COALITION FOR REFORMS, INTEGRATION AND CONSOLIDATED INSTITUTIONS

in collaboration with:

# FINAL **OBSERVATION REPORT** ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

TIRANA, FEBRUARY 2022

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## **EXECUTIVE SUMMARY**

- The Coalition for Reforms, Integration and Consolidated Institutions (KRIIK Albania) has continuously followed almost all the institutional, legal and political processes related, directly or indirectly, to the integrity of the elections in Albania. KRIIK began to closely monitor the electoral process for the Albanian Parliament of April 25, 2021, since the announcement of the election date by the President of the Republic with a team of experts at central level, 22 long-term observers and short-term observers who followed the voting and counting of the votes processes, until the announcement of the final result, while continuing to closely follow elements of the electoral process not yet concluded, such as the "electoral audit", the audit of the finances of the electoral subjects, etc.
- KRIIK assesses the electoral process from the point of view of fulfilling the obligations deriving from the Albanian legal framework and the international obligations of the Albanian state (internationally recognized standards for democratic elections).
- The elections for the Albanian Parliament of April 25, 2021, were held in a highly polarized and conflicting political climate, with a pronounced lack of trust between the parties. The political agreement of 5 June 2020, mediated by the country's international partners, and as a result of which the electoral legal framework was amended, seems to have restored for a short period the communication and cooperation between the parties, communication was seriously damaged again as the current majority undertook unilateral constitutional and legal changes in July and October 2020.
- The majority entered these elections with the advantage of being in complete control of public institutions, which gave it an advantage in the electoral process and significantly blurred the dividing line between the state and the party throughout the process.
- The most disturbing part is that in these elections was the polarization of the political climate brought out, more than in previous elections, the strong politicization of public institutions at all levels. In a number of cases, partisan and biased behavior was observed by these institutions, including independent institutions or law enforcement agencies.
- Adding to the harsh political rhetoric and accusations among electoral subjects was the unnatural involvement of the President of the Republic in the electoral race by holding throughout the campaign a clear stance against the ruling majority and engaging the Presidency institution in election campaign, against the current majority.
  - The Socialist Party, on the other hand, encouraged and highlighted this non-institutional approach of the President by targeting the latter as a party involved in the electoral process, unifying it with the opposition leaders, as well as using the above narrative institutionally as well as in view of its election campaign. Such behavior, either by the President or by the

majority, is estimated to have had an even greater impact on reducing the level of trust of Albanian citizens in key state institutions.

- The legal framework guarantees the conduct of elections in accordance with international standards for democratic elections, if implemented in good faith. The elections were conducted with a significantly changed legal framework. The legal amendments, although bringing changes that improve the legal framework, failed to address, or treat in depth the acute issues that are expected to be addressed by the new Assembly Legislature.
- Although they had ample time available, and when it was more than clear that this year's
  elections would be held in conditions of health emergency, as a result of COVID-19,
  lawmakers did not take any measures to guarantee a normal electoral process, which would
  also ensure the protection of public health. Public health and election administration
  institutions were passive and slow in addressing the rules that had to be followed regarding
  holding elections during the pandemic.

However, the pandemic was used by public health institutions to ban Albanian citizens living in Greece or Macedonia from exercising their right to vote, a measure which did not seem to be based on rational reasons for the increase in cases in these countries and seems to be based on electoral calculations of the ruling majority.

- Two constituencies deviate from the average number of citizens for the mandate in the April 25 Elections, however this deviation is in line with good election practices. However, if the number of seats is calculated based on the number of eligible voters, or the number of voters who actually vote, the differences between the districts undermine the principle of equality of the vote and deviate from good practice.
- The fictitious legal barriers that were set with the October 2020 legal changes for the reranking of candidates almost nullified the effect of the voters' preferential votes, damaging the representation and leaving the citizens speechless in the selection of their representatives, despite the unilateral constitutional changes of July 2020 were justified precisely by the empowerment of citizens. The legal threshold of 1% nationwide, proved to be an insurmountable barrier for the candidates proposed by the voters. This threshold significantly limits the ability of civic groups to nominate candidates, favoring political parties.
- After legal amendments, which reflected the Political Agreement of 5 June 2020, the CEC institution was remodeled into an institution with a trilateral leadership structure. Throughout its operation, the governing bodies of the CEC reflected a behavior that was not that of a single institution, but of three of them, functionally separated from each other.
- The inclusion of former political officials, or even former cabinet officials, along with individuals allowed to run is not in the spirit of the aspiration for an impartial and politically independent election administration and leaves room. for the selection of political candidates. Although reformatting of the CEC should have been a step towards the establishment of an independent institution, also reflecting the spirit of the Political Agreement of 5 June 2020, KRIIK notes that political influence and affiliation was present in behavior, and sometimes in voting the membership of the Regulator and KAS.

- The CEC administered the elections efficiently and transparently but did not show a proactive
  approach to other elements of the process, which are within its competence, such as overseeing
  the conduct of the media during the election campaign, monitoring the election campaign, or
  overseeing the use of public resources for electoral gain.
  - Overall, the CEC decision-making was transparent and regularly published on the institution's website, including preliminary meeting materials.
- The implementation of electronic verification of citizens is considered to have significantly
  facilitated the election administration process, as well as increased the guarantee of the
  process, despite restrictions, such as not connecting devices to each other in real time or
  disconnection between the fingerprint and the voter, or even implementation problems during
  election day.
- The CEAZs performed their duties efficiently in terms of the EAZ election administration
  process. However, there is a need for further improvements in specific aspects of election
  administration in terms of last-minute replacements and training of new members. In sporadic
  cases were observed lack of knowledge of the legal framework and lack of transparency
  towards observers.
- The total number of Albanian citizens with the right to vote for the elections of April 25, 2021, was 3,588,869. Restriction of the right to vote for persons with mental health disorders, even through a court decision, is considered by KRIIK to be contrary to the international obligations of the Albanian state. *A priori* removal from the voter list of citizens over the age of 100 is also considered a violation of their right to vote and age discrimination. Failure to vote for immigrants resulted in a lost case as well as a violation of the political commitments of the parties, according to the Agreement of 5 June 2020.
- Some municipalities had problems publishing voter lists, especially during the first three
  months. These problems consisted of the delayed publication of extracts of electoral
  constituents or in some cases their non-publication in appropriate places that met the legal
  criteria.
- The written notification of the voters suffered from the same problems that accompanied it in
  previous election processes. Issues ranging from how the notification model was drafted, its
  progress in the field, the lack of reliable information regarding the implementation of the
  process and the contradictory information collected by KRIIK observers and from the
  municipalities towards the Ministry or the Central Commission of Election.
- The process of registration of electoral subjects was carried out according to legal provisions. In a comprehensive and efficient process, the CEC registered 17 electoral subjects two coalitions, ten political parties and five independent candidates. The number of support signatures to register as electoral subjects in the absence of a parliamentary mandate is in line with good election practices. Despite this, the gathering of support signatures proved to be a barrier to the candidacy of independent candidates.
- The lack of a clear definition of the campaign in the law, creates the possibility for electoral subjects to bypass the legal provision and start the campaign earlier than the legal deadline of 30 days before election day. The political parties participating in the elections, unveiled the

- political programs and held meetings with a clear electoral character with the citizens a few months before the official start of the campaign, in violation of the law.
- The election campaign was dominated by political party leaders and lacked rational debate, based on concrete government programs, and offers. Freedom of expression and assembly was respected throughout the campaign despite restrictions imposed on the protection of public health as a result of the Covid-19 pandemic.
  - Political parties campaigned ignoring the restrictions placed on protecting public health and putting the lives of citizens at risk.
- The campaign was poor in confrontation of platforms and lacked focus on citizens. Political
  party leaders were at the center of it, and individual candidates were pushed to the background.
  Part of the campaign rhetoric was based on discussing the individual characteristics of party
  leaders, in some cases escalating into personal denigrating campaigns.
  - Allegations of voter intimidation, vote-buying, campaign involvement, and other election manipulation prevailed during the campaign. The conflicting language used during the campaign escalated into violent incidents, including an armed conflict, which left one victim and several injured in Elbasan.
- The publication of a database of potential voters during the campaign highlighted the acute problem of total vote control and political patronage, which goes beyond legitimate party organization. The information contained in the database, as far as it has been made public in the media, constitutes an open violation of domestic legislation on personal data. While the possibility that this data was provided by the digital platform *e-Albania* would constitute a flagrant case of abuse of state resources.
- Senior officials, at central and local levels, engaged intensively in the campaign, using the public office for electoral advantage. In general, institutional, and state activities during the campaign were used in almost all cases for the election campaign, which blurred the dividing line between party and state.
  - The active participation of the public administration in the events of the electoral campaign was present in these elections as well, both physically and on social networks.
- The mechanism aimed at addressing the problem of misuse of state resources, one of the innovations brought by the legal amendments of July 2020, failed in its purpose and turned into a bureaucratic formality with no real effect in practice. State institutions failed to a significant extent to report according to the requirements of the legal framework.
  - The State Election Commissioner did not reflect a proactive stance in order to sanction state officials, especially after the decision of the KAS that lifted the sanctions against the mayor of Tirana.
- The shadow campaign continues to be a very disturbing phenomenon and one of the ways of hiding the expenses of the election campaign. In these elections the shadow campaign can be clearly identified by the amount of spending incurred on political advertisements on *Facebook*

by politically unaffiliated pages with no electoral subject but having spent significant sums on political advertisements.

• The media, both traditional and *online*, were widely engaged in covering the early election campaign, the official one and even the officialization of the result in these elections.

The lack of a healthy critical approach to information transmitted by the media remains a concern. Broadcasting ready-made propaganda chronicles diluted the role of the media and its uninfluenced reporting function.

Debates between the candidates were absent, despite the high number of political TV shows. The public did not have the opportunity to see the electoral platforms confronting each other.

• In the weekly reports that AMA sent to the CEC, it repeatedly drew attention to the media service providers to compensate for the balance of coverage in the informative editions. However, the identified media companies, in addition to not complying with the AMA request, increased the differences until the end of the campaign.

Despite the fact that the law provides for fines up to the stopping of broadcasting signal for non-compliance with balances during the election campaign, the CEC did not take any steps against the media service providers who repeated this violation.

The media oversight mechanism and the media themselves failed to ensure that Albanian citizens were informed impartially and objectively throughout the campaign.

- In reviewing complaints and appeals, the KAS often showed a narrow reading of the law, ignoring its spirit. Beyond a decision-making related to a certain electoral process, these decisions of the KAS set negative precedents for its ongoing decision-making, not only in this electoral process but also in the future.
- The fact that despite the legal definition that obliges political parties to respect the gender quota by sanctioning them by rejecting the multi-name list in case of non-fulfillment, for some entities the list was returned for completion by the CEC and due to non-fulfillment of this obligation remains disturbing.
- In the April 25 election, 46.33% of registered voters cast their ballots; 44.99% of voters who voted were women. Out of 17 competing electoral subjects, four emerged as parliamentary parties: The Socialist Party of Albania received 48.67% of the vote and 74 seats, the Democratic Party Alliance for Change 39.43% of the vote and 59 seats, the Socialist Movement for Integration 6.81% of the vote and 4 seats and the Social Democratic Party 2.21% of the vote and 3 seats.
- A major problem is the extremely high number of invalid ballots in this election, which in practice is equivalent to about seven seats. It remains unclear to what extent this concerns misinformation of citizens and the potential alienation of votes during the counting process.
- The harsh political rhetoric and conflict that accompanied the election campaign did not extend to election day, which took place without incident or serious problems.

The voting process was smooth and procedurally well administered, with the exception of problems with the Electronic Identification Device in a number of polling stations.

The observed procedural violations are not considered to have negatively and significantly affected the process.

A major concern remains the illegal and improper influence of voters in the vicinity of polling stations, in line with the indications during the election campaign for organized voting structures.

- Family voting and vote photography were phenomena that were observed in a relatively high number of Polling Stations. What was most worrying was the tolerance of the Polling Station commissioners towards these phenomena, especially towards the photographing of the vote.
- The difficulty or even the impossibility in many Polling Stations for voters with disabilities to exercise their right to vote remained an un-addressed phenomenon even in these elections.
  - Polling Station Commissioners did not pay attention to the implementation of legal provisions regarding the assistance of these persons, or other persons who requested assistance during the voting. Behavior by circumventing the obligation to complete the relevant statement by the voter assisting the other voter or allowing one person to assist more than one voter.
- In contrast to the voting process, vote counting was accompanied by tensions, delays, and interruptions in a considerable proportion of BCCs, especially during the counting of preferred ballots for candidates. The administration of the counting process was not characterized by the same level of efficiency and transparency as that of voting.
- The executive will of the commissioners towards the law and the institutional hierarchy remained secondary, concluding with unjustifiable delay the counting and the issuance of results by the CEAZs. Even more troubling was the fact that the counting of preferred votes did not receive the proper attention. This not only during the counting process, but as an ongoing attitude throughout the construction and development of the electoral process and throughout the election campaign.
- During the counting process, the presence of unauthorized persons continued to be a significant problem, both in the surrounding areas of BCCs and inside them, because of which tense situations and even violent incidents were present.

## I. INTRODUCTION

The Coalition for Reforms, Integration and Consolidated Institutions (KRIIK Albania) has continuously followed, since the end of the observation action of the Parliamentary Elections 2017, almost all institutional, legal and political processes that are directly or indirectly related to the integrity of elections in Albania, including the political crisis, which was clearly outlined in February 2019 with the resignation of the mandates of the opposition deputies, the preparatory progress and the conduct of the Local Government Elections of 2019, together with all the processes and institutional stalemates that accompanied and followed them, the electoral reform process starting from October 2017 onwards, as a conclusion agreed by the Political Council, the unilateral constitutional and legal changes of July and October 2020 that followed, as well as other institutional processes of political importance that precedes the Elections for the Assembly of Albania of April 25, 2021.

KRIIK's opinions and positions on these developments have been continuously made public through Statements or Positions, Open Letters, public events, as well as through opinions and suggestions, public or not, sent to lawmakers regarding electoral reform, the Central Election Commission regarding the bylaws in completing the regulatory framework for this electoral process, or through meetings with political and institutional actors, including the Special Parliamentary Commission on Electoral Reform, the Central Election Commission, key political actors, international actors, etc.

Throughout this busy activity aimed at improving the integrity of elections in Albania, the primary goal of KRIIK remains a critical and constructive spirit, identifying strengths and issues that require improvement, as well as providing concrete short-term and long-term recommendations for further improving the process.

KRIIK has started to monitor the Election Process of April 25, 2021, for the Assembly of Albania in its entirety since the announcement of the date of the elections by the President of the Republic, on September 6, 2020.

KRIIK paid special attention to monitoring the selection of members of the three governing bodies of the Central Election Commission, based on the legal changes of July 2020, which came as a result of the Political Agreement of 5 June 2020. This, in particular, after the Public Positioning "June 30 as a failure of the political class and a threat to democracy", published on 23 August 2019 by KRIIK, after the Local Elections of 2019, through which called, among other things, for the dissolution of the CEC body, as the June 30 process had set a series of absurd and illegal precedents, which could only be eliminated with a drastic reorganization of the institution.

This monitoring report summarizes the observation of this election process, as well as the institutional and legal behavior of the actors involved in it, from the date of the announcement of the elections until the end of the post-election audit process of the ballot boxes and the legal audit of election campaign financing. Some sections of the report (such as the political context or the process of reforming the electoral legal framework) refer to periods of time that precede the above-mentioned electoral period, with the need to clarify the context in which this electoral process took place.

The publication of this final report was preceded by the publication of the <u>First Interim Report</u>, which covered the period from the date of the announcement of the elections until March 25, 2021; <u>Second</u>

<u>Interim Report</u>, which covered the period from March 26 to April 23, 2021; <u>Statement of Preliminary Findings and Conclusions</u>, published on April 26, 2021 after election day, as well as <u>Preliminary Statement on the Counting Process</u>, published on April 30, 2021 at the end of the counting process

Beside all these, KRIIK has held several other press conferences, especially during the most intensive phase of the election process, throughout Election Day and the vote counting process. A <u>Press Conference</u> was held on March 11, 2021, at which KRIIK made public its concerns regarding four important issues of the electoral process, which, in KRIIK's judgment<sup>1</sup>, needed to be urgently addressed by the responsible actors in the remaining period until on election day. During the election day, four press conferences were held<sup>2</sup> through which the public was informed about the findings by field observers, as well as three other press conferences<sup>3</sup> during the counting process.

In addition to the continuous monitoring of contextual political and institutional elements, the monitoring of the technical elements of the process is focused on the conduct and decision-making of the Central Election Commission, as well as the conduct and law enforcement of the CEC administration; fulfillment of legal obligations by the Commissions for Election Administration Zone, institutions and other actors involved in the electoral process or that play a role in it; the election campaign (both early and within the period provided by law); the conduct of electoral subjects and institutions, as well as the use of state resources for electoral gain; the conduct of the media and the AMA; the progress of election day and the counting process, as well as the process of complaints and appeals, the construction and implementation for the first time of the process of reviewing ballots and election materials (post-election audit), as well as the full process of financial self-reporting of the election campaign conducted by electoral subjects and candidates, as well as the legal audit conducted on the financing of the election campaign.

KRIIK engaged 22 long-term observers across the country from late February to early May, who observed key elements of the process. As Election Day approached, about 900 short-term observers were engaged to observe the voting process as well as the activity of the zonal election administration commissions in all CEAZs of the country before and during Election Day, as well as during the counting of votes.

KRIIK observed the procedures for opening polling stations, the voting process and closing polling stations in 360 probabilistically selected VCs across the country<sup>4</sup>; as well as the situation around polling stations and the voting process in about 900 polling stations, with teams of two mobile

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<sup>&</sup>lt;sup>1</sup> Urgent issues raised to be addressed were: (1) the impact that Covid-19 would have on the organization of the electoral process, especially regarding the right of assembly and the right to vote; (2) the integrity of the candidates proposed by the electoral subjects; (3) opportunities for Albanians living abroad to exercise their right to vote, and (4) the use of state resources during the election campaign.

<sup>&</sup>lt;sup>2</sup> Press Conference 1, dated 25 April 2021, at 12:00

Press Conference 2, dated 25 April 2021, at 15:30

Press Conference 3, dated 25 April 2021, at 18:00

Press Conference 4, dated 25 April 2021, at 23:30

<sup>&</sup>lt;sup>3</sup> Press Conference 1, dated 26 April 2021, at 22:45

Press Conference 2, dated 27 April 2021, at 22.00

Press Conference 3, dated 28 April 2021, at 22:15

<sup>&</sup>lt;sup>4</sup> Observation of 360 randomly selected polling stations guarantees generalization of findings with an error margin of  $\pm$  5%, with a 95% confidence interval.

observers on election day<sup>5</sup>. In addition to the above, the activity of the CEAZs with stationary observers was monitored throughout the election day, as well as visits to the CEAZs on Friday and Saturday, while the CEAZs prepared and distributed election materials for the Voting Center Commissions. The counting process was followed in all BCCs of the country with short-term observers.

The final observation report, in addition to describing the electoral process and analyzing it from the point of view of fulfilling the obligations deriving from the Albanian legal framework and the international obligations of the Albanian state (internationally recognized standards for democratic elections), also provides recommendations regarding improving integrity. of the electoral process, with the main focus on legal amendments, but also in relation to the correct implementation of the existing legal framework, as well as the behavior of institutions and actors involved in the electoral process. It is important to note that this Report, for the first time in the monitoring by KRIIK of a general parliamentary<sup>6</sup> electoral process, also contains the financing of electoral subjects in an integral way, as an essential and very important part in the analysis and evaluation of an electoral process. We bring to your attention that the gravity of the problems contained in the financing of the election campaign can lead to the nullification of the election result or process. Moreover, in the Albanian reality, the process of transparency and control of the finances of political parties and election campaigns has never been carried out, even in part, often promoting in the state-building process in which the country finds itself, illegality, inequality before the law and impunity of individuals. and entities with links or affiliations with politics and power. On the other hand, the factual situation of rampant corruption and the presence of organized crime aggravate the problem even more, and even risk leading to the seizure of power or even the state itself.

In the elections of April 25, 2021, voted 1 662 274 voters or 46.33% of registered voters. 44.99% of the electorate that voted were women. The constituency with the highest percentage of voters who voted was Tirana Region with a turnout of 56.13% and the constituency with the lowest number of participants was Vlora Region with a turnout of 33.56%. In the 5,198 polling stations that were counted, 1,661,176 ballot boxes were found, 83,059 (5%) of which were declared invalid during the counting process. The extremely high number of invalid ballots in this election, which in practice is equivalent to about seven seats, is a major problem. From the post-election audit conducted by the CEC and the inspection of invalid ballot papers, it still remains unclear how much is the weight of not informing the citizens and how much is the potential alienation of votes during the counting process. The distribution of invalid votes is almost equal between the different constituencies. The

<sup>&</sup>lt;sup>5</sup> Mobile observers had a different observation methodology from those stationary ones. If the former focused on all the technical elements of the process, throughout the election day at the polling station where they were located, the latter focused more on the situation outside the polling stations and visited polling stations, which were considered to be problematic. The mobile observers also followed the technical voting procedures at the visited polling stations, but their findings are technically incomparable to those of the stationary observers, who followed the process throughout the day. This is because mobile observers followed these procedures only for short periods of time (on average they spent 30 minutes in a polling station).

<sup>&</sup>lt;sup>6</sup> The application of this methodology for the first time by KRIIK, was made for the Monitoring of the Local Elections of June 30, 2019. For more see: Monitoring Report "<u>Legal and institutional behavior of institutions and actors involved in the June 30 election process 2019</u>", (monitoring period November 2018 - February 2020), published by KRIIK in June 2020.

municipality with the lowest number of invalid votes is Himara, with 2.11% of invalid votes, while the one with the highest number of invalid votes is Bulqiza which reaches 8.84% of the votes.

Out of 17 electoral entities running in the process (12 political parties running across the country and 5 independent candidates running in one constituency each), four of them emerged as parliamentary parties. The Socialist Party of Albania received 48.67% of the vote and 74 seats, the Democratic Party - Alliance for Change 39.43% of the vote and 59 seats, the Socialist Movement for Integration 6.81% of the vote and four seats and the Social Democratic Party 2.21 % of votes and three seats. None of the other electoral subjects exceeded the 1% threshold of votes nationwide.

The Election Observation Action for the Albanian Parliament of April 25, 2021 was carried out in cooperation with 33 partner organizations, which operate throughout the country: Ionian Environment, Media, Information Agency - Saranda; The Past for the Future - Korca; Epoka e Re - Fier; Civil Forum Selenica - Selenica; Elbasan Women Forum - Elbasan; Oil Woman in the Focus of Development - Kuçova; Woman in Development - Korça; Local Integration Action Group - Debar; Youth Movement for Democracy Puka - Puka; Movement for Tourism Development - Ksamil; Association Environmental Protection and Tourism Development - Has; Protection of the Rights of Persons with Disabilities (MEDPAK) - Librazhd; Flower Initiative - Saranda; National Platform for Women - Fier; Rome Gate for Integration - Kruja; Embroidery Association - Korça; I Woman - Pogradec; Women and Social Services Counseling Center - Kukës; Counseling Center for People with Disabilities - Shkodra; Social Center to Help People in Need - Fushë Arrëz; Civil Society Development Center - Durrës; Hand to Hand Against Nation Apathy - Lezhë; Vlora Youth Center - Vlora; Association for the Protection of Rural and Civic Women's Rights - Berat; Alpine Association - Tropoja; Young Environmental Experts Association -Bulqiza; Association for Women and Children - Tirana; Hope Ray Association - Vau Dejës; Independent Trade Union of Typographers - Tirana; The Youth of Ura Vajgurore - Ura Vajgurore; Together for Roma Integration - Fier; Youth for Social Changes - Vora; and Consulting and Development Partners - Shkodër.

KRIIK thanks all the institutions, local and central, with which it has cooperated and received information; election administration, starting with the Central Election Commission, as well as other interlocutory bodies that have assisted in gathering information.

KRIIK also thanks the financial supporters of the Parliamentary Election Observation Project of 25 April 2021, without whose support an observation action on such a scale would not have been possible.

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The opinions and views expressed in this Report and in any other publication in the framework of this observation action, are the responsibility of KRIIK and do not necessarily represent the official position or opinion of donors.

## II. POLITICAL AND INSTITUTIONAL CONTEXT

The elections for the Albanian Parliament of April 25, 2021, were held in a highly polarized and conflicting political climate, with a pronounced lack of trust between the political parties. This climate was reflected in the behavior of public institutions during the election period, including the election administration, as well as other institutions that play a role in the electoral process. Furthermore, the particular situation in which these elections were held, the opposition off all public institutions, as a result of the waiver of parliamentary seats in February 2019 and not taking part in the 2019 local elections, the current majority went into these elections with the advantage and being in complete control of public institutions, which gave it an advantage in the electoral process and significantly blurred the dividing line between the state and the party throughout the process.

The conflicting political climate, which began to escalate a few months before the 2017 Parliamentary Elections and continued to escalate further with the resignation of mandates from the main parliamentary opposition parties in February 2019 and their boycott of the 2019 Local Elections, leading to an unprecedented situation in 30 years of Albanian democracy, where the opposition was unrepresented in the decision-making and institutional sphere in the country.

Worrisome in these elections was the polarization of the political climate brought out, more than in previous elections, the strong politicization of public institutions at all levels. In some cases, partisan and biased behavior was observed by these institutions, including independent institutions or law enforcement agencies.

Adding to the harsh political rhetoric and accusations among electoral subjects was the unnatural involvement of the President of the Republic in the electoral race by holding throughout the campaign, especially as election day approached, a clear stance against the ruling majority and engaging the Presidency institution in election campaign, against the current majority. The Socialist Party, on the other hand, encouraged and highlighted this non-institutional approach of the President by targeting the latter as a party involved in the electoral process, unifying it with the opposition leaders, as well as using the above narrative institutionally as well as in view of its election campaign. Such behavior, either by the President or by the majority, is estimated to have had an even greater impact on reducing the level of trust of Albanian citizens in key state institutions.

The conflict between the ruling majority and the President of the Republic culminated immediately after election day, while the counting process was still going on, with strong political statements by senior representatives of the majority just three days after the election<sup>7</sup>, which were then followed by institutional steps such as the establishment of a Special Parliamentary Commission to investigate the role of the President during the election campaign and undertaking of steps to discharge him.

Such an action significantly diverted attention from the electoral process that was still in progress, specifically from the process of complaints and appeals, putting the political-institutional conflict in the foreground, and putting under pressure and overshadowing the very important process of electoral justice, as the last stage of the electoral process.

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<sup>&</sup>lt;sup>7</sup> Meanwhile, Prime-minister Rama <u>declared</u> two days before the elections, on April 23, 2021, that if President Meta did not resign after April 25, he would be dismissed from the existing Assembly.

Parliamentary Commission closed its investigation on 24 May and, by its proposal, dated June 9th Assembly decided the impeachment of President. This decision of the Albanian Parliament has already been taken into consideration by the Constitutional Court, which is expected to give its judgment on this decision very soon.

The elections were conducted with a significantly changed legal framework. Most of the legal amendments came after the political agreement between the majority, the non-parliamentary opposition, and the parliamentary opposition. After a series of failures to carry out a comprehensive electoral reform since 2012, in June 2020 the majority and the opposition agreed on a package of indepth amendments to the election legal framework, through a Political Agreement signed on 5 June 2020. The lack of trust between the parties and the unwillingness to cooperate became clear throughout the political negotiation process and the agreement was secured only after a process of negotiation and mediation by the ambassadors of Albania's most important international partners. The June 5, 2020, agreement, despite failing to bring about a full and comprehensive reform of the legal framework and suffering from a lack of transparency, was hailed by international and domestic actors, including KRIIK, as a first step towards building trust between political parties and restoring to the institutional floor of communication and political interaction between them.

However, the conflict and lack of confidence resurfaced just days after the signing of the June 5 Agreement, when the majority and the parliamentary opposition unilaterally amended the Constitution of the Republic to pave the way for further amendments to the electoral legal framework, but now uncoordinated with the opposition<sup>9</sup>. The extra-parliamentary opposition reacted strongly to this change, which, among other things, eliminated the possibility for political parties united in preelection coalitions to submit lists of candidates for each party in the coalition, considering it a violation of the June 5 Agreement.

The constitutional changes were carried out in a very short time, in violation of certain laws and principles<sup>10</sup> and without the political consensus of all the most important political actors in the country. The changes were followed by other unilateral amendments to the Electoral Code on 5 October 2020. These amendments were approved without changes, even after the President of the Republic returned them for reconsideration in parliament, considering them "in open violation of the Constitution of the Republic of Albania and the basic democratic principles protected by it."<sup>11</sup>.

In this almost pre-state political and institutional context, accompanied by handicaps and problems encountered by the difficulties of the Justice Reform and the pronounced lack of trust among political actors, the electoral process of April 25, 2021, was of vital importance for smoothing of political

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<sup>&</sup>lt;sup>8</sup> Composed of candidates for MPs who were on the waiting list in the lists of candidates for opposition MPs. After the political decision of the opposition to leave the mandates in the bloc by all the deputies and other candidates that followed in the waiting list, these candidates rejected this political decision and accepted the mandates of the opposition deputies already submitted. This allowed the parliament to continue to work since then with 122 deputies, 140 deputies are expected to be in the Parliament.

<sup>&</sup>lt;sup>9</sup> For more on the nature of the amendments see the section on the legal framework.

<sup>&</sup>lt;sup>10</sup> For more see <u>Public Position "Breaking the Political Agreement and unilaterally amending the Constitution, a very dangerous precedent for the democratic future of the country"</u>, published by KRIIK on July 17, 2020.

Decree no. 11797 of the President of the Republic, dated 22.10.2020. "On the return of law no. 118/2020 'For some additions and amendments to law no. 10019, dated 29.12.2008, 'Electoral Code of the Republic of Albania', amended'"

conflict and balancing powers by re-legitimizing them, institutional life and law enforcement force based on the expressed will of the sovereign in this process, his free and inviolable will.

The aspiration of the Political Agreement of 5 June 2020 had as its first test the development of this electoral process, which, like the previous processes, took place based essentially on the behavior and will of the main political forces that also have an administrative role in the process, and which are again the three largest political forces: Socialist Party, Democratic Party and Socialist Movement for Integration.

The next test of the Agreement of June 5, 2020, will be the commitment of political parties, whether in the majority or the opposition, to reform the legal framework on elections, or legislation that is closely related and affects the electoral process, and in particular that regulates political parties, political financing and de facto depoliticization of the state administration. The aspirations set by it regarding the strengthening of the integrity of the elections can be used continuously by the political parties as a basis for further, deeper and more complete discussions and technical changes of the legal framework.

## III. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

# III.1. Legal Framework

Elections are regulated by the Constitution of the Republic of Albania<sup>12</sup>, from the Electoral Code<sup>13</sup>, adopted in 2008 and amended four times in a row, the last two amendments in 2020; other laws that regulate certain aspects of elections or affect their conduct<sup>14</sup>; acts of the Central Election Commission; as well as the decisions of the Electoral College. The Electoral Code describes the electoral system, regulates election administration, registration of electoral subjects and candidates, voter registration, election campaigning, media coverage of the campaign, funding of electoral subjects, announcement of results, and the process of complaints and appeals.

The Constitutional Court, in its decision of 7 May 2013, has excluded itself from examining electoral matters, relinquishing its obligation to ensure due process and constitutional rights, a move criticized by domestic observers (KRIIK /CDO) and international ones (ODIHR 12), and for which is recommended its return to fulfill the function that are recognized by Constitution of the Republic.

Albania has ratified or is part of a number of international conventions or treaties, which regulate civil and political rights related to elections<sup>15</sup>, and which the Albanian state has the obligation to implement<sup>16</sup>.

The elections of 25 April 2021 took place with a legal framework changed in many of its elements. Since the 2012 reform, political actors have repeatedly pledged to undertake a thorough and comprehensive reform process of the electoral legal framework. These attempts have failed several times, without even leading to any amending legal text. A rare exception were the changes to the regulatory framework in 2017, when on the eve of the start of the election campaign some last-minute legislative changes were undertaken, following the political agreement of 18 May 2017 between the leader of the Socialist Party and that of the Democratic Party.

<sup>16</sup> Constitution of the Republic of Albania, Article 5.

<sup>&</sup>lt;sup>12</sup> Constitution of the Republic of Albania.

<sup>&</sup>lt;sup>13</sup> Law no. 10 019, dated 29.12.2008, Electoral Code of the Republic of Albania, (amended by laws no. 74/2012, dated 19.07.2012, no. 31/2015, dated 02.04.2015, no. 101/2020).

<sup>&</sup>lt;sup>14</sup> Law No. 8580, dated 17.2.2000, For Political Parties, amended by laws no. 9452, dated 2.2.2006, no. 10 374, dated 10.2.2011, no.17/2014 and no. 90/2017, dated 22.5.2017, no. 135/2020, dated 16.11.2020; abrogated a sentence by the decision of the Constitutional Court no. 33, dated 9.5.2001; <u>Law on guaranteeing the integrity of persons elected, appointed or exercising public functions</u>, known as the Decriminalization Law; <u>Law on Assemblies</u>, <u>Law on Audiovisual Media in the Republic of Albania</u>; <u>Criminal Code</u>, in the chapter "*Criminal offenses affecting free elections and the democratic electoral system*"; <u>Code of Administrative Procedure</u>, which regulates the administrative activity of the CEC, etc.

Among others, the Albanian state has ratified or is part of <u>International Covenant on Civil and Political Rights</u>, became part of in 1991; <u>International Convention on the Elimination of All Forms of Racial Discrimination</u>, became part of in 1994; <u>Convention on the Elimination of All Forms of Discrimination against Women</u>, became part of in 1994; <u>Convention on the Rights of Persons with Disabilities</u>, became part of in 2013, <u>European Convention on Human Rights</u>, ratified in 1996; <u>Framework Convention of the Protection of National Minorities</u>, became part of the year 1999 etc.

The electoral reform, which ended in 2020, began with the Assembly's decision in 2017 to establish a Special Parliamentary Commission for Electoral Reform<sup>17</sup>. The mandate of this Commission was extended several times over the course of about three years<sup>18</sup> and held several sessions<sup>19</sup>, but without concluding on any amendment. This impasse was aggravated with the boycott and the handover of mandates as a bloc of deputies from the Democratic Party and the Socialist Movement for Integration in February 2019.

After several attempts to include representatives of the extra-parliamentary opposition in the Parliamentary Commission, in January 2020, political actors agreed on an extra-institutional module to discuss draft amendments to the electoral legislation. According to this agreement, the so-called Political Council was set up, consisting of four members with representatives of the majority and the parliamentary opposition, as well as the Democratic Party of the Socialist Movement for Integration, as representatives of the extra-parliamentary opposition, to prepare and agree on draft amendments within March 15, 2020<sup>20</sup>.

After exceeding the previous term of operation, also due to the Covid-19 pandemic, and the considerable difficulties in agreeing<sup>21</sup>, the parties agreed on a Political Document on 5 June 2020<sup>22</sup>. An agreement at that time, which was welcomed by both the country's partners, the diplomatic missions<sup>23</sup> as well as by local actors, including KRIIK<sup>24</sup>. The text of the legal amendments was subsequently drafted on this Agreement, which was approved by the Albanian Parliament on 23 July 2020.<sup>25</sup>.

<sup>&</sup>lt;sup>17</sup> Assembly of the Republic of Albania, Decision no. 102, 2017, "On the establishment of a special parliamentary commission for the implementation of electoral reform."

<sup>&</sup>lt;sup>18</sup> Assembly of the Republic of Albania, <u>Decision no. 103/2019</u>, <u>dated 12/09/2019</u>, "On some changes and additions to the decision of the Assembly no. 102/2017 "On the establishment of a Special Parliamentary Commission for the implementation of electoral reform", amended ".

<sup>&</sup>lt;sup>19</sup> Throughout almost 3 years of activity, the Special Commission conducted only <u>18 sessions</u>; on 10/11/2017, 01/12/2017, 14/02/2018, 09/03/2018, 23/03/2018, 20/04/2018, 20/04/2018, 08/05/2018, 06/06/2018, 07/05/2019, 24/05/2019, 10/10/2019, 24/10/2019, 05/11/2019, 18/11/2019, 05/12/2019, 19/12/2019 and 06/05/2020.

<sup>&</sup>lt;sup>20</sup> The text of the Agreement provided, among others, that the parties involved undertake to address by consensus all matters relating to electoral administration that were the subject of the work of the Electoral Reform Commission, including the recommendations of the OSCE / ODIHR. For issues not agreed upon would require the opinion and assistance of international experts.

<sup>&</sup>lt;sup>21</sup> KRIIK Albania, <u>Public Statement</u>, dated 31/05/2020, "Electoral Reform far from the aspirations and expectations for a real, deep and comprehensive reform".

<sup>&</sup>lt;sup>22</sup> The text of the Agreement set out 12 points, which included agreements on biometric identification and election administration.

<sup>&</sup>lt;sup>23</sup> Embassy of the United States in Tirana, <u>Press release</u>, dated 05.06.2020.

<sup>&</sup>lt;sup>24</sup> KRIIK Albania, <u>Open Letter</u>, of 16/06/2020, "The consent reached in the agreement of 5 June, as a moment of leadership to overcome the experience so far".

<sup>&</sup>lt;sup>25</sup> Parliament of Albania, <u>Law</u> No. 101, dated 23/07/2020, "On some changes and additions to law no. 10 019, dated 29.12.2008", "Electoral Code of the Republic of Albania", amended".

The July interventions in the Electoral Code led to the amendment<sup>26</sup>, addition<sup>27</sup> or repeal<sup>28</sup> of 80 legal provisions in total.

The two essential changes in the legal framework are estimated to be the dissolution of the CEC body and the constitution of a new, but now trilateral body: State Election Commissioner, Regulatory Commission and Complaints and Sanctions Commission (see section on Central Election Commission) and some changes in campaign financing (see section on election campaign financing).

Other important changes include the introduction of the use of technology in elections<sup>29</sup>; the regulation for materializing the right to vote for Albanian citizens with permanent residence abroad; provisions relating to the election campaign<sup>30</sup>, including those aimed at preventing the use of public resources for electoral gain; media coverage of the campaign<sup>31</sup>; amendments aimed at improving women's representation in politics (improving gender equality); determining the time periods within which elections may be held; the right of citizens to report violations of electoral legislation to the CEC; subsequent inspection of ballot papers and election material (so-called "election audit"), etc.

In addition to the above, the legal amendments also included transitional provisions, which allowed the extra-parliamentary opposition (whose MPs resigned from the seats won in the 2017 Assembly Elections) to be involved in the process of selecting members of the new bodies of the CEC and in the appointment of members of other levels of the election administration (Commissions of Electoral Administration Zones (CEAZs), Voting Centers Commissions (VCCs) and Ballot Counting Teams (BCTs).

Immediately after the agreement and signing of the Agreement of 5 June 2020, outside the text of the Agreement, and as agreed, the Assembly undertook another legislative initiative, the unilateral amendment of the Constitution of the Republic of Albania<sup>32</sup>. The draft law was submitted to the Assembly by a group of parliamentary opposition MPs<sup>33</sup>, while the country was in a state of natural disaster due to the Covid-19 epidemic. Reflecting on these constitutional changes, the Assembly subsequently adopted a second amendment to the Electoral Code on 5 October 2020<sup>34</sup>, again unilaterally and without any public consultation.

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<sup>&</sup>lt;sup>26</sup> Articles no. 2, 3, 4, 8, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 34, 44, 46, 47, 52, 53, 61, 62, 64, 67, 71, 76, 78, 79, 84, 85, 86, 87, 88, 89, 90, 91, 92, 92/1, 92/2, 92/3, 92/4, 92/5, 92/6, 92/7, 109, 123, 138, 146, 149, 163, 164, 172, 173, 175, 179, 180, 181, 182, 185 in the Electoral Code.

<sup>&</sup>lt;sup>27</sup> Ibid, Articles 123/1, 123/2, 123/3, 124/1, 167/1, 167/2.

<sup>&</sup>lt;sup>28</sup> Ibid., Article 44, "g". "c", 52 p. 1, 53 p. 3, 85/1, 163 point 6, 180/1.

<sup>&</sup>lt;sup>29</sup> Electronic voter identification, electronic voting and counting, which was piloted in an election administration area in Tirana, as well as the use of cameras during the voting process.

<sup>&</sup>lt;sup>30</sup> Prohibition of electoral subjects (including third parties) to organize events or charities during the election campaign, obligation of electoral subjects to clearly indicate in the propaganda materials who produced them, extension of the ban on advertising of public institutions four months before election day, etc.

<sup>&</sup>lt;sup>31</sup> The obligation of the media to clearly mark the ready-made material received from the electoral subjects as such, the transfer of the powers of media monitoring during the election campaign to the Audiovisual Media Authority (AMA).

<sup>&</sup>lt;sup>32</sup> Law No. 115/2020, dated 30.07.2020, "Constitution of the Republic of Albania", "For some changes to the Law no.. 8417, dated 21.10.1998, amended".

<sup>&</sup>lt;sup>33</sup> Group of deputies, draft act to amend the Constitution of the Republic of Albania, No. 1561 Prot., dated 05.06.2020.

<sup>&</sup>lt;sup>34</sup> Law No. 118, dated 05.10.2020, Electoral Code of the Republic of Albania, "For some changes and additions to law no. 10019, dated 29.12.2008, amended".

October' amendments of the Electoral Code aimed at modifying the voting methods for candidates, from voting to the party with closed and pre-established lists, to preference voting for list candidates. The Political Council resumed its work on September 14 with the object of these changes in the Electoral Code, however these changes never received the consent of the extra-parliamentary opposition, a fact for which the majority received criticism from both foreign actors, <sup>35</sup> as well as from the local ones<sup>36</sup>. The opposition argument, among other things, was that the changes were an excess of the June 2020 agreement, and the chosen mode did not really constitute the opening of the lists, as there is a minimum voting threshold for candidates to benefit from the rearrangement of the list because of the preferential votes (see section on the electoral system). They even demanded the discussion of the draft of the majority in the Political Council, proposing the opening of 100% of the lists to the preferential voting and not to touch the pre-election coalitions.<sup>37</sup>.

The President of the Republic of Albania was also involved in this confrontation between the parties. Although expressed strong criticism for amendment of the Constitution<sup>38</sup>, he decreed the act. Whereas, in the case of the approval of the second amendment of the Electoral Code, the President refused to decree it<sup>39</sup>. For this reason, the President submitted a request for assistance to the Venice Commission<sup>40</sup>. The latter indicated the acceptance of the request, but at the same time the impossibility of reviewing it with an expedited procedure.

The Democratic Conviction and the Albanian Democratic Movement appealed the specific changes that determine the rearrangement of candidates in the list only if they break the quotient in the Constitutional Court, which on June 30, 2021<sup>41</sup> overturned point 3 of Article 163 of the Electoral Code, as potentially incompatible with the Constitution, paving the way for fully open lists.

At the end of this amendment process, the Assembly of the Republic undertook several other minor amendments, agreed as necessary for the functioning of the new amendments to the Electoral Code, and especially the amendment of the Law "On Political Parties". This amendment undertaken by a majority MP, was considered as part of the Agreement of 5 June 2020 and in the framework of harmonization with the first changes made to the Electoral Code for financing of election campaign, but in the meantime this legal amendment suffered from fictitiousness in its consulting process. The Criminal Code was also amended<sup>42</sup> as well as the Law on Prosecution<sup>43</sup>, defining the obligation of the General Prosecutor and the Head of the Special Prosecution, according to the respective

<sup>&</sup>lt;sup>35</sup> Embassy of the United States in Tirana, Press release, dated 30.07.2020.

<sup>&</sup>lt;sup>36</sup> KRIIK Albania, <u>Public Statement</u>, dated 17.07.2020, "Breaking the political agreement and unilaterally modifying the Constitution, a very dangerous precedent for the democratic future of the country".

<sup>&</sup>lt;sup>37</sup> For more ABC News article: <u>"The opposition submits the draft to the Political Council: 100% open list and coalitions as they are"</u>, date 27 September 2020.

<sup>&</sup>lt;sup>38</sup> Press release of the President of the Republic, dated 30.07.2020.

<sup>&</sup>lt;sup>39</sup> Decree for the return for reconsideration of the President of the Republic, dated 23.10.2020.

<sup>&</sup>lt;sup>40</sup> Request to the Commission for Democracy through the Law by the President of the Republic, dated 21.10.2020, "Request for an Urgent Opinion on the process of unilateral and accelerated amendment of the Constitution and the Electoral Code of the Republic of Albania".

<sup>&</sup>lt;sup>41</sup> Constitutional Court of the Republic of Albania <u>Decision no. 28 dated 30.06.2021.</u>

<sup>&</sup>lt;sup>42</sup> <u>Law no. 146/2020</u>, dated 17.12.2020 "For some changes and additions to law no. 7895, dated 27.1.1995, "Criminal Code of the Republic of Albania", amended.

<sup>&</sup>lt;sup>43</sup> Law 148/2020, dated 17.12.2020, <u>Parliament of Albania</u>, "For some additions to law no. 97/2016 "On the organization and functioning of the Prosecution of the Republic of Albania".

jurisdiction, to provide information to the CEC on the investigation of criminal offenses in the field of elections.

As a result, the reform process resulted in the intervention of the Electoral Code, the amendment of the Constitution of the Republic, the Law "On Political Parties", the Criminal Code and the Law on the Prosecution. Apart from the mediation investment of the representatives of the country's strategic partners and the sacrifice of the institutional bed of political communication, not all these interventions received the consent of the opposition forces. This overturned the standard set and achieved in previous amendment processes, where unanimous agreement of the parties has prevailed. This criticism was also evidenced in the Opinion of the Venice Commission on constitutional changes.

Last year's legal amendments, despite bringing about changes which, if implemented in good faith, improve the legal framework for elections, failed to address or deal in depth the acute issues from which the country's elections have suffered. As such are mentioned the failure to guarantee a fully functional institutional and legal mechanism that guarantees transparency and control over the financing of electoral subjects <sup>44</sup>; failure to guarantee full transparency over candidates <sup>45</sup>; or the failure to fully regulate the voting of Albanians abroad and to charge the CEC with this task, which led to the failure of this process<sup>46</sup>.

Within the sacrifice of institutional beds, the process of public consultation on amendments to the electoral legislation last year saw further steps behind. First, the entire activity of the Political Council was a closed-door discussion and mostly without internal or external negotiators. This Council functioned without transparency for the public on the agenda of the discussions, without the publication of the minutes of the meetings and the contributions brought for discussion by the parties. Also, unlike the preliminary requirements<sup>47</sup>, the Council did not include the international expertise required as an accelerator for reaching agreement. The role of the expertise of the OSCE representation in assisting the Council's discussions remains particularly unclear.

On the other hand, the institution of the Assembly also ceded in the consultative process for the adoption of amendments to the electoral legal framework. Especially in the process of amending the

<sup>&</sup>lt;sup>44</sup> For more, see Open Letter KRIIK Albania "Consent for the reaching of agreement June 5, as a moment of leaderships to overcome the hitherto experience", June 16 2020.

<sup>&</sup>lt;sup>46</sup> See Press Conference of KRIIK Albania "Political and institutional actors to show readiness and willingness to increase the integrity of the electoral process for the Albanian Parliamentary Elections of April 25, 2021", March 11, 2021.

<sup>&</sup>lt;sup>47</sup> In a meeting with journalists dated 18.10.2019, Chairman of DP, Mr. Basha expressed the importance of international involvement in the reform process "(...) The mechanism should include three factors, the united opposition, those who have the keys to governance and the international factor, not as leaders but with the expertise [...] to prove the will of the parties to advance the process".

Constitution of the Republic of Albania<sup>48</sup> and the Law on Political Parties<sup>49</sup>, the consultative process suffered from lawlessness and fictitiousness.

The amendment of the Constitution was clearly contrary to the deadline of not less than 1 year from the date of the elections for making significant legal changes, provided by the Code of Good Practice for Electoral Affairs of the Venice Commission, while the expertise used by the summoned constitutionalists leave room for doubts on the objectivity and impartiality of the theoretical and practical treatment taken by them on the process and content of the amendments<sup>50</sup>.

Although sufficient time was available, and in conditions when it was more than clear that the 2021 elections would be organized in the context of a global health emergency as a result of COVID-19, neither the legislature nor the government undertook any specific initiative about necessary measures to guarantee an electoral process as normal as possible in the conditions of the pandemic, which would ensure, in addition to constitutional freedoms and rights, the protection of public health in the first place.

Not only that, but the pandemic and its effects are estimated to have been used by the majority for political advantage, such as, among other things, preventing Albanian citizens living in neighboring countries (especially in Greece) from exercising their right to vote. At its meeting on April 19, 2021, the Technical Committee of Experts decided that all individuals entering Albania from Greece or Northern Macedonia would have to isolate themselves for 14 days.<sup>51</sup>. The decision, as it was announced, was not based on increased risk due to the increase in infection rates in these countries<sup>52</sup>, but in the danger that might come from persons who would enter the country and who were expected to be in high numbers because of Orthodox Easter, which was celebrated a week later after election day, on May 2, 2021.

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<sup>&</sup>lt;sup>48</sup> The consultative process suffered from the extremely low participation of stakeholders, both civil society actors and those of the university sphere. Especially regarding the latter, only one representative from the academic world appeared at the session scheduled for participation. This is the exemplary evidence of the fictitiousness of the process, completed without any opinion from the academic sphere, i.e., by those who draft the legal doctrine or are the guardians of political-legal thought. Also, the situation is aggravated even more, when the weight of academic opinion was entrusted by the Assembly to only four summoned constitutionalists. Apart from no doubt about their expertise and individual values, it can not be thought that four or as many contracted professionals, discreetly appointed, will replace academic institutions. <sup>49</sup> The process, in terms of obtaining information and becoming transparent, only stated that it had consulted in a closed circle with very few organizations. KRIIK, meanwhile, although constantly following the electoral reform, was not informed nor invited to give its opinion, as it was the practice by the Assembly in several other previous processes.

<sup>&</sup>lt;sup>50</sup> In KRIIK's opinion, the process was not only fictitious and with significant legal violations, but also the consultative process, as it was carried out and defended by four constitutional experts, left room for strong doubts about their impartial treatment in defense of the socialist majority line. This suspicion is reinforced by the subsequent career development of these four constitutionalist experts, called in the capacity of independent and impartial experts. Specifically: (1) Ms. Elira Kokona, Deputy Secretary General of the Council of Ministers; (2) Mr. Ilir Rusmajli, is appointed in October 2020, with the support of the majority, as member of the Complaints and Sanctions Commission (KAS) in the Central Election Commission for a 9-year term; (3) Ms. Adea Pirdeni from September 2020 is appointed and serves as Deputy Minister of Justice of Albania, (4) Mr. Erind Mërkuri is appointed in November 2020 as a Member of the Disciplinary Commission of Private Bailiffs with a 4-year term.

<sup>&</sup>lt;sup>51</sup> <u>Technical Committee of Experts</u>: Back in high school classes, two-week quarantine for persons coming from North Macedonia and Greece, April 19, 2021.

<sup>&</sup>lt;sup>52</sup> Both Greece and Northern Macedonia have seen a steady decline in new cases since April 6. See: https://ourworldindata.org/coronavirus#coronavirus-country-profiles.

This decision of the Technical Committee constitutes a violation of the right of voters to vote and is not justified by the argument given, as it would be more reasonable that the deadline for the entry into force of the decision to restrict possible entry due to Easter to be decided after election day.

Public health institutions (Ministry of Health and Ad Hoc Technical Committee of Experts) were very slow, unmotivated, and not serious in addressing the rules that had to be followed regarding the holding of elections during the pandemic. During the election campaign period, there were two meetings of the Technical Committee of Experts. In both meetings, the restrictions on the movement of citizens in the time zones 22:00 to 06:00 were left in force, while none of their decisions provided for the establishment of facilities related to the movement of commissioners or observers engaged in the progress of electoral process<sup>53</sup>.

Also, the Order of the Ministry of Health restricting the gatherings of more than ten persons continued to be in force both on election day and during the counting process. The order was massively violated during the voting and counting process, as it was objectively impossible for it to be implemented<sup>54</sup>, as it was not possible to have less than ten people in a polling station, much less in a vote counting center.

The only act produced by the health authorities regarding the conduct of the electoral process in the conditions of the pandemic was a protocol approved by the Institute of Public Health, made public in the media only around April 20, while it bears the date April 13, as date of its approval. The protocol contained some instructions for conducting the electoral process, but in itself was unrealistic and ignored basic facts of the electoral process.<sup>55</sup>, making it frivolous. The day before election day, the Commissioner issued a minimalist instruction regarding the protection of public health which referred to the protocol approved by the IPH and required self-declaration on health concerns by commissioners and observers<sup>56</sup>, giving proper legitimacy to the act. But again, in substance, he remained an incomplete act, theoretical, delayed and no effect on some of his adjustments, moreover, that this guidance referred only to voting day and not the vote counting process.

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<sup>&</sup>lt;sup>53</sup> Given that commissioners or observers must be at polling stations for their opening at 6:00 am and, most likely, the process of closing polling stations and submitting election materials will not be completed in many cases before 22:00, all individuals engaged in the administration or observation of the electoral process will be in violation of established rules. Lack of public addressing of the issue and transparency by institutions for individuals involved in the process remains a major problem, at least as a non-law enforcement approach.

<sup>&</sup>lt;sup>54</sup> It is impossible to have less than 10 people gathered at the same time in a Polling Station and especially in a Vote Counting Center.

Suffice it to note that in each Voting Center the number of members of the Commission together with the technical operator is 8 people, while within the VC were accredited to be present the political observers of each of the electoral subjects and independent domestic or foreign observers.

The situation is more aggravated in the closed premises of the Vote Counting Centers where on average 28 people constituted only the group of members of the Commission for Election Administration Zone and the Vote Counting Teams, without considering here the considerable number of observers, media, etc.

<sup>&</sup>lt;sup>55</sup> For example, the protocol sets out some requirements for the premises in which voting centers are to be located, while the latter are finally set for March 15, 40 days before the election date.

<sup>&</sup>lt;sup>56</sup> Instruction no. 11, dated 24 April 2021 of <u>State Commissioner for Elections</u>, "On the implementation of anti-Covid 19 measures during the voting day for the Albanian Parliamentary Elections of April 25, 2021".

# III.2. Electoral System

The Assembly of Albania consists of 140 deputies, who are elected through a regional proportional system in 12 constituencies, the boundaries of which coincide with the administrative boundaries of the regions. The mandates for each constituency are determined based on the number of citizens and that each mandate should represent an approximately equal number of citizens.<sup>57</sup>.

Regulatory Commission determined the allocation of seats for each constituency for the 25 April 2021 elections in December 2020<sup>58</sup>, based on the number of resident citizens in different counties on 27 November 2020. Dibër and Gjirokastër counties lost one mandate each compared to the 2017 elections<sup>59</sup>, mandates, which were added to Tirana. Two regions deviate significantly from the average number of citizens for the mandate in the April 25 elections, Gjirokastra and Kukes, by 13.7% and 13%, respectively; however, this deviation is accepted to be in line with good election practices<sup>60</sup>.

Good practices, however, accept other ways of determining constituency mandates, such as based on the number of voters on the list, of voters currently voting.<sup>61</sup>, or even a combination of these methods. The analysis of the number of seats based on the number of voters on the list significantly disadvantages Gjirokastra voters in terms of representation, as this constituency deviates by 20% from the national average (one seat represents about 31,000 voters, from 25,634 voters / mandate which is the national average). Even more problematic is the situation if the number of seats is calculated based on the number of voters who have effectively voted specifically in these elections. In that case, there are five out of 12 constituencies that deviate by more than 10% from the average, two of which by more than 15%. This model goes in favor of the voters in Vlora and Shkodra, who are significantly overrepresented, while Dibra, Kukes and Tirana are disadvantaged<sup>62</sup>.

From the foregoing results that, regardless of the number of seats per constituency is in line with the best practices based on the number of citizens; if the number of voters or effective turnout is considered, the principle of equality of the vote is violated, and voters in different constituencies have diverse levels of representation in the Assembly. This is reinforced even more if we consider the high number of citizens living outside the territory of the Republic of Albania, who are calculated as a number for the distribution of mandates, but who de facto fail to vote, as they are not provided with this opportunity in their countries of residence.

It is estimated that a formula that is fairer in the division of seats between constituencies and guarantees equality of the vote can be considered. A model based on the number of citizens or voters but corrected based on the number of voters who have actually voted in a number of previous elections

<sup>&</sup>lt;sup>57</sup> Electoral Code of the Republic of Albania, Article 75, "Criteria and procedure for determining the number of mandates", point 1.

<sup>&</sup>lt;sup>58</sup> Decision no. 7, dated 11 December 2020, Regulatory Commission, "On determining the number of seats for each Electoral Zone for Assembly Elections of April 25, 2021".

<sup>&</sup>lt;sup>59</sup> Decision no. 173, dated 3 December 2016, Regulatory Commission, "On determining the number of seats for each Electoral Zone for Assembly Elections of 2017".

<sup>&</sup>lt;sup>60</sup> Code of Good Practice in Electoral Matters, Explanatory Report, point 2.2. "Equal voting power", 15, stipulates that the number of seats per constituency should rarely deviate by more than 10% from the average and in no case more than 15% from the average.

<sup>61</sup> Ibid.

<sup>&</sup>lt;sup>62</sup> See Annex B, Division of Mandates by Constituency.

would be fairer, especially considering that certain areas of the country have different moving demographics, whether inward or outward.

Political parties registered as electoral subjects must submit candidate lists for all constituencies. Mandates among electoral contestants are allocated according to d'Hondt formula<sup>63</sup>. Amendments to the October 2021 Electoral Code eliminated the possibility for political parties to run in pre-election coalitions<sup>64</sup>.

Only electoral entities that exceed the 1% threshold of valid votes won nationwide benefit from the distribution of seats, which, as expected, was an insurmountable barrier for candidates nominated by voters, especially those running in constituencies with lower number of voters<sup>65</sup>.

The Electoral Code should address the legal threshold for independent candidates, in order to create real opportunities for them to run as electoral contestants.

The mandate allocation formula gives priority to parties with more votes than those with fewer votes, unless the latter are concentrated in a few constituencies, in which case the country is divided into several ones. This clearly happened in the April 25 elections, where the two parties with the lowest number of votes, the Socialist Movement for Integration, and the Social Democratic Party, have a negative ratio between votes and seats. The SMI, with 6.8% of the national vote, won only 2.9% of the seats in the Assembly<sup>66</sup>. Meanwhile, the Social Democratic Party, which was the fourth electoral subject by number of votes, had an almost perfect ratio between votes and seats (2.1% of seats with 2.2% of votes<sup>67</sup>), but still a negative report. PSD votes were concentrated in the two constituencies in which it received mandates (Tirana and Shkodra), with 83.7% of the votes received only in these two constituencies; while the SMI had a much more homogeneous distribution among constituencies<sup>68</sup>, which explains the considerable difference between these two parties. Both parties with the most votes (PD and SP), in contrast, had a positive ratio between votes and seats, namely, the SP received 52.9% of seats with 48.7% of votes<sup>69</sup>, while the DP 42.1% of seats with 39.4% of the vote<sup>70</sup>.

The d'Hondt method of allocating seats and the legal threshold of 1% bring in a number of votes that do not produce seats. In total, across the country 92.1% of the votes are represented (they produced mandates) and 7.9% of the votes did not produce mandates. The difference between the constituencies (regions) in the number of votes that did not produce mandates remains problematic. The regions with the highest percentage of votes that did not produce a mandate are Gjirokastra, with 28.2% and Dibra

<sup>&</sup>lt;sup>63</sup> Electoral Code of the Republic of Albania, Article 162 "Calculation of electoral subjects' seats"

<sup>&</sup>lt;sup>64</sup> This also led to a change in the formula for the division of seats, which with the previous Electoral Code used the Sainte-Laguë formula for the division of seats within coalitions.

<sup>&</sup>lt;sup>65</sup> The independent candidate who received the highest percentage of votes was Bojken Abazi (0.19%), who ran in Tirana where there is also the highest concentration of population and voters (about 29.5% of voters who voted in this election voted in Tirana).

<sup>&</sup>lt;sup>66</sup> Report 0.42.

<sup>&</sup>lt;sup>67</sup> Report 0.95.

<sup>&</sup>lt;sup>68</sup> In all three constituencies where the SMI won seats, it had only 46.8% of the votes.

<sup>&</sup>lt;sup>69</sup> Report 1.09.

<sup>&</sup>lt;sup>70</sup> Report 1.07.

with 24.8%. Meanwhile, Tirana and Fieri are the regions with the lowest number of votes that did not produce a mandate (respectively 6.1% and 6.2%) (for the full picture of unrepresented votes by constituencies and electoral subjects, see Appendix C).

Unilateral constitutional changes of July 2020, followed by amendments to the Electoral Code in October of the same year<sup>71</sup> brought the novelty of the possibility for voters to vote, in addition to the electoral subject also for one of the candidates of that subject<sup>72</sup>. However, it cannot be said that this change brought open lists, even though voters were granted preferential voting rights. This is because, in order for a candidate to change ranks on the list of the relevant party under preferential cumulative vote should take a number of votes at least as the quotient arising from the division of the number of votes received by the number of mandates the subject had won<sup>73</sup>. Only 18 candidates managed to break this quotient, 13 SP and 5 DP-AN (see Annex E).

Candidates with the number of preferential votes higher than the quotient replaced candidates on the list with the lowest number in the preliminary rankings, unless the candidate who benefit from re ranking was the gender most represented and the candidate who will be replaced by gender less represented, in which case the candidate was replaced with the one immediately above him in the list. The effects of this reshuffle method were almost nil, with only three candidates benefiting from the reshuffle as they were no longer on the winning list of respective party, two from the SP and one from the PD-AN. Meanwhile, if there were no conditions for the re-ranking of candidates and the lists were totally open, 24 of the current candidates (17.1%)<sup>74</sup> would not be members of the next Assembly but would be replaced by candidates with more votes (see "Annex F", candidates who would not have been mandated if the lists were totally open and who would replace them (ranking by subjects electoral).

Positively, the candidates in the non-winning list are ranked according to the number of preferential votes and, consequently, in case of replacement of the deputies who leave the mandate, the candidate in the queue who receives the mandate is the candidate who received the highest number of preferential votes and not the candidate placed above by the respective party.

After the decision of the Constitutional Court, it is expected that the allocation of seats within the party lists will be reviewed by the new Assembly. If the forthcoming legal changes preserve the preferential voting, the allocation of mandates will have to really reflect the preferences of the voters<sup>75</sup>, without fictitious legal barriers that undermine representation.

<sup>&</sup>lt;sup>71</sup> Law No. 118, dated 05.10.2020, "For some changes and additions to law no. 10019, dated 29.12.2008, "Electoral Code of the Republic of Albania" amended".

<sup>&</sup>lt;sup>72</sup> The system was with completely closed and fixed lists.

<sup>&</sup>lt;sup>73</sup> In any case, the provision stipulates that the quotient cannot be more than 10 000. For the quotient, according to constituencies and electoral subjects, see Appendix D.

<sup>&</sup>lt;sup>74</sup> Twelve from PD-AN, eight from SP, two from LSI and two from PSD.

<sup>&</sup>lt;sup>75</sup> During these elections it turned out that the interest of voters for individual candidates, except for the political party, is high (over 70%), especially among voters of parties that have won seats in the Assembly. For more see Annex G "Percentage of votes that have expressed a valid preference for candidates".

## IV: ELECTION ADMINISTRATION

The election administration consists of three levels, the Central Election Commission (CEC), which is the first level responsible for organizing, administering and supervising the process; Commissions of Election Administration Zone (CEAZs), which are commissions that are established and function three months before election day until the end of the counting process, and that are responsible for organizing the process at the level of the electoral administration zone; as well as Voting Center Commissions (VCCs), which administer the voting process on election day at voting Centers set up. The counting of votes is centralized, the votes are counted by the Vote Counting Teams (VCTs), at the Vote Counting Centers (VCCs), under the supervision of the CEAZs. For the elections of April 25, 2021, 92 Electoral Administration Zones (EAZs) and 5,199 Voting Centers (VCs) were established.

All administrative links in the organization of the electoral process are composed of members nominated by political parties, always considering the balance of political representation in the Albanian Parliament. The only exception is the CEC, whose governing bodies are elected through a procedure which, at least *de jure*, is not directly conditioned by the proposals of political parties.

All the above-mentioned commissions, regardless of how they are formed and duration of their functioning, must fulfill their functions, in accordance with the law, in an impartial and transparent way.<sup>76</sup>.

# IV.1. Central Election Commission (CEC)

The Central Election Commission is the institution responsible for the organization and administration of elections and referendums, which directs and supervises the activity of the election administration, monitors the activity of electoral subjects, state bodies and institutions and the media in relation to the elections, as well as resolves administratively requests, or complaints related to the electoral process<sup>77</sup>.

After legal amendments<sup>78</sup>, which reflected the Political Agreement of 5 June 2020, the CEC institution was remodeled into an institution with a trilateral leadership structure: State Election Commissioner (Commissioner); The Regulatory Commission (Regulator), which consists of 5 members and the Complaints and Sanctions Commission (KAS), consisting of five members.

It is worth noting the continuing approach of the closely agreed political will of the two largest parties to strip the CEC of its competencies from one electoral reform to another, from the institution "permanent body that prepares, supervises, directs and verifies all aspects related to elections "as provided for in the Constitution adopted by popular referendum in 1998, in a state institution in charge

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<sup>&</sup>lt;sup>76</sup> Electoral Code of the Republic of Albania, Article 3, "General Principles", point 6.

<sup>&</sup>lt;sup>77</sup> Electoral Code of the Republic of Albania, Article 12, "Composition and Functioning of CEC", point 1.

<sup>&</sup>lt;sup>78</sup> Law no. 101/2020 dated 23.7.2020 "Electoral Code of the Republic of Albania", "For some changes and amendments in law no. 10 019, dated 29.12.2008, amended", Official Gazette No. 143, dated 4 August 2020.

of administering elections, in accordance with the rules set out in [...] The Code<sup>79</sup>", as currently provided. Even, with the unilateral amendments undertaken by the majority on October 5, 2020, the phrase that defined it as "the highest permanent state body" was removed.

Although reformatting of the CEC should have been a step towards the establishment of an independent institution, also reflecting the spirit of the political agreement of 5 June 2020, KRIIK notes that political influence and affiliation was present in behavior, and often in voting of the membership of the Regulator and KAS. The members of the Regulatory Commission, despite the decision by consensus on any decision adopted before election day, also reflected clearly politically affiliated behavior in their discussions during public meetings<sup>80</sup>.

Meanwhile, this behavior was even more prevalent in the KAS, where in almost all issues addressed, both before<sup>81</sup> and after election day in the appeals of election results and in the treatment of other issues, a biased political decision-making was observed, often incorrect and extralegal, and with an open discretion in favor of the ruling majority.

Throughout its life, the three governing bodies of the CEC reflected a behavior that was not that of a single institution, but as three of them, with separate functions almost totally independent of each other.

Drafting and approval of the "Orientation Plan of the CEC" to better organize, administer and control the electoral process, has been a positive practice built on the basis of an act adopted continuously throughout the previous electoral processes starting from year 2005. The approval of this orientation action plan constituted a basic document, especially for the administration and activity of the CEC, in accordance with the legal provisions. For this election process, this plan was not drafted.

In the judgment of KRIIK, even though during the previous electoral processes no precise implementation of this plan has been ascertained, the adoption of such an act helps to better organize the work in accordance with the legal obligations and deadlines. On the other hand, it constitutes a more concise basis of legal tasks by encouraging the administration itself and better coordinating the steps with other actors involved in the process, increasing, among other things, further transparency on the activity of the institution and the entire electoral process.

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<sup>&</sup>lt;sup>79</sup> Electoral Code of the Republic of Albania, Article 2, "Definitions", point 7.

<sup>&</sup>lt;sup>80</sup> The most recent was the last of meeting of the Regulator for the approval of final election results, where two members, namely those proposed by the opposition, described the elections associated with several serious of problems, based on which they decided to vote against the draft act. Meanwhile, the other three members of this commission, namely those proposed by the majority, described the elections of April 25, 2021, as the best process ever conducted in the country, voting in favor, and approving the draft act.

<sup>&</sup>lt;sup>81</sup> Specifically in the issues reviewed on the use of state resources and the approval of the ballot.

# IV.1.1. Functions of the Governing Bodies of the CEC and the selection of their membership

**State Election Commissioner** (SEC) is a monocratic body that exercises executive powers, directs the CEC administration, and represents the CEC in relations with third parties. The Commissioner has a seven-year, renewable term.

**Deputy Commissioner**, who is responsible and directs the implementation of the electronic voter identification project, has equal powers with the Commissioner for the selection, monitoring and implementation of electronic voter identification technology, as well as for the selection, recruitment, and training of election officials. The mandate of the Deputy Commissioner is four years.

**The Regulatory Commission** (Regulator), operates on a part-time basis, consists of five members, where one of them exercises the duty of the Chairman, and is the competent body for the adoption of normative acts in the field of elections and the establishment of rules for elections. The mandate of the members of the Regulator is five years.

The Complaints and Sanctions Commission (KAS), operates on a part-time basis, consists of 5 members and is the competent body for reviewing administrative complaints and imposing sanctions for violations of the electoral law. The mandate of the members of the KAS is nine years. After four years from the election of the body for the first time, in October 2024, the mandate of the three members who will be appointed by draw ends. New members are elected for a nine-year term. The draw for the appointment of three members will be cast no later than one month before the end of the four-year term. Members who are relieved of duty have the right to rerun<sup>82</sup>.

The Commissioner, the Deputy Commissioner, the members of the Regulatory Commission and the Complaints and Sanctions Commission are elected by the Assembly of the Republic of Albania, setting up a Special Parliamentary Commission to carry out the process of interviewing and their preliminary selection. The Assembly announced the call for applications for members of the three governing bodies of the CEC<sup>83</sup> on August 29, 2020. At the end of the application process<sup>84</sup>, 26 candidacies were submitted to the Assembly for the position of State Election Commissioner; 15 candidacies for the position of State Deputy Election Commissioner; 47 candidacies for members of the Regulatory Commission and 48 candidacies for members of the Complaints and Sanctions Commission<sup>85</sup>. In the plenary session of September 17, 2020, the Albanian Parliament set up<sup>86</sup> Special Parliamentary Commission, which was charged with reviewing, interviewing, and evaluating candidacies.

The composition of the Commission ensured the participation of the parliamentary majority and minority, also ensuring, in the spirit of the Agreement of 5 June 2020, the representation of the extra-

<sup>&</sup>lt;sup>82</sup> Electoral Code of the Republic of Albania, Article 183, "Transitional establishment of steering bodies and election administration", point 7.

<sup>&</sup>lt;sup>83</sup> The Assembly of Albania, dated 29.08.2020, Announcement for the opening of the application procedure for vacant positions in the Central Election Commission.

<sup>84</sup> Dated September 18, 2020.

<sup>&</sup>lt;sup>85</sup> A part of the candidates submitted applications for more than one position. A total of 70 individuals applied.

<sup>&</sup>lt;sup>86</sup> <u>Decision no. 50/2020</u> "On the establishment and composition of the Special Parliamentary Commission for the review and selection of candidacies for the governing bodies of the Central Election Commission: State Election Commissioner, State Election Deputy Commissioner, Regulatory Commission and the Commission of Complaints and Sanctions".

parliamentary opposition<sup>87</sup>. After conducting hearings, at its meeting on October 2, 2020, the Commission issued a decision<sup>88</sup> regarding the candidates that were proposed Parliament for review and approval<sup>89</sup>.

The selection process did not follow the spirit provided in the Code for a proper selection and interview process, and then the evaluation on the scoring done to each candidacy. Moreover, the legal provision of criteria and limitation of candidates mainly by individuals coming from the ranks of former political officials or cabinets, former senior management officials, or former leaders of non-profit organizations with activities in the field of elections and of human rights, gave the perception that the selection would be conducted on political preferences.

In KRIIK's judgment, the inclusion of former political officials, or even former cabinet officials, along with individuals allowed to run is not in the spirit of the aspiration for an impartial and politically independent election administration and leaves room. for the selection of political candidates. Although the Electoral Code has included guarantees, seemingly, regarding the possibility of eliminating political candidates, these guarantees are not sufficient as long as there is no clear and detailed procedure of the selection mechanism, to which the Special Parliamentary Commission must obey. As long as this procedure is clearly unregulated, as happened in the case of the selection of candidates in October 2020, the possibility remains open that the will of the parties will prevail over the spirit of the law and the letter of the law will be misused, and, consequently, in irreparable damage to the Central Election Commission's aspiration for independence and impartiality<sup>90</sup>, as evidenced in this election process.

<sup>&</sup>lt;sup>87</sup> According to the provisions of article 183 and point IV of Decision no.50 / 2020, dated 17.09.2020 of the Assembly ... "Selection of candidacies according to law no. 10019, dated 29.12.2008 "The Electoral Code of the Republic of Albania", as amended, is made in the presence of the authorized representative, in the capacity of special envoy, of the parliamentary parties that emerged from the general elections of 2017, which have lost parliamentary representation". According to this determination in the meetings of this Commission was present as an authorized representative Mr. Oerd Bylykbashi.

<sup>&</sup>lt;sup>88</sup> <u>Decision no. 2. dated 2.10.2020</u> "For the selection of candidates for the governing bodies of the Central Election Commission: State Election Commissioner, State Election Deputy Commissioner, Regulatory Commission and the Commission of Complaints and Sanctions".

<sup>&</sup>lt;sup>89</sup> <u>Decision no.56/2020 dated 5.10.2020</u> The Assembly elected the State Election Commissioner Mr. Ilirjan Celibashi. 57 Minutes of the Special Parliamentary Commission on the Selection of Candidates dated 28 September, 29 September, and 30 September 2020.

<sup>&</sup>lt;sup>90</sup> The aspiration for an independent electoral administration has been continuously discussed during the electoral reforms of recent years. According to the previous formula of composing the membership of the Commission, the chairman should be an independent candidate. This aspiration, which never managed to be fully fulfilled, was finally destroyed in May 2017, when as a result of a political agreement between the leaders of the majority and the opposition, Mr. Rama and Mr. Basha, then chairman of the CEC, Mr. Denar Biba, elected as independent by the Assembly just a few months before the 2017 elections, changed seats with Deputy Speaker Mr. Klement Zguri, who was elected to the CEC proposed by the second parliamentary minority party, the Republican Party. This castling of the chairman and deputy chairman was the *de jure* acceptance of what, *de facto*, had become known at the time, that the chairman of the CEC was a representative of the majority, under the guise of an independent candidate.

# IV.1.2. Functions of the Central Election Commission

# IV.1.2.1. State Election Commissioner

The commissioner generally administers the elections efficiently and transparently. The decisionmaking of the Commissioner was made in both public and non-public hearings. In view of the elections of April 25, 2021<sup>91</sup> the Commissioner adopted 402 decisions<sup>92</sup> and 16 directives<sup>93</sup>, in either public or non-public hearings. Thirty-four decisions of the Commissioner<sup>94</sup> were appealed to the Complaints and Sanctions Commission (CSC), which has decided the full or partial change for 17 of them. Despite the fact that the decision-making of the Commissioner in non-public hearings is in accordance with the legal framework, KRIIK (Coalition for Reforms, Integration and Consolidated Institutions) estimates that for an increased transparency of the process, it would have been necessary that all decisions of the Commissioner be taken in open public hearings.

In general, the decision-making of the CEC (Central Election Commission) was transparent and regularly published on the institution's website. The regular and timely publication on the website of the preliminary materials of the meetings, which was a problematic issue in previous electoral processes, is regarded as a positive step in the function of transparency.

Furthermore, throughout the preparation stage, the Commissioner has consistently demonstrated an open and cooperative approach to the stakeholders involved in the process, the media and the civil society organizations.<sup>95</sup>.

The occasional public statements of the Commissioner are positively assessed, even in the open meetings with journalists, in order to show transparency. Also, the public was fully informed on the progress of the process, especially regarding the public calls to political parties as well as the law and the duties of the actors in the electoral process.

One of the most important decisions taken by the Commissioner was the approval of the contents of the ballot paper, after the declaration of incompetence by the Regulatory Commission<sup>96</sup>.

Despite the delay in the adoption of this decision, the effort and consistency of the Commissioner's behavior to reach a preliminary consensus with the political parties before the adoption of the decision

<sup>&</sup>lt;sup>91</sup> In addition to the activities related to the Parliamentary Elections of April 25, during the period covered in the given report, the Commissioner has taken a number of decisions regarding law 138/2015 (Law on Decriminalization). Pursuant to this law, the Commissioner took 90 decisions, filling the vacancies notified by the Municipal Councils and the Assembly of Albania, or the results of the verification forwarded to the CEC by the General Prosecution Office have been reviewed. Other decisions are related to various issues, such as the distribution and auditing of annual funds of political parties, the budget structure of the calendar year, requests from NPOs for various initiatives, etc.

<sup>&</sup>lt;sup>92</sup> Fifteen decisions were adopted during October-December 2020.

<sup>&</sup>lt;sup>93</sup> A directive was adopted during October-December 2020.

<sup>&</sup>lt;sup>94</sup> Ten decisions are related to appeals against the election result and seven decisions are related to sanctions against members of several Commissions of Electoral Administration Zones, i.e., they are the same object of appeal.

<sup>&</sup>lt;sup>95</sup> The Commissioner has regularly held consultative meetings with civil society stakeholders, information meetings with the media, and has shown willingness to cooperate and communicate with competing political actors in the process.

<sup>&</sup>lt;sup>96</sup> Decision no. 12, dated 31.03. 2021, the Regulatory Commission, "On the declaration of incompetence of the Regulatory Commission for the review of the draft decision for the approval of the content of the ballot paper for the Albanian Parliamentary Elections of April 25, 2021".

is appreciated. The same can be said on the right decision-making<sup>97</sup> in full compliance with the spirit and wording of the Constitution and the Electoral Code.

In addition to the positive and improved aspects in terms of administration, not only by the Commissioner but also the CEC administration, there were issues on which the Commissioner, based on KRIIK, should have shown a more proactive attitude, especially regarding the fulfilment of functions in several recently amended legal framework mechanisms aimed at addressing the use of public resources for electoral purposes, conducting media during the campaign, or monitoring election campaign activities, with the aim of strengthening control over election campaign financing.

Regarding the use of public resources, a passive attitude of the Commissioner and the CEC administration was observed, especially with regard to the problems observed in the process of reporting activities by state institutions in the interface created specifically for this issue.

Since the approval of the decision<sup>98</sup> which made such reporting mandatory, the CEC has not taken any measures for non-timely reporting, lack of reporting, or lack of reporting details by institutions.

Reporting on the state institutions activities during the campaign, in the final analysis, proved ineffective in addressing the misuse of public resources or public offices in the campaign.

With regard to other aspects aimed at preventing the use of public resources, as a result of the denunciations made to the CEC, the Commissioner took only four<sup>99</sup> administrative measures with penalties, two of which<sup>100</sup> were invalidated by the Complaints and Sanctions Commission (CSC). In addition, for another case, after finding a violation, the Commissioner decided<sup>101</sup> that an administrative sanction be taken by the Complaints and Sanctions Commission (CSC), which in turn rejected<sup>102</sup> such a request.

The Audiovisual Media Authority monitored the media during the election campaign and submitted daily and weekly reports to the CEC, identifying several violations for which the CEC was required to take legal action. The Commissioner considered only two weekly reports from the Audiovisual Media Authority, one during the campaign and one after the vote counting process was completed.

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<sup>&</sup>lt;sup>97</sup> In the decision-making of the Commissioner regarding this essential part of the process, the result of a survey conducted on the social networks of the CEC was taken into account.

<sup>&</sup>lt;sup>98</sup> Decision no. 9 dated 24.12.2020, Regulatory Commission "Rules for reporting activities of public character of each public institution, with state capital, agencies, state entities, categories of prohibited activities, as well as monitoring the activity, behavior and use of human resources, financial and logistical aspects of the state administration before the elections".

<sup>&</sup>lt;sup>99</sup> Decision no. 7, dated 14.01.2021 of the State Election Commissioner imposing an administrative sanction with a penalty against Mr. Arben Qalliu acting in the quality of the Director of the Local Directorate of the State Cadaster Agency of Lushnjë.

Decision no. 46, dated 09.02.2021 of the State Election Commissioner imposing an administrative sanction with a penalty on Mr. Erion Veliaj acting in the quality of the mayor of Tirana.

Decision no. 234, dated 14.04.2021 of the State Election Commissioner imposing the administrative sanction with a penalty against Mr. Gentian Picari, acting in the quality of the mayor of Vora, in the amount of 10 000 (ten thousand) ALL.

Decision no. 452 dated 21.09.2021 of the State Election Commissioner imposing an administrative sanction with a penalty against the School Director of Shëmri Kukës in the amount of 5 000 (five thousand) ALL.

<sup>&</sup>lt;sup>100</sup> CSC overturned the administrative measure against Mr. Qalliu with decision no. 4, dated 22.01.2020. CSC overturned the administrative measure against Mr. Veliaj with decision no. 6, dated 16.02.2021.

Decision no. 467 dated 11.11.2021 of the State Election Commissioner found violations by the administrator of the Administrative Unit no. 2 Tirana and requested the CSC to impose an administrative sanction.

Decision no. 115 dated 21.12.2021 "On the review of the request of the State Election Commissioner no. 01, dated 17.12.2021 addressed to the Complaints and Sanctions Commission, for imposing an administrative sanction".

Even after reviewing<sup>103</sup> the final report, the sanction<sup>104</sup> was about the violation of the election silence, which overruled any other violations found by the AMA during the campaign.

The CEC's role was reduced to the periodic publication of daily reports following their submission and their non-review in a shorter period, making the regulatory framework inefficient and failing to guarantee the primary purpose of the media oversight mechanism: to inform the public impartially and objectively during the campaign.

The short period of time of the election campaign, as well as the lack of timely and frequent review of reports, resulted in a lack of compensation in television time of electoral subjects under-represented in the media, and, as a result, a one-sided and unequal media campaign between electoral competitive subjects.

The publication of campaign monitoring reports on the CEC website has been almost non-existent in general and totally absent during the election campaign, which has led to reduced transparency over a mechanism that has been inefficient since its beginning.<sup>105</sup>

Following the obligations set out in the amendments to the Electoral Code in July 2020, the implementation of bylaws to guarantee the right of immigrants to vote was entrusted to the Central Election Commission.

Despite the fact that the CEC tried to fulfil this obligation, starting the process with the establishment of the Working Group and a continuous communication with the General Directorate of Civil Status (DPGJC) and the political forces, it publicly concluded that this process could not be realized due to the lack of political agreement, which in the opinion of the Commissioner, was required for the realization of the given project.

In any case, the time available to the CEC to carry out this process, taking into account all other administration aspects, was extremely limited. The non-inclusion of out-of-country voting in the usual voting procedures during these elections removed the possibility that in the next elections this voting would automatically become an integral part of the voting procedures, which means that out-of-country voting in full can be done in the next parliamentary elections.

### IV.1.2.1.1. Delivery of mandates

On June 23, with Decisions 406 to 417<sup>106</sup>, the State Commissioner for Elections decided to distribute the nominal mandates for the candidates for the Parliament of Albania, based on the election results.

The distribution of mandates encountered problems, as a result of the resignation from the mandate of the Chairman of the Social Democratic Party, Mr. Tom Doshi, immediately after the Election Day.

<sup>&</sup>lt;sup>103</sup> Decision no. 370, dated 27.05.2021 of the State Commissioner of Elections "Review of the summary report monitoring the coverage of the election campaign by the Audiovisual Media Service Providers (OSHMA) for the time period 26.03.2021 - 23.04.2021, as well as the monitoring of the period of election silence".

<sup>&</sup>lt;sup>104</sup> The Commissioner decided to take the administrative measure for RTSH, a penalty in the amount of 2,000,000 (two million) ALL, after RTSH 2 and RTSH Kukësi had broken the election silence.

<sup>&</sup>lt;sup>105</sup> As of April 23, 2021, 96 monitoring reports were published on the CEC website, covering the period from March 1 to March 20, 2021. Sixty-three were the first reports and only 33-second monitoring reports.

<sup>&</sup>lt;sup>106</sup> Decisions of the State Election Commissioner, Central Election Commission.

The chairperson of (Social Democratic Party of Albania) PSD submitted the list of candidates for the given electoral subject in two electoral districts of the country, Tirana and Shkodra.

Despite the fact that the Albanian legal framework does not provide for resignation from the candidacy, and even sanctions that the ranking of candidates on the list can no longer be changed, after the moment of registration of the list by the CEC<sup>107</sup>, the Commissioner decided to consider the resignation letter submitted to CEC by Mr. Doshi and not to include this candidate in the distribution of mandates.<sup>108</sup>

Despite the fact that the Albanian legal framework does not provide for resignation from the election process, and even sanctions regarding the ranking of candidates on the list which can no longer be changed, after the moment of registration of the list by the CEC, the Commissioner decided to consider the resignation letter submitted to CEC by Mr. Doshi and did not provide a mandate for the given candidate.

In the reasoning regarding the electoral mandate of Mr. Doshi, the Commissioner did not cite the Albanian legal framework, but the International Covenant on Civil and Political Rights and Freedoms and ruled that according to this Convention an individual cannot be forced to take the mandate.

KRIIK deems that the reasoning used by the Commissioner is in excess of domestic legal norms and that the use of the Convention on Civil and Political Rights and Freedoms cannot be used as an argument in this case. Article 25 of the Convention sanctioned the right of citizens to participate in the government of their own country, including the right to run in elections. The Convention does not detail the right of non-participation. On the other hand, KRIIK notes that, due to last year's legal amendment giving party leaders the right to run in more than one electoral district, the Commissioner was de facto unable to distribute PSD seats in Shkodra and Tirana, in the absence of the will expressed by Mr. Doshi regarding the decision on his mandate. KRIIK deems that the reasoning used by the Commissioner is in excess of domestic legal norms and that the use of the Convention on Civil and Political Rights and Freedoms cannot be used as an argument in this case.

However, the distribution of mandates for the PSD in Shkodra and Tirana created different standards in the delivery of mandates, since in case of loss of mandate by one deputy, the next deputy in list who receives the mandate is not determined by the political party's preliminary ranking in the candidates' list, as in the initial distribution, but based on the number of votes won. This was the case in delivering mandates to the deputies who entered the Assembly after its first hearing upon the

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<sup>&</sup>lt;sup>107</sup> Electoral Code of the Republic of Albania, Article 67, List of candidates of parties and coalitions of parties" point 5.
<sup>108</sup> See decision no. 409, dated 23.06.2021 "On the distribution of mandates among electoral subjects and the determination of the winning candidates in the electoral zone of the district of Tirana, regarding the elections for the Assembly of the Republic of Albania on 25.04.2021" and decision no. 410, dated 23.06.2021 "On the distribution of mandates among electoral subjects and the decision on the winning candidates in the electoral zone of the region of Shkodra, for the elections for the Assembly of Albania on 25.04.2021" of the Commissioner.

resignation of four deputies elected before the start of the new Statute of the Assembly<sup>109</sup>. In case Mr. Doshi would have taken the mandate and then resigned, the candidate who would replace him in the Assembly would not be determined by the initial ranking in the PSD list but by the re-ranking based on the number of votes preferences taken by the candidates<sup>110</sup>.

On the other hand, beyond the actions of the Commissioner, in the KRIIK trial, the withdrawal of Mr. Doshi from the mandate not received is contrary to public responsibility, that a person who seeks to be mandated by citizens as a member of the Assembly, must manifest. The candidate for deputy assumes a public and civic responsibility, first in front of his constituents and then in front of the legislation. By resigning from the mandate without receiving it, Mr. Doshi has shown a lack of public responsibility towards the Albanian voters.

## IV.1.2.2. The Regulatory Commission (The Regulator)

The Regulatory Commission reviews and approves drafts of a normative nature, prepared by the CEC administration or its members, such as the boundaries of the electoral administration zones, the number of mandates for each electoral zone, the rules for the use of technology systems or equipment, information, guides and manuals in the service of the election administration, rules for financial reporting of electoral subjects, rules for reporting public activities of public institutions, rules for media monitoring methodology, etc<sup>111</sup>.

The Regulatory Commission was summoned for the first time on October 26, 2020, a meeting during which the regulation for its organization and functioning was approved. In total, in order to organize the electoral process, the Regulatory Commission held 30 meetings and adopted 33 decisions and 2 instructions.

The Regulatory Commission takes decisions by qualified majority (4/5) on issues related to the approval of drafts of a normative nature, as well as on the demarcation of electoral administration zones, the use of technology in elections, and voting of citizens residing abroad. Meanwhile, decisions regarding the distribution of seats in constituencies and the certification of the final election result can be taken by a simple majority (3/5).<sup>112</sup>.

<sup>&</sup>lt;sup>109</sup> Gramoz Ruçi, elected in Fier from the list of SP; Mark Marku, elected in Lezhë from the DP-AN list; Najada Çomo, elected in Tirana from the list of Socialist Party and Lefter Koka, elected in Durrës from the list Socialist Party.

<sup>&</sup>lt;sup>110</sup> Electoral Code of the Republic of Albania, Article 163 "Separation of mandates within the coalition", point 7 and article 164 "Termination of mandate and replacement of vacancy", point 2.

Electoral Code of the Republic of Albania, Article 20 "Competencies of the Regulator" (as amended by law no. 101/2020, dated 23.07.2020).

<sup>&</sup>lt;sup>112</sup> At the same source.

The decision-making was unanimous<sup>113</sup>, despite the discussions by the members of this commission, in some cases even off the agenda, which clearly reflected positions<sup>114</sup> in line with the political positions of the electoral subjects.

It is noted that the Regulatory Commission maintained a generally unified position during public meetings, while when disagreements were observed or there were different positions by the members, a break was taken to make the relevant discussions not public. In fact, in one case<sup>115</sup>, the whole discussion took place in a private meeting, and only the final adoption of the act took place in a public meeting.

Except in violation of the Statute<sup>116</sup> of the Regulatory Commission, according to which its meetings are public, such an approach is also in contradiction with the spirit of transparency to the public that the election administration must manifest.

KRIIK considers that any discussion of the commissions in the CEC should be public, in order to increase the trust of the citizens in the administration of the election process.

## IV.1.2.2.1. Incompetency for the approval of the contents of the ballot paper

One of the cases of political influence on the positions of the members of the Regulatory Commission is the avoidance of the obligation to approve the ballot paper template by this Commission, an issue on which the political parties had diametrically opposed positions, which were then resolved in the Electoral College.

The law recognizes the competence of the Regulatory Commission to approve the security elements of the ballots, an obligation which was fulfilled by the Regulator on February 26<sup>117</sup>. Based on the given legal obligation, the Commissioner submitted for review and approval to the Regulatory

<sup>&</sup>lt;sup>113</sup> In addition to the decision approving the final election result.

The two members of the Regulatory Commission, Mrs. Helga Vukaj and Mr. Muharrem Caka, have continuously raised the concern about the passive attitude of the CEC regarding the use of public resources, as well as the non-reaction of the CEC on the issue of publishing the citizens' database.

<sup>&</sup>lt;sup>115</sup> The approval of the manual of Commissions of Electoral Administration Zone (KZAZ) and Vote Counting Staff (GNV) (sessions of 9 and 20 April 2021), was an issue that was accompanied by debates during the session for the discussion of these projects. This is due to the proposal of two draft acts by the administration, where the second model, according to her, was considered as an act with the same content as the first, but with only some technical changes. This change of acts was considered to be not serious by two members of the Regulatory Commission, who requested the presence of the Commissioner to clarify the situation, regarding the determination of the act that should be considered by the Regulatory Commission.

The Commissioner withdrew both drafts proposed by the administration following the resumption of the procedure by the administration for the proposal and approval of the draft act. The attitudes of the two members of the Regulator showed a high level of distrust towards the CEC administration.

Decision no. 1, dated 26.10.2020. Approval of the regulation for the organization and functioning of the Regulatory Commission "Article 20 "Meetings of the Regulatory Commission", point 5.

Decision no. 6, dated 26.02.2021, Regulatory Commission, "On the approval of the technical specifications of the ballot paper for the elections of April 25, 2021, for the Parliament of Albania".

Commission the draft act<sup>118</sup> for approval of the content of the ballot paper. The attitudes of the representatives of the political parties <sup>119</sup> in the CEC regarding the competence of the Regulatory Commission for making this decision were divided, which was clearly reflected in the attitudes of the members of the Regulatory Commission during the public meeting. Despite the public discussions of the members during the meeting, the Regulator decided to declare the incompetence after non-public discussions, where it was agreed to vote unanimously on the incompetence, despite the position expressed by the members on this issue.

The Coalition for Reforms, Integration and Consolidated Institutions deems that the approval of the ballot paper template is in fact the competence of the Regulatory Commission, despite the fact that the law does not explicitly mention this competence, in analogy to the Commission's competence to approve the security elements of the ballot paper.

The decision-making process of the Commission in this case constitutes an evasion of the legal obligations of this body, an evasion which was dictated by the different positions of the political parties regarding this issue.

## IV.1.2.2.2. Approval of the final election results

The decision-making process on the final results of the elections was the last act approved by the Regulatory Commission, in function of the electoral process of April 25, 2021. This decision, which was very important for the process, was the only one approved by a simple majority of votes by the Regulatory Commission, which was preceded by the argumentation and public attitude during the meeting of its members.

In such cases<sup>121</sup>, it was observed an affiliation of the members with that of political entities participating in the process, with large differences in their judgment, on the one hand considering it as a failed electoral process and on the other hand the best process Albania has ever accomplished. The Regulatory Commission concluded in a "three "for" and two "against "decision-making process, reflecting the position of political forces.

Appreciating the efforts and public attitudes of both members<sup>122</sup> of the Regulatory Commission, even during the election process, in order to address very important issues with implementation challenges, such as non-compliance with Decision no. 9 of the Regulatory Commission or the publication of the personal records database, should have had a more proactive approach in obtaining publicly requested

122 Ms. Helga Vukaj and Mr. Muharrem Çakaj.

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<sup>118 &</sup>lt;u>Draft decision, March 2021</u>, Regulatory Commission, "On the approval of the content of the ballot paper for the Elections of April 25, 2021, for the Parliament of Albania."

<sup>&</sup>lt;sup>119</sup>The Socialist Party representative considered that this draft decision was not the competence of the Regulatory Commission, but of the Commissioner. Representatives of other political forces considered that this decision shall be taken by the Regulatory Commission.

<sup>&</sup>lt;sup>120</sup> Meeting dated 13.07.2021, part 1, Regulatory Commission, YouTube.

<sup>&</sup>lt;sup>121</sup> Meeting of the Regulatory Commission, part 1, dated 13.07.2021. <u>Listing</u> them Ms. Helga Vukaj min. 7–16; Mr. Muharrem Çakaj min. 16–22; Mr. Dritan Çaka min 2–25; Ms. Ilirjana Nano min 26-28.

information on the above issues. This would serve as a more institutional position at the end of the process.

### IV.1.2.3. The Commission of Appeals and Sanctions

The Commission of Appeals and Sanctions (CAS) is a CEC body competent to review administrative complaints and to impose sanctions regarding violations of election law.

CAS may decide to declare the elections as invalid in individual polling stations, districts or all over the country, or can even decide to repeat the elections; it examines complaints against the acts of the Commissioner or the Commissions of Electoral Administration Zone; it supervises the performance of commissioners, the manual counting process and it also imposes disciplinary measures in cases when electoral fraud is found after a *posterior* control; and it also imposes administrative sanctions against individuals or electoral subjects and / or their candidates, who commit administrative offences related to the elections, at the request of the Commissioner. The CAS decisions are taken by a simple majority (3/5), with the exception of decisions related to election results, where a qualified majority (4/5) is required 123.

In the time period covered by this report, 65 appeals<sup>124</sup> were reviewed out of a total of 77 submitted<sup>125</sup>, a total of 120 decisions were made,<sup>126</sup> and final decisions were made after reviewing the cases. For 16 decisions, the right of appeal was exercised at the Electoral College<sup>127</sup>, which decided to completely change the decision of the CAS for one case,<sup>128</sup> and partially for three cases.

Following the CAS decision-making, it is evident that such decisions in the vast majority were made with a simple majority<sup>129</sup>. The only cases where the decision-making process was unanimous were

<sup>&</sup>lt;sup>123</sup> The Electoral Code of the Republic of Albania, Article 21, "Competencies of CAS" (as amended by law no. 101/2020, dated 23.7.2020).

<sup>&</sup>lt;sup>124</sup> 21 requests were reviewed before election day, while 43 after election day.

<sup>&</sup>lt;sup>125</sup> CAS decided not to review eight appeal requests due to deficiencies in the elements of form and content pursuant to Article 130 of the Electoral Code of the Republic of Albania "Object of preliminary verification", CAS decided not to consider for review two other requests due to the incompetence over the object of the complaint, while after returning two other requests for completion it was decided to dismiss the case as the complaining subjects did not complete the relevant documentation. Meanwhile, an appeal filed by the DP had nothing to do with the election process, but with decriminalization.

<sup>&</sup>lt;sup>126</sup> Of which 83 interim decisions on specific cases (e.g., joined cases, return of criteria of review of appeals, failure to review, etc.).

<sup>&</sup>lt;sup>127</sup> For the decision no. 6 dated 16.02.2021 of the CAS, the Electoral College declared incompetence and the case was reviewed by the Administrative Court, which partially overturned the decision of the CAS.

<sup>&</sup>lt;sup>128</sup> Case with complainant the Socialist Party and object "Review of the request for registration of multi-name lists of the coalition Democratic Alliance for Change (PD-PR-PDIU-PAA-PBDNJ-PDK-LZHK-PLL-FRDBLD-PBKD-PBD-PKD), for the elections of April 25, 2021 for the Parliament."

<sup>&</sup>lt;sup>129</sup> In 34 decisions regarding the review of appeals, 17 decisions were approved with three votes "for" and two "against", 13 decisions five "for" and zero "against", three decisions four "for" and zero "against", and one decision four votes "for" and only one "against".

the appeal requests in which the main political entities<sup>130</sup> were not involved<sup>131</sup>, which is a clear indication of a political influence.

The block voting in accordance with the positions of the political entities, on essential issues under process<sup>132</sup>, called into question the impartiality of the given structure, contrary to the spirit of the Agreement of June  $5^{th}$  for a politically impartial structure.

In view of the electoral process, 35 decisions of the Commissioner were appealed to the CAS, which amended or revoked 18 of them. The most important are considered the decisions, which overturned the administrative measures imposed by the Commissioner, in function of the violations of Decision no. 9 of the Regulatory Commission<sup>133</sup>, setting a bad precedent in terms of the implementation of one of the innovations set out in the latest amendments to the Electoral Code, to prevent the use of public resources for electoral benefits.

According to the Coalition for Reforms, Integration and Consolidated Institutions regarding the given issue, the CAS showed a narrow reading of the, bypassing its spirit, which aims to prevent the use of public resources in order to guarantee equality in the electoral race. Despite this vision, the CAS is focused on the wording of the law, ignoring the purpose for which the statute was issued.

Even after the completion of the voting and counting process, the CAS amended seven decisions of the Commissioner regarding the administrative sanctions imposed on the commissioners of some Commissions of Electoral Administration Zone, for violations provided in Article 122 of the Electoral Code, which are specifically related to non-compliance with the deadline for approval of the final results.<sup>134</sup>

It was the first time that the CEC took such a step-in order to promote the accountability of commissioners for law enforcement, but even this decision-making process was undone by the CAS. Based on the judgment of the Coalition for Reforms, Integration and Consolidated Institutions, this decision-making process promotes a culture of impunity and disrespect for the law by election commissioners.

The Coalition for Reforms, Integration and Consolidated Institutions finds that the CAS was brought throughout the election process as an external part of the CEC rather than an integral part of the given institution.

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<sup>&</sup>lt;sup>130</sup> Socialist Party, Democratic Party and Socialist Movement for Integration.

<sup>&</sup>lt;sup>131</sup> Despite not being approved with a majority of votes, one of the CAS members voted to approve the PDIU's appeal request regarding the counting process in the GNV.

The use of public resources in the election campaign, content of the ballot, complaints of opposition parties and independent candidates regarding the election results.

<sup>&</sup>lt;sup>133</sup> <u>Decision no. 9, dated 24.12.2020</u>, Regulatory Commission, "On the rules for reporting public activities of public institutions, agencies and / or state enterprises, categories of prohibited activities, as well as monitoring the activity, behavior and use of human, financial and logistical resources of the state administration before the elections."

<sup>&</sup>lt;sup>134</sup> Electoral Code of the Republic of Albania, Article 122, point 1, "Issuance of the summary table of the election results by the Commissions of Electoral Administration Zone".

## IV.1.3. Use of technology in the election process

One of the much-debated changes during electoral reform, which received high public attention and was considered a key factor in improving the integrity of elections by the opposition, was the use of technology in the election process.

In order to realize the electronic identification of voters, upon the proposal of the extra-parliamentary opposition the Parliament appointed the Deputy State Election Commissioner as a guarantee for the realization of the application of technology in the election process.

Pursuant to the Electoral Code, <sup>135</sup>the main task of the Deputy Commissioner is to direct, monitor and supervise the implementation of technology for the electronic identification, as well as the recruitment and training of election officials. Pursuant to the legal obligations<sup>136</sup>, the CEC approved the relevant bylaws for the use of technology in the election process of April 25, 2021. These innovations include the achievement of electronic identification of voters throughout the country and electronic voting and counting, as a pilot project, in only one electoral administration area<sup>137</sup>.

A novelty in this election process was the equipment of each polling place with surveillance and security cameras.

### IV.1.3.1. Electronic Voter Identification System (SEIV)

Electronic identification is the identification of the voter through the verification of personal data reading by means of an Electronic Identification Device (PEI) of the identity card or passport of the voter, as well as their access to the electronic database for the voter list. The electronic identification of voters was an important part of the political agreement of June 5<sup>th</sup>, 2020, and a major innovation in this election process.

The individuals who managed and used the PEI on Election Day were not members of the respective Polling place Commission, but individuals recruited through an open call for applications and trained by the CEC. The criteria for being a PEI operator and the recruitment rules were approved by a decision of the Regulatory Commission<sup>138</sup>.

The CEC tested this way of identifying voters in three municipalities, respectively in Tirana, Kukës and Fier.

The electronic identification device contained the voters list of all polling stations and could identify if a voter had turned up at the wrong polling place, as well as identify the polling station at which the

<sup>&</sup>lt;sup>135</sup> Electoral Code of the Republic of Albania, Article 14 "Deputy State Election Commissioner" (as amended by law no. 101/2020, dated 23.07.2020).

<sup>&</sup>lt;sup>136</sup> Electoral Code of the Republic of Albania, Article 22 "Competencies of the CEC regarding the technology in the election process" and Article 23 "Procedure for the introduction of technology in the election process and decision-making process" (as amended by law no. 101/2020, dated 23.7.2020).

Decision no. 111, dated 02.03.2021, the State Election Commissioner, "On the designation of the electoral administration zone, no. 40, in the Municipality of Tirana, as the administrative unit for the implementation of the pilot project for the process of voting and electronic counting of votes".

<sup>138 &</sup>lt;u>Decision no. 07, dated 02.03.2021</u>, Regulatory Commission, "On the appointment of qualified personnel for the use of information technology equipment in the Polling place".

voter was to vote. The device could also identify if a voter had already voted at the polling place where the device was located.

As it was not connected to the system with other equipment or to a central database, voting at more than one polling place could not be identified in real time, but only after the process was completed <sup>139</sup>. The electronic identification device also allowed the search and addition of the voter manually, while noting the fact that the given voter was registered manually in the system. During the identification process, the voter signed by placing his / her fingerprint on the identification device. The fingerprint did not serve to identify the voter (the device did not make any connections between the data of the identification document and the fingerprint), but to identify if the same fingerprint was used to sign more than once.

The implementation of the given project is considered to have significantly facilitated the election administration process, as well as increased the process guarantee. Connecting all devices to the Internet would further guarantee the elimination of the opportunity to vote in more than one polling place in real time, while on the other hand it would reduce the system security, as the possibility of interference from outside to the system increases.

The CEC, due to the very short time available and the fact that the implementation of this process took place for the first time, encountered some difficulties during the process of recruiting operators for the administration and use of PEI. It turned out that voter identification process was done entirely manually in 193 polling places.

However, the technology did not work smoothly. Some of the problems related to the Election Day are related to the non-appearance of the operators, the equipment malfunction, which led to many polling places reporting delays in the voting process<sup>140</sup>.

Data on the progress of this process was included in the report on key triangulation of electronic and biometric data collected from electronic identification devices, which was approved by decision <sup>141</sup> of the State Election Commissioner.

The problems identified by the report consist of voters who were identified in 2 different polling places<sup>142</sup>; unique fingerprints scanned twice, i.e., a fingerprint associated with two different personal numbers<sup>143</sup>; as well as unique fingerprints scanned more than twice, i.e. a fingerprint

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<sup>&</sup>lt;sup>139</sup> <u>Decision no. 02, dated 31.10.2020</u>, Regulatory Commission, "On the technical characteristics and their typology which must meet the electronic identification equipment of voters who are procured and used in election process in the Republic of Albania

<sup>&</sup>lt;sup>140</sup> See Paragraph "Procedures of opening Polling Places" for more.

Decision no. 469 dated 3.12.2021 On the approval of the report on the key findings of the triangulation of the electronic and biometric data collected from the electronic identification devices in the elections for the Parliament of Albania on 25.04.2021"

<sup>&</sup>lt;sup>142</sup> Twenty voters were identified twice in different polling stations, representing 40 suspicious cases. Accordingly, the same document or personal number was scanned by the the Electronic Identification Devices at different times in different polling stations, where in one case the voter was part of the voter list of that polling station and in the other case, he/she was presented as an election staff.

<sup>&</sup>lt;sup>143</sup> Four hundred forty-eight suspicious cases were identified, where 224 fingerprints were presented twice for different identities. Consequently, the same fingerprint was scanned by the Electronic Identification Devices at different times for 2 different people.

associated with several different personal numbers<sup>144</sup>. Regarding these suspicions issued by the Electronic Identification Devices, the CEC filed a report at the Prosecution Office.

### IV.1.3.1.1. Complaints that used electronic identification as evidence

In the complaints submitted to the CAS after election day, which had as their object the declaration of invalidity and repetition of elections in some constituencies, one of the reasons listed regarding the given request were problems identified by the PEI, such as voting more than once, providing the same fingerprint for different voters.

Regarding these allegations, for only one county, two members of the CAS requested explanatory reporting from the Deputy State Election Commissioner. Despite the official request of the Coalition for Reforms, Integration and Consolidated Institutions for a copy of the given report, it was not made available on the grounds that it contains sensitive data.

In the public hearing of the CAS on 19.05.2021, for the review of complaints related to the County of Gjirokastër, the Deputy Commissioner, in response to the questions, referred some of the reasons for having the same fingerprint for some voters or the identification of those who were identified more than once by the identification device.

It is worth noting that these signatures do not legally prove that these individuals have exercised their right to vote, thus, it is certain that they have been identified, but not that they have voted, and therefore the evidence in question during the CAS trial remained deficient and should be reviewed by the Prosecution Office.

According to the Coalition for Reforms, Integration and Consolidated Institutions the CAS should have been more active in requesting a final review of the given proceedings in question, by also requesting the surveillance of the security cameras of the respective polling stations, the footage of which would provide information on whether those who attempted to vote and go through identification more than once, voted or not. Having an evasive approach, without analyzing the actualization of the allegations in question, CAS considered as relative each claim of the parties in the process over this issue, for all the other counties reviewed afterwards.

### IV.1.3.2. Electronic voting and counting

The implementation of electronic voting and counting was piloted<sup>145</sup> in the elections of April 25, 2021in only one district, the Municipality of Tirana.<sup>146</sup> Considering the importance of conducting this process, as a very important element of the Agreement of June 5<sup>th</sup>, the impact it may have on the trust in the electoral process, as well as in assessing the political consensus on the issue, the State Election

<sup>&</sup>lt;sup>144</sup> Five hundred eighteen suspicious cases were identified, where 44 fingerprints were presented more than twice for different identities. Consequently, the same fingerprint was scanned by the Electronic Identification Devices at different times for more than 2 different people.

<sup>&</sup>lt;sup>145</sup> This was the second attempt in the history of electoral processes in Albania, after the failed attempts to carry it out in the elections of 2013.

<sup>&</sup>lt;sup>146</sup> Decision no. 111 dated 02.03.2021, State Election Commissioner, "On the appointment of the EAZ, no. 40, in the municipality of Tirana, as the administrative unit for the implementation of the pilot project for the process of electronic voting and vote counting."

Commissioner requested by an official letter the eight political parties to submit their proposals regarding the constituencies, which they deemed most suitable for the implementation electronic voting and counting. Four political parties, the Socialist Party (SP), the Democratic Party (DP), the Socialist Movement for Integration (SMI) and the Democratic Conviction (DC), submitted<sup>147</sup> the relevant proposals.

After an internal process of discussions between the CEC and political parties, during the meeting of the Regulatory Commission regarding this issue the Commissioner stated that the CEC decided that the given project shall be implemented in one of the CECs of Tirana, with no more than 55 polling places<sup>148</sup>. Referring to the above criteria, the Commissioner decided to assign the Electoral Administration Zone no. 40 (Administrative Unit no. 10, in Tirana) for the implementation of the pilot project for the process of electronic voting and vote counting in the elections for the Parliament on April 25, 2021. The rules regarding the special procedures of the process which were covered by information technology systems or equipment were approved by the Regulatory Commission, while the technical rules of procedure for the administration and development of the electronic voting and counting process in the Commissions of Electoral Administration Zone no. 40 were approved by decision of the State Election Commissioner.

Twelve thousand ninety-six citizens voted in the 32 polling places where this technology was applied. The number of invalid ballots in this constituency was 120 (less than 1%). It should be noted that the possibility of making mistakes during the voting process using the electronic device was zero, but the votes were invalid as the voter chose the option "I do not choose any candidate". The placement of this option was determined in the decision of the SEC (State Election Commission), but this turns out to have been done without any legal grounds, as the Albanian legal framework does not entitle the voters to select alternatives such as "I do not vote for anyone" or similar.

The electronic voting process was well-administered, without any problems, regarding the technical and the administrative aspect of the given process. Although it could have been done earlier, the announcement of the election results for this constituency was made on April 26, 2021, to avoid any possible problems that may have occurred due to the implementation for the first time.

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<sup>&</sup>lt;sup>147</sup> The DP and the SMI demanded that the new technology shall be implemented in Fier and Korçë, the SP demanded that the new technology shall be implemented in Korçë and Tirana, while DC requested that the new technology shall be implemented in Tirana.

<sup>&</sup>lt;sup>148</sup> In the meeting of the Regulatory Commission dated 12.02.2021, Mr. Celibashi stated: "The CEC has aimed to fully implement not less than 10% of polling places and not more than 20% of polling places, for the pilot project of electronic voting and counting. During this period, we have tried in cooperation and consultation with political parties to have an agreement on the areas in which this project shall be implemented.

We agreed that due to time constraints and numerous financial and Human Resources implications it would be difficult for the CEC to extend the implementation to a number of polling places equal to a minimum of 10% and a maximum of 20%. . . Therefore, we have all given up that commitment, including the EC institution, the Commissioner, but also the interest of political parties, and we agreed that it may be possible to apply it in a smaller area. After the consultations, we thought that the implementation of this project in one of the EAZs of Tirana with a number of polling places not more than 55, would give us an indication on the effects of this project. It is intended to be either the area of the municipal unit no. 8 or unit number 3. Each of them has a number of 52 polling places ..."

### IV.2. Commissions of Electoral Administration Zone

The Electoral Administration Zones (EAZs) are set up and function for any type of election and referendum. It is a rule that an electoral administration zone coincides with the territory of a municipality, according to the territorial-administrative division of the country<sup>149</sup>, with the exception of municipalities that have more than 80,000 voters, which are divided into more than one electoral zone<sup>150</sup>.

The Electoral Administration Zones are approved by the CEC no later than 9 months prior to the end of the mandate of the Parliament, based on the number of citizens with the right to vote on the last date of the election period for scheduling elections, according to data from the General Directorate of the Civil Registry Office. The CEC reviewed the application of all criteria set out in the law and approved the allocation of EAZs <sup>151</sup>pursuant to the legal deadlines, by decision of the Regulatory Commission. In order to administer the electoral process as efficiently as possible in its second level, as well as for a faster and more transparent counting process, the Regulator decided to establish 92 Electoral Administration Zones, two more <sup>152</sup>than in the previous elections.

Elections in each electoral administration zone are administered by the Commissions of Elections Administration Zones (CEAZ), which constitute the second hierarchical level in the electoral administration. CEAZs consist<sup>153</sup> of seven voting members and one non-voting secretary. CEAZs membership reflects the political configuration of the Assembly, referring to the parliamentary majority and minority. The political parties, which were to nominate CEAZs members and secretaries, were determined by the CEC, by decision of the State Election Commissioner, on December 23, 2020<sup>154</sup>. In light of the resignation of the opposition in January 2019, in the Assembly elections on April 25, the Electoral Code includes a transitional provision, which dictated the establishment of CEAZs in accordance with the Assembly configuration after the 2017<sup>155</sup> elections and non-configuration at the time of the elections, in order to guarantee the participation of the extraparliamentary opposition in the administration of the process.

<sup>&</sup>lt;sup>149</sup> Electoral Code of the Republic of Albania, Article 27, "Electoral Administration Zones".

<sup>&</sup>lt;sup>150</sup> In the division of EAZs, the criteria of indivisibility of the administrative territory are applied, with the exception of EAZs with over 80,000 voters, the continuity of the territory, good communication opportunities within the territory, and the data of the General Directorate of the Civil Registry Office on the number of voting citizens.

Decision no. 06, dated30.11.2020, "On the establishment of Electoral Administration Zones for the elections of the Parliament, on April 25, 2021".

<sup>&</sup>lt;sup>152</sup> The need to increase the number of EAZs came as a result of the increased number of voters in these administrative units.

<sup>&</sup>lt;sup>153</sup> Electoral Code of the Republic of Albania, Article 29, "Composition of the CEAZ".

<sup>&</sup>lt;sup>154</sup> Decision no. 40, dated 23.12.2020, the State Election Commissioner, "On the appointment of political parties that will propose the members and secretaries of the CEAZs on the elections for the Albanian Parliament of April 25, 2021". Socialist Party two members, Democratic Party two members, Socialist Movement for Integration Party one member and Social Democratic Party one member.

<sup>&</sup>lt;u>Decision no. 5, dated 07.01.2021</u>, The State Election Commissioner approved the lottery according to which the seventh member in the CEAZs with even number would be nominated by the SP, while in the CEAZs with odd numbers by the DP.

<sup>&</sup>lt;sup>155</sup> Electoral Code of the Republic of Albania, Article 183, "Transitional formation of governing bodies and election administration", point 8.

The deadline for submitting lists for CEAZs members by political parties was January 11, 2021, a deadline which was not fully respected only by the Social Democratic Party. This party nominated members for only 33 CEAZs, leaving another<sup>156</sup> 59 with no members nominated by it.

According to the provisions of the Electoral Code<sup>157</sup>, and the Regulation "On the organization and functioning of the CEAZ", approved by the Regulatory Commission<sup>158</sup>, the right to propose members to fill vacancies passed to the other party within the same parliamentary group, namely the Socialist Party.

Following the submission of proposals by the SP to CEAZs in which the SDP did not submit proposals, the State Election Commissioner appointed<sup>159</sup> in the 59 CEAZs mentioned above SP members, filling vacancies. The non-fulfillment of legal obligations by the Social Democratic Party broke down the balance of political representation targeted by Article 29 of the Electoral Code, given that in the CEAZs with even number, specifically 30, the SP had four members. Furthermore, this configuration was also reflected in the composition of the Polling Station Commissions under the jurisdiction of these CEAZs.

The constitution of the CEAZs, as well as the appointment<sup>160</sup> of their members and secretaries was carried out in compliance with the legal deadlines. The first meetings of CEAZs throughout the country took place on January 27, 28 and 29, 2021, decided by a decision of the CEC, during which their chairmen and deputy chairmen were elected.

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<sup>156</sup> Due to the non-submission of proposals by the Social Democratic Party of Albania within the set deadline, vacancies were created for the position of member in CEAZs: Shkodër District: CEAZ no. 5, CEAZ no. 6; Lezhë District: CEAZ no. 10, CEAZ no. 14, CEAZ no. 15; Dibër District: CEAZ no. 17, CEAZ no. 18; Durrës District: CEAZ no. 20, CEAZ no. 21, CEAZ no. 22, CEAZ no. 23, CEAZ no. 24, CEAZ no. 25; Tirana District: CEAZ no. 39, CEAZ no. 41, CEAZ no. 42, CEAZ no. 43; Elbasan District: CEAZ no. 44, CEAZ no. 45, CEAZ no. 46, CEAZ no. 47, CEAZ no. 48, CEAZ no.49, CEAZ no.50, CEAZ no. 51, CEAZ no. 52, CEAZ no.53; Fier District; CEAZ no. 54, CEAZ no. 55, CEAZ no. 56, CEAZ no. 57, CEAZ no. 58, CEAZ no. 59, CEAZ no. 60, CEAZ no. 61, CEAZ no. 62; Berat District: CEAZ no. 63, CEAZ no. 64, CEAZ no. 65, CEAZ no. 66, CEAZ no. 67, CEAZ no. 68; Gjirokastër District: CEAZ no. 76, CEAZ no. 77, CEAZ no. 78, CEAZ no. 79, CEAZ no. 80, CEAZ no. 81, CEAZ no. 82; Vlorë District: CEAZ no. 83, CEAZ no. 84, CEAZ no. 85, CEAZ no. 86, CEAZ no. 87, CEAZ no. 88, CEAZ no. 89; CEAZ no. 90, CEAZ no. 91, CEAZ no. 92.

<sup>&</sup>lt;sup>5</sup> Electoral Code of the Republic of Albania, Article 29 "Composition of the CEAZ".

<sup>&</sup>lt;sup>6</sup> Decision no. 5, dated 20.11.2020, Regulatory Commission, "On the approval of the regulation on the organization and functioning of the Commission of the Electoral Administration Zone", article 3 "Composition of the CEAZ" point 7

<sup>&</sup>lt;sup>159</sup> <u>Decision no. 49, dated 11.02.2021</u>, State Election Commissioner, "On the appointment of members of some CEAZs", release and appointment of some members in CEAZ no. 72, Korçë District, CEAZ no. 77, CEAZ no. 81, CEAZ no. 82, Gjirokastër District, and the secretary of the CEAZ no. 82, Gjirokastër District.

<sup>&</sup>lt;sup>160</sup> <u>Decision no. 14, dated 25.01.2021</u>, State Election Commissioner, "On the appointment of members and secretaries of the Electoral Administration Zones Commissions for the Assembly elections of April 25, 2021".

The CEC announced the performance of the training of CEAZ members on March 22 and 23, 2021. From the reports of long-term KRIIK (Coalition for Reforms, Integration and Consolidated Institutions) observers, the trainings took place on the set dates and few absences were reported <sup>161</sup>.

Despite timely decision-making on the constitution of CEAZs, their training was delayed. Also, the legal changes made in the election law, the late approval of the relevant work manual of the CEAZs, were elements that may have had an impact on the level of performance of the membership of some CEAZs.

One of the problems observed in the work of CEAZs is the non-compliance with the schedule in some of them. From the visits carried out by the long-term observers of KRIIK, cases were identified when the CEAZ headquarters were found closed<sup>162</sup> during the official working hours of the CEAZ, posted in the relevant office. There were cases when this schedule was not posted<sup>163</sup> or even there were no distinctive signs at the entrance of the building<sup>164</sup>, elements, which made it difficult to access.

Problems have been noticed with the headquarters/offices designated by the CEC as premises where CEAZs should conduct their activity. They were identified by observers, CEAZs, which in the period before the start of the election campaign did not have adequate facilities to conduct their work and activity. In the best case it was concluded with the change of the headquarters and the proceeding in normal working conditions by the respective CEAZs<sup>165</sup>. There were also cases where due to the lack of a functional cooperation from the respective Municipalities the requests were fulfilled with a lot of delays<sup>166</sup>. There were also cases where, although the municipality took measures to change the

<sup>&</sup>lt;sup>161</sup> CEAZ no. 59, Fier lack of training conducted by the CEC of the deputy chairperson and a member of the SP. CEAZ no. 73 absence of the deputy chairman and a member, as well as the PSD member in the CEAZ no. 74. Absence of two members in the CEAZ no. 11 Kukës for health reasons.

<sup>162</sup> CEAZ no. 3 and no. 4 Shkodër, CEAZ no. 6 Vau i Dejës, CEAZ no. 11 Kukës, CEAZ no. 12 and no. 13 Lezhë, CEAZ no. 14 Mirditë, CEAZ no. 18 Bulqizë, CEAZ no. 19 Dibër, CEAZ no. 25 Shijak, CEAZ no. 26 Vorë, CEAZ no. 29, 30, 31, 32, 34, 37 Tirana, CEAZ no. 47, 48, 49, 50 Elbasan, CEAZ no. 53 Përrenjas, CEAZ no. 60 Patos, CEAZ no. 61 Roskovec, CEAZ no. 62 Mallakastër, CEAZ no. 73 dhe nr. 74 Korçë, CEAZ no. 76 Përmet, CEAZ no. 80 Gjirokastër, CEAZ no. 83, 84, 85, 86 Vlorë, CEAZ no. 88 Himarë.

<sup>&</sup>lt;sup>163</sup> CEAZ no. 3 Shkodër, CEAZ no. 6 Vau i Dejës, CEAZ no. 11 Kukës, CEAZ no. 12, 13 Lezhë, CEAZ no. 14 Mirditë, CEAZ no. 18, Bulqizë, CEAZ no. 19 Dibër, CEAZ no. 31, nr. 32, nr. 34, Tiranë, CEAZ no. 80 Gjirokastër, CEAZ no. 52 Librazhd, CEAZ no. 73 Korçë, CEAZ no. 88 Himarë.

<sup>&</sup>lt;sup>164</sup> CEAZ no. 19, Dibër, CEAZ no. 39 Tirana and CEAZ no. 90 Sarandë lack of distinctive signs in the facility, which is supposed to be the headquarters of the CEAZ, which has made it difficult also the work of long-term observers to provide information on the operation of the Zonal Election Administration Commissions, making it difficult to contact them.

<sup>&</sup>lt;sup>165</sup> CEAZ no. 74 in Korçë District has changed its location due to non-compliance with the conditions of the CEAZ headquarters. For BCC, EAZ no. 87 with the proposal of the Prefect of Vlorë Region was proposed the relocation from the high school "Hajredin Beqari", Selenicë to the Gym of "Eqerem Beqiri"9-year school, Kotë, as the latter offers better conditions.

<sup>&</sup>lt;sup>166</sup> CEAZ no. 3 and no. 4, Shkodër has made a request for change of the facility due to inappropriate conditions, the latter presents as a concern the lack of electricity, the lack of windows, internet and humid environment. CEAZ no. 32 the entrance to "Hasan Tasini" street and exactly to the classroom where the CEAZ office is located, is very narrow for receiving and submitting documentation for VCs. This was verbally submitted to the CEC, but until 12.03.2021 there was no decision from the latter. CEAZ no. 91, Finiq, also addressed a request to the Municipality of Finiq for change of headquarters due to limited space.

headquarters, the functionality of the new CEAZ headquarters continued to be compromised <sup>167</sup>. Although a good number of CEAZs have stated that they have had at their disposal all the necessary materials and logistics, in some of them, KRIIK long-term observers have observed or been informed by CEAZ members about serious lack of materials <sup>168</sup>.

Despite the problems, the CEAZs fulfilled their duties efficiently in terms of the EAZ election administration process. However, there is no need for further improvements in specific aspects of election administration in terms of last-minute replacements and training of new members. Regarding the level of experience in the field of election administration or knowledge of the Electoral Code, significant differences have been noticed among CEAZs members. In some cases, the electoral process has been administered almost entirely by the mayors and vice-mayors, who have held the greatest weight in decision-making, thanks to their experience and constant communication with the CEC. However, the spirit of cooperation between CEAZs members is appreciated. The commissioners reported to KRIIK observers that they had equal access to the information needed to carry out their work.

In sporadic cases, ignorance of the legal framework and lack of transparency towards observers were also observed. Although according to the Electoral Code<sup>169</sup>, CEAZ meetings are public, in some cases<sup>170</sup> KRIIK observers were not allowed to be present, even though they were provided with an accreditation issued by the CEC. This problem has been growing especially with the approach of Election Day. The above elements have made the work of observers more difficult.

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<sup>&</sup>lt;sup>167</sup> CEAZ no. 18 although it has changed headquarters, it has presented problems with operation, as it lacked electricity, internet, printer, telephone landline. The same situation is presented in the CEAZ no. 12 in Lezhë, which although its location has changed, its premises were placed in the showers "Hydajet Lezha" high school which lacked equipment, disinfectants, masks, etc.

<sup>&</sup>lt;sup>168</sup> CEAZ no. 5 Shkodra lack of internet connection. CEAZ no. 17, Klos lack of internet connection and safe. CEAZ no. 31 Tirana, lack of internet connection, landline and fax. CEAZ no. 57 Fier, lack of landline, mobile and fax. CEAZ no. 58 Fier lack of telephone landline, mobile and fax. CEAZ no. 59 Fier lack of telephone landline and mobile phone. CEAZ no. 60 Patos and no. 61 Roskovec lack of telephone landline and fax. CEAZ no. 76 Përmet lack of telephone landline and fax. CEAZ no. 77, Këlcyrë have reported shortages of materials, such as telephone landline, mobile phone and dry stores materials. CEAZ no. 72 Devoll, lack of internet connection, fax, telephone landline. CEAZ no. 78 Memaliaj, lack of telephone landline and fax. CEAZ no. 79 Tepelenë lack of internet connection. CEAZ no. 80, Gjirokastër until 12.03.2021 there was a complete lack of materials. CEAZ no. 87 Selenicë lack of internet connection, telephone landline and fax, photocopiers, computer, printer and dry stores materials. CEAZ no. 88 Himarë lack of telephone landline, fax and dry store materials.

<sup>&</sup>lt;sup>169</sup> Electoral Code of the Republic of Albania, Article 35 "Meetings and decisions of the CEAZ", point 1.

<sup>&</sup>lt;sup>170</sup> CEAZ no. 36, Tirana, failure to provide copies of decisions, as the chairman of the CEAZ considered it a violation of law. CEAZ no. 30, Tirana, although the observer is provided with accreditation by the CEC, the chairman of the CEAZ requests the list of members accredited by the CEC. CEAZ no. 5, Shkodër refusal to participate in the meeting of the relevant CEAZ with the motive that in addition to accreditation, members unanimously request the list of observers accredited by the CEC.

Despite being engaged in another job for CEAZs members, it is not something expressly prohibited by law. In KRIIK's judgment, this in practice leads to optimal inefficiency in the work and fulfillment of any obligation by CEAZs members. From the monitoring of KRIIK observers, it resulted that more than 50% of the CEAZs membership were employed in public administration<sup>171</sup>, even in leading positions<sup>172</sup>.

The law obliges public administration officials, who are engaged in the Local Election Administration Commissions, to obtain authorization from the superior directly in the institution where they are employed. From the official communication of KRIIK with the Commissioner for Civil Service Oversight, it results those 159 civil servants are engaged in the CEAZ, out of 736 members / secretaries / chairmen who were in a total of 92 CEAZs.

The change of CEAZs membership continued to be a worrying problem in these elections as well. Throughout the process, it is obvious that about 20% of the CEAZs membership has changed <sup>173</sup>. There have been cases when the replacements have affected the vast majority of the respective CEAZ members, as well as the replacements of the leading level of the CEAZ as chairman, deputy chairman or secretary <sup>174</sup>. The problem becomes even more troubling in the case of substitutions made close to Election Day, even the day before Election Day <sup>175</sup>, which led to the inability to train newly appointed members. Furthermore, cases of membership replacement were identified, replacement of the membership even of the chairmen of some CEAZs even during the Election Day and the counting process <sup>176</sup>.

<sup>&</sup>lt;sup>171</sup> For example, CEAZ no. 1 Malësi e Madhe, the secretary of this CEAZ holds the position of director of mortgage. CEAZ no. 2 The chairman of this CEAZ is also the director of "Kol Idromeno" school, Shkodër. CEAZ no. 4, Shkodër, the secretary of this CEAZ is an employee in the municipality of Shkodër. CEAZ no. 54 Lushnjë five of the commissioners are employed in the public sector. CEAZ no. 29 Tirana, the deputy head of the CEAZ was also employed as a teacher. CEAZ no. 60 Patos, no. 61 Roskovec and 62 Mallakastër, members of these CEAZs work simultaneously in the public administration. CEAZ no. 12 Lezhë, the deputy head of this CEAZ has also been an employee of the Municipality. CEAZ no. 15, Kurbin, the chairwoman of this CEAZ also holds the position of Director of Water Supply and Sewerage. CEAZ no. 74, the chairman of this CEAZ held the post of director of OSHEE. CEAZ no. 73, Korçë, the member of this CEAZ held the position of Director of Public Health.

<sup>&</sup>lt;sup>172</sup> The Deputy Mayor of Fier was also the Deputy head of CEAZ no. 59.

<sup>&</sup>lt;sup>173</sup> In the comparative approach with the previous elections, there is a decrease in the percentage of rotated membership of CEAZs. In 2013 and 2015 the number of dismissals-appointments in the CEAZ was 37%, in 2017 the replacements were 24.5%, while in 2019, despite the fact that the membership was not representative of all political forces, the replacements were in measure of 19%.

 $<sup>^{17\</sup>bar{4}}$  For a full list of dismissals and appointments in the CEAZ see Annex N.

<sup>&</sup>lt;sup>175</sup> The same.

<sup>&</sup>lt;sup>176</sup> During Election Day, three members were replaced in two CEAZs. During the counting process, three chairpersons and four members were replaced in seven CEAZs. For more details see Annex N.

Among other things, KRIIK observers were referred to allegations of the occasional change of three second-level commissioners of a political entity<sup>177</sup> for withdrawal as a result of political pressure. There were also cases of replacements after the identification of conflict of interest <sup>178</sup>.

Also, there was a turnout that came with increased intensity with the approach of Election Day, the membership of CEAZs in the electoral campaign of political parties. Although the law does not prohibit the active engagement of election officials in the campaign, in addition to undermining the time available for engagement as a CEAZ commissioner, strengthens and further promotes political partisanship in fulfilling legal duties as a member of the election administration.

### IV.2.1. CEAZs decision making

From the constant contacts of KRIIK observers, but also from the communication with the Central Election Commission, a low level of transparency and accountability was noticed regarding the decision-making by the CEAZs membership.

It is evident that three CEAZs have not yet<sup>179</sup> fulfilled the legal obligation to forward the relevant decision-making to the CEC. Also 57 CEAZs<sup>180</sup> have not taken any decision for accreditation of observers of election entities, while in the Voting Centers in the respective area, or in the BCC premises there were observers of these entities.

The legal framework does not oblige online publication of CEAZs decisions, in the same way as the decisions of the Central Election Commission, and KRIIK observers have encountered difficulties in a number of CEAZs in making their decisions.

The publication of decisions should be done on the website of the CEC and/or the Local Government Units in the territory of which these CEAZs are placed, for example, on the websites of the Municipalities, District or even the Prefecture.

<sup>&</sup>lt;sup>177</sup> CEAZ no. 77, it is thought that the occasional change of three members of SMI political entity has come as a result of political pressures.

<sup>&</sup>lt;sup>178</sup> A member of CEAZ no. 34, Tirana was replaced on 24.04.2021 as s/he had a gender relationship with the candidate of a political entity.

<sup>&</sup>lt;sup>179</sup> CEAZ no.27, CEAZ no.30, CEAZ no.40.

<sup>&</sup>lt;sup>180</sup> CEAZ no.2; CEAZ no.4; CEAZ no.5; CEAZ no.6; CEAZ no.8; CEAZ no.10; CEAZ no.14; CEAZ no.16; CEAZ no.17; CEAZ no.20; CEAZ no.24; CEAZ no.28; CEAZ no.31; CEAZ no.32; CEAZ no.34; CEAZ no.35; CEAZ no.37; CEAZ no.39; CEAZ no.42; CEAZ no.43; CEAZ no.44; CEAZ no.46; CEAZ no.50; CEAZ no.53; CEAZ no.54; CEAZ no.55; CEAZ no.56; CEAZ no.57; CEAZ no.58; CEAZ no.59; CEAZ no.60; CEAZ no.62; CEAZ no.63; CEAZ no.64; CEAZ no.65; CEAZ no.67; CEAZ no.68; CEAZ no.69; CEAZ no.70; CEAZ no.71; CEAZ no.72; CEAZ no.73; CEAZ no.74; CEAZ no.75; CEAZ no.76; CEAZ no.77; CEAZ no.78; CEAZ no.82; CEAZ no.83; CEAZ no.84; CEAZ no.85; CEAZ no.86; CEAZ no.87; CEAZ no.88; CEAZ no.89; CEAZ no.90; CEAZ no.91.

CEAZ decision-making before Election Day has been focused on approving the membership of CECs, BCCs and accrediting observers<sup>181</sup>. Also, during the counting process, there were CEAZs<sup>182</sup>, which decided to call the police at the premises of CEAZs and BCCs. Meanwhile, after the election day, the CEAZs have approved the summary tables of results.

The progress of the establishment of the Voting Station Commissions by the CEAZs was realized in excess of the legal deadlines, a problem that came as a result of the delays in the proposals of their membership by the respective political parties<sup>183</sup>. A worrying problem referred by long-term observers was the attempts of CEAZs to respect the legal deadlines in principle<sup>184</sup> as well as to avoid the occasional changes of BCC and CECs candidates. From the review of CEAZs decisions it is noticed that 17 CEAZs have decisions outside the legal deadline<sup>185</sup> for the constitution of CECs and 11 CEAZs<sup>186</sup> have taken decisions outside the legal deadline for the constitution of BCCs.

<sup>&</sup>lt;sup>181</sup> From the CEAZs, which have taken a decision on observers, it turns out that 381 party observers have been accredited for the observation of CEAZs; 7,521 party observers for observation in CEC; 1,206 party observers for BCC surveillance. <sup>182</sup> CEAZ no.1 requested the intervention of the police because there was a conflict between the observers before the start of the counting of votes; CEAZ no.22 requested the intervention of the police because there were unauthorized persons in CEC and/or the order and regular development of the voting counting process was endangered; CEAZ no.29 requested the intervention of the police because there were unauthorized persons in the CEC and/or the order and regular development of the voting counting process was endangered; CEAZ no. 47 requested the intervention of the police because near CEC there were unauthorized persons who spoke in high tones towards the counters, intimidating them to call, or not valid the votes.

<sup>&</sup>lt;sup>183</sup> For more see the section "Constitution of Voting Centers".

<sup>&</sup>lt;sup>120</sup> CEAZ no. 56 in Divjakë and CEAZ no. 60 in Patos have decided by agreement not to clarify the decisions until the final candidacies are received by the political parties. In the CEAZ no. 58 in the municipality of Fier, the relevant dates and signatures were set for the decision of their appointment, but not the names of the CECs members to place them at the final moment of their appointment. This behavior in an attempt to respect the law in terms of time, but its violation in terms of signing an act without content.

<sup>&</sup>lt;sup>185</sup> CEAZ no. 2 decisions for the appointment of CECs members are dated 06.04.2021; CEAZ no.5 decisions on the appointment of CECs members are dated 05.04.2021; CEAZ no.6 decisions for the appointment of CECs members are dated 05.04.2021; CEAZ no.11 decisions on the appointment of CECs members are dated 11.04.2021); CEAZ no. 36 decisions for the appointment of CECs members are dated 06.04.2021; CEAZ no.39 decisions for the appointment of CECs members are dated 12.04.2021; CEAZ no.51 decisions on the appointment of CECs members are dated 07.04.2021; CEAZ no. 56 decisions for the appointment of CECs members are dated 05.04.2021; CEAZ no.69 decisions for the appointment of CECs members are dated 06.04.2021; CEAZ no.70 decisions for the appointment of CECs members are dated 08.04.2021; CEAZ no.77 decisions on the appointment of CECs members are dated 09.04.2021; CEAZ no. 81 decisions on the appointment of CECs members are dated 05.04.2021; CEAZ no. 82 decisions on the appointment of VCC members are dated 11.04.2021; CEAZ no. 84, decisions for the appointment of CECs members are dated 09.04.2021.

<sup>&</sup>lt;sup>186</sup> CEAZ no.21 decisions for the appointment of BCT members start on 26.04.2021; CEAZ no.24 decisions for the appointment of BCT members start on 25.04.2021; CEAZ no.28 decisions for the appointment of BCT members start on 25.04.2021; CEAZ no.39 decisions for the appointment of BCT members start on 25.04.2021; CEAZ no.39 decisions for the appointment of BCT members start on 19.04.2021; CEAZ no.45 decisions on the appointment of BCT members start on 25.04.2021; CEAZ no.60 decisions for the appointment of BCT members start on 16.04.2021; CEAZ no.86 decisions on the appointment of BCT members start on 25.04.2021; CEAZ no.90 decisions for the appointment of BCT members start on 24.04.2021; CEAZ no.91 decisions for the appointment of BCT members start on 22.04.2021.

During Election Day, CEAZs generally operated efficiently and responded in a timely manner to voting issues. Meanwhile, the counting process suffered from procrastination and prolongation, especially during the counting of preferential votes for candidates<sup>187</sup>.

The Commissioner imposed administrative sanctions on the members and secretaries of 17 CEAZs<sup>188</sup>, arguing that despite the obligation set out in the Electoral Code<sup>189</sup>, they had counted less than 50% of VCs in their jurisdiction by 22<sup>00</sup> on April 26, 2021.

This decision of the Commissioner is positively assessed in the attempt to encourage the commissioners to respect the law, given that the membership of these CEAZs not only did not approve the summary table, and was in violation of the law, but the number of boxes counted was less than half.

What remains problematic in the treatment of the Commissioner, is the unequal treatment of the CEAZs membership, given that Code was punished only those who by the deadline set by the Electoral had not approved the summary tables for even half of the VCs in their jurisdiction. This is not a limit set by law, and in the same situation of non-compliance with the law were the membership of most other CEAZs.

It turns out that the only members of the seven CEAZs<sup>190</sup> appealed the decisions of the commissioner in CSC, who after jointly reviewing the complaints decided<sup>191</sup> to overturn the decision of the Commissioner by removing the administrative sanction against the members and secretaries of the CEAZs who appealed but encouraging the culture of impunity for commissioners and the relativization of the culture of law enforcement by them.

If the work of the CEAZs were to be judged only by the final result of the electoral process administration, then it can be said that the performance of the CEAZs was satisfactory. But if we would look in more details, day after day and week after week, we would notice that their work has faltered not only in specific elements of the election administration, but also in general.

<sup>&</sup>lt;sup>187</sup> For more see the section on Election Day and vote counting.

<sup>&</sup>lt;sup>188</sup> CEAZ no. 20, CEAZ no. 66, CEAZ no. 21, CEAZ no. 22, CEAZ no. 24, CEAZ no. 69, CEAZ no. 70, CEAZ no. 2, CEAZ no. 29, CEAZ no. 34, CEAZ no. 35, CEAZ no. 37, CEAZ no. 38, CEAZ no. 39, CEAZ no. 64, CEAZ no. 41 and CEAZ no. 42.

<sup>&</sup>lt;sup>189</sup> The Electoral Code of the Republic of Albania, Article 119, point 5, stipulates that the counting process continues uninterruptedly until the counting of all properly received boxes by the CEAZ. The counting process is interrupted by a decision of the CEAZ, only for reasons that do not depend on the election administration and that hinder the normal counting process. Referring to Article 122, point 1, of the Electoral Code of the Republic of Albania, which stipulates that the summary Table of the election results for the electoral administration area is issued by CEAZ no later than 22:00 of the next voting day.

<sup>&</sup>lt;sup>190</sup> CEAZ no. 20, CEAZ no. 21, CEAZ no. 2, CEAZ no. 38, CEAZ no. 66, CEAZ no. 22 and CEAZ no. 35.

Decision no. 55, dated 5.05.2021, The Complaints and Sanctions Commission, "On the review of appeal requests no. 27, no. 28, no. 29, no. 30 and no. 31".

## **IV.3.** Voting Center Commissions (VCCs)

# **IV.3.1** Polling Stations

The voting process in the elections of April 25, 2021, was conducted in 5,199 polling stations, of which 4,792 were located in public premises, 387 in private premises<sup>192</sup> and 20 were special VCs.<sup>193</sup>.

The Electoral Code stipulates that polling stations, as far as possible, should be located in public premises <sup>194</sup>. From a comparison of the ratios of public/private premises of polling stations in the last two elections, it is noticed that after a decrease in the percentage of polling stations set up in private premises in 2019, in the elections of April 25 this proportion increased again, gone to higher levels than those of 2017<sup>195</sup>.

<u>Table 1</u> - Ratio of the number of polling stations in public, private, and special premises in the last two elections.

	Parliamentary elections 2017	Local Elections 2019	Parliamentary elections 2021
PS in public premises	4 952 (92,4%)	5 063 (93,5%)	4 792 (92,2%)
PS in private premises	389 (7,3%)	334 (6,2%)	387 (7,5%)
Special PS	21 (0,4%)	19 (0,4%)	20 (0,4%)
Total PS	5 362	5 416	5 199

With the amendments to the Electoral Code in July 2020, the minimum threshold for the number of voters per polling station was increased from 200 to 300 voters <sup>196</sup>. As a result of this legal change, the total number of polling stations decreased by 217 PSs compared to the previous elections. KRIIK considers the increase of the minimum voter threshold for the opening of polling stations as a barrier imposed on the exercise of the right to vote by citizens, by removing voting centers from the residence

<sup>&</sup>lt;sup>192</sup> Where it is not objectively possible to designate a polling station in public premises, the CEC may decide to designate it in a private premise upon the proposal of the respective mayors.

<sup>&</sup>lt;sup>193</sup> Special institutions constitute a separate voting center area. The voting center in these institutions is set up when there are more than 15 voters.

<sup>&</sup>lt;sup>194</sup> Electoral Code of the Republic of Albania, Article 93, "Location of voting centers, CEAZs headquarters and Ballot Counting Centers", point 1.

<sup>&</sup>lt;sup>195</sup> From the reasoning of many mayors who have proposed the locations of polling stations, this has come as a result of damage to public buildings by the earthquake of November 2019.

<sup>&</sup>lt;sup>196</sup> Electoral Code of the Republic of Albania, Article 62, "Designation of areas and location of polling stations" point 1 "The area of the polling station must be within a compact and uninterrupted geographical territory and the number of voters for each polling station should not be less than 300 and greater than 1,000 voters."

of citizens, while the benefits of such an action are not clear nor have, they been explained in any case<sup>197</sup>.

The location of the polling station, as a rule, is assigned to the same address as that of the last election, unless for objective reasons, this is not possible and cannot change in the last 40 days before the election date, that is, after March 16, 2021, except when, due to force majeure, the change is authorized by the CEC. The Regulatory Commission, with Instruction no. 1, dated 05.12.2020<sup>198</sup>, set the rules and criteria that should be followed in cases when the chairman of the local self-government unit proposes to the CEC the determination of the location of the polling station in a private building.

Despite the legal provisions, CEC decided to change the address for 106 polling stations, even after March 16, 2021, following requests submitted by mayors.

In the justifications presented by them, it is noted that the requests for changing the address of polling stations were mainly due to the small area of polling stations, earthquake damage, failure to timely reconstruct the facility, or depreciation of premises by not meeting appropriate criteria to serve as a polling station.

This situation raises questions about the fulfillment of the legal obligation provided by the mayors, who had not properly performed the process of verification, control and then the proposal to the CEC of suitable premises for polling stations. Also, KRIIK observers reported in some municipalities<sup>199</sup> the problem of the existence of polling stations that did not meet the criteria or standards to be such.

### IV.3.2. Constitution of Polling Station Commissions (CPSC)

The composition of the Polling Station Commissions is the same as that of the CEAZs, and their members are nominated by the political parties with the same rule of CEAZs formation under whose jurisdiction they are located. In the conditions when the Social Democratic Party did not have members in 56 CEAZs, even in the polling stations under the jurisdiction of these CEAZs there were no members. In both commissions (CEAZ and VCC) these members were proposed by the Socialist Party.

The constitution of VCCs is the task of the CEAZs, following the proposals of the respective names by the political parties. This process had to be completed by April 5, 2021. The negative practice of

<sup>199</sup> Përmet Municipality, Mallakastër Municipality, Shkodër Municipality, Kamëz Municipality, Tirana Municipality.

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<sup>&</sup>lt;sup>197</sup> In none of the points of the accompanying documentation of the draft law, neither in the accompanying report nor in the report of the Parliamentary Committee on Legal Affairs, the change in this article is explained. See the accompanying documentation of the draft law.

<sup>198 &</sup>lt;u>Directive no.1 dated 05.12.2020</u>, Regulatory Commission, "Determining the rules for setting up, assigning and announcing the location of polling stations and preparing the map of the local self-government unit for the elections".

non-compliance with this legal deadline, delayed proposals by political parties and the constitution of VCCs up to 24 hours before Election Day, continued in this process. It is noticed that no electoral entity complied with the deadline for submitting proposals for VCC members  $^{200}$ . In addition to non-compliance with the deadline by political parties, the very frequent changes of VCC members proposed hampered the preparatory progress at this level of administration.

KRIIK long-term observers found that four CEAZs<sup>201</sup> formed VCCs only on April 23, 2021<sup>202</sup>, but after reviewing the decisions, it is noticed that the official decision-making dates are different, but in compliance with the legal deadline.

Moreover, the CEAZs Commissioners, based on the experience of previous elections with the practice of delays and changes by the parties, tried to find incorrect forms to formally respect the legal deadline provided for the establishment of VCCs<sup>203</sup>.

KRIIK observers, on Election Day, generally assessed the performance of polling station commissions as positive.

## IV.4. Ballot Counting Centers and Membership of Ballot Counting Teams

The ballot counting process was conducted at 92 Ballot Counting Centers (BCCs) by Ballot Counting Teams (BCTs) and under the supervision of CEAZs.

Ballot Counting Centers (BCCs) were determined by decision of the Commissioner, in compliance with the legal deadlines, following the proposals of the Prefects for addresses that could serve as BCC in the municipalities covered by the respective region. From the contact of KRIIK observers with the

<sup>&</sup>lt;sup>200</sup> SP did not send within the deadlines set by the Electoral Code the proposals for VCC members in CEAZ no. 10 in Has, CEAZ no. 11 in Kukës, CEAZ no. 13 in Lezhë, CEAZ no. 25 in Shijak, CEAZ no. 61 in Roskovec, CEAZ no. 65 in Berat, CEAZ no. 78 in Memaliaj. The DP did not send within the deadlines set by the Electoral Code the proposals for VCC members in CEAZ no. 21, 24, Durrës, CEAZ no. 52 Librazhd, CEA no. 33 Tirana, CEAZ no. 80 Gjirokastër.

<sup>&</sup>lt;sup>201</sup> CEAZ no. 21 Durrës, CEAZ no. 24 Durrës, CEAZ no. 76 Përmet, CEAZ no. 78 Memaliaj.

<sup>&</sup>lt;sup>202</sup> This information was gathered through conversations of KRIIK observers with CEAZ members, as the latter refused to make available to observers' relevant copies of CEAZ decisions.

<sup>&</sup>lt;sup>203</sup> CEAZ members are aware of this phenomenon, even in CEAZ no. 58 in the municipality of Fier, the decision of their appointment has been set with the respective dates and signatures, but not the names of the VCC members to place them at the final moment of their appointment. This behavior in an attempt to respect the law in terms of time, but of violating it in terms of signing an act without content. Meanwhile, CEAZ no. 56 in Divjakë and CEAZ no. 60 in Patos decided by agreement not to clarify the decisions until the final candidacies are received by the political parties.

12 Prefectures, it turns out that three<sup>204</sup> of them did not meet the deadline <sup>205</sup> for submitting address proposals that could serve as ballot counting centers.

Despite the approval of the BCC headquarters within the legal deadlines, due to new proposals from the Prefects, the address of the seven BCCs was changed. It is evident that as in the case of the mayors for the polling stations, even some prefects<sup>206</sup> had not properly performed the process of verification, inspection and then the proposal to the CEC of premises suitable for BCCs.

Ballot Counting Teams (BCTs) consist of four members nominated by political parties and appointed by CEAZs<sup>207</sup>. The political parties eligible to nominate members for the BCT were the Socialist Party, the Democratic Party, and the Socialist Movement for Integration Party. Referring to the Electoral Code, these parties were approved by the decision no. 193 of the Commissioner, dated March 31, 2021<sup>208</sup>. According to this decision, the Justice, Integration and Unity party, as the party of the PD-AN electoral coalition, was not legitimized to nominate the fourth BCTS member, because its rights as an entity were fulfilled by the leading party of PD-AN coalition (Democratic Party). PDIU appealed this decision to CSC and the Electoral College, which upheld the decision of the Commissioner.

The technical criteria for determining the number of Ballot Counting Teams for each Ballot Counting Center, and the rules for the division of tasks between the members of the Counting Team were specified and determined by decision of the Regulatory Commission. Also, the work manual of BCTs was approved at the public meeting of the Regulatory Commission dated April 20, 2021.

Although the Electoral Code<sup>209</sup> sets a deadline of ten days before Election Day for the Establishment of Ballot Counting Teams (BCTs), as in previous election processes, non-compliance with this deadline<sup>210</sup> was observed.

From the communication of KRIIK observers with the CEAZs, the reasons for the delay came as a result of the political parties, which brought the lists with the proposals of the candidates near the expiration of the legal deadlines or demanded that the members be replaced without motivated reasons. In addition to the delay, there were cases of appointment of BCTs members, just before the

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<sup>&</sup>lt;sup>204</sup> The proposal of the Prefect of Lezha Region submitted to the CEC with letter no. 171/3 dated 26.02.2021; The proposal of the Prefect of Tirana Region submitted to the CEC with letter no. 268/3 dated March 9, 2021; The proposal of the Prefect of Korçë Region submitted to the CEC with letter no. 296/1 dated 18.03.2021.

<sup>&</sup>lt;sup>205</sup> Electoral Code of the Republic of Albania, Article 94, "Location and preparation of Ballot Counting Centers", point 1. <sup>206</sup> Prefect of Shkodër, Korcë, Durrës, Vlorë, Kukës District.

<sup>&</sup>lt;sup>207</sup> Electoral Code of the Republic of Albania, Article 95 "Establishment of Ballot Counting Teams".

Decision no. 193, dated 31.03.2021, The State Election Commissioner, "The political party of the parliamentary majority, which has the right to nominate the third member of the Ballot Counting Teams for the elections for the Assembly on 25.04.2021, is the Socialist Party of Albania. The political party of the parliamentary opposition, which has the right to nominate the fourth member of the Ballot Counting Teams, for the elections for the Assembly of 25.04.2021, is the Socialist Movement for Integration Party".

<sup>&</sup>lt;sup>209</sup> Electoral Code of the Republic of Albania, Article 95, point 1 "For the counting of votes at the level of EAZ, by decision of the CEAZ, ten days before the voting day, Ballot Counting Teams are appointed".

<sup>&</sup>lt;sup>210</sup> CEAZ no. 21, no. 22, no. 68, no. 24, no. 32, no. 60, no. 66, no. 67, no. 81, no. 26, no. 33, no. 39, no. 40, no. 90.

start of the counting process, which made their prior training impossible. In the best case, the trainings of the VCC members were conducted by the representatives of the political parties, where there were cases where the information provided at the last minute was contradictory<sup>211</sup> to that of the manuals used by the CEC trainers.

Legislation should consider restricting the right of political parties to replace polling station commissioners and members of counting teams in an unmotivated manner on the eve of Election Day, as this hinders formal training, and consequently directly affects in the efficiency of these commissions.

The formation of lower-level election commissions should not only strictly follow the legal deadlines set for their establishment but should provide mechanisms that solve problems when the legal deadlines are not implemented by political parties.

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<sup>&</sup>lt;sup>211</sup> In the training of counting groups in CEAZ no. 89 Delvinë from the counters of a political entity was told that invalid ballots should not be shown on the monitor, which was later opposed by the trainer.

#### V. VOTER REGISTRATION

All citizens who have reached the age of 18 by the day of the elections have the right to vote, except in cases when this right has been revoked by a court decision, due to the Decriminalization Law or the declaration of legal incapacity to act. Voter registration is passive, with the exception of citizens who have reached the age of 100, who must apply to be included in the voter list.

Restriction of the right to vote for persons with mental health disorders, even though a court decision, is considered by KRIIK to be contrary to the international obligations of the Albanian state<sup>212</sup>.

A priori elimination from the voter list of citizens over 100 years of age is also considered a violation of their right to vote and age discrimination, as these voters are treated differently from other voters (active registration required, unlike other citizens). Although this measure facilitates the cleansing of the voter list from persons who are no longer living, KRIIK deems that the state should provide other mechanisms that achieve the same effect, avoiding discrimination of citizens based on arbitrary age criteria.

The total number of Albanian citizens with the right to vote for the elections of April 25, 2021, according to the final list of voters was 3 588 869, of which 1 812 442 (50.5%) men and 1 776 427 (49.5%) women.

Law no. 138/2015<sup>213</sup>, or the so-called Decriminalization Law, and the Instruction of the Minister of Interior<sup>214</sup>, provide that the GDCS, in cooperation with the General Directorate of Prisons, should identify and remove from the voter list citizens who are serving sentences for criminal offenses referred to in this law. The number of citizens who were not included in the lists for these elections, in reference to this law, was 1,098 citizens.

### V.1. Compilation of voter lists

The compilation and publication of extracts of electoral components is carried out through a process which includes the Minister of Interior, the General Directorate of Civil Status (GDCS), the municipalities, as well as the Civil Status Offices (CSOs) in each municipality. The Ministry of Interior, through the General Directorate of Civil Status, is the institution responsible for compiling and publishing voter lists, according to the data of the National Registry of Civil Status (NRCS), which is the database where the electoral components of Albanian citizens are stored, administered and processed.

<sup>&</sup>lt;sup>212</sup> Article 29 of Convention on the Rights of Persons with Disabilities charges the Member States with the obligation to guarantee the political rights of persons with disabilities and the opportunity to enjoy them in the same way as others.

<sup>&</sup>lt;sup>213</sup> Law no. 138, dated 17.12.2015, the Assembly of Albania, "On guaranteeing the integrity of persons who are elected, appointed or exercise public functions".

Instruction No. 225, dated 11.05.2016, Minister of Interior "On the procedures of suspension from the voter list for citizens serving the sentence provided by law No. 138/2015 "On guaranteeing persons who are elected, appointed and exercise public functions".

Pursuant to the obligations provided by the Electoral Code, four days after the decree of the election date by the President of the Republic, on September 10, 2020, the Minister of Interior issued the Instruction "On the procedures for compiling voter lists for the elections to the Albanian Assembly" 215. Based on this instruction and the provisions provided in the Electoral Code 216 the process of cyclical publication of voter lists was organized and carried out and, insofar as it was carried out, the process of written notification of citizens about the polling station.

During the process of compiling and publishing the extracts of the voter lists, there was a trend of changing the voters in the lists<sup>217</sup> which is considered normal for the time period involving the publication of the six extracts.

In December 2018, the GDCS started the process of updating or migrating the addresses of citizens in the National Registry of Civil Status. This process was carried out without any legal basis made public by the Ministry of Interior or the GDCS, despite the fact that from official communications with the institution, it was verbally announced that there is an order of the Minister of Interior, which is based on a DCM, but without clarifying the number of the DCM or referring to any other legal basis, even though official requests have been made several times.

Also, from the communication with the Ministry of Interior, it is mentioned that the project "Population", which was implemented in 2016-2017 and aimed at identifying the real address of citizens, was implemented by the Electricity Distribution Operator (OSHEE) in cooperation with the Ministry of Interior. The data collected from this much-discussed project on the lack of transparency and a number of other elements, were migrated to the NRCS to clarify the residential address of citizens. But, despite the migration of data in the system, the citizens' polling station (voter list with the respective polling stations), according to the MoI did not change, which is an absurd situation, as the polling station is directly related to the citizen's residential address.

Regarding all the above, but also referring to the oral communication with GDCS officials, it resulted that this institution can be considered to have simultaneously worked with "two databases" of NRCS, in terms of automatic generation of the voter list. "A database" which generates the previous Voters List, where the citizen appears as a voter in the VC where he had voted in the previous elections, and "a database" from which if you generate the civil status documents of the citizen, he probably appears in a residential address different from that of the Voters' List, an address which has been migrated there by the "Population" project.

Meanwhile, the Electoral Code clearly stipulates that the voter list<sup>218</sup> is automatically generated by the National Registry of Civil Status, which is only one, in the sense of the law, i.e., only with one main residential address. All of the above is considered a hasty approach by MoI and GDCS officials

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<sup>&</sup>lt;sup>215</sup> Instruction No. 298, dated 10.09.2020, Minister of Interior "On the procedures for compiling voter lists for the elections to the Albanian Parliament".

<sup>&</sup>lt;sup>216</sup> Electoral Code of the Republic of Albania, Part III, "Voters and the compilation of the voter list".

<sup>&</sup>lt;sup>217</sup> For more information on the performance of statistical data in the publication of extracts of electoral components see Annex K "Performance of statistical data of the Voters List".

<sup>&</sup>lt;sup>218</sup> Electoral Code of the Republic of Albania, Article 47 "Compliance with NRCS".

to solve the problem of citizens' addresses, a major problem over the years, by undertaking a process without a precise, clear and orderly legal basis.

The number of citizens with the right to vote, whose address of the voting center referring to the "two databases above" was not in the territory of their residence<sup>219</sup>, was 39 243<sup>220</sup> voters<sup>221</sup>.

During October 2020 some denunciations were broadcast in the media<sup>222</sup> by citizens for unauthorized changes of their residence address. Regarding this issue, there were public statements by the former Minister of Interior, Mr. Sandër Lleshaj <sup>223</sup>, General Director of Civil Status, Mr. Bledar Doracaj <sup>224</sup> and other officials, as well as relevant announcements on the official website of the Ministry of Interior<sup>225</sup>.

Through a public statement<sup>226</sup>, KRIIK called on the institution of the Ministry of Interior to make transparent the migration process of citizens, as well as all procedures followed in order to draft and publish election extracts. The Statement also brought up other elements of the process of compiling the voter list, in order to address some of the problems identified continuously in previous election processes.

An element that, as in previous election processes, continued to be a problem is the replacement of housing codes 000, 888, 999 in the voter list with residential addresses. This has been a number that has been steadily decreasing but considered as implemented not in accordance with the legal framework, according to the technical auditors appointed by the CEC. Moreover, examples have been brought from them that these addresses with unknown codes have been replaced and placed in fictitious addresses, such as parks, various state objects, etc., in the context of specifying the electoral

<sup>&</sup>lt;sup>219</sup> Electoral Code of the Republic of Albania, Article 46 "Voters List", point 1.

<sup>&</sup>lt;sup>220</sup> Although the data source is the GDCS, this number does not match the one stated by <u>technical auditor</u>, who in his report refers to 46 666 such voters.

<sup>&</sup>lt;sup>221</sup> This number of voters refers to the data of the GDCS, and this category includes *voters in separate VCs, their family members, because if one of the family members has a code different from the others, the whole family is counted, as well as citizens with codes VCs 777, 888 and 999 and their family members.* 

<sup>&</sup>lt;sup>222</sup> BOOM reveals scandal with voters' lists: The government is shifting opposition voters from VCs without their knowledge - September 28, 2020.

<sup>&</sup>lt;u>BOOM – The relocation scandal deepens</u>, Unit 4 in Tirana 'separates' the couple, the husband goes to Korçë and the wife to Unit 7, September 29, 2020.

**BOOM** brings other evidence: The family resident in Tirana moves to Dibra - 1 October 2020.

<sup>&</sup>lt;sup>223</sup> Interview of the Minister of Interior, Mr. Sandër Lleshaj, dated 02.10.2020 for the TV program "Real Story" on RTV "News24", Real Story/They "threatened" with a lawsuit, Lleshaj challenges the DP: Ridiculous! Let them go to the Prosecution Office...

Mistakes in addresses, Doracaj: There is no change of residences, there will be no problems for the elections. Interview of Mr. Bledar Doracaj for the TV program "Ilva Now" EuroNews Albania, dated 29.09.2020.

<sup>&</sup>lt;sup>225</sup> Statement of minister Lleshaj, dated 29.09.2020: The project for the functional address system is being implemented in Albania, there is no change of voting centers for citizens. Reaction of the Minister of Interior Sandër Lleshaj, after the statements of the opposition "No change is happening, will happen and can happen with the voting centers - Everyone needs to have an address".

<sup>&</sup>lt;sup>226</sup> KRIIK Albania, <u>Public Statement</u>. October 2020 "The Ministry of Interior to make the whole process of compiling and correcting the voter list fully transparent periodically."

components for the Local Elections of June 30, 2019, when a drastic reduction in the number of these addresses with unknown code was marked, from about 280 thousand to about a thousand addresses <sup>227</sup>.

This issue has been identified by one of the technical auditors<sup>228</sup> contracted by the CEC for these elections as well. In his view, the problem of putting fictitious residence codes to citizens who had an address with an unknown residence code continued to be present. Regarding the progress of data on this issue, the technical auditor has requested information from the GDCS regarding the username of the CSO that has performed the action of changing the address in the system, but, according to the auditor, response from the GDCS has been inaccurate and evasive, which has not allowed a full investigation<sup>229</sup> of the case.

## V.2. Notification of voters on the presence on the list and the relevant voting center

Voters can be informed about the respective voting center in several ways, including the cyclical publication of voters' lists physically in publicly accessible environments (carried out by municipalities according to temporary lists published by the civil status offices in each municipality); written notification of voters in their place of residence (which is carried out by the municipalities with funds allocated by the Ministry of Interior), as well as through checking the electronic list of voters, which is published on the Internet. During this 6-month process, the correction of electoral components or inaccuracies that may appear in the voters' list on the data of citizens can be done by going to the civil status offices of their area of residence.

After the publication of the Final Voters' List, in case of inaccuracies or the need to change the electoral components, voters can go to court for the relevant corrections/changes, in order to exercise their right to vote<sup>230</sup>.

KRIIK has had official communication with 22 judicial district courts in Albania, 11 of which<sup>231</sup> confirmed 271 requests submitted by voters for changes in the components of election extracts, of which at least 93 were made by persons serving sentences in the IECD.

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<sup>&</sup>lt;sup>227</sup> See Chapter "VIII. Voter Lists" pg. 83-91; Section "VI.2. Ministry of Interior" p. 64-64; as well as Section "VI.4. Municipalities" pg. 66-67; to Monitoring Report of "Legal and institutional behavior of institutions and actors involved in the election process of June 30, 2019", (monitoring period November 2018 - February 2020), published by KRIIK in June 2020.

<sup>&</sup>lt;sup>228</sup> "Final report of the auditor on the verification of actions in the database of the National Registry of Civil Status, Roland Kërçuku, pg. 12. of the auditor on the verification of actions in the database of the National Registry of Civil Status, Roland Kërçuku, pg. 12.

<sup>&</sup>lt;sup>229</sup> Report of auditor Roland Kërçuku on the verification of actions in the database of the National Registry of Civil Status, dated. 24.02.2021, pg. 10.

<sup>&</sup>lt;sup>230</sup> Electoral Code of the Republic of Albania, Article 57. "Judicial decisions after the compilation of the voters' list" (Amended by law No. 74 / 2012, dated 19.07.2012).

<sup>&</sup>lt;sup>231</sup> Judicial District Court: Berat, Fier, Korçë, Krujë, Lezhë, Puka, Sarandë, Shkodra, Tirana, Tropojë, Vlora.

## V.2.1. Cyclical publication of voter lists

According to the Instruction of the Minister of Interior<sup>232</sup>, six excerpts from the voters' list should have been compiled and published, starting with the publication of the first excerpt on October 6, 2020, and concluding with the publication of the final voters' list on March 5, 2021<sup>233</sup>. The publication had to be carried out in the premises of the civil status offices or in the premises near them with free access for the public, so that they could be consulted and checked by the citizens themselves, without any restrictions.

From the unsystematic observation of KRIIK activists during the period October, November, December, some municipalities<sup>234</sup> had problems with publishing extracts in these months. These problems consisted of late publication<sup>235</sup> of extracts of electoral components, or even publication<sup>236</sup> in inappropriate places and that meet the legal criteria, in some cases.

The final voter list was generated by the GDCS on March 15, 2021, in accordance with the deadlines set by law. But even in the last days of March some municipalities<sup>237</sup> referred to KRIIK long-term observers, that the lists had not yet been printed and published.

## V.2.2. Written notification of voters

The law also provides for the written notification of voters in his place of residence, regarding the voting center where they must vote, a very important process for verifying the data of citizens in the voters' lists, which must be completed within 60 days<sup>238</sup> from the announcement of election day<sup>239</sup>.

<sup>&</sup>lt;sup>232</sup> <u>Instruction No. 298, dated 10.09.2020</u>, Official Journal of the Republic of Albania, "On the procedures for compiling voters' lists for the elections to the Assembly of Albania".

<sup>&</sup>lt;sup>233</sup> A total of six extracts: 6 October 2020, 5 November 2020, 5 December 2020, 4 January 2021, 3 February 2021, and 5 March 2021 (final list).

<sup>&</sup>lt;sup>234</sup> Gjirokastër Municipality, Elbasan Municipality, Peqin Municipality, Shkodra Municipality, Berat Municipality, Këlcyrë Municipality, Durrës Municipality, etc.

<sup>&</sup>lt;sup>235</sup> In the municipality of Gjirokastër from the visit conducted on 12.03.2021 it was found that the posting of lists with electoral components is dated 31.01.2021. During the visit on 15.03.2021 the posting of the lists was dated 31.01.2021 in the office of Civil Status, Fier.

<sup>&</sup>lt;sup>236</sup> Durrës Municipality, Fier Municipality, Vlora Municipality and Tirana Municipality.

<sup>&</sup>lt;sup>237</sup> In the last days of March, the municipalities of Dropull, Libohovë and Gjirokastër have not yet issued final lists. In the Municipalities of Bulqiza, Dibra, Mat and Klos, the lists have been printed, but have not yet been submitted to the CEAZ as the signing process by the mayors has not been completed.

The CEAZ No. 5 in Shkodra Municipality has been found to have a problem with submitting the final voters' lists to the CEAZ, as the municipality has submitted only two of the three copies provided by the law. This has led to non-acceptance of lists by the CEAZ and delays in this process.

<sup>&</sup>lt;sup>238</sup> The notification covers the period from 6 October to 5 December 2020 for these elections

<sup>&</sup>lt;sup>239</sup> The notice contains "the voting center, its location and address, as well as the ordinal number of the voter in the voters' list of his/her voting center".

This process was even more important in these elections, as 54,242 voters had their voting centers addresses changed as a result of the amalgamation of 400 VCs due to the number of voters lower than the minimum limit of 300 voters per VC.

This process is carried out by the Municipality, through a special fund, which is allocated by the Ministry of Interior. The latter also generates the form template to be used for the notification. The fund of 14 435 000 ALL was allocated to the municipalities on 22 October 2020. This fund was delivered to the municipalities starting from October 22, 2020.

From the official communication of KRIIK with 61 municipalities in the country, some<sup>240</sup> of them in official response in December and January, confirmed that the fund had not yet been disbursed, while some others referred to different figures from the ones of the Ministry of Interior<sup>241</sup>, in relation to the amount allocated<sup>242</sup>.

Regarding the progress of the process of written notification of voters, the Ministry did not make any announcement, position or public statement.

Even during these elections, the written notification of the voters suffered from the same problems that accompanied it in previous election processes. Problems ranging from the way the notification model was drafted, its progress in the field, the lack of reliable information regarding the implementation of the process and the contradictory information collected by KRIIK observers and the Municipalities regarding the Ministry or the Central Election Commission.

<sup>&</sup>lt;sup>240</sup> Gramsh Municipality, in the official response to KRIIK with No. 4598/1 prot. dated 02.12.2020 refers: "The fund has not been allocated yet" by the Ministry of Interior.

Dropull Municipality, in the official response to KRIIK with No.151 prot. dated 26.01.2020 refers: "The fund has not been allocated yet" by the Ministry of Interior

Memaliaj Municipality, in the official response to KRIIK with No. 1884/1 prot. dated 22.01.2021 refers that "the disbursement of the fund was not carried out due to the pandemic, as the responsible employees were infected with Covid 19".

Kukës Municipality, in the official response to KRIIK with No. 5959/1 prot. dated 02.12.2020 refers that "... so far the voter registration process has not been completed due to the allocation of funds by the Ministry of the line that covers the civil status service."

<sup>&</sup>lt;sup>241</sup> Document No. 592/1 prot. dated 02.02.2021, with the object "Return of response" to the request of KRIIK addressed to the Ministry of Interior with No. 2012/80M, dated 28.12.2020 with the object "Request for information".

<sup>&</sup>lt;sup>242</sup> Dibra Municipality, the Ministry of Interior refers that the fund to this municipality is 230,000 ALL, while the municipality itself in the official response to KRIIK with No. 4504/1 prot. dated 15.12.2020 refers that the amount allocated by the Ministry of Interior is 1 205 000 ALL.

Tepelena Municipality, the Ministry of Interior refers that the fund to this municipality is 51,000 ALL, while the municipality itself in the official response to KRIIK via e-mail on 24 December 2020 refers that the amount allocated by the Ministry of Interior is 156,000 ALL.

Kamza Municipality, the Ministry of Interior refers that the fund to this municipality is 414 000 ALL, while the municipality itself in the official response to KRIIK with No. 9647/1 prot. dated 15.01.2021 refers that the amount allocated by the Ministry of Interior is 423 529 ALL.

Based on the documentation used, it was noted that the approved written notification model<sup>243</sup> did not contain space dedicated to being signed by the citizen being notified in order for him to confirm (by signing) the receipt of the written notification, as required by the Electoral Code <sup>244</sup>.

Also, the instruction did not provide in its content any mechanism for accountability of mayors on the process of written notification<sup>245</sup> of voters in the respective municipalities.

The instruction of the Minister of Interior did not contain any orientation regarding the way of managing the fund<sup>246</sup> and the time of its delivery to the municipalities for the completion of the written notification process of voters.

According to KRIIK communication with the Ministry of Interior<sup>247</sup>, the generation of the model for the written notification was completed on 30 November, which did not allow sufficient time for the municipalities to complete this process within the deadline set by law. The process of written notification of voters should have been completed by 6 December 2020.

KRIIK addressed an official request to 61 municipalities in the country, in November 2020, requesting information on the progress of the process.

In addition to the problem of non-response by some municipalities<sup>248</sup>, in some cases it is noted a lack of knowledge of the legal framework, and consequently even of the legal obligations of the institution.

Referring to the official responses, it was confirmed that this process had started to be carried out only in twelve municipalities<sup>249</sup> in November, in 27 municipalities<sup>250</sup> in December and January, while 12

<sup>&</sup>lt;sup>243</sup> See Instruction No. 298 of the Minister of the Interior (cit.).

<sup>&</sup>lt;sup>244</sup> Electoral Code of the Republic of Albania, Article 52 "Written notification of voters", point 4 Persons in charge of voters notification deliver the notification to the voter personally or, in the absence of the voter, a senior member of his family, who is in the residence of the voter, who signs for receiving the notice. ..."

<sup>&</sup>lt;sup>245</sup> Ibid, point 4 "... The mayor of the local government unit reports on the fulfillment of this obligation, according to the instruction of the minister who covers the civil status service".

<sup>&</sup>lt;sup>246</sup> Ibid.

<sup>&</sup>lt;sup>247</sup> Verbal communication with the Head of the Information Systems Directorate in the Ministry of Interior.

<sup>&</sup>lt;sup>248</sup> Cerrik Municipality, Fier Municipality, Kavaja Municipality, Kelcyra Municipality, Klos Municipality, Maliq Municipality, Vora Municipality, have not yet submitted a response even though KRIIK contacted them several times in order to provide the response.

<sup>&</sup>lt;sup>249</sup>Mallakastra Municipality, Libohova Municipality, Konispol Municipality, Kolonja Municipality, Memaliaj Municipality, Tropoja Municipality, Vlora Municipality, Vau i Dejës Municipality, Bulqizë Municipality, Divjakë Municipality, Gjirokastër Municipality, Mat Municipality.

<sup>&</sup>lt;sup>250</sup> Puka Municipality, Korçë Municipality, Delvinë Municipality, Pustec Municipality, Elbasan Municipality, Durres Municipality, Dropull Municipality, Gramsh Municipality, Devoll Municipality, Kuçovë Municipality, Tirana Municipality, Himarë Municipality, Ura Vajgurore Municipality, Shijak Municipality, Krujë Municipality, Roskovec Municipality, Fushë-Arrëz Municipality, Finiq Municipality, Shkodra Municipality, Poliçan Municipality, Librazhd Municipality, Patos Municipality, Përmet Municipality, Malësi e Madhe Municipality, Kamëz Municipality, Sarandë Municipality, Përrenjas Municipality.

municipalities<sup>251</sup> reported that they had not started this process yet, although the date of their response was December 2020 or January 2021.

Moreover, long-term observers of KRIIK reported problems regarding the implementation of this process<sup>252</sup>. Some municipalities referred to the difficulty of carrying out the notification as a result of errors in the addresses<sup>253</sup> of citizens' residences, due to long distances that may be covered by certain municipalities or due to successive absences of employees due to Covid-19 infection.

Regarding the implementation of this legal obligation, mayors shall report to the Ministry of Interior<sup>254</sup> and to the Central Election Commission<sup>255</sup>.

Referring to the official communication of KRIIK with the Ministry of Interior, until 2 February 2021, there was no report from the mayors to this ministry. Meanwhile, based on the verbal communication, according to the data available to this ministry, only 23 municipalities used the fund for written notification of voters, 16 municipalities did not use it. On the other hand, the Ministry of Interior has no information for 22 municipalities. Moreover, this Ministry claims that the reporting of mayors on this process to the Ministry of Interior has been almost non-existent.

Based on official communication with KRIIK with regard to the reporting to CEC, the latter confirmed that only nine municipalities<sup>256</sup> reported to it.

# V.3. Extension of the validity period of identification documents

Having a valid biometric identification document is vital in terms of exercising the right to vote<sup>257</sup>. It was continuously noted by local institutions that the number of Albanian citizens with the right to vote, who did not have an identification document within the validity period was very high<sup>258</sup>. In the framework of such a situation, during January-March 2021, the Ministry of Interior, through the General Director of the GDCS, undertook an information and awareness campaign in several municipalities of the country, in which all citizens who owned an invalid identification document,

<sup>&</sup>lt;sup>251</sup> Selenicë Municipality, Lezhë Municipality, Belsh Municipality, Mirditë Municipality, Skrapar Municipality, Lushnjë Municipality, Durres Municipality, Kukës Municipality, Peqin Municipality, Dibra Municipality, Pogradec Municipality, Kurbin Municipality.

<sup>&</sup>lt;sup>252</sup> Lezhë Municipality, until 21 March 2021, reported to the long-term observers of KRIIK that the written notification of voters is still under process, and the municipality does not yet have an exact number of notified voters up to the above-mentioned date.

<sup>&</sup>lt;sup>253</sup> Shkodra Municipality, Malësi e Madhe Municipality and Lezhë Municipality referred to difficulties in written notification of voters due to the presence of errors in addresses. The process of written notification in Tepelena Municipality, until 18 March 2021, was not carried out on the grounds that residents know each-other. The same thing was reported by Memaliaj Municipality, in which in addition to this fact, were reported cases of errors in addresses as a result of problems in the computer system.

<sup>&</sup>lt;sup>254</sup> Electoral Code of the Republic of Albania, Article 52 "Written notification of voters", point 4.

<sup>&</sup>lt;sup>255</sup> Ibid, point 6.

<sup>&</sup>lt;sup>256</sup> Fier Municipality, Malësi e Madhe Municipality, Krujë Municipality, Ura Vajgurore Municipality, Kukës Municipality, Berat Municipality, Bulqiza Municipality, Puka Municipality, Poliçan Municipality.

<sup>&</sup>lt;sup>257</sup> Electoral Code of the Republic of Albania, Article 105 "Voter presentation at the voting center", point 1 (a).

<sup>&</sup>lt;sup>258</sup> The number of citizens who did not have a valid ID on the election day was around 650,000 citizens.

were asked to apply for its renewal. Despite the fact that this number was decreasing, it still remained high.

This problem was also raised by two members of the Regulatory Commission, during the two meetings held by this panel. Following their public and explicit request, CEC addressed an official request to the Ministry of Interior, in which it requested to the Ministry to take steps to enable the exercise of the right to vote of this category of citizens, by taking into consideration the extension of the validity period of the biometric identification document.

Through a normative act<sup>259</sup>, the Council of Ministers, on the proposal of the Minister of Interior, decided to extend the validity period of electronic ID cards beyond the expiration period, until 30 April 2021, this normative act gave the opportunity to vote to every citizen with the right to vote regardless the date of validity of the biometric identification document.

#### V.4. Technical auditors

The Central Election Commission, through the proposals of the Commissioner and the Deputy Commissioner, appointed two technical auditors<sup>260</sup> to supervise the process of compilation of the voter lists. By contracting these technical auditors, who during their work have the same access in the database of the National Registry of Civil Status as GDCS Director, CEC supervises the process of compilation of the voter lists. Auditors shall report to CEC<sup>261</sup> monthly.

In addition to the final reports, these auditors compiled and submitted two interim reports to CEC. However, referring to the date of their appointment, the technical auditors were contracted by CEC and worked for a period of five months and during that period they were expected to draft and submit a monthly report<sup>262</sup> to CEC. This obligation was not unfulfilled by both auditors.

Even in these elections, a drastic change was noticed in the content of the reports written by the technical auditors, in terms of the problems presented in them. The audit appointed by the commissioner (or the chairman of CEC in the previous elections) submits a report with no evidence of problems, in which is assessed the very positive progress of the process of the compilation and publishing of voter lists. It is completely the opposite with the audit that was appointed by the deputy

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<sup>&</sup>lt;sup>259</sup> Act No. 11, dated 25.03.2021, "On an amendment to Law No. 8952, dated 10.10.2002, 'On the electronic identity card of Albanian citizens', as amended", published in the Official Journal on 26.03.2021.

<sup>&</sup>lt;sup>260</sup> <u>Decision No. 1, dated 19.10.2020</u>, the State Election Commissioner, "On the appointment of the technical auditor regarding the supervision of the process of the compilation of voter lists in relation to the elections for the Assembly, dated 25 April 2021", and <u>Decision No. 13, dated 28.10.2020</u> "On the appointment of the technical auditor regarding the supervision of the process of the compilation of voter lists in relation to the elections for the Assembly, dated 25 April 2021".

<sup>&</sup>lt;sup>261</sup> Instruction No. 2, dated 28.12.2012, the Central Election Commission "On the approval of special rules for the terms and conditions of the contract and the performance of the audit by the technical auditors regarding the verification of actions in NRCS database and in the Electronic Verification System SEV".

<sup>&</sup>lt;sup>262</sup> Electoral Code of the Republic of Albania, Article 61, point 7. "Supervision of the compilation of voter lists by CEC" (Amended by Law No. 74/2012, dated 19.07.2012, the second sentence of point 2 amended, one sentence added after the first sentence in point 3, points 5 and 8 amended by Law No. 101/2020, dated 23.7.2020).

commissioner (or the deputy chairman of CEC in the previous elections), which presents a report that identifies violations and raises serious questions about the operation and security of the database by the employees of GDCS.

According to one of the technical auditors, it is expressed the concern that in many cases, GDCS continues to respond late and is very superficial<sup>263</sup> in its responses to questions or issues raised.

Referring to the communication of KRIIK with CEC, we were informed that the reports of the technical auditors were forwarded to GDCS, but they were not to give explanations about these reports as provided in Article 61 of the Electoral Code<sup>264</sup>.

## V.5. Registration of voters residing abroad

Albanian citizens living abroad enjoy the political freedoms and rights, provided by the Constitution of the Republic of Albania and the Albanian legislation<sup>265</sup> in force, having the right to actively participate in the political life of the country. These citizens have the right to exercise the right to vote and this must be guaranteed by the Albanian state authorities in compliance with the constitutional obligation.

Public promises and commitments of the ruling parties to guarantee the right of immigrants to vote have been discussed continuously, but the first concrete step regarding the preparation of the legal basis for the implementation of this process began by the Prime Minister's Order No. 124, dated 18.09.2019<sup>266</sup>, according to which the Working Group was set up, chaired by the Minister of State for Diaspora, which drafted the legal package to be included in the Electoral Code as well as the National Strategy of Diaspora 2018-2024<sup>267</sup>.

Based on the amendments<sup>268</sup> approved by Law No. 101/2020, dated 23.7.2020, the Electoral Code<sup>269</sup> guarantees the right of Albanian voters who have permanent residence outside the territory of the Republic of Albania to vote for the Assembly elections, by registering in advance the permanent

<sup>&</sup>lt;sup>263</sup> "Auditor's report on the verification of actions in the database of the National Registry of Civil Status", Roland Kerçuku, dated 24.02.2021, pg. 6.

<sup>&</sup>lt;sup>264</sup> Electoral Code of the Republic of Albania, Article 61, point 8. "Supervision of the compilation of voter lists by CEC" (Amended by Law No. 74/2012, dated 19.07.2012, the second sentence of point 2 amended, one sentence added after the first sentence in point 3, points 5 and 8 amended by Law No. 101/2020, dated 23.7.2020).

<sup>&</sup>lt;sup>265</sup> <u>Law No. 9666, dated 18.12.2006</u>, Parliament of Albania, "On the emigration of Albanian citizens for employment reasons", Article 6.

<sup>&</sup>lt;sup>266</sup> Order No. 124, dated 18.09.2019, the Council of Ministers, "On the establishment of the inter-institutional working group for drafting the legal package for guaranteeing the right to vote for Albanian citizens outside the territory of the Republic of Albania".

<sup>&</sup>lt;sup>267</sup> National Diaspora Strategy 2018-2024 and Action Plan, approved by decision of the Council of Ministers No. 259, dated 09.05.2018.

<sup>&</sup>lt;sup>268</sup> Until 2020, according to the legislation in force, Albanian citizens residing abroad could vote only by coming physically to Albania

<sup>&</sup>lt;sup>269</sup> Electoral Code of the Republic of Albania, Article 46 "Voters List", point 3.

address of residence abroad in the National Registry of Civil Status. These applications could be made through e-Albania portal, referring to the procedures set out in DCM<sup>270</sup> of 4 November 2020.

The Electoral Code<sup>271</sup> assigns the Central Election Commission for the implementation of all bylaws, preparation of conditions and implementation of measures that enable voting from abroad for the Assembly elections, regarding the voters who have permanent residence outside the territory of the Republic of Albania. Regarding the progress of work, CEC, with Order No. 91, dated 31 October 2020, set up the working group regarding the possibility of voting from abroad for the elections of 25 April 2021.

Despite the report drafted<sup>272</sup> by this group, CEC did not take any other public steps to lay the legal basis for the implementation of the voting process of immigrants.

Failure to take a decision on the inclusion of voting from abroad for the first time in the ordinary voting procedures in these elections, according to the provisions of Article 24, point 3 of the Electoral Code, automatically postpones the inclusion of voting from abroad as an integral part of the voting procedures, no earlier than the 2029 elections.

The number of Albanian citizens permanently residing abroad is relatively high. As their registration has never been done before, based on approximate calculations, according to INSTAT and CEC data, there are about 1,600,000 citizens, out of which 1,300,000 are voters. Currently, the number of Albanian citizens, who have declared the address of residence outside the territory of Albania and who have completed the procedure for the registration by the Ministry of Interior, is 1475<sup>273</sup>.

The State Election Commissioner continuously highlighted the importance of political agreement for the realization of this process, as well as the very limited time available to the Central Election Commission for the establishment of all necessary legal infrastructure, as well as other infrastructure, regarding the realization of this process<sup>274</sup>.

https://www.facebook.com/Ilirjan.Celibashi/videos/928718701201612 https://www.facebook.com/KOZShqiperi/videos/244749337277289

I have never been optimistic, but I have supported this project, because the time available has not been what we really hoped for. However, we thought that this process could be implemented. I still hope for the realization of this process, just for the fact that the number of those who are registered in RCS is small. Consequently, there is a possibility that we can try it as a test for these elections. It remains to be seen. Theoretically, I still think that this project can be carried out for these elections. It is true that CEC has the obligation to prepare the acts and the infrastructure for the voting of the

<sup>&</sup>lt;sup>270</sup> <u>Decision of the Council of Ministers, No. 915, dated 04.11.2020,</u> Official Journal of the Republic of Albania, number 208, dated 27.11.2020.

<sup>&</sup>lt;sup>271</sup> Electoral Code of the Republic of Albania, Article 24 "Competencies of CEC regarding voting from abroad".

<sup>&</sup>lt;sup>272</sup> The report includes the legal progress of this process, as well as concrete examples of how this process is carried out in five different countries.

<sup>&</sup>lt;sup>273</sup> Referring to the communication of KRIIK with GDCS, from December 2020 to March 2021 there were 4,550 applications for registration of residence outside the territory of Albania in *e-Albania* portal, while only 1475 of them were processed by the Ministry of Interior during the same period.

<sup>&</sup>lt;sup>274</sup> In a press conference, Celibashi stated that "regarding the voting of immigrants, unfortunately, the process continues to have no concrete results. According to the request of some parties, we have prepared a list of acts required by the parties in order to have a clear understanding on the procedures that CEC will follow. KRR will most probably pass the draft on the procedures of voting from abroad next week. Theoretically, there is a chance that it will be accomplished."

Failure to ensure the voting of the immigrants resulted in a lost case as well as a violation of the political commitments of the parties, according to the agreement of 5 June 2020.

KRIIK has consistently underlined the importance and need to guarantee to voters living abroad the right to vote, not only as an obligation of institutions to these citizens, but also as a way to weaken the system of political patronage and voting which is established within the country.

The legal regulation made by the amendments of July 2020 is considered by KRIIK as totally insufficient to achieve the effective implementation of this process, by entrusting CEC with tasks which, effectively, were unachievable in the absence of a political consensus and detailed legal regulation. It was noted that, beyond the verbal will expressed by the political parties, there was a lack of pure will on their part in carrying out this process.

# V.6. The right to vote of persons in self-isolation (infected with SARS-COV-2 virus and their families)

Although it was easily predictable that 25 April elections would take place in a pandemic situation, the political parties never included this issue in the discussion of the Political Council, as far as is known and made public.

KRIIK raised this issue by an Open Letter in June last year<sup>275</sup> and called on institutions and political parties to consider this possibility and to prepare possible scenarios for the administration of the electoral process in a pandemic situation, a call which is repeated consecutively several times.

emigrants, but the time is crucial. If we consider the time that was made available to CEC, it would be unfeasible not just for CEC, but also for any other country that has applied this process correctly. It is impossible to carry out all the legal and other infrastructure in just six months. It is a delicate process. Regarding the argument that CEC had the duty to draft acts by February 20, 2021, we can say that there is a provision in the code of EC which states that the regulatory commission makes a decision when it will include for the first-time voters outside the country in elections. Therefore, the legislator himself has left it to the Regulator to make this decision. The latter has the right to decide when to include them. We are making the rules from scratch. It is very important that this process has the consent of the political parties. CEC is fully engaged as long as it has the means and the time to succeed, if it does not succeed, CEC has no responsibility at all.

https://youtu.be/IIfLZG0xPFA "We have an approach to seek consensus of all political parties, not to pay back with the re-establishment of CEC. that's all we can achieve. But we would like to have an electoral process with a full consensus, in accordance with the rules that CEC is trying to adapt, without compromising the interest of the Albanian voter at all. In this context, the approach of CEC regarding the draft of the emigrants' vote, in order to have the consensus of all parties is at this point. It is not that the Electoral Code has resolved anything on this issue, it has guaranteed them the right that has already been guaranteed in the constitution. It is a very complicated thing from the point of view of time. Today, we officially have no more than 854 Albanians with permanent residence outside Albania. CEC need to arrange the voting for these emigrants. According to the Albanian law, there are only 854 citizens living permanently outside the territory of Albania. Therefore, CEC will have to prepare the process only for these 900 Albanians. It is not guaranteed even for them the set of how they will vote."

<sup>275</sup> KRIIK Albania, Open Letter, dated 16.06.2020, "The agreement reached in the Agreement of 5 June, as a moment of leadership to overcome the experience so far".

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Political parties and the institutions had no reaction on this issue for months. The first reaction came from Prime Minister Rama, during a Press Conference<sup>276</sup>, in which in response to a question from one of the journalists he stated that "We will proceed in the same way as other countries have proceeded. Those who are tested positive and have not been negative should stay home."

The lack of reaction and consideration that the elections would be organized in a pandemic period, shows the lack of respect for the right to vote, as an essential right of the citizen and, on the other hand, the consideration of the electoral process simply as a voting mechanic process for the mandate of a political power.

The Albanian state openly failed to fulfil the obligation to guarantee all its citizens the right to vote, an undeniable and inviolable right that the Constitution and the International Conventions<sup>277</sup> ratified by the Albanian state recognize to the citizens.

On the other hand, such an approach is a violation of the provisions of the Electoral Code, as it provides for the establishment of Special Voting Centres in the premises of hospitals or health centres where not less than 15 patients are hospitalized and for a period of not less than three days.

<sup>&</sup>lt;sup>276</sup> Press Conference with journalists, 2 March 2021, <u>Prime Minister Edi Rama</u> "We will proceed the same as other countries have proceeded, and those who are tested positive, and are not negative, definitely should stay at home, they must be self-guaranteed, etc."

<sup>&</sup>lt;sup>277</sup> Paragraph 25 of the International Covenant on Civil and Political Rights. See also Paragraphs 11 and 12 of <u>General Comment</u>, No. 25 of the United Nations High Commissioner for Human Rights.

#### VI. REGISTRATION OF ELECTION CONTESTANTS AND CANDIDATES

The right to stand for election is regulated by the Constitution of Albania, the Electoral Code<sup>278</sup>, and the Law on Decriminalization<sup>279</sup>.

An election contestant is any political party or coalition of parties, which submits lists of candidates to the Central Election Commission, as well as any Albanian citizen, who is proposed as a candidate for deputy by a group of voters according to the provisions of the Electoral Code. Every citizen who has reached the age of 18 has the right to stand for election, except for those who have lost this right due to the commission of certain categories of criminal offenses (defined in the Decriminalization Law), as well as some categories of persons who exercise certain public duties<sup>280</sup>.

Part IV of the Electoral Code, which deals with the registration of election contestants, was part of the amendments to the Electoral Code approved by Law No. 101/2020, dated 23.7.2020, as well as by Law No. 118/2020, dated 5.10.2020<sup>281</sup>.

The amendments of October 2020, carried out without the consensus of the extra-parliamentary opposition, contrary to the spirit of the Agreement of 5 June 2020, were preceded by constitutional changes made in July 2020, which were also carried out unilaterally, without the consensus of the extra-parliamentary opposition as well as through a fictitious consultation process.

The amendments include the elimination of the possibility of the political parties to join pre-election coalitions by submitting individual lists (for each party) of candidates, and, consequently, requiring each coalition to submit a single list of candidates.

Making legal amendments to such an important element of the electoral process, such as the registration of election contestants, in the absence of a comprehensive consultation process and political consensus, was assessed by KRIIK as a negative aspect which seriously endangered the trust in the electoral process.

<sup>&</sup>lt;sup>278</sup> The Electoral Code of the Republic of Albania, Articles 45 "Electoral Components" and Article 69 "Candidates proposed by voters for elections to the Assembly", and <u>Law No. 138/2015</u>, <u>dated 17.12.2015</u> "On guaranteeing the integrity of persons who are elected, appointed or exercise public functions", Official Journal, published on 22.12.2015. "On guaranteeing the integrity of persons who are elected, appointed or exercise public functions", Official Journal, published on 22.12.2015, Article 2, "Prohibition to run and be elected to a high public office".

<sup>&</sup>lt;sup>280</sup> Judges, prosecutors; active-duty military; police and national security officers; diplomatic representatives; mayors for elections to the Assembly; deputies, when running for local government elections; prefects in the regions where they perform their duties for elections to the Assembly and for the local government bodies; chairmen and members of election commissions; President of the Republic; and senior state administration officials designated by law. Electoral Code of the Republic of Albania, Article 63, "Election contestants and candidates", point 4 e.

<sup>&</sup>lt;sup>281</sup> In view of these amendments, in order to detail the candidacy rules, CEC approved the <u>Instruction No. 1</u>, dated 23.12.2021, "On determining the rules for the submission and verification of candidacy documentation, deadlines for the publication of candidate lists and the approval of candidacy models".

Political parties that do not have a mandate in the Assembly or candidates nominated by voters have the obligation to present voter supporting signatures in order to be registered as candidates<sup>282</sup>. The number of supporting signatures to be submitted is in compliance with good election practices<sup>283</sup>.

Despite this, the gathering of supporting signatures proved to be a barrier to the candidacy of independent candidates. Out of eight initiating commissions registered in CEC, only five managed to collect the required signatures.

Three of these independent candidates were supported by Self-Determination Center (Self Determination), which in Albania is registered as a non-profit organization<sup>284</sup>, according to Albanian law, therefore they had the opportunity to use the resources of an existing organizational structure. Moreover, the candidates of this movement also benefited from the public support of the Prime Minister of Kosovo (shadow prime minister at the time) and the leader of the Self-Determination Movement, Mr. Albin Kurti, during the gathering phase of supporting signatures, during the latter's visit to Albania on March 3, 2021<sup>285</sup>. Although it is difficult to measure correctly the support of Mr. Kurti, especially immediately after the elections of 14 February 2021 in Kosovo, in which the party led by him had a very high result, it is likely that his direct engagement has significantly affected the gathering of signatures.

Regarding the elections of 25 April 2021, the Central Election Commission registered 46 political parties<sup>286</sup>, 2 coalitions<sup>287</sup> and 5 independent candidates<sup>288</sup>.

As a result, after being grouped in electoral coalitions and after the candidate lists were submitted, there were 12 election contestants in each region, and 13 in 5 regions<sup>289</sup>, in which were included independent candidates. The total number of candidates for deputies was 1841<sup>290</sup>.

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<sup>&</sup>lt;sup>282</sup> 5000 supporting signatures in the case of political parties, 7,000 in the case of coalitions and 1% of the number of voters in the respective constituency, but in any case, not more than 3,000 signatures in the case of independent candidates. <sup>283</sup> The Code of Good Practice in Electoral Matters of Venice Commission (I.1.3.i) suggests that the number of supporting signatures shall not exceed 1% of registered voters.

<sup>&</sup>lt;sup>284</sup> Meanwhile, its activists consider themselves part of the same nationwide movement of the political party Self-Determination Movement in Kosovo and are involved in joint activities. See: <a href="https://shqiperi.vetevendosje.org/pyetje-te-shpeshta/">https://shqiperi.vetevendosje.org/pyetje-te-shpeshta/</a>. The leader of the Self-Determination Movement in Kosovo and current Prime Minister of Kosovo, Albin Kurti, visited Albania and participated in activities which were organized to introduce the candidates supported by the Self-Determination Centre in Albania in March this year.

<sup>&</sup>lt;sup>285</sup> Albin Kurti: "After Kosovo, also Albania needs changes" https://www.youtube.com/watch?v=nz8sncgiui4

<sup>&</sup>lt;sup>286</sup> Eleven political parties and three initiating commissions, despite being registered as election contestants, did not submit multi-name candidate lists or supporting signatures for independent candidates, which resulted in their de facto withdrawal from the electoral race.

<sup>&</sup>lt;sup>287</sup> "Democratic Party - Alliance for Change" Coalition and "ABEOK" Coalition.

<sup>&</sup>lt;sup>288</sup> Mr. Plarent Aleksi, MP candidate for proposed by voters in Berat region; Mr. Boiken Abazi, MP candidate proposed by voters in Tirana region; Mr. Iljaz Shehu, MP candidate proposed by voters in Lezhë region; Mr. Kreshnik Merxhani, MP candidate proposed by voters in Gjirokastër region; Mr. Pal Shkambi, MP candidate proposed by voters in Shkodra region.

<sup>&</sup>lt;sup>289</sup> Tirana Region, Gjirokastër Region, Lezhë Region, Shkodra Region and Berat Region.

<sup>&</sup>lt;sup>290</sup> 1836 candidates from political parties and coalition and five independent candidates.

## VI.1. Registration of political parties

The rules for the registration of political parties in electoral processes are set out in the Law on Political Parties and the Electoral Code<sup>291</sup>. Specifying these laws, CEC approved the instruction<sup>292</sup> on the rules of registration of election contestants.

According to the Electoral Code, the legal deadline for the registration of political parties was 15 February 2021, while for electoral coalitions was 25 February 2021<sup>293</sup>. Meanwhile, according to the Instruction<sup>294</sup> on the rules of registration of election contestants, CEC shall verify the documentation submitted by political parties within two days of its filing.

The State Election Commissioner, in the public meeting of 22 February 2021, decided the registration of nine political parties, while four parties that had shortcomings in the submitted documentation, were not registered<sup>295</sup>. Based on the review of the reports of the respective draft decisions for the registration of these parties, it results that the requests, including the completion of the documentation, were submitted to CEC within the legal deadline, but the actual decision-making was beyond this legal deadline.

The process of registration of political parties in CEC was carried out in accordance with the legal provisions specified in the bylaws of CEC, which were in constant communication with the parties in order to complete the documentation as quickly and efficiently as possible.

It is considered a positive step to comply with any requirement of the instruction, especially that of opening and publishing a special bank account number by any political party that submits the request to be registered for elections.

#### VI.1.1. The mandate of the party chairman according to the party statute

The legal framework defines the list of documents that political parties shall submit in order to be registered as an election contestant. The documentation is generally formal and does not include any

<sup>&</sup>lt;sup>291</sup> Electoral Code of the Republic of Albania, Article 64 "Registration of political parties in elections" point 1.

<sup>&</sup>lt;sup>292</sup> <u>Instruction No. 1, dated 23.12.2020</u>, the State Election Commissioner, "On determining the rules for the submission and verification of candidacy documentation, deadlines for the publication of candidate lists and the approval of candidacy models".

<sup>&</sup>lt;sup>293</sup> Electoral Code of the Republic of Albania, Article 64, "Registration of political parties in elections" point 1.

<sup>&</sup>lt;sup>294</sup> Instruction No. 1, dated 23.12.2020, State Election Commissioner, Article 1 "Registration of political parties" point

<sup>&</sup>lt;sup>295</sup> The Labor Party of Albania, the Centrist Party of the Albanian People's Welfare and the Party for the Protection of Workers' Rights have not submitted to CEC the number of the special bank account opened by the party; regarding the Party of Albanian Emigration, the request was compiled and signed by a member of the party and not by its chairman or a person authorized by him. Meanwhile, this party was previously registered as an election contestant through its chairman.

mechanism for the Central Election Commission to verify whether a political party operates in accordance with the constitutional and legal principles of internal democracy<sup>296</sup>.

One of these principles, which is clearly not respected by some political parties registered as election contestants for the elections of 25 April, is the validity of the mandate of the party chairman (referring to the statute of the respective parties themselves), the lack of a time limited mandate of the chairman in the statute, or the fact of not conducting periodic elections regarding the election of governing forums according to the party statute.

Based only on this element, if the Central Election Commission had the legal rights to ban the candidacy of parties as election contestants, 22 parties would not have been registered.

Specifically, referring to the observation of the acts of registration of political parties in the Judicial District Court of Tirana, in relation to 46 parties registered in CEC for the elections of 25 April 2021, it results that:

i. 20 parties<sup>297</sup> are considered to have chairmen within the legally valid term of exercising the mandate, as defined in the relevant statute.

<sup>&</sup>lt;sup>296</sup> Article 9, point 1 of the Constitution stipulates that "The organization [of political parties] shall be in compliance with democratic principles." Article 7, point a. of the Law on Political Parties, takes this one step further by specifying that it is not allowed to register a political party when "the internal organization [...] is contrary to democratic principles and, in particular, to the following principles: bottom-up organization of the party, democratic internal elections for party forums

<sup>297</sup> Movement for Change Party, the current chairman was elected after the decision of the Judicial District Court of Tirana,

298 Movement for Change Party, the current chairman elected after the decision of the Judicial District Court of Tirana, dated 19.10.2020; - The ORA Party of Albania, the current chairman was remade official after the decision of the Judicial District Court of Tirana, dated 23.11.2017; - Democratic Conviction Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 25.04.2019; - Legality Movement Party, the current chairman was remade official after the decision of the Judicial District Court of Tirana, dated 23.12.2017; - The Party for Justice, Integration and Unity, the current chairman was remade official after the decision of the Judicial District Court of Tirana, dated 28.02.2017; - Albanian Democratic Reform Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 15.03.2019; - The Christian Democratic Party of Albania, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 10.05.2017; - Agrarian Environmentalist Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 21.07.2016; - The Christian Democratic Party of Albania, the current chairman was remade official after the decision of the Judicial District Court of Tirana, dated 14.01.2016; - The New Democracy Alliance Party, the current chairman was elected after the decision of the Judicial District Court of Tirana, dated 12.01.2021; - The Party of Socialist Movement for Integration, the current chairwoman was remade official after the decision of the Judicial District Court of Tirana, dated 15.01.2021; - The Social Democratic Party, the current chairman was elected after the decision of the Judicial District Court of Tirana, dated 04.02.2021; - New Movement Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 28.12.2020; - Albanian Labor Movement Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 27.04.2015; - The Hashtag Initiative Party, the current chairman was elected after the decision of the Judicial District Court of Tirana, dated 15.01.2021; - National Conservative Party of Albania, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 20.02.2017; - The Party of Alliance for European Equality and Justice, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 20.09.2017; - Albanian Civic Party, the current chairman was elected after the decision of the Judicial District Court of Tirana, dated 01.10.2020;

- ii. 4 parties<sup>298</sup> are considered to have their chairmen within the valid term of their mandate of representation, although it does not result in a mandate limited in years, explicitly defined in the relevant statute (in this case the seven-year mandate is calculated as the longest valid term during the time recorded in the entire submitted list of parties).
- iii. 6 parties<sup>299</sup> are considered to have their chairmen beyond the valid legal term of exercising the mandate, as defined in the relevant statute.
- iv. 16 parties<sup>300</sup> are considered to have their chairmen beyond the valid term of their mandate of representation, although it does not result in a term limited in years, defined in the statute.

- The Red and Black Alliance Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 19.12.2017.

<sup>298</sup> Democratic Alliance Party, the chairman was made official after the decision of the Judicial District Court of Tirana, dated 22.05.2014; - Democratic Party, last file submitted in Court in 2013. According to the DP statute, the mandate of the party chairman is four years. The current chairman of the Democratic Party was elected by the party membership on 22.07.2017, but these changes do not appear to have been reflected before the Court; - Socialist Party of Albania, last file was submitted in Court in 2013. According to the statute of the SP, published on the official website, amended in 2016, the mandate of the party chairman is considered renewed when he/she is elected prime minister. However, these amendments do not appear to have been reflected before the Court. For further information see the Statute of the Socialist Party of Albania, dated 19.03.2016, Article 40, "Election of the Chairman of the Party", point 5; - The New Democratic Spirit Party, the chairman was made official after the decision of the Judicial District Court of Tirana, dated 20.04.2015. <sup>299</sup>- National Front Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 16.02.2004, despite the fact that the party statute explicitly states that the mandate of the party chairman is four years; - The Christian Democratic Alliance of Albania, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 07.12.2010, despite the fact that the party statute explicitly states that the term of office of the party chairman is three years; - The Party of People's Union of Albanian Pensioners, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 24.04.2009, despite the fact that the party statute explicitly states that the mandate of the party chairman is four years; - The National Alliance Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 01.06.2007, despite the fact that the party statute explicitly states that the mandate of the party chairman is four years; - Law and Justice Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 17.02.2009, despite the fact that the party statute explicitly states that the mandate of the party chairman is four years: - The Party for the Protection of Emigrants' Rights, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 18.02.2002, which is also the decision to register this party in the Court, despite the fact that the party statute explicitly states that the mandate of the party chairman is four years.

<sup>300</sup> The Party of Alliance for Democracy and Solidarity, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 03.03.2009, which is also the decision to register this party in the Court; - The Party of Albanian Affairs, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 09.11.2004, which is also the decision of registration of this party; - The Party of National Unity, the current chairman was made official upon the Order of the Minister of Justice, dated 15.03.1991, which is also the decision of registration of this party; - National Front Democratic Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 28.05.2005; - Albanian Democratic Union Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 18.05,2005: - The Republican Party of Albania, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 22.05.2005; - The Party of Movement for National Development, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 16.06.2008; - The Communist Party of Albania, the chairman was made official after the decision of the Judicial District Court of Tirana, dated 17.12.2012; - Party of the Union for Human Rights, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 11.03.2002; -The Party of Greek Ethnic Minority for the Future, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 10.06.2002, which is also the decision of registration of this party; - The Party of Liberal Democratic Union, the current chairman was made official after the decision of the Judicial District Court of In order to ensure the operation of political parties in accordance with the democratic norms sanctioned by the Constitution, the law on political parties shall clearly state that the mandate of the party chairman and its governing bodies shall have a certain duration (a ceiling duration may be provided by law) and that the party shall hold elections within the time limit set by law.

In addition to the above, the legal framework shall define the verification mechanisms and sanctions against the political party that does not meet this legal norm. It can be considered that one of the duties of CEC is to verify the minimum criteria of internal democracy of the party, setting it as a registration requirement in order to be registered as an election contestant.

#### VI.2. Registration of electoral coalitions

Two or more political parties registered as election contestants at CEC may register as an electoral coalition no later than 60 days before the election date<sup>301</sup>. At the time of registration, the coalition shall declare the leading political party of the coalition, which is responsible for fulfilling all tasks deriving from the Electoral Code. The political parties that are members of a coalition shall sign cooperation agreements among them, in order to define the mutual rights and duties. This agreement is filed to the Central Election Commission.

Regarding the elections of 25 April 2021, CEC registered three electoral coalitions: "Democratic Party - Alliance for Change" coalition which consisted of 13 political parties<sup>302</sup>; "Alliance" Coalition which consisted of 7 political parties<sup>303</sup> and the "Alliance of People's Union - Emigration - Hour of Hope and Conservatives" Coalition, which consisted of four political parties<sup>304</sup>. After the completion

Tirana, dated 13.04.2005; - Social Democracy Party, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 07.05.2003, which is also the decision of registration of this party in the Court; - Albanian Party Fatherland, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 09.04.2013, which is also the decision of the registration of this party; - The Party of Albanian Emigration, the current chairman was made official upon the Order of the Minister of Justice, dated 16.07.1998, which is also the decision of registration of this party; - The Party of National Reconciliation, the current chairman was made official upon the Order of the Minister of Justice, dated 24.12.1997, which is also the decision of registration of this party; - The Party of People's Alliance, the current chairman was made official after the decision of the Judicial District Court of Tirana, dated 11.04.2013.

<sup>&</sup>lt;sup>301</sup> Electoral Code of the Republic of Albania, Article 64 "Registration of electoral coalitions".

<sup>&</sup>lt;sup>302</sup> Legality Movement Party, the Party for Justice, Integration and Unity, Christian Democratic Party of Albania, National Front Democratic Party, Agrarian Environmentalist Party, the Party of Albanian Democratic Union, Christian Democratic Party, Democratic Party, Albanian Republican Party, the Party of Union for Human Rights, the Party of Liberal Democrat Union, New Democratic Spirit Party, Movement for National Development.

<sup>&</sup>lt;sup>303</sup> Albanian Democratic Alliance Party, Alliance for Democracy and Solidarity, Alliance for European Equality and Justice Party, Albanian Democratic Reform Party, Party for the Protection of Emigrant Rights, Albanian Labor Movement Party, Albanian Civic Party.

<sup>&</sup>lt;sup>304</sup> Albanian ORA Party, National Conservative Party of Albania, People's Union of Albanian Pensioners Party, Albanian Emigration Party.

of the candidate registration process, it resulted that only two coalitions managed to complete 305 the necessary documentation in order to be represented as election contestants on the ballot paper<sup>306</sup>.

Due to legal amendments, which force pre-election coalitions to present a single list of candidates, the Democratic Party and the Socialist Movement for Integration signed an agreement by which they publicly committed to a post-election coalition<sup>307</sup>.

#### VI.3. Registration of candidates

The political party or coalition shall submit to CEC the multi-name list of candidates for each electoral zone no later than 50 days<sup>308</sup> before the election date.

A candidate can only be included in the list of one electoral zone (region) and only in the list of a certain party<sup>309</sup>. Exceptions to this rule are the leaders of political parties, who, according to the unilateral amendments of 5 October 2020 of the Electoral Code<sup>310</sup>, can run in four electoral zone, with the right to choose the mandate they will hold, if they win in more than one electoral zone.

The chairman of several parties exercised this right, including the chairman of the SP, the SMI and the SDP<sup>311</sup>. KRIIK considers that this legal provision violates the principle of equality of candidates in the race.

<sup>&</sup>lt;sup>305</sup> The Alliance Coalition was denied the request for registration of multi-name lists, after submitting a certification from the Assembly for holding seats in the Assembly in a lower number than the number of parties that were part of the Coalition. Even after appealing to the CSC and the Electoral College, decision no. 165, dated 18.03.2021 of the State Election Commissioner "On the review of the request for approval of the multi-name lists of the Alliance (AL) coalition, for the Assembly elections of April 25, 2021" did not change.

<sup>&</sup>lt;sup>306</sup> The Alliance Coalition, which consisted of seven political parties, submitted to CEC the request for registration of multi-name lists, accompanied by a certification from the Albanian Assembly for holding a mandate in the Assembly. Even after the completion of the procedure of completing the documentation, due to the lack of proof of holding the required number of mandates, which in this case should have been seven, this list was not registered. The representative of this coalition at CEC, raised the claim that the number of member parties of the coalition, for the purpose of registration by CEC, has changed from seven to two. Highlighting the fact that the coalition had already been registered with CEC and consequently its constituent parties are in place, the SEC decided by Decision No. 165, dated 18.03.2021 "Refusal of the multi-name lists of the Alliance Coalition". The decision of the Commissioner was appealed to the CSC, which with Decision No. 6, dated 24.03.2021, with unanimous votes left in force the decision of the Commissioner not to register the list of candidates of the Alliance coalition. Even the Electoral College after reviewing this case with Decision No. 4, dated 31.03.2021 upheld the decision of the Commissioner.

<sup>&</sup>lt;sup>307</sup> DP and SMI competed in elections with two lists (PD-AC + SMI), to achieve a full and comprehensive politicalelectoral representation, according to public statements made by them. Representation at all levels of future government would be proportionally based on the election result.

<sup>&</sup>lt;sup>308</sup> Electoral Code of the Republic of Albania, Article 67 "List of candidates of parties and coalitions of parties", point 1. <sup>309</sup> Ibid, point 3.

<sup>311</sup> The Socialist Party chairman ran in two electoral zones; The chairwoman of the Socialist Movement for Integration Party ran in 3 electoral zones; The chairman of the Social Democratic Party ran in 2 electoral zones; Hashtag Initiative Party Chairman ran in 4 electoral zones; The chairwoman of the Movement for Change Party ran in 4 electoral zones;

The process of registering the multi-name list of candidates for political parties which have mandates in the Albanian Assembly, consists only of completing the administrative documentation. Meanwhile, the registration of candidates proposed by political parties which do not have any mandates in the Assembly must be supported by no less than 5,000 voters, or in the case of coalitions by no less than 7,000 voters nationwide<sup>312</sup>. An exception to this coalition rule is when the member parties jointly hold in the Assembly a number of mandates not less than the number of members of the coalition.

11 political parties<sup>313</sup> and three coalitions<sup>314</sup> submitted multi-name lists to CEC, until 8 March 2021. The lists of candidates submitted by 13 subjects<sup>315</sup> were returned for correction by CEC<sup>316</sup>, due to deficiencies in the documentation, which were mainly related to the number of candidates on the list<sup>317</sup>, non-compliance with gender criteria<sup>318</sup>, deficiencies in accompanying documentation such as identification document, self-declaration forms, etc.<sup>319</sup>. Following the completion of the correction process, the lists of two election contestants<sup>320</sup> were not approved by the Commissioner.

The Socialist Movement for Integration Party and the Democratic Party, due to the decision to withdraw MPs from parliament in January 2019, were non-parliamentary parties on the eve of these elections. This meant that the only way to register candidate lists for these elections would be to collect signatures<sup>321</sup>.

From the review of the supporting documentation, it results that the SMI has been registered through the submission of a certification from the Albanian Assembly<sup>322</sup> for holding a mandate for a member of parliament.

Whereas the DP-AC Coalition registered the multi-name lists in CEC through the submission of supporting signatures. Specifically, the DP presented 14,750 supporting signatures.

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National Front Party Chairman ran in 4 electoral zones, and Albanian Democratic Movement Party Chairman ran in 4

<sup>&</sup>lt;sup>312</sup> Ibid., Article 68 "Supporting lists of political parties and coalitions" point 1.

<sup>313</sup> Socialist Movement for Integration, New Movement Party, Movement for Change Party, New Democracy Alliance Party, Albanian Democratic Movement Party, Hashtag Initiative Party, National Front Party, Democratic Conviction Party, Social Democratic Party and Socialist Party of Albania.

<sup>314 &</sup>quot;Alliance for Change - Democratic Party" Coalition, "Alliance" Coalition, "Alliance of People's Union - Immigration - Hour of Hope and Conservatives" Coalition.

<sup>315</sup> All subjects had deficiencies in documentation, except the Socialist Movement for Integration party.

Electoral Code of the Republic of Albania, Article 73 "Verification of documentation", point 1

<sup>&</sup>lt;sup>317</sup> Ibid., Article 67 "List of candidates of parties and coalitions of parties" point 4.

<sup>&</sup>lt;sup>318</sup> Ibid., Article 67 "List of candidates of parties and coalitions of parties" point 6.

<sup>&</sup>lt;sup>319</sup> Ibid., Article 72, "Candidacy documents".

<sup>&</sup>lt;sup>320</sup> Multi-name list of candidates proposed by the "Alliance" coalition and multi-name list of candidates proposed by the National Alliance party.

<sup>&</sup>lt;sup>321</sup> Electoral Code of the Republic of Albania, Article 68 "Supporting lists of political parties and coalitions" point 1.

<sup>322</sup> Certification of the Assembly of Albania, no. 499/1 dated 16.02.2021, which confirms that based on the statement submitted to the Assembly, MP Gjetan Gjetani has declared membership in the political party Socialist Movement for Integration.

The instruction<sup>323</sup> approved by the State Commissioner for Elections specified the submission and publication on the official website of the candidates' CVs as an obligation for the candidates.

The relevant approved format was very simple, and such as to allow candidates to avoid the obligation to provide full transparency on their education, background, engagement and their past. Regarding the need for a complete presentation of the CV and the candidate's engagements, referring to the experience of previous elections, KRIIK sent to CEC, before the approval of this instruction, suggestions<sup>324</sup> for improving the CV format.

From the review of the CVs of the candidates, it was noticed that about 50% of the candidates had published a CV that contained almost no data, or the data were very general, lacking the necessary information, minimal for the effect of which the publication of CV was deemed important.

## VI.3.1. Number of candidates in the DP-AC list

The Electoral Code<sup>325</sup> which provides for the number of candidates for each electoral zone, was amended by the electoral reform undertaken in 2020<sup>326</sup>. According to the calculations of this article, the number of candidates that each election contestant had to submit is 153 candidates.

Some subjects submitted lists with more candidates than the required number. This was the cause or one of the reasons for the return by the Commissioner of the lists for review in by these subjects.

The subject that did not reflect changes in the list even after returning for review was the Democratic Party, which did not change the list submitted to CEC with 222 candidates. Following the process and in coherence with the previous decision-making, the Commissioner decided to register the DP list by "deleting" the candidates found in excess of the required number in the list.

Despite a coherent position of the Commissioner on the interpretation of the norm regarding the number of candidates, CSC did not reflect the same position in its decision-making<sup>327</sup> for this case, identifying CEC in this case not as a single institution.

<sup>323 &</sup>lt;u>Instruction No. 01, dated 23.12.2020</u> State Election Commissioner "On determining the rules for the submission and verification of candidacy documentation, deadlines for the publication of candidate lists and the approval of candidacy templates".

<sup>&</sup>lt;sup>324</sup> KRIIK, <u>Opinion</u>. December 2020, On the draft instruction "On determining the rules for the submission and verification of candidacy documentation, deadlines for the publication of candidate lists and the approval of candidacy templates".

<sup>325</sup> Electoral Code, Article 67, "List of candidates of parties and coalitions of parties", point 4.

<sup>&</sup>lt;sup>326</sup> <u>Law No. 118/2020 dated 5.10.2020.</u> The Assembly of Albania, on some additions and amendments to law no. 10019, dated 29.12.2008, "Electoral Code of the Republic of Albania", amended.

<sup>&</sup>lt;sup>327</sup> <u>Decision No. 9</u>, <u>dated 23.03.2021</u>, Complaints and Sanctions Commission "On the review of the appeal request no.05, dated 19.03.2021 of the Democratic Party - Alliance for Change against the decision of the State Election Commissioner no.156, dated 17.03.2021."

The case continued with an appeal to the Electoral College, which by a four-to-one vote decided<sup>328</sup> to uphold the decision of the Commissioner, and the DP-AC coalition to be represented in the list of candidates with 153 members of parliament.

This process caused difficulties and delays in following the procedures in time, not only for the final form of the ballot paper, which was necessary for an effective campaign of information and awareness of the voters, but also in the procurement procedures with the company for the production of the ballot paper.

In addition, it is evident that not finalizing a more compact list within the number required by law is problematic, and so is the lack of selection and prior consultation within the forums of the political subject. This situation turns the selection and being a candidate into a fulfillment of mutual desires or "obligations" of narrow political interests.

#### **VI.4. Decriminalization Process**

The Central Election Commission has a key role in protecting and guaranteeing the democratic functioning of the Assembly from the influence or participation in policymaking and/or decision-making of persons against whom the law has imposed prohibitions on holding and exercising a public position<sup>329</sup>.

In function of the process of registration of candidates for members of parliament in the elections of 25 April 2021, CEC administered the self-declaration forms, and before deciding to register the respective lists of subjects, it carried out the process of verifying them, formally requesting information from the General Directorate of Civil Status and the General Directorate of Prisons, as provided by law.

Due to the tight deadlines, which dictate the implementation of verification for involvement in the sphere of prohibition of decriminalization law, for any element that can be overcome during this phase, CEC has the right to refer cases to the General Prosecution Office at any time for in-depth verifications or investigations<sup>330</sup>.

<sup>330</sup> Ibid.

Decision No. 3 dated 29.03.2021, Judicial Electoral College, Decision "On the review of the appeal request No. 05 dated 19.03.2021, of the Democratic Party - Alliance for Change DP-AC Coalition) with the object "Objection to Decision No. 156, dated 17.03.2021 of the State Election Commissioner".

<sup>&</sup>lt;sup>329</sup> Persons who have been convicted or against whom security measures have been taken, or have been convicted for committed crimes with an inconclusive decision, according to the provisions of Law no. 138/2015, dated 17.12.2015, "On guaranteeing the integrity of persons elected, appointed or exercising public functions" (the so-called decriminalization law), as well as <a href="Decision No. 17">Decision No. 17</a>, dated 04.03.2016, The Assembly of Albania, published in the Official Journal of the Republic of Albania 10.03.2016.

The self-declaration forms for each candidate are submitted to CEC<sup>331</sup> by the relevant political subject. Referring to the legal framework<sup>332</sup>, these forms must be clearly filled in at a computer, signed on each sheet and submitted to CEC in electronic and printed form. Upon completion of the registration, CEC published the forms on the official website.

It is noticed that there are nine candidates for whom this form was not only not published in time but is still unpublished<sup>333</sup>.

From the review of the published self-declaration forms, it is noticed the problem of using handwriting when filling in the forms by 972 candidates (53%)<sup>334</sup>, representatives of 11 election contestants<sup>335</sup>, as well as for two independent candidates<sup>336</sup>. Filling in the Self-Declaration Form correctly is very important, not only in terms of respecting the law, but to avoid any possibility of confusion or misreading in the candidates' declarations.

For criminal offenses occurring within the territory of the Republic of Albania, and/or changes of personal information, or any coercive measures previously imposed on each candidate, and/or declared by them, CEC performed the *prima facie* verification of the candidates' self-declaration forms whether they were included in the scope of action of article 2 of law no. 138/2015.

In view of this verification, CEC sent a written request to the General Directorate of Civil Status (GDCS) and the General Directorate of Judicial Status (GDJS). From the review of the decisions of

<sup>&</sup>lt;sup>331</sup> Instruction No. 2, dated 29.01.2013. The Central Election Commission, "On setting the rules for the submission and verification of candidacy documentation and deadlines for the publication of candidate lists", amended by Decision no. 44 dated 17.02.2017 "On some additions and amendments to the instruction no. 2, dated 29.01.2013 "On setting the rules for the submission and verification of candidacy documentation and deadlines for the publication of candidate lists" and Decision no. 22 dated 01.02.2019 "On some additions and amendments to the instruction no. 2, dated 29.01.2013 "On setting the rules for the submission and verification of candidacy documentation and deadlines for the publication of candidate lists" Decision No. 17/2016, dated 04.03.2016 of the Assembly of Albania, "On determining the detailed rules on the implementation of the prohibitions provided in law no. 138/2015 "On guaranteeing the integrity of persons elected, appointed or exercising public functions".

<sup>333</sup> Ms. Entela Muça and Mr. Ermal Muçaj, candidates of the multi-name list of the Social Democratic Party in the Elbasan Region and Mr. Sejdi Babaliu candidate in Berat Region. Mr. Flamur Alimadhi, candidate of the multi-name list of the National Front Party, Durres Region and Mr. Gëzim Hysenllari, candidate for Tirana region. Mr. Flogert Muça candidate of the multi-name list of the Hashtag Initiative Party of Vlorë, and Marsel Rupi the candidate of the multi-name list of Durres Region. Ms. Drita Duka candidate of the multi-name list of the Coalition Alliance Popular Union - Emigration - Hour of Hope and Conservatives, Vlorë Region. Ms. Anxhela Zavalani, candidate of the multi-name list of the Democratic Conviction Party, Tirana Region.

<sup>&</sup>lt;sup>334</sup> Out of the total of 153 candidates in the multi-name list of each competing subject, the self-declaration form was completed in handwriting by: 123 candidates of the AUEHC coalition, 74 candidates of the Democratic Party-Alliance for Change Coalition, 142 candidates of the New Democracy Alliance Party, 151 candidates of the National Front Party, 84 candidates of the Democratic Conviction Party, 3 candidates of the Albanian Democratic Movement Party, 63 candidates of the New Movement Party, 101 candidates of the Movement for Change Party, 144 candidates of the Hashtag Initiative Party, 59 candidates of the Social Democratic Party, 28 candidate of the Socialist Party of Albania.

<sup>335</sup> This practice has been applied by all subjects except the Socialist Movement for Integration party.

<sup>&</sup>lt;sup>336</sup> Mr. Plarent Aleksi, independent candidate, in Berat Region. Pal Shkambi, independent candidate, in Shkodra Region.

the Commissioner, it is concluded that the GDCS has not returned a response about any of the lists submitted for review<sup>337</sup>, while the GDJS responded only about the lists of 9 subjects out of 12<sup>338</sup>.

This lack of cooperation from state institutions in fulfilling a legal obligation to the Central Election Commission during an electoral process, especially in relation to such a key process as decriminalization shows, at the very least, negligence in fulfilling the legal obligations of these institutions.

The rules for completing the self-declaration form are included in the decision of the Albanian Assembly<sup>339</sup>, according to which the reflection of untrue, incomplete, and inaccurate data in the self-declaration form entails the immediate, and at all time exclusion from the candidacy/election/appointment or from the public function, as well as constitutes a criminal offense<sup>340</sup>.

Referring to the forms of self-declaration of the candidates and the response of the General Directorate of Prisons, a candidate did not declare data on the judicial status in the form<sup>341</sup>, but based the official response of the GDJS to CEC, it turned out that he had been convicted. Despite this situation the candidate was allowed to run.

The decision of the Commissioner for the final registration of the lists of candidates of each subject includes the data stated in the form for each candidate of that subject, even when he/she is not in the sphere of prohibition of candidacy according to law 138/2015. According to these decisions, 42 candidates from all election contestants have declared sentences which are not included in the sphere of prohibition, but from the examination of the forms, it turns out that there are 63 candidates with such data included in the self-declaration form.

Meanwhile, from the examination of each form, it results that there are 54 candidates<sup>342</sup> who have declared changes of personal information, name, surname, date of birth or even change of name and

<sup>&</sup>lt;sup>337</sup> With the exception of the request for the independent candidate Mr. Pal Shkambi. Referring to the data declared in the self-declaration form of this subject, the change of the birth date is evidenced.

<sup>&</sup>lt;sup>338</sup>The GDJS did not respond to the subjects: Alliance of People's Union - Emigration - Hour of Hope and Conservatives Coalition (AUEHC), Social Democratic Party (SDP) and Democratic Party "Alliance for Change" Coalition (DP-AC).

<sup>&</sup>lt;sup>339</sup> <u>Decision No. 17/2016</u>, dated 04.03.2016. The Assembly of Albania, On the determination of the detailed rules on the implementation of the prohibitions provided in Law no. 138/2015, "On guaranteeing the integrity of persons elected, appointed or exercising public functions" Chapter III, Content, effects and template of the self-declaration form.

<sup>&</sup>lt;sup>340</sup> <u>Criminal Code of the Republic of Albania,</u> Article 190, "Counterfeiting of stamps, seals or forms" (Amended by law no. 9188, dated 12.2.2004, article 6; added by law no. 9275, dated 16.9.2004, article 15; repealed by the decision of the Constitutional Court No. 47, dated 26.7.2012, the part that provides for a fine as the main punishment).

<sup>&</sup>lt;sup>341</sup> From the monitoring of the self-declaration form, it is evidenced that the candidate for MP of the political subject "Hashtag Initiative" Mr. Napolon Laska did not report data on the judicial situation in the self-declaration form submitted to CEC. While based on the confirmation of the judicial status No. 17 Prot., dated 09.03.2021, with decision no. 219 dated 22.05.2018, the Judicial District Court of Fier has found him guilty of the criminal offense of "Obstruction of the circulation of road transport vehicles", provided by Article 293, 55 of the Criminal Code and Article 406 CPC, who was sentenced to 3 (three) months imprisonment. Pursuant to Article 59 of the Criminal Code, it is ordered to suspend the execution of the sentence for 6 (six) months' probation. Rehabilitated under Article 69 of the Criminal Code.

Twenty-seven candidates have changed their name, eight of whom are part of the multi-name list of the AUEHC Coalition, six candidates are part of the multi-name list of the Socialist Party, three candidates are part of the multi-name list of the Socialist Movement for Integration, two candidates are part of the multi-name list of the DP-AC Coalition, one

surname at the same time, as well as 42 candidates out of 1,841 have declared in forms data corresponding to final sentences by the courts<sup>343</sup>. Candidates are part of the multi-name lists of 11 subjects<sup>344</sup>.

Eight<sup>345</sup> candidates turn out to have declared in the decriminalization form 13 prison sentences, three of whom have declared more than one prison sentence, with a time span of ten days to six years.

candidate belongs to the Democratic Conviction Party, one candidate belongs to the New Democracy Alliance, four candidates belong to the multi-name list of the New Movement Party and two candidates belong to the Movement for Change Party.

Mr. Ido Pashaj, candidate of the multi-name list of the Coalition Alliance Popular Union Emigration - Hour of Hope and Conservatives Fier Region has been convicted by the Vlorë Regional Court, for the criminal offense "Agitation, Propaganda", according to Article 55 of the Constitution, six years in prison.

Mr. Tom Doshi candidate of the multi-name list of the Social Democratic Party Shkodra Region was sentenced by the Military College of the Durres District Court to one year in prison on 25.05.1990 for misconduct in society under Article 121 and 31/a of the Criminal Code.

Mr. Ferdinand Aligioni candidate of the multi-name list of the Socialist Movement for Integration Party Vlorë Region, with decision no. 276 dated 06.12.1989, the Vlorë District Court found him guilty of the criminal offense of "Theft of Civic Property", provided by Article 101/1 of the Criminal Code and sentences him to 6 (six) months imprisonment.

Mr. Gjergji Thanasi candidate of the multi-name list of the Coalition Alliance Popular Union Emigration - Hour of Hope and Conservatives Durres Region has stated that with decision no. 119 dated 31.07.1990, the Judicial District Court of Durres sentenced him for two criminal offenses, respectively 6 (six) months imprisonment and another sentence of 45 days imprisonment, but the candidate did not specify the data for the criminal offense.

Mr. Pal Shkambi Independent candidate in Shkodra Region, in 1982 was convicted by the Shkodra Judicial District Court, charged with the criminal offense, Embezzlement of Socialist Property, for political motives, a criminal offense for which he was sentenced to 2 (two) years imprisonment.

In 1983, he was convicted by the Shkodra Judicial District Court, charged with the criminal offense, Embezzlement of Socialist Property, for political motives, a criminal offense for which he was sentenced to 20 (twenty) months imprisonment.

Mr. Edi Paloka, candidate of the multi-name list of the Democratic Party - Alliance for Change Coalition, Durres Region, has been given the security measure of arrest and imprisonment, a measure which has been revoked by the Court of First

<sup>-</sup> Eighteen candidates have changed their surnames, of which two candidates belong to the political subject Socialist Party, two candidates belong to the Social Democratic Party, three candidates belong to the Socialist Movement for Integration, one candidate belongs to the AUEHC Coalition, six candidates belong to the DP-AC Coalition, one candidate belongs to the New Democracy Alliance Party, one candidate belongs to the New Movement Party and two candidates belong to the Hashtag Initiative Party.

<sup>-</sup> Six candidates have changed their date of birth, of which, two belong to the Socialist Party, one candidate belongs to the Democratic Party, one candidate belongs to the Socialist Movement for Integration and an Independent candidate.

<sup>-</sup> Three candidates have changed both the name and the surname, of which two candidates belong to the New Movement Party and one candidate belongs to the Coalition Democratic Party Alliance for Change.

<sup>&</sup>lt;sup>343</sup> Of these, 34 have declared administrative sentences with fines or alternatives, such as probation, work in the public interest, fine, obligation to appear, etc.

<sup>&</sup>lt;sup>344</sup> Three candidates of the AUEHC Coalition, one Independent Candidate, three candidates of the Socialist Party of Albania, one candidate of the Movement for Change Party, four candidates of the Social Democratic Party, one candidate of the Hashtag Initiative Party, eight candidates of the Socialist Movement for Integration Party, four candidates of the Democratic Conviction Party, three candidates of the New Movement Party, one candidate of the New Democracy Alliance Party, two candidates of the Albanian Democratic Movement Party, one candidate of the Democratic Party.

<sup>&</sup>lt;sup>345</sup> Mr. Ardian Nikulaj candidate of the multi-name list of the Social Democratic Party, Lezhë Region. Lezhë Court with decision no. 124 dated 24.11.2003, sentenced him for the criminal offense provided by Article 278, for which he was sentenced to 4 (four) months. The court of Trieste, Italy in the period 1997-1999 he was sentenced to 21 months in prison for the criminal offense "Beating". The Vlorë Court in the period 1986-1991 sentenced him to two years in prison for "Political" reasons.

## VI.4.1. Referral for in-depth verification to the General Prosecution Office

The two election contestants, the Socialist Party and the Democratic Party, made mutual accusations of inclusion in the candidate lists of individuals affected by the decriminalization law. These accusations were made through public statements in the media, and also served as clues for CEC, to refer these cases to the General Prosecution Office for a more in-depth investigation.

CEC referred 30 candidates for in-depth verification to the General Prosecution Office, of which 28 were representatives of nine election contestants and two were independent candidates<sup>346</sup>. In-depth verification by the Prosecution is also requested for candidates who have not stated in the decriminalization form<sup>347</sup> any suspicious data.

Also, in addition to CEC, the Democratic Party of Albania has forwarded a candidate<sup>348</sup> for in-depth verification to the General Prosecution Office. This is the first case when an election contestant requests verification from the Prosecution for a candidate, whom he has placed himself in the lists of candidates. This is a practice that, in KRIIK's judgment, should be applied by the parties before submitting the names of the candidates to CEC, as a stage that would assist CEC in the verification process, and consequently the citizens, in order to avoid selection of candidates with problems in cleanliness of their figure.

From the official communication of KRIIK with the General Prosecution Office, according to the latter, the verification process has been completed for only 10 candidates<sup>349</sup>, and is in process for the rest. Of all the lists submitted for verification, only one candidate<sup>350</sup> took the mandate of member of parliament but resigned afterwards. *De facto* verification of the Prosecution will remain a procedure

Instance of Tirana, for the criminal offense "Illegal rally for strong opposition against the police forces", dated 30.01.2000, for which a final decision was imposed on imprisonment for a period of 10 (ten) days.

Mr. Bahri Shabani candidate of the multi-name list of the Democratic Conviction Party, Shkodra Region, Darmstad Court, Germany, has sentenced him to about one month in prison for the criminal offense of Illegal Emigration, change of identity, pretending to be a Kosova citizen.

<sup>&</sup>lt;sup>346</sup> AUEHC *Coalition:* Mr. Altin Gjeloshaj, Ms. Elsa Voka, Mr. Daniel Prroj, Mr. Ervis Beu, Mr. Ido Pashaj; - *Socialist Movement for Integration Party:* Mr. Arbër Arifaj, Mr. Ashim Tafilaku, Mr. Elton Ismaili, Ferdinand Aligjoni, Mr. Ilir Hysi, Mr. Artur Baku; - *Democratic Party:* Mr. Agron Kapllanaj, Mr. Gentjan Muca; Mr. Rezart Tusha; Mr. Zef Hila; - *Social Democratic Party:* Mr. Kleo Murataj, Mr. Tom Doshi, Mr. Serdar Hoxhaj; - *Socialist Party:* Mr. Artan Bitri; Mr. Halim Dauti; Mr. Leonard Beqiri; - *Democratic Conviction Party:* Mr. Arsen Belaj, Mr. Bahri Shabani; - *Hashtag Initiative Party:* Mr. Boris Shakaj, Mr. Napolon Laska; - *Movement for Change Party:* Mr. Dashamir Tahiri, Mr. Adrian Gjoka; - *New Movement Party:* Mr. Ilmi Kuka: *Independent candidates* Pal Shkambi and Boiken Abazi.

<sup>&</sup>lt;sup>347</sup> Mr. Zef Hila, candidate of the Democratic Party, the self-declaration form does not contain suspicious data on the judicial status. Mr. Serdar Hoxhaj, candidate of the Social Democratic Party, in the self-declaration form there are no suspicious data on the judicial status. Mr. Napolon Laska, candidate of the Hashtag Initiative Party, did not report suspicious data on the judicial status, although referring to the response of the General Directorate of Prisons it is found that he has consumed the criminal offense "Obstruction of the circulation of road transport vehicles".

<sup>&</sup>lt;sup>348</sup> Mr. Rezart Tusha, candidate of the Democratic Party in Durres Region.

<sup>&</sup>lt;sup>349</sup> Mr. Zef Hila, Mr. Artur Baku, Mr. Napolon Laska, Mr. Vullnet Gjoka and Mr. Boiken Abazi, Mr. Arsen Belaj, Mr. Ido Pashaj, Mr. Tom Doshi, Mr. Daniel Prroj and Mr. Ervis Beu.

<sup>&</sup>lt;sup>350</sup> Mr. Tom Doshi, The Social Democratic Party and Mr. Zef Hila, Democratic Party.

that must be completed, but that regardless of the result of the verification will not have an impact, given that the object and purpose of in-depth verification has been lost.

KRIIK recommends that the verification of candidates be a process that should be completed preferably before election day. Even if it turns out to be objectively impossible due to the time required in cases of verifications abroad, at least inter-institutional efforts and better interaction should be made to make possible the publication of verification results at least within the territory of Albania.

#### VII. ELECTION CAMPAIGN

## VII.1. Campaign environment

The election campaign was dominated by political party leaders, and it lacked rational debate based on concrete government programs and offers. Freedom of expression and gathering was observed throughout the campaign despite restrictions imposed on the protection of public health due to the Covid-19 pandemic.

The legal framework provides that the election campaign, the period in which election contestants must act according to the rules set by the Electoral Code<sup>351</sup>, begins 30 days before the election date. Failure of having a clear definition of the campaign in the law, gives the election contestants the opportunity not to observe the legal provision and start the campaign earlier.<sup>352</sup>.

Political parties participating in the elections presented the political programs and held electoral meetings with citizens a few months before the official start of the campaign<sup>353</sup>. The gatherings for officially opening the campaign were also held one day before the date provided by the Electoral Code<sup>354</sup>. The activities of political parties during the period of the early election campaign were covered broadly by the media.

The restrictions imposed by the Ministry of Health according to the Order banning gatherings of more than ten people<sup>355</sup> were not observed both during the activities of the early election campaign, as well as the organization of the opening and closing activities in the official campaign.

The Socialist Party focused on *online* meetings throughout the early campaign. The meetings with citizens or interest groups were held on digital platforms. The SP changed strategy throughout the campaign, by conducting meetings that in principle maintained physical distance to be protected from COVID-19, but that violated the order to ban gatherings. Before the election campaign and throughout the official campaign, the Democratic Party and other opposition parties focused both on door-to-door meeting with citizens door to door and in mass gatherings in city squares.

In addition to the fact that organization of gatherings did not observe the instructions specified in the Order of the Ministry of Health, they became one of the debate subjects between the majority and the opposition.

<sup>&</sup>lt;sup>351</sup> The Electoral Code of the Republic of Albania, Article 77, "Campaign and electoral silence period".

<sup>352</sup> The Electoral Code of the Republic of Albania, Article2 "Definitions".

<sup>&</sup>lt;sup>353</sup> The Democratic Party announced the economic program on January 28, 2021. The Socialist Movement for Integration announced the economic program on January 25, 2021. The Socialist Party announced its program for justice "Justice we want" on March 3, 2021.

<sup>&</sup>lt;sup>354</sup> The SP and the DP officially launched the campaign in Tirana in the two main squares on March 25, a day before the March 26 date provided by the Electoral Code.

<sup>&</sup>lt;sup>355</sup> Order of the Ministry of Health and Social Protection No. 633 dated 17.11.2020, "On the prohibition of gatherings in open or closed places".

Despite the political rhetoric, this issue highlighted an even more important concern, such as the spirit of impunity, or selective punishment for the same violation.

The media reported that representatives of several political parties were fined during the election campaign by the State Police for violating restrictions against the spread of COVID-19<sup>356</sup>.

The relevant state authorities did not take a stand throughout the official campaign regarding the violations of the major parties. Meanwhile, two independent candidates were treated entirely differently and were fined for not observing the Order of the Ministry on gatherings<sup>357</sup>, violating the principle of equality in the electoral race for candidates.

Another concern remains the fact that Prime Minister Rama promoted through public statements the principle of impunity and bias<sup>358</sup>. The head of government emphasized the spirit of impunity and violation of anti-covid rules following the decision of the Ministry of Health, under which all Albanian citizens that entered Albania from the neighboring countries such as Greece and Northern Macedonia, had to be quarantined for 14-days. As a result, they were deprived of their right to vote<sup>359</sup>.

The pandemic management was a real issue and was given a broad space in the political rhetoric, particularly before the start of the official campaign, but also during it.

The vaccination campaign against Covid-19 was widely used by the socialist majority to gain credit during the campaign. There were also spots or posters on social networks appealing, under the Socialist Party logo and colors, to the population to get vaccinated. Even though the relevant institutions are in charge of this campaign, senior figures of the Socialist Party considered its management entirely as a merit of the government and Prime Minister Rama.

<sup>&</sup>lt;sup>356</sup> Some of the notifications of the State Police on the fines imposed for violating the Normative Act No. 3, dated 15.03.2020, point 2, article 3, as well as point 1 of Order No. 633, dated 17.11.2020 of MHSPS "On the prohibition of gatherings in closed or open places".

Notification of the State Police dated 12.02.2021, on fining the political representatives of the Democratic Party, Agim Cani and Fatmir Muça.

Notification of the State Police dated 12.02.2021 on fining the political representative of the SMI, Endrit Brahimllari. Notification of the State Police dated 12.02.2021 on fining the political representative of the SP, Blendi Klosi.

Notification of the State Police dated 12.02.2021 on fining the political representative of the DP, Edmond Spaho.

<sup>&</sup>lt;sup>357</sup> On April 12, 2021, the Commission for the Review of Administrative Offences decided to punish Iljaz Shehu, the candidate of Self Determination Movement in this district with a fine of ALL 5 million for violating the order of the Ministry to gather more than 10 people in open spaces.

On 26.03.2021 the Commission for the Review of Administrative Offences decided to punish Elton Debreshin, the independent candidate in Dibër district with a fine of ALL 5 million for violating the order of the Ministry to gather more than 10 people in open spaces.

<sup>&</sup>lt;sup>358</sup> Prime Minister Rama, during an interview on Opinion program at TV Klan, on April 25, 2021, commented on the activity of opening the DP campaign: "I do not know what the police will do in this case, as I have not said to them to impose fines or not... However, I hope that the police do nothing, as they are very professional at pretending to be the victim. Then the police have to be faced with all the mud thrown at them by the night media clubs".

<sup>&</sup>lt;sup>359</sup> Prime Minister Rama, during an interview on <u>Real Story</u> program on April 21, 1 2021, was declared about the citizens coming from these two countries and their right to vote, suggesting the violation of the decision: "Everyone who really wants it and comes as a patriot, since SMI has declared it, comes and votes ... So, the theory that we were quarantined, and the quarantine was imposed on us is nonsense".

To emphasize the importance of this process under his government, the Socialist Leader, at the same time Prime Minister of the country, addressed to the population intimidating statements in the media, stating that the vaccines provision and the continuation of this process was directly related to the continuation of the ruling mandate of the Socialist Party<sup>360</sup>.

Such approaches made in situations not simply related to the election campaign itself, but to the obligation of the Albanian state to protect the health of the population, as well as to provide insurance and security for the future life and health of citizens, are audacious and unacceptable.

In addition to the pandemic management, the political debate focused throughout the election campaign on economic issues, justice reform, foreign investment in the country, the mass exodus of young people from Albania, and the reconstruction process following the November 26, 2020 earthquake. The opposition considered these to be the biggest failures of the government, but there were no in-depth analysis and concrete plans to resolve these issues in their public discourse.

The election campaign was poor in terms of platforms, political party leaders were given central place, and individual candidates were left in the second place. Some of the campaign rhetoric discussed the individual characteristics of party leaders, and in some cases, it even escalated into personal denigrating campaigns.

The socialist government did not make available to its citizens the report of its eight years of government but presented the plans of investments to be made in the country in the next four years. <sup>361</sup>. This was called an action plan, continuation of works already underway, and did not publish a genuine electoral program <sup>362</sup>.

The Democratic Party published on its official website *shqipëriafiton.al*, the main pillars of its program<sup>363</sup>. The Socialist Movement for Integration party presented in its public appearances the party program, which on its official website, was named as "Electoral Priorities"<sup>364</sup>.

<sup>&</sup>lt;sup>360</sup> Edi Rama in a meeting with the inhabitants of Shkodra, March 31, 2021 "... If these people (DP) will come to power, what do you think, will the vaccination go on? Forget it! They do not know anything. Tell me about a health center? They do not know. All the incapable and indifferent people are gathered there. They know only to put up the two fingers and say "Rama go away..."

Edi Rama in a meeting with the inhabitants of Bylis, April 3, 2021 "... We ask for the third mandate, but we are not coming from our second mandate. We are coming from a mandate and a war that is not over yet. This war would have brought many to their knees, but not our government. One devastating earthquake and another shocking earthquake for the whole world..."

<sup>&</sup>lt;sup>362</sup> Edi Rama invited to the Open program on Top Channel, 2.04.2021 "... We do not have a program .... We have an action plan for 2021-2025 ... And it is clear, for example, we do not say that we will we reduce the tax because we have already made it nil. We only say that they will remain zero. The action plan is a program for all sectors".

<sup>&</sup>lt;sup>363</sup> On the website *shqipëriafiton.al*, the Democratic Party published the "<u>Program Albania Wins</u>", which presents the main pillars, the steps to be taken in various sectors of society for the economic and social development of the country, if this party is elected as the winning coalition in the general election.

<sup>&</sup>lt;sup>364</sup> The Socialist Movement for Integration has published on its official website in an electronic copy and through some illustrative videos its program called "Electoral Priorities 2021".

The programs of the parties Movement for Change, Democratic Conviction and Hashtag Initiative were published on their official websites<sup>365</sup>.

In the media there was no analysis of these programs by the parties themselves and experts of the relevant fields. The citizen was not exhaustively informed about the specifics of the programs or action plans. Therefore, on the voting day they were not fully informed about one of the main elements that shape the vote.

The right to a free vote is one of the fundamental rights stipulated in the Constitution of Albania<sup>366</sup>. As such, it is very important that the political climate and rhetoric used ensure that this process takes place without interference that can illegally or intimidatingly orient the citizen's vote.

Voter intimidation, in all its forms, was a serious issue, observed throughout the election campaign, particularly when they were inherent in the behavior or statements of the head of government.<sup>367</sup>.

The lack of programs and electoral analysis was replaced by meaningless debates with harsh language, which features were also observed before the official start of the campaign and were further intensified in the official campaign by using denigrating expressions against the opponent.<sup>368</sup>.

<sup>&</sup>lt;sup>365</sup> "Hashtag" Initiative: <u>33 Draft Laws – "Leave the Carpet"</u> Platform; Democratic Conviction: "<u>Our plan for a normal</u> Albania"; Movement for Change: Program.

<sup>&</sup>lt;sup>366</sup> Constitution of Albania: Political freedoms and rights, Article 45, point 1 and 4.

<sup>&</sup>lt;sup>367</sup>Prime Minister Rama expressed also the threats for an oriented vote, in his statement addressed to nurses and teachers, during a *live* communication on his official Facebook address. Prime Minister Edi Rama in a live communication with representatives of the Socialist Party, regarding employment in the administration declared on April 6, 2021 "Now teachers and nurses have been employed based on meritocracy, but they must defend their job because if the vote goes to an unspecified direction, they might be lost as well".

<sup>&</sup>lt;sup>368</sup> Edi Rama, 8.03.2021 Online meeting with the candidates of multi-name lists: "Dash Shehi, who has been giving to the right wing, the liberal spirit of rakia for 100 years... Agron Duka... Minister of Agriculture, since the agriculture rooster represents so many chickens, birds and eggs that the only henhouse that suits him well is Ministry of Food .... Idrizi, the Smoke of the customs, who has the TV set for his bloody war against the Greek, while using his position as a deputy to sell pigeon seats in the state offices..."

Edi Rama, the opening of the SP campaign, 25.03.2021: "... Luli is Saliu, Luli is Iliri, Monika. He is only a puppet. He is like those dolls that if you do not shake them, they sleep, when you shake them, they open their eyes, and sing a lullaby to put the babies to sleep..."

Mesila Doda, a Facebook post, 10.03.2021 "... The psychic stream flowed even today... oh, you pumpkin, the prime minister who has been in power for 8 years presents itself by reporting and not by cursing the women and men that he finds in front of him."

<sup>&</sup>lt;u>Petrit Vasili, statement for the media, March 10, 2021</u>: "Unfortunately, you are obliged, because your prime minister has no other job, except that of a jester. You are obliged to see and hear the endless bullshits of this prime minister, who abuses the chair and does not do his duty."

Erion Veliaj, in an interview in the media on 15.03.2021 stated "... Regarding the policy of Meta and Berisha "KCK", I want to tell Ilir Meta and anyone of this minority that 'your time is up, you have no chance, you will have to give up the public property'. We are willing to offer to violent men, alcoholics, free rehabilitation programs. Everyone should be given a second chance and we are ready to give them..."

The opposition has repeatedly accused the majority that it has been involved in electoral crimes such as theft or vote-buying, which they say would disrupt the election process<sup>369</sup>.

The President of the country Ilir Meta was also engaged in this debate, and he plaid a very active role during the election period in the country. His public appearances were accompanied by harsh language, turning himself into a party that cried out mainly personal accusations against Prime Minister Rama<sup>370</sup>.

Also, a special place on the official website of the institution of the Presidency was created where any citizen or entity could denounce violations observed in the electoral process. On the other hand, the President himself made several statements related to this issue in very harsh language<sup>371</sup>.

The attention that the media and civilians paid to such a language did not help the quiet climate that the election campaign was to take place.

Political parties, their leaders and also the institutions above the parties, failed to ensure that the citizens not be affected by the emotional decision-making resulting from the use of the harsh language. The insecure climate was accompanied on some occasions by physical attacks, or incidents in which representatives of a political force were involved.

KRIIK emphasized that at the beginning of the early election campaign, that the parties involved needed to keep themselves away from political tensions and harsh language, as this could lead to the escalation of electoral incidents.

The media reported during the election campaign incidents involving representatives of election contestants in several districts of the country<sup>372</sup>.

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<sup>&</sup>lt;sup>369</sup> SMI MP candidate Vangjel Tavo stated in a <u>public appearance</u> that in the Gjirokastër region, the ruling party was asking votes in exchange for money.

Alfred Rushaj, DP deputy candidate, on a Facebook post, 10.03.2021: "Out of desperation, Ervin Bushati, gives charity to the socialists in need, who should receive economic assistance from the administrative units and not from the SP offices."

Edi Rama, meeting with the inhabitants of Fier, on 4.04.2021 "... In fact, we should not have dealt with Luli at all because he is just a puppet, it is like Gjino who serves to make a wedding and has a new groom, while we know that the brave man who throws stones, is Iliri..."

President Ilir Meta in a statement to the media in Vlorë April 10, 2021 "... The incumbent Prime Minister has been issued a psychiatric card from the time of communism. I told this a few days ago and I will tell you in Vlorë, on 25 April in Vlorë, where the Albanians will make it known, he will show the card...".

<sup>&</sup>lt;sup>371</sup> President Ilir Meta, in a statement to the media, 23.10.2021 stated that he would take actions against anyone who would violate the free vote. He used harsh language, declaring "Whoever threats a vote, his hand will be cut off".

<sup>&</sup>lt;sup>372</sup> On April 18, 2021, the car of the chairman of the Democratic Party group in Shelqet, Vau i Dejës Municipality, Ariston Drini, was set on fire (Report by A2 CNN 18.04.2021).

On April 21, 2021, in Poliçan it was reported that an SMI member, Luan Tare Pitikoja, was hit with hard objects, claiming that the attack was political. (Reporting by A2 21.04.2021).

The event in Kavajë, where the DP secretary was injured in his electoral offices, was immediately declared that happened for political purposes. Statement of the State Police, April 20, 2021 "Today around 19:00, in the neighborhood no. 4, in Kavajë, it is suspected that due to a conflict for weak motives, the citizen N.J. entered inside an electoral office of a

The language of conflicts following these incidents would escalate further into an armed conflict which left one victim and several injured in Elbasan. This event marked negatively the election campaign, which was at its end, but also the post-election discussions.

The lack of will to calm down and the failure of election contestants to keep away from violent acts since the previous incidents in this city, and afterwards throughout the country, culminated with this event that was politically influenced and motivated.<sup>373</sup>.

The serious issues that this event brought to light were the attempts to buy votes, and its preservation also through the structures set up by the parties.<sup>374</sup>.

Involvement of political parties in such events does not contribute to a healthy electoral process, based on the local democratic and institutional principles, which inspire confidence. At the same time such events compromise and reduce the citizen's credibility towards institutions independent of politics,

political entity and wounded in the leg the citizen B.O., 27 years old, who was transported to Durrës hospital, and is now under the care of doctors".

The harsh reaction of the Democratic Party leader, Lulzim Basha, and his visit to the scene, gave this event political overtones, while the opposition leader considered this as an assassination attempt against the Democratic Party. Lulzim Basha in a statement to the media immediately after the event in Kavajë: "Tonight Kavajë was faced with a serious event, an assassination attempt against the DP, against the Alliance for Change by a prime minister who is aware of the fact that he lost on Sunday, Kavajë wins and Albania wins .... They want to intimidate the DP, they want to shut us up, we are not afraid. They will get the deserved answer by the citizens' vote on Sunday in Kavajë and throughout Albania".

Prime Minister Rama, through a post on social media condemned the act and appealed that this situation not to be attached to the politics. Edi Rama in a Twitter post "The injury of Kavajë is intolerable! The perpetrator should be arrested as soon as possible! The politicization of this event is as bad as the event itself! LB must join me to support the justice without causing tensions, while IM must stop the idiotic campaign of tension!"

<sup>373</sup> In Elbasan, a former official was killed. He was also involved in the previous incident that happened in this city before the start of the election campaign, on March 14, when DP and SP supporters physically attached each other- other during the official celebrations of Summer Day. The event, when there was a victim, happened on April 21, 2021, near the DP electoral offices and the groups involved were sympathizers of both political parties. The statement of the State Police dated 22 April 2021 for the murder of one person, in the city of Elbasan and the wounding of four others, due to the attacks between the representatives of the vote protection structures and the criminal representatives, which DP accuses as being related to the Socialist Party.

The political leader of the Democratic Party in Elbasan, Gazment Bardhi in a statement to the media April 21, 2021 "...The political conflict stimulated by the Socialist Party that causes tension at all times, in the attempt to maintain power at all costs, and to prevent citizens from voting freely .... What has happened today is the direct responsibility of Taulant Balla. He is responsible for engaging organized crime exponents in elections and inciting them to commit electoral crimes". Edi Rama in a post on *Twitter* on April 21 "The despair of the losers should not and will not make us lose either the peace, or the patience, or the belief that April 25 will unite Albanians to make Albania climb to the deserved peak and the meaningful punishment of the forces that want to turn snakes around our feet!

<sup>374</sup> The DP set up a body called the "vote protection structure", which consisted of supporters of this party, who had to identify and preserve the vote in cases of its theft or misappropriation. The deputy candidate of the Democratic Party Albana Vokshi, during a TV interview on A2news, 22.04.2021, stated: In the total absence of state institutions, the state to protect the vote, DP has established special structures composed of professionals, who are voluntarily working in an organized manner in the headquarters to obtain information, to provide and denounce what is called electoral crime. They are not armed. Those who have a legal permit can carry a weapon. I have no armed men in my headquarters. Mr. Bardhi said that the armed persons were granted a permit to carry it. They have been engaged in the Vote Protection Structures. They are doing what the state under Rama's orders is not doing ..."

such as the police and the prosecution's office, which failed to fulfill their legal constitutional mission to uncover and prevent the serious events.

Although there were harsh threatening statements and rising tensions a few days before the election<sup>375</sup>, on election day, the political parties and their representatives appeared and kept quiet tones during the public statements.

#### VII.2. Publication of the database of Tirana citizens

Two weeks before the election day, on April 11, 2021, an exclusive article was published on the *lapsi.al* portal<sup>376</sup>, which claimed that this media had provided a database of Tirana voters from the offices of the Socialist Party. The database included personal data (personal identification number, birthday, telephone number, etc.) and sensitive data (such as the political preference). The publication of the database caused a broad debate in public opinion and put at the center of public discussion a well-known phenomenon mentioned for a long time, but never to this extent, that of political patronage by political parties and attempts to control and direct the vote of the citizens<sup>377</sup>.

Regardless of the public stance of the publishing portal, that this database was taken from the offices of the Socialist Party, its exponents had initially contradictory public positions on this fact, but later the term "patronageist" became part of its political rhetoric and speech jokes of the Prime Minister, publicly defending the patronageists and even treating them as an important part of the Socialist Party structures<sup>378</sup>. Moreover, in some public appearances, including interviews in foreign media, the Prime Minister tried to make relevant the fact that the Socialist Party processes personal data of citizens, claiming that the ID card number is not a personal data. The published database contained not only personal data, but also sensitive data, data that have a special protection such as freedom and constitutional rights, as well as comments which in addition to the preference of the vote went as far as racial affiliation of citizens, or their physical fitness and health status.

<sup>&</sup>lt;sup>375</sup> The political leader of the Democratic Party, also a candidate for MP in the Dibër district, Xhelal Mziu, during a meeting with citizens made threatening statements regarding the attempts to buy votes from political opponents. "We have set up special groups from today onwards and if you see any suspicious person who moves in your neighborhoods, you can make just one phone call and he will suffer the same as the person in Elbasan".

The candidate for deputy apologized for his statements, while the Dibër District Police initiated a criminal proceeding for the criminal offense "Calls for armament or unfair taking of command" (Notification of the State Police on April 23, 2021).

<sup>&</sup>lt;sup>376</sup> Exclusive, lapsi.al: "How does Rilindja monitors the phone number, ID number, jobs, confidential data for 910 thousand voters of Tirana".

<sup>&</sup>lt;sup>377</sup> According to <u>lapsi.al.</u> this database, which contains both the data of the citizens of Tirana and of all Albania, the source of which was kept secret, was managed by the so-called "patronageists" in the Socialist Party, persons who were in charge to survey the political preferences of the citizens of Tirana? Patronageists possessed also personal information on citizens, which was used to intimidate citizens in order to orientate their vote.

<sup>&</sup>lt;sup>378</sup> Edi Rama in a meeting with young people in Tirana on April 18, 2021: "Let them say what they want because that is their job. Patronage is the first class of the great political school. The people who are ambitious to go high should start from patronage. My message to those who deal with patronage, starting with Ilir Meta, where is the camera? You can do nothing to patronageists! Remember: patronageists know who you are, do not think that you can hide your thoughts to our patronageists. "We know who you are and on April 25 you will see how well we know you."

The Socialist Party was widely accused in the media or even on social media by citizens, that it had received this data from the digital platform e-Albania, which is managed by the National Agency for Information Society (NAIS). There were also claims that the database contained recently updated data from citizens in e-Albania, which were not registered, according to them, anywhere else.

But NAIS performs the legal processing of personal data observing and guaranteeing the fundamental human rights and freedoms and, in particular, the right to privacy and protection of this data by law<sup>379</sup>, and through a public statement it denied allegations that the data had leaked from the e-Albania digital platform.<sup>380</sup>.

The Commissioner for the Right to Information and Personal Data Protection (KDIMDP) launched an administrative investigation into the illegal disclosure of personal data of citizens, which subject was *lapsi.al* portal, the General Directorate of Civil Status, the General Directorate of Taxation, the National Agency for the Information Society and the Socialist Party.

At the end of the investigation<sup>381</sup> the Commissioner concluded that it was impossible to establish a connection between the investigated controllers (except Lapsi.al) and the published database.

KRIIK notices that, in addition to the shortcomings and the lack of proper analysis throughout the administrative investigation process conducted, the findings of this investigation were alarming. This is in terms of the lack of understanding of the legislation and its obligations towards the employees of the institutions, the security level and the systems possessed and set up to store and secure personal data in state institutions, as well as related to incorrect practices used by the Socialist Party to collect and process citizens' personal data.

Regarding the institutions and entities involved in this investigation, the Commissioner had a recommendation<sup>382</sup> for the Socialist Party, DPGJC and NAIS. It did not conduct verifications for Lapsi.al portal because this subject is under investigation by SPAK; as well as, imposed<sup>383</sup> an administrative sanction on the General Directorate of Taxes.

<sup>&</sup>lt;sup>379</sup> Constitution of the Republic of Albania, Law No. 9887 dated 10.03.2008 'On the Protection of Personal Data' and Law no. 9918 dated 19.05.2008 'On Electronic and Postal Communications', as well as other bylaws.

<sup>&</sup>lt;sup>380</sup> Statement of the Director of the National Agency for Information Society (NAIS), Linda Karçanaj, dated 20.04.2021: "The data of Albanian citizens who receive *online* services through the unique government portal e-Albania are not stored and have never been stored, nor by NAIS nor from e-Albania. Unless otherwise prohibited by the legislation in force, there is no technical possibility for this data to be used and misused, when it cannot even be stored."

<sup>&</sup>lt;sup>381</sup>Administrative investigation report on illegal disclosure of personal data of citizens, Commissioner for the right to information and protection of personal data, Nr. 1399 prot., Dated 19.08.2021.

<sup>&</sup>lt;sup>382</sup> <u>Recommendation no. 42, dated 19.08.2021</u>, General Directorate for Personal Data Protection, For the controller "General Directorate of Civil Status".

<sup>&</sup>lt;u>Recommendation no 43, dated 19.08.2021</u>, General Directorate for Personal Data Protection, For the controller "National Agency of Information Society".

<sup>&</sup>lt;u>Recommendation no. 44, dated 19.08.2021</u>, General Directorate for Personal Data Protection, For the controller "Socialist Party of Albania".

Decision no. 41, dated 23.08.2021, General Directorate for Personal Data Protection, For the controller "General Directorate of Taxes".

The administrative investigation conducted by the Commissioner, was also conducted in view of the 78 complaints<sup>384</sup> that were files to this institution, mainly citizens, concerned about the publication of personal data in the same database.

Apart from the political debates that used this issue for electoral purposes, what is a major concern is the fact that no institutional actions were taken by state institutions to stop further violation and to provide protection for the citizens' data.

The only, multiple and continuous attempts, which were made public, were the statements of senior officials and elected officials of the socialist party, part or leaders of key state institutions. These statements were not at all official, but were characterized by a purely political nature, that constantly tried to make relevant the law, the severity of the situation, as well as to openly defend the patronagers and the patronage system, severely insulting and breaking the trust of Albanian citizens in state institutions and public officials in relation to the protection of rights and their constitutional freedoms.

### VII.3. Use of state resources for electoral gain

The use of public resources for electoral gain has been and continues to be a concern in the elections in Albania. The electoral advantage that the ruling party/parties have at a given moment can be extreme. The ruling party and the state institution are no longer distinguished, blurring the dividing line between the party and the state and causing a significant disadvantage for the opposition during the election process.

Some of the most important changes to the Electoral Code in July 2020 aim to limit the use of public resources for electoral gain. This was agreed upon by both the majority and the opposition in the June 5 Agreement. The changes were reflected in Articles 91 and 92 of the Electoral Code. Addressing the misuse of public resources and, in particular, those of the administration for electoral gain take on special significance in the light of the aspiration for a totally non-political election administration.

This amendment included a new regulation regarding the use of public institutions for electoral effect. More specifically, the changes addressed the departure of public institutional activity<sup>385</sup> and executive decision-making with an electoral function. These legal changes were not part of a public consultation, as the entire electoral reform process, but had the agreement of the political actors represented in the Political Council.

The July legal amendments provide for the prohibition of certain types of public activities of institutions in the four-month period preceding Election Day, which may have an electoral function. Also, for the four-month period preceding the elections, the new regulation prohibits actions such as "proposing, approving or issuing laws or bylaws, which provide for the provision of benefits to certain

<sup>&</sup>lt;sup>384</sup> Complaints to "Lapsi.al" were filed with IDPC; 4 complaints to the GDCS; 31 complaints to NAIS; 1 complaint for GDT; and 40 complaints to the SP.

<sup>385</sup> Electoral Code of the Republic of Albania, Article 92, "Activities of public institutions in the campaign".

categories of the population"<sup>386</sup>. It is observed that the provision of the Electoral Code fails to meet the legislative technique, thus leading to unnecessary impressions on the functioning of the administration. Although the provision makes a general and vague definition initially, it also lists the prohibited activities and closes with the phrase "other".

In this legal context, the Central Election Commission approved the decision on reporting and monitoring the public activity of institutions in the election period<sup>387</sup>. This decision, among other things, in its essence determined the regulation of the reporting of institutions for public activities in the four-month period preceding the elections. It also listed in a partially exhaustive category the "prohibited activities for promotion" and "prohibited activities".

The act adopted by the Regulatory Commission was sent for prior consultation not only to the political parties, but also to civil society organizations. CRICI<sup>388</sup> sent to CEC its opinion and suggestions related to the draft act. In addition to the technical elements, it stressed the paramount importance that this document should address a problematic phenomenon which is at the same time of great concern for democracy in Albania. It also highlighted that it is of importance for the Central Election Commission to handle properly and have a pro-active interaction with other institutions.

The political parties were consulted, and they agreed in advance about this act, which the Regulatory Commission adopted by consensus.

Despite the aspiration that such a legal act would regulate a persistent problem of elections in Albania, its implementation in practice was inefficient. During the electoral campaign, in the official period and, in particular in the non-official one, the highest political representatives of the state institutions merged all the institutional activity with the electoral campaign.

The State Election Commissioner did not adopt a proactive approach sanctioning the state officials, especially after the CAS decision that repealed the sanctions against the Mayor of Tirana.

Another crucial link of this legal regulation- the reporting the institutions make using the CEC interface - became a mechanical and bureaucratic process, without any control to their form or content.

In addition, the phenomenon of public administration actively participating in election campaign was also noted also in this election. There was noted an even increased participation of public administration staff in many cases, despite the use of intimidation mechanisms.

<sup>&</sup>lt;sup>386</sup> Electoral Code of the Republic of Albania, as amended, <u>Law no. 10019</u>, <u>dated 28.12.2008</u>, <u>Article 91</u>, Prohibition of the use of public resources in support of election contestants.

<sup>&</sup>lt;sup>387</sup> Decision no. 9, dated 24.12.2020, Regulatory Commission, "On the rules for reporting public activities of public institutions, agencies and / or state enterprises, categories of prohibited activities, as well as monitoring the activity, behavior and use of human resources, financial and logistical aspects of the state administration before the elections".

<sup>&</sup>lt;sup>388</sup> CRICI, Opinion, December 2020: Draft decision "On rules for reporting public activities of public institutions, agencies and/or state enterprises, categories of prohibited activities, as well as monitoring the activity, conduct and use of human, financial and logistical resources of state administration before the elections".

## VII.3.1. Conduct of institutions and public administration

To oversee the conduct of the state administration in the election processes, based on the practice of previous elections, a *task force* was set up under the supervision of the Deputy Prime Minister. This *ad hoc* mechanism achieved the control of public administration conduct during the election processes.

During the elections of 25 April 2021, this mechanism was modified due to the legal amendments of July 2020 to the Election Code, which were also reflected in the subsequent decision of the Regulatory Commission.

According to the Law on Civil Servant<sup>389</sup> and the Election Code<sup>390</sup>, public administration officials, at the central or local level, are prohibited from participating in electoral activities during the official working hours, and, in case of participating outside their working hours, should not perform actions that manifest openly the support for any political party. In addition to the participating in person, following the interpretation of the Commissioner for Civil Service Oversight (CCSO), this restriction is extended also to the fact that public servants cannot express publicly any political preference or belief in social networks <sup>391</sup>.

At the electoral meetings held by political parties and candidates for MP, was noted a significant presence of high public administration officials, who were accompanied also by high local officials<sup>392</sup>.

In addition to the fact that they attend these electoral activities during their official working hours<sup>393</sup>, a part of them were engaged in events as speakers and protagonists, which constitutes per se a violation of the election legal framework<sup>394</sup> or even the status of public servant.

The staff of local public administration presented before CRCI observers some claims that they had suffered pressure to engage in the campaign, in the form of active participation or even to provide voters for the ruling political party. Such allegations included also blackmails or intimidation for dismissal or interruption of social services benefits.

<sup>&</sup>lt;sup>389</sup> <u>Law No. 152/2013</u> (as amended), the Parliament of the Republic of Albania, "On Civil Servant", Article 37 "Political Rights".

<sup>&</sup>lt;sup>390</sup> Election Code of the Republic of Albania, Article 91 "Prohibition of use of public resources in support of election contestants".

<sup>&</sup>lt;sup>391</sup> With letter No. 458, dated 05.04.2021, sent to the human resources monitoring groups of the institutions part of the civil service, the Commissioner for Civil Service Oversight interpreted these restrictions by extending their application also to social media. According to the Commissioner's definition: "... sharing or liking electoral materials of political parties on social media (*Facebook*, *Twitter*, *Instagram*) in personal accounts of civil servants constitutes a violation of the duty not to publicly express their political beliefs or preferences".

<sup>&</sup>lt;sup>392</sup> Senior local officials attending electoral meetings were observed in Kamëz Municipality, Tirana Municipality, Vau i Dejës Municipality, Fushë-Arrëz Municipality, Krujë Municipality, Durrës Municipality, Fier Municipality, Korçë Municipality, Elbasan Municipality, Kukës Municipality, Vora Municipality, Lushnjë Municipality, Vlorë Municipality, Kurbin Municipality, etc.

<sup>&</sup>lt;sup>393</sup> Senior local officials in Vora, Krujë, Tirana, Vlorë, Bulqizë Municipalities.

Decision no. 9 dated 24.12.2020, Regulatory Commission, "On rules for reporting the public activities of public institutions, agencies and/or state enterprises, categories of prohibited activities, as well as monitoring the activity, conduct and use of human, financial and logistical resources of state administration before the elections".

Additionally, a high level of public administration involvement was noted in social networks in the election campaign, by posting or re-posting publications of various candidates for MPs, ministers and Prime Minister.

#### VII.3.1.1. Commissioner for Civil Service Oversight

The Commissioner for Civil Service Oversight (CCSO) is an institution established by law. It has the power to oversee, ex-officio or at the request of the institutions, the law enforcement by all institutions that employ civil servants, referring to the provisions of the Law on Civil Servants<sup>395</sup>.

The monitoring of public administration during the election campaign started with the approval of <sup>396</sup> the Order of the Commissioner for Civil Service Oversight, which ordered the setting up of monitoring groups in public institutions to ensure the implementation of the Civil Servant Law and the normal work activities of the civil servants' troupe, without affecting the election process. This secondary legal act was supplemented by the internal instruction <sup>397</sup> and regulation <sup>398</sup> of the working group.

The CCSO filed before the Parliament a special Report on overseeing the civil service administration and monitoring civil servants conduct during the election campaign.

In this report, the Commissioner has found an overall responsible and correct conduct of civil servants and public institutions. However, he emphasizes that there were identified<sup>399</sup> specific cases of public servants acting contrary to the law, as well as appointments to positions that are part of the civil service without performing the required legal procedure<sup>400</sup>. We stress that the violations were found following the monitoring of only 200 institutions<sup>401</sup> and 12,896 civil servants, out of about 16,000 total civil servants in the entire civil service system.

<sup>&</sup>lt;sup>395</sup> <u>Law No. 152/2013 of the Parliament of the Republic of Albania, "On Civil Servant", as amended, Article 14 "Power of the Commissioner" and Article 15 "Supervision".</u>

<sup>&</sup>lt;sup>396</sup> Order No. 13, dated 11.02.2021, of the Commissioner for Civil Service Oversight, "On setting up a Working Group for monitoring the conduct of civil servants during the election process."

<sup>&</sup>lt;sup>397</sup> <u>Instruction</u> on the unification of law enforcement in terms of participation of civil servants in the institutions administering the electoral process and respecting their political rights.

<sup>&</sup>lt;sup>398</sup> <u>Internal Regulation of</u> the Monitoring Group concerning the supervision of conduct of the civil servant during the election campaign period for the parliamentary elections.

<sup>&</sup>lt;sup>399</sup> See Denunciations <u>Section</u> in CCSO interface.

<sup>&</sup>lt;sup>400</sup> CCSO has identified 14 appointments made contrary to the Civil Servant Law. One case in a subordinate institution of the Ministry of Education, Sports and Youth and 13 cases in local self-government bodies, namely in the Municipalities of Kurbin, Devoll, Pogradec, Libohovë, Gjirokastër, Kukës, Fier, Divjakë, Mallakastër and Malësi e Madhe.

<sup>&</sup>lt;sup>401</sup> Prime Minister's Office, 11 ministries, 90 subordinate institutions, 12 prefectures, 12 District Councils, 61 municipalities and 13 independent institutions.

## VII.3.1.2. Running civil servants as candidates or engaging them in the election administration

With reference to Decision No. 9 of the Regulatory Commission, the public administration officials were 402 obliged to ask their suspension from public office in order to run as a candidate for MP in elections to the Albanian Parliament.

Based on the data of the Commissioner for Civil Service Oversight, 15 civil servants were registered as candidates for MPs and who were suspended from office.

In addition, to get engaged in election administration (as commissioners in CEAZ, BCC, BCG or as PEI operators), public servants are required to get an authorization from the direct superior.

According to the CCSO, 680 public administration officials were engaged in electoral administration.

#### VII.3.1.3. Denunciations via CCSO interface

For citizens to be able to denounce the cases of violations by public administration officials, the CCSO opened a page on its official website, 403 where civil servants could be denounced for involvement in political activities or for supporting an election contestant or candidate in elections.

According to the CCSO report, three complaints were filed through this web page<sup>404</sup>.

Based on the interpretation and opinion of CCSO, the intentional failure to understand the concept and phenomenon of non-use of state resources remains a concern.

In interpretation of CCSO that the employment of six additional persons in the Civil Aviation Authority is not considered a violation as it is a matter of increasing the staff of the institution, and this, according to CCSO, does not prejudice the rights of the those persons already employed by the institution, is not only contrary to the provisions of the Election Code and the CEC Decision No. 9, but it is also a dangerous misinterpretation, which leaves room for creating a negative precedents in the future that could leads to compromising and undoing the critical approach of the public towards such phenomena and cases.

<sup>&</sup>lt;sup>402</sup> Decision No. 9, dated 24.12.2020, Regulatory Commission, Article 6, "Rights and obligations of the state administration employee", paragraph 2.

<sup>403</sup> http://www.CCSO.al/?page\_id=3823&preview=true

<sup>&</sup>lt;sup>404</sup> The Monitoring Group in Cërrik Municipality has informed the CCSO that the civil servants in this municipality have acted in violation of Article 37 of the Law on Civil Servants.

The same violation was also found to have been done by an employee of the Fier-Vlorë-Gjirokastër Regional Environmental Agency. The Civil Aviation Authority started the restructuring process during the election campaign by employing six new civil servants. This was contrary to the Decision No. 9 of the Regulatory Commission, despite referring to Prime Minister's Order No. 359, dated 18.12.2020. Based on CCSO's interpretation, this is not considered a violation as it is a case that the number of staff has increased, and this does not affect the rights of those already employed by this institution. The CCSO find this case to be "lawful". A reasoning contrary to Decision No. 9 of the Regulatory Commission, Article 3, paragraph 1.3, letter d.

#### VII.3.2. Reporting the activities to the CEC

In addition to other elements, the Decision No. 9 of the Regulatory Commission provides for the mandatory reporting of activities by public institutions starting from four months before election day (25 December 2020). According to the provisions of this Decision, the public, central/local and subordinate institutions<sup>405</sup> had to report in the dedicated interface on the official website of the CEC the planned activities. The activities were published by the CEC in a dedicated page of their website<sup>406</sup>. Such reporting should be done, at least, five days in advance of the planned activity<sup>407</sup>.

The reporting process at this web page started on 27 December 2021. After monitoring the reporting on the CEC website, throughout the four months period before the election day, the activity reporting mechanism was not effective to achieve its goal. It did not even reflect the goa of setting up such mechanism at all. So, it turned into a formal bureaucratic procedure.

The problems noted in terms of reporting the activities vary from the lack of reporting, late reporting, or insufficient detailed reporting (in many cases the details were missing).

The total number of institutions, as identified in Decision No. 9 of the Regulatory Commission, which have the duty to report was 344 institutions. Only 51 out of the total had reported during the fourmonth period (in total 1,254 activities). The institution with the highest number of reported activities was the Prime Minister's Office with 431, followed by the Ministry of Finance and Economy with 152 and the Tirana Municipality with 94.

Although the regulatory framework required that activities are reported, at least five days in advance, about 72% of reported activities (906/1254) were reported less than five days in advance. A significant share (8%) was reported on the day on which the activity had taken place. Moreover, some were reported after the activity had taken place (39 activities).

The most important institutions with the highest level of activities are considered the Prime Minister's Office, the Ministries, Municipalities and Prefectures, i.e., a total of 89 institutions, and only 25 of them have reported.

Only 12 ministries out of 16, 11 municipalities out of 61, and only 1 out of 12 Prefectures have reported.

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<sup>&</sup>lt;sup>405</sup> The Prime Minister, his administration, the deputy prime minister, the minister and deputy minister, their administration, the mayor, his deputies and administration, the Prefect and his administration, the general director of agencies or institutions subordinated to the Prime Minister, the Council of Ministers or the Minister, the general director, the directors of departments, the directors of directorates and respective administrations, the heads and members of collegial bodies, entities, boards, any head of commercial companies under state administration, as well as in any entity where the state owns shares and capital/quota or appoints the majority of the supervisory or management body, the head and its deputies for the state enterprises (Article 3, paragraph 2 of Decision No. 9 of the Regulatory Commission.

<sup>406</sup> https://aktivitete.kqz.gov.al/category/aktivitetet-e-raportuara/.

Decision No. 9 dated 24.12.2020, of Regulatory Commission, Article 4, "Interface for reporting, reporting procedure and deadlines", paragraph 4.

A significant number of institutions- three ministries, 48 municipalities and 11 prefectures- have not reported any 408 activity via the CEC webpage, despite the monitoring revealed that they had performed such activities.

In addition, some of the institutions, despite having made their reporting, it<sup>409</sup> is a partial reporting, i.e., only some of the activities are reported.

Another issue of the reporting was that the notices, in many cases, did not observe the required form. According to the Decision of the Regulatory Commission, the notice should contain: the institution that organized the event, the date and time of the event, the topic of the event, the highest level of participation, the honorary guests, the planned speakers and how the event would be covered by media.

Out of all these elements, the media coverage of the activity is not mentioned in almost any of the reported activities. The venue of event was, for the most of activities, undefined (e.g., Tirana District, or simply Tirana), while speakers and participants were not specified in general.

CEC did not take any measure against any institution for non-reporting, reporting after the expiration of deadline, or for partial reporting, despite the regulatory framework recognizes this power of CEC.

The negligence of the public institutions in reporting, combined with the lack of sanctions, made the mechanism simply a formality, to lose its essence and the purpose for which it was established. This even questioned its eventual further application or it repealing.

#### VII.3.2.1. Denunciations

A total of 136 denunciations were sent to the CEC via the interface. A denunciation seems to be still under administrative investigation by the CEC, while the rest have been concluded by decision. In

<sup>&</sup>lt;sup>408</sup> The Ministry of Europe and Foreign Affairs, the Ministry of State for Diaspora and the Ministry of State for Entrepreneurship, although they have performed a series of activities from 25 December to 24 April, they have not reported any of them to the CEC interface.

the Municipalities of Belsh, Bulqizë, Cërrik, Delvinë, Devoll, Dibër, Dropull, Fier, Finiq, Fushë-Arrëz, Gjirokastër, Gramsh, Has, Himarë, Kamëz, Kolonjë, Konispol, Korçë, Krujë, Kukës, Lezhë, Libohovë, Librazhd, Maliq, Lushnjë, Malësi e Madhe, Mallakastër, Mat, Memaliaj, Mirditë, Patos, Peqin, Pogradec, Poliçan, Përrenjas, Pukë, Pustec, Rrogozhinë, Sarandë, Selenicë, Shijak, Skrapar, Tepelenë, Tropojë, Vau i Dejës and Vlorë have not reported any of their public activities to the CEC interface.

As for the prefectures, only Elbasan Prefecture has reported.

<sup>&</sup>lt;sup>409</sup> Ministry of Defense, Ministry of Justice, Ministry of Agriculture and Rural Development, Ministry of Health and Social Protection, Ministry of Tourism and Environment, Ministry of State for Relations with Parliament, Ministry of State for Reconstruction. Përmet Municipality, Roskovec Municipality.

this regard, 104 decisions were taken by the Commissioner, nine of which were appealed before CAS. The latter overturned or amended the Commissioner's 410 decisions for six denunciations.

In 86 denunciation cases, the Commissioner decided not to initiate any administrative proceeding or to terminate the administrative review for there was no violation found. In 15 cases, it decided to order administrative sanctions<sup>411</sup>, while in 17, it declared lack of jurisdiction. Additionally, in 11 cases, the Commissioner ordered the institutions denounced to take immediate measures, and two cases were referred to other institutions for it was their jurisdiction. Three complaints were handled with in a letter from the Commissioner and no proper decision was taken.

Regarding the complainants, 70% of denunciations were filed from the institution of the President of the Republic and the political parties SMI and DP<sup>412</sup>.

According to the CCSO, the CEC handled ten complaints against public administration employees, where only three cases were civil servants. In these three cases, the Commissioner concluded<sup>413</sup> that Decision No. 9 of the Regulatory Commission was not violated.

To increase transparency, it is suggested that the denunciations submitted to the CEC by various stakeholders should be examined in public hearings and with the presence of the parties to the process.

<sup>410</sup> <u>Decision No. 06, dated 16.02.2021</u>, of Commission for Appeals and Sanctions, "On the review of appeal application No. 03, dated 11.02.2021, of Mr. Erion Veliaj against the decision of the State Election Commissioner No. 46, dated 09.02.201".

<u>Decision No. 04, dated 22.01.2020</u>, of Commission for Appeals and Sanctions, "On appeal application No. 1 of Mr. Arben Qalliu and No. 2 of the Socialist Movement for Integration Party against the decision of the State Election Commissioner No. 7, dated 14.01.2021".

<u>Decision No. 103, dated14.07.2021</u>, of Commission for Appeals and Sanctions, "On the review of appeal application No. 59, filed with the CEC on 12.07.2021".

<u>Decision No. 107</u>, dated 26.07.2021, of Commission for Appeals and Sanctions, "On the review of appeal application No. 60, filed with the CEC on 22.07.2021".

<u>Decision No. 108, dated 26.07.2021</u>, of Commission for Appeals and Sanctions, "On the review of appeal application No. 61, filed with the CEC on 22.07.2021".

Decision No. 113, dated 08.11.2021 "On the review of appeal application No. 74, filed with the CEC on 28.10.2021".

<sup>411</sup> <u>Decision No. 46, dated 09.02.2021</u>, of State Election Commissioner, <u>Decision No. 7, dated 14.01.2021</u>, of State Election Commissioner, <u>Decision No. 234, dated 14.04.2021</u>, of State Election Commissioner, <u>Decision No. 452, dated 21.09.2021</u>, of State Election Commissioner.

<sup>412</sup> In particular, 34 denunciations were made by SMI, 32 denunciations by DP, 28 denunciations by the institution of the President of the Republic, 15 denunciations by various whistleblowers who are individuals, 22 denunciations by non-profit organizations and one denunciation by the Democratic Obedience Party, Roskovec Municipality, the Assembly of the Socialist Party in Tropojë and Durrës Museum Center, respectively.

<sup>413</sup> <u>Decision No. 351, dated 05.05.2021</u> of the State Election Commissioner, on the administrative review of complaint for violation foreseen by Decision No. 9, dated 24.12.2020 of the Regulatory Commission of the Central Election Commission against Mr. Francesko Muçaj, Director of the Local Probation Service Office in Vlorë.

<u>Decision No. 350, dated 05.05.2021</u>, of the State Election Commissioner, on the administrative review of denunciation for violation of Decision No. 9, dated 24.12.2020 of the Regulatory Commission of the Central Election Commission against Mrs. Anjeza Shiko, Director of Vlorë Regional Tax Directorate.

<u>Decision No. 233, dated 14.04.2021</u>, of the State Election Commissioner, on the administrative review of denunciation for violation of Decision No. 9, dated 24.12.2020 of the Regulatory Commission of the Central Election Commission against Mrs. Donika Hysenaj.

## VII.3.3. Publication of contact details

The Decision No. 9 dated 24.12.2020 of the Regulatory Commission provides for the obligation to publish the official contact details of the heads<sup>414</sup> of central and local public institutions.

Following the monitoring of the official websites of all municipalities, prefectures and ministries and the Prime Minister's Office, this legal obligation seems to be partially met by the aforementioned institutions.

So, only eight municipalities<sup>415</sup> and two prefectures published the contacts details as required by law<sup>416</sup>.

## VII.3.4. Normative acts related to the use of state resources

In addition,<sup>417</sup> to activities categorized as prohibited, the Election Code, banned, four months before election day, also the proposal, adoption or issuance of primary or secondary legal acts providing for the granting of benefits to certain categories of population<sup>418</sup>. All public institutions are in charge of meeting this obligation.

Following the monitoring of the Council of Ministers and Municipal Councils' decisions, some secondary legislation result<sup>419</sup> to be adopted in violation of this provision of the Election Code and Decision No. 9 of the Regulatory Commission.

<sup>&</sup>lt;sup>414</sup> Regulatory Commission Decision no. 9 dated 24.12.2020, "Reporting rules of public character activities of any public institution, with state capital, agencies, state entities, categories of prohibited activities, and monitoring the activities, conduct and use of human, financial and logistical resources of state administration before the elections", Article 7, paragraph 1: "The Secretary Generals of central and local public institutions, either independent and subordinate, mayors, prefects, heads of administrative units and heads of subordinate institutions"; letter c "publish their contact data on the respective official website, in order to manage any case of involvement, calling for, ordering, blackmailing or requesting the involvement of the staff of that institution in political activities or to support an election contestant or a candidate in elections".

<sup>415</sup> Vau i Dejës Municipality, Tropojë Municipality, Shijak Municipality, Puka Municipality, Dropull Municipality, Konispol Municipality, Lezhë Municipality, Peqin Municipality.

<sup>&</sup>lt;sup>416</sup> Prefecture of Durrës District and Prefecture of Berat District.

<sup>&</sup>lt;sup>417</sup> Election Code, Article 91 "Prohibition of use of public resources in support of election contestants", paragraph 4.

<sup>&</sup>lt;sup>418</sup> In particular, it includes acts providing for the increase of salaries, pensions, economic aid or social support, tax reductions or omission, fiscal amnesties, privatization or granting assets or compensations, etc., unless the initiative is required by a natural disaster.

<sup>&</sup>lt;sup>419</sup> <u>Decision of the Council of Ministers No. 100, dated</u> 17.02.2021 "On the designation of the Ministry of Infrastructure and Energy as the contracting authority for a potential concession procedure/Public Private Partnership, for the Port of Triport, in Vlorë. By this DCM, the Council of Ministers has initiated a concession/ public private partnership and designating the Ministry of Infrastructure and Energy in charge thereof. This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 4.

<u>Decision No. 1076, dated 24.12.2020,</u> "On some amendments and insertions to the Council of Ministers Decision No. 555, dated 11.8.2011, "On approval of the structure and salary levels of highly educated workers and nurses in the system of the Ministry of Health and the military medical unit at Trauma University Hospital, and the treatment of medical personnel in the structures of the armed forces ", as amended. This decision is contrary to the provisions of Regulatory Commission <u>Decision No. 9</u>, Article 3, paragraph 3.

<u>Decision No. 1149</u>, dated 24.12.2020, on "Some amendments to Council of Ministers Decision No. 175, dated 8.3.2017, on" Salary and bonus remuneration of teaching staff and other non-teaching staff in pre-university education ", as amended. This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 3. <u>Decision No. 244</u> dated 23.04.2021 "On setting the amount of funding, in the 2021 budget, for religious communities that have signed agreements with the Council of Ministers".

<u>Decision No. 1151</u>, dated 24.12.2020 "On setting the number of temporary contracted employees for 2021 in the central government units"

<u>Berat Municipal Council Decision No. 21, dated 29.03.2021</u> "On approving the request of Berat Municipality together with the technical and legal documentation for providing financial assistance to families whose homes have been damaged by fire and earthquake of 2019 from the 2020 Municipality budget under "Civil Emergencies Program".

<u>Vlorë Municipal Council Decision No. 19, dated 25.02.2021</u> "On some amendments to Vlorë Municipal Council Decision No. 109, dated 18.10.2018 on approval and implementation of the low-cost housing program, through loans with relief terms from Vlorë Municipality Budget".

<u>Berat Municipal Council Decision No. 27, dated 16.04.2021</u> "On the use of social support funds, financial support to deal with the special cases for Mr. Panajot Myftari". This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 1.1, letter b.

Berat Municipal Council Decision No. 28, dated 16.04.2021 On the use of social support funds, financial support to deal with special cases". of Rakip Zhuri". This decision is contrary to the provisions of Regulatory Commission Decision no. 2, Article 3, paragraph 1.1, letter b.

<u>Cërrik Municipal Council Decision No. 13 dated 26.02.2021</u>, "On the allocation of salary increase fund to pre-school education for 2021". This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 3.

Shkodra Municipal Council Decision No. 17, dated 25.03.2021 "On a supplement to the Municipal Council Decision No. 63, dated 28.12.2020, "On the approval of the 2021 budget and the final medium-term budget program 2021-2023 for Shkodra Municipality." This decision is contrary to the provisions of Regulatory Commission Decision no. 9, Article 3, paragraph 3.

Skrapar Municipal Council Decision No. 17 dated 25.03.2021 "On an amendment to the Municipal Council Decision No. 68, dated 24.12.2020 "Approving the annual budget 2021 and the draft medium-term budget 2021-2023 for Skrapar Municipality and its subordinate institutions." This decision is contrary to the provisions of Regulatory Commission Decision no. 9, Article 3, paragraph 1.3, letter d.

Përmet Municipal Council Decision No. 13 dated 03.03.2021 "On a supplement to the Municipal Council Decision No. 99 dated 30.12.2020 "On the approval of the municipal budget for 2021". This decision is contrary to the provisions of Regulatory Commission Decision no. 9, Article 3, paragraph 3.

<u>Përmet Municipal Council Decision no. 17, dated 03.03.2021</u> "On the approval of the twice as high payment from the 6% fund for January 2021". This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 3.

Krujë Municipal Council Decision No. 110, dated 28.12.2021 "Forgiving administrative measures during the pandemic period". This decision is contrary to the provisions of Regulatory Commission Decision no. 9, Article 3, paragraph 3. Korçë Municipal Council Decision No. 31, dated 25.03.2021 "On the approval of the salary increase fund for the preschool education". This decision is contrary to the provisions of Regulatory Commission Decision No. 9, Article 3, paragraph 3.

Gjirokastër Municipal Council Decision No. 19, dated 05.03.2021 "On an increase in the budget 2021 as a result of the increase of salaries for the functioning of pre-school education". This decision is contrary to the provisions of Regulatory Commission Decision No. 9, Article 3, paragraph 3.

<u>Lezhë Municipal Council Decision No. 30, dated 24.02.02021 "On</u> an increase in the budget of Lezhë Municipality for 2021". This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 3.

# VII.3.5. Electoral Offices and propaganda materials

#### VII.3.5.1. Electoral Offices

Based on the country's experience in election campaigns, the duty of election contestants to register the electoral offices with the Local Government Units where their office is located, was introduced<sup>420</sup> for the first time in 2017. The legal definition of "electoral office" is laid down in an Instruction<sup>421</sup> of the State Election Commissioner sating that an "electoral office" is the premise/office utilized by the election contestants or their candidates during the election campaign. The Instruction also imposes<sup>422</sup> the obligation of contestants to notify the mayor of the territory where the electoral office will be opened, and the locations where their opening is not permitted.

The process of opening an electoral office implies, among other, the duty to make an official notice to the Municipality of the area where the office is planned to be opened.

Based on the communication of CRICI observers, in all the municipalities of the country, only three contestants<sup>423</sup>, out of ten who had opened electoral offices, notified only nine municipalities<sup>424</sup> the opening of their offices.

<u>Mallakastër Municipal Council Decision No. 14, dated 24.02.2021 "On</u> approving a twice as high economic assistance to families in need to be treated with economic assistance with the fund up to 6% from the municipal budget." This decision is contrary to the provisions of Regulatory Commission <u>Decision No. 9</u>, Article 3, paragraph 3.

<u>Tirana Municipal Council Decision No. 12</u>, dated 01.03.2021; "On providing rent subsidy to some families in need who cannot afford to pay the free market rent." This decision is contrary to the provisions of Regulatory Commission <u>Decision</u> no. 9, Article 3, paragraph 3.

<u>Tirana Municipal Council Decision No. 50</u>, dated 06.04.2021; "On creating fiscal facilities for business to cope with the impacts of Covid-19 infection." This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 3.

<u>Tirana Municipal Council Decision No. 56, dated 06.04.2021</u>; "On providing rent subsidy to some families in need who cannot afford to pay the free market rent". This decision is contrary to the provisions of Regulatory Commission <u>Decision</u> no. 9, Article 3, paragraph 3.

<u>Tirana Municipal Council Decision No. 57, dated 06.04.2021</u>; "On providing rent subsidy to some families in need who cannot afford to pay the free market rent". This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 3.

<u>Tirana Municipal Council Decision No. 68, dated 19.04.2021</u>; "On providing rent subsidy to some families in need who cannot afford to pay the free market rent". This decision is contrary to the provisions of Regulatory Commission <u>Decision no. 9</u>, Article 3, paragraph 3.

The Instruction no. 1, dated 31.05.2017 "On the use of propaganda materials and their posting places during the election campaign". Article 2, paragraph 3 provides "The election contestant has the duty to inform in writing, within five days from the entry into force of this Instruction, the respective Mayor about the exact addresses of the electoral offices".

<sup>421</sup> <u>Instruction no. 6, dated 23.03.2021</u>, of the State Election Commissioner "On the use of propaganda, education materials and their posting rules during the election campaign".

<sup>422</sup> Ibid, Article 5 " Electoral Offices", paragraph 2 "No later than 35 days before the election date, the election contestant informs in writing the respective Mayor and sends a copy to the CEC about the setting up of electoral offices and their exact addresses."

<sup>423</sup> The Socialist Party, the Democratic Party and the Socialist Movement for Integration Party.

<sup>424</sup> Delvinë Municipality, Dropull Municipality, Elbasan Municipality, Krujë Municipality, Libohovë Municipality, Mat Municipality, Kashar Municipality, Peqin Municipality and Përrenjas Municipality.

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The observers hired by CRICI, who were in charge of, among others, the monitoring of electoral offices, identified 676 electoral offices in 53 municipalities<sup>425</sup> and that these offices belonged to 16 election parties/contestants<sup>426</sup>.

The contestant noted to have the highest number of identified electoral offices was the Socialist Party, with 275, followed by the Democratic Party with 254 and the Socialist Movement for Integration with 81 offices.

## VII.3.5.2. Propaganda materials

The propaganda materials during the election campaign, under the Election Code<sup>427</sup>, can be displayed only in the places designated by decision of the head of the respective local government unit.

Referring to<sup>428</sup> the instruction of the State Election Commissioner, the mayors should take measures not to allow or to remove immediately any fixed material, including posters and flags from any location not designated by a decision of the mayor.

CRICI send an official request to 61 municipalities in the country. After this official communication, only two municipalities resulted not<sup>429</sup> to have taken a decision on the places where propaganda materials could be displayed during the election campaign. Four municipalities<sup>430</sup> have not given clear feedback whether they have or not taken such decision, thus avoiding giving this information. The other 55 municipalities <sup>431</sup> have taken a decision on the places where propaganda materials can be displayed during the election campaign.

<sup>&</sup>lt;sup>425</sup> Number of electoral offices by Municipality: Tirana, 135; Durrës, 60; Vlorë, 57; Fier, 55; Shkodër, 37; Korçë, 30; Lezhë, 24; Elbasan, 22; Lushnjë, 15; Sarandë, 14; Berat, 13; Patos, 13; Gjirokastër, 12; Shijak, 11; Bulqizë, 10; Kamëz, 10; Kavajë, 10; Krujë, 9; Kukës, 8; Roskovec, 8; Dibër, 7; Divjakë, 7; Kurbin, 7; Tepelenë, 7; Vorë, 7; Devoll, 6; Konispol, 6; Rrogozhinë, 6; Kolonjë, 5; Kuçovë, 5; Vau i Dejës, 5; Gramsh, 4; Librazhd, 4; Peqin, 4; Përmet, 4; Pogradec, 4; Selenicë, 4; Klos, 3; Mallakastër, 3; Poliçan, 3; Pukë, 3; Belsh, 2; Cërrik, 2; Mat, 2; Memaliaj, 2; Mirditë, 2; Skrapar, 2; Tropojë, 2; Finiq, 1; Has, 1; Himarë, 1; Këlcyrë, 1; Përrenjas, 1.

<sup>&</sup>lt;sup>426</sup> Number of electoral offices by election contestant: Socialist Party, 275; Democratic Party, 254; Socialist Movement for Integration, 81; Social-Democratic Party, 19; Justice, Integration and Unity Party, 16; New Movement Party, 8; Hashtag Initiative, 5; Democratic Obedience, 5; Independent Candidate, 2; Agrarian Environmentalist Party, 2; New Democracy Alliance, 2; New Democratic Spirit, 2; Movement for Change, 2; Democratic Party of Albania, 1; Christian Democratic Party, 1; Republican Party, 1.

<sup>&</sup>lt;sup>427</sup> Election Code of the Republic of Albania, Article 79 "Display of propaganda materials".

<sup>&</sup>lt;sup>428</sup> Instruction No. 6 dated 23.03.2021 "On the use of propaganda, education materials and their posting rules during the election campaign", Article 3.

<sup>&</sup>lt;sup>429</sup> Maliq Municipality and Fushë-Arrëz Municipality.

<sup>&</sup>lt;sup>430</sup> Gjirokastër Municipality, Kamëz Municipality, Kuçovë Municipality, Skrapar Municipality.

<sup>&</sup>lt;sup>431</sup> Municipalities of Belsh, Berat, Cërrik, Dibër, Bulqizë, Elbasan, Devoll, Malësi E Madhe, Mallakastër, Memaliaj, Përmet, Divjakë, Dropull, Fier, Pukë, Pustec, Gramsh, Has, Selenicë, Shijak, Himarë, Klos, Kolonjë, Vorë, Korçë, Delvinë, Kurbin, Lushnjë, Durrës, Pogradec, Finiq, Poliçan, Përrenjas, Roskovec, Kavajë, Këlcyrë, Rrogozhinë, Sarandë, Konispol, Krujë, Kukës, Shkodra, Lezhë, Libohovë, Librazhd, Tropojë, Mat, Mirditë, Patos, Peqin, Ura Vajgurore, Tepelenë, Vau–Dejës, Vlorë, Tirana.

Although the municipalities have fulfilled the obligation of the Election Code, this duty resulted to have been met partially. Namely 15 municipalities<sup>432</sup> did not publish this decision on their official website, whereas seven decisions<sup>433</sup> do not comply with the legal deadlines set by the Electoral Code.

Despite the aforementioned legal prohibitions, the posting of propaganda materials was noted in some municipalities<sup>434</sup>, which were removed after the intervention of the State Election Commissioner.

<sup>432</sup> Tepelenë Municipality, Delvinë Municipality, Këlcyrë Municipality, Mallakastër Municipality, Mat Municipality, Pustec Municipality, Kurbin Municipality, Peqin Municipality, Fushë-Arrëz Municipality, Maliq Municipality, Skrapar Municipality, Gjirokastër Municipality, Kamëz Municipality, Kuçovë Municipality, Tirana Municipality.

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<sup>&</sup>lt;sup>433</sup> Berat Municipality, Bulqizë Municipality, Himarë Municipality, Përrenjas Municipality, Rrogozhinë Municipality, Shkodra Municipality, Vlorë Municipality.

<sup>&</sup>lt;sup>434</sup> Gjirokastër Municipality, Durrës Municipality, Librazhd Municipality, Elbasan Municipality, Kamëz Municipality.

#### VIII. FINANCING OF ELECTION CAMPAIGN

# VIII.1. Legal Framework

The financing of political parties and electoral subjects is regulated by the Constitution of the Republic of Albania<sup>435</sup>, Law "On political parties<sup>436</sup>", Electoral Code\<sup>437</sup>, acts of the Central Election Commission, as well as by the fiscal legislation in force<sup>438</sup>. Legislation governing the financing of parties and electoral subjects has been subject to constant change. The legal regulation on the financial activity of political parties and electoral subjects has been drafted according to various legislative processes spread over time, in the absence of an initial vision of the entire relevant legal-institutional mechanism. For this reason, this legal framework in its entirety is fragmented and substantially non-integral. Substantial changes were made in 2017, in the Law on Political Parties<sup>439</sup> and in 2020, in the Electoral Code<sup>440</sup>.

The July 2020 amendments to the Electoral Code<sup>441</sup> also include amendments to 19 provisions addressing the regulation of the financial activity of electoral subjects<sup>442</sup>. The amendments address controller rights, bans and penalties, as well as aim to increase the financial transparency of electoral subjects.

The main novelties brought by these amendments are considered to be:

- Monitoring of electoral activities of electoral subjects is partially performed;<sup>443</sup>;
- Electoral subjects are required to maintain complete financial documentation for a specified period of time<sup>444</sup>;
- Clear assertion that third parties are allowed to denounce facts about illegal actions committed by electoral subjects<sup>445</sup>;
- Aggravation of penalties for electoral subjects in case of non-cooperation with the accounting audit appointed by the CEC;
- Reducing the maximum spending limit of electoral subjects;<sup>446</sup>;

<sup>435</sup> Constitution of the Republic of Albania.

Law no. 8580, dated 17.2.2000, "On political parties", amended.

<sup>437</sup> Electoral Code of the Republic of Albania.

<sup>438</sup> Law no. 92/2014, "On value added tax in the Republic of Albania".

Law no. No. 90/2017 "On some changes and additions to law no. 8580, dated 17.2.2000, "On political parties", amended ".

<sup>440</sup> Law no. 101/2020 "On some changes and additions to law no. 10 019, Date 29.12.2008, "Electoral Code of the Republic of Albania", amended

<sup>&</sup>lt;sup>441</sup> Some of these amendments were not new in the legislation, as they were included in 2017 in the Law "On Political Parties" and were included in the Electoral Code in 2020. The Law on Political Parties was amended in November 2020, eliminating the articles regulating the activity of electoral subjects, some of which were already included in the Electoral Code.

<sup>&</sup>lt;sup>442</sup> Articles 3, 20, 78, 86, 87, 88, 89, 90, 91, 92, 92/1, 92/1, 92/3, 92/4, 92/5, 92/6, 92/7, 173, 180.

<sup>&</sup>lt;sup>443</sup> Electoral Code of the Republic of Albania, Article 92/4, "Monitoring of the election campaign".

<sup>&</sup>lt;sup>444</sup> Electoral Code of the Republic of Albania, Article 92/3, "Declaration and publication".

<sup>&</sup>lt;sup>445</sup> Electoral Code of the Republic of Albania, Article 123/3, "Public participation in denouncing the facts".

<sup>&</sup>lt;sup>446</sup> Electoral Code of the Republic of Albania, Article 173, "Sanctions related to campaign financing".

- Involvement in reporting and control of the financial activity of electoral subjects and candidates of multi-name lists;
- Obligation of candidates in multi-name lists for opening bank accounts for receiving donations over 50 thousand ALL;<sup>447</sup>;
- Lowering the threshold for donations to be made through the bank account;<sup>448</sup>;

Although, in general, these amendments are considered to be positive, they fail to address important issues, while not bringing new transparency mechanisms, in whole or in part, during the election campaign.

Some of the major issues related to the financing of political parties and electoral subjects, which remain to be addressed in the legislation, are considered to be:

- Allowing financial activity and activities carried out by third parties in favor of electoral subjects or the so-called *shadow campaign*;
- Expenditures for electoral purposes incurred before or after the election period continue to have a different control regime;
- The declaration of expenses of electoral subjects during the election campaign is not required;
- Lack of control and verification of quotas collected by electoral subjects;
- Lack of interaction of the CEC with the tax authorities for the control of the financial activity of the electoral subjects

## **VIII.2. Incomes and Expenditures**

# VIII.2.1. Incomes

The legal framework defines as legitimate sources of financing for the election campaign the funds provided in advance from the State Budget for political parties registered as electoral subjects; income of the electoral subject itself; gifts for the electoral subject and its candidates, in monetary value, in kind or services, as well as loans or credits received from political parties or candidates.

The total amount of revenues for the 32 electoral subjects that ran in the 2021 elections (27 parties and 5 independent candidates) including the respective candidates is 291,457,174 ALL, of which

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<sup>&</sup>lt;sup>447</sup> Electoral Code of the Republic of Albania, Article 92/2, "Registration of non-public funds" point 2, amended.

<sup>&</sup>lt;sup>448</sup> Electoral Code of the Republic of Albania, Article 92/2, "Registration of non-public funds", point 3.

about 43% (125,816,694 ALL) are from the state budget, ie. public funding<sup>449</sup> and 57% (165,640,480 ALL) are private financing.<sup>450</sup>.

The Socialist Party received the largest share of the incomes, more than all other electoral entities combined, followed by the Democratic Party and the Socialist Movement for Integration.<sup>451</sup>.

### VIII.2.1.1 State Budget Funds

The July 2020 amendments to the Electoral Code changed the way public funds are distributed to electoral subjects, both in terms of how funds are allocated, but also in terms of the support that an electoral subject should enjoy in order to receive public funds.

According to the system applied in previous elections, all parties that registered to participate in the election received public advance funding, regardless of whether they had participated in the previous election or not<sup>452</sup>. Meanwhile, according to the current system, electoral subjects that have received over 1% of the nationwide votes in the previous elections of the same type receive advance funds, in proportion to the number of votes received in those elections.

This way of distributing funds discriminates and reduces the space for new alternatives in the spectrum of political parties, as political parties that have not participated in previous elections of the same type can not benefit from public funding, although, potentially, may have public support.

The second change concerns the increase of the voting threshold that an electoral subject must receive in order to receive public funds, from 0.5% to 1%, de facto unifying the electoral threshold with the threshold for receiving funds.

This change is also considered to be restrictive, as it reduces the opportunity to benefit funds for small parties and favors large parties. At least two political parties participating in the 2021 elections would have benefited from public funding for the campaign<sup>453</sup> if the threshold was 0.5%.

<sup>&</sup>lt;sup>449</sup> In the 2019 Local Elections, public funding accounted for about 60% of total campaign revenues; in the 2017 Parliamentary Elections public funding accounted for about 85% of total campaign revenues; in the 2015 Local Elections public funding accounted for 23% of total campaign revenues and in the 2013 Parliamentary Elections public funding accounted for about 43% of total campaign revenues.

<sup>&</sup>lt;sup>450</sup> From the total amount of income from private funding, it results that: 4,124,978 ALL are cash donations to electoral subjects; 7,861,950 ALL are donations to electoral subjects in kind; 37,922,713 ALL are income from membership fees of electoral subjects; 65,537,732 ALL are incomes generated by the electoral subjects themselves and 50,193,107 ALL are incomes declared by the candidates of multi-name lists.

<sup>&</sup>lt;sup>451</sup> SP has 61% of total incomes, DP 16.5%, SMI 15% and 17.5% is the share of total incomes received and spent by other electoral subjects.

<sup>&</sup>lt;sup>452</sup> The preliminary fund was recalculated at the end of the election, based on the votes received from each political party, and the party could receive additional funding, or partially or fully repay the funds received in advance. The recalculation was made after the announcement of the final election results. Failure to return the funds penalized the political party by not participating in the next elections.

<sup>&</sup>lt;sup>453</sup> Democratic Conviction Party and Nisma Thurrje.

A positive development is the change that the electoral subjects that have received advance funds and can not reach the threshold of 1% should not return them, except in the case when they could not spend all those funds. In this case they return only the difference of unspent funds<sup>454</sup>, unlike the previous elections, when if the 1% threshold was not reached the funds received in advance had to be returned.

Fund made available from the state budget for the 2021 Assembly elections, referring to the Electoral Code<sup>455</sup>, was twice as much as the fund allocated for the 2017 general election<sup>456</sup>, which according to calculations concluded in the amount of 130,000,000 ALL. According to the decision of the State Election Commissioner (SEC), only ten political parties<sup>457</sup>, out of 27 which<sup>458</sup> competed as part of coalitions or separately, received funds from the state budget<sup>459</sup>. In the end it turned out that 86% of the total fund was distributed to only three political parties<sup>460</sup>, while 14% of it went to the other seven parties.

The political party that receives funds from the State Budget, before the distribution of the fund, signs an agreement with the CEC, which stipulates that the political party accepted the given fund, that it will use it in compliance with all conditions and obligations set out in law, accepted the monitoring of expenses incurred by the subject and candidates, as well as committed to respect all prohibitions set by law. The modalities of the cooperation agreement between the CEC and the political party that receives funds from the State Budget were determined by an instruction from the CEC<sup>461</sup>. This agreement was realized with every electoral subject that benefited funds from the state budget for the election campaign.

KRIIK considers this aspect as a positive step, because despite being formal, it imposes on the subjects to formally declare in advance on the recognition of legal obligations, publicly announces their commitment in relation to law enforcement, and facilitates and makes possible possible taking of respective measures in case of violation of legal obligations.

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<sup>&</sup>lt;sup>454</sup> Electoral Code of the Republic of Albania, Article 88, point 7.

<sup>&</sup>lt;sup>455</sup> Electoral Code of the Republic of Albania, Article 180 "Transitional provision for budget financing", point 4.

<sup>&</sup>lt;sup>456</sup> The fund allocated from the state budget for the 2017 elections was 65,000,000 ALL.

<sup>&</sup>lt;sup>457</sup> PSocialist Party of Albania 55,826,750 ALL, Democratic Party 33,318,149 ALL, Republican Party 3,926,232 ALL, Movement for National Development Party 1,434,012 ALL, Socialist Movement for Integration Party 18,975,182 ALL, Party for Justice, Integration and Unity 5,552,885 ALL, New Democratic Spirit Party 2,188,832 ALL, Christian Democratic Party 1,479,742 ALL, Social Democratic Party 1,629,360 ALL, Democratic Conviction Party 1,485,550 ALL. <sup>458</sup> The other parties are parties that participated in the 2015-2017-2019 elections, but in 2015 and 2017 did not meet the criteria of receiving 1% of the votes nationwide.

<sup>&</sup>lt;sup>459</sup> Referring to the results of the previous elections, if they were running in this election, the Social Democracy Party, the True Socialist Party and the Equal List Party (LIBRA) would have benefited.

<sup>&</sup>lt;sup>460</sup> The Socialist Party 44%, the Democratic Party 26% and the Socialist Movement for Integration approximately 16%.

<sup>&</sup>lt;sup>461</sup> <u>Instruction no. 3, dated 16.02.2021</u>, State Election Commissioner, "On the approval of the cooperation agreement between the State Election Commissioner and the political party that receives funds from the state budget and the Central Election Commission."

Funds from the state budget are distributed to political parties no later than five days from the registration of candidate lists<sup>462</sup>. It was noted that the decision<sup>463</sup> to distribute these funds, and their disbursement from the treasury, was implemented in excess of this legal deadline<sup>464</sup>. However, in a positive development from previous election processes, the funds were disbursed before election day.

The ABEOK Coalition appealed to the KAS the decision of the Commissioner for the distribution of public funds. The complaint requested a redistribution of funds, to include in it the member parties of this coalition being the parties that had mandates in the Albanian Parliament. The complaint used the wrong legal basis as it was based on Article 19 of the "Law on Political Parties", which refers to the distribution of annual funds to parties and not to election campaign funds.

KRIIK deems that this complaint shows on the one hand the continuation of the low legal culture of political parties and their lack of knowledge of the respective legislation, but, on the other hand, points out the distortion created by the fragmentation of political financing legislation into two different laws.

After the rejection of the appeal request by  $KAS^{465}$ , the decision was appealed to the Electoral College, which upheld the decision of  $KAS^{466}$ .

#### VIII.2.1.1.1 Redistribution of funds after the announcement of the final election result

Within ten days<sup>467</sup> from the issuance of the final result nationwide, the CEC determines by decision the monetary value of a valid vote, dividing the total fund approved by the total number of valid votes collected by political parties that have received not less than 1% of the valid votes nationwide.

In the April 25 elections only four electoral subjects<sup>468</sup> passed this threshold. The State Election Commissioner set the value of a valid ballot at 85 ALL<sup>469</sup>. No political party that had not received

<sup>&</sup>lt;sup>462</sup> Electoral Code of the Republic of Albania, <u>Article 88</u> "Funds from the State Budget for the financing of the parties participating in the elections" (amended by law no. 101/2020, dated 23.7.2020, added a sentence at the end of point 3 with law no. 118/2020, dated 5.10.2020), <u>point 6.</u>

<sup>&</sup>lt;sup>463</sup> <u>Decision no. 172 datë 23.03.2021</u>, State Election Commissioner, "On determining the amount of funds from the state budget that will be distributed as an advance to the political parties participating in the elections for the Albanian Parliament, dated April 25, 2021".

<sup>&</sup>lt;sup>464</sup> The disbursement of funds to political parties participating in the elections took place from 9-22 April 2021.

<sup>&</sup>lt;sup>465</sup> <u>Decision no. 13, dated 30.03.2021</u>, Complaints and Sanctions Commission "On the review of the appeal request no. 07, dated 25.03.2021 of the coalition People's Union - Immigration - Hour of Hope, and the Conservatives against the decision of the State Election Commissioner no. 172, dated 23.03.2021".

<sup>&</sup>lt;sup>466</sup> Vendimi No. 6, dated 08.04.2021, Judicial Electoral College.

Electoral Code of the Republic of Albania, Article 88 "Funds from the State Budget for the financing of the parties participating in the elections" (amended by law no. 101/2020, dated 23.7.2020, added a sentence at the end of point 3 with law no. 118/2020, dated 5.10.2020), point 2.

<sup>&</sup>lt;sup>468</sup> Socialist Party, Coalition Democratic Party - Alliance for Change, Socialist Movement for Integration and Social Democratic Party.

<sup>&</sup>lt;sup>469</sup> <u>Decision no. 428 dated 22.07.2021</u>, The State Election Commissioner, "On determining the monetary value of a valid vote for the elections for the Albanian Parliament of April 25, 2021."

advance funds reached the 1% threshold, therefore no party that had not received advance funds even benefited from the redistribution of funds after the elections<sup>470</sup>.

# VIII.2.1.2. Non Public Funds

#### VIII.2.1.2.1. Donations

Electoral subjects and candidates can accept private donations only from local natural and legal persons. Restrictions on private donations include a ban on the receipt of donations by a legal entity or any of its shareholders who has benefited from public funding, public contracts or concessions in the last three years worth over ten million ALL; exercises activities in the field of media; has been a partner with public funds in various projects; or has monetary liabilities to the State Budget or to any public institution.

Restrictions on donations from individuals or entities that have benefited from public money extend beyond the election, providing that natural persons or legal entities who have made donations to an electoral entity or its candidates in the election may not benefit for the period up to three years after the date of the elections public contracts, public-private partnership contracts or in any other way funds with a total value exceeding the amount of ten million ALL.

The Electoral Code defines the obligation of electoral subjects to make public and provide full and uninterrupted access of third parties to the database, where the electoral subject registers donations, loans or credits obtained by the subject itself and its candidates for amounts over 50,000 ALL<sup>471</sup>, but specifications on how this access is enabled and how the database is configured are missing. Meanwhile, the Central Election Commission did not address the detailed regulation of this provision in its regulatory acts, which makes it virtually unenforceable in practice.

Electoral Code<sup>472</sup> and instruction<sup>473</sup> of the CEC have defined, among other criteria necessary for the registration of electoral subjects, the obligation to open a special bank account number.

The CEC published on its website the account numbers for all electoral subjects<sup>474</sup>. However, audit reports on some electoral subjects<sup>475</sup> claim that the electoral subject did not open special campaign bank accounts.

<sup>&</sup>lt;sup>470</sup> <u>Decision no. 428 dated 22.07.2021</u>, The State Election Commissioner, "On determining the monetary value of a valid vote for the elections for the Albanian Parliament of April 25, 2021."

<sup>&</sup>lt;sup>471</sup> Electoral Code of the Republic of Albania, Article 92/1, "Financing of electoral subjects from non-public funds", point 5.

<sup>&</sup>lt;sup>472</sup> Ibid, Article 92/2, "Registration of non public funds", point 2.

<sup>&</sup>lt;sup>473</sup> Instruction No. 01, dated 23.12.2020, State Election Commissioner "On determining the rules for the submission and verification of candidacy documentation, deadlines for the publication of candidate lists and the approval of candidacy models".

<sup>&</sup>lt;sup>474</sup> <u>Data on bank accounts</u> of electoral subjects

<sup>&</sup>lt;sup>475</sup> The Democratic Conviction, the Social Democratic Party, the Christian Democratic Party, the New Democratic Spirit Party, the Knitting Initiative Party, the Movement for National Development Party, the independent candidate Pal Shkambi, the Agrarian Environmentalist Party and the New Movement Party are subjects that received incomes and incurred expenses during the election campaign.

It is not clear whether the CEC has published the accounts of the respective political parties, and not the special accounts in these cases, or whether it is an inaccuracy on the part of the auditors.

This information had to be filled in by the candidates who planned to accept donations over 50,000 ALL<sup>476</sup>.

It turned out that only 38 candidates<sup>477</sup> representing the three electoral subjects and three independent candidates submitted their bank account details to the CEC.

The amount donated by various individuals or entities to political parties for the elections of April 25, 2021 was 49,909,641 ALL, of which 4,124,978 ALL were monetary donations, 7,861,950 ALL in kind donations and 37,922,713 ALL membership fees

The declared in-kind donations turn out to be mainly electoral offices, and less fuel, printing of promotional materials, payments for social media, etc.

Regarding donations in monetary values<sup>478</sup>, there is a much lower number of donors and the monetary value donated to political parties for the effect of the election campaign, compared to previous elections<sup>479</sup>. The total amount donated in cash for the elections of April 25, 2021 was 4,124,978 ALL donated to 11 entities<sup>480</sup>.

## VIII.2.1.2.2. Self generated incomes by Subjects

The income generated by the electoral subjects themselves according to the law can be membership fees, loans and credits.

Apart from them, there were other entities that did not open special bank accounts, but the latter did not have any financial activity related to the campaign. These parties were: PBDSH, PKD, PLL, PBLD, POSH, PBPPSH, PESH, ADRE, PBK. <sup>476</sup> Electoral Code of the Republic of Albania, Article 92/2 "Registration of non public funds", point 3.

<sup>&</sup>lt;sup>477</sup> Six candidates of the Socialist Movement for Integration Party, two candidates of the Social Democratic Party, 27 candidates of the New Movement Party and three independent candidates.

<sup>&</sup>lt;sup>478</sup> Monetary donations to political parties: - The Democratic Conviction Party has 8 donors with 100,000 ALL each; - The Socialist Party has 20 donors with 50,000 ALL each; - The Socialist Movement for Integration Party has 1 donor with 50,000 ALL; - PBDNJ has a donor with 150,000 ALL (who is the chairman of the party); - The Movement for Change Party has 15 donors who have donated various amounts with a total value of 748,720 ALL;

Monetary donations to independent candidates: - Mr. Kreshnik Merxhani has 4 donors with different values with a total amount of 234,950 ALL; - Mr. Pal Shkambi has 1 donor with 102,250 ALL; - Mr. Iljaz Shehu has 4 donors with different values with a total amount of 210,150 ALL; - Mr. Boiken Abazi has 6 donors with different values with a total amount of 271,850 ALL and Mr. Elton Debreshi has 48 donors of different values with a total amount of 439,047 ALL.

<sup>&</sup>lt;sup>479</sup> In the previous elections, the following monetary donations were declared: - The total amount donated in the 2013 Parliamentary Elections was 84,882,620 ALL from 125 donors for 9 electoral subjects; - in the Local Elections of 2015 was 20,081,000 ALL from 70 donors for 2 electoral subjects; - in the Parliamentary Elections of 2017 was 10,224,985 ALL from 73 donors for 4 electoral subjects and in the Local Elections of 2019 was 1,921,425 ALL from 15 donors for 3 electoral subjects.

<sup>&</sup>lt;sup>480</sup> Specifically, there are 108 donors, 45 donors for 6 political parties and 63 for independent candidates

No entity has stated that it has taken out a loan or credit for the 2021 elections, despite declaring that there are cases of unpaid liabilities<sup>481</sup>.

It is evident that there are only 3 main political parties (SP, PD and LSI) which have declared income from membership fees<sup>482</sup> approximately 38,000,000 ALL, and income generated from the other accounts, respectively for each entity, which amounts to approximately 65,000,000 ALL. It should be noted that in the relevant self-declaration reports there are no further specifications from which account the incomes were concretely generated or how they were created. <sup>483</sup>.

Party	2013	2014	2015	2016	2017	2018	2019	2020	2021
SP	8,909,000	5,223,200	38,460,250	11,767,849	38,146,158	6,804,560	2,976,735		25,839,161
DP	1,500,000	0	0	0	181,045	2,014,303	1,302,950	5,377,825	10,258,792
SMI	0	0	17,184,732	32,617,860	14,203,270	5,306,260	4,254,990	2,913,700	1,824,760

Table of membership fees according to self-declarations of political parties

From the preliminary analysis that can be done to the table above on the membership quotas of political parties self-declared by them from 2013 until today, it is estimated that the income provided to political parties from the respective membership fees, have not had a performance that can be considered normal, given that from year to year the changes of the declared figures are very large, while according to the public statements of these parties, the increase of their membership has been continuously emphasized.

The situation becomes even more problematic if we take into account the fact that the membership of political parties and its number is not a legal obligation to be made public, or notified to a third institution, outside the political parties. The only legal and statutory obligation is the provision that each of the members must pay the membership fee regularly, as otherwise they may lose the membership as well.

The large difference of self-declared figures or the declaration of even zero annual membership fees, highlights the problem of regular dysfunction of the internal organization of political parties, and raises strong doubts about the sincerity and veracity of these statements, and consequently on sources of funding for these parties.

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<sup>&</sup>lt;sup>481</sup> According to self-declaration reports, the Democratic Conviction Party in the report has declared 522,113 ALL unpaid services (advertising spot in the media); The Democratic Party in the report has declared 90,000 ALL unpaid services (renting office space); The Justice, Integration and Unity Party in the report has declared 112,648 ALL unpaid services (rally fund and rally chairs).

<sup>&</sup>lt;sup>482</sup> SP has declared 25,839,161 ALL income from membership fees, DP has declared 10,258,792 ALL income from membership fees and SMI has declared 1,824,760 ALL income from membership fees.

<sup>&</sup>lt;sup>483</sup> Based on the ongoing review of the financial reports of political parties, part of these revenues may be from the annual funding of the state budget for these parties, as well as revenues generated by membership, quotas, membership cards, etc. The lack of balance of assets and liabilities for the period 06.09.2020-25.04.2021, makes it difficult to judge these resources. It remains the duty of the statutory auditor to verify and reconcile these statements also in the context of auditing the annual financial reports of these parties.

It is estimated that this aspect is an issue where even legal auditors find it quite difficult or almost impossible to check the veracity of information served by the parties themselves.

This situation deserves a detailed and complete legal regulation, moreover when the fact of being a member or not of a political party, is a condition for the qualification or not of the candidates for a number of official positions, especially in independent institutions and in those of justice.

### VIII.2.1.2.3. Candidates Incomes

Sources of campaign financing for candidates are private funding, the candidate's own resources, loans or credits, and financial support from the political party.

Candidates' incomes are subject to the same rules<sup>484</sup> and restrictions as political parties. Also, the candidate's self-financing is subject to the same rules as donation from third parties.

With regard to in-kind or cash funding from the political party under whose logo he is running, the candidate does not have the reporting obligation. The respective political party has this obligation.

From the self-declaration reports it is noticed that none of the candidates has declared to have received loans or credits in function of the respective election campaign.

Meanwhile, it turns out that 50% of the income is funding from the candidates themselves for their campaign, while the rest are: 9% in-kind donations and 41% of the proceeds in cash donations from third parties.

As the financing of the candidates' campaign is subject to the same rules as the political parties, in accordance with the provisions of the Electoral Code, any monetary donation over 50,000 ALL must be deposited in a special bank account opened by the candidate for this purpose.<sup>485</sup>.

From the review of the reports it is noticed that a considerable number of candidates<sup>486</sup> have received cash donations greater than the value allowed by law. As for the donations made through bank transfers, it remains the task of the audit to verify whether or not they were made through a special bank account.

<sup>&</sup>lt;sup>484</sup> Electoral Code Article 92/1 and Article 92/2.

<sup>&</sup>lt;sup>485</sup> Electoral Code Article Neni 92/2 point 2.

<sup>&</sup>lt;sup>486</sup> The following candidates have exceeded the legal limit for receiving cash donations:

<sup>-</sup> Socialist Party: Pranvera Resulaj 200.000 ALL, Vullnet Sinaj 322.110 ALL, Anila Denaj 285.202 ALL, Damian Gjiknuri 78.809 ALL, Ermonela Felaj 210.000 ALL, Xhemal Qefalija, Edmond Rushi 158.000 ALL, Ornaldo Rakipi 191.000 ALL, Kledina Skendo ALL.000.000 , Lela Berdica 400.000 ALL, Eduard Ndreca 345.100 ALL, Laert Duraj 137.865 ALL, Erion Brace 201.560 ALL, Arber Arapi 81.000 ALL, Florenc Spaho 98.553 ALL, Fadil Nasufi 258.000 ALL, Nasip Naco 100.000 ALL, Briseida Gjoza 69.800 ALL.

<sup>-</sup> Socialist Movement for Integration: Luljeta Skura 70.000 ALL, Bahri Shaqiri 70.812 ALL, Shemsi Prençi 70.000 ALL, Ramazan Topuzi 72.979 ALL, Endrit Brahimllari 90.000 ALL, Gentian Cala 109.650 ALL, Floida Kerpaçi 60.000 ALL, Faik Basha 123.120 ALL, Klodjan D , Luan Rama 144,200 ALL, Griselda Myslymi 116,100 ALL, Liri Dema 81,120 ALL, Anxhela Shenaj 61,000 ALL, Joana Ruçi 61,000 ALL, Blenard Monaj 51,200 ALL, Anxhela Kalivaçi 95,505 ALL, Dikens Bushaj 52,600 ALL, Merita Hoxha 70,000 ALL, Ramazan Topuzi 72. (this amount divided into several installments), Arben Rroko 86.200 ALL (this amount divided into 2 installments).

<sup>-</sup> PAA: Agron Duke 140,000 ALL.

<sup>-</sup> LRE: Asllan Hoxha 74.200 ALL (this amount is divided into two installments), Fitimtar Lala 236.000 ALL (this amount is divided into several installments), Bledar Lleshi 74.100 ALL (this amount is divided into several installments).

Also, it was noticed that in some cases a donation was made in an amount greater than 50,000 ALL, but the Beneficiary Candidates<sup>487</sup> did not specify in the relevant section of the financial report how the donation was made, as required by law.

In addition to how the donation was made, an integral part of the report format are other details that need to be completed, as it is for the reporting formats of political parties.

From the review of the reports, it was noticed that  $19^{488}$  have declared the receipt of funding from their personal sources to cover the expenses of the election campaign, after the end of the latter, even up to two months after the election day.

Despite the fact that these are personal sources of income, this situation shows at least a low level of information on legal obligations and negligence in their implementation.

### VIII.2.2. Expenses for Electoral Campaign

The Electoral Code stipulates that campaign expenditure is any expenditure incurred for campaign purposes, whether incurred by the party, its candidates or its affiliates.

The total amount of expenditures incurred in function of the election campaign for the elections of April 25, 2021 is 295,928,351 ALL spent by 20 electoral subjects<sup>489</sup>, including their candidates<sup>490</sup>.

The items for which the subjects have spent more are the media that occupy 39% of the expenditures<sup>491</sup>, the electoral activities with 18% of the expenditures, the production of promotional materials that occupy 15% of the expenditures, the consulting with 10% of the expenditures<sup>492</sup>, election offices 3% as well as transport and other expenses 6%.

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<sup>&</sup>lt;sup>487</sup> SP candidates: Niko Kurri 105,000 ALL, Eduart ShaSMI 278,000 ALL, Pandeli Majko 270,080 ALL, Alfred Muharemi 247,000 ALL, Halim Dauti 267,197 ALL.

Candidates of the Socialist Movement for Integration: Agron Çela 430.000 ALL, Edmond Ndou 290.000 ALL, Lindita Reçi 260.000 ALL, Ilir Hyseni 230.000 ALL, Somela Radohima 150.000 ALL.

<sup>&</sup>lt;sup>488</sup> - SP candidates: Eduart ShaSMI donated 175,000 lek to himself on 30.06.2021; Eduard Ndreca donated 345,100 ALL to himself on April 30, May 31 and June 2.

<sup>-</sup> SMI candidates: Endrit Brahimllari donated 90,000 lek cash on 22.05.2021; Griselda Myslymi donated 86,100 ALL in several installments between May 10 - May 18; Lindita Reçi donated 260,000 ALL to herself on 19.05.2021; Dikens Bushaj donated 52,600 ALL to himself on 19.05.2021; Ilir Hyseni donated 230,000 ALL on 19.05.2021; Klajda Gjosha donated 125,000 in two installments through bank transfer on 11.05.2021 and 18.05.2021; Arben Çuko donated 30,000 ALL cash on 04.05.2021; Liri Dema donated 81,120 ALL cash on 05.05.2021 and 10.05.2021; Floida Kerpaçi donated 60,000 ALL cash on 31.05.2021; Somela Radohima donated 150,000 ALL cash on 19.05.2021; Angela Shenaj donated 61,000 ALL cash on various dates in May; Christian China donated 10,000 lek cash to himself on 24.05.2021; Joana Ruçi donated 61,000 ALL cash on 04.06.2021; Ramazan Topuzi donated 20,004 ALL to himself on 24.05.2021; Silva Caka donated 15,000 ALL on 08.06.2021; Besnik Jakaj donated 25,500 ALL on 25.05.2021; Everton Shehu donated 47,000 ALL to himself on 25.05.2021; Vojo Bregu donated 200,000 ALL to himself on 16.07.2021 through bank transfer; Arben Rroko donated 86,200 ALL cash on 05.05.2021 and 12.05.2021.

<sup>&</sup>lt;sup>489</sup> 15 political parties and 5 independent candidates.

<sup>&</sup>lt;sup>490</sup> The amount spent by the parties is 249,971,004 ALL and the amount spent by their candidates is 45,957,347 ALL.

<sup>&</sup>lt;sup>491</sup> Of which 31% for traditional media, mainly television and 8% for social media.

<sup>&</sup>lt;sup>492</sup> Only SP and DP have declared consulting costs.

Electoral Code<sup>493</sup> sets the maximum level of expenditure that can be incurred by a political party, including its candidates, in the function of the electoral campaign, which should not be more than 3 times the maximum value received by an electoral subject from public funds in function of the campaign. For these elections this value is estimated at 167,480,250 ALL<sup>494</sup>.

It is noted that the Socialist Party, including its candidates, has exceeded the spending limit by about 4.5 million ALL (has spent 172,046,612 ALL). Decision no. 18 of the Regulatory Commission<sup>495</sup> provides for an administrative sanction for this violation.

Not only the complete and true declaration, but also the proper documentation of expenditures according to the tax legislation in force, is a very important part of the financial reports of electoral subjects in the function of transparency and law enforcement. Compliance and regularity of tax invoices is the subject of the work of statutory auditors, appointed by the CEC, who audited the funds received and spent by political parties during the election campaign.

Expenditures incurred by electoral subjects should be guided not only by the principle of truthfulness, but also by accountability.

By law, campaign expenditure is any expenditure incurred by a party or its candidates for election campaign purposes regardless of the time at which it was incurred. In this sense, parties should have an approach that reflects their maximum responsibility, both at the principled and political level, and in the fourfold implementation of the rules and legal procedures provided.

It is by no means in the spirit and letter of the law that the financial support given to political parties from the state budget for the conduct of the election campaign, be used for liquidation of bills carried over from previous periods, and still unpaid, or for food expenses in supermarket, as some parties have stated in their reports.

Funding for the election campaign is provided with the main purpose that voters can be better informed about the electoral offer of each of the competing parties. The use of funds beyond this goal is at least a misuse of support with public money by Albanian citizens.

In this perspective, in view of the transparency of expenditures of funds obtained from the state budget and their good management, it is required to bring to attention and consider the proposal of some statutory auditors in previous years on the application of public procurement law in the their spending process.

On the other hand, it is also required to make the necessary and detailed legal regulation, which provides that public funds not spent according to fiscal and tax rules, or spent for non-electoral purposes, be returned to the state budget by the respective parties.

In KRIIK's judgment, the impossibility or inability of any electoral subject to act responsibly and manage public funds truthfully and in full respect of legal provisions, is at least the impossibility and inability to exercise public responsibility in the exercise of duty as elected by the people.

<sup>&</sup>lt;sup>493</sup> Electoral Code of the Republic of Albania, Article 92/2, "Registration of non-public funds", point 4.

<sup>&</sup>lt;sup>494</sup> Triple the highest amount, which was won by the Socialist Party in the amount of 55,826,750 ALL..

<sup>&</sup>lt;sup>495</sup> <u>Decision no. 18 datë 14.04.2021</u>, ... Violation of the maximum limit of expenses by an electoral subject is punished with a fine of 5 000 000 ALL or with a fine equal to the amount that has exceeded the limit, whichever is higher."

### VIII.2.2.1. Expenditures for electoral activities and rallies

The total amount spent for the development of electoral activities, according to the calculations of the item of rallies, gatherings and campaign activities is 44,160,147 ALL, spent by 5 electoral subjects<sup>496</sup>.

Self-declaration reports should include data on any expenditures made, even indirectly, for each rally held by electoral subjects. The full reflection of the data in the special section provided in the reporting formats would provide a systematic overview of the rallies held, including a more complete and clear recording of expenditures. This part of the reporting format requires the electoral subject to provide financial information about the campaign rallies, according to the value spent on each event, which provides the opportunity and provides a sufficient overview of expenditures to conclude how much such an activity can cost.

From the review of all reports, it results that none of them has fully completed this section of the report.

Even for those parties that have partially completed<sup>497</sup> it, it is impossible to create a clear panorama of the activities carried out and the respective costing of each of them.

The Justice, Integration and Unity Party is the only party to which the reports in the expenditure section and the specific section of the rallies are of equal value<sup>498</sup>.

The Socialist Party and the Socialist Movement for Integration state different values<sup>499</sup> in the expenditure section, in the item of rallies and gatherings, and in the expenditure section for rallies in the report.

The Democratic Party has not completed anything in the rally spending section. Meanwhile in the expenditure section declares the amount of 147,732 ALL spent on rallies.

It is estimated that taking into account all the activities carried out by this party during the election campaign, which has conducted election activities in each municipality, as well as the opening and closing rallies of the election campaign, this statement is not true and does not reflect real costs.

# VIII.2.2.2. Expenses for electoral offices

Keeping track of the number of electoral offices, referring to the legal obligations that arise to electoral subjects at the time of opening an office, should be a simple mathematical calculation process.

From the consultation of the reports of the electoral subjects, it is noticed that there is a discrepancy in the declared figures with the information coming from the reports of the monitors appointed by the CEC, as well as from the monitoring carried out by the KRIIK observers in the field.

<sup>&</sup>lt;sup>496</sup> Of which 4 are political parties and 1 independent candidate.

<sup>&</sup>lt;sup>497</sup> Socialist Movement for Integration Party, Socialist Party and Justice, Integration and Unity Party.

<sup>&</sup>lt;sup>498</sup> The Justice, Integration and Unity Party has reflected 484,648 ALL spent on rallies in Fier and Vlora.

<sup>&</sup>lt;sup>499</sup> Specifically, the SP according to the relevant section of expenditures in the report, in the item rallies / gatherings and activities, declares 40,246,286 ALL spent, while in the section of expenditures for campaign rallies has reflected 9,260,000 ALL spent for rallies. SMI according to the expenditure section in the report on the item rallies / gatherings and activities declares 3,267,891 ALL spent, while in the expenditure section for campaign rallies has reflected 1,970,000 ALL spent.

Specifically, the monitors have identified 660 polling stations in the field, KRIIK observers have identified 651 electoral offices, while the self-declaration reports, considering them complete and accurate 500, show that electoral subjects have declared a total of 426 electoral offices 501 throughout the country.

In addition to the offices reported by electoral subjects, the Socialist Party and the Socialist Movement for Integration also reported election offices set up by the candidates, 24 and 29 offices, respectively. It is not clear whether these electoral offices are included in the report submitted by the Party or whether they are additional.

<sup>500</sup> The calculation of the number is done by calculating: in the DP, all declarations in in-kind donations as election offices, as well as in the SMI any description declared in the expenses as office rent.

The assessment in the SMI report was made taking into account everything that was stated there correct and obvious, while KRIIK noticed that some statements were made incorrectly, as there were repetitions of items / declarations of in-kind donations and expenses.

<sup>501</sup> From the comparison of the findings it is concluded that:

- Socialist Party: according to KRIIK observers 266 offices, according to monitors 252, according to self-declaration report 230;

- Democratic Party: according to KRIIK observers 240 offices, according to monitors 262, according to self-declaration report 41;

- Socialist Movement for Integration: according to KRIIK observers 80 offices, according to monitors 75, according to self-declaration report 71;

- Social Democratic Party: according to KRIIK observers 18 offices, according to monitors 13, according to self-declaration report 0;

- Justice, Integration and Unity Party: according to KRIIK observers 16 offices, according to monitors 15, according to self-declaration report 22;

- New Movement Party: according to KRIIK observers 8 offices, according to monitor reports 1, according to self-declaration report 0;

Nisma Thurrje: according to KRIIK observers 5 offices, according to monitors 2, according to the self-declaration report 0;

- Democratic Conviction: according to KRIIK observers 5 offices, according to monitors 5, according to self-declaration report 0;

- Independent candidate Elton Debreshi according to KRIIK 1 observers, according to monitor reports 0, according to self-declaration report 0;

- Independent candidate Iljaz Shehu according to KRIIK 1 observers, according to monitor reports 0, according to self-declaration report 1.

- Agrarian Environmentalist Party: according to KRIIK observers 2 offices, according to monitor reports 0, according to self-declaration report 0;

- New Democracy Alliance: according to KRIIK observers 2 offices, according to monitors 0, according to self-declaration report 0;

- New Democratic Spirit: according to KRIIK observers 2 offices, according to monitor reports 0, according to self-declaration report 0;

- Movement for Change: according to KRIIK observers 2 offices, according to monitor reports 0, according to self-declaration report 2;

- Christian Democratic Party of Albania: according to KRIIK observers 1 office, according to monitors 0, according to self-declaration report 0;

- Christian Democratic Party: according to KRIIK observers 1 office, according to monitor reports 0, according to self-declaration report 0;

- Republican Party: according to KRIIK observers 1 office, according to monitor reports 0, according to self-declaration report 0;

Meanwhile, KRIIK observers have identified a total of 133 polling stations which were branded by specific candidates, but it turns out that they were not reported by the candidates themselves<sup>502</sup>. Also, it turns out that at least 68 candidates who have branded an election office, identified by KRIIK observers, have not declared expenses for election offices. Again, even in this case it is unclear whether these election offices were paid for by the parties and are included in their financial reports, or are unreported.

What is noticed from the reporting regarding the election offices is that, in some cases the prices stated in the self-declaration reports do not represent the real market value in the respective area of the location nor the reference price for that area.

KRIIK observers conducted a rough estimate of the area of the identified electoral offices, as well as reported their geographical location.

Based on these data, and referring to reference prices, according to the Decision of the Council of Ministers of 2019<sup>503</sup>, the total spent on electoral offices identified by KRIIK is about ALL 7.5 million per month<sup>504</sup>. Calculating that electoral offices stations have been rented for at least two months by a significant proportion of electoral subjects, and in many cases beyond this period, this figure is minimally doubled.

On the other hand, it is worth considering that the reference price is not the real market price, but much lower than it. KRIIK collected information about the market price from real estate companies for the Municipality of Tirana, and it turns out that the real price exceeds that of the reference by at least twice.

So in the resultant, the total amount calculated from the reference prices could quadruple (a conservative estimate), bringing it to around ALL 30 million. Meanwhile, in total, electoral subjects reported about 10,452,101 ALL as expenses for election offices, of which 3,645,763 ALL were declared by candidates, 6,656,588 ALL by political parties and 149,750 ALL by independent candidates.

Again, it remains unclear whether the expenditures declared by electoral subjects (political parties) include the declarations of candidates, further complicating the comparison of figures, or whether these expenditures are declared separately.

In any case, in the judgment of KRIIK, it is estimated that the declared expenditures for election offices seem to be far from real values, taking into account, at a minimum, only the above two factors, the market price and the duration of maintaining the environment as an election office.

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<sup>&</sup>lt;sup>502</sup> Number of candidates who had their posters outside the electoral offices, according to electoral subjects: 64 from the Socialist Party, 32 from the Democratic Party, 19 from the Socialist Movement for Integration, 5 from the Democratic Obedience, 3 from the New Movement Party, 3 from the Social Democratic Party, 2 from the Nisma Thurrje, 2 from the New Democracy Alliance Party, 2 from the Justice, Integration and Unity Party and 1 from the Christian Democratic Party.

<sup>&</sup>lt;sup>503</sup> Decision no. 168, dt. 27.03.2019 of the Council of Ministers "On some changes in Decision no. 132, dated 7.3.2018, of the Council of Ministers" On the methodology and determination of the taxable value of immovable property" Building ", the tax base for specific categories, the nature and priority of information and data for determining the tax base, as well as criteria and rules for alternative assessment of tax liability".

<sup>&</sup>lt;sup>504</sup> The calculation was performed by considering the premises used for election offices as service premises (shops), since they are on the first or second floors of buildings, with entrance from the street, clearly premises that meet the criteria for service premises.

## VIII.2.2.3. Media expenditures

Expenditures made for the media occupy the largest place in the total expenditures made by electoral subjects.

Despite the fact that the Electoral Code<sup>505</sup> sets a time limit of 90 minutes for political advertising for each party, half of which must be provided free of charge by the relevant media, from AMA monitoring this limit has been exceeded by many televisions and electoral subjects.

The Electoral Code stipulates that every media outlet must deposit with the CEC, before the start of the election campaign, the fees it applies in relation to political advertising throughout the election campaign. This legal obligation was fulfilled by only 17 media<sup>506</sup>.

A very important element related to the provision of free advertising, such as the explicit obligation that the Electoral Code<sup>507</sup> imposes on the CEC and the Ministry of Finance, to draft a joint instruction on billing procedures by the media to political parties regarding the political advertising that they perform in these media during the election campaign, was not implemented.

From the review of the reports it is noticed that the expenses realized under media item were declared by only 7 political parties, 1 independent candidate and 13 candidates for deputies, in a total amount of 78,350,572 ALL<sup>508</sup>.

According to the monitoring conducted by AMA, in the Albanian media were broadcast during the 30 days of the election campaign 9,260 minutes of advertising by 15 subjects<sup>509</sup> on 33 monitored televisions.

Referring to all of the above, based on the minutes of advertising for each subject on each of the televisions monitored by AMA, as well as the media tariffs for political advertising filed with the CEC, after a rough calculation<sup>510</sup> is observed a very high difference between the figure reported by the subjects and that calculated. The difference turns out to be at least 690,000,000 ALL, which is about 9 times higher<sup>511</sup>.

<sup>&</sup>lt;sup>505</sup> Electoral Code, Article 84 point 5.

<sup>506</sup> Media Tariffs. The media that filed advertising fees with the CEC during the election campaign were: Top Channel, Top News, A2 CNN, News 24, TV Klan, Tv Klan plus, ABC News, Ora News, Ora TV, Vizion Plus, Fax News, Euronews, Report TV, Media Mapo, MCN TV, Balkanweb.com, Channel One.

<sup>&</sup>lt;sup>507</sup> Electoral Code, Article 84 point 6 "The CEC, the regulatory body for audiovisual media and the Ministry of Finance are in charge of issuing the relevant instructions."

<sup>&</sup>lt;sup>508</sup> Of which 76,503,757 ALL were declared by the parties and 1,846,815 ALL by the candidates.

<sup>&</sup>lt;sup>509</sup> Of which 14 political parties and 1 independent candidate.

<sup>&</sup>lt;sup>510</sup> As some media outlets do not publish the tariffs they have applied for, and advertising prices vary according to the schedule and mode of transmission, KRIIK has calculated an approximate average cost per second of advertising in each of the media outlets that have published the official tariffs.

<sup>&</sup>lt;sup>511</sup> For more see Annex T "Data on the declaration and expenditures of electoral subjects in the media".

Regarding this discrepancy, the Central Election Commission also sent a letter to seven political parties<sup>512</sup> requesting further clarifications regarding the discrepancies in their statements, two of which<sup>513</sup> have not yet returned an official response to the CEC.

In addition, the parties that have reacted to the request of the CEC, with their responses<sup>514</sup> make the situation even more absurd by delegating responsibility to the media, which is formally a company that can provide services only based on pre-concluded contracts, such as and accompanying them with the relevant invoice.

From the returned answers, there are cases when the electoral subject claims that the media may have broadcast advertisements without his knowledge, which according to them does not burden the electoral subject with the responsibility of declaring at all. This claim does not stand, because even if the case were true, there are at least three violations of the law, non-declaration as donation, exceeding the limit set for political advertising, and prohibition of donation by shareholders, owners and media companies.

Following this situation, according to the official information received from the CEC, only the SMI subject addressed an official e-mail<sup>515</sup> to some media asking them if there was a contract between it and the media in question.

Such a request, which requires a copy of a contract where one of the parties is the subject himself under the allegation of ignorance is frivolous and raises doubts about the information he seeks to be conveyed through this communication.

On the part of the media, which confirm the non-existence of a contract, it is stated<sup>516</sup> in one case that the AMA was asked to be correct in the airtime for the election campaign against all parties, and for this reason the television broadcast spots without contractual relations during that period.

This statement, in addition to evidencing ignorance of the law, also constitutes a legal violation.

<sup>512</sup> The Social Democratic Party, the Socialist Party, the Democratic Party, the Socialist Movement for Integration Party, the Democratic Conviction Party, the Nisma Thurrie Party and the Movement for Change Party.

<sup>&</sup>lt;sup>513</sup> Democratic Party and Movement for Change Party.

<sup>&</sup>lt;sup>514</sup> Excerpts from the responses returned to the CEC by:

<sup>-</sup> Socialist Party: "... SP has reported all expenses of the media service in the financial report submitted to the CEC. "Every expense is accompanied by a contract between us and the media company...".

<sup>-</sup> PSD: "... Any expenditure made to the visual media, but which is not accompanied in writing by the PSD logo and the signature of its leaders, we consider irregular and do not bear responsibility. ... "

<sup>-</sup> Democratic Conviction: "As we have reported, BD has had a contract for broadcasting commercials with only 3 televisions. These TV stations have broadcast BD electoral spots against the amounts specified in the contract. Televisions are commercial companies and as such have the discretion to enter into different contracts at different prices. The only price to be considered by the CEC is only the contract price. ... "

<sup>-</sup> Nisma Thurrje: "... If these expenses were incurred, they would be subject to tax invoice declaration to the tax authorities. We invite you to verify our assertions with the financial reports made by the audiovisual media to the tax authorities. ... "

<sup>-</sup> SMI: "... Please make available the supporting documentation regarding the findings of non-compliance."

<sup>515</sup> Official e-mail to Report TV and Fax News: "... The CEC has sent to the SMI subject a request for a copy of the contract with your institution. While we do not have any such contract in our protocol, because this relationship did not exist, please confirm us if there is or has been a contractual relationship between us. ... "

<sup>516</sup> Fax Media News: "There is no contractual relationship between us. During the election period of April 25, AMA demanded that the media be correct in the timing of the election campaign of all parties and be as "fair" as possible. For this reason, the television has also broadcast spots without contractual relations during this period. "

The law defines<sup>517</sup> the obligation for balanced and timely airtime according to the provisions of the Electoral Code in the broadcasting of news editions on electoral subjects and not for political advertising, which has a completely different regulation.

Furthermore, by law<sup>518</sup>, any entity operating in the field of media, and none of its shareholders, can make donations to any electoral entity.

In addition to the above situation, it is noticed that there are parties which have declared expenses and payments made to some televisions, while the monitoring of the latter by the AMA, shows that these media have not broadcast any political ads for the subjects in question<sup>519</sup>. This fact raises doubts about the type of service received by political parties from these media for which payment was made, which brings to attention another aspect, *potentially very problematic, which should be investigated by the CEC and which should be clearly regulated and specifically in the legal framework*.

### VIII.2.2.4. Expenditures on political ads on Facebook

Thanks to the transparency mechanism built by the social network Facebook, the spending on political advertising on the social networks *Facebook and Instagram* is transparent and readable by everyone.<sup>520</sup>.

## VIII.2.2.4.1. Advertisements from political parties and independent candidates

During the calendar period corresponding to the election campaign, a total of about 33.2 million ALL was spent on political ads on *Facebook and Instagram*<sup>521</sup>.

Meanwhile, a total of about 28.4 million ALL expenditures for political advertisements on social media have been declared by electoral subjects.

The undeclared amount is judged to be greater than the difference of the above amounts (of ALL 4.8 million), as the declaration by electoral subjects includes "social media", ie not only *Facebook and Instagram*. Meanwhile, it is noted that only *Facebook and Instagram* are counted in the amount calculated as spent<sup>522</sup>.

<sup>518</sup> Electoral Code, Article 92/1 point 3 "It is prohibited to provide funds by a legal entity or any of its shareholders if it is in one of the following conditions: b) exercises activities in the field of media"

<sup>&</sup>lt;sup>517</sup> Electoral Code, Article 84.

<sup>&</sup>lt;sup>519</sup> - *PDIU* reports that it has paid for TV Gold a bill worth 60,000 ALL, for TV Abc News the bill worth 300,000 ALL and for TV News 24 the bill worth 369,420 ALL. Meanwhile, from the monitoring of AMA, it results that this subject has not realized any minute of political advertisement in these media.

<sup>-</sup> The *Republican Party* reports that it has paid the bill worth 1,495,000 ALL for TV Klan and the bill worth 1,060,000 ALL for TV Top Channel, while the AMA monitoring shows that this subject has not made a single second of political advertising in these media.

<sup>-</sup> The *Movement for Change Party* reports that it has paid for TV Klan the bill worth 515,425 ALL, while the AMA monitoring shows that this subject has not realized a single second of political advertising in this media..

<sup>&</sup>lt;sup>520</sup> See Facebook Political Ad Library for Albania.

<sup>&</sup>lt;sup>521</sup> In the calculation made advertisers, who have spent less than US \$ 100 on advertising during the mentioned period, have been calculated with a minimum spending value of USD 10. This is because the expenses made below the value of 100 USD are not determined accurately, but by rank, making it impossible to record the exact value spent.

<sup>&</sup>lt;sup>522</sup> For more see Annex R - Table R4 "Candidates who have declared expenses for social media, but according to the advertising library on Facebook and Instagram have not made expenses."

Of the expenses incurred ALL 12.6 million were paid by the candidates, 16.8 million ALL were paid by the political parties<sup>523</sup> and 3.8 million ALL are expenses incurred by third parties on behalf of the Socialist Party.

Of these, 56.2% (about ALL 18.6 million) were spent on advertising on behalf of the Socialist Party, 27.2% (about ALL 9 million) on behalf of the Democratic Party and 5.6% (about ALL 1.8 million) on behalf of the Socialist Movement Party for Integration. All other electoral entities have spent amounts of much less value<sup>524</sup>.

The ads are generated from the official websites of the candidates, the official websites of the party, the websites of the party branches in the districts as well as from third parties.

A major concern is the generation of ads by third parties, such as some *Facebook* pages, which are not directly affiliated with any of the political parties, while not even appearing as reported in the financial self-report of none of the electoral subjects.

The shadow campaign continues to be a very disturbing phenomenon and one of the ways of hiding the expenses of the election campaign. The data generated by Facebook is an illustration of this phenomenon about which KRIIK has continuously raised its concern.

In this election, six Facebook pages were identified, which have generated paid advertisements, despite the fact that they are not directly affiliated with any political force.

Of these sites, five have generated ads for the Socialist Party<sup>525</sup> and one site for the Democratic Conviction<sup>526</sup>.

The five pages that generated ads for the Socialist Party, with the exception of one, were newly created during the election period. All these sites totally stopped their activity only a few days before or immediately after election day. It is noted that the phone number and location of the administrators of these sites are the same for almost all sites, meanwhile the contact number and account address from which the payment for advertising was made are still the same for all these sites.

All of the above are clear indications that these sites have been coordinated and have been used for a clear electoral purpose.

<sup>&</sup>lt;sup>523</sup> For more see Appendices O, P and R.

<sup>&</sup>lt;sup>524</sup> All other entities have spent 10% of the total amount spent on Facebook and Instagram by all electoral entities.

<sup>&</sup>lt;sup>525</sup> - <u>Untold Stories of Albania</u>, a site created in January 2019 that had no political character from January to May 2019. Has spent about 16,005 USD. From May 2019 the site has been inactive and has been reactivated in mid-December 2020 by starting to post denigrating ads about the opposition. This page has not been posted since April 23, 2021 and has been deleted around September 2021.

<sup>- &</sup>lt;u>Punë Punë</u>, site created in September 2020. Has spent about \$ 6,555. This page has not been posted since April 20, 2021.

<sup>- &</sup>lt;u>Ligi dhe Rend</u>, site created in November 2020. Has spent about \$4,132. This page has not been posted since April 21, 2021.

<sup>- &</sup>lt;u>Te jesh grua</u>, site created in November 2020. Has spent about \$ 5,352. This page has not been posted since April 20, 2021.

<sup>- &</sup>lt;u>Pakëz drite</u>, site created in September 2020. Has spent about 4,768 USD. This page has not been posted since April 29, 2021.

<sup>&</sup>lt;sup>526</sup> Egnatia News, page created in November 2020. This page is a page of an *online media* (egnatianews.com), portal, which was created in November 2020.

The amount spent by all five of these sites is very high, 36,810 USD (about 3.8 million ALL), which is 38% of the amount spent from the official Facebook accounts of the Socialist Party for advertising on this social network

# VIII.2.2.4.2. Advertisements of electoral subjects candidates

The income and expenses of the candidates are included as a total value in the report of the political party under the logo of which they are running, but the itemization of the total value spent is done in the personal report of each candidate.

As mentioned above, the number of candidates who have not submitted a self-declaration report to the CEC is quite high, ie 1,166 candidates out of a total of 1,820

The situation becomes even more problematic when it is ascertained that some of these candidates have in fact incurred expenses for Facebook / Instagram ads. This is proven thanks to the option provided by facebook, where the expenses incurred can be controlled by external third parties. This fact also applies to cases where the expense was not paid by the candidate himself, but by a donor. In such a case the payment in function of the candidate's website, as well as for his election office paid by third parties, should have been declared by the candidate as an in-kind donation.

Out of a total of 1,820 candidates, based on the Facebook Ad library<sup>527</sup> it results that 167 of them have made payments for advertising on Facebook or Instagram<sup>528</sup>, but only 81 of them have declared expenses for social media in self-declaration reports submitted to the CEC. 529.

The rest of the candidates either did not submit a self-declaration report, or submitted a report with 0 income and expenses or in the relevant financial statement did not declare expenses for social media. The total amount spent on candidates for election campaign purposes turns out to be about ALL 17.4 million, of which about ALL 4.8 million were paid by political parties for the respective candidate sites and ALL 12.6 million were paid by the candidates themselves or other persons.

Meanwhile, the total amount declared by the candidates from the self-declaration reports is 8,216,760 ALL, which includes those advertisements paid by the respective political parties. As a result, it turns out that about 4.5 million ALL have not been declared by the candidates.

From the review and processing of the collected data, it results that 63 candidates have made payments for political advertisements on their respective Facebook and Instagram pages<sup>530</sup>, but have not submitted a self-declaration report at all, as the legal obligation stipulates.

Of these candidates, 42 of them have personally made the respective payments, which amount to about 4.4 million ALL.

<sup>527</sup> See Ads Library in Facebook

<sup>528</sup> There are a total of 194 candidates, for whose sites political advertisements have been paid, but for 27 of them the payment has been made in whole or in part by the political party that nominated them.

For more see Annex R - Table R1 "Candidates who have declared expenses for social media and the amount spent according to the Ads Library on Facebook and Instagram".

<sup>&</sup>lt;sup>530</sup> For more see Annex R - Table R3 "Candidates who have not submitted a report, but according to the Ads Library on Facebook and Instagram have expenses on these platforms".

Another 69 candidates, from those who submitted a self-declaration report, declare zero income and expenses in total in their reports, or zero expenses for social media, while it appears that they have incurred expenses for political advertisements on their respective pages in Facebook and Instagram<sup>531</sup>, in an amount of nearly 3.6 million ALL

The candidate with the highest value spent on the election campaign is Agron Shehaj with about 16.5 million ALL spent on Facebook and Instagram.

After him, the candidate for whose site was paid the most, is Lulzim Basha with the value of 1,970,000 ALL, but the payments for this were made by the Democratic Party. All the rest of the candidates have incurred expenses worth less than 700,000 ALL.

The lack of complete information on the legal framework of financial reporting by candidates is considered quite problematic.

In addition to the cases of non-declaration of expenses incurred, there are also cases when the expenses were paid by the political party, while the candidates declare them as their expenses, which is contrary to the instructions approved by the CEC.

In the continuation of the analysis and processing of data, even with access to the annual reports, the expenses made on Facebook are seen even after the date of the elections until the end of the financial year. It turns out that 24 candidates for MPs have made expenses even after the end of the election campaign, while among them are those who have not submitted a report at all or have declared it with  $zero^{532}$ .

#### VIII.3. Transparency

## VIII.3.1. Self-declaration of electoral subjects

The legal framework does not oblige electoral subjects to make public revenues and expenditures before election day and, on the other hand, none of the electoral subjects provided such transparency voluntarily<sup>533</sup>, although public calls were not lacking.

The law stipulates that electoral subjects must submit a financial self-declaration report to the CEC within 60 days of the announcement of the election results.

Based on the analysis conducted on the self-declaration reports, a number of problems are identified in the transparency process made by the electoral subjects themselves regarding revenues and expenditures.

<sup>531</sup> For more see Annex R - Table R2 "Candidates who have declared 0 income and expenses, but according to the Ads Library on Facebook and Instagram, payments have been made for their sites, by the candidate or by third parties".

<sup>&</sup>lt;sup>532</sup> For more see Annex R - Table R5 "Candidates who have spent on Facebook and Instagram even after election day."

<sup>533</sup> KRIIK called on electoral subjects, in the spirit of transparency, to make public their income and expenditure before election day voluntarily, at a Press Conference on March 11, 2021.

Despite the approval and making available to electoral subjects ready-made and simple reporting formats, or even trainings conducted with political parties continuously by the CEC or other actors, the situation of financial reporting even in the elections of April 25, 2021 remained at basic and formal levels, not guaranteeing full transparency of funds received and spent during the campaign.

In addition to the low level of accountability of the electoral subjects themselves, the approved formats also carry issues that need to be reflected and improved.

Thus, in the format of the self-declaration report, the electoral subject does not include in the summary table of revenues and expenditures, the expenses incurred by the candidates, but presents them only as a summary of total values aggregated on a district level.

Also, the necessary explanation required according to the instructions in each part of the report, whether for detailing and good understanding of revenues or expenditures, is not properly completed by the entities. It is also found that most of the candidate reports are missing.

All of the above, makes transparency, understanding and consequently control or audit very difficult, even in conditions when hypothetically any financial move would have been fully declared by the entities.

Apart from the truncated inclusion of candidates in the self-declaration reports of electoral subjects, another major problem remains their superficial filling by the subjects themselves.

Explanatory parts of expenses and donations, whether in cash or in kind, are almost never completed, leaving room for various interpretations or allusions.

This makes it difficult to understand the situation and analyze the reported data.

In the self-declarations of the electoral subjects for the elections of April 25, 2021, it is not understood who paid for the various electoral offices, in which photos of specific candidates, the party or the candidate, were placed.

Also, if the party declares expenditures for social media made by itself, it remains unclear whether the declared amount includes payments made, by the political party itself, for candidate sites. This element remains unclear after observing the self-declaration reports of the candidates, where despite the fact that according to Facebook an advertisement was paid by the party for the candidate, the latter in some cases declares it as his own expense and in other cases does not declare it.

All this situation leaves opportunities for abuses and makes it difficult to verify, especially having as an controlling authority an institution, which in its current practice has shown passivity in terms of controlling the finances of political parties.

The Electoral Code stipulates that electoral subjects submit a financial self-declaration report to the CEC within 60 days<sup>534</sup> of the announcement of the election results. The rules, deadlines and reporting formats were approved by a decision of the Regulatory Commission. The novelty for financial self-reporting in these elections was the obligation for independent candidates to report as well<sup>535</sup>.

<sup>535</sup> <u>Decision no. 13, datë 06.04.2021</u>, Regulatory Commission "On determining the rules for financial reporting of electoral subjects, control and verification of their financing and expenditures during the election campaign", Article 3 point 1.

<sup>&</sup>lt;sup>534</sup> Electoral Code of the Republic of Albania, Article 92/3 point 1.

The declarations of each electoral subject must include any financial data, income and expenses, incurred not only during the election campaign, but up to six months before the election campaign, as well as any other expenses incurred in function of the election campaign<sup>536</sup>, regardless of when it was performed.

In addition to the self-declaration report, the format of which is approved by the CEC, political parties must submit to the CEC the balance of their assets and liabilities for the period from the decree of the election date to the election date<sup>537</sup>, ie from September 6, 2020 until April 25, 2021.

In the elections of April 25, 2021, 27 political parties and 5 independent candidates participated, who also have the obligation to submit a financial self-declaration report to the CEC, according to the relevant legal provisions.

In the elections of April 25, 2021, 27 political parties and 5 independent candidates participated, who also have the obligation to submit a financial self-declaration report to the CEC, according to the relevant legal provisions.

Due to the situation created by the Covid 19 pandemic, the CEC extended the deadline for submission of these reports by 10 days, setting September 23, 2021 as the deadline.

The National Development Movement Party and the Nisma Thurje Party did not submit the report within the legal deadlines. Regarding the LZHK, the report was submitted on October 11, 2021, <sup>538</sup>. The lack of a report, also due to the inactivity of the NTH Party on the one hand and the CEC administration on the other, has led to the official reference by the CEC that the NTH Party had not submitted a self-declaration report. Even in the situation of its delivery later, we are still in the conditions of delivery outside the legal deadline, for which administrative sanctions are expressly provided<sup>539</sup>.

The CEC administration performs the preliminary (prima facie) control of the financial report for the election campaign and, as the case may be, notifies the subjects for the correction of the observed irregularities.

In fulfillment of this obligation, it is noticed that the publication on the official website of the CEC<sup>540</sup>, was within the set time limits.

The formats of financial reports of electoral subjects, approved by the Regulatory Commission with the aforementioned decision, are observed to have minimalist changes compared to the formats approved by the CEC in 2017.

In these conditions, taking into account the occasional trainings conducted by the CEC regarding financial reporting, the awareness of electoral subjects on the mechanism and their detailed information on the preparation of the report according to the required legal form and content, should not hve been problematic.

<sup>&</sup>lt;sup>536</sup> Electoral Code of the Republic of Albania, Article 92/3 point 2.

<sup>538</sup> According to the communication with the CEC, after the first submission, the report for completion was returned to NTH, and the party did not submit the completed report. Meanwhile, after the audit, it was concluded that the party sent the report via e-mail, which was not received by the CEC administration.

<sup>539</sup> Decision no. 18 dated 14.04.2021 "...Failure to submit a financial report for the campaign within the legal deadline is punishable by a fine of 2,000,000 ALL."

Decision no. 13, dated 06.04.2021, Regulatory Commission, Article 4 point 4.

The object of the preliminary control of the financial report for the election campaign is only the verification of the elements of the legal form if they are according to the model approved by the CEC.

It is noted that 4 political parties<sup>541</sup> have submitted reports that are not in the format approved by the CEC, a violation for which the legal framework<sup>542</sup> provides an administrative sanction.

Also, despite the fact that the format of reports is published on the CEC website<sup>543</sup> is in pdf, it was given to the electoral subjects and they had the legal obligation to submit the completed report in excel format, except in written form with signature and seal.

It is found that the Reports were submitted only in *pdf* format and often photos, showing the refusal to fulfill the legal obligation. On the other hand, this way of reporting in non-editable formats makes it extremely difficult to read, understand and process the declared data, hindering the normal and simplified development of the verification and control process. Despite this, the CEC has received and published these reports on its website.

KRIIK deems that in order to increase the transparency, accountability of electoral subjects, as well as the disclosure of data included in financial reports, these reports should be published in easily readable and editable formats.

The formats should also be programmed in such a way that every detail field or cell is mandatory to be completed, promoting in advance the accountability of political parties to the legal obligation to correctly detail the revenues and expenditures incurred by them.

From the total of 32 electoral subjects that have submitted a financial report, it is noticed that 11<sup>544</sup> of them have submitted a financial report or a simple document where zero income and expenses are declared.

While the law stipulates that financial income must include all income, even in kind <sup>545</sup>, as well as any expenses incurred, directly or indirectly, by parties or candidates, including personal expenses when they are in function of the election campaign, the declaration by competing electoral subjects that they have zero financial activity, raises serious questions about the veracity of these statements or even the purpose and entering the election race.

A political party together with its candidates that enters the election race and does not carry out any electoral activity, questions the way it and its candidates for MP have presented the electoral offer and have made political commitments in front of the citizens from whom are expected to be voted on. Such a situation, in essence, undermines the purpose of the existence of a political party and its participation in an electoral race.

<sup>&</sup>lt;sup>541</sup> National Conservative Party Albania, Balli Kombëtar Party, Balli Kombëtar Democratic Party and the People's Union of Albanian Pensioners Party.

<sup>&</sup>lt;sup>542</sup> <u>Decision no. 18 dated 14.04.2021</u> " ... Submission of reports in violation of standardized rules and formats approved by the CEC is punishable by a fine of 500,000 to 1,000,000 ALL."

<sup>&</sup>lt;sup>543</sup> Electoral subjects reports for the 2021 election campaign.

<sup>&</sup>lt;sup>544</sup> Declared zero income and expenses: National Conservative Party Albania, Balli Kombëtar Party, Balli Kombëtar Demokrat Party, People's Union of Albanian Pensioners Party, Ora e Shqiptare Party, Liberal Democratic Union Party, Albanian Democratic Union Party, Albanian Democratic Union Party, Albanian Democratic Movement Party, Albanian Democratic Movement Party.

<sup>&</sup>lt;sup>545</sup> When subjects receive a service or material goods as a gift in function of their election campaign without paying it.

### VIII.3.1.1. Asset and liability balances

Electoral Code<sup>546</sup>, provides for the obligation of electoral subjects, in addition to submitting the financial self-declaration report according to the format approved by the CEC, to deposit the balance of their assets and liabilities for the period from the decree of the election date to the election date, ie for the period 06.09. 2020 - 25.04.2021.

This provision of the Electoral Code makes it possible to clarify the financial situation of the political party on September 6, 2020, ie assets, actual financial situation and liabilities, at the beginning of the period when the party will report to the CEC through the self-declaration report, and the situation of the political party on April 25, 2021, ie again the assets, the actual financial situation and the liabilities, at the end of the reporting period.

Fulfillment of these legal obligations, as well as accurate reporting in accordance with accounting standards, makes it possible to provide a clearer picture of the financial activity of the electoral subject, ensuring fuller transparency and making the control mechanism functional through verification of the CEC and statutory auditors.

From the official communication of KRIIK with the Central Election Commission, it is confirmed that there are only 10 political parties<sup>547</sup>, from 27 participants in the elections, who have submitted this balance sheet, in what can be called such, to the CEC but also those after the legal deadline.

The documents submitted for the fulfillment of the above legal obligation were submitted to the CEC in November 2021. Even though the law does not set explicit deadlines regarding this obligation, the balance of assets and liabilities should have been submitted to the CEC together with the self-declaration report of the election campaign.

Also, the report in question should be part of the work of statutory auditors, to have a complete overview of the situation and financial statements of electoral subjects, at the beginning and end of the reporting period, which in fact could not be done possible, as they were submitted late by political parties.

On the other hand, the content of the so-called balance sheets of assets and liabilities, submitted by political parties do not meet the necessary legal criteria that such a balance sheet must have.

They are mostly documents that somewhere refer to some assets or equipment that the party has, somewhere what assets have been added for 6 months, and somewhere is a statement where it is clarified that the party has fulfilled the obligations of submitting the self-declaration report to the CEC.

Referring to all the above, this obligation of the political parties turned out to be not only unfulfilled by them, but what is more disturbing from the reading of the submitted documents, created a practice of bypassing and mocking the binding norm of the Electoral Code.

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<sup>&</sup>lt;sup>546</sup> Electoral Code of the Republic of Albania, Article 92/3 point 2.

<sup>&</sup>lt;sup>547</sup> Have submitted the balance of assets and liabilities to the CEC: Socialist Party, Justice Party, Integration and Unity, New Movement Party, New Democratic Spirit Party, Republican Party, Democratic Union Party, Union for Human Rights Party, Legality Movement Party, Christian Democratic Party, Social Democratic Party

All this behavior, in the judgment of KRIIK, is a totally unserious and irresponsible approach of theirs in relation to this major challenge, especially by the main parties which were promoters, supporters and approvers of the recent legal changes in response to international demands and pressure. and domestic to ensure transparency and control over campaign finance and political parties.

## VIII.3.1.2. Problems related to the content of self - declaration reports

### VIII.3.1.2.1. The party financier was also a candidate for MP

Decision of the Regulatory Commission<sup>548</sup> stipulates that the party financier must not be a candidate to be elected.

Despite this obligation, it is noticed that the financier of some electoral subjects was also a candidate<sup>549</sup> of that electoral subject.

Even though the above decision obliges the parties to replace the financier in case of his / her inclusion in the multi-name list of candidates, considering this commitment incompatible with the task of financier, none of these political parties performed their replacement, even the self-declaration reports submitted to the CEC were re-signed by them.

#### VIII.3.1.2.2. Publication on the party website

The decision of the Regulatory Commission sets out<sup>550</sup> the obligation of electoral subjects to publish on the official website a copy of the self-declaration report for the election campaign.

Some parties do not have an official website. Meanwhile from other parties that have such a site, the Socialist Party<sup>551</sup> has published only the summary table of revenues and expenditures, but not the Full Report as required by law, while all other electoral entities have not fulfilled this legal obligation.

This forecast is a novelty in the regulatory framework to increase transparency by political parties. In this context, the CEC should apply binding mechanisms, even through sanctions, to force the entities to publish the relevant financial reports, despite the delay and the administrative sanction that may be applied to them.

<sup>&</sup>lt;sup>548</sup> Decision no. 13, dated 06.04.2021, Regulatory Commission, Article 7 point 2.

<sup>549 -</sup> Democratic Conviction Party, financier Mr. Elon Ciko is also a candidate with serial number 24 in Tirana Region; - Albanian Emigration Party, financier Mrs. Enkeleda Latifi is also a candidate of the ABEOK Coalition where this party belongs, with ordinal number 2 in Elbasan Region; - Albanian Emigration Party, financier Mr. Rozher Prifti is also the candidate of the ABEOK Coalition where this party belongs, with serial number 4 in Korça Region; - Albanian Democratic Movement Party, financier Mrs. Marcela Lala is also a candidate with serial number 2 in Fier Region; - New Movement Party, financier Mr. Arsen Lazri is also a candidate with serial number 5 in Durrës Region; - Partia Nisma Thurje, financier z. Panajot Soko is also a candidate with serial number 1 in Tirana Region.

<sup>&</sup>lt;sup>550</sup> Decision no. 13, dated 06.04.2021, Regulatory Commission, Article 3 point 4.

<sup>&</sup>lt;sup>551</sup> Socialist Party <u>has published</u> on the official website only the financial summary of total revenues and expenditures from the entire Financial Self-Declaration Report for the election campaign.

# VIII.3.1.2.3. Incomplete reports

The financial reports of the electoral subjects should be completed with a computer, as well as in each field of their content with the necessary data, in order to create a clearer picture of the entire financial situation of the electoral subject during the campaign.

In almost no self-declaration report, the completion has been made in all its parts, provided to be completed according to the respective format.

The Social Democratic Party has submitted a report which contains only the amount received from this party from the state budget, and no other data. Even this part is handwritten.

The report of the Hour of Albania Party has also been completed in handwriting.

The Democratic Party, the New Democratic Spirit Party, and the independent candidate Iljaz Shehu in their report did not specify the description of the donation in kind.

Some reports lack different data in different areas of the reports, which are in the section of income, but also of expenses<sup>552</sup>.

# VIII.3.1.2.4. Donations of more than 50 thousand ALL made in cash

Electoral Code<sup>553</sup> stipulates that the donation of non-public funds with a value greater than 50 thousand ALL must be made only through bank transfer to a special account opened by the entity or candidate.

Some subjects<sup>554</sup> have declared in their report's donations of monetary values greater than 50 thousand ALL made in cash.

The report of the Socialist Movement for Integration Party lacks the identification numbers of some individuals who have made donations in kind. The report of the Socialist Party lacks the date when the income from the membership fees and transfers from other accounts of the entity were deposited in the campaign bank account; the non-public cash financing section lacks the date of the donation, and the address of the donor. In the report of the Democratic Party in some cases the number of identifications of donor individuals in the section of in-kind donations is missing; the date when the income from the membership fees and the transfers from other accounts of the subject are deposited in the bank account of the campaign; Facebook expenses are summarized in a single statement, not separated by each invoice and the date the expense was incurred. The report of the Republican Party lacks an explanation of the expenses. The Movement for Change Party report lacks the method of making the payment for the bills in the expenditure section. In the Democratic Conviction Party report the expenditure section is not detailed; the donation date and address of the donor are missing in the revenue section.

<sup>&</sup>lt;sup>553</sup> Electoral Code of the Republic of Albania, Article 92/2 point 2.

<sup>&</sup>lt;sup>554</sup> - The Democratic Conviction Party has declared 8 donors with amounts of 100,000 ALL each made in cash. - The Movement for Change Party has declared 4 donors with amounts respectively of 75,000 ALL each made in cash. -Z. DP-AN candidate Agron Duka in his report as a candidate of the Agrarian Environmentalist Party has donated 100,000 ALL cash. - The candidate proposed by the voters, Mr. Pal Shkambi, has received a cash donation through international money transfer companies in the amount of 102,000 ALL.

According to the Decision of the Regulatory Commission <sup>555</sup> this action is not only sanctioned with a fine equal to the amount donated, but also the funds received from the entity must be transferred to the account of the CEC.

## VIII.3.1.2.5. Reports where the expenditure category does not match its description

The categorization of expenditures in the self-declaration reports is done according to the items in the category of which each expenditure is entered, which must be described in the respective column.

It is noted that the Democratic Party for most expenditures has not set a description, but only the item of expenditure.

Meanwhile the Socialist Party <sup>556</sup> and the Socialist Movement for Integration<sup>557</sup> have some discrepancies between the item of expenditure and its description.

Apart from the cases when the discrepancy is obvious, there are also cases when the connection between the item and the description remains debatable.

In order to minimize the subjectivity in the categorization of expenditures, it is necessary to create a closed selection list for the respective description in the reporting formats, in function of each item that is predefined and can be selected by the entity.

# VIII.3.1.2.6. Declaration of expenses

The expenditure section of the standard form consists of two parts. The first part provides for the reporting of expenditures based on the invoice, which provides a detailed overview of all campaign expenditures incurred by the electoral subject.

Also, in addition to detailing them in terms of the type, cost and data of the respective invoices, each entity should fill in the columns with more detailed descriptions in the case of expenses for rallies, media, or various promotions.

Apart from PDIU, no other entity has completed this part, leaving it blank or even removing (deleting) it from the expenditure section.

<sup>555 &</sup>lt;u>Decision no. 18 dated 14.04.2021</u> "... Acceptance of private funds in the amount of more than 50 thousand ALL, through other forms, other than the transfer to the bank account, is punished with a fine equal to the amount donated and in the transfer of funds received on CEC account".

<sup>&</sup>lt;sup>556</sup> In the item rallies and gatherings are included expenses for "electoral office rent", in the item electoral office expenses are included expenses for transport or even fuel, etc.

<sup>&</sup>lt;sup>557</sup> In the item expenses for electoral office are included expenses for "commissions", for car maintenance, in the item expenses for rallies and activities are included expenses for "electoral office clothes", etc.

### VIII.3.1.2.7. Payments over 150,000 ALL made in cash

The tax legislation<sup>558</sup> in the Republic of Albania stipulates that payments against services can be made in cash if they are up to 150,000 ALL. For larger values, payments must be made through the bank. It is noticed that the Socialist Party has made cash payments of bills in amounts outside this legal limit <sup>559</sup>

Also, one party has stated<sup>560</sup> payment of an invoice with a value higher than the allowed limit without specifying the method of payment.

## VIII.3.1.2.8. Expenditures incurred after the end of the electoral campaign

The campaign expenditure section includes any expenditure incurred for campaign purposes regardless of the date on which it was incurred, but always before the election date. While the liquidation of the invoice or the final installments can be done even after the election date.

In the reports of the six parties<sup>561</sup> are declared expenses with the date of the bill in the months of May, June or July 2021, ie outside the period of the election campaign.

Apart from the fact that we are dealing with expenses that have been incurred outside the election campaign period, inaccuracies are also evidenced by the entities that issued these invoices, as they declare spending in function of an electoral activity, after the election date. This is contrary to applicable tax legislation<sup>562</sup>, according to which the invoice is compiled and issued by the provider or seller at the moment of performing the service, regardless of the moment when its liquidation is performed.

## VIII.3.2. Self-report of candidates

Independent or nominated candidates by political parties or coalitions carry the same obligations or constraints in terms of funding as the electoral entities themselves proposing them.

The financial activity of the candidates should be under the supervision of the party financier. Candidates' income and expenses are calculated as income and expenses from the respective party and should be included in the party's election campaign financial report.

<sup>&</sup>lt;sup>558</sup> Instruction No.24 dated 02.09.2008 "For tax procedures in the Republic of Albania" of the Minister of Finance, amended by Instruction no. 4, dated 25.01.2014, published in the Official Gazette no. 6 dated 30 January 2014, point 59.1.1 "Pursuant to point 1 of article 59 of the Law, taxable persons cannot carry out sale and purchase transactions with ALL in hand, when the value of each transaction is greater than 150 thousand ALL. Carrying out ALL with cash and not through the transfer from the liquidator account of the buyer to the liquidator account of the seller of sales transactions exceeding the value of ALL 150 thousand, constitutes a violation for both the seller and the buyer and is punishable under Article 120 of the Law with a fine of up to 10 percent of the value of each transaction performed with ALL in hand."

<sup>&</sup>lt;sup>559</sup> SP has paid cash an invoice of 311,654 ALL as well as an invoice of 150,000 lek.

<sup>&</sup>lt;sup>560</sup> Movement for Change Party, invoices worth 515.425 ALL.

<sup>&</sup>lt;sup>561</sup> Socialist Party, Democratic Party, Socialist Movement for Integration Party, Union Party for Human Rights, Justice, Integration and Unity Party, New Democratic Spirit Party.

<sup>&</sup>lt;sup>562</sup> Instruction No.24 dated 02.09.2008 "On tax procedures in the Republic of Albania" of the Minister of Finance, amended by Instruction no. 4, dated 25.01.2014, published in the Official Gazette no. 6 dated 30 January 2014, point 51.1 "The seller issues a tax invoice and the buyer must request it at the time of the sale or performance of work or service."

Candidates included in the multi-name lists of political parties have the obligation to record, document and report their campaign income and expenses using a standard reporting form approved by the CEC Regulatory Commission.

Copies of the candidates' reports must be attached to the political party's financial report.

Only 8 parties<sup>563</sup> have submitted to the CEC, together with the party report, the reports of their candidates.

One party<sup>564</sup> has included in its report only the total amount received and spent by the candidates as an aggregate total by each district.

The Democratic Party has included the aggregate amount by district for the candidates of only 5 constituencies, declaring 0 income and expenditures from the candidates of the other 7 constituencies<sup>565</sup>.

Considering the electoral activity of the candidates of this political force in the regions in question, strong questions and doubts are raised about the veracity of this statement.

The decision of the Regulatory Commission stipulates that candidates must maintain constant contact with the party financier regarding the financial activity of their campaign. This means that the party financier is aware of the entire financial activity of each candidate, among other things, to be careful not to exceed the spending limit according to the provisions of the Electoral Code.

From a total of 1,825 candidates<sup>566</sup> 659<sup>567</sup> have submitted a self-declaration report to the CEC through the political entity under whose logo they ran, or as candidates proposed by the voters, while the remaining 1,166 candidates have not fulfilled this legal obligation<sup>568</sup>.

It turns out that 483 candidates, out of 654 who have submitted their reports to the CEC, attached to the report of the respective party, declare zero income and expenses<sup>569</sup> throughout the entire electoral activity conducted by them.

According to the statements of the political parties, the total amount benefited by the candidates is 50,193,107 ALL and that spent 45,957,347 ALL.

The total amount of income of the candidates, according to the self-declaration reports of the candidates who have submitted a report is 49,306,723 lek, while that spent 44,237,559 lek.

<sup>&</sup>lt;sup>563</sup> Socialist Movement for Integration Party, Republican Party, Agrarian Environmentalist Party, Movement for Change Party, New Movement Party, Christian Democratic Party, Democratic Party, Socialist Party.

<sup>&</sup>lt;sup>564</sup> Justice, Integration and Unity Party.

<sup>&</sup>lt;sup>565</sup> Berat Region, Dibër Region, Durrës Region, Fier Region, Kukës Region, Lezhë Region, Vlora Region.

<sup>&</sup>lt;sup>566</sup> The total number of candidates in the April 25 elections was 1841, but since the leaders of several parties applied for the right to run in more than one district, the number of individual candidates who must submit a self-declaration report is 1825, of which 5 candidates independent. (For more on the number of candidates see the section "Registration of candidates")

<sup>&</sup>lt;sup>567</sup> Of whom 654 candidates from political parties or electoral coalitions and 5 independent candidates.

<sup>&</sup>lt;sup>568</sup> For more see Annex S "Candidates who have not submitted a self-declaration report".

<sup>&</sup>lt;sup>569</sup> For more see Annex Q "Candidates who have submitted a self-declaration report with 0 income and expenses".

Regarding expenses, it is noticed that they are mainly: for the production of promotional materials 28%, social media 19%, transportation expenses 18%, election office 8%, rally expenses 8%, administrative expenses 7%, media 4% and the rest for other expenses such as surveys, outdoor advertising, publications, etc.

### VIII.3.2.1. Expenses of candidates

Like political parties, candidates should consider any campaign-related expenditure as an expense of the campaign, regardless of when it was made.

Expenditures are divided into separate categories. The expenditure section in the self-declaration report provides for the division of expenditures according to the respective invoices, and the detailing of each invoice according to the respective fields and descriptions. Completing each field provides a clear picture of the expenses incurred by the candidate in function of the election campaign.

Expenditures must be justified with the necessary tax documentation, according to applicable law.

It is noticed that in the reports of the candidates there are almost the same problems as the political parties.

Thus, despite the legal definition for issuing a tax invoice at the time of performing a certain service, there are 35 candidates<sup>570</sup> who declare in the relevant report's invoices for the months of May, June or July, after the end of the election campaign.

<sup>&</sup>lt;sup>570</sup> \* Socialist Party

<sup>-</sup> Ogerta Manastirliu, paid invoice dated 01.07.2021 in the amount of 150,000 ALL; - Pranvera Resulaj, paid invoice dated 12.05.2021 in the amount of 68.860 ALL, and with invoices dated 26.06.2021 and 29.06.2021 respectively in the amounts of 2.100 ALL, 14.630 ALL, 39.360 ALL and 18.900 ALL; - Etilda Gjonaj, paid invoice dated 24.05.2021 in the amount of 266,800 ALL; - Eduart ShaSMI, paid invoice dated 20.06.2021 in the amount of 445,000 ALL; - Plarent Ndreca, paid invoice dated 24.05.2021 in the amount of 340,000 ALL; - Eduard Ndreca, the donations he made to himself are on 30.04.2021, 31.05.2021 and 02.06.2021, paid invoices dated 30.04.2021 worth 74.100 ALL, 31.05.2021 worth 120.000 ALL and 02.06.2021 worth 58,000 ALL; - Bledi Como, paid two invoices dated 29.05.2021 with the values of 14.000 ALL and 101.591 ALL; - Bledar Çuçi, paid invoice dated 14.05.2021 in the amount of 1,310,160 ALL and 17.05.2021 in the amount of 292,850 ALL; - Taulant Balla, paid invoice dated 12.05.2021 in the amount of 258,000 ALL.

<sup>\*</sup> Agrarian Environmentalist Party

<sup>-</sup> Agron Duka, in-kind donation invoice worth 50,000 ALL was issued on 30.07.2021.

<sup>\*</sup> Socialist Movement for Integration

<sup>-</sup> Luljeta Skura, paid invoices dated 05.05.2021 worth 70.000 ALL, 08.05.2021 worth 15.000 ALL; - Merita Hoxha, paid two invoices dated 05.05.2021 worth 35,000 ALL and 35,000 ALL; - Monika Kryemadhi, paid invoices dated 01.05.2021 in the amount of 100,000 ALL and 10.05.2021 in the amount of 19.928 ALL; - Arben Cuco, paid invoices dated 04.05.2021 in the amount of 30,000 ALL; - Christian China, paid invoice dated 13.05.2021 worth 10,000 ALL; - Endrit Braimllari, paid invoices dated 22.05.2021 in the amount of 90,000 ALL; - Agron Cela, paid three invoices dated 19.05.2021 respectively worth 150,000 ALL and the other two worth 140,000 ALL; - Bledar Monaj, paid an invoice dated 02.06.2021 in the amount of 51,200 ALL; - Liri Dema, has paid two invoices dated 05.05.2021 worth 32,500 ALL and 27,600 ALL, and one invoice dated 10.05.2021 worth 10,000 ALL; - Anxhela Shenaj, paid two invoices dated 05.05.2021 worth both 6,500 ALL, and one invoice dated 17.05.2021 worth 24,000 ALL and one invoice dated 18.05.2021 worth 24,000 ALL; - Dikens Bushaj, paid two invoices dated 19.05.2021 worth 25,000 ALL and worth 27,600 ALL; - Griselda Myslymi, paid an invoice dated 10.05.2021 with a value of 10,000 ALL and three invoices dated 18.05.2021 with the values of 15.600 ALL, 50.000 ALL and 10.500 ALL; - Silvana Caka, paid an invoice dated 08.06.2021 worth 15,000 ALL; - Besnik Jakaj, paid an invoice dated 25.05.2021 in the amount of 25,500 ALL; - Vojo Bregu, paid an invoice dated 12.05.2021 worth 200,000 ALL; - Arben Rroko, paid an invoice dated 05.05.2021 worth 43.200 ALL and an invoice dated 12.05.2021 worth

Referring to the tax legislation, even the candidates cannot pay amounts greater than 150,000 ALL cash, but only through bank transfer.

From the reporting of candidates, it is noticed that 6 candidates<sup>571</sup> the Socialist Party have made such payments in *cash*.

## VIII.3.2.2. Incomplete and deficient reports

Candidate reporting should be in close cooperation and coordination with the political party financier. In these conditions, the reports of the candidates would have to pass the control filter by the political party in addition to the one at the CEC.

It is noticed that there is a truncated completion and publication of candidate reports. Thus the Socialist Party candidates who have submitted a report with 0 income and expenses, have not published a full report, but only its front page.

Even in cases where the candidates have financial activity, the completion of the necessary data in the report format is truncated<sup>572</sup>.

<sup>43.000</sup> ALL; - Floida Kerpaci, paid an invoice dated 31.05.2021 worth 60,000 ALL; - Edmond Ndou, paid two invoices dated 20.05.2021 respectively worth 150,000 ALL and 140,000 ALL; - Linda Reçi, paid two invoices dated 19.05.2021, respectively in the amount of 140,000 ALL and 120,000 ALL; - Ilir Hyseni, paid two invoices dated 19.05.2021, respectively in the amount of 110,000 ALL and 120,000 ALL; - Somela Radohima, paid an invoice dated 19.05.2021 worth 150,000 ALL; - Klajda Gjosha, has an invoice dated 06.05.2021 worth 35,000 ALL and an invoice dated 12.05.2021 worth 90,000 ALL; - Joana Ruçi, paid an invoice dated 04.06.2021 worth 60,000 ALL; - Everton Shehu, paid an invoice dated 25.05.2021 worth 47,000 ALL; - Arben Rroko, paid an invoice dated 05.05.2021 worth 43.200 ALL and an invoice dated 12.05.2021 worth 43.000 ALL.

<sup>&</sup>lt;sup>571</sup> - Lavdim Krasniqi, paid in cash the bill worth 390,000 ALL; - Xhemal Qefalija, paid cash invoice 198,500 ALL; - Ylli Shehu, paid in cash two invoices worth 202,000 ALL and 468,000 ALL; - Halim Dauti, paid cash invoice 267,917 ALL; - Bledar Çuçi, paid cash invoice 292,850 ALL; - Antoneta Dhima, paid cash invoice 170,000 ALL.

<sup>572</sup> \* Socialist Party

<sup>-</sup> Pranvera Resulaj did not complete the in-kind donations section with the respective names; - Teuta Ramaj has handwritten in the report only the amount received from her as non-public financing, but has not completed the other details of the non-public financing section; - Etilda Gjonaj did not complete the non-public financing section in the report, but only the relevant amount received; - Ermonela Felaj in the expenditure section has placed only the amounts without specifying anything else needed in the relevant table of the section; - Dallandyshe Bici did not complete the in-kind donations section with a description of this donation; - Klodeta Dibra in the expenditure section has deficiencies in invoice numbers and dates; - Ornaldo Rakipi, the expenditure table has only a few amounts under the item administrative expenditures without any explanation; - Edona Bilali in the relevant report has specified only the amount of income and expenses on the first page, but without completing its other sections; - Eduard Ndreca in the expenditure section did not specify the expenditure category; - Bledi Como has submitted a completed handwritten report; - Bardhyl Kollcaku has included in the report only the income, but not the expenses incurred by him; - Fadil Nasufi the amount of 50,000 ALL reflected on the first page as an indirect expense is not in the relevant section of in-kind donations in the report; - Dionis Imeraj has some inaccuracies in filling in the sections of expenditures and in-kind donations having a duplicate reflection of the figures on the first page of the report; - Kabir Fishta quotes on the first page of his report 50,000 ALL income from legal entities, but did not complete the other sections of the report.

<sup>\*</sup> Democratic Party

#### VIII.4. Control

The legal framework defines two basic mechanisms by which the finances of electoral subjects are controlled: monitoring throughout the election campaign and the statutory audit, which is performed by statutory auditors contracted by the CEC.

The monitors during the election campaign, in a step back from the previous elections, are not expected to carry out costing of the activities of the political parties in the campaign, but to monitor the compliance of the activities with the obligations under the Electoral Code and / or bylaws issued in its implementation.

Updating the rules, referring to the legal changes of 2020, for the completion, filing, control and verification of financial reports submitted by electoral subjects to the CEC, the model of the audit report of funds received from electoral subjects by auditors appointed by the CEC, deadlines for publication of these reports, role and responsibilities of political party financiers, was carried out through the Decision<sup>573</sup> no. 13 approved by the Regulatory Commission.

### VIII.4.1. Monitoring the election campaign

The monitoring is carried out in the name and on behalf of the Central Election Commission and aims to assess the degree of compliance of the activity of political parties, electoral subjects and their candidates with the conditions and requirements of the Electoral Code and other bylaws.

In contrast to 2017 and 2019, campaign activity monitors were no longer financial auditors and were not intended to incur independent campaign costs, but only to monitor activities, including the activities of state institutions.

This control mechanism is important during the pre-election period, in order to increase transparency for voters, while the findings of monitors will also serve as additional information to record the accuracy of reporting campaign expenditures by the electoral subjects themselves.

The CEC approved the instruction<sup>574</sup> for the selection criteria, the procedure and appointment of monitors, the object of monitoring, the monitoring period, the determination of the monitoring subject / s, the geographical area where the monitoring is located, as well as the independent, impartial, and transparent monitoring reporting.

In the report of the candidate Fatmir Mediu are only the expenses incurred, but the revenue section is unfilled.

<sup>-</sup> Edmond Spaho, in the section of cash and in-kind donations, any donor identification data is missing. There are also names of in-kind donors and the relevant description, but without the equivalent of cash donation; - Entela Shehaj, in her report did not complete the revenue section, but only attached a statement for donation made by her.

<sup>\*</sup> Republican Party

<sup>&</sup>lt;sup>573</sup> <u>Decision no. 13, dated 06.04.2021</u>, Regulatory Commission "On determining the rules for financial reporting of electoral subjects, control and verification of their funding and expenditures during the election campaign."

<u>574 Instruction No. 1 dated 2.02.2021</u>, "To set criteria for the selection of monitors, procedure, appointment and object of monitoring".

Each monitor signed the approved form<sup>575</sup> by the Commissioner, for the absence of conflict of interest and self-declaration of judicial status.

The CEC appointed 64 monitoring experts <sup>576</sup> in 12 regions of the country.

Monitors had to submit interim reports to the CEC every ten days<sup>577</sup>, as well as to report immediately the observed irregularities.

The CEC has the obligation to publish the reports of the monitors on its website, within two working days from their submission to the  $CEC^{578}$ .

This obligation was not fully realized by the CEC. As of election day, only 63 monitoring reports were published on the CEC website, covering the entire period from 1 to 15 March 2021.

From the examination of the interim reports, before the election day, it was evident that 6 municipalities<sup>579</sup> and 5 electoral subjects<sup>580</sup> were not monitored for that period, as they were not included in any of the monitoring reports.

Also, in the entirety of all interim reports published, the monitors identified two problems that constitute violations of the law<sup>581</sup>.

Currently, a total of 303 interim reports from 64 monitors<sup>582</sup> have been published on the CEC website.

Regarding the final monitoring reports, there are three municipalities<sup>583</sup> not included in any of the reports.

Also, it is noticed that only the three main entities PS, DP and SMI are monitored in each district while the others in very few of them<sup>584</sup>.

<sup>&</sup>lt;sup>575</sup> Instruction No. 89, dated 05.02.2021, State Election Commissioner, "On the approval of standard self-declaration forms for monitors".

<sup>&</sup>lt;sup>576</sup> List of monitors selected for 12 constituencies, State Election Commissioner

<sup>&</sup>lt;sup>577</sup> Each monitor referring to the engagement period had to submit a total of five interim reports and a final report.

<sup>&</sup>lt;sup>578</sup> <u>Decision no. 13, dated 16.04.2021</u>, Regulatory Commission, "On determining the rules for financial reporting of electoral subjects, control and verification of their funding and expenditures during the election campaign", Article 2 "Monitoring reports" point 2.

<sup>&</sup>lt;sup>579</sup> Përmet Municipality, Saranda Municipality, Selenica Municipality, Shijak Municipality, Himara Municipality, Librazhd Municipality, Fushë-Arrëz Municipality.

<sup>&</sup>lt;sup>580</sup> Movement for Change Party, Albanian Democratic Movement Party, Democratic Conviction Party, New Democracy Alliance Party, Balli Kombëtar Party.

<sup>&</sup>lt;sup>581</sup> A.S Monitoring report: In the Municipality of Durrës, the Democratic Party and the Socialist Movement for Integration Party have opened more than one election office per neighborhood.

N.D. Monitoring report: The Socialist Movement for Integration Party did not include in the propaganda materials of the campaign the expression "produced under the legal responsibility of ....."

<sup>&</sup>lt;sup>582</sup> Missing: - third interim report of monitor I.E; - Fourth interim report of monitor G.N; - The fourth and fifth interim report of the A.S monitor; - The first, second, third and fourth interim report of the monitor S.GJ; - Third and fourth interim report of monitor I.B; - Fourth interim report of monitor B.G; - The second and third interim report of the monitor A.N; - The first, second, third and fifth interim report of the monitor I.S.

<sup>&</sup>lt;sup>583</sup> Librazhd Municipality, Prrenjas Municipality and Himara Municipality.

<sup>&</sup>lt;sup>584</sup> Berat region, three electoral subjects were monitored (DP, SP, SMI); Dibër Region, three electoral subjects were monitored (DP, SP, SMI); Durrës Region, three electoral subjects were monitored (DP, SP, SMI); Elbasan region, five electoral subjects were monitored (DP, SP, SMI, BD, NTH); Fier region, five electoral subjects were monitored (DP, SP, SMI, BD, PDIU); Gjirokastra Region, six electoral subjects were monitored (SMI, SP, DP, NTH, VV, PSD); Korça Region, five electoral subjects were monitored (SP, DP, SMI, PSD, PDIU); Kukës Region monitored five electoral

59 final monitoring reports have been published on the official website of the CEC<sup>585</sup>, while the final reports of the three monitors are missing<sup>586</sup>.

It should be noted that even in this process there were cases of submission of problematic reports by financial monitors.

Evidence from the review of monitoring reports is cases of reports, which are incomplete, by filling in the relevant fields only through the phrase "There is not"<sup>587</sup>, reports in which a total number of election offices are recorded by the monitor, but without specifying which subject they belong to<sup>588</sup>, or even reports completed in handwriting<sup>589</sup>.

In a general view, there is a low level of preparation and commitment on the part of the monitors, with the presentation of reports without essential data, without the necessary descriptions of violations<sup>590</sup>, in formats that are very difficult to read and process, as well as with large grammatical errors which make it difficult to understand the issues addressed.

This situation, at best, shows the lack of accountability on the part of the monitors and on the other hand the lack of control by the CEC over these reports.

The monitors have identified some problems related to the activity of electoral subjects.

Specifically, there have been cases of electoral activities in schools<sup>591</sup> or public institutions and involvement of public administration in the election campaign during working hours<sup>592</sup> in violation of the provisions of Articles 91 and 92 of the Electoral Code.

subjects (DP, SP, SMI, PR, BD); Lezha Region, three electoral subjects were monitored (DP, SP, SMI); Shkodra Region, six electoral subjects were monitored (SP, DP, SMI, PSD, NTH, LN, BD); Six electoral subjects were monitored in Vlora Region (SP, DP, SMI, BD, LRE, PSD, PDIU); Tirana Region, six electoral subjects were monitored (SP, DP, SMI, PSD, ADR, PDIU)

<sup>&</sup>lt;sup>585</sup> At first glance there are 61 reports, but in the link where it should be <u>Final monitoring report of the monitor N.D.</u>, is <u>Final monitoring report of the monitor I.LL.</u>; as well as in the link where it should be <u>Final monitoring report of A.P.</u>, is Final monitoring report of G.A..

<sup>&</sup>lt;sup>586</sup> Missing Final Report of monitor I.S; Final report of monitor R.H; Final report of monitor J.L.

<sup>&</sup>lt;sup>587</sup> Final monitoring report of Monitor R.O.; Final monitoring report of Monitor G.A..

<sup>&</sup>lt;sup>588</sup> Final monitoring report of Monitor SH.C.; Final monitoring report of Monitor G.K.; Final monitoring report of Monitor B.K..

<sup>&</sup>lt;sup>589</sup> Final monitoring report of <u>Monitor SH.C.</u>; Final monitoring report of <u>Monitor E.P.</u>, Final monitoring report of <u>Monitor O.C.</u>, Final monitoring report of <u>Monitor G.K.</u>.

Monitor A.M. mentions cases in the report where electoral subjects or candidates give money, material goods, other benefits, to gain their support in elections, but does not make any further explanation regarding this fact. Monitor R.G. has identified in the report cases of electoral activities in public institutions, but has quoted only the dates without fulfilling information to the specific case.

<sup>&</sup>lt;sup>591</sup> Monitor G.SH. and Monitor R.G. in monitoring reports highlight this problem, but are unclear in the relevant descriptions.

<sup>&</sup>lt;sup>592</sup> Monitor R.G., The Municipality of Gjirokastra, declares for the subject SP: ".... During the meeting of the Prime Minister Edi Rama in the tourist point of Viro Park on Thursday at 15.00, it is clear that most of the guests in that meeting are of public administration in official working hours. During the meeting of the Prime Minister Edi Rama in the stadium on 17.04.2021, at 15.00, it is clear that most of the guests in that meeting are of public administration and especially teachers of all cycles ".

Monitor R.N., Municipality of Tropoja, for the subject SP: "... On 30.03.2021 the mayor of Tropoja, Mr. Rexhë Byberi, Deputy. Chairman Abedin Kerrnaja, and Kujtim Rexha, civil servant Agron Cakraj, Director of Tropoja Kongres Imeraj Hospital, Deputy Prefect Muj Gusturani, Head of Tropoja Tropoja Altin Berbati, Employee of Fierzë Hydropower Plant

Cases have been reported by monitors of the opening of more than one electoral office in the neighborhood<sup>593</sup> or electoral offices set up less than 300 meters from the polling station, CEAZ or BCC <sup>594</sup> in violation of Instruction no. 6 dated 23.03.2021 of the State Election Commissioner.

Also were monitored posters of propaganda materials on facades or public spaces not defined in the mayor's decision<sup>595</sup>; posting of propaganda materials at a distance of more than 5 meters from the election office<sup>596</sup>; as well as the presence of propaganda materials without branding<sup>597</sup> or placing the expression "produced under the legal responsibility of .....", in violation of Article 79 of the Electoral Code.

participated, and Kujtim Hajdarmat election of the SP Mr. Petrit Malaj. This finding was also ascertained in the 2 consecutive meetings of 30.03.2021 organized in the Administrative Unit Bytyc, the villages of Berisha, Pac, Visoc and Radogosh, as well as the Administrative Unit Llugaj, the village of Cerrnic, this was observed by the monitoring of social networks Facebook of the candidate for MP Petrit Malaj. The participation of the above-mentioned persons constitutes a violation due to the job positions that each one holds within the working hours for electoral purposes. In addition to the above, the participation of minors in meetings is also noticed ".

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<sup>&</sup>lt;sup>593</sup> Final monitoring report of Monitor A.N. Shijak Municipality, Subject SP; Final monitoring report of Monitor A.Z. Durrës municipality, subject SP, DP, SMI.

<sup>&</sup>lt;sup>594</sup> Final monitoring report of Monitor S.B., Durrës municipality (Shkozet) three election offices of the three subjects SP, DP, SMI; Final monitoring report of Monitor M.H., Municipality of Peqin, Belsh three election offices of three subjects SP, DP, SMI; Final monitoring report of Monitor G.B., Cërrik Municipality, two election offices of the subject SMI; Final monitoring report of Monitor A.T., Roskovec Municipality, subject SP; Final monitoring report of Monitor R.G., Municipality of Gjirokastra, subjects NTH dhe SP; Final monitoring report of Monitor D.D., Municipality of Korça, two election offices of the subject SP and three election offices DP; Final monitoring report of Monitor A.S., Municipality of Maliq and Pustec, subjects SMI, SP, DP, PSD; Final monitoring report of Monitor A.M., Municipality of Tirana (Municipal Unit no.1) subjects PDIU and DP; Final monitoring report of Monitor L.B., Tirana Municipality (Baldushk, Kashar, Ndroq, Petrelë, Pezë, Vaqar) subject DP; Final monitoring report of Monitor E.X., Municipality of Tirana (Administrative Unit no.2) four election offices of the subject DP and one election office for the subject PDIU; Final monitoring report of Monitor I.B., Municipality of Tirana (Administrative No.6), one election office for the subject PSD, one office for the subject SMI, four election offices for the subject DP, three election offices SP.

<sup>&</sup>lt;sup>595</sup> Final monitoring report of Monitor R.K. Berat Municipality (Çorovodë, Skrapar) Subject DP; Final monitoring report of Monitor R.G. Municipality of Gjirokastër, Subject SP; Final monitoring report of Monitor O.K. Bashkia Pogradec, subjektet SP, DP, SMI and PAA; Final monitoring report of Monitor L.B. Municipality of Tirana (Baldushk, Kashar, Ndroq, Petrelë, Pezë, Vaqarr) Subject DP; Final monitoring report of Monitor J.D. Municipality of Tirana (Administrative unit no.5) subjects SP and DP; Final monitoring report of Monitor I.B. Municipality of Tirana (Administrative Unit no.6), Subject DP.

<sup>&</sup>lt;sup>596</sup> Final monitoring report of <u>Monitor B.T.</u> Municipality of Elbasan Subject SP; Final monitoring report of <u>Monitor A.T.</u> Bashkia Roskovec Subject DP; Final monitoring report of <u>Monitor G.SH.</u> Bashkia Tepelenë, Memaliaj Subject SP; Final monitoring report of <u>Monitor R.G.</u> Municipality of Gjirokastër subjektet DP dhe SP; Final monitoring report of <u>Monitor I.B.</u>, Municipality of Tirana (Njësia nr.5) subjektet SP dhe DP; Final monitoring report of <u>Monitor I.B.</u>, Municipality of Tirana (Njësia nr.6), Subject DP.

<sup>&</sup>lt;sup>597</sup> Final monitoring report of <u>Monitor R.M.</u> Durrës municipality (Lagjja 13), subjektet SP, DP, SMI; Final monitoring report of <u>Monitor B.T.</u> Municipality of Elbasan, subjects BD and NTH; Final monitoring report of <u>Monitor A.P.</u> Mallakastër Municipality, Subject SMI; Final monitoring report of <u>Monitor R.G.</u> Municipality of Gjirokastër, subjects SMI and SP; Final monitoring report of <u>Monitor D.D.</u> Municipality of Korçë, subjects SP, DP and SMI.

# VIII.4.2. Expenditure audit

The selection criteria and procedures, the detailed methodology of the work of statutory auditors, for the audit of funds received from political parties for the calendar year and the election campaign, were approved by the instruction<sup>598</sup> 14 by the State Election Commissioner.

The appointment of auditors of funds received and spent by political parties during the election campaign was carried out by decision no. 426 of the State Election Commissioner<sup>599</sup> after the draw on July 12, 2021<sup>600</sup>. 19 licensed accounting experts, or legal auditors, audited the funds received and spent by 32 electoral entities, including 27 political parties and five independent candidates<sup>601</sup>.

The audit is required and should be performed in accordance with International Standards on Auditing (ISAs), maintaining professional skepticism on the job and then delivering professional judgment at its conclusion.

Nevertheless, there is an inevitable risk that some of the material anomalies will remain undetected, even though the audit is performed in accordance with ISAs.

The work of the accounting experts, contracted as legal election auditors by the CEC, concludes in the submission of the audit report, which has the analytical part and in the end the opinion of the audit.

The analytical part contains quantitative and qualitative data on the audit performed in the relevant entity, while the opinion is the summary of the judgment with specification only of the relevant issues identified during the audit.

From the final judgment of the auditors on the financial activity related to the election campaign, for 14 subjects<sup>602</sup> was concluded in the opinion with reservation, for 17 subjects the audit concluded in the opinion without reservation<sup>603</sup>, while in a subject<sup>604</sup> the audit could not make a judgment because it did not carry out the audit process.

<sup>&</sup>lt;sup>598</sup> Instruction no. 14 dated 09.06.2021 "For "setting criteria, procedures for selection and appointment of licensed accounting experts (legal auditors) and contractual conditions for auditing funds received and spent by political parties during the calendar year and electoral subjects and their candidates in the election campaign".

<sup>&</sup>lt;sup>599</sup> <u>Decision no. 426 dated 12.07.2021</u> "For the announcement of the result of the lottery for the appointment of licensed accounting experts (legal auditors), who will perform the audit of funds received and spent by electoral subjects for the election campaign, for the elections of the Albanian Parliament of April 25, 2021".

<sup>600</sup> Lottery for the selection of licensed accounting experts, dt. 12.07.2021.

<sup>&</sup>lt;sup>601</sup> 13 licensed accounting experts will audit from two electoral subjects and six licensed accounting experts will audit from 1 electoral subject.

<sup>&</sup>lt;sup>602</sup> Legality Movement Party, Justice Integration and Unity Party, Christian Democratic Party of Albania, Balli Kombëtar Demokrat Party, Democratic Party, New Democratic Spirit Party, People's Union of Albanian Pensioners Party, Democratic Conviction Party, Social Democratic Party, Socialist Party, Movement for Development National and independent candidates Iljaz Shehu, Pal Shkambi, Elton Debreshi.

<sup>&</sup>lt;sup>603</sup> The unreserved opinion is the conclusion of the audit when the financial activity of the electoral subject has been in accordance with the National Accounting Standards, ie it has been developed and documented in accordance with the entire electoral and financial legal framework in force.

<sup>&</sup>lt;sup>604</sup> Audit report National Conservative Party Albania.

Report format<sup>605</sup> requires questions, orientations and specifications, the complete answer of which gives a complete and clear overview of the performed audit and possible problems.

The worrying thing is that in almost no report, the proper completion is not at 100% of it, leaving gaps.

In a general judgment it is noticed that the audit conducted by legal experts is superficial, without delving into some important elements of the financial activity of the parties.

There are cases of submission of incomplete reports completely according to the format approved by the CEC in  $2021^{606}$  or reports with material errors<sup>607</sup>.

There are also cases where auditors use as legal basis the provisions of the Electoral Code which was in force before the changes of 2020, and therefore the control is performed referring to those rules.<sup>608</sup>.

Cases of receiving donations worth more than 50,000 lek made in cash, or payment of invoices worth more than 150,000 ALL cash in some electoral subjects, invoices with dates beyond April, are not considered as violations of the law by audits<sup>609</sup>.

The vast majority of auditors do not mention in the relevant report the audit of the financial activity of the candidates of the respective subject.

Only 2 audits <sup>610</sup> refer to problems related to candidate reporting.

Although a very important element is the cross-referencing of the data found by the audit with those reflected in the monitoring reports by the election campaign monitors, no audit has presented in the relevant report a comparison on the compliance of the data found, avoiding as questions in the vast majority of reports, but also specifying that cross-referencing is impossible<sup>611</sup> or for the audited subject there was no monitoring report<sup>612</sup>.

As KRIIK has stated before, the monitoring process in these elections failed to fulfill the function for which it was charged in the legal framework, a finding which is also evidenced by legal auditors.

From the complete review of the reports of the statutory auditors, ascertained problems identified by the auditors regarding the financial activity of the electoral subjects and specifically:

• The Socialist Party has exceeded the legal limit of expenses that an electoral subject could incur for the effect of the election campaign.

<sup>&</sup>lt;sup>605</sup> Election campaign audit format

<sup>&</sup>lt;sup>606</sup> Audit report Party Legality Movement; Audit report Social Democratic Party; Audit report New Democratic Spirit; Audit report National Development Movement.

<sup>&</sup>lt;sup>607</sup> Audit Report Justice, Integration and Unity Party, the audit confused the detail of expenditure items; Audit report The Agrarian Environmentalist Party of Albania, the audit has inaccuracies in the detailing of the donor list and the detailing of the respective items and expenditures; Audit report The Balli Kombëtar party has submitted a report that is not in the format approved by the CEC, but the audit does not identify this as a problem by giving an unreserved opinion of the party.

<sup>608</sup> New Movement Party Audit Report, Democratic Conviction Audit Report, Movement for Change Audit Report.

<sup>&</sup>lt;sup>609</sup> Socialist Party Audit Report, New Movement Party Audit Report, Democratic Conviction Audit Report, Movement for Change Audit Report, etc.

<sup>&</sup>lt;sup>610</sup> Audit report Democratic Party of Albania, Audit report Democratic Conviction Party.

<sup>&</sup>lt;sup>611</sup> Democratic Party audit report.

<sup>612</sup> Audit report of the Balli Kombëtar Demokrat party.

- For the National Conservative Party Albania, the audit could not conduct the audit due to lack of cooperation by this entity.
- Democratic Party auditors were not provided with self-declaration reports of the candidates of this entity.
- Balli Kombëtar Demokrat did not provide the audit with information regarding the opening of the special bank account.
- Finding false statements regarding the number of Democratic Party election offices.
- Failure to declare donation of television time as in-kind donation to FRD.
- For three electoral subjects, 2 political parties and an independent candidate, the lack of regular tax documentation was found. 613.
- The estimated value of the in-kind donation was lower than the real value of the services obtained by the Socialist Party, namely the lease contracts for the election offices were concluded at a lower price than the reference price in the respective area.
- Submission of problem reports, such as not including any income in it by submitting a deficit report<sup>614</sup>, non-inclusion of records of all donors making it impossible to verify identity and complete the declaration of conflict of interest<sup>615</sup>, or submitting a non-standardized report without providing a true picture of financial activity<sup>616</sup>.
- Entities that have not opened special bank accounts for conducting financial activity in function of the election campaign<sup>617</sup>, or despite the existence of this account there have been expenses not incurred through it but from other party accounts<sup>618</sup>.

# VIII.5. Annual funds for political parties

For 2021, the total annual fund distributed to 6 political parties according to the provisions of the Law "On political parties" 619 was 140.000.000 ALL. This fund was distributed by decision no. 24 of the State Election Commissioner 620.

The annual financial activity of political parties is also subject to audit by licensed accounting experts, legal auditors, appointed and contracted by the CEC. The appointment of auditors for the annual funds

<sup>&</sup>lt;sup>613</sup> The Socialist Party has had cases when the expenses were not with a tax invoice, but only with a tax coupon, or vice versa, a tax invoice was issued, but the tax coupon was missing. For the subject Christian Democratic Party and the candidate Pal Shkambi, expenditures were found without the relevant tax documentation.

<sup>&</sup>lt;sup>614</sup> The Justice, Integration and Unity Party did not include in its report the revenues generated from the other party account; Independent candidate Pal Shkambi did not declare all income in his report.

<sup>615</sup> Independent candidate Iljaz Shehu.

<sup>616</sup> Democratic Balli Kombëtar Party

<sup>617</sup> Democratic Conviction, Social Democratic Party, Christian Democratic Party, New Democratic Spirit Party, Knitting Initiative Party, Movement for National Development Party, independent candidate Pal Shkambi and candidates of Agrarian Environmentalist Party and New Movement Party, these have received income and incurred expenses during the election campaign. Apart from them, other entities did not open special bank accounts, but did not have any financial activity in function of the campaign: PBDSH, PKD, PLL, PBLD, POSH, PBPPSH, PESH, ADRE, PBK.

<sup>&</sup>lt;sup>618</sup> Democratic Party, Socialist Party, Justice, Integration and Unity Party.

Law on "On political parties" article 24.

<sup>620</sup> Decision no. 24 dated 02.02.2021 "For the distribution of annual funds to political parties in the form of annual financial assistance for the year 2021".

of 2020 was made by the CEC with the decision<sup>621</sup> dated 12 July, after the postponement of this process in April 2020.

In terms of annual financial activity, political parties have a legal obligation<sup>622</sup> to submit an annual financial self-declaration report to the Central Election Commission. For 2020 only 25 parties<sup>623</sup> of 131 submitted this report to the CEC, of which four<sup>624</sup> outside the legal deadline<sup>625</sup>.

This is a situation, which has always been present, and despite this behavior of political parties, the CEC has not taken any steps to apply the legal measures provided to political parties that are in violation of the aforementioned legal framework.

For the annual financial self-declaration of 2020 not submitted to the CEC or submitted beyond the legal deadlines, the State Election Commissioner imposed<sup>626</sup> fine administrative sanctions on 110 political parties, 11 of which participated in the elections of April 25, 2021.

KRIIK assessed as a positive step this decision-making in order to establish the culture of law enforcement and equality before it, with the aim of raising their awareness for higher accountability in relation to the law and in view of transparency and financial control.

This decision of the Commissioner was appealed to KAS by 19 political parties<sup>627</sup>, through 12 appeal requests.

KAS with an intermediate decision <sup>628</sup> in addition to accepting the appeal request of the Christian Democratic Alliance of Albania to oppose this decision of the Commissioner, suspended the review of any other request that would be submitted on the grounds that since the decision of the

<sup>621 &</sup>lt;u>Decision no. 425 dated 12.07.2021</u> "To announce the result of the lottery for the appointment of licensed accounting experts (legal auditors), who will perform the audit of funds received and spent by political parties for the calendar year 2020".

<sup>622</sup> Law "On political parties" article 23.

<sup>&</sup>lt;sup>623</sup> Socialist Movement for Integration Party; Christian Democratic Party; Democratic Party of Albania; Albanian Workers Movement Party; Social Democratic Party; Socialist Party of Albania; Liberal Democratic Union Party; Justice, Integration and Unity Party; Union for Human Rights Party; Equal List Party; Social Democracy Party; Christian Democratic Party of Albania; Albanian Democratic Alliance Party; New Democratic Spirit Party; Albanian Republican Party; Moderate Socialist Party; People's Alliance Party; Democratic Party for Integration and Prosperity; New Movement Party; Alliance for European Equality and Justice Party; Movement for Change Party; Legality Movement Party; Greek Ethnic Minority Party for the Future; Solution Party; Green Party.

<sup>&</sup>lt;sup>624</sup> The Legality Movement Party submitted the report on 18.06.2021; The Greek Ethnic Minority Party submitted the report on 02.04.2021; The Solution Party submitted the report on 12.04.2021; The Green Party submitted the report on 31.05.2021.

<sup>625</sup> Date 31 March of each calendar year.

<sup>626 &</sup>lt;u>Decision no. 430 dated 22.07.2021</u> "For the submission of annual financial reports of political parties for the calendar year 2020 as well as sanctions for their non-submission".

<sup>627</sup> Christian Democratic Alliance Party, Legality Movement Party, Balli Kombëtar Party, Ora e Shqiptare Party, Democratic Union Party, Balli Kombëtar Demokrat Party, National Conservative Party Albania, Albanian People's Pensioners Union Party, New European Democracy Party, Albanian Emigration Party, Party Democratic Movement of Albania, Macedonian Alliance for European Integration Party, Democratic Movement for Change Party, Democratic Party of Albanian Muslim Union, Green Party, Greek Ethnic Minority Party for the Future, National Development Party, Christian Democratic People's Party of Albania and National Unity Party.

becision no. 62 dated 26.07.2021 "For the acceptance for review of the appeal request no. 62, submitted to the CEC on 23.07.2021 supplemented with no. 62/1, dated 26.07.2021."

Commissioner violates the interests of 110 political parties, should wait until at the end of the 30-day grievance period to jointly review all claims, because they had the same object<sup>629</sup>.

Despite the fact that the deadline for appeals against this decision was August 23, 2021, the review session of the 12 appeals submitted was conducted by KAS on September 9, 2021.

The main reasoning of the political parties regarding the non-submission of the annual balance sheets consisted in the confusion and impossibilities created due to the Covid-19 pandemic, but also in an ambiguity created regarding the legal deadline for the submission of this report.

Since the law "On political parties" defines only the obligation to submit the balance sheet and not the deadline for its submission, the CEC refers to a decision of  $2012^{630}$  and analogy with tax legislation, for setting as the deadline of March 31 of each calendar year.

KAS<sup>631</sup>, with its decision-making, changed the decision of the Commissioner, undoing for the first time the start of a process that puts not only political parties, but also the CEC itself on the rails of respecting the law regarding this issue.

Specifically, the KAS abolished the administrative sanction for two political parties<sup>632</sup>, nuk changed nothing for two parties<sup>633</sup> and reduced the amount of the fine for the other 15 entities. The amount of the fine was reduced to the minimum legal level for 3 entities<sup>634</sup>, which submitted the financial report after the imposition of the sanction and sat less for the rest<sup>635</sup>.

The measures of administrative sanction imposed by the Commissioner were significantly reduced by KAS, to more than 90% of the value, on the grounds that the CEC is the first time to take a punitive step for this violation and the principle that the law has an educational function and not punitive .

In KRIIK's judgment, this decision reflects inequality in the treatment of political parties, which were subject to sanctions by the Commissioner for the same violation.

In the case of a principled approach by the KAS, to identify the educational purpose of the law, also due to the application for the first time of sanctions for these violations as he reasoned, he should have seen and judged the case taking into account all parties subject to the decision of the Commissioner.

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<sup>629 &</sup>lt;u>Decision no.03 dated 06.11.2020</u> "On the functioning and conducting of the sessions of the Complaints and Sanctions Commission", Article 19 point 1" KAS before or during the review of an administrative complaint, decides its joint review with one or more other complaints, submitted by subjects of different against the same decision. ....".

<sup>630</sup> Decision no.14, dated 23.11.2012 "On some additions and changes to the decision no. 3, dated 18.01.2012 "On the approval of the rules for standardized formats for financial reporting of political parties, electoral subjects and financial control reporting by accounting experts".

Decision no. 111 dated 09.09.2021 "For the review of the complaining request no. 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73 of the political parties submitted to the CEC".

<sup>&</sup>lt;sup>632</sup> The Greek Ethnic Minority Party for the Future, which sent the mail by the legal deadline, and the Democratic Movement Party of Albania, which was established in November 2020.

<sup>633</sup> The Legality Movement Party and the Green Party, which were fined for submitting the report outside the legal deadline.

<sup>&</sup>lt;sup>634</sup> The National Conservative Party Albania, the Albanian Democratic Union Party and the Ora Party of Albania, the fine was reduced from 1,000,000 to 50,000 ALL.

<sup>&</sup>lt;sup>635</sup> Christian Democratic Alliance of Albania Party, Balli Kombëtar Party, Balli Kombëtar Democratic Party, People's Union of Pensioners Party, New European Democracy Party, Albanian Emigration Party, Macedonian Alliance Party for European Integration, Democratic Movement for Change Party, Democratic Party of Albanian Muslim Union, The Movement for National Development Party, the Democratic Conviction Party, the Christian Democratic People's Party of Albania and the National Unity Party, the fine was reduced from 1,000,000 to 65,000 ALL.

#### IX. THE MEDIA

### IX.1. The media environment

The freedom of speech is sanctioned in the Constitution of the Republic of Albania as a fundamental right, in accordance with international standards<sup>636</sup>. The Electoral Code defines the legal obligations of the audiovisual media during the electoral campaign, which is obliged to establish a balanced coverage of the activities of the electoral subjects and of the participating candidates in the elections<sup>637</sup>. The audiovisual media obligations are included in the same section as the electoral campaign<sup>638</sup> and some of the articles have a mixed and counterintuitive composition<sup>639</sup>. Other media, such as print and online media, have no legal obligations during the election campaign (referring to the Electoral Code), however like any media their content must be in accordance with the constitutional principles of freedom of speech and the Journalism Code of Ethics<sup>640</sup>.

The Electoral Code should include a section dedicated to media conduct during the election period (not only during the electoral campaign) by separating the campaign section from that of media conduct. The Code should include the obligation of all media operating in the Republic of Albania to meet the principles of impartiality, to objectively inform the citizens, and not be limited only to the obligations of the audiovisual media.

The Albanian media environment is characterized by a variety of traditional and online media. The media, both traditional and online, have been widely involved in covering the early electoral campaign, the official one, until the officialization of the result of these elections. But the lack of a critical healthy media approach to information broadcast to the public continued to be a concern, also identified in the past.

The audiovisual media were again involved in the dissemination of ready-made film materials of the electoral activities made by the political parties. The broadcasting of ready-made propaganda

<sup>636</sup> The Constitution of Albania, Articles 22 and 23.

<sup>&</sup>lt;sup>637</sup> The Electoral Code of the <u>Republic of Albania</u>, Article 80 "Electoral campaign of the electoral subjects on public radio and television (amended by law no. 74/2012, of 19/07/2012), Article 81"Public radio and television informative editions" (amended by law no. 74/2012, of 19/07/2012), Article 82 "Free airtime for the CEC", Article 83 "The time schedule of broadcasting", Article 84 "The electoral campaign on private radios and televisions" (amended by law no. 74/2012, dated 19/07/2012, added the letter "d" in section 2, amended the acronym and the date in section 10 by law no. 101/2020 of 23/07/2020), Article 84/1 "Coverage of the electoral campaign in local elections "(added by law no. 74/2012 of 19/07/2012), Article 85 "The monitoring of the electoral campaign in the media "(amended the first sentence of section 1 and revoked section 5, by law no. 74/2012, of 19/07/2012, amended by law no. 101/2020, of 23/07/2020).

<sup>&</sup>lt;sup>638</sup> The Electoral Code of the Republic of Albania, Part VI, "The Electoral Campaign and the Media".

<sup>&</sup>lt;sup>639</sup> For example, the obligation to publish the margin of error and other technical details together with the pre-election polls, an obligation that falls within the obligations of the electoral subjects and does not appear as an explicit obligation for media operators (Article 78, section 5 of the Electoral Code).

<sup>&</sup>lt;sup>640</sup> The latest code of ethics was drafted in 2018 by the Albanian Media Institute (AMI) with the support of the Project for the Strengthening of Legal Skills regarding Freedom of Speech and of the Media in Southeastern Europe (JUFREX), a joint initiative led by the European Union and by the Council of Europe (see the <u>Journalist's Code of Ethics</u>).

chronicles has considerably weakened the role of the media as a critical reporting platform, as well as its unaffected reporting function.

The audiovisual media lacked studio debates among the candidates, despite the high number of political TV programs. The public did not have the opportunity to watch the electoral platforms confronted through the candidates. Although the lack of debate seemed to have originated from the political decisions of the parties themselves<sup>641</sup>, in some media there have been positive attempts to unveil side by side the chronicles regarding the attitudes of the candidates for Member of Parliament of different electoral subjects.

The political actors chose social platforms as faster and more direct means of communication with the citizens, avoiding being held accountable that they would have faced in public debates.

In the print media, although free from any legal obligation, the problem of their positioning and impartiality, the lack of in-depth analysis and the lack of confrontation of different attitudes on a given topic, still lingers.

As for the online media, whose role has grown significantly during these election times, their sources of information are still a concern.

The problems faced by the media and journalists during their daily work, directly affect the attitude towards political reporting in the country<sup>642</sup>. The lack of financial independence, as well as the lack of the regulation of the journalistic profession by law, and its internal problems, endanger the delicate relationship that the media have with the politics and what binds them, which becomes even more evident during the electoral campaign. The fragile basis on which the Albanian media are built, in a democracy still in transition, makes political actors accuse it of being an involved party, used to serve the political parties<sup>643</sup>.

The attacks on the media by senior state officials are and remain a worrying problem. The Prime Minister Edi Rama has consistently attacked the media during his governing years, referring to them as "trash media" which protects the personal interests of their owners<sup>644</sup>. In addition to influencing

<sup>&</sup>lt;sup>641</sup> The Political leader of the Socialist Party of Vlorë, Mr. Damian Gjiknuri, during a TV show called <u>Breaking</u> on Top Channel (April 14<sup>th</sup>, 2021), discussed President Meta's invitation to a public debate "I'm here for the people. If the president declares to be the leader of the district's opposition, I will also break the rule set by the party and I will face him, because we have the priority to meet the people".

<sup>&</sup>lt;sup>642</sup> The European Parliament Report for the time period 2019-2020 highlighted the lack of progress in terms of the media's freedom, the external interference, especially the political ones, the journalist's job, and particularly in the investigative journalism, as well as the strengthening of the journalists' positions in this environment.

<sup>&</sup>lt;sup>643</sup> In a press conference, 10<sup>th</sup> March 2021, the President Ilir Meta stated "...the media owners are under pressure to submit to the regime...".

<sup>&</sup>lt;sup>644</sup> In a Twitter <u>post</u>, the Prime Minister Rama stated: "Imagine for a moment if we taught children that defamation, swearing, deceit and lying, are not only allowed, but also necessary tools to defeat an opponent! Today these tools are traded daily to the Albanian people by political losers and trash media".

and forcing the media to take an *a priori* political position, it also creates a climate of uncertainty and distrust among citizens, who perceive or position them as media of power or those of the opposition. The mayor of Tirana, Erion Veliaj, was also involved in occasional debates with RTV Ora News, regarding its critical attitude towards the Municipality of Tirana and the latter in the chronicles broadcast by this media. The mayor has raised strong accusations against the owner of this media entity<sup>645</sup>, while there have also been incidents between the journalists of this television and the mayor himself, which were also recorded during the elections<sup>646</sup>.

The Electoral Code allows the media to use ready-made material if it is impossible to monitor electoral activities with their own means<sup>647</sup>. This article does not in any case prohibit the media from being present in electoral activities of any kind, in case the media tries to follow and cover it themselves.

In most of the electoral activities carried out, in particular by the majority in power, independent reporting by the media was not allowed. The airing of the news was either served ready by the party electoral headquarters, or by the main director provided by the same electoral entity.

In order to fulfill its mission of receiving and broadcasting the information autonomously, the media must have the security, also sanctioned by the Electoral Code, of being free to cover any electoral activity based on their abilities and interests, and also on their editorial freedom.

Despite possible conflicts between media owners and senior officials, their mutual accusations or the dislike of these officials for the critical editorial lines followed by various media, it is and remains unacceptable to violate the full integrity of the journalist himself.

Particularly unacceptable and very serious, remains the violation in terms of physical contact or confrontation, or direct psychological pressure exerted by senior officials or representatives of state bodies, while the journalist is fulfilling his duty and mission to inform, such as the repeated attitude of the Mayor Veliaj or the Prime Minister Rama with the Faxnews journalist<sup>648</sup>.

In a press conference March 2, 2021, Prime Minister Edi Rama stated: "We started with a defamation, and we also concluded with a defamation... Who has got ears to listen and eyes to see, and then who doesn't, let them watch "Syri", "Fax", "Shijak"... thank goodness we have got you to make all this fake news satirical show pleasurable"?

<sup>&</sup>lt;sup>645</sup> During an interview on TV News 24, Mr. Erion Veliaj stated: "...It is very disturbing that we have got drug traffickers that have changed their names who own televisions. This is a fact, not an urban legend...".

<sup>&</sup>lt;sup>646</sup> Supporters of the mayor, Erion Veliaj, did not allow the TV reporter of Ora News, to ask him a few questions during his meeting with the residents of Kavajë, by forcibly removing him and the film crew. (A TV Ora News Report of April 14<sup>th</sup>, 2021 "Unprecedented / Supporters of Veliaj, forcibly removed the journalist and the crew of Ora"). The images published in the media, showed the constant concern of the media, for not allowing them in electoral activities.

<sup>&</sup>lt;sup>647</sup> Article 84, of the Electoral Code, the Electoral Campaign on private televisions, section 'd' "The audiovisual media prepare the news in full editorial freedom. When for objective reasons the media are unable to follow specific electoral activities, it is allowed to use and select videos from the complete recordings served by the electoral subjects, as long as the news is accompanied by the note "film material provided by the subject..."

<sup>&</sup>lt;sup>648</sup> During a <u>statement to the media</u> regarding the continuation of the vaccination process on March 13<sup>th</sup>, 2021, the Prime Minister Rama asked the Fax News reporter, who did not have a protective mask, to leave and put on one. His request, more of an order, was accompanied by Prime Minister Rama's physical contact with the journalist, touching and pushing her hand as a sign of distancing.

In this same line was also the decision of the Special Court of First Instance for Corruption and Organized Crime of Tirana, which forced the news portal "Lapsi.al" to subject the editorial servers to further investigations after the publication of the investigative news regarding the *database* that contained the personal data of 910,000 citizens of Tirana. This decision has severely violated the media's right to protect its sources, especially when they are of great public interest<sup>649</sup>. The issue of the source of information's protection, and the media's freedom of speech, were the two fundamental principles that gave the "Lapsi.al" news portal, the right in the Strasbourg Court not to submit the servers where the news portal informative materials were stored<sup>650</sup>.

It is important to provide for the safety and inviolability of the journalistic profession and its rights in the legislation, in order to fulfill its informative mission unaffected by external or even internal censorship pressures imposed by the owners or by the boards of directors.

#### IX.2. The audiovisual media

The electoral code establishes the legal obligation to cover the election campaign for the audio and audiovisual media<sup>651</sup>. The Audiovisual Media Authority is a competent independent institution that supervises these media, based on the Audiovisual Media Act, which provides the basic principles that form the basis for the development of audiovisual activity, during electoral campaigns<sup>652</sup>.

With the abolition of the *ad hoc* group of the Media Monitoring Board, set up by the CEC to monitor audiovisual media during the electoral campaign, this competence passed to the AMA. This institution, since 2019, has been functioning with shortcomings in its board, while the election campaign found the chairman of AMA with a completed mandate, while the board was made up of only four members, out of seven provided by law<sup>653</sup>.

<sup>649</sup> The owners of this news portal have called this blocking request a decision made by the government structures. A "Lapsi.al" report by journalist Armand Shkullaku: "We cannot work in our editorial office. We have again stopped the judicial police officers to enter our offices. We told them:' if you want to enter our offices, go ahead and blow them up'. We do not submit material ourselves, as we consider it a violation of freedom of speech. We asked for two days to consult our lawyers. The judge's decision seems excessive to us, because it seems more motivated by an order from above than by a real investigation from below. We believe that in this case the accusation is not used for the purpose for which it was created, as well as the Special Court".

<sup>&</sup>lt;sup>650</sup> The Statement of the Strasbourg Court: "The authorities should stop the implementation of the interlocutory decision of the Specialized Court of First Degree Against Corruption and Organized Crime no. 131 of 18<sup>th</sup> April 2021, and to stop the confiscation of any equipment for archiving data and computer/electronic data belonging to journalists "(see, the report by Lapsi.al" The Strasbourg Court protects Lapsi.al. SPAK has no right of confiscation").

<sup>&</sup>lt;sup>651</sup> Article 85 of the Electoral Code of the Republic of Albania

<sup>&</sup>lt;sup>652</sup> <u>Law no. 97/2013</u> "On audiovisual media in the Republic of Albania". Amended by law no. 22/2016 of 10/03/2016 Amended by the Resolution no. 56 of 27.07.2016 of the Constitutional Court of the Republic of Albania and by law no. 91/2017.

<sup>&</sup>lt;sup>653</sup> The president of the AMA, and one of the members, have continued to work with a completed mandate since October 2019. In the meantime, this institution came with an absence even before the dismissal of one of the members, while the

The AMA set up an *ad hoc* commission that would oversee the monitoring and data processing process throughout the election campaign. The monitoring process was based on the methodology approved by the CEC, three months before the official launch of the campaign<sup>654</sup>.

After reviewing the methodology, which involved quantitative and qualitative measurements, the AMA board announced that some of the provisions of that methodology could not be met<sup>655</sup>. AMA monitoring relied almost entirely on quantitative data (mainly the number of minutes dedicated to a particular election topic) and lacked qualitative elements that would allow for a clearer understanding of the level of media impartiality and the quality of information provided to citizens (such as the context of media coverage)<sup>656</sup>.

The AMA should take steps to ensure that media coverage in the future is monitored both in quantitative and qualitative terms, such as the context or the tone used by the media to cover the election campaign, and other elements.

AMA monitored a total of 53 Audiovisual Media Service Providers (AMSPs), which were divided into two separate groups, using the geographic coverage element as the selection criterion and classifying them into AMSPs with permanent coverage and those with recorded material<sup>657</sup>. The purpose of this division was for all media service providers to participate in monitoring campaign coverage.

fourth member had resigned due to his candidacy for Member of Parliament in the elections of 25<sup>th</sup> April 2021. The replacement of these vacancies and the selection of new candidates has long been postponed by the Committee on Education and the Media of Public Information due to the non-fulfillment of the number or conditions set out in Article 10 of Law no. 97/2013 "On Audiovisual Media in the Republic of Albania" (*amended*). The procedures for the reassignment of the AMA's President, were resumed after the elections, when the Commission for Education and the Media of Public Information, with the <u>Decision No. 13/2021</u>, re-announced the vacancy for the President of the AMA, a process from which the Commission selected two candidacies which were submitted to the Assembly for approval. <u>In the</u> last session of the legislature of this parliament, the candidacy of the president of AMA was approved on July 7<sup>th</sup>, 2021.

<sup>654</sup> Decision No. 02, of 30.01.2021 "On the approval of the Methodology for Monitoring Audio and Visual Media". According to the monitoring methodology, the AMA would monitor the AMSP daily, whose data would be summarized in weekly reports, which required the approval of the AMA's Board of Directors and to be accompanied by suggestions regarding the taking precaution in case of violations. These daily reports have been submitted to the CEC and published on its official website. The weekly reports were reviewed by the CEC Commissioner along with relevant suggestions in case of violations by AMSP during the monitoring.

<sup>655 &</sup>lt;u>Decisions of the Board of AMA of 02/02/2021</u>, AMA at this meeting reviewed the decision of the CEC "On the Approval of the Methodology of Monitoring Audio and Audiovisual Media" and agreed to notify the CEC of the impossibility of implementing some provisions of this Act.

<sup>656</sup> According to the Methodology, Article 9 "Content of the Monitoring report", Section 2: The AMA report within its organizational and logistical capabilities may contain the following qualitative data: a) The number of times a given word is used to describe a particular politician, b) The number of female candidates mentioned in the media and c) The number of times each political actor (e.g. a candidate or other politician) is mentioned.

<sup>657</sup> Each week, the monitoring team monitored 34 AMSPs, including 27 channels (23 televisions and 4 radios) with permanent monitoring by the AMA, while 26 local coverage channels with recording of programming presented by these AMSPs. to the Audiovisual Media Authority. AMSPs covering more than 48% of the population in the geographic area, would be permanently covered by the AMA, while AMSPs covering less than 48% of the population, would have to send to the AMA, their daily materials recorded for monitoring.

AMA published the list of AMSPs required by article 6 of the methodology, for every week<sup>658</sup>.

In these reports, the broadcast time of each electoral subject and political actor was monitored, in the news, in live broadcasts, in political content shows, in the order of placement of candidates, as well as in the gender ratio of the media coverage of candidates. The daily reports compiled by AMA were sent to the CEC and then were published on the official website of the latter.

The weekly reports approved by the AMA were sent to the CEC for review with suggestions for relevant administrative measures, in cases of violations found under the AMA.

Based on the findings in the weekly reports, the CEC was the institution that could take administrative measures in case of violation of obligations by the AMSPs. However, the Commissioner reviewed only two weekly reports within the campaign period<sup>659</sup>.

The Electoral Code of the Republic of Albania establishes that during the political broadcasting of the informative editions, the public TV or radio is obliged to implement equal time ratios for all parliamentary parties, which in the last elections for the Assembly received up to 20 per cent of the seats in the Assembly. Parties that have won more than 20 per cent of the seats in the Assembly, benefit from an equally distributed airtime. Each of these parties benefits twice as much time as a party that has won up to 20 per cent of the seats in the Assembly, while this obligation also applies to private audiovisual and audio agencies.

In the report analyzed by KRIIK, regarding the summary table of the monitoring in the 30 days of the election campaign, it was found that none of the AMSPs had accurately implemented the coverage balances of the electoral themes.

<sup>&</sup>lt;sup>658</sup> Articles 6, letters "a" and 8, of decision no. 2, dated 30/01/2021, of the Regulatory Commission, "On the Approval of the Audio/Audiovisual Media Monitoring Methodology", provide that private AMSPs with regional coverage that cover less than 48 percent of the population are made through selection based on the geographical coverage, audience, broadcasting time schedules, format of the contents broadcast by the AMSPs, type of media, target audience of this type of media in public / political bodies as well as local media that are not covered by the monitoring tools must deposit to the AMA, the content broadcast at the start of each subsequent monitoring day.

Decision no.46 of the AMA of 26.03.2021 on the Determination of the List of Electoral Subjects that will be monitored for the electoral campaign of 26 March 2021 - 03 April 2021.

Decision No. 52 of the AMA of 04.06.2021 on the Determination of the List of Electoral Subjects that will be monitored to cover the electoral campaign of April 4, 2021 - April 10, 2021.

Decision No. 57 of the AMA of 14.042021 on the Determination of the List of Electoral Subjects that will be monitored for the electoral campaign of April 12, 2021- April 20, 2021.

Decision No. 60 of the AMA of 22.04.2021 on the Determination of the List of Electoral Subjects that will be monitored for the electoral campaign of April 20, 2021 - April 24, 2021.

<sup>&</sup>lt;sup>659</sup> <u>Decision No. 257</u>, of 21.04.2021 "On the revision of the report of the Audiovisual Media Authority on coverage of the election campaign by the AMSP for the period 04.04.2021 - 11.04.2021".

<sup>&</sup>lt;u>Decision No. 224</u>, of 13.04.2021 "On the revision of the report of the Audiovisual Media Authority on coverage of the election campaign by AMSP for the period 26.3.2021 - 3.4.2021".

In the weekly reports that AMA sent to the CEC, it repeatedly called attention to AMSPs to offset coverage balances in news editions.

However, the identified AMSPs, in addition to not meeting the AMA requirement, was noted that the time compensation difference increased to the end of the campaign.

The Socialist Party received considerable coverage compared to the Democratic Party, in about 50% of the AMSPs. However, this figure is even higher, if it were to calculate the times defined in the monitoring tables such as the Government. This is also due to the fact that during the election campaign, KRIIK noted that it was very difficult to differentiate a chronicle of senior government officials which were not electoral in character<sup>660</sup>.

As in the Electoral Code, in the suggestions sent by the AMA, but also in the decisions of the CEC, in no case is there a deadline for private televisions, regarding the compensation of the missing time for an electoral subject, in the informative editions<sup>661</sup>.

Although the Code provides for sanctions up to a ban on signal transmission for non-compliance with space budgets, the CEC has not taken action for the AMSPs which have repeated such violations<sup>662</sup>.

The legislation should clearly define deadlines to compensate for the missing media space for an electoral subject. These deadlines should take effect immediately throughout the monitoring period, so as to ensure an impartial coverage of election activities.

The Albanian Public Radio and Television, which has a legal obligation to be balanced, has not maintained the balance of coverage on the news<sup>663</sup>. Unlike private AMSPs, for public television the Code clearly defines the terms for the compensation, in the event of absence of the broadcast time of the media in informative editions for electoral topics.

But at no time during the review of the weekly or final reports did the CEC take any action for the repeated violation of public television<sup>664</sup>.

<sup>&</sup>lt;sup>660</sup> The Prime Minister Edi Rama and other members of the government cabinet presented themselves with the signs of recognition of the election campaign (such as masks or hats with the number 12 on them) even during events that should not have an electoral character.

<sup>&</sup>lt;sup>661</sup> Electoral Code of the Republic of Albania, Article 84 "Electoral campaign on private radio and television", section "a".

 $<sup>^{662}</sup>$  Article 84 of the Electoral Code in case of violation of the reports of coverage in favor of a party, the CEC, mainly or on the proposal of the CEAZ, sanctions the local radio and television operator with 1 500 000 lekë and the national radio and television operator with 3 000 000 lekë .

<sup>&</sup>lt;sup>663</sup> RTSH 1 dedicated to PS 288.4 minutes, to PD 262.6 minutes, to LSI 44.35 minutes and to PSD 15.07 minutes. RTSH 24 dedicated to PS 208.45 minutes, to PD 128.28 minutes, to LSI 18.9 minutes and to PSD 17.18 minutes. RTSH 2 dedicated to PS 74.55 minutes, to PD 89.92 minutes, to LSI 8.98 to PSD 7.33 minutes.

<sup>&</sup>lt;sup>664</sup> Electoral Code of the Republic of Albania, article 81, section 2 In case of violation of the reports of coverage in favor of a party or a coalition, the Central Electoral Commission orders the reduction of equal time available to the political party or coalition or compensation of other political parties or coalitions with additional airtime within 48 hours.

The Socialist Party has dominated the media space in both public and national news editions, whose television signal is spread over most part of the territory.

This way, when most of the citizens of the country have access to these televisions, they were consequently exposed to one-sided information<sup>665</sup>.

As for parties holding less than 20% of the seats in the Assembly, non-parliamentarian ones and independent candidates, the coverage figures were not in line with the implementation of the Electoral Code. Their activities took up very little space on the news or political programs, especially on national television. The CEC, in reviewing the final election campaign monitoring report, did not take any administrative measures against the AMSPs regarding this violation.

Problems have also emerged in the monitoring of local media, which cover less than 48% of the country's population. Reviews of the weekly reports found that some of the local media have repeatedly failed to submit, under their obligations, the materials recorded in the AMA for monitoring, for some of which the CEC has taken administrative measures<sup>666</sup>.

KRIIK noted that this violation was repeated even after taking these measures. However, the CEC has not taken any equivalent measure, nor an escalation of that measure in the event of a recurrence of this violation. This deficiency did not show the real behavior of these AMSPs towards the balance of the coverage of the entities, as there were significant deficiencies in the monitoring materials, not giving a clear picture with the compliance or not, of the legal obligations.

An added fact that does not present the real behavior of the local media but also their impartiality in transmitting information, is the link between ownership and politics<sup>667</sup>. Unable to understand the context of reporting information on local channels due to AMA's lack of quality monitoring, KRIIK through its long-term observers, found that in the local public in the districts where these channels operate, there is a public perception about biased political channels.

KRIIK, considers the definition and details of the media space balance to be important, including the margin within which the maximum airtime in favor of a political entity is acceptable, as well as a

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<sup>665</sup> KRIIK noted that tendencies towards one-sided coverage in favor of the party and the government in power, were evident even before the election campaign began, on public and national TV. KRIIK found that from September 2020 to March 2021, before the start of the official campaign, in the tables published by AMA it can be seen that these AMSPs gave more media space to the two major parties and above all to the majority, while there was a lot of media space. times less dedicated to other parliamentary parties. (see "Content Monitoring" tables September 2022 - February 2021)

<sup>&</sup>lt;sup>666</sup> In the decision no. 257 of 21 April 2021, the CEC has decided to take the administrative measure, to the extent of 5000 (five thousand) lekë, not having filed the recordings for the period 4.4.2021 - 11.4.2021, for audiovisual media service providers (AMSPs): - TV Channel 1, - TV Kopliku, - TV Antena Nord, - TV Klaudiana, - TV Skampa, - TV Jug, - TV Gold, - TV Glob, - TV Puka, - TV Adria Med.

<sup>&</sup>lt;sup>667</sup> TV Bulqiza's owner, Mr. Edmond Isaku. was at the same time a candidate of the Democratic Party. In the AMA summary report, TV Bulqiza dedicated more coverage time in news editions to the Democratic Party, although according to AMA this AMSP has repeatedly violated the law by broadcasting news editions of another AMSP.

review of administrative measures for the AMSPs that violate these balances on the basis of missing differences.

The favoritism of the Socialist Party was also seen in the space it was given in political advertising. The total broadcast time of political announcements during the election campaign by each private broadcasting radio and television channel cannot exceed 90 minutes for each party registered for election<sup>668</sup>. However, the Electoral Code stipulates that the airtime of political announcements for non-parliamentary parties and independent candidates must not exceed ten minutes during the entire election campaign, as on private television. As for public television, the CEC sets a free broadcast time for parliamentary parties of 30 minutes, while for non-parliamentary ones and independent candidates no more than ten minutes<sup>669</sup>.

KRIIK considers important the equal opportunities that should be given to electoral entities, or independent candidates, in the space of political advertising on public television. Likewise, the Electoral Code should give all electoral entities, as well as independent candidates, equal opportunities to promote their platforms in private media by increasing the transparency of political advertising rates on these media.

Only 13 media companies presented political advertising rates during the CEC election campaign, despite the legal obligation of all audio and audiovisual media<sup>670</sup>. AMA reports on political announcements, show that there were 33 AMSPs broadcasting political announcements<sup>671</sup>.

About 65% of the media did not comply with the legal obligation not to exceed the maximum duration of the advertising broadcast during the 30 days of the campaign<sup>672</sup>.

The Socialist Party appears to have spent more on TV advertising, as in total over 50% of the media dedicated more space to the Socialist Party, including the three national televisions.

Over 50% of private media, including also the three private national ones, aired multiple political ads in favor of the Socialist Party, making the latter dominate the media space in this regard.

While about 45% of the televisions dedicated more space to the Democratic Party, which corresponds to the same televisions that have dedicated most of their time to this party also in informative editions. On two local televisions it was noted that two non-parliamentary parties had spent more on political

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<sup>&</sup>lt;sup>668</sup> Electoral Code of the Republic of Albania, Article 84 "Electoral campaign on private radio and television", section 5. <sup>669</sup> Ibid., Article 80 "Electoral campaign of the electoral subjects on public radio and television", section 1.

<sup>&</sup>lt;sup>670</sup> These 13 media companies include 15 AMSPs and 4 online media.

<sup>&</sup>lt;sup>671</sup> 14 The CEC does not publish political announcement fees from 14 AMSPs, which are local televisions operating in the country.

<sup>&</sup>lt;sup>672</sup> REAL TV, 6+1 Vlorë, Klan TV, Klan Plus, Klan News, One tv Vlorë, Top Channel, Report Tv, News 24, Abc news, Euronews Albania, RTV Ora, Vizion Plus, Syri Tv, Fax News, Top News, Tv Best, Shijak Tv, A2 CNN, Kanali 7, Antena Nord.

advertising, the broadcasting time of which was many times higher than that provided for by the Electoral Code<sup>673</sup>.

The CEC has repeatedly drawn the attention of some AMSPs, during the reviews of the weekly reports, for broadcasts at times not specified by the Electoral Code of political advertising.

Furthermore, some of the advertisement did not meet the standards required for their identification and their content presented elements of disorientation for those who followed it or were transmitted outside the time intervals set by the Electoral Code<sup>674</sup>.

However, the CEC did not take any administrative action regarding repeated violations of the AMA monitoring findings.

The lack of financial transparency of the media raises concerns about their funding, especially during election periods through political advertising. KRIIK through sporadic observations noted that some television productions (shows, TV programs) had political advertising characteristics<sup>675</sup>.

The use of logos, slogans or even ordinal numbers on the ballot paper of parties or candidates for Member of Parliament participating in the elections is a direct promotion. The lack of a definition of political advertising in the legislation, leaves room for abuse by the media, but also by electoral subjects or political actors.

It is important that the Electoral Code clearly defines the definition of political advertising, on the basis of which the AMA monitors and increases transparency from the media, especially national ones.

<sup>&</sup>lt;sup>673</sup> The local AMSP RE.AL aired 702.3 minutes of political advertising for the Democratic Conviction Party.

The local AMSP 6 + 1 Vlorë, aired 206.05 minutes of political advertising for the "Movement for Change".

<sup>&</sup>lt;sup>674</sup> For up to 30 days of campaigning, Klan News ran political advertising in all of its informational editions.

Top Channel and Report TV on April 23, 2021, aired commercials with characteristically disorienting about the voting method.

<sup>&</sup>lt;sup>675</sup> KRIIK noted that in some television productions, political actors would be invited to programs that are not aimed at promoting candidates for Member of Parliament, but at entertaining audiences. However, in these cases, the candidates would appear in the television studios with the ordinal number that the electoral subject competes in the ballot (Case of Prime Minister Rama invited to the satirical show "Klanifornia", wearing a hat with the number 12 on it).

On Top Channel was broadcast before the start of the election campaign, but also during it, the show "Kandidati", which according to the presentation made by the media to this television production was "A program that brings to the public a complete profile of parliamentary candidates for the 2021 parliamentary elections. We will be all over Albania, with every candidate intending to be a M member of Parliament". The cycle of this political show began with the promotion of the first candidate on February 4, 2021, even though the lists of Members of Parliament were presented by the parties on 9 March 2021, while the electoral campaign officially began on 26 March 2021. It is not clear how the selection of candidates to be promoted, after the start of the official campaign, did not maintain the balance of representation there provided, as required by the Electoral Code. Throughout the series of this show, each candidate similarly showed the ordinal numbers in which the candidates were placed on the ballot paper.

As for electoral silence, the media maintained its principle the day before the election day. The only administrative measure decided by the CEC during the review of the final monitoring report was the violation of electoral silence by the public AMSPs: RTSH 2 and RTSH Kukës, broadcasting reports on the activity of political entities during the electoral campaign<sup>676</sup>.

The fact that the campaign was centralized in its concept focusing only on political party leaders was also translated into figures in the monitoring reports. In the summary tables, the highest time is occupied by the head of the government, Edi Rama, followed by the leader of the Democratic Party, Lulzim Basha<sup>677</sup>. The focus of the media space only on these two figures, has given very little space to the promotion of new candidates and platforms, participating in the elections.

AMA, in monitoring the airtime of direct statements, reported the data for the president of the country Ilir Meta. Although the methodology approved by the CEC does not include the head of state in the monitoring<sup>678</sup>, President Meta was the third consecutive in the media to make public statements<sup>679</sup>, highlighting his active involvement in this process<sup>680</sup>.

The maintaining of gender reports has also been a problem in media coverage. In the AMA reports, not all AMSPs imposed an obligation to give women the space they needed during the electoral campaign.

In the informative editions, only 13% of the total airtime of the direct synchronizations of candidates was allocated to female candidates, thus highlighting the concern that the fulfillment of the numbers on the lists or seats in the Assembly does not correspond to the equality given to the female candidates in the media space.

The repeated violations, even after the decision of the CEC, the failure to set a clear deadline for the compensation of the broadcast time to the electoral subjects, within the official deadline for the end of the electoral campaign, and the transfer of such figures after its end, indicate a deadlock in the functioning of the media behavior control mechanism.

Decision making on the violations of obligations has no immediate effect. The purpose of monitoring is to ensure the balance of television broadcasts for electoral subjects and candidates in them, only for 30 days of electoral campaign. As such, the decision and correction of any violation by the AMSPs

<sup>&</sup>lt;sup>676</sup> The decision of the CEC on "Revision of the report of the summary tables for monitoring the coverage of the election campaign by the AMSPs for the period 26.03.2021 - 23.04.2021, as well as compliance with the electoral silence period" has decided: Administrative provision for RTSH, an administrative sanction of 2,000,000 (two million) lekë. RTSH in this case explained that the airing of news relating to electoral activities had come only due to the neglect of retransmitting material from the previous day.

<sup>677</sup> Prime Minister Edi RAMA 3545.77 minutes, Democratic Party Leader Lulzim Basha 2986.17 minutes

<sup>&</sup>lt;sup>678</sup> Audiovisual Media Monitoring Methodology, Articles 6, 7 and 9.

<sup>&</sup>lt;sup>679</sup> The President Ilir Meta 1153,04 minutes.

<sup>&</sup>lt;sup>680</sup> The Constitution of Albania in Article 86, section 1 defines the President of the Republic as "Head of State representing the unity of the people", therefore as such he cannot be considered a political actor, in the sense of an electoral subject.

should correspond to this period, in which the citizen should be informed in a balanced way, of which the competent bodies, AMA and CEC are the guarantor.

The same content was continually provided to the public, due to the broadcast of "ready-made tapes", independently of the AMSPs they followed. The lack of qualitative data did not provide a complete picture of media behavior towards subjects and candidates in the elections. The calls to the attention of the AMA, in its reports and the failure of the CEC to take administrative measures, did not put real pressure on the media to implement the obligations under the law. The methodology designed for media monitoring is only applied during the official campaign, while news of an election nature was featured in the media long before the start of this campaign.

In order to have a monitoring, which shows the real behavior of the media in Albania during the electoral time period, it is important that it is carried out in detail, it extends over time, and it includes elements of qualitative monitoring.

The mechanism for monitoring and sanctioning media behavior should be reviewed to ensure that citizens receive impartial and objective information throughout the election campaign. The CEC should review AMA's reports much more frequently and set clear deadlines to make up for missing time.

### IX.3. The print media

Currently 11 newspapers with generalist forms are published in Albania, which despite the decline in printing still remain an important source of information. However, their influence remains significant, to which is added the fact that their front pages are read every day in the morning programs of Albanian television, but it is also emphasized that these newspapers also have their own online news portal. The behavior of the print media during the election campaign is not regulated in the Electoral Code, however its reporting must first adhere to the principles of the Constitution and the Journalism's Code of Ethics.

KRIIK unsystematically monitored ten generalist newspapers in the period of March-May 2021<sup>681</sup>. The monitoring consisted of determining the political parties and their representatives approximately as a percentage of the space occupied in the pages of newspapers, designated by the editorial office as "Politics" In addition, the front-page headlines of each newspaper and how many of them were

<sup>&</sup>lt;sup>681</sup> 1.Panorama 2. Fjala (Daily independent newspaper) 3. Dita (Daily info-analytical) 4. Koha Jonë (Daily independent newspaper. This *newspaper stopped publishing in print on 1 July 2021*) 5. Gazeta Shqiptare 6. Mapo (Daily independent newspaper) 7. Sot 8. Tema (Daily newspaper) 9. Telegraf (Daily independent newspaper) 10. Standard (Daily newspaper). <sup>682</sup> In the newspapers Tema and Mapo, in the absence of the naming of the page "Political", the pages named as "Actuallity" were monitored. The "Fjala" newspaper also included pages named "Main Information".

devoted to election reporting, were counted. In this area, only news dedicated to the coverage of electoral activities, or interviews with political representatives in which only the elections were discussed, were taken to measure. The purpose of this monitoring was to understand the climate that reigned in the print media and how much the pre-election and official campaign was present on the front page of these newspapers.

In the period before the election campaign, from March 1 to March 26, it was observed that about 30% of these newspapers balanced the coverage space to report on the elections of the two major PS-PD political forces. While about 40% of the remaining newspapers had a margin of more than 10%, in the coverage of one or the other party. About 30% of the total number of newspapers monitored, dedicated a space to the LSI party for electoral news, greater than or equal to the two main parties.

Meanwhile, about 20% of the newspapers dedicated more space to the coverage of electoral news programs of President Ilir Meta. While, in total, around 60% of them have dedicated almost the same space to the head of state, to the country's main parties.

The small parties participating in the elections, in total, do not spend more than 5% of the coverage space of the electoral reports on the selected sites, while about 30% of the total newspapers dedicated 0-1.5% to these parties.

About 60% of newspapers devoted less than 50% of their coverage to reports from other institutions, or internal editorial writings, representatives of civil society or experts within the pages labeled as "Politics".

While during the electoral campaign from March 26 to April 25, 40% of the newspapers had a difference of 20% in the space occupied by one of the country's two main parties<sup>683</sup>. The third largest party in the country, the LSI, occupied the largest or equal share of political space, compared to PD and PS, in 30% of newspapers<sup>684</sup>. While in 70% of them they occupy less than 5% of the political pages.

As for the other opposition parties running for the elections, they were very under-represented in the political pages of the print media. In total, small parties occupied no more than 5% of the coverage of election activities in any of the newspapers. Even in 40% of them, the space occupied by the coverage of President Meta's activity or statements in relation to the elections, is greater than or equal to the smaller parties.

<sup>684</sup> The LSI party was mostly represented in the following newspapers: "Koha Jonë", "Standard", "Telegraf".

<sup>&</sup>lt;sup>683</sup> The newspapers with this difference were: "Dita", "Koha Jonë", "Mapo", "Standard".

Even the front page of these newspapers, as the main indicator of their editorial line, assumed particular importance during this period, as their reading time was dedicated to morning television programs, potentially increasing the number of readers of only the first page of these newspapers.

In the period preceding the start of the electoral campaign, it was found that most of the headlines on the front page of these newspapers, had an authentic electoral character.

During this survey, it was found that 50% of the newspapers had a political entity or actor representing them in the headlines. Meanwhile, 10% of these papers only covered one political force in the headline<sup>685</sup>. It was noted that 30% of these newspapers were unbalanced in headline coverage. Even about 40%, in the title, had largely negative marks in the coverage<sup>686</sup>.

During the observation of the official campaign, it was noted that the balance in the selection of titles related to the electoral campaign did not necessarily coincide with the balance within the political pages of the newspaper.

50% of the newspapers had a balanced headline on the front page relating to the main political forces, but in 20% of them they did not correspond to balanced contents, within the political pages.

During this monitoring it was noted that in the front pages of the newspaper the main headlines in 60% of the newspapers were directly linked to the electoral campaign. In 50% of the newspapers monitored, the headlines were in favor of a political force or had negative marks against the opposing political force.

While the post-electoral period, with the counting and the reporting process, was widely dealt with in the print media. Their attitudes towards the election result matched their attitudes during the election period. About 60% of them covered extensively the problems and complaints that followed the post-election day period.

During this monitoring KRIIK found that print media continues to be affected by the close ties their owners have with politics<sup>687</sup>.

The media should avoid the influence of the editorial line on the impartiality and objectivity of the information transmitted, especially during an electoral campaign, where the sensitivity of the public

<sup>&</sup>lt;sup>685</sup> During the official election campaign, it was noted that "Gazeta Shqiptare" always had an article about or for the Democratic Party as its main article.

<sup>&</sup>lt;sup>686</sup> "Koha Jonë", "Mapo", "Telegraf" and "Standard" had negative tones in most of the government-related titles.

<sup>&</sup>lt;sup>687</sup> "Koha Jonë", owned by journalist Nikoll Lesi, only went online on July 1, shortly after the elections. In an editorial written by Nikoll Lesi, then republished altered, he also wrote about the relationship and agreement between politics and the publication of news in this newspaper. Throughout his article, Nikoll Lesi talked about the relationship between President Meta and the newspaper, while he concluded the article with the sentence "If even these do not convince you, at least the former editor-in-chief of the 30th anniversary of "Koha Jonë", Qamil Xhani, that made the newspaper available to the LSI party during the campaign, obviously with my permission, will". This sentence would then be deleted from the text by republishing the altered one.

is even greater. The print media, as well as the audiovisual media, must adhere to the principles of coverage by all parties.

#### IX.4. Online media

### IX.4.1. The news portals

The Electronic and Postal Communications Authority, or AKEP, is the competent regulatory authority for electronic communications, according to the provisions of Law no. 9918 of 19.5.2008 "On electronic communications in the Republic of Albania" AKEP manages the domains that are registered in the .al logo and under its domains, so this makes it even more difficult to monitor these portals, especially the journalistic ones, which are not registered in these domains.

AMA guarantees that the authorized electronic media are responsible in relation to the interests and public sensitivity, respect for the understanding and social coexistence of all individuals in the Republic of Albania.

Although there is no specific law on online media in the country, the constitutional principles of freedom of speech and of the press extend to the rights and restrictions of online media, as well as the implementation of the Journalism's Code of Ethics.

The growing influence of these new media has led to the government's unilateral attempt to control its content through an "anti-defamation" package. The amount of information published by the online media in real time increases the difficulty in tracing the source of the information, but the approval of this law and the increased competence of the Appeals Commission of the Audiovisual Media Authority to evaluate the content of online media publications and their fines, thereby bypassing the courts, would violate freedom of speech and also create a climate of self-censorship in them.

<sup>&</sup>lt;sup>688</sup> Law No. 9918 of 19.5.2008 n. 9918 "On electronic communications in the Republic of Albania" amended by law no. 102/2012, of 24.10.2012, no. 107/2018, of 20.12.2018, amended by law no. 92/2019 of 18.12.2019

<sup>&</sup>lt;sup>689</sup> The socialist government has made several attempts to regulate it, both through amendments to the "E-commerce" law and through a recent attempt to broaden the scope of the Audiovisual Media Authority on online media under the "anti-defamation" package.

This package was widely contested by both media representatives and the OSCE delegation, which asked the prime minister to look into it. The Albanian Parliament withdrew the law for review, even after the President's return to it in January 2020, pending the opinion of Venice, a request that was sent to him by the Council of Europe.

However, even after the publication of the Venice Commission's draft report according to which "the law is characterized by ambiguity and could have a deterrent effect on free speech, Prime Minister Rama in an October 2020 statement said that this law would be passed because he had been in consultation with the OSCE for about a year, and that would be included recommendations from the Venice Commission in it.

The objectivity of the information published on these portals, in addition to being part of political debates<sup>690</sup>, materialized at the request of the responsible authority AKEP, in closing one of the most popular news portals in the country<sup>691</sup>.

During a survey KRIIK noticed that several news portals sponsored on their Facebook pages, posts in which only one candidate from a particular party was promoted and the news on their page contained the same line<sup>692</sup>.

It is important to monitor political announcements on portals, such as audio and audiovisual media. KRIIK considers this regulation necessary to improve the transparency of the electoral subjects' finances, as well as to understand the monetary benefits of these media.

The recognition and inclusion of the concept of "online media", the transparency in their financing, the self-awareness of the people who are employed in these portals, on the journalistic codes of ethics, are aspects that would improve the functioning and content of information in these portals.

The competition of these portals for the number of clicks, but also the uncertainties in their funding, which often question the links with political entities, make the information in them often a controversial source.

# IX.4.2. The campaign on the social media platforms.

Social media, although not considered to be real media, has taken on a very important role in political developments. The high figures of the Facebook use in Albania make it a good asset for the use of this platform for electoral purposes<sup>693</sup>.

All political entities and their leaders or members have been active on Facebook with posts that have taken on a fully electoral character before and during the election campaign. The leaders of the main

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<sup>&</sup>lt;sup>690</sup> February 25, 2020, Edi Rama on Twitter "Unfortunately this country, in every natural difficulty or calamity or health emergency that arises, must also face its great misfortune of channels and news portals where ignorance, wickedness, laziness and gluttony of masquerade flourish that in these cases becomes inhumane".

September 17, 2020, Taulant Balla "I am convinced that Shkëlzen Berisha's newsportal, Syri.Net, or Sali Berisha's son-in-law's newsportal, Life is Not Fun, will have many reasons to make the news today and that the issue of the media was mentioned. Albania's need for transparency on media ownership is big. Who the owner is must be officially published? "Who are the journalists who write fake news?"

<sup>&</sup>lt;sup>691</sup> The General Directorate of State Police has asked AKEP to close the domains "joq.al", "jetaoshqef.al" and "joqalbania.com", claiming to have violated the requirements of the law n. 45/2019 "On civil protection", for the publication of fake news regarding the earthquake of November 26, 2019.

<sup>&</sup>lt;sup>692</sup> Egnatia News spent \$423 on Facebook to promote news about the Democratic Conviction party candidate.

Albeu.com spent \$641 on Facebook only promoting news with a negative context to the government. Berati.net spent about \$100 on Facebook promoting the Socialist Movement for Integration party candidate Ardit Cela.

<sup>&</sup>lt;sup>693</sup> Statistics from statista.com estimate that during the election campaign there were about 1,606,000 Facebook users in Albania.

parties, but not only, have a large number of followers<sup>694</sup> and the number of their posts, through videos, photos and various statuses, has increased significantly since the display of the election date, especially after the presentation of the programs.

Direct communication with the citizen has meant that political actors bypassed the traditional media filter, developing this communication through the "live" option offered by these platforms, which are then transmitted directly by electronic media, especially in informative events. On the other hand, this form of communication has potentially increased the opportunities for disinformation. Followers were offered only what was served by political actors, not allowing another critical point of view.

During the pre-election campaign, but also the official one, political parties have used one of its most important elements such as *memes* on these platforms. Posts with a satirical or derogatory character of the opponent's image through processed photos and videos were some of the forms of using the power of the image.

An important step taken by Facebook in this election period was the formalization of political advertising, while helping to calculate the real costs that electoral actors and political actors spend on these platforms during election campaigns<sup>695</sup>. At the start of this Facebook initiative, a series of election advertisements failed to identify the source of income. For this reason, the platform of this social network has limited the distribution by removing them from Facebook.

A problem with the use of these platforms was the campaign by third parties, through sites not directly linked to any party, at least in their description. These sites have consistently posted content that is similar or identical to that of the parties they supported.

The concerns about these posts were that they were sponsored, which is clear proof of the third-party campaign<sup>696</sup>.

Such sites were created shortly before the campaign started or changed the character of their previous content, with clear electoral intentions, raising questions about their funding. Sites identified by

<sup>&</sup>lt;sup>694</sup> The number of followers on the official websites of the leaders of the country's three main parties until 23 March 2021: Edi Rama 1,505,147 followers, Lulzim Basha 620,023 followers, Monika Kryemadhi 86,412 followers.

<sup>&</sup>lt;sup>695</sup> The electoral subjects and actors participating in the elections, or other Facebook pages that support these entities, and that publish electoral announcements, that is, which have the purpose of conducting the electoral campaign, from 11 March 2021, have been subject to the <u>regulation</u> that Facebook has implemented in Albania for political advertising. All election and political announcements in Albania must come from licensed advertisers, including the "Paid by" ad. Any advertiser who will create ads related to elections or politics and will target people in Albania must be authorized in the country he targets these ads and the payment for these ads must come from a user based in Albania. In the event that Facebook identifies an advertisement with electoral or political and social messages, which has not identified the source, then it should be removed from the platform.

<sup>&</sup>lt;sup>696</sup> For more information, see the Finance Section of the Election Campaign.

KRIIK as third-party campaigns stopped their posts shortly before or right after election day, clarifying that they were sites created for electoral purposes.

Social networks, although considered personal, have been used for public purposes, not only by party leaders, but also by any candidate for Member of Parliament in these elections. The promotion of infrastructural works, the posting of photos showing children next to the candidates for Member of Parliament, were some of the violations detected in this campaign.

The same practice of intensive posting was followed in the period of electoral silence, which was not respected at all on social platforms.

Almost all electoral subjects had paid ads on Facebook, which were active on the Saturday before election day, as well as on the election day itself. The non-consideration of these platforms as real media and their non-inclusion in the legal obligations, has meant that the candidates used them for political propaganda throughout the electoral period.

The proliferation and increased use of these platforms, for political purposes, requires a broad and in-depth discussion of their inclusion and regulation within a specific regulatory framework during the electoral campaign.

#### X. COMPLAINTS AND APPEALS

Complaints and appeals over electoral related issues shall be subject to administrative or judicial procedures.<sup>697</sup>. Parts of the Electoral Code, which deal with complaints, saw significant amendments during the reformation process in 2020. The amendments explicitly recognized the right of third parties in the electoral process to lodge a complaint<sup>698</sup>.

Appeals over decisions taken by the Commissioner and second level Commissions are lodged with the Complaint and Sanctions Commission (KAS). Appeals on KAS' decisions or the failure to come up with a decision within the legal deadlines are filed with the Electoral College, attached to the Tirana Appeals Court or the Administrative Court.

Electoral subjects, political parties or candidates, who haven't been permitted to register as electoral subjects and those subjects, who are entitled to accredit their observers, are entitled to lodge a complaint.

Narrowing down the number of subjects entitled to file a complaint over the decisions taken by election governing body to those subjects which have been registered as electoral subjects, makes electoral justice less effective. Limiting this right is justified with the existence of a legitimate interest by the plaintiff. Meanwhile, to uphold the importance of the electoral process for society as a whole, each individual has a legitimate interest in this process.

During the period covered by this report, appeals have been filed with KAS in relation to 34 decisions taken the Commissioner. KAS has decided<sup>699</sup> to change or rescind 17 of them<sup>700</sup>. Meanwhile, KAS has examined 64 complaints<sup>701</sup> out of total of 74 complaints<sup>702</sup>. The total number of verdicts issued by KAS was 113<sup>703</sup>, of which 34 were final after deliberating on the cases.

<sup>&</sup>lt;sup>697</sup> Administrative deliberation of complaints relating to electoral issues is regulated by Part 10 of the Electoral Code of the Republic of Albania. Meanwhile, the judicial examination is regulated by Part 11 of the Electoral Code.

<sup>&</sup>lt;sup>698</sup> The Electoral Code of the Republic of Albania, Article 124/1, "Administrative complaints by third parties".

<sup>&</sup>lt;sup>699</sup> Of which, nine verdicts relate to complaints over the electoral result, seven verdicts relate to sanctions against members of Regional Election Commissioners (KZAZ) with the same object of complaint.

<sup>&</sup>lt;sup>700</sup> For more, see Addendum M "Complaints".

<sup>&</sup>lt;sup>701</sup>21 motions have been filed and examined prior to election day and 43 motions were examined after election day.

<sup>&</sup>lt;sup>702</sup> KAS decided not to examine eight complaints due to missing elements with the form and content as prescribed by article 130 of the Electoral Code of the Republic of Albania. Two of the cases were dismissed because the plaintiffs failed to submit the relevant documents.

<sup>&</sup>lt;sup>703</sup> Of which 79 interim decisions (i.e., on joined cases, cases in which further criteria had to be met in order to be examined as complaints, etc.).

17 decisions<sup>704</sup> have been contested at the Electoral College<sup>705</sup>, which decided to fully modify a decision taken by KAS on this case, <sup>706</sup> while partially modifying the decision in three other cases.

It's worth noting that the voting of the Electoral College members in 17 out of 19 cases<sup>707</sup> has been unanimous. A verdict was also appealed and was deliberated by the First Instance Administrative Court in Tirana, which decided to partially modify KAS's verdict<sup>708</sup>.

Referring to the legal frame<sup>709</sup>, given the fact that many of the complaints filed by different subjects were the same, KAS has examined these complaints together. KAS applied this procedure in a total of 30 complaints<sup>710</sup>, for which 13 final decisions have been taken.

# X.1. Complaints and appeals prior to election day

# X.1.1 Complaints examined by KAS

On 18 January 2021, KAS held its first session and deliberated 24 complaints, which were filed prior to election date. KAS refused to deliberate on three of these cases<sup>711</sup>.

Some of the most important cases examined by KAS prior to election date were related to appeals lodged against decisions announced by the Commissioner for violations envisaged by Decision no. 9 of the Regulatory Commission for the use of state resources <sup>712</sup>, the number of candidates on the PD-

<sup>&</sup>lt;sup>704</sup> One of which being a decision "To refuse the deliberation of a case", <u>Decision No. 97, dated 29.06.2021</u> in relation to "Refusing to deliberate complaint no. 56 filed with the Central Election Commission on 28.06.2021.

<sup>&</sup>lt;sup>705</sup> In relation to decision no. 6, dated 16.02.2021 by KAS, the Electoral College announced that it doesn't have the necessary powers and the case was deliberated by the Administrative Court, which has partially overturned KAS' decision. <sup>706</sup> A case with the Socialist Party being the plaintiff. This party demanded "An examination of the request to register the list of candidates of the coalition led by the Democratic Party–Alliance for Change (PD-PR-PDIU-PAA-PBDNJ-PDK-LZHK-PLL-FRD-BLD-PBKD-PBD-PKD), for the 25 April 2021 parliamentary elections."

<sup>&</sup>lt;sup>707</sup> Four members voted in favor and one member voted against <u>decision no. 3 dated 29.03.2021</u> and <u>decision no. 8 dated 19.04.2021</u>.

<sup>&</sup>lt;sup>708</sup> For more, see Addendum M "Complaints".

<sup>&</sup>lt;sup>709</sup> <u>Decision no. 03 dated 06.11.2020</u>, Regulatory Commission, "On the approval of the regulation on the way sessions are held at the Complaints and Sanctions Commission", Article 19, section 1.

<sup>&</sup>lt;sup>710</sup>18 complaints (no. 33- no. 53) concerning the election result, for which a final decision has been taken on nine complaints; seven complaints (no. 25- no. 31) filed by members of some KZAZs in relation to penalties issues against them by the Commissioner and for which a final decision has been taken on two complaints; two complaints (no. 1 and no. 2) concerning decision no. 7 taken by the Commissioner on 14.01.2021, for which a final decision has only been taken on one case; three complaints (no. 8, no. 9 and no. 10) on the form and content of the ballot paper, for which a final decision was taken on one case.

<sup>&</sup>lt;sup>711</sup> Complaint no. 4 with Mrs. Leonora Hyso being the plaintiff. Complaint no. 13 with Alliance for the Theatre being the plaintiff and complaint no. 17 with Mr. Kastriot Gurra being the plaintiff.

<sup>&</sup>lt;sup>712</sup>Complaint no. 1 with Mr. Arben Qalliu being the plaintiff; Complaint no. 2 with the Socialist Movement for Integration being the plaintiff, Complaint no. 3 with Mr. Erion Veliaj being the plaintiff; Complaint no. 14 with Gentian Picari being the plaintiff.

AN coalition list<sup>713</sup>, the content of the ballot paper<sup>714</sup>, the allocation of public funds for electoral subjects<sup>715</sup>, the appointment of the electoral subject, which would propose the fourth member of Vote Counting Teams<sup>716</sup>, the registration of the list of candidates for the Alliance Coalition<sup>717</sup>, etc.<sup>718</sup>. and the decision of several KZAZs not to accredit the observers of several electoral subjects<sup>719</sup>.

Some of the abovementioned decisions overturned the Commissioner's decisions and in some cases, they created negative precedents, particularly with regards to the application of one of the novelties introduced with the latest amendments made to the Electoral Code, which has to do with the ban on the use of state resources in election campaigns, but also with the approval of the content of the ballot paper, concluding with a ballot paper made up of numbers and not names.

Also, looking at a broader picture beyond a process of mere decision making which only relates to a particular election, KAS' decisions set a precedent for its decision-making process in the future, not limiting these decisions with these particular elections. This separated KAS from the Central Election Commission, which, under the Electoral Code, can impose penalties for violations of the electoral code, something which KAS has never envisaged during its deliberations and the examination of cases.

In addition, these decisions also raise a question on the impartiality of this structure in the spirit of the June 5 Agreement for an institution which is supposed to be politically impartial. Decisions over these cases have been taken with a simple majority (3-2) and it's obvious that the political partiality of KAS' members has influenced their judgement and their decisions.

With regards to complaints relating to the Commissioner's decision on allocation of public funds for electoral subjects or the registration of the Alliance coalition's list of candidates, KAS' decisions reflected an accurate interpretation of the legal frame.

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<sup>&</sup>lt;sup>713</sup> Complaint No. 5 with the PD-AN coalition being the plaintiff. The plaintiff requested the Commissioner to decide on the number of candidates on this electoral subject's list of candidates. Decision no. 156, dated 18.03.2021.

Complaint No. 8 with the Socialist Party being the plaintiff, Complaint No. 9 with the Democratic Conviction party being the plaintiff and Complaint no. 10 with PD-AN coalition being the plaintiff. The plaintiffs requested the approval of the format and the content of the ballot paper. In these three complaints, which were examined jointly, the plaintiffs requested the identification of the candidates on the ballot paper, the orientation of the ballot paper and the logo of an electoral subject.

<sup>&</sup>lt;sup>715</sup> Complaint No. 7 with ABEOK being the plaintiff. In this case, the plaintiff asked the Commissioner to determine the amount of public funds allocated for electoral subjects. Decision no. 13, dated 30.03.2021.

<sup>&</sup>lt;sup>716</sup> Complaint No. 11 with PDIU party being the plaintiff. The plaintiff requested the appointment of those political parties which would propose the third and the fourth member of vote counting teams. Decision no. 193, dated 31.03.2021.

<sup>&</sup>lt;sup>717</sup> Complaint no. 6 with the Alliance Coalition being the plaintiff. The plaintiff appealed the Commissioner's decision not to register this coalition's list of candidates. Decision no. 165, dated 18.03. 2021.

<sup>&</sup>lt;sup>718</sup> Complaint no. 58 with the Democratic Party being the plaintiff. The complaint was not directly linked to the electoral process, but rather, to the decriminalization process.

<sup>&</sup>lt;sup>719</sup> Complaints no. 15, no. 16 and no 24. with the Democratic Conviction Party being the plaintiff. Complaints no. 18, no. 19, no. 20, no. 21, no. 22 and no. 23 with the New Democracy Alliance being the plaintiff.

When it comes to overturning KZAZs' decisions for the registration of observers accredited by political parties, KAS has used its discretion not to rely strictly on the legal provision and the legal deadline for the registration of domestic observers.

According to KRIIK (Coalition for Reforms, Integration and Consolidated Institutions), overall, the way KAS read the law avoided its spirit, which means that KAS focused on the letter of the law, while completely ignoring the norms that exist.

### X.1.2. Complaints deliberated by the Electoral College

Prior to election date, the Electoral College received eight appeals which related to decisions taken by KAS. In one of the cases, the College declared that it didn't have the necessary powers to deliberate on it and passed it on to the Tirana Administrative Court of First Instance<sup>720</sup>.

The Electoral College decided to dismiss three cases, to partially modify KAS decision in three cases and fully modify KAS' decision in one case.

### X.2. Complaints and appeals after election date

# X.2.1. Complaints deliberated by KAS

After the end of the voting process and the counting of votes at KAS, there were 53 complaints, but they can be grouped into five different types, because their object is the same. KAS decided not to deliberate seven of the cases<sup>721</sup>.

<sup>&</sup>lt;sup>720</sup> In its decision no. 2, dated 04.03.2021, the Judicial Electoral College decided to dismiss case no. 2 filed on 22.02.2021 with the Socialist Movement for Integration Party being the plaintiff, the Central Election Commission being the respondent and the mayor of Tirana being the third party. In its plaint, the plaintiff requested for the "Decision announced 16.02.2021 by the Complaints and Sanctions Commission to be changed. In its arguments, the plaintiff also specified the decision announced by the Judicial Electoral College for lack of powers.

<sup>&</sup>lt;sup>721</sup> Complaint no. 32 with Tasim Mehmeti being the plaintiff. Complaint no. 45 with ABEOK Coalition being the plaintiff. Complaint no. 47 with Mrs. Lediana Fratari being the plaintiff; Complaint no. 50 with Mr. Kostaq Papa being the plaintiff, Complaint No. 55 with the National Unity of Albanian Pensioners Party; Complaint no. 56 with ABEOK being the plaintiff. With regards to complaints no. 32 and 50, it was initially decided to request the plaintiffs to provide additional documents, but given that this was not done, the cases were dismissed and not examined.

The complaints included those lodged by members of several KZAZs, which had been fined by the Commissioner during the counting of votes<sup>722</sup>, complaints relating to electoral contestation<sup>723</sup>, the Commissioner's decision making<sup>724</sup> with regards to denouncements made for violations which relate to decision no. 9 of the Regulatory Commission, complaints<sup>725</sup> over administrative penalties issued by the Commissioner for 110 political parties, which had failed to fulfil their legal obligation of submitting their financial statements for 2020 and complaints<sup>726</sup> relating to decisions on the result of the post electoral auditing process, etc.<sup>727</sup>.

### X.2.1.1. Decisions regarding fines issued against some members of KZAZs

One day after election day, the Commissioner issued administrative penalties against members and secretaries of 17 KZAZs<sup>728</sup> arguing that despite the obligation set forth in the Electoral Code<sup>729</sup>, on April 26, 2021, by 2200 hrs., they had counted fewer than 50% of the Polling Stations of their jurisdiction.

Members of seven of these KZAZs<sup>730</sup>, appealed the Commissioner's decisions with KAS, which, after deliberating the complaints together decided<sup>731</sup> to overturn the Commissioner's decision and revoke the penalties issued against the members and the secretaries of the KZAZs who appealed the decision.

<sup>&</sup>lt;sup>722</sup> Complaint no. 25 with members of KZAZ no. 35 being the plaintiffs. Complaint no. 26 with members of KZAZ no. 22 being the plaintiffs. Complaint no. 27 with members of KZAZ no. 66 being the plaintiffs. Complaint no. 28 with members of KZAZ no. 38 being the plaintiffs. Complaint no. 29 with KZAZ no. 2 being the plaintiffs. Complaint no. 30 with members of KZAZ no. 20 being the plaintiffs and complaint no. 31 with members of KZAZ no. 21 being the plaintiffs.

<sup>&</sup>lt;sup>723</sup> Complaints no. 33, no. 34, no. 35, no. 46, no. 48, no. 49 with the Socialist Movement for Integration being the plaintiff. Complaints no. 36, no. 37, no. 38, no. 39, no. 40, no. 41, no. 42, no. 44 with the Democratic Party being the plaintiff and complaints no. 51 with Mr. Boiken Abazi being the plaintiff and no. 52 with Mr. Kreshnik Merxhani and no. 53 with Mr. Iljaz Shehu being the plaintiff.

<sup>&</sup>lt;sup>724</sup> Complaints no. 59, no. 60 and no. 61 filed with KAS by the "Civil Resistance" organization, Complaint no. 74 filed with KAS by "The Albanian Institute of Sciences" organization and Complaint no. 57 with Mr. Andi Derhemi being the plaintiff.

<sup>&</sup>lt;sup>725</sup> Complaints no. 62 to 73 filed with KAS by 19 political parties.

<sup>&</sup>lt;sup>726</sup> Complaints no. 75, no. 76 and complaint no. 1 filed in 2022 to appeal decision no. 470 taken by the State Election Commissioner on 02.12. 2021.

<sup>&</sup>lt;sup>727</sup> Complaint no. 58 with the Democratic Party being the plaintiff. The plaintiff contested decision no. 422 dated 02.07.2021 and announced by the State Election Commissioner "On the deliberation of the background checks carried out by the Prosecutor General on the mayor of Mallakastër".

<sup>&</sup>lt;sup>728</sup> KZAZ no. 20, KZAZ no. 66, KZAZ no. 21, KZAZ no. 22, KZAZ no. 24, KZAZ no. 69, KZAZ no. 70, KZAZ no. 2, KZAZ no. 29, KZAZ no. 34, KZAZ no. 35, KZAZ no. 37, KZAZ no. 38, KZAZ no. 39, KZAZ no. 64, KZAZ no. 41 and KZAZ no. 42.

<sup>&</sup>lt;sup>729</sup> Electoral Code of the Republic of Albania, Article 119, section 5, states that the counting of ballots continues without interruptions until all ballot boxes received by KZAZ are counted. KZAZ may decide to suspend the counting for reasons which do not depend on the electoral administration, and which prevent the normal counting process. Referring to article 122, section 1 of the Electoral Code of the Republic of Albania, which states that the summary table of the election result for the electoral administration area is extracted from KZAZ no later than 2200 hours on the following day of voting.

<sup>&</sup>lt;sup>730</sup> KZAZ no. 20, KZAZ no. 21, KZAZ no. 2, KZAZ no. 38, KZAZ no. 66, KZAZ no. 22 and KZAZ no. 35.

<sup>&</sup>lt;sup>731</sup> <u>Decision no. 55 dated 5.05.2021</u>, Complaints and Sanctions Committee "On the deliberation of complaints no. 27, no. 28, no. 29, no. 30 and 31".

Nonetheless, this encouraged the culture of impunity among commissioners and made the application of the law by them something relative.

# X.2.1.2. Decisions regarding the contesting of the final election result

Under the procedure, once the summary table for a particular constituency is approved with the decision by the Commissioner, an appeal can be lodged with KAS against the decision regarding that constituency.

During this procedure, there were 18 complaints lodged by 5 electoral subjects<sup>732</sup>, which did not agree with the electoral result in ten constituencies<sup>733</sup>. By joining these cases, which had the same object, KAS took nine final decisions with records to nine constituencies.

Given that the object and the claims made by the plaintiffs were the same, the decision for each constituency was the same, with some small exceptions, especially in the constituencies of Berat and Durres, where a recounting of votes was requested.

The results showed that KAS had a partial approach in the way it examined the cases. This body did not support the investigation of the facts and other circumstances, which would shed more light upon the claims that were made. The behavior shown by KAS members proposed by the majority was the same in almost every case which was examined. They had a tendency to dismiss the claims that were presented, but in some cases, also to ridicule their content.

#### X.2.1.3. Complaints over Decision no. 9 of the Regulatory Commission

KAS decided to overturn only one of the four decisions of the Commissioner with regards to complaints over the application of Decision No. 9 of the Regulatory Commission.

The Commissioner was asked to re-examine the three other cases, because according to KAS, there was a need for a more thorough investigation. All three cases are under examination by the Commissioner and there's still no final decision on them.

<sup>&</sup>lt;sup>732</sup> The Democratic Party contested the result in nine constituencies, the Socialist Movement for Integration in six constituencies and independent candidates Mr. Boiken Abazi, Mr. Kreshnik Merxhani and Mr. Iljaz Shehu contested the result in the respective constituencies where they ran.

<sup>&</sup>lt;sup>733</sup> In the end, KAS only examined complaints relating to nine constituencies, because the independent candidate, Mr. Iljaz Shehu withdrew his complaint in relation to the election result in the constituency of Lezhë, which he had previously contested.

# X.2.1.4. Decisions relating to penalties issued against political parties

Through the Commissioner's decisions<sup>734</sup>, the Central Election Commission for the first time penalized 110 political parties which had not fulfilled their legal obligation of submitting their annual financial statements to the Central Election Commission, including political parties which had fulfilled this deadline, but not within the legal deadline<sup>735</sup>. It's worth noting that this decision was a positive step to raise awareness among political parties about their obligations by putting an end to the culture of impunity in cases when the law is broken.

However, even in this case, after examining some of the complaints filed by political parties which were penalized, KAS overturned the Commissioner's decision.

# X.2.2. Complaints examined by the Electoral College

All of KAS' decisions on the contested result in nine constituencies were sent to the Electoral College, which in each case, unanimously upheld KAS' decisions.

In general, the stances taken by the college and KAS are similar and in some cases, this shows a partiality and use of discretion when addressing concerns or claims.

Decision no. 430 dated 22.07.2021, "On the submission of annual financial statements of political parties for 2020 and the applicable fines for failing to submit them".

<sup>&</sup>lt;sup>735</sup> For more, see part VIII "The financing of political parties".

#### XI. OTHER INSTITUTIONS WITH A ROLE IN THE ELECTION PROCESS.

# **XI.1. Ministry of Internal Affairs**

The Ministry of Internal Affairs is counted among the most important institutions regarding the election process, not only in the framework of guaranteeing public security and the welfare of the process overall, but also regarding drawing up and exacting the voters' lists.

Four days after the Republic President decreed the election date, on 10 September 2020, the Minister of Internal Affairs circulated the respective Instruction related to drafting the voters' lists<sup>736</sup>. Based on this Instruction, The Civil Status offices (CSO) in collaboration with the Municipalities undertook the process of voters' lists verification, detailing and cyclic publication, up to the final extract on 16 March 2021.

Besides this process, the Ministry of Internal Affairs undertook increased activities, through the Director of General Directorate of Civil Status (GDCS), to sensitize citizens to apply to renovate their Identification Documents, as there was a high number of citizens whose ID had expired.

A very important moment throughout all the election process is to send a written notice to the citizens regarding their polling station address.

To achieve this process, the legal framework appoints the municipalities with funds allocated by the Ministry of Internal Affairs. Similar to previous processes, also in the 25 April 2021 elections, the Ministry of Internal Affairs did not fully comply to the exigencies of the Electoral Code. Specifically, the Instruction does not provide for a reporting mechanism by the mayors regarding the progress of sending written notifications to the voters. Likewise, the approved written notification had no dedicated space to provide for the citizen's signature as required by the Electoral Code. The fund for the municipalities to achieve this process was allocated behind schedule and there was no mechanism to control its expenditure. Even after the process completion, the Ministry of Internal Affairs results having no official information regarding the process of sending written notice to the voters.

GDCS launched the process of updating or migrating the citizen's addresses to the National Register of Civil Status (NRCS) at December 2019. The Legal framework to its realization was never publicized by GDCS, regardless of continuous official requests by KRIIK. The only answer to these requests has been the verbal affirmation by officials of this directorate that there is an order by the Minister of Internal Affairs based on which the process is being carried out but without specifying the legal basis on which this order was taken and without making it available It has also been affirmed that the "Popullimi" project realized in 2016-2017 was carried out by the Electricity Distribution Operator (OSHEE) in collaboration with the Ministry of Internal Affairs and aimed to identify the citizens' real addresses, a process much debated in public for its lack of transparency and a series of other elements. This data was used to identify the citizens' addresses, making the necessary corrections at the National Register of Civil Status and questions arise for their administration and

<sup>&</sup>lt;sup>736</sup> Instruction no. 298, dated 10.09.2020, "On the procedures for drafting the voters' lists for Albania's Parliamentary Elections".

responsibility in the capacity of administrator, regarding the formal aspect of responsibility and competency.

Regardless the abovementioned situation, citizens who had not applied to the Civil Status Offices to update their address could vote on their previous election's voting centers, following the update of their addresses according to the "Popullimi" project data reflected already in the NRCS.

Regarding all of the above and referring to the verbal communication with the NRCS officials, it is concluded that the situation is unclear regarding the progress of generating and drafting the voters' list and identifying the addresses, referring to and working in parallel with two different databases of NRCS about citizens' addresses, which is contrary to the legal framework<sup>737</sup> and its provisions to automatically generate the voters' list from NRCS.

# XI.2. Prefectures.

In compliance to the legal framework<sup>738</sup> and in fulfilment of the given duties regarding the election process, prefects propose the facilities at regional level, which will serve as Ballot Counting Centers (BCC).

Based on KRIIK observers' ongoing communication with the 12 Prefectures<sup>739</sup>, it was concluded that three of them have failed to observe the legal time frame for submitting<sup>740</sup> their proposals on the locations that may serve as ballot counting centers.

# XI.3. Local self-government units

Municipalities, in the quality of Units of Local Governance, are involved in the election process by assigning voting centers to suitable settings according to the legal criteria within the respective territory, publishing voters' lists sending written notices to voters, as well as deciding about allowed spaces to display propagandistic materials in the course of the electoral campaign.

With regards to setting the voting centers addresses, the process, differently from the previous elections was conditioned by the Electoral Code changes related to dissolving AUs numbering less than 300 voters, a process realized throughout the publication of electoral extracts that was completed with the publication of the final voters' list.

<sup>&</sup>lt;sup>737</sup> RoA Electoral Code, Neni 47, "Compliance to NRCS".

<sup>738</sup> Law No. 107/2016, The Parliament of the Republic of Albania, "To the Regional Prefect".

<sup>&</sup>lt;sup>739</sup> Lezhë Region Prefect proposal submitted to the CEC by letter no. 171/3, dated 26.02.2021; Tiranë Region Prefect proposal submitted to the CEC by letter no. 268/3, dated 9 March 2021; Korçë Region Prefect proposal submitted to the CEC by letter no. 296/1, dated 18.03.2021)

<sup>&</sup>lt;sup>740</sup> RoA Electoral Code, Article 94 "Location and preparation of Vote Counting Centres", paragraph 1.

Publishing the extracts of the electoral components or voters' lists cyclically every 30 days starting from 6 October 2020 was accompanied by problematics regarding delayed publication or even not displaying any extract at all in public places<sup>741</sup>, as provided by the legal framework.

The written notification of voters turned out once more a process partially completed by the municipalities; it was beyond the legal deadlines even in those Municipalities and elements where it was completed<sup>742</sup>.

Reporting the progress of this process to CEC and the Ministry of Internal Affairs resulted once more a process mostly unfulfilled<sup>743</sup>.

Regarding the decision to display propagandistic materials, this was also found out to be an obligation only partially respected by some municipalities <sup>744</sup>.

Engagement of the local mayors in the electoral campaign, often as political leaders of Socialist Party in the respective regions, and also the engagement of local administration subordinate to these municipalities was notified with concern.

The abovementioned situation should undergo a holistic in-depth discussion. It also needs a complete and detailed legal regulation. This would secure the impartial function of the state institution and the correct legal institutional approach by the local governance institutions in continuity, especially throughout electoral campaigns. Once they are elected as First Citizens of their Municipalities Communities, Mayors cannot behave as political militants even regarding their public presence, let alone with regard to exercising their committed public functions and responsibilities, no matter that they are proposed by a political party.

#### XI.4. Police

State Police exercises its duties with regard to the elections in accordance with the provisions of the Electoral Code, completely impartial toward the electoral subjects, in accordance with Law 108/2014<sup>745</sup> "On State Police".

State Police carries out special importance duties throughout the electoral campaign, election day, ballot counting, and release of election outcome, guaranteeing the electoral process peaceful organization and administration, order, and peaceful voting development in the election day and during ballot counting.

The changes of the Electoral Code as per Law 101/2020 added to the duties and responsibilities of State Police during their activity in service to elections. Besides the obligation to secure the electoral

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<sup>&</sup>lt;sup>741</sup> See the "Registration of voters"/ "Cyclic publication of voters' lists" for more details.

<sup>&</sup>lt;sup>742</sup> See the "Registration of voters"/ "Written notification of voters" for more details.

<sup>&</sup>lt;sup>743</sup> Only six municipalities reported to CEC, and none did so to the Ministry of Internal Affairs.

<sup>&</sup>lt;sup>744</sup> See the "Electoral campaign"/ "Propagandistic materials" for more details.

<sup>&</sup>lt;sup>745</sup>Law No. 108/2014, The Parliament of the Republic of Albania "On State Police".

commissions premises, police were in charge of implementing the provisions of Article 79 of the Electoral Code regarding the use and display of propagandistic materials by the electoral subjects. The period of police engagement in the elections begins at least four months before the election day.

In view of defining the organization rules of Police functioning and its coordination with CEC, the Regulatory Committee approved Decision no. 12, dated 30.12.2020<sup>746</sup>.

In all Local Police Directorates, State Police officers, were trained in February and March 2021 regarding the role and duties of State Police at the elections of 25 April 2021.

Nationwide, State Police structures have evidenced and referred to the Special Anti-Corruption Structure, or according to competency, to the Prosecutor's Offices at the District Court, 57 criminal offences<sup>747</sup> transgressing on free elections and elections' democratic system as provided by the Criminal Code<sup>748</sup>. 52 of these criminal offences were referred by 12 local police structures at regional level<sup>749</sup> while 5 were referred by the General State Police Directorate. It is worth mentioning that the region with more offences referred to the Prosecutor's Office was Durrës, while Korçë had the least number.

Furthermore, State Police has been engaged continuously to performing controls in view of anti-covid measures implementation, as provided for by different ordinances issued by the Ministry of Health and Social Protection. One of them<sup>750</sup>, the most important during the electoral campaign was the ban on rallies of more than ten persons. Notwithstanding this ordinance, political parties rallied their supporters and followers in events and gatherings, the rallies violating these measures obviously visible, not only by terrain reporting but also by mediatic reporting and social media displays.

The attitude of State Police in view of implementing sanctions toward those in violation of these regulations was evasive and unequal to all political forces candidates or representatives organizing meetings in violations of these enforcements.

<sup>&</sup>lt;sup>746</sup>http://kqz.gov.al/wp-content/uploads/2021/02/Vendim Nr.012 201230 Per-miratimin-e-rregullave-te-veprimtarise-se-Policise-se-Shtetit-ne-sherbim-te-zgjedhjeve..pdfDecision No.\_12, dated 30.12.2020, "On approving the rules on state police activity during elections"

<sup>&</sup>lt;sup>747</sup> Specifically, references are made to criminal offenses provided for in the articles: Article 325 "Obstructing Electoral Subjects", Article 326 "Falsification of Election Material and Election Results", Article 327 "Violating voting secrecy", Article 328 "Active corruption in elections", Article 328/a "Using the public function for public or electoral activities", Article 328/b "Passive corruption in elections", Article 329 "Intimidation or Abuse against Participants in Election", Article 330 "Obstructing voters", Article 331/a "Obtaining or using the identification documents illegally", Article 248 "Abuse of office", Article 261 "Impeding the exercise of the right of expression, assembling or protest", Article 262 "Organizing or participating in illegal manifestations".

<sup>&</sup>lt;sup>748</sup> The Criminal Code of the Republic of Albania Chapter X, "Criminal offenses affecting free elections and the democratic system of elections".

Berat Region, five criminal offenses; Dibër Region, two criminal offenses; Durrës Region, seven criminal offenses; Elbasan Region, six criminal offenses; Fier Region, three criminal offenses; Gjirokastër Region, four criminal offenses; Korçë Region, one criminal offenses; Kukës Region, five criminal offenses; Lezhë Region, five criminal offenses; Shkodër Region, four criminal offenses; Vlorë Region, four criminal offenses; and Tiranë Region - six criminal offenses.

<sup>&</sup>lt;sup>750</sup>Order No. 633, dated 17.11.2020 of MoHSP "Prohibiting gatherings in open or closed spaces".

Seven MP candidates were sanctioned administratively by fines<sup>751</sup>: one Socialist party candidate, three candidates of the Democratic party, one candidate of the Socialist Movement for Integration party, a candidate of the New Movement party, and one independent candidate.

#### XI.5. Prosecutor's Office

Criminal offenses related to the election process are provided for in Chapter X of Criminal Code<sup>752</sup>, amended by variations approved in December 2020<sup>753</sup>. Likewise, Law No. 148/2020<sup>754</sup> determined the obligation of the General Prosecutor and the Head of the Special Prosecutor's Office, according to the respective jurisdiction, to provide information to CEC on the investigation of criminal offenses in the elections field, which does not affect the preservation of investigative secrecy according as provisioned by the Criminal Procedure Code.

In the previous electoral processes, in view of coordinating and collaboration, signing a preliminary agreement between the General Prosecutor's Office and the Central Election Committee has been proven as a positive practice, notwithstanding content limitations. There was no such agreement at this process, also for reason of the abovementioned legal amendments.

In fulfilment of constitutional and legal liabilities for the progress of the electoral processes, the General Prosecutor issued a new instruction<sup>755</sup> including the legal amendments to the Prosecutor's Office Law, regarding the relation of this institution to CEC, which was sent to all the district prosecutor's offices.

Criminal offenses related to active and passive corruption in the elections<sup>756</sup> fall now under the investigative scope of Special Anti-Corruption Structure, SPAK.

<sup>&</sup>lt;sup>751</sup> Mr. Blendi Klosi (SP) punished by administrative measure fine by the Berat Police Local Directorate; Mr. Arjan Galdini (LRE) punished by administrative measure fine by the Tiranë Police Local Directorate; Mr. Endrit Brahimllari (SMI) punished by administrative measure fine by the Berat Police Local Directorate; Mr. Elton Debreshi (independent candidate) punished by administrative measure fine by the Dibër Police Local Directorate; Mr. Edmond Spaho (DP) punished by administrative measure fine by the Korçë Police Local Directorate; Mr. Belind Këlliçi (DP) punished by administrative measure fine by the Tiranë Police Local Directorate; Ms. Soela Myrtollari (DP) punished by administrative measure fine by the Korçë Police Local Directorate.

<sup>752</sup> Criminal Code of the Republic of Albania, Article 325/a

<sup>&</sup>lt;sup>753</sup> <u>Law No.</u> 146/2020, dated 17.12.2020 "On some insertions and amendments to the Law No. 7895, dated 27.1.1995, "Criminal Code of the Republic of Albania", as amended <sup>753</sup>.

<sup>&</sup>lt;sup>754</sup> 148/2020, dated 17.12.2020<a href="https://qbz.gov.al/eli/ligj/2020/12/17/148/380d80b8-056f-4c4e-b6a9-5c7f8e7996e7">https://qbz.gov.al/eli/ligj/2020/12/17/148/380d80b8-056f-4c4e-b6a9-5c7f8e7996e7</a> "On some Addenda to Law No. 97/2016 "On the organization and functioning of Prosecutor's Office in the Republic of Albania:

<sup>&</sup>lt;sup>755</sup> Instruction no. 2 dated 31.03. 2021 "On some amendments and addenda to general instruction no.3, dt. 21.06.2019 "On administrative and procedural measures in the prosecutor's offices with general jurisdiction in the pre- and post-election period".

<sup>&</sup>lt;sup>756</sup> The Criminal Code of the Republic of Albania article 328, article 328/a, and article 328/b.

158 notifications for criminal offenses in the election field<sup>757</sup> have been registered at the General Prosecutor's Office that has proceeded by registering criminal proceedings for 82 notifications<sup>758</sup> criminally prosecuting 10 persons, of whom two have been given the security measure of imprisonment. more than half of these notification, 73 such, have been registered before the election day and the rest during the election day, the ballot counting process or later. As for the scope of these criminal proceedings, except for those falling under SPAK's competency, most criminal charges are filed for the criminal offenses "Using the public function", "Abuse of office regarding election legal acts", "Obstructing voters", etc.,

147 materials (criminal charges, references or various information) were submitted to SPAK regarding the electoral process of April 25, 2021<sup>759</sup>, 57 criminal proceedings were registered<sup>760</sup>, of which 38 criminal proceedings are currently under investigation by SPAK<sup>761</sup>.

Verifying candidates forwarded by CEC remains a very important part of Prosecutor's office's work regarding electoral processes. The prosecutor's office has completed the verification of only nine candidates out of 30. The Prosecutor's office should pay prime attention to this process in view of achieving the decriminalization law scope, to stop in the shortest time presenting to voters candidates with problems regarding purity of figure or even their duty exercise if elected.

### XI.6. Courts

#### XI.6.1. Constitutional Court

XI.6.1.1. Appeal of the Republican Party to the Constitutional Court concerning the Order the Minister of Health

The situation imposed by the C-19 pandemic and the Decision no. 4856 of November 16th 2020<sup>762</sup> of the Technical Committee of Experts as well as the Order of Minister of Health on prohibition of

Health and Social Protection "Prohibition of gatherings in closed or open places".

<sup>&</sup>lt;sup>757</sup> out of which 91 notifications were filed directly at the Prosecutor's Office (70 notifications by political subjects and candidates, 18 notifications by state institutions and 3 notifications by citizens), 31 notifications were referred by the judicial police, and 36 notifications were referred by SPAK.

<sup>&</sup>lt;sup>758</sup> As about the rest, 23 notifications have been forwarded to SPAK, for 23 it has been decided to stop the criminal proceeding continuance, and the rest are in the process of preliminary verification.

<sup>&</sup>lt;sup>759</sup> 89 criminal charges were submitted by political subjects (80 criminal charges by DP, seven criminal charges by SMI, 1 criminal charges by SP and 1 criminal charges by NDS); 23 references by the Judicial Police; 8 materials by the Judicial District Prosecutor's offices; 20 information from the President of the Republic; 6 criminal charges by citizens and 1 case ex-officio.

<sup>&</sup>lt;sup>760</sup> About the rest of the materials, it is decided to cease criminal proceedings for 14 criminal charges, 49 cases have been sent to the competence of the judicial district prosecutor's offices, 19 cases have been sent to the state police for further verification and 8 cases are still in evaluation process by the attorneys.

<sup>&</sup>lt;sup>761</sup> SPAK has declared non-competence for 15 criminal proceedings and has sent them to the Judicial District Prosecutor's Offices. For four other proceedings have been decided the merger for reasons of sharing the same scope.

<sup>&</sup>lt;sup>762</sup> Order No. 633, dated 17.11.2020, Ministry of

gatherings of more than ten people and prohibition of gatherings of political party meetings<sup>763</sup>abridge the right to assemble.

The Republican Party appealed to the Constitutional Court the Order of the Minister of Health. On March 9th, The Constitutional Court ruled that the order should specify a date within which it would be reviewed, as it could not be effective indefinitally (until a second order as in its original formulation)<sup>764</sup>.

The Republican Party's appeal argued that the Minister's Order was opposing to the Albanian Constitution, which guarantees freedom of assembly and expression, thus creating a disadvantage for the opposition parties against the ruling majority, which enjoys higher visibility.

The Constitutional Court ruled that the Order, in fact, prohibited political parties' gatherings of more than ten people, and not all political parties' gatherings (as claimed by the complainant - the Republican Party). Essentially, the Constitutional Court based its decision only on the fact that the Minister's Order did not indicate a deadline within which it had to be reviewed and did not address, in the final decision, the constitutionality of the prohibition of gatherings, as such<sup>765</sup>.

Pursuant to the decision of the Constitutional Court, the Ministry of Health issued an order on March 11th extending the effect of the Order no. 633 until March 25th<sup>766</sup>. Meanwhile, in its meeting of March 24th, the Technical Committee decided that the restrictive measures remain in force for another two weeks (until April 7th, 2021)<sup>767</sup>.

XI.6.1.2. Lawsuit filed by the Democratic Obedience Party and the Albanian Democratic Movement on point 3 of Article 163 of the Electoral Code

The Democratic Obedience and the Albanian Democratic Movement appealed in the Constitutional Court the specific changes determining the reshuffling of candidates on the list only if they break the quotient. On June 30 2021<sup>768</sup>, the Constitutional Court overturned point 3 of the Article 163 of the Electoral Code, as incompatible with the Constitution.

764 Decision no. 11, dated 09.3.2021, the Constitutional Court "On behalf of the Republic of Albania".

<sup>763</sup> Ibidem.

<sup>&</sup>lt;sup>765</sup> It is worth noting here that on March 31, 2020, in fulfillment of the obligations deriving from the ratification of the European Convention on Human Rights, the Albanian State notified with a verbal note to the General Secretariat of the Council of Europe for an exception of temporary fulfillment by Albania of the obligations arising from Articles 8 and 11 of the Convention (right to privacy and right to assembly). The exemption from fulfilling these obligations was in force until June 23, 2020, the date on which the Albanian State notified the Secretariat that it was withdrawing from the exception and that these two rights will be fully respected in the future. There is no second notification of the Albanian State for non-fulfillment of the obligations of article 11, which brings that the Order of the Minister of Health is not in coherence with the position of the Albanian representation in the Council of Europe.

<sup>&</sup>lt;sup>766</sup> Decision no. 158, dated 11.3.2021 of the Minister of Health.

<sup>&</sup>lt;sup>767</sup> It is worth noting that in the amendment made to the same order on 20 May 2021 (Order No. 183/4, dated 20 May 2021) the phrase that specified the exact date by which the order was in force was replaced again with the phrase "Up to a second order" (point 1 of the Order). The Ministry of Health has therefore issued an Order, which is clearly contrary to a Decision of the Constitutional Court.

<sup>&</sup>lt;sup>768</sup> Constitutional Court of the Republic of Albania Decision no. 28 dated 30.06.2021.

According to the Court, when determining the quotient, it should not be put restrictions to a greater extent than necessary to achieve the objectives, to respect the right to vote and the principle of equality of voting. Consequently, the Court considers that estimating the quotient, regarding its numerical value, defined in point 3 of Article 163 of the Electoral Code, as one of the criteria that affects the distribution of mandates, violates the right to vote, since it does not meet the criterion of proportionality. Therefore, the Court decided to partially accept the recommendation and to abrogate point 3 of Article 163 of the Electoral Code, as incompatible with the Constitution.

XI.6.1.3. Complaint of the Association of Municipalities on the unconstitutionality of the electoral process of June 30, 2019

On November 4, 2021, the Constitutional Court rejected the request of the Association of Municipalities, which had requested and, as a result, the unconstitutional ascertainment of the election of the members of these bodies, as well as the verification of the constitutionality of the activity of the party "Democratic Persuasion" in relation to its registration in court and the elections of June 30, 2019.

The court rejected the request after assessing that in relation to the first request of the request under review the case is not part of the constitutional jurisdiction, while in relation to the second request the applicant is not legitimized to initiate the constitutional trial.

#### XI.6.2. The Administrative Court

The First Instance Administrative Court of Tirana deliberated on two cases which related to the 25 April 2021 elections. In both cases, the Socialist Movement for Integration Party was the plaintiff, while one of them was sent to this court by the Electoral College.

It's worth noting that the First Instance Administrative Court of Tirana was quick to examine these cases and its decisions were upheld, despite the fact that an appeal was lodged for one of them with the second instance administrative court.

One of the cases examined by the First Instance Administrative Court of Tirana was the complaint lodged by the Socialist Movement for Integration<sup>769</sup> against KAS<sup>770</sup> decision to revoke the administrative penalty issued by the Commissioner against the mayor of Tirana. The Electoral College

<sup>&</sup>lt;sup>769</sup> Object of the lawsuit "Amendment of the decision dated 16.02.2021 of the Appeals and Sanctions Commission (KAS) in the Central Election Commission."

<sup>&</sup>lt;sup>770</sup> Decision no. 06, dated 16.02.2021, the Complaints and Sanctions Commission, "On the review of the appeal request no.03, dated 11.02.2021, of Mr. Erion Veliaj against the decision of the State Election Commissioner no. 46, dated 09.02.2021".

said it had no powers to examine this case and decided to forward the case to the First Instance Administrative Court of Tirana.

In its decision on 7 July 2021, this Administrative Court decided to partially accept the complaint and partially modify KAS'<sup>771</sup> decision.

Based on this final decision, the mayor of Tirana was issued an administrative penalty for failing to report this institution's public activity. 772

In its arguments, according to KRIIK (Coalition for Reforms, Integration and Consolidated Institutions), this court has limited itself in the way it has interpreted the law, by only accepting the fact that the performed activity was a public activity and that it should have been reported on the Central Election Commission's page. However, the court considered the documents which were distributed (house permits) to be simple documents without any legal value.

On 21 April 2021, the Socialist Movement for Integration asked the Administrative Court to suspend the application of Order No. 219 dated 19.04.2021 and issued by the Ministry of Health and Social Protection "For the self-isolation of people entering the Republic of Albania from the Republic of North Macedonia and Greece". In its arguments published on 23 April 2021, the Administrative Court declared that it had no powers to examine the case and decided to forward the case to the Administrative Court of Appeal in Tirana, considering this to be the competent court, from a functional point of view, to handle the case. On April 24, the latter decided to reject SMI's motion considering the complaint to be outside its judicial jurisdiction. According to this court, the complaint was under the jurisdiction of the Constitutional Court, given the normative nature of the act which was contested and the constitutional nature of the rights which were supposedly violated by this act.

KRIIK maintains that the electoral subject should have exerted its right to lodge a complaint with the Constitutional Court, despite the fact that the time available for any decision by the Constitutional Court would not lead to a suspension of the Order and as a result, it would not grant the right to vote to people who came into the country from Greece and North Macedonia to exert this right.

The deliberation of this case by the Constitutional Court would help clarify claims made by electoral subjects and the eventual use of this decision in future complaints. In addition, the Constitutional Court would set the necessary precedents with regards to the violation and restriction of rights, in particular the right to vote in similar conditions or in conditions of a pandemic.

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<sup>&</sup>lt;sup>771</sup> The court changed only point 1 of the KAS decision "On point 1 of the SEC decision no. 46/2021, the abolition of the administrative sanction with a fine against Mr. Erion Veliaj, Mayor of Tirana, in the amount of 35,000 (thirty-five thousand) ALL for violation of article 92 points 1, 2 and 3, of law no. 10019, dated 29.12.2008, "The Electoral Code of the Republic of Albania", amended for non-reporting of public activities ".

<sup>&</sup>lt;sup>772</sup> Law no. 49, 03.05.2012 "On administrative courts and adjudication of administrative disputes" Official Gazette 16.05.2012, Article 45.

#### XI.6.3. District Courts

The role of district courts in parliamentary elections, in contrast to local government elections, only relates to decisions concerning changes on the extract of electoral components upon the request of voters following the publication of the final voters list and the deliberation of motions and complaints lodged by citizens or forwarded by the Prosecutor's Office.

22 district courts have examined or are in the process of examining three criminal cases which relate to the 25 April 2021 elections, envisaged by chapter X of the Criminal Code. <sup>773</sup>

Courts have also examined the motions filed by 271 citizens for changes or corrections to the voters list<sup>774</sup>.

#### XII. OBSERVERS

The law provides for<sup>775</sup> the right of electoral subjects and foreign or domestic organizations to appoint observers to the electoral process. The observers are entitled to observe without hindrance all aspects of the preparation and conduct of elections and all the phases of the electoral process, to present written complaints to the electoral commissions regarding any noted irregularity, and to look at or examine the documentation or materials of the electoral process

The CEC approved a new<sup>776</sup> Regulation regarding the accreditation procedures and observation rules for observers and it accredited a large number of nonpolitical observers belonging to Albanian and foreign actors to the Assembly Elections at 25 April 2021. CEC accredited a total of 2,274 nonpartisan observers, of whom 248 were long-term observers<sup>777</sup>, 2,026 short term observers<sup>778</sup>, and 1,199 media

<sup>&</sup>lt;sup>773</sup> The Court of the Puka Judicial District has taken a decision on the criminal case with the object "Active Corruption in Elections" provided by Article 328 of the Criminal Code, criminal proceedings initiated by the Prosecution. This court has declared substantive incompetence and the case has been appealed to the Shkodra Court of Appeal.

The Court of the Durrës Judicial District has registered a criminal case with the object "Voting more than once" provided by Article 327 / a / 2 of the Criminal Code. The case is still pending.

The Court of the Judicial District of Dibër, has registered and imposed the security measure of arrest in prison for three persons for 1 criminal case with the object "Active corruption in elections" and "Use of public office for political or electoral actions". Following this decision, the case materials were transferred to the Special Court of First Instance for Corruption and Organized Crime.

<sup>&</sup>lt;sup>774</sup> For more see the section "Voter Registration".

<sup>&</sup>lt;sup>775</sup> RoA Electoral Code, Article 6, "The right to appoint observers".

<sup>&</sup>lt;sup>776</sup> Instruction no. 02, dated 02.02.2021, State Election Commissioner, "On the accreditation procedures and rules regarding election observation by non-governmental and foreign organizations, international organisations, foreign states representatives, media, and electoral subjects."

Out of whom, 202 were representatives of Albanian organisations and 46 - of international missions.

<sup>&</sup>lt;sup>778</sup> Out of whom, 215 observers from the international organisms, such as embassies and international organisations, and 1811 representatives of Albanian organisations.

representatives. Beside the domestic organizations, the electoral process was observed by to international observation missions, OSBE/ODHIR<sup>779</sup> and ENEMO<sup>780</sup>.

Overall, KRIIK observers have had no serious obstacles accessing the information needed from the CEAZs, notwithstanding sporadic cases of lack of knowledge regarding the legal framework by the election commissions members, regarding the observers' rights and obligations in relation to them.

The Electoral Code stipulates that the political parties' observers or those belonging to the independent candidates are accredited by the CEAZs, within the legal terms defined by law<sup>781</sup>. On account of non-complying to the legal terms, 19 CEAZs<sup>782</sup> refrained from registering the observers from 3 political parties<sup>783</sup>, which deposited complaints at CSC. The latter decided to overturn the CEAZs' decision bringing about the registration of these electoral subjects' observers, notwithstanding their legal terms non-compliance.

Reviewing the CEAZs' decisions shows about 9,108 accredited political observers<sup>784</sup> besides different political forces representatives being present at the counting process.

Throughout the counting process, as KRIIK proved by its respective public statements, there was an increased presence of political observers at the vote counting centers. Physical confrontation between different political forces followers occurred in several cases<sup>785</sup>. This caused the State Election Commissioner to issue a public declaration and by the Ruling no. 322, dated 26.04.2021<sup>786</sup> to overrule all Tirana Municipality no. 30 CEAZ's decisions that had accredited political subjects' observers. This served to normalize the situation in this CEAZ, but in all other CEAZs, the increased presence of political observers continued.

Other than that, it is worth noting that the above situation at the vote-counting and voting centers was in flagrant violation to all regulations decided with regards to the Covid-19 pandemic situation, exposing to health risks all individuals present there.

The resulting situation and overpopulation was the direct responsibility of State Police representatives, which allowed persons irregularly accredited by the respective election commissions to enter in the vote counting centers.

Kolonjë, CEAZ no. 76, Përmet, CEAZ no. 78 Memaliaj, CEAZ no. 81 Libohovë, CEAZ no. 87 Selenicë.

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<sup>779</sup> ODIHR OPEN ELECTIONS OBSERVATION MISSION TO ALBANIA.

<sup>780</sup> ENEMO International Election Observation Mission, Parliamentary Elections in Albania 2021.

<sup>&</sup>lt;sup>781</sup> instruction no. 02, dated 02.02.2021, State Election Commissioner, article 9 "Terms of observers' mandate", point 3. <sup>782</sup> CEAZ no. 17 Klos, CEAZ no. 21, 22, 24 Durrës, CEAZ no. 25 Shijak, CEAZ no. 33, 34 Tiranë, CEAZ no. 52, Librazhd, CEAZ no. 60, Patos, CEAZ no. 62, Mallakastër, CEAZ no. 65 and 68 Berat, CEAZ no. 73 and 74, Korça, CEAZ no. 75

<sup>&</sup>lt;sup>783</sup> New Democracy Alliance Party, Democratic Conviction Party, Movement for Change Party.

<sup>&</sup>lt;sup>784</sup> We have to emphasize that this number corresponds to decisions from 31 CEAZs only, as the rest took no decision or their decisions were not published or deposited at the CEC.

<sup>&</sup>lt;sup>785</sup> See "Progress of counting process" for more information.

<sup>&</sup>lt;sup>786</sup> Ruling no. 322, dated 26.04.2021, State Election Commissioner "On overruling all observer accreditation decisions at the CEAZ no. 30's vote-counting centers, Tirana County."

#### XIII. WOMEN'S PARTICIPATION

Direct and active women's participation in public and political life is a key instrument to consolidate the democratic system. To encourage gender equality in the Electoral Code, <sup>787</sup> gender quota has been set to improve women's participation in the Assembly, local governance, and election administration.

The legal framework determinates that at least one out of every three candidates should belong to the underrepresented gender, thus setting a women's number minimum limit, though not a maximum limit of their representation, leaving open the option to submit lists comprised only of women.

# XIII.1. Women's participation in the candidate lists

Because of the legal amendments in the Electoral Code, in July 2020 <sup>788</sup>the of women candidates' number in the multinamed lists of the electoral subjects was guaranteed. There were 732 women and girls (39,8%) out of 1.841 deputy candidates (5 of whom were independent) registered in CEC<sup>789</sup>. Meanwhile, in the previous elections this figure was respectively 40.8% in 2017 and 38.5% in 2013. A slightly upward trend is noted in the Socialist Party and Democratic Party lists, compared to the previous two parliamentary elections.<sup>790</sup>.

The Assembly elected on 25 April 2021 has forty-six women deputies, or 32.8%. This representation level was 27.9% in the Assembly elected in 2017 and 17.9% in the one elected in 2013. Only two out of 17 competing political parties have a woman chairperson

Most distressing is that notwithstanding the parties' legal obligation to respect the gender quota<sup>791</sup> sanctioning them by refusing the multinamed list when it is not completed, some subject's lists were turned back for revision by the CEC<sup>792</sup> also for non-complying to this obligation.

<sup>&</sup>lt;sup>787</sup> Electoral Code of the Republic of Albania, Article 29 "Composition of the CEAZ" and Article 67 "List of parties candidates and parties' coalitions".

<sup>&</sup>lt;sup>788</sup> Law no. 101/2020, dated 23.07.2020.

<sup>&</sup>lt;sup>789</sup> From a total of 153 candidates for every subject, there were women:

Socialist Party 60 women candidates, 39.22%; Socialist Movement for Integration Party 61 women candidates, 39.87%; Coalition Democratic Party - Alliance for Change 51 women candidates, 33.33%; New Movement Party 75 women candidates, 49.02%; Thurje Initiative Party 67 women candidates, 43.79%; Movement for Change Party 68 women candidates, 44.44%; Social Democratic Party 63 women candidates, 41.18%; Albanian Democratic Movement Party 61 women candidates, 39.87%; Democratic Conviction Party 58 women candidates, 37.91%; ABEOK Coalition 59 women candidates, 38.56%; National Front Party 55 women candidates, 35.95%; New Democracy Alliance Party 56 women candidates, 36.60%.

<sup>&</sup>lt;sup>790</sup> SP had 24.9% women candidates in 2013, 35.4% in 2017, and 39% in 2021. DP had 29.3% women candidates in 2013, 20.1% in 2017, and 33% in 2021. SMI had 34.2% women candidates in 2013, 42.5% in 2017, and 39.9% in 2021. <sup>791</sup> Electoral Code of the Republic of Albania, Article 175 "Sanction for non-compliance with the gender quota".

<sup>&</sup>lt;sup>792</sup> Socialist Party, National Front Party, Democratic Conviction Party, Social Democratic Party, Democratic Party - Alliance for Change Coalition.

# XIII.2. Women participation in the electoral administration

Regarding the main institutional and judicial bodies related to the electoral process, it is noted that 5 out of 8 members in the Electoral College are women, while there are only two Regulatory Commission women members in the CEC Commissions and none in CSC.

Regarding the second and third level electoral administration, women were better represented in the second level (Zonal Election Administration Commissions), than at the third level (Voting Center Commissions). The law acknowledges<sup>793</sup> the obligation to fulfil the 30% gender quota at the Zonal Election Administration Commissions to the two main parties only, SP and DP.

Though 31.4% of the total CEAZs' membership were women<sup>794</sup>, this quota was not complied with by all political parties entitled to propose CEAZ members<sup>795</sup>. Even this representation to the minimal level of the legal obligations resulted much incomplete in the leading levels. Only a total of 33% of CEAZ women were chairpersons, deputy chairpersons or secretaries<sup>796</sup>.

## XIII.3. Gender issue in the electoral campaign

it is difficult to classify the importance given to gender representation in political parties' programs, and the resulting importance given by them to this matter in their governing vision, as there were no real electoral programs published by the election participating political parties. Besides, the engagement to increase women representation is considered indispensable, as an issue that should originate at the political parties' structures.

Throughout public communication, election participating<sup>797</sup> political parties issued verbal promises to support women by increasing their employment and representation to all sectors; nonetheless, gender issues remained overall marginalized by all election participating parties during the campaign.

Incidents toward women during public discussions were not missing during the electoral campaign. The Socialist Party Chairman at the same time Prime Minister of Albania, during a public

<sup>&</sup>lt;sup>793</sup> According to the Electoral Code of the Republic of Albania, Article 29, point 1, letter ç "30 percent of the members proposed respectively by the largest party of the majority and by the largest party of the opposition, at a national level, must be from each gender."

<sup>&</sup>lt;sup>794</sup> 231 women out of 736 members of the 92 CEAZs.

<sup>&</sup>lt;sup>795</sup> The Socialist Party had 130 women out of a total of 335 members (38.8%); The Democratic Party had 76 women out of a total of 276 members (27.5%); The Socialist Movement for Integration had 13 women out of a total of 92 members (14.1%); The Social Democratic Party had 12 women out of a total of 33 members (36.4%).

<sup>&</sup>lt;sup>796</sup> Only 15 out of 92 CEAZs had a woman chairman; 28 CEAZs had a woman deputy chairman, and 34 CEAZs had a woman secretary.

<sup>&</sup>lt;sup>797</sup> The Socialist Movement for Integration Party included women as an integral part of its action plan in the publication of its electoral program; Socialist Party and Democratic Party articulated only verbally regarding increasing women representation, mainly at meetings of their leaders with women, not addressing the issue substantially.

meeting/communication to announce the Socialist Party candidates on 10 March 2020, used an intimidating language<sup>798</sup> toward a Democratic Party woman candidate.

Women candidates were meagerly covered in newscasts, highlighting the continuity of the issues regarding women participation in the political life.

#### XIV. PERSONS WITH DISABILITIES

The Constitution of the Republic of Albania sanctions the right to elect and be elected to all Albanian citizens, including persons with disabilities, except in cases when persons are exempted from this right<sup>799</sup> after being declared mentally incompetent by a final court decision. This prohibition is in violation of the Convention on the Rights of Persons with Disabilities<sup>800</sup>.

Albania has signed the Convention on the Rights of Persons with Disabilities (CRPD)<sup>801</sup> in 2009 and ratified it in 2013, but not its Optional Protocol<sup>802</sup>. Despite this, and several amendments of the Electoral Code to guarantee the right to vote to the citizens with disabilities, little has been done in concrete terms to guarantee that these people are fully integrated, including the guarantee of their political freedoms and rights. The electoral code provides their right to vote through an assistant<sup>803</sup>.

Considering that the electoral contestants participating in the elections of April 25 did not have proper and published platforms, it is difficult to define the role of persons with disabilities in their government agendas.

During the electoral campaign, the problems of the Persons with Disabilities (PWD) were only partially touched upon during discussions. Only one subject, Democratic Party – Alliance for Change held a meeting<sup>804</sup> with representatives of organizations working with persons with disabilities, after which they declared that they had signed a cooperation agreement that was not made public. In most cases, these individuals are considered in the policymaking as parts of all vulnerable groups.

<sup>&</sup>lt;sup>798</sup> https://www.facebook.com/watch/live/?v=135019718451028&ref=watch\_permalink\_26th minute.

<sup>&</sup>lt;sup>799</sup> The Constitution of the Republic of Albania, Chapter III, "Political Rights and Freedoms", Article 45, paragraph 2.

<sup>&</sup>lt;sup>800</sup> Communication No. 4/2011 on 2013 of the Committee on the Rights of Persons with Disabilities, , paragraph 9.4. "Article 29 does not provide for any reasonable restriction or exception for any group of persons with disabilities. Therefore, an exclusion of the right to vote on the basis of a perceived or actual psychosocial or intellectual disability, including a restriction pursuant to an individualized assessment, constitutes discrimination on the basis of disability, within the meaning of article 2 of the Convention".

<sup>801</sup> Convention on the Rights of Persons with Disabilities.

<sup>802</sup> Optional Protocol to the Convention on the Rights of Persons with Disabilities.

<sup>&</sup>lt;sup>803</sup> Electoral Code of the Republic of Albania, Article 108, "Voters who cannot vote themselves".

<sup>804 &</sup>lt;u>BASHA SIGNS A COOPERATION AGREEMENT</u> WITH THE ASSOCIATION OF PERSONS WITH DISABILITIES.

It is positively evaluated the publication of educational ads<sup>805</sup> by CEC in sign language for deaf persons.

In Albania, there are no official and correct data regarding the number of persons with disabilities. According to the data of State Social Services, up to April 2021, the number of persons who are officially recognized as having disabilities is some 71,433, divided into 12,064 persons with visual impairment, 6,299 para/tetraplegics, and 53,080 with physical and mental disabilities<sup>806</sup>.

According to an official communication of KRIIK in 61 Municipalities in Albania during November – December 2020, there are 8,887 persons with visual impairment in 48 municipalities and 47,052 persons with disabilities.

According to a Central Election Commission Report in 45 municipalities, 807 there are 42,331 electors with disabilities, 35,995 persons with physical or mental disabilities, and 6,336 blind persons.

The process of identifying the number of Persons with Disabilities "should be simple coordination between the municipalities and CEC, considering that municipalities have the data. However, municipalities have been negligent<sup>808</sup> in submitting data to CEC, causing an unclear situation regarding the guarantee of necessary conditions to vote for persons with disabilities.

Better coordination between institutions is needed to ensure full preliminary information and then ensure the necessary conditions in every polling station, in the territory where a citizen with disabilities is registered, so as to facilitate their voting process.

The Regulatory Commission through the Guideline<sup>809</sup> of defining the rules for the establishment of polling stations defined that their premises should be on the ground floor of buildings, which was not fully implemented in practice, considering that a significant number of polling stations were located on the first floor of buildings.

In addition, the municipalities were responsible for the creation of the necessary conditions in the pooling stations where persons with disabilities would vote, however, according to KRIIK's observation it resulted that only 33% of the polling stations were accessible by this group of individuals, whereas the others were non-accessible or partially accessible.

<sup>805</sup> http://kqz.gov.al/spote/

<sup>806</sup> Beneficiaries of Persons with Disabilities March-April 2021

<sup>&</sup>lt;sup>807</sup> 16 Municipalities have not fulfilled their obligation to report the number of persons with disabilities to the CEC: Shkodër Municipality, Malësi e Madhe Municipality, Vau i Dejës Municipality, Tropojë Municipality, Has Municipality, Vorë Municipality, Kavajë Municipality, Cërrik Municipality, Divjakë Municipality, Maliq Municipality, Kolonjë Municipality, Përmet Municipality, Memaliaj Municipality, Vlorë Municipality, Delvinë Municipality, Sarandë Municipality.

<sup>808</sup> In the same place.

<sup>&</sup>lt;sup>809</sup> <u>Guideline no. 1 date 5.12.2021</u> "Definition of rules for the establishment and notification of the location of polling stations and preparation of the map of the local government unit for the elections".

Despite the positive steps forward regarding the participation of citizens with disabilities in the electoral procedures, more amendments are needed to guarantee the rights of this group of individuals, not only the right to vote but other rights too.

It is assessed as an immediate need, the draft of a preliminary database of the Persons with Disabilities, to facilitate the process of adapting the polling stations with ramps and Braille voting templates.

Law excluding the right to participate in elections to citizens who have been declared mentally incompetent needs to be reviewed, as an element that is in violation of the Convention on the Rights of Persons with Disabilities.

#### XV. NATIONAL MINORITIES

Persons belonging to national minorities in Albania exercise their rights and enjoy the freedoms guaranteed by a specific law<sup>810</sup>. For the purposes of this Law, national minorities in the Republic of Albania are the Greek, Macedonian, Aromanian, Roma, Egyptian, Montenegrin, Bosnian, Serbian and Bulgarian minorities<sup>811</sup>.

In local self-government units where persons belonging to national minorities account for more than 20 percent of the total population of this unit, they are entitled to receive information, in addition to the Albanian, also in their language, over the development of the electoral process.

The Central Election Committee in the framework of the information of national minorities who live in the territory of the Republic of Albania and enjoy the right to vote prepares informative ads and leaflets related to the voting procedure and the acts which constitute an electoral offense.

One political party that participated in these elections as part of the Democratic Party – Alliance for Change coalition, is a representative of the national minorities, Party Union for Human Rights (PUHR).

Apart from that, the platforms of the political parties, at least the ones that became public or can be considered as such, had no parts dedicated to the national minorities.

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<sup>&</sup>lt;sup>810</sup> Law 96/2017 "On the protection of national minorities", approved on 13.10 2017 and published in the Official Gazette no. 196 date 09.11.2017.

<sup>811</sup> The same Law, Article 3 "Definitions", paragraph 2.

#### XVI. ELECTION DAY AND VOTE COUNTING

KRIIK engaged 360 stationary observers who followed the opening, voting, and closing processes at 360 polling stations across the country selected based on a probability sampling. The observation of 360 polling stations chosen randomly guarantees the generalization of the findings with a margin of error of  $\pm 5\%$ , at 95% confidence interval. In addition, through groups of mobile observers, the situation around polling stations and the voting process in some 900 polling station was observed. If the former focused on all the technical elements of the process, throughout the election day in the polling stations where they were based, the latter mostly focused on the situation outside the polling stations and visited polling stations that were considered problematic<sup>812</sup>.

In addition to the above, there was a stationary observer in each CEAZ who followed CEAZ's activity throughout election day. These observers also performed monitoring visits at the CEAZs during Friday and Saturday, while CEAZs were getting ready and distributing election material for the commissions of the polling stations.

The vote-counting process in all BCCs of the country was followed continuously with stationary observers, until the end of the process.

# XVI.1. CEAZ's activity before election day

Most of the CEAZs convened almost the entire Friday, except for CEAZ no. 2. In four CEAZs it was observed an absence of members on Friday's meeting.

Almost all CEAZs reported having received the election material from the Central Election Commission by Friday, except for CEAZ no. 28 which got them on Saturday. Five CEAZs reported a lack of election materials sent by the CEC on Friday.

Five CEAZs reported not having constituted vote-counting groups until Friday<sup>813</sup>, in violation of the legal provisions.

On Saturday, all CEAZs convened and submitted election materials to the respective polling stations. The distribution of election materials from the Commissions of Elections Administration Zones to the polling stations was done with delays beyond the legal provisions in a considerable number of CEAZs (some 40%). One of the causes of delays was the lack of technical operators for the use of the EID devices or the cameras in the polling station. Another cause frequently mentioned for the delay in distributing materials was the delays of state police officers, without whom they could not start

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<sup>&</sup>lt;sup>812</sup> The mobile observers also followed the technical procedures in the polling stations they visited, however, their findings are technically incomparable to the stationary observers, who followed the process during the whole day. This is due to the fact that mobile observers followed these procedures only in short time frames (they spent approximately 30 minutes in each polling station).

<sup>813</sup> CEAZ no. 16, 35, 83, 84 and 85.

procedures of election-materials distribution<sup>814</sup>. In general, the process of submitting election materials to the commissions of the polling stations was done without problems<sup>815</sup>.

### XVI.2. Voting process

The harsh political rhetoric and conflicts that accompanied the electoral campaign were not spread on the election day, which was held without incidents or serious problems. The voting process was quiet and was procedurally administered well, except for the problems with the Electronic Identification Device reported in a number of polling stations. Procedural violations observed are thought to not have had a negative and fundamental impact on the process. A big concern remains the illegal and improper influencing of the voters near the polling stations, in line with the indications of the electoral campaign for the organized bodies which influenced votes.

Family voting and photographing of voted ballots were issues registered in a considerably high number of Polling stations. What was more concerning, was the tolerance of the commissioners in the Polling stations towards such issues, especially the photographing of voted ballots. Regarding the latter, in a considerable number of cases observed the commissioners did not notify the State Police, even though they had identified the electors who had photographed their voted ballot, however they only marked the ballot as invalid.

In many Polling stations, it was difficult or impossible for the electors with disabilities, to exercise their right to vote, with this issue remaining unaddressed even in these elections. The Polling stations Commissioners did not pay attention to the implementation of legal provisions regarding the assistance of those persons, or other persons that sought assistance during the voting process. This behavior bypassed the legal provision for the filing of a personal statement by the elector who assists the other elector, allowing one person to assist more than one elector.

These issues highlight the need for the professional training of the polling stations commissions, awareness-raising campaigns, and proactive education of the specifically targeted demographic groups.

A proactive approach should be also taken regarding the guaranteeing of a quieter situation without influencing electors on the election day, not only within the polling stations but also near them. Such proactive measures should be combined with prevention measures regarding vote control during the period before the elections.

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<sup>&</sup>lt;sup>814</sup> CEAZ 26, Vlora Municipality sent an official letter to CEC and the state police regarding the delay of arrival of the police officers, however, there was no official response.

<sup>&</sup>lt;sup>815</sup> At CEAZs no. 27, 37, 41, 42, 50, 60 and 83 observers reported long queues and mess during the election material submission process.

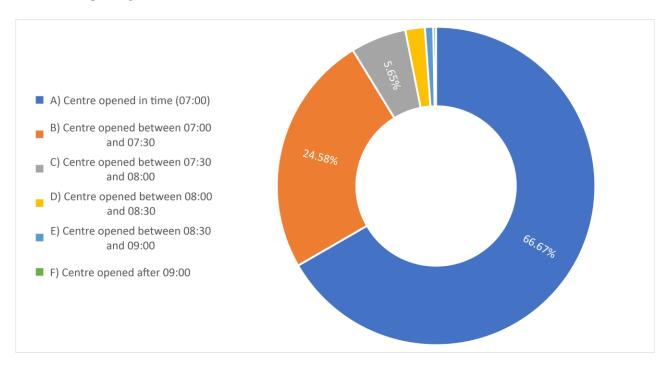
### XVI.2.1. Opening procedures

KRIIK observers monitored the opening procedures of 354 polling stations out of a sample of 360. For various reasons<sup>816</sup>; six observers were not in time to observe the opening procedures.

The polling stations' opening process was delayed beyond the legal deadlines, in a number of cases due to difficulties in turning on the electronic identification devices (EID). In 4.8% of the polling stations, different problems were recorded<sup>817</sup> with the EID functioning during the opening procedures.

Only in 66.67% of the polling stations, the voting process started in time (07:00). Most of the polling stations opened with less than half an hour delay (24.58% of the total opened between 07:00 and 07:30) and 8.76% opened with over half an hour delay. In more than half of the polling stations that opened with a delay (50.89%), there were electors waiting in line to vote at the moment of the opening of the polling station.

*Chart 1 – Opening time* 



There was a complete presence of commissioners in the polling stations in the opening time (seven commissioners) in most of the polling stations (80.23%). 10.45% opened with an attendance of 6 members, whereas the others opened with an attendance of five or four members. All polling stations completed the procedures with at least the minimal number of commissioners provided by law (four members).

<sup>&</sup>lt;sup>816</sup> In general, they had difficulty in finding the polling station.

<sup>817</sup> Operators that did not show up, difficulty in turning on the device, etc.

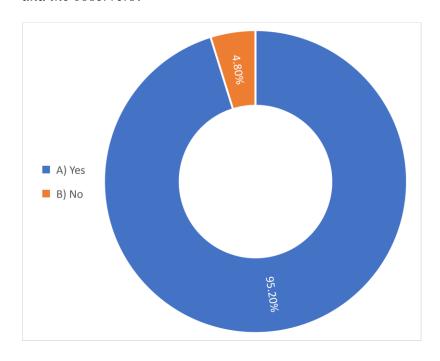
7 members
6 members
5 members
4 members
5.65%
80.23%
3.67%

Chart 2 – Presence of polling station commission members during the opening procedures

In almost all polling stations, the observers assessed that the organization of the polling station guarantees the secrecy of the ballot, with the exception of four polling stations.

Ballot boxes were closed in the presence of members of the commissions of the polling stations and the observers in all polling stations. One of the biggest problems during the opening process in a considerable number of polling stations was the difficulty in turning on the Electronic Identification Device. In 4.8% of the polling stations, EID was not turned on and consequently, the report of the opening of the polling station was not printed during the opening procedures. This brought delays in a considerable number of polling stations.

Chart 3 – Was EID turned on in the presence of all members of the commission of the polling station and the observers?



Almost all polling stations were equipped with the necessary materials to begin the voting process. Only in 1.13% of the cases, there was a lack of material at the opening moment<sup>818</sup>. The respective CEAZs equipped the polling stations with the missing materials, enabling the continuity of the process.

The standard procedures during the opening of the Polling stations (polling station) were strictly applied in almost all polling stations. The opening procedures were appreciated by the observers as "very good" in 66.1% of the polling stations, as "good" in 28.25% of the cases and as "problematic" in 5.65% of the cases. In no polling station the opening procedures were assessed as "very problematic".

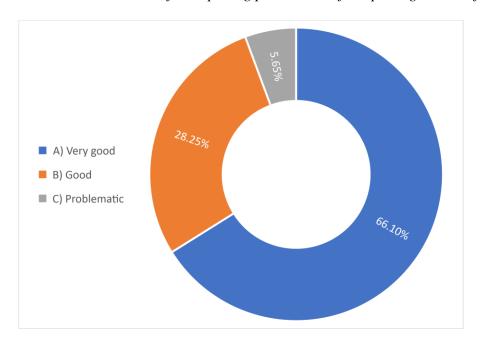


Chart 4 – Assessment of the opening procedures of the polling stations from the observers

# XVI.2.2. Voting procedures

During the voting process, similarly to the moment of the opening of the polling stations, most of the commissioners must be present so the process continues. Compared to the opening moment of the polling stations, it was noted that the number of polling stations operating with a full number of commissioners in the voting process increased by 9%. As a result, in 89.44% of Polling stations, commissions worked with seven members<sup>819</sup>.

<sup>818</sup> Ink for marking in one VC, Records in two VCs and envelopes with election documentation in one VC.

<sup>&</sup>lt;sup>819</sup> In 20 polling stations work was done with sex members, 16 worked with 5 members and only two polling stations had four members. In no polling station did they work with a number of members under the legal minimum (four members).

It resulted that the inclusion of women in the third level of electoral administration even in this electoral process was problematic. In 22.22% of the commissions, there was no woman member, in 25.56% there was only one woman, in 22.22% there were two women members and in 17.5% of the cases, there were three women members. Meanwhile, in 12.5% of the Commissions of the third level, the majority was comprised of women. These figures indicate an improvement compared to the Parliamentary Elections of 2017<sup>820</sup>, nevertheless, there are way behind the aspirations of gender equality.

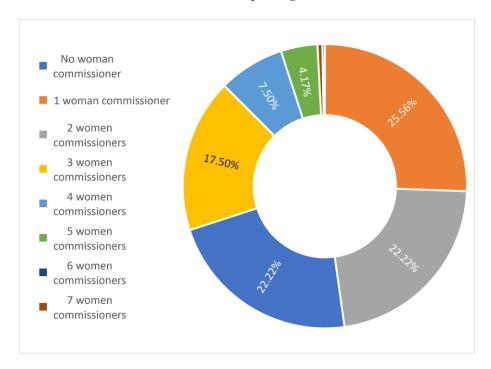


Chart 5 – Women commissioners in polling stations

The presence of unauthorized persons within polling stations continued to be an issue noticed in a relatively high number of polling stations. The number of Polling stations where unauthorized persons were noticed for at least one moment was 5% 821.

KRIIK observers assessed that in 5.83% of the polling stations, the position of the polling place did not allow all commissioners and observers to have a clear view of the actions the elector was performing behind it<sup>822</sup>. Whereas in 1.67% of the polling stations, observers assessed that the position of the polling place did not guarantee vote secrecy.

<sup>820</sup> In only 22.7% the members of the commissions of the polling stations were women.

<sup>&</sup>lt;sup>821</sup> In 14 of the cases observed, the unauthorized persons within the VCs were identified as representatives of political forces and in four cases the observers could not identify what they represented.

<sup>&</sup>lt;sup>822</sup> The protective screen behind which electors vote, the polling place, should be placed in such a position which can be visible from all the members of the commission and observers, so they can see the actions of the elector behind it. This is important to identifying the photographing of the voted ballot or other manipulation of forms of the electoral result.

Another concern regarding the infrastructure and organization of the polling station was the non-placement of the lists of posters with the numbers of the candidates, the posters which explained the voting procedures and the list of electors in 4.72% of the polling stations. It was especially concerning the non-placement of posters with the numbers of the candidates. Considering the composition of the ballot with numbers and not names, this did not give electors the possibility to be properly informed in these polling stations so they could make a last-minute choice regarding their preferred candidate.

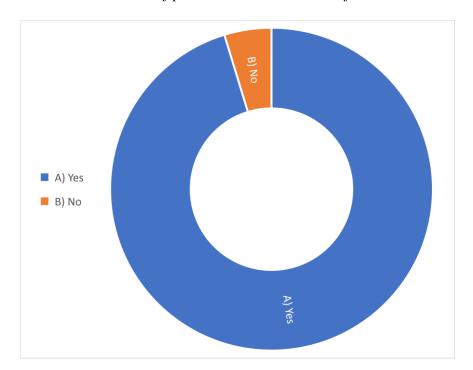


Chart 6 – Placement of posters with the numbers of the candidates in the polling stations

The formal procedures of the voting process were strictly respected in most of the polling stations, with deviations in a small number of polling stations<sup>823</sup>.

Violations noticed in a considerable number of polling stations were related to the use of mobile phones within polling stations, which was observed in 5% of polling stations, while in 3.89% of the cases, persons were observed holding their mobile phones in the polling place.

Other procedural violations observed were related to the respect of procedures by the electors who asked for assistance during the voting process<sup>824</sup>. A violation observed in a relatively high number of

<sup>&</sup>lt;sup>823</sup> E.g.: allowing electors to vote without checking if they had been marked first (1.11% of VCs) or without presenting a valid identification document (0.28% of VCs); failure to mark voters with a special vote before casting their ballot (2.22% of VCs) or attempts by the electors to vote outside the polling place (0.56% of polling stations).

<sup>&</sup>lt;sup>824</sup> This is a right electors enjoy; however, it is limited in three circumstances. The person that aids should be an elector in that polling station, a person cannot assist more than one elector even when they are asked for assistance, the elector who is being assisted and the assistant fill in a statement and their personal information is written down. The commissioner members of the polling station, in any case, are forbidden from providing assistance to vote.

cases was the failure to complete the respective statement the persons who aided electors in need of assistance, observed in 4.72% of the polling stations, whereas in 2.22% of the polling stations it was observed that several persons helped more than one elector to vote. There was a drastic decrease of assistance provided to persons with disabilities by the commissioners of the polling stations, compared to the Parliamentary elections of 2017; in only 0.83% of the polling stations, commissioners were observed providing assistance.

Family voting and group voting remained concerning issues, even though they dropped considerably compared to the Parliamentary elections of 2017. Attempts for family or group voting were observed in 11.67% of the polling stations<sup>825</sup>.

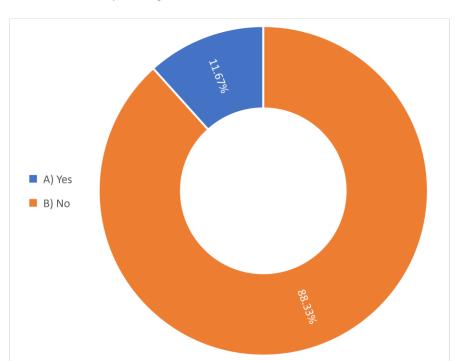


Chart 7 – Family voting

The photographing of the voted ballot by the electors remains concerning<sup>826</sup>, as it was observed in 1.94% of the polling stations (at least one case). In 5 polling stations where this issue was noticed, the commission members wrote down the personal information of these electors and in two cases they only declared the vote as invalid.

<sup>825</sup> In the Parliamentary Elections of 2017, it was observed in almost 22% of the polling stations.

<sup>&</sup>lt;sup>826</sup> If the members of the Commission in the Polling station notice that the elector photographs their voted ballot, they should stop the electors from casting the vote in the ballot boxes, they should keep down the personal information of the elector and notify police on the case.

During the Election Day, intervention, or exercise of pressure on the electors or the commissioners of the polling stations as well as attempts to influence the will of the electors or use of propaganda, near or within the Polling stations were observed.

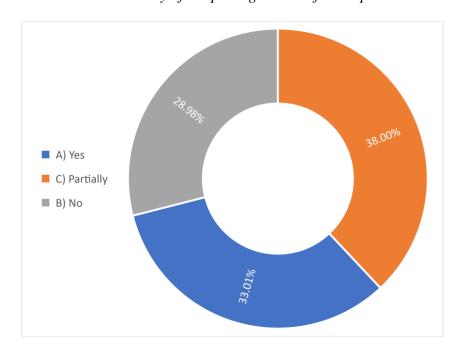
In 1.11% of the Polling stations, it was observed at least a case of persons interfering in the work of the commission of the polling station. In all observed cases, persons interfering in the work of the commission were representatives of political parties, and in a few cases, they were civil servants.

Electoral propaganda cases or attempts to influence electors' will were observed within Polling stations in 0.83% of the cases, and near such premises in 1.94% of the cases.

Another problem, observed in only one polling station, but is worth mentioning is commissioners of a polling station exceeding their competencies. In the polling station no. 4327 (Dropull Municipality), commissioners claimed that an elector had entered Albania through Greece just a few days ago and as a result, they did not have the right to vote because they had broken the self-isolation rules. The commission blocked the polling station for some 45 minutes and in the end, they decided not to allow the elector to vote. This is a clear case of polling station commissioners exceeding their competencies and abusing citizens' rights to vote.

Observers assessed the lack of infrastructural elements, which made it difficult for persons with disabilities to exercise their right to vote. The infrastructure of the Polling stations made the access of persons with disabilities, and independent voting impossible in 28.98% of the polling stations, very difficult in 38% of the polling stations. Only 33.01% of the polling stations were assessed by the observers as accessible for persons with physical disabilities.

Chart 8 – Accessibility of the polling stations for the persons with disabilities



Electors with visual impairment that headed to the polling stations received assistance from other electors to vote in almost all cases observed. Only in three cases (out of 100 observed), the electors voted totally independently, using the ballot written in the *Braille* alphabet.

The observers assessed the voting process as a whole at the end of their observation referring to four dimensions, each of which was assessed with four alternatives, from very good to very problematic. The general atmosphere of the voting process was assessed as "very good" from 69.17% of the observers and as "good" from 30.56% of them. In only two polling stations, the atmosphere was "problematic", and in none was the atmosphere "very problematic".

The application of voting procedures from the commissioners was assessed as "very good" by 69.17% of the observers and as "good" by 28.89% of the observers<sup>827</sup>. The knowledge of voting rules from the electors was assessed as "very good" by 33.15% of the observers and as "good" by 57.1% of them<sup>828</sup>. The qualification of the commissioners in the Polling stations was assessed as "very good" by 55.56% of the observers and as "good" by 41.39% of them<sup>829</sup>.

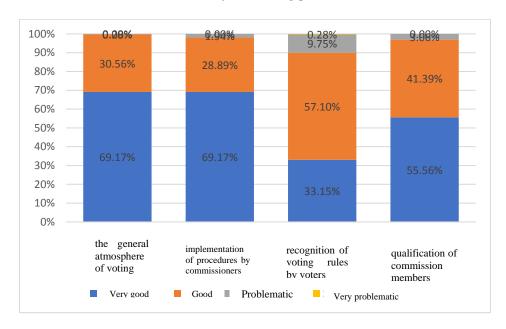


Chart 9 – General assessment of the voting process

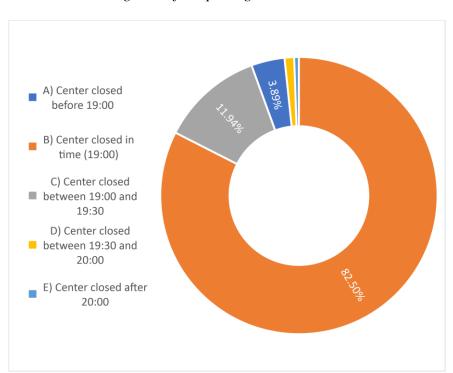
<sup>&</sup>lt;sup>827</sup> In 1.94% of the polling stations, the application of procedures by the commissioners is assessed as "problematic" and in no VC it is assessed as "very problematic".

<sup>&</sup>lt;sup>828</sup> In 9.75% of the polling stations the knowledge of voting rules by the electors is assessed as "problematic" and in only one case it is assessed as "very problematic".

<sup>&</sup>lt;sup>829</sup> In 3.06% of the polling stations the commissioners' qualification is assessed as "problematic" and in none as "very problematic".

# XVI.2.3. Closing of polling stations

82.5% of the polling stations closed according to the legal time (19:00), 11.94% of them closed between 19:00 to 19:30, and 1.67% of them closed after 19:30<sup>830</sup>. In only 1.94% of polling stations, there were electors who waited to vote after 19:00.



*Chart 10 – Closing time of the polling station* 

In general, the closing procedures in the polling stations and the administration of electoral materials were respected strictly in all polling stations except a few ones. In general, the procedural violations were related to negligence in the counting of the ballots used (3.3% of polling stations) or damaged (2 polling stations). In 2.5% of the polling stations, the number of electors who voted did not appear in the EID device, according to the procedures.

In all polling stations, all commissioners agreed with the counting result and the decisions taken by the commission of the polling station were reflected in the closing records of the polling stations.

<sup>830 3.89%</sup> of the polling stations closed before 19:00

The submission of election material to the ballot counting centers was strictly applied in all polling stations, however, in some polling stations, there were minor delays related to the vehicle that would transport the material.

At the end of the observation process, the observers assessed the process in general. In 71.94% of the polling stations, the observes assessed the closing procedures as "very good", 26.94% as "good" and 1.11% as "problematic". In no polling station, were the closing procedures assessed as "very problematic".

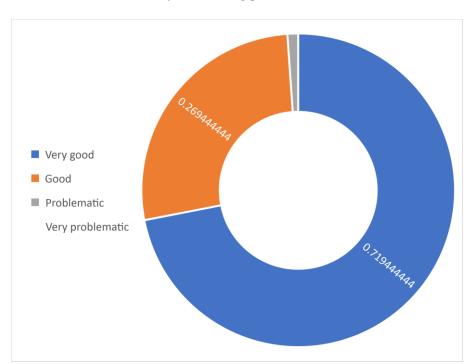


Chart 11 – Assessment of the closing procedures

### XVI.3. Vote counting

# XVI.3.1. Receiving election materials

The legal obligation of the political balance of the groups formed by CEAZ to receive election materials was met in all Ballot Counting Centers. Receival of election material was done relatively quickly and without any problems worth mentioning. Nevertheless, it was observed that 41.3% of CEAZs (38) created long waiting lines during the process.

### XVI.3.2. Counting process

Unlike the voting process, the ballot counting was accompanied by tension, dragging and suspensions in a considerable number of BCCs, especially during the counting of the preferential votes of the candidates. The administration of the counting process was not characterized by the same level of efficiency and transparency as the voting one.

KRIIK observed with concern that despite the clear position of the State Election Commissioner, his decision-making and continuous calls for the process to proceed without interruptions, but also the calls of election observation organizations such as KRIIK, even in these elections the implementing will of the commissioners towards the law and the hierarchy of institutions came second, finalizing the ballot counting and emergence of results from CEAZs with unjustifiable delays.

What was even more concerning was the fact that counting preferential votes did not get the right attention. This was observed not only through the ballot counting process but was a stand throughout the creation and development of the electoral process, especially during the electoral campaign.

A big problem during the ballot counting process remains the presence of unauthorized persons in the surrounding premises of the BCCs or within them. Non-hold of ID card lanyards by most people attending the ballot counting centers made it difficult to identify who they were representing. KRIIK noted in some BCCs, observers holding the handwritten identification documents, without the seal of the CEAZ, which raises doubts over the factiousness of these documents. In 38% of the CEAZs, police forces were called at least once to set order within the BCC during the ballot counting process. In many of them, they were called in more than one time<sup>831</sup>.

Another issue observed in a number of CEAZs is the interference of observers in the work of ballot counting groups by loudly expressing their concerns towards the tellers. It was clear, that most of the observers from the political parties had no idea regarding the procedures that should be followed in case of claims or complaints related to the work of the tellers.

As a result of the high presence of unauthorized persons in BCCs and the tense situation, violent incidents occurred, such as in the case in the CEAZ no. 30 in Tirana where there was a conflict and physical confrontation between observers and tellers on the night of April 26; or near CEAZ no. 38, again in Tirana. State police intervened to resolve the conflict in all cases.

Observers noted problems during the ballot counting process which decreased the transparency of the process. One of the problems, observed in previous processes too, is the passing of the ballots in front of the camera very quickly. Such a thing made it difficult to clearly see the sign that the elector had made to the ballot, which is extremely problematic in the case of preferential votes. Another problem was the absence of a political entity (independent candidate of Tirana District, Abazi) in the counting report of CEAZ no. 38.

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<sup>831</sup> In CEAZ no. 9, Bajram Curri Municipality, CEAZ no. 75 Këlcyrë Municipality and CEAZ no. 86 Himara Municipality.

The extremely high number of invalid ballots in these elections, which in practice they are equivalent to some seven seats, is a great problem. Referring to the post-electoral observation Report of CEC<sup>832</sup>, some 66% of the invalid votes were declared as such because in the ballot paper there were votes for two political bodies, or one political body, and a candidate of another entity. Even though the first irregularity was up to a certain point present in previous elections, it became a huge issue in these elections. The reasons behind this issue might be the citizen's misunderstanding due to candidates' individual campaigns (placement of numbers, the electoral entity, and the candidate in the list with promotional materials), but also a possible change of the vote during the counting process by the tellers. Such a case was made public to the media, during the counting process. It is still unclear up to what extent this issue has occurred due to citizens' misinformation or a potential change to the ballot paper made during the counting process. In the meantime, the second irregularity comes as a result of the new electoral system, and the composition of the ballot paper. If you deduct from the total of invalid votes of the two abovementioned categories (some 5,450 invalid votes out of 8,252 invalid votes in 519 polling stations where election materials were observed by CEC), the percentage of invalid votes goes down to 1.7%, closer to the norm of invalid votes in previous elections, but still some 70% higher compared to the last parliamentary elections.

If on a district level, the distribution of invalid votes is almost equal between different districts, on the municipal level there are great differences<sup>833</sup>. The Municipality with the fewest invalid votes is Himara, with 2.11% of invalid votes (again, the number is considerably higher than the average of previous elections, which is around 1%). Meanwhile, the municipality with the most invalid votes is Bulqiza with 8.84%, a figure which is extremely high, even when compared with the national average of these elections.

A general assessment shows that the level of implementation of the Election Code and CEC Guidelines from CEAZ during the ballot counting process was assessed as "very good" by observers in 66.7% of the CEAZs, as "good" in 32.1% of them, as "problematic" in 1.2% of them. Reasons for the problematic assessment were quoted the lack of knowledge on the legislation requirements by the commissioners, their consultation over the procedures with unauthorized persons, the chaos in the BCCs, and the lack of transparency during the voting and decision-making of CEAZs.

The level of qualification of the members of CEAZs was assessed as "very good" in 61.5% of the CEAZs, and as "good" in 35.9% of them. In 2.6% of the CEAZs, the qualification level was assessed as problematic.

In the meantime, the qualification level of the members of the ballot counting groups was assessed as "very good" in 55.1% of CEAZs, as "good" in 41%, and as problematic in 3.9%.

<sup>&</sup>lt;sup>832</sup> Report on key findings on the observation process of election materials used by the election commission in the Parliamentary elections of 25.04.2021.

<sup>&</sup>lt;sup>833</sup> Look at Appendix L for the distribution of invalid ballots according to municipalities and the deviation of their number by the national average.

#### XVII. POST ELECTION AUDIT

# XVII.1. Legal framework

After the legal changes to the Electoral Code<sup>834</sup> in July 2020, for the first time on the electoral process, the process of subsequent examination of ballot papers and election material was applied in Albania.

The post-election auditing consisted in the examination of ballot papers, election material inside the respective boxes, as well as information technology equipment used during the elections for 10% of the polling stations in each Electoral Administration Zone (EAZ).

Audited polling stations were randomly selected after the process was completed and the final election result was announced.

Through this process, the aim is to inspect the implementation of the law by the Commissioners in the second and third level of the election administration, crosscheck the regularity and accuracy of their activity in the counting of votes and the administration of the process, highlighting the issues that may have characterized the process not only at the quantitative level, but also at the qualitative level. The inspection also serves to attest the accuracy of information technology systems or equipment, which were used for electronic identification of voters.

On the other hand, the random selection of polling stations in which the crosschecking is performed, enables the generalization of the findings, thus allowing judgement relating to the extent to which potential irregularities identified during the process are present throughout the country.

Despite possible problem finding, it is important to note that the findings do not serve and have no effect on the final and already announced election results.

Findings from the post-election audit process are reflected in an administrative court decision or is referred to other competent bodies against the responsible commissioners who may have committed the violation. So, basically, the purpose of the post-election audit process is to verify the accuracy of the performance of duties by election commissioners in order to promote their accountability, as well as to eliminate the culture of impunity for any violators of the law, which are members of the election administration, regardless party affiliation or political connections they may have. The whole verification process is recorded on video and can be monitored by independent observers, media and representatives of any interested political subject.

In order to carry out the post-election audit of the Albanian Parliamentary Elections of April 25, 2021, the State Election Commissioner approved the relevant Guideline<sup>835</sup> and through random selection<sup>836</sup>

<sup>834</sup> Electoral Code of the Republic of Albania, Article 167/2.

<sup>835 &</sup>lt;u>Guideline no.15</u> date 07.10.2021 "On defining post-election examination procedures of ballot papers and election materials"

<sup>836</sup> Guideline no. 15 dated 07.10.2021, Chapter 2, Point 9.

in a public session chose 519 Polling stations<sup>837</sup>, which were subject to verification by the CEC administration.

The random selection of polling stations to be audited is a very important element, as at first it eliminates the possible discretion from CEC in the selection of polling stations, which would make the findings biased and unrealistic.

On the other hand, random selection guarantees that the findings can be generalized for the whole country, with a recognized margin of error<sup>838</sup>. In this sense, including the 32 polling stations of CEAZ no. 40 in Tirana, which all underwent the verification process, the total number of audited polling stations sums up to 551 polling stations.

The monitoring process was carried out through 8 counting teams from October 14 to November 2, 2021 and was fully monitored by KRIIK observers allocated in the premises where the verification took place.

In addition to monitoring the process inside the hall, KRIIK received from CEC all minutes filled out by the verification teams, uploaded the data to an electronic database and processed them independently.

The records and the information were crosschecked and administered by the CEC counting teams in two record sheets: the first summarizing data on the number of votes for each subject and candidate, and the second summarizing data on law enforcement and administrative procedures by commissioners and / or ballot counters during the process.

The recounting of the ballots to crosscheck the number of votes won by each electoral subject and candidate was then complemented by a comparison with the summary figures of the approved table of results of the respective polling station. This verification and comparison of quantitative data was immediately reflected on the CEC website.

Meanwhile, the data from the election material box inspection, the compliance of the documentation fill-out and attended procedures with the legal framework, were reflected on a second form/account-sheet.

Findings from the post-election audit process were summarized in the final report drafted by the CEC administration and approved<sup>839</sup> by the State Election Commissioner.

The report contains not only the findings from the process, but also recommendations on various issues manifested in it.

<sup>&</sup>lt;sup>837</sup> The list of polling stations that were subject to the lottery to be selected should not include the Polling stations which were previously opened by the CCS in the framework of the complaint requests, the polling stations of the CEAZ no. 7 Municipality of Puka which were seized by the Prosecution and neither the polling stations of CEAZ Nr. 40, where electronic voting and counting was applied, which underwent all the verification process in the framework of technology verification.

<sup>&</sup>lt;sup>838</sup> Specifically, the survey of 519 polling stations, out of 5199 that were set up for the Assembly Elections of April 25, 2021, guarantees that the findings can be generalized to the whole country, with a margin of error of 4% (95% confidence level). In other words, if a certain irregularity is observed in 7% of the polling stations, it means that we are 95% confident that that irregularity is found in 3% to 11% of the polling stations.

<sup>839 &</sup>lt;u>Decision no. 470 dated 03.12.2021</u>"On the approval of the reports on the key findings of the post-election observation process of ballot papers, election material and electronic voting and counting equipment used in the elections for the Albanian Parliament, on 25 April 2021".

In conclusion, referring to these findings, the Commissioner asked CCS to take sanctions on 31 secretaries in 31 polling stations for problems met related to the Book of Meeting Minutes, and referred to the Prosecutor Office 67 members of 18 Ballot Counting Teams (BCT), as the findings concluded that there were credible indications of the criminal offense of election material and election results manipulation.

CCS reviewed the request for sanctioning polling station secretaries and decided<sup>840</sup> administrative sanctions against them. In CCS were also submitted two complaint requests from members of two BCTs. Only in one case<sup>841</sup> CCS partially considered the request and decided to repeal the point of the report related to the counting data issued by polling station 3305/2.

### XVII.2. Problems associated with the post-election observation process

Despite the fact that the carrying out of such a process was undertaken for the first time by CEC, some problems were observed which in the long run made it inefficient.

Following the standard set during the election process of April 25, 2021, the Central Election Commission shared in advance the draft guideline related to this process, with political parties and election observation organizations for their suggestions.

The guideline approved by the CEC stipulates that polling stations that were once opened for the purpose of various requests or issues already reviewed by the CCS, would be excluded from the lottery; a decision which does not properly reflect the provision of the Electoral Code<sup>842</sup>.

In KRIIK's judgment, the letter of the Code considers the ballot papers separately from the election material box, therefore the CEC guideline should not have had a completely exclusive approach to both ballot boxes, despite the fact that only one had been previously opened. Moreover, the administration was fully aware that as a result of complaints in CCS, only the votes for the electoral subjects were recounted, so only the ballot box had been opened.

By totally excluding these polling stations, these polling stations gain privileged status and are excluded from the lottery for the audit of two other, very important elements, such as the examination of preferential votes for candidates and the examination of election materials.

On the other hand, it is worth noting that despite the approved guideline, again 11 polling stations, which were once opened for due to appeals to CCS, were wrongly and contrary to the guideline reopened during the post-election audit. It is worth mentioning that from the examination process of these polling stations, in two of them were found problems related to the result and compliance with the administrative procedure.

Considering its importance and the innovation it carries out, this guideline should have been subjected to an in-depth discussion between the structures of the CEC itself and its administration, in order to

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<sup>&</sup>lt;sup>840</sup> <u>Decision no. 01 dated 05.01.2022</u> "On the review of the State Election Commissioner request no. 02, dated 24.12.2021, addressed to the Commission of Complaints and Sanctions, for imposing an administrative sanction".

Becision no. 03 dated 10.01.2022 "For the partial admission for review of the appeal request no. 76, dated 31.12.2021".
 Electoral Code of the Republic of Albania, Article 167/2 point 5 "... It is not allowed to inspect the ballot papers or election material that has been previously inspected mainly, or at the request of other interested parties."

anticipate any possible occurrence, as well as to improve the accuracy of the methodology followed and the efficiency of the whole mechanism. It would be appropriate to define in advance and categorize any errors that could be found, as well as to foresee the best way to follow up with each category.

Also, the definition of an error margin that would be considered a "human error" should have been made in advance, and not after the entire post-election observation process had been completed. It had to consider even the principle of proportionality and not apply it in the same way to each polling station, regardless of the number of voters in it.

Regarding the verification of data related to the observance of voting procedures, the form itself used by the CEC for the verification of data is found problematic.

The problems with the form consisted mainly in the way some of the questions were formulated, while the compilation of the physical questionnaire that the vetters used during the audit process was also problematic.

Regarding the questions, the form used for the evaluation was built with two-alternative questions: yes / no. So, if the phenomenon under investigation was present, the "Yes" alternative was circled and if not, "No" alternative was used.

Meanwhile, a considerable number of the questionnaire questions are problematic, as within a single question several such are included. In these cases, the circulation of the alternative "yes" or "no", does not make it clear whether the phenomenon has or has not been verified, or the precondition has or hasn't been met, which makes the data collected through this form unreliable to totally irrelevant for upcoming analysis.

On the other hand, judging by the way the vetters filled in the questions, it looks like in a number of cases different groups of vetters used different standards in responding the unclear questions, which included more than one question within. This is an indicator of their ambiguity in completing the data, or highlights problems with the way they are trained, which again casts doubt on the accuracy and reliability of the data collected<sup>844</sup>.

The other issue with the form has to do with the specific instrument used by the vetters, which was poorly formatted, with extremely small letters, and where the boxes for the answer were not in line with the question. Even in some cases, while there is a question, there is no respective box where the "Yes" or "No" option can be ticked as an answer to that question.

<sup>&</sup>lt;sup>843</sup> A descriptive case of this situation would be the formulated question: In case the EID has not been repaired or replaced three hours after notifying the technical assistance center, the polling station has decided to continue voting without the EID? For this question, the result is 363 "no", 10 "yes" and in 106 cases the vetters left it unanswered. These data show that in 363 polling stations (about 70%) the polling station did not make a decision to continue voting without EID three hours after the CEAZ was notified, which would be a serious violation of procedures and a major problem, as it is a very high percentage. This question does not allow to judge how many of the 363 polling stations for which the answer is "No" have not had problems with EID and, as a result, the CEAZ was not notified and there was no need to decide on the continuation of voting without the use of the EID. While most likely, this is the case in most of the "No" answers, this cannot be said with certainty. Overall, this makes it impossible to judge whether there have been such cases and, if so, how many there were.

<sup>&</sup>lt;sup>844</sup> Continuing the above case, the fact that in about 20% of cases (106) the vetters left this question unanswered, can be interpreted as the fact that in the respective polling station there was no need to replace the EID. This indicates that different vetters have used different standards in evaluating the question and giving an answer.

This unclear formatting caused major problems when entering the data in the electronic database by KRIIK, difficulties which were also confirmed by the CEC operators, who uploaded the data in the electronic database of the CEC.

The selection of polling stations that would be subject to post-election verification was conducted in a public session on October 14, 2021. Despite the fact that, referring to the Electoral Code<sup>845</sup>, polling stations opened by CCS in order to review complaints should not have been part of this lottery, this rule was not applied for polling stations of Berat District by the administration. Specifically for this district, 11 polling stations were selected, which were reopened<sup>846</sup> for verification by vetting groups, despite being previously opened by CCS.

In addition to being contrary to the CEC guideline itself, this caused further problems, as in one of these polling stations problems were identified during the counting and CEC decided to refer to the Prosecutor's Office the respective counters, as there were indications about the criminal offense of election materials and election result manipulation. The respective counters appealed the decision to CCS, which accepted the request, deciding to annul the findings of the report regarding polling station no. 3305/2, CEAZ no. 65.

It was also noted that the seriousness and responsibility of the CEC administration involved with the recounting process was not at the appropriate levels. This was reflected in delays in the implementation of the process, but also in material errors along it.

In certain parts of the verification, the process was carried out by only one of the members in the counting teams, and the second member joined late, in the end signing a record-sheet with data that he had not actually ascertained personally, but through the group colleague.

Many of the record-sheets completed by the vetters appear to be incomplete, as they lack various data such as signatures, dates, numbers in different places, ticking for "yes" or "no" in the record-sheets for quality verification of the process, etc. These data are essentially important in fulfilling administrative obligations by the CEC administration appointed to carry out the verification.

Referring to the above, KRIIK considers that the audit process will have to be carried out with greater accuracy, seriousness and responsibility by the CEC in the upcoming election processes. Completing the data automatically by the vetters themselves through a dedicated software could be considered; a program which will then generate the official document to be signed by the vetters for procedural accuracy. This would save time and effort, as the data would be processed and analyzed directly and without errors.<sup>847</sup>.

Also, CEC will have to fundamentally review the questionnaire used for data collection and engage professionals "experts in drafting questionnaires" for its drafting, and not be contented with

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<sup>&</sup>lt;sup>845</sup> Electoral Code, Article 167/2 point 5 "It is not allowed to inspect the ballot papers or election material that has been previously inspected mainly or at the request of other interested parties."

station 3345; polling station 3493; polling station 35111; polling station 3300; polling station 33052; polling station 3313; polling station 3314; polling station 3322; polling station 3430; polling station 3451; polling station 35791. 

The practice followed in this process by initially filling in manually forms with the data collected by the vetters, and latter entering the data of these forms into the software by another operator, even without considering the other problems mentioned above, will produce data that minimally contain the factor of "human error", thus artificially damaging the accuracy of the verification process.

compiling a questionnaire that simply lists the procedural steps to be followed by the election administration.

Despite the importance of the post-election audit process carries within, especially considering the fact that it was being applied for the first time as well as the political situation where opposition parties have requested in-depth investigations by the competent bodies and have the manipulations of the electoral process part of their daily public discourse, it turned out to be out of their focus and interest to be followed and observed<sup>848</sup>.

This lack of interest is a disturbing indicator that highlights the lack of real interest of political parties on the quality of carrying out and management of the electoral process, and consequently on the possibility of its further improvement, and their limited focus on the election result and on processes that may affect or alter it.

# XVII.3. CEC report on the post-election auditing process

The report compiled on the findings from the post-election examination of ballot papers and election material, was approved with the Commissioner's decision<sup>849</sup>.

This report is considered by KRIIK as superficial and incomplete. While the problem assessment form was very comprehensive, the report included only a small number of issues that were vetted. The report is almost entirely descriptive in nature; analyzes related to possible causes of the observed problems are almost non-existent. The same is evidenced in the recommendations of the report, which focus entirely on technical measures that can be taken to eliminate errors in documentation filling out, thus presuming all issues simply as "human errors", thus not considering the possibility of errors committed with deliberate will to influence or manipulate the election result.

A considerable number of issues in the report are addressed in a single descriptive sentence ("x" problem was identified in "n %" of polling stations). This type of description is given also to problematic cases which, despite being seemingly minimal in number and technical in nature, provide opportunities to use methods or ways to influence or manipulate the will of citizens and the election result<sup>850</sup>.

The final approved report identified 32 Polling stations whose secretaries had not administered or had not fully administered the Meeting Records Book, and as a result they were referred to the CCS for administrative sanctioning.

<sup>&</sup>lt;sup>848</sup> Only the Socialist Movement for Integration Party had observers throughout the process.

<sup>849</sup> Decision no. 470 dated 03.12.2021 "On the approval of the reports on key findings of the post-election observation process of ballot papers, election material and electronic voting and counting equipment used in the elections for the Assembly of Albania, dated 25 April 2021."

<sup>850</sup> Such a case is e.g., the fact that the report simply states that in 86% of the polling stations the number of unused ballot papers found in the respective envelope matches the number indicated in the closing record paper of the polling station. This means that in 14% of polling stations there were more or less unused ballots. The report does not explain the percentage of the first case and the second case, but in the case of missing unused ballots, it is a signal that a ballot may have gone out of the polling station, which paves the way for manipulation of the election result in that polling station as a whole, or even in other PS in that constituency.

During the review of the case by the latter, the administration referred that there were only 31 and not 32 polling stations, arguing that one polling station was incorrectly included in the list of the final report on the findings of the post-election audit, which again is an indication of not giving appropriate attention to this process by the administration.

Regarding the findings of the Report, CCS conducted two public hearings, one convened after the request of the Commissioner and another after the complaint by the members of GNV no.4 and no. 8 in CEAZ no. 65, Berat Municipality. The other appeal requests were not considered by the CCS, as their object for reporting some counters to the Prosecutor's Office is not competence of the CCS, but it's an expression of Commissioner's will as a public servant.

In both of its trials, the CCS found problems associated with the process, as well as administrative irregularities in terms of the administration of evidence and facts.

Regarding the secretaries of polling stations, despite taking<sup>851</sup> administrative measures at the request of the Commissioner<sup>852</sup>, CCS expressed that the Commissioner had not carried out a proper administrative investigation procedure, especially in terms of comprehensive and harmonized assessment of evidence and facts aiming not only the verification of the regularity and accuracy of the election administration activity during the administration of the process, evaluation and counting of votes, but mainly of charging them with legal responsibilities related to their given function in the electoral process. In this context, the investigation procedure conducted by the SEC is not complete and does not comprehensively satisfy the requirements of the law regarding the investigation and definition of actual responsibility for each of the persons for whom an administrative measure has been requested.

Regarding the counters of polling station 3305/2, CCS partially repealed that part of the report related to the counting data from polling station 3305/2.

CCS reasoned that<sup>853</sup> this polling station should not have been included in post-election vetting and that the Commissioner had not followed proper procedures regarding post-election vetting and administrative investigation.

# XVII.4. Findings on the data obtained from the vetting process

# XVII.4.1. Findings from quantitative vetting

Through recounting of ballots for each electoral subject and candidate, the counting teams at the CEC obtained the respective result found in each ballot box for each subject and candidate. According to the instructions given, this group had no right to change the number of ballots deemed invalid from the first count, but only to examine them judging their invalidity reason. Yet, if an invalid vote was counted in favor of any subject or candidate, that vote would have to be deducted. Thus, as the whole the number of invalid votes could not be reduced.

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<sup>&</sup>lt;sup>851</sup> <u>Decision no. 01 dated 05.01.2022</u> "On the review of the request of the State Election Commissioner no. 02, dated 24.12.2021 addressed to the Complaints and Sanctions Commission, for imposing an administrative sanction."

<sup>&</sup>lt;sup>852</sup> The request of the Commissioner was accepted due to the inactivity demonstrated by 31 secretaries, by not participating in the held session despite notification, which according to CSC denotes admission of the violation committed by them.

<sup>853</sup> Decision no. 05 dated 12.01.2022 "For reviewing appeal request no. 76, dated 31.12.2021".

After recounting each polling station and completing the relevant record-form, a difference (if any) could be drawn between the result reflected in the Summary Table of Results and the result after verification. The differences found from this process were the change in the number of votes between the subjects or candidates, both in the negative and the positive direction. Upon completion of the process, it is noticed that though not at a high level or influencing the outcome result, there were accrued votes for another subject or candidate.

Specifically in 371 out of 519 recounted polling stations (71.5%), the counting team did not find any difference in the number of votes for electoral subjects. In 148 polling stations (28.5%) differences ranging from 1 to 29 votes were found.

This number is extremely worrying since, considering the possible application of those data to the whole country, it practically means that in 24.5 to 32.5% of the polling stations across the country there have been errors in the counting of votes by of counters.

Regardless of how many votes the result differs and whether or not this has an impact on the election result, taking into account that the post-election verification was not intended to change the result, but to identify irregularities and charge the respective election administrators with responsibility, the findings show a very low level of responsibility from counters.

Out of 17 electoral subjects included in the ballot, for seven<sup>855</sup> of them, no difference was found in the result for the electoral subject, even after examination. For the other 10 subjects the differences were diverse<sup>856</sup>, but the highest difference was found for the PD-AN Coalition with 118 extra votes.

The recounting data for the candidates' votes, i.e., for preferential voting, are even more disturbing. It is noticed that, in contrast to the result for electoral subjects, the number of polling stations in which there was no difference is only 26 polling stations out of 519 (5%). In all 493 other polling stations, differences were found: beginning with 1 to 76 votes.

The Central Election Commission decided to consider the differences from 1 to 20 votes as a human error, whereas the counters of 18 polling stations where the difference in the counting was from 21 to 76 votes were referred to the Prosecutor's Office as suspects for the criminal offense of falsification of election materials and election results.

This figure is arbitrary and in any case in the report it's not explained what is the reasoning used to define this limit, but a very ambiguous and general expression is used that "... the difference in result for the candidates from 1-20 votes is assessed as an acceptable margin of human error, referring also

<sup>&</sup>lt;sup>854</sup> When the difference is negative it indicates that the number of ballots found from the observation process is less than the number of ballots recorded in the summary table by the first counting group. When the difference is positive it indicates that the number of ballots found from the observation process is greater than the number of ballots recorded in the summary table by the first counting group.

<sup>&</sup>lt;sup>855</sup> National Front Party, Movement for Change Party and 5 independent candidates.

<sup>&</sup>lt;sup>856</sup> PSD with 6 votes more, PLDSH with 3 votes more, BD with 6 votes more, ABEOK Coalition with 4 votes less, SMI with 19 votes more, NTH with 3 votes less, LRE with 3 votes less, The PD-AN coalition with 118 votes more, the ADR with 1 vote less, and the SP with 71 votes more.

to the technical standards as long as these differences have not affected a significant change in the result for candidates ... ".

It is not clear which technical standards the first part of the reasoning refers to, while the second argument, that the differences did not affect the result, does not justify setting a limit of 20 votes, as the same paragraph of the report states that "...the margin of error by the ballot counting teams for the subjects did not affect the election result". It remains unclear, thus, what is the reason for segregating these counting groups from the others, as in no case does it seem that the differences have brought about changes in the result.

In total there were 682 out of 1,832 candidates<sup>857</sup> for whom differences in the result were found after recounting. The biggest difference was found for the MP of the PD-AN coalition Mr. Lefter Gështenja with 116 added votes in the summary table of results. While the candidate whose highest number of votes was removed is in the same electoral subject and in the same constituency, Mr. Ardian Zeneli, who, after the recount resulted in 100 missing votes.

Generally, the difference in candidate votes is filled within the same subject, i.e., if removed from one candidate of a political force, they are added to another candidate within the same subject.

Also, the highest number of candidates where differences were found is within subjects which have proposed the counters of the Ballot Counting Teams, i.e., SP, DP and SMI.

All of the above raise strong doubts that the errors are intentional, or even influenced by certain candidates. Furthermore, the fact that the candidates' votes have moved in favor of candidates from the same political force is a very disturbing sign, as it is an indication that the counters of the opposing political parties present in the counting process have been passive in safeguarding the integrity of the elections, as long as the result of the party that appointed them remained intact. So, the priority for these counters was to protect the interest of the party that had appointed them and not to fulfill their duties as election administrators in accordance with the law, thus behaving as party militants and not impartial administrators of the process.

From the findings of these data, the Commissioner referred to the Prosecutor Office 67 counters from 18 Ballot Counting Teams.

KRIIK thinks that the Central Election Commission should have taken stronger measures to identify the reason for these discrepancies, and not be satisfied with arguing that up to a certain number of mismatching votes (the arbitrary number of 20 votes difference) can be considered a "human error" and above this figure it will be referred to the Prosecutor's Office.

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<sup>&</sup>lt;sup>857</sup> With SP there was a difference in 135 out of 153 candidates; With PD-AN there was a difference in 107 out of 153 candidates.

With the SMI there was a difference in 141 out of 153 candidates; with MCh there was a difference in 46 out of 153 candidates; with ADR there was a difference in 15 out of 153 candidates; with LRE there was a difference in 30 out of 153 candidates; with NTH there was a difference in 33 out of 153 candidates; with ABEOK there was a difference in 13 out of 153 candidates; with DC there was a difference in 37 out of 153 candidates; with LDSH there was a difference in 25 out of 153 candidates; with PBK there was a difference in 24 out of 153 candidates; with SDP there was a difference in 76 out of 153 candidates.

### XVII.4.2. Qualitative vetting

The election administration process by polling station commissioners and counters, referring to the minutes completed by the CEC staff, who conducted their audit, is considered to be associated with a lot of predicaments.

It is not clear if these are issues due to human error, issues with the used form (see above), or as a result of lacking the necessary know-how regarding the administration of the process, which may result from lacking a full training of vetters.

The data reflected in these recordings, as mentioned above, are not complete. Besides the fact that there are questions which answers are not in the recordings, the questions themselves in many cases are unclear to be summarized with answers of "yes" and "no" but require further elaborated answers.

Regarding the voting process, the audit data shows that in 14% of polling stations it started after 7.00<sup>858</sup> AM, while in 16% this process is closed after 19.00<sup>859</sup> o'clock. In 3% of polling stations there has been a suspension of voting for various reasons, while 2 out of 519 audited polling stations have sought the assistance of the State Police.

Regarding the required documentation to be filled out by polling station commissioners, it turns out that there have been serious problems, which in the CEC report related to this process have been slip pasted with a single descriptive sentence or have not been mentioned at all.

Specifically, referring to the data from post-election auditing process, in 14% of the polling stations the decisions of the commission were not sealed with the seal of the polling station, and in 5% of them the records were unsealed.

Also, in 6% of polling stations, no records stating the number of ballots received were found in the box of election materials.

What is considered an even more serious violation is the fact that in 8% of polling stations it turns out that there were unsealed ballots, an imprudence which, de facto, invalidates the vote of the citizen who used that ballot.

8 ballot boxes were found damaged by the recounting group, while 3 were not properly sealed. Furthermore, 338 polling stations which have at least one missing tool/material from the necessary election materials, defined by law to be in the box<sup>860</sup>, were found.

- a) the envelope where the unused ballot papers are placed,
- b) envelope where "DAMAGED BALLOT PAPERS" are placed,
- c) envelope "CERTIFICATES OF ELECTRONIC IDENTIFICATION OF VOTERS",
- ç) the list of voters, including the special register of voters,
- d) originals of polling stations decisions and unused standard forms of polling stations decisions,
- e) the seal of the polling station,

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<sup>&</sup>lt;sup>858</sup> Meanwhile, the findings of KRIIK observers during election day show that only 66.67% of polling stations opened on time (see Section "Voting Day" in this Report). The difference in figures probably shows the tolerance of the commissioners in identifying it as a delayed opening for delays of several minutes, which KRIIK observers have considered a delayed opening.

<sup>&</sup>lt;sup>859</sup>According to KRIIK findings, 14.6% of polling stations were closed after 19:00. Considering the margin of error in both cases, this figure is considered to match.

<sup>&</sup>lt;sup>860</sup> The box of election materials lacks documents such as:

This data shows a serious situation regarding the ability/responsibility of third level commissioners to administer the electoral process. Practically, it means that in 65% of the polling stations, the election materials were not administered according to the procedures in force.

In 16% of polling stations the records which should be found inside the ballot box or with election materials were not found by the recounting team.

In 19.6% of polling stations (102 polling stations) no data were recorded regarding the number of voters according to legal requirements<sup>861</sup>.

The Meeting Records Book (MRB) is the protocol where everything that happens in the polling station should be written, which is the direct responsibility of the polling station secretary.

According to verification data, 31 polling stations did not complete the RMB at all. In the RMB of 18 polling stations there are records of voters who have attempted to vote more than once; in 73 polling stations there are records for voters who did not find their name on the list; in 37 polling stations the data reflected in the minutes are different from those found in the RMB, in 39 polling stations there were notes of resignation or replacement of commission members; in 419 polling stations there was no record of the departure and return of any commission member.

Considering that the purpose of the post-election audit is not only the recounting in function of the results, but especially the verification of the legal framework observation in the procedures followed by the election commissioners; any observed problem should serve as an indication for improvement, not only of the regulatory framework, but also in the review of training modules for commissioners, in particular their duration and frequency.

### XVII.4.3. Verification of EID equipment operation

The process of verifying the dactyloscopy data collected by the Electronic Identification Devices (EID) was also part of the verification by the CEC administration, for the polling stations selected to be vetted.

In the record paper to be completed by the verification team there were some questions which referred to the data collection related to the use of EID.

According to the guideline of the Regulatory Commission, the opening and closing report generated by the EI device is undersigned by the members of the polling stations and put into the box.

It resulted that the opening report of the electronic identification process was missing in 20% of polling stations, while the closing report was missing in 18% of polling stations.

f) the stamp of the polling station chairman,

g) stamps with unused security codes,

h) seals with damaged security codes,

i) record paper of the closure of the EID,

j) the book of minutes of polling station meetings

<sup>&</sup>lt;sup>861</sup> In the ending records, or in the book of meeting protocol there is no data on the number of voters, or on the number of female voters who voted.

Also, in at least 15% of the audited polling stations, it is noticed that at least one problem with EID was encountered during election day.

The implementation for the first time of the electronic identification of the voters was accompanied by various problems, which were noticed and made public even on the day of the elections, and which are to some extent acceptable, given the short time available for the commissioning of this technology.

To minimize and address the problems associated with this process, based also on the problems observed by the audit in the use of EID, CEC should involve itself in a longer period before the next elections to recruit and periodic train EID operators.

### XVII.4.4. Invalid votes

The number of invalid votes in the electoral process of April 25, 2021, was the highest ever observed in an electoral process in Albania (about 5%).

Assessing the nature of their invalidity was part of the review by the verification teams. The members of these groups could only observe the nature of the invalid ballots but could not judge whether the counters had correctly considered them as such. However, if this group found clear invalid votes calculated for any electoral subject, had to remove them from the relevant electoral subject and classify them as invalid. Overall, after verification, the number of invalid votes could only increase.

According to the verification data in the verification forms administered, it results that in four polling stations<sup>862</sup> were ascertained invalid ballot papers due to their difference in shape, color and content with the official ballot paper.

This ascertained violation is much more serious than simply categorizing it as an invalid ballot, as the presence of such a ballot is an indication that at least one voter had inserted a paper sheet that was not a ballot paper and, consequently, the ballot paper received by the commission may have been taken out of the polling station.

In such a case, there exists a possibility of undertaking a mechanism or method to manipulate and distort the result and the will of the voters (such as the possibility to vote with pre-marked ballots outside the polling station).

No further steps were taken by the CEC regarding these cases, but they were simply mentioned in the post-election vetting report and this category of invalid ballots, which is of a different nature that stimulates other dynamics, was calculated as of the same nature as the other categories of invalid votes<sup>863</sup>.

According to the CEC report, it is evidenced that:

- 41% of invalid ballots are such because more than one of the electoral subjects was voted.
- 25% of the invalid ballots are because one electoral subject and the candidate of another electoral subject were voted.

<sup>&</sup>lt;sup>862</sup> polling station-07382, Lezhë County; polling station-0182, Shkodra Region; polling station-17951 and polling station-1532, Tirana Region.

<sup>863</sup> See <u>CEC report</u>, page 9.

- 15% of invalid votes are because they have annotations that make it impossible to determine if the vote is in favor of any electoral subject.
- 19% of invalid ballots are for other reasons according to the provisions of article 117, point 3 of the Electoral Code

### XVII.5. Verification of polling stations in EAZ no. 40

All Polling stations of the Electoral Administration Zone (EAZ) no. 40, Municipality of Tirana, where electronic voting and counting was applied for the first time, was subjected to the auditing process by the counting teams at the CEC.

After this process, no difference was found, both for the subjects and for the candidates. Only quantitative verification was performed for these polling stations.

Given the success of the use of electronic voting and counting, the CEC should make efforts to extend it to additional constituencies, yet associating it with a comprehensive, detailed and clear regulatory framework and providing complete transparency, cyber security and secrecy of citizens' vote.

### XVIII. RECOMMENDATIONS

### **Primary recommendations**

The process of in-depth and structural reform of the legal framework affecting elections, including, but not limited to, the Electoral Code, should be one of the main priorities of the future Assembly Legislature. The reform process should be based on the principles of complete transparency and real inclusion of stakeholders or those with expertise, domestic or international, and not limited to main political actors and foreign expertise. Legal changes will need to be consulted with civic and interest groups before being approved by the Assembly.

It is imperative that mechanisms be in place to guarantee a Central Election Commission both *de jure* and *de facto* independent of political parties and their narrow and short-term interests.

If the forthcoming legal changes preserve the preferential voting, the allocation of mandates will have to really reflect the preferences of the voters, without fictitious legal barriers that undermine representation.

The legal framework and mechanisms that guarantee the transparency of electoral finances need to be fundamentally revised and changed to guarantee maximum transparency and efficient control. Transparency of the financing of political parties before election day must be guaranteed.

The legal framework should provide for restrictions on the participation of senior officials in the campaign, so that the state and the ruling party are separate. Much more efficient and realistically functional mechanisms are needed to guarantee the non-involvement of public employees in the campaign, and to eliminate the possibility of intimidation and their compulsion to participate.

### Other recommendations

The right of party leaders to run in more than one constituency should be eliminated, to preserve the principle of equality between candidates.

A formula that is fairer in the division of seats between constituencies and guarantees equality of the vote can be taken into consideration. A model based on the number of citizens or voters but corrected based on the number of voters who have actually voted in a number of previous elections would be fairer, especially considering that certain areas of the country have different moving demographics, whether inward or outward.

The Electoral Code should address the legal threshold for candidates proposed by citizens, in order for them to have a real opportunity to compete.

It is recommended to set up a professional body of election commissioners within commissions of election administration zones with professional individuals, without connection to political forces. This is necessary to be accompanied by mechanisms to ensure that these individuals are not punished

or rewarded for their actions or omissions in the implementation of the law during the electoral process.

It is recommended that legislation provide for permanent locations of premises where election administration bodies perform their activities, locations that can be continuously updated by the administration of the Central Election Commission, as far as possible. This approach would increase the operability of the CEC administration in providing the commission with the necessary infrastructure and services in a timely manner.

The CEC should adopt mechanisms that guarantee increased transparency, such as providing open data, publishing video recordings from counting tables, and immediate publication of decisions of the second and third level zonal commissions, etc. Real-time video streaming of the counting process (including CEAZ facilities and counting tables), or even the voting process, should also be) considered.

The publication of the decisions of the election administration at all levels should be done on the website of the CEC and / or the Local Government Units in the territory of which these CEAZs are located, such as. on the websites of the Municipalities, the District or even the Prefecture.

In order to increase transparency, denunciations submitted to the CEC by various actors should be reviewed in public hearings with the presence of the parties in the process.

Legislation should consider restricting the right of political parties to replace polling station commissioners and members of counting teams in an unmotivated manner on the eve of election day, as this hinders formal training, and consequently directly affects in the efficiency of these commissions.

Voter notification mechanisms for the presence on the list, including the publication of lists and the written notification of voters should ensure that all Albanian voters have the opportunity to be informed. The mechanism cannot be based solely on electronic notification, which, although efficient and easy to use, may not be suitable for all categories of voters. It is necessary to fully regulate the written notification mechanism, in all its elements, in order to prevent individual or even institutional will to sabotage this process.

In order for the operation of political parties to be in accordance with the democratic norms sanctioned by the Constitution, the law on political parties must clearly state, at a minimum, that the mandate of the party chairman and its governing bodies must have a certain duration (a limit duration may be provided by law) and that the party must conduct elections within the time limit set by law.

In addition to the above, the legal framework should define the verification mechanisms and sanctions against the political party that does not meet this legal norm. It can be considered that one of the duties of the CEC is to verify the minimum criteria of internal democracy of the party, as a condition for registration as an electoral subject.

The candidate verification process must be completed before election day. Even if it turns out to be impossible due to the necessary time in cases of verifications abroad, at least the results of

verifications within the territory of Albania should be made public, in function of which only a better interaction between institutions would suffice.

The Central Election Commission should take a much more proactive role in overseeing the finances of electoral subjects. Monitoring conducted by the CEC should include the cost of election activities. In general, measures should be taken to ensure that monitoring is efficient, and that data provided by monitors are made available to the public in a timely and simple format.

Particular attention should be paid to monitoring the activities of political parties before the start of the election campaign, in order to accurately and truly estimate the expenditures made for electoral purposes, given that political parties in Albania, for years now start the campaign some months before its legal commencement.

The Electoral Code should include a section dedicated to media behavior during the election period (not just the election campaign) by separating the campaign section from that of media behavior. The Code should include the obligation of all media operating in the Republic of Albania to meet the principles of impartiality and objective information of citizens, and not be limited to the obligations of audiovisual media.

To fulfill its mission of receiving and transmitting information independently, the media must have the guarantee to be free to cover any electoral activity based on its capacity.

AMA should take measures so that in the future media coverage is monitored in both quantitative and qualitative elements, such as the context or tone used by the media in covering the election campaign. As electoral subjects, de facto, start their campaign months before the 30-day deadline, media monitoring should be timelier.

Legislation should clearly define deadlines for compensating for missing media space for an electoral subject. These deadlines should have an immediate effect throughout the monitoring period, so that they can ensure an impartial coverage of election activities.

Electoral subjects or independent candidates should be given equal space for political advertising on public television. By the same principle, the Electoral Code should give all electoral subjects, as well as independent candidates, equal opportunities to promote their platforms in the private media, increasing the transparency of political advertising tariffs in these media.

The mechanism of monitoring and sanctioning media behavior should be reviewed in order to ensure that citizens will receive impartial and objective information throughout the election campaign. The CEC should review AMA reports with a much more frequent frequency and set clear deadlines for compensating for missing time.

The CEC, in cooperation with the Municipalities, should develop bylaws which guarantee the accessibility of persons with disabilities in the electoral process. It is suggested to build a permanent database which can be updated and continuously considered in the preparation of the next electoral infrastructure.

### XIX. ABOUT KRIIK

### XIX.1. About the organization

The Coalition for Reforms, Integration and Consolidated Institutions (KRIIK Albania) is a nonprofit and nongovernmental organization, established in October 1997 by a group of students. The organization is headquartered in Tirana and it operates across the country through its local representatives and/or partner organizations. KRIIK was registered in December 1997 as an organization with membership. The highest decision-making body of the organization is the General Assembly of the Members, which elects steering bodies and supervises their work, and approves important statutory, strategic, and political documents.

The fundamental values at the core of the work of KRIIK include voluntary civic engagement; impartiality and independence; integrity; consistency in fulfilling its mission in a professional and dedicated manner; objectiveness in assessing facts and arguments; respect for human and opinions diversity; and transparency in activities and environmental protection.

KRIIK envisages a society where rule of law is respected; fundamental human rights and values, civil rights, political rights, and conscience rights of individuals are respected without compromise; where the sense of community and meaningful involvement of citizens in policymaking is a core value; and elected representatives and other public officials are primarily interested in the well-being of the citizens.

KRIIK works for the protection and guarantee of human rights and freedoms, as well as the full dimension of human security, through strengthening the rule of law, democratic governance, promotion of civic activism and engagement, and promotion of full transparency and accountability of public and political institutions.

### XIX.2. Engagement for electoral integrity

KRIIK has engaged in election observation since its establishment, by working with voluntary activists in elections observation actions of other organizations. Since 2000, KRIIK has partaken in joint observation actions with several local organizations.

Since 2005, KRIIK has been a founding member and then one of the leading organizations of the Coalition of Domestic Observers (CDO), the largest group of local organizations observing elections in Albania. In the framework of or in cooperation with the CDO, KRIIK has observed all general, parliamentary, or local elections in Albania during 2005 - 2017, as well as most partial election processes during this period. In 2019, KRIIK observed the Elections for the Local Government Bodies, in cooperation with nine local organizations experienced in election observation, which used their resources to the benefit of observation action, as well as their activists as long-term observers.

In cooperation with the Elections to Conduct Agency (ECA), KRIIK carried out a parallel vote counting at the national level for the first time during the Elections for the Assembly of Albania of 2009.

As part of the European Network of Election Monitoring Organizations, a network of leading election observation organizations in Southeastern and Central Europe, Eastern Europe, and Central Asia, since 2009 KRIIK has contributed to strengthening electoral integrity in several countries of the region, by deploying its activists as observers in international observation missions, at all levels (core team, including head of mission; long-term; and short-term observers). KRIIK has been part of the Secretariat of ENEMO Secretariat since 2015.

In addition to election observation, KRIIK has also undertaken a series of initiatives aiming at strengthening electoral integrity in Albanian and continuously (not only during electoral periods) monitors every political or institutional development that may affect electoral integrity.

### XX. ACRONYMS

NDAP	New Democracy Alliance Party	DNFP	Democratic National Front Party
UETCA	Union, Emigration, Time and Conservatives Alliance	LDUP	Liberal Democratic Union Party
AMA	Audiovisual Media Authority	PUAPP	People's Union of Albanian Pensioners Party
OP	Ombudsperson	DP	Democratic Party
GDCS	General Directorate of Civil Status	DP - AC	Democratic Party - Alliance for Change Coalition
NDSP	New Democratic Spirit Party	PJIU	Party for Justice Integration and Unity
VCT	Vote Counting Team	CDPA	Christian Democratic Party of Albania
IECD	Institution for the Execution of Criminal Decisions	AEP	Albanian Emigration Party
CSC	Complaints and Sanctions Commission	CDP	Christian Democratic Party
SSAI	Supreme State Audit	NCPA	National Conservative Party Albania
Commission er	State Electoral Commissioner	ADMP	Albanian Democratic Movement Party
PSC	Polling Station Commission	LMP	Legality Movement Party
CEC	Central Election Commission	MCP	Movement for Change Party
EC	Electoral College	NMP	New Movement Party
CEAZ	Commission of Election Administration Zones	TAP	Time for Albania Party
SMI	Socialist Movement for Integration	ARP	Albanian Republican Party
MND	Movement for National Development	SP	Socialist Party of Albania
MoI	Ministry of Interior	SDP	Social Democratic Party
LGU	Local Government Unit	PS	Polling Station
HIP	Hashtag Initiative Party	PS	Polling Station
ODHIR	Office for Democratic Institutions and Human Rights	NRCS	National Register of Civil Status
AEP	Agrarian Environmentalist Party	Regulat or	Regulatory Commission
DAP	Democratic Affiliation Party	DCM	Decision of Council of Ministers
UHRP	Union for Human Rights Party	BCC	Ballot Counting Center
ADUP	Albanian Democratic Union Party	EAZ	Election Administration Zone
NFP	National Front Party	CSO	Civil Status Office
		REO	Regional Electoral Office

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ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021



# **XXI - ANNEXES**

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# STATISTICAL DATA FROM STATIONARY OBSERVERS AT POLLING STATIONS

The tables below present data from stationary observers at Voting Centers on election day. Each table shows the percentages reported by observers, the margin of error for that specific question, the lower limit (minimum percentage for the respective phenomenon on the ground) and the upper limit (maximum percentage for phenomenon on the ground). Based on the sample and sampling method, one can say with 95% confidence that the proportion of the relevant phenomena in the ground is between the lower and the upper limit.

Part of the tables express the figures in numbers and not in percentages, while another part expresses them in percentages, but where the margin of error is not presented. In these cases, it is a question of conditional questions (e.g., if a certain phenomenon has occurred, in how many cases it was observed). Since in these cases the question refers to a sub-sample of the main sample, the calculation of the error margin is no longer reliable, as the calculation of the error margin can only be performed on the sample, which has been selected according to the probability rules. As a result, they are presented by numbers of cases observed or percentages.

For a more complete transparency on all monitored elements and that the data collected can serve as a record of the entire course of election day, the following are the answers for most of the questions of the questionnaires used by stationary monitors during election day. Also, these data, as well as other detailed data presented in this report are given for the purpose of use as the basis of information given to the electoral law along the improvements of the next electoral reform process.

### OPENING OF VOTING CENTERS

VOTING CENTER OPENING SCHEDULE	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) VC OPENED ON TIME (07:00)	66.67%	4.91%	61.76%	71.58%
B) VC WAS OPENED BETWEEN 07:00 AND 07:30	24.58%	4.49%	20.09%	29.06%
C) VC WAS OPENED BETWEEN 07:30 AND 08:00	5.65%	2.41%	3.24%	8.05%
D) VC WAS OPENED BETWEEN 08:00 AND 08:30	1.98%	1.45%	0.53%	3.43%
E) VC WAS OPENED BETWEEN 08:30 AND 09:00	0.85%	0.95%	-0.11%	1.80%
F) VC WAS NOT OPENED UNTIL 09:00	0.28%	0.55%	-0.27%	0.84%

VOTERS WAITING IN LINE TO VOTE AT THE TIME OF OPENING, IF CENTER OPENED LATE	PERCENTAGE
A) YES	50.89%
B) NO	49.11%

NUMBER OF COMMISSION MEMBERS PRESENT AT THE MOMENT OF OPENING THE VC?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
7 MEMBERS	80.23%	4.15%	76.08%	84.38%
6 MEMBERS	10.45%	3.19%	7.26%	13.64%
5 MEMBERS	5.65%	2.41%	3.24%	8.05%
4 MEMBERS	3.67%	1.96%	1.71%	5.63%
3 MEMBERS	0.00%	0.00%	0.00%	0.00%
2 MEMBERS	0.00%	0.00%	0.00%	0.00%
1 MEMBER	0.00%	0.00%	0.00%	0.00%

### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

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**OBSERVATION** 

**FINAL** 

**REPORT** 

WHO WAS MISSING, IF NOT ALL MEMBERS WERE PRESENT?	NUMBER
A) CHAIRMAN	0
B) SECRETARY	0
C) MEMBERS.	70

PLACEMENT OF TABLES, CHAIRS AND SECRET ROOM IN ORDER TO ENSURE THE SECRECY OF THE VOTE	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	99.15%	0.95%	98.20%	100.11%
B) NO	0.85%	0.95%	-0.11%	1.80%

PLACEMENT OF TABLES, CHAIRS AND SECRET ROOM IN ORDER TO ENSURE FREE MOVEMENT OF VOTERS?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	98.87%	1.10%	97.77%	99.97%
B) NO	1.13%	1.10%	0.03%	2.23%

DID THE VC COMMISSION REMOVE THE PROPAGANDA MATERIALS THAT COULD BE FOUND WITHIN A RADIUS OF 150 METERS FROM THE CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	68.64%	4.83%	63.81%	73.48%
B) NO	7.34%	2.72%	4.63%	10.06%
C) N/A	24.01%	4.45%	19.56%	28.46%

WAS THE VOTING CENTER OPENING MINUTES COMPLETED?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	100.00%	0.00%	100.00%	100.00%
B) NO	0.00%	0.00%	0.00%	0.00%

WAS THE BALLOT BOX CHECKED IN THE PRESENCE OF ALL COMMISSION MEMBERS AND OBSERVERS?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	100.00%	0.00%	100.00%	100.00%
B) NO	0.00%	0.00%	0.00%	0.00%

WERE THE SECURITY SEALS REMOVED FROM THE ELECTRONIC IDENTIFICATION DEVICE (PEI) IN THE PRESENCE OF ALL VCC MEMBERS AND OBSERVERS?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	95.48%	2.16%	93.32%	97.64%
B) NO	4.52%	2.16%	2.36%	6.68%



## **FINAL OBSERVATION REPORT**



WAS THE PEI ACTIVATED IN THE PRESENCE OF ALL VCC MEMBERS AND OBSERVERS?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	95.20%	2.23%	92.97%	97.43%
B) NO	4.80%	2.23%	2.57%	7.03%

WAS THE REPORT ON THE OPENING OF THE VOTING CENTER PRINTED BY THE PEI?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	95.20%	2.23%	92.97%	97.43%
B) NO	4.80%	2.23%	2.57%	7.03%

WERE THE BOXES CLOSED AND SEALED WITH THE SECURITY CODES BEFORE THE VOTING STARTED?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	99.72%	0.55%	99.16%	100.27%
B) NO	0.28%	0.55%	-0.27%	0.84%

WERE THE BALLOT BOX' SEALING MINUTES INSERTED WITH THE SECURITY CODES THAT SEALED THE BOX INSIDE THE BOX BEFORE THE START OF VOTING?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	99.72%	0.55%	99.16%	100.27%
B) NO	0.28%	0.55%	-0.27%	0.84%

WERE THE MINUTES OF THE OPENING OF THE VOTING CENTER PRINTED BY THE PEI INSERTED INSIDE THE BOX BEFORE THE START OF VOTING?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	91.53%	2.90%	88.62%	94.43%
B) NO	8.47%	2.90%	5.57%	11.38%

WAS THE CENTER EQUIPPED WITH ALL THE NECESSARY MATERIALS FOR THE VOTING PROCESS?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	98.87%	1.10%	97.77%	99.97%
B) NO	1.13%	1.10%	0.03%	2.23%

IF THE POLLING STATION WAS NOT EQUIPPED WITH ALL THE NECESSARY MATERIALS, WHAT WAS MISSING?	NUMBER
B) STAMP INK	1
D) RECORDS	2
G) ENVELOPES FOR DOCUMENTATION	1

OVERALL ASSESSMENT OF THE PROCEDURES FOR OPENING THE VOTING CENTER	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) VERY GOOD	66.10%	4.93%	61.17%	71.03%
B) GOOD	28.25%	4.69%	23.56%	32.94%
C) PROBLEMATIC	5.65%	2.41%	3.24%	8.05%
D) VERY PROBLEMATIC	0.00%	0.00%	0.00%	0.00%

SEPTEMBER 2020 – JANUARY 2022

### **VOTING PROCESS**

NUMBER OF COMMISSIONERS WOMEN	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
NO WOMAN COMMISSIONER	22.22%	4.29%	17.93%	26.52%
1 WOMAN COMMISSIONER	25.56%	4.51%	21.05%	30.06%
2 WOMEN COMMISSIONERS	22.22%	4.29%	17.93%	26.52%
3 WOMEN COMMISSIONERS	17.50%	3.93%	13.57%	21.43%
4 WOMEN COMMISSIONERS	7.50%	2.72%	4.78%	10.22%
5 WOMEN COMMISSIONERS	4.17%	2.06%	2.10%	6.23%
6 WOMEN COMMISSIONERS	0.28%	0.54%	-0.27%	0.82%
7 WOMEN COMMISSIONERS	0.56%	0.77%	-0.21%	1.32%

DID YOU NOTICE UNAUTHORIZED PERSONS AT THE VOTING CENTER	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	5.00%	2.25%	2.75%	7.25%
B) NO	95.00%	2.25%	92.75%	97.25%

IF YOU NOTICED UNAUTHORIZED PERSONS AT THE POLLING STATION, WHO WERE THEY?	NUMBER
B) PARTY MEMBERS	14
C) OTHERS (EXPLAIN)	4

WHEN THE CHAIRMAN LEFT THE VC DID HE PASS THE STAMP OF THE CHAIRMAN OF THE VC FOR USE TO ANOTHER MEMBER WITH THE SAME POLITICAL AFFILIATION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	56.11%	5.13%	50.98%	61.24%
B) NO	16.11%	3.80%	12.31%	19.91%
C) N/A	27.78%	4.63%	23.15%	32.40%

WAS THE SECRET ROOM PLACED IN SUCH A POSITION THAT IT COULD BE SEEN BY ALL?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	94.17%	2.42%	91.75%	96.59%
B) NO	5.83%	2.42%	3.41%	8.25%

WAS THE SECRET CHAMBER SET UP IN SUCH A WAY THAT THE SECRECY OF THE VOTE COULD BE ENSURED?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	98.33%	1.32%	97.01%	99.66%
B) NO	1.67%	1.32%	0.34%	2.99%



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WAS THE BALLOT BOX PLACED IN SUCH A POSITION THAT IT COULD BE SEEN BY ALL?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	96.67%	1.85%	94.81%	98.52%
B) NO	3.33%	1.85%	1.48%	5.19%

WERE THERE DISPLAY POSTERS EXPLAINING THE VOTING PROCEDURES?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	95.28%	2.19%	93.09%	97.47%
B) NO	4.72%	2.19%	2.53%	6.91%

WERE THERE DISPLAY POSTERS WITH CANDIDATES' NUMBERS?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	95.28%	2.19%	93.09%	97.47%
B) NO	4.72%	2.19%	2.53%	6.91%

WAS THE VOTERS LIST DISPLAYED?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	95.28%	2.19%	93.09%	97.47%
B) NO	4.72%	2.19%	2.53%	6.91%

WAS THE CENTER ADAPTED TO ENABLE THE VOTING WITHOUT ASSISTANCE OF VOTERS WITH PHYSICAL DISABILITIES?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	48.33%	5.16%	43.17%	53.50%
B) PARTIALLY	37.78%	5.01%	32.77%	42.79%
C) NO	13.89%	3.57%	10.32%	17.46%

WERE THERE CASES WHEN THE BALLOT PAPER WAS NOT STAMPED WITH THE STAMP OF THE VCC CHAIRMAN AND THE STAMP OF THE VC?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.00%	0.00%	0.00%	0.00%
B) NO	100.00%	0.00%	100.00%	100.00%

A PATI RASTE KUR ZGJEDHËSIT U PAJISËN ME FLETËN E VOTIMIT PËRPARA SE TË KONTROLLOHESHIN NË TË DY DUART NËSE ISHIN TIMBROSUR MË PARË?	PËRGINDJA	MARZHI I GABIMIT	PRAGU I POSHTËM	PRAGU I SIPËRM
A) YES	1.11%	1.08%	0.03%	2.19%
B) NO	98.89%	1.08%	97.81%	99.97%

WERE THERE INSTANCES WHEN VOTERS WERE PROVIDED WITH THE BALLOT PAPER BEFORE BEING CHECKED ON BOTH HANDS IF THEY WERE PREVIOUSLY STAMPED?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.28%	0.54%	-0.27%	0.82%
B) NO	99.72%	0.54%	99.18%	100.27%

# OBSERVATION REPORT

WERE THERE CASES OF VOTERS BEING ALLOWED TO VOTE WITHOUT PRESENTING AN IDENTIFICATION DOCUMENT?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	5.56%	2.37%	3.19%	7.92%
B) NO	94.44%	2.37%	92.08%	96.81%

WERE THERE CASES OF VOTERS BEING ALLOWED TO VOTE WITHOUT BEING STAMPED WITH SPECIAL INK?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	2.22%	1.52%	0.70%	3.74%
B) NO	97.78%	1.52%	96.26%	99.30%

DID SHOW UP TO VOTE BY COURT DECISION, VOTERS WHO DID NOT HAVE THEIR NAME ON THE VOTER LIST?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	3.06%	1.78%	1.28%	4.83%
B) NO	96.94%	1.78%	95.17%	98.72%

24.2. IF THERE WERE VOTERS WHO APPEARED BY COURT ORDER, WAS THEIR NAME RECORDED ALONG WITH THE IDENTIFICATION DOCUMENT NUMBER IN A SPECIAL REGISTER?	NUMBER
A) YES	11
B) NO	0

WERE THERE CASES OF VOTERS VOTING OUTSIDE THE SECRET CHAMBER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.56%	0.77%	-0.21%	1.32%
B) NO	99.44%	0.77%	98.68%	100.21%

DID YOU NOTICE ANY VOTERS USING THEIR CELL PHONES INSIDE THE POLLING STATION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	5.00%	2.25%	2.75%	7.25%
B) NO	96.39%	1.93%	94.46%	98.32%

DID YOU NOTICE ANY VOTERS WITH CELL PHONES IN HAND IN THE SECRET CHAMBER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	3.89%	2.00%	1.89%	5.89%
B) NO	96.11%	2.00%	94.11%	98.11%



## **FINAL OBSERVATION REPORT**



DID YOU NOTICE CASES WHEN THE PERSON ACCOMPANYING VOTERS WITH PHYSICAL DISABILITIES DID NOT COMPLETE THE RELEVANT STATEMENT?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	4.72%	2.19%	2.53%	6.91%
B) NO	95.28%	2.19%	93.09%	97.47%

HAVE YOU NOTICED CASES WHERE A PERSON HELPED MORE THAN ONE VOTER WITH A DISABILITY TO VOTE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	2.22%	1.52%	0.70%	3.74%
B) NO	97.78%	1.52%	96.26%	99.30%

DID YOU NOTICE ANY MEMBER OF THE VOTING CENTER COMMISSION HELPING VOTERS WITH DISABILITIES TO VOTE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.83%	0.94%	-0.11%	1.77%
B) NO	99.17%	0.94%	98.23%	100.11%

WERE THERE VOTERS WHO SHOWED UP AT THE POLLING STATION AND COULD NOT VOTE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	19.72%	4.11%	15.61%	23.83%
B) NO	80.28%	4.11%	76.17%	84.39%

IF THERE WERE VOTERS WHO COULD NOT VOTE, FOR WHICH OF THE FOLLOWING REASONS AND GIVE THE NUMBER FOR EACH OF THE CASES IN THE FOLLOWING QUESTIONS:	NUMBER
A) THERE WAS NO IDENTIFICATION DOCUMENT	19
C) HIS/HER NAME WAS NOT IN THE LIST	50
D) OTHER (EXPLAIN)	2

WAS VOTING INTERRUPTED AT ANY POINT DURING THE OBSERVATION PERIOD?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	7.50%	2.72%	4.78%	10.22%
B) NO	92.50%	2.72%	89.78%	95.22%

DID YOU NOTICE CASES WHEN MORE THAN ONE PERSON ENTERED THE SECRET ROOM ("GROUP" OR "FAMILY" VOTING)?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	11.67%	3.32%	8.35%	14.98%
B) NO	88.33%	3.32%	85.02%	91.65%

OBSERVATION REPORT

WAS THERE ANY CASE OF VOTERS WHO HAD PREVIOUSLY VOTED THAT SHOWED UP TO VOTE AGAIN (E.G. STAMPED)	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.57%	0.65%	-0.07%	1.22%
B) NO	68.13%	3.99%	64.14%	72.12%

IF PREVIOUSLY STAMPED VOTERS SHOWED UP, WERE THEY ALLOWED TO VOTE?	NUMBER
A) YES	0
B) NO	3

IF STAMPED VOTERS APPEARED, WAS THIS FACT MADE KNOWN TO THE OTHER MEMBERS OF THE COMMISSION AND WAS THEIR NAME AND SURNAME RECORDED IN THE VOTING CENTER PROTOCOL BOOK?	NUMBER
A) YES	1
B) NO	2

HAVE YOU NOTICED CASES WHERE A PERSON VOTED MORE THAN ONCE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.00%	0.00%	0.00%	0.00%
B) NO	100.00%	0.00%	100.00%	100.00%

DID YOU NOTICE CASES WHERE ANY PERSON VOTED FOR OTHER PERSONS WHO WERE PRESENT THERE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	3.89%	2.00%	1.89%	5.89%
B) NO	96.11%	2.00%	94.11%	98.11%

DID YOU NOTICE ANY VOTERS WHO PHOTOGRAPHED THE VOTE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	1.94%	1.43%	0.52%	3.37%
B) NO	98.06%	1.43%	96.63%	99.48%

DO YOU NOTICE ANY ARMED PERSONS INSIDE THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.00%	0.00%	0.00%	0.00%
B) NO	100.00%	0.00%	100.00%	100.00%

DID YOU NOTICE ANY ARMED PERSON IN THE VICINITY OF THE POLLING CENTER, OTHER THAN LAW ENFORCEMENT?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.00%	0.00%	0.00%	0.00%
B) NO	100.00%	0.00%	100.00%	100.00%



## **FINAL OBSERVATION REPORT**



WERE THERE MOMENTS WHEN CHAOS WAS CREATED IN THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	6.67%	2.58%	4.09%	9.24%
B) NO	93.33%	2.58%	90.76%	95.91%

IF THERE WERE MOMENTS OF CONFUSION DURING THE VOTING, IN YOUR JUDGMENT IT WAS CAUSED BY:	NUMBER
A) LARGE NUMBER OF VOTERS	19
B) INABILITY OF COMMISSIONERS TO MANAGE THE SITUATION	5

DID YOU NOTICE AT ANY POINT DURING THE VOTING PROPAGANDA MATERIAL INSIDE THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.83%	0.94%	-0.11%	1.77%
B) NO	99.17%	0.94%	98.23%	100.11%

DID YOU NOTICE ANY PERSON INTERFERING IN THE WORK OF THE VOTING CENTER COMMISSION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	1.11%	1.08%	0.03%	2.19%
B) NO	98.89%	1.08%	97.81%	99.97%

IF YOU NOTICED PERSONS INTERFERING IN THE WORK OF THE COMMISSION, WHO WERE THEY?	NUMBER
B) PARTY MEMBERS	4

DID YOU NOTICE ANY UNAUTHORIZED PERSON RUNNING THE WORK OF THE VOTING CENTER COMMISSION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.56%	0.77%	-0.21%	1.32%
B) NO	99.44%	0.77%	98.68%	100.21%

IF YOU NOTICED ANY UNAUTHORIZED PERSONS RUNNING THE WORK OF THE COMMISSION, WHO WERE THEY?	NUMBER
B) PARTY MEMBERS	2

DID YOU NOTICE ANY PERSON PRESSURING THE MEMBERS OF THE VOTING CENTER COMMISSION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.28%	0.54%	-0.27%	0.82%
B) NO	99.72%	0.54%	99.18%	100.27%

# OBSERVATION REPORT

DID YOU NOTICE PEOPLE CAMPAIGNING OR TRYING TO INFLUENCE THE WILL OF THE VOTERS INSIDE THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.83%	0.94%	-0.11%	1.77%
B) NO	99.17%	0.94%	98.23%	100.11%

DID YOU NOTICE PEOPLE CAMPAIGNING OR TRYING TO INFLUENCE THE WILL OF THE VOTERS NEAR THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	1.94%	1.43%	0.52%	3.37%
B) NO	98.06%	1.43%	96.63%	99.48%

DID YOU NOTICE ANY PERSON PRESSURING VOTERS INSIDE THE POLLING STATION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.28%	0.54%	-0.27%	0.82%
B) NO	99.72%	0.54%	99.18%	100.27%

DID YOU NOTICE ANY PERSON PRESSURING VOTERS NEAR THE VOTING STATION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.28%	0.54%	-0.27%	0.82%
B) NO	99.72%	0.54%	99.18%	100.27%

WERE THERE ANY PROPAGANDA MATERIALS IN THE AREA ABOUT 150 M FROM THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	3.33%	1.85%	1.48%	5.19%
B) NO	96.67%	1.85%	94.81%	98.52%

DID YOU NOTICE GATHERINGS OF LAW ENFORCEMENT FORCES NEAR THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	3.33%	1.85%	1.48%	5.19%
B) NO	96.67%	1.85%	94.81%	98.52%

DID YOU NOTICE CROWDS OF PEOPLE NEAR THE POLLING STATION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	20.56%	4.17%	16.38%	24.73%
B) NO	79.44%	4.17%	75.27%	83.62%



# FINAL OBSERVATION REPORT



ASSESSMENT OF THE VOTING ATMOSPHERE	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) VERY GOOD	69.17%	4.77%	64.40%	73.94%
B) GOOD	30.56%	4.76%	25.80%	35.31%
C) PROBLEMATIC	0.28%	0.54%	-0.27%	0.82%
B) VERY PROBLEMATIC	0.00%	0.00%	0.00%	0.00%

EVALUATION OF THE IMPLEMENTATION OF THE PROCEDURES BY THE COMMISSIONERS	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) VERY GOOD	69.17%	4.77%	64.40%	73.94%
C) GOOD	28.89%	4.68%	24.21%	33.57%
B) PROBLEMATIC	1.94%	1.43%	0.52%	3.37%
B) VERY PROBLEMATIC	0.00%	0.00%	0.00%	0.00%

EVALUATION OF THE VOTERS' KNOWLEDGE OF THE VOTING RULES	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) VERY GOOD	33.15%	4.87%	28.28%	38.02%
C) GOOD	57.10%	5.12%	51.98%	62.22%
B) PROBLEMATIC	9.75%	3.07%	6.68%	12.82%
B) VERY PROBLEMATIC	0.28%	0.55%	-0.27%	0.82%

ASSESSMENT OF THE QUALIFICATION OF THE MEMBERS OF THE COMMISSION	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) VERY GOOD	55.56%	5.13%	50.42%	60.69%
C) GOOD	41.39%	5.09%	36.30%	46.48%
B) PROBLEMATIC	3.06%	1.78%	1.28%	4.83%
B) VERY PROBLEMATIC	0.00%	0.00%	0.00%	0.00%

WERE YOU HINDERED IN THE OBSERVATION PROCESS IN ANY WAY?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	11.11%	3.25%	7.86%	14.36%
B) NO	88.89%	3.25%	85.64%	92.14%

## SEPTEMBER 2020 - JANUARY 2022

## **CLOSURE OF VOTING CENTERS**

CLOSURE	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) VC WAS CLOSED BEFORE 19:00	3.89%	2.00%	1.89%	5.89%
B) VC WAS CLOSED ON TIME (19:00)	82.50%	3.93%	78.57%	86.43%
C) VC WAS CLOSED BETWEEN 19:00 AND 19:30	11.94%	3.35%	8.59%	15.29%
D) VC WAS CLOSED BETWEEN 19:30 AND 20:00	1.11%	1.08%	0.03%	2.19%
E) VC WAS CLOSED AFTER 20:00	0.56%	0.77%	-0.21%	1.32%

WERE THERE VOTERS IN QUEUE, WAITING TO VOTE AFTER 7PM?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	1.94%	1.43%	0.52%	3.37%
B) NO	98.06%	1.43%	96.63%	99.48%

DID YOU NOTICE THE VOTERS IN THE QUEUE, WHO HAD ARRIVED BEFORE 19:00 AND WERE NOT ALLOWED TO VOTE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	0.00%	0.00%	0.00%	0.00%
B) NO	100.00%	0.00%	100.00%	100.00%

DID YOU NOTICE VOTERS WHO CAME AFTER 19:00 AND WERE ALLOWED TO VOTE?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	1.11%	1.08%	0.03%	2.19%
B) NO	98.89%	1.08%	97.81%	99.97%

DID ALL MEMBERS OF THE COMMISSION AGREE TO CLOSE THE VOTING?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	97.22%	1.70%	95.52%	98.92%
B) NO	2.78%	1.70%	1.08%	4.48%

WERE THERE ANY UNAUTHORIZED PERSONS IN THE VOTING CENTER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	1.67%	1.32%	0.34%	2.99%
B) NO	98.33%	1.32%	97.01%	99.66%



## **FINAL OBSERVATION REPORT**



IF YOU NOTICED UNAUTHORIZED PERSONS AT THE POLLING STATION, WHO WERE THEY?	NUMBER
B) PARTY MEMBERS	3
C) OTHERS (EXPLAIN)	3

WERE THE BOXES OF ELECTION MATERIALS SEALED WITH THE SECURITY CODE UNDER THE SUPERVISION OF ALL MEMBERS OF THE COMMISSION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	99.44%	0.77%	98.68%	100.21%
B) NO	0.56%	0.77%	-0.21%	1.32%

THE NUMBER OF PERSONS WHO VOTED WAS TAKEN FROM THE PEI ACCORDING TO THE PROCEDURES?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
A) YES	97.50%	1.61%	95.89%	99.11%
B) NO	2.50%	1.61%	0.89%	4.11%

WERE THE UNUSED BALLOTS COUNTED?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	96.67%	1.85%	94.81%	98.52%	
B) NO	3.33%	1.85%	1.48%	5.19%	

WERE THE DAMAGED BALLOTS COUNTED?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	89.44%	3.17%	86.27%	92.62%	
B) NO	10.56%	3.17%	7.38%	13.73%	

DID ALL THE MEMBERS OF THE COMMISSION AGREE ON THE RESULTS OF THE COUNTS?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	100.00%	0.00%	100.00%	100.00%	
B) NO	0.00%	0.00%	0.00%	0.00%	

WERE ALL THE RESULTS AND DECISIONS TAKEN REFLECTED IN THE MINUTES?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	100.00%	0.05%	99.94%	100.05%	
B) NO	0.00%	0.05%	-0.05%	0.06%	

# OBSERVATION REPORT

WERE THE ENVELOPES WITH THE RELEVANT MATERIALS CLOSED AND SEALED IN THE PRESENCE OF ALL MEMBERS OF THE COMMISSION?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	100.00%	0.00%	100.00%	100.00%	
B) NO	0.00%	0.00%	0.00%	0.00%	

DID ALL COMMISSION MEMBERS AND OBSERVERS RECEIVE COPIES OF THE VOTING CLOSING MINUTES?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	82.50%	3.93%	78.57%	86.43%	
B) NO	17.50%	3.93%	13.57%	21.43%	

WERE ALL THE MATERIALS PROVIDED IN THE CODE ENTERED IN THE BALLOT BOX?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	99.72%	0.54%	99.18%	100.27%	
B) NO	0.28%	0.54%	-0.27%	0.82%	

IF ALL THE MATERIALS SPECIFIED IN THE CODE WERE NOT ENTERED IN THE BALLOT BOX, WHICH MATERIAL WAS NOT ENTERED?	NUMBER
K) MEETING PROTOCOL BOOK	1

DID THE POLICE OFFICER AND THE VAN THAT WOULD TRANSPORT THE MATERIALS SHOW UP ON TIME?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	97.50%	1.61%	95.89%	99.11%	
B) NO	2.50%	1.61%	0.89%	4.11%	

WERE THE MATERIALS ESCORTED TO THE BCC BY THE CHAIRMAN, THE SECRETARY OF THE CENTER AND THE POLICE OFFICER?	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD	
A) YES	100.00%	0.00%	100.00%	100.00%	
B) NO	0.00%	0.00%	0.00%	0.00%	

OVERALL ASSESSMENT OF THE PROCEDURES FOR CLOSING THE VOTING CENTER	PERCENTAGE	MARGIN OF ERROR	LOWER THRESHOLD	UPPER THRESHOLD
VERY GOOD	71.94%	4.64%	67.30%	76.59%
GOOD	26.94%	4.58%	22.36%	31.53%
PROBLEMATIC	1.11%	1.08%	0.03%	2.19%
VERY PROBLEMATIC	0.00%	0.00%	0.00%	0.00%

# FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022







# DEVIATION OF THE NUMBER OF SEATS PER NUMBER OF CITIZENS FROM THE NATIONAL AVERAGE FOR EACH CONSTITUENCY

The table shows the deviation from the national average of the number of seats for each constituency. The table presents the three possible combinations of allocation of seats for each constituency. The first column presents the partition of the mandates as currently foreseen by the Albanian Electoral Code, where the mandates are determined on the basis of the number of citizens for each constituency. Meanwhile, the second and third columns illustrate the division of seats by constituency if the seats were determined on the basis of the number of eligible voters and the number of voters who actually voted in the 2021 elections, respectively.

EL / SEAT ON 2021)	Deviation from average	-2.61%	16.45%	-2.98%	-0.11%	-3.72%	0.83%	0.45%	14.81%	-7.78%	-12.79%	13.41%	-25.14%	
EFFECTIVE ELECTOR MODEL / SEAT (BASED ON PARTICIPATION 2021)	Voted 2021 / Seat	11563.71429	13826.6	11520.14286	11860.57143	11431.625	11972	11927.09091	13631.33333	10949.85714	10354.27273	13465.80556	8888.666667	11873.38571
EFFECTIV (BASED	Voted 2021	80946	69133	161282	166048	182906	47888	131198	40894	76649	113897	484769	106664	1662274
EAT	Deviation from average	2.05%	2.38%	-0.04%	-3.33%	-1.67%	20.22%	0.84%	7.96%	-3.09%	-3.51%	-1.34%	3.51%	
ELECTOR MODEL / SEAT	Electors/ Seats	26159.85714	26245	25623.57143	24782	25205.5	30817.5	25851.18182	27675.66667	24842.71429	24734.36364	25291.5	26535.66667	25634.77857
ELECT	Electors	183119	131225	358730	346948	403288	123270	284363	83027	173899	272078	910494	318428	3588869
- S	Deviation from average	%98.0	7.06%	1.70%	-1.44%	-1.94%	13.72%	-2.11%	13.03%	-1.02%	-3.54%	-0.94%	-0.39%	
CURRENT MODEL (CITIZENS/ SEATS)	Citizens/ seats	32743.14286	34754.8	33014.42857	31996	31834.375	36917.5	31778.45455	36694.33333	32132.42857	31313.27273	32160.08333	32337.75	32464.12143
ច ច្	Citizens	229202	173774	462202	447944	509350	147670	349563	110083	224927	34446	1157763	388053	4544977
	Mandate	7	Ŋ	71	14	16	4	E	23	7	11	36	12	140
	COUNTY	Berat	Dibër	Durrës	Elbasan	Fier	Gjirokastër	Korçë	Kukës	Lezhë	Shkodër	Tiranë	Vlorë	TOTAL

### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

# OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

for parties that have not passed the electoral threshold or votes for parties that were close to the next mandate in a given district, but without reaching The table presents the percentage of unrepresented votes (of those who did not produce a mandate) by constituencies and electoral subjects. So, votes the threshold to get the next mandate.

**UNREPRESENTED VOTES** 

ANNEX

for Integration is the entity that has lost the most votes in these elections. It turns out that the votes cast for the SMI, but which have not managed to As shown in the table, it turns out that 7.9% of valid votes nationwide have not produced mandates. The Counties with the highest number of votes that did not produce mandates are Gjirokastra and Dibra, where the figure is close to of valid votes. Of the electoral subjects, the Socialist Movement produce mandates, reach 4.2%, while no other electoral subject exceeds 1%.

COUNTY	PS	PD- AN	ISI	PSD	3	LRE	Ŧ	ADR	PBK	PLDSH	ABEOK	8	Merxhani (independent candidate)	<b>Debreshi</b> (independent candidate)	Shehu (independent candidate)	Shkam bi (independent candidate)	Abazi (independent candidate)	
Berat	0.0%	8.1%	11.1%	0.5%	0.2%	0.3%	0.4%	0.2%	0.2%	0.2%	0.2%	0.3%						21.6%
Dibër	14.6%	0.0%	%6.9	0.7%	%9.0	0.2%	0.2%	0.2%	0.1%	0.1%	0.1%	0.2%		%6:0				24.8%
Durrës	0.0%	3.7%	6.2%	0.4%	0.2%	0.3%	0.4%	0.1%	0.1%	0.2%	0.1%	0.2%						12.0%
Elbasan	5.8%	0.0%	4.4%	0.4%	%9.0	0.2%	1.1%	0.1%	0.1%	0.1%	0.1%	0.5%						13.5%
Fier	0.0%	2.1%	1.2%	0.5%	0.2%	0.3%	0.5%	0.2%	0.1%	0.8%	0.1%	0.3%						6.2%
Gjirokastër	0.0%	12.7%	12.7%	1.2%	0.2%	0.1%	0.4%	0.1%	0.1%	0.2%	0.1%	0.1%	0.3%					28.2%
Korçë	%0:0	%0:0	%6.9	1.0%	0.2%	0.3%	%9.0	0.1%	0.1%	0.5%	0.1%	%9:0						10.4%
Kukës	4.7%	0.0%	0.2%	0.5%	0.2%	0.3%	0.1%	0.1%	0.2%	0.1%	%0.0	0.1%						%9.9
Lezhë	2.5%	0.0%	10.3%	0.4%	%9.0	0.5%	0.8%	0.2%	0.2%	0.5%	0.1%	0.4%			%9.0			17.0%
Shkodër	5.2%	5.7%	1.8%	%0.0	1.3%	0.1%	0.5%	0.1%	0.1%	0.2%	0.1%	%6:0				0.1%		16.2%
Tiranë	1.7%	0.0%	0.8%	0.2%	0.4%	0.2%	0.8%	0.4%	0.1%	0.2%	0.1%	0.5%					%9:0	6.1%
Vlorë	0.0%	2.6%	6.1%	%9.0	%6.0	0.2%	0.5%	0.1%	0.2%	0.1%	0.1%	1.7%						13.1%
Total	0.0%	%9:0	4.2%	0.3%	0.4%	0.2%	%9.0	0.2%	0.1%	0.3%	0.1%	0.5%	%0:0	%0:0	%0:0	%0:0	0.2%	7.9%



# FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022





# THE NUMBER OF VOTES A CANDIDATE SHOULD RECEIVE TO BREAK THE QUOTIENT AND BE REARRANGED IN THE LIST, BY CONSTITUENCIES AND ELECTORAL SUBJECTS.

Point 3 of Article 163 of the Electoral Code stipulates that "Mandates shall be first allocated to the candidates who have received a number of preferential votes higher than the quotient resulting from the division of the number of votes for the subject by the number of mandates won by the [same] subject ...".

The table below shows the number of votes a candidate would need to receive in order to benefit from this clause and be re-ranked in the list of candidates.

	PS	PD-AN	LSI	PSD
Berat	8.467	11.515*		
Dibër	14.371*	9.673		
Durrës	9.612	10.566*		
Elbasan	10.778*	9.646		
Fier	10.175*	10.780*	12.312*	
Gjirokastër	8.177	13.971*		
Korçë	10.091*	10.096*		
Kukës	13.856*	12.036*		
Lezhë	9.090	8.500		
Shkodër	10.099*	9.441	10.100*	8.213
Tiranë	12.602*	12.156*	13.973*	13.272*
Vlorë	7.378	8.032		

<sup>\*</sup> In all these cases, the quotient is 10,000, as point 3 of Article 163 stipulates that the quotient cannot be more than 10,000 votes.



# CANDIDATES WHO HAVE BROKEN THE QUOTIENT (REGARDLESS OF RANKING IN THE LIST)

The table below shows the list with the names of all candidates who break the quotient specified by the Electoral Code, which gave them the opportunity to be re-ranked in the list of candidates. The data show that the number of candidates who actually broke the quotient is very small and most of them were already on the winning list, so they were within the list of candidates for MSP who received seats in the respective constituency from the respective party.

Only eighteen of the deputies of the next Assembly managed to get enough votes to break the quotient set by law, 15 of whom were already on the winning list of the respective party. So it turned out that only three deputies were elected based on the preferential votes received, which makes the preferential vote almost totally unaffected by the names of future deputies.

				Number of votes	Re-ranked / in the winning list
1	Elbasan	PD-AN	Luçiano Boçi	10.930	Re-ranked
2	Lezhë	PD-AN	Kastriot Piroli	9.374	In the winning list
3	Tiranë	PD-AN	Lulzim Basha	16.195	In the winning list
4	Tiranë	PD-AN	Agron Shehaj	13.855	In the winning list
5	Tiranë	PD-AN	Belind Këlliçi	11.601	In the winning list
6	Berat	PS	Blendi Klosi	12.399	In the winning list
7	Durrës	PS	Edi Rama	15.871	In the winning list
8	Elbasan	PS	Saimir Hasalla	11.518	In the winning list
9	Elbasan	PS	Taulant Balla	21.604	In the winning list
10	Fier	PS	Erion Braçe	15.622	In the winning list
11	Fier	PS	Gramoz Ruçi	10.292	In the winning list
12	Gjirokastër	PS			In the winning list
13	Korçë	PS	Niko Peleshi	11.475	In the winning list
14	Tiranë	PS	Ornaldo Rakipi	15.697	Re-ranked
15	Tiranë	PS	Arben Ahmetaj	11.287	In the winning list
16	Tiranë	PS	Belinda Balluku	15.361	In the winning list
17	Tiranë	PS	Etjen Xhafaj	12.782	In the winning list
18	Tiranë	PS	Fatmir Xhafaj	16.738	Re-ranked
19*	Vlorë	PS	Edi Rama*	11.412	In the winning list

<sup>\*</sup> Prime Minister Rama accepted the mandate in Durrës Region, resigning from that of Vlora Region.



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# CANDIDATES WHO WOULD NOT HAVE BEEN MANDATED IF THE LISTS WERE TOTALLY OPEN AND THEIR REPLACEMENTS.

The following table lists the names of all future members of the Assembly, who would not have been mandated if the lists of candidates for deputies were totally open, i.e., there would be no quotient clause that conditions the reordering in the list, and deputies would be totally rearranged by preferential vote before the distribution of seats. The table also shows the name of the candidate for deputy who would be elected and win the mandate in their place.

With this assumption it results that 24 of the elected deputies of the Assembly (17.1%) would not be in the Assembly if the lists were fully open, and the will of the voters, expressed through the preferential vote, would be fully respected.

No.	County	Electoral subject	Mandated	Mandated if there were no quotient
1	Tiranë	LSI	Erisa Xhixho	Floida Kërpaçi
2	Tiranë	LSI	Petrit Vasili	Përparim Spahiu
3	Durrës	PD-AN	Merita Bakiu	Manjola Luku
4	Durrës	PD-AN	Oerd Bylykbashi	Igli Cara
5	Fier	PD-AN	Eralda Bano(Tase)	Elizabeta Rredhi
6	Fier	PD-AN	Nustret Avdulla	Agron Kapllanaj
7	Korçë	PD-AN	Sorina Koti	Marjeta Halili
8	Lezhë	PD-AN	Lindita Metaliaj	Elda Hoti
9	Shkodër	PD-AN	Emilja Koliqi	Izmira Rusi (Ulqinaku)
10	Shkodër	PD-AN	Ramadan Likaj	Bardh Spahia
11	Tiranë	PD-AN	Alfred Rushaj	Asllan Dogjani
12	Tiranë	PD-AN	Vangjel Dule	Petrit Doda
13	Tiranë	PD-AN	Mesila Doda	Orjela Nebijaj
14	Vlorë	PD-AN	Arbi Agalliu	Gëzim Ademaj
15	Dibër	PS	Lavdrim Krrashi	Dionis Imeraj
16	Elbasan	PS	Klevis Xhoxhi	Shkëlqim Bullari
17	Elbasan	PS	Florenc Spaho	Albana Hana
18	Fier	PS	Ismet Beqiraj	Mirela Pitushi
19	Fier	PS	Tatiana Piro	Adela Hysenaj
20	Tiranë	PS	Najada Çomo	Mimi Kodheli
21	Tiranë	PS	Arben Pëllumbi	Pandeli Majko
22	Tiranë	PS	Ermonela Valikaj	Dallëndyshe Bici
23	Shkodër	PSD	Gledis çeliku	Serdar Hoxha
24	Tiranë	PSD	Gertjan Deda	Besart Meta

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COALITION FOR REFORMS, INTEGRATION AND CONSOLIDATED INSTITUTIONS (KRIIK ALBANIA)

# **BSERVATION EPORT**

SEPTEMBER 2020 - JANUARY 2022

# ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

# PERCENTAGE OF VOTES THAT HAVE EXPRESSED A VALID PREFERENCE FOR CANDIDATES\*

ANNEX

than one candidate, making the vote technically valid, as the vote was calculated for the party and is included in this table, but is not included in the It is worth considering that the percentages are higher, as an unknown number of voters (statistics were not kept during the count) circled more percentage calculated for voters who have validly expressed the preferential vote for a candidate. This is because voters could only round up one The table below shows the percentage of voters who have expressed a preference for candidates. As can be seen from the table, the interest of voters for individual candidates, except for the political party, is high (over 70%), especially among the voters of the parties that have won seats in the Assembly. candidate from the respective party list.

County	PSD	S.	PD-AN	L <u>s</u>	3	L RE	Ë	ADR	PBK	PLDSH	ABEOK	8	TOTAL
Berat	54.9%	85.1%	80.8%	89.3%	54.7%	56.3%	51.4%	55.9%	48.4%	47.0%	46.7%	51.8%	60.2%
Dibër	58.3%	85.2%	85.3%	79.1%	75.1%	64.2%	%0.99	43.3%	58.9%	51.1%	42.9%	49.6%	63.2%
Durrës	42.8%	82.9%	82.9%	80.8%	56.5%	%6:09	61.3%	52.5%	50.0%	43.8%	45.5%	62.0%	60.2%
Elbasan	53.4%	83.4%	84.5%	87.7%	76.3%	54.3%	71.9%	57.8%	52.9%	55.1%	47.9%	75.0%	66.7%
Fier	56.5%	71.7%	81.1%	77.3%	62.3%	61.3%	%8'09	%6:09	55.0%	64.4%	34.1%	74.9%	63.4%
Gjirokastër	60.1%	83.4%	%6.92	73.9%	44.8%	43.9%	46.8%	48.5%	34.6%	46.3%	48.5%	35.7%	53.6%
Korçë	64.0%	84.9%	87.9%	82.0%	61.3%	64.0%	73.5%	58.3%	62.3%	67.3%	60.4%	77.6%	70.3%
Kukës	38.3%	80.1%	74.9%	34.4%	51.4%	36.6%	33.3%	44.7%	42.9%	26.8%	50.0%	47.1%	46.7%
Lezhë	58.9%	87.0%	84.8%	%6.88	%8.69	82.1%	59.2%	77.2%	54.1%	75.6%	73.3%	63.4%	72.9%
Shkodër	79.5%	84.6%	87.7%	62.7%	73.9%	63.5%	74.9%	57.9%	55.6%	62.0%	50.0%	80.8%	69.4%
Tiranë	83.2%	84.6%	81.0%	88.2%	70.8%	%0.99	79.3%	75.9%	59.4%	71.7%	65.6%	77.7%	75.3%
Vlorë	64.4%	82.9%	80.3%	88.1%	77.2%	29.6%	71.2%	52.2%	59.8%	54.4%	35.8%	81.3%	67.3%
Total	77.2%	82.7%	82.6%	82.3%	70.9%	62.5%	71.3%	%6.99	54.9%	63.5%	52.7%	75.7%	70.3%

# OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022



### PERFORMANCE OF VOTER LIST STATISTICAL DATA

The appendix presents the numerical data of the voter list according to the extracts generated by the General Directorate of Civil Status (DPGJC), according to the items described in the first column. The Electoral Code stipulates that immediately after the decree of the election date by the President of the Republic, the DPGJC must periodically publish every 30 days the extract of the voter list for each Municipality up to 40 days before election day, when the Final Voters List is published. All data grouped in the table are taken from official communication with the Ministry of Interior, as, unlike other election processes, they are not made public except for some general data, which are published irregularly by DPGJC officials.

No	Description	Extract of 03.10.2020	Extract of 01.11.2020	Extract of 03.12.2020	Extract of 02.01.2021	Extract of 31.01.2021	Extract of 28.02.2021	Final list of 15.03.2021
1	Total number of citizens with the right to vote:	3.608.169	3.606.036	3.602.377	3.597.890	3.582.986	3.587.453	3.588.869
	a. male	1.823.803	1.822.568	1.820.364	1.817.647	1.815.960	1.813.812	1.812.442
	b. female	1.784.169	1.783.468	1.782.013	1.780.243	1.778.912	1.777.319	1.776.427
2	Number of voters not included in the lists:	173.295	34.039	19.563	12.010	11.904	7.560	3.959
	a. Citizens over 100 years old	3.249	3.074	3.035	3.002	2.942	2.900	2.861
	b. Citizens not included according to instruction no. 225 dated 11.05.2016	940	940	1.017	1.111	989	982	1.098
	c. Others, part of Voting Centers (VCs) with out-of-limit voters	169.106	30.025	15.511	7.897	7.973	3.678	0
3	Number of voters on the list	3.434.874	3.571.997	3.582.814	3.585.880	3.582.986	3.587.453	3.588.869
4	Total number of Polling Stations	5.386	5.274	5.154	5.160	5.161	5.180	5.199
5	Number of VCs with over 1000 voters	106	17	6	3	4	1	0
6	Number of VCs with less than 300 voters	419	123	99	101	38	21	18
7	Number of voters with residential number 000, 888, 999	2.101	2.101	167	107	53	53	53

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

SEPTEMBER 2020 - JANUARY 2022



### **DISTRIBUTION OF INVALID VOTES BY MUNICIPALITIES**

The table shows the percentage of invalid votes by the country's municipalities. From the table it can be seen that the percentage of invalid votes for some municipalities deviates greatly from the national average of invalid votes (there are many more or fewer invalid votes).

It turns out that the municipalities that have the highest proportion of invalid votes are: Bulqiza, Pogradeci and Ura Vajgurore, while those that have the lowest percentage are: Himara, Tirana and Gjirokastra.

Municipality	Votes in the box	Invalid votes	Percentage of invalid votes	Deviation from the national average
Belsh	10,582	692	6.54%	1.54%
Berat	35,122	2,198	6.26%	1.26%
Bulqizë	15,408	1,362	8.84%	3.84%
Cërrik	14,973	847	5.66%	0.66%
Delvinë	5,279	320	6.06%	1.06%
Devoll	17,226	689	4.00%	-1.00%
Dibër	29,865	1,814	6.07%	1.08%
Divjakë	20,162	1,271	6.30%	1.31%
Dropull	2,952	183	6.20%	1.20%
Durrës	109,443	5,107	4.67%	-0.33%
Elbasan	81,896	4,652	5.68%	0.68%
Fier	72,111	3,227	4.48%	-0.52%
Finiq	4,253	278	6.54%	1.54%
Fushë-arrëz	4,250	258	6.07%	1.07%
Gjirokastër	19,638	712	3.63%	-1.37%
Gramsh	14,162	824	5.82%	0.82%
Has	8,016	488	6.09%	1.09%
Himarë	5,882	124	2.11%	-2.89%
Kamëz	54,046	2,585	4.78%	-0.21%
Kavajë	23,473	941	4.01%	-0.99%
Këlcyrë	3,597	186	5.17%	0.17%
Klos	8,596	644	7.49%	2.49%
Kolonjë	7,327	451	6.16%	1.16%
Konispol	4,194	273	6.51%	1.51%
Korçë	45,571	1,929	4.23%	-0.76%
Krujë	35,591	1,839	5.17%	0.17%
Kuçovë	17,773	1,052	5.92%	0.92%
Kukës	22,502	1,082	4.81%	-0.19%
Kurbin	25,758	1,835	7.12%	2.13%

# OBSERVATION REPORT

SEPTEMBER 2020 – JANUARY 2022

Municipality	Votes in the box	Invalid votes	Percentage of invalid votes	Deviation from the national average
			invalid votes	national average
Lezhë	37,770	2,509	6.64%	1.65%
Libohovë	2,485	142	5.71%	0.72%
Librazhd	17,605	1,243	7.06%	2.06%
Lushnjë	48,939	2,778	5.68%	0.68%
Malësi e Madhe	17,392	1,346	7.74%	2.74%
Maliq	24,724	1,423	5.76%	0.76%
Mallakastër	14,397	864	6.00%	1.00%
Mat	15,114	866	5.73%	0.73%
Memaliaj	6,274	411	6.55%	1.55%
Mirditë	13,120	602	4.59%	-0.41%
Patos	14,854	715	4.81%	-0.18%
Peqin	13,316	701	5.26%	0.27%
Përmet	6,756	356	5.27%	0.27%
Pogradec	34,733	2,810	8.09%	3.09%
Poliçan	6,225	357	5.73%	0.74%
Prrenjas	13,399	816	6.09%	1.09%
Pukë	6,350	350	5.51%	0.51%
Pustec	1,606	73	4.55%	-0.45%
Roskovec	12,437	520	4.18%	-0.82%
Rrogozhinë	11,124	546	4.91%	-0.09%
Sarandë	15,698	768	4.89%	-O.11%
Selenicë	10,329	517	5.01%	0.01%
Shijak	15,821	862	5.45%	0.45%
Shkodër	69,350	3,232	4.66%	-0.34%
Skrapar	7,057	427	6.05%	1.05%
Tepelenë	6,178	320	5.18%	0.18%
Tiranë	379,339	13,559	3.57%	-1.42%
Tropojë	10,326	618	5.98%	0.99%
Ura vajgurore	14,752	1,258	8.53%	3.53%
Vau i Dejës	16,553	926	5.59%	0.60%
Vlorë	61,018	2,450	4.02%	-0.98%
Vorë	16,498	791	4.79%	-0.20%
TOTAL	1,661,187	83,019	5.00%	

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

# FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022





# DISMISSALS AND APPOINTMENTS IN THE BODY OF ZONAL ELECTION ADMINISTRATION COMMISSIONS

The following table contains all the changes in the membership of the Zonal Election Administration Commissions (CEAZs) from their constitution until the end of their term as members of the respective CEAZ. In the composition of the CEAZs in the election process of April 25, there were 7 members and one secretary. The data included in the table refer to the decision-making of the CEC, and include: CEAZ number; The county where it is located; name, surname, gender and position of the persons replaced and those who replace them; the political party that proposed them; as well as the number and date of the CEC decision through which the replacement was approved.

No.	County	CEAZ	Dismissed	Gender	Nominated	Gender	Position	Subject	Decision
1	Korçë	75	Mikail Mejdi	М	Esmeraldo Kasolli	М	Member	PD	No. 23 dated 02.02.2021
2	Vlorë	88	Geljon Dedi	М	Marin Suli	М	Secretary	PD	No. 23 dated 02.02.2021
3	Korçë	72	Shkëlqim Cane	М	Bledar Topçiu	М	Member	LSI	No. 49 dated 11.02.2021
4	Gjirokastër	77	Elton Qafa	М	Zaim Muka	М	Member	LSI	No. 49 dated 11.02.2021
5	Gjirokastër	81	Jaho Bilibashi	М	Agron Gaba	М	Member	PD	No. 49 dated 11.02.2021
6	Gjirokastër	81	Aldi Brinja	М	Lorena Ruçi	F	Member	PD	No. 49 dated 11.02.2021
7	Gjirokastër	82	Lorena Ruçi	F	Mihal Mano	М	Member	PD	No. 49 dated 11.02.2021
8	Gjirokastër	82	Mihal Mano	М	Artan Aliko	М	Secretary	PD	No. 49 dated 11.02.2021
9	Tiranë	34	Denis Preci	М	Gerald Zotaj	М	Member	PSD	No. 110 dated 02.03.2021
10	Tiranë	37	Marpol Koço	М	Edison Zanaj	М	Member	PSD	No. 110 dated 02.03.2021
11	Tiranë	43	Valmira Troka	F	Valbona Dushku	F	Member	PSD	No. 110 dated 02.03.2021
12	Elbasan	45	Dylber Dervishi	М	Adrian Zekthi	М	Member	LSI	No. 110 dated 02.03.2021
13	Vlorë	87	Emanuele Jaho	М	Xhelal Hodaj	М	Member	LSI	No. 110 dated 02.03.2021
14	Shkodër	7	Samet Guri	М	Gjelosh Gugaj	М	Member	LSI	No. 142 dated 15.03.2021
15	Kukës	9	Klodjana Aliaj	F	Ergent Gjongecaj	М	Member	PS	No. 142 dated 15.03.2021
16	Durrës	23	Berinda Bulku	F	Aleksandër Ndrejaj	М	Member	LSI	No. 142 dated 15.03.2021
17	Tiranë	32	Adrianela Haranlli	F	Gustiana Çakri	F	Member	PSD	No. 142 dated 15.03.2021
18	Fier	55	Ergest Krakulli	М	Muharem Sharka	М	Member	PS	No. 142 dated 15.03.2021
19	Berat	63	Shkelqim Tafa	М	Marius Pajo	М	Member	LSI	No. 142 dated 15.03.2021
20	Korçë	71	Oandi Jani	М	Tanja Kitani	F	Member	LSI	No. 142 dated 15.03.2021
21	Korçë	75	Ergin Çikopana	М	Tomor Azis	М	Member	LSI	No. 142 dated 15.03.2021
22	Korçë	75	Ermal Zylfo	М	Ardit Shpati	М	Member	PSD	No. 142 dated 15.03.2021

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

# OBSERVATION REPORT

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No.	County	CEAZ	Dismissed	Gender	Nominated	Gender	Position	Subject	Decision
23	Vlorë	91	Paola Maçi	F	Qemal Shena	М	Member	LSI	No. 142 dated 15.03.2021
24	Shkodër	2	Oltion Drabeja	М	Agostin Ndrevashaj	М	Member	LSI	No. 169 dated 18.03.2021
25	Shkodër	4	Klodjan Nasa	М	Jetmir Gjokaj	М	Member	LSI	No. 169 dated 18.03.2021
26	Tiranë	29	Marsela Lekli	F	Elisabeta Gjoka	F	Member	LSI	No. 169 dated 18.03.2021
27	Tiranë	30	Ada Tola	F	Indrit Meta	М	Member	PSD	No. 169 dated 18.03.2021
28	Tiranë	37	Besart Logu	М	Renald Rista	М	Member	PD	No. 169 dated 18.03.2021
29	Korçë	74	Edmond Çajku	М	Dhimitri Çyfeku	М	Member	PD	No. 169 dated 18.03.2021
30	Gjirokastër	77	Kleanthi Gjika	М	Zaim Muka	М	Member	LSI	No. 169 dated 18.03.2021
31	Shkodër	1	Fatmir Shpellzaj	М	Besim Hyseni	М	Member	LSI	No. 179 dated 23.03.2021
32	Shkodër	7	Ded Mema	М	Alketa Gjini	F	Secretary	PS	No. 179 dated 23.03.2021
33	Shkodër	7	Petrit Dedaj	М	Besmira Aliaj	F	Member	PS	No. 179 dated 23.03.2021
34	Shkodër	8	Alfred Thekna	М	Marsida Demuçaj	F	Secretary	PD	No. 179 dated 23.03.2021
35	Shkodër	8	Pal Peraj	М	Alfosn Tuci	М	Member	PS	No. 179 dated 23.03.2021
36	Kukës	10	Selman Qena	М	Besim Dani	М	Member	PS	No. 179 dated 23.03.2021
37	Lezhë	12	Fran Lleshi	М	Eduart Karaçi	М	Secretary	PD	No. 179 dated 23.03.2021
38	Lezhë	15	Estri Keci	М	Ermal Meraj	М	Secretary	PS	No. 179 dated 23.03.2021
39	Tiranë	27	Gentian Biçukaj	М	Arjon Bistri	М	Secretary	PS	No. 179 dated 23.03.2021
40	Tiranë	27	Eralda Çerpia	F	Brunilda Balliu	F	Member	PS	No. 179 dated 23.03.2021
41	Tiranë	28	Frenkli Prengaj	М	Flogerta Kallabani	F	Member	LSI	No. 179 dated 23.03.2021
42	Tiranë	32	Ermir Bego	М	Maluen Hoxha	М	Member	LSI	No. 179 dated 23.03.2021
43	Tiranë	36	Hate Çela	F	Onelda Zefi	F	Member	PD	No. 179 dated 23.03.2021
44	Tiranë	37	Doriana Mihaj	F	Lekë Njbza	М	Member	PS	No. 179 dated 23.03.2021
45	Gjirokastër	76	Florand Hasani	М	Anila Dhimitri	F	Member	PS	No. 179 dated 23.03.2021
46	Kukës	9	Kujtim Rexha	М	Blerant Lushaj	М	Member	PS	No. 195 dated 31.03.2021
47	Kukës	9	Sedin Ahmagjokaj	М	Kujtim Rexha	М	Member	PS	No. 195 dated 31.03.2021
48	Kukës	11	Sahit Doçi	М	Dëfrim Korbi	М	Member	PS	No. 195 dated 31.03.2021
49	Kukës	11	Shefki Germizi	М	Endrit Dida	М	Secretary	PS	No. 195 dated 31.03.2021
50	Kukës	11	Fasli Germizi	М	Ilir Nerguti	М	Member	PD	No. 195 dated 31.03.2021
51	Lezhë	15	Klodiana Kolici	F	Alma Nikolli	F	Member	PS	No. 195 dated 31.03.2021
52	Tiranë	29	Armand Llusku	М	Arlind Cara	М	Member	PSD	No. 195 dated 31.03.2021

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# FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

No.	County	CEAZ	Dismissed	Gender	Nominated	Gender	Position	Subject	Decision
53	Tiranë	33	Aida Oruci	F	Jasmina Kuci	F	Member	PSD	No. 195 dated 31.03.2021
54	Tiranë	36	Erlis Hereni	М	Ervis Berberi	М	Member	PS	No. 195 dated 31.03.2021
55	Tiranë	36	Anastas Meçi	М	Laureta Omeri	F	Member	PS	No. 195 dated 31.03.2021
56	Tiranë	36	Ilir Tërthorja	М	Erlind Bregu	М	Member	PSD	No. 195 dated 31.03.2021
57	Tiranë	39	Ilir Topi	М	Aurel Çuku	М	Member	PS	No. 195 dated 31.03.2021
58	Tiranë	40	Paola Shllaku	F	Gjergj Pashaj	М	Member	PSD	No. 195 dated 31.03.2021
59	Elbasan	44	Hermes Gjinishi	М	Aldi Juba	М	Member	LSI	No. 195 dated 31.03.2021
60	Fier	57	Ridvan Brakaj	М	Besnik Doko	М	Member	LSI	No. 195 dated 31.03.2021
61	Fier	58	Arnold Petriti	М	Fatos Sheshi	М	Member	LSI	No. 195 dated 31.03.2021
62	Fier	60	Fatos Sheshi	М	Vladimir Pajo	М	Member	LSI	No. 195 dated 31.03.2021
63	Korçë	70	Rolandi Tabaku	М	Kevin Shkëmbi	М	Member	PSD	No. 195 dated 31.03.2021
64	Korçë	74	Kristo Kodra	М	Jola Pano	F	Member	PSD	No. 195 dated 31.03.2021
65	Korçë	75	Agim Shpati	М	Nexhad Memo	М	Member	PSD	No. 195 dated 31.03.2021
66	Tiranë	36	Erlind Bregu	М	Ceno Klosi	М	Member	PSD	No. 199 dated 01.04.2021
67	Shkodër	7	Alketa Gjini	F	Elsa Frroku	F	Secretary	PS	No. 204 dated 07.04.2021
68	Tiranë	27	Arben Muja	М	Sokol Ndreu	М	Member	PD	No. 204 dated 07.04.2021
69	Tiranë	27	Dhimitër Vata	М	Vendim Demaj	М	Member	PD	No. 204 dated 07.04.2021
70	Tiranë	27	Qemal Çajku	М	Atli Hoti	М	Member	PD	No. 204 dated 07.04.2021
71	Tiranë	41	Astrit Gjergji	М	Suzana Asllani	F	Member	LSI	No. 204 dated 07.04.2021
72	Elbasan	49	Megi Balliu	F	Renato Kusi	М	Member	PD	No. 204 dated 07.04.2021
73	Elbasan	50	Klevis Kallajxhiu	М	Silvana Todri	F	Member	LSI	No. 204 dated 07.04.2021
74	Fier	61	Ramadan Tabaku	М	Besa Hyka	F	Member	LSI	No. 204 dated 07.04.2021
75	Gjirokastër	80	Ziliha Danaj	F	Nie Shalari	F	Member	PS	No. 204 dated 07.04.2021
76	Vlorë	83	Aulona Haxhiaj	F	Ervin Shakaj	М	Member Deputy Chairman	PS	No. 204 dated 07.04.2021
77	Vlorë	83	Ervin Shakaj	М	Besnik Stefa	М	Member	PS	No. 204 dated 07.04.2021
78	Vlorë	83	Ilir Jaho	М	Olta Ganaj	F	Member	PS	No. 204 dated 07.04.2021
79	Vlorë	84	Vullnet Ibrahimi	М	Shpëtim Gjika	М	Member (chairman)	PS	No. 204 dated 07.04.2021
80	Vlorë	84	Dorion Xhelili	М	Vullnet ibrahimi	М	Member	PS	No. 204 dated 07.04.2021
81	Vlorë	85	Ahmet Sakaj	М	Dorian Xhelili	М	Member	PS	No. 204 dated 07.04.2021
82	Vlorë	86	Brunilda Saliaj	F	Laureta Jatagani	F	Member	PS	No. 204 dated 07.04.2021
83	Vlorë	84	Atird Hoxha	М	Viktor Bezhani	М	Secretary	PD	No. 204 dated 07.04.2021
84	Vlorë	85	Nada Daullja	F	Rezarta Moçka	F	Member	PD	No. 204 dated 07.04.2021
85	Shkodër	3	Oresti Vuçaj	М	Ilir Gojani	М	Member	LSI	No. 214 dated 09.04.2021

### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

**REPORT** 

No.	County	CEAZ	Dismissed	Gender	Nominated	Gender	Position	Subject	Decision
86	Lezhë	13	Oljana Moriseni	F	Keler Sufja	М	Membere vice chairman	PS	No. 214 dated 09.04.2021
87	Durrës	22	Elidon Repçe	М	Enis Vllamasi	М	Member	LSI	No. 214 dated 09.04.2021
88	Durrës	24	Borudina Braka	F	Nestor Memsuri	М	Membere	LSI	No. 214 dated 09.04.2021
89	Tiranë	27	Arjon Bistri	М	Leonard Muskaj	М	Secretary	PS	No. 214 dated 09.04.2021
90	Tiranë	27	Leonard Muskaj	М	Arjon Bistri	М	Member Deputy Chairman	PS	No. 214 dated 09.04.2021
91	Gjirokastër	82	Gligori Dushi	М	Matilda Gushi	F	Member Deputy Chairman	PS	No. 214 dated 09.04.2021
92	Vlorë	84	Vullnet Ibrahimi	М	Petro Thanasko	М	Member	PS	No. 214 dated 09.04.2021
93	Durrës	22	Bruno Stërmasi	М	Dorilda Mara	F	Secretary	PD	No. 226 dated 13.04.2021
94	Durrës	24	Ermal Lamaj	М	Krenar Bardhi	М	Member	PS	No. 226 dated 13.04.2021
95	Tiranë	26	Mirjeta Mema	F	Debora Isaj	F	Membere	PS	No. 226 dated 13.04.2021
96	Tiranë	26	Saimir Alushi	М	Eduart Kajmaku	М	Member	PS	No. 226 dated 13.04.2021
97	Tiranë	26	Arlind Papa	М	Duat Buraj	М	Member/ chairman	PS	No. 226 dated 13.04.2021
98	Korçë	72	Eduart Hajdërlli	М	Altin Hoxha	М	Member/ Deputy Chairman	PD	No. 226 dated 13.04.2021
99	Korçë	72	Taulant Turabi	М	Gentian Demçolli	М	Member	PD	No. 226 dated 13.04.2021
100	Shkodër	2	Ermira Hoxha	М	Shpresa Tepelija	F	Membere	PD	No. 254 dated 20.04.2021
101	Shkodër	3	Klaus Bardelli	М	Sadi Mezaj	М	Member	PD	No. 254 dated 20.04.2021
102	Shkodër	4	Seida Shega	F	Romina Kali	F	Secretary	PD	No. 254 dated 20.04.2021
103	Shkodër	4	Antonja Matija	F	Spartak Dibra	М	Member	PS	No. 254 dated 20.04.2021
104	Tiranë	27	Leonard Muskaj	М	Robiana Llanaj	F	Secretary	PS	No. 254 dated 20.04.2021
105	Tiranë	28	Mevlad Shehu	М	Bledar Aliaj	М	Member	PS	No. 254 dated 20.04.2021
106	Tiranë	29	Arlind Cara	М	Bestjan Cara	М	Member	PSD	No. 254 dated 20.04.2021
107	Tiranë	34	Florian Fregjaj	М	Genard Kastrati	М	Member	PD	No. 254 dated 20.04.2021
108	Tiranë	39	Jona Josifi	F	Jonid Collaku	М	Secretary	PS	No. 254 dated 20.04.2021
109	Korçë	72	Erion Laloti	М	Agron Begolli	М	Member	PSD	No. 254 dated 20.04.2021
110	Korçë	74	Edmond Cajku	М	Aurel Bacolli	М	Secretary	PD	No. 254 dated 20.04.2021
111	Korçë	74	Jola Pano	F	Mihal Spiro	М	Member	PSD	No. 254 dated 20.04.2021
112	Gjirokastër	80	Leonard Muho	М	Elisa Tufa	F	Member	PS	No. 254 dated 20.04.2021
113	Vlorë	88	Resmie Caushaj	F	Elpiniqi Bollano	F	Membere	LSI	No. 254 dated 20.04.2021
114	Shkodër	4	Sabina Denaj	F	Armando Sheqeri	М	Member	PS	No. 275 dated 22.04.2021
115	Shkodër	5	Ardian Beqiri	М	Ermira Ymeraj	F	Member	PS	No. 275 dated 22.04.2021
116	Shkodër	5	Morena Tirana	F	Ilir Dibra	М	Secretary	PS	No. 275 dated 22.04.2021
117	Lezhë	12	Simonela Florini	F	Sokol Kocaj	М	Member	PS	No. 275 dated 22.04.2021
118	Lezhë	14	Aleksander Lushi	М	Valentin Bardhoku	М	Member	PS	No. 275 dated 22.04.2021



## **FINAL OBSERVATION REPORT**



119	No.	County	CEAZ	Dismissed	Gender	Nominated	Gender	Position	Subject	Decision
121	119	Fier	59	Endri Beshani	М	Florian Mucaj	М	Member	PS	
	120	Berat	63	Bledar Malaj	М	Avdulla Salillari	М	Member	PS	
122	121	Vlorë	92	Xhuliana Hajna	F	Ilia Lokoshi	М	Member	LSI	
124	122	Shkodër	2	Shpresa Tepelija	F	Ermira Hoxhaj	F	Membere	PD	
125   Durrés   24	123	Shkodër	4	Romina Kali	F	Elmira Nehani	F	Secretary	PD	
126	124	Shkodër	5	Ardjan Brunga	М	Gentian Ibroja	М	Member	PD	
127   Tirané   39	125	Durrës	24	Ledja Shtufi	F	Leonard Garuli	М	Member	PD	
128	126	Tiranë	39	Jona Josifi	F	Arlind Gjokuta	М	Member	PS	
129   Tiranê   27   Sokol Ndreu   M   Vendim Demaj   M   Kryetar   PD   23.04.2021	127	Tiranë	39	Joana Duro	F	Jonida Collaku	F	Secretary	PS	
173	128	Fier	56	Erjon Sina	М	Indrit Sefa	М	Member	PD	
131   Tiranê   27   Vendin Denaj   M   Sokol Noreu   M   Member   PD   23.04.2021     132   Elbasan   46   Edvin Madhi   M   Edison Baxhija   M   Member   PS   No. 291 dated     23.04.2021     133   Fier   58   Fatos Sheshi   M   Alket Shkembi   M   Member   LSI   No. 291 dated     23.04.2021     134   Vlorê   88   Roland Gjini   M   Harallamb Brigo   M   Member   PD   No. 291 dated     23.04.2021     135   Tiranê   34   Eduart Gjermeni   M   Donald Shkreli   M   Secretary   PD   No. 294 dated     23.04.2021     136   Vlorê   88   Irina Bejtja   F   Andri Dhima   M   Member   PS   No. 294 dated     24.04.2021     137   Vlorê   88   Andri Dhima   M   Ilia Gjicali   M   Kryetar   PS   No. 294 dated     24.04.2021     138   Berat   66   Agron Isufi   M   Shpetim Bendaj   M   Secretary   PD   No. 295 dated     24.04.2021     139   Gjirokastër   80   Elisa Tefa   F   Ilijaz Memushi   M   Member   PS   No. 296 dated     24.04.2021     140   Gjirokastër   80   Ilijaz Memushi   M   Elisa Tefa   F   Member   PS   No. 296 dated     25.04.2021     141   Lezhê   15   Alma Nikolli   F   Dritan Preci   M   Member   PS   No. 297 dated     25.04.2021     142   Lezhê   13   Mark Lleshi   M   Florian Sulaj   M   Kryetar   PD   No. 301 dated     25.04.2021     143   Lezhê   15   Ardjan Reci   M   Enkelejda Reci   F   Member   PD   No. 301 dated     25.04.2021     144   Fier   56   Bledar Ndoni   M   Dorjan Spaho   M   Kryetar   PS   No. 302 dated     26.04.2021     145   Fier   59   Kledjus Ahmeti   M   Arjan Dosti   M   Member   PS   No. 303 dated     26.04.2021     146   Berat   66   Krenar Suku   M   Kozeta Nushi   F   Kryetar   PS   No. 304 dated     26.04.2021     147   Berat   66   Krenar Suku   M   Kozeta Nushi   F   Kryetar   PS   No. 303 dated     27.04.2021     148   Durrës   23   Gentjan Spiro   M   Cezar Beja   M   Kryetar   PS   No. 303 dated     27.04.2021	129	Tiranë	27	Sokol Ndreu	М	Vendim Demaj	М	Kryetar	PD	
132	130	Tiranë	27	Vendim Demaj	М	Sokol Ndreu	М	Member	PD	
132   Elossan   46   Edvin Madni   M   Edison Baxhija   M   Member   PS   23.04.2021     133   Fier   58   Fatos Sheshi   M   Alket Shkembi   M   Member   LSI   No. 291 dated     23.04.2021     134   Vlorë   88   Roland Gjini   M   Harallamb Brigo   M   Member   PD   No. 291 dated     23.04.2021     135   Tiranë   34   Eduart Gjermeni   M   Donald Shkreli   M   Secretary   PD   No. 291 dated     23.04.2021     136   Vlorë   88   Irina Bejtja   F   Andri Dhima   M   Member   PS   No. 294 dated     24.04.2021     137   Vlorë   88   Andri Dhima   M   Ilia Gjicali   M   Kryetar   PS   No. 294 dated     24.04.2021     138   Berat   66   Agron Isufi   M   Shpetim Bendaj   M   Secretary   PD   No. 295 dated     24.04.2021     139   Gjirokastër   80   Elisa Tefa   F   Iljaz Memushi   M   Member   PS   No. 296 dated     24.04.2021     140   Gjirokastër   80   Iljaz Memushi   M   Elisa Tefa   F   Member   PS   No. 297 dated     25.04.2021     141   Lezhë   15   Alma Nikolli   F   Dritan Preci   M   Member   PS   No. 299 dated     25.04.2021     142   Lezhë   13   Mark Lleshi   M   Florian Sulaj   M   Kryetar   PD   No. 301 dated     25.04.2021     143   Lezhë   15   Ardjan Reci   M   Enkelejda Reci   F   Member   PD   No. 301 dated     25.04.2021     144   Fier   56   Bledar Ndoni   M   Dorjan Spaho   M   Kryetar   PS   No. 302 dated     26.04.2021     145   Fier   59   Kledjus Ahmeti   M   Arjan Dosti   M   Member   PS   No. 302 dated     26.04.2021     146   Berat   66   Krenar Suku   M   Kozeta Nushi   F   Kryetar   PS   No. 303 dated     26.04.2021     148   Durrës   23   Gentjan Spiro   M   Cezar Beja   M   Kryetar   PD   No. 303 dated     27.04.2021     149   Tiranë   34   Gerald Zotaj   M   Agron Prekperaj   M   Member   PSD   No. 327 dated     27.04.2021     28.04   PSD   No. 327 dated     27.04.2021     28.04   PSD   No. 327 dated     28.04   PSD   No.	131	Tiranë	42	Marinela Alia	F	Irma Dmrozi	F	Member	PS	
134   Vlorë   88	132	Elbasan	46	Edvin Madhi	М	Edison Baxhija	М	Member	PS	
135	133	Fier	58	Fatos Sheshi	М	Alket Shkembi	М	Member	LSI	
136	134	Vlorë	88	Roland Gjini	М	Harallamb Brigo	М	Member	PD	
137	135	Tiranë	34	Eduart Gjermeni	М	Donald Shkreli	М	Secretary	PD	
137   Viore   88   Andri Dhima   M   Ilia Gjicali   M   Kryetar   PS   24,04,2021     138   Berat   66   Agron Isufi   M   Shpetim Bendaj   M   Secretary   PD   No. 295 dated     24,04,2021     139   Gjirokastër   80   Elisa Tefa   F   Iljaz Memushi   M   Member   PS   No. 296 dated     24,04,2021     140   Gjirokastër   80   Iljaz Memushi   M   Elisa Tefa   F   Member   PS   No. 297 dated     25,04,2021     141   Lezhë   15   Alma Nikolli   F   Dritan Preci   M   Member   PS   No. 299 dated     25,04,2021     142   Lezhë   13   Mark Lleshi   M   Florian Sulaj   M   Kryetar   PD   No. 301 dated     25,04,2021     143   Lezhë   15   Ardjan Reci   M   Enkelejda Reci   F   Member   PD   No. 301 dated     25,04,2021     144   Fier   56   Bledar Ndoni   M   Dorjan Spaho   M   Kryetar   PS   No. 302 dated     26,04,2021     145   Fier   59   Kledjus Ahmeti   M   Arjan Dosti   M   Member   PS   No. 303 dated     26,04,2021     146   Berat   65   Kozeta Nushi   F   Elton Kulla   M   Member   PS   No. 304 dated     26,04,2021     147   Berat   66   Krenar Suku   M   Kozeta Nushi   F   Kryetar   PS   No. 303 dated     26,04,2021     148   Durrës   23   Gentjan Spiro   M   Cezar Beja   M   Kryetar   PD   No. 323 dated     27,04,2021     149   Tiranë   34   Gerald Zotaj   M   Agron Prekperaj   M   Member   PSD   No. 327 dated     27,04,2021   No. 327 dated     28   No. 327 dated   No. 327 dated     29   No. 327 dated   No. 327 dated     20   Durrës   23   Shpetin Ciliu   M   Agron Prekperaj   M   Member   PSD   No. 327 dated     20   No. 327 dated   No. 327 dated     20   Durrës   23   Shpetin Ciliu   M   Agron Prekperaj   M   Member   PSD   No. 327 dated     20   No. 327 dated   No. 327 dated     20   No. 327 date	136	Vlorë	88	Irina Bejtja	F	Andri Dhima	М	Member	PS	
139   Gjirokastër   80   Elisa Tefa   F   Iljaz Memushi   M   Member   PS   No. 296 dated 24.04.2021     140   Gjirokastër   80   Iljaz Memushi   M   Elisa Tefa   F   Member   PS   No. 297 dated 25.04.2021     141   Lezhë   15   Alma Nikolli   F   Dritan Preci   M   Member   PS   No. 299 dated 25.04.2021     142   Lezhë   13   Mark Lleshi   M   Florian Sulaj   M   Kryetar   PD   No. 301 dated 25.04.2021     143   Lezhë   15   Ardjan Reci   M   Enkelejda Reci   F   Member   PD   No. 301 dated 25.04.2021     144   Fier   56   Bledar Ndoni   M   Dorjan Spaho   M   Kryetar   PS   No. 302 dated 26.04.2021     145   Fier   59   Kledjus Ahmeti   M   Arjan Dosti   M   Member   PS   No. 303 dated 26.04.2021     146   Berat   65   Kozeta Nushi   F   Elton Kulla   M   Member   PS   No. 304 dated 26.04.2021     147   Berat   66   Krenar Suku   M   Kozeta Nushi   F   Kryetar   PS   No. 304 dated 26.04.2021     148   Durrës   23   Gentjan Spiro   M   Cezar Beja   M   Kryetar   PD   No. 323 dated 27.04.2021     149   Tiranë   34   Gerald Zotaj   M   Agron Prekperaj   M   Member   PSD   No. 324 dated 27.04.2021     150   Durrës   23   Shpetim Ciku   M   Agron Prekperaj   M   Member   PSD   No. 327 dated 27.04.2021     160   Durrës   23   Shpetim Ciku   M   Agron Prekperaj   M   Kryetar   PS   No. 327 dated 27.04.2021     160   Durrës   23   Shpetim Ciku   M   Agron Prekperaj   M   Kryetar   PS   No. 327 dated 27.04.2021     160   Durrës   23   Shpetim Ciku   M   Agron Prekperaj   M   Kryetar   PS   No. 327 dated 27.04.2021     160   Durrës   23   Shpetim Ciku   M   Agron Prekperaj   M   Kryetar   PS   No. 327 dated 27.04.2021	137	Vlorë	88	Andri Dhima	М	Ilia Gjicali	М	Kryetar	PS	
140   Gjirokastër   80   Iljaz Memushi   M   Elisa Tefa   F   Member   PS   No. 297 dated 25.04.2021     141	138	Berat	66	Agron Isufi	М	Shpetim Bendaj	М	Secretary	PD	
140   Gjirokaster   80   Ilja2 Methustii   M   Elisa leta   F   Methber   PS   25.04.2021     141   Lezhë   15   Alma Nikollii   F   Dritan Preci   M   Member   PS   No. 299 dated   25.04.2021     142   Lezhë   13   Mark Lleshi   M   Florian Sulaj   M   Kryetar   PD   No. 301 dated   25.04.2021     143   Lezhë   15   Ardjan Reci   M   Enkelejda Reci   F   Member   PD   No. 301 dated   25.04.2021     144   Fier   56   Bledar Ndoni   M   Dorjan Spaho   M   Kryetar   PS   No. 302 dated   26.04.2021     145   Fier   59   Kledjus Ahmeti   M   Arjan Dosti   M   Member   PS   No. 303 dated   26.04.2021     146   Berat   65   Kozeta Nushi   F   Elton Kulla   M   Member   PS   No. 304 dated   26.04.2021     147   Berat   66   Krenar Suku   M   Kozeta Nushi   F   Kryetar   PS   No. 304 dated   26.04.2021     148   Durrës   23   Gentjan Spiro   M   Cezar Beja   M   Kryetar   PD   No. 323 dated   27.04.2021     149   Tiranë   34   Gerald Zotaj   M   Agron Prekperaj   M   Member   PSD   No. 327 dated   27.04.2021     150   Durrës   23   Shootim Ciku   M   Ani Dyrmichi   M   Kryetar   PS   No. 327 dated   27.04.2021     150   Durrës   23   Shootim Ciku   M   Ani Dyrmichi   M   Kryetar   PS   No. 327 dated   27.04.2021	139	Gjirokastër	80	Elisa Tefa	F	Iljaz Memushi	М	Member	PS	
141         Lezhie         15         Alfilia Nikolii         F         Dritali Preci         M         Member         PS         25.04.2021           142         Lezhie         13         Mark Lleshi         M         Florian Sulaj         M         Kryetar         PD         No. 301 dated 25.04.2021           143         Lezhie         15         Ardjan Reci         M         Enkelejda Reci         F         Member         PD         No. 301 dated 25.04.2021           144         Fier         56         Bledar Ndoni         M         Dorjan Spaho         M         Kryetar         PS         No. 302 dated 26.04.2021           145         Fier         59         Kledjus Ahmeti         M         Arjan Dosti         M         Member         PS         No. 303 dated 26.04.2021           146         Berat         65         Kozeta Nushi         F         Elton Kulla         M         Member         PS         No. 304 dated 26.04.2021           147         Berat         66         Krenar Suku         M         Kozeta Nushi         F         Kryetar         PS         No. 323 dated 26.04.2021           148         Durrës         23         Gentjan Spiro         M         Agron Prekperaj         M	140	Gjirokastër	80	Iljaz Memushi	М	Elisa Tefa	F	Member	PS	
142         Lezhe         15         Mark Lieshi         M         Florian Sulaj         M         Kryetar         PD         25.04.2021           143         Lezhë         15         Ardjan Reci         M         Enkelejda Reci         F         Member         PD         No. 301 dated 25.04.2021           144         Fier         56         Bledar Ndoni         M         Dorjan Spaho         M         Kryetar         PS         No. 302 dated 26.04.2021           145         Fier         59         Kledjus Ahmeti         M         Arjan Dosti         M         Member         PS         No. 303 dated 26.04.2021           146         Berat         65         Kozeta Nushi         F         Elton Kulla         M         Member         PS         No. 304 dated 26.04.2021           147         Berat         66         Krenar Suku         M         Kozeta Nushi         F         Kryetar         PS         No. 324 dated 27.04.2021           148         Durrës         23         Gerald Zotaj         M         Agron Prekperaj         M         Member         PSD         No. 324 dated 27.04.2021           149         Tiranë         34         Gerald Zotaj         M         Api Dyrreichi         M <t< td=""><td>141</td><td>Lezhë</td><td>15</td><td>Alma Nikolli</td><td>F</td><td>Dritan Preci</td><td>М</td><td>Member</td><td>PS</td><td></td></t<>	141	Lezhë	15	Alma Nikolli	F	Dritan Preci	М	Member	PS	
143         Lezne         15         Ardjan Rect         M         Enkelejda Rect         F         Member         PD         25.04.2021           144         Fier         56         Bledar Ndoni         M         Dorjan Spaho         M         Kryetar         PS         No. 302 dated 26.04.2021           145         Fier         59         Kledjus Ahmeti         M         Arjan Dosti         M         Member         PS         No. 303 dated 26.04.2021           146         Berat         65         Kozeta Nushi         F         Elton Kulla         M         Member         PS         No. 304 dated 26.04.2021           147         Berat         66         Krenar Suku         M         Kozeta Nushi         F         Kryetar         PS         No. 304 dated 26.04.2021           148         Durrës         23         Gentjan Spiro         M         Cezar Beja         M         Kryetar         PD         No. 323 dated 27.04.2021           149         Tiranë         34         Gerald Zotaj         M         Api Dyrreichi         M         Member         PSD         No. 327 dated	142	Lezhë	13	Mark Lleshi	М	Florian Sulaj	М	Kryetar	PD	
144         Fier         56         Biedar Ndofff         M         Dorjan Spano         M         Kryetar         PS         26.04.2021           145         Fier         59         Kledjus Ahmeti         M         Arjan Dosti         M         Member         PS         No. 303 dated 26.04.2021           146         Berat         65         Kozeta Nushi         F         Elton Kulla         M         Member         PS         No. 304 dated 26.04.2021           147         Berat         66         Krenar Suku         M         Kozeta Nushi         F         Kryetar         PS         No. 304 dated 26.04.2021           148         Durrës         23         Gentjan Spiro         M         Cezar Beja         M         Kryetar         PD         No. 323 dated 27.04.2021           149         Tiranë         34         Gerald Zotaj         M         Agron Prekperaj         M         Member         PSD         No. 324 dated 27.04.2021           150         Durrës         23         Shpotim Ciku         M         Api Durrishi         M         Kryetar         PS         No. 327 dated	143	Lezhë	15	Ardjan Reci	М	Enkelejda Reci	F	Member	PD	
145         Fier         59         Kledjus Anmeti         M         Arjan Dosti         M         Member         PS         26.04.2021           146         Berat         65         Kozeta Nushi         F         Elton Kulla         M         Member         PS         No. 304 dated 26.04.2021           147         Berat         66         Krenar Suku         M         Kozeta Nushi         F         Kryetar         PS         No. 304 dated 26.04.2021           148         Durrës         23         Gentjan Spiro         M         Cezar Beja         M         Kryetar         PD         No. 323 dated 27.04.2021           149         Tiranë         34         Gerald Zotaj         M         Agron Prekperaj         M         Member         PSD         No. 324 dated 27.04.2021           150         Durrës         23         Shpotim Ciku         M         Api Durrishi         M         Kryetar         PS         No. 327 dated	144	Fier	56	Bledar Ndoni	М	Dorjan Spaho	М	Kryetar	PS	
146         Berat         65         Kozeta Nushi         F         Elton Kulla         M         Member         PS         No. 304 dated 26.04.2021           147         Berat         66         Krenar Suku         M         Kozeta Nushi         F         Kryetar         PS         No. 304 dated 26.04.2021           148         Durrës         23         Gentjan Spiro         M         Cezar Beja         M         Kryetar         PD         No. 323 dated 27.04.2021           149         Tiranë         34         Gerald Zotaj         M         Agron Prekperaj         M         Member         PSD         No. 324 dated 27.04.2021           150         Durrës         23         Shpotim Ciku         M         Api Durrishi         M         Kryetar         PS         No. 327 dated	145	Fier	59	Kledjus Ahmeti	М	Arjan Dosti	М	Member	PS	
147         Berat         66         Krenar Suku         M         Kozeta Nushi         F         Kryetar         PS         No. 304 dated 26.04.2021           148         Durrës         23         Gentjan Spiro         M         Cezar Beja         M         Kryetar         PD         No. 323 dated 27.04.2021           149         Tiranë         34         Gerald Zotaj         M         Agron Prekperaj         M         Member         PSD         No. 324 dated 27.04.2021           150         Durrës         23         Shpotim Ciku         M         Api Dyrrighi         M         Kryetar         PS         No. 327 dated	146	Berat	65	Kozeta Nushi	F	Elton Kulla	М	Member	PS	No. 304 dated
148 Durrës 23 Gentjan Spiro M Cezar Beja M Kryetar PD No. 323 dated 27.04.2021  149 Tiranë 34 Gerald Zotaj M Agron Prekperaj M Member PSD No. 324 dated 27.04.2021  150 Durrës 23 Shootim Ciku M Api Dyrmichi M Kryetar PS No. 327 dated	147	Berat	66	Krenar Suku	М	Kozeta Nushi	F	Kryetar	PS	No. 304 dated
149 Tiranë 34 Gerald Zotaj M Agron Prekperaj M Member PSD No. 324 dated 27.04.2021	148	Durrës	23	Gentjan Spiro	М	Cezar Beja	М	Kryetar	PD	No. 323 dated
150 Durrisc 22 Shootim Ciku M Ani Dyrmichi M Kryotay DS No. 327 dated	149	Tiranë	34	Gerald Zotaj	М	Agron Prekperaj	М	Member	PSD	No. 324 dated
	150	Durrës	22	Shpetim Ciku	М	Ani Dyrmishi	М	Kryetar	PS	

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### INCOMES AND EXPENDITURES ACCORDING TO THE SELF-DECLARATIONS OF ELECTORAL SUBJECTS.

The table presents in detail the incomes and expenditures for electoral subjects (political parties and independent candidates) based on the self-declaration report submitted by each entity to the Central Election Commission.

After the name of the subject, the first group column presents details of incomes specifying the relevant source, specifically if these incomes come from: Public funding, Non-public funding, Non-public funding in kind, Membership fees, Incomes generated by the subject and incomes of candidates.

The second group column presents the total income, total expenses, the difference between them, as well as the unpaid amounts if the subject has such. Difference: When the difference is a negative number it indicates that the amount spent is greater than the income, while when the difference is a positive number the amount spent is lower than the income. The third group-column presents the detail of expenditures, according to the items declared in the self-declaration report by each subject, specifically expenditures for: Media, Social Media, Activities, Election Office, Transport, Administrative Expenses, Promotional Materials, Consultancy, Other Expenses, Indirect Expenses (which are in-kind donations to the subject) and the expenses of the candidates of that subject.

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		INCOMES  Non-public Water Company							BALA	NCE	
No.	Electoral Subject	Public funding	Nonpublic funding	Non-public financing in kind	Membership quotas	Subject itself	lts candidates	Total income	Total expenses	Difference	
1	The Legality Movement Party	0	0	0	0	0	0	0	0	0	
2	Justice, Integration and Unity Party	5,552,885	0	40,000	0	0	275,940	5,868,825	16,392,016	-10,523,191	
3	Christian Democratic Party of Albania	1,479,742	0	0	0	0	0	1,479,742	1,479,742	0	
4	National Democratic Front Party - (Balli Kombëtar Demokrat)	0	0	0	0	0	0	0	0	0	
5	Environmentalist Agrarian Party	0	0	0	0	0	1,098,180	1,098,180	1,085,407	12,773	
6	Albanian Democratic Union Party	0	0	0	0	0	0	0	0	0	
7	Christian Democratic Party	0	0	0	0	0	0	0	0	0	
8	Democratic Party	33,318,149	0	1,481,320	10,258,792	463,773	2,103,625	47,625,658	47,625,658	0	
9	Albanian Republican Party	3,926,232	0	0	0	0	309,208	4,235,440	4,217,058	18,382	
10	Human Rights Union Party	0	150,000	0	0	0	0	150,000	145,000	5,000	
11	Liberal Democrat Union Party	0	0	0	0	0	0	0	0	0	
12	New Democratic Spirit Party	2,188,832	0	66,000	0	0	0	2,254,832	1,703,500	551,332	
13	Time of Albania Party	0	0	0	0	0	0	0	0	0	
14	National Conservative Party Albania	0	0	0	0	0	0	0	0	0	
15	People's Union of Albanian Pensioners Party	0	0	0	0	0	0	0	0	0	
16	Albanian Emigration Party	0	0	0	0	0	0	0	0	0	
17	Movement for Change Party	0	748,720	151,096	0	0	0	899,816	807,386	92,430	
18	Albanian Democratic Movement Party	0	0	0	0	0	0	0	0	0	
19	Democratic Obedience Party	1,485,550	800,000	0	0	0	0	2,285,550	2,780,463	-494,913	
20	Social Democratic Party	1,629,360	0	0	0	0	0	1,629,360	0	1,629,360	
21	Socialist Party of Albania	55,826,750	1,000,000	4,101,904	25,839,161	51,141,673	38,328,598	176,238,086	172,046,612	4,191,474	
22	New Democracy Alliance Party	0	0	0	0	0	0	0	0	0	
23	National Front Party	0	118,011	0	0	0	0	118,011	108,811	9,200	
24	New Movement Party	0	0	0	0	0	431,342	431,342	431,342	0	
25	Socialist Movement for Integration	18,975,182	50,000	1,173,130	1,824,760	13,932,286	7,546,214	43,501,573	43,501,573	0	
26	Nisma Thurje Party	0	0	400,000	0	0	100,000	500,000	500,000	0	
27	National Development Movement	1,434,012	0	0	0	0	0	1,434,012	1,378,845	55,167	
28	Boiken Abazi	0	271,850	243,500	0	0	0	515,350	384,880	130,470	
29	Kreshnik Merxhani	0	234,950	0	0	0	0	234,950	234,902	48	
30	Iljaz Shehu	0	210,150	132,000	0	0	0	342,150	342,150	0	
31	Pal Shkambi	0	102,250	0	0	0	0	102,250	265,000	-162,750	
32	Elton Debreshi	0	439,047	73,000	0	0	0	512,047	498,006	14,041	
	Total	125,816,694	4,124,978	7,861,950	37,922,713	65,537,732	50,193,107	291,457,174	295,928,351	-4,471,177	

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

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	EXPENSES  Hide Madia Social Madia Activities Electoral Transport Administrative Promotional Consultancy Other Indirect Of the													
Unpaid duties	Media	Social Media	Activities	Electoral Offices	Transport	Administrative	Promotional Materials	Consultancy	Other	Indirect expenses	Of the candidates			
	0	0	0	0	0	0	0	0	0	0	0			
112,648	4,255,408	1,200,000	484,648	1,624,248	896,000	1,081,500	6,632,522	0	0		217,690			
	0	0	0	0	800,000	679,742	0	0	0	0	0			
	0	0	0	0	0	0	0	0	0	0				
											1,085,407			
	0	0	0	0	0	0	0		0					
	0	0	0	0	0	0	0		0					
90,000	20,564,623	6,715,528	147,732	90,000	438,000	214,830	7,260,000	8,610,000		1,481,320	2,103,625			
	2,555,000	0	0	0	592,000	60,350	700,500	0	0	0	309,208			
	0	73,000	0	0	0	0	72,000	0	0	0	0			
	0	0	0	0	0	0	0	0	0					
	130,507	118,500	0	0	486,000	344,202	505,399		52,892	66,000	0			
	0	0	0	0	0	0	0	0	0	0				
	0	0	0	0	0	0	0	0	0	0				
	0	0	0	0	0	0	0	0	0	0				
	0	0	0	0	0	0	0	0	0	0				
	607,570	116,096	0	35,000	0	0	48,720	0	0		0			
	0	0	0	0	0	0	0		0					
522,113	2,007,963	772,500	0	0	0	0	0	0	0	0	0			
	0	0	0	0	0	0	0	0	0	0	0			
	46,267,686	10,781,855	40,246,286	4,216,200	3,142,323	6,072,039	6,862,061	15,502,500	689,897	4,101,904	34,163,861			
	0	0	0	0	0	0	0	0	0	0				
	0	38,000	0	0	70,811	0	0	0		0				
	0	0	0	0	0	0	0	0	0	0	431,342			
	0	0	3,267,891	691,140	360,000	15,699,176	14,764,022	0	0	1,173,130	7,546,214			
		400,000	0	0	0	0	0	0	0	0	100,000			
150,000	0	0	0		321,000	907,845	0	150,000	0	0	0			
	0	0	0	0	43,500	15,800	325,580	0	0					
	0	0	0	0	21,770	3,100	62,432	0	147,600	0				
	0	0	0	149,750	0	978	59,422	0	0	132,000				
	115,000	0	0	0	30,000	0	120,000		0					
	0	0	13,590	0	173,846	72,970	164,600	0	0	73,000				
	76,503,757	20,215,479	44,160,147	6,806,338	7,375,250	25,152,532	37,577,258	24,262,500	890,389	7,027,354	45,957,347			

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### NCOME AND EXPENDITURE OF CANDIDATE

The table details income and expenses for candidates nominated by political parties or electoral coalitions. This appendix includes only the candidates, who in the self-declaration report have declared financial activity, ie have had income and have incurred expenses in function of the election campaign. In the first group column, the names of the candidates are presented according to the electoral subjects under whose logo they are running, the District (Electoral Zone) where they ran, as well as the number of electoral offices declared by each of them. The revenue detail is then presented specifying: the amount of revenue the candidate has self-funded for his / her campaign, the amount of revenue donated

					INCOMES		В	ALANCE			
No.	Electoral Subject	Candidate	County	No. of election offices opened	Donation to oneself	Donation from others	Donation in nature	Total income	Total expenses	Difference	Media
1	SP	Nasip Naço	Berat	3	100,000		65,000	165,000	165,000	0	
2	SP	Lindita Nikolla	Lezhë	2	38,000	95,640	160,000	293,640	293,640	0	
3	SP	Teuta Ramaj	Vlorë	2		98,000	45,000	143,000	143,000	0	
4	SP	Vullnet Sinaj	Vlorë	2	657,560	2,250,000		2,907,560	2,907,560	0	362,920
5	SP	Alda Mema	Shkodër	1	882,038			882,038	882,038	0	
6	SP	Bledar Çuçi	Gjirokastër	1	95,000	2,113,635		2,208,635	2,203,010	5,625	
7	SP	Blerina Gjylameti	Korçë	1		800,000		800,000	791,608	8,392	
8	SP	Dionis Imeraj	Dibër	1			374,400	374,400	374,400	0	
9	SP	Ervis Moçka	Vlorë	1	100,000		10,000	110,000	106,000	4,000	
10	SP	Evis Kushi	Elbasan	1	500,000			500,000	165,877	334,123	
11	SP	Fatmir Xhafaj	Tiranë	1	1,000,000			1,000,000	703,600	296,400	
12	SP	Gerta Duraku	Kukës	1	1,000,000			1,000,000	999,699	301	
13	SP	Ilir Metaj	Vlorë	1	20,000		20,000	40,000	40,000	0	
14	SP	Kledina Skendo	Tiranë	1	151,471		50,000	201,471	201,471	0	
15	SP	Lefter Koka	Durrës	1	195,400			195,400	195,400	0	
16	SP	Lela Berdica	Shkodër	1	400,000			400,000	328,000	72,000	
17	SP	Leonard Beqiri	Vlorë	1	25,534		29,438	54,972	54,972	0	
18	SP	Petrit Malaj	Kukës	1				521,016	521,016	0	
19	SP	Pranvera Resulaj	Vlorë	1	518,063		19,446	537,509	446,250	91,259	
20	SP	Alban Xhelili	Durrës		164,286			164,286	164,286	0	
21	SP	Alfred Muharemi	Tiranë		247,889			247,889	247,889	0	
22	SP	Alqi Bllako	Tiranë			1,011,950		1,011,950	864,680	147,270	
23	SP	Anila Denaj	Vlorë		285,202	949,875		1,235,077	1,235,077	0	
24	SP	Antoneta Dhima	Fier		422,831			422,831	422,831	0	
25	SP	Arben Pellumbi	Tiranë		996,040	80,000		1,076,040	1,076,040	0	
26	SP	Arber Arapi	Fier		81,000			81,000	81,000	0	
27	SP	Arian Jaupllari	Korçë			249,500		249,500	249,500	0	
28	SP	Baftjar Zeqaj	Fier			500,000		500,000	494,600	5,400	
29	SP	Bardhyl Kollçaku	Berat		250,008	450,000		700,008	700,008	0	
30	SP	Belinda Balluku	Tiranë			2,950,000	23,500	2,973,500	831,720	2,141,780	
31	SP	Benet Beci	Shkodër		61,735	300,000		361,735	361,735	0	
32	SP	Bledi Como	Korçë		140,591			140,591	140,591	0	25,000
33	SP	Bora Muzhaqi	Tiranë		122,900	250,000		372,900	372,900	0	
34	SP	Briseida Gjoza	Elbasan			159,800		159,800	102,103	57,697	
35	SP	Dallendyshe Bici	Tiranë			1,334,750	20,000	1,354,750	1,332,119	22,631	
36	SP	Damian Gjiknuri	Vlorë		278,000			278,000	278,809	-809	200,000

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by third parties in cash, and the amount of revenue donated by third parties in nature. The second group column presents the total income, total expenses and the difference between them. When the difference is a negative number it indicates that the amount spent is greater than the revenue, while when the difference is a positive number the amount spent is lower than the revenue. The third group column presents the details of the expenses, according to the items declared in the self-declaration report of each candidate, namely: Media, Social Media, Promotional Materials, Advertising, Rallies, Administrative Expenses, Electoral Offices, Transport, Publishing, Polls, Indirect Expenses, as well as ""Unspecified"". It is noted that the item ""Not detailed"" has been added as a column (by KRIIK) to reconcile the revenue / expenditure approach in the table. Relevant explanations on the amounts reflected in this column are given in the ""Comments"" column. "

	EXPENSES  Cocial Medic Promotional Infrastrument Public Administrative Floatened Offices Transport Bublishing Balls Indianat Others										
Social Media	Promotional Materials	Advertisement	Rallies	Administrative Expenses	Electoral Offices	Transport	Publishing	Polis	Indirect	Other	Comments
100,000	matorialo			- Inpoliced	35,000	30,000					
,	283,640				10,000	,					
	98,000				45,000						
	475,370		258,500	10,372	416,113	1,384,285					
		25,800	180,000	8,300	50,000	617,938					
292,850			600,000		1,310,160						
			507,708	218,000	60,000			5,900			
	195,400				92,000	87,000					
	96,000				10,000						
			2,450	118,830	15,000	29,597					
	138,600			40,000	525,000						
				240,350	34,099	725,250					
					40,000						
39,200					50,000	112,271					
75,400					120,000						
50,000			200,000		18,000	60,000					The amount of expenses stated in the report is 396,660 ALL, but their specification is illegible.
25,534	24,000				5,438						
9,240	324,200		38,500		36,810	112,266					The specification of donations in the report is illegible.
18,062	79,400		82,000	97,482	119,306		50,000				Electoral office in-kind donation, indirect expenditure
164,286					0						
247,889					0						
521,000	343,680				0						
	1,030,775			50	0	204,252					
	170,835			251,996	0						
739,800	336,240				0						
	59,000				0	22,000					
49,500	35,000			49,408	0	115,592					
	494,600				0						
					0					700,008	The report lacks a table of expenditures.
	307,200		500,000	1,020	0				23,500		
150,000	120,000		49,830	41,905	0						
	14,000				0	101,591					Report compiled in hand writing. Makes it difficult to read and understand.
165,082	205,000			2,818	0						
27,103			75,000		0						
620,090	146,029				0	546,000			20,000		
78,809					0						

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No.   Charles   Charles					II	NCOME	S	BALANCE			
18   SP	No.		Candidate	County				Total income	Total expenses	Difference	Media
SP	37	SP	Desantila Tahiraj	Elbasan		192,200	84,000	276,200	276,200	0	
SP	38	SP	Dhora Shkembi	Korçë	156,300			156,300	156,300	0	
1	39	SP	Edmond Rushi	Tiranë	158,000			158,000	158,000	0	
P	40	SP	Edona Bilali	Shkodër				170,000	170,000	0	
SP	41	SP	Eduard Ndreca	Lezhë	345,100			345,100	345,100	0	
Ad   SP	42	SP	Eduart Shalsi	Tiranë	175,000	272,750		447,750	445,000	2,750	
Fig.   Finds   Fig.   Entist   Fig.   Elbasan   379,000   379,000   0   0   0   0   0   0   0   0   0	43	SP	Elisa Spiropali	Tiranë		433,500	120,000	553,500	553,000	500	
A	44	SP	Eljo Hysko	Tiranë			195,200	195,200	195,200	0	
47   SP	45	SP	Endri Pepa	Elbasan	379,000			379,000	379,000	0	
48   SP	46	SP	Enslemvera Zake	Korçë	136,489			136,489	136,489	0	
SP	47	SP	Enver Roshi	Elbasan			225,960	225,960	225,960	0	
Section   February   February	48	SP	Erion Brace	Fier	201,560			201,560	201,560	0	
SP	49	SP	Ermonela Felaj	Tiranë	210,000			210,000	210,000	0	
SZ   SP	50	SP	Ervin Bushati	Tiranë	21,600	72,000		93,600	93,600	0	
Sample	_			Tiranë	226,800			226,800	226,800		
SP	52	SP	Etjen Xhafaj	Tiranë	234,825	388,500		623,325	622,195	1,130	123,110
SP   Gramoz Ruçi   Fier	53	SP	Fadil Nasufi	Berat	285,568		50,000	335,568	335,568	0	
Fig.	54	SP	Florenc Spaho	Elbasan	98,553			98,553	98,553	0	
SP	55	SP	Gramoz Ruçi	Fier	492,000			492,000	492,000	0	
SP	56	SP	Halim Dauti	Kukës	267,917			267,917	267,917	0	
59         SP         Ilir Ndraxhi         Durrës         260,790         260,790         260,790         0           60         SP         Ilirian Pendavinji         Korçë         200,000         200,000         199,400         600           61         SP         Jona Leqezja         Shkodër         600,000         600,000         503,596         96,404           62         SP         Kabir Fishta         Shkodër         50,000         200,000         110,000         90,000           63         SP         Klodida Dibra         Tiranë         100,000         100,000         86,986         130,114           65         SP         Klodida Bushka         Tiranë         113,000         113,000         130,000         0           66         SP         Kristaq Skenderi         Elbasan         55,350         55,350         55,350         0           67         SP         Laert Duraj         Gjirokastër         137,865         137,865         137,865         0           68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0         390,000         0           69         SP         Marsida Hyseni         Elbasan	57	SP	Hatixhe Konomi	Berat	50,000	251,500		301,500	301,500	0	
60         SP         Illirian Pendavinji         Korçë         200,000         200,000         199,400         600           61         SP         Jona Leqezja         Shkodër         600,000         600,000         503,596         96,404           62         SP         Kabir Fishta         Shkodër         50,000         50,000         0         50,000           63         SP         Klevis Xhoxhi         Elbasan         200,000         110,000         90,000           64         SP         Klodida Dibra         Tiranë         100,000         110,000         86,986         13,014           65         SP         Klotlida Bushka         Tiranë         113,000         113,000         113,000         0           66         SP         Klotlida Bushka         Tiranë         113,000         113,000         113,000         0           67         SP         Laert Duraj         Gjirokastër         137,865         137,865         137,865         0           68         SP         Lavim Krashi         Dibër         490,000         490,000         490,000         390,000           69         SP         Miria Kumbaro         Gjirokastër         490,750         375,000	58	SP	Ilir Beqaj	Shkodër	500,000			500,000	285,550	214,450	
61         SP         Jona Legezja         Shkodër         600,000         600,000         503,596         96,404           62         SP         Kabir Fishta         Shkodër         50,000         50,000         0         50,000           63         SP         Klevis Xhoxhi         Elbasan         200,000         110,000         90,000           64         SP         Klodeta Dibra         Tiranë         110,000         113,000         113,000         0           66         SP         Kloitida Bushka         Tiranë         113,000         113,000         130,000         0           66         SP         Kristaq Skenderi         Elbasan         55,350         55,350         0         0           67         SP         Laert Duraj         Gjirokastër         137,865         137,865         137,865         0         68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0         390,000         0         390,000         0         390,000         0         390,000         0         390,000         0         0         0         390,000         0         0         0         390,000         0         0         390,000 <td>59</td> <td>SP</td> <td>Ilir Ndraxhi</td> <td>Durrës</td> <td>260,790</td> <td></td> <td></td> <td>260,790</td> <td>260,790</td> <td>0</td> <td></td>	59	SP	Ilir Ndraxhi	Durrës	260,790			260,790	260,790	0	
62         SP         Kabir Fishta         Shkoder         50,000         50,000         0         50,000           63         SP         Klevis Xhoxhi         Elbasan         200,000         110,000         90,000           64         SP         Klodeta Dibra         Tiranë         100,000         100,000         86,986         13,014           65         SP         Klotlida Bushka         Tiranë         113,000         113,000         113,000         0           66         SP         Kiristag Skenderi         Elbasan         55,350         55,350         0           67         SP         Laert Duraj         Gjirokastër         137,865         137,865         137,865         0           68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0         390,000           69         SP         Marsida Hyseni         Elbasan         80,000         80,000         80,000         0         390,000         0           70         SP         Milva Ekonomi         Durrës         375,000         375,000         309,835         65,165         11         15         94,9750         366,236         43,514         43,514	60	SP	Ilirian Pendavinji	Korçë		200,000		200,000	199,400	600	
SP   Klevis Xhoxhi   Elbasan   200,000   200,000   110,000   90,000	61	SP	Jona Leqezja	Shkodër		600,000		600,000	503,596	96,404	
64         SP         Klodeta Dibra         Tiranë         100,000         86,986         13,014           65         SP         Klotilda Bushka         Tiranë         113,000         113,000         0           66         SP         Kristaq Skenderi         Elbasan         55,350         55,350         55,350         0           67         SP         Laert Duraj         Gjirokastër         137,865         137,865         137,865         0           68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0         390,000           69         SP         Marsida Hyseni         Elbasan         80,000         80,000         80,000         0         0           70         SP         Milva Ekonomi         Durrës         375,000         375,000         398,335         65,165           71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050	62	SP	Kabir Fishta	Shkodër		50,000		50,000	0	50,000	
65         SP         Klotilda Bushka         Tiranë         113,000         113,000         0           66         SP         Kristaq Skenderi         Elbasan         55,350         55,350         55,350         0           67         SP         Laert Duraj         Gjirokastër         137,865         137,865         0           68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0           69         SP         Marsida Hyseni         Elbasan         80,000         80,000         80,000         0           70         SP         Milva Ekonomi         Durrës         375,000         375,000         309,835         65,165           71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirliu         Tiranë         173,140         173,140         173,140         173,140         0     <	63	SP	Klevis Xhoxhi	Elbasan	200,000			200,000	110,000	90,000	
66         SP         Kristaq Skenderi         Elbasan         55,350         55,350         0           67         SP         Laert Duraj         Gjirokastër         137,865         137,865         0           68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0           69         SP         Marsida Hyseni         Elbasan         80,000         80,000         80,000         0           70         SP         Milva Ekonomi         Durrës         375,000         375,000         309,835         65,165           71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirliu         Tiranë         173,140         173,140         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715	_	SP	Klodeta Dibra	Tiranë	100,000			100,000	86,986	13,014	
67         SP         Laert Duraj         Gjirokastër         137,865         137,865         0           68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0         390,000           69         SP         Marsida Hyseni         Elbasan         80,000         80,000         80,000         0           70         SP         Milva Ekonomi         Durrës         375,000         375,000         309,835         65,165           71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastiriu         Tiranë         173,140         173,140         173,140         173,140         191,715         191,715         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër		SP	Klotilda Bushka	Tiranë	113,000			113,000	113,000	0	
68         SP         Lavdim Krashi         Dibër         490,000         490,000         490,000         0         390,000           69         SP         Marsida Hyseni         Elbasan         80,000         80,000         80,000         0           70         SP         Milva Ekonomi         Durrës         375,000         375,000         309,835         65,165           71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirilu         Tiranë         173,140         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         500,000 <t< td=""><td>66</td><td>SP</td><td>Kristaq Skenderi</td><td>Elbasan</td><td>55,350</td><td></td><td></td><td>55,350</td><td>55,350</td><td>0</td><td></td></t<>	66	SP	Kristaq Skenderi	Elbasan	55,350			55,350	55,350	0	
69         SP         Marsida Hyseni         Elbasan         80,000         80,000         80,000         0           70         SP         Milva Ekonomi         Durrës         375,000         375,000         309,835         65,165           71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirilu         Tiranë         173,140         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Pahman Rraja         Durrës         150,000         150,000         145,000 <t< td=""><td>67</td><td>SP</td><td>Laert Duraj</td><td>Gjirokastër</td><td>137,865</td><td></td><td></td><td>137,865</td><td>137,865</td><td>0</td><td></td></t<>	67	SP	Laert Duraj	Gjirokastër	137,865			137,865	137,865	0	
70         SP         Milva Ekonomi         Durrës         375,000         375,000         309,835         65,165           71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirilu         Tiranë         173,140         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Pahrent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         28,987		_	Lavdim Krashi	Dibër	490,000			490,000			390,000
71         SP         Mirela Kumbaro         Gjirokastër         409,750         409,750         366,236         43,514           72         SP         Niko Kurri         Vlorë         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirliu         Tiranë         173,140         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187	_			Elbasan							
72         SP         Niko Kurri         Vlorë         103,050         103,050         0           73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirliu         Tiranë         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0	_	SP	Milva Ekonomi	Durrës		375,000		375,000	309,835	65,165	
73         SP         Niko Peleshi         Korçë         300,050         300,050         300,050         0           74         SP         Ogerta Manastirliu         Tiranë         173,140         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0			Mirela Kumbaro	Gjirokastër		409,750		409,750	366,236	43,514	
74         SP         Ogerta Manastirliu         Tiranë         173,140         173,140         173,140         0           75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0	_		Niko Kurri	Vlorë	103,050					0	
75         SP         Ornaldo Rakipi         Tiranë         191,715         191,715         191,715         0           76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0		SP	Niko Peleshi	Korçë		300,050		300,050	300,050	0	
76         SP         Pal Peraj         Shkodër         42,460         42,460         42,460         0           77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0				Tiranë				173,140		0	
77         SP         Pandeli Majko         Tiranë         270,080         270,080         270,080         0           78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0	_		Ornaldo Rakipi	Tiranë					191,715	0	
78         SP         Plarent Ndreca         Tiranë         500,000         500,000         340,000         160,000           79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0		SP	Pal Peraj	Shkodër				-	42,460		
79         SP         Rahman Rraja         Durrës         150,000         150,000         145,000         5,000           80         SP         Taulant Balla         Elbasan         996,200         28,987         1,025,187         1,025,187         0			Pandeli Majko	Tiranë	270,080			270,080	270,080	0	
80 SP Taulant Balla Elbasan 996,200 28,987 1,025,187 0	78	SP	Plarent Ndreca	Tiranë	500,000			500,000	340,000	160,000	
	_	SP	Rahman Rraja	Durrës		150,000		150,000	145,000	5,000	
81         SP         Toni Gogu         Tiranë         569,228         569,228         569,228         0			Taulant Balla	Elbasan	996,200		28,987	1,025,187	1,025,187	0	
	81	SP	Toni Gogu	Tiranë			569,228	569,228	569,228	0	

SEPTEMBER 2020 – JANUARY 2022

**OBSERVATION** 

		EX	PENS	ES							
Social Media	Promotional Materials	Advertisement	Rallies	Administrative Expenses	Electoral Offices	Transport	Publishing	Polis	Indirect	Other	Comments
-	matorialo		192,200	Enponoco	0	84,000					
31,600			,		0	124,700					
	4,000				0	154,000					
	,,,,,		345,100		0					170,000	The report contains of the amount of income expenses, and no deta the relevant items
	445,000		345,100		0						
	433,000				0				120,000		
195,200	433,000				0				120,000		
130,200	90,000		190,000		0	99,000					
15,919	120,570		150,000		0	33,000					
10,515	120,010				0	225,960					
					0	201,560					
					0	201,000	210,000				The report contains or specification of income, that of expenses, pres only their total amore
				21,600	0		72,000				
	226,800				0						
333,125				42,850	0	123,110					
37,500	200,000		42,000		0	6,068			50,000		The candidate has pre only on the first pag- indirect expenditure of ALL, but does not hav relevant page of in- donations in the rep
18,553				50,000	0	30,000					
492,000					0						
					0	267,917					
					0					301,500	
279,319				6,231	0						
	150,000			110,790	0						
	134,400				0	65,000					
15,636	94,560			164,800	0				228,600		The report contains or first page where the am income is declared. The other data.
			50,000		0	60,000					
50,199	16,387				0		20,400				
	68,000			45,000	0						
	55,350				0						
10,213	100,000				0	127,652					
			80,000		0						
	129,030		45,596		0	135,209					
	4,000			188,631	0	173,605					
	103,050				0						
	217,050			83,000	0						
23,140	150,000				0						
				191,715	0						
	35,200			7,260	0						
	100,080			170,000	0						
	340,000				0						
					0	145,000					
28,987				645,000	0	258,000	93,200				

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

					11	NCOME	S	В	ALANCE		
No.	Electoral Subject	Candidate	County	No. of election offices opened	Donation to oneself	Donation from others	Donation in nature	Total income	Total expenses	Difference	Media
82	SP	Ulsi Manja	Tiranë		200,240			200,240	200,240	0	1
83	SP	Xhemal Qefalija	Tiranë		245,372			245,372	245,372	0	
84	SP	Ylli Shehu	Tiranë			1,475,000		1,475,000	825,060	649,940	
85	PR	Fatmir Mediu	Tiranë		309,208			309,208	309,208	0	
86	DP	Anduena Qefalia	Tiranë		211,090	125,000	33,725	369,815	267,635	102,180	130,465
87	DP	Edmond Spaho	Korçë			500,000	76,500	576,500	195,500	381,000	
88	DP	Entela Shehaj	Gjirokastër		72,600			72,600	72,600	0	
89	DP	Ethem Aga	Tiranë		17,770	35,600		53,370	53,370	0	
90	DP	Myzafer Elezi	Gjirokastër		253,000			253,000	253,000	0	
91	DP	Zef Hila	Shkodër				150,000	150,000	150,000	0	
92	SMI	Endrit Braimllari	Korçë	5	96,612		33,177	129,789	129,789	0	
93	SMI	Agron Cela	Shkodër	2	430,000		35,872	465,872	465,872	0	
94	SMI	Hajri Laci	Dibër	2	103,571		7.710	103,571	103,571	0	
95	SMI	Altin Toska	Elbasan	1			7,718	7,718	7,716	2	
96	SMI	Ardian Alushi	Fier	1	450.074		12,600	12,600	12,600	0	
97	SMI	Bahri Shaqiri Blerina Bulku	Durrës Durrës	1	159,974		21,060	159,974 21,060	159,974 21,060	0	
99	SMI	Bujar Dhima	Durrës	1			31,184	31,184	31,184	0	
100	SMI	Danjela Tema	Durrës	1			9,180	9,180	9,180	0	
101	SMI	Diken Bushaj	Vlorë	1	52,600		35,297	87,897	87,896	1	
102	SMI	Durim Hoçja	Durrës	1	15,000		4,365	19,365	19,365	0	
103	SMI	Edmond Ndou	Shkodër	1	290,000		10,615	300,615	300,650	-35	
104	SMI	Enon Karapici	Durrës	1	49,434		10,010	49,434	49,434	0	
105	SMI	Entela Shkurtaj	Vlorë	1	6,500		10,000	16,500	16,500	0	
106	SMI	Grisejda Myslimi	Vlorë	1	116,100		167,400	283,500	283,500	0	
107	SMI	Kejdi Mehmetaj	Fier	1	69,144	363,000	101,100	432,144	432,144	0	243,000
108	SMI	Kontjana Kunci	Durrës	1	,		52,061	52,061	52,060	1	
109	SMI	Lindita Reçi	Shkodër	1	260,000		7,000	267,000	267,000	0	
110	SMI	Liri Dema	Vlorë	1	81,121		27,659	108,780	108,780	0	
111	SMI	Luan Rama	Tiranë	1	144,200		20,970	165,170	165,170	0	
112	SMI	Monika Kryemadhi	Tiranë - Fier - Elbasan	1	460,807	100,000		560,807	560,807	0	
113	SMI	Shemsi Prençi	Durrës	1	97,338			97,338	97,338	0	
114	SMI	Silva Caka	Tiranë	1	15,000		37,140	52,140	52,140	0	
115	SMI	Aldi Fusha	Tiranë		7,756		240,240	247,996	247,996	0	
116	SMI	Altin Koltraka	Dibër				1,107	1,107	1,107	0	
117	SMI	Anxhela Shenaj	Vlorë		61,000		33,240	94,240	94,240	0	
118	SMI	Arben Cuco	Fier		30,000		12,732	42,732	12,732	30,000	
119	SMI	Arben Rroko	Tiranë		96,200			96,200	96,200	0	10,000
120	SMI	Ardit Cela	Vlorë		79,409			79,409	70,409	9,000	
121	SMI	Artur Baku	Durrës				1,655	1,655	1,655	0	
122	SMI	Aurela Kalivaçi	Berat		125,683			125,683	125,683	0	
123	SMI	Besnik Jakaj	Tiranë		110,931			110,931	110,931	0	
124	SMI	Bledar Monaj	Berat		51,200		9,000	60,200	60,200	0	
125	SMI	Blendi Gurra	Dibër		,		5,141	5,141	5,141	0	
126	SMI	Blerdi Licaj	Tiranë				344,056	344,056	344,056	0	
127	SMI	Denis Hidri	Tiranë				7,755	7,755	7,755	0	
128	SMI	Edmond	Tiranë		136,820		7,733	136,820	136,820	0	
		Haxhinasto			,- ,		0.550	-			
129	SMI	Elona Gurri	Durrës				2,553	2,553	2,553	0	

## OBSERVATION REPORT

SEPTEMBER 2020 – JANUARY 2022

		EX	PENS	ES							
Social Media	Promotional Materials	Advertisement	Rallies	Administrative Expenses	Electoral Offices	Transport	Publishing	Polls	Indirect	Other	Comments
48,330	80,000			27,910	0	44,000					
46,872	198,500				0						
	357,060				0	468,000					7
309,208					0						The report does not contain the income section, but only the expenditure section.
33,725	80,145			1,700	0		21,600				The amount of income on the first page of the report (267,635 ALL) does not match the amount declared in the relevant incomes section (369,815 ALL).
	119,000				0				76,500		
					0	72,600					
36,200			050.000	1,120	0	16,050					
150,000			253,000		0						
6,612	90,000				33,177						
3,547	00,000	430,000			32,325						
	30,000	,			73,571						
2,723					4,993						
					12,600						
52,946	35,000		5,370		35,916	30,743					
					21,060						
					31,184						
	52,600				9,180 7,601	27,695					
	15,000				4,365	21,095					
	10,000	290,000			10,650						
2 670		200,000									
3,670					45,764						
	6,500				10,000						
47.004	203,600			4.700	30,000	49,900					
17,384 3,056	120,000			1,760	50,000 49,004						
3,030	260,000				7,000						
1,021	70,100				10,000	27,659					
,-	144,200				20,970	,					
370,807	100,000				90,000						
	70,000				27,338						
	15,000				37,140						
7,756	240,240				0						
1,107					0						
	61,000				0	33,240					
12,732					0						
	86,200				0						
	70,409				0						
1,655					0						
30,178	3,000				0	92,505					
85,431	25,500				0						
	51,200				0	9,000					
5,141	7// 056				0						
7,755	344,056				0						
94,400	42,420				0						
2,553					0						

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

No.         Elector Subje           130         SM           131         SM           132         SM           133         SM           134         SM           135         SM           136         SM           137         SM           138         SM           139         SM           140         SM           141         SM           142         SM           143         SM           144         SM	idect Ballina	a Tiranë o Tiranë hi Elbasan kha Berat irko Berat hu Vlorë a Tiranë joni Vlorë taj Tiranë la Korçë Shkodër i Vlorë	No. of election offices opened	4,922 1,526 63,144 12,000 25,473 47,000 123,120 32,800 213,338 109,650	Donation from others	Donation in nature	4,922 1,526 63,144 12,000 10,093 25,473 47,000 123,120	49,217 1,526 63,144 12,000 10,093 25,473 47,000 123,120	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Media
131 SM 132 SM 133 SM 134 SM 135 SM 136 SM 137 SM 137 SM 139 SM 140 SM 141 SM 142 SM 143 SM	Eriona Bixh Erisa Xhixh Exertion Ginis MI Esmeralda Q MI Everton She MI Faik Basha MI Ferdinant Alig MI Floida Kërpa MI Gentian Ca MI Ilir Hyseni MI Joana Rug MI Juar Myftar MI Juar Myftar MI Klajda Gjosl MI Klevi Pojan	a Tiranë o Tiranë hi Elbasan kha Berat irko Berat hu Vlorë a Tiranë joni Vlorë taj Tiranë la Korçë Shkodër i Vlorë		1,526 63,144 12,000 25,473 47,000 123,120 32,800 213,338		10,093	1,526 63,144 12,000 10,093 25,473 47,000	1,526 63,144 12,000 10,093 25,473 47,000	0 0 0 0 0 0	400.400
132 SM 133 SM 134 SM 135 SM 136 SM 137 SM 138 SM 139 SM 140 SM 141 SM 142 SM 143 SM	Erisa Xhixh  Ermir Gjinis  Esmerald Ho.  Esmeralda Q  Everton She  Everton She  Everton She  Everton She  Everton She  Everton She  III Faik Basha  Everton Alig  III Floida Kërpa  Everton Alig  Everton She  Everton She  III Faik Basha  Everton She  III Floida Kërpa  Everton She  Everton She	o Tiranë hi Elbasan kha Berat rko Berat hu Vlorë a Tiranë joni Vlorë Tiranë a Korçë Shkodër i Vlorë		63,144 12,000 25,473 47,000 123,120 32,800 213,338		10,093	63,144 12,000 10,093 25,473 47,000	63,144 12,000 10,093 25,473 47,000	0 0 0 0	400,400
133 SM 134 SM 135 SM 136 SM 137 SM 138 SM 139 SM 140 SM 141 SM 142 SM 143 SM	Ermir Gjinis  Esmerald Ho  Esmerald Q  Emil Everton She  Emil Ferdinant Alig  Emil Floida Kërpa  Emil Gentian Ca  Emil Joana Rug  Emil Juar Myftar  Emil Klajda Gjosi  Emil Klevi Pojan	hi Elbasan kha Berat rko Berat hu Vlorë a Tiranë joni Vlorë tiqi Tiranë la Korçë Shkodër i Vlorë		12,000 25,473 47,000 123,120 32,800 213,338		10,093	12,000 10,093 25,473 47,000	12,000 10,093 25,473 47,000	0 0 0 0	400,400
134 SM 135 SM 136 SM 137 SM 138 SM 139 SM 140 SM 141 SM 142 SM 143 SM 144 SM	Esmerald Ho.  Esmeralda Q.  Everton She  Eve	kha Berat rko Berat hu Vlorë a Tiranë joni Vlorë a Korçë Shkodër i Vlorë		25,473 47,000 123,120 32,800 213,338		10,093	10,093 25,473 47,000	10,093 25,473 47,000	0 0	400,400
135 SM 136 SM 137 SM 138 SM 139 SM 140 SM 141 SM 142 SM 143 SM 144 SM	Esmeralda Q Everton She Everto	rko Berat hu Vlorë a Tiranë joni Vlorë tiqi Tiranë la Korçë Shkodër i Vlorë		47,000 123,120 32,800 213,338		10,093	25,473 47,000	25,473 47,000	0	400,400
135 SM 136 SM 137 SM 138 SM 139 SM 140 SM 141 SM 142 SM 143 SM 144 SM	Esmeralda Q Everton She Everto	rko Berat hu Vlorë a Tiranë joni Vlorë tiqi Tiranë la Korçë Shkodër i Vlorë		47,000 123,120 32,800 213,338			25,473 47,000	25,473 47,000	0	400 400
136 SM 137 SM 138 SM 139 SM 140 SM 141 SM 142 SM 143 SM 144 SM	Everton She EMI Faik Basha EMI Ferdinant Alig EMI Floida Kërpa EMI Gentian Ca EMI Ilir Hyseni EMI Joana Ruç EMI Juar Myftar EMI Klajda Gjosl EMI Klevi Pojan	hu Vlorë a Tiranë joni Vlorë açi Tiranë la Korçë Shkodër i Vlorë		47,000 123,120 32,800 213,338			47,000	47,000	0	400 400
137 SM 138 SM 139 SM 140 SM 141 SM 142 SM 143 SM 144 SM	Faik Basha  Ferdinant Alig  Floida Kërpa  MI Gentian Ca  MI Ilir Hyseni  MI Joana Ruç  MI Juar Myftar  MI Klajda Gjosl  MI Klevi Pojan	a Tiranë joni Vlorë açi Tiranë la Korçë Shkodër i Vlorë		123,120 32,800 213,338						400 400
138 SM 139 SM 140 SM 141 SM 142 SM 143 SM 144 SM	Ferdinant Alig MI Floida Kërpa MI Gentian Ca MI Ilir Hyseni MI Joana Rug MI Juar Myftar MI Klajda Gjosl MI Klevi Pojan	joni Vlorë açi Tiranë la Korçë Shkodër i Vlorë		32,800 213,338			120,120	120,120		123,120
139 SM 140 SM 141 SM 142 SM 143 SM 144 SM	MI Floida Kërpa MI Gentian Ca MI Ilir Hyseni MI Joana Ruç MI Juar Myftar MI Klajda Gjosl MI Klevi Pojan	açi Tiranë la Korçë Shkodër i Vlorë		213,338			32,800	32,800	0	123,120
140 SM 141 SM 142 SM 143 SM 144 SM	MI Gentian Ca  MI Ilir Hyseni  MI Joana Ruç  MI Juar Myftar  MI Klajda Gjosl  MI Klevi Pojan	la Korçë Shkodër i Vlorë					213,338	213,338	0	60,000
141 SM 142 SM 143 SM 144 SM	MI Ilir Hyseni MI Joana Rug MI Juar Myftar MI Klajda Gjosl MI Klevi Pojan	Shkodër i Vlorë		103,030			109,650	109,650	0	00,000
142 SM 143 SM 144 SM	Joana Ruç MI Juar Myftar MI Klajda Gjosl MI Klevi Pojan	i Vlorë		230,000			230,000	230,000	0	
143 SM 144 SM	MI Juar Myftar MI Klajda Gjosl MI Klevi Pojan			61,000			61,000	61,000	0	
144 SM	MI Klajda Gjosl	uj   1101		25,745			25,745	25,745	0	
	MI Klevi Pojan	-							0	
	,			125,000		75 570	125,000	125,000		
				450,000		75,579	75,579	75,579	0	
146 SM				153,020		22.222	153,020	153,020	0	
147 SM				10,000		36,993	46,993	46,993	0	
148 SM		-		33,939			33,939	33,939	0	70.000
149 SM				85,000		0.000	85,000	85,000	0	70,000
150 SM				70.000		2,626	2,626	2,626	0	25 000
151 SM 152 SM				70,000			70,000	70,000	0	35,000
153 SM				25,676		1,737	25,676 1,737	25,676 1,737	0	
154 SM						33,372		33,372	0	
155 SM	<u> </u>			72,979		33,372	33,372 72,979	72,979	0	
156 SM	<u>'</u>			12,313		1,861	1,861	1,861	0	
157 SM				5,157		1,001	5,157	5,157	0	
158 SM		-		150,000			150,000	150,000	0	
159 SM				52,595			52,595	52,595	0	
160 SM				02,000		16,620	16,620	16,620	0	
161 SM						21,044	21,044	21,044	0	
162 SM				793,426		,-	793,426	793,426	0	
163 PAA	, ,			140,000	120,000	398,180	658,180	658,180	0	
164 PA				.,,	440,000	-,	440,000	427,227	12,773	
165 NTH				0	0	100,000	100,000	100,000	0	
166 LRE				15,000		· · ·	15,000	15,000	0	
167 LRE				74,200			74,200	74,200	0	74,200
168 LRE				74,100			74,100	74,100	0	,=50
169 LRE				15,000			15,000	15,000	0	
170 LRE				236,000			236,000	236,000	0	
171 LRE				17,042			17,042	17,042	0	
LINE	JUIIIU INAIII				20 527 000	# 220 acz				1 0/10 015
		Total		23,859,439	20,527,000	4,229,267	49,306,723	44,237,559	5,069,164	1,846,815

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 – JANUARY 2022

	EXPENSES  Social Media Promotional Advertisement Rallies Administrative Electoral Offices Transport Publishing Polls Indirect Other													
Social Media	Promotional Materials	Advertisement	Rallies	Administrative Expenses	Electoral Offices	Transport	Publishing	Polis	Indirect	Other	Comments			
49,217					0									
1,526					0									
63,144					0									
12,000					0									
					0	10,093								
25,473					0									
	47,000				0									
					0									
	32,800				0									
153,338					0									
20,000	75,000				0	14,650								
	230,000				0									
	61,000				0									
5,745	20,000				0									
90,000	35,000				0									
75,579					0									
				153,020	0									
36,993	10,000				0									
33,939	15,000				0									
2,626	10,000				0									
_,,	35,000				0									
25,676					0									
1,737					0									
33,372					0									
	20,004		1,370		0	51,605								
1,861					0									
5,157	150,000				0									
52,595	150,000				0									
02,000	16,620				0									
21,044	,				0									
793,426					0									
120,000				50,000	0	348,180		140,000						
250,227	30,000				0	147,000								
100,000														
	15,000													
					0									
	34,100			40,000	0									
	15,000				0									
	236,000				0									
2,042	15,000				0									
		745 000	0.000.005	0.000.040		707474	407.000	445.000	4 007 000					
8,216,760	12,256,700	/45,800	3,698,624	3,082,918	3,645,763	7,871,743	467,200	145,900	1,087,828	#NAME?				

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022





## EXPENDITURES OF CANDIDATES AND ELECTORAL SUBJECTS FOR SOCIAL MEDIA ACCORDING TO THE SELF-DECLARATION REPORT AND ACCORDING TO THE AD LIBRARY ON FACEBOOK AND INSTAGRAM

No.	Name Surname	County	Subject	Self declaration	Declared expenses (in ALL)	Paid until dt. 24.04.2021	No. of advertisements up to dt. 24.04.2021
1	Agron Duka	Durrës	PAA-PD / AN	With Activity	120,000	1,033	
2	Agron Çela	Shkodër	SMI	With Activity	3,547	0	
3	Alban Xhelili	Durrës	SP	With Activity	164,286	164,168	17
4	Aldi Fusha	Tiranë	SMI	With Activity	7,756	12,390	4
5	Alfred Muharemi	Tiranë	SP	With Activity	247,889	74,547	36
6	Alqi Bllako	Tiranë	SP	With Activity	521,000	483,417	76
7	Altin Koltraka	Dibër	SMI	With Activity	1,107	1,107	4
8	Altin Toska	Elbasan	SMI	With Activity	2,723	2,723	2
9	Anduena Qefalia	Tiranë	PD-PD / AN	With Activity	33,725	32,834	19
10	Arben Çuko	Fier	SMI	With Activity	12,732	1,033	1
11	Arben Pëllumbi	Tiranë	SP	With Activity	739,800	490,954	68
12	Arian Jaupllari	Korçë	SP	With Activity	49,500	49,147	11
13	Artur Baku	Durrës	SMI	With Activity	1,655	1,655	2
14	Aurela Kalivaçi	Berat	SMI	With Activity	30,178	0	
15	Bahri Shaqiri	Durrës	SMI	With Activity	52,946	55,755	4
16	Benet Beci	Shkodër	SP	With Activity	150,000	216,619	49
17	Besnik Jakaj	Tiranë	SMI	With Activity	85,431	64,118	47
18	Bledar Çuçi	Gjirokastër	SP	With Activity	292,850	0	
19	Blendi Gurra	Dibër	SMI	With Activity	5,141	0	
20	Bora Muzhaqi	Tiranë	SP	With Activity	165,082	66,183	5
21	Briseida Gjoza	Elbasan	SP	With Activity	27,103	20,547	34
22	Dallëndyshe Bici	Tiranë	SP	With Activity	620,090	569,630	10
23	Damian Gjiknuri	Vlorë	SP	With Activity	78809**		25
24	Denis Hidri	Tiranë	SMI	With Activity	7,755	7,755	1
25	Dhora Shkembi	Korçë	SP	With Activity	31,600	32,421	5
26	Edmond Haxhinasto	Tiranë	SMI	With Activity	94,400	60,711	18
27	Eduart Sharka	Fier	PAA-PD / AN	With Activity	250,227	296,947	31
28	Eljo Hysko	Tiranë	SP	With Activity	195200**		183
29	Elona Guri	Durrës	SMI	With Activity	2,553	2,553	2
30	Endrit Braimllari	Korçë	SMI	With Activity	6,612	6,612	1
31	Enon Karapici	Durrës	SMI	With Activity	3,670	3,670	1
32	Enslemvera Zake	Korçë	SP	With Activity	15,919	0	
33	Eraldo Luku	Durrës	SMI	With Activity	49,217	1,033	4
34	Eriona Bixha	Tiranë	SMI	With Activity	1,526	1,526	6
35	Erisa Xhixho	Tiranë	SMI	With Activity	63,144	63,705	6
36	Ermir Gjinishi	Elbasan	SMI	With Activity	12,000	0	
37	Esmeralda Qirko	Berat	SMI	With Activity	25,473	21,786	6
38	Et'hem Aga	Tiranë	PD-PD / AN	With Activity	36,200	36,447	7

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

REPORT

(In all the calculations made in the following tables, the exchange rate used for the conversion from USD to Lek is 102.35, which is the average exchange rate based on the data of the Bank of Albania for the election campaign period)

**ANNEX R - Table R1** - Candidates who have declared expenses for social media and the amount spent according to the Ad library on Facebook and Instagram.

Payer 1	Amount 1 paid (in USD)	Payer 2	Amount 2 paid (in USD)	Payer 3	Amount 3 paid (in USD)	Payer 4	Amount 4 paid (in USD)
Pa emër	≤100						
Alban Xhelili	1590						
Aldi Fusha	120						
Alfred Muharemi	2320						
WOW DIGITAL	4682						
Altin Koltraka	≤100						
Altin Toska	≤100						
Anduena Qefalia	318						
Pa emër	≤100						
Arben Pëllumbi	4729	Partia Socialiste e Tiranës	26				
Arian Jaupllari	476						
Erando Zalla	≤100						
Bahri Shaqiri	540						
Benet Beci	3679	Pa emër	29				
Besnik Jakaj	600	Pa emër	21				
Bora Muzhaqi Kandidat per Deputet	641						
Briseida Gjoza	199						
Dallëndyshe Bici	3326	WOW DIGITAL	2191				
Partia Socialiste e Shqipërisë	728						
Pa emër	≤100						
Dhora Shkembi	310	Pa emër	4				
Edmond Haxhinasto	574	Pa emër	14				
Eduart Sharka	2876						
Partia Socialiste Tiranë	1021	Ps.al	864				
Elona Guri	≤100						
Pa emër	≤100						
Enon Karapici	≤100						
Eraldo Luku	≤100						
Eriona Bixha	≤100						
Erisa Xhixho	617						
Esmeralda Qirko	211						
Et'hem Aga	353						



### **FINAL OBSERVATION REPORT**



No. of advertisements

Paid until dt.

SEPTEMBER 2020 - JANUARY 2022

No.	Name Surname	County	Subject	Self declaration	(in ALL)	24.04.2021	up to dt. 24.04.2021
39	Etjen Xhafaj	Tiranë	SP	With Activity	333125**	4,298	122
40	Fadil Nasufi	Berat	SP	With Activity	37,500	0	
41	Fatmir Mediu	Tiranë	PR-PD / AN	With Activity	309208**	7,983	28
42	Floida Kërpaçi	Tiranë	SMI	With Activity	153,338	153,120	20
43	Florenc Spaho	Elbasan	SP	With Activity	18,553	0	
44	Gentian Çala	Korçë	SMI	With Activity	20,000	0	
45	Gramoz Ruçi	Fier	SP	With Activity	492,000	0	
46	Ilir Beqaj	Shkodër	SP	With Activity	279,319	41,816	4
47	Jona Leqejza	Shkodër	SP	With Activity	15,636	15,694	5
48	Jonid Nano	Durrës	LRE	With Activity	2,042	2,042	2
49	Juard Myftaraj	Fier	SMI	With Activity	5,745	0	
50	Kejdi Mehmetaj	Fier	SMI	With Activity	17,384	14,352	14
51	Kevin Bibaj	Tiranë	NTH	With Activity	100,000	1,033	3
52	Klajda Gjosha	Tiranë	SMI	With Activity	90,000	72,069	32
53	Kledina Skëndo	Tiranë	SP	With Activity	39200**	51,175	107
54	Klevi Pojana	Tiranë	SMI	With Activity	75,579	75,579	44
55	Klodeta Dibra	Tiranë	SP	With Activity	50,199	51,625	1
56	Kontjana Kuçi	Durrës	SMI	With Activity	3,056	3,056	1
57	Kristian Kina	Fier	SMI	With Activity	36,993	37,273	12
58	Laert Duraj	Gjirokastër	SP	With Activity	10213**		1
59	Lefter Koka	Durrës	SP	With Activity	75,400	64,841	3
60	Lela Berdica	Shkodër	SP	With Activity	50,000	1,033	6
61	Leonard Begiri	Vlorë	SP	With Activity	25,534	29,426	7
62	Leons Hasani	Korçë	SMI	With Activity	33,939	1,033	2
63	Liri Dëma	Vlorë	SMI	With Activity	1,021	0	
64	Melisa Cahani	Tiranë	SMI	With Activity	2,626	2,626	1
65	Miranda Rira	Elbasan	SMI	With Activity	25,676	22,818	21
66	Monika Kryemadhi	Tiranë	SMI	With Activity	370807**	307	21
67	Myrvete Asqeri	Gjirokastër	SMI	With Activity	1,737	0	
68	Nasip Naço	Berat	SP	With Activity	100,000	16,520	12
69	Ogerta Manastirliu	Tiranë	SP	With Activity	23140**		5
70	Përparim Spahiu	Tiranë	SMI	With Activity	33,372	27,429	16
71	Petrit Malaj	Kukës	SP	With Activity	9,240	23,335	17
72	Pranvera Resulaj	Vlorë	SP	With Activity	18,062	17,966	6
73	Renato Basholli	Fier	SMI	With Activity	1,861	0	
74	Saimir Kumrija	Elbasan	SMI	With Activity	5,157	5,157	1
75	Taulant Balla	Elbasan	SP	With Activity	28987**		3
76	Ulsi Manja	Tiranë	SP	With Activity	48,330	38,306	34
77	Vangjel Tavo	Gjirokastër	SMI	With Activity	52,595	52,761	11
78	Vladimir Muka	Elbasan	SMI	With Activity	21,044	15,075	10
79	Vojo Bregu	Tiranë	SMI	With Activity	793,426	595,030	86
80	Xhemal Qefalia	Tiranë	SP	With Activity	46,872	51,625	3
81	Zef Hila	Shkodër	PD-PD / AN	With Activity	150,000	71,036	9

under whose banner he/she is running. It is not required by law to declare it by him / her.

<sup>\*\*</sup> The amount declared as paid by the candidate, but which was carried out by the political party. According to the law, the candidate should not have declared this amount, as the political party is in charge of making this statement.

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

Payer 1	Amount 1 paid (in USD)	Payer 2	Amount 2 paid (in USD)	Payer 3	Amount 3 paid (in USD)	Payer 4	Amount 4 paid (in USD)
PS.al	1356	Partia Socialiste Tiranë	20	Pa emër	20	Marsid Kuqi	22
Partia Republikane e Shqiperise	3348	Pa emër	78				
Floida Kërpaçi	1478	Pa emër	5				
D	47	Him Danai	750				
Pa emër	47	Ilir Beqaj	358				
Jona Legejza	152						
Jonid Nano	≤100						
Kejdi Mehmetaj	139						
Esmerid Murati	≤100						
Pa emër	102	Klajda Gjosha	596				
Partia Socialiste Tiranë	22	Kledina Skëndo	500				
Klevi Pojana	732						
Klodeta Dibra	500						
Kontjana Kuçi	≤100						
Kristian Kina	361						
Partia Socialiste	10						
Adelaida Dajko	628						
Lela Berdica	≤100						
Leonard Beqiri	285						
Pa emër	≤100						
Anisa Braho	≤100						
Miranda Rira	221						
Pa emër	3	LSI	3094				
_	_		_				
Pa emër	7	Jurgen Pilkati	7	Nasip Naço	146		
Partia Socialiste e Shqipërisë	217						
Përparim Spahiu	10	Përparim Spahiu	258				
Pa emër	10	Erion Malaj	216				
Pranvera Resulaj	174						
Pa emër	≤100						
Partia Socialiste e Shqipërisë	287						
Ulsi Manja	371						
Pa emër	1	Vangjel Tavo	510				
Vladimir Muka	146						
Vojo Bregu	5763						
Xhemal Qefalia	500						
Manifesto	688						

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### **FINAL OBSERVATION REPORT**

SEPTEMBER 2020 - JANUARY 2022



Appendix R - Table R2 - Candidates who have declared 0 income and expenses, but according to the Ad Library on Facebook and Instagram, payments have been made for their sites, by the candidate himself or third parties.

No.	Name Surname	County	Subject	Self declaration	Declared expenses (in Lekë)	Paid until dt. 24.04.2021	No. of advertisements up to dt. 24.04.2021	
1	Albana Vokshi	Tiranë	PD-PD / AN	Without activity	0	26,329	1	
2	Aldo Gega	Shkodër	PD-PD / AN	Without activity	0	74,753	17	
3	Alfred Rushaj	Tiranë	PD-PD / AN	Without activity	0	144,963	55	
4	Ana Dhamo	Durrës	SP	Without activity	0	12,287	2	
5	Anduel Tahiraj	Vlorë	SP	Without activity	0	34,279	9	
6	Antoneta Dhima	Fier	SP	With Activity	0	20,031	2	
7	Arben Gjuraj	Shkodër	PD-PD / AN	Without activity	0	63,292	18	
8	Arben Tafaj	Tiranë	PAA-PD / AN	Without activity	0	13,423	18	
9	Arbër Arapi	Fier	SP	With Activity	0	1,033	4	
10	Arbi Agalliu	Vlorë	PD-PD / AN	Without activity	0	12,906	5	
11	Ardit Çela	Vlorë	SMI	With Activity	0	75,476	30	
12	Argita Llani	Dibër	LRE	Without activity	0	1,033	1	
13	Arian Galdini	Tiranë	LRE	Without activity	0	1,033	4	
14	Arkend Balla	Durrës	SP	Without activity	0	1,033	4	
15	Asllan Dogjani	Tiranë	PD-PD / AN	Without activity	0	46,463	25	
16	Bardh Spahia	Shkodër	PD-PD / AN	Without activity	0	210,011	58	
17	Bardhyl Kollçaku	Berat	SP	With Activity	0	1,033	8	
18	Blerdi Liçaj	Tiranë	SMI	With Activity	0	19,927	14	
19	Blerina Gjylameti	Korçë	SP	With Activity	0	26,639	3	
20	Dasantila Tahiraj	Elbasan	SP	With Activity	0	65,254	21	
21	Dashnor Sula	Elbasan	PD-PD / AN	Without activity	0	1,033	1	
22	Dorjan Teliti	Tiranë	PD-PD / AN	Without activity	0	45,533	11	
23	Edmond Spaho	Korçë	PD-PD / AN	With Activity	0	26,329	47	
24	Edona Bilali	Shkodër	SP	With Activity	0	29,736	24	
25	Eduard Shalsi	Tiranë	SP	With Activity	0	459,359	10	
26	Endri Pepa	Elbasan	SP	With Activity	0	1,033	4	
27	Ermonela Valikaj	Tiranë	SP	With Activity	0	96,642	43	
28	Ervin Salianji	Korçë	PD-PD / AN	Without activity	0	1,033	2	
29	Ervis Moçka	Vlorë	SP	With Activity	0	29,323	2	
30	Fation Veizaj	Vlorë	PD-PD / AN	Without activity	0	1,033	1	
31	Ferdinant Çobo	Fier	PR-PD / AN	Without activity	0	1,033	3	
32	Ferdinant Xhaferaj	Durrës	PD-PD / AN	Without activity	0	51,728	78	
33	Flamur Hoxha	Kukës	PD-PD / AN	Without activity	0	26,226	28	
34	Gazment Bardhi	Elbasan	PD-PD / AN	Without activity	0	185,437	106	
35	Gent Sinani	Tiranë	LRE	Without activity	0	1,033	2	



### **FINAL OBSERVATION REPORT**

SEPTEMBER 2020 - JANUARY 2022

Payer 1	Amount 1 paid (in USD)	Payer 2	Amount 2 paid (in USD)	Payer 3	Amount 3 paid (in USD)
Aplikacione.com	255				
Aldo Gega	724				
Alfred Rushaj	1317	Renald Rista	40	Pa emër	47
Lorin Biu	119	Reliaid Rista	40		47
Anduel Tahiraj	477				
Antoneta Dhima	194				
	613				
Arben Gjuraj					
Arben Tafaj	130 ≤100	Pa emër	≤100		
Arber Arapi					
Arbi Agalliu	111	Pa emër	14	D "	0.7
Ardit Çela	684	Alket Braho	20	Pa emër	27
Pa emër	≤100				
Pa emër	≤100				
Florint Balla	≤100				
Asllan Dogjani	866				
Bardh Spahia	2034				
Mariglen Gjika	≤100				
Blerdi Liçaj	193				
Blerina Gjylameti	258				
Dasantila Tahiraj	1598				
Pa emër	≤100				
Dorjan Teliti	441				
Edmond Spaho	255				
Edona Bilali	415				
WOW DIGITAL	2288	Eduard Shalsi	2156	Pa emër	5
Endri Pepa	≤100				
Ermonela Valikaj	912	Pa emër	24		
Pa emër	≤100	Besmir Semanaj	≤100		
Pa emër	214	Ervis Moçka	30	Klaud Gjipali	40
Pa emër	≤100	Pa emër	≤100		
Ferdinant Cobo	≤100				
Ferdinand Xhaferaj	753	Pa emër	54		
Aplikacione.com	448				
Gazment Bardhi	3376				
Gent Sinani	≤100				



### **FINAL OBSERVATION REPORT**



Declared

Paid until dt.

No. of

SEPTEMBER 2020 - JANUARY 2022

No.	Name Surname	County	Subject	Self declaration	expenses (in Lekë)	24.04.2021	advertisements up to dt. 24.04.2021
36	Gjon Ndoj	Lezhë	LN	Without activity	0	1,033	8
37	Halit Valteri	Tiranë	SP	Without activity	0	186,986	9
38	Helidon Bushati	Shkodër	PD-PD / AN	Without activity	0	230,557	41
39	Ilir Metaj	Vlorë	SP	With Activity	0	248,420	20
40	Ilir Ndraxhi	Durrës	SP	With Activity	0	14,971	3
41	Ina Zhupa	Vlorë	PD-PD / AN	Without activity	0	1,033	1
42	Ivi Kaso	Tiranë	PD-PD / AN	Without activity	0	68,455	12
43	Jozefina Topalli	Tiranë	LN	Without activity	0	157,043	46
44	Kabir Fishta	Shkodër	SP	With Activity	0	124,520	7
45	Kasëm Mahmutaj	Berat	PD-PD / AN	Without activity	0	1,033	1
46	Keida Bejaj	Durrës	SP	Without activity	0	1,033	1
47	Klementina Meçi	Durrës	SP	Without activity	0	91,067	32
48	Klevis Xhoxhi	Elbasan	SP	With Activity	0	1,033	1
49	Kristaq Skenderi	Elbasan	SP	With Activity	0	1,033	1
50	Laura Ferati	Vlorë	SP	Without activity	0	18,482	10
51	Lefter Gështenja	Elbasan	PD-PD / AN	Without activity	0	121,422	62
52	Leke Negri	Tiranë	LN	Without activity	0	14,352	18
53	Luçiano Boçi	Elbasan	PD-PD / AN	Without activity	0	24,780	19
54	Najada Çomo	Tiranë	SP	Without activity	0	1,033	1
55	Niko Peleshi	Korçë	SP	With Activity	0	21,889	7
56	Orjola Pampuri	Tiranë	PD-PD / AN	Without activity	0	56,271	20
57	Ornaldo Rakipi	Tiranë	SP	With Activity	0	1,033	2
58	Plarent Ndreca	Tiranë	SP	With Activity	0	186,277	108
59	Romina Kuko	Tiranë	SP	Without activity	0	1,033	93
60	Rrahman Rraja	Durrës	SP	With Activity	0	43,192	24
61	Shkëlqim Bullari	Elbasan	SP	Without activity	0	14,662	5
62	Shpëtim Axhani	Fier	PLL-PD / AN	Without activity	0	1,033	2
63	Silva Hasaj	Fier	FRD-PD / AN	Without activity	0	42,436	14
64	Taulanda Jupi	Tiranë	PD-PD / AN	Without activity	0	1,033	4
65	Teuta Ramaj	Vlorë	SP	With Activity	0	29,943	12
66	Toni Gogu	Tiranë	SP	With Activity	0	70,520	22
67	Viron Bezhani	Tiranë	SMI	With Activity	0	15,281	7
68	Vullnet Sinaj	Vlorë	SP	With Activity	0	66,493	3
69	Ylli Shehu	Tiranë	SP	With Activity	0	21,786	3

në siglen e të cilit ai kandidon. Sipas ligjit nuk është detyrim për t'u deklaruar prej saj/tij.

### **OBSERVATION REPORT**

SEPTEMBER 2020 - JANUARY 2022

**FINAL** 

Payer 1	Amount 1 paid (in USD)	Payer 2	Amount 2 paid (in USD)	Payer 3	Amount 3 paid (in USD)
Gjon Ndoj	194	Pa emër	≤100		
RED Targeting	1811				
Pa emër	26	Helidon Bushati	2207		
Bledar Leka	362	Ilir Metaj	2871		
Nerela Ndraxhi	145				
Pa emër	≤100	Ina K. Zhupa	≤100		
Ivi Kaso	663				
Pa emër	37	Genar Topalli	40	Jozefina Topalli	1444
Pa emër	28	Kabir Fishta	1178		
Pa emër	≤100				
Pa emër	≤100				
Fatjon Meçi	882				
Pa emër	≤100				
Pa emër	≤100				
Laura Ferati	179				
Lefter Gështenja	2306				
Leke Negri	139				
Pa emër	29	Luciano Boci	211		
Pa emër	≤100				
Blinks	212				
Pa emër	4	Orjola Pampuri	541		
Pa emër	≤100				
Partia Socialiste	138*	Plarent Ndreca	1820		
Pa emër	≤100	Pa emër	≤100	Partia Socialiste e Tiranës	≤100
Pa emër	28	Rrahman Rraja	394	PS.al	1241*
Shkelqim Bullari	142				
Igli Axhani	≤100				
Kristian Prendi	411				
Pa emër	≤100	Taulanda Jupi	≤100		
Teuta Ramaj	290				
Toni Gogu	683				
Pa emër	3	Elda Gjoka	145		
Pa emër	5	Vullnet Sinaj	2119		
Ylli Shehu	211				

### **FINAL OBSERVATION REPORT**

SEPTEMBER 2020 - JANUARY 2022



Appendix R - Table R3 - Candidates who have not submitted a self-declaration report at all, but according to the Ad Library on Facebook and Instagram have expenses on these platforms.

No.	Name Surname	County	Subject	Self declaration	Declared expenses (in Lekë)	Paid until dt. 24.04.2021	No. of advertise- ments up to dt. 24.04.2021	
1	Adriatik Alimadhi	Tiranë	PBK	No Report	n/a	205	5	
2	Aferdita (Pushi)Gjini	Berat	PD-PD / AN	No Report	n/a	25,606	8	
3	Agron Shehaj	Tiranë	PD-PD / AN	No Report	n/a	1,653,033	117	
4	Aida Gjini	Elbasan	NTH	No Report	n/a	1,033	1	
5	Andi Përmeti	Korçë	BD	No Report	n/a	614	20	
6	Andia Ulliri	Durrës	PD-PD / AN	No Report	n/a	1,033	1	
7	Arben Skënderaj	Tiranë	BD	No Report	n/a	42,436	7	
8	Ardian Zeneli	Elbasan	PD-PD / AN	No Report	n/a	1,033	1	
9	Ardian Kollozi	Vlorë	BD	No Report	n/a	41,403	9	
10	Artemis Malo	Gjirokastër	SP SP (AN)	No Report	n/a	1,033	2	
11	Artur Roshi	Tiranë	PD-PD / AN	No Report	n/a	10,738	7	
12	Astrit Patozi	Tiranë	BD DD / AN	No Report	n/a	205	50	
14	Atird Hoxha Belind Këllici	Vlorë Tiranë	PD-PD / AN PD-PD / AN	No Report No Report	n/a n/a	37,377 256,473	11	
15	Bledar Burgjia	Vlorë	BD BD	No Report	n/a	1,033	2	
16	Blerina Reçi	Durrës	PD-PD / AN	No Report	n/a	33,660	8	
17	Brunilda Dhrami	Tiranë	NTH	No Report	n/a	1,033	1	
18	Bujar Leskaj	Vlorë	PD-PD / AN	No Report	n/a	100,669	58	
19	Daniel Garunia	Tiranë	SDP	No Report	n/a	1,033	3	
20	Dashamir Shehi	Tiranë	PD-PD / AN	No Report	n/a	91,996	8	
21	David Velai	Shkodër	NTH	No Report	n/a	1,033	5	
22	Denis Dema	Tiranë	NTH	No Report	n/a	1,033	10	
23	Dilaver Kamberaj	Fier	PD-PD / AN	No Report	n/a	1,033	2	
24	Edison Hasanaj	Kukës	BD	No Report	n/a	1,033	1	
25	Edmond Stojku	Tiranë	ADR	No Report	n/a	1,033	1	
26	Edmond Isaku	Dibër	PD-PD / AN	No Report	n/a	42,746	4	
27	Emilja Koliqi	Shkodër	PD-PD / AN	No Report	n/a	34,795	18	
28	Endrit Shabani	Tiranë	NTH	No Report	n/a	146,202	37	
29	Erbi Ago	Tiranë	NTH	No Report	n/a	12,184	6	
30	Erion Murataj	Elbasan	BD	No Report	n/a	98,810	58	
31	Eva Xhediku	Tiranë	NTH	No Report	n/a	1,033	8	
32	Flavia Nuraj	Tiranë	SDP	No Report	n/a	32,214	17	
33	Gjovalin Laska	Lezhë	PD-PD / AN	No Report	n/a	14,249	2	
34	Gledi Kryemadhi	Tiranë	ADR	No Report	n/a	1,033	4	
35	Greta Bardeli	Shkodër	PD-PD / AN	No Report	n/a	43,159	26	
36	Helga Sallaku	Shkodër	PD-PD / AN	No Report	n/a	1,033	1	
37	Igli Cara	Durrës	PD-PD / AN	No Report	n/a	1,033	1	
38	Ilda Dhori	Fier	PD-PD / AN	No Report	n/a	36,551	24	
39 40	Ilir Balla	Tiranë Shkodër	BD PD-PD / AN	No Report	n/a n/a	1,033	13	
41	Izmira Rusi(Ulqinaku) Korab Lita	Tiranë	PD-PD / AN	No Report No Report	n/a	86,420	33	
42	Lediana Fratari	Tiranë	PD-PD / AN	No Report	n/a	277,433	77	
43	Lodovik Hasani	Shkodër	PD-PD / AN	No Report	n/a	43,468	14	
44	Luljeta Sejko	Fier	PD-PD / AN	No Report	n/a	1,033	2	
45	Lumturi Hasa	Elbasan	PD-PD / AN	No Report	n/a	15,178	6	
46	Mirela Oktrova	Tiranë	BD	No Report	n/a	51,625	3	
47	Nada Daullja	Vlorë	PD-PD / AN	No Report	n/a	50,489	13	
48	Ndrec Llusku	Tiranë	SDP	No Report	n/a	33,040	18	
49	Nimet Musaj	Fier	SP	No Report	n/a	49,973	13	
50	Oerd Bylykbashi	Durrës	PD-PD / AN	No Report	n/a	512	12	
51	Panajot Soko	Tiranë	NTH	No Report	n/a	56,271	5	
52	Plarent Aleksi	Berat	BD	No Report	n/a	1,033	1	
53	Ramadan Likaj	Shkodër	PD-PD / AN	No Report	n/a	100,566	32	
54	Rigerta Loku	Lezhë	NTH	No Report	n/a	12,080	1	
55	Robert Bitri	Fier	SP	No Report	n/a	1,033	1	
56	Roel Simaku	Durrës	BD	No Report	n/a	16,210	23	
57	Rudina Hajdaraj	Elbasan	NTH	No Report	n/a	4,810	19	
58	Shpëtim Idrizi	Tiranë	PD-PD / AN	No Report	n/a	55,032	9	
59	Spartak Koltraka	Dibër	SP	No Report	n/a	1,033	7	
60	Tom Doshi	Tiranë	SDP	No Report	n/a	485,791	24	
61	Tonin Uldedaj	Shkodër	BD	No Report	n/a	153,120	29	
62	Valbona Sakollari	Durrës	BD	No Report	n/a	33,143	24	
63	Zoj Ndou	Tiranë	SDP	No Report	n/a	1,033	2	
I <sup>∞</sup> Ihic	amount was not haid by t	ne candidate i	nut ny the electoral	SUDJECT LINGER				

<sup>\*</sup> This amount was not paid by the candidate, but by the electoral subject under whose banner he/she is running. It is not required by law to declare it by him / her.



### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

**FINAL** 

Payer 1	Amount 1 paid (in USD)	Payer 2	Amount 2 paid (in USD)	Payer 3	Amount 3 paid (in
					USDI
Partia Balli Kombetar  Aferdita Gjini	189* 248	No name	2		
Agron Shehaj	31879	No name	210		
Napolon Laska	≤100	140 Harric	210		
Bindja Demokratike	423*	No name	6		
No name					
Arben Skenderaj	411				
Ardian Zeneli	≤100				
Ardi Kollozi	401				
No name Artur Roshi	≤100 255				
Bindja Demokratike	6826*	No name	2		
Atird Hoxha	362	140 Harric	2		
Belind Këlliçi	4215	No name	23		
Bledar Burgjia	≤100				
Blerina Reci	326				
No name	≤100				
Mario Nesturi	1468	Adhurim Kuçaj	267	Pa emër	46
Danjel Garunja	≤100				
Elkier Bushkolaj	891				
David Velaj	≤100				
Denis Dema Dilaver Kamberaj	≤100 ≤100				
Edison Hasanaj	≤100				
No name	≤100				
Edmond Isaku	414				
Emilia Koligi	333	No name	4		
Endrit Shabani	2864	No name	111		
Erbi Ago	118				
Kledisa Qevani	957				
Eva Xhediku	≤100		7		
Ermir Nuraj	309	No name	3		
Sokol Tafaj Gledi Kryemadhi	138 ≤100				
No name	17	Greta Bardeli	401		
Helga Sallaku	≤100	Oreta Daraen	401		
No name	≤100				
Ilda Dhori	515				
Ilir Balla	≤100				
Izmira Rusi	1570				
Voto 33 Korab Lita	837				
Lediana Fratari	4772				
Tirana1	421				
No name  Lumturi Hasa	≤100 147				
Mirela Oktrova	500				
Nada Daullja	489				
Ndrec Llusku	683				
Nimet Musaj	206	Endri Musaj	278		
No name	5	Democratic Party	367*		
Panajot Soko	545				
No name	≤100				
Ramadan Likaj	974				
Napolon Laska Robert Bitri	117 ≤100				
No name	<u>≤100</u>	Roel Simaku	146		
No name	47	Nisma Thurje	2639*		
Shpëtim Idrizi	1030	Tridije	2000		
No name	≤100				
Tom Doshi	4705				
No name	21	Tonin Uldedaj	1462		
Valbona Shkurti-Sakollari	321				
web:in	≤100				

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022



**Appendix R - Table R4** - Candidates who have declared expenses for social media, while according to the Ad Library on Facebook and Instagram have not made expenses on this media.

No	Name Surname	County	Subject	Self Declaration	Declared expenses (in ALL)	Paid until April 24
1	Agron Çela	Shkodër	SMI	With Activity	3,547	0
2	Aurela Kalivaçi	Berat	SMI	With Activity	30,178	0
3	Bledar Çuçi	Gjirokastër	SP	With Activity	292,850	0
4	Blendi Gurra	Dibër	SMI	With Activity	5,141	0



Appendix R - Table R5 - Candidates who have made expenditures on Facebook and Instagram even after election day.

Nr.	Emër Mbiemër	Qarku	Subjekti	Vetdeklarimi	Shpenzime të deklaruara (në Lekë)	Paguar deri më dt. 24.04.2021	Nr. i reklamave deri më dt. 24.04.2021	Shuma e paguar pas dt. 24.04.2021	Nr. i reklamave pas dt. 24.04.2021
1	Agron Shehaj	Tiranë	PD-PD / AN	No Report	n/a	1,653,033	117	1,660,157	174
2	Alfred Muharemi	Tiranë	SP	With Activity	247,889	74,547	36	164,994	11
3	Anduel Tahiraj	Vlorë	SP	Without activity	0	34,279	9	14,971	4
4	Artur Roshi	Tiranë	PD-PD / AN	No Report	n/a	10,738	7	15,591	3
5	Asllan Dogjani	Tiranë	PD-PD / AN	Without activity	0	46,463	25	42,952	1
6	Belind Këlliçi	Tiranë	PD-PD / AN	No Report	n/a	256,473	11	177,327	12
7	Benet Beci	Shkodër	SP	With Activity	150,000	216,619	49	162,896	15
8	Bujar Leskaj	Vlorë	PD-PD / AN	No Report	n/a	100,669	58	81,616	9
9	Dasantila Tahiraj	Elbasan	SP	With Activity	0	65,254	21	99,740	5
10	Edona Bilali	Shkodër	SP	With Activity	0	29,736	24	13,113	10
11	Endrit Shabani	Tiranë	NTH	No Report	n/a	146,202	37	160,967	4
12	Etjen Xhafaj	Tiranë	SP	With Activity	333125**	4,298	122	23,644	16
13	Ferdinant Xhaferaj	Durrës	PD-PD / AN	Without activity	0	51,728	78	30,868	4
14	Flamur Hoxha	Kukës	PD-PD / AN	Without activity	0	26,226	28	20,031	1
15	Gazment Bardhi	Elbasan	PD-PD / AN	Without activity	0	185,437	106	163,135	22
16	Ilda Dhori	Fier	PD-PD / AN	No Report	n/a	36,551	24	16,623	4
17	Ilir Metaj	Vlorë	SP	With Activity	0	248,420	20	85,388	13
18	Jorida Tabaku	Tiranë	PD-PD / AN	Without activity	0		29	89,828	2
19	Lediana Fratari	Tiranë	PD-PD / AN	No Report	n/a	277,433	77	215,276	14
20	Lefter Gështenja	Elbasan	PD-PD / AN	Without activity	0	121,422	62	116,673	12
21	Lulzim Basha	Tiranë	PD-PD / AN	Without activity	0		65	1,686,589	47
22	Ndrec Llusku	Tiranë	SDP	No Report	n/a	33,040	18	37,480	2
23	Shpëtim Idrizi	Tiranë	PD-PD / AN	No Report	n/a	55,032	9	51,315	3
24	Vullnet Sinaj	Vlorë	SP	With Activity	0	66,493	3	152,810	5
* Th	is amount was not na	aid by the c	andidate but h	v the electoral	subject und	or			•

<sup>\*</sup> This amount was not paid by the candidate, but by the electoral subject under whose banner he/she is running. It is not required by law to declare it by him / her.

<sup>\*\*</sup> The amount declared as paid by the candidate, but which was carried out by the political party. According to the law, the candidate should not have declared this amount, as the political party is in charge of making this statement.

### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

**REPORT**SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

<	◀

	No	Name Surname	County	Subject	Self Declaration	Declared expenses (in ALL)	Paid until April 24
1	5	Enslemvera Zake	Korçë	SP	With Activity	15,919	0
` [	6	Ermir Gjinishi	Elbasan	SMI	With Activity	12,000	0
	7	Fadil Nasufi	Berat	SP	With Activity	37,500	0
	8	Florenc Spaho	Elbasan	SP	With Activity	18,553	0
ĺ	9	Gentian Çala	Korçë	SMI	With Activity	20,000	0

Numri i reklamave Total	Shuma totale e shpenzuar (në Lekë)	Paguesi 1	Shuma 1 e paguar (në USD)	Paguesi 2	Shuma 2 e paguar (në USD)	Paguesi 3	Shuma 3 e paguar (në USD)	Paguesi 4	Shuma 4 e paguar (në USD)	Shuma totale e shpenzuar (në USD)
291	3,313,189	Agron Shehaj	31879	No name	210					32,089
47	239,540	Alfred Muharemi	2320							2,320
13	49,250	Anduel Tahiraj	477							477
10	26,329	Artur Roshi	255							255
26	89,415	Asllan Dogjani	866							866
23	433,800	Belind Këlliçi	4215	No name	23					4,238
64	379,514	Benet Beci	3679	No name	29					3,708
67	182,285	Mario Nesturi	1468	Adhurim Kuçaj	267	No name	46			1,781
26	164,994	Dasantila Tahiraj	1598							1,598
34	42,849	Edona Bilali	415							415
41	307,169	Endrit Shabani	2864	No name	111					2,975
138	27,942	PS.al	1356*	Socialist Party Tirana	20*	No name	20	Marsid Kuqi	22	1,418
82	82,596	Ferdinand Xhaferaj	753	No name	54					807
29	46,256	Aplikacione.com	448							448
128	348,572	Gazment Bardhi	3376							3,376
28	53,174	Ilda Dhori	515							515
33	333,807	Bledar Leka	362	Ilir Metaj	2871					3,233
31	89,828	Democratic Party	1815*							1,815
91	492,709	Lediana Fratari	4772							4,772
74	238,095	Lefter Gështenja	2306							2,306
112	1,686,589	Lulzim Basha	4425	Democratic Party	30995*					35,420
20	70,520	Ndrec Llusku	683							683
12	106,348	Shpëtim Idrizi	1030							1,030
8	219,303	No name	5	Vullnet Sinaj	2119					2,124

### **FINAL OBSERVATION REPORT**

SEPTEMBER 2020 - JANUARY 2022



### "Appendix R - Table R6 - Detailed spending on Facebook and Instagram by / for electoral subjects

The following table contains the electoral subjects (political parties and independent candidates) who have made payments on Facebook and Instagram for their candidates or for their other pages on these social networks.

Specifically, in the line with ordinal integer number (1,2,3, ... 20) is presented the subject that has made the payment, while in the next lines of each subject number (1.1, 1.2, 2.1, 2.2, .... 20.1) is presented the beneficiary candidate or the site for which this subject has made the payment. The columns on the side contain respectively the number of ads for which it was paid and the respective amount paid".

	Payers	Number of ads	Amount spent (in USD)
1	Democratic Conviction	103	7,751
1.1	Andi Permeti	28	423
1.2	Astrit Patozi	66	6,826
1.3	Democratic Conviction	9	502
2	Tirana Democrats	13	824
2.1	Tirana Democrats	13	824
3	Elton Debreshi Official Page	15	285
3.1	Elton Debreshi Official Page	15	285
4	Fatmir Roshi	1	410
4.1	PBKD(National Democratic Front Party -(Balli Kombëtar Demokrat))	1	410
5	SMI	24	3,594
5.1	Socialist Movement for Integration	2	500
5.2	Monika Kryemadhi	22	3,094
6	Nisma Thurje	34	3,889
6.1	Nisma #Thurje	13	1,250
6.2	Rudina Hajdari	21	2,639
7	Partia Balli Kombetar	4	189
7.1	Adriatik Alimadhi - Official Page	4	189
8	Democratic Party	126	38,927
8.1	Jorida Tabaku	31	1,815
8.2	Lulzim Basha	65	30,995
8.3	Oerd Bylykbashi	12	367
8.4	Democratic Party of Albania	18	5,750
9	Democratic Party of Albania	23	1,971
9.1	Gent Strazimiri	23	1,971
10	Justice, Integration and Unity Party	21	1,622
10.1	Justice, Integration and Unity Party	21	1,622
11	Republican Party of Albania	28	3,348
11.1	Fatmir Mediu	28	3,348
12	Socialist Party	165	39,315
	Edi Rama	3	1,500
	Socialist Party of Albania	65	37,677
12.3	Plarent Ndreca	97	138
13	Socialist Party Durrës	1	102
13.1	Socialist Party Durrës	1	102
14	Socialist Party of Albania	335	55,065
	Damian Gjiknuri	25	728
	Ogerta Manastirliu	5	217
	Socialist Party of Albania	138	29,979
14.4	Socialists	164	23,854
14.5	Taulant Balla	3	287
15	Socialist Party Tirana	421	1,502
	Arbjan Mazniku	99	182
15.2	Eljo Hysko	176	1,021
15.3	Fatmir Xhafaj	107	173
15.4	Socialist Party Tirana	39	126
16	Socialist Party Tirana	99	117
16.1	Ervin Bushati	99	117
17	PBDNJ	14	564
17.1	PBDNJ	14	564
18	PS.al	110	4,315
18.1	Eljo Hysko	13	864
10.1	<u> </u>		007



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**OBSERVATION** 

	Payers	Number of ads	Amount spent (in USD)			
18.2	Etjen Xhafaj	67	1,356			
18.3	Gerta Duraku	17	363			
18.4	Socialist Party Durrës	6	214			
18.5	Rrahman Rraja	2	1,241			
18.6	shkodra.voton	4	165			
18.7	Tirana for Socialist Party	1	112			
19	These ads ran without a disclaimer*	5	158			
19.1	Socialist Party of Albania	5	158			
20	Web:in Development House	12	211			
20.1	Social Democratic Party of Albania	12	211			
Total 1554 164,159						
* The payer	* The payer has not stated that he would make a political advertisement					

### "Annex R - Table R7 - Amounts spent and declared by electoral subjects for social media

The following table contains the amount stated, in the self-declaration reports, by each electoral subject (political party and independent candidate) for social media expenditures and the amount spent on Facebook and Instagram platforms according to their advertising library. These data are reflected in the first and second column after the name of the electoral subject, while in the last column is presented the number of advertisements for each subject."

No	Party	Declared amount spent on social media	The amount spent by the subject on Facebook	Difference	Number of paid ads on the Facebook platform
1	Socialist Party of Albania	10,781,855	10,293,749	(488,106)	1,134
2	Democratic Party	6,715,528	4,270,247	(2,445,281)	148
3	Democratic Obedience Party	772,500	793,315	20,815	103
4	Nisma Thurje Party	400,000	398,039	(1,961)	34
5	Socialist Movement for Integration	0	367,846	367,846	24
6	Albanian Republican Party	0	342,668	342,668	28
7	Justice, Integration and Unity Party	1,200,000	166,012	(1,033,988)	15
8	Human Rights Union Party	73,000	57,725	(15,275)	14
9	National Democratic Front Party - (Balli Kombëtar Demokrat)	0	41,964	41,964	1
10	Elton Debreshi	0	29,170	29,170	15
11	Social Democratic Party	0	21,596	21,596	12
12	National Front Party	38,000	19,344	(18,656)	4
13	New Democratic Spirit Party	118,500	-	118,500	-
14	Movement for Change Party	116,096	-	116,096	-
15	The Legality Movement Party	0	-	-	-
16	Christian Democratic Party of Albania	0	-	-	-
17	Environmentalist Agrarian Party	0	-	-	-
18	Albanian Democratic Union Party	0	-	-	-
19	Christian Democratic Party	0	-	-	-
20	Liberal Democrat Union Party	0	-	-	-
21	Time of Albania Party	0	-	-	-
22	National Conservative Party Albania	0	-	-	-
23	People's Union of Albanian Pensioners Party	0	-	-	-
24	Albanian Emigration Party	0	-	-	-
25	Albanian Democratic Movement Party	0	-	-	-
26	New Democracy Alliance Party	0	-	-	-
27	New Movement Party	0	-	-	-
28	Party Movement for National Development	0	-	-	-
29	Boiken Abazi	0	-	-	-
30	Kreshnik Merxhani	0	-	-	-
31	Iljaz Shehu	0	-	-	-
32	Pal Shkambi	0	-	-	-
	Total	20,215,479	16,801,674	(2,944,613)	

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022





### CANDIDATES WHO HAVE NOT SUBMITTED A SELF-DECLARATION REPORT

The following table contains the list of 1,166 candidates who have not fulfilled the legal obligation to submit a self-declaration report for the financial activity of their election campaign. In the first column is the name of the candidate, in the second column the District (electoral zone) where he ran, while in the third column is the Electoral Subject under whose logo he/she ran. The table is sorted alphabetically by candidate names.

anë BD asan NTH chë ABEOK anë ADR er PS asan ABEOK dër PLDSH er ABEOK anë PSD
chë ABEOK anë ADR er PS asan ABEOK oër PLDSH er ABEOK anë PSD
anë ADR er PS usan ABEOK bër PLDSH er ABEOK anë PSD
er PS Isan ABEOK DÖR PLDSH DER ABEOK DER PSD
san ABEOK për PLDSH er ABEOK anë PSD
er PLDSH ABEOK anë PSD
er ABEOK anë PSD
anë PSD
rës ABEOK
er ADR
anë PBK
rës ADR
er PBK
në PBK
rës PLDSH
rat PD-PD / AN
rës NTH
isan ABEOK
rës PD-PD / AN
rhë NTH
er ABEOK
er ABEOK
anë PLDSH
anë BD
anë PD-PD / AN
er PD-PD / AN
rhë PD-PD / AN
rës BD
rës ABEOK
anë ABEOK
isan NTH
në PSD
në ADR
kës ABEOK
në BD
isan ABEOK
orë PSD
anë ADR
anë ADR
orë PBK
në PSD
rës BD
kës PSD
orë ABEOK
në PLDSH
rës BD

No	Name Surname	District	Subject
48	Aldo Rubiku	Durrës	BD
49	Aledija Unuri	Shkodër	NTH
50	Aleks Bezhani	Berat	ABEOK
51	Aleksander Kodheli	Tiranë	NTH
52	Aleksandro Biri	Durrës	ADR
53	Algert Skenderi	Tiranë	ABEOK
54	Algerta Plakaxhiu	Elbasan	NTH
55	Alida Salillari	Tiranë	NTH
56	Alket Kazerma	Korçë	NTH
57	Alketa Mukavelati	Berat	PD-PD / AN
58	Alketa Lugaj	Fier	PD-PD / AN
59	Alketa Pjetri	Lezhë	PSD
60	Alma Guma	Fier	PSD
61	Alma Muda	Durrës	ABEOK
62	Alma Ramku	Korçë	ABEOK
63	Alma Harizi	Tiranë	ABEOK
64	Alma Çuni	Elbasan	PBK
65	Almer Zyka	Vlorë	PLDSH
66	Almida Abazi	Fier	BD
67	Alta Haluci	Vlorë	PD-PD / AN
68	Altin Naçi	Berat	NTH
69	Altin Allidri	Berat	PSD
70	Altin Gjeloshaj	Shkodër	ABEOK
71	Alvis Rajta	Lezhë	PLDSH
72	Amarild Sheqi	Vlorë	PLDSH
73	Amarilda Shuti	Gjirokastër	NTH
74	Amarilda Alimadhi	Tiranë	BD
75	Amarilda Lamaj	Vlorë	PBK
76	Amarildo Sallo	Vlorë	ADR
77	Ambra Mema	Tiranë	ADR
78	Amel Pervizi	Shkodër	NTH
79	Amela Zaganjori	Shkodër	PSD
80	Amina Shehu	Berat	ADR
81	Amversa Bardhaj	Shkodër	BD
82	Ana Xhelo	Tiranë	PLDSH
83	Ana Turhani	Berat	ADR
84	Anastasia Kamberi	Gjirokastër	BD
85	Andi Bevapi	Elbasan	NTH
86	Andi Demo	Fier	NTH
87	Andi Përmeti	Korçë	BD
88	Andi Turhanaj	Fier	ADR
89	Andia Ulliri	Durrës	PD-PD / AN
90	Andon Qako	Berat	ABEOK
91	Andrea Mano	Korçë	PD-PD / AN
92	Andreas Metushi	Korçë	ABEOK
93	Andri Koroveshi	Tiranë	BD
94	Anduela Ismaili	Vlorë	NTH

### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

No	Name Surname	District	Subject
95	Anduela Caca	Gjirokastër	PSD
96	Anduen Hymeri	Korçë	ABEOK
97	Anila Bishqemi	Elbasan	PD-PD / AN
98	Anila Hysenbegasi	Korçë	PD-PD / AN
99	Anila Bitri	Berat	PSD
100	Anila Prifti	Fier	BD
101	Anila Merdani	Dibër	ABEOK
102	Anisa Xhika	Dibër	PS
103	Anisa Aliu	Vlorë	NTH
104	Anisa Hoxha	Berat	PSD
105	Anisa Kaloshi	Fier	PLDSH
106	Anisa Çako	Fier	PLDSH
107	Anisa Saraçi	Tiranë	ABEOK
108	Anita Dervishi	Durrës	ABEOK
109	Anjeza Mulleti	Durrës	PLDSH
110	Antigona Hajdaraj	Kukës	ADR
111	Antionin Halla	Fier	PBK
112	Antoneta Rustemi	Berat	BD
113	Antonio Jorgji	Durrës	PSD
114	Antonio Tarllamishi	Tiranë	PLDSH
115	Anula Mama	Gjirokastër	ABEOK
116	Anxhela Tabaku	Berat	NTH
117	Anxhela Delibashi	Berat	NTH
118	Anxhela Nune	Korçë	PSD
119	Anxhela Damjani	Tiranë	PLDSH
120	Anxhela Zavalani	Tiranë	BD
121	Anxhela Deçka	Vlorë	ADR
122	Anxhelo Nika	Shkodër	ABEOK
123	Arba Sinakoli	Tiranë	ABEOK
124	Arben Myzegari	Fier	BD
125	Arben Skënderaj	Tiranë	BD
126	Arbër Ndreu	Kukës	NTH
127	Arbër Roshi	Fier	ADR
128	Arbri Haxhiu	Durrës	PLDSH
129	Ardi Mugri	Shkodër	PBK
130	Ardian Zeneli	Elbasan	PD-PD / AN
131	Ardian Sulollari	Tiranë	NTH
132	Ardian Nikulaj	Lezhë	PSD
133	Ardian Lazaj	Fier	BD
134	Ardian Kollozi	Vlorë	BD
135	Ardian Gjuzi	Elbasan	ABEOK
136	Ardian Dusho	Tiranë	PBK
137	Ardian Këlliçi	Shkodër	ADR
138	Ardiana Lala	Vlorë	PLDSH
139	Ardiana Kraja	Shkodër	PBK
140	Ardiana Lamaj	Vlorë	PBK
141	Ardit Benja	Berat	PD-PD / AN
142	Ardit Rama	Dibër	NTH
143	Ardit Kola	Tiranë	NTH
144	Ardit Kullafi	Elbasan	PSD
145	Ardit Sina	Tiranë	PLDSH
146	Ardit Shehaj	Lezhë	BD
147	Ardit Gaçi	Durrës	ABEOK
148	Ardit Stojku	Vlorë	ADR
149	Arian Samarxhiu	Elbasan	BD
150	Arife Molla	Berat	PBK
151	Arindo Lulaj	Fier	NTH
152	Arjan Ferko	Fier	PSD
IJZ	Aljali Ferko	1 101	F 3D

No			I	I
154         Arjan Avdolli         Korçë         ABEOK           155         Arjan Hoxha         Tiranë         ABEOK           156         Arjan Kullolli         Tiranë         ADR           157         Arjana Ishmi         Shkodër         PSD           158         Arjen Gjiriti         Korçë         BD           159         Arleta Kasmi         Durrës         ADR           160         Arlind Mesi         Shkodër         NTH           161         Arlinda Resemi         Vlorë         BD           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Toro         Tiranë         PBK           164         Arlindo Vogli         Elbasan         ADR           165         Armandi Korça         Durrës         PLDSH           166         Armandi Korça         Durrës         PLDSH           167         Armandi Korça         Durrës         PLDSH           168         Armandi Korça         Durrës         PLDSH           169         Arqile Janku         Vlorë         ADR           167         Armandi Korça         Durrës         PDK           170         Arsen Belaj	No	Name Surname	District	Subject
155         Arjan Hoxha         Tiranë         ABEOK           156         Arjan Kullolli         Tiranë         ADR           157         Arjana Ishmi         Shkodër         PSD           158         Arjen Gjiriti         Korçë         BD           159         Arjeta Kasmi         Durrës         ADR           160         Arlind Mesi         Shkodër         NTH           161         Arlind Mesi         Shkodër         NTH           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Yogli         Elbasan         ABEOK           164         Arlindo Vogli         Elbasan         ABEOK           165         Armandi Korça         Durrës         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armandi Murataj         Fier         ADR           168         Armin Narta         Vlorë         ABEOK           170         Arsen Belaj	153	Arjan Devollaj	Vlorë	BD
156         Arjan Kullolli         Tiraně         ADR           157         Arjana Ishmi         Shkoděr         PSD           158         Arjen Gjiriti         Korčě         BD           159         Arjeta Kasmi         Durrěs         ADR           160         Arlind Mesi         Shkoděr         NTH           161         Arlinda Bezhani         Berat         PLDSH           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Vogli         Elbasan         ADR           164         Arlindo Vogli         Elbasan         ADR           165         Armand Korça         Durrěs         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armadi Narta         Elbasan         ABEOK           168         Armir Nezha         Fier         ADR           168         Armir Nezha         Fier         ADR           169         Arqile Janku         Vlorě         ABEOK           170         Arsen Belaj         Vlorě         BD           171         Arsen Belaj         Vlorě         BD           171         Arsen Belaj         Vlorě<	154	Arjan Avdolli	Korçë	ABEOK
157         Arjana Ishmi         Shkodër         PSD           158         Arjen Gjiriti         Korçë         BD           159         Arjeta Kasmi         Durëš         ADR           160         Arlind Mesi         Shkodër         NTH           161         Arlinda Bezhani         Berat         PLDSH           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Toro         Tiranë         PBK           164         Arlindo Vogli         Elbasan         ADR           165         Armand Korça         Durrës         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armela Murataj         Fier         ADR           168         Armir Nezha         Fier         PBK           169         Argile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ADR           171         Arsen Geci         Shkodër         ADR           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër<	155	Arjan Hoxha	Tiranë	ABEOK
158         Arjen Gjiriti         Korçë         BD           159         Arjeta Kasmi         Durrës         ADR           160         Arlind Mesi         Shkodër         NTH           161         Arlind Kasëmi         Vlorë         BD           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Toro         Tiranë         PBK           164         Arlindo Vogli         Elbasan         ADR           165         Armandi Korça         Durrës         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armadi Narta         Elbasan         ABEOK           167         Armandi Narta         Elbasan         ABEOK           167         Armandi Narta         Elbasan         ABEOK           168         Armandi Narta         Elbasan         ABEOK           167         Armandi Narta         Elbasan         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi	156	Arjan Kullolli	Tiranë	ADR
159         Arjeta Kasmi         Durrës         ADR           160         Arlind Mesi         Shkodër         NTH           161         Arlind Kasëmi         Vlorë         BD           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Vogli         Elbasan         ADR           164         Arlindo Vogli         Elbasan         ADR           165         Armandi Narta         Elbasan         ABEOK           166         Armandi Narta         Elbasan         ABEOK           167         Armada Murataj         Fier         ADR           168         Armir Nezha         Fier         PBK           169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           171         Arsen Belaj         Vlorë         ADR           171         Arsen Belaj         Vlorë         ADR           171         Arsen Belaj         Vlorë         ADR           172         Arsen Belaj         Nlorë         ADR           173         Arta Palushi         Shkodër	157	Arjana Ishmi	Shkodër	PSD
160         Arlind Mesi         Shkodër         NTH           161         Arlinda Kasëmi         Vlorë         BD           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Toro         Tiranë         PBK           164         Arlindo Vogli         Elbasan         ABEOK           165         Armandi Korça         Durrës         PLDSH           166         Armandi Korça         Durrës         PLDSH           166         Armandi Korça         Durrës         PLDSH           166         Armandi Korça         Durrës         PLDSH           167         Armandi Korça         Durrës         PLDSH           168         Armandi Korça         Durrës         PBK           169         Argile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Geci         Shkodër         ADR           171         Arsen Geci         Shkodër         ADR           172         Artan Gjinali         Tiranë         ADR           175         Artan Hatellari		Arjen Gjiriti	Korçë	BD
161         Arlind Kasémi         Vlorè         BD           162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Toro         Tiranê         PBK           164         Arlindo Vogli         Elbasan         ADR           165         Armandi Korça         Durrês         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armandi Narta         Elbasan         ABEOK           168         Armir Nezha         Fier         PBK           169         Arqile Janku         Vlorê         ABEOK           170         Arsen Belaj         Vlorê         BD           171         Arsen Belaj         Vlorê         BD           171         Arsen Thikaxhija         Shkodêr         PBK           172         Arsen Geci         Shkodêr         ADR           173         Arta Palushi         Shkodêr         ADR           173         Arta Palushi         Tiranê         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Hatellari         Berat         PLDSH           177         Artem Balushi	159	<u> </u>		
162         Arlinda Bezhani         Berat         PLDSH           163         Arlindo Toro         Tiranë         PBK           164         Arlindo Vogli         Elbasan         ADR           165         Armandi Korça         Durrës         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armela Murataj         Fier         ADR           168         Armir Nezha         Fier         ADR           168         Armir Nezha         Fier         ADR           168         Armir Nezha         Fier         ADR           169         Arqiel Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         BD           171         Arsen Belaj         Vlorë         BD           171         Arsen Belaj         Vlorë         ADR           172         Arsen Geci         Shkodër         ADR           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         ADR           174         Artan Gjinali         Tiranë         PLDSH           175         Artan Hatellari         Berat			Shkodër	NTH
163         Arlindo Toro         Tiranë         PBK           164         Arlindo Vogli         Elbasan         ADR           165         Armand Korça         Durrës         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armela Murataj         Fier         ADR           168         Armir Nezha         Fier         PBK           169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         BD           171         Arsen Belaj         Vlorë         BD           171         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         ADR           173         Arta Palushi         Shkodër         ADR           174         Arta Shari         Lezhë         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Hatellari         Berat         PLDSH           177         Artemis Malo         Gjirokastër         PS           178         Artenis Gjinali         Fi				
164         Arlindo Vogli         Elbasan         ADR           165         Armand Korça         Durrës         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armela Murataj         Fier         ADR           168         Armir Nezha         Fier         ADR           169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Geci         Shkodër         ADR           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         ADR           174         Arta Xhari         Lezhë         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Hatellari         Berat         PLDSH           177         Artemis Malo         Gjirokastër         PS           178         Artan Gjinali         Tiranë         ADR           179         Artiol Kanani <td< td=""><td></td><td></td><td></td><td></td></td<>				
165         Armand Korça         Durrës         PLDSH           166         Armandi Narta         Elbasan         ABEOK           167         Armela Murataj         Fier         ADR           168         Armir Nezha         Fier         ADR           169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           171         Arsen Geci         Shkodër         ADR           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         ADR           174         Arta Xhari         Lezhë         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Hatellari         Berat         PLDSH           177         Artemis Malo         Gjirokastër         PS           178         Artan Gjinali         Tiranë         ADR           179         Artiol Kanani         S				
166         Armandi Narta         Elbasan         ABEOK           167         Armela Murataj         Fier         ADR           168         Armir Nezha         Fier         PBK           169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         ABEOK           171         Arsen Belaj         Vlorë         ABEOK           171         Arsen Geci         Shkodër         ADR           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         LRE           174         Arta Xhari         Lezhë         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Gjinali         Tiranë         ABEOK           177         Artemis Malo         Gjirokastër         PS           178         Artenis Duka         Fier         BD           179         Artiol Kanani         Shkodër         ADR           180         Artjola Dervishaj         Du				
167         Armela Murataj         Fier         ADR           168         Armir Nezha         Fier         PBK           169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         BD           171         Arsen Belaj         Vlorë         BD           172         Arsen Belaj         Vlorë         BD           172         Arsen Belaj         Vlorë         BD           173         Arta Palushi         Shkodër         ADR           174         Arta Narii         Lezhë         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Gjinali         Tiranë         PLDSH           177         Artemis Malo         Gjirokastër         PS           178         Artenis Duka         Fier         BD           179         Artiol Kanani         Shkodër         ADR				
168         Armir Nezha         Fier         PBK           169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         BD           171         Arsen Belaj         Vlorë         BD           171         Arsen Belaj         Vlorë         BD           171         Arsen Belaj         Vlorë         BD           172         Arsen Belaj         Vlorë         BD           173         Artan Belai         Shkodër         ADR           174         Arta Athari         Lezhë         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Gjinali         Tiranë         ABEOK           177         Artemis Malo         Gjirokastër         PS           178         Artenis Duka         Fier         BD           179         Artiol Kanani         Shkodër         ADR           180         Artjola Dervishaj         Durrës         PSD           181         Artjola Dervishaj         Durrës         PDDH           180         Artur Roshi         Tiranë         PD-PD/AN           181         Artur Roshi         Durrës <td></td> <td></td> <td></td> <td></td>				
169         Arqile Janku         Vlorë         ABEOK           170         Arsen Belaj         Vlorë         BD           171         Arsen Thikaxhija         Shkodër         PBK           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         LRE           174         Artan Hatellari         Berat         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Hatellari         Berat         PLDSH           176         Artan Malo         Gjirokastër         PS           177         Artemis Duka         Fier         BD           177         Artemis Duka         Fier         BD           177         Artemis Duka         Fier         BD           178         Artiol Kastrati         Durrës         PLDSH           180         Artur Roshi         T		-		
170         Arsen Belaj         Vlorë         BD           171         Arsen Thikaxhija         Shkodër         PBK           172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         LRE           174         Arta Palushi         Shkodër         LRE           174         Arta Palushi         Shkodër         LRE           174         Arta Palushi         Shkodër         LRE           175         Artan Hatellari         Berat         PLDSH           176         Artan Gjinali         Tiranë         ABEOK           177         Artemis Malo         Gjirokastër         PS           178         Artemis Malo         Gjirokastër         PS           179         Artiol Kanani         Shkodër         ADR           180         Artjola Dervishaj         Durrës         PSD           181         Artjola Kastrati         Durrës         PSD           181         Artjola Kastrati         Durrës         PDD M           182         Artur Roshi         Tiranë         PD-PD / AN           183         Artur Velaj         Durrës         PLDSH           184         Art				
171 Arsen Thikaxhija Shkodër PBK 172 Arsen Geci Shkodër ADR 173 Arta Palushi Shkodër LRE 174 Arta Xhari Lezhë PLDSH 175 Artan Hatellari Berat PLDSH 176 Artan Gjinali Tiranë ABEOK 177 Artemis Malo Gjirokastër PS 178 Artanis Duka Fier BD 179 Artiol Kanani Shkodër ADR 180 Artjola Dervishaj Durrës PLDSH 181 Artjola Kastrati Durrës PLDSH 182 Artur Roshi Tiranë PD-PD / AN 183 Artur Velaj Durrës PSD 184 Artur Dedja Durrës PSD 185 Artur Hadaj Gjirokastër PLDSH 186 Artur Hadaj Gjirokastër PLDSH 187 Artur Merdani Lezhë ABEOK 188 Artur Ndreca Lezhë ABEOK 189 Arturi Hoxha Korçë ADR 190 Arzije Hysa Tiranë PLDSH 191 Astrit Shkëmbi Elbasan PBK 194 Atird Hoxha Vlorë PD-PD / AN 195 Aurel Cela Elbasan PBK 198 Aurel Kopeci Gjirokastër ADR 199 Aurel Hoxha Tiranë PLDSH 190 Avalel Cela Elbasan PBK 191 Astrit Shkëmbi Elbasan PBK 192 Astrit Shkëmbi Shkodër ADR 193 Astrit Shkëmbi Shaan PBK 194 Atird Hoxha Vlorë PD-PD / AN 195 Aulona Kulluri Tiranë ADR 190 Avalel Cela Elbasan PBK 191 Astrit Shabani Shkodër BD 192 Bahri Shabani Shkodër BD 193 Bardhe Lisi Shkodër BD 194 Azem Haliti Vlorë NTH 195 Bashkim Fino Fier PS 196 Basri Elezi Kukës PBK 197 Belar Nuci Dibër BD 198 Belind Këlliçi Tiranë PD-PD / AN 199 Benard Palaj Lezhë PS				
172         Arsen Geci         Shkodër         ADR           173         Arta Palushi         Shkodër         LRE           174         Arta Palushi         Shkodër         LRE           174         Arta Palushi         Shkodër         LEZHË           175         Artan Hatellari         Berat         PLDSH           176         Artan Gjinali         Tiranë         ABEOK           177         Artemis Malo         Gjirokastër         PS           178         Artenis Duka         Fier         BD           179         Artiol Kanani         Shkodër         ADR           180         Artjola Dervishaj         Durrës         PSD           181         Artjola Kastrati         Durrës         PSD           181         Artjola Kastrati         Durrës         PSD           182         Artur Roshi         Tiranë         PD-PD/AN           183         Artur Velaj         Durrës         PSD           184         Artur Dedja         Durrës         PSD           185         Artur Prishtina         Durrës         PSD           186         Artur Hadaj         Gjirokastër         PLDSH           187         Artur Mer				
173         Arta Palushi         Shkodër         LRE           174         Arta Xhari         Lezhë         PLDSH           175         Artan Hatellari         Berat         PLDSH           176         Artan Gjinali         Tiranë         ABEOK           177         Artemis Malo         Gjirokastër         PS           178         Artenis Duka         Fier         BD           179         Artiol Kanani         Shkodër         ADR           180         Artjola Dervishaj         Durrës         PSD           181         Artjola Kastrati         Durrës         PLDSH           182         Artur Roshi         Tiranë         PD-PD / AN           183         Artur Velaj         Durrës         PSD           184         Artur Dedja         Durrës         PSD           185         Artur Prishtina         Durrës         PSD           186         Artur Hadaj         Gjirokastër         PLDSH           187         Artur Merdani         Lezhë         ABEOK           188         Artur Ndreca         Lezhë         ABEOK           189         Arturi Hoxha         Korçë         ADR           190         Arzije Hysa				
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184 Artur Dedja Durrës PSD 185 Artur Prishtina Durrës PLDSH 186 Artur Hadaj Gjirokastër PLDSH 187 Artur Merdani Lezhë ABEOK 188 Artur Ndreca Lezhë ABEOK 189 Arturi Hoxha Korçë ADR 190 Arzije Hysa Tiranë PLDSH 191 Astrit Patozi Tiranë BD 192 Astrit Gjinaj Durrës PSD 193 Astrit Shkëmbi Elbasan PBK 194 Atird Hoxha Vlorë PD-PD / AN 195 Aulona Kulluri Tiranë PLDSH 196 Aurel Larti Korçë BD 197 Aurel Çela Elbasan PBK 198 Aurel Kopeci Gjirokastër ADR 199 Aurel Hoxha Tiranë ADR 200 Avdi Meli Tiranë PBK 201 Azem Haliti Vlorë NTH 202 Bahri Shabani Shkodër BD 203 Bardhe Lisi Shkodër ABEOK 204 Bardhyl Harizi Fier ABEOK 205 Bashkim Fino Fier PS 206 Basri Elezi Kukës PBK 207 Behar Nuci Dibër BD 208 Belind Këlliçi Tiranë PD-PD / AN 209 Benard Palaj Lezhë PS				
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186       Artur Hadaj       Gjirokastër       PLDSH         187       Artur Merdani       Lezhë       ABEOK         188       Artur Ndreca       Lezhë       ABEOK         189       Arturi Hoxha       Korçë       ADR         190       Arzije Hysa       Tiranë       PLDSH         191       Astrit Patozi       Tiranë       BD         192       Astrit Gjinaj       Durrës       PSD         193       Astrit Shkëmbi       Elbasan       PBK         194       Atird Hoxha       Vlorë       PD-PD / AN         195       Aulona Kulluri       Tiranë       PLDSH         196       Aurel Larti       Korçë       BD         197       Aurel Çela       Elbasan       PBK         198       Aurel Kopeci       Gjirokastër       ADR         199       Aurel Hoxha       Tiranë       ADR         200       Avdi Meli       Tiranë       PBK         201       Azem Haliti       Vlorë       NTH         202       Bahri Shabani       Shkodër       ABEOK         203       Bardhe Lisi       Shkodër       ABEOK         204       Bardhyl Harizi       Fier       <		-		
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189 Arturi Hoxha Korçë ADR 190 Arzije Hysa Tiranë PLDSH 191 Astrit Patozi Tiranë BD 192 Astrit Gjinaj Durrës PSD 193 Astrit Shkëmbi Elbasan PBK 194 Atird Hoxha Vlorë PD-PD / AN 195 Aulona Kulluri Tiranë PLDSH 196 Aurel Larti Korçë BD 197 Aurel Çela Elbasan PBK 198 Aurel Kopeci Gjirokastër ADR 199 Aurel Hoxha Tiranë ADR 200 Avdi Meli Tiranë PBK 201 Azem Haliti Vlorë NTH 202 Bahri Shabani Shkodër BD 203 Bardhe Lisi Shkodër ABEOK 204 Bardhyl Harizi Fier ABEOK 205 Bashkim Fino Fier PS 206 Basri Elezi Kukës PBK 207 Behar Nuci Dibër BD 208 Belind Këlliçi Tiranë PD-PD / AN 209 Benard Palaj Lezhë PS				
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198         Aurel Kopeci         Gjirokastër         ADR           199         Aurel Hoxha         Tiranë         ADR           200         Avdi Meli         Tiranë         PBK           201         Azem Haliti         Vlorë         NTH           202         Bahri Shabani         Shkodër         BD           203         Bardhe Lisi         Shkodër         ABEOK           204         Bardhyl Harizi         Fier         ABEOK           205         Bashkim Fino         Fier         PS           206         Basri Elezi         Kukës         PBK           207         Behar Nuci         Dibër         BD           208         Belind Këlliçi         Tiranë         PD-PD / AN           209         Benard Palaj         Lezhë         PS				
199 Aurel Hoxha Tiranë ADR 200 Avdi Meli Tiranë PBK 201 Azem Haliti Vlorë NTH 202 Bahri Shabani Shkodër BD 203 Bardhe Lisi Shkodër ABEOK 204 Bardhyl Harizi Fier ABEOK 205 Bashkim Fino Fier PS 206 Basri Elezi Kukës PBK 207 Behar Nuci Dibër BD 208 Belind Këlliçi Tiranë PD-PD / AN 209 Benard Palaj Lezhë PS				
200Avdi MeliTiranëPBK201Azem HalitiVlorëNTH202Bahri ShabaniShkodërBD203Bardhe LisiShkodërABEOK204Bardhyl HariziFierABEOK205Bashkim FinoFierPS206Basri EleziKukësPBK207Behar NuciDibërBD208Belind KëlliçiTiranëPD-PD / AN209Benard PalajLezhëPS		·	-	
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206         Basri Elezi         Kukës         PBK           207         Behar Nuci         Dibër         BD           208         Belind Këlliçi         Tiranë         PD-PD / AN           209         Benard Palaj         Lezhë         PS		-		
208 Belind Këlliçi Tiranë PD-PD/AN 209 Benard Palaj Lezhë PS	206	Basri Elezi	Kukës	PBK
208 Belind Këlliçi Tiranë PD-PD/AN 209 Benard Palaj Lezhë PS	207	Behar Nuci	Dibër	BD
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210 Benard Martini Tiranë PSD	209	Benard Palaj	Lezhë	PS
	210	Benard Martini	Tiranë	PSD

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### **FINAL OBSERVATION REPORT**

SEPTEMBER 2020 - JANUARY 2022



No         Name Surname         District         Subject           211         Beqir Agolli         Tiranë         ABEOK           212         Bere Veseli         Dibër         PSD           213         Bernard Lejthija         Shkodër         ABEOK           214         Berton Xhimanka         Tiranë         ADR           215         Besara Ganjolla         Shkodër         NTH           216         Besard Myrtaj         Vlorë         NTH           217         Besard Meta         Tiranë         PSD           218         Besjana Ramaj         Fier         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodër         NTH           219         Besmir Sadiku         Shkodër         PSD           220         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           222         Besmir Stojku         Elbasan         NTH           222         Bestia Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PSD           226         Bino Abazaj <th></th> <th></th> <th></th> <th></th>				
212         Bere Veseli         Dibër         PSD           213         Bernard Lejthija         Shkodër         ABEOK           214         Berton Xhimanka         Tiranë         ADR           215         Besara Ganjolla         Shkodër         NTH           216         Besard Myrtaj         Vlorë         NTH           217         Besard Meta         Tiranë         PSD           218         Besjana Ramaj         Fier         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodër         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           222         Besmir Stojku         Elbasan         NTH           222         Besmir Stojku         Elbasan         NTH           222         Beldar Mulla         Vlorë         NTH           225         Bilbil Dervishi         Shkodër         PSD           229         Bledar Burgji	No	Name Surname	District	Subject
212         Bere Veseli         Dibër         PSD           213         Bernard Lejthija         Shkodër         ABEOK           214         Berton Xhimanka         Tiranë         ADR           215         Besara Ganjolla         Shkodër         NTH           216         Besard Meta         Tiranë         PSD           217         Besart Meta         Tiranë         PSD           218         Besjana Lushaj         Fier         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodër         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodër         PSD           220         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           222         Besmir Stojku         Elbasan         ADR           224         Betisa Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PSD           226         Bino Abazaj         Tiranë         NTH           227         Bledar Burgji	211	Rogir Agolli	Tiranö	AREOK
213         Bernard Lejthija         Shkodër         ABEOK           214         Berton Xhimanka         Tiranë         ADR           215         Besara Ganjolla         Shkodër         NTH           216         Besard Myrtaj         Vlorë         NTH           217         Besard Meta         Tiranë         PSD           218         Besjana Ramaj         Fier         NTH           219         Besjana Lushaj         Fier         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodër         NTH           221         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           222         Besnik Hamitaj         Fier         PLDSH           223         Betime Zymeri         Shkodër         PBK           224         Betisa Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PBK           224         Betisa Myftari         Tiranë         NTH           225         Biledar Mulla         Vlorë         NTH           226         Bino Abazaj				
214         Berton Xhimanka         Tiranë         ADR           215         Besara Ganjolla         Shkodër         NTH           216         Besard Myrtaj         Vlorë         NTH           217         Besart Meta         Tiranë         PSD           218         Besjana Ramaj         Fier         NTH           219         Bespana Lushaj         Fier         NTH           220         Besmir Sadiku         Shkodër         NTH           221         Besmir Stojku         Elbasan         ADR           221         Besmik Hamitaj         Fier         PLDSH           223         Betisa Myftari         Tiranë         NTH           224         Betisa Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PBK           224         Betisa Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PBK           224         Betisa Myftari         Tiranë         NTH           225         Bilbalar Willa         Vlorë         NTH           226         Biloha Falza         Vlorë         PSD           229         Bledar Burgjia				
216         Besard Myrtaj         Vlorë         NTH           217         Besart Meta         Tiranë         PSD           218         Besjana Ramaj         Fier         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           222         Besnik Hamitaj         Fier         PLDSH           223         Betime Zymeri         Shkodër         PBK           224         Betisa Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PSD           226         Bino Abazaj         Tiranë         NTH           227         Bledar Mulla         Vlorë         NTH           228         Bledar Burgjia         Vlorë         PSD           230         Bledar Burgjia         Vlorë         BD           230         Bledar Burgjia         Vlorë         ADR           231         Bledar Tusha         Elbasan         ADR           233         Bledar Paloka         Lezhë         ADR           234         Bleona Sadikllari <td< td=""><td>214</td><td></td><td>Tiranë</td><td></td></td<>	214		Tiranë	
217         Besart Meta         Tiranê         PSD           218         Besjana Ramaj         Fier         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodêr         NTH           221         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           221         Besmir Stojku         Elbasan         ADR           222         Besnik Hamitaj         Fier         PLDSH           223         Betime Zymeri         Shkodêr         PSD           224         Betisa Myftari         Tiranê         NTH           225         Bilbil Dervishi         Shkodêr         PSD           226         Bino Abazaj         Tiranê         NTH           227         Bledar Mulla         Vlorê         NTH           228         Bledar Mulla         Vlorê         PSD           229         Bledar Burgjia         Vlorê         BD           230         Bledar Pulçani         Durrês         ADR           231         Bledar Paloka         Lezhê         ADR           233         Bledar Paloka         L	215	Besara Ganjolla	Shkodër	NTH
218         Besjana Ramaj         Fier         NTH           219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodër         NTH           221         Besmir Stojku         Elbasan         ADR           222         Besnik Hamitaj         Fier         PLDSH           223         Betime Zymeri         Shkodër         PBK           224         Betisa Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PSD           226         Bino Abazaj         Tiranë         NTH           227         Bledar Mulla         Vlorë         PSD           228         Bledar Mulla         Vlorë         PD           230         Bledar Burgjia         Vlorë         BD           230         Bledar Burgjia         Vlorë         BD           230         Bledar Burgjia         Vlorë         ADR           231         Bledar Paloka         Lezhë         ADR           233         Bledar Paloka         Lezhë         ADR           234         Bleona Sadikllari         Durrës         PBK           235         Bleona Simoni         L	216	Besard Myrtaj	Vlorë	NTH
219         Besjana Lushaj         Fier         PSD           220         Besmir Sadiku         Shkodër         NTH           221         Besmir Stojku         Elbasan         ADR           222         Besnik Hamitaj         Fier         PLDSH           223         Betime Zymeri         Shkodër         PBK           224         Betisa Myftari         Tiranë         NTH           225         Bilbil Dervishi         Shkodër         PSD           226         Bino Abazaj         Tiranë         NTH           227         Bledar Mulla         Vlorë         NTH           228         Bledar Khaferi         Korçë         PSD           230         Bledar Burgjia         Vlorë         BD           230         Bledar Burgjia         Vlorë         BD           230         Bledar Paloka         Lezhë         ADR           231         Bledar Bregasi         Korçë         ADR           233         Bledar Paloka         Lezhë         ADR           234         Bleona Sadikllari         Durrës         PBK           235         Bleona Sadikllari         Durrës         PBK           237         Blerina Reçi	217	Besart Meta	Tiranë	PSD
220Besmir SadikuShkodërNTH221Besmir StojkuElbasanADR222Besnik HamitajFierPLDSH223Betime ZymeriShkodërPBK224Betisa MyftariTiranëNTH225Bilbil DervishiShkodërPSD226Bino AbazajTiranëNTH227Bledar MullaVlorëNTH228Bledar MullaVlorëPSD229Bledar BurgjiaVlorëBD230Bledar BurgjiaVlorëBD231Bledar TushaElbasanADR231Bledar BregasiKorçëADR233Bledar BregasiKorçëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD / AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Brigan BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena ZeneliKorçëBD <td< td=""><td>218</td><td>Besjana Ramaj</td><td>Fier</td><td>NTH</td></td<>	218	Besjana Ramaj	Fier	NTH
221Besmir StojkuElbasanADR222Besnik HamitajFierPLDSH223Betime ZymeriShkodërPBK224Betisa MyftariTiranëNTH225Bilbil DervishiShkodërPSD226Bino AbazajTiranëNTH227Bledar MullaVlorëNTH228Bledar MullaVlorëNTH229Bledar BurgjiaVlorëBD230Bledar BurgjiaVlorëBD231Bledar TushaElbasanADR231Bledar BregasiKorçëADR233Bledar PalokaLezhëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD / AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH <td< td=""><td>219</td><td>Besjana Lushaj</td><td>Fier</td><td>PSD</td></td<>	219	Besjana Lushaj	Fier	PSD
222Besnik HamitajFierPLDSH223Betime ZymeriShkodërPBK224Betisa MyftariTiranëNTH225Bilbil DervishiShkodërPSD226Bino AbazajTiranëNTH227Bledar MullaVlorëNTH228Bledar MullaVlorëNTH229Bledar BurgjiaVlorëBD230Bledar BurgjiaVlorëBD231Bledar TushaElbasanADR231Bledar BregasiKorçëADR233Bledar PalokaLezhëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD/AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPD-PD/AN	220	Besmir Sadiku	Shkodër	NTH
223Betime ZymeriShkodërPBK224Betisa MyftariTiranëNTH225Bilbil DervishiShkodërPSD226Bino AbazajTiranëNTH227Bledar MullaVlorëNTH228Bledar MullaVlorëNTH229Bledar BurgjiaVlorëBD230Bledar BurgjiaVlorëBD231Bledar TushaElbasanADR231Bledar BregasiKorçëADR233Bledar BregasiKorçëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD/AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPD-PD/AN252Bujar RekaGjirokastërABEOK	221	Besmir Stojku	Elbasan	ADR
224Betisa MyftariTiranëNTH225Bilbil DervishiShkodërPSD226Bino AbazajTiranëNTH227Bledar MullaVlorëNTH228Bledar MullaVlorëNTH228Bledar MullaVlorëPSD229Bledar BurgjiaVlorëBD230Bledar BurgjiaVlorëBD231Bledar BregasiKorçëADR232Bledar BregasiKorçëADR233Bledar PalokaLezhëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD/AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPBF252Bujar LeskajVlorëPD-PD/AN253	222	Besnik Hamitaj	Fier	PLDSH
225Bilbil DervishiShkodërPSD226Bino AbazajTiranëNTH227Bledar MullaVlorëNTH228Bledar MullaVlorëNTH228Bledar MullaVlorëPSD229Bledar BurgjiaVlorëBD230Bledar BurgjiaVlorëBD231Bledar TushaElbasanADR232Bledar BregasiKorçëADR233Bledar PalokaLezhëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD / AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD249Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPBK252Bujar RekaGjirokastërABEOK2	223	Betime Zymeri	Shkodër	PBK
226Bino AbazajTiraněNTH227Bledar MullaVlorěNTH228Bledar MullaVlorěNTH229Bledar SurgjiaVlorěBD230Bledar BurgjiaVlorěBD231Bledar TushaElbasanADR232Bledar BregasiKorçêADR233Bledar BregasiKorçêADR234Bleona GorriFierABEOK235Bleona SadikllariDurrêsPBK236Bleona SimoniLezhěPBK237Blerina ReçiDurrêsPD-PD / AN238Blerina HizmoVlorěBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD249Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPD-PD / AN253Bujar HoxhajBeratPD-PD / AN254Bujar RekaGjirokastërABEOK255Bukuri SakolliTiranëPBK<	224	Betisa Myftari	Tiranë	NTH
Bledar Mulla Vlorē NTH  228 Bledar Xhaferi Korçē PSD  229 Bledar Burgjia Vlorē BD  230 Bledar Velçani Durrēs ADR  231 Bledar Tusha Elbasan ADR  232 Bledar Bregasi Korçē ADR  233 Bledar Paloka Lezhē ADR  234 Bleona Qorri Fier ABEOK  235 Bleona Sadikllari Durrēs PBK  236 Bleona Simoni Lezhē PBK  237 Blerina Reçi Durrēs PD-PD / AN  238 Blerina Hizmo Vlorē BD  239 Boran Dogu Vlorē PSD  240 Borana Tartari Tiranē NTH  241 Boriana Durmishi Fier NTH  242 Boris Shakaj Tiranē NTH  243 Bosian Lamaj Tiranē PSD  244 Boy King Hoxha Vlorē ADR  245 Briana Bino Durrēs BD  246 Brigen Sinanaj Fier PLDSH  247 Brigjilda Simoni Lezhē PBK  248 Brikena Goxheri Dibēr BD  250 Brunilda Dhrami Tiranē NTH  251 Bruno Xhaferaj Vlorē PBK  252 Bujar Leskaj Vlorē PD-PD / AN  253 Bujar Hoxhaj Berat PD-PD / AN  254 Bujar Reka Gjirokastēr ABEOK  255 Bukuri Sakolli Tiranē PBK  256 Çlirim Gjata Tiranē PBK  257 Cyme Lulaj Tiranē PBK  258 Daniel Elezi Tiranē PBK  250 Daniel Alcani Fier BD  261 Daniel Haxhiu Fier BBC	225	Bilbil Dervishi	Shkodër	PSD
228Bledar XhaferiKorçëPSD229Bledar BurgjiaVlorëBD230Bledar VelçaniDurrësADR231Bledar TushaElbasanADR232Bledar BregasiKorçëADR233Bledar PalokaLezhëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD / AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD249Brikena ZeneliKorçëBD250Brunida DhramiTiranëNTH251Bruno XhaferajVlorëPBK252Bujar LeskajVlorëPD-PD / AN253Bujar HoxhajBeratPD-PD / AN254Bujar RekaGjirokastërABEOK255Bukuri SakolliTiranëPBK256Çlirim GjataTiranëPBK <td>226</td> <td>Bino Abazaj</td> <td>Tiranë</td> <td>NTH</td>	226	Bino Abazaj	Tiranë	NTH
Bledar Burgjia Vlorë BD Bledar Velçani Durrës ADR Bledar Tusha Elbasan ADR Bledar Tusha Elbasan ADR Bledar Bregasi Korçë ADR Bledar Paloka Lezhë ADR Bleona Qorri Fier ABEOK Bleona Sadikllari Durrës PBK Bleona Simoni Lezhë PBR Bleona Blerina Reçi Durrës PD-PD / AN Boriana Durmishi Fier NTH Boriana Durmishi Fier NTH Boriana Bino Durrës BD Brigen Sinanaj Fier PLDSH Brikena Goxheri Dibër BD Bruno Xhaferaj Vlorë PBK Bujar Reka Gjirokastër ABEOK Burla Reka Burla Reci Durrës PSD Brikena Goxheri Dibër BD Brikena Zeneli Korçë BD Brikena Goxheri Dibër BD BR Brikena Goxheri Dibër BD BR BR Brikena Goxheri Dibër BD BR BR Brikena Goxheri Dibër BD BR Brikena Goxheri Dibër BD BR	227	Bledar Mulla	Vlorë	NTH
230 Bledar Velçani Durrès ADR 231 Bledar Tusha Elbasan ADR 232 Bledar Bregasi Korçë ADR 233 Bledar Paloka Lezhë ADR 234 Bleona Qorri Fier ABEOK 235 Bleona Sadikllari Durrès PBK 236 Bleona Simoni Lezhë PBK 237 Blerina Reçi Durrès PD-PD / AN 238 Blerina Hizmo Vlorë BD 239 Boran Dogu Vlorë PSD 240 Borana Tartari Tiranë NTH 241 Boriana Durmishi Fier NTH 242 Boris Shakaj Tiranë NTH 243 Bosian Lamaj Tiranë PSD 244 Boy King Hoxha Vlorë BD 245 Briana Bino Durrès BD 246 Brigen Sinanaj Fier PLDSH 247 Brigjilda Simoni Lezhë PBK 248 Brikena Goxheri Dibër BD 250 Brunilda Dhrami Tiranë NTH 251 Bruno Xhaferaj Vlorë PBK 252 Bujar Leskaj Vlorë PBK 253 Bujar Hoxhaj Berat PD-PD / AN 254 Bujar Reka Gjirokastër ABEOK 255 Bukuri Sakolli Tiranë PBK 256 Çlirim Gjata Tiranë PBK 257 Cyme Lulaj Tiranë PBK 258 Daniel Kordhoni Tiranë NTH 259 Daniel Elezi Tiranë PBK 260 Daniel Alcani Fier BD 261 Daniel Haxhiu Fier PBK 262 Danjel Çoku Lezhë NTH	228	Bledar Xhaferi	Korçë	PSD
231Bledar TushaElbasanADR232Bledar BregasiKorçëADR233Bledar PalokaLezhëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD / AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD249Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPBK252Bujar LeskajVlorëPD-PD / AN253Bujar HoxhajBeratPD-PD / AN254Bujar RekaGjirokastërABEOK255Bukuri SakolliTiranëPBK256Çlirim GjataTiranëPBK257Cyme LulajTiranëPD-PD / AN258Daniel KordhoniTiranëPLDSH259Daniel AlcaniFier <td< td=""><td>229</td><td>Bledar Burgjia</td><td>Vlorë</td><td>BD</td></td<>	229	Bledar Burgjia	Vlorë	BD
232Bledar BregasiKorçëADR233Bledar PalokaLezhëADR234Bleona QorriFierABEOK235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD / AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Brigen SinanajFierPLDSH247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD249Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPBK252Bujar LeskajVlorëPBK253Bujar HoxhajBeratPD-PD / AN254Bujar RekaGjirokastërABEOK255Bukuri SakolliTiranëPBK256Çlirim GjataTiranëPBK257Cyme LulajTiranëPD-PD / AN258Daniel KordhoniTiranëPLDSH260Daniel AlcaniFierBD261Daniel HaxhiuFierPBK<	230	Bledar Velçani	Durrës	ADR
233 Bledar Paloka Lezhë ADR 234 Bleona Qorri Fier ABEOK 235 Bleona Sadikllari Durrës PBK 236 Bleona Simoni Lezhë PBK 237 Blerina Reçi Durrës PD-PD / AN 238 Blerina Hizmo Vlorë BD 239 Boran Dogu Vlorë PSD 240 Borana Tartari Tiranë NTH 241 Boriana Durmishi Fier NTH 242 Boris Shakaj Tiranë NTH 243 Bosian Lamaj Tiranë PSD 244 Boy King Hoxha Vlorë ADR 245 Briana Bino Durrës BD 246 Brigen Sinanaj Fier PLDSH 247 Brigjilda Simoni Lezhë PBK 248 Brikena Goxheri Dibër BD 250 Brunilda Dhrami Tiranë NTH 251 Bruno Xhaferaj Vlorë PBK 252 Bujar Leskaj Vlorë PBK 253 Bujar Hoxhaj Berat PD-PD / AN 254 Bujar Reka Gjirokastër ABEOK 255 Bukuri Sakolli Tiranë PBK 256 Çlirim Gjata Tiranë PBK 257 Cyme Lulaj Tiranë PBK 258 Daniel Kordhoni Tiranë NTH 259 Daniel Elezi Tiranë PLDSH 260 Daniel Alcani Fier BD 261 Daniel Coku Lezhë NTH	231	Bledar Tusha	Elbasan	ADR
Bleona Qorri Fier ABEOK Bleona Sadikllari Durrës PBK Bleona Simoni Lezhë PBK Bleona Simoni Lezhë PBK Blerina Reçi Durrës PD-PD / AN Blerina Hizmo Vlorë BD Boran Dogu Vlorë PSD Boran Dogu Vlorë PSD Boran Boriana Durmishi Fier NTH Boriana Durmishi Fier NTH Boriana Durmishi Fier NTH Boriana Bino Durrës BD Briana Bino Durrës BD Briana Bino Durrës BD Briana Bino Durrës BD Brispilda Simoni Lezhë PBK Brikena Goxheri Dibër BD Brikena Zeneli Korçë BD Brunilda Dhrami Tiranë NTH Brigjilda Simoni Lezhë PBK Briana Bino Brier PLDSH Brispilda Simoni Lezhë PBK Brikena Zeneli Korçë BD Brunilda Dhrami Tiranë NTH Brighilda Dhrami Tiranë NTH Brighilda Simoni Berat PD-PD / AN Brispilda Simoni Berat PD-PD / AN Brispilda Simoni Berat PD-PD / AN Brispilda Dhrami Tiranë NTH Dibër BD Brunilda Dhrami Tiranë NTH Dibër BBK Brikena Ceneli Korçë BB BBC Brikena Zeneli Korçë BBD Brikena Zeneli Tiranë NTH Dibër BBK Brikena Ceneli Tiranë PBK Brikena Celirim Gjata Tiranë PLDSH Brikena Celirim Brier BD Brikena Celirim BD			Korçë	
235Bleona SadikllariDurrësPBK236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD / AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Briggilda SimoniLezhëPBK247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD249Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPBK252Bujar LeskajVlorëPD-PD / AN253Bujar HoxhajBeratPD-PD / AN254Bujar RekaGjirokastërABEOK255Bukuri SakolliTiranëPBK256Çlirim GjataTiranëPBK257Cyme LulajTiranëPBK258Daniel KordhoniTiranëPLDSH260Daniel AlcaniFierBD261Daniel HaxhiuFierPBK262Danjel ÇokuLezhëNTH				ADR
236Bleona SimoniLezhëPBK237Blerina ReçiDurrësPD-PD/AN238Blerina HizmoVlorëBD239Boran DoguVlorëPSD240Borana TartariTiranëNTH241Boriana DurmishiFierNTH242Boris ShakajTiranëNTH243Bosian LamajTiranëPSD244Boy King HoxhaVlorëADR245Briana BinoDurrësBD246Briggilda SimoniLezhëPBK247Brigjilda SimoniLezhëPBK248Brikena GoxheriDibërBD249Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPBK252Bujar LeskajVlorëPD-PD/AN253Bujar HoxhajBeratPD-PD/AN254Bujar RekaGjirokastërABEOK255Bukuri SakolliTiranëPBK256Çlirim GjataTiranëPBK257Cyme LulajTiranëPBK258Daniel KordhoniTiranëPLDSH260Daniel AlcaniFierBD261Daniel HaxhiuFierPBK262Danjel ÇokuLezhëNTH				
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249Brikena ZeneliKorçëBD250Brunilda DhramiTiranëNTH251Bruno XhaferajVlorëPBK252Bujar LeskajVlorëPD-PD / AN253Bujar HoxhajBeratPD-PD / AN254Bujar RekaGjirokastërABEOK255Bukuri SakolliTiranëPBK256Çlirim GjataTiranëPD-PD / AN257Cyme LulajTiranëPBK258Daniel KordhoniTiranëNTH259Daniel EleziTiranëPLDSH260Daniel AlcaniFierBD261Daniel HaxhiuFierPBK262Danjel ÇokuLezhëNTH		- " - ' '		
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253 Bujar Hoxhaj Berat PD-PD / AN 254 Bujar Reka Gjirokastër ABEOK 255 Bukuri Sakolli Tiranë PBK 256 Çlirim Gjata Tiranë PD-PD / AN 257 Cyme Lulaj Tiranë PBK 258 Daniel Kordhoni Tiranë NTH 259 Daniel Elezi Tiranë PLDSH 260 Daniel Alcani Fier BD 261 Daniel Haxhiu Fier PBK 262 Danjel Çoku Lezhë NTH		-		
254 Bujar Reka Gjirokastër ABEOK 255 Bukuri Sakolli Tiranë PBK 256 Çlirim Gjata Tiranë PD-PD / AN 257 Cyme Lulaj Tiranë PBK 258 Daniel Kordhoni Tiranë NTH 259 Daniel Elezi Tiranë PLDSH 260 Daniel Alcani Fier BD 261 Daniel Haxhiu Fier PBK 262 Danjel Çoku Lezhë NTH				·
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259 Daniel Elezi Tiranë PLDSH 260 Daniel Alcani Fier BD 261 Daniel Haxhiu Fier PBK 262 Danjel Çoku Lezhë NTH	257	Cyme Lulaj	Tiranë	PBK
260Daniel AlcaniFierBD261Daniel HaxhiuFierPBK262Danjel ÇokuLezhëNTH	258	Daniel Kordhoni	Tiranë	NTH
261 Daniel Haxhiu Fier PBK 262 Danjel Çoku Lezhë NTH	259	Daniel Elezi	Tiranë	PLDSH
262 Danjel Çoku Lezhë NTH	260	Daniel Alcani	Fier	BD
	261	Daniel Haxhiu	Fier	PBK
263 Danjel Garunja Tiranë PSD	262	Danjel Çoku	Lezhë	NTH
	263		Tiranë	
264 Dashamir Shehi Tiranë PD-PD / AN				
265 Dashnor Laçi Tiranë ADR			Tiranë	
266 David Velaj Shkodër NTH		-		
267 Dea Çela Berat NTH				
268 Debora Piperi Korçë NTH		Dahara Dinari	I/orcö	N. ELL

No	Name Surname	District	Subject
269	Deis Ribaj	Vlorë	NTH
270	Demokrat Nela	Kukës	BD
271	Denata Toçe	Korçë	BD
272	Denis Deliu	Durrës	PS
273	Denis Dema	Tiranë	NTH
274	Denis Skura	Dibër	PSD
275	Denis Preçi	Tiranë	PSD
276	Denis Molla	Tiranë	BD
277	Denis Biçaku	Durrës	ABEOK
278	Denis Çakmashi	Tiranë	PBK
279	Denisa Maze	Vlorë	PSD
280	Denisa Mbrakulli	Berat	BD
281	Denisa Mançellari	Tiranë	PBK
282	Denisa Maletaj	Lezhë	ADR
283	Dëshire Agolli	Dibër	ABEOK
284	Devi Fing-ja	Tiranë	BD
285	Dhionis Musollari	Berat	PLDSH
286	Dhionis Kënini	Vlorë	ABEOK
287	Diamela Lamçe	Fier	PBK
288	Dikanjo Doda	Shkodër	PLDSH
289	Dilaver Kamberaj	Fier	PD-PD / AN
290	Dilaver Shala	Dibër	PBK
291	Dionis Jorgji	Korçë	NTH
292	Donika Tushaj	Lezhë	NTH
293	Dorela Kroni	Tiranë	NTH
294	Dorian Pali	Lezhë	NTH
295	Dorian Vukaj	Shkodër	PBK
295	Dorina Xhakollari	Gjirokastër	PLDSH
297	Dorjan Veseli	Dibër	PSD
298	Dorjan Hoxhaj	Lezhë	BD
299	Dorjan Demaj	Berat	ABEOK
300	Dorjana Petro	Korçë	PSD
300	-		ADR
302	Drilona Xhindi	Berat	
	Drita Marku Drita Duka	Durrës Vlorë	BD A REOK
303			ABEOK
304	Dritan Arapi	Tiranë	PSD
305	Dritan Troksi	Tiranë	PBK
306	Dritjola Karadaku	Korçë	PLDSH
307	Durim Çekrezi	Elbasan	PD-PD / AN
308	Dylaver Pepa	Elbasan	ABEOK
309	Edi Paloka	Durrës	PD-PD / AN
310	Edisa Zego	Elbasan	BD
311	Edison Hasanaj	Kukës	BD
312	Edlir Veizi	Korçë	ADR
313	Edlir Dado	Vlorë	ADR
314	Edlira Shëngjoni	Shkodër	PLDSH
315	Edlira Pelinku	Shkodër	PBK
316	Edmir Piroviq	Shkodër	PLDSH
317	Edmond Çata	Tiranë	PLDSH
318	Edmond Piroli	Lezhë	BD
319	Edmond Kapllani	Berat	PBK
320	Edmond Agolli	Tiranë	PBK
321	Edmond Berberi	Durrës	ADR
322	Edmond Ndoj	Lezhë	ADR
323	Edmond Stojku	Tiranë	ADR
324	Edmond Isaku	Dibër	PD-PD / AN
325	Eduard Kola	Tiranë	NTH
326	Eduard Gjoka	Shkodër	PSD



### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

SEPTEMBER 2020 – JANUARY 2022

**OBSERVATION** 

**FINAL** 

No	Name Surname	District	Subject
327	Eduart Laci	Tiranë	PBK
328	Eduart Ndocaj	Lezhë	ADR
329	Eglant Toromani	Tiranë	ADR
330	Eglantina Tafa	Berat	NTH
331	Egriselda Allushi	Durrës	NTH
332	Ejona Hima	Korçë	NTH
333	Ekaterina Zoto	Durrës	ADR
334	Elda Hoti	Lezhë	PD-PD / AN
335	Elda Bajraktari	Shkodër	PLDSH
336	Elda Pano	Durrës	BD
337	Eldio Preçi	Durrës	PSD
338	Eldis Arapi	Fier	NTH
339	Elena Skenderasi	Korçë	PSD
340	Elidjon Caco	Tiranë	PBK
341	Elio Shabani	Elbasan	NTH
342	Elis Elezi	Tiranë	NTH
343 344	Elis Rakipaj	Tiranë	PSD
344	Elisabeta Pepa Elizabeta Rredhi	Berat	BD BD (AN
345		Fier	PD-PD / AN PLDSH
346	Elizabeta Gjishti Elon Ciko	Berat Tiranë	BD
348	Elona Çapnage	Shkodër	NTH
349	Elona Marku	Dibër	PBK
350	Elsa Cengu	Tiranë	NTH
351	Elsa Voka	Berat	ABEOK
352	Elsa Biri	Durrës	ADR
353	Elsa Pajollari	Korçë	ADR
354	Elsaveta Begiraj	Vlorë	ABEOK
355	Elsina Gjindali	Vlorë	NTH
356	Eltmir Lala	Dibër	NTH
357	Elton Çanaj	Tiranë	NTH
358	Elton Laçi	Tiranë	BD
359	Elton Kullolli	Elbasan	ABEOK
360	Elton Buzani	Elbasan	PBK
361	Elvi Dragoj	Durrës	NTH
362	Elvira Abdulaj	Vlorë	PBK
363	Elvis Preçi	Lezhë	PLDSH
364	Elvis Dibra	Shkodër	PLDSH
365	Elvis Kondakçiu	Berat	BD
366	Emanuel Gjoka	Lezhë	PSD
367	Emanuela Roko	Tiranë	PLDSH
368	Emilja Koliqi	Shkodër	PD-PD / AN
369 370	Emiljana Alimadhi Emiljano Lata	Dibër Gjirokastër	PBK PBK
371	Emiljano Përndreka	Shkodër	ADR
372	Emirjan Perdoda	Shkodër	ADR
373	Endri Qahalliu	Berat	PLDSH
374	Endri Telhallari	Durrës	PBK
375	Endri Kaleshi	Tiranë	PBK
376	Endrit Shabani	Tiranë	NTH
377	Endrit Diçi	Tiranë	NTH
378	Endrit Bardhi	Gjirokastër	PBK
379	Endrit Koçiaj	Fier	ADR
380	Enea Alla	Elbasan	NTH
381	Enea Isufi	Berat	PSD
382	Enea Dengeri	Durrës	BD
383	Eneida Ruzhdije	Vlorë	PLDSH
384	Eneo Lika	Lezhë	ADR
385	Enerida Xhepollari	Durrës	PSD
386	Enerik Baçi	Korçë	PSD
387	Eni Madhi	Korçë	ADR
388	Enkeleda Latifi	Elbasan	ABEOK
389	Enkeleda Jemin	Tiranë	ADR
390	Enkeleida Shparthi	Fier	PLDSH

No	Name Surname	District	Subject
391	Enkelejd Alibeaj	Fier	PD-PD / AN
392	Enkelejda Sallaku	Tiranë	PD-PD / AN
393	Enriko Kaçaj	Vlorë	NTH
394	Enriko Ceko	Tiranë	ABEOK
395	Entela Muça	Elbasan	PSD
396	Enver Korro	Gjirokastër	NTH
397	Enver Peqini	Fier	BD
398 399	Enxhi Çiçaj Enxhi Çaushi	Vlorë Elbasan	PBK ADR
400	Era Buçpapaj	Kukës	NTH
401	Era Stojku	Dibër	ADR
402	Erald Jashari	Durrës	NTH
403	Erald Kordhoni	Tiranë	NTH
404	Erald Metaliu	Tiranë	PLDSH
405	Erald Latifi	Korçë	ABEOK
406	Eralda Bano(Tase)	Fier	PD-PD / AN
407	Eralda Murati	Tiranë	ABEOK
408	Eraldo Hatija	Fier	NTH
409	Erbi Ago	Tiranë	NTH
410	Erda Kurti	Durrës	PLDSH
411	Ergest Krakulli	Fier	PS
412	Ergis Sulo	Korçë Durrës	PBK PLDSH
414	Ergys Leba Ergys Musliu	Tiranë	ABEOK
415	Ergys Rroga	Fier	ADR
416	Eri Banushaj	Vlorë	PLDSH
417	Erida Zaçlli	Korçë	PLDSH
418	Eridjon Alimadhi	Berat	PBK
419	Erind Hoxha	Tiranë	PBK
420	Erinda Dane	Tiranë	NTH
421	Erinda Nela	Tiranë	ABEOK
422	Eriola Hoxha	Fier	PS
423	Eriola Toro	Fier	PBK
424	Erion Murataj	Elbasan	BD
425	Erion Barxhani	Shkodër	ADR
426 427	Erison Karamani Erjan Guxha	Berat Kukës	BD NTH
427	Erjola Nastu	Korçë	NTH
429	Erjon Dervishi	Tiranë	NTH
430	Erjon Gjoka	Durrës	BD
431	Erjon Toçi	Elbasan	BD
432	Erjon Gega	Elbasan	BD
433	Erjon Kaiku	Tiranë	BD
434	Erkin Qiraxhi	Durrës	BD
435	Erla Dervishi	Korçë	ADR
436	Ermal Muçaj	Elbasan	PSD
437	Ermal Bendo	Vlorë	ADR
438	Ermand Vrapi	Gjirokastër	PLDSH
439	Ermelinda Meçi	Lezhë	BD
440	Ermes Firaj	Korçë	PBK
441	Ermilda Gjini Ermira Giika	Gjirokastër Korçë	PSD PLDSH
442	Ermira Gjika Ermira Hupi	Dibër	BD
444	Ermira Hupi Ermira Hasa	Elbasan	ADR
444			
	Ernest Nikolli	Lezhë	PLDSH
446	Erold Buzo	Korçë	PLDSH
447	Ersa Dergjini	Shkodër	PBK
448	Ersen Bala	Shkodër	PSD
449	Ersi Sinani	Vlorë	ADR
450	Ersid Dobrovoda	Shkodër	NTH
451	Ertigel Bardho	Berat	PSD
452	Ervin Xhelo	Fier	PLDSH
453	Ervin Dyrmishi	Durrës	PBK

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

No	Name Surname	District	Subject
454	Ervin Çipi	Elbasan	PBK
455	Ervin Kavaja	Elbasan	PBK
456	Ervis Rama	Elbasan	NTH
457	Ervis Lipi	Korçë	NTH
458	Ervis Beu	Durrës	ABEOK
459	Ervis Myrteza	Fier	ADR
460	Ervis Muhaj	Fier	ADR
461	Ervis Shkopi	Tiranë	ADR
462	Ervis Brahimaj	Tiranë	ADR
463	Erzen Laçi	Durrës	PD-PD / AN
464	Esin Lekiq	Shkodër	BD
465	Esma Balla	Tiranë	ADR
466	Esmeralda Marfani	Lezhë	BD
467	Esmeralda Ndreca	Shkodër	ABEOK
468	Esmeralda Dusho	Berat	PBK
469	Esmeralda Abazi	Elbasan	PBK
470	Etion Joka	Tiranë	LSI
471	Etleva Damzi	Lezhë	PLDSH
472	Etleva Damzi.	Lezhë	PLDSH
473	Euglena Liçe	Berat	NTH
474	Euxhes Fetahu	Tiranë	ABEOK
475	Eva Xhediku	Tiranë	NTH
476	Eva Bogdani	Elbasan	ADR
477	Eva Bozha	Shkodër	ADR
478	Evisa Valteri	Tiranë	PSD
479	Fabian Topollari	Tiranë	BD
480	Fabio Martini	Shkodër	PSD
481	Fabiola Mama	Durrës	ABEOK
482	Fabion Dama	Durrës	ADR
483	Fabjol Kurti	Tiranë	PSD
484	Fabjola Lala	Fier	ADR
485	Fadil Merzheku	Elbasan	PD-PD / AN
486	Fanula Rustemi	Vlorë	PLDSH
487	Farudin Haxhiraj	Vlorë	PBK
488	Fatbardha Goga	Fier	PSD
489	Fatime Pepa	Berat	ABEOK
490	Fation Kullsi	Gjirokastër	PBK
491	Fatjon Deda	Tiranë	PSD
492	Fatjon Haxhiu	Tiranë	PLDSH
493	Fatjon Leçini	Tiranë	PLDSH
494	Fatjon Doci	Tiranë	PLDSH
495	Fatjon Feka	Korçë	BD
496	Fatjona Zaja	Lezhë	ABEOK
497	Fatma Maka	Shkodër	BD
498	Fatmir Sinani	Tiranë	ADR
499	Fatos Idrizi Fejzo Nikollari	Elbasan	PSD
500	<u> </u>	Durrës	ADR
501	Feliks Merolli	Tiranë	NTH
502	Fernando Xhelollari Festim Zanaj	Korçë Fier	A REOK
503	-		ABEOK
504 505	Festime Banushi Fetah Rusi	Korçë Dibër	ADR PBK
505	Fidel Ylli	Tiranë	PS
			PBK
507 508	File Telallari Fjona Xhurxhi	Fier Dibër	ADR
508	Fjorida Demko	Berat	ADR
510	Flamur Hoxha	Elbasan	PBK
510	Flamur Noka	Tiranë	PD-PD / AN
511	Figinal Nord	mune	TOTO/ AN

No	Name Surname	District	Subject
512	Flamur Shima	Fier	PLDSH
513	Flamur Alimadhi	Durrës	PBK
514	Flamur Bulku	Dibër	ADR
515	Flavia Nuraj	Tiranë	PSD
516	Flavio Kaziaj	Tiranë	BD
517	Flogert Muça	Tiranë	PLDSH
518	Flora Manuka	Tiranë	PSD
519	Flora Kolaj	Elbasan	BD
520	Flora Nika	Tiranë	ADR
521	Florenc Korra	Elbasan	BD
522	Florian Tahiri	Durrës	PD-PD / AN
523	Florian Xeka	Tiranë	ABEOK
524	Florind Sala	Durrës	PSD
525	Florinda Mata	Tiranë	ABEOK
526	Florjan Troka	Fier	PSD
527	Florjan Hyka	Durrës	PLDSH
528	Florjan Skënderaj	Vlorë	PLDSH
529	Foni Haxhimihali	Berat	BD
530	Franc Hasa	Elbasan	PSD
531	Frenkli Mema	Tiranë	ADR
532	Frrok Gjini	Shkodër	PS
533	Gazmend Doda	Tiranë	PSD
534	Gazmir Lala	Dibër	PSD
535	Gazmir Dauti	Durrës	PSD
536	Gazmir Bardhi	Shkodër	PBK
537	Genald Hallulli	Durrës	NTH
538	Genc Luanaj	Shkodër	PLDSH
539	Genci Jazxhi	Korçë	PLDSH
540	Gent Strazimiri	Tiranë	PD-PD / AN
541	Genta Tela	Elbasan	PSD
542	Genti Lasku	Tiranë	BD
543	Gentian Dervishi	Tiranë	NTH
544	Gentian Braho	Korçë	PLDSH
545	Gentjan Muça	Tiranë	BD
546	Gerald Rroshi	Tiranë	PBK
547	Gerald Çikani	Tiranë	ADR
548	Geraldo Sulkollari	Korçë	PBK
549	Geraldo Keqira	Lezhë	PBK
550	Geri Rama	Fier	PSD
551	Gerti Dhima	Fier	NTH
552	Gertjan Deda	Tiranë	PSD
553	Gesian Xhelaj	Vlorë	PSD
554	Gezim Bazelli	Durrës	PBK
555	Gëzim Ademaj	Vlorë	PD-PD / AN
556	Gëzim Ruko	Fier	NTH
557	Gëzim Boçari	Vlorë	ABEOK
558	Gëzim Breza	Shkodër	PBK
559	Gëzim Hysenllari	Tiranë	PBK
560	Gëzim Kodra	Tiranë	ADR
561	Gilberta Simoni	Fier	ADR
562	Gino Zefi	Tiranë	ABEOK
563	Gjergj Piroli	Lezhë	PSD
564	Gjergj Hatellari	Tiranë	PBK
565	Gjergji Thanasi	Durrës	ABEOK
566	Gjergji Theodhosi	Lezhë	ABEOK
567	Gjergji Nole	Tiranë	ADR
568	Gjovalin Laska	Lezhë	PD-PD / AN
569	Gjovalin Dushaj	Shkodër	BD

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No	Name Surname	District	Subject
570	Gladiola Çopa	Durrës	PSD
571	Gledi Kryemadhi	Tiranë	ADR
572	Gledis Çeliku	Shkodër	PSD
573	Gledis Lloshi	Shkodër	BD
574	Gledis Vuksani	Tiranë	ADR
575	Gledis Veseli	Tiranë	ADR
576	Gledjon Ahmeti	Vlorë	PSD
577	Greta Bardeli	Shkodër	PD-PD / AN
578	Greta Uldedaj	Tiranë	BD
579	Greta Gega	Durrës	ADR
580	Grigor Palko	Korçë	BD
581	Griselda Belaj	Durrës	NTH
582	Griselda Rushanaj	Fier	PSD
583	Gurie Haxhillari	Korçë	PBK
584	Hajdër Koxha	Berat	NTH
585	Hajdër Alimadhi	Lezhë	PBK
586	Hakiardo Hoxhallari	Korçë	ADR
587	Halil Hoxha	Fier	PBK
588	Hamëz Gjonaj	Tiranë	NTH
589	Hamit Stema	Durrës	PLDSH
590	Hatem Kapllani	Fier	PBK
591	Haxhi Raga	Durrës	PLDSH
592	Haziz Peka	Dibër	ABEOK
593	Hekuran Alia	Gjirokastër	PSD
594	Helga Sallaku	Shkodër	PD-PD / AN
595	Henrik Hamollari	Korçë	PLDSH
596	Hermes Dylgjeri	Elbasan	PSD
597	Hermes Matraku	Durrës	ADR
598	Hilmi Plava	Shkodër	ABEOK
599	Hristo Beqiraj	Vlorë	ABEOK
600	Hylvi Brahimi	Shkodër	PBK
601	Hyqmet Hamati	Tiranë	ABEOK
602	Ibrahim Shabani	Elbasan	ABEOK
603	Ido Pashaj	Fier	ABEOK
604	Igli Cara	Durrës	PD-PD / AN
605	Igli Xhurxhi	Elbasan	ADR
606	Igli Aliko	Gjirokastër	ADR
607	Ignat Basha	Fier	PLDSH
608	Igreta Sinanaj	Fier	NTH
609	Ijon Bushi	Dibër	ADR
610	Ilda Dhori	Fier	PD-PD / AN
611	Ilda Buqa	Fier	LN
612	Ilda Qarri	Fier	PLDSH
613	Ilir Balla	Tiranë	BD
614	Ilir Haluli	Vlorë	PLDSH
615	Ilir Saliasi	Durrës	BD
616	Ilir Alushi	Tiranë	ABEOK
617	Ilir Asllanaj	Tiranë	PBK
618	Ilir Visha	Tiranë	ADR
619	Iliri Çullhaj	Fier	ABEOK
620	Ilirian Ruda	Elbasan	BD
621	Ilna Xhaferri	Elbasan	PBK
622	Ina Veizaj	Vlorë	NTH
623	Ina Begotaraj	Vlorë	NTH
624	Ina Tabaku	Korçë	PSD
625	Ina Xhafer	Durrës	PLDSH
626	Ina Telallari	Tiranë	PBK
627	Indri Hoxha	Berat	ADR

No	Name Surname	District	Subject
628	Indrit Barruku	Durrës	PLDSH
629	Ines Ranxha	Korçë	ABEOK
630	Inesa Alimadhi	Fier	PBK
631	Insida Kullolli	Tiranë	ABEOK
632	Intjesa Buci	Durrës	PSD
633	Ira Kurti	Tiranë	ABEOK
634	Irena Tola	Fier	BD
635	Irena Hoxha	Shkodër	BD
636	Irida Alimadhi	Elbasan	PBK
637	Irini Goga	Tiranë	PSD
638	Irini Shehu	Dibër	PD-PD / AN
639	Irisa Bita	Fier	BD
640	Isli Malo	Durrës	ABEOK
641	Ismail Terziu	Dibër	BD
642	Isuf Zeqiraj	Fier	PBK
643	Izmira Rusi(Ulqinaku)	Shkodër	PD-PD / AN
644	Jakup Beqiri	Fier	PD-PD / AN
645	Jakup Shehu	Gjirokastër	PLDSH
646	Jera Çapuni	Fier	PLDSH
647	Jetmir Ndreu	Lezhë	PBK
648	Jetmira Shabani	Kukës	ABEOK
649	Jetnor Haruni	Vlorë	ABEOK
650	Jetnor Dyrmishi	Durrës	PBK
651	Jetnor Hysenllari	Durrës	PBK
652	Jetnor Bejtaj	Vlorë	PBK
653	Joana Qirollari	Gjirokastër	PD-PD / AN
654	Joana Disha	Tiranë	BD
655	Joana Karajani	Vlorë	ABEOK
656	Johana Bici	Durrës	PLDSH
657	Jolio Dine	Vlorë	PD-PD / AN
658	Jona Kovaçi	Elbasan	NTH
659	Jona Mustafa	Tiranë	BD
660	Jonada Gjata	Tiranë	ADR
661	Jonida Gjoka	Tiranë	ABEOK
662	Jonida Kito	Tiranë	ADR
663	Jonil Gjata	Fier	PSD
664	Joraida Kurti	Elbasan	NTH
665	Josif Komino	Gjirokastër	NTH
666	Josilda Stavri	Fier	NTH
667	Juel Velo	Tiranë	BD
668	Julian Zoto	Vlorë	PD-PD / AN
669	Julian Kodra	Korçë	PSD
670	Julian Rrista	Fier	ADR
671	Juljan Mimini	Tiranë	PLDSH
672	Jurgen Pushi	Berat	PS NITH
673 674	Jurgen Alla Jurgen Salaj	Durrës	NTH
675	Jurgen Salaj Jurgen Çela	Fier	PLDSH PLDSH
	Jurgen Çela Jurgen Çilotaj	Fier	PLDSH
676 677	Jurgen Çilotaj Jurgen Fregjaj	Vlorë Shkodër	ABEOK
678	Jurgen Fregjaj Juri Allko	Gjirokastër	BD
679	Kadri Muka	Durrës	ABEOK
680	Kapllan Skuka	Durres	BD
681	Kastriot Hysaj	Elbasan	ABEOK
682	Katerina Ago	Berat	PLDSH
683	Katerina Ago Katerina Malo	Fier	BD
684	Kejdi Xhemollari	Korçë	BD
685	Kejsi Pepa	Lezhë	NTH
000	nejsi Pepa	Lezne	INIT

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No	Name Surname	District	Subject
686	Kejsi Shingjergji	Elbasan	PSD
687	Kejsi Basha	Tiranë	ADR
688	Kevi Redhaj	Tiranë	ADR
689	Kevin Azizi	Fier	NTH
690	Kevin Bimo	Tiranë	PLDSH
691	Kevin Dodaj	Lezhë	ADR
692	Kiara Gjindali	Fier	NTH
693	Kita Nova	Berat	ABEOK
694	Kjara Adhami	Gjirokastër	PS
695	Klajdi Pllaha	Korçë	NTH
696	Klajdi Beja	Tiranë	NTH
697	Klajdi Shehu	Dibër	PLDSH
698	Klajdi Hajdari	Fier	PLDSH
699	Klajdi Toro	Fier	PBK
700	Klajdi Hida	Tiranë	PBK
701	Klara Dervishllari	Korçë	PLDSH
702	Klaudia Curaj	Korçë	NTH
703	Klaudia Gega	Lezhë	NTH
704	Klaudia Shehi	Durrës	ADR
705	Klaudiola Sinaj	Fier	PSD
706	Klaudjo Myftari	Vlorë	PSD
707	Klaudio Cobai	Fier	PLDSH
708	Klaudjo Gobaj	Gjirokastër	BD
709	Klea Kasemi	Gjirokastër	BD
710	Klea Radovani	Shkodër	ADR
711	Klearda Rapushi	Vlorë	BD
711	Kledisa Çela	Korçë	NTH
713	Kleida Mati	Gjirokastër	NTH
713	Kleiton Aliaj	Vlorë	PSD
715	Klejdi Molla	Fier	PBK
	-		PSD
716	Kleo Murataj	Tiranë	
717	Klerjan Qëndro	Fier	BD
718	Klevin Hasekiu	Elbasan	NTH
719	Klevin Durraj	Fier	PSD
720	Klevis Bahja	Elbasan	PSD
721	Klevis Bezati	Durrës	PLDSH
722	Klevis Çapia	Elbasan	ABEOK
723	Klisi Haxhiraj	Vlorë	BD
724	Klivja Doraci	Vlorë	PLDSH
725	Klodi Menalla	Elbasan	BD
726	Klodian Alija	Tiranë	PBK
727	Klodian Shtrezi	Tiranë	ADR
728	Klodiana Zhubi	Tiranë	NTH
729	Klodiana Hasanaj	Kukës	BD
730	Klodjan Mema	Tiranë	PSD
731	Klodjan Troplini	Tiranë	ABEOK
732	Koçi Tahiri	Korçë	ADR
733	Koço Barka	Gjirokastër	PD-PD / AN
734	Kol Beci	Lezhë	BD
735	Korab Lita	Tiranë	PD-PD / AN
736	Kosta Garo	Gjirokastër	PS
737	Kostaq Papa	Tiranë	ABEOK
738	Kozeta Hito	Durrës	PBK
739	Kozeta Trajko	Korçë	PBK
740	Kreshnik Metalia	Kukës	PLDSH
741	Krisabela Muço	Durrës	PSD
742	Krista Topi	Fier	PSD
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744         Kristel Frashëri         Berat         PSD           745         Kristi Bejko         Korçê         PSD           746         Kristi Gora         Tiranê         BD           747         Kristi Shyti         Gjirokastêr         ADR           748         Kristian Hajkola         Shkodêr         PBK           749         Kristiana Miho         Durrês         NTH           750         Kristiana Saliasi         Durrês         NTH           750         Kristo Veizaj         Elbasan         ADR           751         Kristo Veizaj         Elbasan         ADR           752         Kristo Evangjelu         Korçê         ABEOK           753         Kujtim Giuzi         Durrês         ABEOK           754         Kujtim Giuzi         Durrês         ABEOK           755         Kujtim Mema         Durrês         ABEOK           755         Kujtim Lleshaj         Lezhê         ADR           755         Kujtim Lleshaj         Lezhê         ADR           756         Kujtim Lleshaj         Forê         ABEOK           759         Landi Latifi         Korçê         ABEOK           760         Ledian Memi	No	Name Surname	District	Subject
746         Kristi Gora         Tirañê         BD           747         Kristi Shyti         Gjirokastêr         ADR           748         Kristian Hajkola         Shkodêr         PBK           749         Kristian Aliko         Durrês         NTH           750         Kriston Saliasi         Durrês         PBK           751         Kristo Evangjelu         Korçê         ADR           752         Kristo Evangjelu         Korçê         ADR           753         Kujtim Guzi         Durrês         ABEOK           754         Kujtim Mema         Durrês         ABEOK           755         Kujtim Lamaj         Tirañê         PBK           756         Kujtim Lamaj         Tirañê         PBK           757         Kujtim Lamaj         Lezhê         ADR           758         Laim Tota         Dibêr         ABEOK           759         Landi Latifi         Korçê         ABEOK           760         Laudja Mukaj         Tirañê         PLDSH           761         Lediana Fratari         Tirañê         PD-PD / AN           762         Lediana Fratari         Tirañê         PLDSH           763         Ledian Karc	744	Kristel Frashëri	Berat	PSD
747         Kristian Hajkola         Shkoder         ADR           748         Kristian Hajkola         Shkoder         PBK           749         Kristian Aliko         Durrès         NTH           750         Kristian Saliasi         Durrès         NTH           751         Kristo Veizaj         Elbasan         ADR           752         Kristo Evangjelu         Korçê         ADR           753         Kujtim Gjuzi         Durrès         ABEOK           754         Kujtim Gjuzi         Durrès         ABEOK           754         Kujtim Mema         Durrès         ABEOK           755         Kujtim Leshaj         Lezhê         ADR           757         Kujtim Lleshaj         Lezhê         ADR           757         Kujtim Lleshaj         Lezhê         ADR           759         Landi Latifi         Korçê         ABEOK           759         Landi Latifi         Korçê         ABEOK           760         Laudja Mukaj         Tiranê         PLDSH           761         Ledian Fratari         Tiranê         PD-PD /AN           762         Ledjan Matraxhiu         Durrês         PLDSH           763         L	745	Kristi Bejko	Korçë	PSD
748         Kristian Hajkola         Shkodër         PBK           749         Kristiana Miho         Durrës         NTH           750         Kristina Saliasi         Durrës         PBK           751         Kristo Veizaj         Elbasan         ADR           752         Kristo Evangjelu         Korçë         ADR           753         Kujtim Gjuzi         Durrës         ABEOK           754         Kujtim Gjuzi         Durrës         ABEOK           754         Kujtim Mema         Durrës         ABEOK           755         Kujtim Lamaj         Tiranë         PBK           756         Kujtim Leshaj         Lezhë         ADR           757         Kujtim Leshaj         Lezhë         ADR           758         Laim Tota         Dibër         ABEOK           759         Landi Latifi         Korçë         ABEOK           759         Landi Latifi         Korçë         ABEOK           750         Ledian Meminaj         Vlorë         BD           760         Ledian Martaxhiu         Durrës         PD-D/AN           761         Ledioa Kërçova         Berat         PBK           762         Ledjoa Kërçova <td>746</td> <td>Kristi Gora</td> <td>Tiranë</td> <td>BD</td>	746	Kristi Gora	Tiranë	BD
749         Kristiana Milho         Durrës         NTH           750         Kristiana Saliasi         Durrës         PBK           751         Kristo Veizaj         Elbasan         ADR           752         Kristo Evangjelu         Korçë         ADR           753         Kujtim Guzi         Durrës         ABEOK           754         Kujtim Tota         Dibër         ABEOK           755         Kujtim Lamaj         Tiranë         PBK           756         Kujtim Lleshaj         Lezhë         ADR           757         Kujtim Lleshaj         Lezhë         ADR           758         Laim Tota         Dibër         ABEOK           759         Landi Latifi         Korçë         ABEOK           760         Ledian Meminaj         Vlorë         BD           761         Lediana Fratari         Tiranë         PLDSH           762         Lediana Matraxhiu         Durrës         PLDSH           763         Ledjo Tarja         Tiranë         PD-PD / AN           764         Ledjona Kërçova         Beat         PBK           765         Ledjona Kërjoa         Briranë         PBK           766         Ledjoa Kap	747	Kristi Shyti	Gjirokastër	ADR
750         Kristina Saliasi         Durrés         PBK           751         Kristo Veizaj         Elbasan         ADR           752         Kristo Evangjelu         Korçê         ADR           753         Kujtim Gjuzi         Durrês         ABEOK           754         Kujtim Cangi         Dibêr         ABEOK           755         Kujtim Lemaj         Tiranê         PBK           756         Kujtim Leshaj         Lezhê         ADR           757         Kujtim Lleshaj         Lezhê         ADR           757         Kujtim Lleshaj         Lezhê         ADR           758         Laim Tota         Dibêr         ABEOK           759         Landi Latifi         Korçê         ABEOK           760         Ladja Mukaj         Tiranê         PLDSH           761         Lediana Fratari         Tiranê         PLDSH           762         Ledjan Matraxhiu         Durrês         PLDSH           763         Ledja Matraxhiu         Durrês         PLDSH           764         Ledjana Kêrçova         Berat         PBK           767         Ledjana Kapllani         Fier         PBK           767         Ledjana Kapll	748	Kristian Hajkola	Shkodër	PBK
751         Kristo Veizaj         Elbasan         ADR           752         Kristo Evangjelu         Korçē         ADR           753         Kujtim Gjuzi         Durrês         ABEOK           754         Kujtim Tota         Dibēr         ABEOK           755         Kujtim Lamaj         Tiranê         PBK           756         Kujtim Lleshaj         Lezhê         ADR           757         Kujtim Lleshaj         Lezhê         ADR           757         Kujtim Lleshaj         Lezhê         ADR           757         Kujtim Lleshaj         Lezhê         ADR           758         Laim Tota         Dibër         ABEOK           759         Landi Latifi         Korçë         ABEOK           760         Ladja Mukaj         Tiranê         PLDSH           761         Ledian Beratarai         Tiranê         PLDSH           762         Ledjan Karstati         Fier         PP-D/ AN           763         Ledjo Rastrati         Fier         PD-D/ AN           764         Ledjana Kërçova         Berat         PBK           765         Ledjona Kërçova         Berat         PBK           766         Ledjan Kërçova<	749	Kristiana Miho	Durrës	NTH
752         Kristo Evangjelu         Korçë         ADR           753         Kujtim Gjuzi         Durrês         ABEOK           754         Kujtim Tota         Dibêr         ABEOK           755         Kujtim Lamaj         Tiranë         PBK           756         Kujtim Lleshaj         Lezhë         ADR           757         Kujtim Lleshaj         Lezhë         ADR           757         Kujtim Lleshaj         Lezhë         ADR           757         Kujtim Lamaj         Tiranë         PBK           758         Laim Tota         Dibêr         ABEOK           759         Ladia Allesti         Korçë         ABEOK           760         Laudja Mukaj         Tiranë         PLDSH           761         Ledian Meminaj         Vlorë         BD           762         Lediana Fratari         Tiranë         PLDSH           763         Ledjo Tarja         Tiranë         PLDSH           764         Ledjona Kërçova         Berat         PBK           765         Ledjona Kërçova         Berat         PBK           766         Ledjan Agilani         Fier         PSD           768         Lefter Muskaj	750	Kristina Saliasi	Durrës	PBK
753         Kujtim Gjuzi         Durës         ABEOK           754         Kujtim Tota         Dibër         ABEOK           755         Kujtim Mema         Durrës         ABEOK           756         Kujtim Lamaj         Tiranë         PBK           757         Kujtim Lleshaj         Lezhë         ADR           758         Laim Tota         Dibër         ABEOK           759         Landi Latifi         Korçë         ABEOK           760         Laudja Mukaj         Tiranë         PLDSH           761         Lediana Meminaj         Vlorë         BD           762         Lediana Fratari         Tiranë         PLDSH           763         Ledjo Kastrati         Fier         PD-PD/AN           763         Ledjoa Kastrati         Fier         PD-PD/AN           764         Ledjana Kapllani         Fier         PBK           765         Ledjona Kërçova         Berat         PBK           767         Ledjona Kapllani         Fier         PBK           767         Ledjona Kapllani         Fier         PSD           769         Lejka Bonjakaj         Vlorë         ABEOK           770         Lena Saliasi <td>751</td> <td>Kristo Veizaj</td> <td>Elbasan</td> <td>ADR</td>	751	Kristo Veizaj	Elbasan	ADR
754         Kujtim Tota         Dibēr         ABEOK           755         Kujtim Mema         Durrēs         ABEOK           756         Kujtim Lamaj         Tiranē         PBK           757         Kujtim Lleshaj         Lezhē         ADR           758         Laim Tota         Dibēr         ABEOK           759         Landi Latifi         Korçē         ABEOK           760         Laudja Mukaj         Tiranē         PLDSH           761         Ledian Meminaj         Vlorē         BD           762         Ledian Meminaj         Vlorē         BD           763         Ledio Kastrati         Fier         PD-PD / AN           764         Ledjon Tarja         Tiranē         PLDSH           765         Ledjo Tarja         Tiranē         PLDSH           766         Ledjona Kapllani         Fier         PBK           767         Ledjona Kapllani         Fier         PBK           769         Lejka Bonjakaj         Vlorē         ABEOK           770         Lena Saliasi         Durrēs         PBK           771         Lena Saliasi         Durrēs         PBK           772         Lena Kapaj <td< td=""><td>752</td><td>Kristo Evangjelu</td><td>Korçë</td><td>ADR</td></td<>	752	Kristo Evangjelu	Korçë	ADR
755         Kujtim Mema         Durrēs         ABEOK           756         Kujtim Lamaj         Tiranē         PBK           757         Kujtim Lleshaj         Lezhē         ADR           758         Laim Tota         Dibēr         ABEOK           759         Landi Latifi         Korçē         ABEOK           760         Laudja Mukaj         Tiranē         PLDSH           761         Ledian Meminaj         Vlorē         BD           762         Ledian Fratari         Tiranē         PD-PD / AN           763         Ledjo Kastrati         Fier         PD-PD / AN           764         Ledjan Matraxhiu         Durrēs         PLDSH           765         Ledjona Kërçova         Berat         PBK           766         Ledjona Kërçova         Berat         PBK           767         Ledjana Kapllani         Fier         PSD           768         Lefter Muskaj         Fier         PSD           769         Lejka Bonjakaj         Vlorë         ABEOK           770         Leme Hidri         Elbasan         PSD           771         Lena Saliasi         Durrës         PBK           772         Lena Kapaj	753	Kujtim Gjuzi	Durrës	ABEOK
756 Kujtim Lamaj Tiranė PBK 757 Kujtim Lleshaj Lezhė ADR 758 Laim Tota Diber ABEOK 759 Landi Latifi Korçė ABEOK 760 Laudja Mukaj Tiranė PLDSH 761 Ledian Meminaj Vlorė BD 762 Lediana Fratari Tiranė PD-PD / AN 763 Ledio Kastrati Fier PD-PD / AN 764 Ledjan Matraxhiu Durrės PLDSH 765 Ledjo Tarja Tiranė PLDSH 766 Ledjona Kerçova Berat PBK 767 Ledjona Kapllani Fier PSD 768 Lefter Muskaj Fier PSD 769 Lejka Bonjakaj Vlorė ABEOK 770 Leme Hidri Elbasan PSD 771 Lena Saliasi Durrės PBK 772 Lenci Kapaj Fier PLDSH 773 Leonard Toçi Elbasan NTH 774 Leonard Olli Korçė BD 775 Leonard Mema Tiranė ABEOK 776 Leonida Laci Lezhė PBK 777 Lindita Bezhani Elbasan ABEOK 778 Lirim Pole Fier ABEOK 779 Livja Kyçyku Tiranė NTH 780 Lodovik Hasani Shkodėr PD-PD / AN 781 Lora Balliu Diber PSD 782 Lorenc Shuka Durrës PSD 783 Lorenc Shehaj Fier BD 784 Lorea Shehaj Fier BD 785 Leonard Mema Tiranė ABEOK 786 Lori Sina Fier ABEOK 787 Lindita Bezhani Tiranė NTH 780 Lodovik Hasani Shkodėr PD-PD / AN 781 Lora Balliu Diber PSD 782 Lorenc Shehaj Fier ADR 783 Lorenc Shehaj Fier ADR 784 Lorea Shehaj Tiranė BD 785 Lori Sina Fier ADR 786 Loria Pashaj Tiranė BD 787 Luan Jakimi Diber ABEOK 788 Luan Haka Diber PD-PD / AN 789 Lualjeta Sejko Fier ABEOK 790 Lubjana Konomi Tiranė ADR 791 Ludjano Hysi Gjirokastėr ADR 792 Luiza Miraka Fier ABEOK 793 Luiza Kola Tiranė PBK 794 Luljeta Sejko Fier PD-PD / AN 795 Lulijeta Haxhillari Gjirokastėr PBK 797 Lulzim Gaxherri Tiranė ADR 798 Lumturi Hasa Elbasan PBK 799 Lumturi Hasa Elbasan PD-PD / AN 799 Lumturi Hasa Elbasan PD-PD / AN 799 Lumturi Hasa Elbasan PD-PD / AN	754	Kujtim Tota	Dibër	ABEOK
757Kujtim LleshajLezhèADR758Laim TotaDibērABEOK759Landi LatifiKorçêABEOK760Laudja MukajTiranêPLDSH761Ledian MeminajVlorêBD762Lediana FratariTiranêPD-PD/AN763Ledio KastratiFierPD-PD/AN764Ledjan MatraxhiuDurrësPLDSH765Ledjona KërçovaBeratPBK766Ledjona KapllaniFierPBK767Lejka BonjakajVlorêABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrësPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçêBD775Leonard MemaTiranêABEOK776Leonida LaciLezhêPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranêNTH780Lodovik HasaniShkodêrPD-PD/AN781Lora BalliuDibêrPSD782Lorenc ShehajFierBD783Lorenc ShehajFierBD784Loreta LeskajTiranêBD785Loria PashajTiranêBD786Loria PashajTiranêBD787Ludjano HysiGjirokastêrADR <t< td=""><td>755</td><td>Kujtim Mema</td><td>Durrës</td><td>ABEOK</td></t<>	755	Kujtim Mema	Durrës	ABEOK
T58 Laim Tota Dibër ABEOK T59 Landi Latifi Korçë ABEOK T60 Laudja Mukaj Tiranë PLDSH T61 Ledian Meminaj Vlorë BD T62 Lediana Fratari Tiranë PD-PD / AN T63 Ledio Kastrati Fier PD-PD / AN T64 Ledjan Matraxhiu Durrës PLDSH T65 Ledjona Kërçova Berat PBK T66 Ledjona Kërçova Berat PBK T67 Ledjona Kapllani Fier PSD T68 Lefter Muskaj Fier PSD T69 Lejka Bonjakaj Vlorë ABEOK T70 Leme Hidri Elbasan PSD T71 Lena Saliasi Durrës PBK T72 Lenci Kapaj Fier PLDSH T73 Leonard Toçi Elbasan NTH T74 Leonard Olli Korçë BD T75 Leonard Mema Tiranë ABEOK T76 Leonida Laci Lezhë PBK T77 Lindita Bezhani Elbasan ABEOK T78 Lirim Pole Fier ABEOK T79 Livja Kyçyku Tiranë NTH T80 Lodovik Hasani Shkodër PD-PD / AN T81 Lora Balliu Dibër PSD T82 Lorenc Shuka Durrës PSD T83 Lorenc Shehaj Fier BD T84 Loreta Leskaj Tiranë BD T85 Lori Sina Fier ADR T86 Loria Pashaj Tiranë BD T87 Luan Jakimi Dibër ABEOK T88 Luan Mulla Korçë PBK T89 Luan Haka Dibër PD-PD / AN T89 Ludjana Konomi Tiranë ABEOK T79 Livja Myçyku Tiranë BD T87 Luan Jakimi Dibër ABEOK T88 Luan Mulla Korçë PBK T89 Luan Haka Dibër ABEOK T99 Livja Mycka Fier ABEOK T99 Lubjana Konomi Tiranë ADR T90 Ludjano Hysi Gjirokastër ADR T91 Ludjano Hysi Gjirokastër ADR T92 Luiza Miraka Fier ABEOK T93 Luiza Kola Tiranë PBK T94 Luljeta Sejko Fier PD-PD / AN T95 Luljeta Haxhillari Gjirokastër PBK T98 Lumturi Hasa Elbasan PBK T99 Lumturi Hasa Elbasan PBK T99 Lumturi Hasa Elbasan PD-PD / AN T99 Lumturi Hasa Elbasan PD-PD / AN	756	Kujtim Lamaj	Tiranë	PBK
759Landi LatifiKorçêABEOK760Laudja MukajTiranêPLDSH761Ledian MeminajVlorêBD762Lediana FratariTiranêPD-PD / AN763Ledio KastratiFierPD-PD / AN764Ledjan MatraxhiuDurrêsPLDSH765Ledjona KêrçovaBeratPBK766Ledjona KapllaniFierPBK767Ledjona KapllaniFierPSD768Lefter MuskajFierPSD769Lejka BonjakajVlorêABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrêsPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçêBD775Leonard MemaTiranêABEOK776Leonida LaciLezhêPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranêNTH780Lodovik HasaniShkodêrPD-PD / AN781Lora BalliuDibêrPSD782Lorenc ShehajFierBD783Lorenc ShehajFierBD784Loria PashajTiranêBD785Luan JakimiDibêrABEOK786Loria PashajTiranêBD787Lualjano HysiGjirokastêrPBK <td>757</td> <td>Kujtim Lleshaj</td> <td>Lezhë</td> <td>ADR</td>	757	Kujtim Lleshaj	Lezhë	ADR
760Laudja MukajTiranëPLDSH761Ledian MeminajVlorëBD762Lediana FratariTiranëPD-PD / AN763Ledio KastratiFierPD-PD / AN764Ledjon MatraxhiuDurrësPLDSH765Ledjo TarjaTiranëPLDSH766Ledjona KërçovaBeratPBK767Ledjona KapllaniFierPBK768Lefter MuskajFierPSD769Lejka BonjakajVlorëABEOK770Lema HidriElbasanPSD771Lena SaliasiDurrësPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçëBD775Leonard MemaTiranëABEOK776Leonida LaciLezhëPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranëNTH780Lodovik HasaniShkodërPD-PD / AN781Lora BalliuDibërPSD782Lorenc ShehajFierBD783Lorenc ShehajFierBD784Loreta LeskajTiranëBD785Loria PashajTiranëBD786Loria PashajTiranëBD788Luan HakaDibërABEOK789Lualigano HysiGjirokastërADR<	758	Laim Tota	Dibër	ABEOK
761Ledian MeminajVlorêBD762Lediana FratariTiranêPD-PD / AN763Ledio KastratiFierPD-PD / AN764Ledjan MatraxhiuDurrêsPLDSH765Ledjo TarjaTiranêPLDSH766Ledjona KërçovaBeratPBK767Ledjona KapllaniFierPBK768Lefter MuskajFierPSD769Lejka BonjakajVlorêABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrêsPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçêBD775Leonard MemaTiranêABEOK776Leonida LaciLezhêPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranêNTH780Lodovik HasaniShkodêrPD-PD / AN781Lora BalliuDibêrPSD782Lorenc ShehajFierBD783Lorenc ShehajFierBD784Loreta LeskajTiranêBD785Luri SinaFierADR786Loria PashajTiranêBD787Luan JakimiDibêrPD-PD / AN788Luan HakaDibêrPD-PD / AN790Lubjana KonomiTiranêADR </td <td>759</td> <td>Landi Latifi</td> <td>Korçë</td> <td>ABEOK</td>	759	Landi Latifi	Korçë	ABEOK
762Lediana FratariTiranëPD-PD / AN763Ledio KastratiFierPD-PD / AN764Ledjan MatraxhiuDurrësPLDSH765Ledjo TarjaTiranëPLDSH766Ledjona KërçovaBeratPBK767Ledjona KapllaniFierPBK768Lefter MuskajFierPSD769Lejka BonjakajVlorëABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrësPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçëBD775Leonard MemaTiranëABEOK776Leonida LaciLezhëPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranëNTH780Lodovik HasaniShkodërPD-PD / AN781Lora BalliuDibërPSD782Lorenc ShukaDurrësPSD783Lorenc ShehajFierBD784Loreta LeskajTiranëBD785Lori SinaFierADR786Loria PashajTiranëBD787Luan JakimiDibërABEOK788Luan HakaDibërPD-PD / AN790Lubjana KonomiTiranëADR791Ludjano HysiGjirokastërADR	760	Laudja Mukaj	Tiranë	PLDSH
763Ledio KastratiFierPD-PD / AN764Ledjan MatraxhiuDurrësPLDSH765Ledjo TarjaTiranëPLDSH766Ledjona KërçovaBeratPBK767Ledjona KapllaniFierPBK768Lefter MuskajFierPSD769Lejka BonjakajVlorëABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrësPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçëBD775Leonard MemaTiranëABEOK776Leonida LaciLezhëPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranëNTH780Lodovik HasaniShkodërPD-PD / AN781Lora BalliuDibërPSD782Lorenc ShehajFierBD783Lorenc ShehajFierBD784Loria PashajTiranëBD785Lori SinaFierADR786Loria PashajTiranëBD787Luan HakaDibërABEOK788Luan HakaDibërPD-PD / AN790Lubjana KonomiTiranëADR791Ludjano HysiGjirokastërADR792Luiza MirakaFierABEOK79	761	Ledian Meminaj	Vlorë	BD
764Ledjan MatraxhiuDurrësPLDSH765Ledjo TarjaTiranëPLDSH766Ledjona KërçovaBeratPBK767Ledjona KapllaniFierPBK768Lefter MuskajFierPSD769Lejka BonjakajVlorëABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrësPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçëBD775Leonard MemaTiranëABEOK776Leonida LaciLezhëPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranëNTH780Lodovik HasaniShkodërPD-PD/AN781Lora BalliuDibërPSD782Lorenc ShehajFierBD783Lorenc ShehajFierBD784Loreta LeskajTiranëBD785Lori SinaFierADR786Loria PashajTiranëBD787Luan JakimiDibërABEOK788Luan HakaDibërPD-PD/AN790Lubjana KonomiTiranëADR791Ludjano HysiGjirokastërADR792Luiza MirakaFierABEOK793Luiza KolaTiranëPBK794	762	Lediana Fratari	Tiranë	PD-PD / AN
765Ledjo TarjaTiranëPLDSH766Ledjona KërçovaBeratPBK767Ledjona KapllaniFierPBK768Lefter MuskajFierPSD769Lejka BonjakajVlorëABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrësPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçëBD775Leonard MemaTiranëABEOK776Leonida LaciLezhëPBK777Lindita BezhaniElbasanABEOK778Lirim PoleFierABEOK779Livja KyçykuTiranëNTH780Lodovik HasaniShkodërPD-PD / AN781Lora BalliuDibërPSD782Lorenc ShukaDurrësPSD783Lorenc ShehajFierBD784Loreta LeskajTiranëBD785Lori SinaFierADR786Loria PashajTiranëBD787Luan JakimiDibërABEOK788Luan HakaDibërPD-PD / AN790Lubjana KonomiTiranëADR791Ludjano HysiGjirokastërADR792Luiza MirakaFierABEOK793Luiza KolaTiranëPBK794Luljeta SejkoFierPD-PD / AN795 <td>763</td> <td>Ledio Kastrati</td> <td>Fier</td> <td>PD-PD / AN</td>	763	Ledio Kastrati	Fier	PD-PD / AN
766 Ledjona Kërçova Berat PBK 767 Ledjona Kapllani Fier PBK 768 Lefter Muskaj Fier PSD 769 Lejka Bonjakaj Vlorë ABEOK 770 Leme Hidri Elbasan PSD 771 Lena Saliasi Durrës PBK 772 Lenci Kapaj Fier PLDSH 773 Leonard Toçi Elbasan NTH 774 Leonard Olli Korçë BD 775 Leonard Mema Tiranë ABEOK 776 Leonida Laci Lezhë PBK 777 Lindita Bezhani Elbasan ABEOK 778 Lirim Pole Fier ABEOK 779 Livja Kyçyku Tiranë NTH 780 Lodovik Hasani Shkodër PD-PD / AN 781 Lora Balliu Dibër PSD 782 Lorenc Shuka Durrës PSD 783 Lorenc Shehaj Fier BD 784 Loreta Leskaj Tiranë BD 785 Lori Sina Fier ADR 786 Loria Pashaj Tiranë BD 787 Luan Jakimi Dibër ABEOK 788 Luan Mulla Korçë PBK 789 Luan Haka Dibër PD-PD / AN 790 Lubjana Konomi Tiranë ADR 791 Ludjano Hysi Gjirokastër ADR 792 Luiza Miraka Fier ABEOK 793 Luiza Kola Tiranë PBK 794 Luljeta Sejko Fier PD-PD / AN 795 Luljeta Haxhillari Gjirokastër PBK 796 Lulzim Daka Elbasan PBK 797 Lulzim Gaxherri Tiranë ADR 798 Lumturi Hasa Elbasan PD-PD / AN 799 Lumturi Hasa Elbasan PD-PD / AN 799 Lumturi Harizi Tiranë PLDSH 799 Lumturi Proko Tiranë PBK	764	Ledjan Matraxhiu	Durrës	PLDSH
767Ledjona KapllaniFierPBK768Lefter MuskajFierPSD769Lejka BonjakajVlorêABEOK770Leme HidriElbasanPSD771Lena SaliasiDurrësPBK772Lenci KapajFierPLDSH773Leonard ToçiElbasanNTH774Leonard OlliKorçëBD775Leonard MemaTiranëABEOK776Leonida LaciLezhëPBK777Lindita BezhaniElbasanABEOK779Livja KyçykuTiranëNTH780Lodovik HasaniShkodërPD-PD / AN781Lora BalliuDibërPSD782Lorenc ShukaDurrësPSD783Lorenc ShehajFierBD784Loreta LeskajTiranëBD785Lori SinaFierADR786Loria PashajTiranëBD787Luan JakimiDibërABEOK788Luan HakaDibërADR790Lubjana KonomiTiranëADR791Ludjano HysiGjirokastërADR792Luiza MirakaFierABEOK793Luiza KolaTiranëPBK794Luljeta HaxhillariGjirokastërPBK795Luljeta HaxhillariGjirokastërPBK796Lulzim DakaElbasanPD-PD / AN799Lumturi HasaElbasanPD-PD / AN<	765	Ledjo Tarja	Tiranë	PLDSH
Tobal Lefter Muskaj Fier PSD Tobal Lejka Bonjakaj Vlorë ABEOK Tobal Lejka Bonjakaj Vlorë ABEOK Tobal Leme Hidri Elbasan PSD Tobal Lena Saliasi Durrës PBK Tobal Lenard Toçi Elbasan NTH Tobal Leonard Olli Korçë BD Tobal Leonard Mema Tiranë ABEOK Tobal Leonida Laci Lezhë PBK Tobal Leonida Laci Lezhë PBK Tobal Leonida Laci Lezhë PBK Tobal Lirim Pole Fier ABEOK Tobal Lodovik Hasani Shkodër PD-PD / AN Tobal Lora Balliu Dibër PSD Tobal Lorenc Shuka Durrës PSD Tobal Lorenc Shehaj Fier BD Tobal Lorenc Shehaj Fier BD Tobal Loria Pashaj Tiranë BD Tobal Loria Pashaj Tiranë BD Tobal Loria Pashaj Tiranë BD Tobal Luan Jakimi Dibër ABEOK Tobal Luan Haka Dibër PD-PD / AN Tobal Luan Haka Dibër PD-PD / AN Tobal Ludjano Hysi Gjirokastër ADR Tobal Luiza Miraka Fier ABEOK Tobal Luiza Miraka Fier ABEOK Tobal Luiza Kola Tiranë PBK Tobal Lulieta Sejko Fier PD-PD / AN Tobal Lulieta Haxhillari Gjirokastër PBK Tobal Lulieta Haxhillari Gjirokastër PBK Tobal Lulieta Gaxherri Tiranë ADR Tobal Lulieta Gaxherri Tiranë ADR Tobal Lumturi Hasa Elbasan PD-PD / AN Tobal Lumturi Hasa Elbasan PD-PD / AN Tobal Lumturi Harizi Tiranë PLDSH Tobal Lumturi Proko Tiranë PBK	766	Ledjona Kërçova	Berat	PBK
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801 Lura Fida Tiranë PSD	800	Lumturi Proko	Tiranë	PBK
	801	Lura Fida	Tiranë	PSD

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

No	Name Surname	District	Subject
802	Madrit Gjetaj	Durrës	NTH
803	Majkeljano Zotaj	Vlorë	PSD
804	Majlind Mejdani	Berat	LRE
805	Majlind Duro	Gjirokastër	PBK
806	Majlinda Gropa	Fier	PSD
807	Majlinda Gjergji	Lezhë	PBK
808	Maksim Ferra	Tiranë	ABEOK
809	Maksim Isa	Elbasan	PBK
810	Malvina Bacaj	Lezhë	PSD
811	Malvina Sina	Shkodër	ADR
812	Manjola Luku	Durrës	PD-PD / AN
813	Manjola Naço	Tiranë	BD
814	Manjola Lleshaj	Korçë	ADR
815	Manushaqe Markaj	Tiranë	PLDSH
816	Manushaqe Çela	Elbasan	PBK
817	Marcela Lala	Fier	PLDSH
818	Marçelo Gjondrekaj	Shkodër	ADR
819	Mardena Kelmendi	Tiranë	BD
820	Marenglen Koçiu	Gjirokastër	ABEOK
821	Margarita Bendo	Gjirokastër	PLDSH
822	Mariglen Dërka	Fier	PLDSH
823	Marije Çipi	Berat	ABEOK
824	Mariklen Haxhi-Jahja	Durrës	PSD
825	Marildo Hodaj	Vlorë	BD
826	Marin Nikolla	Fier	ADR
827	Marina Duhani	Shkodër	PSD
828	Marinela Petro	Fier	ABEOK
829	Mario Abazaj	Tiranë	NTH
830	Mario Ciko	Tiranë	PLDSH
831	Marjan Nikolli	Shkodër	PLDSH
832	Marjana Jaho	Berat	NTH
833	Marjana Dollani	Elbasan	ABEOK
834	Marjana Dushku	Lezhë	PBK
835	Marjeta Halili	Korçë	PD-PD / AN
836	Marjo Çela	Fier	ABEOK
837	Marjo Kasalla	Durrës	ADR
838	Marjon Kushi	Elbasan	PSD
839	Mark Marku	Lezhë	PD-PD / AN
840	Markeljano Puka	Fier	PSD
841	Marko Nik-ulaj	Lezhë	PSD
842	Marko Meraj	Tiranë	ADR
843	Marsel Rupi	Durrës	NTH
844	Marsel Zaja	Tiranë	ABEOK
845	Marsela Qari	Korçë	PLDSH
846	Marsela Subashi	Durrës	BD
847	Marselino Doko	Fier	NTH
848	Mart Gjepali	Tiranë	ADR
849	Martin Ndreca	Lezhë	PLDSH
850	Martin Marku	Lezhë	PBK
851	Matilda Bako	Korçë	NTH
852	Matilda Çela	Fier	ADR
853	Megi Hoxha	Korçë	PLDSH
854	Megi Rrasa	Elbasan	BD
855	Megi Stojku	Kukës	ADR ADR
856	Mehdi Shehu	Elbasan	PD-PD / AN
857	Mehmet Dida	Dibër	ADR
858	Mekloida Gostima	Elbasan	ADR
859	Melaim Damzi	Dibër	PS

No	Name Surname	District	Subject
860	Melsiana Himalli	Vlorë	PLDSH
861	Menkela Marku	Shkodër	ADR
862	Meri Gjikaj	Vlorë	NTH
863	Meri Markiçi	Shkodër	PSD
864	Merita Dakovelli	Durrës	PD-PD / AN
865	Merita Preza	Shkodër	ABEOK
866	Mesila Doda	Tiranë	PD-PD / AN
867	Mestan Myftarago	Tiranë	PBK
868	Metohor Brahimaj	Berat	PBK
869	Migena Rizja	Durrës	NTH
870	Migena Pinderi	Korçë	PSD
871	Migena Ruzhdija	Fier	BD
872	Milika Kurici	Berat	ADR
873	Mimoza Elezi	Durrës	ABEOK
874	Mimoza Shosha	Tiranë	ABEOK
875	Miranda Saimeja	Fier	ADR
876	Miranda Sinanaj	Vlorë	ADR
877	Mirel Bengu	Tiranë	BD
878	Mirela Dragoni(Tabaku)	Tiranë	PD-PD / AN
879	Mirela Oktrova	Tiranë	BD
880	Miriana Dyrmishi	Durrës	PBK
881	Mirilda Zoto(Gega)	Korçë	PLDSH
882	Mirjeta Elezi	Shkodër	PLDSH
883	Mirlinda Halili	Tiranë	PSD
884	Mithat Pisha	Elbasan	ABEOK
885	Mitjon Sota	Fier	NTH
886	Muhamet Hysen	Durrës	PLDSH
887	Muhamet Bregu	Elbasan	PBK
888	Muharrem Senka	Berat	PSD
889	Musa Dubali	Tiranë	BD
890	Mustafa Godina	Fier	NTH
891	Mustafa Dusho	Berat	PBK
892	Mustafa Ymeri	Elbasan	PBK
893	Myslim Murrizi	Tiranë	PLDSH
894	Nada Daullja	Vlorë	PD-PD / AN
895	Nadire Meçorapaj	Vlorë	PD-PD / AN
896	Nadire Zemblaku	Korçë	ABFOK
897	Nafie Qerimi	Fier	ABEOK
898	Naim Xhaja	Durrës	PLDSH
899	Naime Gjongecaj	Tiranë	PLDSH
900	Najada Keka	Fier	NTH
901	Namik Jahaj	Vlorë	PSD
902	Napolon Laska	Tiranë	NTH
903	Natasha Sollaku	Fier	PSD
904	Natasha Koçiaj	Vlorë	ADR
905	Ndrec Llusku	Tiranë	PSD
906	Neim Shoraj	Vlorë	PBK
907	Nerison Cenollari	Fier	NTH
908	Neritan Behri	Shkodër	PLDSH
909	Nertila Plaku	Elbasan	NTH
910	Nertila Shalari	Berat	ABEOK
911	Nevila Adhami	Gjirokastër	PSD
912	Nezir Keta	Tiranë	PLDSH
913	Niko Suli	Fier	ABEOK
914	Nikolin Faslia	Tiranë	PSD
915	Nikolin Gjeloshi	Shkodër	BD
916	Nimet Musaj	Fier	PS
917	Niva Sejko	Fier	ADR
918	Njazi Haka	Tiranë	PLDSH

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

No	Name Surname	District	Subject
919	Nustret Avdulla	Fier	PD-PD / AN
920	Odhisea Gremo	Gjirokastër	ABEOK
921	Oerd Bylykbashi	Durrës	PD-PD / AN
922	Olimbi Kullolli	Kukës	PLDSH
923	Olsi Jazxhiu	Tiranë	ABEOK
924	Olsi Zylyftari	Berat	ADR
925	Oltjan Balla	Elbasan	ADR
926	Oltjon Rexhepi	Elbasan	ADR
927 928	Oresja Baçe	Fier Tiranë	PSD PSD
929	Orges Shehaj Orges Hoti	Durrës	PLDSH
930	Orgest Kuqi	Tiranë	BD
931	Orjela Nebijaj	Tiranë	PD-PD / AN
932	Ornela Arapi	Elbasan	NTH
933	Orneldi Leka	Korçë	PSD
934	Orsilda Gjini	Lezhë	BD
935	Pajtesa Bisha	Tiranë	ABEOK
936	Pal Prekperaj	Tiranë	PBK
937	Pali Panxhi	Lezhë	ABEOK
938	Panajot Soko	Tiranë	NTH
939	Panajot Agora	Gjirokastër	PSD
940	Paola Çapuni	Tiranë	PLDSH
941	Paola Halili	Gjirokastër	ADR
942	Pellumb Nako	Berat	PD-PD / AN
943	Pëllumb Zekaj	Vlorë	PBK
944	Pëllump Brakollari	Durrës	PBK
945	Perparim Memia	Tiranë	ABEOK
946	Petrit Doda	Tiranë	PD-PD / AN
947	Petrit Luli	Berat	PBK
948	Petrit Kamberi	Tiranë	PBK
949	Plarent Aleksi	Berat	BD
950	Pranvera Shera	Tiranë	NTH
951	Qazim Alimadhi	Korçë	PBK
952	Qazim Mesiti	Tiranë	PBK
953	Radion Dhromi	Tiranë	PSD
954	Rafaela Marku	Dibër	NTH
955	Railda Droboniku	Tiranë	PBK
956	Raimond Dogjani	Kukës	PSD
957	Raisa Çani	Tiranë	BD
958 959	Rajmonda Dalipaj Raimonda Lleshi	Berat Lezhë	PSD PLDSH
960	Ramadan Likaj	Shkodër	PD-PD / AN
961	Ramazan Toromani	Elbasan	ADR
962	Redi Hebovija	Shkodër	BD
963	Redona Kajo	Tiranë	BD
964	Renato Coku	Shkodër	BD
965	Renid Nishani	Shkodër	NTH
966	Renuar Kodra	Fier	NTH
967	Rezeart Tusha	Durrës	PD-PD / AN
968	Ridjan Dedaj	Durrës	PSD
969	Ridvald Dhimo	Korçë	NTH
970	Ridvan Mersinaj	Vlorë	PBK
971	Rigels Mëhilli	Gjirokastër	PSD
972	Rigels Bejko	Tiranë	PSD
973	Rigels Banaj	Tiranë	BD
974	Rigers Çupi	Dibër	PLDSH
975	Rigers Shpërdheja	Durrës	PLDSH
976	Rigers Mali	Tiranë	PLDSH
977	Rigerta Allushi	Elbasan	NTH
978	Rigerta Loku	Lezhë	NTH
979	Rina Giorgia Rusi	Tiranë	ADR
980	Rinaldo Malko	Vlorë	NTH

No	Name Surname	District	Subject
981	Robert Bitri	Fier	PS
982	Roel Simaku	Durrës	BD
983	Roland Mimini	Elbasan	BD
984	Roland Coga	Elbasan	BD
985	Roland Llato	Fier	ABEOK
986	Roland Bejko	Gjirokastër	PD-PD / AN
987	Rolenc Mato	Berat	ADR
988	Romario Krasniqi	Durrës	PLDSH
989	Romario Ndoci	Shkodër	PLDSH
990	Romarjo Bora	Elbasan	BD
991	Ronaldo Mollaymeri	Korçë	PBK PSD
992 993	Rovena Bajrami Rovena Dauti	Elbasan Vlorë	PSD
993	Roza Hilaj	Lezhë	PD-PD / AN
995	Rozher Prifti	Korçë	ABEOK
996	Rrezarta Hoxha	Durrës	PSD
997	Rubin Omuri	Kukës	PSD
998	Rudina Hajdaraj	Elbasan	NTH
999	Rudjana Shkrepa	Gjirokastër	ABEOK
1000	Sabina Zejneli	Shkodër	ABEOK
1001	Sadik Zegiri	Dibër	PBK
1002	Saimir Korreshi	Fier	PD-PD / AN
1003	Saimir Bushi	Dibër	NTH
1004	Saimir Meçani	Gjirokastër	NTH
1005	Saimir Gjoka	Tiranë	BD
1006	Sajmir Kurti	Dibër	PLDSH
1007	Sali Berisha	Tiranë	PD-PD / AN
1008	Salvador Kaçaj	Lezhë	PD-PD / AN
1009	Salvador Senia	Durrës	PLDSH
1010	Samed Bushati	Shkodër	PSD
1011	Sanie Hajdarmetaj	Kukës	ABEOK
1012	Sanije Kaca	Elbasan	BD
1013	Santiljano Kovaçi	Berat	ADR
1014	Sara Tarllamishi	Durrës	PLDSH
1015	Sara Jorgji	Gjirokastër	PBK
1016	Sara Tuku	Elbasan	ADR
1017	Sarina Zaja	Lezhë	ABEOK
1018	Sebastjano Malotaj	Lezhë	PSD
1019	Sejdi Babaliu	Berat	PSD
1020 1021	Sejrije Nika Sela Stërmolli	Tiranë	PSD
1021	Sela Stermolli Selami Jenishehri	Korçë Tiranë	PBK ABEOK
1022	Selim Lela	Dibër	
1023	Selman Tema	Durrës	NTH PD-PD / AN
1024	Senera Hoxha	Tiranë	PSD PSD
1025	Serdar Hoxha	Shkodër	PSD
1027	Servete Lloha	Kukës	PBK
1028	Serxhia Çupi	Tiranë	PSD
1029	Serxho Koçi	Dibër	ADR
1030	Shahin Baramaj	Tiranë	NTH
1031	Shahin Aliaj	Gjirokastër	BD
1032	Shahin Dokuzi	Tiranë	BD
1033	Shefqet Hasanbashaj	Fier	BD
1034	Shkelqim Muhaj	Gjirokastër	BD
1035	Shkëlqim Xhepa	Tiranë	PLDSH
1036	Shkëlqim Ymeraj	Fier	ADR
1037	Shkëlzen Kreci	Elbasan	ABEOK
1038	Shkumbin Hoxha	Kukës	PLDSH
1039	Shpetim Zinxhiria	Vlorë	ABEOK
1040	Shpëtim Bekteshi	Shkodër	NTH
1041	Shpëtim Meta	Elbasan	PSD
1042	Shpëtim Idrizi	Tiranë	PD-PD / AN

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No	Name Surname	District	Subject
1043	Shpëtim Kodhelaj	Tiranë	ABEOK
1044	Shqipe Narta	Fier	ABEOK
1045	Shtjefen Staku	Shkodër	ABEOK
1046	Shyrete Koka	Kukës	PD-PD / AN
1047	Sibora Sulillari	Gjirokastër	ADR
1048	Sidorela Ahmeti	Lezhë	NTH
1049	Sidorela Skëndaj	Vlorë	PSD
1050	Sidorela Kolaci	Korçë	BD
1051	Silvana Gega	Tiranë	NTH
1052	Silvana Mataj	Durrës	BD
1053	Silvana Shehu	Fier	BD
1054	Silvana Bushati	Shkodër	ABEOK
1055	Sinan Shala	Tiranë	PSD
1056	Sintonela Pashaj	Vlorë	BD
1057	Skënder Tarllamishi	Durrës	PLDSH
1058	Skifter Xhepa	Dibër	PLDSH
1059	Sokol Ahmeti	Tiranë	PBK
1060	Sonila Aliu	Durrës	PLDSH
1061	Sonila Hysenllari	Durrës	PBK
1062	Sonita Maliqi	Durrës	PLDSH PBK
1063	Sorjana Kume	Fier Fier	BD
1064 1065	Sotiraq Bega	Tiranë	PS
1065	Spartak Braho Spartak Koltraka	Dibër	PS PS
1067	Spiro Bezhani	Korçë	ABEOK
1068	Spiro Josif	Korcë	ABEOK
1069	Stavrag Trako	Tiranë	ABEOK
1070	Stefan Strazimiri	Durrës	ADR
1071	Stela Kapurani	Elbasan	BD
1072	Stela Kerimi	Fier	BD
1073	Stelina Tragaj	Vlorë	BD
1074	Suada Taflaj	Lezhë	PSD
1075	Suelë Daka	Shkodër	BD
1076	Sulejman Broca	Durrës	PBK
1077	Suri Damzi	Lezhë	PLDSH
1078	Tahir Muhedini	Tiranë	PS
1079	Tasim Mehmeti	Vlorë	ABEOK
1080	Tatjana Shehaj	Fier	PBK
1081	Taulant Çekrezi	Tiranë	PLDSH
1082	Taulant Hyka	Durrës	ADR
1083	Taulant Karriqi	Elbasan	ADR
1084	Tea Arapi	Dibër	NTH
1085	Tesial Ibrahimi	Korçë	ABEOK
1086	Teuta Dupi	Tiranë	PSD
1087	Tom Doshi	Tiranë	PSD
1088	Tomorr Dyrmishi	Fier	PBK
1089	Tonin Uldedaj	Shkodër	BD
1090	Trëndafil Alimadhi	Dibër	PBK
1091	Uarda Celami	Tiranë	PSD
1092	Urim Muça	Tiranë	PLDSH
1093	Urjolsa Bardhi	Korçë	BD
1094	Urma Habibasi	Vlorë	ADR PS
1095	Valhona Zakai	Tiranë	PSD
1096	Valbona Zekaj	Tiranë	PLDSH
1097	Valbona Domi	Durrës	BD
1098 1099	Valbona Mezini Valbona Sakollari	Fier Durrës	BD
1100	Valdet Xhaferaj	Vlorë	PSD
1101	Valdet Khaleraj Valdet Gjinali Deralla	Durrës	ABEOK
1101	Valdete Hajdarmetaj	Lezhë	ABEOK
1103	Valentin Marku	Lezhë	ABEOK
1104	Valentina Deda	Dibër	BD
1104	valentina Deda	וטטוט	55

No	Name Surname	Name Surname District Su					
1105	Valentina Ndocaj	Valentina Ndocaj Lezhë					
1106	Valter Hadaj	Gjirokastër	PLDSH				
1107	Valter Baçe	Korçë	PBK				
1108	Vanesa Hysenllari	Tiranë	PBK				
1109	Vanina Këllezi	Tiranë	PBK				
1110	Vasil Sterjovski	Korçë	PS				
1111	Vasil Mama	Berat	ABEOK				
1112	Veiz Goxhaj	Berat	PLDSH				
1113	Veli Hunda	Berat	PLDSH				
1114	Veli Gjishti	Berat	BD				
1115	Vesart Guri	Berat	NTH				
1116	Viktor Goga	Fier	PSD				
1117	Viktor Bezhani	Gjirokastër	ABEOK				
1118	Viola Dalipi	Korçë	PSD				
1119	Violeta Hoxha	Shkodër	PLDSH				
1120	Violeta Hoxha	Tiranë	ABEOK				
1121	Vjola Bami	Tiranë	PBK				
1122	Vjollca Nikolla	Tiranë	PLDSH				
1123	Vjollca Hasi	Shkodër	PBK				
1125	Vjoltim Nabolli Vladimir Malushi	Shkodër Korcë	PLDSH PSD				
1125	Vladimir Malusiii Vladimir Ruci	Fier	ABFOK				
1127	Vladimir Nikolla	Tiranë	ABEOK				
1128	Vlash Kolici	Lezhë	BD				
1129	Voisava Baruti	Durrës	NTH				
1130	Vojsava Bushi	Fier	PSD				
1131	Xhegi Dyrmishi	Shkodër	ADR				
1132	Xhejni Pole	Tiranë	ABEOK				
1133	Xheni Gorana	Durrës	NTH				
1134	Xheni Telah	Tiranë	PLDSH				
1135	Xhenilda Shmidra	NTH					
1136	Xhenis Lulja	Tiranë	PLDSH				
1137	Xhenis Çelaj	Lezhë	ADR				
1138	Xhensila Durbaku	Durrës	PLDSH				
1139	Xhesika Muda	Dibër	PSD				
1140	Xhevahir Vatnikaj	Kukës	ADR				
1141	Xhevdet Rama	Berat	PLDSH				
1142	Xhevrije Sina	Vlorë	PLDSH				
1143	Xhilkë Drizi	Dibër	PLDSH				
1144	Xhoana Çala	Elbasan	PSD				
1145	Xhoi Tarja	Tiranë	PLDSH				
1146	Xhonaldo Elezi	Elbasan	ADR				
1147	Xhonatan Merkaj	Vlorë	PBK				
1148	Xhoni Spaho	Tiranë	ADR				
1149	Xhulian Sulmina	Elbasan	PSD				
1150	Xhulio Toma	Lezhë	PSD				
1151	Xhulio Gjuraj	Lezhë	BD				
1152	Xhulio Tuku Xhumelina Dervishi	Vlorë	ADR				
1153		Tiranë	PBK				
1154	Xhuvana Çela	Berat	BD				
1155 1156	Ylli Zagradi Ylli Saliasi	Fier Durrës	ABEOK				
1157	Ylli Hazizi	Vlorë	PBK				
1158	Ysni Xhelollari	Korcë	ADR ADR				
1159	Zana Loku	Lezhë	ADR NTH				
1160	Zana Tasha	Durrës	PLDSH				
1161	Zana Elezi	Tiranë					
1162	Zef Shtjefni	Shkodër	PBK				
1163	Zejnel Mataj	Kukës	ABEOK PBK				
1164	Zhaneta Haxhillari	Korçë	PBK				
1165		Fier	ADR				
1166	Zoj Ndou	Tiranë	PSD				
	Zogë Muçaj Zoj Ndou						

## FINAL OBSERVATION REPORT

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### CANDIDATES WHO HAVE SUBMITTED A SELF-DECLARATION REPORT WITH 0 INCOME AND EXPENSES

The following table contains the list of 483 candidates who submitted a self-declaration report with 0 income and expenses, ie without any financial activity. In the first column is the name of the candidate, in the second column the District (Electoral Zone) where he / she has run, while in the third column is the subject under whose logo he / she has run. The table is sorted alphabetically by candidate names.

No.	Name Surname	District Subject				
1	Adela Kryeziu	Shkodër	LN			
2	Adelajda Gega	Lezhë	LSI			
3	Adile Gjoka	Gjirokastër	LN			
4	Adlei Lleshi	Tiranë	LN			
5	Adrian Gjoka	Vlorë	LN			
6	Adriana Laze	Tiranë	LRE			
7	Agron Karaj	Tiranë	LSI			
8	Agron Demushi	Kukës	LN			
9	Alban Kokallaj	Vlorë	LRE			
10	Albana Vokshi	Tiranë	PD-PD / AN			
11	Albana Hana	Elbasan	PS			
12	Albana Fusha	Tiranë	LRE			
13	Albert Malaj	Gjirokastër	LSI			
14	Albert Mojsja	Korçë	LN			
15	Alda Gjini	Lezhë	LN			
16	Aldis Aliaj	Durrës	LN			
17	Aldo Gega	Shkodër	PD-PD / AN			
18	Aldo Bumçi	Tiranë	PD-PD / AN			
19	Aldona Koka	Dibër	LN			
20	Aleksander Kyçyku	Korçë	LN			
21	Aleksandër Petre	Korçë	LN			
22	Alert Zhurda	Tiranë	LSI			
23	Alfred Rushaj	Tiranë	PD-PD / AN			
24	Alfred Gega	Korçë	PD-PD / AN			
25	Alfred Alia	Shkodër	LN			
26	Alges Sanxhaku	Tiranë	LN			
27	Algreta Shabani	Lezhë	LSI			
28	Alion Kaloçi	Berat	LN			
29	Alketa Hadëraj	Vlorë	LRE			
30	Allaman Sula	Tiranë	LRE			
31	Alma Malia	Fier	LSI			
32	Altea Karaj	Gjirokastër	LRE			
33	Altin Iljazi	Gjirokastër	LRE			
34	Amarda Gjini	Lezhë	LN			
35	Amarildo Merkaj	Tiranë	LRE			
36	Ana Dhamo	Durrës	PS			
37	Ana Matohiti	Vlorë	LRE			
38	Andrea Simaku	Korçë	PBDNJ-PD / AN			
39	Anduel Tahiraj	Vlorë	PS PS			
40	Anduela Dragoti	Tiranë	LRE			
41	Anduena Elezi	Elbasan	LRE			
42	Anife Brahimi	Vlorë	LN			
43	Anila Gega	Elbasan	LN			
44	Anisa Murataj	Elbasan	LRE			
45	Anthusa Martiko	Durrës	LRE			
46	Anxhela Toska	Berat	LRE			
47	Anxhela Guxholli	Korçë	LRE			
48	Anxhelo Gjonçi	Vlorë	LRE			
49	Arben Ahmetaj	Tiranë	PS			
50	Arben Gjuraj	Shkodër	PD-PD / AN			
- 50	Arberr Ojuraj	STINOUEI	IDID/AN			

No.	Name Surname	District Subject				
51	Arben Tafaj	Tiranë PAA-PD / A				
52	Arben Muçaj Tiranë LS					
53	Arben Vuksani Lezhë Li					
54	Arben Basha	Tiranë	LN			
55	Arber Arifaj	Kukës	LSI			
56	Arbi Agalliu	Vlorë	PD-PD / AN			
57	Ardian Hasalami	Tiranë	LSI			
58	Argita Llani	Dibër	LRE			
59	Arian Galdini	Tiranë	LRE			
60	Arjana Çela	Tiranë	PD-PD / AN			
61	Arjana Hilgega(Demi)	Vlorë	LN			
62	Arjeta Cumani	Fier	LN			
63	Arkend Balla	Durrës	PS			
64	Armand Hoxhallari	Elbasan	LN			
65	Armela Abakay	Tiranë	LN			
66	Arsen Xhediku	Shkodër	LRE			
67	Arsen Demçolli	Tiranë	LRE			
68	Arsen Bardhi	Elbasan	LN			
69	Artan Bitri	Durrës	PS			
70	Artur Topi	Elbasan	LSI			
71	Artur Arshimi	Elbasan	LRE			
72	Ashim Tafilaku	Shkodër	LSI			
73	Asllan Dogjani	Tiranë	PD-PD / AN			
74	Aurel Baku	Berat	LRE			
75	Aurora Mara	Dibër	PS			
76	Aurora Kalemi	Tiranë	LRE			
77	Avni Spaholli	Korçë	LSI			
78	Bardh Spahia	Shkodër	PD-PD / AN			
79	Bardhul Pisha	Elbasan	LN			
80	Bardhyl Mehmeti	Durrës	LN			
81	Berjola Mema	Tiranë	LN			
82	Besa Spaho	Korçë	PS			
83	Besar Murati	Dibër	LN			
84	Besiana Biçaku	Elbasan	LN			
85	Besion Ajazi	Elbasan	PS			
86	Besmir Gropa	Fier	LSI			
87	Besmir Diku	Tiranë	LRE			
88	Besmir Taka	Vlorë	LN			
89	Bledjon Nallbati	Korçë	PD-PD / AN			
90	Blendi Klosi	Berat	PS			
91	Blerta Progonati	Fier	LSI			
92	Borbardha Kaci	Dibër	LSI			
93	Brisida Shehaj	Tiranë	LSI			
94	Brunilda Paskali	Korçë	LSI			
95	Bujar Çela	Fier	PS			
96	Bukuroshe Isufaj	Vlorë	LN			
97	Daniela Kavaja	Tiranë	LN			
98	Danjela Gega	Fier	LRE			
99	Dashamir Tahiri	Vlorë	LRE			
100	Dashnor Sula	Elbasan	PD-PD / AN			

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No.	Name Surname	District Subject				
101	Dashuri Aliaj	Elbasan	LN			
102	Dea Bala	Tiranë	LRE			
103	Dea Shahini	LRE				
104	Dean Dhimitri	Fier	LRE			
105	Ded Ndreca	Lezhë	LSI			
106	Dejvin Hasanaliaj	Vlorë	LRE			
107	Demiana Broli	Durrës	LN			
108	Denis Saatçiu	Berat	PD-PD / AN			
109	Denis Dauti	Vlorë	LRE			
110	Denisa Kele	Fier	LRE			
111	Desilda Jonuzaj	Tiranë	LN			
112	Dhimitraq Lapa	Vlorë	LSI			
113	Dhurata Kola	Dibër	LN			
114	Dhurata Tyli (Çupi)	Dibër	PD-PD / AN			
115	Diana Muriqi	Shkodër	PS			
116	Dila Prenga	Lezhë	LSI			
117	Dod Prenga	Lezhë	LN			
118	Dorina Veliu	Durrës	LRE			
119	Dorina Ahmeti	Gjirokastër	LRE			
120	Dorina Hajdinllari	Korçë	LRE			
121	Doris Myftiu	Tiranë	LN			
122	Dorjan Teliti	Tiranë	PD-PD / AN			
123	Dorjan Likollari	Gjirokastër	LN			
124	Drita Ymeri	Tiranë	LN			
125	Dritan Hila	Durrës	LN			
126	Dylber Dervishi	Elbasan	LSI			
127	Edi Rama	Durrës	PS			
128	Edije Malja	Elbasan	LN			
129	Edisnajd Xhafa	Tiranë	LN			
130	Edlira Bode	Korçë	PS			
131	Edmond Çepele	Fier	PD-PD / AN			
132	Edmond Xhindi	Durrës	LRE			
133	Edmond Sinjari	Berat	LN			
134	Edon Çela	Elbasan	LRE			
135	Eduart Bardhoku					
136	Egliant Tollaku	Korçë	LN			
137	Ejona Mema	Korçë	LRE			
138	Elgerta Kupe	Tiranë	LRE			
139	Elida Elezi	Dibër	LRE			
140	Elida Hoxha	Tiranë	LN			
141	Elinda Nushaj	Vlorë	LRE			
142	Eliona Çaushi	Fier	LN			
143	Elis Uruçi	Elbasan	LRE			
144	Elma Bala	Shkodër	LRE			
145	Elmira Zefi	Shkodër	LSI			
146	Elona Dhima	Tiranë	LSI			
147	Elsa Domi	Kukës	LN			
148	Elsa Sherri	Shkodër	LN			
149	Elsidita Selaj	Shkodër	LSI			
150	Elton Ismaili	Gjirokastër	LSI			
151	Elton Sufa	Durrës	LN			
152	Elvira Elezi	Fier	LRE			
153	Elvis Metani	Shkodër	LSI			
154	Emanuel Bisha					
155	Emiljano Braka	Fier LSI				
156	Emiljano Gjonaj					
157	Emirjan Mekshi	-				
158	Enea Limoni	Korçë				
159	Enea Saliasi	Berat	LN			
160	Eneo Bekteshi	Durrës	LRE			
161	Enis Toçi	Elbasan	LN			
162	Enrik Lato	Vlorë	LRE			
163	Entela Bejdo	Berat	Berat LRE Elbasan LRE			

165         Era Vavla         Berat         LRE           166         Erald Alika         Gjirokastër         LSI           167         Erald Kaja         Tiranë         LSI           168         Erblin Bulica         Kukës         LSI           169         Erdion Muho         Vlorë         LN           170         Ergesa Beqiraj         Vlorë         LRE           171         Ergi Cani         Fier         LN           172         Ergin Cikopana         Korçë         LRE           172         Ergin Cikopana         Korçë         LRE           173         Ergison Basholli         Korçë         LRE           174         Erika Pere         Korçë         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçë         LRE           177         Erion Qurra         Elbasan         LRE           178         Erjada Pëllumbi         Elbasan         LRE           180         Erjola Ndoci         Lezhë         PS           181         Erjon Hamazaj         Fier         LN           182         Erjon Hamazaj         Fier         LN	No.	Name Surname	District Subject					
167         Erald Kaja         Tiranë         LSI           168         Erblin Bulica         Kukês         LSI           169         Erdion Muho         Vlorë         LN           170         Ergesa Beqiraj         Vlorë         LRE           171         Ergia Cani         Fier         LN           172         Ergian Çikopana         Korçë         LSI           173         Ergison Basholli         Korçë         LRE           174         Erika Pere         Korçë         LRE           175         Eriad Rama         Fier         LN           176         Erion Haruni         Korçë         PD-PD/AN           177         Erion Curra         Elbasan         LN           178         Erjada Pëllumbi         Elbasan         LRE           180         Erjola Manoku         Korçë         LRE           181         Erjon Hamzaj         Fier         LRE           182         Erjon Hamzaj         Fier         LRE           183         Erjon Hamzaj         Fier         LN           184         Erlinda Kavaja         Shkodër         LSI           185         Ermal Hasanas         Tiranë         L	165	Era Vavla	Era Vavla Berat LR					
168         Erblin Bulica         Kukës         LSI           169         Erdion Muho         Vlorë         LN           170         Ergesa Beqiraj         Vlorë         LN           171         Ergi Cani         Fier         LN           172         Ergin Cikopana         Korçë         LSI           173         Ergison Basholli         Korçë         LRE           174         Erika Pere         Korçë         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçë         LRE           177         Erion Curra         Elbasan         LN           177         Erion Curra         Elbasan         LRE           179         Erjola Manoku         Korçë         LRE           180         Erjola Manoku         Korçë         LRE           181         Erjon Hamzaj         Fier         LN           181         Erjon Hamzaj         Fier         LRE           182         Erjon Hamzaj         Shkodër         LSI           185         Ermal Hasanas         Tiranë         LRE           186         Ermelinda Dervishi         Elbasan         LRE<		Erald Alika Gjirokastër LS						
169         Erdion Muho         Vlorë         LN           170         Ergesa Beqiraj         Vlorë         LRE           171         Ergis Cani         Fier         LN           172         Ergin Çikopana         Korçë         LSI           173         Ergison Basholli         Korçë         LRE           174         Erika Pere         Korçë         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçë         PD-PD/AN           177         Erion Curra         Elbasan         LN           178         Erjada Pëllumbi         Elbasan         LRE           179         Erjola Manoku         Korçë         LRE           180         Erjola Manoku         Korçë         LRE           181         Erjon Meka         Durrës         PS           182         Erjon Vuka         Fier         LRE           183         Erjon Hamzaj         Fier         LN           184         Erlinda Kavaja         Shkodër         LSI           185         Ermal Hasanas         Tiranë         LSI           186         Ermal Hasanas         Tiranë         LS								
170         Ergesa Beqiraj         Vlorē         LRE           171         Ergi Cani         Fier         LN           172         Ergison Cikopana         Korçê         LSI           173         Ergison Basholli         Korçê         LRE           174         Erika Pere         Korçê         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçê         LRE           177         Erion Curra         Elbasan         LN           178         Erjada Pëllumbi         Elbasan         LRE           179         Erjola Mdoci         Lezhê         PS           180         Erjola Manoku         Korçê         LRE           181         Erjon Adoci         Lezhê         PS           182         Erjon Hamzaj         Fier         LRE           183         Erjon Hamzaj         Fier         LR           184         Erlind Kavaja         Shkodêr         LSI           185         Ermal Hasanas         Tiranë         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat								
171         Ergi Cani         Fier         LN           172         Ergion Çikopana         Korçë         LSI           173         Ergison Basholli         Korçë         LRE           174         Erika Pere         Korçë         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçë         PD-PD/AN           177         Erion Curra         Elbasan         LN           178         Erjada Pëllumbi         Elbasan         LR           179         Erjola Ndoci         Lezhë         PS           180         Erjola Manoku         Korçë         LRE           180         Erjola Manoku         Korçë         LRE           181         Erjon Meka         Durrës         PS           182         Erjon Hamzaj         Fier         LRE           183         Erjon Hamzaj         Fier         LRE           184         Erlinda Kavaja         Shkodër         LSI           185         Ermal Hasanas         Tiranë         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat <td></td> <td></td> <td></td> <td></td>								
172         Ergin Çikopana         Korçē         LSI           173         Ergison Basholli         Korçē         LRE           174         Erika Pere         Korçē         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçē         PP-PP/AN           177         Erion Curra         Elbasan         LRE           179         Erjola Ndoci         Lezhê         PS           180         Erjola Manoku         Korçë         LRE           181         Erjon Meka         Durrês         PS           182         Erjon Hamzaj         Fier         LRE           183         Erjon Hamzaj         Fier         LRE           184         Erlinda Kavaja         Shkodêr         LSI           185         Ermal Hasanas         Tiranê         LRE           186         Ermel Hasanas         Tiranê         LSI           187         Ermid Hasanas         Tiranê         LSI           189         Ervin Salianji         Korçë         PD-PD/AN           188         Ertila Nikolli         Lezhë         LSI           189         Ervin Salianji         Korçë								
173         Ergison Basholli         Korçē         LRE           174         Erika Pere         Korçē         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçē         PD-PD/AN           177         Erion Curra         Elbasan         LN           178         Erjada Pēllumbi         Elbasan         LRE           179         Erjola Ndoci         Lezhē         PS           180         Erjola Manoku         Korçē         LRE           181         Erjon Meka         Durrēs         PS           182         Erjon Vuka         Fier         LRE           183         Erjon Hamzaj         Fier         LN           184         Erlinda Kavaja         Shkodēr         LSI           185         Ermal Hasanas         Tiranē         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat         PP-P/AN           188         Ertila Nikolli         Lezhē         LSI           189         Ervin Salianji         Korçē         PP-PD/AN           180         Ervin Vuka <td< td=""><td></td><td>-</td><td></td><td></td></td<>		-						
174         Erika Pere         Korçë         LRE           175         Erind Rama         Fier         LN           176         Erion Haruni         Korçë         PD-PD/AN           177         Erion Curra         Elbasan         LN           178         Erjola Péllumbi         Elbasan         LRE           179         Erjola Manoku         Korçë         LRE           180         Erjola Manoku         Korçë         LRE           181         Erjon Meka         Durrës         PS           182         Erjon Hamzaj         Fier         LR           183         Erjon Hamzaj         Fier         LN           184         Erlinda Kavaja         Shkodër         LSI           185         Ermal Hasanas         Tiranë         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat         PD-PD/AN           188         Ertila Nikolli         Lezhë         LSI           189         Ervin Salianji         Korçë         PD-PD/AN           190         Ervin Vuka         Fier         LRE           191         Erva Sina         Dur		<u> </u>		_				
175         Erind Rama         Fier         LN           176         Erion Haruni         Korçë         PD-PD / AN           177         Erion Curra         Elbasan         LN           178         Erjada Pëllumbi         Elbasan         LRE           179         Erjola Ndoci         Lezhë         PS           180         Erjola Manoku         Korçë         LRE           181         Erjon Meka         Durrës         PS           182         Erjon Hamzaj         Fier         LRE           183         Erjon Hamzaj         Fier         LRE           184         Erlinda Kavaja         Shkodër         LSI           185         Ermal Hasanas         Tiranë         LRE           186         Ermell Hasanas         Tiranë         LRE           187         Ermal Hasanas         Tiranë         LRE           186         Ermell Hasanas         Tiranë         LRE           187         Ermal Hasanas         Tiranë         LRE           187         Ermal Hasanas         Tiranë         LRE           187         Ermal Hasanas         Tiranë         LSI           189         Ervina Vaka         Fier								
176         Erion Haruni         Korçë         PD-PD/AN           177         Erion Curra         Elbasan         LN           178         Erjada Pēllumbi         Elbasan         LR           179         Erjola Manoku         Korçë         LRE           180         Erjola Manoku         Korçë         LRE           181         Erjon Meka         Durrës         PS           182         Erjon Vuka         Fier         LRE           183         Erjon Hamzaj         Fier         LN           184         Erlinda Kavaja         Shkodër         LSI           185         Ermal Hasanas         Tiranë         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat         PD-PD/AN           188         Ertila Nikolli         Lezhë         LSI           189         Ervin Salianji         Korçë         PD-PD/AN           180         Ervin Vuka         Fier         LRE           191         Ervis Sina         Durrës         LRE           192         Esmeralda Demiraj         Tiranë         LSI           193         Esmeralda Hysenukaj </td <td></td> <td></td> <td></td> <td></td>								
1777         Erion Curra         Elbasan         LN           178         Erjada Péllumbi         Elbasan         LRE           179         Erjola Ndoci         Lezhé         PS           180         Erjola Manoku         Korçê         LRE           181         Erjon Meka         Durrês         PS           182         Erjon Wuka         Fier         LRE           183         Erjon Hamzaj         Fier         LN           184         Erlinda Kavaja         Shkodêr         LSI           185         Ermal Hasanas         Tiranê         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat         PD-PD / AN           188         Ertila Nikolli         Lezhê         LSI           189         Ervin Salianji         Korçê         PD-PD / AN           190         Ervin Vuka         Fier         LRE           191         Ervin Salianji         Korçê         PD-PD / AN           190         Ervin Vuka         Fier         LRE           191         Ervin Salianji         Jurrês         LRE           191         Esmeralda Pysenuka								
178         Erjada Pěllumbi         Elbasan         LRE           179         Erjola Ndoci         Lezhě         PS           180         Erjola Manoku         Korçě         LRE           181         Erjon Meka         Durrës         PS           182         Erjon Wuka         Fier         LRE           183         Erjon Hamzaj         Fier         LRE           184         Erlinda Kavaja         Shkoděr         LSI           185         Ermal Hasanas         Tiraně         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat         PD-PD/AN           188         Ertvila Nikolli         Lezhě         LSI           189         Ervin Salianji         Korçě         PD-PD/AN           190         Ervin Vuka         Fier         LRE           191         Ervis Sina         Durrës         LRE           191         Ervis Sina         Durrës         LRE           192         Esmeralda Demiraj         Tiraně         LSI           193         Esmeralda Demiraj         Durrës         LRE           194         Etnor Krakulli								
180Erjola ManokuKorçëLRE181Erjon MekaDurrësPS182Erjon VukaFierLRE183Erjon HamzajFierLN184Erlinda KavajaShkodërLSI185Ermal HasanasTiranëLRE186Ermelinda DervishiElbasanLRE187Ermira Arizi(Bullari)BeratPD-PD/AN188Ertila NikolliLezhëLSI189Ervin SalianjiKorçëPD-PD/AN190Ervin SalianjiKorçëPD-PD/AN191Ervis SinaDurrësLRE191Ervis SinaDurrësLRE192Esmeralda DemirajTiranëLSI193Esmeralda DemirajTiranëLSI194Etnor KrakulliFierLSI195Eueda MollaLezhëPS196Eugen IsajElbasanLN197Evald SerreqiElbasanLN198Fabiola LleshiShkodërLRE199Fatbardha LataElbasanLRE200Fation VeizajVlorëPD-PD/AN201Fatjon ÇelaFierLN202Fatlinda EleziTiranëLRE203Ferdinant CoboFierPP-PD/AN204Ferdinant XhaferajDurrësLSI205Figirete ÇelajKukësLSI206Fitime ProdaGjirokastërLRE207Fjorela MyrtajFier <td></td> <td>Erjada Pëllumbi</td> <td>Elbasan</td> <td></td>		Erjada Pëllumbi	Elbasan					
181         Erjon Meka         Durrës         PS           182         Erjon Vuka         Fier         LRE           183         Erjon Hamzaj         Fier         LN           184         Erlinda Kavaja         Shkodër         LSI           185         Ermal Hasanas         Tiranë         LRE           186         Ermelinda Dervishi         Elbasan         LRE           187         Ermira Arizi(Bullari)         Berat         PD-PD/AN           188         Ertila Nikolli         Lezhë         LSI           189         Ervin Salianji         Korçë         PD-PD/AN           190         Ervin Salianji         Korçë         PD-PD/AN           191         Ervis Sina         Durrës         LRE           191         Ervis Sina         Durrës         LRE           192         Esmeralda Hysenukaj         Durrës         LRE           193         Esmeralda Hysenukaj         Durrës         LRE           194	179	Erjola Ndoci	Lezhë	PS				
182Erjon VukaFierLRE183Erjon HamzajFierLN184Erlinda KavajaShkodêrLSI185Ermal HasanasTiranêLRE186Ermelinda DervishiElbasanLRE187Ermira Arizi(Bullari)BeratPD-PD/AN188Ertila NikolliLezhêLSI189Ervin SalianjiKorçêPD-PD/AN190Ervin VukaFierLRE191Ervis SinaDurrêsLRE192Esmeralda DemirajTiranêLSI193Esmeralda HysenukajDurrêsLRE194Etnor KrakulliFierLSI195Eueda MollaLezhêPS196Eugen IsajElbasanPD-PD/AN197Evald SerreqiElbasanLN198Fabiola LleshiShkodêrLRE199Fatbardha LataElbasanLR200Fation VeizajVlorêPD-PD/AN201Fatjon ÇelaFierLN202Fatlinda EleziTiranêLRE203Ferdinant ÇoboFierPR-PD/AN204Ferdinant XhaferajDurrêsPD-PD/AN205Fiqirete ÇelajKukêsLSI206Fitime ProdaGjirokastêrLRE207Fjorela MyrtajFierLRE208Flamur HoxhaKukêsPD-PD/AN210Flavia PemaKorçêLN211Fleino MozaliT	180	Erjola Manoku	Korçë	LRE				
183Erjon HamzajFierLN184Erlinda KavajaShkodërLSI185Ermal HasanasTiranëLRE186Ermelinda DervishiElbasanLRE187Ermira Arizi(Bullari)BeratPD-PD/AN188Ertila NikolliLezhëLSI189Ervin SalianjiKorçëPD-PD/AN190Ervin VukaFierLRE191Ervis SinaDurrësLRE191Ervis SinaDurrësLRE192Esmeralda DemirajTiranëLSI193Esmeralda HysenukajDurrësLRE194Etnor KrakulliFierLSI195Eueda MollaLezhëPS196Eugen IsajElbasanPD-PD/AN197Evald SerreqiElbasanLN198Fabiola LleshiShkodërLRE199Fatbardha LataElbasanLRE200Fation VeizajVlorëPD-PD/AN201Fatjon ÇelaFierLN202Fatlinda EleziTiranëLRE203Ferdinant ÇoboFierPR-PD/AN204Ferdinant XhaferajDurrësPD-PD/AN205Fiqirete ÇelajKukësLSI206Fitime ProdaGjirokastërLRE207Fjorela MyrtajFierLRE208Flavia PemaKorçëLN210Flavia PemaKorçëLN211Fleino MozaliTiran	181	Erjon Meka	Durrës	PS				
184Erlinda KavajaShkodërLSI185Ermal HasanasTiranëLRE186Ermelinda DervishiElbasanLRE187Ermira Arizi(Bullari)BeratPD-PD/AN188Ertila NikolliLezhëLSI189Ervin SalianjiKorçëPD-PD/AN190Ervin VukaFierLRE191Ervis SinaDurrësLRE192Esmeralda DemirajTiranëLSI193Esmeralda HysenukajDurrësLRE194Etnor KrakulliFierLSI195Eueda MollaLezhëPS196Eugen IsajElbasanLN197Evald SerreqiElbasanLN198Fabiola LleshiShkodërLRE199Fatbardha LataElbasanLRE200Fation VeizajVlorëPD-PD/AN201Fatjon ÇelaFierLN202Fatlinda EleziTiranëLRE203Ferdinant CoboFierPR-PD/AN204Ferdinant XhaferajDurrësPD-PD/AN205Fiqirete ÇelajKukësLSI206Fitime ProdaGjirokastërLRE207Fjorela MyrtajFierLRE208Flamur HoxhaKukësPD-PD/AN209Flavia PemaKorçëLN210Flavio PjetriDibërLN211Fleino MozaliTiranëLN212Florian Pilumbi <t< td=""><td></td><td>Erjon Vuka</td><td>Fier</td><td></td></t<>		Erjon Vuka	Fier					
185Ermal HasanasTiranéLRE186Ermelinda DervishiElbasanLRE187Ermira Arizi(Bullari)BeratPD-PD/AN188Ertila NikolliLezhéLSI189Ervin SalianjiKorçêPD-PD/AN190Ervin VukaFierLRE191Ervis SinaDurrësLRE192Esmeralda DemirajTiranéLSI193Esmeralda HysenukajDurrësLRE194Etnor KrakulliFierLSI195Eueda MollaLezhèPS196Eugen IsajElbasanPD-PD/AN197Evald SerreqiElbasanLN198Fabiola LleshiShkodèrLRE199Fatbardha LataElbasanLRE200Fation VeizajVlorèPD-PD/AN201Fatjon ÇelaFierLN202Fatlinda EleziTiranèLRE203Ferdinant ÇoboFierPR-PD/AN204Ferdinant XhaferajDurrèsPD-PD/AN205Figirete ÇelajKukèsLSI206Fitime ProdaGjirokastèrLRE207Fjorela MyrtajFierLRE208Flamur HoxhaKukèsPD-PD/AN209Flavia PemaKorçèLN210Flavio PjetriDibèrLN211Fleino MozaliTiranèLN212Florian RasaDurrèsLRE213Florian Pilumbi <td></td> <td></td> <td></td> <td></td>								
186Ermelinda DervishiElbasanLRE187Ermira Arizi(Bullari)BeratPD-PD/AN188Ertila NikolliLezhëLSI189Ervin SalianjiKorçëPD-PD/AN190Ervin VukaFierLRE191Ervis SinaDurrësLRE192Esmeralda DemirajTiranëLSI193Esmeralda HysenukajDurrësLRE194Etnor KrakulliFierLSI195Eueda MollaLezhëPS196Eugen IsajElbasanPD-PD/AN197Evald SerreqiElbasanLN198Fabiola LleshiShkodërLRE199Fatbardha LataElbasanLRE200Fation VeizajVlorëPD-PD/AN201Fatjon ÇelaFierLN202Fatlinda EleziTiranëLRE203Ferdinant ÇoboFierPR-PD/AN204Ferdinant XhaferajDurrësPD-PD/AN205Fiqirete ÇelajKukësLSI206Fitime ProdaGjirokastërLRE207Fjorela MyrtajFierLRE208Flamur HoxhaKukësPD-PD/AN209Flavia PemaKorçëLN210Flavio PjetriDibërLN211Fleino MozaliTiranëLN212Florian MirakaTiranëLRE213Florian PilumbiLezhëLN214Florjan Miraka <td></td> <td>-</td> <td></td> <td></td>		-						
187Ermira Arizi(Bullari)BeratPD-PD/AN188Ertila NikolliLezhëLSI189Ervin SalianjiKorçëPD-PD/AN190Ervin VukaFierLRE191Ervis SinaDurrësLRE192Esmeralda DemirajTiranëLSI193Esmeralda HysenukajDurrësLRE194Etnor KrakulliFierLSI195Eueda MollaLezhëPS196Eugen IsajElbasanPD-PD/AN197Evald SerreqiElbasanLN198Fabiola LleshiShkodërLRE199Fatbardha LataElbasanLRE200Fation VeizajVlorëPD-PD/AN201Fatjon ÇelaFierLN202Fatlinda EleziTiranëLRE203Ferdinant ÇoboFierPR-PD/AN204Ferdinant XhaferajDurrësPD-PD/AN205Fiqirete ÇelajKukësLSI206Fitime ProdaGjirokastërLRE207Fjorela MyrtajFierLRE208Flamur HoxhaKukësPD-PD/AN209Flavia PemaKorçëLN210Flavio PjetriDibërLN211Fleino MozaliTiranëLN212Florian KasaDurrësLRE213Florian PllumbiLezhëLN214Florjan MirakaTiranëLN215Francesca MemiaD								
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207         Fjorela Myrtaj         Fier         LRE           208         Flamur Hoxha         Kukës         PD-PD/AN           209         Flavia Pema         Korçë         LN           210         Flavio Pjetri         Dibër         LN           211         Fleino Mozali         Tiranë         LN           212         Florian Kasa         Durrës         LRE           213         Florian Pllumbi         Lezhë         LN           214         Florjan Miraka         Tiranë         LRE           215         Flutura Açka         Elbasan         PD-PD/AN           216         Francesca Memia         Durrës         LN           217         Franko Hakilja         Elbasan         LSI           218         Freskida Çako         Gjirokastër         LSI           219         Galip Arapi         Fier         LN           220         Gazment Bardhi         Elbasan         PD-PD/AN           221         Gazmir Tahiri         Durrës         LSI           222         Genadi Mero         Tiranë         LN           223         Genci Sulejmani         Vlorë         LN           224         Gent Sinani								
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224 Gent Sinani Tiranë LRE								
226 Gentian Halilaj Vlorë LRE								
227 Gentian Ndoj Tiranë LN		-						
228 Gentjan Muça Tiranë PD-PD / AN								

### **FINAL OBSERVATION REPORT**

SEPTEMBER 2020 - JANUARY 2022



No.	Name Surname District Subje				
229	Gerti Meçaj	Vlorë	LN		
230	Gëzim Mëhilli	Vlorë	LRE		
231	Gjergji Mano	Vlorë	LSI		
232	Gjon Ndoci	Lezhë	PS		
233	Gjon Ndoj	Lezhë	LN		
234	Gjovalin Kastrati	Shkodër	LN		
235	Gladiola Çala	Elbasan	PD-PD / AN		
236	Grida Duma	Tiranë	PD-PD / AN		
237 238	Griselda Xhika Halit Valteri	Fier Tiranë	LN PS		
239	Helidon Bushati	Shkodër	PD-PD / AN		
240	Hilmi Halilaj	Tiranë	LRE		
241	Hysni Caca	Durrës	LSI		
242	Igli Delija	Fier	LRE		
243	Ilir Topi	Korçë	PS		
244	Ilir Oboni	Berat	LSI		
245	Ilir Hysi	Vlorë	LSI		
246	Ilmi Kuka	Lezhë	LRE		
247	Ina Zhupa	Vlorë	PD-PD / AN		
248	Indrit Hajdini	Lezhë	LRE		
249	Irena Jano	Korçë	LN		
250	Irisa Karaj	Korçë	LN		
251	Irma Damjani	Tiranë	LRE		
252 253	Ismeralda Seidolli Ismet Begiraj	Korçë Fier	LSI PS		
253	Isuf Çelaj	Kukës	PD-PD / AN		
255	Iva Çarçiu	Tiranë	LSI		
256	lvi Kaso	Tiranë	PD-PD / AN		
257	Jalldyz Kastrati	Shkodër	LSI		
258	Jonida Dauti	Tiranë	LRE		
259	Joniz Osmanagaj	Tiranë	LN		
260	Jorgji Karaj	Shkodër	LRE		
261	Jorgo Papa	Gjirokastër	LRE		
262	Jorida Tabaku	Tabaku Tiranë PD-P			
263	Jozefina Topalli	Tiranë	LN		
264	Julian Demçolli	Elbasan	LRE		
265	Jurgen Drrasati	Shkodër	LN		
266	Jurgen Hoxha	Tiranë	LN		
267 268	Jurgis Çyrbja Juri Gjermeni	Durrës Tiranë	PS LRE		
269	Kasëm Mahmutai	Berat	PD-PD / AN		
270	Kastriot Piroli	Lezhë	PD-PD / AN		
271	Katerina Karaj	Elbasan	LRE		
272	Keida Bejaj	Durrës	PS		
273	Kejdi Alushaj	Fier	LN		
274	Kejsi Kërçyku	Tiranë	LRE		
275	Keti Curani(Koçi)	Durrës	LN		
276	Kim Kurti	Tiranë	LN		
277	Klajda Koçiu	Fier	LRE		
278	Klajdi Qama	Berat	PS		
279	Klajdi Bogdanaj				
280	Klaudia Krasnika	Elbasan LSI			
281			LRE		
282 283	Klaudia Muço	Korçë	LN PS		
283			LN		
285	Klevis Sota				
286	Klevis Pali	Elbasan	LN		
287	Klevis Maze				
288	Klodiana Spahiu				
289	Klonard Plaku	Tiranë	LRE		
290	Korab Koka	Kukës	LRE		
291	Kozeta Muçaj Elbasan LR				
20.	Krenar Gjonzeneli				

No.	Name Surname	District Subject						
293	Kreshnik Çollaku	Dibër	PD-PD / AN					
294	Kristi Skenderaj	Berat LN						
295	Kristian Shkreli Shkodër PS							
296	Kristina Kasa Lezhë LRI							
297	Kristina Nano	Vlorë	LRE					
298	Laura Ferati	Vlorë	PS					
299	Ledjan Hasanaj	Durrës	LRE					
300	Lefter Maliqi	Berat	LSI					
301	Lefter Gështenja	Elbasan	PD-PD / AN					
302	Leke Negri	Tiranë	LN					
303	Lemi Muçaj	Tiranë	LSI					
304 305	Leonard Doda Leonard Lushi	Elbasan Tiranë	LRE LRE					
306	Leonard Lushi	Fier	LRE					
307	Leonora Shoti	Kukës	LRE					
308	Lina Guri	Lezhë	PS					
309	Lindita Buxheli	Fier	PS					
310	Lindita Metaliai	Lezhë	PD-PD / AN					
311	Lorena Kapllani	Gjirokastër	LN					
312	Lorenc Aleksi	Durrës	LN					
313	Lorenc Radovani	Tiranë	LN					
314	Lorenc Spata	Tiranë	LN					
315	Lorna Lelçaj	Tiranë	LN					
316	Luan Duzha	Elbasan	PS					
317	Luan Baçi	Fier	PD-PD / AN					
318	Luçiano Boçi	Elbasan	PD-PD / AN					
319	Luçiano Bendo	Fier	LRE					
320	Luisida Muho	Fier	LSI					
321	Luljan Strazimiri	Tiranë	LRE					
322	Luljeta Bozo	Tiranë	PS PD / AN					
323 324	Lulzim Basha Malvina Lleshi	Tiranë	PD-PD / AN					
325	Manjola Ndreca	Durrës Shkodër	LN					
326	Manuel Sefa	Elbasan	LRE LN					
327	Manushage Porja	Lezhë	LRE					
328	Mariglen Hoxha	Tiranë	LRE					
329	Maringlen Shehaj	Fier	LSI					
330	Mario Lelo	Durrës	LN					
331	Marisa Ndreko	Durrës	LN					
332	Marjeta Biba	Korçë	LSI					
333	Marjo Qama	Tiranë	LRE					
334	Marsel Javori	Fier	LRE					
335	Marsel Nelko	Fier	LN					
336	Marsika Metra	Dibër	LRE					
337	Matilda Gjini	Lezhë	LN					
338	Megi Tirana	Durrës	LN					
339	Melisa Brojaj	Shkodër	LSI					
340 341	Melisa Braci Melsed Dervishai	Shkodër Tiranë	LN LRE					
342	Meri Lalaj	Tiranë	LN					
343	Merita Bakiu	Durrës	PD-PD / AN					
344	Merita Velaj	Fier	LRE					
345	Mersi Shehu	Tiranë	LRE					
346	Mevlan Karaj	Dibër	LRE					
347	Mexhite Tahiri	Gjirokastër	LN					
348	Migena Idrizaj	Fier						
349	Migena Bala	Fier	LN					
350	Mikel Visha	Fier	LN					
351	Mikeliano Harka	Berat	LN					
352	Mimi Kodheli	Tiranë	PS					
353	Mimoza Trimi	Elbasan	LSI					
354	Mir Lukani	Shkodër	LRE					
355	Miranda Haxhia	Berat	LN					
356	Mirela Pitushi	i Fier PS						



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### ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

No.	Name Surname	District	Subject		
357	Mirjan Bicukaj	Shkodër	LRE		
358	Muharem Gega Durrës LRE				
359	Najada Çomo	Tiranë	PS		
360	Najada Halilosmani(Selmani)	Fier	LN		
361	Nard Ndoka	Shkodër	PDK-PD / AN		
362	Ndue Shpendaj	Shkodër	LRE		
363	Neada Stana	Dibër	LN		
364	Neida Idrizaj	Vlorë	LN		
365	Nertila Demiri	Fier	LRE		
366	Nest Zefi Nikoleta Peti	Shkodër	LN LSI		
367 368	Nora Malaj	Tiranë Tiranë	LSI		
369	Nora Malaj	Shkodër	LN		
370	Odeta Marini	Tiranë	LN		
371	Ogerta Paci	Berat	LN		
372	Olta Xhacka	Korçë	PS		
373	Olta Elezi	Shkodër	LRE		
374	Orjola Pampuri	Tiranë	PD-PD / AN		
375	Orjon Rroji	Shkodër	LN		
376	Orlind Morina	Kukës	LN		
377	Pandi Jani	Korçë	LSI		
378	Paulin Sterkaj	Shkodër	PS		
379	Pëllumb Shahini	Tiranë	LRE		
380	Përparim Demi	Elbasan	LRE		
381	Petrika Mele	Korçë	LSI		
382	Petrit Sinaj	Berat	LSI		
383	Petrit Gjoni	Lezhë	LSI		
384	Petrit Vasili	Tiranë	LSI		
385	Petrit Bara	Tiranë	LSI		
386	Petrit Tanushi	Shkodër	LRE		
387 388	Petro Koçi	Fier	PS LN		
389	Polikron Pulluqi Poliksena Laraku	Tiranë Korçë	LRE		
390	Qamile Resulai	Fier	LN		
391	Qani Xhafa	Elbasan	PD-PD / AN		
392	Rabushe Hoxha	Berat	PS		
393	Ravena Aleksi	Tiranë	LN		
394	Rei Tenolli	Tiranë	LN		
395	Renaldo Rama	Gjirokastër	LN		
396	Renaldo Lalaj	Tiranë	LN		
397	Renato Bezati	Fier	LRE		
398	Renato Gërdeci	Tiranë	LN		
399	Retilda Musa	Berat	LN		
400	Rexhina Leka	Durrës	LSI		
401	Rezart Laraku	Korçë	LRE		
402	Rigest Lusha	Gjirokastër	LRE		
403	Rikeldo Ndreu	Gjirokastër	LN		
404	Robena Çitozi	Durrës	LN		
405 406	Robert Çitozi Romina Kuko	Tiranë	LN PS		
406	Rudina Musaraj	Tiranë Lezhë	LRE		
407	Safije Tabaku	Elbasan	LRE		
409	Saimir Hasalla	Elbasan	PS		
410	Saimir Mazelli	Korçë	LRE		
411	Sali Shehu	Tiranë	FRD-PD / AN		
412	Sandra Xheleshi	Dibër	LN		
413	Sandri Bajraktari	Korçë	LRE		
414	Santjola Hasanaj	Tiranë	LN		
415	Sara Satka	Berat	PS		
416	Sara Kau	Tiranë	LSI		
417	Sara Mersini	Fier	LRE		
418	Sara Hodaj	Tiranë	LRE		
419	Sariola Janko	Fier	LSI		
420	Seladin Jakupllari	Korçë	PD-PD / AN		

No.	Name Surname	District Subject			
421	Selim Balla	Tiranë LN			
422	Sergei Ndreu	Fier LN			
423 424	Sheila Hazna Shkëlgim Bullari	Korçë Elbasan	LN PS		
424	Shkëlqim Tafa	Berat	LSI		
426	Shpetim Puca	Dibër	LRE		
427	Shpetim Lala	Tiranë	LRE		
428	Shpëtim Axhani	Fier	PLL-PD / AN		
429	Shpresa Marnoj	Lezhë	PS		
430	Shpresa Muçaj	Fier	LN		
431	Silva Hasaj	Fier	FRD-PD / AN		
432	Sindi Laloshi	Elbasan	LSI		
433	Sindi Qafleshi	Elbasan	LSI		
434	Sindi Gostivari	Durrës	LRE		
435	Soela Myrtollari	Korçë	PD-PD / AN		
436	Sokol Krasniqi	Fier	PS		
437	Sokol Skura	Elbasan	LSI		
438	Sokol Ponari	Tiranë	LSI		
439	Sokol Mezini	Tiranë	LN		
440	Sonila Kikrri	Durrës	LRE		
441 442	Sonila Çela Sorina Koti	Fier	PD-PD / AN		
442	Sotir Zarka	Korçë Fier			
444	Stefan Pogu	Durrës	LSI LN		
445	Stela Jakova	Tiranë	LN		
446	Suela Dinellari	Korçë	LSI		
447	Suzana Nikshiqi	Lezhë	LRE		
448	Tatiana Piro	Fier	PS		
449	Taulanda Jupi	Tiranë	PD-PD / AN		
450	Tea Ndrio	Tiranë	LRE		
451	Teuta Hoti	Shkodër	LN		
452	Thanas Poçi	Korçë	LSI		
453	Thoma Papadhimitri	Tiranë	LRE		
454	Tomor Alizoti	Berat	PD-PD / AN		
455	Tomorr Laze	Berat	LRE		
456	Tonin Trupi	Fier	LN		
457	Tonin Valca	Lezhë	LN		
458	Tritan Shehu	Gjirokastër	PD-PD / AN		
459	Valentina Halili	Elbasan	LN		
460	Vangjel Dule	Tiranë	PBDNJ-PD / AN		
461	Vangjel Anagnosti	Vlorë	PBDNJ-PD / AN		
462	Vangjel Buda	Berat	LRE		
463 464	Viktor Tushaj Viktor Përleka	Lezhë Lezhë	LSI LRE		
465	Vilma Gjika	Berat	LRE		
466	Vilma Zegir	Korçë	LN		
467	Vilson Lulja	Fier	LRE		
468	Violeta Bonaj	Tiranë	LRE		
469	Visar Erkoçi	Shkodër	LN		
470	Xhavit Nasufi	Tiranë	LRE		
471	Xhelal Çiku	Lezhë	LRE		
472	Xhelal Mziu	Dibër	PD-PD / AN		
473	Xheni Vogli	Durrës	LRE		
474	Xheni Hoxha	Berat	LN		
475	Xhenis Jano	Korçë	LN		
476	Xhensila Ndreu	Dibër	LRE		
477	Xhoi Laraku	Korçë	LRE		
478	Xhorxhi Foto	Vlorë	LN		
479	Xhulio Xhindi	Berat	LRE		
480	Ylber Valteri	Tiranë			
481	Zef Gjoka	Lezhë	PD-PD / AN		
482	Zeliko Shimi	Shkodër	LRE		
483	Zheni Gjergji				
	, 3,				

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022





### FUNDS SPENT AND DECLARED BY ELECTORAL SUBJECTS AND MEDIA CANDIDATES

### Annex T - Table T-1 - Amounts spent and declared for the media by electoral subjects

The following table contains an overview of the statements and an estimate of the expenses of the electoral subjects for the media. This table includes only entities that have declared in their self-declaration reports media expenditures. (PDIU, PD, FRD, PR, LN, BD, PS, LSI, NTH, PSD, PBK, PLR, PAA, ADK and independent candidate Pal Shkambi). Specifically the first column contains the name of the subject. The second group column contains the declarations of the subject itself (Paid media, according to the declaration of the electoral subject and the amount declared as spent). The third group-column contains the data on the basis of which the calculation of the amount actually spent is performed. More specifically: Media where advertisement was broadcast according to AMA monitoring, Time in minutes of advertisement broadcast on that media according to AMA, Average tariff applied by television for advertising (in Lekë / sec) based on tariffs submitted by the media and published on the CEC website, as well as the calculation of the amount paid. In the column of the average tariff, the marking with n / a, means that the respective media did not send to the CEC the tariffs that it applies for advertising during the campaign, therefore, the calculation of the respective amount spent has not been done. "

		DECLARATI Electorai		CALCULATIONS FROM THE MONITORING OF THE BROADCAST ADVERTISEMENT			
No	Subject	Paid media, declared by the subject	Amount declared as spent	Media where an advertisement was broadcast for the subject according to AMA	Time of broadcast advertisement in the media for the subject according to AMAs (in minutes)	Average tariff applied by TV for advertising (ALL / sec)	Calculation of the amount spent on broadcasting the advertisment
1	PDIU	TV Gold	60,000				
2	PDIU	Syri TV	456,568	Syri TV	23.48	n/a	0
3	PDIU	Abc News	3,000,000			5,500	0
4	PDIU	News 24	369,420			2,400	0
5	PDIU			Ora News	0.50	1,900	57,000
	SubTotal		3,885,988				57,000
1	DP	Tv Klan	3,914,262	Tv Klan	257.00	5,500	84,810,000
2	DP	ORA. SH.A	1,298,659	ORA. SH.A	10.17	1,900	1,159,380
3	DP	Euro News	1,305,178	Euro News	112.48	5,000	33,744,000
4	DP	Channel One	1,304,330	Channel One		1,900	0
5	DP	Fax News	1,957,502	Fax News	176.00	1,600	16,896,000
6	DP	Media Vizion	1,303,800	Media Vizion	57.98	2,000	6,957,600
7	DP	Syri TV	1,303,800	Syri TV	222.90	n/a	0
8	DP	Top Channel	6,148,499	Top Channel	176.02	2,000	21,122,400
9	DP	Abc News	1,305,284	Abc News	134.32	5,500	44,325,600
10	DP	A2 CNN	723,310	A2 CNN	100.17	1,000	6,010,200
11	DP			Real TV	73.13	n/a	0
12	DP			TV1 Channel	100.85	n/a	0
13	DP			6+1 Vlora	214.43	n/a	0
14	DP			Klan Plus	283.55	1,200	20,415,600
15	DP			Klan News	226.47	1,200	16,305,840
16	DP			Report TV	0.13	3,000	23,400
17	DP			News 24	132.15	2,400	19,029,600
18	DP			TV Best	62.33	n/a	0
19	DP			Shijak TV	161.98	n/a	0
20	DP			Scan Tv	87.67	n/a	0
21	DP			Apollon	30.90	n/a	0
22	DP			RTV Gjirokastra	27.58	n/a	0

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

No		DECLARATION OF THE CALCULATIONS FROM THE MONITORING						
24	No	Subject	Paid media, declared by the	Amount declared as	advertisement was broadcast for the subject	Time of broadcast advertisement in the media for the subject according to AMAs (in	Average tariff applied by TV for advertising	Calculation of the amount spent on broadcasting the advertisment
DP	23	DP			Kopliku	25.08	n/a	0
Antena Nord	24	DP			Kanali 7	25.03	n/a	0
27	25	DP			Belsh	21.50	n/a	0
Alpo Tv   2.95   n/a   0	26	DP			Antena Nord	4.00	n/a	0
DP	27	DP			Sot 7	25.41	n/a	0
SubTotal   SubTotal   Sis,425	28	DP			Alpo Tv	2.95	n/a	0
SI	29	DP			Rozafa Tv	27.00	n/a	0
SubTotal   SubTotal	30	DP			RTV Ora	147.75	2,400	21,276,000
SubTotal	31	DP			MCN Tv	4.00	1,000	240,000
Ty Klan	32	DP			Bulqiza TV	1.23	n/a	0
2 RP Top Channel 1,060,000 Top Channel 2,000 0  SubTotal 2,555,000 0  1 FRD Syri TV 130,507 0.00 0  SubTotal 130,507 0.00 0  1 LN TV Klan 515,425 TV Klan 2,60 5,500 858,000  2 LN TVI Channel 87,00 n/a 0  3 LN 6+1 Vlora 206,05 n/a 0  LN Report TV 64,10 3,000 1,538,000  SubTotal 515,425 TV Klan 14,45 5,500 4,768,500  2 BD AZ CNN 522,113 AZ CNN 53,75 1,000 3,225,000  4 BD Redia Vizion 391,140 Media Vizion 20,45 2,000 2,454,000  4 BD Report TV 45,15 3,000 8,127,000  5 BD Report TV 85,15 3,000 8,127,000  7 BD Report TV 85,15 3,000 8,127,000  7 BD TV Best 26,42 n/a 0  9 BD TV Klan 12,713,686 TV Klan 300,60 5,500 9,188,000  1 SP Fax News 6,000,000 Fax News 42,98 1,600 4,126,080  4 SP Report TV 7,000,000 Report TV 249,67 3,000 44,940,600  5 SP Media Vizion 4,000,000 Media Vizion 19,912 2,000 23,894,400  6 SP Euro News 3,000,000 Fax News 175,67 5,500 3,5500 5,7971,100  8 SP FAX News 530,000 Media Vizion 19,912 2,000 23,894,400  6 SP Euro News 3,000,000 Fax News 175,67 5,500 5,7971,100  8 SP SP Media Vizion 4,000,000 Media Vizion 19,912 2,000 23,894,400  6 SP Euro News 3,000,000 Fax News 175,67 5,500 5,7971,100  8 SP SP Media Vizion 4,000,000 Media Vizion 19,912 2,000 23,894,400  10 SP Klan Plus 260,000 1,200 18,720,000  11 SP Klan News 289,65 1,200 20,848,800  12 SP Gore TV Vlora 502,77 n/a 0  Neés 24 234,60 2,400 33,782,400		SubTotal		20,564,624				292,315,620
SubTotal	1	RP	Tv Klan	1,495,000	Tv Klan		5,500	0
SubTotal   Syri TV   130,507	2	RP	Top Channel	1,060,000	Top Channel		2,000	0
TRD					Syri TV	11.50	n/a	0
SubTotal		SubTotal		2,555,000				0
SubTotal	1	FRD	Syri TV	130,507				0
1         LN         Tv Klan         515,425         Tv Klan         2.60         5,500         858,000           2         LN         TVI Channel         87.00         n/a         0           3         LN         6+1 Vlora         206.05         n/a         0           4         LN         Report TV         64.10         3,000         11,538,000           1         BD         Tv Klan         824,000         Tv Klan         14.45         5,500         4,768,500           2         BD         A2 CNN         52,113         A2 CNN         53.75         1,000         3,225,000            3         BD         Media Vizion         391,140         Media Vizion         20.45         2,000         2,454,000           4         BD         Real TV         702,30         n/a         0         0           5         BD         G+1 Vlora         19.83         n/a         0         0           6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         TV Klan         12,713,686         TV Klan		SubTotal	-	130,507		0.00		0
2	1	LN	Tv Klan	-	Tv Klan	2.60	5,500	858,000
3	2	LN		,	TV1 Channel	87.00	n/a	0
4         LN         Report TV         64.10         3,000         11,538,000           SubTotal         515,425         12,396,000           1         BD         Tv Klan         824,000         Tv Klan         14.45         5,500         4,768,500           2         BD         A2 CNN         522,113         A2 CNN         53.75         1,000         3,225,000           3         BD         Media Vizion         391,140         Media Vizion         20.45         2,000         2,454,000           4         BD         Real TV         702,30         n/a         0         0           5         BD         6+1 Vlora         19.83         n/a         0         0           6         BD         Report TV         45.15         3,000         8,127,000         0           7         BD         TV Best         26.42         n/a         0         0           8         BD         Kanali 7         24.40         n/a         0         0           9         BD         TV Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05								
SubTotal         515,425         12,396,000           1         BD         Tv Klan         824,000         Tv Klan         14.45         5,500         4,768,500           2         BD         A2 CNN         522,113         A2 CNN         53.75         1,000         3,225,000           3         BD         Media Vizion         391,140         Media Vizion         20.45         2,000         2,454,000           4         BD         Real TV         702.30         n/a         0           5         BD         G+1 Vlora         19.83         n/a         0           6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           SubTotal         12,737,253         19,522,980         19,522,980           1         SP         Tv Klan         12,000,000         To Channel         288.05         2,000         34,566,000           3         S	4	LN			Report TV	64.10		11,538,000
1         BD         Tv Klan         824,000         Tv Klan         14.45         5,500         4,768,500           2         BD         A2 CNN         522,113         A2 CNN         53.75         1,000         3,225,000           3         BD         Media Vizion         391,140         Media Vizion         20.45         2,000         2,454,000           4         BD         Real TV         702.30         n/a         0           5         BD         6+1 Vlora         19.83         n/a         0           6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           SubTotal         1,737,253         19,522,980         19,522,980           1         SP         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000				515.425	- 1		-,	
2         BD         A2 CNN         522,113         A2 CNN         53.75         1,000         3,225,000           3         BD         Media Vizion         391,140         Media Vizion         20.45         2,000         2,454,000           4         BD         Real TV         702.30         n/a         0           5         BD         6+1 Vlora         19.83         n/a         0           6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           SubTotal         1,737,253         19,522,980         19,900         948,480           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98<	1	BD	Tv Klan	-	Tv Klan	14.45	5,500	
3         BD         Media Vizion         391,140         Media Vizion         20.45         2,000         2,454,000           4         BD         Real TV         702.30         n/a         0           5         BD         6+1 Vlora         19.83         n/a         0           6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           SubTotal         1,737,253         19,522,980         19,522,980           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67	2	BD	A2 CNN	-	A2 CNN	53.75	1.000	
4         BD         Real TV         702.30         n/a         0           5         BD         6+1 Vlora         19.83         n/a         0           6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           1         Sp         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News<	3	BD	Media Vizion		Media Vizion	20.45	2,000	
5         BD         6+1 Vlora         19.83         n/a         0           6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000	4	BD			Real TV	702.30	n/a	0
6         BD         Report TV         45.15         3,000         8,127,000           7         BD         TV Best         26.42         n/a         0           8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           SubTotal         1,737,253         19,522,980         19,522,980           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,500         57,971,100           8<	5	BD			6+1 Vlora	19.83		0
8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           SubTotal         1,737,253         19,522,980           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0 <td>6</td> <td>BD</td> <td></td> <td></td> <td>Report TV</td> <td>45.15</td> <td></td> <td>8,127,000</td>	6	BD			Report TV	45.15		8,127,000
8         BD         Kanali 7         24.40         n/a         0           9         BD         Ora News         8.32         1,900         948,480           SubTotal         1,737,253         19,522,980           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0 <td></td> <td></td> <td></td> <td></td> <td>·</td> <td></td> <td><u> </u></td> <td></td>					·		<u> </u>	
9         BD         Ora News         8.32         1,900         948,480           SubTotal         1,737,253         19,522,980           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000<	8							
SubTotal         1,737,253         19,522,980           1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         Klan News         289.65	9	BD			Ora News	8.32	-	948.480
1         SP         Tv Klan         12,713,686         Tv Klan         300.60         5,500         99,198,000           2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         G+1 Vlora         230.68         n/a         0           11         SP         Klan News         2				1,737,253				19,522,980
2         SP         Top Channel         12,000,000         Top Channel         288.05         2,000         34,566,000           3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0 </td <td>1</td> <td></td> <td>Tv Klan</td> <td></td> <td>Tv Klan</td> <td>300.60</td> <td>5,500</td> <td>99,198,000</td>	1		Tv Klan		Tv Klan	300.60	5,500	99,198,000
3         SP         Fax News         6,000,000         Fax News         42.98         1,600         4,126,080           4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400								34,566,000
4         SP         Report TV         7,000,000         Report TV         249.67         3,000         44,940,600           5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400	3	SP	Fax News	6,000,000	Fax News	42.98	1,600	4,126,080
5         SP         Media Vizion         4,000,000         Media Vizion         199.12         2,000         23,894,400           6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400				7,000,000		249.67	3,000	44,940,600
6         SP         Euro News         3,000,000         Euro News         151.70         5,000         45,510,000           7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400	5	SP	Media Vizion	4,000,000	Media Vizion		2,000	23,894,400
7         SP         Abc News         530,000         Abc News         175.67         5,500         57,971,100           8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400								45,510,000
8         SP         Real TV         210.30         n/a         0           9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400								57,971,100
9         SP         Klan Plus         260.00         1,200         18,720,000           10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400								
10         SP         6+1 Vlora         230.68         n/a         0           11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400								18,720,000
11         SP         Klan News         289.65         1,200         20,854,800           12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400								
12         SP         One Tv Vlora         502.77         n/a         0           13         SP         Neës 24         234.60         2,400         33,782,400								
13 SP Neës 24 234.60 2,400 33,782,400								
	14	SP			RTV Ora	52.95	2,400	7,624,800
							•	2,988,720

## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

COALITION FOR REFORMS, INTEGRATION AND CONSOLIDATED INSTITUTIONS (KRIIK ALBANIA)

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DECLARATION OF THE Electoral Subject				CALCULATIONS FROM THE MONITORING OF THE BROADCAST ADVERTISEMENT				
No	Subject	Paid media, declared by the subject	Amount declared as spent	Media where an advertisement was broadcast for the subject according to AMA	Time of broadcast advertisement in the media for the subject according to AMAs (in minutes)	Average tariff applied by TV for advertising (ALL / sec)	Calculation of the amount spent on broadcasting the advertisment	
16	SP			TV Best	91.62	n/a	0	
17	SP			Scan Tv	44.22	n/a	0	
18	SP			Apollon TV	15.10	n/a	0	
19	SP			RTV Gjirokastra	38.67	n/a	0	
20	SP			Tv Kopliku	21.77	n/a	0	
21	SP			Kanali 7	3.30	n/a	0	
22	SP			Belsh	25.20	n/a	0	
23	SP			Sot 7	7.20	n/a	0	
24	SP			Alpo TV	26.28	n/a	0	
25	SP			MCN Tv	9.75	1,000	585,000	
26	SP			Bulqiza TV	0.55	n/a	0	
	SubTotal		45,243,686				394,761,900	
1	Pal Shkambi	TV Kopliku	50,000	TV Kopliku			0	
2	Pal Shkambi	TV1 Channel	30,000	TV1 Channel	13.07	n/a	0	
3	Pal Shkambi Pal	Star Plus Radio	20,000	Star Plus	41.30	n/a	0	
4	Shkambi	Jehona	15,000	Radio Jehona			0	
1	SubTotal		115,000	TV/1 Channel	676.70	/-	0	
1	SMI			TV 1 Channel	676.32 24.82	n/a	-	
3	SMI SMI			Report TV News 24	68.33	3,000	4,467,600	
4	SMI			ABC News	10.12	2,400 5,500	9,839,520 3,339,600	
5	SMI			EuroNews	14.90	5,000	4,470,000	
6	SMI			RTV Ora	61.20	2,400	8,812,800	
7	SMI			Syri TV	4.40	n/a	0	
8	SMI			Fax News	40.53	1,600	3,890,880	
9	SMI			TV Best	8.00	n/a	0	
10	SMI			Apollon TV	4.65	n/a	0	
11	SMI			Sot 7	4.42	n/a	0	
	SubTotal		0			.,, =	34,820,400	
1	NTH			Report TV	78.87	3,000	14,196,600	
2	NTH			Top News	11.25	210	141,750	
3	NTH			TV Best	29.33	n/a	0	
	SubTotal		0				14,338,350	
1	PSD			Top Channel	24.37	2,000	2,924,400	
2	PSD			Vizion Plus	0.75	2,000	90,000	
3	PSD			Apollon TV	19.90	n/a	0	
4	PSD SubTotal		0	Antena Nord	33.68	n/a	0 <b>3,014,400</b>	
1	PBK		•	6+1 Vlora	33.37	n/a	0	
'	SubTotal		0	J. I VIOIG	33.37	11/4	0	
1	PLR		•	Apollon TV	8.13	n/a	0	
	SubTotal		0	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	5.15	11/ G	0	
1	PAA		•	Syri TV	4.23	n/a	0	
	SubTotal		0				0	
1	ADK		-	ABC News	0.53	5,500	174,900	
	SubTotal		0				174,900	

SEPTEMBER 2020 - JANUARY 2022

**OBSERVATION** 

REPORT

### Appendix T - Table T-2 - Declared amounts spent on media by candidates

The following table contains a summary of candidate statements for the media. As the candidates are not subject to monitoring by the AMA, a comparison cannot be made as with the electoral subjects. The first column contains the electoral subject under whose logo the candidate has competed, the second column the name of the candidate, the third column the amount paid by him / her and the fourth column the media which is declared to have been paid.

No.	Subject	Candidate	Ammount (ALL)	Media for which payment is declared			
1	SMI	Luljeta Skura	70,000	Mat TV			
2	SMI	Merita Hoxha	35,000	Mat TV			
3	SMI	Kejdi Mehmetaj	123,000	Apollon TV			
4	SMI	Kejdi Mehmetaj	120,000	Star Plus TV			
5	SMI	Floida Kërpaçi	60,000	B.B.F			
6	SMI	Faik Basha	123,120	Syri TV			
7	SMI	Arben Rroko	10,000	Vizion Plus			
8	LRE	Asllan Hoxha	74,200	TV Kukesi			
9	DP	Anduena Qefalia	130,465	Syri TV			
10	SP	Damian Gjiknuri	200,000	Vizion Plus			
11	SP	Bledi Çomo	25,000	Sot 7 TV			
12	SP	Lavdim Krashi	390,000	Top Channel (Emisioni Kandidati)			
13	SP	Vullnet Sinaj	122,920	Scan TV (Emisioni Refim)			
14	SP	Vullnet Sinaj	240,000	Milika Deliaj*			
	To	otal	1,723,705				
* In this case the name of the media is not referred to in the report, but only the invoice data with this name.							

### Appendix T - Table T-3 - Differences of declared payments with those calculated

The following table shows a summary of the data reflected according to the declaration and calculation, and the difference between them is evidenced. The first column contains the subject; the second column presents the declared amount spent by the electoral subject in his self-declaration report; the third column contains the estimated amount spent by multiplying the advertising minutes broadcast according to the AMA and the respective average tariff published by the respective television (as specified in table 1 of this appendix); the fourth column the difference between the declared amount spent and the estimated amount spent according to KRIIK; and the same difference according to the CEC calculations in the fifth column.

No.	Electoral Subject	Amount declared as spent on media (in ALL)	Amount calculated as spent according to advertising minutes by AMA (in ALL)	Difference according to KRIIK (in ALL)	Difference according to the CEC (in ALL)	Statements by candidates (in ALL)
1	DP	20,564,624	292,315,620	271,750,996	224,382,561	130,465
2	RP	2,555,000	0	-2,555,000		
3	FRD	130,507	0	-130,507		
4	LN	515,425	12,396,000	11,880,575	14,145,812	
5	BD	2,007,963	19,522,980	17,515,017	16,161,892	
6	PDIU	3,885,988	57,000	-3,828,988		
7	SP	46,577,686	394,761,900	348,184,214	275,956,867	977,920
8	P. Shkambi	115,000	0	-115,000		
9	SMI	0	34,820,400	34,820,400	19,971,980	541,120
10	NTH	0	14,338,350	14,338,350	13,796,462	
11	PSD	0	3,014,400	3,014,400	4,806,270	
12	PAA	0	0	0		
13	PBK	0	0	0		
14	PLR	0	0	0		
15	ADK	0	174,900	174,900		
	Total	76,352,193	771,401,550	695,049,357	569,221,844	1,649,505



## FINAL OBSERVATION REPORT

SEPTEMBER 2020 - JANUARY 2022

ON THE ELECTION PROCESS FOR THE ASSEMBLY OF ALBANIA OF APRIL 25, 2021

## Pinnon Pi

COALITION FOR REFORMS, INTEGRATION AND CONSOLIDATED INSTITUTIONS (KRIIK ALBANIA)

### CIP Katalogimi në botim BK Tiranë

KRIIK Albania

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