



2025 Municipal Elections in Georgia

Assessment of the Pre-Election Environment



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I. Key Findings and Conclusions

The next municipal elections in Georgia are scheduled for October 4, 2025. Citizens registered across 64 municipalities will have the right to elect both representative bodies (Sakrebulos – city/municipal councils) and executive bodies (mayors) of local self-government units. The official pre-election period commenced on August 5, 2025.

With this report, ISFED assessed the current environment at the outset of the pre-election period and the extent to which the necessary conditions for holding democratic elections are in place. The assessment also takes into account the European Union's requirement for Georgia, as a candidate country, to ensure free, fair, and competitive elections. In ISFED's view, the three conditions outlined in the Venice Commission's Code of Good Practice in Electoral Matters—respect for fundamental rights, stability of electoral law, and the existence of procedural guarantees—have largely not been met, significantly undermining the prospects for free, fair, and competitive elections.

Political Context

- Georgia is heading into municipal elections against a backdrop of political crisis, democratic backsliding, and a deteriorating human rights situation. The results of the 2024 parliamentary elections were widely criticized for failing to meet several election standards, prompting an opposition boycott and resulting in a de facto one-party parliament. In this context, the ruling Georgian Dream party has adopted repressive legislative amendments, intensified pressure on civil society and the media, and pursued the political persecution of opposition leaders. At the same time, protests have been suppressed through violent methods and restrictions on civil rights. Collectively, these developments have severely undermined the fundamental rights essential for upholding democratic principles.
- Georgia risks international isolation as it continues to deviate from democratic standards. The United States, the European Union, and several European states have imposed sanctions on leaders of the Georgian Dream party and representatives of law enforcement agencies. Recently adopted legislation, including the Foreign Agents Registration Act (FARA) and new restrictions on grants, has become a powerful tool for suppressing civil society and independent media. In this context, the upcoming municipal elections risk being neither competitive nor legitimate, but instead held under the shadow of a deep political crisis and the potential non-recognition of results.

Legislative Framework

• The country is approaching municipal elections following significant legislative amendments enacted after the 2024 parliamentary elections. These changes were introduced rapidly by the *Georgian Dream* party in a one-party process, without broad consultation. The amendments have substantially undermined key aspects of the electoral system, strengthened mechanisms for banning political parties, and restricted the operations of election observation organizations. Collectively, these measures compromise the fairness of the electoral process and further erode public trust in electoral institutions.

Electoral System

- Less than a year before the municipal elections, the *Georgian Dream* implemented fundamental
 changes to the electoral system for local representative bodies, which took the form of a
 manipulation. In the prevailing political context, these amendments were designed to create
 advantages for the *Georgian Dream*, fundamentally violating a core condition for upholding the
 principles of democratic elections as outlined in the Venice Commission's Code of Good Practice
 in Electoral Matters.
- In line with the interests of the *Georgian Dream*, the 40% threshold in the majoritarian component of the Sakrebulo elections was abolished; the proportion of majoritarian seats in municipal representative bodies was sharply increased; and the size of multi-member districts was reduced. The legal electoral threshold was raised in the proportional component, and the electoral formula was altered to favor the party with the best result. The creation of new single-member districts in the election year further violated international standards, undermining the principle of equal voting power—an essential element for upholding the fundamental right to equal suffrage.

Election Administration

- After the 2024 parliamentary elections, the ability to compose election commissions in a balanced manner was significantly weakened, while de facto control of these commissions by the *Georgian Dream* was further consolidated. According to the official election results, five parties gained parliamentary seats and, consequently, the right to appoint members to election commissions; however, only two the *Georgian Dream* and the party *Strong Georgia Lelo, for People, for Freedom!* exercised this right. As a result, the Central Election Commission currently comprises 10 members, a composition that substantially undermines the balance between party-appointed members and professionally elected members, which was intended when the 17-member commission was established. Moreover, the fact that professionally elected members of the election administration remain under the ruling party's influence continues to pose a challenge, further eroding public trust in the electoral body.
- As in the previous parliamentary elections, electronic technologies will be widely used in the municipal elections. In response to the systemic issue of compromised voter secrecy in 2024—such as visible marker traces—additional technical adjustments were introduced in 2025; however, their effectiveness remains questionable. Furthermore, public trust in electronic voting technologies continues to be low, and insufficient measures have been taken to address this challenge since the last parliamentary elections.

Political Parties

• The Georgian Dream has intensified its criminal prosecution of the opposition, leading to the imprisonment of the leaders of three parties that passed the threshold in the recent parliamentary elections. At the same time, an investigation is ongoing against the chairman of the fourth party. Simultaneously, the Georgian Dream has continued its anti-democratic rhetoric advocating the banning of opposition parties and has enacted legislative amendments to this effect, further heightening the risk of deepening authoritarianism in the country.

- Seventeen political parties have applied to the Central Election Commission for registration in the municipal elections, of which 14 have been approved. Meanwhile, several major opposition parties, including the Unity - National Movement and the Coalition for Change, have boycotted the elections in response to the ongoing persecution and arrests of civil activists and opposition leaders.
- Following the political developments after the 2024 parliamentary elections, the financial situation of opposition political parties has further worsened, sharply increasing disparities in party resources. The four main opposition parties lost the state funding they had received due to the results of the parliamentary elections, leaving 80% of state funding in the hands of the *Georgian Dream*. This inequality is further reinforced by the fact that 84% of private donations went exclusively to the *Georgian Dream* between January and July of this year.

Media Environment

- In recent years, media freedom in Georgia has sharply declined, with violence against journalists becoming increasingly frequent. Following the 2024 elections, the *Georgian Dream* party adopted several legislative amendments that further restrict media operations and empower the Communications Commission with censorship tools. The revised Law on Freedom of Speech and Expression shifted the burden of proof in defamation cases onto defendants and weakened protections for source anonymity. Media coverage of court proceedings has also been significantly curtailed. Meanwhile, lawsuits and fines against independent journalists have taken on a punitive character. The criminal prosecution of journalist Mzia Amaglobeli exemplifies a deliberate, repressive policy targeting the media.
- Media pluralism in the country has further deteriorated ahead of the municipal elections. TV stations critical of the *Georgian Dream* face financial and legal pressures; Mtavari TV was shut down this year, and several regional outlets are confronting existential challenges. Government influence over the public broadcaster has grown. At the same time, the *Georgian Dream*'s media ecosystem—including anonymous pages and accounts—actively spreads anti-Western propaganda on social media and conducts discrediting campaigns, often echoing Russian narratives.

Election Observation

• The ability to conduct objective, non-partisan international and domestic election observation was severely curtailed. Breaking with two decades of precedent, the government did not invite an OSCE/ODIHR international observation mission. Simultaneously, the Central Election Commission restricted observers' rights, and the Georgian Dream party intensified pressure on domestic observer organizations. Stigmatizing laws targeting civil society and restrictions on foreign grants further impeded the work of these organizations. As a result, the election observation mechanism—intended to ensure transparency—became a target of government control and pressure, which significantly limited the procedural guarantees necessary for democratic elections.

II. Introduction

In line with the Constitution of Georgia, the next municipal elections are scheduled to take place on October 4, 2025. Georgian citizens registered in 64 municipalities (5 self-governing cities and 59 self-governing communities) have the right to elect both representative bodies (Sakrebulos – city/municipal councils) and executive bodies (mayors) of local self-government units. According to Georgian legislation, the election date was announced on August 5, sixty days before election day, thus commencing the official pre-election period in Georgia.¹

With this report, the International Society for Fair Elections and Democracy (hereinafter ISFED) assesses the current environment at the outset of the pre-election period, encompassing the political context, the state of democracy and human rights, the electoral legislative framework and its amendments, election administration, political parties, the media environment, election observation, and other pertinent issues.

The issues presented in the report play a defining role in implementing the principles of democratic elections (universal, equal, free, secret, and direct suffrage) as established by international instruments, Europe's electoral heritage, and the Constitution of Georgia. Regardless of how these principles will be followed on election day itself, in accordance with the Venice Commission's Code of Good Practice in Electoral Matters, their implementation requires the observance of three conditions, which include respect for fundamental rights, stability of electoral law, and the existence of procedural guarantees. The principles of democratic elections cannot be followed without protecting the freedoms of expression, the press, movement, political assembly, and association. In addition, fundamental elements of electoral law, namely the electoral system, the composition of election commissions, and the establishment of district boundaries, should not be subject to change less than one year before the elections (even if this is not done with the intention of manipulation, such changes are considered dictated by private political interests). For procedural guarantees to be ensured, it is essential that elections are administered by a transparent, impartial, and manipulation-free election administration, that both national and international observers have the broadest possible opportunities to monitor the process, and that an effective appeals system is in place.²

An important reference point for this report is the set of steps established by the European Union for Georgia as a candidate country for EU membership, among which the holding of free, fair, and competitive elections is a key prerequisite.³

¹ "Decree of the President of Georgia on the Scheduling of Municipal Elections," Election Administration of Georgia, Accessed on August 15, 2025, https://bit.ly/3HDLm0c

² "Code of Good Practice in Electoral Matters: Guidelines, Explanatory Report and Interpretative Declarations," Venice Commission, Council of Europe, Strasbourg, pp. 32-46, Accessed July 22, 2025, https://www.venice.coe.int/images/SITE%20IMAGES/Publications/Code conduite PREMS%20026115%20GBR.pdf

³ "Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee of the Regions: 2023 Communication on EU Enlargement Policy," European Commission, pp. 25-26, Accessed July 22, 2025, https://bit.ly/3zg1NLO

III. Political Context

Georgia is approaching municipal elections in a challenging political context, stemming from the sharp deterioration of the environment after the previous general election. The parliamentary elections of October 26, 2024, and the subsequent developments marked a turning point in Georgia's political system, laying the foundation for a political crisis that encompassed the crisis of governmental legitimacy, a sharp democratic decline, and a significant deterioration in the human rights situation. These factors pose serious risks to the legitimacy of the upcoming elections and the recognition of their results.

According to Freedom House, in 2025, Georgia lost its electoral democracy status for the first time since 2012, placing it among the political regimes where the electoral process fails to meet minimum democratic standards.⁴

The official results of the 2024 Parliamentary Elections - according to which, the *Georgian Dream - Democratic Georgia* (hereinafter - Georgian Dream) party received 53.93% of the valid votes of the voters participating in the elections⁵- failed to gain the trust of the general public, which, among other things, was due to a number of serious violations recorded by international and domestic observe organizations both in the pre-election period and voting processes. According to the assessment of the International Election Observation Mission of the OSCE Office for Democratic Institutions and Human Rights (hereinafter – OSCE/ODIHR), reports of pressure on voters, particularly on public sector employees, during the pre-election period, together with extensive tracking of voters on election day, raised concerns about the ability of some voters to cast their vote without fear of retribution. Election day was also characterised by frequent violations of the secrecy of the vote, reports of widespread voter intimidation and pressure, and a number of other significant shortcomings.⁶

After the Central Election Commission of Georgia (hereinafter the CEC) announced the results of the 2024 Parliamentary Elections, the main opposition political parties declared the results illegitimate and demanded a re-run of the elections. Although President Salome Zurabishvili appealed the election results to the Constitutional Court, the Georgian Dream majority recognized the new parliament's authority before the Court's decision, contravening parliamentary regulations.⁷

All opposition parties that, according to the results announced by the CEC, passed the 5% threshold required to enter parliament, refused to participate in parliamentary activities. Additionally, the political parties – the Coalition for Change Gvaramia Melia Girchi Droa (hereinafter the Coalition for Change), the Unity - National Movement (hereinafter the UNM), and the Strong Georgia - Lelo, for People, for Freedom! (hereinafter the Lelo) requested from the parliament to terminate their mandates and canceled the party lists registered with the CEC. On February 5, 2025, the mandates of 49 members of parliament from the three parties were terminated, reducing the official composition of the parliament from 150 to 101 listed

⁴ "Freedom in the World 2025, Georgia," Freedom House, Accessed on August 15, 2025, https://freedomhouse.org/country/georgia/freedom-world/2025

⁵ "Voting results," Election Administration of Georgia, Accessed on August 15, 2025, https://results.cec.gov.ge/#/ka-ge/election-57/tr/dashboard

⁶ "Georgia: Parliamentary Elections 26 October 2024, ODIHR Election Observation Mission Final Report," Office for Democratic Institutions and Human Rights, Accessed on August 15, 2025, https://www.osce.org/files/f/documents/1/6/584029 0.pdf

⁷ "Recognition of the mandates of new members of parliament by the Parliament of Georgia is unconstitutional," ISFED, Accessed July 22, 2025. https://bit.ly/41NwKIH

members.⁸ The *Gakharia for Georgia* party, which also joined the opposition boycott, did not submit an official request to terminate its mandates. However, on July 2, 2025, the Georgian Dream parliament terminated the mandates of this party's 12 MPs on the grounds of unexcused absences from parliamentary sessions.⁹ Considering that the mandates of their replacements have not been recognized yet, only 89 members elected from the *Georgian Dream* list are officially registered in the parliament at the moment.

At the end of 2024, the Georgian Dream-controlled parliament, acting in violation of legally prescribed deadlines and amid an opposition boycott, elected a new President of Georgia. The quotas allocated to opposition parties from local self-government representative bodies in the electoral college were filled by the *Georgian Dream*. The opposition parties assessed the presidential election process as illegitimate and refused to participate. This process was also recognized as illegitimate by the incumbent president, Salome Zurabishvili, who stated she would be the legitimate president until new parliamentary and presidential elections were held. In circumstances where the head of state of Georgia was to be elected indirectly for the first time in history - a process requiring the high legitimacy of the electoral college - the one-party conduct of the election by *Georgian Dream* undermined the constitutional role of the presidential institute and called its legitimacy into question for a significant part of society.

On November 28, 2024, the announcement by the Georgian Dream parliament-appointed Prime Minister, Irakli Kobakhidze, to suspend Georgia's EU accession talks¹⁰ triggered another wave of large-scale protests in the country, which were repeatedly dispersed through the use of excessive force. Documented cases revealed violence and the systematic torture of hundreds of demonstrators through the use of physical force and/or unidentified chemical irritants, resulting in long-term health consequences. According to detainees, who sustained multiple injuries, law enforcement officers subjected them to violence both during and after their arrest.¹¹

According to the assessment of the Public Defender of Georgia, the alleged ill-treatment, including torture and inhuman and degrading treatment, against the participants of the protests was systemic and in some cases large-scale. Out of 442 individuals the Public Defender's Office visited from November 2, 2024, to March 1, 2025, 267 individuals (60%) indicated ill-treatment. In addition, in the first days of the dispersal of the protests, from November 29, 2024, to December 2, 79.5% of the visited individuals were subjected to ill-treatment, and - 88% from those visited on February 2-3, 2025. According to the legal aid network of the civil society organizations, from November 19, 2024, to February 28, 2025, administrative proceedings were initiated against 1,084 individuals, and 486 individuals were administratively detained.

⁸ "49 opposition MPs have their parliamentary mandate terminated", Radio Liberty, *February 5, 2025,* https://www.radiotavisupleba.ge/a/33304016.html

⁹ 'The MPs of the "Gakharia for Georgia" Party Have Their Parliamentary Mandates Terminated", Interpressnews, *July 2, 2025,* https://bit.ly/46WOO0j

¹⁰ "Georgian Dream" does not want to open negotiations with the EU until the end of 2028," Radio Liberty, *November 28, 2024,* https://www.radiotavisupleba.ge/a/33219304.html

¹¹ 'Detained citizens are subjected to inhumane and degrading treatment!', Georgian Young Lawyers' Association. Accessed August 16, 2025. https://gyla.ge/post/dakavebulebi-sastikad-nacemia

¹² 'The Situation of Human Rights and Freedoms in Georgia', 2024, Report of the Public Defender of Georgia, pp. 77-78. Accessed on August 16, 2025. https://ombudsman.ge/res/docs/2025040121291438156.pdf

At the same time, since the April-May 2024 protests, more than 60 individuals were arrested under criminal law, whose rights to a fair trial have been restricted.¹³

In November and December 2024, the Special Investigation Service (hereafter the SIS) launched an investigation into cases of abuse of power involving violence against protest participants and unlawful interference in the professional activities of journalists; however, no individual has been held accountable. According to the SIS statement of January 17, 343 individuals, including 49 journalists, had been questioned since the investigation's outset. Medical, biological, and tracing examinations of the clothing of those injured during the protest were scheduled, and some individuals were granted a victim status. ¹⁴ Despite the measures taken at the onset, the investigation was not conducted effectively. At the same time, in May of this year, 9 MPs initiated a draft law in parliament to liquidate the SIS. ¹⁵ Following the adoption of the legislative amendment, which took effect on July 1, the SIS was abolished, and its functions and criminal cases were transferred to the Prosecutor's Office of Georgia. ¹⁶

Despite the mass persecution and harassment of activists, protest rallies continue across the country, with the primary demand being to hold new parliamentary elections and to release the detained participants of the protest. Since December 2024, in an effort to suppress the ongoing protests, the *Georgian Dream* party has forcefully adopted restrictive and repressive laws characteristic of an autocratic regime, while fully subordinating the legislative process to narrow party interests. The changes were implemented in several waves, including amendments to the Law on Assemblies and Manifestations, the Code of Administrative Offenses, and the Law on Freedom of Speech and Expression. These changes have become a tool for the authorities to punish participants in assemblies and demonstrations and intimidate citizens, creating a risk of introducing censorship over political opinions. In violation of European standards, citizens - including journalists - were fined for alleged insult or defamatory statements against government officials on social media. This practice poses a significant challenge to the free conduct of the election campaign.¹⁷

The *Georgian Dream* systematically used the legislative amendments to artificially restrict protests, resulting in the application of administrative sanctions, including fines and detention, against demonstrators. During the hearings of these administrative offense cases, participants were given only limited opportunities to exercise their procedural rights fully. Media coverage of the trials served as an essential source of public information. In response, however, the *Georgian Dream* introduced further amendments to the Law on Common Courts¹⁸, prohibiting photo and video recording and broadcasting in court premises, including courtyards, and granting exclusive access to such materials to the court and its

¹³ "The Crisis of Human Rigths Ensuing the 2024 Parliamentary Elections in Georgia," Young Georgian Lawyers' Associatin, Accessed on August 22, 2025 http://bit.ly/44J7zTw

¹⁴ Special Investigation Service, Facebook post, January 17, 2025, https://bit.ly/3UAYQwJ

¹⁵ "Draft Law: On Amendments to the Organic Law of Georgia "On the Prosecutor's Office"," Parliament of Georgia, Accessed August 19, 2025. https://bit.ly/45AmazK

¹⁶ "Special Investigation Service Joins the Prosecutor's Office," *Radio Liberty,* May 19, 2025. https://www.radiotavisupleba.ge/a/33418134.html

¹⁷ See the annex for a brief description of these legal ammendments.

¹⁸ Organic Law of Georgia On Common Courts – Amendment to the Organic Law of Georgia, Parliament of Georgia, No. 921-IIIრb-XIô3, July 2, 2025, Accessed July 23, 2025, https://matsne.gov.ge/ka/document/view/6557897?publication=0

authorized persons. The media and journalists will be given the opportunity to videotape the session only if the High Council of Justice decides so.¹⁹

In addition, Georgian Dream continued to restrict the work of civil society organizations, a process that began even before the 2024 parliamentary elections with the adoption of the Law on Transparency of Foreign Influence, which was widely criticized by authoritative observers.²⁰ On April 1, 2025, the Georgian Dream parliament adopted the Foreign Agents Registration Act,²¹ the enactment of which further heightened the risk of persecution of Georgian civil society organizations. In addition, organizations and individuals began facing a real and immediate threat of dissolution and persecution under criminal law.²² Additionally, in April 2025, the *Georgian Dream* expedited an amendment to the Law on Grants, which effectively prohibited donors from issuing foreign grants without prior government consent, thereby restricting civil society.²³

Media freedom in the country is facing significant challenges. Several legislative amendments have been adopted to restrict media organizations and journalistic activity, including changes to the Law on Broadcasting,²⁴ which effectively prohibited broadcasters from receiving foreign funding and imposed such media standards that risked gross interference with, and censorship of, their editorial policies.²⁵

With the parliament functioning as a de facto one-party body, the *Georgian Dream* leveraged its power against the opposition. On February 5, 2025, based on the initiative of the *Georgian Dream*, the "Temporary Investigative Commission of the Parliament of Georgia to Investigate the Activities of the Regime and Political Officials of the Regime in 2003-2012"²⁶ (although its name and mandate were later changed) was established. The Commission was established in violation of the Rules of Procedure of the Parliament of Georgia, as opposition representatives were not included in the required number. Representatives of all opposition political parties that had crossed the electoral threshold were summoned before the Commission; however, the majority refused to appear, which subsequently served as grounds for initiating criminal prosecutions against opposition leaders. To obtain a legal assessment of the reasons for non-compliance with its request, the Commission submitted information on the following opposition party leaders and other politicians to the Prosecutor's Office of Georgia: Nika Melia, Nika Gvaramia, Zurab Girchi Japaridze, Giorgi Vashadze, Mamuka Khazaradze, Badri Japaridze, Irakli

¹⁹ "Amendments to the Organic Law of Georgia on Common Courts Completely Eliminate the Accountability of the Judicial System to the Society," International Society for Fair Elections and Democracy. Accessed July 22, 2025. https://bit.ly/3HjMFl0

²⁰ Law of Georgia "On Transparency of Foreign Influence", Parliament of Georgia, 4194-XIVθb-Xθ3, 08/05/2024. Accessed on August 16, 2025. https://matsne.gov.ge/ka/document/view/6171895?publication=0

²¹ Law of Georgia "Foreign Agents Registration Act", Parliament of Georgia, 399-II∂b-XI∂3, 01/04/2025. Accessed on August 16, 2025, https://matsne.gov.ge/document/view/6461578?publication=0

²² Some organizations have already taken certain steps to suspend their activities.

²³ Law of Georgia "On Amendments to the Law of Georgia "On Grants", Parliament of Georgia, 496-II8b-XI83, 16/04/2025. Accessed on July 23, 2025. https://matsne.gov.ge/ka/document/view/6475816?publication=0

²⁴ Law of Georgia on Amendments to the Law of Georgia "On Broadcasting", Parliament of Georgia, 407-II∂b-XI∂3, 01/04/2025. Accessed on July 23, 2025. https://matsne.gov.ge/ka/document/view/6461980?publication=0#DOCUMENT:1;

²⁵ "Amendments Initiated to the Law on Broadcasting Undermine Media and Freedom of Expression", Social Justice Center. Accessed July 23, 2025. https://bit.ly/47xFJLw

²⁶ Resolution "On the Establishment of a Temporary Investigative Commission of the Parliament of Georgia to Investigate the Activities of the Regime and Political Officials of the Regime in 2003-2012", Parliament of Georgia, 240-IIθb-XIθδ. Accessed July 23, 2025. https://info.parliament.ge/file/1/BillReviewContent/378453?

Okruashvili, and Giorgi (Givi) Targamadze.²⁷ All eight of them are currently in custody. They were sentenced to 7 to 8 months in prison and banned from holding public office for 2 years.²⁸

In parallel with the persecution of opposition leaders, Georgian Dream maintained anti-democratic rhetoric against opposition parties and repeatedly announced its intention to appeal to the Constitutional Court to ban major opposition parties, introducing legislative amendments to this end.²⁹

At the end of December 2024, a large-scale wave of dismissals of civil servants began across public institutions. These decisions primarily targeted civil servants who had publicly expressed their civic position on the country's European integration process after November 28. The dismissals affected thousands of employees in both state and local self-government bodies.³⁰

The dismissal of employees from public institutions has been further simplified by the amendments to the Law on Public Service, which were adopted by the *Georgian Dream* in an expedited manner on December 13, 2024. The aforementioned amendments have worsened the legislative framework, which essentially contradicts the spirit of the Constitution of Georgia, the Law on Public Service, and worsens the rights of public servants. The illegal dismissal of qualified and experienced public servants and the strengthening of political influence in the public service will significantly harm the effective functioning of public institutions.³¹

For years, the Georgian Dream has been intensifying its hostile rhetoric against the EU, the US, and democratic European states, which have already imposed sanctions or are considering imposing them on individuals involved in Georgia's democratic backsliding and human rights abuses. The US Treasury Department imposed sanctions on the founder and honorary chairman of the *Georgian Dream*, Bidzina Ivanishvili, as early as the end of 2024. During the same period, the European Union restricted visa-free travel for holders of Georgian diplomatic and service passports. Along with the US and the EU, the United Kingdom of Great Britain and Northern Ireland, Germany, Poland, the Czech Republic, Lithuania, Latvia, Estonia, and Ukraine have also imposed sanctions on Georgian Dream leaders, law enforcement officials, judges, and other individuals.³² On July 14, 2025, the European Commission's Directorate-General for Migration and Home Affairs recommended that Georgia repeal controversial laws and ensure the

²⁷"Third Interim Report on the Activities of the Temporary Investigative Commission of the Parliament of Georgia Investigating the Activities of the Regime in Power in 2003–2012, Political Officials of that Regime, and Current and Former Officials Associated with Political Parties from 2003 to the Present," Parliament of Georgia. Accessed July 23, 2025. https://info.parliament.ge/file/1/BillReviewContent/393430?

²⁸ "Who are the 5 judges who sentenced 8 politicians to prison?", Radio Liberty, July 10, 2025. https://bit.ly/45439FD

²⁹ "Georgian Dream" to petition Constitutional Court to ban opposition parties after local elections", Civil Georgia, April 15, 2025. https://civil.ge/ka/archives/675991

³⁰ In the following institutions: Parliament of Georgia, Tbilisi City Hall, LEPL National Agency of Public Registry, Administration of the Government of Georgia, Personal Data Protection Service, Tbilisi City Hall Public Relations Agency, National Agency for Criminal Prevention, Execution of Non-custodial Sentences and Probation, Ministry of Internal Affairs, Services Development Agency, CEC, State Inspectorate Service, High Council of Justice of Georgia, Tbilisi City Hall City Health and Social Services City Service, LEPL Youth Agency, as well as other central and local budgetary institutions.

³¹ 'Amendments to the Law of Georgia "On Public Service" Made by the Illegitimate Parliament Sharply Worsen the Rights of Civil Servants', International Society for Fair Elections and Democracy. Accessed on August 16, 2025. https://bit.ly/4mlxcA3

³² Sanctioned Representatives of "Georgian Dream", Transparency International – Georgia. Accessed on August 18, 2025. https://bit.ly/4|QUwEV

protection of citizens' rights in order to maintain visa-free travel.³³ However, this call was followed by the continued spread of anti-EU messages, including conspiracy theories by the *Georgian Dream*.

The recent policies pursued by the *Georgian Dream* have undermined the essential preconditions for holding democratic elections in the country. In addition, against the backdrop of the opposition's declaration of the parliament's illegitimacy and in the run-up to the municipal elections, the *Georgian Dream* introduced a series of changes to the electoral system serving its own interests, in violation of international standards. In the current context, only a part of the main political parties are considering participating in the October 4 municipal elections, which significantly reduces the possibility of competitiveness of the elections.

IV. Legislative Framework

Georgia's electoral framework, a complex legal system, is governed by several key legislative acts. In particular, the Constitution of Georgia,³⁴ the Election Code of Georgia,³⁵ the Organic Law on Political Associations of Citizens³⁶, and legal acts adopted by the CEC (decrees, resolutions, etc.).³⁷ In addition, some essential issues for elections are regulated by the Rules of Procedure of the Parliament of Georgia,³⁸ the Code of Administrative Offenses,³⁹ the Criminal Code,⁴⁰ the Law on Broadcasting,⁴¹ and other acts.

Georgia approaches the municipal elections of October 4, 2025, amid significant legislative changes. Since the October 26, 2024, Parliamentary Elections, multiple waves of amendments to the electoral legislation have been implemented, substantially shaping the electoral environment and ongoing processes. For example, eight packages of amendments to the Election Code were initiated and adopted during this period. These amendments have been frequently adopted through expedited procedures and approved solely by the Georgian Dream parliamentary majority, serving its narrow party interests. The absence of

³³ "The European Union demands that Georgia repeal controversial laws and ensure the protection of citizens' rights – letter", Radio Liberty, July 16, 2025. https://www.radiotavisupleba.ge/a/33475780.html

³⁴ Constitutional Law of the Republic of Georgia "Constitution of Georgia", Parliament of the Republic of Georgia, 786, 24/08/1995. Accessed on July 14, 2025.

https://matsne.gov.ge/document/view/30346?publication=36

³⁵ Organic Law of Georgia "Election Code of Georgia", Parliament of Georgia, 5636-რს, 27/12/2011. Accessed on July 14, 2025. https://matsne.gov.ge/document/view/1557168?publication=99

³⁶ Organic Law of Georgia "On Political Associations of Citizens", Parliament of Georgia, 1028, 31/10/1997. Accessed on July 14, 2025. https://matsne.gov.ge/ka/document/view/28324?publication=50

³⁷ For more infromation see <u>www.cesko.ge</u>

³⁸ "Rules of Procedure of the Parliament of Georgia", Parliament of Georgia, 536-II0b-XI03, 13/05/2025. Accessed on July 14, 2025. https://matsne.gov.ge/document/view/6494611?publication=3

³⁹ Law of Georgia "Code of Administrative Offenses of Georgia", Presidium of the Supreme Council of the Georgian SSR, 161, 15/12/1984. Accessed on July 14, 2025. https://matsne.gov.ge/document/view/28216?publication=593

⁴⁰ Law of Georgia "Criminal Code of Georgia", Parliament of Georgia, 2287, 22/07/1999. Accessed on July 14, 2025. https://matsne.gov.ge/document/view/16426?publication=282

⁴¹ Law of Georgia "On Broadcasting", Parliament of Georgia, 780, 23/12/2004. Accessed 14 July 2025. https://matsne.gov.ge/document/view/32866?publication=82

prior consultations or inclusive stakeholder participation further eroded public trust in the electoral process and state institutions.

Among the important legislative changes, the first to be noted is the significant changes made to the existing electoral system for the elections of the representative body of the municipality - the Sakrebulos, as a result of which the share of the majoritarian component in the current mixed-member system has significantly increased. The electoral threshold for the Sakrebulo elections has also been increased, namely from 2.5% to 4% in Tbilisi, and from 3% to 4% in other municipalities.

In addition, amendments were introduced concerning the banning of political parties. Specifically, a new ground was added, allowing the Constitutional Court of Georgia to ban a party whose declared purpose or activities essentially replicate those of a party previously forbidden by the Court, the Election Code prohibited the head of an observer organization or an observer from engaging in election campaigning, the liability for violating election legislation was increased, and the fine for interference in the functions and activities of an election commission was set at 2,000 GEL instead of 500 GEL. The most significant legislative changes are discussed thematically in separate chapters of the report.

V. Electoral System

The electoral system is one of the fundamental dimensions of elections, which is vital to represent an agreed rule among the main actors. According to the Venice Commission's Code of Good Practice in Electoral Matters, it is unacceptable to change the electoral system frequently or within a year before elections. Such changes are considered to be dictated by private political interests, even if they are not made with the intention of manipulation. Therefore, in line with the Venice Commission's recommendation, when elections are scheduled within the coming year, any changes to the electoral law should take effect only after those elections, ensuring that the upcoming vote is conducted under the existing system.⁴²

In all 64 municipalities of the country, Sakrebulo members and mayors are directly elected for a four-year term. Georgian citizens registered in self-governing units elect the mayor based on a two-round majoritarian electoral system, and the Sakrebulos based on a mixed electoral system. Defying international standards, the *Georgian Dream* party has modified the electoral system for municipal representative body elections over the past year to advance its own interests. This process was preceded by the abolition of the 40% threshold for candidates in the majoritarian component of the municipal elections. This was abolished before last year's parliamentary elections, on May 15, 2024.⁴³ Under the

⁴² The Parliamentary Assembly of the Council of Europe, the European Commission for Democracy through Law (Venice Commission), "Code of Election Norms: Guidelines and Explanatory Report", was adopted at the 52nd Session of the Venice Commission (Venice, October 18-19, 2002).

⁴³ Organic Law of Georgia on the Amendment of the Election Code of Georgia in the Organic Law of Georgia, 4171-XIV∂b-X∂3, 15/05/2024, https://matsne.gov.ge/ka/document/view/6164944?publication=0

revised system, the candidate who receives the highest number of valid votes in a given local single-member district will be elected as a member of the Sakrebulo through the majoritarian component.

On December 13, 2024, the 2021 model for electing Sakrebulos was abolished, and the number of Sakrebulo members - as well as the distribution between majoritarian and proportional seats - was reverted to the 2017 system. ⁴⁴ Prior to these amendments, 80% of the seats in the representative bodies of self-governing cities were allocated through the proportional electoral system and 20% through the majoritarian system. In the Sakrebulos of self-governing communities, two-thirds (67%) of the seats were allocated through the proportional component, while one-third (33%) were filled through the majoritarian tier. With the amendment introduced by the *Georgian Dream* in December, the number of proportional and majoritarian seats in the Tbilisi City Sakrebulo was made equal, while the share of majoritarian seats in other self-governing cities increased to 40%. Moreover, the size of the Sakrebulo in four self-governing cities was reduced from 35 to 25 members, heightening the risk of a significantly disproportionate translation of votes into mandates, particularly in favor of the leading party.

According to the new version of the Election Code, the Sakrebulo of a self-governing community consists of 15 members elected through the proportional component, plus one member from each settlement (village, town, or city) within the territory under the majoritarian component. In administrative centers of self-governing communities with more than 4,000 voters, no fewer than two and no more than five single-member districts are established. In January 2025, the CEC defined all local single-member districts and their boundaries for the upcoming municipal elections. ⁴⁵ According to this decision, in the Sakrebulos of 59 self-governing communities, majoritarian seats account for an average of 52%, while proportional seats comprise only 48%. In some municipalities, however, the share of majoritarian mandates is particularly high - for example, in Zugdidi, Ozurgeti, Tsalka, Gori, Gurjaani, Akhalkalaki, and Chokhatauri, where 60–70% of Sakrebulo seats are allocated through the majoritarian component. Such a dominant share of majoritarian mandates significantly distorts the balance between votes and seats, enabling candidates with relatively low voter support to secure an absolute majority in the Sakrebulo.

Notably, the creation of new single-member districts for municipal elections has resulted in all municipalities violating the principle of equal distribution of seats and votes across districts. Realizing this right is essential for the fundamental principle of equal suffrage.⁴⁶

Furthermore, the December 2024 amendment raised the legal electoral threshold in the proportional component of all Sakrebulo elections, creating an additional factor that may further increase disproportionality. Under the old version of the Election Code, political parties participating in municipal elections were required to overcome a 2.5% threshold in Tbilisi and 3% in other municipalities. Following the December amendments, this threshold for winning mandates in the proportional component has been raised to 4% in both Tbilisi and other municipalities.

⁴⁴ Organic Law of Georgia "On Amendments to the Organic Law of Georgia "Election Code of Georgia", 168-lθb-Xlθ3, 13/12/2024, https://matsne.gov.ge/ka/document/view/6328589?publication=0

⁴⁵ 2025 Municipal Elections - Electoral Districts and Precincts: District, Central Election Commission of Georgia. Accessed on July 31, 2025. https://cesko.ge/ge/archevnebi/2025

⁴⁶ Parliamentary Assembly of the Council of Europe, European Commission for Democracy through Law (Venice Commission), "Code of Electoral Standards: Guidelines and Explanatory Report", adopted at the 52nd session of the Venice Commission (Venice, 18-19 October 2002).

The Election Code of Georgia establishes the following formula for allocating mandates among political parties that cross the electoral threshold: the number of votes received by a party list is multiplied by the total number of proportional seats in the multi-member electoral district and then divided by the sum of votes received by all parties that surpassed the threshold. The integer part of the calculated result determines the number of mandates allocated to each party list. If the total number of seats distributed among parties in an electoral district is less than the number of proportional mandates available, the remaining seats are allocated first to party lists with higher results that crossed the electoral threshold but did not receive a mandate in the initial distribution.⁴⁷

When applying the above formula to allocate mandates to party lists, in many cases, some seats remain undistributed. On March 4, 2025, Georgian Dream amended the distribution rule, a change driven entirely by its own political interests.⁴⁸ This amendment created additional advantages for the potentially leading political party in the elections and further deteriorated the electoral system compared to the one in place in 2017. Specifically, under the March 4, 2025, amendment, once all parties that crossed the threshold have received at least one mandate, any remaining undistributed seats are sequentially allocated to the political parties with the highest vote totals. Prior to the latest amendment, undistributed mandates were allocated to parties with the largest remainder votes after the initial distribution, ensuring a more proportional and equitable conversion of votes into seats. Under the revised electoral formula, however, Georgian Dream - the likely leading party - secured an additional mandate in Sakrebulos, amounting to 4% of proportional seats in the Tbilisi City Sakrebulo and 6.7% in other municipalities. A detailed analysis of the revised electoral system is provided in a separate <u>publication</u>.

VI. Election Administration

1. Composition and Activities of the Election Administration

In Georgia, election administration operates through a three-tier system of election commissions. Alongside the CEC, the administration includes 73 district and 3,051 precinct commissions.⁴⁹ Under the Election Code, each commission at all three levels may consist of up to 17 members: a maximum of 9 appointed by political parties that gained parliamentary representation in the previous elections, and 8 elected on professional grounds through a competition.⁵⁰

⁴⁷ Organic Law of Georgia "Election Code of Georgia", Parliament of Georgia, 5636-რს, 27/12/2011, Article 148. Establishing the results of elections conducted through the proportional electoral system. Accessed on July 14, 2025. https://matsne.gov.ge/document/view/1557168?publication=99

 ⁴⁸ Organic Law of Georgia "On Amendments to the Organic Law of Georgia "Election Code of Georgia", Parliament of Georgia,
 332-IIθb-XIθ3, 04/03/2025. Accessed on August 16, 2025, https://matsne.gov.ge/ka/document/view/6435783?publication=0
 49 'The selection process for heads and members of precinct election commissions has been formally announced', Central Election Commission of Georgia. Accessed August 18, 2025. https://bit.ly/470SL4b

⁵⁰ CEC members appointed under professional quotas are elected by Parliament, whereas members of district and precinct election commissions are elected by higher-level election commissions.

According to the official results of the 2024 Parliamentary Elections, five parties won parliamentary mandates and thereby acquired the right to appoint members to election commissions. However, only two parties - the *Georgian Dream* and *Lelo* - exercised this right. As a result, the CEC currently consists of 10 members, undermining the intended balance between party-appointed and professionally elected members originally envisaged in the design of the 17-member election commission.

In recent years, the rules for composing the election administration have increasingly been shaped to serve the ruling party's interests. As a result, members formally elected on professional grounds have, in practice, advanced the ruling party's agenda, further eroding public trust in the election administration. This trend was evident during the 2024 Parliamentary Elections. The most recent changes to the CEC's composition occurred in February 2025, when the Georgian Dream parliament re-elected four CEC members.⁵¹

Once the elections were scheduled, the election administration began implementing the measures prescribed by electoral legislation. A competition was announced to staff the district first⁵² and then the precinct election commissions.⁵³ In this regard, as in other elections, the extremely tight deadlines and procedures for the competition set by law remain a problem, which, among other factors, significantly reduces the possibility of holding a real competition among those applying for vacant positions.

On December 16, 2024, by order of the CEC Chairperson,⁵⁴ the reorganization of the CEC was initiated. While the official justification for the reorganization was to ensure systemic and effective governance, some dismissed employees stated that their removal was linked to their public support for European integration. The following day, on December 17, the CEC adopted a decree⁵⁵ that defined the staff structure, remuneration levels, and budget allocations for the CEC leadership, members, and staff. Under the new staff list, the number of positions was reduced from 118 to 103.

In addition, some dismissed employees linked the reorganization to the personal revenge of the CEC Chairperson, referring to an incident on November 16, 2024, when Davit Kirtadze, a CEC member appointed by the *United National Movement*, threw black paint at the Chairperson. ⁵⁶ Notably, Kirtadze's wife, Sophio Sichinava, served as head of the CEC's Strategic Planning and Reporting Department. She resigned shortly after the incident, citing personal reasons. This department was abolished after the reorganization, and all of its employees were dismissed. The reorganization also resulted in the dismissal of four members of the Training Monitoring Group, one member of the Labor Safety Group within the

⁵¹ 'Georgian Dream's Parliament Elected CEC Members', Civil Georgia, February 19, 2025. https://civil.ge/ka/archives/664202

⁵² For additional information, see the Central Election Commission website. Accessed on August 16, 2025. https://bit.ly/45DIrOh

⁵³ For additional information, see the Central Election Commission website. Accessed on August 16, 2025. https://bit.ly/4fHpmyc
⁵⁴ Order "On the Commencement of the Reorganization of the Apparatus of the Central Election Commission of Georgia". Central

⁵⁴ Order "On the Commencement of the Reorganization of the Apparatus of the Central Election Commission of Georgia", Central Election Commission of Georgia, No. 01-148. Accessed July 22, 2025. https://drive.google.com/file/d/1QdTz8DZePO_0dPoYJQ7SxAjRJxorkSh0/view

⁵⁵ Decree "On Determining the Staffing List, Amount of Remuneration and Expense Estimate of the Heads, Members and Employees of the Central Election Commission of Georgia and the CEC Staff", Central Election Commission of Georgia, No. 359/2024, accessed July 22, 2025, https://bit.ly/45AYEma

⁵⁶ 'An incident at the CEC session - Davit Kirtadze called Giorgi Kalandarishvili a "black spot" and threw black paint at him', Interpressnews, November 16, 2024. https://bit.ly/45FNvAC

Human Resources Management and Labor Safety Department, as well as two advisors to the Chairperson.⁵⁷

2. Election Technologies

Similar to the 2024 parliamentary elections, a large share of polling stations will conduct voter registration, ballot casting, vote counting, and the compilation of summary protocols electronically. According to the Election Code of Georgia, the CEC determines by decree the list of election districts and precincts where electronic voting will be conducted. This list must be defined so that the selected districts and precincts encompass at least 70% of all registered voters in the country. For the upcoming elections, the CEC announced that a total of 3,051 precincts will be opened nationwide, of which 2,284 will operate with electronic technologies and 767 will not use them. The key electronic technologies to be used are: (a) voter verification devices and (b) electronic voting machines.

The main problem with the use of electronic technologies in the 2024 Parliamentary Elections was that the marker traces were visible on the back of ballots, which compromised the secrecy of the vote. 60 Although the election administration denied the existence of this problem, on April 29, 2025, the CEC adopted a decree introducing additional measures. 61 Under this decree, a cardboard cover secured with adhesive tape will be attached to the slot of the electronic voting machines, and the design of the ballot frame envelope will also be modified. However, it remains uncertain whether these adjustments will be sufficient to fully safeguard the secrecy of the vote.

During the large-scale introduction of electronic technologies in the 2024 Parliamentary Elections, the non-transparent conduct of the process significantly undermined trust in these technologies. Political parties and monitoring organizations were excluded from both the software development and the audit process.⁶² How transparent these procedures will be in the upcoming municipal elections remains unclear.

⁵⁷ 'ISFED Will Represent the Interests of Those Fired from the CEC,' International Society for Fair Elections and Democracy. Accessed July 22, 2025. https://isfed.ge/geo/gantskhadebebi/samartliani-archevnebi-tsesko-dan-gatavisuflebul-pirta-interesebs-daitsavs

⁵⁸ Organic Law of Georgia, "Election Code of Georgia", Parliament of Georgia, 5636-რს, 27/12/2011, Article 76³. Electoral Districts/Precincts. Accessed August 15, 2025. https://matsne.gov.ge/document/view/1557168?publication=99

⁵⁹ 'CEC Reminds Election Parties of Accreditation/Registration Deadlines for October 4 Elections,' Central Election Commission of Georgia. Accessed August 19, 2025. https://cesko.ge/ge/siakhleebi/pres-relizebi/singleview/11036734-tsesko-archevnebshi-chartul-mkhareebs-4-oktombris-archevnebistvis-akreditatsiaregistratsiis-vadebs-sheakhsenebs

⁶⁰ 'Final Report on Monitoring the 2024 Parliamentary Elections of Georgia', International Society for Fair Elections and Democracy, p. 6. Accessed August 15, 2025. https://isfed.ge/geo/2024-saparlamento/saqartvelos-parlamentis-2024-tslis-archevnebis-monitoringis-saboloo-angarishi

⁶¹ Decree on establishing the form of the ballot paper and special frame-envelopes, the main ballot box, and the type of the special electronic vote counting device installed on it, in order to ensure the use of electronic means of voting for the elections of municipal bodies on October 4, 2025. Central Election Commission of Georgia. Accessed on July 22, 2025 https://bit.ly/45Mqigi
62 'Final Report on Monitoring the 2024 Parliamentary Elections of Georgia', International Society for Fair Elections and Democracy, p. 6. Accessed July22, 2025. https://isfed.ge/geo/2024-saparlamento/saqartvelos-parlamentis-2024-tslis-archevnebis-monitoringis-saboloo-angarishi

VII. Political Parties

1. The State of Political Parties, Registration, and Preparations for the Elections

Under Georgian legislation, any citizen with the right to vote who is at least 25 years old on election day and has resided in Georgia for at least six months may be elected mayor of a self-governing city or community. Candidates for mayor may be nominated either by a registered political party or by a voter initiative group consisting of at least five members.

A Georgian citizen who is at least 21 years old on election day and has resided in Georgia for at least six months may be elected as a member of a Sakrebulo. Participation in Sakrebulo elections through the proportional system is reserved for political parties. However, in single-member districts candidates may be nominated by either a party or a voters' initiative group.

According to the Election Code of Georgia, political parties wishing to register for Sakrebulos and mayors' elections must follow different procedures. The political parties participating in the most recent parliamentary elections were required to apply to the CEC Chairperson no later than 57 days before election day. The political parties that did not participate in the last parliamentary elections and did not have a representative in the Parliament of Georgia had a deadline to apply for registration from January 1 to July 17 this year.⁶³ In line with these deadlines, 17 parties applied to the CEC for registration in the October 4 elections.⁶⁴ Of these, 14 were granted the right to participate,⁶⁵ while three were denied registration.⁶⁶ Registered parties are required to submit their party lists to the chairperson of the relevant District Election Commission, and, in the case of the Tbilisi Sakrebulo, to the CEC Chairperson, no later than September 4. Political parties are no longer required to ensure that at least one-third of candidates on their party lists are women, as the gender quota provision in the Election Code and the Organic Law on Political Associations of Citizens was abolished in spring 2024. This amendment represents a significant setback for women's political representation.⁶⁷

Of the 14 parties registered for the municipal elections, the two largest opposition alliances from the last parliamentary elections are absent. On July 7, 2025, citing the difficult political situation in the country, eight political parties issued a joint statement refusing to register for the elections and calling on their supporters to boycott the vote. Among them were the parties that came second and third in the official results of the 2024 Parliamentary Elections announced by the CEC: *UNM* and the *Coalition for Change*. By

⁶³ Organic Law of Georgia "Election Code of Georgia", Parliament of Georgia, 5636-რს, 27/12/2011, Article 142. Registration of Parties. Accessed on August 15, 2025. https://matsne.gov.ge/document/view/1557168?publication=99

⁶⁴ 'Registration of Parties for the Self-Government Elections Completed', Central Election Commission of Georgia. Accessed on August 16, 2025. https://bit.ly/4oDZAyQ

⁶⁵ 'Registered election subjects for the October 4, 2025 municipal elections, listed in the same order as application submission,' Central Election Commission of Georgia, Accessed on August 16, 2025. https://bit.ly/46Vrjom

⁶⁶ "Elections of the Self-government organ - Sakrebulo and the mayor of the self-governing city/self-governing community on October 4, 2025 - Parties that were refused registration", Central Election Commission of Georgia. Accessed on August 16, 2025. https://bit.ly/3UyIPZm

⁶⁷ 'Final Report on Monitoring the 2024 Parliamentary Elections of Georgia', International Society for Fair Elections and Democracy, p. 6. Accessed July 22, 2025. https://isfed.ge/geo/2024-saparlamento/saqartvelos-parlamentis-2024-tslis-archevnebis-monitoringis-saboloo-angarishi

contrast, the parties that came immediately after them - *Gakharia for Georgia* and *Lelo* - did not join the boycott. Instead, on July 14, 2025, these parties signed a memorandum of cooperation, under which they agreed to jointly consider nominating common candidates for mayoral and Sakrebulo races in single-member districts.⁶⁸

The decision of the eight parties not to participate in the municipal elections was influenced, among other factors, by the criminal prosecution and arrest of several opposition leaders. In the context of a de facto one-party parliament, on February 5, 2025, the Georgian Dream unlawfully established the "Temporary Investigative Commission of the Parliament of Georgia to Investigate the Activities of the Regime and Political Officials of the Regime in 2003–2012."69 The commission's title was later amended to "Temporary Investigative Commission of the Parliament of Georgia to Investigate the Activities of the Regime in 2003-2012, Political Officials of this Regime, and Members of Political Parties Who Were Officials From 2003 to the Present." The timeframe of the commission's mandate was also expanded: instead of focusing solely on 2003–2012, it was extended to cover the period from 2003 to the present. 70 Under the Rules of Procedure of the Parliament of Georgia, at least half of the members of a temporary investigative commission must come from the parliamentary opposition. 71 In the absence of a real opposition in parliament, the Georgian Dream filled the temporary investigative commission with deputies from its own ranks, the political groups of People's Power and European Socialists, to create a pseudo-multi-party composition. In addition, the formal representation of the Georgian Dream accounted for 5 instead of 8 members in the commission, which violated the Rules of Procedure of the Parliament of Georgia.⁷² Representatives of all opposition political parties that had crossed the electoral threshold in the 2024 Parliamentary Elections were also summoned to sessions of the commission. Most of them refused to appear, and this refusal was then used as grounds to initiate criminal proceedings against opposition leaders. In order to legally assess the reasons for the failure to comply with the request of the investigative commission, the investigative commission provided the Prosecutor's Office of Georgia with information⁷³ about the leaders of opposition parties and some other politicians, including Nika Melia, Nika Gvaramia, Zurab Girchi Japaridze, Giorgi Vashadze, Mamuka Khazaradze, Badri Japaridze, Irakli Okruashvili, and

^{68 &#}x27;What did Lelo and Gakharia agree on', Netgazeti, July 14, 2025. https://netgazeti.ge/life/779943/

⁶⁹ Resolution "On the Establishment of a Temporary Investigative Commission of the Parliament of Georgia to Investigate the Activities of the Regime and Political Officials of the Regime in 2003-2012", Parliament of Georgia, 240-II∂l-XI∂3. Accessed on July 23, 2025. https://info.parliament.ge/file/1/BillReviewContent/378453?

⁷⁰ Resolution "On the Establishment of a Temporary Investigative Commission of the Parliament of Georgia to Investigate the Activities of the Regime and Political Officials of the Regime in 2003-2012" on Amendments to Resolution №240-II∂b-XI∂3 of the Parliament of Georgia of 2025", Parliament of Georgia, 413-II∂b-XI∂3. Accessed July 23, 2025, https://info.parliament.ge/file/1/BillReviewContent/384746?

⁷¹ 'Regulations of the Parliament of Georgia', Parliament of Georgia, 536-IIθυ-XIθ3, 13/05/2025, Article 61. Creation of a temporary investigative commission. Accessed on July 14, 2025. https://matsne.gov.ge/document/view/6494611?publication=3

⁷² The commission's work ended on August 4. The six-month work of the commission resulted in a 430-page document, which will be publicly available in early September. The report is based on 46 commission meetings, 139 witness testimonies, and a total of 775 testimonies.

⁷³ "Third Interim Report on the Activities of the Temporary Investigative Commission of the Parliament of Georgia Investigating the Activities of the Regime in Force in 2003–2012, Political Officials of this Regime, and Current and Former Officials Associated with Political Parties from 2003 to the Present," Parliament of Georgia. Accessed July 23, 2025. https://info.parliament.ge/file/1/BillReviewContent/393430?

Giorgi (Givi) Targamadze. All eight are currently in custody, serving prison terms of seven to eight months, and are barred from holding public office for two years.⁷⁴

As a result, of the four main opposition parties that crossed the electoral threshold in the 2024 Parliamentary Elections, the leaders of three parties are now in prison. The persecution of opposition representatives is ongoing. The Prosecutor's Office of Georgia has also launched an investigation against the chairman of the fourth party, *Gakharia for Georgia*. According to the Prosecutor's Office, the inquiry concerns allegations of sabotage, attempted sabotage under aggravating circumstances, collaboration with a foreign organization, and entities under its control, in hostile activities, and mobilization of funds for actions aimed against Georgia's constitutional order and national security. Within this investigation, one of the targets is the decision made by Giorgi Gakharia, then Minister of Internal Affairs, on August 24, 2019, near the occupation line by the village of Chorchana.⁷⁵

Alongside the persecution of opposition leaders, the Georgian Dream continued its anti-democratic rhetoric against opposition parties, repeatedly declaring its intention to appeal to the Constitutional Court to ban the main opposition parties.⁷⁶ Under the Constitution of Georgia, however, a political party may be banned only by a decision of the Constitutional Court, and only if its objectives include overthrowing or violently altering the constitutional order, undermining the country's independence, violating its territorial integrity, engaging in war or violent propaganda, or inciting national, ethnic, sectarian, religious, or social hatred.⁷⁷ The Georgian Dream's stated intention to apply this constitutional definition to all major opposition parties poses a serious risk of consolidating authoritarianism in Georgia. In this context, it is noteworthy that in May of this year, the Georgian Dream adopted a legislative package on party bans, which empowers the Constitutional Court to outlaw a party if its declared objectives, core activities, or personnel composition mirror those of a party already banned by the Court. ⁷⁸ In addition, the legislation set a 14-day deadline for the Constitutional Court to decide.⁷⁹ Notably, after adopting these amendments, the Georgian Dream introduced two further changes to the Organic Law On the Constitutional Court of Georgia at the end of June this year. Under these amendments, the salaries of the chairperson, deputy chairperson, secretary, and all other members of the Court were doubled, and provisions for financial assistance were established in cases where they are subjected to attacks related to their official duties.⁸⁰

⁷⁴ 'Who are the 5 judges who sentenced 8 politicians to prison?', Radio Liberty, July 10. https://bit.ly/45439FD

⁷⁵ 'The action taken by Gakharia at Chorchana is under investigation - the Prosecutor's Office on the summoning of Gomelauri', bm.ge, June 14, 2025. https://bit.ly/41dLqKS

⁷⁶ 'Georgian Dream" to petition Constitutional Court to ban opposition parties after local elections', Civil Georgia, April 15, 2025, https://civil.ge/ka/archives/675991

⁷⁷ Constitutional Law of the Republic of Georgia "Constitution of Georgia", Parliament of the Republic of Georgia, 786, 24/08/1995, Article 23. Freedom of Political Parties, accessed on July 14, 2025, https://matsne.gov.ge/document/view/30346?publication=36

⁷⁸ Organic Law of Georgia "On Amendments to the Organic Law of Georgia "On Political Associations of Citizens", 553-IIθb-XIθ3, 13/05/2025. Accessed on August 16, 2025. https://matsne.gov.ge/ka/document/view/6495448?publication=0

⁷⁹ Organic Law of Georgia "On the Constitutional Court of Georgia" on Amendments to the Organic Law of Georgia, 554-IIθb-XIθ3, 13/05/2025. Accessed on August 16, 2025, https://matsne.gov.ge/ka/document/view/6495304?publication=0

⁸⁰ Under these amendments, the salary of the Chairperson of the Constitutional Court of Georgia will increase from 7,000 GEL to 14,600 GEL in 2025. The salaries of the Deputy Chairperson and Secretary will rise from 6,300 GEL to 13,140 GEL, while those of other members will increase from 6,000 GEL to 12,410 GEL. In addition, members of the Court who become disabled as a result of an attack related to their official duties will receive financial assistance: the equivalent of one year's salary in cases of partial loss of working capacity, and five years' salary in cases of complete loss of working capacity.

These measures have raised concerns that the amendments are intended to influence Court members to issue decisions favorable to the *Georgian Dream* in case of an appeal to the Constitutional Court.

Some political parties have already started actively preparing for the election campaign. Some of them have started presenting election programs and candidates. Among them, the *Georgian Dream* has presented mayoral candidates in Tbilisi and 63 other municipalities.⁸¹

2. Funding of Political Parties

Regarding political finance, the main issues are financial equality among political parties, transparency of finances, and an effective state oversight system. These matters are primarily regulated by the Law on Political Association of Citizens, the Election Code, and the Order of the Head of the Anti-Corruption Bureau on Regulating Issues Related to the Transparency of Political Finances.

2.1. Income of Political Parties

As a result of the political developments following the 2024 Parliamentary Elections, the financial situation of political parties has further deteriorated, while disparities in resources between parties have sharply increased. According to the Venice Commission's Code of Good Practice in Electoral Matters, it is essential that the financing of election campaigns by parties and candidates be governed by the principle of equal opportunity.⁸²

Political parties in Georgia are financed from two primary sources: the State Budget of Georgia and private donations (as well as membership fees). Si Financing parties from a State Budget under fair rules plays a crucial role in ensuring political parties' financial sustainability and the party system's development. Under the current framework, a political party that receives at least 1% of the valid votes in the most recent parliamentary elections is entitled to state funding. A party may refuse this funding by submitting a written application to the CEC within one month of acquiring the right to receive it. Furthermore, pursuant to amendments introduced by the *Georgian Dream* in 2021 to the Law on Political Associations of Citizens, a political party loses state funding if at least half of its elected MPs have their mandates terminated unduly, and it is not possible to recognize replacement mandates sufficient to maintain more than half of the parliamentary seats originally won by that party. A party's state funding is also suspended for six months if more than half of the MPs elected under its name fail, without justification, to attend over half of the regular plenary sessions of parliament during the preceding legislative session. Si

^{81 &#}x27;Georgian Dream nominated mayoral candidates in 63 municipalities', Interpressnews, August 11, 2025, https://bit.ly/4fHi8dj

^{82 &}quot;Code of Good Practice in Electoral Matters: Guidelines, Explanatory Report and Interpretative Declarations," Venice Commission, Council of Europe, Strasbourg, pp. 32-46, Accessed July 22, 2025, https://www.venice.coe.int/images/SITE%20IMAGES/Publications/Code conduite PREMS%20026115%20GBR.pdf

⁸³ 'Challenges for Election Campaign Finance in Georgia', Shota Narsia & Mariam Chubabria. Accessed August 20, 2024, https://bit.ly/4k3fW1T

⁸⁴ Organic Law of Georgia "On Political Associations of Citizens", Parliament of Georgia, 1028, 31/10/1997, Article 30. Accessed on July 14, 2025. https://matsne.gov.ge/ka/document/view/28324?publication=50

As a result of the 2024 Parliamentary Elections, seven political parties became eligible for state funding, though only three currently receive it. Following the elections, the Coalition for Change declined state funding and submitted a formal statement to the CEC refusing it. Subsequently, due to the termination of parliamentary mandates, two other opposition parties – the *UNM* and *Lelo*- also lost their entitlement. In addition, the party *Gakharia for Georgia*, which had also crossed the threshold, had its state funding suspended from July 2025, after the mandates of its elected MPs were abolished due to missing the plenary sessions. As a result, only the *Georgian Dream*, the *Alliance of Patriots of Georgia*, and the *New Political Center (Girchi)* continue to receive funding from the State Budget of Georgia. Of the monthly state allocations, 80% (508.55 GEL) goes to the *Georgian Dream*, whose annual state funding totals 6,100,265 GEL.



Figure 1. Monthly state funding of political parties

Source: Appendix to the Decree No. 2/2025 of the Chairman of the Central Election Commission of Georgia of February 20, 2025

In addition to state funding, the primary source of income for political parties is donations received from Georgian citizens. A citizen of Georgia is entitled to make political donations of no more than 60,000 GEL per year.

Following the 2024 Parliamentary Elections, several regulations on political donations were amended. Previously, political parties were prohibited from accepting donations from legal entities or associations of persons registered in Georgia or abroad, with the exception of receiving free services for lectures, seminars, or other similar public events. This exception has now been abolished, and the ban also applies in such cases. Likewise, the earlier exemption for international organizations and legal entities engaged in nonpartisan institutional development of parties has been removed, meaning the general restrictions of the Law on Political Associations of Citizens now apply to them. In addition, the deadline for submitting information on received donations to the Anti-Corruption Bureau has been extended. Specifically, whereas parties were previously required to submit information on received donations to the Anti-Corruption Bureau within five days, under the new rules, they must now report both donations and

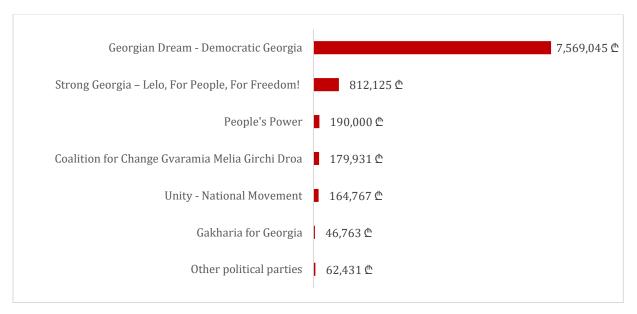
⁸⁵ Organic Law of Georgia "On Amendments to the Organic Law of Georgia "On Political Associations of Citizens", Parliament of Georgia, 495-II8b-XI83, 16/04/2025. Accessed on July 21, 2025. https://matsne.gov.ge/ka/document/view/6475780?publication=0

⁸⁶ Ibid.

membership fee payments on a monthly basis, no later than the 15th day of the month following the reporting period.⁸⁷

During the first seven months of 2025 (January-July), 84% (7,569,045 GEL) of political donations went to the *Georgian Dream* alone, highlighting the significant financial disparity between Georgian political parties. During this period, a total of 12 political parties received donations. Among them, the *People's Power* and the *Georgian Dream* stood out due to the high number of major donors. On average, individual contributors donated around 38,000 GEL to these parties. Furthermore, according to a journalistic investigation, the pattern of donations received by the *Georgian Dream* raises potential signs of corruption.⁸⁸

Figure 2. Political party donations and membership fees for the period January-July 2025



Source: Anti-Corruption Bureau, 2025

Table 1. Average size of donations/membership fees by individuals to political parties during January-July 2025

Political Parties	Average donation/membership fee by individuals (宀)	Number of people
People's Power	38,000	5
Georgian Dream – Democratic Georgia	37,657	201

⁸⁷ Organic Law of Georgia "On Amendments to the Organic Law of Georgia "On Political Associations of Citizens", Parliament of Georgia, 696-IIმს-XIმპ, 24/06/2025. Accessed on July 21, 2025.

https://matsne.gov.ge/ka/document/view/6530779?publication=0#DOCUMENT:1;

⁸⁸ 'Who is gifting money to the "Georgian Dream" - journalistic investigation', TV Pirveli, July 19, 2025, https://tvpirveli.ge/ka/siaxleebi/politika/105930-vin-chuqnis-puls-qartul-otsnebas-jurnalisturi-gamodzieba

Unity – National Movement	10,984	15
Strong Georgia – Lelo, For People, For Freedom!	10,686	76
Ana Dolidze – For People	5,325	2
Solidarity for Peace	4,382	3
Gakharia for Georgia	3,340	14
Coalition for Change Gvaramia Melia Girchi Droa	2,856	63
Conservatives for Georgia	2,440	3
Elene Khoshtaria Droa	1,003	13
Labour Party of Georgia	965	18
European Socialists	900	1

Source: Anti-Corruption Bureau, 2025

2.2. Oversight Activities of the Anti-Corruption Bureau

Since September 2023, the mandate to oversee the financing of political parties has been transferred from the State Audit Office to the newly established Anti-Corruption Bureau. Political parties are now required to periodically submit financial declarations to this agency. In line with Georgian legislation, the Anti-Corruption Bureau must not only publish these declarations but also review them and respond to any shortcomings or violations identified during the monitoring of political finances. While the Bureau is not mandated to conduct criminal investigations - limiting its effectiveness in addressing cases involving potential political corruption - it is empowered to identify administrative violations and take corresponding action.

The main challenge facing the Anti-Corruption Bureau concerns questions about its institutional independence, which emerged immediately after its establishment. The procedure for appointing the head of the Bureau - whereby the Prime Minister directly makes the appointment - significantly undermines the institution's independence from political authorities.

Before the 2024 parliamentary elections, the Anti-Corruption Bureau unlawfully and unjustifiably applied an overly broad interpretation of the standard established by law. As a result, it determined that the activities of two non-governmental organizations and their leaders fell within the scope of a declared electoral goal, and therefore, imposed on them the same restrictions that apply to political parties. Subsequently, following an appeal by the Prime Minister of Georgia, the Bureau revoked its decision.⁸⁹

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⁸⁹ 'Final Report on Monitoring the 2024 Parliamentary Elections of Georgia', International Society for Fair Elections and Democracy, p. 33, accessed August 16, 2025. https://isfed.ge/geo/2024-saparlamento/saqartvelos-parlamentis-2024-tslis-archevnebis-monitoringis-saboloo-angarishi

Moreover, in June 2025, the Anti-Corruption Bureau sent information requests to eight civil society organizations. In its letters, the Bureau once again cited the existence of a declared electoral goal as grounds for its inquiry, even though neither these organizations nor their leaders had ever expressed an intention to participate in elections. According to the Organic Law on Political Associations of Citizens, a declared electoral goal exists only when it is factually evident that a specific person seeks to come to power through participation in elections. Such a statement must be made publicly and aimed at shaping public opinion. The Anti-Corruption Bureau has repeatedly issued statements about civil society organizations revealing clear signs of politicization, bias, and hostility toward them. Therefore, the Anti-Corruption Bureau has, to some extent, turned into a tool for persecuting civil society organizations.

According to the Election Code, candidates and election subjects must submit interim financial reports to the Anti-Corruption Bureau every three weeks, using the form established by the Bureau, starting from the date the election is announced. In addition, no later than one month after the publication of the final election results, they are required to submit a final financial report along with an audit report, covering all funds used from the date of the election announcement until the publication of the final results. Since the elections were announced and the official pre-election campaign began on August 5, 2025, election subjects have not yet submitted their first three-week reports.

At the same time, the Anti-Corruption Bureau is authorized to request additional financial information from political parties for monitoring purposes. In May 2025, the Bureau required political parties to submit financial statements covering the period from January 1 to May 31, 2025. According to the Bureau's official website, 24 political parties submitted the requested declarations.⁹²

The Anti-Corruption Bureau's website includes a register of violations, but it has not been updated since 2023. Moreover, in 2025, the Bureau did not publish a report on its activities related to the supervision of political party finances. As a result, no public information is available in this regard.

VIII. Voter Lists and Registration

According to Georgian legislation, the right to vote in elections is granted to all citizens aged 18 and above with valid electronic ID cards or passports. Exceptions apply to citizens serving a sentence in a penitentiary institution for a grave crime under a court verdict and to those who, by court decision, have been assigned a legal representative and placed in a relevant inpatient medical facility.⁹³

The CEC compiles voter lists based on data from the Public Registry and other records maintained by the State Services Development Agency. The lists are updated several times throughout the year.

⁹⁰ Organic Law of Georgia "On Amendments to the Organic Law of Georgia "On Political Associations of Citizens", 553-IIθυ-XΙθὸ, 13/05/2025, Article 71. Accessed on August 16, 2025. https://matsne.gov.ge/ka/document/view/6495448?publication=0

⁹¹ Anti-Corruption Bureau, Facebook post, 23 July, 2025. https://www.facebook.com/share/p/1Cfhb6eA3c/

⁹² Interim Financial Declarations for 2025, Anti-Corruption Bureau. Accessed August 16, 2025. https://bit.ly/45FkOUi

⁹³ Constitutional Law of the Republic of Georgia 'Constitution of Georgia', Parliament of the Republic of Georgia, 786, 24/08/1995, Article 24. Electoral Right. Accessed on July 14, 2025.

Only voters residing in Georgia are eligible to participate in municipal elections, as no polling stations are established abroad. According to the latest data from the CEC, the unified voter list included 3,476,140 people.⁹⁴

The main obstacles to voter participation and higher turnout in municipal elections include the tense political environment, the ongoing crisis of government legitimacy, widespread public distrust in the electoral process, and the decision of many political parties to boycott the elections.

IX. Media Environment

1. The State of Media and Journalists

In recent years, media freedom in Georgia has sharply deteriorated. In the 2025 Press Freedom Index, Georgia dropped 11 places and now ranks 114th out of 180 countries.⁹⁵ The situation has become particularly alarming since the outbreak of pro-European protests following the 2024 Parliamentary Elections. Between November 28, 2024, and May 2025, 193 media representatives were subjected to repressive actions during protest rallies.⁹⁶ Journalists and cameramen were attacked, verbally and physically abused, obstructed in their work, and had their equipment confiscated or damaged. Several sustained serious injuries that required hospitalization and long-term treatment.⁹⁷ To date, no perpetrators have been identified or held accountable for these attacks. Moreover, media representatives continue to face violence and disruption of their work outside of protest rallies⁹⁸ and even during non-working hours.⁹⁹

Following the 2024 Parliamentary Elections, the *Georgian Dream* party adopted a series of legislative amendments that restrict the activities of independent and critical media outlets. Among the most significant challenges is the Foreign Agents Registration Act, along with an amendment to the Law on Grants¹⁰⁰, which requires prior government approval for the issuance of foreign grants. This measure is particularly problematic for online publications, many of which rely heavily on Western funding. In the context of the ongoing financial crisis, 22 independent online outlets launched a joint fundraising campaign on August 13.¹⁰¹

⁹⁴ See the number of voters on the website of the Central Election Commission of Georgia. Accessed on August 16, 2025. https://bit.ly/3HEJcNQ

⁹⁵ Georgia, Reporters Without Borders, Accessed July 25, 2025, https://rsf.org/en/country/georgia

⁹⁶ "From May 2024 to May 2025, 342 cases of violations of the rights of media representatives were recorded in Georgia", CMIS. Accessed on July 25, 2025. http://bit.ly/405yws2

⁹⁷ The Ministry of Internal Affairs has refused to return equipment confiscated from journalists covering rallies, Mediachecker, December 11, 2024. http://bit.ly/4l1tZ7f

⁹⁸ "TV Pirveli" journalist, who was physically assaulted by Shinjikashvili's father, remains in the clinic today', Mediachecker, May 13, 2025. http://bit.ly/45jNZNJ

⁹⁹ Journalist Zviad Koridze was attacked, Publika, January 15, 2025. http://bit.ly/4kWvflG

¹⁰⁰ Law of Georgia "On Grants", Parliament of Georgia, 331, 28/06/1996, Article 51. Rules for Grant Issuance by a Foreign Grantor (Donor). Accessed on August 16, 2025. https://matsne.gov.ge/document/view/31510?publication=34

¹⁰¹ Publika, 'The light must not go out', August 13, 2025, https://www.facebook.com/publika.ge/videos/1356763255877816

In addition, broadcasters were effectively prohibited from receiving foreign funding. ¹⁰² In early April 2025, amendments to the Law on Broadcasting expanded the regulatory scope over broadcast content, heightening the risk of censorship. Under these changes, if a broadcaster is found to have violated the media standards defined by law - such as requirements of factual accuracy, fairness and impartiality, or respect for privacy - the National Communications Commission, ¹⁰³ acting based on a complaint, is authorized to impose sanctions. The recent amendments have significantly expanded the authority of the Communications Commission, enabling it to address matters previously under the scope of media self-regulation. Under the new provisions, broadcasters are obliged to present a broad spectrum of opinions in author programs and are prohibited from expressing positions for or against political parties or groups in news and socio-political programs. ¹⁰⁴ The law also introduced new rules on secret recording and the broadcasting of such material, which may hinder the work of investigative journalists. ¹⁰⁵ In addition, the term "gender" has been removed from the Law on Broadcasting ¹⁰⁶, thereby releasing the Public Broadcaster from the obligation to reflect gender diversity in its programming. Another amendment further strengthened the regulatory body, granting the Communications Commission the right, through the courts, to request confidential financial information about broadcasters from banks. ¹⁰⁷

The amendments to the Law on Freedom of Speech and Expression, adopted at the end of June 2025, have created serious challenges for media outlets and journalists. Under the new provisions, the burden of proof in defamation cases has shifted from the plaintiff to the defendant, meaning that the defendant must now demonstrate that the disputed statement does not contain false information. In addition, the law abolished the safeguard that previously prevented a court from ruling against a defendant solely on their refusal to disclose a professional secret or reveal a source in cases involving restrictions on freedom of expression. These changes pose a significant threat to the protection of source anonymity and are likely to severely hinder the work of investigative journalists and their ability to cooperate with sources.

In recent months, media outlets have faced increasing restrictions on covering court hearings of public interest. Under the legislative amendments adopted at the end of June 2025, photo and video recording, broadcasting, and audio recording in courtrooms were prohibited. The only exception applies to cases where filming is authorized, with such permission granted by the High Council of Justice on a case-by-case

¹⁰² Law of Georgia "On Broadcasting", Parliament of Georgia, 780, 23/12/2004, Article 66¹. Inadmissibility of financing a broadcaster. Accessed on July 14, 2025, https://matsne.gov.ge/document/view/32866?publication=82

¹⁰³ The communications regulatory body, which regulates TV and radio, as well as telephone and internet services. The chairman of the body, Kakha Bekauri, is sanctioned by the Lithuanian Ministry of Foreign Affairs.

¹⁰⁴ Law of Georgia on Amendments to the Law of Georgia On Broadcasting, Parliament of Georgia, N394-IIθb-XIθ3, 1/04/2025. Accessed on July 25, 2025. https://info.parliament.ge/file/1/BillReviewContent/384875

¹⁰⁵ Law of Georgia On Broadcasting, Parliament of Georgia, 780, 23/12/2004, Article 542. Obtaining and/or transmitting information through covert methods by a broadcaster. Accessed on July 14, 2025. https://matsne.gov.ge/document/view/32866?publication=82

¹⁰⁶ Ibid. Articl 16. Content-related responsibilities

¹⁰⁷ Law of Georgia "On Amendments to the Administrative Procedural Code of Georgia", Parliament of Georgia, N666-II∂lb-XI∂3, 12.06.2025. Accessed on August 16, 2025. https://parliament.ge/legislation/30857

¹⁰⁸ Law of Georgia "On Freedom of Speech and Expression", Parliament of Georgia, 220, 24/06/2004, Article 14. Defamation of a Public Person. Accessed on August 16, 2025. https://matsne.gov.ge/document/view/33208?publication=9
¹⁰⁹ Ibid. Article 7. Standard and burden of proof.

basis.¹¹⁰ These changes create a risk of discriminatory treatment of broadcasters. This concern was confirmed in practice when, for the first time since the amendments entered into force, the High Council of Justice allowed the pro-government TV company Imedi and the Public Broadcaster to film the trial of Giorgi Bachiashvili in a high-profile case, while other media outlets - despite having submitted requests - were denied permission to record the hearings of individuals detained during protest rallies.¹¹¹

Even before the amendment was adopted, media access to courts was restricted: some outlets were barred from attending high-profile hearings, prevented from bringing equipment, expelled from proceedings, or even subjected to physical abuse. Journalists also face difficulties working in parliament. ¹¹² Under the so-called 'yellow security level,' online media representatives are periodically denied entry, while access for broadcasters is only partially permitted. ¹¹³

A significant challenge is also posed by the complaints filed by the *Georgian Dream* party against media outlets, based on which the Communications Commission has already recognized the TV companies Pirveli, Formula, and Mtavari Arkhi as violators of the principle of impartiality due to the use of various terms ("illegitimate government," "regime," "oligarch's parliament") in violation of the principle of impartiality. Based on a complaint from an individual, the Communications Commission recognized the TV company Obiektivi as a violator of the law in July 2025 for violating the due accuracy of facts. However, the Commission also released the aforementioned broadcaster from administrative liability.¹¹⁴ Another example of targeted litigation against specific broadcasters is the information disseminated in the media on July 29, 2025, according to which the Cartu Bank applied to the court to prohibit the TV Pirveli from referring to the bank as the bank of "Ivanishvili" or of "the oligarch".¹¹⁵

The television media in Georgia is highly polarized. Pro-government outlets such as Imedi, Rustavi 2, and PosTV promote the Georgian Dream's agenda, while TV stations with critical editorial policies like Pirveli and Formula face mounting financial and political pressure. In 2025, Mtavari Arkhi was forced to cease broadcasting and now operates only through social media platforms. Its former management attributes the financial crisis to the political interests of the channel's owner. Following a complaint filed by the director, alleging financial violations by the management and co-founders, the Prosecutor's Office searched Mtavari Arkhi and its contractor sales house on July 10, 2025. Regional media also struggle to

¹¹⁰ Organic Law of Georgia "On Common Courts", Parliament of Georgia, 2257, 04/12/2009, Article 13¹. Coverage of court hearings by mass media. Accessed on August 16, 2025. https://matsne.gov.ge/document/view/90676?publication=57

¹¹¹ Mediachecker, 'Following the new restrictions, Imedi and Channel One were the first ones to be granted permission to film Bachiashvili's trial' https://www.facebook.com/photo?fbid=1424994905983478&set=a.825060699310238

¹¹² "Journalists were banned from entering the Tbilisi City Court with cameras for the third time today," Mediachecker, May 30, 2025, http://bit.ly/3GUTVna

^{&#}x27;Only two groups from each broadcaster will be allowed into Parliament for Papuashvili's speech', Mediachecker, May 14, 2025, http://bit.ly/3GEpAJu

National Communications Commission, ComCom found "Obiektivi" in violation of the law for violating due accuracy, July 17, 2025, https://comcom.ge/ge/yvela-siaxle/comcom-ma-obieqtivi-djerovani-sizustis-dargvevistvis-samartaldamrgvevad-cno.page
 Mediachecker, Coalition: The aforementioned case is another clear example of the targeted repressive policy pursued by Bidzina Ivanishvili's Georgian Dream against the media, July 29, 2025, https://www.facebook.com/photo?fbid=1424317336051235&set=a.825060699310238

¹¹⁶ "Zaza Okuashvili decided to close the "Mtavari Channel" - Giorgi Gabunia, Mediachecker, December 12, 2024, http://bit.ly/4f9cD7h

¹¹⁷ "Mtavari Channel" statement, Mtavari Channel, July 16, 2025, http://bit.ly/3U0TwlY

survive: in 2025, Borjomi TV ceased broadcasting, while TV 25 terminated its news programs and political talk shows. 118

Amid the polarized media landscape, the Public Broadcaster also demonstrates bias in favor of the *Georgian Dream*. In April, its management dismissed critically-minded employees, including the Moambe host Vasil Ivanov-Chikovani and Realuri Sivrtse (Real Space) host Nino Zautashvili, while imposing disciplinary sanctions on others.¹¹⁹ In addition to shutting down Realuri Sivrtse, the broadcaster also cancelled programs such as This Weekend¹²⁰, prompting the program's hosts to leave the channel.¹²¹

On August 6, 2025, the Batumi City Court sentenced Mzia Amaglobeli, founder and director of Batumelebi and Netgazeti, to two years in prison. The judge reclassified the charges, convicting her under Part 1 of Article 353 of the Criminal Code, which concerns resistance to a police officer with the intent of obstructing public order.¹²² Initially, Amaglobeli had faced charges of assaulting a police officer and a potential 4–7 year sentence for slapping the head of the Batumi Police Department, Irakli Dgebuadze. However, both arrest footage¹²³ and Amaglobeli's testimony indicate that she was subjected to insults, mistreatment, and threats from the officer after her arrest.¹²⁴ In addition to ordering pretrial detention, the court fined Amaglobeli for disobeying a police officer and damaging public space. Her lawyers argue that the arrest was based on a false report.¹²⁵ As a form of protest, Amaglobeli went on a 38-day hunger strike, requiring hospitalization, during which her eyesight deteriorated severely.¹²⁶

Several media representatives covering anti–Georgian Dream and pro-European rallies were administratively detained and physically assaulted. They were later found guilty of disobeying police orders and issued verbal warnings. ¹²⁷ On January 12, Guram Murvanidze, a cameraman for Batumelebi, was sentenced to eight days of administrative detention. ¹²⁸

Media outlets critical of the Georgian Dream and their representatives have increasingly become targets of financial pressure. In recent months, the Revenue Service has selectively seized the accounts of several

https://batumelebi.netgazeti.ge/slideshow/568401/

¹¹⁸ TV 25: News broadcasts and political talk shows suspended from January 1, Mediachecker, January 20, 2025, http://bit.ly/40B59Us

¹¹⁹ Charter of Journalistic Ethics: The decision of the Public Broadcaster to dismiss Vasil Ivanov-Chikovani and Nino Zautashvili is unjust, Charter of Journalistic Ethics of Georgia, April 12, 2025, https://www.gartia.ge/ka/siakhleebi/article/100353

¹²⁰ მედიაჩეკერი • Mediachecker, Channel One will no longer continue broadcasting - "This Weekend", Facebook post, July 25, 2025, https://www.facebook.com/photo?fbid=1420747623074873&set=a.825060699310238

¹²¹ "Lika Evgenidze and Giorgi Sharvashidze left Channel One", Mediachecker, July 29, 2025, https://www.mediachecker.ge/ka/mediagaremo/article/100908-lika-evgenidzem-da-giorgi-sharvashidzem-pirveli-arkhi-datoves
¹²² Mzia Amaglobeli Sentenced to 2 Years, Batumelebi, August 6, 2025, 2025. https://batumelebi.netgazeti.ge/news/582899/

^{123 &#}x27;I will prosecute her with criminal charges,' - a threat made by Irakli Dgebuadze to Mzia Amaglobeli, ბათუმელები • Batumelebi.ge, January 13, 2025, https://www.facebook.com/watch/?v=787612133562804

^{124 &}quot;The trial of Mzia Amaglobeli is underway in Batumi", Batumelebi, April 7, 2025,

¹²⁵ 'We call on the Prosecutor's Office to stop the political persecution of Mzia Amaglobeli,' - Georgian Young Lawyers' Association, February 12, 2025, https://gyla.ge/post/mzia-amaglobelis-sagme

¹²⁶ "Mzia Amaglobeli ended hunger strike", Civil Georgia, February 18, 2025, https://civil.ge/ka/archives/663627

The court issued a verbal warning to the operator of the "Mtavari Channel", who was arrested while carrying out his professional activities, Mediachecker, February 12, 2025, http://bit.ly/3H1lgnC

¹²⁸ 'Dgebuadze ordered police officers to seize the phone and delete the information' - "Batumelebi" cameraman, Mediachecker, January 23, 2025, http://bit.ly/458wa37

independent outlets, including the Batumelebi, TV company Trialeti, and radio holding Hereti. 129 Meanwhile, pro-government TV channels with similar debts were left untouched, underscoring the discriminatory nature of this practice. 130 Journalists also face illegal fines for allegedly blocking roads while covering pro-European rallies, creating an increasingly hostile working environment. Even when evidence of their professional activities is presented, exemptions from such fines are no longer granted. 131 In June, several journalists were fined 3,000–4,000 GEL for Facebook posts deemed insulting to members of the *Georgian Dream*. 132

2. Ongoing information and propaganda campaigns in the online space

In recent years, social media platforms - most notably Facebook and TikTok - have been actively exploited by the *Georgian Dream* for propaganda, manipulation, and the discrediting of opponents. Progovernment media outlets and news agencies, including Imedi, Rustavi 2, PosTV, Kvira Media Holding, Newshub, and Info 9, play a central role in this process by amplifying identical narratives on Facebook to influence public opinion. At the same time, anonymous pages and accounts conduct coordinated information operations, relying on manipulative tactics to shape discourse. These campaigns are further reinforced by significant financial investment, as evidenced by the paid advertisements run on Meta platforms by both established outlets and anonymous accounts.

Media outlets and anonymous pages aligned with the *Georgian Dream* are openly engaged in anti-Western campaigns. Conspiracy theories about a so-called 'Deep State' are being circulated, while Western countries are accused of provoking unrest and interfering in Georgia's domestic politics. Individual embassies and diplomats are targeted with discrediting narratives, and homophobic hate speech is frequently employed to undermine the West. The Georgian Dream–aligned information ecosystem also carries out smear campaigns against individuals and politicians arrested at rallies, as well as against independent media outlets and civil society organizations. Notably, as in 2024, many of the messages disseminated by this ecosystem closely mirror narratives promoted by Russian propaganda networks operating in Georgia.¹³³

¹²⁹ With the support of its readers, Batumelebi has repaid the principal debt. The Revenue Service has stated that it is prepared to release accounts, provided the outstanding fine is paid according to the agreed schedule.

The Revenue Service seized the accounts of "Batumelebi", Media Advocacy Coalition, July 21, 2025, https://mediacoalition.ge/sashemosavlo-samsakhurma-batumelebs-inkaso-daado/

¹³¹ To the Ministry of Internal Affairs and the Courts - 'Say no to the practice of illegally fining journalists for blocking roads,' Charter of Journalistic Ethics of Georgia, June 9, 2025. https://www.qartia.ge/siakhleebi/article/100627

¹³² Eka Mishveladze Fined 4,000 GEL for Facebook Post, Publika, June 13, 2025, https://publika.ge/eka-mishveladzecebook-postis-gamo-4-000-larit-daajarimes/

^{133 &#}x27;Propaganda and Information Operations in Georgia', International Society for Fair Elections and Democracy. Accessed August 15, 2025. https://isfed.ge/geo/sotsialuri-mediis-monitoringi/propaganda-da-sainformatsio-manipulatsiebi-sagartveloshi

X. Election Observation

Under the Georgian legislation, both domestic and international election observation organizations that meet the conditions outlined in the Election Code and are registered with the CEC or the relevant District Election Commission are entitled to observe elections. Accredited representatives of the press and other mass media also have the right to attend election commission sessions during the election period and to be present at polling stations on election day. In addition, electoral subjects may appoint their own representatives to election commissions.

Effective election observation is a vital element of democratic processes, particularly in countries where democratic institutions are still in the process of consolidation. The presence of observers enhances transparency, strengthens public confidence in the electoral process, and helps prevent violations. For this reason, the role of both international and domestic observers is critical in improving the electoral environment and reinforcing the credibility of elections.

A particularly problematic development regarding election observation is the Georgian Dream's decision not to invite the OSCE/ODIHR mission to monitor the municipal elections. On June 18, 2025, Irakli Kobakhidze claimed that "there is generally no such practice that the OSCE/ODIHR would be invited to the self-government elections. According to standard practice, the OSCE/ODIHR mission is invited to parliamentary and national elections." This decision is likely to negatively impact the legitimacy of the upcoming elections and the recognition of their results.

The OSCE/ODIHR has observed local elections in Georgia four times since 2006. Between 1997 and 2024, it also deployed observation missions to 34 local elections in 13 other countries, held separately from national elections. ¹³⁵ In many cases, local elections have additionally been monitored as part of general or concurrent national elections. While the OSCE/ODIHR's primary focus is on parliamentary and presidential contests, local elections remain an important area of interest in European countries where democratic institutions are not fully consolidated.

In response to the *Georgian Dream*'s decision not to invite an observation mission to the upcoming municipal elections, the OSCE/ODIHR emphasized its readiness to organize such a mission, provided an invitation is extended in a timely manner.¹³⁶

Election observation in Georgia faces significant challenges and obstacles. Chief among them is the increasingly hostile attitude of the *Georgian Dream* towards civil society organizations, including the country's largest and most experienced election observation groups. In recent years, the ruling party's actions have been directed at discrediting and weakening these organizations, undermining their role in ensuring electoral transparency and accountability.

Ahead of the 2024 parliamentary elections, the Georgian Dream adopted the Law on Transparency of Foreign Influence, despite mass protests and negative international assessments. The Law requires any organization receiving more than 20% of its funding from foreign sources to register in a special registry as an entity "representing the interests of a foreign country." The Law directly targeted them since

¹³⁴ "Kobakhidze confirms that Georgian Dream does not invite OSCE/ODIHR to observe local elections", Radio Liberty, June 18, 2025, https://www.radiotavisupleba.ge/a/33447244.html

¹³⁵ "Elections," OSCE Office for Democratic Institutions and Human Rights, Accessed July 23, 2025. https://www.osce.org/odihr/elections

¹³⁶ "OSCE human rights office voices deep concern over increased pressure on civil society and political dissent in Georgia, reaffirms commitment to support", OSCE Office for Democratic Institutions and Human Rights, 7 July, 2025, https://www.osce.org/odihr/594597

virtually all major monitoring organizations in Georgia rely heavily on foreign donor support. Although these organizations refused to register and the Law has remained unenforced in practice, it remains formally in force and continues to pose a serious threat to the entire civil society sector.

In addition, on April 1, 2025, the Georgian Dream parliament additionally adopted the Law on Foreign Agents Registration Act¹³⁷ to restrict civil society organizations, the enactment of which further increased the risk of stigmatization of Georgian civil society organizations, especially against the backdrop of an intensified discrediting campaign. In addition, organizations and individuals faced a real and immediate existential and criminal threat, since, according to the *Georgian Dream*'s interpretation, everyone who receives support from abroad in any form must register as a foreign agent.¹³⁸

In April 2025, the *Georgian Dream* further restricted civil society by introducing accelerated amendments to the Law on Grants, significantly limiting the ability to receive foreign funding.¹³⁹ Under the new provisions, no organization may accept a foreign grant or alter its purpose without the prior consent of the Government of Georgia or an authorized body designated by it. The amendment also broadened the definition of a grant to include technical assistance in the form of technologies, expertise, skills, or other types of support. Compliance oversight was entrusted to the Anti-Corruption Bureau, which was granted significantly expanded powers. According to the Law, receiving a grant without government approval results in a fine double the value of the grant in question.¹⁴⁰ These amendments represent a serious violation of the right to freedom of association. The government retains discretionary authority to approve or deny grants without pre-established criteria, creating unpredictability and a high risk of politically motivated arbitrariness. The impact is already evident: the British Embassy was forced to cancel planned grants for voter education and citizen monitoring initiatives after being unable to secure government consent.¹⁴¹ Moreover, statements by the Georgian Dream leaders make clear that the government will refuse to authorize grants supporting leading election observation organizations, rendering the possibility of comprehensive election monitoring practically impossible.

In June 2025, the Anti-Corruption Bureau launched an active investigation into civil society organizations. ¹⁴² On June 23, it submitted a court order to ISFED, demanding virtually all information held by the organization between January 1, 2024, and June 10, 2025 - including legally protected personal data of its beneficiaries and partners. ISFED appealed the order to the Tbilisi Court of Appeal, but the appeal was not upheld. Similar demands were also sent to other civil society organizations. ¹⁴³ While some groups provided partial information, on August 11, the Anti-Corruption Bureau sent another letter to six civil society organizations, including ISFED, requiring them to explain why they had not registered in the "foreign agents" register. These actions demonstrate that the *Georgian Dream*, through state institutions

¹³⁷ Law of Georgia "Foreign Agents Registration Act", Parliament of Georgia, 399-IIθb-XIθ3, 01/04/2025. Accessed July 23, 2025. https://matsne.gov.ge/document/view/6461578?publication=0

¹³⁸ Some organizations have already taken certain steps to suspend their activities.

¹³⁹ Law of Georgia "On Amendments to the Law of Georgia "On Grants", Parliament of Georgia, 496-II0b-XI03, 16/04/2025. Accessed on July 23, 2025. https://matsne.gov.ge/ka/document/view/6475816?publication=0
140 Ibid.

¹⁴¹ "British Embassy Cancels Planned Grants Citing 'Uncertainty' of New Law," *Civil Georgiα*, June 11, 2025, https://civil.ge/ka/archives/686378

¹⁴² "Georgia: Court order on five independent NGOs a blow to freedom of association," *Amnesty International*, Accessed July 25, 2025, https://bit.ly/4lz8LOP

¹⁴³ 9 organizations in total.

entirely under its control, continues to weaponize recently adopted unconstitutional and undemocratic laws against civil society. Amnesty International has described such orders as yet another escalation in the repression of freedom of expression and association in Georgia, highlighting the misuse of the judiciary and the Anti-Corruption Bureau as instruments to suppress human rights defenders, activists, and independent civil society organizations. Activity of the property of the property

A significant obstacle to effective election observation may also arise from the April 3, 2025, amendments to the CEC Resolution 'On Determining the Rules and Conditions for Conducting Voting Using Electronic Means', which significantly restrict the rights of observers and limit meaningful monitoring of the electoral process. The amendments impose a blanket ban on individuals entitled to be present in polling stations to obstruct voter movement physically, request or take voter identification documents, or photograph/film documents containing personal data, verification records, receipts, or marked ballots. ¹⁴⁶

Under the Election Code, observers have the right to freely and unhindered monitor all stages of the voting process, including identification. In a context where public trust in the election administration is already low, restricting these rights diminishes the ability to detect violations in a timely manner. This is particularly concerning given the prevalence of practices such as voting with improper documents and multiple voting.

On March 4, 2025, amendments to the Election Code introduced a prohibition on leaders of observer organizations and observers from participating in pre-election campaigning or agitation.¹⁴⁷ While this measure may appear aimed at safeguarding the neutrality of observers, in the context of a biased election administration and judiciary, it poses significant risks. The provision could be broadly interpreted and selectively applied, turning what is presented as a safeguard into a tool for restricting the activities of observer organizations and silencing individual observers.

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¹⁴⁴ 'Anti-Corruption Bureau Requests Information on Beneficiaries from ISFED too', International Society for Fair Elections and Democracy. Accessed on July 23, 2025. https://bit.ly/4mQtnmk

¹⁴⁵ "Georgia: Court order on five independent NGOs a blow to freedom of association," Amnesty International, Accessed July 25, 2025, https://bit.ly/45CJo8t

¹⁴⁶ Resolution "On Determining the Rules and Terms for Conducting Voting Using Electronic Means" on Amending Resolution No. 7/2023 of the Central Election Commission of Georgia of February 6, 2023", Central Election Commission of Georgia, 22/2025. Accessed July 21, 2025. https://matsne.gov.ge/ka/document/view/6463976?publication=0

¹⁴⁷ "On Amendments to the Organic Law of Georgia "Election Code of Georgia", Organic Law of Georgia №332-II∂b-XI∂3, Parliament of Georgia, 04/03/2025. Accessed August 19, 2025. https://matsne.gov.ge/ka/document/view/6435783?publication=0#DOCUMENT

Appendix. Key Legislative Amendments Adopted Against Protest Participants

On December 13, 2024, amendments to the Law on Assemblies and Manifestations introduced new restrictions, including a ban on the use of masks, lasers, and pyrotechnics by protesters. The Venice Commission and OSCE/ODIHR have noted, however, that wearing masks can serve to protect demonstrators from retaliation. Subsequent amendments further tightened the Law by requiring prior notification to the administrative body within a 'reasonable time' for spontaneous assemblies and by prohibiting gatherings in closed spaces or buildings without the written consent of the owner. Whereas the previous version of the Law prohibited only the blocking of building entrances, highways, and railways during demonstrations, the revised wording expanded the restriction also to include bridges, tunnels, overpasses, and transport hubs designated by the municipality. The same amendments also extended restrictions on assemblies and demonstrations, allowing them to be limited not only in areas adjacent to administrative buildings but also inside such buildings - an option not included in the previous version of the Law. Additional prohibitions were introduced on the installation of temporary structures. Together, these changes greatly expanded the discretion of administrative bodies to impose spatial restrictions on assemblies and curb freedom of expression.

Amendments to the Code of Administrative Offenses further contributed to these limitations.¹⁵³ The fines and terms of administrative imprisonment for violations related to assemblies were significantly and disproportionately increased, producing a chilling effect on exercising the right to peaceful assembly and free expression.

The amendments introduced by the *Georgian Dream* to the Law on Freedom of Speech and Expression result in disproportionate interference with the right to free expression. ¹⁵⁴ Under the new provisions, the definition of defamation has been broadened: it is no longer necessary for a statement to cause actual harm to a person. The burden of proof has also been shifted - whereas previously it rested with the plaintiff, it is now placed on the defendant. Moreover, a key safeguard was removed: the rule that any unproven doubt should be resolved in favor of freedom of speech. Another critical change eliminates the

¹⁴⁸ Law of Georgia, "On Amendments to the Law of Georgia "On Assemblies and Manifestations", Parliament of Georgia, 176-Ιθυ-XΙθ3, accessed July 22, 2025. https://matsne.gov.ge/ka/document/view/6330362?publication=0

¹⁴⁹ Guidelines on Freedom of Peaceful Assembly, European Commission for Democracy through Law (Venice Commission), and OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR), Accessed July 22, 2025, Par. 150. https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2019)017rev-e

¹⁵⁰ Law of Georgia, "On Amendments to the Law of Georgia "On Assemblies and Manifestations", Parliament of Georgia, 274-IIθb-XIθ3, 06/02/2025. Accessed on July 22, 2025, https://matsne.gov.ge/ka/document/view/6407621?publication=0

¹⁵¹ By its decision No. 3/3/1635 of December 14, 2023, in the case Public Defender of Georgia v. Parliament of Georgia, the Constitutional Court of Georgia declared unconstitutional the normative content of Article 8(1) of the Law of Georgia On Assemblies and Manifestations. The provision in question required organizers to notify the municipal executive body at least five days in advance of holding an assembly or manifestation, even in cases where such notice was impossible due to the spontaneous nature of the gathering

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¹⁵³ Draft Law: "On Amendments to the Administrative Offenses Code of Georgia", Parliament of Georgia, accessed July 22, 2025, https://info.parliament.ge/#law-drafting/30044

¹⁵⁴ Law of Georgia, "On Amendments to the Law of Georgia "On Freedom of Speech and Expression", Parliament of Georgia, 825-II∂b-XI∂3, 26/06/2025. Accessed on 22 July 2025. https://matsne.gov.ge/ka/document/view/6544501?publication=0

legal guarantee protecting defendants who refuse to disclose professional secrets or sources of information, thereby undermining the protection of source confidentiality - an obligation anchored in journalistic ethics. The qualified privilege in defamation cases has likewise been abolished. ¹⁵⁵ Collectively, these amendments substantially curtail freedom of expression, erode legal protections for journalists, and create a chilling effect on public debate.

The amendments to the Code of Administrative Offenses of Georgia should also be considered a norm restricting freedom of expression, according to which verbal insults, cursing, insulting or other offensive actions against a Georgian state-political official, political official, pubulic servant, person equated with a public servant during the performance of official duties or in connection with the performance of official duties or activities (except for cases provided for by the Criminal Code of Georgia) are considered an administrative offense. ¹⁵⁶ In the absence of independence of the judicial system and conditions of political arbitrariness, the aforementioned norm, by its content, becomes a convenient legal lever for the authorities to suppress dissent and strengthen self-censorship among citizens. This is also confirmed by the fact that the discussed norm has already been used as a punitive mechanism against civil activists.

¹⁵⁵ Partial or conditional exemption from liability established by law

¹⁵⁶ Law of Georgia "Code of Administrative Offenses of Georgia", Parliament of Georgia, 161, 15/12/1984, Article 173¹⁶. Accessed on August 16, 2025. https://matsne.gov.ge/document/view/28216?publication=593