

EXAMINING KOSOVO'S VULNERABILITIES REGARDING MALIGN FOREIGN INFLUENCE AND KLEPTOCRACY

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EXECUTIVE SUMMARY

The goal of this paper is to analyze the factors that create vulnerabilities in Kosovo to malign foreign influence and kleptocracy, by focusing on the finances of political parties, beneficial ownership and media organizations, as well as analyzing the blind-spots and weaknesses in Kosovo's legal and policy frameworks pertaining to these three sectors. This paper serves as an early warning report to the public institutions of Kosovo on how malign foreign, state, and non-state actors can influence Kosovo or shape developments within the country, by utilizing the lack of adequate legal and policy frameworks, as well as capacity gaps in the public institutions.

This paper holds that the lack of an adequate legal framework combined with weak institutional capacities to monitor the finances of political parties and beneficial ownership, as well as the unclear media ownership, constitute major sources of vulnerability to malign foreign influence and kleptocracy. Additionally, Kosovo remains vulnerable to foreign exploitation due to the lack of awareness and capacities among civil society organizations, particularly in the area of beneficial ownership.

Political party finances in Kosovo have been examined predominantly through the lens of anti-corruption strategies. Therefore, legal and policy revisions have been aimed at reducing the risk of corruption by increasing transparency, however, this has been done with a limited understanding of the risks of malign foreign influence. There is widespread complacency in Kosovo with respect to foreign funding for political parties.

Weak capacities among public institutions with respect to securing political party finances are an important source of vulnerability in Kosovo in terms of foreign malign influence and kleptocracy. For instance, the main oversight mechanism of political party finances is the Office for Registration, Certification, and Financial Control of Political Entities (the Office) at the Central Election Commission (CEC), however, this institution is not adequately staffed to effectively implement its mandate. The sources of candidate campaign financing are not sufficiently vetted by current legislation. This

includes donations and in-kind contributions such as the free organization of political events, advertising space, and other campaign materials. Third-party sponsorship of electoral campaigns also raises important questions regarding the potential links between donors, political parties, and candidates running for office.

In terms of funding, Kosovar media outlets are neither sustainable nor transparent. Even more problematic is tracing the ownership structures of online media outlets which are increasingly being taken over by big companies and corporations. There is a prevalent tendency for the media to conceal their ownership, or even declare nominal owners to cover for the real ones.

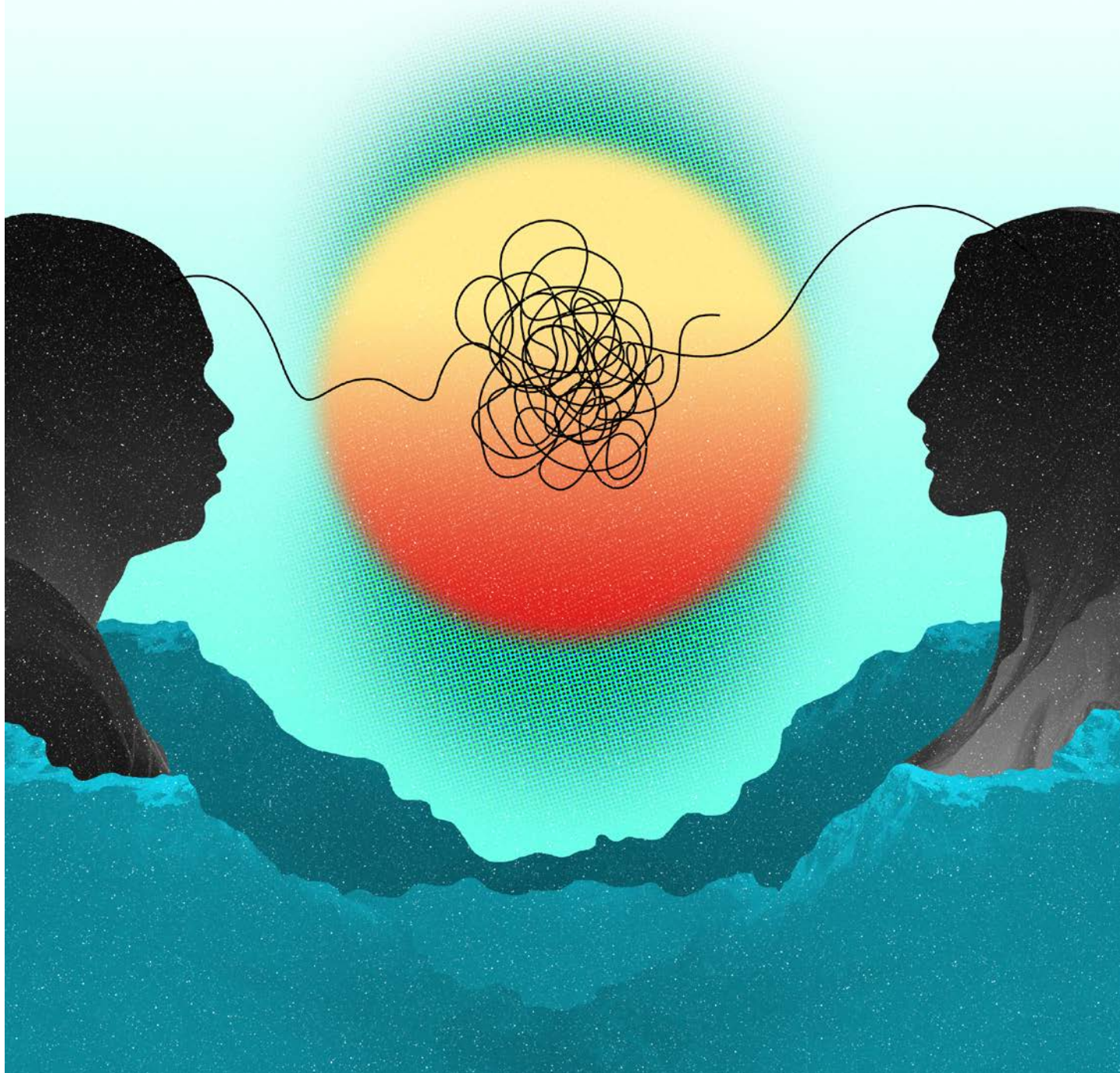
According to the latest public opinion polls, political parties and media outlets are among the least trusted institutions in the country. According to the latest Western Balkans Security Barometer (WBSB) report, the media and political parties are viewed as corrupt and untrustworthy, with only 23% and 12% of survey respondents stating that they have trust in these institutions, respectively.

The disinformation pandemic that followed Russia's invasion of Ukraine spread throughout the Western Balkans and Kosovo was not an exception. The Kosovo media landscape was permeated by information disorders and distorted narratives from Serbia and Russia. Since the beginning of the Russian invasion, online media portals in Kosovo published and re-published countless unverified articles from unreliable sources. The lack of financial and ownership transparency of the media sector in Kosovo makes it hard, if not impossible, to determine who is behind this stream of fake news and disinformation.

Along with its benefits, the expansion of online and social media in Kosovo has brought challenges, especially in a country where media literacy is weak and there are no mechanisms to mitigate the threat of fake news and disinformation. Advertising opportunities on social media platforms are also increasingly being used to spread disinformation among the population, not least due to their affordability. With a limited amount of funds, one can reach the entire Kosovar population by exposing them to an online advertisement.

Financial institutions such as banks play an important role when it comes to beneficial ownership, since ownership information is generally held by them. According to the 2018 Council of Europe Assessment Report on Kosovo's Conformity with International Standards for

Countering Money Laundering and Financing of Terrorism, banks and financial institutions in Kosovo are aware of their duty to obtain and maintain precise and current data on the beneficial ownership of legal entities.



BACKGROUND

This section provides an overview of the legal and policy frameworks pertaining to finances of political parties, beneficial ownership, and ownership of media organizations. The section also discusses legislation and analyzes some of the shortcomings within the existing framework on these issues.

The financing of political parties and electoral campaigns in Kosovo is regulated by the Law on Financing of Political Parties approved in 2010, which regulates the conditions and means of financing of political parties, their administrative matters, transparency, and the reporting of party expenses and income.¹ Accordingly, the funding for political parties in Kosovo is divided into public and private sources. Public funding refers to the financial grants that political parties in Kosovo receive from the national budget which is estimated to be around €5 million annually. Public funding is implemented through the Fund for Support of Political Parties (a public fund), which is managed by the CEC.² Only political parties that pass the threshold of 5 percent in the national elections and manage to secure seats in the Kosovo Assembly are eligible to receive money from the public fund. The amount of money that each party receives is calculated based on the number of seats the party has in the Kosovo Assembly. The money that the parties receive from the public fund can be used for overall running costs of the political party, as well as election campaigns.

In addition to public funding, political parties can receive funds from private sources, either in cash or in the form of services. The Kosovo legislation on political party funding also sets a limit on the amount of funds and donations a party can receive from natural or legal persons. Contributions from natural persons are limited to €2,000, while contributions from legal

entities are limited to €10,000 annually.³ In 2022, the law was amended and supplemented to include a ban on anonymous funding.⁴ The punitive provisions against political entities that address the failure to comply with the new legislation is a contested issue and largely reflected in the varied fine amounts throughout the past year. Whereas the earliest version of the law imposed a maximum fine of €10,000, the 2013 version of the amended law increased the maximum fine to €50,000. The fine was then decreased again to a maximum of €40,000 in the most recent version of the law.⁵

Despite the toughening of punitive measures against political parties in the revised version of the law on the financing of political parties, criticism has nevertheless persisted. Officials from the Office have argued that by setting the maximum fine at only €40,000 euros, the importance and essence of fines is ultimately damaged, particularly in cases whereby the violation of illicit acceptance of resources or contributions exceeds the value of the fine itself.⁶ The transfer of the responsibility of financial oversight and control from the Kosovo Assembly to the CEC in 2022 under amendments to the law on financing of political parties was a positive development in improving independent decision-making processes; this is particularly true regarding the levying of fines on political parties and the selection of auditors for the annual financial reports.⁷

Strict legal frameworks on political party funding are major components of addressing vulnerabilities to kleptocracy and malign foreign influence, and their effective implementation is vital. However, Kosovo faces serious challenges in this regard. The financing of local and central level election campaigns is regulated by the Law on General Elections, which, inter alia sets out campaign spending limits and financial disclosure obligations for political parties as well as sanctions and fines imposed for violating the law's provisions.⁸ Political parties are obliged to keep financial records and compile a report consisting of every expenditure made during

1 Law No. 03/L-174 On Financing Political Parties (2010). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2705>

2 Law No. 03/L-174

3 See article 5 of the Law No. 03/L-174 on financing of political parties

4 See Law No. 08/L-122 on amending and supplementing the law No. 03/L-174

5 See Law No. 08/L-122 on amending and supplementing the law No. 03/L-174

6 Senior official from the Office for Political Parties Registration and Certification. (2022, November 30). Personal Interview.

7 See Law No. 08/L-122 on amending and supplementing the law No. 03/L-174

8 Law No. 03/L-073 On General Elections In The Republic Of Kosovo (2008). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2544>

the election campaign, which is to cover the period of 45 days before and after the campaign period. The financial reports are received by the Office, which operates under the CEC, before certified auditors conduct their work and the CEC publishes the report on its official website⁹.

Having discussed the legal framework for finances of political parties, the next area of focus is the ownership of media organizations in Kosovo. Media organizations are particularly relevant in the context of malign foreign influence in Kosovo as they are a potent tool that can shape public opinion. Kosovo benefits from a diverse media landscape, which encompasses traditional, online outlets, and social media. The latter two have been subject to a significant increase in usage by the population, given Kosovo's high level of internet penetration.

Media ownership and finances constitute crucial elements of media development in Kosovo. However, the legal vacuum, on the one hand, and the unreliability and ambiguity of the information available on the other, have contributed to a financially non-transparent and unregulated media market. The current set of laws that regulate the way both traditional and online media outlets function in Kosovo is rather limited, as it does not contain legal provisions for media financing and ownership structures.¹⁰ The two media regulatory institutions are the Independent Media Commission (IMC) and the Press Council of Kosovo (PCK). The PCK is a self-regulated body established and run by the news sector in Kosovo, whereas the IMC was founded as an independent body as part of Article 141 of the Constitution of Kosovo to regulate, manage, and oversee the broadcasting frequency spectrum in the country.¹¹ Given that the PCK is a self-regulating institution that does not have the power to license or register news outlets, it does not have any executive competencies. The IMC, on the other hand,

does have these competencies, which are enshrined in the Law on the Independent Media Commission. However, the IMC's powers over online video-disseminating platforms and its ability to make public the ownership and finance structures of the media entities it oversees are limited.

Beneficial ownership is an especially important issue in the context of malign foreign influence. While it is well understood in Kosovo, there are challenges with capacities and regulatory frameworks. In a 2018 summit in London, part of the Berlin Process, the six Western Balkan countries made pledges to combat corruption and abide by the law of the European Union (EU).¹² Kosovo made 23 anti-corruption pledges, which are centered around three main points: exposing corruption, punishing corruption, and rooting out the culture of corruption in public institutions.¹³ Since then, Kosovo has made gradual progress. For instance, in the Transparency International Corruption Perceptions Index for 2022, Kosovo scored 41 points, where zero marked the highest level of corruption and 100 is a society without corruption.¹⁴ This upward trend in Kosovo's fight against corruption can, to a large extent, be attributed to improvements in Kosovo's anti-corruption legislation, which has been brought more closely in line with European standards.¹⁵ Nevertheless, law enforcement is still largely ineffective, while the lack of transparency and accountability in public institutions and political interference perpetuates the cycle of corruption in Kosovo.

Having outlined the context concerning this paper's three thematic areas of analysis, the next section discusses in more detail the factors that drive vulnerability in the respective areas. This paper outlines how the lack of proper policy or legal regulations, coupled with weak or lacking institutional capacities creates an opening for foreign malign influence and kleptocracy.

9 Spahija, F. and Dupak, J. (2020). Office for Oversight of Funding of Parties in Republic of Kosovo and Czech Republic. *Kosovo Democratic Institute and Transparency International Czech Republic*. <https://www.transparency.cz/wp-content/uploads/2021/02/Office-for-oversight-of-funding-of-parties-in-Republic-of-Kosovo-and-Czech-Republic.pdf>

10 National Democratic Institute. (2022). Information Integrity in Kosovo: Assessment of the Political Economy of Disinformation. <https://www.ndi.org/sites/default/files/Information%20Integrity%20in%20Kosovo%20-%20Assessment%20of%20the%20Political%20Economy%20of%20Disinformation.pdf>

11 About the IMC. (2023, February 1). *Independent Media Commission*. <https://www.kpm-ks.org/en/kpm/311/per-kpm/311>

12 Office of the Prime Minister. (2018). Country Commitments of the Government of Kosovo in the Field of Anti-Corruption. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/724309/Kosovo_Anti-Corruption_Pledges.pdf

13 Ugi Zvekic, U. and Roksandic, S. (2021). Infrastructure of Integrity: Western Balkans anti-corruption pledges monitor. *Global Initiative Against Transnational Organized Crime*. <https://globalinitiative.net/wp-content/uploads/2020/10/Infrastructure-of-integrity-34-GITOC.pdf>

14 *Corruption Perceptions Index – Kosovo*. (2023, January 7). *Transparency International*. <https://www.transparency.org/en/cpi/2022/index/ksv>

15 European Commission. (2022). *Commission Staff Working Document Kosovo* 2022 Report*. <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Kosovo%20Report%202022.pdf>

MAPPING VULNERABILITIES

Drawing on the issues outlined in the previous section, this paper seeks to answer the following research question: **What are the main sources of vulnerability in Kosovo to malign foreign influence and kleptocracy in the areas of political party finance, beneficial ownership, and the media?** This paper considers these three areas as the most exposed to malign foreign influence and kleptocracy in Kosovo, stemming from a combi-

nation of inadequate regulatory frameworks and weak capacities. This section highlights the blind spots and weakness in the current legal and policy frameworks in the context of the three thematic areas, showing where the vulnerabilities lie, which can be exploited by foreign state and non-state actors for influence, as well as facilitate kleptocracy.



POLITICAL PARTY FINANCING

Despite notable improvements in the legal framework, political party financing in Kosovo remains highly vulnerable to kleptocracy and malign foreign influence. Both domestic and international reports show the major shortcomings. An issue that has been raised by international organizations, including the EU Election Observation Mission, is the self-financing of candidates. The current law does not require individual candidates, including mayors, deputies, and municipal assembly members to report their expenditures. The latter are also not included in the financial reports of political parties, leaving individual candidate finances completely outside the scope of the law.¹⁶ Likewise, there is effectively no limit on the amount of funds a single candidate running for office can spend on his or her election campaign. This is problematic since the practice of financing one's own election campaign is widespread among candidates running for office in Kosovo. For instance, research by Kosovo think-tanks on the financial transparency of mayoral candidates in the 2021 local elections shows that "over 92% of the candidates stated that their own funds are a main source of funding their campaign, whether as a sole or partial source of funding". If not regulated properly, this is a particularly vulnerable area to foreign influence and kleptocracy.

Research by Kosovar think-tanks shows that the funding of political parties is not transparent and is prone to corruption. **Based on the examination of the existing research, there is a clear link and a transactional relation between the business community and the finances of political parties in Kosovo.** Businesses that fund political parties during election campaigns tend to be rewarded with public contracts if the parties

are in the assembly or government. In addition to this, the research shows that, despite some progress, Kosovo does not have adequate political party financing regulations that prevent malign foreign influence and kleptocratic practices. For instance, issues pertaining to transparency and financial accountability of political entities, such as candidate finances, digital and third-party campaigning, have been excluded from legislative amendments concerning political party finances.¹⁷

The lack of adequate regulations, with respect to political party financing in Kosovo allows questionable cash to flow into digital campaigning, fosters unchecked financing, and creates fertile ground for the spreading of disinformation and misinformation.¹⁸ New tools aimed at increasing transparency related to political advertising, such as Google's Transparency Report for Political Ads, are not available in Kosovo.¹⁹ According to the EU's Election Observation Mission in Kosovo (EU EOM), about one-third of campaign advertisements circulating on Facebook and Instagram during the 2021 local elections were sponsored by third parties.²⁰ Since third-party financing is frequently done under the guise of anonymity, it is difficult, if not impossible, to trace the individuals or groups behind these funds.

Third-party sponsorship of electoral campaigns also raises important questions about potential links between the donors, parties, and candidates running for office. Notably, during the last local elections in October 2021, third-party financing was predominantly directed towards digital advertisements aimed at discrediting opposition parties and candidates, which often involved spreading false and misleading information about them.²¹

16 European Union Election Observation Mission Kosovo. (2021). *Final Report on Local Elections: 17 October – 14 November 2021*. https://www.eeas.europa.eu/sites/default/files/final_report_2021_eom_kosovo_municipal_elections_-_albanian.pdf

17 Cakolli, E. (2022). *Political Financing in Kosovo: What After the Recent Legal Changes?* Kosova Democratic Institute. <https://kdi-kosova.org/wp-content/uploads/2022/12/47-Raport-Political-Financing-Kosovo-Eng-02.pdf>

18 Spahija, F. and Dupak, J. (2020). *Office for Oversight of Funding of Parties in Republic of Kosovo and Czech Republic*. Kosova Democratic Institute and Transparency International Czech Republic. <https://www.transparency.cz/wp-content/uploads/2021/02/Office-for-oversight-of-funding-of-parties-in-Republic-of-Kosovo-and-Czech-Republic.pdf>

19 Senior officials from the Office for Political Parties Registration and Certification. (2022, November 30). Personal Interview.

20 European Union Election Observation Mission in Kosovo. (2021). *Final Report for Municipal Elections 17 October – 14 November 2021*. https://www.eeas.europa.eu/sites/default/files/final_report_2021_eom_kosovo_municipal_elections_-_albanian.pdf.

21 European Union Election Observation Mission Kosovo. (2021). *Final Report on Local Elections: 17 October – 14 November 2021*. https://www.eeas.europa.eu/sites/default/files/final_report_2021_eom_kosovo_municipal_elections_-_albanian.pdf

Online political advertising has allowed parties and politicians to reach different groups of constituents at a relatively low cost, while also providing an attractive and effective platform for citizens to be more politically engaged.²² Given the high internet penetration rate and widespread social media use in Kosovo, political parties and their candidates have predominantly oriented their election campaigns to online platforms such as Facebook, Instagram, and Twitter. Civil society investigations found that 88% of the candidates that ran for office during the October 14, 2021 local elections used Facebook as the main platform for communicating with citizens.²³ Parties and candidates rely heavily on paid digital advertisements, as was the case during the October 14 elections, whereby candidates used digital advertisements on Facebook to promote their political programs while also using them to discredit competing candidates and parties.²⁴

Other sources of candidate campaign financing that are not sufficiently addressed by the current legislation include donations and non-financial contributions, such as the free organization of political events, advertising space, and other campaign materials.

Natural and legal persons offering in-kind contributions to parties are legally obliged under the current law to issue a statement declaring the purpose behind the contribution and the market value of the good or service offered. Similarly, every donation received by political parties must be accompanied by detailed information about the donor.²⁵ According to senior officials from the Office, the non-declaration of in-kind donations and contributions constitutes one of the biggest challenges to the transparency and accountability of political parties. Given the lack of declarations, such donations and contributions are hard, if not impossible, to monitor. This leaves plenty of room for political parties to mismanage, misuse, and abuse resources.²⁶ The lack of control mechanisms and sanctions for candidates



22 Spahija, F. and Dupak, J. (2020). Office for Oversight of Funding of Parties in Republic of Kosovo and Czech Republic. *Kosovo Democratic Institute and Transparency International Czech Republic*. <https://www.transparency.cz/wp-content/uploads/2021/02/Office-for-oversight-of-funding-of-parties-in-Republic-of-Kosovo-and-Czech-Republic.pdf>

23 Cakolli, E. and Haxhiu, A. (2021). Financial transparency of candidates for mayors in the 2021 local elections. *Kosovo Democratic Institute*. <https://kdi-kosova.org/wp-content/uploads/2021/11/59-Raporti-per-financat-e-kandidateve-per-kryetare-ENG-01.pdf>

24 European Commission. (2022). *Commission Staff Working Document Kosovo* 2022 Report*. <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Kosovo%20Report%202022.pdf>

25 Law No. 08/L-122 On Amending and Supplementing the Law No. 03/L-174 On Financing the Political Parties, Amended and Supplementing by the Law No. 04/L-058 And Law No. 04/L-122 and The Law No. 03/L-073 On General Elections In The Republic Of Kosovo, Amended And Supplementing By The Law No. 03/L-256. (2022). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=62600>

26 Senior official from the Office for Registration, Certification and Financial Control of Political Entities. (2022, November 30). Personal Interview.

that breach the law provide ample opportunities for individual candidates to engage in unethical activities, such as accepting illegal donations without fear of consequences. Insufficient staff capacities within the Office are a major obstacle to monitoring in-kind services.

Kosovo faces challenges in terms of digital and third-party campaigning, which arise from both policy-level issues and a lack of capacity within relevant institutions to effectively address this problem. This is also confirmed by Kosovar senior public officials interviewed for this paper who maintain that: "In-kind donations and the costs incurred for online campaigns are not declared by political parties. These are very important; however, we have no means to monitor such expenses. The new law on the Financing of Political Parties does not regulate expenses incurred online, which constitutes a loophole in the law, which is being exploited by political parties through the non-declaration of these expenses".²⁷ In other words, digital contributions and expenses for online campaigning are a major blind-spot for Kosovo's political party finances.

Kosovo's weak public institutional capacities with respect to political party finances are a source of vulnerability to foreign malign influence and kleptocracy. For instance, the Office, which is the main institution that oversees political party finances²⁸ is under-resourced and inadequately staffed. It is therefore unable to effectively implement its mandate, and more resources are needed. With limited staff and resources, it is highly unlikely that any changes in the existing legislation will be effectively implemented. One challenge, according to the senior officials from the Office, is the recruitment of auditors to review and verify the finances of political parties. While recent changes to the law have increased the budget for more auditors, officials from the Office are pessimistic.²⁹

A major factor that makes political party financing vulnerable to malign foreign influence is the lack

of adequate capacities of the oversight institutions to monitor in-kind contributions from the private sector (i.e., companies that can print posters or offer office space). Based on interviews conducted with officials from the Office, as well as public reactions from civil society organizations about political party finances, there should be a unit of inspectors in the Office dedicated to field visits and monitoring to ensure political party compliance with legal provisions concerning the disclosure of in-kind contributions. There is a serious problem in this context, as the Office's legislative recommendations regarding political party financing were not fully included or considered by the government. According to Office officials: "The CEC has provided a comprehensive list of comments to the drafting committee of the law, including the regulation of online campaigning by political parties. However, we have been excluded from the drafting process and our comments were overlooked."³⁰

Another factor that creates vulnerabilities for foreign malign influence and kleptocratic influence is that political parties fail to develop financial reports accessible to the public. The legal framework regulates financial reporting deadlines for political parties, whereby parties are legally obligated to submit annual financial statements and campaign finance reports by March 1 of each year and up to 45 days after the election.³¹ According to the legal framework, financial reports are only to be published after having gone through the auditing process. According to an official from the Office, lack of timely financial reporting by political parties is a recurring issue that makes it difficult for the Office to monitor parties' financial activities. The Office is legally obligated to carry out annual trainings for political party representatives on the proper completion of financial reports.

However, despite this requirement a senior official from this institution noted a lack of interest from parties in attending these training sessions.³² There are often cases where the auditing is done for three consecutive

27 Senior official from the Office for Registration, Certification and Financial Control of Political Entities. (2022, November 30). Personal Interview.

28 Read more about the Office for Registration, Certification and Financial Control of Political Entities: <https://kqz-ks.org/an/office-for-pprc/>

29 Senior official from the Office for Registration, Certification and Financial Control of Political Entities. (2022, November 30). Personal Interview.

30 Senior official from the Office for Registration, Certification and Financial Control of Political Entities. (2022, November 30). Personal Interview.

31 Law No. 08/L-122 On Amending and Supplementing The Law No. 03/L-174 On Financing The Political Parties, Amended And Supplemented By The Law No. 04/L-058 And Law No. 04/L-122 And The Law No. 03/L-073 On General Elections In The Republic Of Kosovo, Amended And Supplemented By The Law No. 03/L-256. (2022). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=62600>

32 Senior Officer at the Office for Political Parties Registration and Certification. (2022, November 30). Personal Interview.

years, which makes it difficult for the Office to trace funds and hold parties accountable. For instance, if an audit is conducted in 2022 on a party's financial reports from the year 2019, it might very well be that a company or media outlet with whom a political party has conducted transactions with no longer exists. What is even more striking is that TV and media outlets do not disclose any information to auditors regarding how much a party has paid for campaign advertisement with these outlets.

Banks are also seen as largely uncooperative in terms of sharing information with auditors about parties' financial transactions.³³ Whereas the law prohibits political entities to have more than one active bank account, the non-disclosure of information by banks

means that auditors are unable to establish whether parties have other, non-declared bank accounts through which they receive funds and donations.³⁴ Digital campaigns and other related online activities are not regulated by the current legal framework on political party financing and election campaigning in Kosovo, thus putting transparency and accountability at risk.

Officials from the Office noted that, for a long time, civil society organizations and media outlets in Kosovo paid little attention to the subject of political party financing. However, recently the issue has gained more attention, which, according to the senior officials from the Office, is a positive step towards promoting financial transparency among political parties.³⁵



33 Interviews with a number of senior public officials from oversight institutions.

34 Senior officials from the Office for Political Parties Registration and Certification. (2022, November 30). Personal Interview.

35 Ibid.

MEDIA OWNERSHIP TRANSPARENCY

When it comes to media ownership structures, there are a number of patterns that stand out, including hidden ownership and corporations owning media outlets.³⁶ Most media outlets in Kosovo, be they traditional or online, do not publish information about their ownership structures. There is a prevalent tendency for the media to conceal their ownership, or even declare nominal owners to cover for the real ones.³⁷ As existing research points out, most interviewed media representatives were reluctant to respond to questions about the ownership structures of their respective media outlet, including well-established national media organizations such as Klan Kosova, RTV 21, and KTV. These outlets either refused to answer or only partially answered questions relating to their ownership.³⁸

A particular challenge is tracing ownership structures of online media outlets which are increasingly being taken over by big companies or corporations. In some cases, these companies have no relation whatsoever to the media sector and have no interest in media development³⁹. Instead, they use online media channels to further their own business interests and the interests of those close to them. Corporate media ownership has raised questions over ethics and integrity of the respective media organizations.⁴⁰

In terms of funding, Kosovo media outlets are neither sustainable nor transparent. According to the European Commission's 2022 Kosovo Report, the media sector "remains heavily dependent on donors and advertising, including from the government and political parties", which leaves the sector vulnerable to business and political interests. In other words, when funding is limited, the media turns to entities with economic

and political power to provide favorable coverage, in exchange for funding. Lack of financial transparency impacts the advertising industry as well, whereby advertising prices declared by broadcasters do not represent real prices. That is, broadcasters offer a higher price to advertising agencies and a much lower price to business partners through direct negotiations.⁴¹

Along with its benefits, the expansion of online and social media in Kosovo has created challenges in a country where media literacy is weak and there is a lack of mechanisms to mitigate the threat of fake news and disinformation.⁴² According to the National Democratic Institute's (NDI) report on information integrity in Kosovo, online media and social media contributed to the spread of false information through the creation, falsification, and exaggeration of information without identifying it as such. Due to the lack of regulation, political entities have turned to Facebook groups to create and disseminate harsh language and hate speech against one another. The advertising features on social media platforms are also increasingly being used to spread disinformation among the population, not least due to its affordability.⁴³

The disinformation pandemic that followed Russia's invasion of Ukraine spread through the Western Balkans, and Kosovo was no exception, albeit with limited impact. Since the beginning of the Russian invasion, online media outlets in Kosovo have published and re-published countless unverified articles from unreliable sources.⁴⁴ This is an important indicator of the weak capacities of media organizations that lack internal protocols to prevent such reporting. Among other fake news, old images and videos from

36 Berisha, I. (2015). *Media Ownership and Finances in Kosovo: Legal Vacuum and Lack of Transparency*. South East European Media Observatory. https://mediaobservatory.net/sites/default/files/Media%20Ownership%20and%20Finances%20in%20Kosovo_0.pdf

37 Ibid.

38 Berisha, I. (2015).

39 Ibid.,

40 Berisha, I. (2015).

41 Berisha, I. (2015).

42 National Democratic Institute. (2022). *Information Integrity in Kosovo: Assessment of the Political Economy of Disinformation*. <https://www.ndi.org/sites/default/files/Information%20Integrity%20in%20Kosovo%20-%20Assessment%20of%20the%20Political%20Economy%20of%20Disinformation.pdf>

43 Ibid.

44 Fana, V. (2022, March 4). *Lufta me propagandë e lajme të rreme*. KALLXO. <https://kallxo.com/gjate/lufta-me-propagande-e-lajme-te-rreme/>

previous conflicts across the world were framed as though they had occurred during the Russian invasion. Other foreign actors have also left their footprint in Kosovo's media landscape, including China. Albeit not nearly as significant as Russia's influence, spill-over stories about Serbia's relation with China, the latter's non-recognition stance vis-à-vis Kosovo, and the wider regional importance of China are some of the topics through which China's presence in the country is manifested.⁴⁵

The unregulated funding of the media industry in Kosovo makes the country vulnerable to foreign malign influence, particularly the online media outlets.

Another troubling aspect of funding from foreign malign actors is that the targeted online media outlets may not be aware of the origin of this funding, especially if the money is being funneled through intermediaries or funding sources are undisclosed.

Regarding public trust in the Kosovo media, civil society investigations such as the cross-regional public opinion poll published in 2021 by the South East European Network for Professionalization of Media, reveal that the majority of Kosovo's citizens (64%) trust the media. Television remains the most trusted and reliable source of information (86%), followed by investigative media (70%), international media (60%), social media, (56%) and online media (52%).⁴⁶ Media professionals suggest that diminishing trust in political leaders and institutions,

coupled with corruption and abuse of power may be a contributing factor to the public's reliance on the media.⁴⁷ A more recent public opinion poll, however, indicates a notable decrease in the public's trust in the media. The 2022 WBSB poll finds the media as one of the least trusted institutions in Kosovo, with only 23% of citizens declaring trust or complete trust in Kosovar media. The figure is several percentage points lower compared to the survey conducted in 2021, whereby 28% of citizens declared trust in media.⁴⁸

Civil society investigations highlight that public trust in political parties in Kosovo is at an all-time low. According to the latest results from WBSB, an annual public survey conducted by the Kosovar Centre for Security Studies, political parties are perceived negatively by Kosovo citizens, with no more than 12% of survey respondents having trust in Kosovo's existing political parties.⁴⁹ Furthermore, WBSB data from the year 2021 indicate that the majority of citizens (50.8%) perceive political parties to be very corrupt⁵⁰, while 42.3% of respondents declared to have no trust at all in political parties.⁵¹ The National Survey of Kosovo for the period Feb-March 2023 by the International Republican Institute (IRI) also shows that 55% of the Kosovars distrust political parties, while around 50% strongly or somewhat disagree that political parties are doing enough to address the needs of the voters.⁵²



45 Shopov, V. (2020). 'Getting on the Radar': China's Rising Media Presence in South East Europe. Konrad-Adenauer-Stiftung. [https://bird.tools/wp-content/uploads/2020/12/"China's-Rising-Media-Presence-in-South-East-Europe".pdf](https://bird.tools/wp-content/uploads/2020/12/)

46 Ipsos Strategic Marketing. (2021). Trust in the Media – Kosovo. SEENPM. <https://seenpm.org/wp-content/uploads/2021/09/Trust-in-the-media-Kosovo-tehnic-al-report.pdf>

47 Mehmeti, J. (2021). IN MEDIA WE (DIS)TRUST: Mapping citizens' concerns over media in Kosovo. SEENPM, Peace Institute and Kosovo 2.0. <https://seenpm.org/wp-content/uploads/2021/05/Resilience-research-publication-3-Kosovo-English.pdf>

48 Avdiu, P. (2022). Public perception on trust, corruption, and integrity of public institutions in Kosovo. Kosovar Centre for Security Studies. https://qkss.org/images/uploads/files/WBSB_2022_Kosovo_Report_1_Dec_2022_ENG.pdf

49 Avdiu, P. (2022). Public perception on trust, corruption, and integrity of public institutions in Kosovo. Kosovar Centre for Security Studies. https://qkss.org/images/uploads/files/WBSB_2022_Kosovo_Report_1_Dec_2022_ENG.pdf

50 Western Balkans Security Barometer. (2021). Do you think that political parties are corrupt? <https://securitybarometer.qkss.org/te-dhenat>

51 Western Balkans Security Barometer. (2021). How much do you trust political parties? <https://securitybarometer.qkss.org/te-dhenat>

52 National Survey of Kosovo (2023, May 16). International Republican Institute (IRI). <https://www.iri.org/resources/national-survey-of-kosovo-feb-march-2023/>

BENEFICIAL OWNERSHIP

A crucial domain in the context of foreign influence and within the broader scope of anti-corruption efforts is the regulation of beneficial ownership to ensure transparency and accountability in the ownership and control of companies, trusts, and other legal entities. Beneficial ownership refers to the individuals or entities who ultimately own or control a company, trust, or asset, even if their names do not appear on the formal ownership records. In other words, beneficial ownership refers to the individuals or entities who ultimately enjoy the benefits of ownership, such as the ability to control the company, make decisions about its operations, or receive its profits.⁵³

In the context of Kosovo, beneficial ownership is a relatively new concept that is not fully understood by the general public, including public institutions. It is also an under-researched topic, which contributes to the overall lack of public awareness on the issue and its importance in safeguarding the integrity of financial systems and in the general fight against corruption and money laundering. Money laundering trends in Kosovo are often linked to the prevalent use of cash, which is frequently invested in lawful ventures like real estate, construction, extractive industries, and the petroleum industry. The inflow of criminally-generated funds from foreign sources into Kosovo, both through legal means such as remittances and informal channels, presents a significant risk, particularly in regard to organized crime tied to the diaspora community. The abuse of legal entities and arrangements, such as using straw men, establishing shell companies, and concealing true

ownership, are also becoming increasingly dangerous and threaten the stability of Kosovo's financial system.⁵⁴

Kosovo has laid out the preliminary legal framework for the identification of business owners registered in Kosovo through the Law on Business Organizations⁵⁵ and the Law on Prevention of Money Laundering and Combating the Financing of Terrorism.⁵⁶ Beneficial ownership is further regulated by the Central Bank of Kosovo's (CBK) Regulation on Prevention of Money Laundering and Financing of Terrorism⁵⁷, which sets specific criteria and procedures required for managing the process of prevention of money laundering and terrorist financing in compliance with the Law on the Prevention of Money Laundering and Combating Financing of Terrorism. The CBK has also issued the directive "Instruction on the Identification of Beneficial Owners" that provides guidance to financial institutions on meeting client due diligence requirements related to identifying the beneficial owners of a company. In July 2021, the Financial Intelligence Unit approved the Administrative Instruction on the "Beneficial Owner for Reporting Entities,"⁵⁸ which sets measures to be taken by reporting entities to implement the requirements for the identification of beneficial owners. Despite the legislative advancements on beneficial ownership, the process of identifying beneficial owners is hindered by challenges in law enforcement and difficulties in obtaining accurate, current information regarding the owners of businesses and other legal entities.⁵⁹

The legal framework requires all legal persons to be registered in the Business Registry and for basic register

53 Valencia, C. (2021). Understanding Beneficial Ownership and Legal Arrangements for Combatting Money Laundering. *United Nations Development Programme*. <https://www.undp.org/kosovo/publications/understanding-beneficial-ownership-and-legal-arrangements-combatting-money-laundering>

54 Council of Europe, Project against Economic Crime in Kosovo* (PECK II). (2018). *Assessment Report on compliance of Kosovo with international anti-money laundering and combating the financing of terrorism standards*. <https://rm.coe.int/assessment-report-on-compliance-of-kosovo-with-international-anti-money/16809381e1>

55 Law No. 06/L-016 on Business Organizations. <https://qzk.rks-gov.net/ActDocumentDetail.aspx?ActID=16426>

56 Law No. 03/L-196 on the Prevention of Money Laundering and Terrorist Financing. <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806dc661>

57 Central Bank of the Republic of Kosovo. (2016). Regulation on Prevention of Money Laundering and Financing of Terrorism. https://bqk-kos.org/repository/docs/korniza_ligjore/english/11-BQK%20-%20ENG%20-%20Rregullorja%20per%20parandalimin%20e%20pastrimit%20te%20parave.pdf

58 Administrative Instruction Nr. 15/2010 on Implementation of Law Number 03/L-222 on Tax Administration and Procedures. https://www.atk-ks.org/wp-content/uploads/2019/06/UDHEZIMI_ADMINISTRATIV_Nr_15_2010_A.pdf

59 Ministry of Industry, Entrepreneurship and Trade. (2021). Concept Document for the Register of Beneficial Owners. <https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41267>



information to be made available to the public.⁶⁰

However, there is no mechanism to verify the information that is provided to the Business Registry or to check whether the information requires updating.

While legal persons have a legal obligation to notify the Registry of any changes in their basic information, the lack of penalties in cases of non-compliance frequently result in the non-declaration of changes. While to this day the Registry has not identified any issues with respect to the adequacy, accuracy, or currency of the information it holds, in the absence of verification mechanisms and penalties, this information cannot be considered fully reliable.

Financial institutions such as banks play an important role when it comes to the fight against corruption and money laundering. According to the senior officials from Kosovo's Financial Intelligence Unit, banks carry vulnerability due to their high volume of transactions and vast financial resources, making them a prime target for corrupt individuals looking to launder illicit funds

into the sector.⁶¹ Banks are also crucial when it comes to beneficial ownership, since ownership information is generally held by them. According to the 2018 Council of Europe (CoE) Assessment Report on Kosovo's Conformity with International Standards for Countering Money Laundering and Financing of Terrorism, banks and financial institutions in Kosovo are aware of their duty to obtain and maintain precise and current data on the beneficial ownership of legal entities. Additionally, the report conveyed minimal reassurance regarding the process of obtaining and verifying beneficial ownership information for corporate customers incorporated in foreign jurisdictions. Banks often rely on customer declarations to verify information, which raises concerns regarding the accuracy of the information provided.⁶²

According to senior officials from Kosovo's Financial Intelligence Unit, there are limited capacities to extract ownership information when it comes to legal persons in foreign jurisdictions.⁶³ **When investments are made through entities incorporated outside of Kosovo, the**

⁶⁰ Council of Europe, Project against Economic Crime in Kosovo* (PECK II). (2018). *Assessment Report on compliance of Kosovo with international anti-money laundering and combating the financing of terrorism standards*. <https://rm.coe.int/assessment-report-on-compliance-of-kosovo-with-international-anti-mone/16809381e1>

⁶¹ Personal interview with senior official from the Financial Intelligence Unit. (2022, November 2).

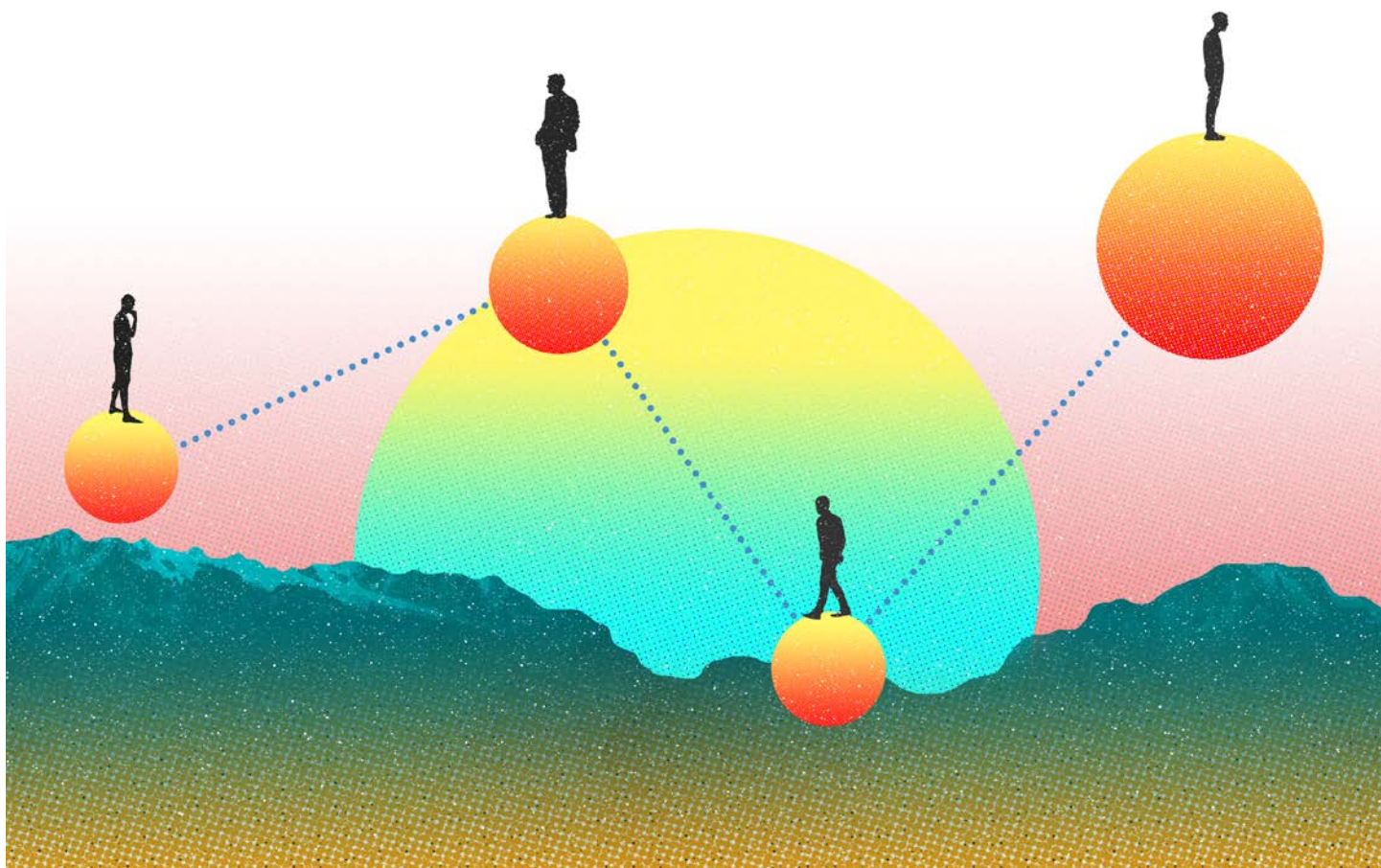
⁶² Ibid.

⁶³ Personal interview with senior official from the Financial Intelligence Unit. (2022, November 2).

Business Registry has no knowledge of the ultimate ownership of that entity. In this case, reliance must be placed on reporting entities that may be providing services to the legal person.⁶⁴ Thus, in cases when no services are provided to legal persons by financial entities in Kosovo, it is likely that these investments are made without identifying the beneficial owners.

One way to mitigate against the associated risks with the lack of adequate regulation of beneficial ownership is for the government to establish a centralized registry of beneficial owners. The use of centralized registries is a common effort to combat corruption and money laundering. Kosovo has yet to establish such a registry, despite having been advised to do so by external experts and international organizations such as the EU and the Council of Europe.

A positive step in the right direction, however, has been the drafting and publication of the “Concept Document for the Register of Beneficiary Owners” in September 2021.⁶⁵ The concept document provides a comprehensive overview of the current state of the identification and recording of beneficial owners in Kosovo, including the existing legal and regulatory framework, and includes a comparative analysis of the benefits and challenges of setting up a centralized register of beneficial ownership in the context of Kosovo.⁶⁶ Since the publication of the concept document, no new developments have been made with regard to the adoption of a special law on the establishment of a registry of beneficiary owners.



64 Council of Europe, Project against Economic Crime in Kosovo* (PECK II). (2018). *Assessment Report on compliance of Kosovo with international anti-money laundering and combating the financing of terrorism standards*. <https://rm.coe.int/assessment-report-on-compliance-of-kosovo-with-international-anti-mone/16809381e1>

65 See the Concept Document for Register of Beneficiary Owners, available at the Public Consultation Platform of the Government of Kosovo: <https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41267>

66 Ministry of Industry, Entrepreneurship and Trade. (2021). *Concept Document for the Register of Beneficial Owners*. <https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41267>

POLICY RECOMMENDATIONS

1. The Law on Financing of Political Parties should be amended to address the issues of digital campaigning, non-financial contributions, the self-financing of candidates, and third-party campaigning, which have been left out of the most recent legal amendments made to the Law on the Financing of Political Parties in 2022.
2. The Law on Financing of Political Parties should be amended in order to improve the categorization of sanctions and fines for the financial violations of political parties to better define the circumstances under which different fines are imposed. The current law provides a range of fines that can reach up to €40,000, however, it does not clearly specify the circumstances under which each fine will be imposed. The regulations must clearly state the types of fines that can be imposed by the Office under the CEC, as well as the corresponding amounts of each type of fine, and the specific violations for which they will be imposed. This will help create a more transparent and predictable regulatory environment, while also ensuring that penalties are imposed in a fair and consistent manner.
3. The capacities of the Office should be increased, with additional staff and increased financial resources to implement their mandate. This will be essential if the legislation is revised to expand the mandate of the Office to monitor digital campaigning and self-financing.
4. Beneficial ownership is currently regulated by secondary legislation in Kosovo, but it is important that this issue is regulated by the law. The government of Kosovo should prepare a draft-law for beneficial ownership, that takes into consideration best practices from EU Member States. In this context it is important that the process of drafting the law is not limited to the Ministry of Trade and respective institutions, but it is opened to media representatives and civil society, so that the law is developed in a holistic way regarding beneficial ownership.
5. It is highly recommended that, in addition to the business registry that is available in Kosovo, the Independent Media Commission and the Press Council of Kosovo, consider establishing and maintaining a public database that lists the true owners of all relevant media outlets in Kosovo.
6. Kosovo should implement measures to enhance its ability to determine beneficial ownership and to prevent the abuse of legal entities and structures. This can be done by the following:
 - a. Conducting national-level risk assessments to evaluate the different types of legal entities and assess their susceptibility and appeal to being used for money laundering and terrorism;
 - b. Implementing an administrative penalty for failing to notify the Business Registry of changes in ownership;
 - c. Strengthening supervision and increasing on-site inspections to guarantee that beneficial ownership information is collected and maintained.
7. Importantly, Kosovo should draft and adopt a new special law on the establishment of a register of beneficiary owners which should include the following:
 - a. A detailed description of steps to be taken by reporting entities to fulfil their obligations of identifying and verifying beneficial ownership;
 - b. The establishment of a division within the Business Registry responsible for overseeing the national database or national registry of beneficial owners with clearly defined responsibilities outlined in the law.

REFERENCES:

- About the IMC. (2023, February 1). Independent Media Commission. <https://www.kpm-ks.org/en/kpm/311/per-kpm/311>
- Administrative Instruction Nr. 15/2010 on Implementation of Law Number 03/L-222 on Tax Administration and Procedures. https://www.atk-ks.org/wp-content/uploads/2019/06/UDHEZIMI_ADMINISTRATIV_Nr._15_2010_A.pdf
- Avdiu, P. (2022). Public perception on trust, corruption, and integrity of public institutions in Kosovo. Kosovar Centre for Security Studies. https://qkss.org/images/uploads/files/WBSB_2022_Kosovo_Report_1_Dec_2022_ENG.pdf
- Berisha, I. (2015). Media Ownership and Finances in Kosovo: Legal Vacuum and Lack of Transparency. South East European Media Observatory. https://mediaobservatory.net/sites/default/files/Media%20Ownership%20and%20Finances%20in%20Kosovo_0.pdf
- Cakolli, E. (2022). Political Financing in Kosovo: What After the Recent Legal Changes? Kosova Democratic Institute. <https://kdi-kosova.org/wp-content/uploads/2022/12/47-Raport-Political-Financing-Kosovo-Eng-02.pdf>
- Cakolli, E. and Haxhiu, A. (2021). Financial transparency of candidates for mayors in the 2021 local elections. Kosova Democratic Institute. <https://kdi-kosova.org/wp-content/uploads/2021/11/59-Raporti-per-financat-e-kandidateve-per-kryetare-ENG-01.pdf>
- Central Bank of the Republic of Kosovo. (2016). Regulation on Prevention of Money Laundering and Financing of Terrorism. https://bqk-kos.org/repository/docs/korniza_ligjore/english/11-BQK%20-%20ENG%20%20Rregullorja%20-per%20parandalimin%20e%20pastrimit%20te%20parave.pdf
- Concept Document for Register of Beneficiary Owners, available at the Public Consultation Platform of the Government of Kosovo: <https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41267>
- Corruption Perceptions Index – Kosovo. (2023, January 7). Transparency International. <https://www.transparency.org/en/cpi/2022/index/ksv>
- Council of Europe, Project against Economic Crime in Kosovo* (PECK II). (2018). Assessment Report on compliance of Kosovo with international anti-money laundering and combating the financing of terrorism standards. <https://rm.coe.int/assessment-report-on-compliance-of-kosovo-with-international-anti-mone/16809381e1>
- Council of Europe, Project against Economic Crime in Kosovo* (PECK II). (2018). Assessment Report on compliance of Kosovo with international anti-money laundering and combating the financing of terrorism standards. <https://rm.coe.int/assessment-report-on-compliance-of-kosovo-with-international-anti-mone/16809381e1>
- European Commission. (2022). Commission Staff Working Document Kosovo* 2022 Report. <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Kosovo%20Report%202022.pdf>
- European Union Election Observation Mission in Kosovo. (2021). Final Report for Municipal Elections 17 October – 14 November 2021. https://www.eeas.europa.eu/sites/default/files/final_report_2021_eom_kosovo_municipal_elections_-_albanian.pdf
- Fana, V. (2022, March 4). Lufta me propagandë e lajme të rreme. KALLXO. <https://kallxo.com/gjate/lufta-me-propagande-e-lajme-te-rreme/>

- Interview with senior official from the Office for Political Parties Registration and Certification. (2022, November 30). Personal Interview.
- Ipsos Strategic Marketing. (2021). Trust in the Media – Kosovo. SEENPM. https://seenpm.org/wp-content/uploads/2021/09/Trust-in-the-media-Kosovo_tehnical-report.pdf
- Law No. 03/L-073 On General Elections in the Republic of Kosovo (2008). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2544>
- Law No. 03/L-174 On Financing of Political Parties (2010). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2705>
- Law No. 03/L-196 on the Prevention of Money Laundering and Terrorist Financing. <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806dc661>
- Law No. 06/L-016 on Business Organizations. <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=16426>
- Law No. 08/L-122 On Amending and Supplementing the Law No. 03/L-174 On Financing the Political Parties, Amended And Supplemented By The Law No. 04/L-058 And Law No. 04/L-122 And The Law No. 03/L-073 On General Elections in the Republic Of Kosovo, Amended And Supplemented By The Law No. 03/L-256. (2022). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=62600>
- Mehmeti, J. (2021). IN MEDIA WE (DIS)TRUST: Mapping citizens' concerns over media in Kosovo. SEENPM, Peace Institute and Kosovo 2.0. <https://seenpm.org/wp-content/uploads/2021/05/Resilience-research-publication-3-Kosovo-English.pdf>
- Ministry of Industry, Entrepreneurship and Trade. (2021). Concept Document for the Register of Beneficial Owners. <https://konsultimet.rks-gov.net/viewConsult.php?ConsultationID=41267>
- National Survey of Kosovo (2023, May 16). International Republican Institute (IRI). <https://www.iri.org/resources/national-survey-of-kosovo-feb-march-2023/>
- National Democratic Institute. (2022). Information Integrity in Kosovo: Assessment of the Political Economy of Disinformation. <https://www.ndi.org/sites/default/files/Information%20Integrity%20in%20Kosovo%20-%20Assessment%20of%20the%20Political%20Economy%20of%20Disinformation.pdf>
- Office of the Prime Minister. (2018). Country Commitments of the Government of Kosovo in the Field of Anti-Corruption. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/724309/Kosovo_Anti-Corruption_Pledges.pdf
- Senior official from the Financial Intelligence Unit. (2022, November 2). Personal interview
- Read more about the Office for Registration, Certification and Financial Control of Political Entities: <https://kqz-ks.org/an/office-for-pprc/>
- Senior officials from the Office for Political Parties Registration and Certification. (2022, November 30). Personal Interview.
- Shopov, V. (2020). 'Getting on the Radar': China's Rising Media Presence in South East Europe. Konrad-Adenauer-Stiftung. [https://bird.tools/wp-content/uploads/2020/12/"China's-Rising-Media-Presence-in-South-East-Europe".pdf](https://bird.tools/wp-content/uploads/2020/12/)
- Spahija, F. and Dupak, J. (2020). Office for Oversight of Funding of Parties in Republic of Kosovo and Czech Republic. Kosovo Democratic Institute and Transparency International Czech Republic. <https://www.transparency.cz/wp-content/uploads/2021/02/Office-for-oversight-of-funding-of-parties-in-Republic-of-Kosovo-and-Czech-Republic.pdf>
- The Law No. 03/L-073 On General Elections in the Republic Of Kosovo, Amended And Supplemented By The Law No. 03/L-256. (2022). <https://gzk.rks-gov.net/ActDetail.aspx?ActID=62600>

- Ugi Zvekic, U. and Roksandic, S. (2021). Infrastructure of Integrity: Western Balkans anti-corruption pledges monitor. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2020/10/Infrastructure-of-integrity-34-GITOC.pdf>
- Valencia, C. (2021). Understanding Beneficial Ownership and Legal Arrangements for Combatting Money Laundering. United Nations Development Programme. <https://www.undp.org/kosovo/publications/understanding-beneficial-ownership-and-legal-arrangements-combatting-money-laundering>
- Western Balkans Security Barometer. (2021). Do you think that political parties are corrupt? <https://securitybarometer.qkss.org/te-dhenat>
- Western Balkans Security Barometer. (2021). How much do you trust political parties? <https://securitybarometer.qkss.org/te-dhenat>

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