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# **THE MECHANISMS OF CONTROL OF THE STATE SECURITY SERVICE OVER PUBLIC AND PRIVATE INSTITUTIONS**

**2022**



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## Introduction

Active reserve officers (the so-called ODRs)<sup>1</sup> were covert members of the KGB<sup>2</sup> who worked in various positions (such as a deputy director or an official in charge of international relations) at scientific and research institutes, educational and other institutions.<sup>3</sup> Their task was to provide information, in exchange of remuneration, to the security committee. This information was used not to investigate crimes but to find out about political views and attitudes of employees.<sup>4</sup>

The concept of the so-called ODRs was introduced in Georgia in the period of the Soviet Union. However, this practice has not been discarded to this day. In 2016, the rector of the Tbilisi State University also confirmed the existence of an ODR in the university. As some students alleged, the ODR was actively involved in the internal affairs of the university and in the election of the university chancellor.<sup>5</sup> However, this was not an isolated example of a security service representative working in a public institution. It had been preceded by numerous instances where security authorities had their representatives in public institutions, as confirmed by the non-governmental sector.<sup>6</sup>

Secondment of security personnel to public institutions actually serves the political security of the ruling power. It is aimed at identifying political dissent. This vicious practice is incompatible with the principles of the rule of law. Another threat posed by this practice is a low level of accountability and the lack of oversight mechanisms.

Stemming from the importance of the issue at stake, the purpose of this research is to examine the impact of the State Security Service on public agencies, legal entities of public law (hereinafter “LEPLs”) and private institutions, including the legislative basis for planting the so-called ODRs by the State Security Service, the practice of their appointment in various agencies. Our objective is to analyse and share with public the risks that accompany the use of the political police methods (created by security services in the Soviet era) in democracies in transition.

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<sup>1</sup> An acronym formed from a Russian name (офицер действующего резерва (ОДР)).

<sup>2</sup> Committee for State Security of the Soviet Union, an acronym formed from a Russian name (Комитет государственной безопасности).

<sup>3</sup> Yevgenia Albats, *the State, Within a State, the KGB and Its Hold on Russia, Past, Present and Future*, p 56.

<sup>4</sup> *Ibid.* pp. 58-59.

<sup>5</sup> Democracy and Freedom Watch, *What are ODRs*, available at: <https://bit.ly/3ruihLN> (accessed on 08.10.2021).

<sup>6</sup> *Security Officers (ODRs) – A Vicious Practice, 2014*, available at: <https://www.transparency.ge/ge/content/stub-565> (accessed on 08.10.2021); also *ODRs in Batumi State University*, available at: <https://edu.aris.ge/news/odeerebi-batumis-saxelmwifo-universitetshi.html> (accessed on 10.08.2021).

## Methodology

The report aims at studying the influence of the State Security Service over the public institutions, also, statutory grounds for “secondment” by the State Security Service of its representatives, the so-called ODRs to various agencies and the practice of their appointment.

For the analysis of research issues, the research framework is based on the following tools and methodology:

**Desk Research** – the research is based on the analysis of documents developed by international and local experts/organisations in accordance with the security system reform, human rights and good governance principles as well as the Public Defender’s reports and recommendations to the Georgian authorities.

**Analysis of Legislation** – the authors of the research studied both primary (new versions currently in force and old versions) and secondary legislation governing the appointment of representatives of the State Security Service and their activities in various agencies, and analysed policy documents, reform documents and visions at different times.

**Workshops and Meetings** – work meetings were held with organisations and experts working on topical issues for research who possess significant knowledge and experience for research purposes. The authors of the study conducted individual in-depth interviews with representatives of academia and former employees of the State Security Service.

**Descriptive Statistics Analysis** – the research is based on the data obtained from agencies as public information and as a result of the study of legislative regulations and the analysis of information posted on the websites of public agencies.

The DRI requested public information from ministries and under-agency institutions, legal entities of public law, the State Agency for Religious Affairs and trade unions as well as institutions established with the participation of the state.

The DRI requested the following information from all ministries of Georgia:

- Identity of advisors to all the ministers and deputy ministers; information about their work experience (curriculum vitae);
- Copies of legal acts regarding the appointment of advisors to the ministers and deputy ministers; information about their salary and salary increments; and
- Job descriptions and qualification requirements of the persons appointed to these positions.

For the purposes of the research, representatives of the State Security Service are referred to in the report as “representatives of the service” (in accordance with the Law of Georgia on the State Security Service of Georgia) or as ODRs as in common parlance. To avoid confusion regarding the

terminology, it is important to note that, prior to the 2015 reform of the Ministry of the Interior, individuals performing the tasks of ODRs were called “security officers”.

## 1. Review of Legislation Regarding Representatives of the State Security Service

Until the 2015 reform of the Ministry of Internal Affairs, “security officers” (so-called ODRs) were appointed by the Minister of Internal Affairs in public agencies and private institutions.<sup>7</sup> After the State Security Service was separated from the Ministry of Internal Affairs and formed as an independent agency, this service was vested with the power to appoint and supervise/control its representatives in various institutions. However, instead of an actual reform, the legislative amendments carried out after 2015 regarding the secondment by the State Security Service of its representatives in public agencies and private institutions only legalised the appointment of ODRs by the service.

### 1.1. The Law of Georgia on the State Security Service

The main purpose of the State Security Service is to ensure state security, which is managed by a broad mandate vested by law. This mandate, among other tasks, includes prevention (carrying out preventive measures, identification, prevention and investigation) of crimes falling within the investigative jurisdiction of the service.

In order to ensure state security, the service is also entitled to carry out special statutory measures in particular public agencies and private institutions. This includes, *inter alia*, establishing a security regime for entities posing a high risk to state security, in particular public agencies and private institutions; controlling its implementation, establishing an effective system for the exchange of information and, at the request of these entities,<sup>8</sup> concluding a cooperation agreement with them.<sup>9</sup>

The Law of Georgia on the State Security Service of Georgia gives virtually no information about the service’s representatives and their tasks and responsibilities. The only provision of the law that legalises the work of ODRs in public and private entities concerns the appointment of an ODR within

<sup>7</sup> The Statute of the Ministry of Internal Affairs, as of 30 July 2015, Article 5.2.p).

<sup>8</sup> The list of the entities posing a high risk to state security is determined by Resolution no. 584 of the Government of Georgia of 2015. The resolution is discussed in detail in subchapter 1.2.

<sup>9</sup> The Law of Georgia on the State Security Service of Georgia, Article 22.

a cooperation agreement with high-risk entities, with the sole task of monitoring the implementation of the security regime.<sup>10</sup>

*The Security Regime* - The Head of the State Security Service individually determines the security regime for the entities posing a high risk to state security.<sup>11</sup> Under the Law of Georgia on the State Security Service of Georgia, the security regime is a confidential document with a binding force.<sup>12</sup> The confidentiality of the document and individual determination of the security regime by the Head of the State Security Service could be posing a threat due to the lack of control over this process. Under the legislation in force, parliamentary oversight of the State Security Service is extremely limited. Under the legislation in force, the Head of the State Security Service is obliged to appear at a hearing of the parliamentary committee, answer the questions posed at the hearing<sup>13</sup> and present a report on annual activities of the service.<sup>14</sup> However, not all MPs have access to classified information. Furthermore, due to the covert nature of the security regime, it is impossible to oversee properly its need and the adequacy and expediency of the measures for its implementation. Because of the legislative shortcomings and the lack of political will, the State Security Service is not properly controlled in practice.<sup>15</sup> Therefore, individual determination of the security regime and the confidential character of the document imply a broad mandate for the Head of the State Security Service.

*Cooperation Agreements* – a cooperation agreement concluded between the high-risk entities and the State Security Service may determine the appointment of the service’s representatives for the monitoring the security regime in this entity.<sup>16</sup>

In accordance with the law, representatives of the State Security Service, appointed by the service in various public agencies and private institutions, supervise the observance of the security regime, thereby promoting the interests of the state.

However, the existing practice suggests that ODRs most likely obtain information and provide it to the State Security Service illegally. This information might be of interest to the service and could include data that is illegal in terms of obtaining/processing and does not correspond to the actual objectives of the representatives’ activities (details about political views of employees, their social connections, information on their personal and intimate life, etc.).<sup>17</sup>

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<sup>10</sup> *Ibid.*, Article 22.3.a).

<sup>11</sup> *Ibid.*, Article 6.2.l).

<sup>12</sup> Article 22.2.

<sup>13</sup> The Statute of the Parliament of Georgia, Articles 40, 152.

<sup>14</sup> The Law of Georgia on the State Security Service of Georgia, Article 9.2.

<sup>15</sup> DRI, 2020, Mechanisms of Parliamentary Oversight of the State Security Service of Georgia and Their Significance.

<sup>16</sup> The Law of Georgia on the State Security Service of Georgia, Article 22.3.a).

<sup>17</sup> The files made public on 12 September 2021 once again gives rise to serious suspicions that the service controls fully all the strata of society through illegal wiretaps, available at <https://publika.ge/savarudod-susidan-gadjonili-faruli-chanawerebi-rogoria/>.

## 1.2. Resolution of 18 November 2015

Prior to the adoption of Resolution no. 584 of the Government of Georgia, the Ministry of Internal Affairs was entitled to appoint security officers in any public/private entity. In particular, the resolution of the Ministry of Internal Affairs entitled the minister to appoint security officers “in public agencies and bodies of special importance”.<sup>18</sup> However, none of the legal acts specified which organisations were of particular importance in terms of state security.

The 2015 resolution of the Government of Georgia was adopted, within the reform implemented in 2015, based on the Law of Georgia on the State Security Service of Georgia. The resolution determined the list of the entities to which the State Security Service appoints its representatives. The resolution covers 25 such entities.<sup>19</sup>

At first glance, the process has become more transparent. However, in practical terms, the changes have exacerbated the problem. A clear example of this is how the events unfolded at Tbilisi and Batumi<sup>20</sup> State Universities in 2016. While educational establishments are not on the list determined by the resolution, information has been repeatedly voiced that a so-called ODR worked at the Tbilisi State University,<sup>21</sup> which was later confirmed by the rector of the university.

It is noteworthy that the main argument adduced by the State Security Service to deny the existence of an ODR in the university was that educational institutions are not on the list determined by the 2015 resolution.<sup>22</sup> Consequently, the practice shows that, beyond the exhaustive list of entities determined by the governmental resolution, the State Security Service continues the vicious practice of planting its representatives in public institutions, which should be considered as a significant step backwards in terms of legal certainty. Furthermore, as the activities of the State Security Service are highly secretive, the service possesses concentrated extensive power (including the so-called key to wiretapping), and there are no effective mechanisms for democratic oversight, the mandate of appointing a representative in private/public institutions may become the ground for legitimising mass surveillance. This is especially true considering that the public has no legal mechanism at its disposal to control the use of its resources and capacities by the service, including what kind of information ODRs process and the nature of their work.

<sup>18</sup> The Statute of the Ministry of Internal Affairs of Georgia, as of 30 July 2015, Article 5.2.p).

<sup>19</sup> Resolution no. 584 of the Government of Georgia of 18 November 2015.

<sup>20</sup> Aris.ge (website), 2016, ODRs in Batumi State University, available at: [ოდეერები ბათუმის სახელმწიფო უნივერსიტეტში \(aris.ge\)](http://aris.ge) (accessed 24.01.2022).

<sup>21</sup> liberali.ge (website), <http://liberali.ge/articles/view/21628/NGOebi-tsushi-odeerebis-sakitkhze-parlamentshi-sagamodziebo-komisia-unda-sheiqmnas>.

<sup>22</sup> Real Space (Facebook page), 2016, The Official Response of the State Security Service to the Allegations of ODRs Planted in TSU, available at: <https://www.facebook.com/notes/261907575184291/>.

## 1.3. Publicity of an Asset Declaration

Under Article 14.1 of the Law of Georgia on Conflict of Interest and Corruption in Public Agencies, a person shall submit an official's asset declaration to the Civil Service Bureau within two months after his/her appointment. Under Article 2 of the same law, the term "official" also includes the Head of the State Security Service and his/her deputies, the heads and deputy heads of structural units of the State Security Service of Georgia, chief administrations and administrations within these structural units, as well as persons equivalent to them. The Civil Service Bureau is obliged to ensure the publicity of asset declarations.<sup>23</sup>

Under the original version of the law, any person had the right to request and to receive a copy of the declaration of any official. This right did not extend to the personal number, permanent residence address, telephone number and a confidential column of the declaration.<sup>24</sup> However, by virtue of the amendments of 1 January 2017, asset declarations of those officials whose position is assigned a security classification marking under the Law of Georgia on State Secrets have been completely classified.<sup>25</sup> The problem is exacerbated by the fact that the law does not specify the list of concrete positions, which allows public institutions to interpret the law broadly and unreasonably when classifying declarations.

## 2. Analysis of Information Received from Public Institutions

### 2.1. Analysis of the Information Received from the State Security Service and Related Problems

Under the Law of Georgia on the State Security Service of Georgia, the service is authorised, in case of a written application, to conclude a cooperation agreement with an entity posing a high risk to state security".<sup>26</sup> As mentioned above, this agreement may provide for the appointment of a service representative in that entity to monitor compliance with the security regime.<sup>27</sup> According to the 2015 report of the State Security Service, the status concerned was defined by a governmental resolution for 25 entities and an appropriate regime was established for each of them, depending on the specifics. At the same time, according to the report, the relations of the State Security Service with

<sup>23</sup> The Law of Georgia on Civil Service, Article 20.1.

<sup>24</sup> The Law of Georgia on Conflict of Interest and Corruption in Public Agencies Article 19, the version in force before 1 January 2017, <https://matsne.gov.ge/ka/document/view/33550?publication=52>.

<sup>25</sup> The Law of Georgia on Conflict of Interest and Corruption in Public Agencies, Article 19.1.

<sup>26</sup> The Law of Georgia on the State Security Service of Georgia, Article 22.1.d).

<sup>27</sup> The Law of Georgia on the State Security Service of Georgia, Article 22.3.a).

high-risk entities are based on the respective agreements. Thereby, the institution of so-called ODRs was finally abolished.<sup>28</sup> The 2016 report of the State Security Service states that a cooperation agreement provides for the secondment of a representative of the State Security Service to the relevant entity for rendering corresponding assistance and consultation on state security issues.<sup>29</sup>

The conclusion of a cooperation agreement with the State Security Service by the entities provided by the governmental resolution is voluntary. To determine the extent to which entities are exercising this power, the DRI has written to all 25 entities posing a high risk to state security as provided for by a governmental resolution and requested the following information:

- A copy of the application sent by the relevant entity to the State Security Service for the conclusion of a cooperation agreement, if any; and
- The date of the conclusion of a cooperation agreement between the entity and the State Security Service and its validity period.

The DRI also applied in writing to the State Security Service and requested the list of entities, with which a cooperation agreement had been concluded, as well as the date of conclusion of agreements and their validity period. The majority of entities responded past the deadline set by the General Administrative Code. The Ministry of Economy and Sustainable Development, the Ministry of Foreign Affairs, the Public Service Development Agency, the Special Penitentiary Service and the Tbilisi Municipality did not respond to the letters requesting public information. United Airports of Georgia LLC and JSC Georgian Railway refused to provide public information based on the following argument: they are not an administrative body and are obliged to provide public information only on the funding received from the state budget. United Airports of Georgia LLC also pointed out that, within the framework of the funds received from the state budget, no agreement had been concluded with the State Security Service regarding Kutaisi, Batumi and Mestia International Airports or other entities posing a high risk to state security.<sup>30</sup>

As a result of the analysis of the received information, the following was established:

- The majority of cooperation agreements (nine agreements) are concluded in 2016;
- Cooperation agreements are concluded for a year and are extended automatically unless one party notifies the other party about the cancellation of the agreement;
- No facts of terminating cooperation agreements at the initiative of either party was revealed in the research period;
- According to the information provided only the National Probation Agency has not concluded a cooperation agreement with the State Security Service;
- Provided the information received from JSC Georgian Railway and United Airports of Georgia LLC is reliable, a cooperation agreement is not concluded with JSC Georgian Railway and United Airports of Georgia LLC, or the services of a representative seconded by the State Security Service is not be reimbursed from the state budget; and

<sup>28</sup> The 2015 Report of the State Security Service, p. 10.

<sup>29</sup> The 2016 Report of the State Security Service, p. 11.

<sup>30</sup> Letter no. 252 of United Airports of Georgia LLC, dated 10 May 2021.

- On a number of occasions, incidents of concluding a cooperation agreement with unauthorised entities were identified.

### 2.1.1. The List of Entities of Critical Importance Treated as the Information Related to Operative and Investigative Measures

By a letter of 1 June 2021, the State Security Service declined to give us the list of those entities with which a cooperation agreement is concluded in accordance with the Law of Georgia on the State Security Service of Georgia and Resolution no. 584 of the Government of Georgia of 18 November 2015. Accordingly, we were also refused to be given information on the date of conclusion and the validity period of cooperation agreements that are concluded with those entities that are referred to in the resolution as posing a high risk to state security.

According to the State Security Service, the date of the conclusion of a cooperation agreement, its terms and other details, “constitute a part of the agreement concluded regarding cooperation between two independent actors of a legal relation and therefore, the State Security Service is deprived of any possibility to make them known to other parties.”<sup>31</sup>

The above argument is ill-founded. A cooperation agreement is concluded between the State Security Service and entities posing a high risk to state security, as determined by Resolution no. 584 of the Government of Georgia, to ensure state security. For the same purpose, under this agreement, the State Security Service may appoint a representative to a particular entity. This agreement is not a transaction that serves a private interest (regardless of who the other party to the agreement is – a public or private legal entity). On the contrary, the service, through a representative, ensures the protection of the public interest, i.e., the interests of state security.

Under Article 2.1) of the General Administrative Code, public information is an official document, i.e., any information stored at a public institution, as well as any information received, processed, created or sent by a public institution or public official in connection with official activities and also any information proactively published by any public institution. Under the Constitution of Georgia, everyone has the right to be familiarised with information about him/her, or other information, or an official document that exists in public institutions in accordance with the procedures established by law, unless this information or document contains commercial or professional secrets, or is acknowledged as a state secret by law or in accordance with the procedures established by law as necessary in a democratic society to ensure national security or public safety or to protect the interests of legal proceedings.

The requested data constitute public information and does not fall within the category of state, professional and/or commercial secrets. Because of the above circumstances, an application is

<sup>31</sup> Letter no. SSG 0 21 00069032 of the State Security Service, dated 11 May 2021.

pending before Tbilisi City Court, which was lodged by the DRI against the State Security Service. It should be noted that the service changed its position in the rebuttal filed with the court. This time the service pointed out that entering contractual relations with other entities in the given form is related to its operative and investigative activities, constitutes the legal basis for these measures and, accordingly, the safeguards provided for in the Constitution of Georgia and the General Administrative Code concerning accessibility of public information do not apply to it.

This position is ill-founded as well. It constitutes a formulaic interpretation of the provision concerned and contradicts the legislation of Georgia and international standards. Under the law, operative and investigative activities, their tasks, legal grounds as well as the list of established measures can be changed or complemented only by virtue of the respective law. These grounds are not related to ensuring security of entities posing a high risk to state security. The State Security Service failed to demonstrate in its rebuttal that the list of the entities with which a cooperation agreement is concluded and the agreements themselves either formally or substantively are related to carrying out operative and investigative measures.

### 2.1.2. Cases of Concluding a Cooperation Agreement with Unauthorised Entities

The research revealed that there could be cases where the State Security Service concluded cooperation agreements with certain unauthorised entities.

The State Security Service is authorised to conclude a cooperation agreement with an entity posing a high risk to state security in case the entity requests it in writing.<sup>32</sup> At the same time, according to the 2015 report of the State Security Service, the institution of ODRs was rejected in Georgia due to the approval of the list of entities posing a high risk to state security, after which a specific regime was determined for each of them and relations with them were based solely on a contract.<sup>33</sup> A cooperation agreement, therefore, can be concluded if a) the entity is on the list of entities posing a high risk to state security as determined by a governmental resolution and b) the free will to conclude a cooperation agreement is clearly expressed by the respective entity.

It was revealed during the research that a number of entities envisaged by the governmental resolution (Kutaisi Airport, Mestia Airport) do not have the status of a legal entity and cannot enter the respective legal relation. Therefore, in these cases, a cooperation agreement can be concluded not with a high-risk entity for state security (which is not a legal entity), but with the United Airports of Georgia LLC mainly tasked to ensure technical supervision of the activities carried out by airports of Georgia.

This raises the question of whether the entity, or the owner organisation, can conclude a cooperation agreement with the State Security Service, given that the owner of the entity concerned is not on the list of entities posing a high risk to state security. At the same time, if a cooperation agreement can be concluded with any legal entity that has a connection with the entities listed in the resolution, it

<sup>32</sup> The Law of Georgia on the State Security Service of Georgia, Article 22.2.d).

<sup>33</sup> The 2015 Report of the State Security Service, p. 10.

means that the list defined by the governmental resolution is not exhaustive. Such an assumption contradicts the objective of the legislature to limit in express terms, by virtue of the governmental resolution, those entities that pose a high risk to state security. An exhaustive list should have limited the power of the State Security Service to conclude cooperation agreements with any entity, to establish a mandatory security regime for implementation, and appoint representatives of the service to ensure the implementation of this regime. Therefore, conclusion of a cooperation agreement with another legal entity of critical interest is a clearly flawed practice, especially if a particular entity has several owners or its representative authority is redistributed to different entities.

### 2.1.3. Contents of a Cooperation Agreement and Oversight Mechanisms for the Service's Representatives

A thorough analysis of public information received from entities posing a high risk to state security demonstrates that apart from monitoring the security regime, the State Security Service is also authorised to control confidential correspondence of the entity and to monitor on a regular basis the compliance with the rules on dealing with information classified as a state secret. In order to protect information classified as a state secret, the service has a number of powers, including providing access to state secrets only to persons who need it for carrying out their official duties. The service is also authorised to use the technical means provided for by law to prevent the disclosure of classified information.<sup>34</sup> It is noteworthy that under the agreement, the entity is obliged to reimburse the costs of communication, transportation, fuel and other necessary expenses of the representatives of the State Security Service in order to ensure the security regime is followed.<sup>35</sup> Consequently, the burden of reimbursing the costs provided for in the cooperation agreement falls entirely on the entity posing a high risk to state security. When it comes to legal entities under private law, it is impossible to request and analyse public information on this issue as in accordance with the rule under Article 27.a) of the General Administrative Code, a legal person under private law is only obliged to impart public information within the funding received from the state or local budget.

It is particularly alarming that under the cooperation agreement, the State Security Service is authorised to monitor non-confidential official correspondence of employees of high-risk entities.<sup>36</sup> Preventing the disclosure of classified information is not the basis for operative and investigative or covert investigative measures. Consequently, the lawfulness of the processing of non-confidential official correspondence by the State Security Service is not controlled by the prosecutor's office or the court. The State Inspector's Service generally supervises these activities. However, the service's

<sup>34</sup> Letter no. 01/5530 of the Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs, dated 19 April 2021.

<sup>35</sup> *Idem*.

<sup>36</sup> Letter no. 01/5530 of the Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs, dated 19 April 2021.

2020 report, does not enlist the State Security Service among the institutions that have been monitored by the State Inspector's Service.<sup>37</sup>

In light of the above and bearing in mind the abolition of the State Inspector's Service in December 2021, there are no appropriate oversight mechanisms for monitoring by the State Security Service of non-confidential official correspondence maintained by entities posing a high risk to state security. This gives rise to significant risks to the right to respect for private life of the staff of these entities. It should be noted that an entity posing a high risk to state security, with few exceptions, cannot monitor non-confidential official correspondence of employees, therefore, it is impossible to transfer this right to the State Security Service.

Under the case-law of the European Court of Human Rights, official telephone calls and business correspondence are protected by Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms. Similarly, emails sent through the service's e-mail, as well as information received as a result of the use of the Internet, are protected. On a number of occasions, the Court found a violation where applicants had been given no warning that their calls would be liable to monitoring; therefore, they had a reasonable expectation as to the privacy of calls made from their work telephone.<sup>38</sup>

The mandate of the State Security Service does not allow the service to monitor non-confidential official correspondence, including the correspondence maintained in entities posing a high risk to state security. The transfer of such a right to the State Security Service under a cooperation agreement is in direct violation of Georgian legislation, enables the State Security Service to exceed its mandate and does not comply with international standards, which are considered "good practice".

## 2.2. Analysis of the Information Received from Other Public Agencies

Consultation with stakeholders showed that the so-called ODRs are likely to be appointed as "assistants" or "advisors" to entities considered to be posing a high risk to state security,<sup>39</sup> although it is difficult to assert this due to the scarcity of information provided to us. To address this issue, the DRI has applied to ministries, ministries' under-agencies and LEPLs subordinated to ministries, independent LEPLs, the Office of the Government of the Autonomous Republic of Adjara, its ministries.<sup>40</sup> The DRI requested the following public information: the identity of an advisor and an assistant to the minister, the identity of an advisor and an assistant to the head of the LEPL, the

<sup>37</sup> The 2020 Report of the State Security Service, accessible at <https://personaldata.ge/ka/press/post/7267>

<sup>38</sup> *Copland v. The United Kingdom*, application no. 62617/00, judgment of the European Court of Human Rights of 3 April 2007, para. 42.

<sup>39</sup> IDFI, (2015), An Institution of Advisors at Public Agencies, available at:

<https://docs.google.com/viewerng/viewer?url=https://idfi.ge/public/upload/courts/report-advisors-at-public-institutions.pdf>.

<sup>40</sup> See detailed analysis of the received information at the end of the document

identity of an advisor and an assistant to the head of an under-agency institution; information about their work experience, rights and responsibilities, qualification requirements for a particular position as well as information about salaries, bonuses and salary increments paid to them.

It is noteworthy that the DRI has not yet received information from a number of institutions.<sup>41</sup>

### 2.2.1. Personal Information and Practice of Inconsistent Interpretation of Law

Under the Law of Georgia on Personal Data Protection, personal data means any information connected to an identified or identifiable natural person. “A person shall be identifiable when he/she may be identified directly or indirectly, in particular by an identification number or by any physical, physiological, psychological, economic, cultural or social features specific to this person.”<sup>42</sup> One of the legal grounds for the processing of personal data is the consent of the person.<sup>43</sup> The responses received from ministries, ministries’ under-agencies and LEPLs are contradictory. Administrative bodies interpret the same provision in different ways. For example, the Ministry of Internal Affairs and the Ministry of Finance did not provide us with the requested information (relying on the interest of the protection of personal information) and limited themselves to invoking a general rule.<sup>44</sup> Other agencies, however, sent different responses. For example, the Ministry of Regional Development and Infrastructure, the Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs, and the Ministry of Justice supplied information in full without redacting personal information.<sup>45</sup>

Due to the specifics of the civil service, for the institution to be more transparent and accountable, it is important to ensure that the public has information about the work experience of advisors and assistants. However, this information, along with other data, is retained also by a number of other agencies as personal data.

Another problem identified by the analysis of the received information is that it is largely unknown what exactly the tasks and responsibilities of advisors and assistants are in ministries, ministries’ under-agencies and LEPLs. Despite our request, a copy of contracts concluded with

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<sup>41</sup> We have not received any information from the following agencies: Ministry of Foreign Affairs, Office of the Government of Autonomous Republic of Ajara, National Administration of Tourism, National Centre for Teachers’ Professional Development, Cyber Security Bureau, National Forestry Agency, Shota Rustaveli National Scientific Foundation of Georgia, Regulation Agency for Medical and Pharmaceutical Activities, Social Service Agency and National Health Agency.

<sup>42</sup> The Law of Georgia on Personal Data Protection, Article 2.a).

<sup>43</sup> *Ibid.*, Article 5.a).

<sup>44</sup> Letter no. MIA 8 21 01158258 of the Ministry of Internal Affairs of Georgia, dated 10/05/202. Letter no. 08-02/73116 of the Ministry of Finance, dated 09/06/2021.

<sup>45</sup> Letter no. 01/1404 of the Ministry of Regional Development and Infrastructure; Letter no. 01/7059 of the Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs, dated 18.05.2021; and Letter no. 6061 of the Ministry of Justice.

assistants/advisors was supplied by only a few institutions. It is noteworthy that the employee's rights and responsibilities are worded mainly in general terms in the majority of contracts obtained by us in the form of public information. Therefore, it is difficult to get a clear idea of the specific activities carried out by advisors and assistants.<sup>46</sup>

On the pretext of protection of personal data, 14 institutions did not provide us with information on salaries, bonuses and salary increments paid to advisors/assistants.

The DRI believes that an administrative contract determining rights and responsibilities of an employee (personal data being redacted) and remuneration for a specific position cannot be dealt as personal information as it does not allow for the identification of a particular person. Redaction of this information, especially the information concerning rights and responsibilities as well as remuneration of minister's advisors and deputy ministers' assistants gives rise to suspicions regarding the nature of their job.

### 2.2.2 Stipulation of Qualification Requirements

Under an administrative contract, an advisor and assistant to a state-political official will be hired in the public service. These individuals are usually appointed to the position without competition.<sup>47</sup> Accordingly, the legislation does not oblige the public agencies to set specific qualification requirements.

It is clear from the answers received that the vast majority of public institutions rely on the above provision and do not determine the qualification requirements for the advisor (assistant) of the minister or assistant. For example, none of the ministries has determined qualification requirements for the position of an Advisor to the Minister and an Assistant to the Minister (although the law allows it). In some entities (mainly in the departments of a ministry and LEPLs under a ministry – nine, in

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<sup>46</sup> Information concerning tasks and duties of a particular position was provided by the following agencies: Departments of the Ministry of Environmental Protection and Agriculture of Georgia, Ministry of Justice, Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs, Ministry of Healthcare and Social Security of the Autonomous Republic of Ajara, Ministry of Agriculture of the Autonomous Republic of Ajara, Ministry of Finance and Economy of the Autonomous Republic of Ajara, National Agency of State Property, National Food Agency, Office of Resource Officers, Emergency Situations Coordination and Urgent Assistance Center, Municipal Development Fund, National Communications Commission and Financial Analytical Service.

<sup>47</sup> The Law of Georgia on Civil Service, Article 78.

total)<sup>48</sup> the qualification requirements are, in most cases, worded in general terms and are only formulaic.<sup>49</sup>

### 2.2.3. Official Salary, Monetary Rewards and Salary Increments

Due to the fact that in many cases, the identity of an advisor or an assistant is unknown and information about their work experience, rights and responsibilities is unavailable, special attention is paid to their remuneration, bonuses and increments. The DRI team analysed the received correspondence and noted a positive trend that in 2020-2021, in the institutions from which we requested public information, no bonus or increment was paid to advisors/assistants.

The number of advisors and assistants and, consequently, the funds paid to them from the state budget have also been reduced. For example, in 2018, the advisors to the Minister of Environmental Protection and Agriculture and the assistants to the Deputy Minister were paid both salary increments and bonuses. However, from 2020 to date, no bonuses/increments have been paid.<sup>50</sup>

According to the public information, received by the DRI, the Head of the LEPL Office of Resource Officers of Educational Institution has one assistant, whose annual salary is 16,800 GEL, and three advisors, whose annual salary is 86,400 GEL, in total. As regards the identity of these individuals and information about their work experience, the office refused to disclose this information to us, citing the personal data protection interest.<sup>51</sup>

Only in the Ministry of Agriculture of the Autonomous Republic of Adjara, 43,200 GEL is paid as an annual salary to the minister's advisor.<sup>52</sup> This issue is especially noteworthy considering the fact that no qualification requirements have been determined for this position.

Large funds are paid to advisors to the minister and assistants to the deputy ministers in the Ministry of Environmental Protection and Agriculture. In 2020, the Minister of Environmental Protection and

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<sup>48</sup> Agencies where qualification requirements are set are the following: Departments of the Ministry of Environmental Protection and Agriculture, National Agency of State Property, National Food Agency, Office of Resource

Officers, Maritime Transport Agency, State Hydrography Service, Municipal Development Fund, National Communications Commission and Financial Analytical Service.

<sup>49</sup> The National Food Agency is an exception. This agency sets out exhaustive qualification requirements. Letter no. 09/5776.

<sup>50</sup> Letter no. 9213/01 of the Ministry of Environmental Protection and Agriculture, dated 30/08/2021, Annex no. 1.

<sup>51</sup> Letter no. MES 7 21 0000817382 of the Office of Resource Officers, dated 25/08/2021.

<sup>52</sup> Letter no. 03/796 of the Ministry of Agriculture of the Autonomous Republic of Ajara, dated 25/08/2021.

Agriculture had six advisors, and his deputy<sup>53</sup> had seven assistants. During one year, 327,600 GEL was paid to them.<sup>54</sup>

In 2017, assistants to the Deputy Ministers of Justice were paid monetary rewards and salary increments in the amount of GEL 16,830. These sums were paid in addition to their official salary. According to the communication received from the Ministry of Justice, the salary of an assistant to a Deputy Minister amounts to 1,700 GEL. It should be noted that in the Ministry of Justice, an individual could be employed as an Assistant to a Deputy Minister, without competition and without the obligation to meet any qualification requirements.<sup>55</sup> It should be noted that the ministry did not provide us with the accurate information on the number of deputy ministers' assistants. However, judging by the contracts concluded, in 2017, this position was held by two and presently – by one person.

High salaries of advisors and assistants, monetary rewards and bonuses paid to them attract particular attention, especially when there is no information available about their work experience, identity and, in many cases, their rights and responsibilities. Furthermore, in many cases, no qualification requirements are determined. This raises a number of questions about nepotism (See Annex no. 1). Considering that it is impossible to carry out supervision and control and the abovementioned information is not fully accessible, it is not unlikely that representatives of the State Security Service are appointed to these very positions.

### 3. Classifying Asset Declarations and Challenges of Identifying the So-called ODRs

Public control and transparent governance, in general, are demonstrated by the publicity, accessibility and openness of an official's asset declarations. The amendments that came into force on 1 January 2017 have weakened the mechanisms of democratic oversight.

The amendments made it possible to classify the financial status of those officials who, in the areas of intelligence, state security and law-enforcement, "cooperate or have cooperated confidentially with Georgian authorities carrying out the respective activities."<sup>56</sup>

Consequently, if a person falls within the group of officials who have the obligation to fill out an asset declaration<sup>57</sup> and their declaration is classified, it can be assumed that this person cooperates or has cooperated confidentially with intelligence, state security and law-enforcement agencies. The so-

<sup>53</sup> Presumably for all deputies cumulatively.

<sup>54</sup> Letter no. 9213/01 of the Ministry of Environmental Protection and Agriculture, dated 30/08/2021, Annex no. 2.

<sup>55</sup> Letter no. 16151 of the Ministry of Justice, dated 10.12.2021.

<sup>56</sup> The Law of Georgia on the State Secret, Article 6.d.b).

<sup>57</sup> The Law of Georgia on Conflict of Interest and Corruption in Public Agencies, Article 2.

called ODRs (former or current) – who perform tasks additional to those determined under legislation in a particular institution – can be presumed to be in this group.

### 3.1. Asset Declarations Requested as Public Information and Conformity of Past Work Experience with Positions Held

According to a report aired by one of the TV companies on 12 September 2021,<sup>58</sup> some of the mayoral candidates, nominated by Georgian Dream in the 2021 local self-government elections, held the positions in law-enforcement agencies that, under the law, are the basis for submitting an asset declaration.<sup>59</sup> For example,

- The current Mayor of Tetrtskaro – Giorgi Tsiklauri held the position of the Head of the Tsalka-Tetrtskaro Department of the Counterintelligence Department of the Ministry of Internal Affairs in 2011-2015.
- The current Mayor of Oni Municipality – Sergo Khidesheli was the Head of the Gldani-Nadzaladevi Unit of the Tbilisi Main Division of the State Security Service in 2018-2021, and the Deputy Head of the Tbilisi Main Division of the State Security Service in February-June 2021. In June 2021, he was appointed the First Deputy Mayor, and he was elected the Mayor of Oni Municipality as a result of the self-government elections.<sup>60</sup>
- The current Mayor of Telavi Municipality – Levan Andriashvili held the position of the Head of Strategic Development Service of the Service Agency of the Ministry of Internal Affairs, in 2014-2017 and held the position of the Deputy Head of the Rustavi Central Department of the Ministry of Internal Affairs since 2020.
- The current Mayor of Dmanisi - Koba Muradashvili was the Head of the Guria Police Department and later the Head of the Kakheti Police Department of the Ministry of Internal Affairs (2020-2021).

The monitoring of the Civil Service Bureau's website showed that asset declarations of the abovementioned individuals had not been made public. Due to the importance of the issue, the DRI applied to the Civil Service Bureau<sup>61</sup> and requested asset declarations of these officials.

According to the correspondence received from the bureau,<sup>62</sup> it was confirmed that Koba Muradashvili and Sergo Khidesheli held the above-mentioned positions. However, under Article 19.1 of the Law of Georgia on Conflict of Interest and Corruption in Public Agencies, they are subject to

<sup>58</sup> See <https://www.youtube.com/watch?v=CsCTXbSfbgk>.

<sup>59</sup> The Law of Georgia on Conflict of Interest and Corruption in Public Agencies, Article 2.

<sup>60</sup> City Hall of the Oni Municipality (website), [https://oni.gov.ge/?page\\_id=2929](https://oni.gov.ge/?page_id=2929), 10.11.2021.

<sup>61</sup> DRI's Letters nos. 20212909/230, 20212909/231, 20212909/232 and 20212909/233.

<sup>62</sup> Letters nos. G11610 and G11611 of the Civil Service Bureau.

restrictions under Article 6 of the Law of Georgia on State Secrets. Consequently, asset declarations are classified.

Furthermore, according to the correspondence received from the bureau,<sup>63</sup> the positions of Giorgi Tsiklauri and Levan Andriashvili are not "declaration positions". It is noteworthy that according to the public information available on the website of the Tetrtskaro Municipality, Giorgi Tsiklauri indeed worked as the Head of the Tsalka-Tetrtskaro Service of the Counterintelligence Department of the Ministry of Internal Affairs from June 2011 to 1 August 2015.<sup>64</sup>

Under Article 2 of the Law of Georgia on Conflict of Interest and Corruption in Public Agencies, the notion of an "official" obliged to submit an asset declaration also includes the heads and deputy heads of departments of the Ministry of Internal Affairs of Georgia.<sup>65</sup> Therefore, the reasons adduced by the bureau are ill-founded. As for Levan Andriashvili, information about his work experience is not available on the website of the Telavi Municipality.<sup>66</sup>

Working for law-enforcement agencies is not a ground for restricting passive suffrage under the Georgian law. However, given the fact that the individuals concerned have been nominated as mayoral candidates in the municipalities and hold these positions today, it is essential for voters to have comprehensive information about their work experience and financial status in order to make an informed choice during elections. Therefore, in order to ensure more transparency and to dispel certain misgivings about officials' activities, it is important to make their asset declaration public or to give a reasonable explanation as to why they have been classified.

As mentioned on numerous occasions, the findings of the research carried out by the DRI are based on the information requested from public institutions i.e. the information about work experience of advisors and assistants and/or other employees, as well as analysis of public information available on websites and asset declarations posted on the Civil Service Bureau's website. As a result of the analysis of the said information, it is doubtful that the experience of the below official working in law-enforcement agencies is consistent with the positions they currently hold. According to the declaration published on the website of the Civil Service Bureau, Levan Gamkrelidze, Director of the LEPL Land Transport Agency under the Ministry of Economy and Sustainable Development of Georgia, held the position of the Head of the Division of the Central Criminal Police Department of the Ministry of Finance of Georgia until 2019.<sup>67</sup> The agency stated in the correspondence that information about Levan Gamkrelidze's work experience was published on the agency's website. However, this information cannot be found at the link supplied.<sup>68</sup>

<sup>63</sup> Letters nos. G11613 and G11612 of the Civil Service Bureau.

<sup>64</sup> See [tetrtskaro.gov.ge](http://tetrtskaro.gov.ge) (website), <http://tetrtskaro.gov.ge/meria/meri1>.

<sup>65</sup> Law of Georgia on Conflict of Interest and Corruption in Public Agencies, Article 2.1) and Article 14.1.

<sup>66</sup> See [telavi.gov.ge](http://www.telavi.gov.ge/ge/meri) (website), <http://www.telavi.gov.ge/ge/meri>.

<sup>67</sup> An Official's Asset Declaration no. 119801 <https://declaration.gov.ge/Home/DownloadPdf/119801>.

<sup>68</sup> Letter no. 01/495 of Land Transport Agency (LEPL under the Ministry of Economy and Sustainable Development), dated 08/09/2021; <http://lta.gov.ge/>, data as of 10.11.2021.

## 3.2. Asset Declarations of the Heads of Structural Units of the State Security Service

There are only the asset declarations of the Head of the State Security Service and his deputies published on the website of the Civil Service Bureau. In response to the request of the DRI, requesting asset declarations of the heads and deputy heads of structural units (departments), the Civil Service Bureau responded that the declarations were confidential based on the Law of Georgia on State Secrets. According to the communication received, while the heads and deputy heads of the structural units of the State Security Service are required by law to submit their asset declarations, these documents are classified.<sup>69</sup>

In the light of the above, it is clear that the Civil Service Bureau interprets most extensively the provision regarding the secrecy of declarations. Classifying asset declarations of the heads and deputy heads of the structural units of the State Security Service is a vicious practice and, in the absence of proper oversight mechanisms, makes the State Security Service even more closed.

## Conclusion

The research revealed that issues regarding appointment by the State Security Service of a representative in an agency are confidential to the maximum degree. The research demonstrated that in most cases the State Security Service purposefully retains information about these persons and entities even when the law requires the opposite. The parliamentary oversight of the State Security Service is formal. The control over the service is virtually non-existent. It is impossible to determine what tasks the representatives of the State Security Service, the so-called ODRs carry out; whether they are appointed only in the entities determined by the governmental resolution and solely for the achievement of the statutory purposes (monitoring of the implementation of security regime by these entities).

The DRI states the key findings as follows:

- Legislation in force does not require qualification requirements for the appointment of advisors/assistants to political officials, which increases the risk of nepotism.

<sup>69</sup> Website of the Civil Service Bureau, <https://declaration.gov.ge/>. Letter no. G11875 of the Civil Service Bureau,  
Letter no. G11883 of the Civil Service Bureau.

- The correspondences received from ministries, ministries' under-agencies and LEPLs, are inconsistent and it is clear that those to whom the legal provision applies take the liberty to interpret it differently.
- In some cases, cooperation agreements could be concluded with unauthorised entities.
- While concluding a cooperation agreement is voluntary, during the research, there have been no cases identified where the agreement was terminated at the initiative of either party.
- According to the information at hand, as of today, only the National Probation Agency has not concluded a cooperation agreement with the State Security Service.
- A representative of the State Security Service is contractually authorised to monitor non-confidential official correspondence, which is especially problematic considering illegal and mass surveillance of people by the service and mass dissemination of files of surveillance.
- The State Security Service links the signing of a cooperation agreement with entities to operative and investigative activities, despite the lack of necessary preconditions – the objective, tasks and principles.
- The ambiguity of a legal provision and its extensive interpretation by those to whom it applies complicates the identification of the so-called ODRs appointed in agencies bypassing the legislation.

## Annex no. 1.

### Who Submitted What Information

Agencies	Identity and Work Experience of an Advisor/ Assistant	Stipulated Qualification Requirements	Official Tasks and Duties	Amount of Salary
Ministry of Education and Science	-	-	-	-
Departments of the Ministry of Education and Science	-	-	-	-
Ministry of Defence	-	-	-	-
Ministry of Environmental Protection and Agriculture of Georgia	-	-	-	+

Departments of the Ministry of Environmental Protection and Agriculture of Georgia	-	+	+	+
Ministry of Economy and Sustainable Development	-	-	-	-
Departments of the Ministry of Economy and Sustainable Development	No Advisor/ Assistant	-	-	-
Departments of the Ministry of Foreign Affairs	No Advisor/ Assistant	-	-	-
Ministry of Finance	-	-	-	-
Ministry of Justice	+	-	+	+
Departments of the Ministry of Justice	No Advisor/ Assistant	-	-	-
Public Service Development Agency	+	+	+	+
Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs	+	-	+	+
Ministry of Regional Development and Infrastructure	+	-	+	+
Roads Department under the Ministry of Regional Development and Infrastructure	+	-	-	+
Ministry of Internal Affairs	-	-	-	-
Ministry of Healthcare and Social Security of the Autonomous Republic of Ajara	+	-	+	+
Ministry of Agriculture of the Autonomous Republic of Ajara	+	-	+	+
Ministry of Finance and Economy of the Autonomous Republic of Ajara	+	-	+	+
National Agency of State Property	-	+	+	+
National Food Agency	+	+	+	+
Land Transport Agency	-	-	-	-
Office of Resource Officers	+	+	+	+
Maritime Transport Agency	-	+	-	-
State Hydrography Service	+	+	-	+
International Centre of Education	No Advisor/ Assistant	-	-	-

National Centre for Disease Control and Public Health	+	-	+	-
Central Election Commission	-	-	-	-
Emergency Situations Coordination and Urgent Assistance Centre	-	-	+	+
Municipal Development Fund	+	+	+	+
National Communications Commission	+	+	+	-
Financial Analytical Service	+	+	+	+

## Annex no. 2.

DRI has not received information from the following agencies

Ministry of Foreign Affairs
Office of the Government of Autonomous Republic of Ajara
National Administration of Tourism
National Centre for Teachers' Professional Development
Cyber Security Bureau
National Forestry Agency
Shota Rustaveli National Scientific Foundation of Georgia
Regulation Agency for Medical and Pharmaceutical Activities
Social Service Agency
National Health Agency

### Annex no. 3

#### List of entities that have the cooperation agreements with the State Security Service<sup>70</sup>

Entities	Date of Cooperation Agreement
Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs of Georgia	12.11.2019
Ministry of Environmental Protection and Agriculture of Georgia	19.02.2018
Ministry of Regional Development and Infrastructure of Georgia	18.03.2016
Ministry of Finance of Georgia	11.03.2016
Office of the Government of Autonomous Republic of Ajara	7.07.2016
Batumi City Hall	01.03.2016
State Military Scientific-Technical Center Delta	18.03.2016
Ltd Batumi Sea Port (Batumi Port)	05.04.2016
Ltd Poti Sea Port (Poti Port)	21.08.2016
Ltd SAKAERONAVIGATSIA	18.03.2016
JSC United Energy System SAKRUSENERGO	15.04.2016

<sup>70</sup> The cooperation agreement was not concluded with the National Probation Agency. According to the provided information, agreement was not also concluded with the Tbilisi Shota Rustaveli International Airport and the Alexander Kartvelishvili Batumi International Airport. However, according to the information at DRI's disposal, cooperation agreement on behalf of these subjects is/was signed with the United Airports of Georgia.

## Annex no. 4

### List of entities that do not submit the information on the cooperation agreement to DRI

State Security Service of Georgia
Ministry of Foreign Affairs of Georgia
Ministry of Economy and Sustainable Development of Georgia
Public Service Development Agency
Tbilisi City Hall
Special Penitentiary Service
Ltd Engurhesi
JSC Telasi
JSC Georgian Railway
Ltd United Airports of Georgia