

CAMPAIGN FINANCE MONITORING

From Monitoring to Reform



Monitor's Manual

FOREWORD

The Lebanese Transparency Association (LTA) is releasing this Monitor's Manual as part of its Campaign Finance Monitoring project, in the framework of its Democratization and Public Accountability Program. This initiative is a premiere in Lebanon and the Arab region.

Based on international best practices, LTA has customized its methodology to suit Lebanon's unique political context. This manual designed in a user-friendly fashion will guide monitors in their activities.

LTA would like to recognize the invaluable contributions of the International Foundation for Electoral Systems (IFES) and especially Dr. Marcin Walecki, as well as the Lebanese Association for Democratic Elections (LADE) and especially Nabil Hassan. LTA would also like to thank, the United Kingdom Embassy in Beirut for their financial support, which made the publication of the monitor's manual possible.

Special thanks go to Dr. Khalil Gebara, LTA's former Co-Executive Director who initiated this project. Finally, LTA would like to thank its Programs Director, Gaelle Kibranian, who has supervised the publication of the manual, and the team members of the Campaign Finance Monitoring project, who have developed the content of this manual, especially Lynne Ghossein, May Nouredine, Rabeh Ghadban, Natacha Sarkis, Said Issa, and Danny Haddad.

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I. INTRODUCTION

Political finance regulations enable fair and democratic competition. The efficacy of campaign finance law depends in part on the caliber of independent observation and on the monitoring mechanism.

Citizens trust democratic governments that are accountable to the political body. They trust politicians who promote their interests. In many countries, however, elected leaders often fail to comply with the laws that they have themselves designed.

Political corruption may be defined as the use or misuse of governmental powers by government officials for illegitimate private gain. Political corruption entails the exploitation of procedures, regulation, policies and institutions to sustain the powers, wealth, and positions of those in office. All forms of government, democratic or otherwise, are susceptible to political corruption and the decision making process is directly affected by this phenomenon.

Forms of corruption vary but include bribery, extortion, cronyism, nepotism, clientelism, patronage, and embezzlement. In some countries, corruption is so common that it is even intrinsic of businesses or as part of the interaction of citizens with government officials.

Money and politics in a democratic system can generate an environment that, if left unregulated, can negatively affect the results of the electoral process. The four major risks of unregulated campaign finances are as follows:

- **Uneven Playing Field**
Large sums of money in politics give some candidates undue advantage over others, which constrains competition.
- **Unequal Access to Office**
Citizens from low-income communities are unable to run for office or to achieve meaningful representation.
- **Co-Opted Politicians**
Those who donate funds will control the politicians they support.
- **Dirty Money**
Dirty or illicitly earned money will corrupt the system and undermine the rule of law ¹.

The Lebanese Transparency Association (LTA) seeks to monitor the 2009 Parliamentary Elections in order to ensure that the electoral process is administered in accordance with democratic principles that lead to good governance. We believe that successful elections require a monitoring process that is independent and objective – a mechanism that is capable of enforcing electoral laws and regulations.

¹ USAID, "Money and Politics Handbook: A Guide to Increasing Transparency in Emerging Democracies," Office of Democracy and Governance, November 2003

The goal of LTA's Campaign Finance Monitoring project is to promote transparency in elections. The question of transparency carries exceptional weight in the 2009 elections for a number of reasons. First, the unprecedented significance and political ramifications of the 2009 elections' results make the process vulnerable to illegitimate campaign spending that matches the fierceness of the competition. Second, the 2008 Parliamentary Election Law has introduced long-awaited reforms, especially campaign finance and media regulations as well as the establishment of a Supervisory Commission on Electoral Campaign (SCEC).

Civil society groups have a responsibility to maintain the implementation of these reforms in order to prove both their value and their need. Through this pilot Campaign Finance Monitoring project, LTA will provide recommendations and publish a final report. These documents will later be used as strong advocacy tools to establish and implement future electoral and anti-corruption reforms. They will also serve as a hands-on example that demonstrates the positive effects of campaign finance regulations.

As such, this project does not end with the 2009 elections; rather, LTA will continue to focus its efforts on raising awareness about voter rights and on sustaining advocacy to implement reforms.

LTA is coordinating its project with other civil society organizations, most notably the Lebanese Association for Democratic Elections (LADE). LADE will be leading a national coalition of civil society organizations, the Coalition Libanaise pour l'Observation des Elections (CLOE) to monitor other aspects of the electoral process.

This coordination aims at developing further the success story based on the achievements of Lebanese Civil Society Organizations (CSOs) in the field of elections. The process began when civil society representatives participated in the National Commission for an Electoral Law. After the suggestion of drafting the Boutros Law, the Civil Campaign for Electoral Reform (CCER) was established. Through this campaign, over fifty CSOs engaged in advocacy and outreach efforts which reconfigured governance standards.

We should continue to build on this process by implementing a professional and influential monitoring campaign that supersedes our previous efforts to assert the positive role of CSOs.

Finally, the 2008 Electoral Law has established the SCEC, and it is crucial that the monitoring process complements the work of this Commission and supports its establishment and transition to an independent electoral Commission with full jurisdiction.

Fighting political corruption begins with free, fair and transparent elections.

II. THE NEW ELECTORAL DISTRICTS

DISTRICTS & SEPARATIONS OF SEATS

Beirut

District	Number of seats	Sunni	Shiite	Druze	Maronite	Roman Catholic	Roman Orthodox	Evangelical	Armenian Orthodox	Armenian Catholic	Minorities
Beirut I: Ashrafieh, Ramlieh, Siefi	5	-	-	-	1	1	1	-	1	-	-
Beirut II: Al-Bashoura, Al-Mdawar, Al-marfaa	4	1	1	-	-	-	-	-	2	1	-
Beirut III: Ras Beirut, Mina al-Husen, Dar el-Marisa, al-Mazraa, al-Saytbe, Zakak al-Blat	10	5	1	1	-	-	1	1	-	1	1
TOTAL	19	6	2	1	1	1	2	1	3	1	1

Mount Lebanon

District	Number of seats	Sunni	Shiite	Druze	Ma-ronite	Roman Catholic	Roman Orthodox	Evangelical	Armenian Orthodox	Armenian Catholic	Minorities
Baabda	6	-	2	1	3	-	-	-	-	-	-
Metn	8	-	-	-	4	1	2	-	1	-	-
Chouf	8	2	-	2	3	1	-	-	-	-	-
Aley	5	-	-	2	2	-	1	-	-	-	-
Keserwan	5	-	-	-	5	-	-	-	-	-	-
Jbeil	3	-	1	-	2	-	-	-	-	-	-
TOTAL	35	2	3	5	19	2	3	-	1	-	-

South Lebanon

District	Number of seats	Sunni	Shiite	Druze	Ma-ronite	Roman Catholic	Roman Orthodox	Evangelical	Armenian Orthodox	Armenian Catholic	Minorities
Saida	2	2	-	-	-	-	-	-	-	-	-
Saida's Neighboring Villages	3	-	2	-	-	1	-	-	-	-	-
Nabatiye	3	-	3	-	-	-	-	-	-	-	-
Tyr	4	-	4	-	-	-	-	-	-	-	-
Bint Jbeil	3	-	3	-	-	-	-	-	-	-	-
Marjeyoun & Hasbaya	5	1	2	1	-	-	1	-	-	-	-
Jezzine	3	-	-	-	2	1	-	-	-	-	-
TOTAL	23	3	14	1	2	2	1	-	-	-	-

Bekaa

District	Number of seats	Sunni	Shiite	Druze	Maronite	Roman Catholic	Roman Orthodox	Evangelical	Armenian Orthodox	Armenian Catholic	Minorities
Zahle	7	1	1	-	1	2	1	-	1	-	-
West Bekaa & Rahaya	6	2	1	1	1	-	1	-	-	-	-
Baalbek & Hermel	10	2	6	-	1	1	-	-	-	-	-
TOTAL	23	5	8	1	3	3	2	-	1	-	-

North Lebanon

District	Number of seats	Sunni	Shiite	Druze	Maronite	Roman Catholic	Roman Orthodox	Evangelical	Armenian Orthodox	Armenian Catholic	Minorities	Alawite
Tripoli	8	5	-	-	1	-	1	-	-	-	-	1
Miniye-Danniye	3	3	-	-	-	-	-	-	-	-	-	-
Akkar	7	3	-	-	1	-	2	-	-	-	-	1
Zghorta	3	-	-	-	3	-	-	-	-	-	-	-
Koura	3	-	-	-	-	-	3	-	-	-	-	-
Bechary	2	-	-	-	2	-	-	-	-	-	-	-
Batroun	2	-	-	-	2	-	-	-	-	-	-	-
TOTAL	28	11	-	-	9	-	6	-	-	-	-	2
OVERALL TOTAL	128	27	27	8	34	8	14	1	5	1	1	2

III. IMPORTANT ARTICLES ON CAMPAIGN FINANCE

MONITORING ARTICLES IN 2008 LEBANESE ELECTORAL LAW

Article 1

The parliament shall be made up of 128 deputies elected by a majority system for a mandate of four years. The voting shall be made universal by secret ballots and on one level.

Article 11

A commission, called “The Supervisory Commission on the Electoral Campaign,” shall be created. It shall be entrusted with the practice of functions stated in the present law and is linked

to the Minister of Interior and Municipalities. The Minister supervises its work and decides the Commission’s premises and attends its meetings whenever he wishes to. He shall chair the said meetings without participating in the voting.

Summary:

The Supervisory Commission on the Electoral Campaign (SCEC) was created to ensure compliance with campaign finance and media and advertising provisions as stipulated in the Electoral Law, under the supervision of the Minister of Interior and Municipalities.

Article 20

The competent civil society organizations may accompany and observe the elections provided they fulfill the following conditions:

- The organization should be Lebanese, non-political and non-profit, having duly lodged its articles of incorporation at least three years before the request filing date.
- It should not be connected to any political side. Its administrative board should not include any candidate running for elections.
- Its statutes should specify, for the last three years at least, objectives on the promotion of democracy, human rights, elections, transparency, or training related to these issues.
- The organization’s members should not be less than 100 at the filing date of the request pursuant to lists duly submitted to the competent public authorities.
- Its administrative board shall comply with a Code of Ethics established by the Ministry of Interior and Municipalities.

- The Ministry shall examine the received accreditation requests and verify the fulfillment of the conditions above. It may accept or revoke the request. In case of acceptance, the Commission shall determine the procedure of attending and observing the elections under decision issued by the Ministry at least one month before polling day.

The Ministry shall be in charge of studying the requests of election-related international organizations wishing to participate in the follow up of the electoral process, pursuant to conditions specified by it in due time.

Summary:

Competent CSOs may monitor the elections provided they fulfill the criteria outlined by the law.

Article 43

Parliamentary elections shall be obligatorily held on one day for all electoral districts within the sixty days preceding the expiry of the Parliament's mandate.

Article 55

1. The candidate must open with an operating bank in Lebanon an account under the name "Electoral Campaign Account." He shall attach to the candidacy application, a certificate from the said bank, proving the existence of such an account and mentioning the account number and owner's name.
2. This account shall not be subject to bank secrecy. The candidate shall be automatically considered as waiving the right to such secrecy upon the account opening.
3. All electoral contributions and expenses shall be exclusively made through this account during the period of electoral campaign.
4. Every candidate shall be in charge of determining the procedures and for receiving funds and contributions meant to fund the electoral campaign and paying electoral expenses, in conformity with the provision of the present law.
5. No amount exceeding 1 million LBP shall be received or paid unless by check.
6. Each candidate shall, upon filling the candidacy application, declare the name of his financial auditor under a notarized written letter submitted to the Commission.

Summary:

Candidates must open an electoral campaign account that is not subject to bank secrecy. All electoral contributions and expenses must be made through this account. All transactions exceeding 1 million LBP must be processed through checks. Furthermore, each candidate must appoint an auditor.

Article 56

1. The candidate may use his own money to fund his electoral campaign. The money of the spouse or any of the ascendants and descendants shall also be considered as the candidate's own money. All expenses contracted or paid by the candidate from his own money for his campaign shall be subject to an expenditure ceiling.
2. Only Lebanese natural or legal persons may offer contributions for a candidate's electoral campaign.
3. A candidate shall be strictly prohibited from accepting or receiving, whether directly or indirectly, contribution or aids from foreign states or from a non-Lebanese natural or legal person.
4. Any donation, cash or in-kind gift or subscription offered to the candidate, shall be considered a contribution to the electoral campaign funding.
5. The value of services provided for free by volunteers shall not be considered as contributions.
6. The total amount of all contributions received by a candidate for his electoral campaign shall not exceed the electoral expenditure ceiling.

Summary:

Candidates can use their own and/or family money for their campaigns. However, the sources of funding must be from "Lebanese natural or legal persons". Any donation offered to the candidate, shall be considered a contribution to electoral funding.

Article 57

The maximum limit of funds each candidate may spend on his electoral campaign shall be determined as follows:

- A **fixed flat amount** equivalent to **one hundred and fifty million Lebanese pounds**
- A **variable** part depending on the number of voters within his electoral district determined by virtue of a decree issued by the Council of Ministers upon the suggestion of the Minister of Interior and Municipalities.

Article 59

Financial donations including service provision or payment of money to voters such as (inter alia) in-kind and cash donations and support to individuals, charity, social, cultural, family, religious organizations or other, or sports clubs and all non-public institutions shall be prohibited during campaign period.

The above mentioned donations shall not be prohibited if they are granted by candidates or institutions owned or run by candidates who have been doing so on a regular basis since not less than three years prior to the commencement of the electoral campaign.

Summary:

Financial donations and in-kind assistance to individuals or groups are prohibited during the campaign period. However, similar grants are allowed if they have been going on for at least three years before the electoral campaign.

Article 61

1. After the elections, each candidate must draw up an exhaustive statement of account following the principles of accounting and including, in details, the total received contributions with their sources and dates and the total expenses paid or to be paid with their nature and dates during the electoral period.

2. This statement should be submitted to the Commission within one month after polling day along with supporting documents related to all account items, such as receipts, and disbursement notes, in addition to an exhaustive bank statement of electoral account showing all transactions made through this account since its opening until the submission of the said statement.

3. There shall be attached to the statement of account a declaration signed by each candidate – whether list or individual candidate – and notarized to be given a correct date. The candidate declares thereby, under his full responsibility, that the attached statement of account is correct, exhaustive and includes all received contributions and paid or to be paid expenses pertaining to the electoral campaign. He shall also expressly declare that there are no other cash or in-kind expenses or funds paid in cash or through other bank accounts or by third parties.

Summary:

Each candidate must draw up a statement of account showing all transactions through the campaign period and this statement must be submitted to the SCEC along with all supporting documents within a month following the polling day. Candidates/Electoral lists must declare that the statement contains all electoral expenses.

Article 62

1. Whoever intentionally breaches any of the provisions of this chapter shall be sentenced to 6 months imprisonment at most and to a fine ranging between 50 million LBP and 100 million LBP, or to one of the said sentences, with no prejudice to sanctions of penal crimes as per the law.
 2. When the challenge is submitted, the Commission's report and the candidate's exhaustive statement of account shall be sent to the Constitutional Council. The said documents shall be attached to the candidate's election challenge file.
-

Summary:

Candidates who intentionally breach the campaign finance provisions shall be sentenced to up to 6 months of imprisonment in addition to a monetary fine or to one of the sentences. The commission's report can be added to the election challenge file of the candidate in case such a challenge was raised.

Article 71

1. Public utilities, governmental institutions, private or public universities, faculties, institutes and schools and houses of worship may not be used for electoral events and rallies or for posting pictures or for electoral promotion purposes.
 2. Civil servants and employees of public institutions, municipalities, and municipal unions may not use their powers in favor of any candidate or list.
-

Summary:

Public and official venues, universities, schools, and houses of worship may not be used for any electoral event or publicity. Civil servants and employees of public institutions may not use their resources in favor of any candidate or electoral list.

ARTICLES IN INTERNATIONAL CONVENTIONS

Act 7.3 of United Nations Convention Against Corruption (UNCAC) which has been ratified by the Lebanese government (33/ 16-10-2008) stipulates that:

Each State Party shall also consider taking appropriate legislative and administrative measures, consistent with the objectives of this Convention and in accordance with the fundamental principles of its domestic law, to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties.

IV. WHAT TO MONITOR?

The Lebanese electoral law specifies the main categories of campaign spending and expenditure. The following are specific guidelines that Campaign Finance Monitors (CFMs) should closely scrutinize:

Law Number 25 Parliamentary Elections
Chapter V Regulations for Electoral Funding and Spending (Article 58)

- Rental of electoral offices and all related charges;
- Organization of rallies, festivals, public meetings, and election-related banquets;
- Preparation, publication, and distribution of advertising and promotional material such as books, booklets, bulletins, publications, and letters sent by regular or electronic mail;
- Compensations paid to party agents and persons involved in the electoral campaign;
- Design, printing, distribution, and posting of pictures, posters, and billboards;
- Transportation fees of electoral campaign staff and voters; and
- Electoral advertising costs and any other costs paid to any radio, TV, newspaper, magazine, or any other publication as means for electoral campaigning.

More specifically, day-to-day examples of what to monitor throughout the campaign are highlighted in the tables below:

1. Campaign Expenditures

Sample Public Event Budget

Item	Do I monitor it?	How?
Venue		
Rental/permit cost	Yes	Provide an estimate of the rent through direct observation and contact with local individuals and businesses
Chair rental	Yes	Direct observation and contact with local individuals and businesses
Tents rental	Yes	Direct observation and contact with local individuals and businesses
Stage	Yes	Direct observation and contact with local individuals and businesses
Barricade	Yes	Direct observation and contact with local individuals and businesses
Decoration (flowers, balloons, etc.)	Yes	Direct observation and contact with local individuals and businesses

Item	Do I monitor it?	How?
A/V Equipment		
Loudspeakers/stereo	Yes	Direct observation
Televisions and screens	Yes	Direct observation
Lighting	Yes	Direct observation
Entertainment		
DJs or musician	Yes	Direct observation and contact with local individuals and businesses
Fireworks	Yes	Direct observation and contact with local individuals and businesses
Food and drink	Yes	Direct observation and contact with local individuals and businesses/interviews and surveys
Personnel		
Security	Yes	Direct observation and contact with local individuals and businesses
Presenters/ Master of ceremony	Yes	Direct observation
Event planner	Yes	Direct observation
Administrative staff	Yes	Direct observation and contact with local individuals and businesses
Event-Specific Publicity		
Billboards/posters	Yes	Direct observation
Flyers	Yes	Direct observation
Car microphones	If possible	Direct observation
SMS	Yes	Direct observation and contact with local individuals and businesses
Invitation through media	Yes	Direct observation
Invitation cards	Yes	Direct observation and contact with local individuals and businesses

Item	Do I monitor it?	How?
Flags	Yes	Direct observation
Transportation		
Taxis/Buses	Yes	Direct observation and contact with local individuals and businesses
Fuel cost	Yes	Direct observation and contact with local individuals and businesses
Distribution of Gifts During Event		
T-shirts/hats/bags/pens	Yes	Direct observation and contact with local individuals and businesses
Cash	Yes	Direct observation and contact with local individuals and businesses
Promotional material	Yes	Direct observation and contact with local individuals and businesses
Distribution of benefits to voters		
Cash payment	Yes	Direct observation and contact with local individuals and businesses/archival data/official announcement
Fuel coupons	Yes	Direct observation and contact with local individuals and businesses/archival data/official announcement

Tips:

Make sure event organizers are aware of your presence and fully understand your role; otherwise angry supporters might cause you trouble, especially when you are taking pictures.

Try to reach the event site early, before the crowds arrive in order to have additional time. This will ease the process of tracking logistics and equipment, as well as taking pictures.

Sample Campaign Budget

Item	Do I monitor it?	How?
Facilities		
Headquarters rent	Yes	Direct observation and contact with local individuals and businesses
Field offices	Yes	Direct observation and contact with local individuals and businesses
Utilities (water, gas, electricity, phone, TV, internet)	Yes	Direct observation and contact with local individuals and businesses
Campaign staff		
Full-time staff	Yes	Direct observation and contact with local individuals and businesses
Election day staff (observers, delegates)	Yes	Direct observation and contact with local individuals and businesses
Security	Yes	Direct observation and contact with local individuals and businesses
Transportation		
Campaign cars	Yes	Direct observation and contact with local individuals and businesses
Rides to polls	Yes	Direct observation and contact with local individuals and businesses
Taxis/ buses	Yes	Direct observation and contact with local individuals and businesses
Fuel costs	Yes	Direct observation and contact with local individuals and businesses
Miscellaneous Expenses		
Office supplies	Yes	Interviews/surveys
Food for staff	Yes	Interviews/surveys
Advertisement (Media)		
TV	No	
Radio	No	
Billboard	Yes	Direct observation

Item	Do I monitor it?	How?
Posters and pictures	Yes	Direct observation
Website	No	
Flyers	Yes	Direct observation
Advertising buses	Yes	Direct observation
Talk shows	No	
Magazines and newspapers	No	
Songs	Yes	Direct observation and contact with local individuals and businesses
Provision of Social Services		
Charity (cancer center, orphanages, etc.)	Yes	Archival data, official announcement, and local contact
Financial aid	Yes	Archival data, official announcement, and local contact
Health services	Yes	Archival data, official announcement, and local contact
Tuition and educational material	Yes	Archival data, official announcement, and local contact
Phone cards	Yes	Archival data, official announcement, and local contact
Diesel	Yes	Archival data, official announcement, and local contact
Asphalt	Yes	Direct observation and contact with local individuals
Cash Payment	Yes	Direct observation and contact with local individuals

Tips:

Develop your own database on campaign finance. For instance, call car rental offices in your region and inquire about the availability of cars. Check when cars were rented and at what cost.

Compare social services provided this year to what used to be provided previously.

2. Abuse of Official Resources

Specific examples of what to monitor for abuse of official resources are stated in the table below:

Item	Do I monitor it?	How?
Personnel		
Involvement of public sector employees in campaign activities during working hours	Yes	Direct observation and contact with local individuals
Organization of campaign events with the mandatory attendance of public sector employees	Yes	Direct observation and contact with local individuals and businesses
Venues		
Unequal use of public (state and municipal) premises for campaign purposes	Yes	Direct observation and contact with local individuals
Use of the physical or logistical infrastructure of public offices and premises for campaign activities (hosting events, storing campaign material, other)	Yes	Direct observation and contact with local individuals
Use of public events organized by state or municipal authorities for campaign-related purposes (opening a state funded development project, etc.)	Yes	Direct observation and contact with local individuals and business and media coverage
Resources: Use of public (state or municipal) resources for campaign purposes free of charge or at discounted rates		
Vehicles	Yes	Direct observation and contact with local individuals
Phones and communication networks	Yes	Direct observation and contact with local individuals
State owned media (national TV, radio, municipal newsletter)	Yes	Direct observation and contact with local individuals
Direct distribution of budget money to voters or distribution of goods and services purchased with public funds to voters	Yes	Direct observation and contact with local individuals

Item	Do I monitor it?	How?
Engagement of state enterprises, institutes, think tanks, and state-supported nonprofit organizations in campaign activities	Yes	Direct observation and contact with local individuals
Election Day		
Use of state vehicles to transport voters to polling stations	Yes	Direct observation and contact with local individuals
Use of public (state and municipal) premises as campaign center (meeting point for voters, “operation room” for campaign staff)	Yes	Direct observation and contact with local individuals

Questions that will help you identify possible abuse of official resources:

- **Event location:** Are the premises used, state owned?
- **Individuals involved in campaigning:** Are civil servants campaigning?
- **Attendees at campaign events:** Is attendance of civil servants forced/mandatory?
- **Ownership of vehicles used for transportation of attendees to political events:** Are state vehicles being used for campaign purposes?
- **Campaign materials:** Who covered the printings costs? Where were the materials stored?

Tips:

Visit public institutions during working hours, especially during events, to check whether premises are being used for campaigning purposes, or if employees are involved in any sort of campaigning activities.

Get to know key civil servants responsible for voter registration including senior municipal workers, public school principals, and district registrar ‘s officers, .

Keep in mind all levels of state institutions from ministry to municipality.

VOTE BUYING

Buying votes is one of the most widespread violations of campaign financing, and remains the most frequently

discussed in the media and by candidates themselves.

Various aspects of campaign finance are indirectly related to vote buying. From providing services and social assistance to the appointment of a large number of delegates to ensure their and their families' votes, all are considered indirect vote buying.

Buying votes is one of the most difficult campaign tactics to monitor because it is not a tangible act. In addition, candidates tend to keep vote buying undisclosed whereas they highlight the rest of their expenses in order to get the required exposure.

Vote buying is usually a collective phenomenon. In most cases, the electoral key figures set the agreement with the candidate delegate and get half the funds before Election Day and the rest after the votes are counted.

In previous elections, the electoral card has reinforced this dilemma. Specifically, it has been used as a tool of control as candidates used to seize it from citizens and return it back on Election Day only to those who promised their votes. The cancellation of the electoral card in the 2009 elections and its replacement with the ID card is a way to prevent such abuses.

Monitoring vote buying relies on following potential leads, using the network of contacts to validate or deny them, and, most importantly, reporting on any suspicious act on the Election Day.

Key electoral figures, from prominent figures in families to community leaders, usually play an influential role on Election Day. They often utilize their position to provide services to voters including: transportation, registration procedures and priority placement at the polling station. It is not uncommon either that a customized ballot be also provided to voters. Such behavior should be registered by CFMs who can identify these figures as potential interviewees. CFMs should observe their behavior, noting how they react to delegates and whether their level of involvement increases as elections approach.

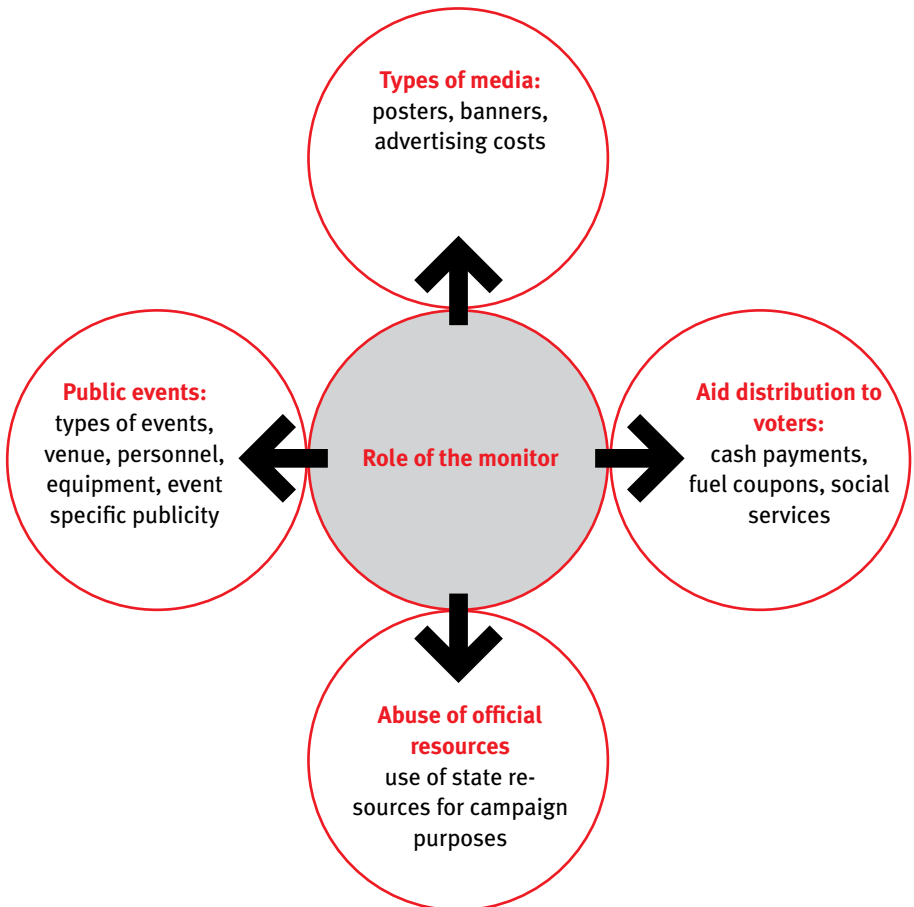
Tips:

Municipal leaders, Mokhtars, displaced families, recently naturalized Lebanese, and politically undecided families of poor background are usually more vulnerable to vote buying.

Be careful not to misdiagnose. Not every one of the above mentioned groups who comes together on E-day is a proved convict.

When you hear about a rumor of vote buying, check the voter registration lists. Observe the behavior of voters on E-day, and then validate your suspicions by comparing and analyzing the results of each ballot box when possible.

What to Monitor before Election Day



V. HOW TO MONITOR BEFORE ELECTION DAY

The monitoring process before Election Day will consist of the following two phases:

- Pre-campaign monitoring: In the first phase, monitors visit their assigned regions two to three times and perform preliminary assessments. These assessments will serve as a baseline against which future campaign activities will be measured. More specifically, monitors are asked to provide an estimate of the number of posters and banners. They will also have to identify the provision of social services including among others, health, education, and infrastructure in their assigned region. Following the preliminary assessment, monitors will track campaign activities by visiting the region once monthly till the beginning of the electoral campaign.

- Campaign monitoring: three months before the elections, monitors will conduct four assessment rounds per month. In addition, they will focus on rallies, public events, and other campaign activities. Throughout the monitoring process, CFMs must track activities, news, events, and other campaigning tools occurring outside the scope of their visits.

Tips:

Establishing good contacts with key people in the district and getting to know the region well always helps; for example, candidate delegates, heads of municipalities, NGOs, print shop owners, car rental companies, and others can be important sources of information.

For events organized for a list of candidates, try to find out who financed the event or simply divide the cost over all participating candidates.

ELECTION DAY

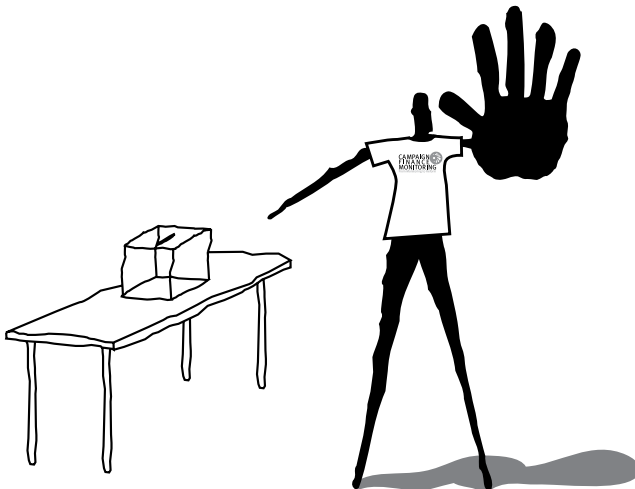
On Election Day, Campaign Finance Monitoring is also be divided into two phases:

The first phase occurs before Election Day. Monitors must familiarize themselves with the polling stations' locations, and should draw a road map. This map will be useful to visit the sites on Election Day, when streets and polling stations will be crowded. Furthermore, monitors must be attuned to tips and potential leads collected from their contacts' network on planned activities for Election Day. Close coordination with other election monitors will be of valuable help.

Tips:

Choose a sample of representative polling centers as a basis during critical times. For example, during lunch hour, it is impossible to visit all centers and count the number of sandwiches. Instead, you should compare data collected from five representative centers on the quantity/type of food offered to delegates and multiply by number of delegates throughout the district.

Coordinate with other monitors such as the monitors of CLOE on what to look for during their tours. Set a coordination plan for exchanging this data throughout Election Day. Keep the contacts of their district coordinator with you at all times.



The second phase occurs on Election Day. The monitors should closely note all expenses exclusive for that day. Examples can be found in the table below.

Item	Do I monitor it?	How?
Human resources		
Fixed delegates	Yes	Direct observation and contact with local individuals and monitors
Roaming delegates	Yes	Direct observation and contact with local individuals and monitors
Food		
Breakfast	Yes	Direct observation and contact with local individuals and monitors
Lunch	Yes	Direct observation and contact with local individuals and monitors
Dinner (during vote counting)	Yes	Direct observation and contact with local individuals and monitors
Food transportation	Yes	Direct observation and contact with local individuals and monitors
Transportation		
Rented cars	Yes	Direct observation and contact with local individuals and monitors and businesses
Fuel coupons distributed	Yes	Direct observation and contact with local individuals and monitors and businesses
Transportation to polling centers	Yes	Direct observation and contact with local individuals and monitors and businesses
Communication		
Phone cards	Yes	Direct observation and contact with local individuals and monitors and businesses
Wireless communication network	Yes	Direct observation and contact with local individuals and monitors and businesses

Item	Do I monitor it?	How?
Venue rental		
Temporary polling tents and centers established in polling station areas	Yes	Direct observation and contact with local individuals and monitors
Miscellaneous expenses		
Vote buying	Yes	Direct observation and contact with local individuals and monitors and businesses
Items distributed	Yes	Direct observation and contact with local individuals and monitors and businesses
Promotional material		
T-shirts	Yes	Direct observation and contact with local individuals and monitors and businesses
	Yes	Direct observation and contact with local individuals and monitors and businesses
Caps	Yes	Direct observation and contact with local individuals and monitors and businesses
Bags/stationery	Yes	Direct observation and contact with local individuals and monitors and businesses
Loudspeakers/audio	Yes	Direct observation and contact with local individuals and monitors and businesses

Tips:

Since every candidate has the right to a limited number of party agents, some political parties present more than one candidate for the same seat in order to increase their number of party agents.

A common abuse of official resources during Election Day is the intervention of municipal heads and the use of the municipalities (which in some cases are assigned polling stations) for meetings of voters.

VI. RULES & GUIDELINES AND THE CODE OF CONDUCT

Rules and Guidelines for Monitors
Abide by the Campaign Finance Monitoring code of conduct of LTA
Attend all campaign events assigned for monitoring
Attach to the monitoring template a form that includes the most important observations in the attended events or completed rounds
Take two pictures of the event (whenever possible). The pictures should target, the equipment, the buses, the sound system, and any other element that could be related to campaign finance and expenditure
Always be safe. Do not put yourself in any compromising situation
You should be equipped with a cellular phone
Attend the ceremony from the beginning to the end
Complete the template fairly and impartially
Familiarize yourself with the new electoral law and its campaign finance provisions
You may accept invitations for food and beverages at a campaign event
You may not accept any rewards, compensation, or help from representatives of political parties
Dress code should be decent and with neutral colors
Adhere to interview guidelines and questions
Try to work and attend events in pairs
If there are two events at the same time, work individually
Write the report on the same day, and submit your results to LTA's headquarters no later than the following week.

The Lebanese Transparency Association (LTA) Code of Conduct For Campaign Finance Monitors (CFMs)

Why does the Lebanese Transparency Association prepare a Code of Conduct for its CFMs?

Stemming from	The fact that free, fair and transparent parliamentary elections are the cornerstone for the promotion of stability in Lebanon and the starting point towards the establishment of the principles of good governance and the rule of law.
Stemming from	The fact that monitoring parliamentary elections neutrally and transparently is an incentive that drives people to participate in elections; to express their views freely and democratically; and to reinforce their confidence in results.
Stemming from	The right that is granted to competent and professional Civil Society Organizations (CSOs) that are politically and financially independent to monitor elections as stipulated in article 20 of the new electoral law, (No. 25 in 2008)..
Stemming from	The influence that CSOs have started to play in this field.

What are the rules of conduct that must be respected by the monitors?

Commitment to the Principles and Guidelines of the Lebanese Transparency Association	<ol style="list-style-type: none">1. CFMs have to respect the objectives of LTA, which seeks to apply the principles of good governance, transparency, and accountability in Lebanon.2. CFMs must adhere to the guidelines of LTA and participate in all required meetings and training sessions. CFMs should be in continuous touch with LTA staff and inform them of problems faced in the implementation of their duties, and inform LTA in case they were offered bribes and rewards or in case they were blackmailed by one of the candidates or political parties.
Maintaining Political Neutrality Throughout the Entire Period of Work as a CFMs	<ol style="list-style-type: none">1. CFMs must identify themselves only as impartial observers from LTA.2. CFMs must refuse any remuneration, compensation, or assistance from candidates and any political actor.3. CFMs must not make any statement of any kind or speak to the media without reference to LTA.

<p>Professionalism and Commitment to Work as a Team During the Process of Monitoring Campaign Finance</p>	<ol style="list-style-type: none">1. CFMs have to observe the electoral events effectively without being biased. CFMs should maintain their neutrality during the course of these events, and impartially take the required notes and collect the necessary information vital to the success of their role as monitors.2. CFMs should cooperate and coordinate among themselves during the period of observation to ensure the accomplishment of their mission and the success of civil society in effectively monitoring parliamentary elections in a transparent and fair manner.3. CFMs must commit to sending impartial, transparent, and accurate observation reports to LTA including a listing of facts and figures. CFMs are not required to provide any political analysis.
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Signature to commit to the principles mentioned above

As a volunteer who works as a monitor in the Campaign Finance Monitoring project, implemented by the Lebanese Transparency Association (LTA) in collaboration with the Lebanese Association for Democratic Elections (LADE) and other organizations, I hereby commit myself to the fulfillment of my duties and pledge to work towards implementing and not wavering on the points and the principles stated in the Code of Conduct above:

Date	Signature	District	Monitor
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VII. COMPENSATION

LTA will be providing CFMs a 40USD/day compensation to cover expenses including telephone recharges, coffee break, and meals.

LTA will also be covering transportation fees, based on of 400LBP/km rate



VIII. CFM FREQUENTLY ASKED QUESTIONS

1- Who are you and what are you doing?

I am a monitor with the Lebanese Transparency Association. We are working on a project that aims at monitoring campaign finance. We are an organization with a permit from the Ministry of Interior; we belong to the Civil Campaign for Electoral Reform (CCER).

2- What is the Civil Campaign for Electoral Reform (CCER)

CCER is a coalition of Lebanese NGOs that seeks to introduce reforms to electoral law and to enhance electoral culture in Lebanon.

3- Why are you monitoring us?

As civil society, we monitor all Lebanese political factions equally. We are trying to ensure free, fair, and transparent elections to provide the appropriate representation of the Lebanese society. Our monitoring activities comply with article 20 of the new electoral law that allows civil society organizations to monitor elections.

4- Who is funding this campaign/project?

The donors for this project are international organizations that support democracy and transparency in Lebanon, including the United Kingdom Embassy, the Open Society Institute, and the Global Peace and Security Fund - Glyn Berry Program.

5- Why are you taking pictures in this event?

We are a non-partisan organization. We are taking pictures of all public events organized by all political parties and candidates. We are not taking pictures of candidates themselves. We do not seek to accuse any political figure or party.

6- Do you as an organization belong to any political faction?

LTA is a Non Governmental Organization (NGO). LTA is not affiliated with any Lebanese politician or political faction. LTA is the Lebanese chapter of Transparency International, an international NGO promoting transparency throughout the world.

7- Who is the president of your NGO?

LTA has a board of directors and full-time staff members, none of which is a political figure.

8- Do you as a monitor belong to any political faction?

I do not belong or support any political faction. I am simply a monitor at LTA.

9- Are you an official employee at the Ministry of Interior?

NO, I am a monitor for an NGO, the Lebanese Transparency Association.

10- Do you have any right to punish those who do not abide by the law?

As a monitor, I do not have any legal authority to punish anyone. I will be trying to help the public to get an objective image of campaign finance.

11- Have you monitored elections before?

This is the first initiative that aims at monitoring campaign finance. In previous elections, NGOs used to monitor Election Day only and will do so this year, too. The Campaign Finance Monitoring project is divided into three phases: pre-election, during the election, and post-elections.

12- Who is in charge for this project?

Lebanese Transparency Association (LTA)

13- How are your candidate/other candidates performing? Is anyone breaking the law?

We are not allowed to disclose any information at this stage. All findings will be published in the final report.

14- What is your full name, where do you live, and where are you from?

My name is _____. If you would like to have more information, you can contact LTA. However, I cannot disclose my address.

15- Will the public have access to the information you are taking, and are you going to publish a report disclosing the material you possess?

When the elections end, all information will be in a published detailed report.

16- If a journalist approaches you as a monitor and asked you for an interview or a comment, what would you say?

Sorry, but I cannot provide you with an interview. However, you are encouraged to contact LTA, and you will receive all needed information.

17- If you found yourself in a hostile situation, what would you do?

Try to reach the nearest police station, and get immediately in touch with the office.

18- What kind of relation do you have with the Supervisory Commission on the Electoral Campaign (SCEC)?

The work we do is separate from the commission's work. We will be sending a shadow report to the Commission. In a way, we monitor the Commission's work.

IX. INTERVIEW GUIDELINES AND QUESTIONS

Who to interview?

A. OFFICIAL INTERVIEWS: TO MAKE YOURSELF KNOWN AND OBTAIN ORIGINAL DATA FROM:

- Candidates
- Campaign personnel (head of campaign/spokesperson/public relations officer/delegates)

- Municipal leaders
- Key political supporters (head of political party division in the village/regular supporters)

B. UNOFFICIAL INTERVIEWS: VALIDATE DATA, HEAR RUMORS, FIND OUT WHAT HAPPENED IN YOUR ABSENCE

- Party supporters
- Shop owners (they are usually in good contact with everyone and know what is going on)
- Related business owners (caterers, print shops, gas stations, car rental, sound systems, others)
- Municipal workers (police, logistics - they tend to know when posters and banners were distributed; how the municipality is being used; and where events have been planned)
- Employees in companies owned by candidates

How to conduct an interview? ²

INTERVIEWS CAN BE USED TO

- Collect information on the use of official resources.
- Highlight the abuse of official resource by parties or candidates.
- Provide firsthand figures on the use of official resources from those who actually use them.

PREPARING FOR AN INTERVIEW

- Familiarize yourself with interviewees' background including their political affiliation.
- Prepare your interview questions ahead of time.
- Choose a setting with little distraction. Avoid strong lighting or loud sounds, and ensure the interviewee is comfortable. Often, interviewees may feel more comfortable at their own work location or homes.
- Explain the purpose of the interview.
- Explain the format of the interview. Explain the form and content of

² LTA based itself on interview questions in: Open society Institut. Monitoring Election Campaign Finance: A Handbook for NGOs. OSI: New York.2005. p118

interview you are conducting.

- Indicate how long the interview usually takes.
- Ask them if they have any questions before you get started with the interview.
- Start with an ice-breaking general question and then probe into your intended questions.
- Do not count on your memory to recall their answers. Ask for permission to record the interview, or take notes during the interview.

SEQUENCE OF QUESTIONS

- Get the respondents involved in the interview as early as possible.
- Before asking about controversial matters, first ask about some facts. With this approach, respondents can more easily engage in the interview before addressing deeper and more sensitive issues.
- Spread fact-based questions throughout the interview to avoid long lists of fact-based questions, which tends to leave respondents disengaged.
- Ask questions about the present before questions about the past or future.
- The last questions might allow respondents to provide any other information they wish to add and their impressions of the interview.

WORDING OF QUESTIONS

- Questions should be open-ended. Respondents should be able to choose their own terms when answering questions.
- Questions should be as neutral as possible. Avoid wording that might influence answers such as judgmental wording. Be meticulous, especially with controversial wording that might show you as biased, for example using February 14 group or March 14 group.
- Questions should be asked one at a time.
- Questions should be worded clearly, this implies being familiar with the terminology of the electoral law and the project.
- Be careful with asking “why” questions. This type of question presumes a cause-effect relationship that may not truly exist. These questions may also cause respondents to feel defensive.



Tips:

Be prepared.

Be confident and relaxed during the interview. Do not disclose any information about other candidates or comment on direct accusations to any side.

Control your body language. Do not show any facial or change in your voice tone for anything that is said – just take notes.

Ask for clarification on anything you do not understand, and ask about other sources that can confirm a vague statement.

ADDITIONAL QUESTIONS*For candidates (and all official interviews)*

- Do you support campaign finance regulations, or do you think it is impossible to apply such regulations? Why? (His/her answer on why it is impossible can give you hints on violations he or others are committing.)
- Who supports you in your campaign? (Keep the question broad and open, and probe according to answer.)
- Is your status as a (previous or current) Minister/MP/Municipal Leader helpful? We heard people see you as a good service provider.

For campaign managers and staff

- In addition to the variable cost that will be determined for each district, the electoral law sets a fixed ceiling on campaign spending equivalent to one hundred and fifty million Lebanese pounds. Do you think this ceiling is sufficient? If not, what should the ceiling be?

For all interviews

- Some politicians are using public institutions for electoral benefits. What is your opinion about that?
- The state is criticized for failing to provide the required services to citizens; do you think that a political party has the capacity to fill this gap?
- Do you think that the elections' results can be affected if a public servant works for your opponent's campaign? If yes, how?
- Is vote buying a common practice in your region? If yes, how?
- Have you attended/organized any rallies or campaign events? (ask this question to employees of companies affiliated with candidates or to public servants.)

For shop owners

- Is the elections season good for business? Does it improve the situation? If yes, how?

X. PREVIOUS MONITORING EXPERIENCES

Interviewing the candidates and their campaign managers proved to be useful.

Candidates were proud of their expenditures; they make them visible and often publicize their donations and contributions in the media.

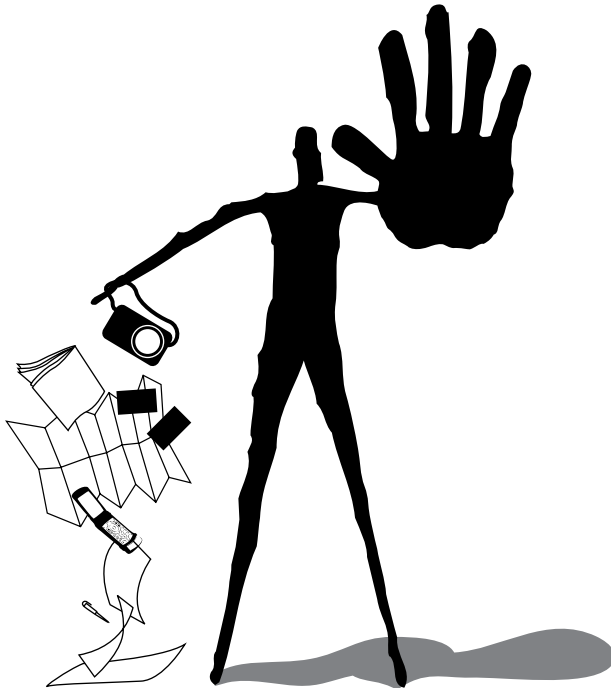
Candidates rarely disclose their personal expenditures. Therefore, the opponent is always a good source of information. Former candidates and MPs can be used as a good source of information.

Always verify information by interviewing the candidate, his opponent, and an independent party if available.

Form a network of acquaintances/friends that covers the whole district and that knows the region well, this will help you in staying updated on rumors/events/activities.

XI. PACKAGE FOR MONITORS

- Personal Identification
- Telephone (charged) in case of emergency
- Camera (can be a cell phone camera)
- LTA Identification Card
- Ministry of Interior documentation
- CFM manual
- List of contact of all LTA monitors and offices as well as other organizations' monitors
- Pen and notepad
- On Election Day: a map of the district showing polling locations



XII. APPENDIX:



(1) Reporting Forms

REPORTING TEMPLATE

Name of Monitors: _____

Date of Monitoring: _____

Areas Covered: _____

Pictures

Name of candidate or political party	Number of big size pictures	Number of medium size picture	Number of small size pictures

Banners

Name of candidate or political party	Number

Public Events

Name of candidate or political party (host)	Location

Please refer to template for public events

Donations (all types)

Name of candidate or political party	Description	Amount

State the gross amount of invitations, dinners, and donations in US dollars or Lebanese pounds.

Comments:



Reporting template for public event ³

Name of Monitor: _____

Party/candidate: _____

Type of event: _____

Date: _____

Location: _____

Number of attendees: _____

Meeting	Open space	Indoor stadium	Town square	Meeting room of local administration	Cultural venue	Hotel meeting room	Outdoor stadium	Res- taurant meeting room
Reception	Cultural venue	Hotel meeting room	Res- taurant meeting room	Meeting room of local administration				
Seminar or Lecture	Cultural venue	Hotel meeting room	Res- taurant meeting room	Meeting room of local administration				

POLITICIANS AND IMPORTANT PERSONALITIES:

NAME:

FUNCTION/TITLE:

ENTERTAINMENT: IDENTIFICATION OF MUSICAL PERFORMERS/LENGTH OF PERFORMANCE

NAME:

FUNCTION/TITLE/LENGTH:

TECHNICAL EQUIPMENT (IF FOUND DESCRIBE IN DETAILS):

STAGE (IF FOUND DESCRIBE IN DETAILS):

ELECTRICITY (IF FOUND SPECIFY SOURCE):

³ Ibid, p168

TRANSPORTATION PROVIDED:

Cars:	Number:	Owned by:
Buses:	Number:	Owned by:
Vans:	Number:	Owned by:
Limousines:	Number:	Owned by:

REFRESHMENTS (IF YES, DESCRIBE):

PROMOTIONAL MATERIALS/TREATS (IF YES, APPROXIMATE QUANTITIES):

Items	Quantity
T-shirts	
Balloons	
Printed materials	
Caps	
Pens	
Lighters	
Stickers	
Flags	
Other (please specify)	

PROMOTION OF EVENT:

POSTERS:

PUBLIC ANNOUNCEMENTS:

MEDIA ANNOUNCEMENTS:

HOT AIR BALLOON:

BUS:

OTHERS:

DESCRIBE THE EVENT (LENGTH, ACTIVITIES, ATTENDANCE):



Election Day Monitoring Template

THE FOLLOWING TEMPLATE IS TO BE FILLED BY CFMS ON ELECTION DAY.
ONE TEMPLATE IS TO BE FILLED FOR EACH CANDIDATE/LIST IN EACH VISITED POLLING STATION.

Name of Monitor: _____
 District: _____
 Area: _____
 Polling station: _____
 Candidate/List: _____

Human resources	Inside polling station	Outside polling station
Number of fixed delegates		
Number of roaming delegates		
Food	Number of meals	Description of meals
Breakfast		(Briefly describe content of meal)
Lunch		(Briefly describe content of meal)
Dinner (during vote counting)		(Briefly describe content of meal)
Food transportation	(Include how the food was transported)	
Transportation	Number	Description
Rented cars		(Type of rented car)
Fuel coupons distributed		(Value of fuel coupon)
Transportation to polling centers	(Number of vehicles used)	(Description of vehicles used)
Communication	Number	Description
Phone cards		
Wireless communication network		

Venue rental	Number	Description
Temporary polling tents and centers formed close to polling stations		(Description of temporary center)
Miscellaneous expenses	Present\not present	Description
Vote Buying		
Items distributed		(Roses/pictures/souvenirs)
Promotional material	Number	Description
T-shirts		
Caps		
Bags/Stationery		
Loud Speakers/Audio		

The Lebanese Transparency Association (LTA) seeks to monitor campaign finance during the 2009 Parliamentary Elections in order to ensure that the electoral process is administered in accordance with democratic principles that promote good governance. As such, LTA has launched its Campaign Finance Monitoring Program in August 2008.

LTA believes that successful elections require a monitoring process that is independent and objective – a mechanism that is capable of enforcing electoral laws and regulations.

This manual, based on international best practices, seeks to provide LTA's monitors with the necessary information and monitoring guidelines that will assist them in their activities.