

OBSERVATION MISSION

My Vote★

ASSESSMENT OF THE PRE-ELECTION ENVIRONMENT

INTRODUCTION

The observation mission “My Voice” has concluded its assessment of the pre-election environment. The assessment was conducted with the participation of a number of civil society organizations that are members of the mission. The overall assessment of the observation mission suggests that the pre-election environment for the October 26, 2024 parliamentary elections was uneven, despite the fact that political parties were not restricted in their capacity to participate in the elections. In addition, the decisions and actions of state institutions in addressing electoral violations were found to be unfair and biased in favor of the ruling party.

The seizure of state institutions had a negative impact on the pre-election process. The distinction between the ruling party and the state was completely erased. All three branches of government were entirely subservient to the interests of the ruling party. Law enforcement agencies and other relevant institutions did not formally respond to specific violations, including criminal acts, nor did they take action to prevent such acts.

It is particularly noteworthy that the entire pre-election period was marked by a hostile environment for Georgian civil society organizations. Throughout this period, these organizations were subjected to a range of hostile actions, including threats, verbal attacks, and discrediting campaigns. It is noteworthy that no political official or head of an ostensibly independent agency remained uninvolved in the disinformation and discrediting campaign against the civil society sector. Some civil society

representatives were portrayed in a negative context in the ruling party's official campaign ad.

The pre-election period was also characterized by the prevalence of a substantial disinformation campaign. The overwhelming majority of the state apparatus and propaganda tools under the control of the government were employed to advance the electoral goals of the ruling party. The process was not limited to the institutions of the legislative and executive authorities; it also encompassed the judiciary and the so-called independent institutions, including the Central Election Commission, the Communications Commission and the Anti-Corruption Bureau.

The use of administrative resources for the electoral purposes of the ruling party was a notable trend during the pre-election period. Traditionally, the use of legal, institutional and financial administrative resources was a common occurrence. Furthermore, the scales of campaign and, in general, party financing were also found to be uneven, particularly when the beginning of this year was taken as a point of reference.

Government-critical media outlets were subjected to constant attacks from the government. The Communications Commission tried to create a facade of neutrality, but this was undermined by the fact that it imposed fines on broadcasting companies that were critical of the government, in violation of the law and without justification. Furthermore, the few instances of fines imposed on pro-government TV channels did not alter the overall situation.

During the electoral period, there was a notable disparity in access to the media for those involved in the electoral process. Media outlets under government control were inaccessible to opposition parties and civil society organizations. In addition, members of the ruling party refrained from visiting critical media outlets, which impeded the process of disseminating information to the voters.

By adopting the Law “On Transparency of Foreign Influence” (“Russian Law”) in April 2024, the Georgian government openly challenged the fundamental principles and values that underpin the European Union. In response to this action by the government, the European Union [announced](#) Georgia’s accession process de-facto halted.

1. ASSESSMENT OF ELECTORAL LEGISLATION

1.1. *EU recommendations to Georgia on elections*

On December 15, 2023, Georgia was granted EU candidate status, on the understanding that the country would fulfill the nine steps outlined by the European Commission. Regarding the electoral process, the European Commission stipulated the necessity for a free, fair and competitive electoral process, as well as the comprehensive implementation of the recommendations put forth by the OSCE/ODIHR.

However, the Georgian government did not take any action to fulfill these requirements. In fact, the measures implemented by the government after December 15, 2023, represented a deviation from the nine steps set forth by the EU.

1.2 Adoption of “Russian law”

Although the government has not yet employed administrative measures to restrict the activities of civil society actors through the use of its repressive mechanisms in accordance with the provisions of the “Russian law,” the enactment of this law and the processes associated with it have nevertheless resulted in a notable deterioration of the electoral process. The polarization between the political forces in the country has reached its peak. Furthermore, an atmosphere of anxiety and uncertainty has been created, in addition to physical and moral pain and suffering for hundreds of Georgian citizens and their relatives who peacefully protested against the “Russian law,” due to the violent actions of the state and its mobilized groups.

The adoption of the “Russian law” was not the only anti-democratic legislative measure implemented by the government in the current election year. As will be detailed below, a number of further amendments were adopted to the current legislation, which have significantly worsened the electoral legislation. The objective of these legislative amendments was to tailor the electoral legislation to the interests of the ruling party.

1.3 Changes to the CEC composition rules

In February and March 2024, the Parliament passed, in its second and third readings, amendments to the electoral legislation that once again changed the procedure for composing the Central Election Commission (CEC). The President of Georgia exercised

the right of veto, but this was overridden by the Parliament. The amendments allowed the ruling party, in case of failure to achieve a formal $\frac{3}{5}$ majority, to elect, at their own discretion, without considering the opposition views, the CEC chairperson and other non-partisan members with 76 votes. The same amendments also revoked the Georgian President's authority to appoint CEC members in the absence of the aforementioned quorum, transferring this responsibility to the Chairman of Parliament. Additionally, the position of the deputy chairman of the CEC, which was originally designated for an opposition representative, was eliminated.

The Venice Commission and OSCE/ODIHR expressed sharp criticisms and numerous [recommendations](#) regarding amendments, none of which were ultimately considered by the Georgian government.

In April 2024, Giorgi Kalandarishvili was elected to the position of CEC chairman with 85 votes, based on the aforementioned amendments. Similarly, several other members of the CEC were elected through the same process.

1.4. Abolition of gender quotas

The abolition of gender quotas in April 2024 also proved problematic. The bill was initiated by the Girchi party and supported by Georgian Dream. The President exercised her veto power again, which was subsequently overridden by the Parliament. The legislative amendment abolished the mandatory gender quotas in Parliament and local self-government bodies. Additionally, the 30 percent supplement to the budget funding

for increasing women's political participation and the empowerment of women's organizations in the parties was also abolished in the Organic Law "On Political Associations of Citizens." The legislative package, which drew [criticism](#) from the Venice Commission, was discussed and adopted through expedited procedures.

Ensuring gender equality was among 12 priorities outlined by the European Commission for Georgia upon recognizing the European perspective for the country. Mandatory gender quota, as a temporary norm to achieve equality, represents the most effective practice observed in European countries, and its introduction in Georgia has been positively evaluated by a number of international organizations. The abolition of gender quotas represents a step backwards in terms of increasing women's participation in political life and aligning the country's legislation with the EU acquis.

1.5. Introduction of the institute of "delegates"

In May 2024, the Parliament passed another amendment to the Election Code, which granted political parties the right to designate individuals on their party list as "delegates" of registered voters in specific electoral districts. The purpose of this amendment was to replace the previous system of majoritarian MPs with the aforementioned delegates. This would assist the ruling party in associating itself with individuals who possess some degree of local influence. Such individuals are frequently referred to as "local feudals" and, due to the financial or other resources at their disposal, they enjoy a certain degree of support among the population.

Since the opposition parties have practically no such individuals at their disposal, as they are inherently aligned with the ruling force, it is evident that this change will benefit the ruling party exclusively.

1.6. International standards violated in adopting the aforementioned legislative amendments

The aforementioned amendments were adopted by the Georgian Dream-controlled parliament without prior consultation with opposition parties and civil society. This contravenes the internationally recognized principle that, along with other requirements, any amendment to electoral legislation must be [adopted](#) by broad consensus.

An internationally recognized standard, upheld by the Venice Commission, is that electoral law must enjoy a certain [stability](#) and not be subject to frequent changes, especially in an election year. The current legislative policy of the ruling party directly contravenes this principle.

1.7. OSCE/ODIHR recommendations that have yet to be implemented

The electoral legislation still needs to be improved in a number of areas, which were identified by OSCE/ODIHR years ago, but the government has not taken any action on it yet:

- Making changes to the election administration composition rules to prevent the dominance of one political party.
- Enhancement of the legal and institutional framework to combat the abuse of administrative resources.
- Regulation of the participation of high-ranking officials, including mayors, in the pre-election campaign.
- Ensuring proper consideration of complaints by election commissions.
- Immediate and effective measures by relevant agencies to investigate allegations of intimidation, coercion and vote buying, etc.

2. WORK ENVIRONMENT FOR MONITORING ORGANIZATIONS

2.1 Hostile environment

In recent years, the civil society of Georgia has been subjected to a series of coordinated attacks by the representatives of the ruling party and the propaganda media outlets that disseminate the government's narratives. However, the operational space for Georgian civil society organizations has been significantly restricted since the spring of 2024, following the reintroduction of the "Russian Law." In addition to being discredited online, civil society leaders and activists have been subjected to verbal and physical attacks in real life, as well as phone threats and vandalism of private property.

Throughout the entire pre-election campaign, the government repeatedly tried to capitalize on a conspiracy theory suggesting that revolutionary processes would erupt in Georgia after the elections, blaming the West and non-governmental organizations for orchestrating such efforts. As evidence to support this false claim, the government pointed to various color revolutions that had taken place in different countries at different times, fostering misleading expectations that a similar scenario would unfold in Georgia.

A strongly negative, aggressive, and contemptuous rhetoric was directed toward non-governmental organizations, accompanied by baseless accusations. These claims alleged that NGOs opposed the principles of transparency, acted on behalf of foreign donors, and worked against the interests of Georgia.

In the pre-election period, a notably hostile environment was created against civil monitoring organizations by pro-government propaganda outlets, online outlets, and anonymous social media accounts. Their stories, posts, and articles primarily aimed to discredit these monitoring organizations, often taking on a highly personalized tone. Female civic leaders, particularly Nino Lomjaria and Eka Gigauri, were the main targets of coordinated disinformation and manipulative attacks. The discrediting campaign against them was sustained, meticulously organized, and deliberately planned, reflecting the ongoing rhetoric of the ruling party.

The content primarily sought to propagate conspiracy theories, aiming to portray civil society organizations, critical media outlets, the president, and opposition parties as a unified force “controlled by external influences.”

During the pre-election period, an active slander and hate campaign targeted local monitoring organizations and their leaders. Notably, the Georgian Dream advertisement stood out, depicting several civil society leaders in an unethical and misleading light. Additionally, in October, a new website called USAmshoblo was launched by an anonymous author, allegedly linked to Georgian Dream. The site portrays civil society representatives in an offensive and derogatory manner.

During the pre-election period, at least 146 pieces targeting Georgian civil society organizations were produced by Imedi, POSTV, Rustavi-2, and the Public Broadcaster, aiming to damage their dignity and reputation. These materials were repeatedly aired throughout the days. Among these, the stories produced by the Public Broadcaster were relatively neutral compared to the content aired on the other three channels. Additionally, similar discrediting stories and cards were frequently promoted as sponsored posts on the social media platforms of these TV channels. According to data from Meta’s political ads library, Imedi and POSTV spent between 3,000 and 10,623 USD on sponsoring this content.

In total, between August 27 and October 16, TV company Imedi posted 251 sponsored posts, while POSTV (POSTV-Analytics and POSTV-News) posted 1,354. These posts not only supported the pre-election campaign of the Georgian Dream party but also aimed

to discredit the opposition, the president, civil society organizations, Euro-Atlantic institutions, and Western leaders.

2.2 The Anti-Corruption Bureau's Unsuccessful Attempt to Disrupt the Civil Society Monitoring Mission

The Anti-Corruption Bureau also attempted to join the campaign against civil society, likely following government directives. On September 24, 2024, its head, Razhden Kuprashvili, issued a [decision](#) labeling Transparency International Georgia and its executive director, Eka Gigauri, as entities with declared election goals.

In response to the unlawful [decision](#) made by the head of the Anti-Corruption Bureau, Transparency International Georgia issued a statement declaring that it did not recognize the status assigned to it as neither the organization nor its executive director was running for election. According to the organization, this decision by the authorities was a direct attack on the coalition observation and monitoring mission “My Voice”. In response to the situation, Transparency International Georgia announced that, for the first time in its history, it was unable to fulfill its responsibilities as an election monitoring body.

The response from Transparency International Georgia appears to have caught the authorities off guard. It seems the government has come to realize that such actions could raise questions about the legitimacy of the elections even during the pre-election

period. This is why Prime Minister Irakli Kobakhidze, despite supporting the decision made by the head of the Anti-Corruption Bureau from a legal standpoint, urged him to revoke it. The head of the Anti-Corruption Bureau promptly [complied](#) with this request.

It is important to note that, despite its brief validity, the annulled decision had a significant negative impact on the activities of Transparency International Georgia during the pre-election period. Rather than focusing on the issues of the observation mission, the organization spent a week devising and implementing a legal strategy in response to this unprecedented decision. This diversion seriously hindered the execution of planned observation activities in an already limited pre-election timeframe.

3. CENTRAL ELECTION COMMISSION

3.1 Positive Aspects of CEC Activities

The CEC's efforts to inform voters during the pre-election period can be viewed positively, especially considering that the introduction of the electronic vote-counting system has altered the voting procedures compared to previous elections. The CEC made significant efforts to keep voters informed about procedural updates. Additionally, the CEC provided training to monitoring organizations on the operation of electronic technologies for election day.

It is also worth noting that the monitoring organizations faced no obstacles in registering their entities and accrediting their observers.

It is noteworthy that the CEC decided to include in the special election list citizens of Georgia living abroad whose registration addresses are in occupied territories or are otherwise unclear. The observation mission My Voice indicated that this issue could be addressed through a normative act of the CEC, a possibility that the CEC had long denied, citing legal requirements as the reason.

3.2 CEC's Problematic Decisions

Unfortunately, despite the ongoing appeals from the President of Georgia, political parties, civil society, and Georgian citizens living abroad, the CEC adopted an unreasonably narrow interpretation of the Election Code and opened polling stations only in cities where consular or diplomatic representations are located. The significant distance and the limited number of polling stations create substantial challenges for many immigrants seeking to register and participate in elections. The Coalition believes that with the necessary commitment and proper coordination between the CEC and the Ministry of Foreign Affairs, it would have been feasible to open additional polling stations in cities with high concentrations of Georgian immigrants based on their registration addresses. This could have effectively addressed the geographical and other barriers they face.

It was concerning that the CEC, in violation of the relevant provisions of the Election Code of Georgia, altered the process for assigning functions to commission members at polling stations. Specifically, on August 16, 2024, the CEC adopted a [resolution](#) allowing the distribution of functions among commission members to occur seven days prior to the election, rather than on election day as stipulated. This change undermines the transparency of the electoral process and, as previously noted, contradicts the Election Code. The assignment of functions at the polling station is crucial, as it determines which commission member is responsible for each task on election day. Previously, this procedure took place from 7:00 AM to 8:00 AM on election day. Consequently, it was accessible to all parties entitled to be present at the polling station, including local and international observers, media representatives, and political party members. This arrangement ensured thorough oversight of the voting process at all polling stations. The alteration of this rule resulted in many monitoring organizations being unable to observe the process of assigning functions among commission members.

On September 12, 2024, European Orbit of Georgia [submitted](#) a complaint to the CEC regarding the pre-election [advertisement](#) of Georgian Dream - Democratic Georgia. This advertisement featured images of the leaders of the European Orbit of Georgia and Transparency International Georgia, among others. The advertisement incited enmity and contained hateful content, violating the Election Code's prohibition against such campaign practices.

The Chairman of the CEC addressed the complaint without convening a discussion with the involved parties, ruling that the videos published by Georgian Dream - Democratic Georgia which promote enmity and hatred constituted [permissible](#) campaign material. This conclusion was unjustified, particularly since the videos directly contradict Article 45, Clause 3 of the Election Code, are incompatible with democratic standards, and pose a significant threat to peaceful social coexistence.

Such decisions by the CEC, which contradict legal requirements, undermine its reputation as an independent election administration body.

4. MISUSE OF ADMINISTRATIVE RESOURCES FOR ELECTORAL PURPOSES

4.1 Blurred lines between the Ruling Party and the State

The observation by Transparency International Georgia [revealed](#) that the use of administrative resources for the October 26 parliamentary elections, in a context where the boundary between the ruling party and state institutions is virtually nonexistent, poses a significant challenge to the fair electoral process.

Key challenges include deteriorating legislation, particularly the negative impact of Russian law on the electoral environment; the use of the Anti-Corruption Bureau and the Communications Commission to intimidate civil society and critical broadcasters; incidents of violence against opposition representatives and the ineffective

investigation of these attacks; attempts to pressure voters, including civil servants, through threats, intimidation, unlawful collection of personal data, and confiscation of identity cards; and the large-scale mobilization of employees from budgetary organizations by the ruling party for the election campaign, as well as the misuse of budgetary programs for partisan purposes and other malpractices.

The observation from July 1 to October 15, 2024 revealed the following findings:

4.2 Misuse of Legal Administrative Resources for Electoral Purposes

In the first chapter of this report, titled “Assessment of Existing Legislation,” we provided a detailed overview of the legislative measures implemented by the government to advance the electoral goals of the ruling party. Below, we will briefly summarize these measures again:

Adoption of the Russian Law: In April 2024, the authorities reintroduced the legislative initiative from the previous year - the so-called Law on Transparency of Foreign Influence, commonly referred to as the Russian Law. The events surrounding the law’s adoption also had significant implications for the electoral processes.

Changing the Procedure for Staffing the CEC: In the spring of 2024, the Parliament enacted amendments to the electoral legislation that revised the procedure for appointing members of the CEC. These changes enabled the ruling party, with a majority

of 76 votes, to select the chairman of the CEC and other members based on so-called professional criteria.

Abolition of Gender Quotas: Another significant legislative change enacted in April 2024 eliminated the mandatory gender quotas for parliament and local self-government bodies.

Expanding the Powers of the Anti-Corruption Bureau: In the summer of 2024, the government enacted several amendments to the Organic Law of Georgia on Political Unions of Citizens, thereby enhancing the powers of the Anti-Corruption Bureau.

Introduction of the “Delegates”: In May 2024, the Parliament amended the election code to allow parties to appoint individuals from their parliamentary list as “delegates” representing voters registered within the electoral district.

Voting on the Distribution of Functions of Precinct Commission Members: On August 16, 2024, the CEC adopted a resolution stating that the distribution of functions among precinct commission members would occur seven days before the election, rather than on election day itself.

Involvement of Khareba, known for the Brutal Crackdowns on Peaceful Demonstrators, in the Election Process for Allegedly Ensuring Security on Election Day: On September 30, 2024, the Minister of Internal Affairs issued an order establishing that the so-called Territorial Groups would be staffed by Zviad Kharazishvili (“Khareba”), who has been sanctioned by the U.S. Treasury Department for serious human rights violations. This

involvement raises concerns about the use of force under the guise of ensuring security on election day.

Instability of Electoral Legislation: Overall, the government's proactive legislative policy during the election year, aimed at deteriorating existing standards, significantly undermines recognized international norms. According to these standards, any changes to electoral legislation should be founded on broad consensus. Additionally, electoral legislation should remain stable, especially in the year leading up to elections, and should not be subject to frequent modifications.

4.3 Misuse of Executive Administrative Resources for Electoral Purposes

The unlawful decisions of the so-called independent institutions: During the pre-election period, the so-called independent institutions - specifically, the Anti-Corruption Bureau and the Communications Commission - made decisions that appeared to be directed by the government. These decisions were aimed at undermining civil society and targeting broadcasters critical of the government.

The unlawful decision of the Anti-Corruption Bureau: As mentioned earlier, the head of the Anti-Corruption Bureau's decision to label the monitoring organization Transparency International Georgia and its executive director, Eka Gigauri, as entities with declared election goals represented a misguided attempt by the government to obstruct the organization's participation in the election monitoring process. This action was ultimately aimed at hindering the My Voice coalition from fulfilling its overall

monitoring objectives. However, despite its brief duration, this decision still negatively impacted the organization's work.

Persecution of critical media by the Communications Commission: Beginning in August and continuing through September and October, the Communications Commission repeatedly identified government-critical broadcasters - namely, Mtavari TV, TV Formula, and TV Pirveli - as violators of the law for various reasons. Consequently, the courts imposed significant penalties on these broadcasters. The Commission's repressive decisions were in response to videos that promoted the country's European integration, the depiction of protests against the Russian law; the Refusal to air pre-election advertisements from Georgian Dream that depict representatives of non-governmental organizations, including monitoring organizations, in an unethical, dishonest, and misleading context; The refusal of the aforementioned broadcasters to air another advertisement from Georgian Dream, which exploited footage of Russia's aggressive war in Ukraine and the destruction of Ukrainian cities for electoral gains; Granting qualified entity status to the Gakharia For Georgia party and others.

Violence by ruling party affiliated groups against opposition parties: During the pre-election period, groups allegedly coordinated by the ruling party remained active, attacking opposition representatives and obstructing their ability to conduct a fair election campaign. Specifically, representatives from the National Movement, Coalition for Changes, and Gakharia for Georgia parties were targeted in these attacks. Notably, members of the National Movement faced violence and were unlawfully detained by the police on two separate occasions.

Economic Violence: The Rights Environment for Socially Vulnerable Individuals and Those Employed in Organizations with Budgetary Funding.

The pre-election environment is significantly influenced by the socio-economic context, which exhibits widespread signs of economic violence. In Georgia, there are over half a million registered socially vulnerable individuals and hundreds of thousands of citizens employed in organizations with budgetary funding (such as schools, kindergartens, outpatient clinics, various state/municipal LLCs and N(N)LEs, and others) - their rights environment is particularly noteworthy. The conducted focus groups and in-depth interviews indicate widespread economic violence, which may manifest differently across various groups. In some cases, instances were revealed where citizens were directly instructed to engage in activities favoring the ruling party on social media and beyond. In other cases, we received information about unlawful dismissals or threats of dismissal from employment. Simultaneously, citizens report the loss of various social benefits (such as student status, social assistance, housing, and others). Those who have not directly been the recipients of such threats are affected by a chilling effect, leading to self-censorship among citizens and restraint from fully realizing their electoral-political rights and freedom of expression.

Illicit influence on voter will: There have been efforts to pressure voters through various tested methods, including threats, intimidation, unlawful collection of personal data, confiscation of identity cards, bribery, and the offering or fulfillment of illegal promises. Two years ago, Transparency International Georgia and the International Society for Fair Elections and Democracy highlighted these methods in their joint

report, which drew on revelations from Ioseb Gogashvili, the former deputy head of the State Security Service.

Illegal scheme for collecting personal data from civil servants: On October 12, 2024, the investigative program Nodar Meladze's Saturday on TV Pirveli aired a report exposing secret lists of employees from ministries, municipalities, and other public institutions, as well as state and private companies affiliated with the government, along with their family members. The story revealed how public officials are instructed and coerced into collecting and submitting their personal data, along with that of their families, to the ruling party to ensure these individuals vote in favor of the Georgian Dream in the elections. Such actions exhibit characteristics of multiple offenses under the Criminal Code.

On October 23, the media outlet Tabula published an [audio recording](#) in which a kindergarten director threatened employees with job-related repercussions if they did not participate in a rally organized by Georgian Dream.

Illegal scheme for collecting personal data of tens of thousands of residents of Adjara: On October 15, the newspaper Batumelebi published an article detailing a series of incidents that corroborate the criminal schemes outlined in the 2022 report by Transparency International Georgia and the International Society for Fair Elections and Democracy, which involved the unlawful collection of personal data from tens of thousands of residents of Adjara. According to the article, Georgian Dream is meticulously processing special category personal data of tens of thousands of

individuals in the party's offices ahead of the elections. This claim is substantiated by documents provided to Batumelebi by a well-informed source.

4.4 Misuse of Institutional Administrative Resources for Electoral Purposes

Participation of ruling party candidates in budgetary initiatives: During the reporting period, there was a noticeable trend of utilizing various forms of institutional administrative resources for the benefit of ruling party candidates. As in previous elections, the participation of ruling party candidates in various events funded by the state or local budget was notable. These events often took the form of campaign activities. These instances were recorded nationwide, further highlighting the blurred line between the state and the ruling party in the lead-up to the elections. Typically, municipalities organizing various events - such as the opening of infrastructure projects, local festivals, or award ceremonies - gave the stage to publicly announced parliamentary candidates from Georgian Dream, many of whom were also serving as state-political officials. At these gatherings, Georgian Dream candidates often became the focal point of the event - addressing the public, inaugurating infrastructure projects, distributing awards, and more. As a result, budget-funded events were repurposed as campaign platforms for the ruling party's parliamentary candidates. While we have identified around ten such cases, likely, similar events occurred far more frequently.

Mobilization of civil servants at pre-election rallies: The widespread mobilization of civil servants and employees of other publicly funded organizations was a prominent feature at Georgian Dream pre-election gatherings. Given their subordination to political officials, there is a significant risk that these individuals are compelled to participate in the pre-election campaign against their will.

4.5 Misuse of Financial Administrative Resources for Electoral Purposes

Use of budget funds for the ruling party's election purposes: Transparency International Georgia has identified twelve distinct large-scale socio-economic initiatives undertaken by the Government of Georgia and various public institutions since July, which can be classified as election-motivated expenditures of state and municipal budget funds. In an environment where the distinction between the ruling party and the state is virtually nonexistent, such initiatives burden taxpayers while simultaneously favoring the Georgian Dream. An example of this type of spending is the decree from the Government of Georgia, which allocated 250,000 GEL from the government's reserve fund for the "appreciation of successful Georgians and the promotion of their professions." Another decree from the Government of Georgia allocated 20 million GEL to municipalities to fund local projects. Additionally, the Adjara government made decisions to assist socially vulnerable families, beekeepers, and families with twins, among others.

5. FINANCING OF PARTIES

5.1 Income and expenses of the parties

- During the pre-election period, the eight electoral entities analyzed reported total revenues of 18.8 million GEL, derived from budgetary financing, donations, and bank loans and their expenditures amounted to 25.3 million GEL. Notably, the Georgian Dream accounted for 53% (13.3 million GEL) of the total expenses of political parties.
- In the pre-election period, 94% (17.7 million GEL) of the total income received by political parties came from donations, while 6% (1 million GEL) came from state funding;
- Georgian Dream received 34% (6 million GEL) of the total political party donations during the pre-election period and 52% (13.4 million GEL) of the donations made since the beginning of the year.
- Since the beginning of the year, 40% of donors have contributed more than one year's average salary in Georgia (17,000 GEL per person). These donors account for 84% of the total donations received by all parties, indicating a significant dependence on large contributors.
- During the pre-election period, the parties spent a total of 17.7 million GEL on advertising, with 47% (8.3 million GEL) allocated to Georgian Dream. Strong Georgia spent 4.5 million GEL, while the Coalition for Change expended 4.1 million GEL.

5.2 Donations involving a high risk of political corruption

- From January 1, 2023, to October 17, 2024, companies affiliated with the ruling party's donors were awarded contracts totaling 684 million GEL. In return, these donors contributed 3.1 million GEL to Georgian Dream" in 2024.
- Notably, Gza LLC received contracts worth 226 million GEL in state procurement during 2023-2024. The company is owned by Giorgi Chkonia, a donor to Georgian Dream and a candidate for parliament in the upcoming 2024 elections. Together with his shareholder Malkhaz Dumbadze, Chkonia donated 75,000 GEL to the ruling party in 2024, contributing a total of 621,000 GEL since 2013.
- 32 beneficiaries of the state program Enterprise Georgia are donors to Georgian Dream, contributing a total of 1.6 million GEL to the party in 2024. From 2014 to 2020, these beneficiaries received a combined total of 7.4 million GEL through this program.
- In 2014-2023, 51 donors of Georgian Dream received a total of 71 million GEL in subsidies from state agricultural projects. In return, these donors contributed 7.7 million GEL to the ruling party during the same period, including 2 million GEL between January 1 and October 4, 2024.
- Individuals with family or business ties to Bidzina Ivanishvili contributed 425,000 GEL to Georgian Dream from January 1 to October 4, 2024
- Over the years, several large donor groups have emerged among the supporters of the ruling party, consistently contributing significant sums to Georgian Dream on the same days during each election cycle. For instance, on July 10-11, 2024, five owners of Nova LLC donated a total of 282,000 GEL to the party. Nova received 9.2 million GEL in

state contracts between 2023 and 2024, as well as 1.1 million GEL from the Enterprise Georgia program. Additionally, on July 4 and 12, 13 owners of Lilo-Mall LLC collectively contributed 558,000 GEL to Georgian Dream.

5.3 Supervision of Parties

- The Anti-Corruption Bureau's decision on September 24, 2024, to label Transparency International Georgia and its executive director, Eka Gigauri, as entities with declared election goals was both unlawful and highly damaging. This action has undermined the Bureau's credibility as the financial supervisory body for political parties, eroding public trust in its role.
- The head of the Anti-Corruption Bureau's reversal of his decision under the Prime Minister's public directive further underscores the argument that the Bureau does not operate independently from the government.

6. MEDIA ENVIRONMENT

6.1 General Description of the Media Environment

The Georgian media, especially their independent segment criticizing the government, faces significant challenges and problems ahead of the 2024 parliamentary elections. As noted above, during the pre-election period, the Communications Commission and the judiciary regularly fined critical broadcasters for refusing to air Georgian Dream's propagandistic and unethical political advertisements, as well as on other unlawful

grounds.

Access to public information remains a serious institutional challenge. Central and local authorities often unjustifiably refuse or completely ignore the majority of requests for information made by the media. The ruling party's boycott of critical media continues, causing particular damage to the process of properly informing voters.

There are frequent instances of representatives of the ruling party insulting and defaming journalists. Numerous cases of violence against the media or illegal interference in their professional activities remain uninvestigated, negatively affecting the media's work.

In parallel with the aforementioned challenges, the media are under the threat of the enforcement of repressive mechanisms of the "Russian law" adopted by the Georgian Dream. Such a hostile environment not only endangers independent media but also undermines the democratic process, restricts a pluralistic environment, and deprives Georgian citizens of the opportunity to make informed choices.

6.2 The Repressive Policy of the Communications Commission Towards Critical Broadcasters

As previously mentioned, an extremely negative role played by the Communications Commission against critical broadcasters - Mtavari Arkhi, TV Pirveli, and Formula - became particularly evident during the pre-election period. Over this period, the

commission has issued multiple offense reports against these broadcasters for refusing to air unethical and propagandistic election advertisements, in which civil society representatives were portrayed in an extremely discriminatory and degrading context. Based on the commission's decisions, the court [imposed financial fines](#) on these broadcasters.

Although the commission also issued few offense reports against pro-government channels, it left the impression that this was done in order to present the Communications Commission as a “neutral arbiter” in the eyes of international partners and observation missions. Overall, such decisions cannot neutralize or counterbalance the irreparable harm that the Communications Commission's actions have already caused to critical broadcasters and the pre-election environment in general.

It is noteworthy that the “Mediaombudsman” also negatively assessed the activities of the Communications Commission in its interim [report](#) published on October 5, emphasizing that the commission, along with the courts, became “complicit in punishing critical media outlets once again during the election period.”

The European Parliament also condemned the use of photos depicting the Russia-launched war in Ukraine in the Georgian Dream's election campaign, stressing in its [resolution](#) of October 9 that such a campaign was aimed at “manipulating opinions and spreading disinformation and pro-Russian and anti-Ukrainian sentiment.”

6.3 Parallel Structures Created to Discredit Independent Media

The creation of parallel institutions by the Communications Commission serves the aim of discrediting the media as a democratic institution. An example of this is the platform “Mediacritic” (mediacritic.ge) created under the commission. For years, this peculiar formation has been engaged in discrediting media outlets critical of the government.

According to the [latest research](#) by “Myth Detector,” 85.2% of the 139 articles published between March 1, 2023, and July 31, 2024, targeted media outlets not controlled by the government. In addition to disproportionate coverage, there were instances where criticism was aimed at justifying or defending government positions rather than setting professional standards.

Furthermore, “Mediacritic” ignores topics that concern the Georgian media landscape and the government’s influence on it and instead focuses on challenges and biases in Western media, creating a false picture that media are completely free of governmental influence in Georgia but face problems only in traditional democracies.

It is also worth noting that in the past, articles for the website were written by journalists from the pro-government propaganda media outlet POSTV and by pro-government experts, but now some of the authors publish under pseudonyms, whose identities the regulator does not disclose.

6.4 Restrictions on Access to Public Information

[Access](#) to public information is significantly restricted. Despite legal obligations, representatives of central and local governments often either do not respond to public information requests at all or provide it incompletely and in violation of legally prescribed timeframes. This issue is particularly acute during the pre-election period. Moreover, leaders of the Georgian Dream continue to insult media representatives when they are asked critical or uncomfortable questions.

6.5 Unequal Editorial Policy of Pro-Government Propaganda Channels and the Boycott of Critical Media by Electoral Subjects and the Ruling Party

During the election period, access to the media for electoral subjects was also severely unequal. Media outlets with pro-government editorial policies - Imedi, Rustavi 2, and POSTV - were closed to opposition parties and civil society. Moreover, members of the ruling party refused to appear on critical media outlets.

As a result, substantive and thematic political debates practically disappeared from the television space, depriving viewers of the opportunity to hear different opinions and reasoned discussions on important issues. Unfortunately, the Public Broadcaster also failed to organize political debates, although this is one of its direct obligations. This is particularly problematic in the pre-election period, as such a flawed practice leaves viewers without the opportunity to make an informed choice.

The editorial policy of the pro-government media was oriented not on informing voters but rather on opposing opposition parties, civil society organizations, the president, EU institutions, and the US domestic political process, and served to reinforce the anti-Western messages of the ruling party and promote its political agenda.

7. DISINFORMATION AND CAMPAIGNS TO DISCREDIT OPPONENTS

7.1 Targets of Disinformation and Main Propaganda Messages of the Ruling Party

During the pre-election period, the main targets of disinformation were political parties (mostly the opposition), journalists, and non-governmental organizations.

The ruling party manipulated fears of engaging in war and spread false information on this topic, accusing opposition [politicians](#), [journalists](#), and civil [activists](#) of calling for armed conflict. [Individuals](#) and the [media](#) critical of the Georgian Dream were discredited with labels such as “homeland-less” and “traitor,” and manipulative information was disseminated to reinforce these narratives.

7.2 Methods and Mediums of Disinformation

The most frequently used method for discrediting opponents was visual manipulation, which included [photo/video](#) editing, audio [manipulation](#), or [the out-of-context](#) dissemination of video commentary.

Politicians and individual Facebook users/pages were engaged in spreading false information about both the political opposition and the ruling party. It is noteworthy that the Georgian Dream used not only anonymous Facebook pages and accounts to spread disinformation and manipulative stories but also pro-government experts and media outlets with editorial policies favorable to the ruling party.

Coordination was observed between anti-opposition Facebook pages and accounts in the discreditation campaigns. These campaigns [involved](#) both long-ago-created and newly-registered pages/profiles, which used short videos (Reels), archive footage of politicians' statements, and satirical videos accompanied by offensive comments. Methods also [included](#) discreditation on the basis of gender identity and sexual orientation, hate speech, and [gender](#) disinformation.

The Facebook page "In Reality," created by the communications department of the Georgian Dream, and a new page created ahead of the election, "[Facts and Choice](#)," which is connected to a member of the political party People's Power and pro-government experts, were active in this campaign. Both pages present themselves as organizations fighting disinformation but aim to undermine trust in the opposition and

non-governmental organizations by publishing posts that discredit them, including false information.

“Myth Detector” [identified](#) three Facebook pages operating under the guise of regional media and one regional media outlet financed from the budget that were promoting the ruling party and spreading messages against the opposition.

There was also an attempt to discredit the October 20th march when a newly created page, which became active since October 15th, spread disinformation that the October 20th march was actually a “Pride” [planned](#) by the United National Movement. Furthermore, to undermine trust in independent, critical media, pro-government media spread disinformation, claiming that TV Pirveli and Mtis Ambebi had [covered](#) the October 20th rally using old footage.

7.3 Main Motives Behind Disinformation

A study by the Media Development Foundation, which examined anti-Western messages in traditional media, showed that the ruling party and political and media groups associated with it accused the West and the global war party, often used interchangeably, of interfering in the elections and delegitimizing the results, which they perceived as preparations for a revolutionary scenario.

The theme of manipulating the fear of war was linked to the theme of elections. The ruling party’s election message was built on the technique of a false dilemma, offering

voters a choice between war and peace, sovereignty and enslavement, loss and preservation of identity.

Among the political parties/coalitions, the highest number of anti-Western messages were disseminated by the Georgian Dream and the People's Power (1017), followed by the pro-Kremlin coalition Alt-Info/Conservative Movement/Alliance of Patriots/Georgian Idea (788), and the political party Solidarity for Peace (146).

Among the media outlets, the most anti-Western messages were found in the pro-Kremlin outlets Sezoni TV (318) and Georgia and the World (242), followed by the pro-government POSTV (182) and Georgia First (130). Among public organizations, the newly established public association, the United Neutral Georgia, which supports the government, spread the most anti-Western messages (229).

8. ELECTION DISPUTES

From August 20 to October 20, “Georgian Court Watch” monitored the hearings of pre-election disputes in courts, as well as the activities of the High Council of Justice. Monitors attended a total of 43 court sittings (36 cases). The following key trends were revealed as a result of the monitoring of court proceedings:

- The official website of the court system (ecd.court.ge) sometimes did not publish the schedule of sittings related to pre-election disputes. This was particularly

problematic at the Tbilisi Court of Appeals. It can be said that the mentioned court almost never published the schedule of hearings related to pre-election disputes.

- There were cases during the monitoring when the exact time and date of the start of the hearings indicated in the schedule did not match, which is a serious concern in terms of transparency of the courts.

- It is noteworthy that in almost all cases, judges sided with the positions of the Central Election Commission (CEC) or the National Communications Commission.

- In addition, in some cases, judges did not treat the parties equally, displayed bias, addressed a party harshly, or did not listen to all parties with the same attention.

- Disputes related to pre-election issues were assigned, among others, to new judges who were appointed in October 2024. This raises questions about whether these newly appointed judges have the competence to handle election disputes. For example, one of the new judges of the Tbilisi City Court, Zviad Gochashvili, has passed the judicial exam in criminal law and has undergone professional training specialized in criminal law.

- During the monitoring, there were instances where a judge did not explain the grounds for granting or rejecting motion(s).

- With regard to the organizational part of the court, it should be noted that in about 35% of the monitored sitting, the hearing of the case started with a delay.

During the reporting period, the High Council of Justice became an even more closed institution, as the attendance of NGO and media representatives at its sessions was restricted. The openness of the court system is particularly important during the pre-election period. However, the Council does not publish its decisions on its website and does not provide public information requested by NGOs or other interested parties.