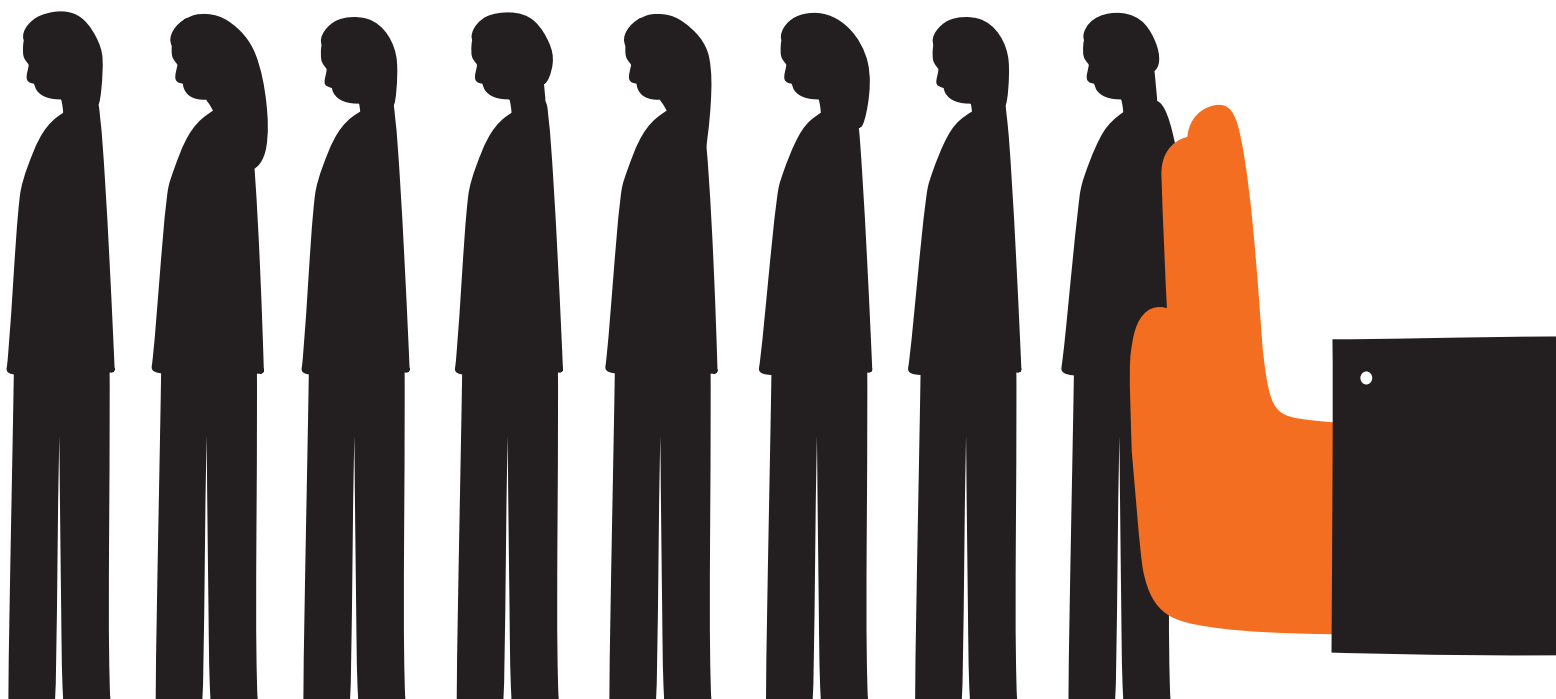


CRTA:

# CRTA Preliminary Statement on **ORGANIZED VOTER MIGRATION** Ahead of the December 17, 2023 Elections in Serbia

Belgrade, December 22, 2023



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**Organized voter migration is a type of electoral engineering that includes coordinated behavior of voters that temporarily change their residence to another constituency to influence voting results.** In Serbia, in the Elections 2023 it might have been used on a large scale to influence the outcomes of the local elections strategically called only in one part of cities and municipalities.

**Organized voter migration is neither legal nor legitimate.** Applying for fictitious residences to use the voting right in another constituency violates the acting law regulating citizens' residences in Serbia. It also undermines electoral equality and substantially infringes upon the guaranteed right to local self-government.

**CRTA Election Observation Mission has actively collected evidence and conducted analyses about the organized voter migration before, during, and after Election Day.** Qualitative evidence was collected from citizens and informants before the elections, by CRTA's observers in and around polling stations during Election Day, and by collecting statements by political actors confirming or even justifying the practice. Additional analysis was done using quantitative data collected from the voter register excerpt and the polling station-level election results.

**When manipulation of the voter register happens on a big scale, it cannot be kept secret.** Information about anomalies in the voter register was collected from citizens before Election Day, which raised attention to possible issues. Parallel insider information about voter migration confirmed these suspicions. Several testimonies were collected, indicating possible activity from within the ruling party organization, from local municipal administration, and even manipulation from the central level.

**Crucial pieces of evidence were collected on Election Day by CRTA observers at the representative sample of polling stations in Belgrade.** Photographic or video evidence was collected of large-scale organized migration of voters from within other regions in Serbia and from abroad. CRTA observers recorded several logistical centers from where the voters were sent to polling stations across Belgrade. Instances of organized voter transportation, supervised voting, or irregularities that point to potential voter identity manipulations were identified at 14% of all polling stations in Belgrade.

**An additional analysis was performed after Election Day, using quantitative data from the official voter register excerpts and the voting results.** It showed a substantial scope of changes in the voter register on an annual level that should be further scrutinized. The analysis helped identify polling stations in Belgrade with a high probability of being a destination for organized migration of voters, and it associated such polling stations with an increased number of votes for the incumbent.

**Political actors themselves provided external validation for this analysis.** Several senior politicians or government officials from Serbia and Bosnia and Herzegovina explicitly confirmed such practice exists or even justified it as legal or legitimate. It was neither.

**CRTA Election Observation Mission strongly believes organized voter migration may be a serious challenge to the quality of elections in Serbia and will be difficult to tackle.** In the preliminary statement on Election Day, CRTA assessed that the results of the elections in Belgrade do not reflect the freely expressed will of voters living there. If this practice persists, with regular local elections scheduled in less than six months, there is little time to address these issues. This is why we close this preliminary statement with recommendations that might put an end to it.

## 1. The election context

**Organizing voter migrations involves coordinated behavior of voters that temporarily change their residence to another constituency to influence voting results.** As the Serbian electoral system has a single constituency, this phenomenon has until now been marginal in the country. However, due to specific circumstances of strategically calling snap local elections in a third of cities and municipalities, the opportunity was created to use this method of electoral engineering on a large scale. Organized voter migrations are neither legal nor legitimate. However, they have been increasingly common in neighboring countries. Their use is possible due to untransparent voter registries and the unsanctioned abuse of law regulating residences.

### *Strategic calling of elections*

**The reasons behind the decision to call elections in certain parts of Serbia remained unclear. However, it could be argued that calling the elections in selected local self-governments made favorable conditions for organized voter migrations.**

**After less than two years, snap elections for all three levels of government – parliamentary, provincial, and local – have been scheduled for December 17, continuing the decades-long practice of consolidating elections in a single day.** Early elections were held for the members of the National Assembly of the Republic of Serbia, the city assembly members of Belgrade, and 65 local administrations of cities and municipalities. The elections for the Assembly of the Autonomous Province of Vojvodina, held on the same day, were also announced on November 16, 2023.

**The scheduled parliamentary elections mark the second snap election in a year and a half and the third held in the past four years.** While snap elections have been part of Serbia's political life since the introduction of multi-party systems, in the last decade, they have not been called due to the instability of ruling coalitions but rather due to political calculations.

**At the local level, snap elections were called for only a third of the municipalities, leaving the second group to wait for their regular local elections in six months.** The decision to select a portion of municipalities for local elections was unprecedented in previous election practices, lacking reasonable explanations and a strong indicator of potential abuse of power to gain an unfair advantage.

**The largest cities where snap local elections occurred in 2023 included Belgrade, Vranje, Novi Pazar, Kragujevac, Leskovac, and Šabac.** However, although the elections for the Belgrade city assembly took place on December 17, they have not been called for any of its 17 city municipalities. Major cities without local elections in 2023 include Novi Sad, Niš, Čačak, Valjevo, Jagodina, and Užice. Elections were also not held in all 45 municipalities and cities in Vojvodina. Most local self-governments with early local elections are located in the regions of Southern Serbia, Šumadija, and Mačva.

### *Untransparent voter register*

**The Serbian voter register is passive, meaning citizens do not have the obligation to register for voting.** It is maintained by the Ministry of Public Administration and Local Self-Government,

based on data on registered permanent residence, which it receives from the Ministry of Interior. It has been centralized since 2011, and before, it was the responsibility of local authorities.

**Voter register accuracy has been one of the most consistently controversial issues in the Serbian electoral process.** The main source of controversy is a substantial mismatch between the voting age population in Serbia and the number of voters in the register. This is a well-known regional problem in countries with similar types of voter registries and extensive migrations - similar issues stem from citizens leaving the country but maintaining residence and voting rights in the home country.

**There are clear consequences of this decades-long controversy.** Different surveys in the last couple of years<sup>1</sup> show that more than half of the citizens of Serbia believe that the voter registries does not contain accurate data, while half of those believe that the data is manipulated for electoral gain. In the last instance, in February 2022, just months before the previous elections, the issue surfaced regarding “phantom” voters in an abandoned house in central Belgrade.

**To address this, OSCE has had a longstanding priority recommendation from 2012 to 2022 for Serbian authorities to conduct a comprehensive independent audit of the register,** with the participation of relevant stakeholders. However, these recommendations remain unaddressed. In 2020, OSCE/ODIHR also recommended for voter register to be available for public scrutiny and that authorities periodically publish voter registration data per municipality. These recommendations were partially addressed - the ministry now publishes quarterly aggregate numbers of registered voters per municipality and voter register excerpts in the form of a list of voters' names per polling station.

**However, none of these changes has had the expected effect, as the citizens still do not have sufficient insight into the voter register.** Without unique identifiers, such as middle names or addresses, it is not possible to identify potential voters who should not be in the voter register. To make things worse, since 2022, the polling station notifications sent to home addresses no longer contain apartment numbers and instead use the internal postal system of postbox identification, which added to the rising suspicion of fictitious names and voters in the register.

#### *Fictional residences*

**Organized voter migration is a phenomenon that hinges upon fictional residences. However, this is neither legal nor legitimate practice and does not follow electoral law's fundamental principles.**

**Every citizen of the Republic of Serbia has the right to settle in any part of its territory and declare residency there.** The Constitution of the Republic of Serbia in Article 39 stipulates that everyone has the right to move and reside in the Republic of Serbia freely. At the same time, the Law on Permanent and Temporary Residence of Citizens (LPTR) in Article 2 determines that the right to residence in the Republic of Serbia belongs to all citizens of the Republic of Serbia who permanently live on the territory of the Republic of Serbia.

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<sup>1</sup> CRTA, *Audit of Political Engagement in Serbia in 2018*, March, 25, 2019, <https://crtars/en/audit-of-political-engagement-in-serbia-2018/>; CRTA, *Survey: Democracy on the Marging of the War*, June 15, 2022, <https://crtars/en/survey-democracy-on-the-margin-of-the-war/>

**However, the LPTR in Article 3 defines residency as a place where a citizen settles intending to live permanently or where the center of their life, economic, social, professional, and other connections exist that prove their continuous connection to that place.** Accordingly, citizens who register residency in Belgrade or any other city or municipality have the right to do so only if they intend to reside there permanently. Otherwise, such registrations would not be legal and would be a matter of circumventing the law. Hence, the Ministry of Internal Affairs (MIA) has the authority to accept the residency registration only if it can be established that the citizen intends to reside at the address they are registering permanently (Article 13 of LPTR). Article 3 of the Regulation specifies that the MIA official verifies the data from the residency registration and issues a residency registration decision if it is established that the citizen intends to reside permanently at the address they are registering as residency. These data are then entered into the residency records kept in electronic form.

**Fictional residences are illegal and violate the rights of other citizens residing in the given city, especially the right to local self-government.** The equality of electoral rights implies that one voter has one vote, but it also requires ensuring equal representation when forming electoral units. This is guaranteed by the Constitution in Article 52, the Law on Election of MPs (LEMP) in Article 5, and the Law on Local Elections (LLE) in Article 5. One of the most famous cases of violating the equality of electoral rights is the so-called gerrymandering, which has become synonymous with electoral manipulation. It primarily involves the deliberate redrawing of boundaries between electoral units to undermine the equality of elections. However, gerrymandering also entails clustering so-called safe voters into a larger number of small electoral units to gain an advantage for the ruling party or coalition over other election participants. This fact becomes significant if we consider that on December 17, local elections were held, but only in some units of local self-government, only in 66 out of 174.<sup>2</sup> Migration of voters to the electoral municipalities gives the undue advantage over other participants in the electoral race in the capital. Therefore, although Serbia is not divided into electoral units, the fact that local elections were not held in all units of local self-government created the possibility of clustering safe voters of the ruling coalition in the city of Belgrade (one electoral unit), thus creating a new form of electoral manipulation.

**Residency within the territory of the unit of local self-government is prescribed as a specific and additional condition for enjoying the electoral right in local elections.** Article 176 of the Constitution states that citizens have the right to local self-government, which they exercise directly or through their freely elected representatives. The Law on Local Self-Government stipulates in Article 2 that local self-government is the right of citizens to directly manage public affairs of immediate, common, and general interest for the local population through local assemblies or councils. The Law on Local Elections in Article 3 stipulates that the electoral right in local elections belongs to an adult citizen of the Republic of Serbia who is not under extended parental care, i.e., who is not completely deprived of business capacity and who has residency within the territory of the unit of local self-government where they exercise their electoral right. Thus, voters who change residency and register within the territory of the new local self-government unit also acquire the right to vote and the right to local self-government, which they can exercise in that city. Suppose the allegations are true and these citizens only register residency (formally have residency) in Belgrade without meeting the conditions from Article 3 of the Law on Permanent and Temporary Residence of Citizens (LPTR). In that case, it raises the question of the legitimacy of their participation in elections where they had the opportunity to

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<sup>2</sup> Elections in 65 local self-governments were called by the Speaker of the Parliament, while in Vranjska Banja, that is Vranje city municipality elections are called by the President of Vranje Assembly.

"shape the fate" of citizens who have genuine residency (formally and substantively) in the capital city. In this manner, they undermine the right to local self-government of the citizens of the city they "migrated to" by being able to directly or through freely elected representatives (in elections) influence the management of affairs that are of immediate, common, and general interest to the citizens.

**Therefore, the organized migration of voters jeopardizes the democracy and integrity of the electoral process. Such a practice is neither legal nor legitimate. It undermines the equality of elections in the capital city and substantially infringes upon every citizen's constitutionally and legally guaranteed right to local self-government.**

*Organized voter migrations - concept and practice*

**Organized voter migrations are a type of electoral engineering that involves the coordinated behavior of voters that temporarily change their residence to another constituency to influence voting results, irrespective of its legality.**

**In recent years, claims of organized voter migrations, often called voting tourism, have run rampant in several neighboring countries: Hungary, North Macedonia and Montenegro.** In all three cases, these sorts of electoral manipulations were used by authoritarian incumbents as a vehicle for securing safe votes and electoral victories. While until 2023 these practices were sporadic in Serbia, this is the first time organized voter migrations featured prominently in the electoral process.

**Allegations of organized voter migrations, or voting tourism, have become increasingly frequent in previous election cycles in Hungary.** Phantom voters, believed to be granted the right to vote by manipulating voter registers by fictitious address declarations, were largely thought to have been brought in from Ukraine, Serbia and Romania to vote in national elections in Hungary<sup>3</sup>. In 2018, the string of anomalies relating to the organized bringing of voters to vote in the Hungarian elections reached the highest scale<sup>4</sup>. Former Ukrainian officials confirmed that hundreds of people were transported from Ukrainian cities bordering Hungary across the border to vote for Orbán's Fidesz. Additional allegations state that the number of eligible voters increased by 5,000 in one border precinct. Ahead of the 2022 Elections, the Fidesz government decriminalized the creation of fictitious addresses, which was widely considered to be a legalization of cross-border organized voter migration.

**Previous election cycles in North Macedonia were also marred with suspicions of voting tourism, falsification of personal documents, and organized bringing of groups to vote in national elections.** Organizations have noted that irregularities were consistent with electoral engineering related to an 'industry of producing forged personal IDs and passports' and the insertion of non-existent streets and building numbers in the voter register<sup>5</sup>. Some reported cases state that in Skopje, Resen and Kichevo, dozens of voters, mostly from Albania, were registered to a single apartment. In the infamous 'Titanic' case, news cameras caught ethnic

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<sup>3</sup>Hungary 2022: Election Manipulation and the Regime's Attempts at Electoral Fraud

<https://democracyinstitute.ceu.edu/sites/default/files/article/attachment/2022-03/Hungary%202022%20Manipulated%20Elections.pdf>

<sup>4</sup> Fresh evidence of Hungary vote-rigging raises concerns of fraud in European elections

<https://www.opendemocracy.net/en/breaking-fresh-evidence-hungary-vote-rigging-raises-concerns-fraud-european-elections/>

<sup>5</sup>CAPTURED STATE: UNDERSTANDING THE MACEDONIAN CASE <https://library.fes.de/pdf-files/bueros/skopje/15211.pdf>

Macedonians from Albania voting as Skopje residents<sup>6</sup>. The focus on electoral engineering intensified following the 2011 snap parliamentary elections.

**Finally, elections in neighboring Montenegro have been plagued by accusations of voter migrations, especially for the local elections.** Ahead of the 2020 Parliamentary elections in Montenegro, reports of phantom voters surfaced, suggesting that 50,000 phantom voters would be eligible to vote in the next election<sup>7</sup>. Some noted examples in this electoral cycle include instances in which the number of voters exceeded the actual population and cases in which more than half of the names in the voter register were listed without a valid address. In 2022, there were repeated instances of alleged voting tourism in Montenegro around local elections<sup>8</sup>. One case was the municipality of Šavnik, in which there was an increase in the voting body of almost 20 percent.

## 2. Evidence collected before the Election Day

**Multiple pieces of evidence collected before Election Day showed that when manipulation of the voter register happens on a big scale, this cannot be kept secret.** CRTA Election Observation Mission received multiple testimonies from citizens and insiders in the weeks before December 17. No personal names or specific contexts are disclosed to protect insider safety and citizens' privacy, but these cases are documented in great detail.

**The number of citizens calling CRTA reporting unusual problems with the voter register was higher than ever and raised first suspicions.** When CRTA began collecting information, the number and type of testimonies and insider information were overwhelming: even before the Election Day, information was collected about voter migration from inside the party organization, from local municipal administration, and about manipulation from the central level.

### *Citizens calling*

**During the 2023 elections, a record number of citizens contacted CRTA to report voter registration-related issues. Some of their experiences were particularly strange and raised suspicions.**

One person from Belgrade was allowed to vote only in the local elections but not in the parliamentary because, in the voter register for those elections, their address was registered in Berane (Montenegro). This person has lived all their life at the same address in Belgrade and has never even visited Berane.

A young person from Belgrade who recently turned 18 and became eligible to vote could vote in municipal elections, but for the parliamentary elections, was registered in Zrenjanin, a town in Vojvodina, for unknown reasons.

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<sup>6</sup> Macedonian Ex-Ministers Suspected of Election Fraud.

<https://balkaninsight.com/2016/02/12/former-macedonian-ministers-suspected-for-election-fraud-02-12-2016/>

<sup>7</sup>Army of 'Phantom Voters' Casts Doubt over Fairness of Montenegro Vote

<https://balkaninsight.com/2020/07/23/army-of-phantom-voters-casts-doubt-over-fairness-of-montenegro-vote/>

<sup>8</sup> 'Izborni turizam' u borbi za glasove u 14 crnogorskih opština

<https://www.slobodnaevropa.org/a/lokalni-izbori-14op%C5%A1tina-in%C5%BEinjeriing/32089929.html>



Also, many citizens reported receiving notifications for the elections for their family members who had died a long time ago (and were not receiving invitations for the previous elections held last year).

#### *Case 1: Party-organized migrations*

**Cases like this raise doubts that the local elections were called on to enable the organizing of manipulative voter migration to boost the Serbian Progressive Party results.**

A few weeks before the Election Day, CRTA got approached by a person from a municipality that borders the administrative territory of the City of Belgrade. The elections were not called in this municipality. This person wanted to share what was happening with their parent, an elderly person who lives in a village just behind the “border” of Belgrade.

As they said, their parent is a supporter of Aleksandar Vučić. They got a call from the local committee of the Serbian Progressive Party with a question about whether they were willing to support President Vucic, and they answered positively. So, they were told a day and time when to show up at the local police station and bring their ID.

At the police station, there were about 20 people who came to do the same task. This person got registered at a new permanent residence, one situated in the neighboring village, which administratively belongs to one of Belgrade’s suburban municipalities and whose inhabitants should vote in the forthcoming Belgrade city elections. A local Serbian Progressive Party activist gave them (and others from the group) 2,000 dinars each and told them they would get 2,000 more after they voted in a few weeks.

When this person returned home, they got upset and asked their child (who shared the experience with CRTA) – “Where am I supposed to go to see a doctor?” (primary medical care in Serbia is organized on a municipal level.) The child disclosed their parent’s data to CRTA, so CRTA tracked the person in the publicly available excerpt of the voter register (**Photo 1**), and five days later, the person’s name appeared with their “new address,” on the grounds of which they would be eligible to vote in the Belgrade Elections (**Photo 2**).

On Election Day, CRTA observers confirmed that this person did vote at the new polling station, where they were driven to with others from their village.

A few days after the election date, CRTA found this person no longer visible in the online voter register excerpt. (**Photo 3**)

Photo 1. Inquiry in voter register before change of address from non-voting municipality to Belgrade municipality, 18 November 2023

Преглед броја бирача Преглед бирача

УПИТ У ЈЕДИНСТВЕНИ БИРАЧКИ СПИСАК

JMBG: [118]

Документ: Лична карта Пасош

\*унесите број личне карте/пасоша са свих девет цифара (Рег.бр./Бр. пасоша)

**Datum: 18. novembar 2023.**

ПОНОВИТИ ТЕКСТ СА СЛИКЕ: VUIF

Претражи

Бирачко место на председничким / парламентарним изборима: [REDACTED], СМЕДЕРЕВО - ГРАД

Бирачко место на локалним / покрајинским изборима: [REDACTED], СМЕДЕРЕВО - ГРАД

ит у бирачки списак приказује податак о бирачком месту да ће бирач на пре парламентарним изборима аном месту гласања у земљи или иностранству, као и по месту боравишта за лица, / покрајинске изборе приказује податак за гласање бирача само по месту пр остатке уочене након извршеног упита у Јединствени бирачки списак потр ађанин поднесе захтев за промену (упис, измена, допуна, исправка или бри у бирачком списку општинској односно градској управи према месту пребивалишта, односно боравишта за интерно расељена лица.

Photo 2. Inquiry in voter register after change of address from non-voting municipality to Belgrade municipality, 30 November 2023

Република Србија  
МИНИСТАРСТВО ДРЖАВНЕ УПРАВЕ И ЛОКАЛНЕ САМОУПРАВЕ

Преглед броја бирача Преглед бирача по бирачком месту

УПИТ У ЈЕДИНСТВЕНИ БИРАЧКИ СПИСАК

JMBG: [118]

Документ: Лична карта Пасош

\*унесите број личне карте/пасоша са свих девет цифара (Рег.бр./Бр. пасоша)

**Datum: 30. novembar 2023.**

ПОНОВИТИ ТЕКСТ СА СЛИКЕ: TRNK

Претражи

Бирачко место на председничким / парламентарним изборима: [REDACTED], БЕОГРАД-ГРОЦКА

Бирачко место на локалним / покрајинским изборима: [REDACTED], БЕОГРАД-ГРОЦКА

АПОМЕНА: Упит у бирачки списак приказује податак о бирачком месту да ће бирач на председничким / парламентарним изборима према изабраном месту гласања у земљи или иностранству, као и по месту боравишта за интерно расељена лица, док за локалне / покрајинске изборе приказује податак за гласање бирача само по месту пребивалишта.

За недостатке уочене након извршеног упита у Јединствени бирачки списак потребно је да грађанин поднесе захтев за промену (упис, измена, допуна, исправка или брисање) у бирачком списку општинској односно градској управи према месту пребивалишта, односно боравишта за интерно расељена лица.

Photo 3. Voter was consequently erased from the voter register after Election Day, the inquiry made on 21 December 2023

Република Србија  
МИНИСТАРСТВО ДРЖАВНЕ УПРАВЕ И ЛОКАЛНЕ САМОУПРАВЕ

Преглед броја бирача Преглед бирача по бирачком месту

УПИТ У ЈЕДИНСТВЕНИ БИРАЧКИ СПИСАК

JMBG: [118]

Документ: Лична карта Пасош

\*унесите број личне карте/пасоша са свих девет цифара (Рег.бр./Бр. пасоша)

**Datum: 21. decembar 2023.**

ПОНОВИТИ ТЕКСТ СА СЛИКЕ: jue

Претражи

УНЕТИ ПОДАЦИ НИСУ ВАЉИВНИ

НАПОМЕНА: Упит у бирачки списак приказује податак о бирачком месту да ће бирач на председничким / парламентарним изборима гласати према изабраном месту гласања у земљи или иностранству, као и по месту боравишта за интерно расељена лица, док за локалне / покрајинске изборе приказује податак за гласање бирача само по месту пребивалишта.

За недостатке уочене након извршеног упита у Јединствени бирачки списак потребно

### *Case 2: Local administration's involvement*

**This case illustrates one of the mechanisms through which the local public administration servants get involved in illegal and corrupt practices.**

An attorney-at-law from a town close to the state border of Serbia and Bosnia Herzegovina contacted CRTA in the early days of the election campaign, willing to share their client's experience.

One day, their client, who has been employed as the municipal Division of Vital Records' clerk for many years, was given by their superiors 67 IDs of persons from Bosnia Herzegovina (Republic of Srpska entity), with a demand to change the permanent residence for all of them. The clerk decided to take photos of those IDs; since they were caught while doing so, they got taken off the task, but managed to preserve some of the photos.

After the initial meeting with the attorney, two lawyers from the Legal Team of CRTA travelled to the border town to meet this attorney-at-law and his client. Analyzing the available documents and data, they found out that 67 persons from the villages and towns in Bosnia and Herzegovina (Republic of Srpska) along the state border with Serbia, on September 21, all got registered in the voter register of Serbia with permanent addresses in the municipality of Surčin, one of the suburban municipalities of Belgrade.

Further, they came upon a surprising finding that on November 23, the temporary residences for all those people got registered in the municipality where our source, the employee of the Division of Vital Records, lives (local elections were held in that municipality, too).

### *Case 3: Centralized manipulation*

**In this case, two insiders testified to a centralized level of manipulation of the voter register.**

In CRTA's attempts to comprehend the voter register misuses, two "insiders" we have made contact with were extremely helpful. One of them is a member of the local electoral commission in one of the City of Belgrade's municipalities, and a member of the Serbian Progressive Party, and the other one is a clerk in charge of voter register maintenance in a municipality in Serbia in which local elections were not held.

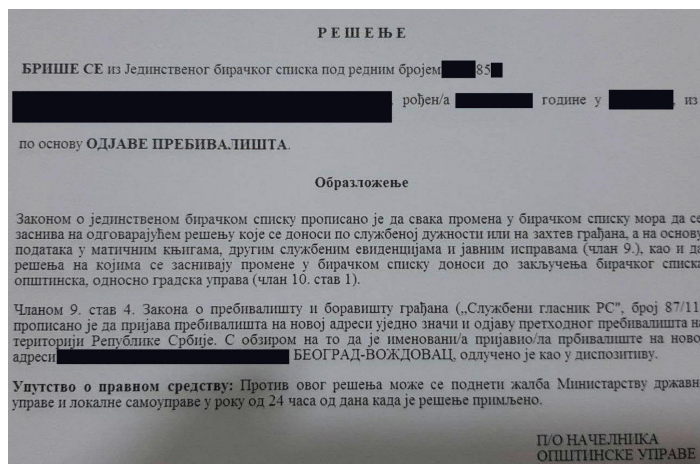
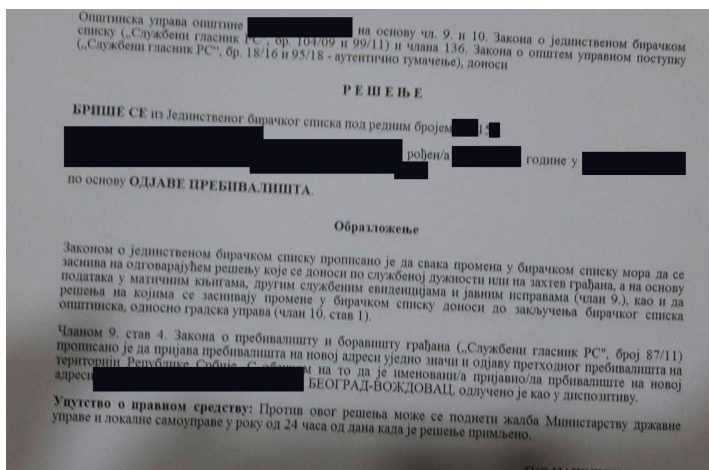
The "Insider A", claiming that they would gladly "not be a part of it", spoke about how their party has unauthorized (illegal) access to data in the voter register, which they use to indicate who needs to be passivized or erased to control the "balance" when adding new voters. Obviously, "errors" are being made, so the situations occur, as many citizens have reported to CRTA, that voters cannot be found in the voter register at polling stations where they have been voting for decades.

The "Insider B" depicted the situation in which they, as clerks of the local self-governance, were completely unaware and had no track of changes in the voter register of their municipality that were being made on the "centralized" level – by the Ministry of Public Administration and Local Self-Government. They spoke of a case in which they, following the police order, erased several persons from the register, but after a while, they found out that one of those persons, whom they knew personally and knew was dead, "resurrected" in the voter register.

Examples of decisions in which CRTA had insight, proving that through centralized manipulation, permanent residencies of people in non-voting municipalities in Serbia were changed for the purpose of assigning them new ones in Belgrade, are provided in **Photo 4** and **Photo 5**.

Photo 4. Decision on changing permanent residency from the non-voting municipality in Serbia for the purpose of assigning permanent residency in Belgrade; an example of centralized manipulation

Photo 5. Decision on changing permanent residency from the non-voting municipality in Serbia for the purpose of assigning permanent residency in Belgrade; an example of centralized manipulation



### 3. Evidence collected from Election Day observation

**Evidence collected on Election Day was wide in scope and corroborated evidence collected beforehand. In Belgrade, CRTA observers reported 71 polling stations with instances of organized voter transportation, supervised voting, or irregularities that point to potential voter identity manipulations.** This is a high ratio of around 14% of all polling stations in Belgrade, which were mainly distributed in large central and suburban municipalities of Belgrade: Čukarica (10), Paličula (9), Novi Beograd (9), Vračar (7), Voždovac (7), and Zemun (7).<sup>9</sup> This report's section consists of several illustrative examples for which CRTA's observers gathered photographic or video evidence. The magnitude of such occurrences goes way beyond these illustrative examples.

**Organized voter transportation recorded at these polling stations included voters from other municipalities across Serbia where local elections were not taking place, such as Pančevo, Valjevo, Aranđelovac, Smederevo, Novi Sad, Vršac, etc.** Observers also recorded that people from Kosovo, Bosnia Herzegovina and Croatia were also part of voter migrations recorded at polling stations across Belgrade. Many cases also included organized Roma transportation. Buses, vans and cars conducted organized transportation of voters, and CRTA observers recorded several logistical centers from where these voters were sent to polling stations across Belgrade. These logistical centers include the Štark Arena and small logistical meeting points in cafes or restaurants in other parts of Belgrade, usually nearby polling stations.

<sup>9</sup> CRTA Election Observation Mission monitored Election Day at two representative samples. One was a national sample, and the other was a representative sample of 500 polling stations in Belgrade.

**These cases were rarely isolated from elements pointing to different forms of election corruption and fraud** - including vote-buying, carousel voting, and ballot box stuffing. CRTA recorded indications that voter identity, and therefore voter register, was potentially manipulated at many of these polling stations - including breaches of established procedures for voter identity check, already signed excerpts, people who could not find themselves in voter register excerpts for Belgrade elections, and breaches of rules for voting outside of polling stations.

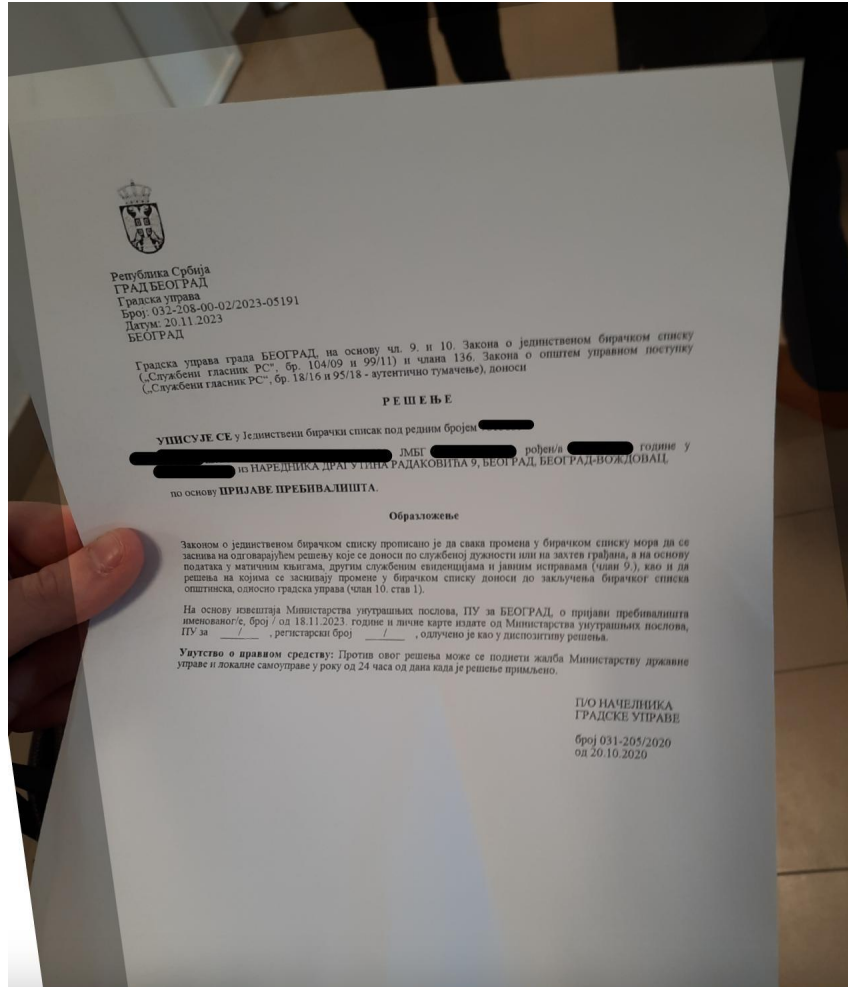
**In many recorded situations, polling board members and third parties inside and outside the polling stations were crucial in facilitating these irregularities.** People from different towns in Serbia were being brought to vote at one polling station, bringing a decision on residency change, which they previously received near one polling station in Voždovac. On the other hand, a group of Roma persons, before voting, received papers from a person in front of the polling station in Zemun that looked like voting invitations and were previously collected from the polling board. Except for coming in groups of different sizes and in different vehicles, these voters were also showing similar behavior. In many situations, they had difficulties finding their polling stations, indicating unfamiliarity with the surroundings.

#### *Organized migration of voters*

Observers reported seeing vehicles from other cities in front of Belgrade polling stations and groups of people from other cities who appeared disoriented and unable to locate their polling stations. Additionally, they observed suspicious voter activities and behavior near the polling stations, including some individuals carrying similar papers and visiting specific locations before and after casting ballots.

**One of the cases recorded in the municipality of Voždovac illustrates these concerns.** The observer saw that many people gathered around the building housing the voting stations and that, upon voting, they returned to the same place from which they departed as a group. Following these groups, the observer identified a cafe near the polling station where these individuals congregated before and after voting. The observer also noticed that each of them received a piece of paper with a decision on enrollment in the voter register based on their registration of permanent residence (**Photo 6**). This suggests that there may have been some sort of coordination or organization happening at this cafe, potentially influencing the voting process. The presence of organized voting and the dissemination of a decision on enrollment in the voter register indicate a deliberate effort to influence the outcome of the elections by bringing in individuals who otherwise would not be eligible to vote in that location.

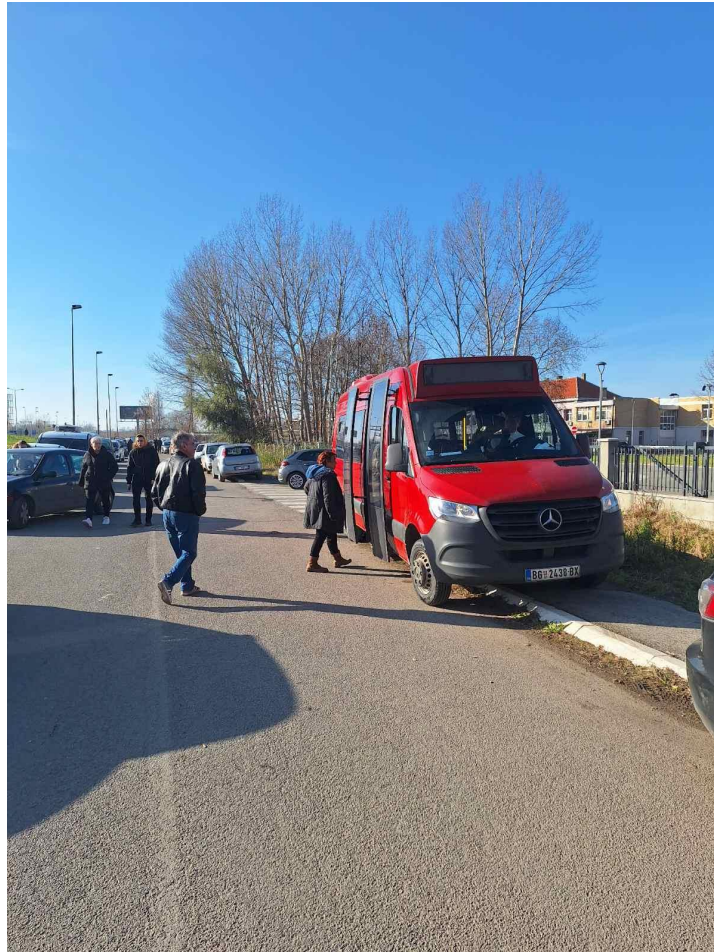
Photo 6: A decision on enrollment in the voter register based on the registration of residence



In another example, organized voter transportation from Kosovo to the municipality of Palilula's Krnjača neighborhood was also documented (Photo 7). In this area, a member of the CRTA mobile team observed several vans and individuals returning from voting. The observer had a bad experience during the conversation since they insulted them, tried to grab their phone, and threatened them. The unpleasant situation was captured on camera.



Photo 7: Voters from Kosovo entering the van, Krnjača, Belgrade



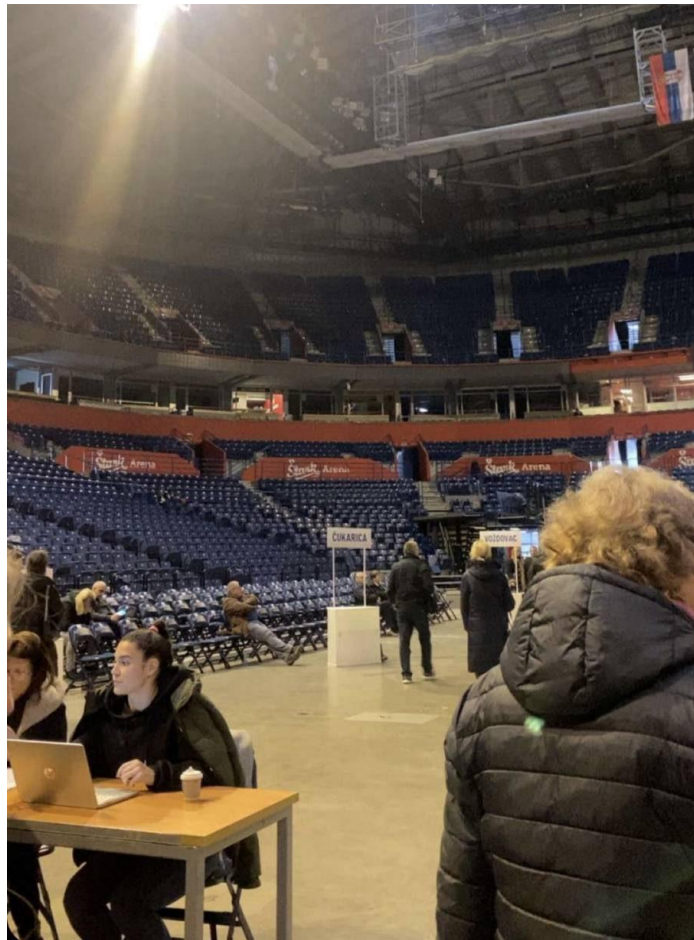
#### *Voters from Bosnia and Herzegovina*

**CRTA's observers identified several locations where the organized voters migrated from Bosnia Herzegovina (Republika Srpska Entity).** These included, most notably, the Belgrade Arena, the Kvantaš market, the Zmaj shopping center, and various locations in the city suburbs. Even though these were not the only organized voters in the December 17 elections, the media and public attention were focused on the case of these voters.

**The spacious indoor sports venue, Belgrade Arena, was transformed into the main gathering place amid the surge of voters, mainly from Republika Srpska.** Observers reported seeing private security personnel in front of the Arena, many buses and vehicles from Bosnia and Herzegovina, and groups coordinating voter transportation to and from polling stations. The scheme entailed welcoming voters, facilitating their registration inside the Arena, assigning voters to polling stations, arranging complimentary transportation using party-organized buses, vans, taxis and private cars, and bringing them back to the Arena. The process inside the Arena was equally well organized (**Picture 8**). Party activists sat with voter registers in stands marked

with the names of municipalities in Belgrade set up in the Arena's central area. Following their guidance to the stands containing voter registers, approximately sixty-person groups under the direction of a leader were assigned to booths according to the municipality in which they were to cast their ballots. A witness who spoke with CRTA claimed that party-organized cars (6-7 vehicles per municipality) transported voters who arrived by bus to polling stations. The observers have noticed these vehicles at several polling stations throughout the day.

Photo 8: Inside the Belgrade Arena



**Following the Republic Electoral Commission representatives' visit to the Arena to verify the allegations circulated by the media throughout the day, voters from Republika Srpska were redirected** to the second location, the Kvantaš market, in the same municipality (**Photo 9**). Both the witness who spoke with CRTA and provided the photographic evidence and the CRTA's observers have confirmed the presence of numerous buses and other vehicles at the Kvantaš market location.



Photo 9: Upon discovering the Arena, buses have been relocated to the Kvantas market.



**CRTA observers discovered another location, near Zmaj Shopping Centre in Zemun, where buses with the voters from Republika Srpska were directed.** Around 15 mini-buses from Republika Srpska were noticed there, and this occurrence was video-documented.

#### *Mechanisms of voters' control*

**Organized voting of people from neighboring countries and Serbian cities is connected to claims and evidence concerning vote buying and other forms of influencing voters.** The corruption and clientelism only culminated on Election Day when the previously speculated processes became less subtle and thus more visible.

**On Election Day, the electoral corruption mechanism included people managing the lists of voters who had arrived at the polling stations located in vehicles or venues surrounding the polling stations.** "Rewards" to voters were often given in the vehicles right after the vote had been cast. The physical presence of local coordinators around polling stations was also evident. CRTA gathered observers' claims about the people in the cars with some sort of lists, the cars where the voters went after casting their votes.

**CRTA further noticed a common behavioral pattern among people with lists surrounding the polling stations.** People with lists would not return to the polling stations once confronted by CRTA's mobile teams. However, these party coordinators would ignore observers inside the poll and would return to the polling station once the mobile teams left. This caused CRTA's mobile teams to arrive several times at the same polling station, each time with the same result.

**Another control element is direct observation of polling stations, which occurs differently.** However, most commonly, as instructed in the call center of the Serbian Progressive Party, voters should deliver proof of loyalty by photographing their vote (usually with their ID next to

the paper). Our observers were able to catch this phenomenon when voters forgot to turn off the flashlights on their phones and once when it happened right in front of the CRTA's observer.

#### 4. Quantitative analysis of voter register

**Besides evidence collected before and on Election Day, an additional analysis was performed after Election Day, using quantitative data from the official voter register excerpts and the voting results.** Despite shortcomings of the available data, a rudimentary analysis could be performed to show that 1) the scope of changes in the voter register is substantial on an annual level and should be further scrutinized, 2) it is possible to identify outlier polling stations in Belgrade with high probability of having received voters from outside of Belgrade, and 3) the identified polling stations that might have been targeted with organized migration of voters can be associated with more votes for the incumbent party.

**This analysis is based on the personal name frequency in the voter register excerpts for parliamentary elections in 2022 and 2023, which included more than 13 million personal names.**<sup>10</sup> Data was obtained from the public records maintained by the Ministry of Public Administration and Local Self-Government. The data in the excerpt contains only name and surname, polling station identifier and municipality, and has no unique identifiers such as middle name, ID number, or addresses of voters. One potential way of analyzing the voting register excerpt is through 13 million personal names of voters in 2022 and 2023 datasets. The goal was to identify 1) the scope of changes in the register, 2) the potential patterns of changes in the frequencies of personal names in Belgrade and the rest of Serbia's voter registries, indicating voter migration, and 3) the connections between estimated voter migrations and the votes for the ruling party.

	2022	2023
Belgrade	1,597,120	1,608,351
Serbia other	4,906,761	4,904,777
Total	6,503,881	6,513,128

#### *The scope of changes in the register*

**The number of changes in name patterns indicates a potentially wide margin of changes in the voter register between two election days, which for now calls for a closer examination.** The number of voters in Belgrade in the online voter register excerpts has increased by only 16,214 since 2022. However, the analysis of personal name frequencies in the voter register excerpts shows an 80,301 increase of specific personal names in Belgrade and a 69,070 decrease. These should be understood as aggregations of at least four distinct factors: 1) demographic changes,

<sup>10</sup>Datasets used for the analysis: 1) Concluded voter register for 2023 Elections for the Members of the Parliament from December 2, 2023 with total of 6,509,108 voters; 2) Final voters registry for 2023 Elections for the Members of the Parliament from December 14, 2023 with total of 6,513,128; 3) Concluded voters registry for 2023 Elections for City Councilors (Belgrade municipalities) from December 5, 2023 with total of 1,613,190 voters; 4) Final voters registry for 2023 Elections for City Councilors (Belgrade municipalities) from December 14, 2023 with total of 1,613,334 voters; 5) Final voters registry for 2022 Elections for the Members of the Parliament from December 3, 2023 with total of 6,503,881; 6) Final voters registry for 2022 Elections for Belgrade City Councilors from December 15, 2023 with total of 1,600,434 voters. Source: Ministry of Public Administration and Local Self-Government voters registry page: <https://upit.birackispisak.gov.rs/PretragaBiraca>

2) name changes, 3) real migrations of voters, and 4) fictitious migrations of voters. Due to a wide range of factors that could affect these changes and the absence of reliable data, there is no estimation of the potential number of fictitious voter migrations at this stage. Instead, this analysis will be done at the municipal level, using data currently being collected. However, such wide margins of changes in the register in only 20 months between the two electoral cycles call for serious consideration of the claims that the changes in the register caused by fictitious migrations could be in the range of tens of thousands.

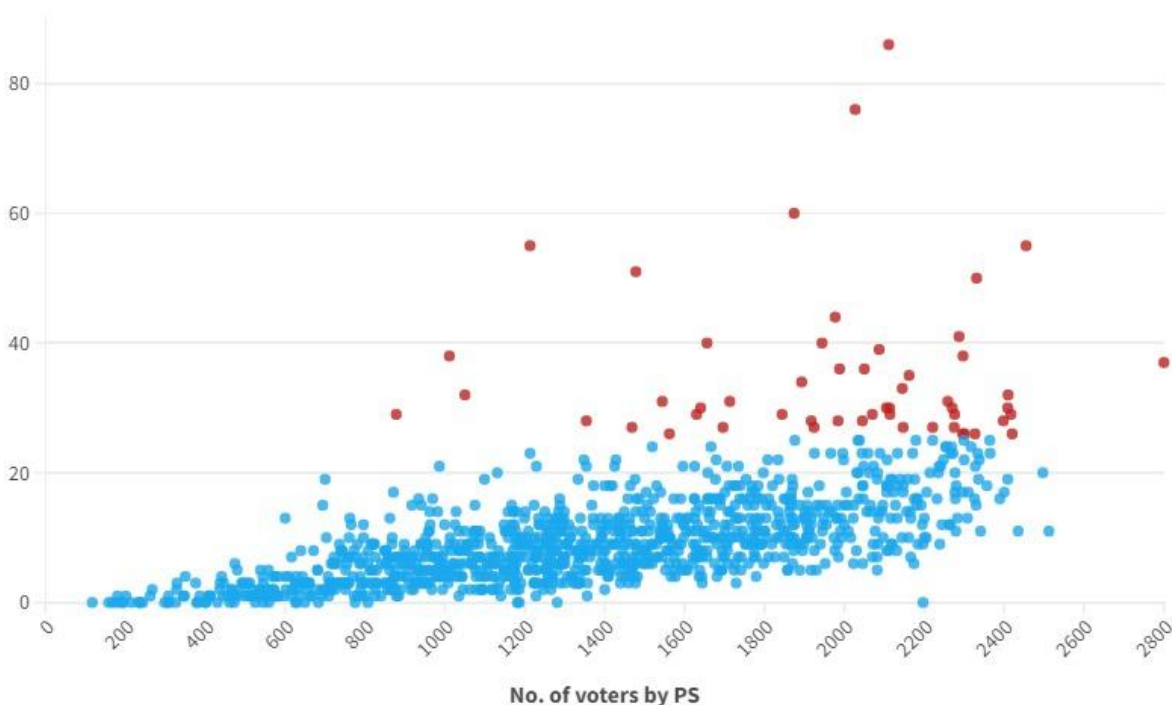
#### *Potential patterns of voter migration*

**To solve the problem of having no unique identifiers, rare personal names were used to approximate them. Using rare names as markers increases the probability of identifying voters who moved to Belgrade.** This database included personal names in Belgrade that were not in the voters' register in 2022 and appeared only once in 2023, and that decreased in the rest of Serbia by -1. There were 11,858 of these rare personal names in Belgrade that do not represent the scope of migration to Belgrade but rather help identify the potential patterns. Out of the 1,180 polling stations in Belgrade, three were excluded due to incomplete voting results, and another 10 (all in Zemun) were excluded because they were new in the 2023 elections. This left 1,167 polling stations for analysis.

**It was possible to identify the polling stations in Belgrade with surprisingly high frequencies of these markers, indicating potentially large organized migrations of voters.** In statistical terms, 95% of data points typically fall within a range defined by the average value plus or minus two times the standard deviation (a measure of variation). Here, the average number of individuals with rare names at each polling station was 10.1, with a slightly adjusted average (trimmed mean) of 9.5. The standard deviation was 8.2. Out of 1,167 polling stations, 53 showed a significant deviation from this average (two standard deviations from the mean), with the number of rare names ranging from 26 to 86 at each polling station, which was unusual.

Group ● + 2 SD from mean ● Closer to mean

Rare names frequency



**The distribution of these 53 outlier polling stations shows strong geographic clustering in just a handful of Belgrade municipalities, indicating potential coordination of voter migration at the municipal level.** Significant deviations were registered in polling stations in ten out of 17 Belgrade municipalities (Zvezdara, Voždovac, Novi Beograd, Palilula, Vračar, Savski Venac, Zemun, Rakovica, Grocka and Čukarica), and were completely absent from seven. Most affected were large municipalities Zvezdara and Voždovac, where more than half of the affected polling stations were found.

No. of targeted PS in municipality	+ 2 SD from mean	+ 1 SD from mean	< +1 SD from mean	< -1 SD from mean	-1 SD from mean
Zvezdara	15	26	25	23	0
Voždovac	14	19	29	27	0
Novi Beograd	7	10	28	92	3
Palilula	5	15	44	38	2
Vračar	3	4	17	39	0
Savski Venac	3	1	9	21	1

Zemun	2	7	47	50	0
Rakovica	2	1	11	49	9
Grocka	1	5	12	17	5
Čukarica	1	2	34	63	7
Surčin	0	6	5	15	1
Stari Grad	0	2	14	38	2
Obrenovac	0	1	2	37	15
Mladenovac	0	1	0	30	28
Lazarevac	0	0	3	28	33
Barajevo	0	0	1	16	11
Sopot	0	0	0	14	19

*Relationship between voter migration and electoral results*

**In examining why these polling stations could have been targeted for organized voter migration, the results from the previous elections seem to determine quite well the pattern, indicating intent to improve electoral results at certain groups of polling stations.** This, in turn, may be driven by a “quota” system determined by higher party levels and executed by locals. Namely, potential voters’ migration occurred more in municipalities and polling stations where the Serbian Progressive Party had less favorable election results in 2022. Because of this, predominantly urban municipalities were more affected by potential voters’ migration than those that were more rural, such as Obrenovac, Mladenovac, Lazarevac, Barajevo and Sopot.

Polling stations by the frequency of rare names	SNS rating in 2022 elections
+2 SD from mean	31.0
+1 SD from mean	35.3
< +1 SD from mean	37.3
< -1 SD from mean	38.5
-1 SD from mean	49.1

**Comparing the indications of organized voter migration to the results of the Serbian Progressive Party at the polling stations offers another evidence of the connection between the means and the motive.** The polling stations were categorized into groups based on their standard deviation values: 0-2, 3-10, 11-17, 18-25 and 26 or more. An ANOVA test, a type of statistical analysis, found significant differences between these groups in the number of votes for the Serbian Progressive Party on December 17. Polling stations with more voters who might

have migrated to Belgrade after 2022 tended to have more votes for the Serbian Progressive Party in 2023.

**Additionally, focusing on the 53 polling stations with the highest likelihood of voter migration, the analysis pointed to a notable increase in votes for the Serbian Progressive Party in 2023 compared to 2022.** Adjusting for the overall change in voter numbers, there were 920 more votes for the Serbian Progressive Party in these polling stations in 2023. On the other hand, in polling stations with little to no change in the rare name frequency, a decrease in votes for the Serbian Progressive Party was observed (436 fewer votes, or 81 fewer when adjusted for voter number changes).

**The analysis was further extended to compare the results for the Serbian Progressive Party at the polling stations with the highest probability of voters' migrations to their results in similar neighboring polling stations.** This other group of polling stations was from the same local territorial community (mesna zajednica) and had a similar number of voters, but without a high probability of voters' migration. In some cases, the difference was as high as 10 percent point, for example, Voždovac's local community 'Vojvode Mišića' or Zvezdara's local community 'Zeleno brdo.'

## 5. External validation

**Several political actors involved in the electoral process in Serbia explicitly either confirmed or justified the practice of voter migration, providing external validation to these claims and observations.** Politicians currently or formerly associated with the ruling party in Serbia raised suspicion or accused other parties of migrating voters between municipalities in Serbia. Also, several officials from Bosnia and Herzegovina publicly announced voting in Serbia on Election Day. This practice was criticized by opposition parties in Serbia, which prompted the highest Serbian government and Progressive Party officials to justify the migration of voters on Election Day. Finally, the international observers, primarily OSCE/ODIHR, noted this practice and pointed out that the longstanding recommendations to conduct a full audit of the voter register have not been implemented.

### *Inter-municipal voter migration*

**Before and after the elections, several politicians currently or formerly associated with the ruling party in Serbia anticipated organized migration of voters or accused other parties of it.** Milan Stamatović, president of the municipality of Čajetina, and party leader of "Healthy Srbija" in coalition with the Serbian Progressive Party, explained on October 24:

*"SNS, considering its position, can shift a significant portion of voters in Čajetina and thereby win. It's entirely legitimate that today some people you have, secure voters perhaps from Užice or elsewhere, can be shifted to Čajetina, and even with the solid support of your citizens, you might lose with some people who have come from elsewhere."<sup>11</sup>*

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<sup>11</sup>Stamatović o ulasku u Pokret za državu: Svestan sam da prebacivanjem sigurnih glasova mogu da izgubim u Čajetini <https://n1info.rs/vesti/stamatovic-o-ulasku-u-pokret-za-drzavu-svestan-sam-da-prebacivanjem-sigurnih-glasova-mogu-da-izgubim-u-cajetini/>

On November 8, Zorana Mihajlović, former government minister and Vice-President of the Serbian Progressive Party, warned:

*"There are tens of thousands of people transferring their residences to fictional addresses in Belgrade."*<sup>12</sup>

Dragan Stevanović, Vice-President of the Executive Board of the Serbian Progressive Party and the coordinator for the three southern districts of Jablanica, Pčinja and Toplica, accused the ruling Socialist Party of Serbia in the municipality of Surdulica of voter migration, explaining the bad results of his party in this municipality on December 18:

*"I remind you that hundreds of people were brought to Surdulica, enrolled in the voter registry to improve the results for the SPS (Socialist Party of Serbia). ... What was happening today on Election Day in Surdulica resembled everything but an electoral process..."*<sup>13</sup>

#### *Bosnian officials voting in Serbia*

**Several officials and politicians from Bosnia and Herzegovina voted in cities in Serbia and shared pictures on social media.** Nenad Nešić, Minister of Security of Bosnia and Herzegovina; Milovan Bjelica, Mayor of Sokolac Municipality in Bosnia and Herzegovina; and Jelena Trivić, President of the People's Front, a political party in Bosnia and Herzegovina, shared photos of voting in elections in Novi Sad, and Vračar and Zemun municipalities in Belgrade, respectively. All three officials and politicians from Bosnia and Herzegovina quoted the "Serbia Must Not Stop" slogans in their messages, which is the name of the ruling party list at the elections.<sup>14</sup>

#### *Serbian officials' justifications*

**After the Election Day, the highest government officials and the Serbian Progressive Party members shifted the attention to the voting of citizens from Bosnia and Herzegovina in Serbia and justified the practice.** This was done by Aleksandar Vučić, President of Serbia (17, 18, 20 Dec.), Prime Minister Ana Brnabić (17, 19 Dec.), Defence Minister and President of the Serbian Progressive Party Miloš Vučević (19 Dec.), Speaker of the National Assembly Vladimir Orlić (20, 21 Dec.), Vice President of the Main Board of the Serbian Progressive Party and MP Milenko Jovanov (17 Dec.) and Mayor of Belgrade and Vice President of the Main Board of the Serbian Progressive Party Aleksandar Šapić (21 Dec.).

**The highest officials explicitly justified the practice of voters traveling to Serbia to vote and the organized element of voter migration:**

*"Well, it's not a criminal offense to drive someone or not. Today, we had, I don't know how many cars were available for anyone who needed them, any mother, grandmother, aunt... We helped everyone to get to the elections. That's the job of a political party participating in the elections."* (Aleksandar Vučić, December 17)<sup>15</sup>

<sup>12</sup>Zorana Mihajlović najavila da Uvek za Srbiju neće učestvovati na izborima 17. decembra: Spremamo se za glasanje na proleće <https://www.danas.rs/vesti/politika/izbori-2023/zorana-mihajlovic-izbori-prolece/>

<sup>13</sup> Statement on SNS Surdulica official profile, Instagram, [https://www.instagram.com/reel/C0-agXUKpBO/?utm\\_source=ig\\_web\\_copy\\_link&igshid=MzRIQDBiNWEiZA%3D%3D](https://www.instagram.com/reel/C0-agXUKpBO/?utm_source=ig_web_copy_link&igshid=MzRIQDBiNWEiZA%3D%3D)

<sup>14</sup>Nenad Nešić's statement, official profile, X and Facebook [https://x.com/Nesic\\_Nenad\\_/status/1736385327491620894?s=20](https://x.com/Nesic_Nenad_/status/1736385327491620894?s=20) <https://www.facebook.com/milovanbjelicads/>

<sup>15</sup>Aleksandar Vučić's statement on election night, 17 December 2023 <https://youtu.be/40QG0CvoHfQ>



*"What's irregular/unlawful here - our citizens, registered in the voter register (showing no deviation from previous elections), come organized and vote in places where the opposition has 80% of monitors + 5,600 international observers." (Ana Brnabić, December 17)<sup>16</sup>*

*"They have the right to vote, I am talking about the citizens of Kosovo and Metohija undoubtedly, and those who have dual citizenship from Republika Srpska have the right to vote, and that is allowed by the law enacted by those who are now criticizing." (Miloš Vučević, December 19)<sup>17</sup>*

*"Serbs from Republika Srpska and from Kosovo and Metohija, who came to vote in their country in accordance with the law." (Milenko Jovanov, December 17)<sup>18</sup>*

#### *Reactions of international observers*

**International election observers, primarily OSCE/ODIHR, noted the organized migration of voters in both the campaign and Election Day assessments.** In the pre-election period, the ODIHR mission noted, "allegations that numerous persons deceased, including abroad, remained in the register, along with claims of voter migration in connection with local elections, diminished trust in its accuracy."<sup>19</sup> After the Election Day, ODIHR noted: "frequent allegations of organizing and busing of voters to support the ruling party in local elections". At the same time, it observed "instances of serious irregularities, including vote-buying and ballot box stuffing". It also noted that the longstanding ODIHR and Venice Commission recommendation to conduct a full audit of the voting register had not been implemented.

## 6. Conclusion and Recommendations

Based on the evidence collected so far, CRTA Election Observation Mission has a reasonable doubt that an organized migration of voters happened at the December 17 elections at such a scale that it affected the outcome of otherwise very close Belgrade Assembly elections.

Based on the overall findings of the electoral campaign and Election Day, CRTA identified that the drastic abuses of voters' rights, laws, and institutions escalated on Election Day. CRTA brought attention to serious concerns regarding the quality of National Assembly elections and their further departure from standards for free and fair elections. However, considering the scope and diversity of electoral abuses in Belgrade, which included organized voter migrations, CRTA concluded that the results of the Belgrade elections do not reflect the freely expressed will of voters living in Belgrade.

The reason for publishing this preliminary report on organized voter registration focusing on Belgrade was a public demand for objective and systematic information about this issue. CRTA conclusions about organized voter migration are just one of the several elements constituting CRTA's overall assessment of the 2023 National Assembly and Belgrade Assembly elections. CRTA's final election report will include a broader and more detailed analysis of these elements.

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<sup>16</sup>Ana Brnabić's statement, official profile, X <https://twitter.com/anabrnic/status/1736397465283142098>

<sup>17</sup>Vučević se izvinio građanima Republike Srpske zbog uvreda autošovinista: Uvek ste dobrodošli!  
<https://informer.rs/izbori-2023/vesti/857828/milos-vucevic-sns-izbori-republika-srpska>

<sup>18</sup> <https://twitter.com/MilenkoJovanov/status/1736422206437994953>

<sup>19</sup> [https://www.osce.org/files/f/documents/6/8/560650\\_1.pdf](https://www.osce.org/files/f/documents/6/8/560650_1.pdf)



As a civil society organization, CRTA does not have investigative powers and cannot collect evidence that competent authorities could. Therefore, CRTA aims to raise the alarm about this occurrence and motivate stakeholders to address this problem well ahead of the next elections. The track record of authorities processing electoral irregularities that CRTA identified in previous electoral cycles is lacking. With each new electoral cycle in which misdoings are not sanctioned, the quality of the next elections suffers even more. This vicious cycle needs to be broken.

As an observation mission, CRTA covered the elections for the National Assembly and the Belgrade city elections. However, CRTA's conclusions about electoral irregularities and organized voter migration could be extrapolated to all local elections. CRTA has reasons to believe and second-hand evidence of similar occurrences happening elsewhere. With regular local elections scheduled in less than six months, there is little time to address all issues raised by the CRTA Election Observation Mission and international observers.

If these issues remain unaddressed, CRTA fears that local elections in Serbia will stop being meaningful democratic exercises, which will deepen the country's institutional crisis. Drawing from experiences from the countries in the region, from Budapest to Sarajevo, Podgorica and Istanbul, elections in the largest cities have significant political weight and can become critical junctures in the political development of a country. Disabling these processes through unfair practices will only cause more crises, not solve them.

### *Recommendations*

#### *Short-term*

**To ensure greater transparency of the voter register, the Ministry of State Administration and Local Self-Government should make it fully public.** A compromise could be made to protect voters' personal data so that the number of voters per household or the initials of each household member is published.

**To prevent the repetition of this phenomenon, the Prosecution should objectively look into allegations of criminal acts during the elections.** These should include acts related to abuse of official functions, negligent conduct, and the inaccurate preparation of the voter register. It should also investigate recorded cases of pressure on voters and suspicions regarding the misuse of citizens' personal data and inform the public of the proceedings.

#### *Mid-term*

**To determine the adequacy of the voter register, the Ministry of State Administration and Local Self-Government should proceed with its independent audit.** This should be done following the recommendations of the ODIHR Mission and international standards.

**The National Assembly should amend the Law on Local Elections to disincentivize organized voter migrations.** This could be done by limiting the right to vote in local elections by a residence requirement of a minimum of 6 months, but not longer than that, in line with international standards.