TOLERANCE OF HATE SPEECH AS A VERBAL CRIME -
A SAFETY FACTOR IN THE SOCIETY

Dragan Sekulovski, MA
PhD Candidate at the Faculty of Security – Skopje
dsekulovski@znm.org.mk
dragan.sekulovski@fbuklo.onmicrosoft.com

Abstract

The increase of hate speech and aggressive speech that jeopardizes the safety of individuals and groups has been evident in the Republic of North Macedonia in the recent years. Such examples of verbal crimes have mostly been seen on social networks but also in traditional media. This negative trend has a high level on impunity, given the poor court practice on crimes related to hate speech or other serious verbal delicts. Individual journalists and/or media outlets are often targeted as a subject of verbal assaults on social media and other internet platforms, but also in person. This makes their working environment unsafe. Journalists and media workers who are threatened and subjected to attacks are facing self-censorship and by this, the private safety of individuals affects the right on information which is a constitutional right to all citizens.

Within this research, collected data from 26 basic courts throughout the country resulting in five court cases related to hate speech is a subject of elaboration together with several qualitative interviews with media and legal professionals who have an extensive practice in freedom of expression. A broader context is given to a specific part of the national legislation in relation to hate speech, with reference to some of the local reports by relevant civil society organisations.

The expected result is to prove the hypothesis that individual threats related to abusing of the freedom of speech is infringing the freedom of information consequently. Furthermore, if there is tolerance to verbal crimes, primarily hate speech, towards individuals and groups, and especially towards media workers, the freedom of press will suffer in general, and journalists will be prevented from performing/doing their duties professionally.

1. INTRODUCTION

A spoken word can kill. This axiom could not be refuted in the philosophical debate in history, and from today’s point of view given the information progress and globalization, the risk of abuse of freedom of expression and threatening the human security is greater than ever. This paper attempts to elaborate the issue of whether a spoken word can kill more than in was the case in the past.

Human rights and freedoms are the subject of many philosophical considerations. In this regards, John Stuart Mill in his philosophical work “On Liberty (Mill, 1869)”, published in the mid-nineteenth century, says: “If all mankind minus one were of one opinion, and only one person was of the contrary opinion, mankind would be no more justified in silencing that one person, than he, if he had the power, would be justified in
silencing mankind”. This thought emphasizes the importance of the individual’s freedom of expression and points to the risk that an individual in a position of power may abuse this right to subdue the majority.

The power of the spoken word in modern times is more influential than ever and there are several reasons why this is so, confirming this fact. The democratic countries pertain to have the ability to keep the balance between the right to express and to keep the citizens safe when the speech is infringing other rights. Hence, it is impossible to have functional democratic processes in any society without the right to freedom of expression. People express their thoughts through speech, write novels, journal articles, poetry and satire, draw drawings, make pictures, caricatures, create music, play, paint graffiti, make sculptures, and communicate online. All these forms of expression help a person to translate thought into expression. The more democratic the society, the greater the freedom of expression, because tolerance, respect for the voiced and individual opinions is one of the most important elements for progress. For these reasons, the right to freedom of expression, even though it does not fall among the rights that have absolute protection with the European Convention, occupies a central place among the conventional rights. (Trajkovska, 2018)

In this regard, what are the three arguments?

First, in recent years, everyday communication among people tends to be digital on closed applications or semi-open social networks, and one of the most dominant is the Facebook network. More than a third of the people in the world or 2.7 billion have their own Facebook profile, and in our country, according to Dataportal (Kepios, 2021), out of 1.69 million Internet users, over 1.1 million use social networks, mostly Facebook. This means that more than half of the citizens in the Republic of North Macedonia who have access to the Internet are actively or passively present on social networks, which is significantly higher than the world average.

The second argument is the present ignorance of the risks of abuse of freedom of expression and the use of hate speech. Even on social networks, abuse of the free speech can cause social tensions that may disrupt public order and peace. An additional factor is the relatively low culture in public communication of the politicians in the Republic of North Macedonia, which is particularly present during the party campaigns specifically before parliamentary or local elections. In presence of obvious polarization by political party affiliation in the society through this, often inappropriate communication by most of the politicians, groups of citizens are encouraged to spread hatred and intolerance, mostly on social networks, but also at public gatherings. The nature of hatred expressed in this context is usually by party affiliation but it can often be on other grounds such as ethnic, religious, or sexual.

Third, and perhaps the most important, is the impunity for hate speech and publicly articulated threats, especially on social networks in the local context, which are, unfortunately, often present. According to a publicly available research by local civil society organizations working on these issues, such as the Association of Journalists of Macedonia and the Helsinki Committee, there are currently only a few final judgments that the Criminal Code qualifies as hate speech and only few publicly expressed threats that endanger the safety of an individual or a group of people. This trend is also noted by the Council of Europe: The feeling of impunity given by the possibility to publish in an anonymous manner and the thought of a virtual environment as free from consequences have contributed to an increased level of sexist hate speech and hate speech in general. (CoE, 2016)

The combination of the three factors of easily accessible internet or digital platforms for mass communication, political ignorance that reflects the way of communication of
citizens and the high level of impunity, present a dangerous basis for a serious security risk in the Republic of North Macedonia not only for individuals and groups but also for the whole society.

Considering the above said, the research goal of this paper is to contribute to the explanation of the systemic problem that the impunity of hate speech in a public discourse can cause serious damage in terms of security if the publicly expressed hatred is tolerated by the competent institutions. The freedom of expression must be guaranteed as one of the fundamental human rights however long-term impunity of abuse of this right, especially by tolerating hate speech hence infringements of other human rights at the same time may trigger serious safety issues in one society or even broader, including hate crimes.

2. METHODOLOGY

The research methodology scopes three instruments:

1. A brief legal overview of the Criminal Code (Krivcen zakon, 2021) of the Republic of North Macedonia, more specifically of article 319 - Causing national, racial and religious hatred, discord and intolerance
2. A legal comment of all existing final court judgments of this article in the period from 2011 to 2021 in the country, and
3. Three expert opinions on the topic combined with other relevant literature.

For obtaining the data for this research (court judgments) a formal request based on the national Law on Access to Public Information (Comission for free access to public information, 2021) was send to all basic criminal courts in the Republic of North Macedonia (26 in total). The gathered data based on a query sent to all 26 basic courts in the country results in only five court judgments that are a subject of a qualitative and quantitative analysis.

An attempt is done through assessment of the judgments to summarize the nature of these crimes i.e., the manner in which they are usually done, the place and the kind of profile of individuals or groups who are involved, the length of the court procedure, the penal trend, etc.

In addition, three semi open questionnaires were drafted, and an interview was conducted with one journalist and two attorneys. The two attorneys have an extensive practice in court litigation of cases related to the freedom of expression and the speaker journalist is a prominent investigative reporter that had also experienced threats, because of their work in the last three years. The speakers are contributing to the main hypothesis of this article that impunity of excessive misuse of the freedom of expression is a potential safety risk for the society in a general point of view. The questions, five in total, were designed to invite the speakers to share their perception based on their practical experience, about the domestic legislation whether it is suitable to respond the local context about this topic. In addition, the questionnaire had the tendency to seek an opinion about the nature of the court practice when it comes to hate speech in the country and the importance of the balance in practicing the freedom of expression in satisfying the public interest without harming other human rights.
3. QUALITATIVE AND QUANTITATIVE ASSESSMENT

Can the restrictive approach of states, including the Republic of North Macedonia, contribute to problem solving in abuse of freedom of expression if they impose restrictions on freedom of expression? The answer is negative, except in cases where the abuse of one human right violates another human right and it is verifiable through the “Three – part - test (European Court for Human Rights (ECHR), 2021). In this test, the state or the judiciary should first examine whether the restriction is prescribed by law, secondly whether the restriction is aimed at achieving a legitimate goal, and thirdly whether it is “necessity in a democratic society”.

The harm of an ignorant approach by the competent institutions regarding the potential risks of misuse of the freedom of expression can be: 1. external - where neighbouring and other countries generally get the impression that for holding the power, the fundamental rights of citizens are not fully guaranteed and 2. internal, which reflects the (in)capacity of individuals in power or institutions to manage impunity, but also to be tolerant to public criticism in cases where critical voices are sanctioned and the abuse of the right to expression is used as an excuse. In this regard, for the purposes of this research, an attorney will say: It is a fact that in the domestic legislation there is no special (by this meaning on separate – lex specialis) law on hate speech as is the case in some EU member states but that does not mean that these crimes should be ignored. Essentially, acts related to hate speech can be interpreted based on the several articles of the Criminal Code, especially in Article 319. However, the problem is that for this act there is no clear obligation for the Basic Public Prosecutor's Office to act ex officio and is left to the plaintiff to file a private lawsuit. This is one of the reasons why there are incredibly small number of such court cases despite the apparent presence of hatred in the public discourse in our country. The tolerance of these most often verbal crimes is dangerous since it may trigger hate crimes with real violence”.

As one of the indicators that public hate speech is tolerated in the Republic of North Macedonia, as well as public threats that may endanger the safety of individuals and groups, is the poor court practice for these acts. For the purposes of this paper, 26 letters were sent under the Law on Access to Public Information with the question of how many final judgements there have been in the last 10 years under Article 319 - Causing hatred, discord or intolerance on national, racial, religious or any other discriminatory ground, from the Criminal Code. In addition, if there are such judgments, copies of the documents were requested to be submitted having in mind that court judgments older than five years are not available on the court webpages.

From the analysis of the received answers, it can be concluded that in ten years there have only been five final judgements (in addition to the one which is ongoing in front of the court in Delchevo) for this type of cases and none of these judgements is on the territory of the City of Skopje but in Krushevo, Bitola, Kumanovo and Struga. Within the deadline of 20 days, 24 answers were received out of 26 in total and two basic courts did not answer - the Basic Criminal Courts in Gostivar and Tetovo did not respect the legal obligation to provide an answer in the foreseen time.
3.1. A brief comment on five court judgements

Judgement No. 14/19 dated 15.10.2019

Criminal act - "Incitement to hatred, discord or intolerance on national, racial, religious and other discriminatory grounds" under Article 319, paragraph 1 of the Criminal Code. The Basic Court in Krushevo in the criminal case against five defendants for the crime passed a judgement based on confession. The court procedure was initiated upon an indictment of the Basic Public Prosecutor's Office in Prilep.

Within the enacting clause of the indictment / judgement, it was stated that on 02.08.2018, by exposing the ethnic symbols of the members of the Albanian ethnic community in the Republic of North Macedonia, it was caused hatred, discord and intolerance based on ethnicity, so that during the celebration on the occasion of the state holiday “August 2nd” which was attended by the President of the state, representatives of the Parliament and the Government, representatives of political parties, foreign countries, accredited diplomatic and consular missions and a large number of citizens, as part of the group consisting of members of several sport fan groups shouted: “Only dead Shiptar is a good Shiptar” and “a gas chamber for the Shiptars”.

All defendants were sentenced to an alternative measure - a suspended sentence after they confessed to having committed the crime at the first hearing and stated that they felt guilty.

Four of the defendants were sentenced to three months imprisonment each, which will not be executed unless they commit a new crime within one year, and one defendant was sentenced to four months imprisonment which will not be executed if he does not commit a new crime within one year.

Judgement No. 775/18 dated 27.03.2019

Two criminal offenses - Assault on an official while performing public security duties under Article 383 and inciting national, racial, and religious hatred, discord, and intolerance under Article 319 paragraph 1 of the Criminal Code.

In this case, the third Judgement is final and was rendered based on a confession.

1. The first judgement K-195/17 was passed by the Basic Court in Kumanovo on 26.04.2017, in a procedure initiated upon an indictment by the prosecutor’s office, by which the defendant was convicted of two criminal offenses with a single sentence of suspended sentence - imprisonment for a term of two years which will not be executed if the defendant does not commit a new crime within four years.
2. The Court of Appeals in Skopje with Judgement 790/17 from 04.10.2017 reversed the first-instance judgement, found the defendant guilty of the two crimes he was charged with and sentenced him to a single prison term of one year and two months.

3. On March 27, 2019 the Basic Court in Kumanovo in a repeated procedure upon an indictment against one accused for two criminal offenses, passed a Judgement K-775/18 based on a confession. The defendant was convicted for both criminal offenses, which are charged with a single suspended sentence - a prison sentence of one year and two months, which will not be committed if the defendant does not commit a new crime within four years.

The enacting clause of the indictment / judgement states that on 31.03.2017, around 4pm, a group including a child and several unknown persons damaged the state flag and it incited discord and intolerance on the basis of ethnicity. In addition, an official was attacked and inflicted bodily injuries while he was performing public security and protection of the constitutional order of the state. The defendant put down the state flag from the mast with the other people who were with him in the centre of the city in front of many citizens, dragging the rope to which the flag was attached, after which he tore it. When the police officer ran to arrest him, the defendant attacked the police officer and continued to hit him, causing bodily injuries. As more citizens witnessed the incident, a sense of discord and intolerance based on ethnicity flared up in the public. The defendant was detained and spent 30 days under house arrest.

At the main hearing of the repeated procedure, the defendant apologized to all present and to the entire Macedonian public and was with his head bowed all the time looking at the ground.

Table No. 2 - Judgement No. 775/18 dated 27.03.2019 from Basic Court Kumanovo

<table>
<thead>
<tr>
<th>Venue</th>
<th>Duration of the crime to final judgement</th>
<th>The crime was committed by:</th>
<th>Previous convictions?</th>
<th>Nationality</th>
<th>Legal representative?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kumanovo</td>
<td>Two years</td>
<td>group (condemned)</td>
<td>No</td>
<td>Albanian</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Judgement No. 84/19 from 04.04.2019

Criminal offense under Article 319 paragraph 1 of the Criminal Code. The Basic Court in Bitola, acting upon the indictment of the Basic Public Prosecutor's Office in Bitola against one defendant for a crime, at the main hearing in the defendant's substance had a judgement - an alternative measure of probation - a sentence of imprisonment of one year which will not be executed if the convict does not commit a new crime within two years. The enacting clause of the indictment / judgement states that the night between 11.04.2018 and 12.04.2018 in the village of Obednik, Demir Hisar, by damaging other people's properties i.e., at the wall of old shop owned by the witness T.P. cohabitant from the same village, spray-painted in Latin letters graffiti with text “Učk, Kosova, Adem Jashari po na thirret - Kosova” which caused hatred and anxiety based on ethnicity among Macedonians living in that village.
Table No. 3 - Judgement No. 84/19 from 04.04.2019 from Basic Court Bitola

<table>
<thead>
<tr>
<th>Venue</th>
<th>Duration of the crime to final judgement</th>
<th>The crime was committed by:</th>
<th>Previous convictions?</th>
<th>Nationality</th>
<th>Legal representative?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Obednik – Demir Hisar</td>
<td>One year</td>
<td>Individual</td>
<td>No</td>
<td>Albanian</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Judgement No. 93/19 dated 21.06.2012

Criminal offense under Article 319 paragraph 1 of the Criminal Code. The Basic Court in Struga, acting upon an indictment of the Basic Public Prosecutor's Office in Struga against one defendant for a crime, at the main hearing in the presence of the defendant, sentenced him to 5 months in prison.

The enacting clause of the indictment / judgement states that on 23.01.2012 in Struga in front of the Municipality building set fire to the state flag which he was carrying, and when the flag was already burned, he threw it on the ground and started applauding which caused national hatred among those present and other citizens.

Table No. 4 - Judgement No. 93/19 dated 21.06.2012 from Basic Court Struga

<table>
<thead>
<tr>
<th>Venue</th>
<th>Duration of the crime to final judgement</th>
<th>The crime was committed by:</th>
<th>Previous convictions?</th>
<th>Nationality</th>
<th>Legal representative?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Struga</td>
<td>Five months</td>
<td>Individual</td>
<td>Yes</td>
<td>Albanian</td>
<td>Yes</td>
</tr>
</tbody>
</table>


Criminal offense under Article 319 paragraph 1 of the Criminal Code. The Basic Court in Struga, acting upon an indictment of the Basic Public Prosecutor's Office in Struga against one defendant for the crime, at the main hearing in the presence of the defendant pronounced a judgement sentencing him to an alternative measure probation - imprisonment of one year which will not be executed if the convict does not commit a new crime within two years.

The enacting clause of the indictment / judgement states that during the inspection by a judge of the Basic Court in Struga, and in connection with a previous dispute between the church “St. Anastasia” and the building of the Municipality of Struga, there was a gathering of locals where at one point, one of the present shouted: “The village is Muslim and there are no Christians in it”, which caused religious hatred among some of the citizens present and they formed a group. Following a lawsuit filed by the on-duty judge at the event, which invoked Article 319 of the Criminal Code, the Court in Struga in 2016 ruled that the defendant who pronounced that sentence found him guilty and sentenced him to probation.

One of the arguments in the explanation is that in the village of Oktisi live citizens who are part of several religious communities and is of a multi-ethnic nature, and his statement hurt the feelings of some of the present, but also caused hatred from one ethnic group.
The mutual aspect of these five separate court judgements is the following:
The average time duration from the commission of the crime to the adoption of a final judgment is 17 months. The shortest time is 5 months, while the longest is 31 months. At first glance it seems long, but in the case No. 775/18 the perpetrator was charged and convicted of two crimes (concurrency of crimes), one of which is assault to an official while performing public security duties. Three court proceedings were conducted, three verdicts were brought, and the defendant spent 30 days under a house arrest. If the duration until the final verdict of this procedure is subtracted (which generally differs from the other four verdicts), the average time until the final judgement is reduced by 2 months, i.e., it is 15 months. This can be considered as a short duration of criminal proceedings in the Republic of North Macedonia.

Additionally, based on the assessment of the five final judgements:
- Out of the five crimes, three were committed in the city, while two were committed in rural areas;
- All final judgments have been proceeded by the basic criminal courts.
- All defendants were adults and had an attorney during the proceedings.
- All defendants have been convicted.
- In four verdicts, suspended sentence was imposed, while in one verdict a prison sentence of 5 months was imposed.
- In one case, the defendant spent time under a house arrest, but this is attributed to the attack on the official; In this case the defendant was sentenced to probation;
- Two crimes were committed in a group and both were judged based on confession, while three were committed individually.
- Four of the five crimes were committed in the presence of more than five witnesses, while one was committed without the presence of witnesses.
- Two of the nine defendants / convicts appeared in the criminal record as previously convicted.

Depending on the local context, a certain word, a phrase, or a sentence in public or even a gesture or a graffiti that may cause a hatred to a specific group, especially based on religious or ethnic ground in the local context in the society may inflict further civil tensions. In this regard, an attorney that represents individuals at court related to freedom of expression will stress out: “the freedom of expression is one of the fundamental rights, but this right is not absolute. This means that when the misuse of freedom of expression breaches another human right, this human right may be suspended by the court. Having said this, the objective penalization of the misuse of the freedom of expression is defending this principle of free speech and vice versa, the impunity encourages further cases of hate speech and possibly crimes based on hate, something that is not new in the context of Western Balkans.”
Nonetheless, the state must provide not only a favourable legal environment for exercising the freedom of speech and expression, but it should also constantly invest in the capacity of the competent institutions to secure this human right but also to protect individuals and groups by its abuse. In this regard, a journalist for the purpose of this paper will stress out: “Journalists are having the task to inform the public in objective way even when the information is not positive news, a trend that is, unfortunately, quite often in the era of pandemic. We do have examples when only because we have published negative news, myself and my colleagues were exposed to an aggressive speech and even hatred only because we have been doing our job as journalists and we have not received institutional support for this reason. This trend, in which we are targeted to verbal attacks only because of our profession, is creating a chilling effect that increases the self-censorship”.

Important to be noted is that the Criminal Code of RNM also defines Crime of hate that is defined as crime against a natural person or a legal entity and associated persons thereto or a property which is committed wholly or partially due to a real or speculative (imaginary, assumptive) characteristic or association of the person and relates to the race, skin color, nationality, ethnic origin, religion or conviction, mental or bodily disability, sex, gender identity, sexual orientation and political conviction (Criminal Code, 170/2017). Apart of the definition of the crime of hate, this law defines more serious penalties if specific crimes are being committed with hatred motives and later this is being qualified as such in the court proceeding.

4. CONCLUSION

The research shows that the case law for hate speech offenses is extremely modest given the number of court judgements in the last ten years across the country. According to the answers received from 26 basic criminal courts from the territory of the whole country, in the last ten years there have been only five final court judgements for hate speech (according to Article 319 of the Criminal Code) and none of it is on the territory of the City of Skopje. Also, none of the court judgments refers to hate speech towards journalists nor to published content via media or internet social networks.

In general, citizens should be aware that, according to Article 10 of the European Convention on Human Rights (Council of Europe), everyone has the right to freedom of expression. This right includes freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. More importantly, this right is not absolute, and when it jeopardizes other rights, especially the absolute, such as the right to life or the right to think, this right is subjected to certain restrictions.

In the Republic of North Macedonia, there is no special law on hate speech that would sanction the abuse of freedom of speech, which is a human right that has no absolute freedom under the European Convention on Human Rights and can be restricted in conditions where it threatens other human rights in accordance with the case law of the European Court of Human Rights.

Tolerating explicit hate speech in a local context can easily cause social tensions and thus potential conflicts primarily on religious and ethnic grounds but also on other grounds such as political or sexual affiliation.

In the creation of a preventive mechanism, systemic solutions which would imply legal changes of the Criminal Code and the Law on Criminal Procedure are needed, through which law enforcement institutions such as the Ministry of Interior, but also the Prosecutor’s
Office would have greater authority to prosecute such acts ex officio in a non-selective manner. If the abuse of speech is tolerated, especially in fragile democracies such as the Republic of North Macedonia, public order and peace can be easily disturbed and hate speech can turn into hate crimes.

Constant campaigns by the civil sector on the importance of freedom of speech and media literacy should be a common practice recognized and supported by the public authorities. There are positive examples where local civic organisations are conducting public campaigning actions (Helsinki Committee for Human Rights, 2016) and even European political organisations (Delegation of EU in Skopje, 2020) on grass root level but there are no visible examples of such public proactiveness by the governmental institutions.

Finally, freedom of speech should be nurtured, and its abuse must not be underestimated. In this regard, Adam Michnik, a well-known Polish publicist and essayist, will say “People kill first with words, and only afterwards with the sword”. With this thought he only reminds us of the meaning of public speech, but also warns that the abuse the power of free speech should be brought to justice.

5. REFERENCES

2. Comission for free access to public information (April 2021). Retrieved from http://komspi.mk/wp-content/uploads/2017/09/%D0%97%D0%90%D0%9A%D0%9E%D0%9D-%D0%97%D0%90-%D0%A1%D0%9F%D0%98-%D0%9F%D0%94-%D0%A4.pdf
4. Court Judgement, 14/19 (Krusevo 2019). Retrieved April 10, 2021, from http://sud.mk/wps/portal/central/sud/odluki/ut/p/z1/04_Sj9CPykssy0xPLMnMz0vMAfIjo8zizdxNTAwsvA183ANCzQ0cfV0MPEIsvYwsjMz0w_EpcDc3048iRr8BDuBoQJx - PAqi8Bsfrh9FSEkUPjeAvBgJdIM5QoG_hxtQQairoamjRaCRIyYu5fjDJmMzcgpzM5MwS3_yU1Bz9yJKi0IT9gtzQ0AiDLNOCdEVFAM09eA0!/p
5. Court Judgement, 775/18 (2019). Retrieved April 09, 2021, from http://sud.mk/wps/portal/central/sud/odluki/ut/p/z1/04_Sj9CPykssy0xPLMnMz0vMAfIjo8zizdxNTAwsvA183ANCzQ0cfV0MPEIsvYwsjMz0w_EpcDc3048iRr8BDuBoQJx - PAqi8Bsfrh9FSEkUPjeAvBgJdIM5QoG_hxtQQairoamjRaCRIyYu5fjDJmMzcgpzM5MwS3_yU1Bz9yJKi0IT9gtzQ0AiDLNOCdEVFAM09eA0!/p
6. Court Judgement, 84/19 (Bitola 2019). Retrieved April 08, 2021, from http://sud.mk/wps/portal/central/sud/odluki/ut/p/z1/04_Sj9CPykssy0xPLMnMz0vMAfIjo8zizdxNTAwsvA183ANCzQ0cfV0MPEIsvYwsjMz0w_EpcDc3048iRr8BDuBoQJx - PAqi8Bsfrh9FSEkUPjeAvBgJdIM5QoG_hxtQQairoamjRaCRIyYu5fjDJmMzcgpzM5MwS3_yU1Bz9yJKi0IT9gtzQ0AiDLNOCdEVFAM09eA0!/p
7. Krivicen Zakon, Sluzben vesnik na RM br. 55/2013 (Precisten tekst)
8. Zakon za izmena i dopolnuvanje na Krivicniot zakon, Sluzben vesnik na RM, br. 170/2017