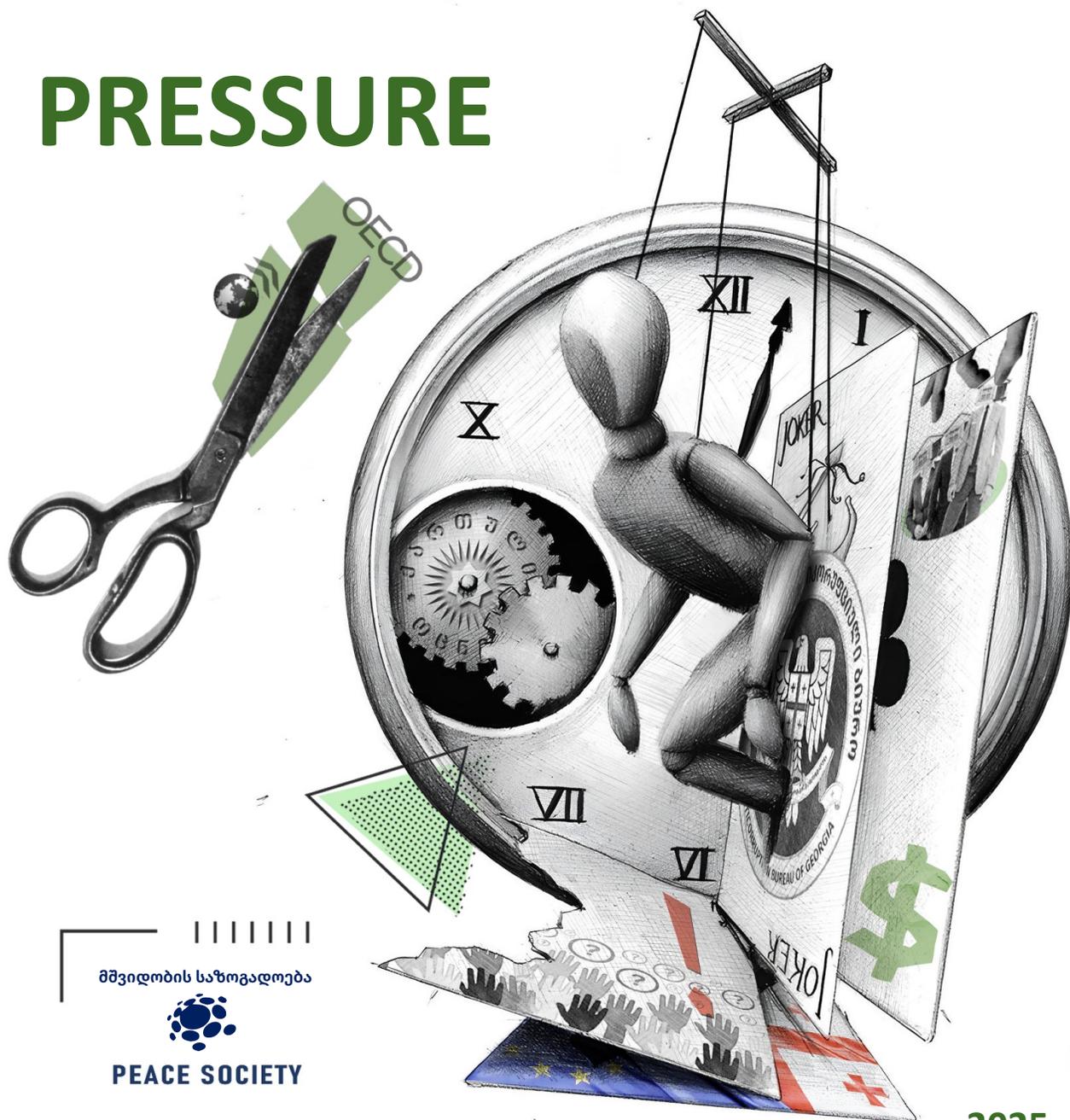


ANTI-CORRUPTION BUREAU AS A MECHANISM OF POLITICAL PRESSURE



მშვიდობის საზოგადოება



PEACE SOCIETY

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INTRODUCTION

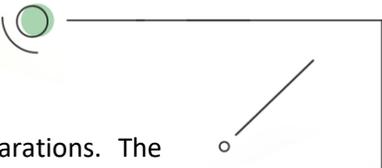
The strengthening of anti-corruption policy has become one of Georgia's most significant state priorities since the country undertook the obligation to implement the twelve priorities determined by the European Commission for obtaining EU candidate status. Among these priorities, a central place was given to the creation of effective mechanisms against corruption, particularly high-level corruption. It was in this context that the process of establishing the Anti-Corruption Bureau (hereinafter the "Bureau") began, with the aim of reinforcing the institutional framework for combating corruption, monitoring public officials' asset declarations, ensuring transparency in the financial activities of political parties, and providing mechanisms for the protection of whistle-blowers.

From the very outset of the Bureau's establishment, numerous questions arose concerning its independence, accountability, and actual effectiveness. Later, during its operational phase, the Bureau's bias and pursuit of partisan interests became even more apparent. Instead of identifying corruption risks in the country and effectively examining and monitoring asset declarations, overseeing the financial activities of political parties, strengthening whistleblower protection mechanisms, and responding to identified problems, the Bureau's primary mission and function were determined as the suppression of civil society.

The expansion of the Bureau's functions – including the transfer of enforcement mechanisms under the so-called FARA and Law on Grants – has assigned the institution a new role, whose only real objective is to act against civil society and critical media. As a result, the agency established to fight corruption is increasingly perceived as an instrument of political control, contradicting both the standards set by EU recommendations and the principles of democratic governance. Under the rule of the Georgian Dream party, the institution today serves as one of the key components for advancing partisan interests.

KEY FINDINGS

- The establishment of the Anti-Corruption Bureau was an important step towards the prevention of corruption; however, its institutional model fails to ensure political neutrality and independence from the influence of the executive branch;
- The Bureau's functions are extensive. The institution performs analytical and preventive, as well as supervisory and sanctioning activities, yet it does not effectively fulfil its formally granted mandate in practice;

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- The Bureau does not conduct effective monitoring of asset declarations. The supervision of such declarations is superficial, with no substantive analysis of their content, no identification of potential corruption-related issues, and no subsequent response. Moreover, certain individuals' asset declarations are still not publicly available;
 - The existing legal framework does not guarantee that whistleblowers operate within an independent, protected, and effective system. Furthermore, based on information requested from the Bureau and published on its website, it remains unclear what measures the institution has undertaken in this regard;
 - The assignment of additional functions to the Anti-Corruption Bureau (the so-called FARA and the Law on Grants) exceeds the original purpose of its establishment and turns the institution into a key instrument serving the interests of the Georgian Dream party;
 - The Bureau misuses the mandate granted under repressive legislation, demanding from organisations, without justification, types of information that fall outside its scope of authority;
 - The Anti-Corruption Bureau, like other state agencies, has evolved into one of the Georgian Dream party's political tools, used not for the prevention or elimination of corruption risks, but against civil society, the media, and citizens;
 - The Bureau's budget increases annually; however, transparency in this regard is not ensured;
 - While the Bureau focuses on the transparency of other organisations, it fails to disclose information related to its own operations. Despite requests for information made by the organisation Peace Society, the Bureau merely provided a link to its website;
 - Despite having a seemingly informative website, it is impossible to obtain complete and substantive information about the Bureau's activities;
 - The Anti-Corruption Bureau monitors the media and civil society organisations in gross violation of repressive legislation. It demands information from organisations that falls beyond its legal mandate. Furthermore, such demands are entirely unsubstantiated and legally absurd;
 - Instead of providing legal reasoning and adopting objective decisions, the courts automatically uphold the Bureau's requests and, without proper legal justification, compel organisations to disclose even special categories of personal data, referring to unreasonable circumstances; and
 - The Anti-Corruption Bureau has initiated the monitoring of numerous organisations; however, the criteria by which it determines from which organisations to request information remain unclear.

1. CONTEXT AND PURPOSE OF THE ESTABLISHMENT OF THE ANTI-CORRUPTION BUREAU

On 23 June 2022, the European Council endorsed the European Commission's decision of 17 June 2022, under which Georgia was tasked with fulfilling twelve priorities to obtain EU candidate status. The fourth priority set by the European Commission concerned the strengthening of the fight against corruption, particularly high-level corruption. Specifically, it required *enhancing the independence of the anti-corruption agency, especially for the purpose of uncovering high-level corruption cases*.¹ In July of the same year, the Georgian Dream party presented a plan for implementing the twelve priorities outlined as conditions for obtaining candidate status. The opposition was not involved in the development of this plan. Furthermore, Georgian Dream did not take into account the recommendations of civil society organisations in this regard.

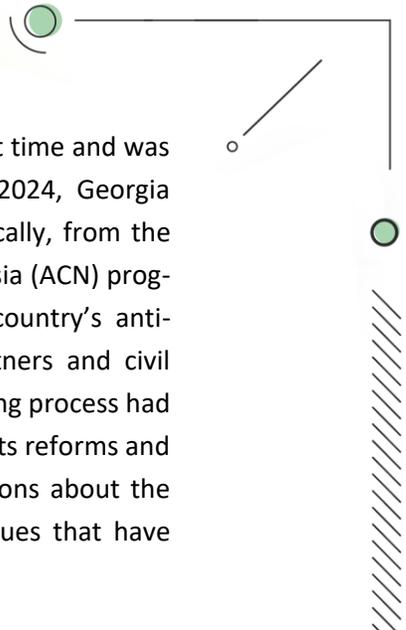
According to Georgian Dream's plan, the draft law initially proposed by the working group established under the Parliamentary Committee on Legal Issues **did not even formally address the monitoring of public officials' asset declarations, the protection of whistleblowers, or the strengthening of administrative capacities for monitoring party and campaign financing**. The initiative also did not envisage granting the Anti-Corruption Bureau investigative powers, which had been the main objective of the European Commission's recommendation. However, the Bureau was later equipped with all the aforementioned functions, except for investigative authority. Accordingly, the amendments introduced by Parliament to the law, beyond determining the general policy for combating corruption, provided the Bureau with the following functions: ***monitoring the asset declarations of public officials, implementing whistleblower protection measures, and overseeing, in accordance with the law, the financial activities of citizens' political associations (political parties), electoral subjects, and persons pursuing electoral objectives***.

Despite these amendments, in its opinion published on 15–16 December 2023, the Venice Commission noted that, since the authority to appoint and dismiss the head of the Bureau lies primarily in the hands of the Prime Minister,² the amended legislation does not ensure the institution's independence. Since 10 February 2023, the Anti-Corruption Bureau has been headed by Mr Razhden Kuprashvili, appointed by the then Prime Minister, Mr Irakli Gharibashvili.³ The selection commission consisted of seven members, all representing state institutions except for the acting Public Defender and a representative of a civil society organisation.

¹ [eeas.europa.eu](https://www.eeas.europa.eu/sites/default/files/documents/12%20Priorities.pdf), see <https://www.eeas.europa.eu/sites/default/files/documents/12%20Priorities.pdf>.

² [venice.coe.int](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2023)046-e), see [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2023\)046-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2023)046-e).

³ [factcheck.ge](https://shorturl.at/7Ql8m), see <https://shorturl.at/7Ql8m>.



Although the Anti-Corruption Bureau had already been established at that time and was expected to take significant steps in the fight against corruption, in 2024, Georgia withdrew from the OECD's anti-corruption monitoring process – specifically, from the organisation's Anti-Corruption Network for Eastern Europe and Central Asia (ACN) programme. This development was assessed as a serious setback in the country's anti-corruption agenda and caused concern among both international partners and civil society. Close cooperation with the OECD and participation in its monitoring process had provided Georgia with an opportunity to demonstrate the seriousness of its reforms and to strengthen international trust. Its withdrawal, however, raises questions about the sustainability of these reforms and the political will behind them – issues that have become particularly evident in light of recent developments.

2. FUNCTIONS AND RESPONSIBILITIES OF THE ANTI-CORRUPTION BUREAU AND THEIR IMPORTANCE

The Anti-Corruption Bureau is entrusted with several functions:

1. Monitoring of public officials' asset declarations

- The Bureau verifies the asset and financial declarations of public officials, ensuring their accuracy and timely submission; and
- In the event of violations, it has the authority to initiate appropriate responses and transfer information to investigative bodies.

2. Supervision of political party finances

- The Bureau monitors the financing of political parties and election campaigns; and
- The purpose of this supervision is to ensure the transparency of party financing and to prevent illegal or impermissible donations.

3. Development and monitoring of the national anti-corruption strategy

- The Bureau acts as the main coordinating body responsible for preparing state policy documents in the field of combating corruption; and
- It manages the implementation plan, oversees progress, and disseminates reports.

4. Monitoring of ethics and conflict of interest

- The Bureau ensures that public officials do not engage in conflicts of interest, comply with ethical standards, and refrain from using their position for personal gain.

5. Cooperation with the public and international organisations

- The Bureau conducts awareness-raising campaigns and cooperates with civil society; and
- It also coordinates with international structures to ensure the implementation of relevant recommendations.

6. Control and monitoring of civil society organisations' funding under the so-called FARA and the Law of Georgia on Grants

- The Bureau monitors the funding of civil society organisations by requesting information both from various state or private institutions and directly from the organisations themselves; and
- It supervises the use of foreign grant funding issued with government authorisation to ensure it is used for its intended purposes.

Formally, the Bureau's duties are directed towards **prevention, monitoring, and coordination**. Under the legislation, it establishes a systemic framework – supervision, accountability, and policy planning – that is essential for ensuring that the fight against corruption is genuine, multi-faceted, and effective. During the drafting of the law establishing the Bureau, civil society organisations noted that, had the Bureau been granted investigative powers and had its head been elected by Parliament through a qualified majority and cross-party consensus, it would have possessed strong mechanisms to investigate corruption at all levels, including cases involving high-ranking officials.

For the monitoring of declarations and political party finances, as well as for maintaining the register of so-called “foreign agents” and the register of foreign grants, the Bureau has created online platforms⁴ that, at first glance, appear to allow public access to information about its individual activities. However, monitoring conducted by the organisation has revealed that a significant amount of information is not available on the Bureau's website. This includes details such as what specific steps the Anti-Corruption Bureau has taken in the fight against corruption, what potential corruption-related issues have been identified during the monitoring of declarations, how the institution has responded to them, and what measures have been implemented to strengthen the whistleblower protection mechanism, among others.

⁴ portal.acb.gov.ge, Electronic portal on the Anti-Corruption Bureau website.

2.1 REVIEW OF THE ACTIVITIES OF THE ANTI-CORRUPTION BUREAU

As already noted, the Anti-Corruption Bureau – established within the framework of implementing the European Commission’s recommendations – is responsible for monitoring the asset declarations of public officials, implementing whistleblower protection measures, and overseeing, in accordance with the law, the financial activities of citizens’ political associations (political parties), electoral subjects, and persons pursuing electoral objectives. According to the European Commission’s opinion, in order to combat corruption effectively, it was necessary to:

- Expand the scope of the law concerning the submission of asset declarations by public officials;
- Improve the monitoring process for ensuring compliance with the obligation to submit asset declarations;
- Strengthen the mechanism for the protection of whistleblowers; and
- Enhance the monitoring of party financing and financial activities related to electoral campaigns.

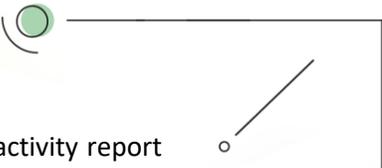
Although the Bureau has been formally equipped with the necessary mandate, in practice it has not fulfilled its designated functions. Like other state institutions, the **Anti-Corruption Bureau has evolved into one of the Georgian Dream party’s political instruments, used not for the prevention or elimination of corruption risks, but against civil society, the media, and citizens.**

MONITORING OF DECLARATIONS

Monitoring the asset declarations of individuals employed in the public service is one of the key mechanisms for preventing corruption and ensuring transparency in public administration. Such monitoring increases public officials’ accountability and, in cases of false reporting, creates serious legal and reputational risks for them. The human and material resources allocated to the Anti-Corruption Bureau were intended precisely for this purpose.

Instead of intensifying the monitoring of declarations and taking specific measures accordingly, the process in this area has become even more complicated. Since December 2024, the asset declarations of public officials have no longer been publicly available, making external oversight impossible.⁵ Moreover, although the law stipulates that the results of declaration monitoring must be published proactively at the end of each

⁵ [tvpirveli.ge](https://tvpirveli.ge/ka/siaxleebi/politika/103858-ratom-ar-idzebneba-ivanishvilis-qonebrivi-deklaratsia-ras-amboben-otsnebash), Why Ivanishvili’s Asset Declaration Can’t Be Found – What “Dreamers” Are Saying, 20.06.25, see <https://tvpirveli.ge/ka/siaxleebi/politika/103858-ratom-ar-idzebneba-ivanishvilis-qonebrivi-deklaratsia-ras-amboben-otsnebash>.



calendar year,⁶ the report for 2024 was not released. The Bureau's 2024 activity report was submitted to Parliament only in June 2025. The declarations became public again only after Mr Irakli Kobakhidze announced that they should soon be disclosed.⁷ This once again demonstrated the Bureau's lack of independence.

Prior to the publication of the declarations, the organisation sought to determine why and for what reasons the declarations had ceased to be publicly accessible. Accordingly, it addressed the Anti-Corruption Bureau with a request for public information,⁸ asking the following questions:

When will the malfunction of the electronic system for public declarations be rectified, and when will the electronic publication of declarations resume? What caused the malfunction of the electronic databases? During the monitoring process, how many violations did the Bureau identify between December 2022 and 1 May 2025, and how many of them have been remedied? In cases where violations have not been remedied, what stage has the response process reached? Has the Bureau referred any potential offences to investigative bodies, and, if so, what is the status of those investigations?

In response, on 28 May 2025, the Anti-Corruption Bureau sent an email to the organisation containing only a link to its website, without providing any specific answers.

In 2024, the Anti-Corruption Bureau announced that it would examine the asset declarations of public officials belonging to groups characterised by high public interest and elevated corruption risks. Among those selected for review were four judges. However, in April 2024, these judges appealed to the Tbilisi City Court, requesting the suspension of the Bureau's monitoring of their asset declarations. The court granted their request. Such cases – especially within the judiciary – raise well-founded suspicions of potential corruption risks and further undermine public trust in the judicial system as a whole. Following the monitoring process, the Bureau did not publish the full results of its review.

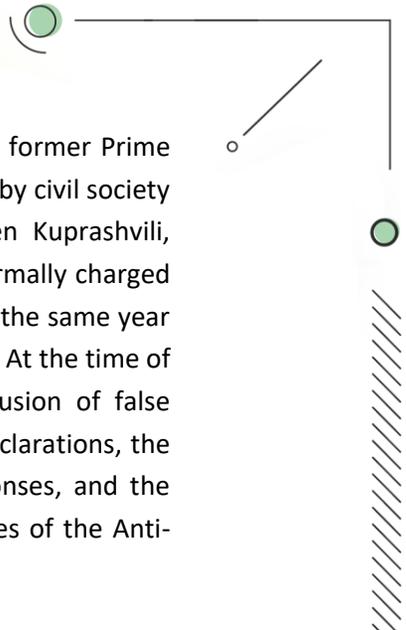
After the asset declarations were made public, external monitoring by independent actors revealed several suspicious corruption-related issues. Of particular concern were the financial circumstances of incumbent public officials and the acquisition of expensive property, yet Mr Razhden Kuprashvili's Bureau raised no questions in this regard.⁹

⁶ Law of Georgia on Combating Corruption, Article 18¹.7, see <https://matsne.gov.ge/document/view/33550?publication=95>.

⁷ [interpressnews.ge](https://www.interpressnews.ge), Irakli Kobakhidze on Asset Declarations – I Think They Should Be Published Immediately, I Could Also Get Involved, see <https://www.interpressnews.ge/ka/article/840199-irakli-kobaxize-konebriv-deklaraciebze-me-mgonia-rom-sasrapod-unda-gamokveqndes-mec-shemizlia-davinteresde/>.

⁸ Letter of Peace Society no. PS/2025/8.

⁹ For example, see <https://bm.ge/news/ra-gonebas-floben-levan-davitashvili-da-mariam-qvrivishvili>; <https://www.radiotavisupleba.ge/a/33183524.html>.



A particularly notable example in this context is the asset declaration of former Prime Minister Mr Irakli Gharibashvili. Despite longstanding concerns expressed by civil society about possible corrupt dealings, the head of the Bureau, Mr Razhden Kuprashvili, remained silent. Although in October 2025 Mr Irakli Gharibashvili was formally charged with large-scale money laundering, Mr Kuprashvili had declared in July of the same year that there were no violations in the former Prime Minister's declaration.¹⁰ At the time of the indictment, however, the Prosecutor General highlighted the inclusion of false information in Mr Gharibashvili's declaration. The monitoring of asset declarations, the identification of potential violations, the initiation of appropriate responses, and the referral of cases to competent authorities are among the statutory duties of the Anti-Corruption Bureau.

PROTECTION OF WHISTLEBLOWERS

A strong whistleblower protection system is an important instrument for combating corruption and ensuring transparency in the public sector. When the state establishes safe, independent, and effective mechanisms for the protection of whistleblowers, it reduces the risk of systemic violations being concealed and facilitates the early detection of problems. Such a system strengthens citizens' trust in state institutions. International practice clearly demonstrates that a robust whistleblower protection framework often becomes a decisive factor in transforming corrupt systems and reinforcing the rule of law.¹¹

Alongside its other functions, the issue of whistleblowers has been included within the mandate of the Anti-Corruption Bureau. Previously, this function was under the authority of the Civil Service Bureau. Since 2015, an electronic platform has existed through which whistleblowing could be carried out anonymously. This function was transferred to the Anti-Corruption Bureau with virtually no changes, and the electronic platform was subsequently integrated into the Bureau's website.¹²

Accordingly, although this function has been transferred to the mandate of the Anti-Corruption Bureau and, at first glance, progressive steps might have been expected, challenges remain both in terms of legislative regulation and implementation.¹³

¹⁰ [bm.ge](https://shorturl.at/ef2vj), There Are No Violations in the Declarations of Liluashvili, Gharibashvili, Gomelauri – Razhden Kuprashvili, see <https://shorturl.at/ef2vj>.

¹¹ ICC 2022 Guidelines on Whistleblowing, see <https://iccwbo.org/news-publications/policies-reports/icc-2022-guidelines-on-whistleblowing/>.

¹² See <https://mkhileba.acb.gov.ge/>.

¹³ [idfi.ge](https://idfi.ge/public/upload/Analysis/sruli%20statia%20203.pdf), Challenges Related to the Effective Implementation of the Whistleblower Institution in Georgia, 2022, see <https://idfi.ge/public/upload/Analysis/sruli%20statia%20203.pdf>.

3. ANTI-CORRUPTION BUREAU – A TOOL USED AGAINST CIVIL SOCIETY

The use of the Anti-Corruption Bureau against civil society became evident after the enactment of the so-called Georgian version of FARA. Furthermore, under the Law of Georgia on Grants, prior authorisation from the Government of Georgia became a prerequisite for issuing a foreign grant. The Anti-Corruption Bureau was thus assigned the responsibility of maintaining the so-called FARA register, overseeing the activities of registered organisations (“agents”), identifying unregistered violators, and, when necessary, referring their cases to the Prosecutor’s Office. The Bureau also monitors the implementation of foreign grants issued in compliance with the requirements of the Law of Georgia on Grants.

3.1 REVIEW OF FARA

In 2025, the Parliament dominated by the Georgian Dream party adopted a new law titled the Foreign Agents Registration Act. This law replicates the undemocratic objectives of the 2024 Law on Transparency of Foreign Influence and further expands the scope of state repression.

Under the so-called FARA,¹⁴ both legal and natural persons who receive financial or other types of support from abroad and carry out activities “in the interests of a foreign principal” while simultaneously engaging in “political activity” are required to register in the register of foreign agents. In addition to registration, the law mandates the submission to the Anti-Corruption Bureau of information regarding communications with the foreign principal, annual financial declarations, public statements, and copies of written correspondence. Violations of the law’s key provisions are subject to criminal penalties, including fines and imprisonment.

The existence of a free press and a strong civil society is critically important in a democratic society. They foster pluralistic debate, assess government policy, and ensure checks and balances on power. Owing to the repressive nature of this law, the space for critical thought in the country is effectively being curtailed.

When introducing the initiative, representatives of the Georgian Dream party claimed that it was modelled on the American FARA; however, the key difference lies in the historical and political context. In the United States, the law was enacted in 1938 to counter Nazi Germany.¹⁵ By contrast, Georgian Dream designates domestic civil society organisations – those that operate under their own agendas and have long served the

¹⁴ matsne.gov.ge, Law of Georgia on Foreign Agents Registration Act, available at: <https://matsne.gov.ge/document/view/6461578?publication=0>.

¹⁵ justice.gov, see <https://www.justice.gov/nsd-fara>

interests of the country – as “agents.” The U.S. Department of Justice has applied FARA-related criminal prosecution only in cases involving serious offences such as money laundering, fraud, violations or evasion of international sanctions, and links to terrorism. In the United States, FARA has never been used against domestic organisations or the media. Consequently, under the strict rules defined by the U.S. Department of Justice, the FARA register includes outlets such as *Sputnik* and *Russia Today*, but not, for instance, the BBC or *Deutsche Welle*.¹⁶

Accordingly, civil society organisations and independent media outlets have strongly criticised the law, arguing that it gives the government a convenient tool to suppress critical voices by turning the new regulations into an instrument of repression.¹⁷ It is worth noting that the terms “foreign principal,” “foreign influence agent,” and “political activity” are defined in vague terms, allowing for opaque or bad-faith interpretations.¹⁸

International human rights organisations have also expressed concern that the adoption of such a repressive law distances Georgia from the standards established by European human rights legislation.¹⁹ Furthermore, in its opinion of 15 October 2025, the Venice Commission explicitly stated that repressive laws, including the Foreign Agents Registration Act, should be repealed.²⁰

3.1.1 ENFORCEMENT OF FARA

The Anti-Corruption Bureau began fulfilling its obligations under the new law and initiated monitoring procedures against several civil society and media organisations. On 11 August 2025, six non-governmental organisations received letters from the Bureau accusing them of violating the Foreign Agents Registration Act (FARA).²¹ These organisations were: the Civil Society Foundation (formerly Open Society – Georgia Foundation), Sapari, Transparency International Georgia, the Media Development Foundation, the International Society for Fair Elections and Democracy (ISFED), and the Social Justice Centre.²²

¹⁶ dev.forbes.ge, see <https://dev.forbes.ge/fara-thu-pharsi-rusuli-kanoni-amerikuli-shephuthvith/>.

¹⁷ hrw.org Georgia: Drop Repressive ‘Foreign Agents’ Bill, available at: <https://www.hrw.org/news/2025/03/26/georgia-drop-repressive-foreign-agents-bill>.

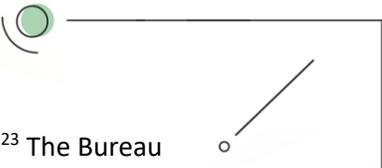
¹⁸ civil.ge, Foreign Agents Registration Act, available at: <https://civil.ge/ka/archives/667170>.

¹⁹ fidh.org Georgia: Adoption of the new Foreign Agents Registration Act, available at: <https://www.fidh.org/en/region/europe-central-asia/georgia/georgia-adoption-of-the-new-foreign-agents-registration-act>.

²⁰ coe.int, see <https://bit.ly/4oRQg9S>.

²¹ publika.ge, NGOs: Six organisations have received a letter from the Anti-Corruption Bureau accusing them of violating the so-called FARA, available at: <https://publika.ge/ngo-ebi-6-ma-organizaciam-mivighet-antikorufciulis-werili-gvedavebian-e-w-fara-s-darghvevas/>.

²² civil.ge, Six civil society organisations state that they are being investigated under the Georgian version of FARA, available at: <https://civil.ge/ka/archives/697282>.



The media published the letters sent by the Bureau to these organisations.²³ The Bureau demanded an explanation as to why the organisations had not registered in the Foreign Agents Register and warned them of the criminal liability associated with failure to comply with this legal requirement. The Bureau also stated that, based on the information in its possession, part of the organisations’ funding came from foreign grants. According to the Bureau, under the provisions of FARA, their activities could be classified as “political activity,” which would mean they were subject to registration in the Foreign Agents Register.²⁴

The non-governmental organisations issued a joint and unequivocal response, declaring that they would not register as representatives of foreign interests, as their work was independent and aimed at protecting the interests of Georgian society. They also argued that the Bureau’s demands were not grounded in law (for example, its claimed authority to conduct inspections) and that such “inquiry” letters and related demands lacked any legal basis, since no provision of the Foreign Agents Registration Act granted the Bureau such powers.²⁵

The organisations further explained that receiving funding from abroad does not automatically imply the existence of external control or directives – elements that are essential for registration under the so-called FARA. They requested the Bureau to provide specific reasoning *as to which of their activities* had been deemed “political” and to clarify, based on its information, *which donors exercised what kind of control or issued what instructions* that led the Bureau to suspect a breach of the law.²⁶

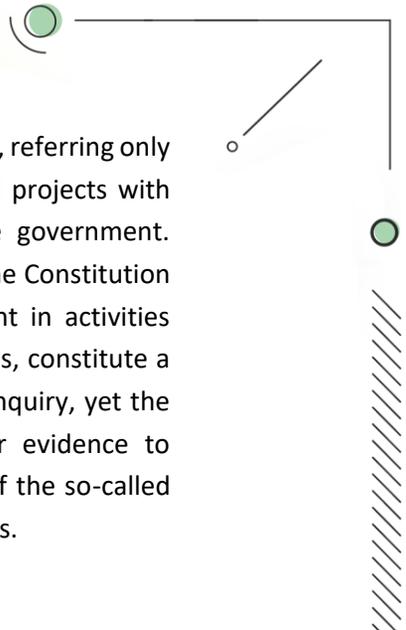
According to the organisations, their work is independent, guided by their own statutes and values. They have multiple donors, and their grant-funded projects are not subject to the donors’ substantive directives or specific instructions. They are not engaged in political activity and do not act under the direction or in support of any political party. This position is both logical and legally sound, as information about the sources, purposes, and content of these organisations’ projects is publicly available and known to state

²³ netgazeti.ge, The Ivanishvili–Kuprashvili Bureau continues its attack on civil society – NGOs, available at: <https://netgazeti.ge/news/782766/>.

²⁴ socialjustice.org.ge, The Georgian Dream party continues its persecution of civil society organisations – the Social Justice Center has published the text of its written explanation submitted to the Anti-Corruption Bureau, available at: <https://socialjustice.org.ge/ka/products/kartuli-otsneba-agrdzelebs-samokalako-sazogadoebis-organizatsiebis-devnas-sotsialuri-samartlianobis-tsentr-antikoruftsul-biuroshi-gagzavnili-tserilobiti-ganmartebis-teksts-akveqnebs>.

²⁵ mdfgeorgia.ge, Legal response of the Media Development Fund to Razhden Kuprashvili – why the actions of the Anti-Corruption Bureau are illegal, available at: https://www.mdfgeorgia.ge/geo/view_statements/872.

²⁶ socialjustice.org.ge, The Georgian Dream party continues its persecution of civil society organisations – the Social Justice Center has published the text of its written explanation submitted to the Anti-Corruption Bureau, available at: <https://socialjustice.org.ge/ka/products/kartuli-otsneba-agrdzelebs-samokalako-sazogadoebis-organizatsiebis-devnas-sotsialuri-samartlianobis-tsentr-antikoruftsul-biuroshi-gagzavnili-tserilobiti-ganmartebis-teksts-akveqnebs>.



authorities. The Bureau’s “inquiry” letter did not cite any specific violations, referring only to general circumstances – such as the implementation of grant-funded projects with foreign financing and the issuing of public statements critical of the government. However, neither under the provisions of the so-called FARA nor under the Constitution of Georgia does the public expression of one’s opinions or engagement in activities funded by foreign grants, in accordance with one’s own beliefs and values, constitute a violation of law. Several months have passed since the initiation of the inquiry, yet the Anti-Corruption Bureau has still not presented any concrete facts or evidence to substantiate claims that these organisations violated the requirements of the so-called FARA or to justify their inclusion in the Register of Foreign Influence Agents.

3.2 THE SECOND PHASE OF THE FIGHT AGAINST PUBLIC ORGANISATIONS

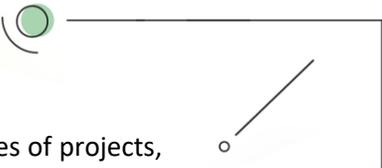
In June 2025 2025, the Anti-Corruption Bureau launched a new stage in its campaign against civil society organisations. Mr Razhden Kuprashvili obliged these organisations to provide information on the basis of a court order, invoking three laws: the Law on Combating Corruption, the Law on Citizens’ Political Associations, and the Law on Grants. Under these laws, the Bureau demanded a disproportionately large amount of information from the organisations. Although the court decision itself did not specify this, the organisations confirmed that, when applying to the court, the Bureau cited the Law on Foreign Agents as one of the legal grounds for its request.²⁷

Based on the relevant court orders, the organisations were required to submit to the Anti-Corruption Bureau all documentation in their possession covering their activities from 1 January 2024 to 10 June 2025.

The request specifically concerned the following materials:

- Grant agreements concluded or in force during this period, together with related financial and legal documentation, including detailed budgetary data and project financial planning;
- Descriptions of the activities carried out under these agreements or arrangements, including objectives, location, timeframe, the identities of the persons involved (including beneficiaries) with identifiable data (name, surname, personal number), achieved results, and photographic or video materials documenting the events;

²⁷ socialjustice.org, The Georgian Dream party has already begun enforcing laws that are destructive to civil society, 19.06.2025, see <https://socialjustice.org.ge/ka/products/kartulma-otsnebam-samokalako-sazogadoebistvis-damangreveli-kanonebis-gamoqeneba-ukve-daitsqo>.

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- Narrative reports on the implementation of grant-funded or other types of projects, as well as correspondence and communication archives for the same period, if such exchanges were documented in written form; and
 - Information on the natural and legal persons who cooperated with these organisations or provided them with relevant services.

In its motions submitted to the court, the Anti-Corruption Bureau typically justified the legality and purpose of requesting information by referring to its general authority, which allows it, where necessary, to request information from both natural and legal persons, including special categories of personal data, for the purpose of performing the functions defined within its mandate.

The motions particularly emphasised that the requested materials were to be used for the following purposes:

1. monitoring the financial activities of political associations, electoral subjects, and persons pursuing electoral objectives;
2. overseeing the processes of receiving and issuing grants, as well as other related matters; and
3. implementing the mechanisms defined by the Law of Georgia on the “Foreign Agents Registration Act.”

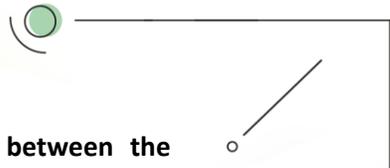
However, the motions did not specify the grounds for selecting the particular period from 1 January 2024 to 10 June 2025, nor did they explain the necessity and proportionality of requesting each specific type of information – especially the personal and sensitive data of beneficiaries. The Bureau failed to provide additional reasoning to demonstrate that the information request served concrete, clear, and legitimate purposes, or that it remained within the limits of its authority.

In justifying the collection of information from civil society organisations, the courts cited three main legal grounds in their decisions. Yet each of these grounds – both in substance and in law – is irrelevant, unsubstantiated, and fundamentally unlawful.

1. REQUESTING INFORMATION FOR THE PURPOSE OF COMBATING CORRUPTION IN THE PUBLIC SERVICE

As the first legal basis, the court referred to Article 201³ of the Law of Georgia on Combating Corruption, which grants the Anti-Corruption Bureau the authority to request information from various entities for the purpose of identifying and preventing corrupt practices within the public sector.

However, in this particular case, the court **neither examined nor substantiated** whether the requested data were in any way related to a **suspected instance of corruption in the**



public service, nor did it establish any legal or factual connection **between the information held by civil society organisations and the monitoring of the public sector**. Accordingly, the application of this article in this context **is legally unsubstantiated and disproportionate**.

2. MONITORING OF ELECTORAL SUBJECTS' FINANCES

As the second basis, the court cited Article 34¹ of the Organic Law of Georgia on Citizens' Political Associations, which regulates the monitoring of the financial activities of electoral subjects and persons declaring electoral objectives.

In this case, however, the court failed to explain **what legal or factual connection exists between the declared electoral objectives and the civil society organisations from which information was requested**. There is no indication that these organisations fall within the scope of this provision or correspond to its target category.

The court also did not assess whether requesting **beneficiaries' personal data** under this provision was proportionate or justified by purpose. Moreover, the period specified in the motion (from 1 January 2024 to 10 June 2025) **does not fully coincide with the electoral cycle**, further undermining the legal legitimacy of the request

3. MONITORING OF GRANTS RECEIVED WITHOUT PRIOR AUTHORISATION

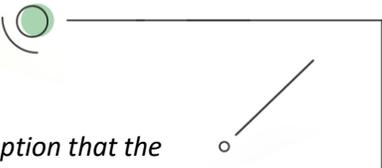
The third legal basis concerns Article 6¹ of the Law of Georgia on Grants, which authorises the Anti-Corruption Bureau to monitor the process of granting and receiving grants in cases where the grant is issued without the prior authorisation of the Government of Georgia.

However, it should be noted that this regulation **entered into force only on 17 April 2025**. Accordingly, the court's decision to extend the information request to the period **from 1 January 2024 to 17 April 2025** – when the provision was not yet in effect – **is inconsistent, devoid of legal force**, and entirely irrelevant in view of the statutory timeframes.

3.3 LAW ON GRANTS

Since April 2025, following the amendments to the Law of Georgia on Grants, the Anti-Corruption Bureau has been granted broad powers in the area of monitoring. Under the amendments, the Bureau is authorised to oversee the issuance and receipt of foreign grants made without prior authorisation, including the right to request various types of information from natural and legal persons as well as from public institutions.

Specifically, under subparagraphs “a” and “d” of paragraph 3, and paragraph 5 of Article 6¹ of the Law, the Anti-Corruption Bureau is authorised to:

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- *Request a financial report from a person if there is a reasonable presumption that the person is violating the obligations set out in Article 5¹ of the Law; and*
 - *On the basis of a court decision, obtain special categories of personal data and other types of sensitive information from entities in both the public and private sectors.*

However, in exercising these powers, it is critically important to uphold the legal standards and principles derived from the Constitution of Georgia, the European Convention on Human Rights, and the best international practices.

One of the key principles is the “standard of reasonable presumption,” which means that any request for information by the Bureau must be based on specific circumstances and objective data providing a rational basis to believe that a violation of the law or a failure to comply with legal obligations has occurred. Only under such conditions can the collection of data and monitoring be justified.

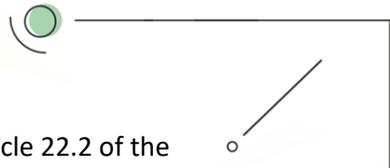
Nevertheless, the Anti-Corruption Bureau applies this already repressive law in practice contrary to the spirit and purpose of its provisions. Since September, the Bureau has been actively addressing registered non-governmental organisations,²⁸ requesting various categories of information in a manner that does not even formally comply with legislative requirements.

Unfortunately, in practice, it is common for the Bureau’s requests to fail to meet this standard. For instance, the letters do not specify which article of the Law on Grants is allegedly being violated, nor do they indicate what circumstances constitute the “reasonable presumption” of a violation. Such ambiguity creates the impression that the Bureau is attempting to collect large-scale information without a concrete legal basis. All letters sent to the organisations are identical in wording. Moreover, after the organisations responded that they had not received or amended any new grants or grant agreements, the Bureau appealed to the court, which, in a routine manner, granted all of the Bureau’s applications.

The court orders themselves contain no legal reasoning to justify why the Bureau should obtain this type of information – information that, on the one hand, falls entirely outside the Bureau’s mandate and, on the other, lacks any statutory basis under the “standard of reasonable presumption.”

The letter from the Anti-Corruption Bureau and the corresponding court order requested information dating back to 16 April 2025, at a time when the repressive amendments to the Law of Georgia on Grants had not yet entered into force. Specifically, these amendments were published on the official website of *Sakanonmdeblo Matsne* (the

²⁸ radiotavisupleba.ge, The Anti-Corruption Bureau is already requesting information from 30 organisations, while NGOs regard the Bureau’s demands as a form of repression, 22.09.2025, see <https://www.radiotavisupleba.ge/a/33536858.html>.



Legislative Herald of Georgia) on 16 April 2025; however, according to Article 22.2 of the Law of Georgia on Normative Acts, a normative act enters into force 24 hours after its publication. Therefore, the repressive legislative amendments became effective on 17 April 2025. The court, however, did not address this circumstance at all.

Civil society organisations also refused to provide personal data, including data of a special category. In accordance with the current legislation of Georgia – namely, Articles 3 and 6 of the Law of Georgia on Personal Data Protection – special category data refers to “data relating to a natural person’s racial or ethnic origin, political opinions, religious, philosophical, or other beliefs, trade union membership, health, sexual life, status as a suspect, accused, convicted, acquitted, or victim in criminal proceedings, conviction, criminal record, diversion, recognition as a victim of human trafficking or of a crime under the Law of Georgia on the Elimination of Violence against Women and/or Domestic Violence, Protection and Assistance of Victims of Violence, imprisonment and execution of a sentence, as well as biometric and genetic data processed for the unique identification of a natural person.” Moreover, the processing of special category data must have a specific legal basis, be explicitly provided for by a special law, and constitute a necessary and proportionate measure in a democratic society; otherwise, it constitutes a violation of legal requirements.

Monitoring and oversight mechanisms are only effective and legitimate when they rest upon a proper legal foundation, transparency, and respect for citizens’ rights. Otherwise, the instruments originally designed for combating corruption risk becoming tools of pressure against civil society and critical thought.

3.4 OTHER LEVERS FOR FIGHTING AGAINST PUBLIC ORGANISATIONS

Under the Law of Georgia on Combating Corruption, one of the functions of the Anti-Corruption Bureau is to monitor the financial activities of citizens’ political associations (political parties), electoral subjects, and persons with declared electoral objectives, as well as to carry out other relevant measures in this field.

This function is important because it ensures transparency and accountability in political processes, preventing corrupt practices and unlawful financial influence on the activities of political parties and electoral subjects. Financial monitoring by the Anti-Corruption Bureau reduces the risk of covert funding, increases public trust, and contributes to fair and democratic elections.

At first glance, this significant mandate – intended to promote democratic processes in the country – was once again used by the Bureau as a tool against human rights organisations. During the pre-election period of 26 October 2024, Mr Razhden Kuprashvili

designated, among others, Transparency International Georgia and the civic movement “Choose Europe” as entities with electoral objectives and imposed upon them the restrictions envisaged under Chapter III of the Organic Law of Georgia on Citizens’ Political Associations.²⁹

Under the law, a political party *is a voluntary and independent association of citizens, founded on shared ideological and organisational principles, registered in accordance with the procedures established by this law, and operating within the framework of the Constitution of Georgia and other legislative and secondary legislative acts.*

Mr Razhden Kuprashvili justified his decision by referring to the provision of the Law on Citizens’ Political Associations³⁰ which states that political associations must have a “declared electoral objective” – defined as “a factual circumstance indicating a specific person’s intention to come to power through participation in elections. The declaration must be made publicly and aimed at shaping public opinion.” According to him, “these organisations are actively involved in pre-election campaigns aimed at supporting specific political parties or calling on the public to refrain from supporting certain political parties.” He further claimed that they “raise funds, meet with the population, presumably for political purposes, and create social media groups that serve to influence the political attitudes of the public.” Mr Kuprashvili added that these organisations “organise concerts in the regions and produce and distribute political videos, which involve financial expenditures exceeding GEL 100,000.³¹ These resources are used to shape specific political attitudes among the population and to influence public opinion during the pre-election period.”³²

²⁹ See <https://youtu.be/CR5liy-0sAY?si=AQN5D1xNgvD7nGrL>.

³⁰ Law of Georgia on Political Associations of Citizens, Article 71.

³¹ acb.gov.ge, see

https://acb.gov.ge/files/biuro/%E1%83%A1%E1%83%98%E1%83%90%E1%83%AE%E1%83%9A%E1%83%94%E1%83%94%E1%83%91%E1%83%98/antikorufciuli%20biuros%20ufrosis%20gadawyvetileba_029.pdf.

³² acb.gov.ge, see

https://acb.gov.ge/files/biuro/%E1%83%A1%E1%83%98%E1%83%90%E1%83%AE%E1%83%9A%E1%83%94%E1%83%94%E1%83%91%E1%83%98/antikorufciuli%20biuros%20ufrosis%20gadawyvetileba_028.pdf.

4. INCREASE IN THE BUDGET OF THE ANTI-CORRUPTION BUREAU OF GEORGIA AND THE REASONS BEHIND IT

Under the Law of Georgia on the State Budget for 2025, the budget of the Anti-Corruption Bureau amounts to GEL 13,200,000.³³ There has been an increase of GEL 4,700,000 compared with the previous year's allocation. It is noteworthy to consider what has caused such a substantial rise in funding. Under the draft Law on the State Budget for 2026, the Bureau's budget is set at GEL 14,500,000.³⁴

Since its establishment, the Bureau has been assigned a number of additional functions, which have ultimately transformed it into an instrument serving the interests of the Georgian Dream party. These are precisely the functions that the institution now performs most actively.

Following October 2024 – after the large-scale falsification of parliamentary elections – the expansion of the Bureau's mandate became an increasingly discussed issue. In April 2025, the one-party parliament incorporated the enforcement of the Foreign Agents Registration Act, modelled on the American FARA, into the mandate of the Anti-Corruption Bureau, adopting the law within seconds and without any discussion.³⁵ In the same month, through the repressive amendments introduced by the same one-party parliament to the Law of Georgia on Grants, non-governmental and media organisations were required to obtain prior government authorisation before receiving a grant, with the Bureau tasked with monitoring this process.³⁶ In this context, the amendment to the Law on Combating Corruption is particularly significant, as it includes a general provision authorising the Anti-Corruption Bureau to exercise “other powers defined by the legislation of Georgia.”³⁷ This formulation, of course, provides an easy avenue for expanding the Bureau's mandate and is inherently vague, allowing it to assume functions that are incompatible with its original objectives and purpose.

³³ matsne.gov.ge, Law of Georgia on the State Budget of Georgia for 2025, see <https://matsne.gov.ge/document/view/6366063?publication=0>.

³⁴ parliament.ge, see <https://www.parliament.ge/legislation/31282>.

³⁵ radiotavisupleba.ge, The Georgian Dream party passed the so-called FARA law on its third reading, amended the media law, removed the term “gender” from legislation, and reintroduced the article on “treason,” see <https://www.radiotavisupleba.ge/a/33366352.html>.

³⁶ radiotavisupleba.ge, Georgian Dream Bans Grants Without Government Permission, see <https://www.radiotavisupleba.ge/a/33387188.html>.

³⁷ Law of Georgia on Amendments to the Law of Georgia on Combating Corruption, 16 April 2025, *Sakanon-mdeblo Matsne* of Georgia, see <https://matsne.gov.ge/ka/document/view/6474447?publication=0>.