RESHAPING THE ELECTORAL RUN TROUGH THE USAGE OF
SOCIAL MEDIA IN MONTENEGRO

FINAL REPORT
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Content

Introduction

Centre for Monitoring and Research (CeMI), in collaboration with the International Foundation for Electoral Systems (IFES), implemented the 2020 Montenegro Parliamentary Elections Social Media Monitoring Pilot Project aimed at improving the integrity of electoral process in Montenegro, protecting the right to freedom of expression in the digital space, while respecting the established rules of political advertising during the election campaign, as well as other standards and rules of online community, with focus on Facebook.

Given all the challenges posed by the development of digital technologies and the popularity and impact of social networks on shaping the public opinion, as well as the fact that due to the specific situation caused by COVID-19, political campaigns of the parties was predominantly conducted on social networks, the project was implemented primarily with the aim to protect voters and their right to an informed and free choice.

The main purpose of the monitoring was on determining online political behaviors and identifying possible deceptive foreign or domestic influence operations during the electoral process in Montenegro, and thus on the free choice and will of voters, but also on documenting cases of abuse of state resources through social media.

This Report presents the results of social media monitoring during the period from March till August of 2020. The main objective of the Report was to assess, based on collected data, the manner and rate of usage of social media in political campaigning in Montenegro with particular emphasis on adherence with Facebook Community Standards and digital rights of its users. Conclusions and recommendations, which are based on the identified shortcomings, and which are an integral part of this Report, suggest that the relevant institutions should implement appropriate measures in order to improve integrity of the electoral process in Montenegro.

This Report also presents the logical sequence of the Analytical Paper that was published within this Project as well. The two documents complement each other and together constitute a comprehensive analysis of law and practice. Analytical Paper can be found on the official CeMI website.

The Report consists of a brief methodology description that outlines the tools and metrics used for social media monitoring and provides general guidance of the purpose and scope of the project. The collected evidence is presented in the central part of the report, in particular regarding the Coordinated Inauthentic Behavior (CIB) and Abuse of State Resources (ASR). The final part of the document consists of conclusions and recommendations on how to improve the practice of adherence to the anti-corruption standards of fair elections in Montenegro.

Finally, we would like to express gratitude to our partners for their support in carrying out this phase of the Pilot Project activities relating to social media monitoring during Parliamentary elections, in line with the planned dynamics and methodology. We hope that this fruitful cooperation will continue in the future.

Methodology

Social media monitoring activities presented in this Report build on methodologies previously developed and implemented by the Stanford Internet Observatory (USA), Urbino University (Italy), and Memo98 (Slovakia). The methodology was adapted to the scope and aim of the research that CeMI developed in collaboration with IFES within the Facebook Pilot Project.

During the course of the implementation of social media monitoring activities, between March-August 2020, CeMI used Facebook's CrowdTangle platform to access public data available on Facebook. For the purposes of the research, CrowdTangle Link Checker extension and Ad Library features were also used. In the initial phase of the project implementation, CeMI staff was trained to monitor social media using these tools. By implementing a project of this nature, CeMI strengthened its capacity to monitor social media in a professional manner and in line with international standards. It is important to underline that CeMI is the first CSO in Montenegro to use this unique methodology and advanced tools such as: CrowdTangle, CrowdTangle Link Checker, Ad Library, to monitor social media during elections. This Report is the first of its kind published in Montenegro in regards to the Coordinated Inauthentic Behavior (CIB) and collection of evidence about online and offline abuses of state resources (ASR).

It should be highlighted that, for the purposes of this research, CeMI monitored Facebook only, as it is the most widely used social media platform in Montenegro. Because the national legislation in Montenegro does not regulate social media nor behavior on the Internet, CeMI's focus within this Report was on violations of Facebook Community Standards as well as identifying incidents that violate the established principles of election campaigning in Montenegro, though may not be accounted for in the current legal and regulatory framework. Therefore, it should be noted that scope of the work focused primarily on the examination of the behavior of various Facebook entities during the run-up to the 2020 Elections and whether it was in accordance with Facebook Community Standards.

The activities covered monitoring of the behavior of public Facebook entities, namely Pages (including political parties, politicians, and media outlets), Groups, and Meme pages and accounts. In this regard, CeMI monitored 135 public entities and 153.6K posts shared during the course of the Project.

When it comes to the monitoring of Coordinated Inauthentic Behavior (CIB), CeMI monitored 51 public entities (17 Pages, 8 Groups, and 26 Meme pages and accounts) and 134.6K posts shared during the period from March-August 2020. For the identification of the CIB network, we developed criteria for attributing entities we encountered to this network. If entity fulfilled at least two of these criteria, it was attributed to the network. Criteria are listed in the section analyzing the identified network.

In relation to the abuse of state resources (ASR), CeMI monitored 59 public Pages and Accounts (19 public bodies, 9 public companies, 20 political parties, and 11 profiles categorized as „politician") and 18,999 posts shared during the six-months period. Additionally, 25 media outlets were monitored in both cases, while analyzing behaviors that could suggest CIB and ASR on social media.

The metrics that were used in this Report are the number of page likes, post count, interactions[1], details about paid ads – all public data collected through CT platform, mainly using CSV data, Search, Intelligence, and Ad Library features.

During the monitoring, evidence was collected daily, while the CSV data was downloaded on a weekly basis. The data collected is the essence of this Report, which represents a systematized set of observations, with conclusions and recommendations.

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1 Interactions are users' reactions on post and include like, share, comment, heart, cry, haha, angry, etc.

Executive Summary

Montenegro held the Parliamentary elections on August 30, 2020. In the run-up to this election, Centre for Monitoring and Research (CeMI), in collaboration with the International Foundation for Electoral Systems (IFES), developed a methodology for the monitoring of social media during the election period. The monitoring was conducted primarily with the aim to protect voters' right to free and informed choice.

When it comes to the CIB, CeMI identified a network of 51 Facebook entities linked to groups and individuals outside Montenegro. We suspect that the network was engaged in Coordinated Inauthentic Behavior (CIB) with the aim to influence political topics concerning Parliamentary Elections on August 30, 2020. Notable tactics of the network included the use of false accounts posting similar or identical content across multiple Pages and Groups in the network. Although much of the content appeared to be related to elections and politics, with many entities promoting specific political narratives in the lead-up to

2020 Elections, the network was sharing content in violation of Facebook's Community Standards, namely hate speech and threats of violence toward minority groups (LGBTIQ population) as well as national minorities (Croats, Muslims), denial of genocide and celebration and affirmation of war criminals (Srebrenica case). Most of the Pages/Groups within the network were created or changed their names in a short period of time. Also, some of the administrators, moderators, and members of the Pages, Groups and Meme accounts involved were located outside of Montenegro that suggest network may be directed by or acting in coordination with foreign actors.

Concerning the ASR, through this monitoring we collected evidence of the cases of abuse of state resources with the focus on the abuse of institutional resources[2] and the usage of state's official accounts during the elections. The aim has been to track online behaviors in order to identify potential threats to Montenegrin democracy and electoral system.

KEY FINDINGS

1. Social media activity around Montenegrin politics has surged since the election period began. Political activity increased 51% on Facebook from the period before elections.
2. The suspected CIB network that was identified shared politically motivated content, in many cases containing inappropriate, defamatory, and hate speech content, often in a coordinated manner with certain news portals/media outlets, political parties, and politicians.
3. The CIB network formed a densely connected network with many suspected fake profiles.

Some administrators, moderators and members of Pages, Groups, and Meme accounts are members of foreign political parties which suggests political motivation and foreign actors' engagement.
4. Abuse of state's social media accounts and state employees's profiles on social media for political purposes was visible through electoral period.
5. Number of investments during the campaigning period increased by 79% compared to the pre-election period.

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2 *Reshaping the electoral run through the usage of social media in Montenegro,* Analytical Paper, CeMI-IFES, 2020

1. Coordinated Inauthentic Behavior

Social media and networks have probably become the most important tools for organizing both online and offline social movements thanks to their role in facilitating collective action.[3] In recent years, social media has played a crucial part in organizing online disinformation campaigns such as the Covid-19 related ones, as well as massive offline protest, popular social and political movements such as the "Yellow Vests" in France and "Friday for Future" in several other countries.[4] It is obvious that, in the online environment, coordinated networks and behavior of social media activists can facilitate the pursuit of communication goals.[5]

Recognizing the importance of social networks when it comes to the communication and interaction, Facebook developed a set of Community Standards that outline what is and is not allowed on Facebook. Standards introduced the concept of Coordinated Inauthentic Behavior (CIB), focusing primarily on protection of integrity and authenticity of the users on the platform.

Coordinated Inauthentic Behavior (CIB) is defined as "groups of pages or people working together to mislead others about who they are or what they are doing".[6] This threat, however, is not limited to a specific type of technology or service and has far-reaching repercussions.[7] The CIB in itself does not include the assessment of the veracity of content as the posts themselves may not be false and may not go against community rules or standards, but the attention is on the deceptive behaviors of the actors within the net-

work.[8] For example, the network may be taken down „for making it look like it's being run from one part of the world when in fact it's being run from another. This could be done for ideological purposes or can be financially motivated. "[9]

The people behind CIB coordinate with one another and use fake accounts to misrepresent themselves.[10] The network often uses compromised and fake accounts to run Pages – some of which change names and admins – disseminate their content, comment in Groups, and artificially increase engagement in targeted countries.[11]

What's clear is that, while social media companies improve user's protection policies, the people behind CIB – whether economically or politically motivated – change their tactics and improve, too.[12] They are well-funded and have every incentive to continue their efforts, even if some of their actions have very little impact.[13]

Topics like natural disasters or celebrity gossip have been popular ways to generate more interactions with users, but today, CIB networks increasingly use sensational political content – regardless of its political slant – to build an audience and create a false impression of massive scale and reach.[14] And like the politically motivated activity we have seen, the "news" stories or opinions that these accounts and Pages share, are often indistinguishable from legitimate political debate.[15]

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3 Earl, J., *The dynamics of protest-related diffusion on the web, Information,* Communication & Society, 13:2, 209-225, 2010,DOI: 10.1080/13691180902934170

4 *Idem*

5 Giglietto, F., Righetti, N., Marino, G., *Understanding Coordinated and Inauthentic Link Sharing Behavior on Facebook in the Run-up to 2018 General Election and 2019 European Election in Italy,* LaRiCA - University of Urbino Carlo Bo, 2019

6 Gleicher, N., *Inside Feed Coordinated Inauthentic Behavior,* Facebook, 2018

7 Last week takedowns, Facebook, November 2018

8 See *supra* note 5

9 See *supra* note 5

10 Gleicher, N., *Removing Coordinated Inauthentic Behavior in UAE, Egypt and Saudi Arabia,* Facebook, 2019

11 *Idem*

12 Gleicher, N., Rodriguez, O., *Removing Additional Inauthentic Activity from Facebook,* Facebook, 2018

13 See *supra* note 6

14 See *supra* note 6

15 See *supra* note 11

For this reason, internationally many CIB cases were identified during and after the elections. It is especially critical in the lead-up to the elections and foreign interference during elections is likely to happen.[16]

During the period of 6 months (from March-August 2020), CeMI identified a network of Facebook entities linked to individuals in Montenegro, suspected of engaging in Coordinated Inauthentic Behavior (CIB).

1.1. Findings: The network

The identified network of entities is neither small nor subtle. We first identified a number of public Pages because they were among the ones to have links to the certain media outlets known to lack credibility (searchable through the CT Link Checker). It quickly became evident that there were dozens of other Pages and Groups interacting with these Pages in a coordinated fashion: similar posts and images, amplified by meme accounts that shared the same profile picture.

Based on tested methodology, we developed criteria for attributing entities we encountered to this CIB network. We attributed entities to the CIB network if they fulfilled at least two of these criteria:

- Matching patterns in Entity metadata, including creation date, name change date, or administrator location.
- Entity category is defined as non-political (e.g., art, fun, legal, etc.) while sharing political content and promoting certain political narrative.
- Sharing the posts/link/news in coordination with same media outlets, political parties, and politicians.
- Sharing more than one post (text, photo, video) from another network entity. In a subset of entities, we found that this took the form of highly coordinated post times and content.

Image 1: Accounts that shared the same profile picture. Facebook accounts "Crnogorski mudroseri ", „Бестебе" and „Without You "

16 See *supra* note 6

The identified CIB network is composed of 51 entities in total, 17 of which are Pages, 8 Groups and 26 Meme accounts. Most of the entities in the network were created at the end of 2019 or the beginning of 2020, with 13 created during the period from January-February 2020. Additionally, most of the entities changed their name in the period from January – March 2020. These changes were not drastic in meaning but were changes from Latin to Cyrillic script.

From March-August 2020, the network marked growth of +302.1K new pages likes, with notable spikes in May and July, counting a total of 536.2K page likes. Bearing in mind that there are 381.8K Facebook users in Montenegro[17], we note that some of these likes are likely the same person across multiple entities, as well as from the outside of Montenegro.

During the period from March - August 2020, the iden-

tified CIB network created a total of 134.2K posts and generated 16.1M interactions, with the total number of 64.7M post views.

In continuation, the graphical presentation shows the three clusters (Pages, Groups, Meme accounts) within this network and the relation between likes (followers) and interactions each cluster generated. The size of the cluster (circle) is based on post activity data. The graph implies that the cluster of Pages was the most active one and had the most followers. The identified cluster of Meme accounts had significant number of followers and was active, but it generated the least interactions in the network. The cluster of Groups was the least active and had less followers than other two clusters, however, it generated the most interactions which suggests that the members of the groups were the most engaged in the network.

Chart 1: The network. Relation between likes (followers), interactions, and post activity of each cluster.
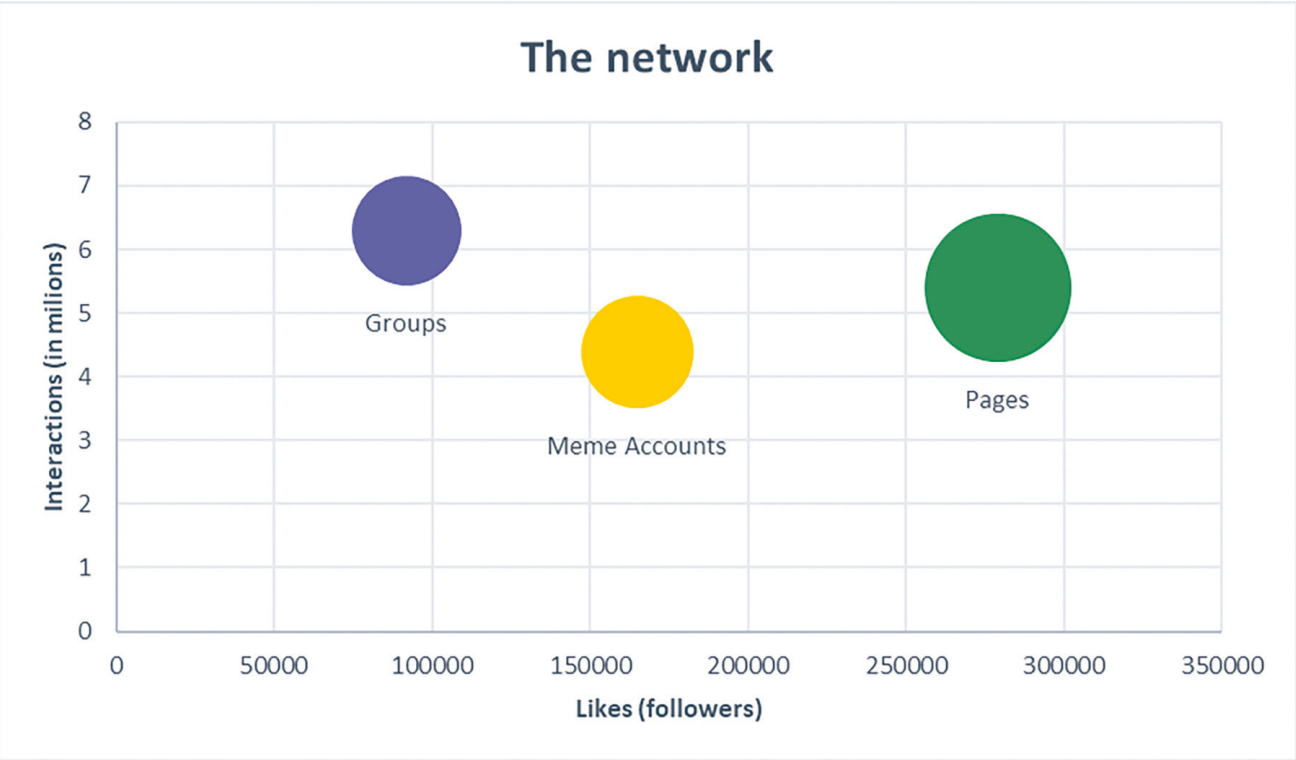
The network displayed forms of coordination, including repeating posts across several entities. For example, the content in Image 2 (see below) was posted almost simultaneously on June 19 on at least three entities in the network. It is important to mention

here that entities in the network did not share identical posts but usually each one created its own while the message they spread and promoted was the same across all other entities. With this tactic, it is hard to track all the shared posts within the network.

17 Statista, January 2020

Image 2: Coordinate post sharing. Media outlets „Sputnik Србија", „Informativni portal IN4S", „Borba.me", Facebook accounts „Vladislav Dajković", „Ne budite dio tog ludačkog pokreta", „It was very unpleasant/Psalam 118", and group „Подршка Митрополиту Црногорско-приморском г.Амфилохију Радовићу "
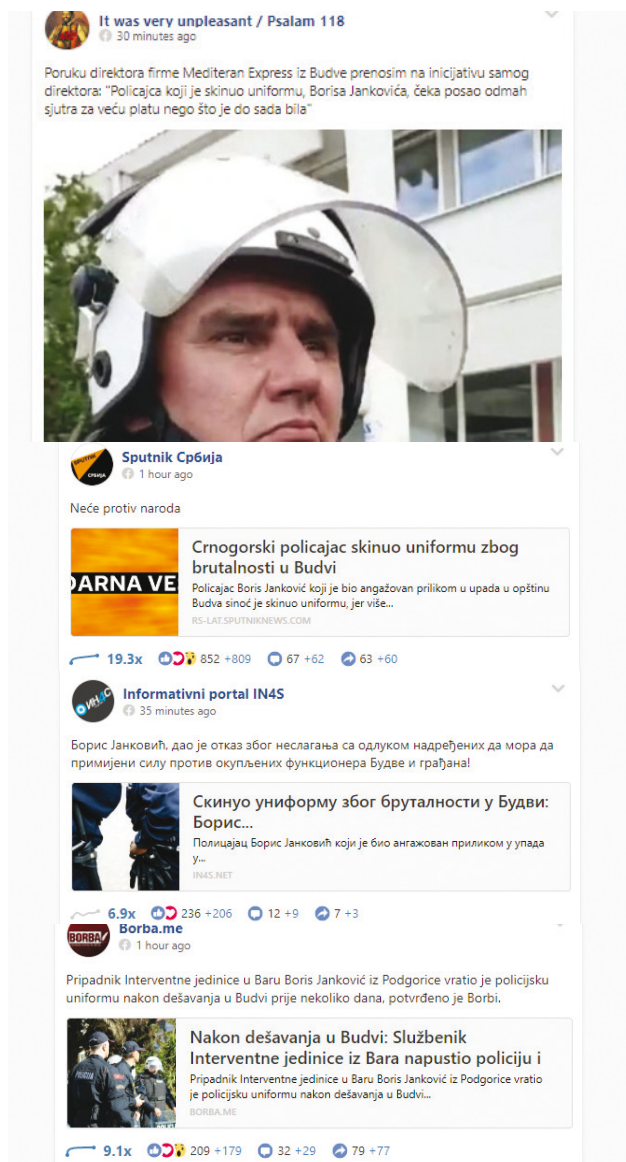
Additionally, the suspected CIB network demonstrated violations of Facebook Community Standards concerning the undesirable content, as entities' posts, in many cases, contained elements of defamatory and hate speech[18].

It is important to notice here that even though Facebook is committed to removing hate speech and on average 288,000 posts reported for hate speech are deleted per month globally[19], Facebook was criticized for inconsistance in enforcing Community Standards and its content-moderation process. Many articles have showen that Facebook has erred on the side of allowing users, in particular politicians, to post whatever they want, even when this has led Facebook to weaken its own rules, to apply them selectively, to creatively reinterpret them, or to ignore them altogether.[20] But a recently version of the Community Standards reveals that, by 2017, Facebook had weakened its rules—not just for politicians but for all users.[21]

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18 Standard 12. Hate Speech - "We do not allow hate speech on Facebook because it creates an environment of intimidation and exclusion and in some cases may promote real-world violence. ", Facebook Community Standards, 2020

19 Allan R., *Hard Questions: Who Should Decide What Is Hate Speech in an Online Global Community?* Facebook, 2017

20 Marantz A., *Why Facebook Can't Fix Itself,* The New Yorker, October 2020

21 *Idem*

Image 3: Examples of undesirable content. Facebook Accounts "Српска Црна Гора", "До Христове Побједе – Илија Вујовић", "Ne budite dio tog ludačkog pokreta", and „It was very unpleasant/Psalam 118"

As coordinated posting activity is common across the network, we identified three clusters of entities within the network which exhibited highly coordinated posting activities. For the purposes of clarity, we separated them in clusters according to the type of entity: Pages, Groups and Meme accounts, and analyzed their link-sharing behavior which suggests coordination efforts.

1.1.1. **Pages**

The total number of public Pages we identified within this cluster is 17 with a total 279.2K page likes. From March – August 2020, Pages posted a total of 25.4K posts, or an average of 3,772 posts per month. The data shows that 46.5% of total posts were Links, 33.1% Photos, and 15.3% Facebook Videos.

The Pages are categorized as Community, Community Organizations, Personal Blog, Education website, Charity Organization, Religious Organization, Legal, Public, and Government Service.

The cluster generated a total of 5.4M interactions. Photos caused the most interactions among the followers (2.3M), followed by Facebook Videos (2.1M) and Links (423.7K). This cluster of 17 Pages created and shared 2.800 Videos with total of 32.3M views.

Table 1: List of identified Pages within the CIB network with the number of Page likes and total interactions.

| Page/Group Name	Page Likes	Total Interactions
Историја Србске Црне Горе	55,675	708,646
До Христове Побједе-Илија Вујовић	26,717	1,591,724
Црна Гора и Србија, то је једна Фамилија	21,419	556,040
Српска Црна Гора	13,696	569,244
Ne damo Svetinje	28,036	122,790
Не дамо светиње	16,849	437,433
Срби у Црној Гори	33,804	353,183
Никшић Поносни Српски град	21,531	96,375
Црна Гора, Српска и Србија то је једна Фамилија	8,209	332,968
Podgorička gospoda	10,729	116,480
СРПСКИ ХЕРЦЕГ НОВИ	3,214	97,692
Ludački pokret Ne damo svetinje	4,973	48,079
Српско Племе Цуце - Srpsko Pleme Cuce	1,939	7,042
Srpska CRNA GORA	526	146
PLEME VASOJEVICI	16,610	188,471
Moj Niksic	14,044	60,427

Source: Author prepared table based on data available on Crowd Tangle.

Through the analysis of the data collected using CrowdTangle, we also examined the link-sharing behavior within the cluster. In essence, we used the data from CSV files to track link sharing patterns among entities. By analyzing the content of Pages in this cluster, posted during the period from March-August 2020, we collected and determined a set of link-shares by different entities. Some of the entities are within this cluster, some within other clusters analyzed in this Report, and some are external entities which do not fall under the scope of this research but are appearing in each of the three clusters identified in this research, which further raises concern about coordinated operations of the network. The data that we had collected is graphically presented below.

The graphic implies that Pages created dense link-sharing network together with political parties, politicians, political organizations, media outlets, meme accounts, religion-related pages, that were involved in spreading of the same contents suggesting coordinated behavior background.

Image 4: Link-sharing behavior. Pages
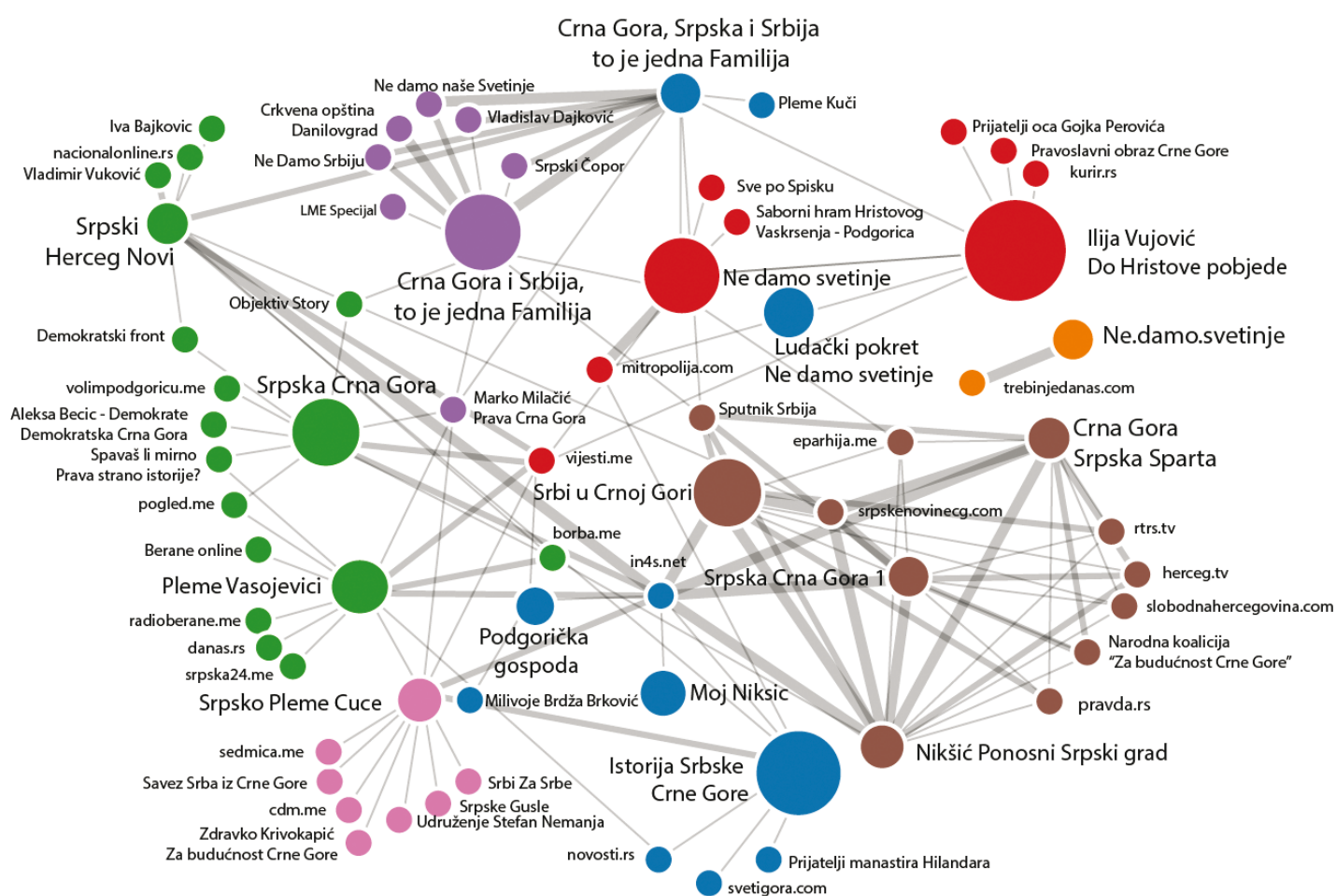
* Different color represents different communities created within the cluster. One color (community) is a group of entities in a cluster that have more connections to each other than to other entities outside the community, but inside the cluster.
** The size of the circles depends on the post activity of the entity.
*** The size of the connection lines depends on the number of same links shared between entities.

Source: Author prepared table based on data available on CrowdTangle.

1.1.2. **Groups**

The total number of identified groups in this cluster is 8, with 92.4K members. Members of the groups posted a total of 94K posts, or the average of 13,932 posts per month during the period from March-August 2020. The majority of total posts were Photos (40.52%), followed by Facebook Videos (25.76%), and Links (18.8%).

The cluster of groups generated 6.3M interactions, of which the most interactions related to Photos (3.72M), Facebook Videos (1.33M), and Links (718.3K). When it comes to the Video posts, the cluster posted 2,388 Videos with total 167.7K views.

While analyzing the abovementioned cluster of Pages, we have noticed that Pages' admins few times appeared as admins of Groups we analyze here.

Table 2: List of identified Groups within the CIB network with the number of Group likes and total interactions

Page/Group Name	Page Likes	Total Interactions
Лудачки покрет Не дамо светиње	765,379	1,055,547
Подршка Митрополиту Црногорско-приморском г.Амфилохију Радовићу	3,683,126	4,617,981
ВАСОЈЕВИЋИ НАЈВЕЋЕ СРПСКО ПЛЕМЕ	608,128	865,573
Српска Црна Гора	121,564	174,874
Отац Гојко Перовић-Православни Образ Црне Горе	818,629	1,067,605
СРБИЈО ЛИТИЈЕ ТЕ ЗОВУ	124,396	175,062
Светосавски Покрет Црне Горе	78,837	113,687
Отпор диктаторском режиму у Црној Гори - Грађанска непослушност	43,626	56,855

Source: Author prepared table based on data available on CrowdTangle.

What follows is the graphical representation of the link-sharing behavior of this cluster. The same methodology was used as for the previously presented cluster of Pages.

The graphic shows that Groups were not only sharing links among themselves but with the political parties, politicians, media outlets, pages analyzed previously in this report, meme accounts, religion-related profiles, etc. It is interesting to notice that a set of the same entities appear in link-sharing patter of both Pages and Groups clusters indicating the existence of coordination behind the network's behavior.

Image 5: Link-sharing behavior. Groups
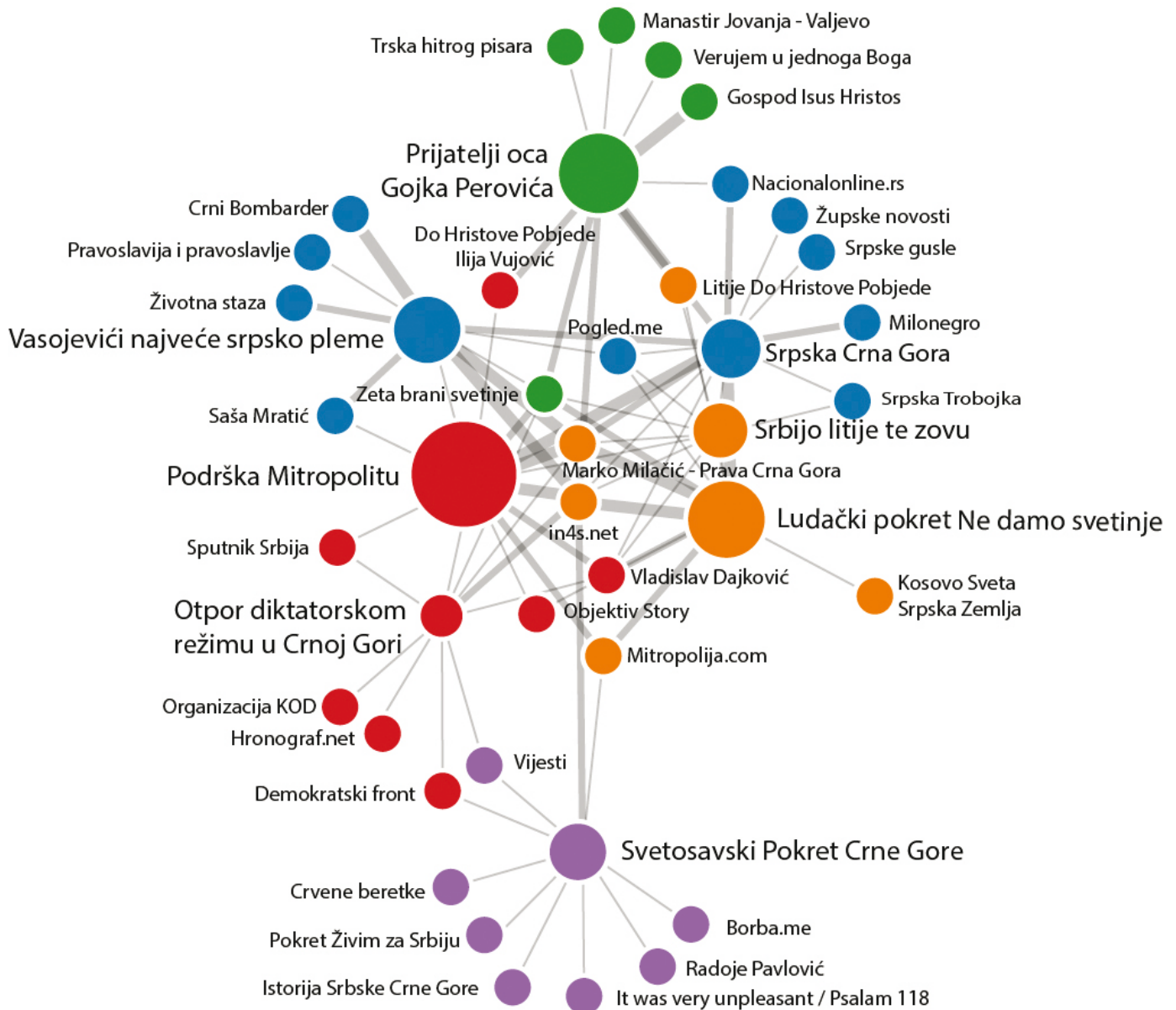
* Different color represents different communities created within the cluster. One color (community) is a group of entities in a cluster that have more connections to each other than to other entities outside the community, but inside the cluster.
** The size of the circles depends on the post activity of the entity.
*** The size of the connection lines depends on the number of same links shared between entities.

Source: Author prepared table based on data available on CrowdTangle.

1.1.3. **Meme Accounts**

The most interesting cases among non-political public Pages and Groups we identified are those apparently related to satire and entertainment. Namely, social media "entities" that aim to influence political opinion, may have a strong incentive to do so without revealing their true goals.[22] Furthermore, it is much easier to build a large follower base by presenting the entity as if it were dedicated to entertainment and popular culture than politics.[23] Once the follower base is established, the pages and groups can be used to convey political content to a largely unguarded audience.[24]

The number of Meme Accounts identified in this cluster is 26[25] with a total of 164.6K page likes. During the period from March-August 2020, Meme accounts created 14.7K posts, which is 2,172 monthly posts on average. Most of the posts were Photos (59.7%), followed by Statuses (25.6%), and Facebook videos (9.5%).

The cluster generated a total of 4.4M interactions. Namely, the posts that the audience interacted the most with were Photos (2.6M), Statuses (1M), Facebook Videos (614.4K). Cluster posted a total of 1,124 videos with 23.6M of total views.

Table 3: List of identified Meme accounts within the CIB network with number of likes and total interactions.

Page/Group Name	Page Likes	Total Interactions
It was very unpleasant / Psalam 118	18,643	1,806,246
Spavaš li mirno Prava strano istorije?	23,924	578,878
МИМистарство оностраних послова	14,588	443,186
LOŠI Glumci	14,008	394,170
Nemojmo politizovati proteste	7,724	357,674
Бестебе	2,051	5,835
Ne budite dio tog ludačkog pokreta	3,406	187,502
Splačinijada 2020	6,125	176,340
Црмничке мудрости	4,825	109,675
Мим Фабрика II	6,013	79,520
Ekološka država CrnaGora	1,458	53,384
Milonegro	2,410	38,901

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22 See *supra* note 2
23 See *supra* note 2
24 See *supra* note 2
25 Two Meme accounts we identified were deleted in August 2020, thus we did not include them in this Report.

Page/Group Name	Page Likes	Total Interactions
Veliki CG Brat	3,334	37,451
Dnevna doza crnogorskih dubioza	15,058	35,369
Nezavisni analiticar	2,084	29,798
Nismo mi takav lokal: Воскресение	1,731	22,090
Noches de Rozhae / Rožajske noći	2,063	19,143
MIM je naša nacija.	1,473	16,391
Stari Liberal	21,628	11,794
Crnogorski Mudroseri	1,404	9,784
WithoutYou	2,051	5,830
Izdajnik	2,595	4,279
Бунт Црна Гора	1,543	3,915
Хајдук ЦГ	3,451	3,793
Šaner	1,048	1,786
Djeca Gospodara /mim stranica koja nema veze sa Starim i Neprijatnim	527	678
Bilo je jako nebitno	1,440	66
Nismo mi takav lokal - DELETED (August 2020)		
Ljubomir - DELETED (August 2020)		

Source: Author prepared table based on data available on CrowdTangle.

Identified Meme accounts shared content concerning Montenegrin politics, in many cases in satirical and "funny" way. They also explicity stated they acted in coordination and thanked members of certain political parties for supporting them and vice versa. Through their contents they promoted certain political coalitions and expressed their "personal" preference about politics and parties.

It is important to notice that Meme accounts and pages are not personalized, thus, any opinion brought may not explicity represent the personal opinion of the individual managing the page but may be motivated by other reasons, such as financially. Consequently, the main issues here are the manipulations of voters such as creating the illusion of massive support or the popularity of certain subjects in order to bring in genuine support, as well as the spread of disinformation/fake news/misinformation.

Image 6: Examples of politically related content shared by Meme accounts. Facebook Accounts "Ekološka država CrnaGora", „Бестебе", „It was very unpleasant/Psalam 118", and "МИМистарство оностраних послова"

Ekološka država CrnaGora
12 hours ago

Što se izbora tiče! Lično podržavamo veliku koaliciju (DF, SNP, PRAVA, NARODNI POKRET). Naravno da ljudi imaju potpuno pravo da podrže druge iz opozicije. (DEMOKRATE, DEMOS) pa čak i URA su stranke koje treba podržati. URA prije svega zbog toga što je dosta bolja i ima dosta časnih ljudi za razliku od SDPa. URA je prava građanska stranka i članovi stranke su različitih nacija. Dok koalicija na čelu sa Demokratama je pomiješana i građanski i prosrpski. A koalicija okupljena oko DFa je većinski prosrpska. Trudićemo se da ove gore koalicije i stranke ne kritikujemo bez potrebe, jer vjerujemo da oni mogu smijeniti kriminalni režim.

Бестебе
2 weeks ago

Bato samo reči!

Марко Бато Царевић @zabudvu2020 · 20m

Hvala mim stranicama i autorima mimova 💪😂

OD😆 548   O 0   1

It was very unpleasant / Psalam 118
37 minutes ago

Ko je Pavle Korčagin? Govno neko rusko sigurno koje se očigledno petlja u unutarnje tvari jedne neovisne države!

Pavle Korčagin · 🔔
2 hrs · ⚙

Vreme je da se pomerite sa Vračara i p...See More

Кафана Павле Корчагин плаћа 10 повратних аутобуских карата за Србе који имају право гласа на предстојећим изборима у Црној Гори, а из неких разлога нису у могућности да остваре бирачко право и допринесу ослобођењу српске Спарте.

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МИМистарство оностраних послова
1 day ago

Како рокају мимсердари, а? Координисано, у исто вријеме преплављују интернет спотом који разара непријатеља дубински, изазива панику, дефетизам и расипање у његовим редовима. Што каже Ристовски у Подземљу: Распамети!!!

ефикасност спота са багером који руши манастир који су јутрос објавиле мим странице

ефикасност свих спотова цјелокупне опозиције

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As in the previous sections, in continuation, we graphically present the link-sharing behavior of this cluster. The graphic implies that Meme accounts established link-sharing pattern with the same entities previously analyzed within Pages and Groups clusters. In this case, however, the link-sharing network is not so dense as the previous two clusters due to the tactic of meme accounts that implicates creation of own content with the message that is supposed to be spread rather than simple link sharing, as explained in the introductory part of this section. Because of this tactic it is also difficult to track all connections and same contents shared within the cluster and identify external entities.

Image 7: Link-sharing behavior. Meme accounts

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* Different color represents different communities created within the cluster. One color (community) is a group of entities in a cluster that have more connections to each other than to other entities outside the community, but inside the cluster.
** The size of the circles depends on the post activity of the entity.
*** The size of the connection lines depends on the number of same links shared between entities.

Source: Author prepared table based on data available on CrowdTangle.

1.2. **Foreign Links**

Using Facebook Ad Library feature, we collected data about the number and location of the account administrators. However, the administrator's location is not necessarily an accurate representation of where the admins are located, as some of them might use VPN software to hide their computer IP address, which obfuscates their exact location.

Bearing in mind this limitation, as well as the fact that some pages did not provide the information on their admins, the public data that was available to us, demonstrated that most admins are from Montenegro (69), Serbia (8), Germany (3) and USA (1).

However, we further analyzed and identified that members of the groups/pages are in many cases located outside of Montenegro, with many fake profiles. We determined this by analyzing profiles that were frequently posting and participating in the monitored groups'/pages' discussions. As the scope of our work focused on the investigation of coordinated behavior, we did not go further in proving the evidence of inauthenticity of the network, i.e., how many profiles following and interacting within the network are fake.

The analysis has shown that administrators, moderators, and group members of the entities within the network expressed support for and few are members of foreign political entities, which is an information that they shared on their public profiles.[26]

2. Political parties and campaigning

Given the situation with COVID-19, social networks played an even more important role during the electoral process for the 2020 Parliamentary Elections in Montenegro. Although social networks were part of the campaigns of political parties during the previous elections, the 2020 Parliamentary Elections were characterized by the central role of the Internet in political strategies and the electoral process.

As social media becomes an increasingly important tool during election campaigning, it is crucial to find ways to monitor other campaign violations that may occur in this space.[27] Given that regulations on the use of social media in campaign periods are nascent in most countries and that monitoring and oversight of political advertising on social media are limited as well, the opportunities for parties and candidates to abuse these channels of communication may increase as a larger share of campaigning happens online.[28] Bearing in mind that during political campaigning on social media, in the countries where social media campaign strategies are less prominent, political parties and candidates are unlikely to exceed spending limits through their use of Facebook and similar services.[29] Additionally, political entities may commit other violations on social media that may constitute abuse of state resources.[30] Social media is also a useful tool for documenting further ASR violations like the use of state cars or government offices during campaigns.

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26 The Alliance of Serbs from Montenegro (Serbia), New strength of Serbia (Serbia), Serbian Party Zavetnici (Serbia).

27 Ohman, M. (Ed.), *Training in Detection and Enforcement (TIDE): Political Finance Oversight Handbook,* International Foundation for Electoral Systems (IFES), 2013

28 Vickery, C., Canterbury, A. (Eds.), *Preserving Electoral Integrity During an Infodemic,* International Foundation for Electoral Systems (IFES), 2020

29 See *supra* note 21

30 See *supra* note 21

Abuse of state resources is defined as "the undue advantages obtained by certain parties or candidates, through use of their official positions or connections to governmental institutions, to influence the outcome of elections".[31] These abuses are crucial for electoral process as they can compromise the integrity of an election, and reduce public trust in the legitimacy of the process and its outcomes.[32]

This chapter of the Report gives us an overview of how political parties used their social media accounts for campaigning, as well as how the official social media accounts of the Government and ministers were used during the electoral period. Additionally, the aim of the chapter is to provide e-evidence on documented cases of potential abuse of state resources.

In order to give a complete picture of political behavior online and documented cases of abuse of state resources, we first present the overview of the political parties' presence on Facebook and their activity during 2020 Parliamentary elections in Montenegro. The Chapter concludes with presentation of e-evidence, e.g., evidence collected while monitoring social media that suggest potential ASR during 2020 electoral campaigning in Montenegro.

For the purposes of the following section of this Report, public profiles of 20 political parties[33] and 11 politicians[34] were monitored, primarily their activity and advertising on the Facebook platform in a period of 6 months, from March – August 2020. Within the chapter, we analyzed their popularity/presence on Facebook (number of likes), the extent to which they are active (number of posts), the type of content that causes the most interactions (image, video, link), as well as paid ads.

2.1. Political parties and campaigning

When it comes to the Montenegrin political parties on Facebook, Prava CG (76,075) had the most likes[35], followed by DF (53,704), DCG (46,787), URA (33,991), DPS (30,890). In the observed six-month period, an average increase of 11% in the number of political parties' page likes on Facebook was recorded.

In the six-month period, political parties published about 11,743 posts and achieved a total of 9.3M interactions on the Facebook platform. It is interesting to note that 7.7M, or 82% of the total number of interactions in this period were generated by only three political parties, namely Prava CG, DF and DCG.

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31 Handbook for the Observation of Campaign Finance, Org. for Sec. and Co-operation in Europe (OSCE)/ Office for Democratic Inst. and Human Rights (ODHIR), 2015

32 Speck, B., Fontana, A. Milking the system: Fighting the Abuse of Public Resources for Reelection 1, CHR Michelsen Institute (CMI)/ U4, U4 Issue No. 7, 2011

33 *Demokratska partija socijalista Crne Gore, Demokratski front, Aleksa Becic - Demokrate - Demokrata Crna Gora, Građanski pokret URA, Marko Milačić – Prava Crna Gora, SNP - Socijalisticka narodna partija Crne Gore - СНП ЦГ, Socijaldemokratska partija Crne Gore – SDP, Socijaldemokrate Crne Gore, Нова српска демократија, Bošnjačka stranka, Ujedinjena Crna Gora - Zvanična stranica, DEMOS - Miodrag Lekić, Radnička partija, Pokret za Promjene, Liberalna partija Crne Gore – LPCG, Demokratska Narodna Partija, Hrvatska građanska inicijativa, Koalicioni shqiptar "Bashkë nji zâ " - PD, UDSH dhe LD në MZ, Hrvatska Reformska Stranka Crne Gore, Jugoslovenska Komunistička Partija Crne Gore*

34 *Milo Đukanović, Dritan Abazović, Zdravko Krivokapić - Za budućnost Crne Gore, Vladislav Dajković, Damir Šehović, Draginja Vuksanović, Nik Gjeloshaj, Andrija Popović, Milutin Simović, Ivan Brajović, Genci Nimanbegu*

35 After the elections and at the time of writing of this Report, this page was removed/deleted. However, data about the page was collected during the monitoring period when the page was still active. It is also important to note that the new page with the same name was created on September 9, 2020.

Image 8: The Popularity of political parties on Facebook. Top 10 political parties on Facebook by the number of interactions

	Marko Milačić - Prava Crna Gora	4.4M
	Demokratski front	1.93M
	Aleksa Becic- Demokrate - Demokratska Crna Gora	1.39M
	Građanski pokret URA	347,756
	Demokratska partija socijalista Crne Gore	341,526
	SNP - Socijalisticka narodna partija Crne Gore - СНП ЦГ	271,092
	Socijaldemokrate Crne Gore- SDP	183,034
	Socijaldemokratska partija Crne Gore	100,113
	Нова српска демократија	70,302
	Bošnjačka stranka	62,974

Source: Author prepared table based on data available on Crowd Tangle.

In the same period, these three political parties were amongst the most active. Namely, DCG posted on average 10 posts per day, followed by DF (9), SNP (9), Prava CG (8), DPS (5), URA (4), New Serbian Democracy (3), SD (3), and SDP (3). The post activity after the announcement of the election on 20 June is more than double what it was before the announcement, making the increase in post activity more than obvious.

The parties that were least active in this six-month period were Croatian and Albanian minority parties: HGI (0,68), HRS (0,45), Albanian Coalition (0,19).

The content most often shared by political parties were Photos (40%), Links (29%), and Videos (26%). What generated the most interactions were videos, followed by photos and Facebook live. Political parties count a total of 107M of post views.

By analyzing the shared content, the main topics discussed by the political parties were: 1) the ruling party, especially the leaders of the ruling party; 2) corruption and organized crime (affairs); 3) Covid-19.

Namely, the opposition parties shared the most content critical to the Government of Montenegro, i.e., the ruling party and their leaders. In this regard, the adoption of the Law on Freedom of Religion, which was adopted in December 2019, was often mentioned.

Also, a large number of posts were related to the organized crime and corruption, and various scandals. These topics were also predominantly posted by opposition parties.

The current Covid-19 pandemic was a topic that the ruling party dealt with, focusing also on the positive results achieved during their mandate. It was also one of the topics of the opposition parties, mostly in negative context and critical of the work of the NCT and the Government's action in dealing with the pandemic.

By analyzing the official pages categorized as "politician", the most active was Vladislav Dajković profile with a total of 475 posts and 3M interactions in the period from March-August 2020. followed by Milo Đukanović with 349 posts and 541,788 interactions, Nik Gjeloshaj with 319 posts and 55,236 interactions and Damir Šehović with 221 posts and 78,802 interactions.

The least active was Dritan Abazović with only 50 posts, but 158,564 generated interactions.

However, it has been noted that a lot of content created and distributed by opposition parties, especially their promotional videos and paid posts, contained deceptive practices to discredit opponents. Namely, the symbols of the ruling party were used in promotional videos, as well as images of leaders and activists. For example, the promotional video of the URA, which contains a technically modified image of the leader of the ruling party, was not allowed to be broadcast on the Public Service RTCG, while it was available on Facebook.

Also, it is important to notice that most of the political entities were active on Facebook during electoral silence day, which stared on Friday, August 28, 00:00 (midnight), and lasted till Saturday, August 29, 00:00 (midnight). Precisely, DCG published new political promotional video on August 29, 2020 at 14:00, both on Facebook and YouTube channel, while DF and Prava CG broadcasted a live political debate on Facebook platform on the same day at 20:00. Most political parties were running paid ads on social networks, on the August 29, 2020, as many as 130, mostly on Facebook (116) and Instagram (110) platforms. Online paid ads were visible to the voters on many other websites and portals during the electoral silence period.

2.1.1. **Paid ads**

When it comes to paid ads on social media, in the period from March – August 2020, political parties had a total of 3,154 paid ads on social networks, most of which were on Facebook (2,679) and Instagram (2,133).For the purposes of this section of the Report, we collected data about paid ads that were available in Ad Library section of each political party's official Facebook page during monitoring activities. The number of paid ads run before the Ad Library was enforced in Montenegro (from March-July 2020) may differ slightly from numbers in Facebook's Ads Manager as obligation to provide exact data about paid ads run by political parties in Montenegro started from August 5, 2020.

The trend of increasing paid content on social networks during the election campaign is evident, thus in the period from March – June there were 497 paid ads, which number increased sharply in the following period, i.e. from June – August, counting 2,657 new paid ads. In the observed period, the number of paid ads by months was as follows: March (85), April (186), May (226), June (328), July (331), August (1998).

In the observed period, DCG (788) had the highest number of paid ads, followed by SD (692), URA (646), SDP (303), DPS (273), DF (160). Minority parties had the least paid ads that were active mainly in August (HRS-48, HGI-46, BS-11).

When it comes to the audience, while analyzing paid ad details using Ad Library feature, the most content paid by political parties is shown to men aged 25-34, as well as 35-44 and 45-54. Also, there is a certain number of paid ads whose target group is exclusively the younger population, namely men aged 18-24 and 25-34. Political paid ads that were shared only on Instagram were mostly shown to younger populations. There were also paid ads presented to the female population, however to a lesser extent than those directed towards the opposite sex, suggesting that the role of the Montenegrin women in decision making and politics is still underestimated.

In relation to territorial coverage, the highest number of paid ads is shown to residents of the Capital Podgorica, the municipalities of Niksic, Budva, Bijelo

Polje, Tivat, Ulcinj, Bar, and to a lesser extent in other municipalities.

Bearing in mind that there is no legislative framework in Montenegro which explicitly regulates online media and social networks, it is important to mention the obligation to adhere to Facebook rules on political advertising for all political entities in Montenegro, which came into force on 5 August 2020. Therefore, the authors of political advertisements are obliged to identify themselves, which is aimed at increasing the transparency of political campaigns and responsibil-ity of political entities on social networks before the forthcoming parliamentary elections in Montenegro. With regards to that, the data on authorized advertis-er or the author of the advertisement were provided by Montenegrin political parties and will be available in Ad Library for the next 7 years. However, Facebook Advertising Policies were not completely adhered to by Montenegrin political parties. Certain number of paid ads were removed by Facebook failure to adhere to the prescribed rules.

Image 9: Removed political ads. Facebook accounts „ Demokratski front" and „Aleksa Becic - Demokrate - Demokratska Crna Gora"
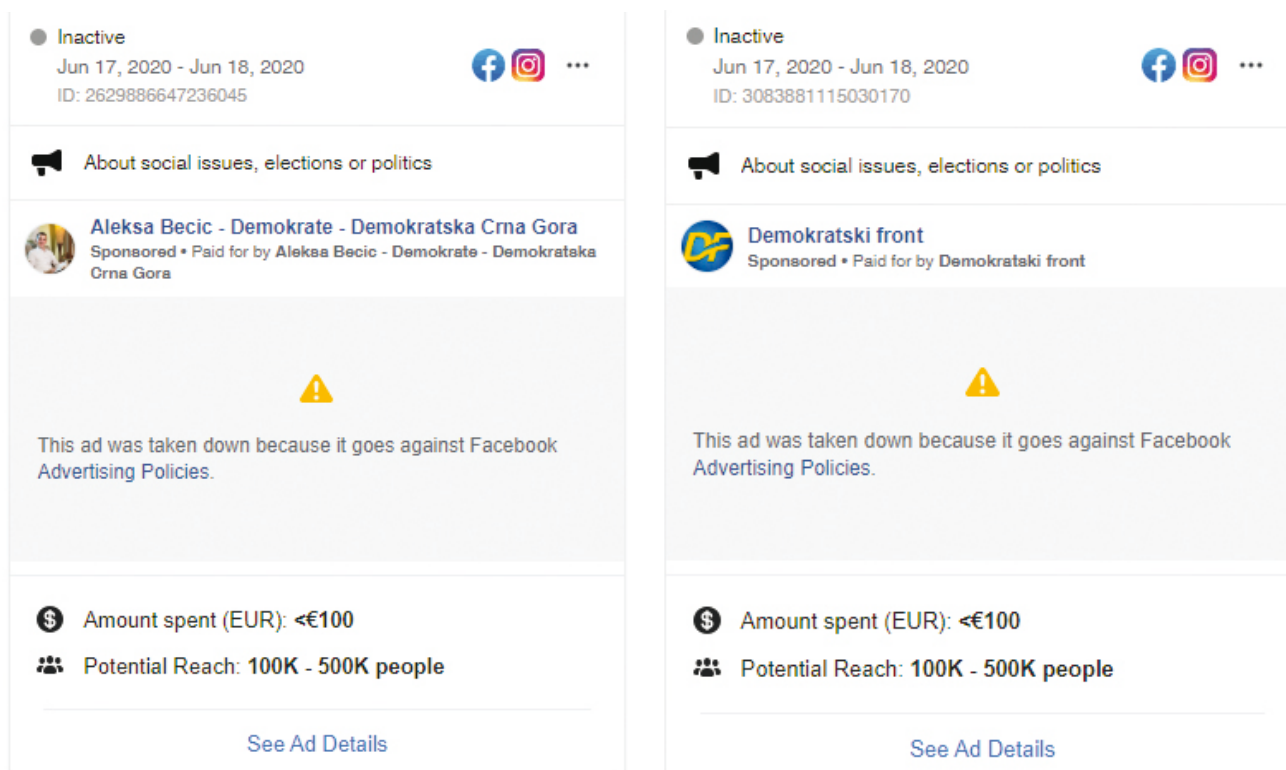
While there are no specific national rules about online political campaigning in Montenegro, there are general rules that apply - ones developed and enforced by Facebook. However, relying on a private company to both make and enforce rules around online political campaigning implies long process and, except the severe abuse, no clue if any action will be taken in order to prevent further online violations. Here it is important to mention paid political ads that were banned to broadcast on national TV stations but were available on Facebook, which is not only the case in Montenegro but also in other countries during election period.

We have already argued that Facebook weakened its rules considering the content moderation, thus the Facebook Adveritising Policies are necessary, but again not sufficient. Through this Report, we showed that online political advertising and campaigning in Montenegro had far more reach and scope than traditional ways of campaigning. Therefore, law makers should consider regulating online campaigning as crucial aspect not only for the improvement of the integrity of the electoral process, but also for the protection of right of voters to receive information and make free choice.

2.2. Findings: Abuse of State Resources and role of state institutions

In this section we present e-evidence of behavior that could present a potential abuse of state resources. Namely, for tracking potential abuses using CrowdTangle, we primarily monitored the official accounts of the Government and ministers[36], public companies[37], political parties, politicians, and media outlets.[38] We set up referral and viral alerts for 10 clusters of key words: Infrastructure, Write-off of debts, Opening, Works, Reconstruction, Assembly, Social Benefits, Use, Employment, and Giro account.

Throughout the alerts we received every post containing one of the key words listed above from all the monitored entities.

We identified a total of 238 posts. From March – August, the number of identified posts was as follows: March (2), April (11), May (28), June (55), July (49), August (93). For the purpose of research, we also included data from September 2020 which counts 22 posts.

Chart 2: Number of posts related to investments during electoral period

Source: Author prepared chart based on data available on CrowdTangle.

36 Vlada Crne Gore, Ministarstvo odbrane Crne Gore, Ministarstvo prosvjete Crne Gore, Ministarstvo zdravlja Crne Gore, Ministarstvo unutrašnjih poslova Crne Gore, Ministarstvo kulture Crne Gore, Ministarstvo poljoprivrede i ruralnog razvoja, Ministarstvo sporta i mladih, Ministarstvo nauke Crne Gore, Ministarstvo rada i socijalnog staranja, Ministarstvo javne uprave Crne Gore, Poreska uprava Crne Gore, ME4EU, klinicki_centar_cg, Ministarstvo za ljudska i manjinska prava Crne Gore, Agencija za sprječavanje korupcije, Odbor za evropske integracije Skupštine Crne Gore, Ministarstvo finansija, Uprava Za Dijasporu Crne Gore
37 Montenegro Airlines, Univerzitet Crne Gore, Aerodromi Crne Gore, Nacionalni parkovi Crne Gore / National parks of Montenegro, 13. jul Plantaže, Institut "Dr Simo Milošević" Igalo, Željeznički prevoz Crne Gore AD Podgorica, Luka Bar A.D., JP Morsko dobro
38 RTCG Portal, Sputnik Србија, CDM Portal, Vijesti , Portal Analitika, Informativni portal IN4S, Portal Antena M, FOS Media, Kolektiv. me, kodex.me, Pcnen, Radio Slobodna Evropa , Borba.me, Radio Jadran, Portal Standard, Aktuelno, Boka News, Radio - televizija Herceg Novi, Dnevne novine Dan, NOVA M, MINA, Dnevne Novine, Monitor - Crna Gora, Magazin Sedmica, Crnogorske novosti

Given that entities monitored in this section are supposed to be non-partisan accounts in most cases, besides political parties and politicians, the fact that their posts increased so dramatically to coincide with the electoral period suggests post timing is linked with the political cycle.

During the electoral period it is of crucial importance to manage official state accounts with highest level of professionalism and political neutrality. The transparency and accountability in managing official state's accounts and websites during elections could raise public trust in electoral process. During the implementation of social media monitoring activities, we noticed usage of certain words in the official post that might have connotation to certain political party's slogan. The post was shared among Government and ministers official accounts.

Image 10: Use of state accounts. Facebook accounts „Vlada Crne Gore ", „Ministarstvo poljoprivrede i ruralnog razvoja", and „Milutin Simovic".

Other than state accounts, profiles of state employees could be misused for the purposes of political propaganda. As presented in the Analytical Paper[39] that was prepared within this Project, the views of state officials expressed through social media are considered public communication, thus the principles of the Code of Ethics must be applied to the conduct of the latter on social media. The Code of Ethics prescribes that state employee must not behave in a manner that has a negative impact on the reputation of the state body.

The following evidence suggests the potential behavior that could impact the reputation of the state body, in terms of public distrust in the professional and political neutral work of the institution as its official website link was used during political propaganda. Namely, the candidate for MP on his official Facebook profile, linked the official ministry's website to the promotional political video.

Image 11: Use of personal accounts. Facebook account „Damir Šehović "

Presented evidence may be problematic from the point of view of the provisions of the Code of Ethics of public servants and employees[40]. The Code prescribes that "out of work time an officer must not behave in a manner that has a negative impact on the reputation of the state body" (Article 5). Additionally, when presenting the views of the state body and personal views, the public official is obliged to preserve the reputation of the state bodies and personal reputation (Art. 8). This in particular with regards to the trust of citizens in the work of state body, which in this case could be negatively affected.

Furthermore, social media is a good tool for surfacing evidence of offline instances of ASR such as the use of state cars or offices during the electoral period. The nature of the violation of abusing political position makes it difficult to prove as officeholders, particularly senior officials, have many powers, privileges and resources, and considerable discretion in terms of how they apply them. Senior officials are often required by law or regulation to travel only with official transportation and security, and their high profile often brings considerable public attention, including from the media.

During the 2020 Parliamentary Elections there was a situation when the President of the Parliament used the state car during the electoral period. However, national law provides that the restriction of using public cars during the electoral period do not apply for protected persons. As the President of the Parliament of Montenegro is a protected personality, according to the law, CeMI does not consider this to be abuse of state resources. It is important to mention here that this is not a good practice, even if it is not abuse of state resources according to the domestic law. But it represents abuse in substantial sense, thus it is necessary to reconsider legal provisions concerning protected persons.

Throughout the monitoring of social media activities, we have found another case of the use of state car, identified through media outlet. Namely, e-evidence suggesting a potential abuse of state resources regarding the car of the president of the municipality parked in front of the hotel in another municipality during non-work day. As reported in the media, he did not provide the reasons for using the car.

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39 *Reshaping the electoral run through the usage of social media in Montenegro,* Analytical Paper, CeMI-IFES, 2020
40 The Code of Ethics (Official Gazette of Montenegro, no. 050/18)

Image 12: Use of state car. Facebook account „FOS Media "

When it comes to the usage of social media for the collection of the evidence of the offline ASR, this Pilot effort had a limited approach. However, the room for the further development exists. Through its election monitoring activities, CeMI has developed „Fair Elections" app with various options, among which the irregularities reporting feature, which is a step forward in collection of evidence about electoral irregularities using new technologies. Following the examples of other countries, innovative approaches on how social media could be used for the monitoring of the offline aspects of ASR in the future could bring significant contribution to the anti-corruptions efforts in Montenegro.

Conclusions

Through our research and monitoring efforts in the past six months, we examined and documented online behavior during 2020 Parliamentary Elections in Montenegro. This Report presents our findings on political behavior during the election campaign period with the aim to inform and educate citizens, i.e., voters, how online activities can impact the elections.

The documented cases represent an important advancement when it comes to the tracking of the ASR during elections. Unlike traditional political conversations, online conversations and activities leave traces. The properties of these traces make it possible, for the first time, to formally analyze online behaviors and provide the voters with the evidence indicating their impact on the electoral process.

It is important to note that the increase in negative phenomena such as inauthentic and manipulative behaviors and abuses, particularly during the periods of intensified political and social engagement, i.e., elections, is a global trend. Indeed, international research showed the rise of popularity of right-wing political ideologies as they are more successful in engaging their Facebook followers than their competitors.[41] They often use sensational rhetoric and hate-mon-

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41 Larsson O. A., *Right-wingers on the rise online – insights from the 2018 Swedish Elections,* Kristiania University College, School of Communication, Leadership and Marketing, 2019

gering as campaign techniques, utilizing social media to largely undisputedly articulate their ideology and spread their messages.[42]

In relation to the Coordinated Inauthentic Behavior analyzed in this Report, there is strong evidence that coordination among entities of the network identified on social media during Montenegrin 2020 Parliamentary Elections existed. The coordination was visible through many accounts posting similar or identical content across multiple Pages, Groups and Meme accounts in the network promoting specific political narratives in the lead-up to 2020 Montenegrin Elections. Most of the entities were created or changed their names in a short period of time. Data evidencing the political background suggests the involvement of individuals, groups, and media outlets outside of Montenegro as well.

Based on the data we collected and presented we can conclude that the use of technology, especially social media for political purposes, is trending in Montenegro. There is an evident increase in the use of various tools available on the Internet to reach as many citizens, i.e. voters, as possible. One of the popular tools is the one we presented here - creation and usage of various Pages, Groups and Meme account on social networks (dedicated to entertainment, culture or community) that, without revealing their authentic goals, share content through which they promote a certain political narrative.

All of this can have a negative consequence on the electoral process, as political entities in that way influence the political opinion of citizens, and thus jeopardize voters' right to free and informed choice. It also leaves the space for online manipulations such as creating the illusion of massive support or the popularity of certain subjects in order to bring in genuine support, the spread of disinformation/fake news/misinformation. Additionally, technologies make it possible for international actors to interfere with national electoral processes.

This Report further addressed the potential abuses of state resources, i.e., misuse of official state accounts, profiles of state employees, as well as the use of state cars during the electoral period. Collected data shows that state institutions were not active as much as political parties on social media during electoral period. What raised the most concern is the increased number of investments during the electoral period (e.g., opening of the schools, buildings, infrastructure reconstructions, road works, creation of green areas in urban zones, public lightning, etc.), which instrument was used both by the incumbent as well as opposition parties.

This data shows that Montenegrin political parties are still finding the ways to violate anti-corruption standards, on local and national level. The consequence could result in the campaign violations and abuses of state resources that are not sanctioned, which would have a negative impact on the overall integrity of the electoral process, as well as on the trust of the citizens in fair and free elections.

The cases analyzed in this Report are a consequence of the lack of legal framework and coordinated institutional response mechanisms to prevent and combat abusive behavior online and offline during the electoral period. Against this backdrop, it is increasingly important for policymakers, electoral authorities, and other national stakeholders to collaboratively capitalize on opportunities and tackle challenges presented by the use of social media during elections.

With this in mind, domestic anti-corruption strategies and tactics could play a crucial role in preventing deceptive political behavior on social media and abuse of state resources, as political actors worldwide are increasingly adopting new methods to manufacture and artificially amplify social media content.

CSOs and media play an important role as well, not only in terms of educating citizens and conducting awareness-raising campaigns about digital rights and online threats, but also in strengthening their own capacities in using new technologies and combating deceptive campaigns, such as disinformation, fake news, misinformation, etc. Bearing this in mind, in the last chapter we present our Recommendations, which reflect a set of activities that should be taken in the future based on the work done in the past several months.

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42 *Idem*

Recommendations

1. FOR POLICYMAKERS (PARLIAMENT, GOVERNMENT)

- The Code of Ethics of state employees should be amended to address the use of private social media accounts for political purposes.
- The Law on Financing of the Political Entities and Electoral Campaigns should be amended to address the use of social media during campaigning.
- The Law on Election of MPs and Councilors should be amended to address the behaviors and use of social media during electoral silence day.

- State institutions should adopt multi-stakeholder - collaborative approach (with private sector and CSOs) and establish legal and institutional mechanisms for protection of users on the Internet.
- The Communication Plan of the Government of Montenegro, in particular the crisis communication, should be updated to address spread of disinformation, misinformation, and hate speech during sensitive times, e.g., COVID-19 and elections.

2. FOR THE AGENCY FOR PREVENTION OF CORRUPTION (APC)

- APC should adopt new tactics for the monitoring of abuses of state resources adapted to the online environment.
- APC should work on capacity building for the collection of evidence of abuse of state resources using new technologies.

- APC should improve collaboration efforts with other actors (institutions, CSOs and media) while monitoring of potential abuses of state resources.
- APC should work on advancement of locally owned anti-corruption action plans.

3. FOR CIVIL SOCIETY ORGANIZATIONS, MEDIA, AND DONOR COMMUNITY

- CSOs should conduct awareness-raising campaigns about digital rights and ways to protect human rights online.
- CSOs should improve their capacities by adapting and using more digital tools in their everyday work.
- CSOs should increase their monitoring functions to bring attention to the ASR, disinformation, hate speech, and discrimination with the aim to enhance transparency, accountability, and inclusion.

- CSOs should inform and educate society on tolerance and social cohesion, and counter hate speech messaging targeting marginalized groups (women, ethnic minorities, LGBTIQ population, etc.).
- Media should be provided with the support in education about disinformation campaigns, in particular during elections.
- Media should establish an intersectoral cooperation with the CSOs for combating online disinformation campaigns.

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