



# FREEDOM OF EXPRESSION: THE CASE FOR MEDIA FREEDOM IN MONTENEGRO

# Table of Contents

# Impresum

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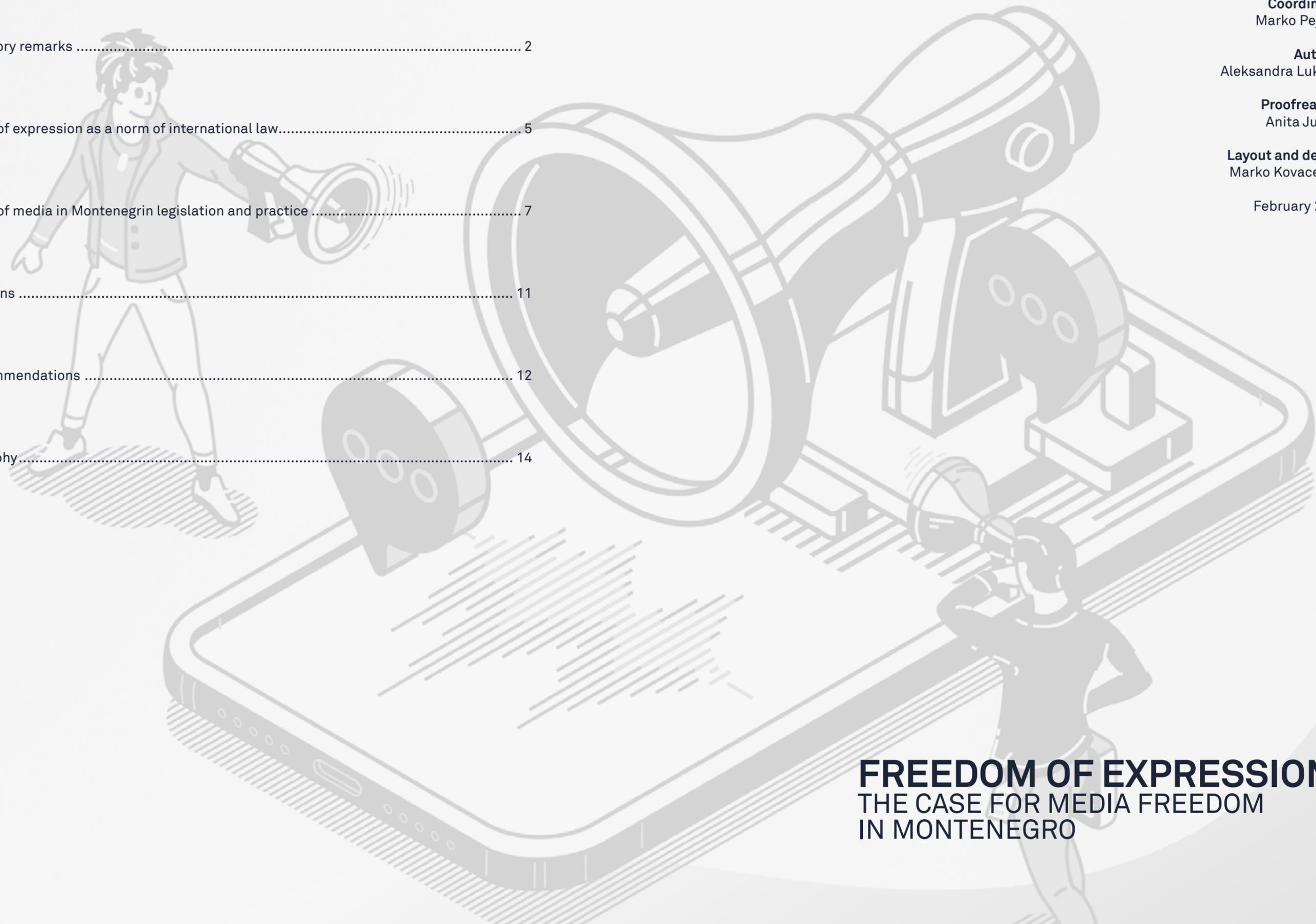
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Introductory remarks .....	2
Freedom of expression as a norm of international law.....	5
Freedom of media in Montenegrin legislation and practice .....	7
Conclusions .....	11
Key recommendations .....	12
Bibliography.....	14

**FREEDOM OF EXPRESSION:  
THE CASE FOR MEDIA FREEDOM  
IN MONTENEGRO**



## Introductory remarks

Freedom of expression is considered to be one of the most important freedoms and every single person should have the right to enjoy it. This freedom is „natural, substantial, public and constitutive”, meaning that it exists regardless of race, gender, or culture. Every member of society is entitled to this right, but it is also a base for many other freedoms like the freedom of the press, freedom of creativity and even freedom of establishing political parties. It is recognized as a modern concept and it was first publicly ratified in the Declaration of the Rights of Man and the Citizen in 1789 during the French Revolution, where it was declared as one of the precious rights of man that must be defined by laws.<sup>1</sup> Since then, many modern international legal documents have referred to the freedom of expression, as indicated in the following chapters.

This paper is mainly focused on the issue of media freedom in Montenegro having in mind that nowadays journalists in Montenegro have been under constant pressures and threatened because of the job that they are doing. In times of a serious pandemic, this problem has been highlighted even more, raising several issues, including the issue of justification of human rights restrictions, the impact of state-imposed restrictive measures on media freedom, the spread of misinformation, etc.

The paper is intended for legal professionals dealing with media freedom, as well as for media outlets and journalists and is aimed at contributing to the promotion and improvement of the freedom of media and freedom of expression in Montenegro.

### Background

Montenegro, an EU accession front-runner is a country of a highly polarised media scene and where better understanding of the role of free media is needed. The best indicator of the state of media freedom in Montenegro is the Reporters Without Borders report, in which Montenegro ranks 105th.<sup>2</sup> Journalists in this country today face a number of challenges, starting with the corona-virus pandemic which has negatively affected the profession. But, at the same time it has shown the importance of the media in society and their function of providing key information to citizens.

Last year, amendments to the Law on Media and the Law on the National Public Broadcaster RTCG were adopted, which brought certain improvements, such as the establishment of a Media Pluralism Fund but also great concern of a part of the media community due to partial restriction of rights.<sup>3</sup>

In Montenegro, January 23<sup>rd</sup> is celebrated as Journalists' Day, so it was an opportunity to launch an appeal for making improvements in the area, as well as to point out the importance of the profession. The challenges media in Montenegro are facing include arrests of editors and journalists, needed legislative amendments that are still pending, unresolved cases of attacks on media and journalists, growing phenomenon of fake news, propaganda and unethical reporting, weak economic position of journalists, and weak self-regulation.<sup>4</sup>

<sup>1</sup> "Position Paper: Freedom of Expression and Security of Society." CEOSS. FID Publications, October 21, 2015. [https://en.ceoss-eg.org/wp-content/uploads/2015/10/Freedom-of-Expression-and-security-o-f-Society\\_Final.pdf](https://en.ceoss-eg.org/wp-content/uploads/2015/10/Freedom-of-Expression-and-security-o-f-Society_Final.pdf), (Accessed on 25.01.2021)

<sup>2</sup> "Montenegro : No Improvement: Reporters without Borders." RSF. (Accessed February 17, 2021.) <https://rsf.org/en/montenegro>.

<sup>3</sup> "Zakon o Medijima: PROPISINET.ME: Svi Propisi Crne Gore Online." PROPISINET.ME | Svi propisi Crne Gore online, August 14, 2020. <https://me.propisi.net/zakon-o-medijima/>, (Accessed 17.02.2021)

<sup>4</sup> "Slobode Ugrožene, Napadi Neriješeni." Dan online, January 23, 2021. <https://www.dan.co.me/?nivo=3&rubrika=Drustvo&datum=2020-01-23&clanak=730346>, (Accessed on 25.01.2021)

Still, journalists reporting on organized crime and corruption are under the greatest threat as they are systematically subjected to physical attacks, death threats, legal harassment, intimidation, or destruction of property. According to the available statistical data from 2014, there have been 48 attack reports of which there were 5 death threats to journalists or related persons and 10 actual attacks on journalists.<sup>5</sup> Journalists in Montenegro are faced with the impunity of perpetrators such as the case of Vladimir Otasevic, who was verbally abused and intimidated by a bodyguard of the Montenegrin businessmen Zoran Becirovic in December 2019, because he had taken photos of Becirovic and the High State Prosecutor Milos Soskic in a cell phone shop. At the time of the attack, Becirovic was under investigation for threatening the Special State Prosecutor. Soskic, who was observing the abuse, remained a silent spectator as the journalist was being threatened.<sup>6</sup>

This is just one example of the problems the media in Montenegro face and how difficult it is to be an investigative journalist because the judicial system simply does not provide sufficient protection of journalists. Another problem is the fact that strong political pressures are exercised on the public broadcaster RTCG is very high, but this is not the case of only just this broadcaster-many of the journalists are being hired based on their political preferences in other media outlets, as well, leaving again the freedom of expression somewhere behind.

In addition, the outbreak of Covid-19 had an impact on every sphere of life including this context, as well. The negative impact of the coronavirus on the work of journalists was confirmed by 86% of employees, who participated in a survey conducted in October of 2020. And the survey mainly referred to financial losses, reduction of salaries, reduced workers, dismissals, difficult working conditions, increased workload, etc.<sup>7</sup>

Media freedom is certainly one of the most important freedoms of truly democratic societies and it is obvious that, as a country pursuing European values, we must ensure the proper implementation of laws on journalism and must take concrete actions. This topic shall be further elaborated in greater detail.

<sup>5</sup> "Izvjestaj o Napadima Na Novinare." Safejournalists. Regionalna platforma za zagovaranje medijskih sloboda i sigurnosti novinara, December 7, 2018. <https://safejournalists.net/me/homepage/>, (Accessed on 25.01.2021)

<sup>6</sup> Kajosevic, Samir. "Montenegro Prosecutor Faces Grilling for Watching Attack on Journalist." Balkan Insight, December 5, 2019. <https://balkaninsight.com/2019/12/05/montenegro-prosecutor-faces-grilling-for-watching-attack-on-journalist/>, (Accessed on 25.01.2021)

<sup>7</sup> "Epidemija i Digitalni Mediji: Povećan Obim Posla, Pad Produktivnosti Zaposlenih i Nedovoljna Pomoć Države." Safejournalists. Regionalna platforma za zagovaranje medijskih sloboda i sigurnosti novinara, December 12, 2020. <https://safejournalists.net/me/epidemija-i-digitalni-mediji-povecan-obim-posla-pad-produktivnosti-zaposlenih-i-nedovoljna-pomoc-drzave/>. (Accessed on 25.01.2021)

## Freedom of expression as a norm of international law

Freedom of expression in international law is considered to be a cornerstone for a stable democracy and a precondition for the enjoyment of many other rights as it includes a set of different guarantees like the freedom of the press, speech, association, assembly, and petition and many more, and is protected by various international conventions. The right to freedom of expression is recognized as a human right under Article 19 of the Universal Declaration of Human Rights, by the multilateral treaty International Covenant on Civil and Political Rights, and most importantly for this work, by the European Convention on Human Rights (Article 10).

Article 10 protects the right to hold our own opinions and to express them freely without government interference, as well as to express our thoughts and views aloud. But, this right is not without limits because it can be restricted in some cases where we have to behave responsibly and respect other people's rights. Public authorities may restrict this right if they can show that their action is lawful, necessary, and proportionate in cases to protect national security, territorial integrity, public safety, prevent disorder or crime, protect health or morals, protect the rights and reputations of other people, prevent the disclosure of information received in confidence, maintain the authority and impartiality of judges.<sup>8</sup>

What does this right mean specifically for media freedom? This right means that the economic survival and independence of the media must not be jeopardized by the state or any other public or private company or organization. The threat of economic sanctions is unacceptable and the state must ensure legal protection of the media in cases of economic pressure or attempts of blackmailing the media through funding from public budgets, marketing activities, or paid public advertising. Secondly, the states must ensure that the media enjoy the full protection of the independent judiciary and government in the performance of their duties. This applies in particular to the defense of physical attacks and harassment.

Judicial authorities must carefully investigate and punish any violation of these rights, as well as threats of denial of these rights. Another point is that censorship must be forbidden. There must be guarantees that independent journalism in all media is free from persecution, pressure, and political or regulatory interference by the authorities. The right to free access to information is considered a key pillar of building a democratic society in which the public's right to information is defined as the supreme principle of government at all levels. It is based on the principle that disclosure of information held by public authorities is the rule, and non-disclosure is the exception. States have also undertaken not to restrict the freedom of access to information for journalists and the media, and to support them in their task of gathering and seeking information, which is important for the journalism as a profession.<sup>9</sup>

<sup>8</sup> "European Convention on Human Rights", European Court of Human Rights, Council of Europe, URL: [https://www.echr.coe.int/Documents/Convention\\_ENG.pdf](https://www.echr.coe.int/Documents/Convention_ENG.pdf), (Accessed on 30.01.2021)

<sup>9</sup> Macovei, Monica. "Freedom of Expression-A Guide to the Implementation of Article 10 of the European Convention on Human Rights." Human Rights and Rule of Law. Council of Europe, 2004. <https://www.coe.int/en/web/human-rights-rule-of-law/human-rights-handbooks>, (Accessed on 30.01.2021)

This right is particularly important for journalists and other people working in the media and here the freedom of expression requires a free, uncensored, and unhindered press in which the media can comment on public issues without censorship or restraint and can inform the public opinion. The media must be free to criticize the government and our public institutions without fear of prosecution – and this is a vital feature of a democratic society. This right is crucial to seeking out and sharing the truth and without it, citizens can not request information and accountability from public officials.

## Freedom of media in Montenegrin legislation and practice

Firstly of all in Montenegro freedom of expression is guaranteed by its Constitution and national legislation but in practice, this right is threatened and the state is failing to provide for the necessary protection. The most important legal acts regulating the field of media in Montenegro are the Law on Media, recently amended, and the Law on Electronic Media. According to the new law, a journalist must provide a source at the request of the prosecution if it is "necessary to protect the interests of national security, territorial integrity and health protection."<sup>10</sup>

Other important regulations that affect the media sector and the rights of citizens with regard to the exercise of freedom of expression and their rights in relation to the media are in particular the Law on Electronic Communications, the Criminal Code and the Copyright Law.

In assessing the state of media freedom, we can refer to the latest report of the European Commission (October 2020), according to which Montenegro made no progress because it was faced with the arrests of the editors of on-line portals and even citizens that posted and shared online content. The Commission also stated that no progress has been made also in the cases of the many attacks on journalists, including the most recent case of the attack on Olivera Lakic, a journalist of Vijesti. Another point was made in the context of tight control of the media which threatens their independence and impartiality and in the context of the growing spread of misinformation that further polarizes society.<sup>11</sup>

Olivera Lakic an investigative journalist who has been working for the Montenegrin daily newspaper Vijesti since 2002, was physically beaten in front of her apartment, and in 2018 again in front of her apartment first in 2012, and in 2018 again in front of her apartment, she was wounded by firearms. There were no concrete arrests made in reference to this case. The focus of Olivera's research was the topics such as crime in Montenegro and smuggling of counterfeit cigarette brands.<sup>12</sup> However, although the court managed to find the perpetrator, the motives and the mastermind behind the

<sup>10</sup> "EK o Zakonu o Medijima Crne Gore: Zaštita Izvora Presudna Za Slobodu Štampe." Radio Slobodna Evropa. EK o Zakonu o medijima Crne Gore: Zaštita izvora presudna za slobodu štampe, July 28, 2020. <https://www.slobodnaevropa.org/a/30753652.html>, (Accessed on 30.01.2021)

<sup>11</sup> See the full report at the: "Montenegro 2020 Report." European Commission. European Commission, October 6, 2020, [https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/montenegro\\_report\\_2020.pdf](https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/montenegro_report_2020.pdf), (Accessed on 30.01.2021)

<sup>12</sup> Jovicevic, Dimitrije. "Napad Na Novinariku 'Vijesti' Prijetnja Slobodi Medija." Radio Slobodna Evropa. March 10, 2012. [https://www.slobodnaevropa.org/a/napad\\_na\\_novinariku\\_vijesti\\_opasan\\_udarac\\_na\\_bezbjednost/24509257.html](https://www.slobodnaevropa.org/a/napad_na_novinariku_vijesti_opasan_udarac_na_bezbjednost/24509257.html), (Accessed on 01.02.2021)

attack remained unknown. These events have been condemned by EU officials who concluded that such cases affect Montenegro's reputation in the international community. In 2020 the Special Prosecutor's Office of Montenegro has arrested two people suspected of planning the murder of journalist Olivera Lakić, and the same group is suspected of the attempted murder of journalist Lakić in 2018 as well.<sup>13</sup>

Another case was an explosion of a bomb in front of the house of Sead Sadiković, also a journalist and editor at Vijesti television, author of the program "Without Borders", on April 1, 2018. Although the motive and the perpetrators were found, they were sentenced to 11 months imprisonment, cumulatively.<sup>14</sup> The attack on the journalist Vladimir Otasević is just another case in which the indictment has been dismissed. And just as Nikola Marković, the President of the Commission for Monitoring Investigations of Attacks on Journalists in Montenegro, said, the cases of attacks on journalists have remained without an epilogue for years. „So far we do not have a single serious case that has been resolved with the exception of the cases referring to verbal attacks, and by this I mean the murder of Đusko Jovanović, the attempted murder of Tufik Softić, the attempted murder of Olivera Lakić, and as well as the bombings of the Vijesti editorial office.”<sup>15</sup>

Indeed, statistical data show that there have been many more such cases, leaving us with the impression that the legislative framework has to be reformed and competent institutions have to be empowered to resolve ongoing cases to make journalists in Montenegro feel safer, but also to guarantee the freedom of expression that is so necessary for the progress of society.

The European Commission has also tackled the issue of growing spread of misinformation in Montenegro as technological advances have changed the way citizens are informed, putting the media at an additional challenge, and as they can often be subjected to media manipulations.

Firstly, the media from the region have a strong presence in Montenegro, such as Kurir.rs, Informer, Espresso.rs, Alo.rs, and these media have been identified in the analysis of fact-finding platforms as sources transmitting misinformation, hate speech, and propaganda. Informer, Kurir, and Alo, along with the Serbian Telegraph, are the most read tabloids in Serbia. In 2019 they have published at least 945 false and unfounded claims on front pages alone.<sup>16</sup> Montenegrin media<sup>17</sup>, have not been perceived as entities spreading misinformation, hate speech, or propaganda.

Crises in Montenegro during 2020, such as reporting on events related to the adoption of the Law on Freedom of Religion, have shown that biased reporting and insufficient respect for ethical standards are more common in the Montenegrin established media. The online space in Montenegro is quite unorganized because online media in Montenegro do not have a clear obligation to register, which

13 Rfe/rf. "Uhapšeni Osumnjičeni Za Planiranje Ubistva Novinarke Olivera Lakić." Radio Slobodna Evropa. Uhapšeni osumnjičeni za planiranje ubistva novinarke Olivera Lakić, December 25, 2020. <https://www.slobodnaevropa.org/a/31019223.html>, (Accessed on 01.02.2021)

14 Tomović, Predrag. "Da li je Novinar Sead Sadiković Bio Meta?" Radio Slobodna Evropa. Da li je novinar Sead Sadiković bio meta?, April 2, 2018. <https://www.slobodnaevropa.org/a/da-li-je-sead-sadikovic-bio-meta/29140280.html>, (Accessed on 01.02.2021)

15 Tomović, Predrag. "Policija Istražuje Napad Na Novinara Dana." Radio Slobodna Evropa. Policija istražuje napad na novinara Dana, December 5, 2019. <https://www.slobodnaevropa.org/a/Jo%C5%A1-jedan-napad-na-novinare-u-crnoj-gori/30307551.html>, (Accessed on 07.02.2021)

16 Marija Vučić, Vesna Radojević. "Najmanje 945 Lažnih Vesti Na Naslovnicama Četiri Tabloida u 2019." Raskrikavanje, January 24, 2020. <https://www.raskrikavanje.rs/page.php?id=557>, (Accessed on 07.02.2021)

17 Most recognizable: RTCG, TV Vijesti, Prva TV and Nova M, daily newspapers Pobjeda, Dan, Vijesti, Dnevne novine, online media Vijesti, portal Analitika, portal AntenaM.

contributes to the spread of misinformation. The Electronic Media Agency maintains a register of electronic publications, but registration is still voluntary. And sites like borba.me and in4s.net were recognized as domestic sources of disinformation and propaganda in Montenegro.<sup>18</sup>

The third point of the progress report referred to the tight control of the media which threatens the independence and impartiality of the media in Montenegro. The problem is that journalists face self-censorship in the sense that they know what topics they can work on, depending on the editorial policy of the media. The main national public broadcaster RTCG was under the influence of the former ruling DPS party. Namely, in 2016 the RTCG Council appointed Andrijana Kadija as Director General, a professional who was not attached to any political structure, and the ruling Democratic Party of Socialists (DPS) lost control over the public broadcaster service RTCG.<sup>19</sup>

According to the research of the Center for Civic Education, certain program improvements were soon visible, especially in the area of providing more the space for pluralism of opinion, but also in reporting on various topics that are unpleasant for the authorities, which are actually the primary tasks of a true public media.<sup>20</sup> But, soon after Andrijana Kadija was removed and this move was interpreted as returning RTCG to the political control of the ruling Democratic Party of Socialists (DPS). Today, RTCG is closed to reasoned, different, and critical opinions. This becomes a bad example for other media because it puts journalists in a situation where they have to choose topics within the media in which they work and do not have enough freedom to express their real views without prior editorial control.<sup>21</sup>

In the view of EU, neither the Covid-19 pandemic nor other above-mentioned problems can be used as an excuse to impose unjustified restrictions on media freedom and freedom of expression and great efforts must be made to enable the realization of this right also in Montenegro.<sup>22</sup>

18 Bogdanović, Milica, and Milica Lipovac. "RESEARCH: Political and Economic Foundations of Hate and Disinformation in Montenegro." SEENPM. SEENPM, Peace Institute, October 24, 2020. <https://seenpm.org/research-political-and-economic-foundations-of-hate-and-disinformation-in-montenegro/>, (Accessed on 09.02.2021), pp. 8-10

19 Janković, Srđan. "Smijenjena Direktorica RTCG: 'Nisam Dozvolila Partijski Servis'." Radio Slobodna Evropa., June 8, 2018. <https://www.slobodnaevropa.org/a/smjena-kadija-rtcg/29278641.html>, (Accessed on 10.02.2021)

20 See more: "Mediji u Crnoj Gori - Između Zagrljaja Vlasti i Borbe Za Profesiju." Centar za građansko obrazovanje (CGO), Podgorica, 2020. <http://media.cgo-cce.org/2020/04/Mediji-u-CG-izmedju-zagrljaja-vlasti-i-borbe-za-slobodu-web.pdf>, (Accessed on 10.02.2021)

21 Ibid.

22 "Declaration by the High Representative Josep Borrell, on Behalf of the European Union, on the Occasion of the World Press Freedom Day, 3 May 2020." Consilium. Council of the European Union, May 2, 2020. <https://www.consilium.europa.eu/en/press/press-releases/2020/05/02/declaration-by-the-high-representative-josep-borrell-on-behalf-of-the-european-union-on-the-occasion-of-the-world-press-freedom-day-3-may-2020/>, (Accessed on 16.02.2021)

## Conclusions

We can conclude that in Montenegro ensuring full enjoyment of human rights for all citizens is still a challenge. Even though the country has a legal framework which envisages the protection of human rights, in practise human rights are not protected at an adequate level and great efforts have to be made in this area so that Montenegrin citizens could enjoy these rights freely. In this context, one has to ask why is it so important to achieve a satisfactory level of media freedom? Because the existence of free, independent and diverse media is not only a feature of a healthy democracy but also a necessary basis for achieving democracy. It is necessary to achieve accountability in public life and gain public trust in the government and the rule of law. In order to make real progress and address serious shortcomings, the authorities should acknowledge the dangers that journalists face because of their work and resolutely address them.

Let us not forget that also journalists have a great role in this endeavour. In doing their work, they should act in line with the principle of professionalism. They are also responsible for knowing their own rights because it is a basic condition for their protection and the creation of a culture of respect for media freedom.

Therefore, having this in mind, it is essential that the judicial system be independent of political and other pressures. Conducting criminal investigations into cases of violence against journalists, as well as other cases involving crimes and oppression of the media, must be timely, impartial, effective and professional. We just have to keep in mind that all the necessary reforms are put in place for the sake of a better society and democracy in Montenegro, and not just for the sake of simply meeting the EU membership criteria or the requirements of other international organizations. All relevant actors should be fully aware that the enjoyment of human freedoms is a prerequisite for the overall development of society.

## Key recommendations

### To the government of Montenegro

The government of Montenegro should:

- ensure that all attacks on journalists and media outlets are unequivocally condemned and it should provide a prompt and thorough investigation into all such incidents;
- conduct prompt, effective, impartial, and thorough investigations on all attacks and threats against journalists and media outlets, including cybercrime, and where appropriate, to ensure prosecution of such offenders;
- ensure the existence of an effective and independent judiciary and adopt the necessary laws to protect journalists;
- employ efforts to provide better protection against the spread of misinformation on online platforms throughout adequate fact-checking platforms;
- make all necessary efforts to ensure transparency of the national public broadcaster RTCG and to prevent the risk of undue pressure on editors and journalists.

### To the European Union

- In its reports, EU should, in dialogue with Montenegro, emphasize the importance of improving the situation for journalists and the climate for media freedom and further emphasize the importance of conducting reforms and implementing the recommendations contained in Chapter 23, which is also very important for media freedom;
- The European Union should use every opportunity to call upon Montenegrin authorities to put their efforts in ending the intimidation of journalists and media outlet, to take necessary steps to advance investigations into attacks and threats against journalists and to bring perpetrators to justice. It would also be useful to send an expert mission to deal with the above-mentioned cases in detail;
- It should use the mechanisms available within the accession process to ensure that Montenegrin authorities are dedicated to the recommendations given in the report and ensure that the system is based on the principle of the rule of law, thus providing a better environment for the work of journalists and media freedom

## Bibliography

"Position Paper: Freedom of Expression and Security of Society." CEOSS. FID Publications, October 21, 2015. [https://en.ceoss-eg.org/wp-content/uploads/2015/10/Freedom-of-Expression-and-security-o-f-Society\\_Final.pdf](https://en.ceoss-eg.org/wp-content/uploads/2015/10/Freedom-of-Expression-and-security-o-f-Society_Final.pdf), (Accessed on 25.01.2021)

Montenegro : No Improvement: Reporters without Borders." RSF. <https://rsf.org/en/montenegro>, (Accessed 17.02.2021)

"Zakon o Medijima: PROPISINET.ME: Svi Propisi Crne Gore Online." PROPISINET.ME | Svi propisi Crne Gore online, August 14, 2020. <https://me.propisi.net/zakon-o-medijima/>, (Accessed 17.02.2021)

"Slobode Ugrožene, Napadi Neriješeni." Dan online, January 23, 2021. <https://www.dan.co.me/?nivo=3&rubrika=Drustvo&datum=2020-01-23&clanak=730346>, (Accessed on 25.01.2021)

"Izvjestaj o Napadima Na Novinare." Safejournalists. Regionalna platforma za zagovaranje medijskih sloboda i sigurnosti novinara, December 7, 2018. <https://safejournalists.net/me/homepage/>, (Accessed on 25.01.2021)

Kajosevic, Samir. "Montenegro Prosecutor Faces Grilling for Watching Attack on Journalist." Balkan Insight, December 5, 2019. <https://balkaninsight.com/2019/12/05/montenegro-prosecutor-faces-grilling-for-watching-attack-on-journalist/>, (Accessed on 25.01.2021)

"Epidemija i Digitalni Mediji: Povećan Obim Posla, Pad Produktivnosti Zaposlenih i Nedovoljna Pomoć Države." Safejournalists. Regionalna platforma za zagovaranje medijskih sloboda i sigurnosti novinara, December 12, 2020. <https://safejournalists.net/me/epidemija-i-digitalni-mediji-povecan-obim-posla-pad-produktivnosti-zaposlenih-i-nedovoljna-pomoc-drzave/>. (Accessed on 25.01.2021)

"European Convention on Human Rights", European Court of Human Rights, Council of Europe, URL: [https://www.echr.coe.int/Documents/Convention\\_ENG.pdf](https://www.echr.coe.int/Documents/Convention_ENG.pdf), (Accessed on 30.01.2021)

Macovei, Monica. "Freedom of Expression-A Guide to the Implementation of Article 10 of the European Convention on Human Rights." Human Rights and Rule of Law. Council of Europe, 2004. <https://www.coe.int/en/web/human-rights-rule-of-law/human-rights-handbooks>, (Accessed on 30.01.2021)

EK o Zakonu o Medijima Crne Gore: Zaštita Izvora Presudna Za Slobodu Štampe." Radio Slobodna Evropa. EK o Zakonu o medijima Crne Gore: Zaštita izvora presudna za slobodu štampe, July 28, 2020. <https://www.slobodnaevropa.org/a/30753652.html>, (Accessed on 30.01.2021)

"Montenegro 2020 Report." European Commission. European Commission, October 6, 2020, <https://ec.europa.eu/neighbourhood-enlargement/>, (Accessed on 30.01.2021)

Jovicevic, Dimitrije. "Napad Na Novinarku 'Vijesti' Prijetnja Slobodi Medija." Radio Slobodna Evropa. March 10, 2012. [https://www.slobodnaevropa.org/a/napad\\_na\\_novinarku\\_vijesti\\_opasan\\_udarac\\_na\\_bezbjednost/24509257.html](https://www.slobodnaevropa.org/a/napad_na_novinarku_vijesti_opasan_udarac_na_bezbjednost/24509257.html), (Accessed on 01.02.2021)

Rfe/rl. "Uhapšeni Osumnjičeni Za Planiranje Ubistva Novinarke Olivera Lakić." Radio Slobodna Evropa. Uhapšeni osumnjičeni za planiranje ubistva novinarke Olivera Lakić, December 25, 2020. <https://www.slobodnaevropa.org/a/31019223.html>, (Accessed on 01.02.2021)

Tomovic, Predrag. "Da Li Je Novinar Sead Sadiković Bio Meta?" Radio Slobodna Evropa. Da li je novinar Sead Sadiković bio meta?, April 2, 2018. <https://www.slobodnaevropa.org/a/da-li-je-sead-sadikovic-bio-meta/29140280.html>, (Accessed on 01.02.2021)

Tomovic, Predrag. "Policija Istražuje Napad Na Novinara Dana." Radio Slobodna Evropa. Policija istražuje napad na novinara Dana, December 5, 2019. <https://www.slobodnaevropa.org/a/jo%C5%A1-jedan-napad-na-novinara-u-crnoj-gori/30307551.html>, (Accessed on 07.02.2021)

Marija Vučić, Vesna Radojević, "Najmanje 945 Lažnih Vesti Na Naslovnica Četiri Tabloida u 2019." Raskrikavanje, January 24, 2020. <https://www.raskrikavanje.rs/page.php?id=557>, (Accessed on 07.02.2021)

Bogdanovic, Milica, and Milica Lipovac. "RESEARCH: Political and Economic Foundations of Hate and Disinformation in Montenegro." SEENPM. SEENPM, Peace Institute, October 24, 2020. <https://seenpm.org/research-political-and-economic-foundations-of-hate-and-disinformation-in-montenegro/>, (Accessed on 09.02.2021), pp. 8-10

Janković, Srđan. "Smijenjena Direktorica RTCG: 'Nisam Dozvolila Partijski Servis'." Radio Slobodna Evropa. Smijenjena direktorica RTCG: 'Nisam dozvolila partijski servis', June 8, 2018. <https://www.slobodnaevropa.org/a/smijena-kadija-rtcg/29278641.html>, (Accessed on 10.02.2021)

"Declaration by the High Representative Josep Borrell, on Behalf of the European Union, on the Occasion of the World Press Freedom Day, 3 May 2020." Consilium. Council of the European Union, May 2, 2020. <https://www.consilium.europa.eu/en/press/press-releases/2020/05/02/declaration-by-the-high-representative-josep-borrell-on-behalf-of-the-european-union-on-the-occasion-of-the-world-press-freedom-day-3-may-2020/>, (Accessed on 16.02.2021)

"Mediji u Crnoj Gori - Između Zagrljaja Vlasti i Borbe Za Profesiju." Centar za građansko obrazovanje (CGO), Podgorica, 2020, <http://media.cgo-cce.org/2020/04/Mediji-u-CG-izmedju-zagrljaja-vlasti-i-borbe-za-slobodu-web.pdf>, (Accessed on 10.02.2021)

