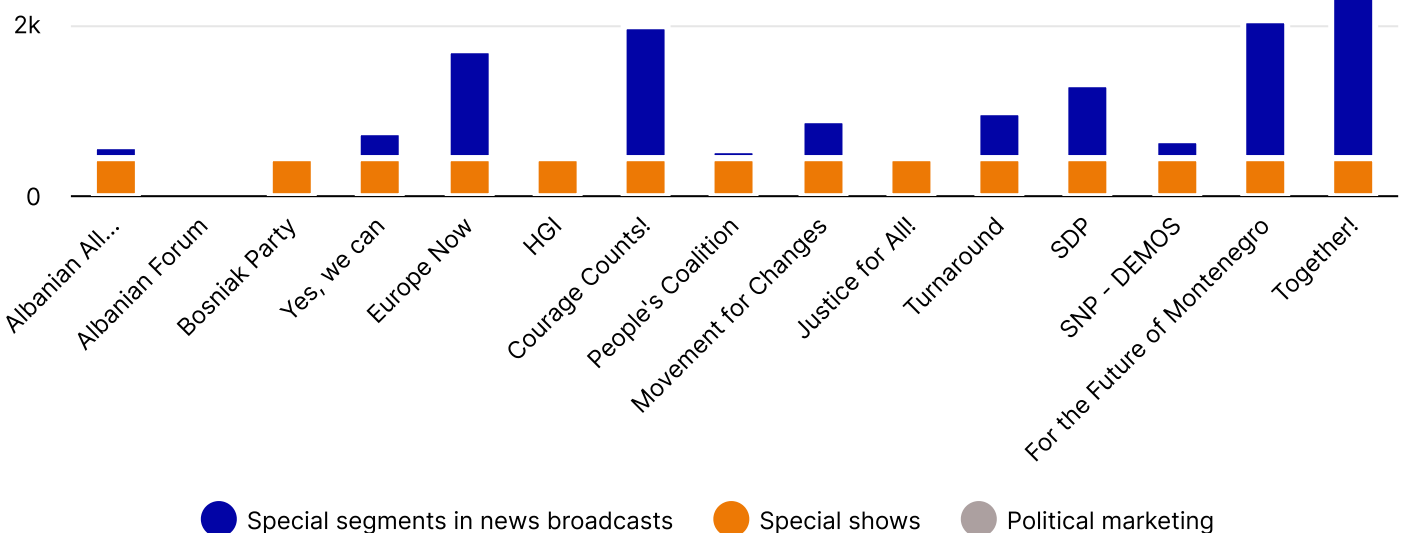
The coalition of Democrats and URA had paid advertisements on this TV station (92%), and the rest refers to Turnaround.



Structure of paid media coverage on TV NOVA M

The largest part of free media advertising on this TV station refers to special segments in news broadcasts where the coalition around DPS, ZBCG, the coalition of Democrats and URA and Europe Now were predominant. Almost all lists were equally represented in special shows.

Chart 65: Types of media coverage on NOVA M, by electoral lists



TV Teuta devoted half of its free media space to the Albanian Alliance, followed by the Albanian Forum (43%), the coalition around DPS (4%), and Europe Now (3%).

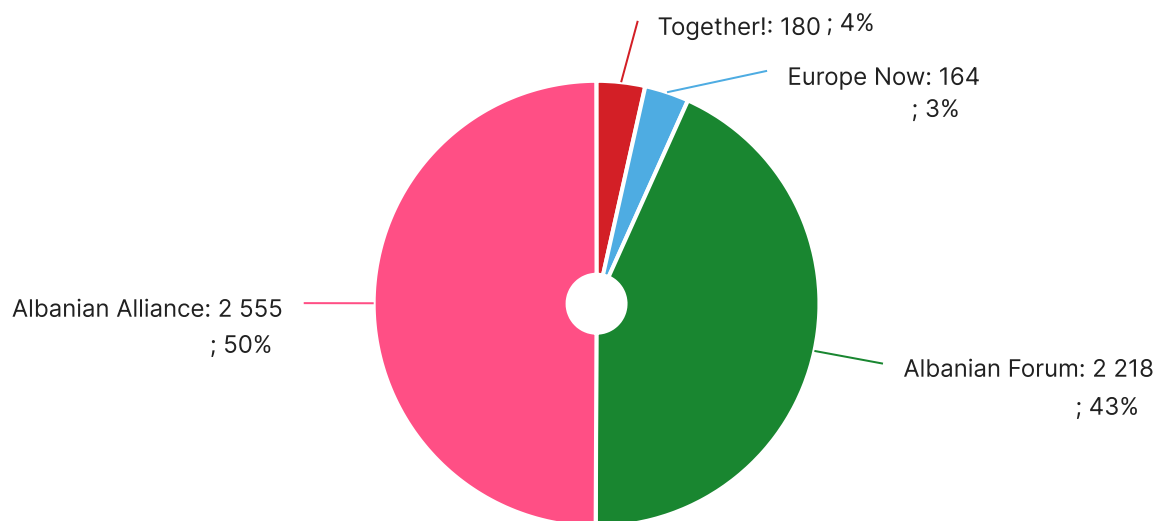


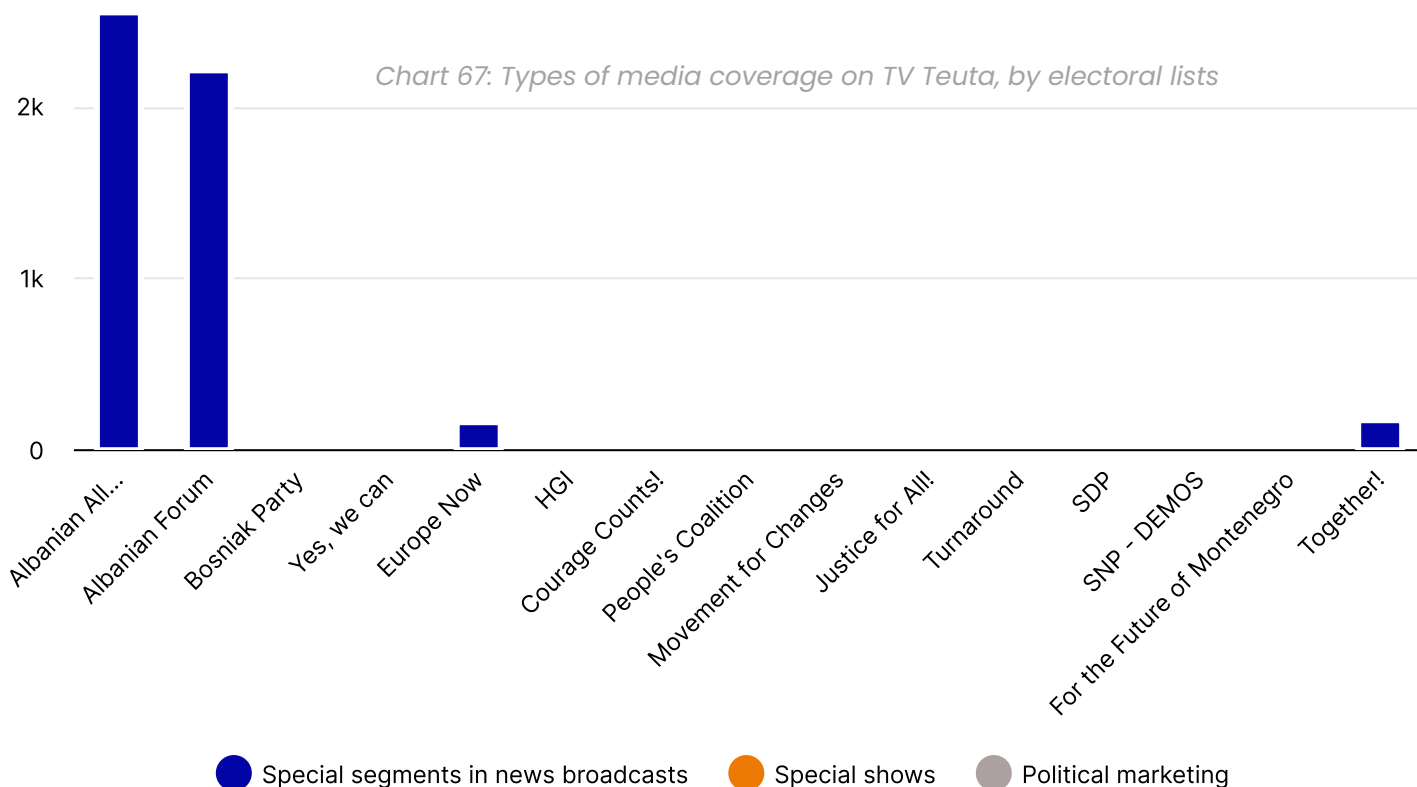
Chart 66: Participation of electoral lists in free media coverage on TV Teuta

The Albanian Alliance (66%) and the Albanian Forum (34%) had paid ads on that TV station.



The structure of paid media coverage on TV Teuta

All free media advertising related to **special segments in news broadcasts**.



TV Vijesti gave the most free space to the coalition around DPS and Europe now, 24% each, i.e. to the coalition of Democrats and URA and ZBCG – about 23% each.

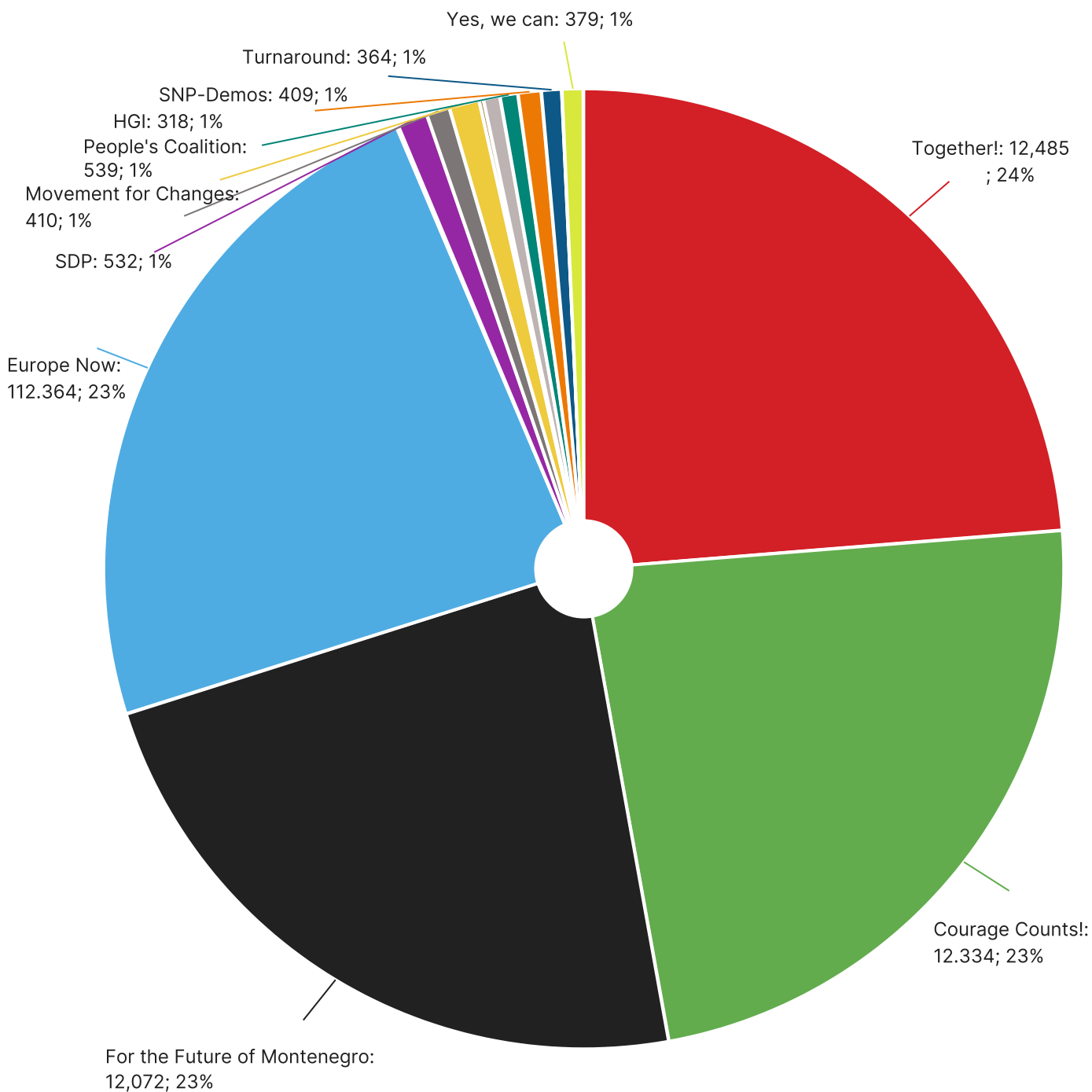


Chart 68: Participation of electoral lists in free media coverage on TV Vijesti

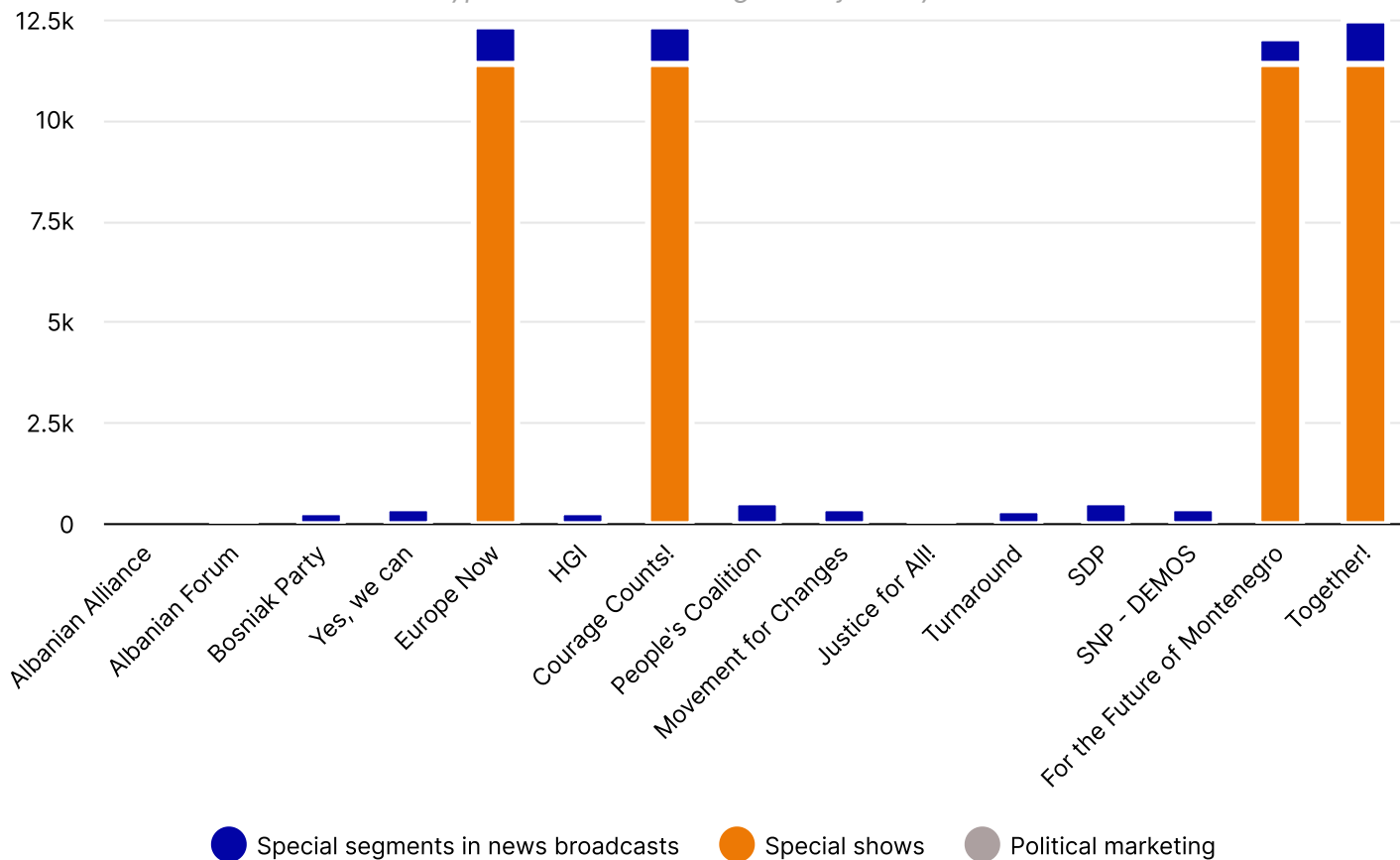
Europe Now had the most paid advertisements (30%) on this TV station, followed by the coalition of Democrats and URA (23%), the People's Coalition (16%) and SDP (10%).



The structure of paid media coverage on TV Vijesti

The largest part of free media advertising related to **special shows where four electoral lists were predominant.**

Chart 69: Types of media coverage on Vijesti, by electoral lists



Overview of free and paid advertising by electoral lists

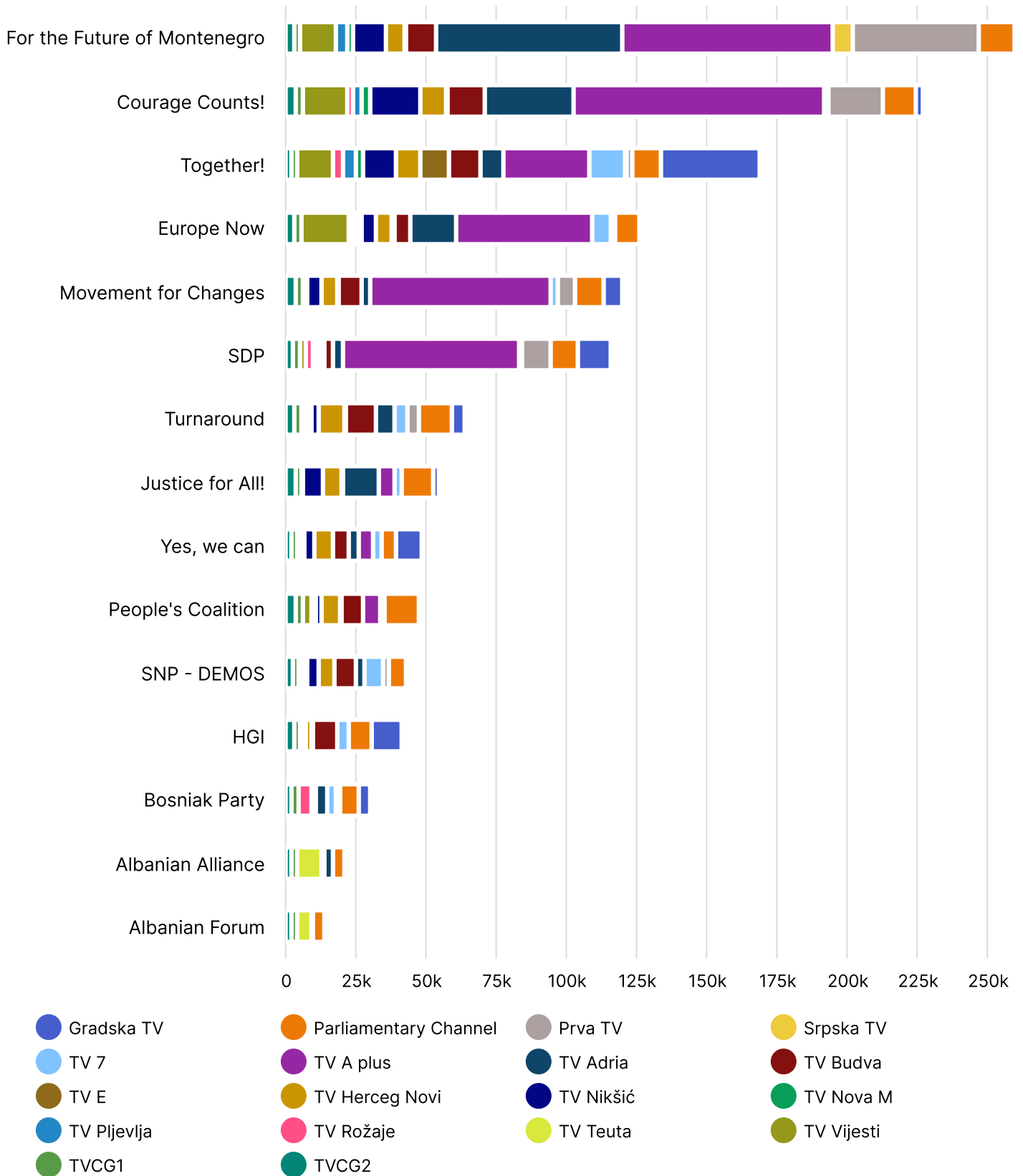


Chart 70: Duration of free and paid media coverage of all electoral lists on Montenegrin TV stations

MONITORING OF PUBLIC SPENDING DURING THE ELECTION CAMPAIGN

3.

3.1. Increases in public spending during the election campaign

During the three-month election campaign, 45 state institutions spent more than the plan established by the Ministry of Finance. Some institutions increased their spending multiple times, while payments to natural person from the budget reserve also increased.

The legal restriction that institutions may not spend more than the spending plan determined by the Ministry of Finance has become meaningless because that plan was changed every month during the election campaign.

Monitoring the implementation of that restriction was made impossible by the practice of several institutions to declare their transactions secret.

According to the Law on Financing of Political Entities and Election Campaigns, institutions shall be prohibited from monthly spending plan established by the Ministry of Finance (Article 38 paragraph 2).

The spending plan of state institutions, published by the Ministry of Finance as the competent institution, is available in the library on the website of the Government of Montenegro in the part of the organizational unit - the Ministry of Finance. [65]

We monitored the spending of all 87 budgetary spending units, of which 45 increased spending during the election campaign, mostly in June, the month when the elections were held.

[65] Available at : <https://www.gov.me/dokumenta/785a8018-fb53-44e8-b105-9b610b31e90e> .

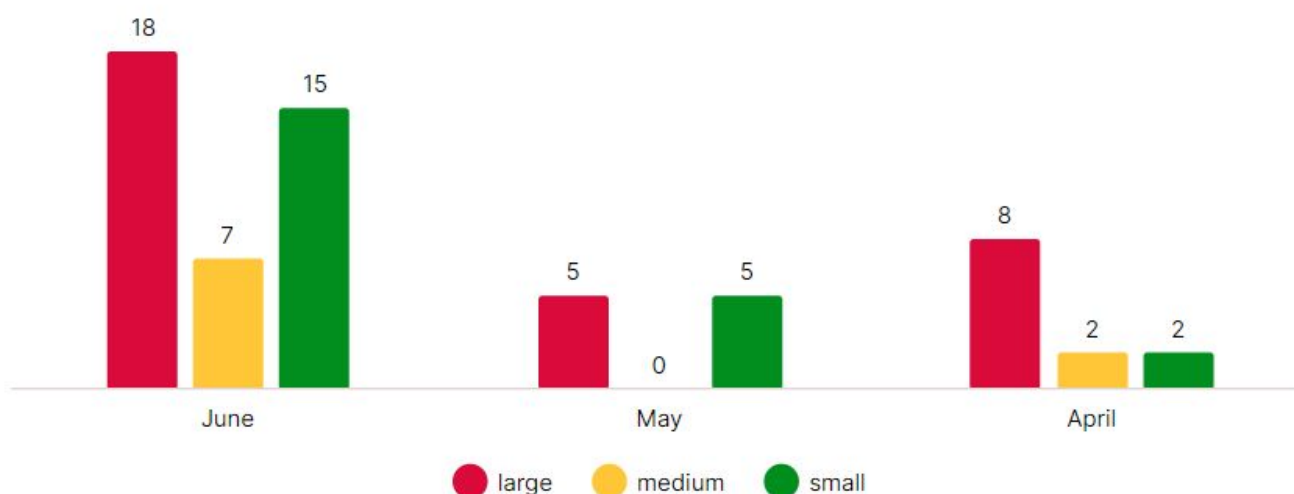


Chart 71: Number of institutions that had large, medium and small increases in budget spending compared to the plan during the election campaign, by months (April, May, June)

During the election campaign, many state institutions spent significantly higher amounts than those foreseen in the plan, as shown in the table below.

Budgetary spending unit	Increase in spending in June	% increase	Increase in spending in May	% increase	Increase in spending in April	% increase
Ministry of Science and Technological Development	3,123,286	7,520%	1,706,767	3,156%	(962,826)	-91%
Pension and Disability Insurance Fund	3,034,850	7%	(882,789)	-2%	5,376,305	12%
Revenue and Customs Administration	2,027,923	142%	(801,297)	-56%	86,789	6%
Ministry of the Interior	2,015,554	23%	(388,352)	-4%	(967,621)	-11%
State Election Commission	1,328,326	3,689%	(10,385)	-29%	1,148,810	3190%
Ministry of Labour and Social Welfare	1,141,880	6%	(571,183)	-3%	2,883,273	16%
Employment Agency	932,824	24%	318,804	8%	750,269	19%
Institute for the Execution of Criminal Sanctions	774,336	75%	(495,002)	-48%	(68,149)	-7%
Ministry of Finance	727,037	3%	(521,652)	0%	(3,762,258)	-9%
Judicial Council	639,794	27%	(1,226,895)	-53%	1,672,655	71%
Ministry of Public Administration	579,590	105%	913,166	167%	(1,158,215)	-75%
Prosecutorial Council	555,653	62%	(602,870)	-67%	9,011	1%
Ministry of Culture and Media	502,119	26%	(871,545)	-42%	(836,828)	-44%
Health Insurance Fund	354,944	1%	(465,420)	-2%	(1,195,286)	-4%
Administration for Managing Forests and Hunting Grounds	281,802	58%	(325,742)	-67%	(48,961)	-10%

Budgetary spending unit	Increase in spending in June	% increase	Increase in spending in May	% increase	Increase in spending in April	% increase
Ministry of Health	244,757	82%	34,509	11%	(178,219)	-58%
Secretariat-General of the Government of Montenegro	140,562	44%	2,677	1%	3,883	1%
Nature and Environment Protection Agency	102,231	64%	18,661	12%	149,440	93%
Institute of Hydrometeorology and Seismology	99,855	81%	(65,174)	-49%	8,177	6%
Bureau for Education Services	90,380	72%	(1,039)	-1%	(264)	0%
Montenegrin Academy of Sciences and Arts	84,585	47%	(18,441)	-10%	(26,603)	-15%
Administration for Maritime Safety and Port Management	68,738	74%	(41,267)	-45%	8,401	10%
Ministry of Human and Minority Rights	63,508	43%	(30,705)	-20%	775	1%
Ministry of European Affairs	53,446	45%	3,844	3%	70,290	55%
Statistical Office of Montenegro	53,137	25%	(18,232)	-8%	48,856	23%
Administration for Inspection Affairs	36,337	7%	(9,892)	-2%	173,691	33%
Constitutional Court of Montenegro	33,331	32%	(76,572)	-75%	(27,954)	-27%
Ministry of Capital Investments	31,428	6%	(97,126)	-18%	(158,589)	-30%
Agency for Prevention of Corruption	21,597	15%	(29,529)	-19%	(70,342)	-34%
Regional Diving Centre for Divers' Training and Underwater Demining	19,823	52%	(28,712)	-75%	(4,506)	-12%
Centre for Vocational Education	16,120	28%	943	2%	(2,503)	-4%
State Archives	15,740	9%	(6,785)	-4%	(12,383)	-7%
Agency for Control and Quality Assurance of Higher Education	15,017	51%	(25,153)	-85%	15,823	54%
Agency for Personal Data Protection and Free Access to Information	12,638	19%	25,008	38%	6,133	9%
Agency For Peaceful Settlement Of Labour Disputes	8,865	26%	(16,959)	-50%	(3,811)	-11%

Budgetary spending unit	Increase in spending in June	% increase	Increase in spending in May	% increase	Increase in spending in April	% increase
Compensation Fund	7,876	19%	(27,113)	-65%	(26,885)	-64%
Centre for Alternative Settlement of Disputes	7,767	36%	(14,922)	-60%	(3,580)	-12%
National Commission for Investigation of aircraft accidents and serious incidents, extraordinary events endangering safety of railroad traffic, and maritime incidents and accidents	3,685	69%	(1,279)	-22%	(143)	-3%
Institute for Social and Child Protection	2,959	12%	6,526	27%	(2,989)	-12%
Social Council	1,453	26%	(2,267)	-41%	(1,100)	-19%
Protector of Property and Legal Interests of Montenegro	(5,168)	-7%	13,930	19%	(30,794)	-41%
Cabinet of the President of Montenegro	(16,663)	-19%	45,474	52%	(512)	-1%
Ministry of Sports and Youth	(109,754)	-22%	(205,476)	-42%	1,999,755	407%
Ministry of Defence	(286,255)	-6%	129,185	3%	(1,242,029)	-26%
Ministry of Economic Development and Tourism	(781,810)	-45%	381,087	42%	7,597	1%

Table 2: List of institutions that spent more than the plan during the campaign for the 2023 parliamentary elections (the amounts greater than 100,000 i.e. 50% are in red, amounts greater than 50,000 and less than 100,000 are in yellow, as well as increases greater than 30% and less than 50%, while increases greater than 10,000 and less than 50,000, i.e. greater than 10% and less than 30% are in green).

In response to the publication of our data on the increase in spending and filing of the report, the Ministry of the Interior announced that the spending plan was changed every month. [66]

[66] <https://www.portalanalitika.me/clanak/mup-nije-tacno-da-smo-potrosili-vise-od-planiranog-u-periodu-prije-parlamentarnih-izbora-plan-potrosnje-se-svakomjesečno-mijenja>.

3.1.1. Increase in spending of the budget reserve

During April and May 2023, there was a significant increase in spending of the budget reserve compared to the same period of the previous year. The largest part of the increase refers to damages from natural disasters, which were eight times higher during the election campaign than in the same period of the previous year.

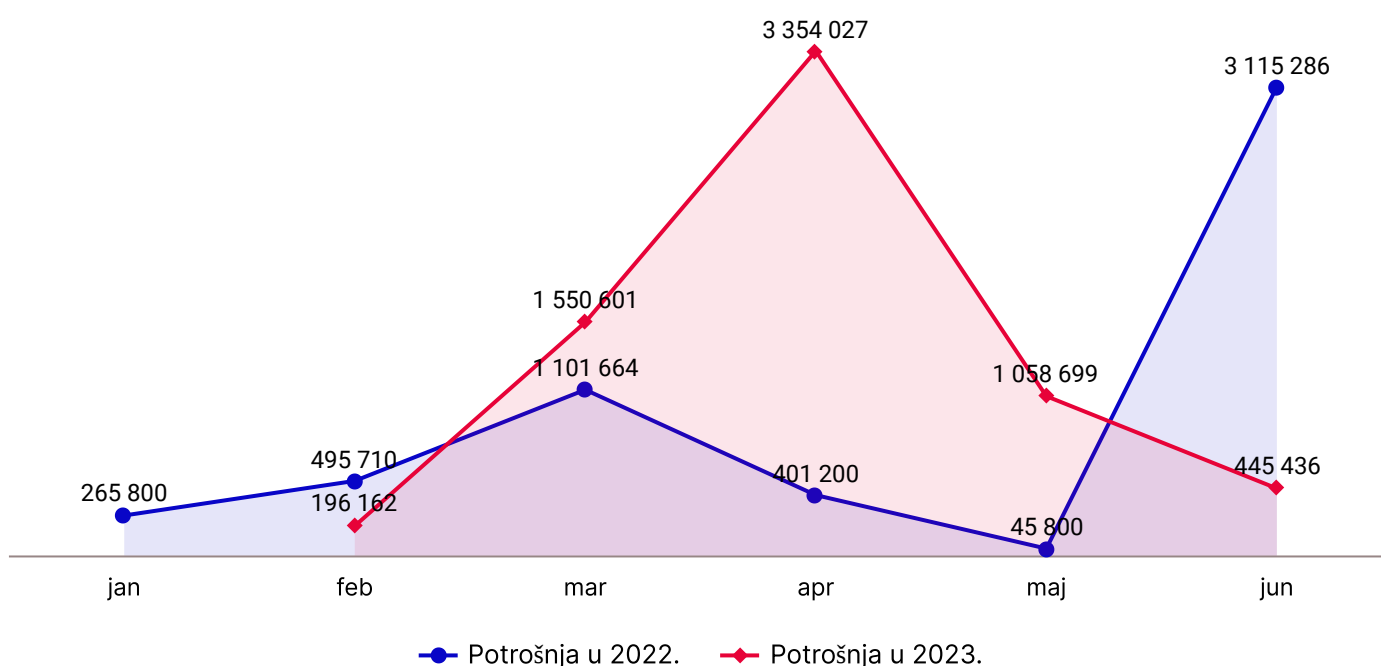


Chart 72: Spending of the budget reserve in the first six months of 2023 and 2022, by months

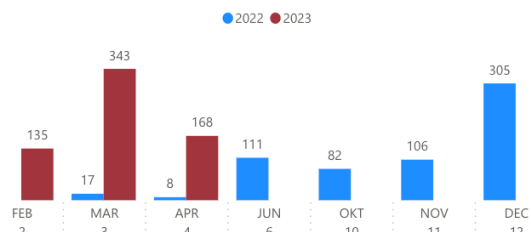
During the pre-election campaign, in March and April this year, the Commission for the Assessment of Damages from Natural Disasters of the Government of Montenegro paid out over 800 thousand euros from the budget reserve on the basis of compensation, which is eight times higher than in the same period last year.

The number of individual payments on this basis was 20 times higher than in the same period of the previous year. Namely, there were 343 payments from the budget in March, 168 in April, while there were 17 payments in March last year, and only 8 in April.

Payments for remediation of damage from natural disasters in 2023 and 2022

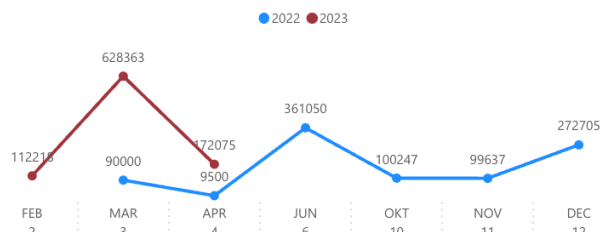
Broj isplata za elementarne nepogode

po mjesecima i godinama



Ukupan iznos isplata za elementarne nepogode

po mjesecima i godinama



Year	Naziv dobavljača	2022						2023		
		3	4	6	10	11	12	2	3	4
	PRVA(NIKSICKA)BANKA	16.000,00		32.150,00	56.233,71	23.895,70	82.817,17	30.548,75	364.216,65	60.005,35
	CRNOGORSKA KOMERCIJALNA BANKA	42.000,00	8.000,00	27.100,00	17.849,00	25.832,20	89.503,49	42.176,05	60.022,98	59.604,15
	NLB MONTENEGRO BANKA	5.500,00	1.000,00	20.900,00	7.262,00	14.742,70	35.237,90	20.037,90	115.444,12	20.938,60
	ERSTE (OPORTUNITI) BANKA	500,00		6.600,00	8.274,00	12.116,40	40.939,91	12.607,50	20.077,40	4.135,35
	AGRO MONT D.O.O.ZA PROIZ.TRGOV.I			100.000,00						
	HTP ULCINJSKA RIVIJERA AD			100.000,00						
	HIPOTEKARNA BANKA		500,00	25.500,00	4.215,00	9.467,80	7.285,80	4.705,80	18.991,95	21.058,40
	ADDIKO BANK (HYPO ALPE ADRIA)	10.000,00		2.500,00		12.287,10	8.523,87	850,00	1.703,88	792,80
	LOVCEN BANKA AD PODGORICA	7.000,00		700,00	975,00	1.295,20	7.335,30	1.292,00	8.870,34	580,00
	MESIHAT ISLAMSKJE ZAJEDNICE								27.000,00	
	EPARHIJA BUDIMLJANSKO NIKSICKA			20.000,00						
	VODOVOD I KANALIZACIJA			20.000,00						
	MITROPOLIJA CRNOGORSKO PRIMOR								12.035,88	4.960,00
	PORODIENA FARMA MILJANIC DOO	9.000,00								
	AKADEMIJA ZNANJA DOO				5.438,55					
	STAMBENA ZGRADA STARA BOLNICA			5.000,00						
	ZAPAD BANKA						1.061,20			
	DOO FORTRESS			300,00						
	STARI MOST RIJEKA CRNOJEVICA			300,00						

The money was mostly paid into bank accounts, mostly in Prva Banka, thus, it is not possible to conclude from the data on payments who the final recipient was, except in the case of a few payments to legal entities, specifically to religious communities.

The allocation of funds for natural disasters is decided by a commission headed by Zoran Miljanić, the minister without portfolio in charge of the fight against corruption.

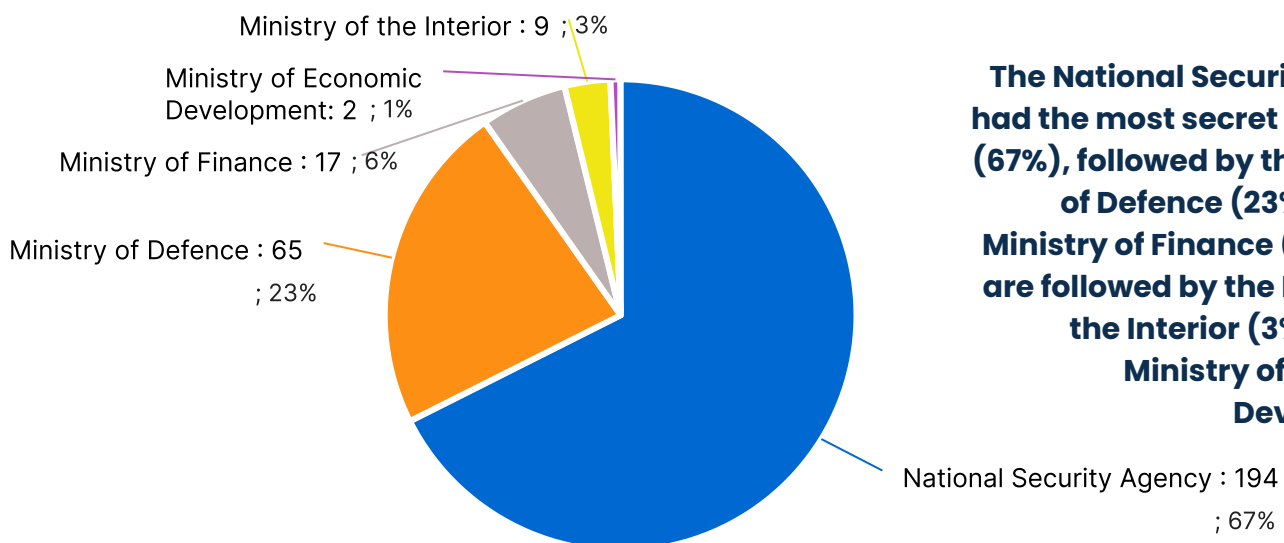
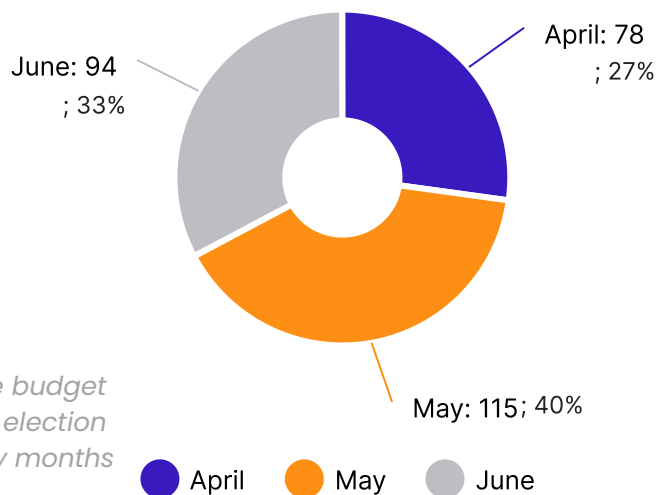
The increase in these payments occurred at the end of last year, after the amendment of Democratic Montenegro banned all other types of payments to natural persons from the budget reserve.

3.1.2. Secret payments from the budget

During the election campaign, there were 287 payments from the budget that were declared secret, thus, the amount of the transaction, as well as the transaction date, description of the account, i.e. the type of expense, as well as the name of the supplier to whom the funds were paid, were hidden.

Institution hiding transactions / month	April	May	June	Total
Agency for National Security	42	86	66	194
Ministry of Defence	26	21	18	65
Ministry of Finances	6	4	7	17
Ministry of the Interior	4	4	1	9
Ministry of Economic Development	-	-	2	2
Total	78	115	94	287

The most secret payments took place in May (115 i.e. 40%), then in June (94 i.e. 33%), and the least in April (78 i.e. 27%).



The National Security Agency had the most secret payments (67%), followed by the Ministry of Defence (23%) and the Ministry of Finance (6%). They are followed by the Ministry of the Interior (3%) and the Ministry of Economic Development.

40065522	4114000000	4114001000	Doprinos za penzijsko i invalidsko osiguranje	JEDINSTVENI RACUN POREZA I DO	752,33	18.04.2023	BUDGET
40065522	4114000000	4114003000	Doprinos za osiguranje od nezaposlenosti	JEDINSTVENI RACUN POREZA I DO	68,40	18.04.2023	BUDGET
40065522	4114000000	4114005000	Doprinos Fondu rada	JEDINSTVENI RACUN POREZA I DO	27,35	18.04.2023	BUDGET
40065525	4115000000	4115001000	Opštinski prirez	PRIREZ NA POREZ PODGORICA	87,43	18.04.2023	BUDGET

40071926	4141000000	4141002100	Dnevnice za službeno putovanje u inostranstvo	CRNOGORSKA KOMERCIJALNA BANKA	284,20	21.04.2023	BUDGET
40071926	4141000000	4141002300	Smjestaj na službenom putovanju u inostranstvu	CRNOGORSKA KOMERCIJALNA BANKA	937,98	21.04.2023	BUDGET
40074263	4127000000	4127000091	Ostale naknade-obaveze	JEDINSTVENI RACUN POREZA I DO	64,33	27.04.2023	BUDGET
40074263	4127000000	4127000091	Ostale naknade-obaveze	JEDINSTVENI RACUN POREZA I DO	145,04	27.04.2023	BUDGET
40074264	4127000000	4127000091	Ostale naknade-obaveze	PRIREZ NA POREZ PODGORICA	12,84	27.04.2023	BUDGET
40080023	4111000000	4111001000	Zarada za redovan rad	NLB MONTENEGRO BANKA	997,57	28.04.2023	BUDGET
40080009	4111000000	4111001000	Zarada za redovan rad	HIPOTEKARNA BANKA	1.855,13	28.04.2023	BUDGET
40079992	4111000000	4111001000	Zarada za redovan rad	CRNOGORSKA KOMERCIJALNA BANKA	8.571,76	28.04.2023	BUDGET
40077020	4127000000	4127000090	Ostale naknade-neto	NLB MONTENEGRO BANKA	396,50	28.04.2023	BUDGET

Naziv kor.budžeta MF-Regulisanje finansijskog sistema

*Overview of hidden transactions of the budget spending unit – the Ministry of Finance, in April 2023
(a complete document with payments from the State Treasury is available on the website
of the Government of Montenegro)*

40102115	4111000000	4111001000	Zarada za redovan rad	SINDIKAT ANB	3,378.31	31.05.2023	BUDGET
40102121	4111000000	4111001000	Zarada za redovan rad	SINDIKAT BEZBJEDONOSNIH INSTI	965.23	31.05.2023	BUDGET
40102126	4111000000	4111001000	Zarada za redovan rad	CRN.FOND ZA SOLID.STAMB.IZGRA	482.62	31.05.2023	BUDGET
40102506	4111000000	4111001000	Zarada za redovan rad	SINDIKAT ANB	34,970.05	31.05.2023	BUDGET

Naziv kor.budžeta ANB-Aktivnosti usmjerene na očuvanje nac

Naziv kor.budžeta ANB-Modernizacija opreme i adaptacija ob

Overview of payments from the State Treasury published on the website of the Government of Montenegro during May, specifically of the budgetary spending unit – the National Security Agency [68]

[67] Available at: <https://www.gov.me/dokumenta/fcc85c97-18bf-46eb-ac2c-9827d8c8f4bc>.

[68] Available at: <https://www.gov.me/dokumenta/cf6d51c2-accd-4f9e-9d45-3f254924a436>

Payments from the State Treasury during June 2023 are available at: <https://www.gov.me/dokumenta/7bfa4eb0-21ed-4d27-bcd1-d4bc09f1dd94>.

3.2. Employment

The restriction of short-term employment during the pre-election campaign is meaningless in practice, because APC does not conduct adequate control, although specific examples and statistical data indicate that there are abuses.

During three months of the election campaign, over 800,000 euros more was paid from the budget for temporary employment contracts than in the same period of the previous year. Institutions reported that they had concluded 16,706 temporary employment contracts during the campaign, employing 4,755 people.

State-owned companies withhold employment information during the election campaign. The data is provided only by the Montenegro Post, CEDIS, Port of Bar, Railway Infrastructure and Railway Transport of Montenegro, the Coal Mine declared them secret, CGES protects the privacy of employees, while EPCG, the Public Enterprise for Coastal Zone Management of Montenegro and the Airports of Montenegro ignore submitted requests for information.

3.2.1. Reported employment in state and local institutions during the election campaign

Statistical data and specific examples show that the restrictions of short-term employment are meaningless in practice. The institutions reported that they had concluded 16,706 temporary employment contracts during the campaign for the parliamentary elections, employing 4,755 people. APC did not check whether these employments were established as provided for in the acts on systematization, nor whether there were hidden contracts.

Article 44 paragraph 1 of the Law on Financing of Political Entities and Election Campaigns stipulates that state bodies, state administration bodies, local self-government bodies, local administration bodies, public companies, public institutions and state funds, may hire persons under a temporary service contract, only if it has been planned by the act on systematization and job descriptions. That article further stipulates the obligation for those institutions to submit all employment decisions, with supporting documentation, to the Agency for Prevention of Corruption, which is obliged to publish the submitted documents on its website.

Article 44 paragraphs 1, 2 and 3 of the Law on Financing of Political Entities and Election Campaigns:

“In the period from the day of calling until the day of holding of the elections, in exceptional cases for reasons of ensuring smooth and regular functioning of state bodies, state administration bodies, local self- government bodies, local administration bodies, public companies, public institutions and state funds, and based on a decision of the competent body of these entities, persons may be employed for a fixed-term as well as hired under a temporary service contract, only if it has been planned by the act on systematization and job descriptions.”

Bodies and legal entities referred to in paragraph 1 of this Article shall submit all decisions on employment adopted in line with the laws governing labour relations, rights and obligations of civil servants and state employees and contractual relations, **with the complete supporting documentation**, to the Agency within three days from the day of adoption of the decision.

The Agency shall publish the submitted documents referred to in paragraph 2 of this Article on its website within seven days from the day of submission.”

According to the data submitted by the institutions to the Agency for Prevention of Corruption, 16,706 fixed-term employment contracts were concluded during the campaign for the parliamentary elections.

Of these, the most contracts were concluded in Podgorica, i.e. 3,201, 683 in Nikšić, 508 in Bar, 479 in Bijelo Polje, 448 in Pljevlja.

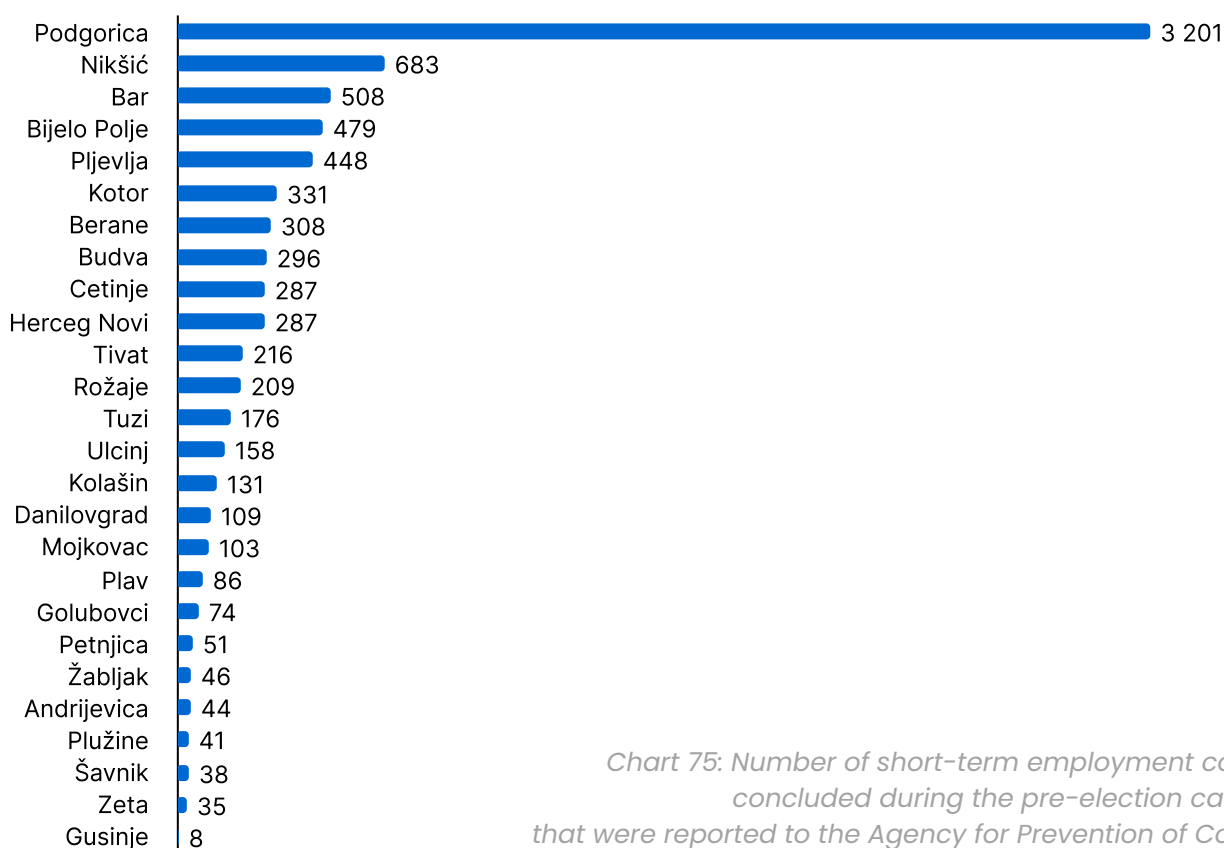


Chart 75: Number of short-term employment contracts concluded during the pre-election campaign that were reported to the Agency for Prevention of Corruption

With some persons, several contracts were concluded, thus, during the pre-election campaign, 4,755 persons reported to APC were hired through short-term employment.

The majority of short-term employment refers to short-term contracts and temporary employment contracts.

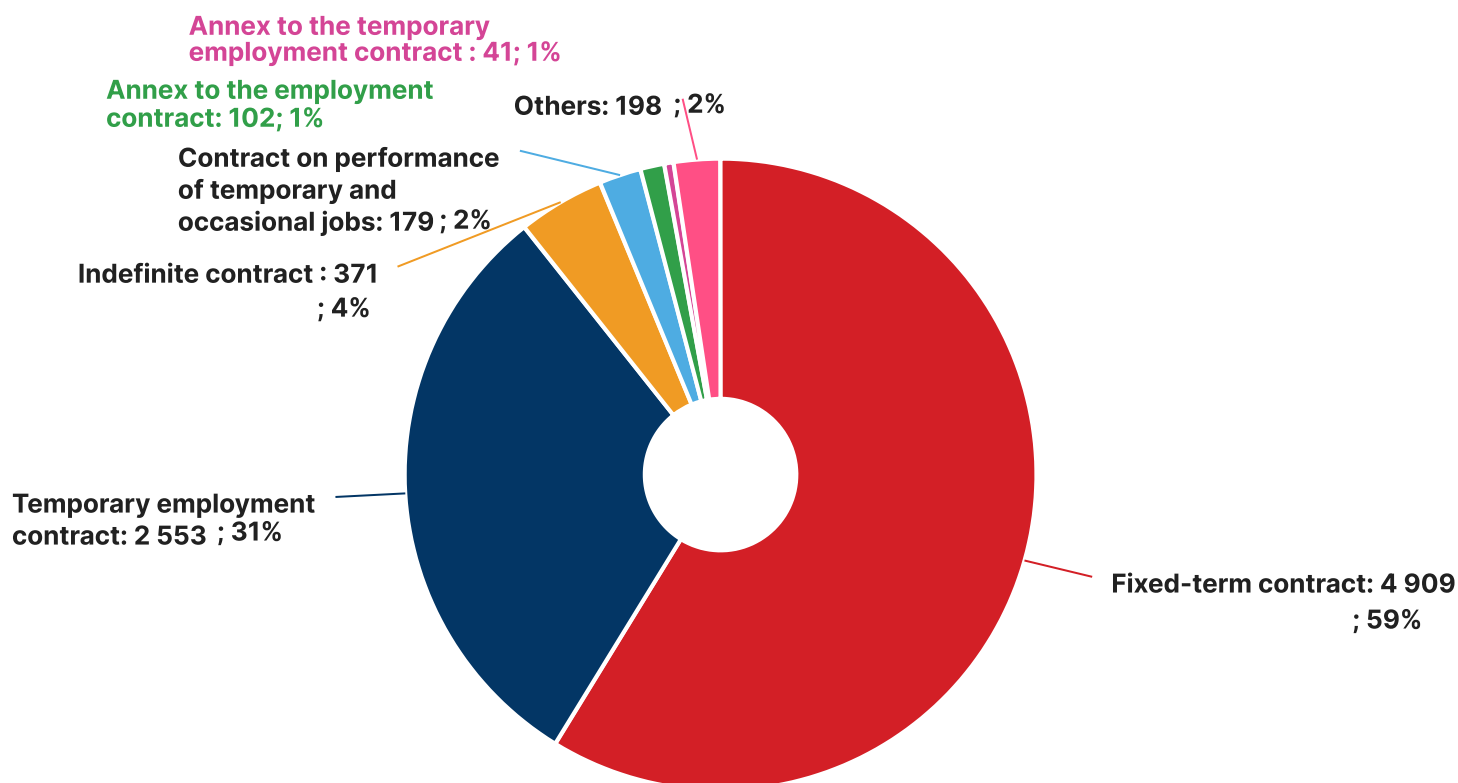


Chart 76: **Types of short-term employment contracts** concluded during the election campaign that were reported to the Agency for Prevention of Corruption

Pre-school institution Đina Vrbica concluded the most contracts, 232, in second place is the Clinical Centre of Montenegro, which concluded 196 contracts during the pre-election campaign, and in third place is the Examination Centre with 194 contracts. They are followed by the Statistical Office, which concluded 152 contracts, the Montenegrin Music Centre with 145, and the Secondary Vocational and Higher Education School Sergije Stanić with 113 contracts.

Name of the institution	Number of persons
Public pre-school institution Đina Vrbica Podgorica	232
Public health care institution Clinical Centre of Montenegro	196
Public institution Examination Centre	194
Statistical Office of Montenegro - MONSTAT	152
Public institution Montenegrin Music Centre	145
Public institution Secondary Vocational and Higher Education School Sergije Stanić	113
Administration for Inspection Affairs	92
Public institution Secondary Vocational School Pljevlja	92
Public institution Secondary School of Music in Tivat	78
Public health care institution General Hospital Bijelo Polje	77

Table 3: *Institutions that reported the most short-term employment contracts concluded during the election campaign*

Case study:

Mass employment of nurses in kindergarten

Concrete examples show that the application of this article is rendered superfluous. Regardless of the significant increase in short-term employment, the institutions do not provide evidence that these jobs are provided for in the acts on systematization, and the APC does not conduct any control in these cases, but only publishes the incomplete data submitted to them.

Although the Law clearly stipulates that contracts can be concluded only if this is provided for in the act on systematization of work positions, most institutions do not submit acts on systematization to APC, nor any other supporting documentation, apart from the contracts themselves, from which it cannot be concluded whether a work position was systematized.

Thus, for example, pre-school institution "Đina Vrbica" concluded 111 contracts with nurses during the election campaign. All signed contracts are for a period of one month.

In no case did this pre-school institution submit proof that the positions were provided for in the act on systematization, but despite that, it was not subject to APC's control.

APC controlled only 10 institutions during the pre-election campaign.

Organ <i>Opština</i>	Lice	Sistematizacija ↑ <i>Tip zaposlenja</i>	Osnov zasnivanja	Datum dostavljanja <i>Akcije</i>
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Anđela Gardašević	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Amina Tuzović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Zilka Melić	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Tanja Mihailović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Ivana Krstović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Milica Lutovac	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Vasja Ratković	medicinska sestra <i>Određeno</i>	Do 30 dana	2.06.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Maja Škuletić	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Kristina Bojović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Anđela Despotović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00

Organ Opština	Lice	Sistematizacija ↑ Tip zaposlenja	Osnov zasnivanja	Datum dostavljanja Akcije
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Sanja Mihailović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Nataša Đukanović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Tijana Uzelac	medicinska sestra <i>Određeno</i>	Do 30 dana	2.06.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Marina Maraš	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Jovana Andrijević	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Adelisa Avdić	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Majda Rebronja	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Ana Đerković	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Kristina Božović	medicinska sestra <i>Određeno</i>	Do 30 dana	4.04.2023. 00:00
JPU Đina Vrbica Podgorica <i>Podgorica</i>	Sanja Rašović	medicinska sestra <i>Određeno</i>	Do 30 dana	2.06.2023. 00:00

Excerpts from the APC's website: Examples of employment of nurses in preschool institutions

3.2.2. Increased payments for short-term employment through temporary employment contracts

In the pre-election period, budget payments for temporary employment contracts increased, as well as the number of these payments. In three months, over 800 thousand euros more was paid on this basis than in the same period of the previous year.

A significant part of the increase in spending by institutions is related to the increase of employment expenses, especially through the conclusion of temporary employment contracts.

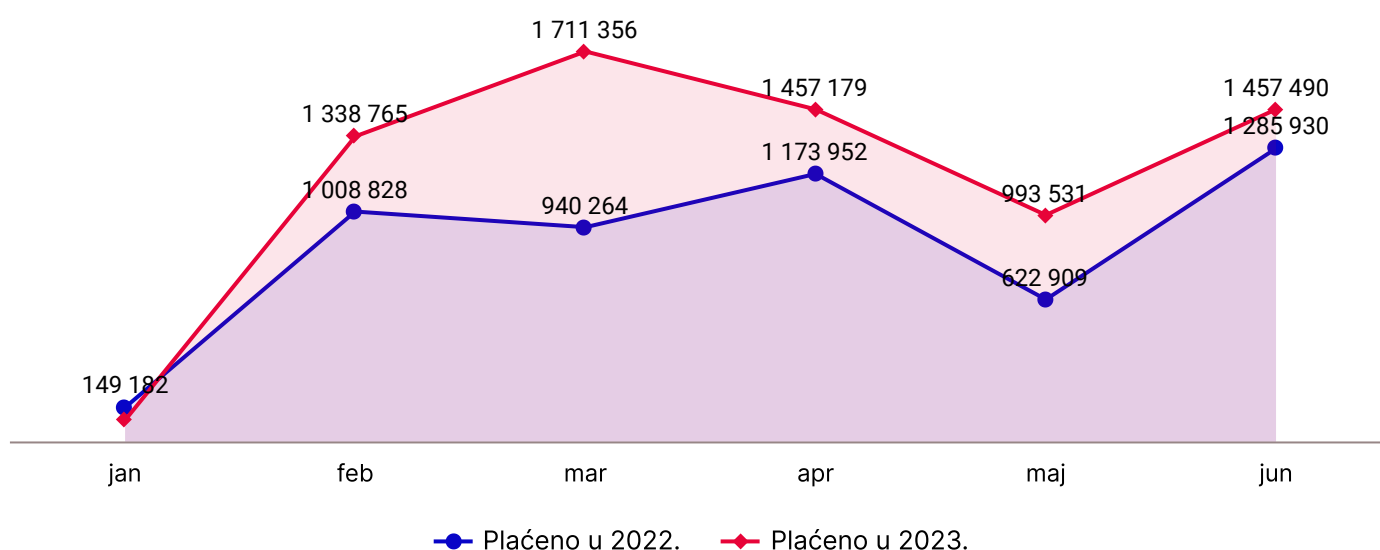


Chart 77: Spending of budgetary spending units for temporary employment contracts during the first six months of 2023 and 2022

In April, over 280,000 euros more was paid than in the same month of the previous year. These expenses increased by over 370,000 in May compared to the same month of the previous year, and by over 170,000 euros in June.

The number of transactions in which the expenses of these contracts were paid also increased, which leads to the conclusion that the number of these contracts also increased, i.e. that there was an increase in short-term employment.

Thus, in June 2023, there were 343 payments more than in the same month of the previous year, which is an increase of 15%. In May, 307 more payments were made for temporary employment contracts than in the same month of the previous year, which is an increase of 24%.

The Ministry of the Interior, the Directorate for Inspection Affairs, the Administration for Managing Forests and Hunting Grounds, the Health Insurance Fund and the Ministry of Culture and Media had the largest increases for the payment of temporary employment contracts during the election campaign.

Institution	Increase in May 2023	Increase in June 2023
Ministry of the Interior	(40,810)	96,278
Administration for Inspection Affairs	-	57,578
Institute for the Execution of Criminal Sanctions	25,464	54,215
Administration for Managing Forests and Hunting Grounds	-	40,817
Health Insurance Fund	(9,169)	34,922
Ministry of Culture and Media	51,124	28,954
Ministry of Economic Development and Tourism	32,495	25,251
Revenue and Customs Administration	(35,948)	19,652
Ministry of Health	2,064	17,514
Ministry of Labour and Social Welfare	5,622	15,902
Statistical Office	12,563	15,617
Ministry of Public Administration	9,766	15,227
Ministry of Agriculture, Forestry and Water Management	(27,757)	14,174
Ministry of Human and Minority Rights	15,827	12,948
Ministry of Education	29,699	12,514
Administration for Capital Projects	14,476	11,231
Ministry of Science and Technological Development	-	10,847
Ministry of Foreign Affairs	14,945	10,646
Ministry of Defence	8,805	9,547
Privatisation and Capital Projects Council	3,600	8,350
Administration for Maritime Safety and Port Management	(5,889)	8,154
Nature and Environment Protection Agency	(2,029)	6,523
Parliament of Montenegro	3,162	6,300
Cadastre and State Property Administration	198,209	(251,298)
Ministry of Capital Investments	21,335	994
Pension and Disability Insurance Fund	16,400	(16,095)
Ministry of Sports and Youth	11,192	(8,026)
Directorate for Food Safety, Veterinary and Phytosanitary Affairs	9,259	(135)
Ministry of European Affairs	6,758	1,892
Secretariat-General of the Government of Montenegro	6,333	(3,562)

Table 4: Institutions that increased payments for temporary employment contracts during May and June 2023 and the amount of the increase

3.2.3. Employment in state-owned companies

The Law on Financing of Political Entities and Election Campaigns does not provide for the obligation of state companies to submit employment data to the APC during the election campaign. Therefore, MANS tried to obtain this data through the Law on Free Access to Information, however, the largest state-owned companies continue to violate this law.

Montenegrin Electric Enterprise (EPCG), the Airports of Montenegro, the Coal Mine, and the Public Enterprise for Coastal Zone Management of Montenegro have for a long time been hiding from the public information about the number and identity of the persons they employed, justifying such practice by protecting privacy or declaring the information a business secret.

Thus, at the end of August 2023, the largest state-owned company – Montenegrin Electric Enterprise, EPCG, banned access to employment data from April 2023 – i.e., from the period when the campaign was intensively conducted, justifying the ban on access to data by protecting the personal data of employed persons. [69]

EPCG's daughter company, the Coal Mine, protects the information about persons employed in April 2023 because it is a business secret, and after the complaint, MANS also filed a lawsuit trying to obtain this information. [70]

Airports of Montenegro, a state-owned company that reported 885 employees in 2022, compared to 787 in 2021, completely ignores requests for free access to information from the NGO MANS related to new employment.

State-owned companies that do provide data – such as the Montenegro Post, hide the amounts of net earnings of employees hired on the basis of temporary employment contracts, justifying it with the protection of personal data.

Bearing in mind that the law does not limit the obligation of state-owned companies to comply with employment restrictions during the election period, this legal loophole has been widely used, thereby exerting a strong influence on the voters and the election process itself. With this practice, the so-called party employment remains one of the key mechanisms of abuse of state resources for party purposes, and one of the most effective methods of buying votes, while the lack of full transparency allows companies, i.e. their managers, to trade jobs in exchange for votes.

[69] Free access to information request of NGO MANS no. 144335 from 09.05.2023.
[70] Free access to information request of NGO MANS no. 144339 from 09.05.2023.

3.3. Pressures from the executive power

After we published data on the increase in spending by state institutions, especially for temporary employment contracts, the Prime Minister reacted and stated: "All temporary employment contracts of the 43rd Government have been published on the website, which was not the case before", while he justified the increase in spending based on the growth of wages, i.e. the growth of individual payments. [71]

On that occasion, Abazović added that MANS, by publishing data on the increase in spending during the campaign, is campaigning for a political option, which he did not wish to name. [72]

"Every time they publish something, I am very grateful, because it speaks of the transparency of the government. They can obtain any information, at any moment they want, everything is available, and they can show it to the public, but not show the half of it, but show it entirely" - Dritan Abazović, May 31, 2023

After MANS's post on the social network X related to secret payments from the budget reserve, Abazović accused MANS of "blurring the names" in the document related to the recipient of the payment, and knowingly releasing such document to the public. [73]

Additionally, at the session of the Government of Montenegro in which the discussion on this topic and the post of MANS began, former Minister of Finance, Aleksandar Damjanović, stated:

"In this way, everyone's mouth is hushed, I mean the ill-intentioned ones." The mouth of an obscure non-governmental organization that has often served as a whip or a weak whip for certain centres of power in various periods was hushed", Damjanović said on that occasion. [74]

In that period, Abazović called criticisms about the lack of transparency and increased spending "malicious", "lies and hoaxes". "After June 11, I will tell the truth about some people, whether they are from the civil sector or some other branches, who think they are untouchable", Abazović said at the time. [75]

[71] See at: <https://www.youtube.com/watch?v=fjIDBL7LZSg>.

[72] See at: <https://www.vijesti.me/vijesti/politika/658820/abazovic-mans-vodi-kampanju-za-jednu-politicku-opciju>.

[73] See at: <https://rtcg.me/vijesti/drustvo/433310/damjanovic-zle-namjere-opiskurne-nvo-abazovic-radimo-transparentno.html>.

[74] See at: <https://www.vijesti.me/vijesti/ekonomija/658995/vlada-porucila-da-mans-manipulise-njenim-dokumentima>.

[75] See at: <https://www.vijesti.me/vijesti/politika/659205/abazovic-kazacu-istinu-o-nekima-koji-misle-da-su-nedodirljivi-nakon-izbora>.

3.4. Acting of the APC

Thanks to the narrow interpretation of legal provisions by the APC, many institutions that increased spending during the election campaign did not suffer the consequences. The Agency determined that the spending limits applied only to months that are entirely part of the election campaign, and only to budget funds that do not include loans or donations.

For the first time, that institution initiated proceedings against officials who worked on the election campaign during working hours. Those proceedings were initiated with great delay and have not yet been concluded.

APC determined that itself was not reporting entity to the Law and stopped publishing travel orders after the media and MANS pointed out the misuse of vehicles by the Director of that institution.

MANS submitted 42 reports to APC related to violations of legal provisions during the election campaign:

- 39 referred to restrictions on the use of state funds (Article 38 paragraph 2) [76],
- 1 to the ban on financing by a legal entity participating in the public procurement procedure (Article 33 paragraph 5) [77],
- 1 to the engagement of public officials in the campaign during working hours (Article 44 paragraph 4)
- 1 to the publishing of travel orders (Article 43 paragraph 3).

Upon our reports, APC initiated 23 proceedings, and 19 were rejected. **One decisions were made that determined a violation of the law**, 14 decisions that the law was not violated, and in eight cases, the decision was not made until the conclusion of this report. [78]

Basis of the violation	Number of submitted reports	Number of APC's proceedings	Outcome of the proceedings
Overrun in April 2023 (Article 38, paragraph 2)	9	9 initiated	4 dismissed, 5 no decision
Overrun in May 2023 (Article 38, paragraph 2)	12	12 initiated	10 dismissed, 2 no decision
Overrun in June 2023 (Article 38, paragraph 2)	18	18 dismissed	-
Campaigning of state officials during working hours (Article 44, paragraph 4)	1	1 initiated	1 no decision
Donation from a company that participated in public procurement (Article 33, Paragraph 5)	1	1 initiated	1 violation determined
Publishing of travel orders (Article 43, paragraph 3)	1	1 dismissed	-

Table 5: Overview of submitted reports by types of violation of provisions of the Law on Financing of Political Entities and Election Campaigns

[76] Described in the Chapter - Increases in public spending during the pre-election campaign.

[77] Described in the Case Study: Unlawful donations of a company that concluded a public procurement contract.

[78] The report was concluded at the end of October 2023.

3.4.1. Reports for increased spending by institutions

The interpretations of the APC narrowed the legal limits on the increase in spending in the pre-election period.

APC decided that spending restrictions cannot apply to the month of June, because the elections were held on June 11, **and the restriction can only be applied if the entire month is a part of the election campaign.**

The Agency previously took the position that the restriction applies to the entire calendar month in the case of the 2022 local elections as well. [79]



Crna Gora
Agencija za sprječavanje korupcije

Broj:UPI-02-03-168/2-2023

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 02-03-168/2023 od 20.07.2023.godine, podnijetoj protiv Ministarstva javne uprave zbog kršenja člana 38 stav 2 Zakona o finansiranju političkih subjekata i izbornih kampanja, dana 21.07.2023.godine donijela je

O D L U K U

O nepokretanju postupka protiv Ministarstva javne uprave, radi utvrđivanja povrede člana 38 stav 2 Zakona o finansiranju političkih subjekata i izbornih kampanja.

O b r a z l o ž e n j e

Agenciji za sprječavanje korupcije je podnesena prijava, zavedena pod brojem UPI 02-03-168/2023 od 20.07.2023.godine, kojom je zatraženo da se pokrene postupak u skladu sa ovlaštenjima propisanim zakonom i da se utvrdi kršenje člana 38 stav 2 Zakona o finansiranju političkih subjekata i izbornih kampanja. U prijavi se navodi da je Ministarstvo javne uprave u junu 2023. godine imalo predviđenu potrošnju u iznosu od 550.392,00 €, dok je istog mjeseca potrošeno 1.129.982,00 €, što je za 579.590,00 € više u odnosu na pomenuti plan potrošnje konkretne institucije za navedeni mjesec, što nedvosmisleno ukazuje na postupanje suprotno članu 38 stav 2 Zakona o finansiranju političkih subjekata i izbornih kampanja.

Naime, članom 38 stav 2 Zakona o finansiranju političkih subjekata i izbornih kampanja propisano da „ukoliko se izbori održavaju u prvoj polovini godine, zabranjena je **mjesečna potrošnja** veća od iznosa određenih mjesečnim planom potrošnje koje utvrdi Ministarstvo ili organ lokalne uprave na početku fiskalne godine“, te imajući u vidu da su vanredni parlamentarni izbori održani 11.06.2023. godine, iz čega konstatujemo da u konkretnom nije protekao mjesec jun 2023. godine, kako bi se za isti izvršilo upoređivanje mjesečne potrošnje sa

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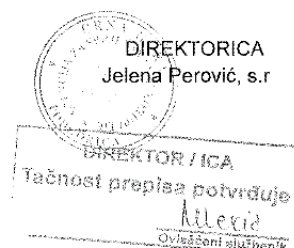
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mjesečnim planom potrošnje, te stoga nema mjesta pokretanju postupka radi utvrđivanja kršenja člana 38 stav 2 Zakona o finansiranju političkih subjekata i izbornih kampanja.

Shodno članu 56 stav 3 Zakona o finansiranju političkih subjekata i izbornih kampanja, a na osnovu izloženog, odlučeno je kao u izreci ovog rješenja.

APC's response to one of the reports related to overrun in June 2023



[79] MANS Report on the financing of 2022 local elections, Chapter B.3. Suspension of legal restrictions on public spending, available at: <http://www.mans.co.me/en/wp-content/uploads/2023/01/Report-on-the-financing-of-2022-local-elections.pdf>.

APC states in its decisions that the increase in spending financed from **loans or donations does not constitute a violation of the law.**

That institution also believes that the violation of the law does not represent an increase in spending based on higher interest expenses or due to forced collection, since they are not part of the monthly spending plan.

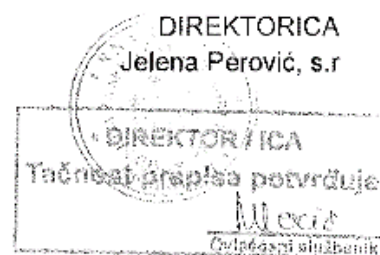
U toku ispitnog postupka Agencija za sprječavanje korupcije (u daljem tekstu: Agencija) je izvela dokaze i to: izvršila uvid u Pregled planirane i realizovane potrošnje tokom maja 2023. godine Ministarstva finansija, izvršila uvid u izjašnjenje Agencije za zaštitu ličnih podataka i slobodan pristup informacijama.

Uvidom u Pregled planirane i realizovane potrošnje tokom maja 2023. godine od strane Ministarstva finansija utvrđeno je da je planirana mjesečna potrošnja za Agencije za zaštitu ličnih podataka i slobodan pristup informacijama iznosila **65.974,72 €**, a da je ukupno potrošeno 90.983,04 €, odnosno **51.824,31 €** bez donacija, kredita, transakcija finansiranja, kamata i prinudne naplate, što predstavlja potrošnju manju za **14.150,41 €** od planirane za mjesec maj.

Nakon razmatranja spisa predmeta i ocjene dokaza i to: Pregleda planirane i realizovane potrošnje tokom maja 2023. godine od strane Ministarstva finansija i izjašnjenja Agencije za zaštitu ličnih podataka i slobodan pristup informacijama, utvrđeno je da Agencija za zaštitu ličnih podataka i slobodan pristup informacijama nije prekršila član 38 stav 2 Zakona o finansiranju političkih subjekata i izbornih kampanja, jer nije prekoračila planiranu mjesečnu potrošnju za maj 2023. godine.

Na osnovu izloženog odlučeno je kao u izreci ovog rješenja.

Uputstvo o pravnoj zaštiti: Protiv ovoga rješenja stranka može pokrenuti upravni spor pred Upravnim sudom Crne Gore, u roku od 20 dana od dana dostavljanja rješenja.



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APC's response to one of the reports related to overrun in May 2023

3.4.2. Reports for campaigning during business hours

For the first time, APC initiated proceedings against several high-ranking public officials who had been active in the election campaign during working hours. However, the proceedings were initiated four months after the reports were submitted, and by the conclusion of this report, they were not completed.

During the monitoring of the election campaign, we found that several members of the Government were engaged in the activities of the election campaign during the time provided for official duties.

The report was submitted on June 9, 2023, and the APC made decisions on October 9 and initiated proceedings against several state officials, namely: the Prime Minister, the Deputy Prime Minister and the Minister of Capital Investments, the Minister of Ecology and European Affairs, the Director of EPCG, the State Secretary of the Ministry of Capital Investments and the State Secretary of the Ministry of Labour and Social Welfare.



Crna Gora
Agencija za sprječavanje korupcije

N.V.O. "MANS"
Broj: 389-A
Podgorica, 16. 10. 2023. god.

Broj:UPI-02-03-193/2-2023

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 podnijetoj protiv javnog funkcionera Dritana Abazovića zbog kršenja člana 44 stav 4 Zakona o finansiranju političkih subjekata i izbornih kampanja, dana 09.10.2023.godine donijela je

ODLUKU

Pokreće se postupak protiv javnog funkcionera Dritana Abazovića, radi utvrđivanja povrede člana 44 stav 4 Zakona o finansiranju političkih subjekata i izbornih kampanja.

Obrazloženje

Agenciji za sprječavanje korupcije je podnesena prijava, kojom je zatraženo da se pokrene postupak u skladu sa ovlaštenjima propisanim zakonom i da se utvrdi kršenje člana 44 stav 4 Zakona o finansiranju političkih subjekata i izbornih kampanja. U tekstu, koji je dostavljen kao prilog prijavi, se navodi da je javni funkcioner Dritan Abazović u ponedjeljak 29.05.2023. godine u 12.30h časova imao promociju u Baru, dok je dan kasnije 30.05.2023. godine obišao sedam gradova na sjeveru zemlje, od Rožaja gdje je imao promociju u 10.20h do Bijelog Polja, u kome je imao promociju nešto poslije 20h. U četvrtak 01.06.2023. godine nešto poslije podne je imao promociju u Podgorici, a dva sata kasnije u Budvi. U utorak 06.06.2023. godine je imao promociju u Plužinama u 13.30h, u Pljevljima u 19h, a 07.06.2023. godine imao je promociju u Danilovgradu, što predstavlja kršenje člana 44 stav 4 Zakona o finansiranju političkih subjekata i izbornih kampanja.

Shodno članu 56 stav 3 Zakona o finansiranju političkih subjekata i izbornih kampanja, a na osnovu izloženog, odlučeno je kao u izreci ovog rješenja.

APC's decision to initiate proceedings against the Prime Minister for running a campaign during working hours

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Until the end of October, when this report was concluded, APC did not determine whether these officials had broken the law.

3.4.3. Reports for non-publishing of travel orders

APC determined that itself was not reporting entity to the Law and stopped publishing travel orders. Such practice was established by this institution only after filing a criminal complaint for the misuse of vehicles for private purposes, which is based on the travel orders that the institution published before the previous elections.

Članom 4 Zakona o sprečavanju korupcije propisano je da je Agencija za sprečavanje korupcije samostalno i nezavisno tijelo, koju osniva Skupština Crne Gore. Ista ima svojstvo pravnog lica.

Dakle, imajući u vidu da Agencija za sprječavanje korupcije nije državni organ, organ državne uprave, organ lokalne samouprave, organ lokalne uprave, javna ustanova, državni fond, privredno društva čiji je osnivač i/ili većinski ili djelimični vlasnik država ili jedinica lokalne samouprave, već samostalno i nezavisno tijelo koje ima svojstvo pravnog lica, to ista nema zakonsku obavezu objavljivanja putnih naloga.

Shodno članu 56 stav 3 Zakona o finansiranju političkih subjekata i izbornih kampanja, a na osnovu izloženog, odlučeno je kao u izreci ovog rješenja.



Excerpt from the decision of the APC issued after the report of MANS against that institution due to non-publishing of travel orders

The Agency rejected our complaint against itself and stated that it was not obliged to publish travel orders because "it is not a state body, state administration body, local government body, public institution, a state fund, business company whose founder and/or majority or partial owner is the state or a unit of local self-government, but an autonomous and independent body that has the status of a legal entity, and thus it does not have the legal obligation to publish travel orders."

APC was founded by a decision of the Parliament of Montenegro.

That institution used to publish its travel orders, but this practice discontinued after an investigative story that revealed that the Director and her deputy had covered over 6,800 kilometres with official cars in just one month. [80] MANS previously revealed that the Agency had acquired a luxury BMW vehicle, and that the Director, by a special decision, assigned it to herself for a permanent use (24 hours) although, according to the Government Decree on the use of vehicles owned by Montenegro, she had no right to do so. [81] That is why we filed a criminal complaint with the Special State Prosecutor's Office, which opened an inquest. [82]

The screenshot shows the ASK (Agencija za sprječavanje korupcije) website. The top navigation bar includes links for 'O Nama', 'Biblioteka', 'Javni registri', 'Lista javnih funkcija', 'Korisnički servisi', and 'Kontakt'. A search bar is present with the text 'Pretraga...'. Below the navigation bar, there are several menu items: 'Sukob interesa', 'Politički subjekti', 'Integritet', 'Lobiranje', 'Zviždači', 'Analiza propisa', 'Međunarodna saradnja', 'SPI', 'Savjet Agencije', 'Izveštaji o radu', and 'Prikaži sve stavke'. The main content area is titled 'sva dokumenta' and contains a search filter for 'putni'. A list of travel orders is displayed, each with a title and a date. The list includes:

- PUTNI NALOZI TUZI 2023 (datum: 6.02.2023. objavljen: 6.02.2023.)
- Putni nalogi - Herceg Novi, Bar, Bijelo Polje i Mojkovac (datum: 3.02.2023. objavljen: 3.02.2023.)
- Putni nalogi - Plužine, Žabljak, Andrijevića, Nikšić, Gusinje, Kotor, Tivat, Šavnik (datum: 3.02.2023. objavljen: 3.02.2023.)
- Putni nalogi - Danilovgrad, Plav, Kolašin, Budva, Cetinje (datum: 2.02.2023. objavljen: 2.02.2023.)
- Putni nalog - ASK 23-29.01.2023. (datum: 30.01.2023. objavljen: 30.01.2023.)
- Putni nalogi ASK -17-22.01.2023. (datum: 23.01.2023. objavljen: 23.01.2023.)
- Putni nalog - ASK decembar 2022 (datum: 11.01.2023. objavljen: 11.01.2023.)
- Putni nalogi izbori oktobar 2022 (datum: 11.01.2023. objavljen: 11.01.2023.)
- Putni nalog - ASK 1 - januar, februar, mart, april, oktobar i novembar (datum: 21.12.2022. objavljen: 21.12.2022.)
- Putni nalog - ASK 2- april, oktobar, novembar (datum: 21.12.2022. objavljen: 21.12.2022.)

At the bottom of the list, it says 'Ukupno: 165' and 'datum dokumenta'. There is also a pagination control showing '1 2 3 4 ... 17'.

*Excerpt from the APC's website,
where travel orders of that institution were previously published*

[80] <https://www.vijesti.me/vijesti/drustvo/660253/ask-nije-objavila-nijedan-svoj-putni-nalog-tokom-kampanja-za-izbore-kilometre-prestali-da-broje> .

[81] <https://www.mans.co.me/en/?p=9348> .

[82] <https://rtmk.me/drustvo/specijalni-tuzioci-broje-predjenu-kilometrazu/> .

In June 2023, based on the Law on Free Access to Information, MANS requested that APC publish its travel orders. That institution refused to publish the requested data, arguing that the State Prosecutor's Office is conducting an investigation into the use of their official vehicle, even though that procedure refers to the 2022, which was not covered by the request for information.

Utvrđeno je da bi dozvolom pristupa traženoj informaciji, ista bila data na uvid opštoj javnosti objavljivanjem na sajtu Agencije shodno članu 12 stav 1 tačka 11 Zakona o slobodnom pristupu informacijama. Očijenjeno je da u tom slučaju Agencija nema uticaj na dalju obradu tražene informacije, pa stoga ni pravo da na sebe preuzme rizik nastanka eventualne štete po rezultat aktivnosti koje preuzima nadležni tužilac (koje su povjerljive prirode), prava potencijalnih stranaka pred tužiocem, a time i po integritet postupanja same Agencije. Dodatno, za ukazati je i na presudu Vrhovnog suda Crne Gore Uvp 792-2022 od 10. novembra 2022. godine, kojom je sud dao povjerenje navodima prvostepenog organa u slučaju odbijanja zahtjeva za pristup podacima u posjedu Agencije, a koji podaci se odnose na materiju o kojoj postupa nadležno državno tužilaštvo. Imajući u vidu nabrojane okolnosti, a s obzirom da je riječ o početnoj fazi ispitivanja okolnosti kod nadležnog organa, Agencija nije u posjedu dovoljno elemenata koji bi sami po sebi ukazivali na prisustvo nekog od preovlađujućih javnih interesa za objavljivanje tražene informacije, nabrojanih u članu 17 Zakona o slobodnom pristupu informacijama.

Polazeći od napred navedenog stanja stvari, Agencija je odlučila kao u dispozitivu na osnovu člana 29 stav 1 tačka 3 Zakona o slobodnom pristupu informacijama (po kojem organ odbija zahtjev ako postoji razlog iz člana 14 ovog zakona za ograničenje pristupa informaciji), u vezi člana 16, člana 17 i člana 14 stav 1 tačka 3 alineja 4 i 7, u interesu prevencije istrage, radi zaštite od objelodanjivanja podataka koji se odnose na dokaze prikupljene izviđajem i istragom i efikasnost vođenja postupka, sve navedeno u roku iz člana 15 Zakona o slobodnom pristupu informacijama.

UPUTSTVO O PRAVNOJ ZAŠTITI: Protiv ovog rješenja dozvoljena je žalba u roku od 15 dana od dana prijema rješenja, neposredno Agenciji za sprječavanje korupcije ili Agenciji za zaštitu ličnih podataka i slobodan pristup informacijama.



