

**DIGITAL THREATS TO FREEDOM OF
EXPRESSION IN GEORGIA: SURVEILLANCE,
HARASSMENT, AND PROTECTION GAPS**



HUMAN RIGHTS CENTER



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I. The Rise of Digital Repression

In recent years, Georgia's digital landscape has undergone a dramatic transformation. While technological advancements have expanded access to information and civic engagement, they have also enabled new forms of repression. Surveillance technologies, smear campaigns, and punitive legal measures are increasingly used to silence dissent, intimidate activists, and control public discourse. The online space, once a platform for free expression and mobilization, has become a battleground where human rights defenders/ activists face growing risks.

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The deployment of facial recognition cameras, the expansion of covert surveillance powers, and the criminalization of political expression on social media reflect a broader strategy of control. These practices have created a chilling effect, discouraging civic participation and undermining democratic values.

Georgia's national laws regulating online activity, surveillance, and freedom of expression have expanded significantly in recent years. Amendments to the Criminal Procedure Code and the Administrative Offenses Code have increased the scope of covert investigations and introduced penalties for vaguely defined offenses such as "insulting public officials." These laws lack clear safeguards and are often enforced selectively, raising serious concerns about legality and proportionality.

International bodies, including the UN Human Rights Committee and the Venice Commission, have criticized Georgia's surveillance practices and legal amendments for failing to meet international standards. The European Court of Human Rights (ECtHR) has also issued rulings in comparable cases, emphasizing the need for legal clarity, proportionality, and independent oversight.

Despite these warnings, enforcement remains weak, and accountability mechanisms are either absent or ineffective. The result is a legal environment where repression is enabled by design, and human rights defenders are left vulnerable to both state and non-state actors.



II. Technological Surveillance

- Facial recognition as a tool for repression

In early 2025, Georgia significantly expanded its surveillance infrastructure by installing Chinese-made Dahua facial recognition cameras along Rustaveli Avenue and near Parliament. Procurement records show that in January and February alone, the Emergency Management

Service (112) purchased 135 cameras for a total of approximately 485,877 GEL (~€170,000) - almost double the amount spent on similar equipment between 2019 and 2024. These cameras, capable of biometric identification and real-time tracking, raise serious concerns about privacy, legality, and national security. The Personal Data Protection Service has launched an inquiry into whether their deployment on Rustaveli complies with Georgian law. Civic IDEA warns that Dahua is listed by U.S. authorities as a national security risk due to ties with authoritarian surveillance practices, making Georgia's reliance on this technology a potential threat to civil liberties and democratic norms.¹

The Ministry of Internal Affairs continues to use facial recognition cameras extensively against protest participants during administrative offense proceedings, particularly in cases related to road blockages. In most instances, the only evidence presented in court consists of photos extracted from these cameras, often without context, which judges accept as sufficient proof of guilt. Courts rarely assess whether identification was lawful or whether officials had proper access to protected databases under personal data protection laws. This practice serves as a tool to intimidate citizens and control future protest behavior, creating a chilling effect on freedom of expression. In one case from January 2025, video evidence submitted to Tbilisi City Court revealed targeted live surveillance of a protester on Rustaveli Avenue, including manual camera tracking and zooming to read documents in the individual's hands - actions unrelated to the alleged offense. Such monitoring suggests real-time operator control and raises serious concerns about the collection of personal information without legal grounds.²

In *Glukhin v. Russia* (no. 11519/20), the European Court of Human Rights examined the use of facial recognition technology during a peaceful protest in Moscow. The applicant, a political activist, was identified and prosecuted based on images captured by facial recognition cameras installed in public spaces. The Court found that this practice constituted an interference with both **Article 8 (right to respect for private life)** and **Article 10 (freedom of expression)** of the European Convention on Human Rights. It emphasized that mass or targeted surveillance of individuals exercising their right to protest undermines democratic principles and creates a chilling effect on free expression. The Court concluded that such measures were **not necessary in a democratic society**, as they lacked adequate legal safeguards and proportionality.³

- Communication interception and data collection by the State Security Service

The current system of covert investigative activities in Georgia is marked by **limited independence, ineffective oversight, and high potential for abuse**, threatening the

¹ Civic IDEA. (2025, March 14). Georgian Dream's Surveillance of Protesters through Chinese Cameras [Georgian Dream's Surveillance of Protesters through Chinese Cameras]. See [Link](#)

² GYLA; (2025, March 12). [The Ministry of Internal Affairs uses facial recognition technologies for total control against peaceful demonstrators]. See [Link](#)

³ European Court of Human Rights. (2024, June 4). *Glukhin v. Russia* (Application no. 11519/20)

inviolability of personal life and the rights of activists and ordinary citizens. In its 2022 observations, the UN Human Rights Committee stated that Operative-Technical Agency lacks sufficient independence from the State Security Service, the supervision mechanism over the activities of the Agency is ineffective. The Committee noted that the existing oversight mechanism over the Agency's activities is not effective. It is particularly concerned by the fact that Operative Technical Agency, which conducts electronic surveillance, is granted both regulatory and monitoring powers.⁴

In 2022, the Criminal Procedure Code of Georgia was amended to expand the scope of covert investigative activities. These changes increased the number of offenses for which such measures could be used, extended the duration of surveillance operations, and altered the timeframe for notifying individuals subjected to secret surveillance. On August 26, 2022, the Venice Commission issued an urgent opinion on the amendments, expressing concern that the inclusion of offenses such as "violation of human equality" (Article 142) and "racial discrimination" (Article 1421) lacked clear justification and supporting analysis. The Commission emphasized that timely notification to individuals subject to surveillance and the establishment of an independent oversight body with adequate review powers are essential for protecting rights.⁵ However, no independent oversight body was created after the veto was overridden, and the amendments entered into force.

The UN Human Rights Committee expressed regret over the legislative changes, noting that extending the scope and duration of covert investigative actions significantly increases the risk of violating the right to privacy, especially in the absence of effective safeguards to protect personal data, prevent unlawful surveillance, and ensure accountability.⁶

The most significant evidence of uncontrolled surveillance emerged in 2021, when an unprecedented number of files documenting the monitoring and wiretapping of citizens, including members of civil society, journalists, politicians, clergy, and diplomats, were leaked. The Public Defender noted the dissemination of this information during the 2021 pre-election period raised reasonable concerns that illegally obtained personal data may have been used to exert unlawful influence ahead of the elections.⁷ In the criminal case on illegal eavesdropping/surveillance, the files were uploaded in public platforms, allegedly by the former employee of the State Security Service, who also left a message on the webpage: "There is no other cruel and awful job than where I worked several years! The name does not sound that horrible - just the opposite, it sounds very generous – State Security Service... in fact, nothing undermines the security of our state more than this service does! We are a

⁴ United Nations, Human Rights Committee, Concluding observations on the fifth periodic report of Georgia, CCPR/C/GEO/CO/5 (13 September 2022) para. 39. see [link](#)

⁵ European Commission for Democracy Through Law (Venice Commission) – Urgent Opinion on the Draft Law on the Amendments to the Criminal Procedure Code Adopted by the Parliament of Georgia on June 7 2022, CDL-PI(2022)028, Opinion no. 1092/2022 (2022) para. 45. & 53; see. [link](#)

⁶ United Nations, Human Rights Committee, Concluding observations on the fifth periodic report of Georgia, CCPR/C/GEO/CO/5 (13 September 2022) para. 39. See. [link](#)

⁷ Public Defender Presents Annual Report in Parliament, 2022, see: [link](#)

cancer and I am one of the metastases! Here you will see the scopes of the disgusting work I did for years and God forgive me. I pray one day you wake up and destroy this system!”⁸

In addition to violating the right to privacy, the leaked materials exposed infringements of other fundamental rights. For instance, they revealed the monitoring of religious organizations’ activities. The use of illegal surveillance to collect or disseminate discrediting information about clergymen constitutes both an intrusion into personal life and a clear violation of the freedom of religion.⁹

The leaked materials revealed that the surveillance had been initiated without any court authorization.¹⁰ Given the unprecedented volume of files and their verification by multiple sources, the materials are believed to have been obtained through illegal covert surveillance by state authorities. Unfortunately, this type of uncontrolled monitoring is enabled by existing legislation, which allows security agencies direct access to mobile operators’ servers without independent oversight. This legal framework facilitates the possibility of unlawful surveillance while minimizing the likelihood of detection.¹¹

III. Disinformation and Punitive Legal Measures

- Smear Campaigns and doxing

In 2023 the enactment of “foreign influence” legislation has profoundly eroded fundamental freedoms by delegitimizing and stigmatizing both civil society organizations and independent media. Since then CSOs and individuals critical of the government were stigmatized with labels such as “enemies of the church” and “LGBT propagandists,” accompanied by intimidation and harassment. After May 7, 2024, repression intensified: citizens opposing the repressive law, along with their family members, received persistent threatening and abusive calls from anonymous numbers. Soon, the attacks moved into the public space, with hate graffiti and targeted vandalism against of CSOs, political opponents as well as the homes of activists. For instance, posters appeared on the walls of Human Rights House Tbilisi were depicting CSO directors with hostile inscriptions like “Destroyers of the country”, followed by offensive graffiti scrawled across its facade, fence, gate, and even the asphalt in front of the building. This incitement was allegedly led by a member of the Georgian Parliament from the “Georgian Dream” party. Thus, such campaigns culminated in physical assaults: between May 5–11, 2024, for instance attacks on a National Teacher’s Award laureate, the executive director of the Institute for the Development of Freedom of Information, a TV crew, and activists

⁸ Tabula, Mtavari Arkhi: Person, who leaked the secret files from the State Security Service, Committed Suicide, 13.09.2021; see [link](#)

⁹ Report of the Public Defender of Georgia on the State of Human Rights and Basic Freedoms of Georgia in 2021, p 161; see [link](#)

¹⁰ Radio Liberty, “Switch-it on quickly” how the State Security Service makes decision whom they should listen to,” 25.09.2021; see. [link](#)

¹¹ Statement of the Public Defender of Georgia on International Human Rights Day, 10.12.2021. See. [link](#)

opposing the “Russian law”. Further incidents included the severe beating of the biker march organizer, etc.¹²

In 2025, Georgian pro-government media outlets most notably Imedi TV engaged in persistent smear campaigns against civil society and activists by portraying them as “foreign agents” or instruments of Western influence. Imedi TV aired segments falsely claiming that NGOs such as the Georgian Young Lawyers’ Association (GYLA), Social Justice Center, Sapari, Human Rights Center, and others received suspiciously large grants from the EU accusing them of secretly financing protests and organizing violence. These reports echoed official rhetoric from Georgian Dream officials and were designed to discredit independent monitoring of police brutality and torture, as well as efforts to support protest detainees.¹³

In addition, intimidation tactics against activists in Georgia extended beyond physical repression to coordinated online harassment. On September 9, Imedi TV, widely regarded as a pro-government broadcaster, amplified smear narratives against activists, including publishing content that exposed personal details, which raised serious concerns about privacy violations and intimidation.¹⁴ Published piece was titled *‘Opposition’s Violent Group Exposed’*, framing activists as aggressors and fueling smear campaigns that later spread across social media.¹⁵

Allegedly government-aligned troll networks launched smear campaigns portraying protesters as enemies, amplifying hate speech and disinformation across social media. Cyberbullying escalated into doxing: the deliberate dissemination of activists’ personal information, including home addresses, to incite offline attacks. A striking example occurred in mid-September, when troll accounts circulated posts titled “Opposition Orcs Who Attacked Georgian Dream’s Office”, publishing the addresses of at least 19 protest participants. The content spread rapidly through Facebook and Telegram before being removed following mass reporting. This practice not only endangered activists’ safety but also created a chilling effect, reinforcing fear that participation in peaceful protests could lead to targeted harassment both online and offline.

The deliberate disclosure of private information such as home addresses or phone numbers without consent constitutes a serious violation of privacy and security. Under international human rights standards, including the European Convention on Human Rights (ECHR), such practices interfere with Article 8 (right to respect for private and family life) and can also undermine Article 10 (freedom of expression) by creating a chilling effect on participation in public debate or protest. The European Court of Human Rights has repeatedly held that states must ensure adequate safeguards against unlawful data disclosure and harassment. Doxing

¹²HRC, Annual Report, 2024, P 7-8; <https://www.hrc.ge/files/380annual2024eng.pdf>

¹³ Myth Detector. (2025, July 11). [TV Imedi Spreads Disinformation About Grants Received by NGOs.] See [Link](#)

¹⁴ Exclusive News. (2025, September 9). ქრონიკამ ოპოზიციის მოძალადე დაჯგუფება გაშვიფრა [“Kronika Exposed the Opposition’s Violent Group”]. See [Link](#)

¹⁵ See [Link](#)

especially when aimed at activists exposes individuals to threats, intimidation, and physical harm, and is incompatible with the rule of law in a democratic society.

- Weaponizing Law Against Online Speech

The law used to penalize activists, journalists, politicians, and citizens was adopted by the ruling Georgian Dream party in February 2025, amending the Administrative Offenses Code with Article 173¹⁶, which criminalizes verbal insults, offensive remarks, or other degrading actions toward state or public officials related to their official duties. Penalties range from fines of 1,500 GEL (~520 EUR) to 4,000 GEL (~1,390 EUR) or up to 45 days of administrative detention, increasing to 2,500–6,000 GEL (~870–2,080 EUR) and up to 60 days for repeat offenses.

The enforcement of this amendment against protest participants began in late May 2025, when, following a complaint by Georgian Dream member Irakli Zarkua, the Zugdidi City Court fined activists Mariam Sichinava 3,500 GEL (€1,200) and Keren Esebua 4,000 GEL (€1,370). Later changes to the Code of Administrative Offenses extended penalties to verbal insults against law enforcement officers, introducing fines of 2,000–5,000 GEL (€685–€1,715) or administrative detention for up to 60 days. Under this provision, activist Tornike Skhvitaridze received a 5-day detention, while Ani Kavtaradze was fined 5,000 GEL (€1,715). Miranda Bagaturia and Ana Kurashvili were each fined 4,000 GEL (€1,370) for shouting “servant” and “false witness” at police officers. Activist Albi Kordzaia was sentenced to 5 days in detention after a verbal dispute with a police officer, having previously served a 10-day sentence for allegedly insulting Georgian Dream member Tea Tsulukiani. Activist Beka Papashvili received a 7-day detention. On May 30, based on a complaint by Georgian Dream member Mariam Lashkhi, the Tbilisi City Court sentenced activists Tatia Apriamashvili and Lika Lortkipanidze to 12 days of detention each, while Magda Mamukashvili was fined 4,000 GEL (€1,370). Her assets were later frozen for failing to pay the fine. The same enforcement mechanism freezing bank accounts - was applied to activists Mariam Sichinava, Nika Narsia, and Nadim Khmaladze, as well as journalist Gela Mtivlishvili.¹⁶

The law has become a powerful tool for restricting freedom of expression and punishing online activity. Dozens of people, including politicians, activists, and journalists, have already been fined for Facebook posts under this law. Punishments have included heavy fines and even short-term imprisonment. Below are specific cases illustrating how this law has been applied.

- On June 12, 2025, Tbilisi City Court Judge Manuchar Tsatsua fined TV host Eka Mshvelidze 4,000 GEL. The Ministry of Internal Affairs initiated administrative

¹⁶ Media Institute; PERSECUTION OF PROTEST PARTICIPANTS (Legislative Changes and Existing Practices) 2025; P 8; See [Link](#)

proceedings against her over a Facebook post referring to Georgian Dream MP Mariam Lashkhi. The post stated: “They wrote at the slave’s house who and what she is.”¹⁷

- On June 12, 2025, Tbilisi City Court Judge Manuchar Tsatsua fined TV host Misha Mshvildadze 4,000 GEL for a Facebook post published in February about Parliament Speaker Shalva Papuashvili. The Ministry of Internal Affairs argued that the post contained offensive language aimed at insulting Papuashvili. Mshvildadze did not attend the hearing; his lawyer cited scheduling conflicts. The decision was issued under Article 173¹⁶ of the Administrative Offenses Code.¹⁸
- Human rights organization “Sapari” leader Baia Pataraiia faced administrative proceedings initiated by the Ministry of Internal Affairs over Facebook posts alleged to insult Georgian Dream representatives Mariam Lashkhi, Tea Tsulukiani, and Mamuka Mdinardze. The case is based on posts published on her Facebook page.¹⁹
- Civil activist Ana Subeliani was fined 4,000 GEL by Tbilisi City Court Judge Nino Enukidze for a Facebook post about Georgian Dream MP Nino Tsilosani. The post, published on February 11, stated: “This scoundrel is not a woman!” The Ministry of Internal Affairs initiated the administrative case under Article 173¹⁶ of the Administrative Offenses Code. The first hearing, scheduled for June 12, was postponed at the request of her lawyer.²⁰
- On June 20, 2025, journalist and TV anchor Vaho Sanaia from Formula was fined 4,000 GEL by Tbilisi City Court Judge Koba Chagunava for a Facebook post. The Ministry of Internal Affairs initiated the case, reportedly because Sanaia referred to Georgian Dream leader Tea Tsulukiani as a “slave” in his post. Sanaia responded publicly, stating he would never voluntarily pay the fine.²¹
- Vika Bukia was fined for a Facebook status about Georgian Dream MP Mariam Lashkhi. The decision was announced by Tbilisi City Court Judge Davit Tetrauli. On May 30, Bukia shared a video with the caption: “A slave passed by,” showing Lashkhi in the footage.²²
- Politician Elene Khoshtaria, founder of the party *Droa* and a leader of the *Coalition for Change*, was fined 4,000 GEL by Tbilisi City Court Judge Davit Tetraul for a Facebook

¹⁷ Radio Tavisupleba. (2025, June 12). *ეკა მშველიაძე საკუთარ სასამართლო პროცესზე - 12 ივნისი, 2025 წელი* [Eka Mshvelidze fined 4,000 GEL over Facebook post about MP Mariam Lashkhi]. See [Link](#)

¹⁸ Radio Tavisupleba. (2025, June 12). *მიშა მშვილდაძე 4000 ლარით დააჯარიმეს შალვა პაპუაშვილის შესახებ თებერვალში გამოქვეყნებული ფეისბუქ-პოსტის გამო* [Misha Mshvildadze fined 4,000 GEL over February Facebook post about Shalva Papuashvili]. See [Link](#)

¹⁹ Radio Tavisupleba. (2025, June 12). *უფლებადამცველი ორგანიზაცია "საფარის" ხელმძღვანელი, ბაია პატარაია, მის წინააღმდეგ დაწყებულ ადმინისტრაციულ სამართალდარღვევაზე* [Human rights organization “Sapari” leader Baia Pataraiia faces administrative proceedings over Facebook posts]. See [Link](#)

²⁰ Radio Tavisupleba. (2025, June 12). *სამოქალაქო აქტივისტი ანა სუბელიანი „ქართული ოცნების“ დეპუტატის, ნინო წილოსანის შესახებ დაწერილი ფეისბუქ-პოსტის გამო 4000 ლარით დააჯარიმეს* [Civil activist Ana Subeliani fined 4,000 GEL over Facebook post about Georgian Dream MP Nino Tsilosani]. See [Link](#)

²¹ Radio Tavisupleba. (2025, June 20). *4000 ლარით დააჯარიმეს ვახო სანაია Facebook-პოსტის გამო* [Journalist Vaho Sanaia fined 4,000 GEL over Facebook post]. See [Link](#)

²² Radio Tavisupleba. (2025, June 12). *დააჯარიმეს „ქართული ოცნების“ დეპუტატის, მარიამ ლაშხის შესახებ Facebook-ზე გამოქვეყნებული სტატუსის გამო* [Vika Bukia fined over Facebook status about Georgian Dream MP Mariam Lashkhi]. See [Link](#)

post about Georgian Dream leader Mamuka Mdinardze. In addition to the fine, the court revoked her right to carry firearms for three years.²³

- Journalist Dea Mamiseishvili, who works for “Mtavari Arkhi,” was fined 3,000 GEL by judge Lela Mildenberg for a Facebook post about Georgian Dream’s executive secretary Mamuka Mdinardze. Neither Mamiseishvili nor her attorney attended the hearing, though she was present near the courthouse in solidarity with detainees. In her post, she used strong language referring to Mdinardze as a “bastard,” “scoundrel,” and “inhuman” - and defended her comments as freedom of expression.²⁴
- Civil activist Mariam Geguchadze was fined 3,000 GEL, while Giga Makarashvili was fined 4,000 GEL. The decisions were announced by Tbilisi City Court on June 12, 2025, in cases related to Facebook posts alleged to insult Georgian Dream politicians.²⁵
- On June 24, 2025, Tbilisi City Court Judge Lela Tsagareishvili fined citizen Diana Gogoladze 2,500 GEL for a Facebook comment. The comment, posted under a photo of Ministry of Internal Affairs lawyer Tamta Khimbarishvili, read: “Young girl and such a bitch.” The Ministry argued this constituted an insult to a public official under Article 173¹⁶ of the Administrative Offenses Code.²⁶
- On June 12, 2025, Zugdidi City Court Judge Irakli Apshilava sentenced activist Rostom (Rosto) Zarandia to five days of administrative detention for verbally insulting a Zugdidi City Hall employee. The case concerned a Facebook post made after an April 9 protest, in which Zarandia referred to press center staff member Magdalen Todua as “tvinge” and “focho” (in Mingrelian: “brainless” and “foolish”). Todua reported the incident to the prosecutor’s office. Zarandia argued in court that the remarks were within freedom of expression and noted his long-standing acquaintance with Todua, but the court rejected motions to question her or provide a Mingrelian interpreter.²⁷

These cases illustrate how the law has evolved into a tool for political control, raising serious concerns about democratic backsliding and human rights violations. The introduction and enforcement of Article 173¹⁶ have significantly curtailed freedom of expression in Georgia. This legal framework not only restricts political criticism but also undermines democratic principles, signaling a shift toward authoritarian control over digital space


²³ Radio Tavisupleba. (2025, June 12). პოლიტიკოსი, პარტია „დროას“ დამფუძნებელი და „კოალიცია ცვლილებებისთვის“ ერთ-ერთი ლიდერი ელენე ხოშტარია სასამართლომ 4000 ლარით დააჯარიმა ფეისბუქპოსტის გამო [Politician Elene Khoshtaria fined 4,000 GEL over Facebook post about Mamuka Mdinardze]. See [Link](#)

²⁴ Radio Tavisupleba. (2025, June 12). ჟურნალისტი დეა მამისეიშვილი 3000 ლარით დააჯარიმეს მდინარაძეზე ფეისბუქ-პოსტის გამო [Journalist Dea Mamiseishvili fined 3,000 GEL over Facebook post about Mdinardze]. See [Link](#)

²⁵ TV Pirveli. (2025, June 12). მარიამ გეგუჩაძე და დეა მამისეიშვილი 3 000 ლარით დააჯარიმეს - გიგა მაკარაშვილს 4 000-ლარიანი ჯარიმის გადახდა დაეკისრა [Mariam Geguchadze fined 3,000 GEL; Giga Makarashvili fined 4,000 GEL]. See [Link](#)

²⁶ Radio Tavisupleba. (2025, June 24). ფეისბუქზე კომენტარის გამო მოქალაქე 2500 ლარით დააჯარიმეს [Citizen fined 2,500 GEL for Facebook comment]. See [Link](#)

²⁷ Radio Tavisupleba. (2025, October 30). ზუგდიდში ფეისბუქპოსტისთვის აქტივისტს 5-დღიანი პატიმრობა მიუსაჯეს [An activist sentenced to 5 days in custody over Facebook post in Zugdidi]. See [Link](#)



IV. Institutionalized Injustice - Gaps in accountability and legal protection

The Georgian legal framework reveals a stark double standard in addressing digital harassment and online abuse. When comments or posts target government officials, even if mildly critical, they are swiftly penalized under newly adopted laws - often resulting in fines or detention. In contrast, when activists are subjected to coordinated smear campaigns, doxing, or threats including the illegal publication of their home addresses authorities routinely fail to respond. Troll networks and pro-government media outlets operate with impunity, spreading defamatory content and personal data without consequence. Complaints filed by civil society organizations or victims of these attacks are frequently ignored, dismissed without substantive review, or delayed indefinitely. This selective enforcement not only undermines the rule of law but also reinforces a climate of fear and impunity, where state-aligned actors are shielded from accountability while dissenting voices are punished.

While domestic remedies have proven ineffective, international human rights bodies have increasingly recognized the dangers posed by unchecked digital repression. The European Court of Human Rights (ECtHR) has issued several rulings against states for failing to protect citizens' online rights or for punishing them unlawfully.

For example, a similar pattern of disproportionate punishment for online political speech has been condemned by the European Court of Human Rights in recent cases against Turkey. In 2023, the ECtHR examined multiple instances where Turkish citizens were fined or criminally prosecuted for social media posts criticizing government officials or expressing support for opposition figures. The Court found that these penalties violated Article 10 of the European Convention on Human Rights, emphasizing that such measures were not necessary in a democratic society and had a chilling effect on free expression. The ECtHR awarded damages to the applicants and reaffirmed that states must not use vague or overly broad laws to suppress dissent online. This ruling is directly relevant to Georgia's current practice of punishing activists, journalists, and citizens for Facebook posts, and highlights the urgent need for legal safeguards that protect digital expression rather than criminalize it.²⁸

²⁸ *Doğudan v. Turkey*, no. 12256/21, judgment of 26 September 2023, ECtHR.; *Parlas and Others v. Turkey*, no. (see ECtHR docket), judgment of 3 October 2023, ECtHR (58 applications).