Montenegro, a secular state? A discussion on the power of the Serbian Orthodox Church in Montenegro

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Abstract: This paper is concerned with explaining the reason for and how the Serbian Orthodox Church (SOC) managed to influence the perceptions of half of the population in Montenegro, thereby impacting the voting outcome of the 2020 parliamentary elections. The paper presents a historical overview of the political and religious situation in the country, focusing on the two main orthodox churches- the Serbian Orthodox Church and the Montenegrin Orthodox Church (MOC), as well as their relationships with the government of Montenegro and the president, Milo Đukanović specifically. The reason for the discussion between the SOC and the government was the passing of the law on the freedom of religion and legal property, article 52 to be exact. The paper also provides an insight into the agendas and rhetoric of both the SOC and MOC, as well as the Đukanović government. To address this issue properly, this paper combined various legal documents, such as the Constitution of Montenegro and the law of the freedom of religion and legal property issued in 2019, with various regional and global news outlets that reported on this heated argument between the two parties. The paper also provides an insight into the agendas and rhetoric of both the SOC and MOC, as well as the Đukanović government. Lastly, it serves as a study of the influence of religious institutions on democratic processes. The work concludes that the SOC in Montenegro still has a growing influence that has recently been exercised to impact their position and power through the shaping of public opinion.

Keywords: Church, democracy, elections, law, property, rhetoric

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1. Introduction

In the revolutionary and historic referendum of May 2006, 55.5% of the 484,718 voters in Montenegro voted for the independence of their state (Joannine, 2024). This separation from Serbia after twenty-six years of belonging to a confederation of mixed and merged identities marked the beginning of the creation of the modern Montenegrin nation. The country was declared a constitutional democracy adopting the roles of a secular state and keeping the nation-state symbols that were decided upon in 2004- the national flag, anthem and crest. One year after independence, the government of Montenegro officially announced the recognition of the Montenegrin language as well, thereby putting a stamp on the creation of a contemporary and reborn identity of the state and the people of Montenegro (Vlada republike Crne Gore, 2024).

The recognised autocephalous churches are divided into four categories, in accordance with the seniority of recognition: Ancient Patriarchies (Ecumenical Patriarchate of Constantinople, Greek Orthodox Church of Alexandria, Greek Orthodox Church of Antioch and Greek Orthodox Church of Jerusalem), Junior Patriarchies (Bulgarian Orthodox Church, Orthodox Church of Georgia, Serbian Orthodox Church, Russian Orthodox Church and Romanian Orthodox Church), Autocephalous Archbishoprics (Church of Cyprus, Church of Greece and Orthodox Church of Albania) and Autocephalous Metropolises (Polish Orthodox Church, Orthodox Church of Czech Lands and Slovakia, Orthodox Church in America and Orthodox Church of Ukraine). Visibly, the divisions are geographically and nationally based (Clark, 2009).

However, even though autocephalous churches hold the most power and influence due to their longevity in particular geographical locations (for instance the Russian Orthodox Church being accepted and followed in China and Japan and the Serbian Orthodox Church being followed in BiH, Croatia, Montenegro and Kosovo). In the previous century, there have been attempts to separate from the large autocephalous church and create new orthodox churches specifically for that state in question (Drljević, 2009). This phenomenon has recently been the most present in the Balkans, whereby the Macedonian Orthodox Church has been autonomously operating, having been separated from the Serbian Orthodox Church for nearly 60 years, however still lacks the status of autocephaly, even though it's slowly becoming more canonically recognised by the Orthodox Churches (Dawisha & Parrott, 1994). Moreover, this isn't the only example of a nation (allegedly) separating its religious identity and institution from the SOC. The most recent one is that of the MOC seeking independence and formation in 1993, established by Antonije Abramović, a former Serbian SOC monk. The independence was announced under the claim that it represented the restoration of the autocephalous Montenegrin Church (Sekulović, 2010). However, the history of the MOC has been an issue of great debate and polarisation in the orthodox community, as well as in the Montenegrin society, due to the severely different interpretations of the origins and nature of the church from its beginning, especially recently. To take a proper look into the issue and to understand it more closely, both perspectives are presented.

According to the official statements and stance of the MOC, the first time the autocephalous orthodox church of Montenegro was mentioned in any official document was in 1832 by Petar II Petrović Njegoš in a formal letter to Josif Rajačić, whereby he mentions the name of the Montenegrin Orthodox Church (Montenegrina, 2024). Its operations were active until the 1918 unification of Serbia and Montenegro by King Nicholas when the operations slowed down and were finally terminated with the creation of the Kingdom of Serbs, Croats and Slovenes and 1920 of merging the autocephalous MOC into the SOC by the royal decree of regent Aleksandar Karađorđević. In 1993, Abramović announced the restoration of the church and formed the MOC, as it is known presently. After his death, Mihailo became the new head of the MOC (European Commission for Democracy Through Law, 2019).

However, the other side of the coin of the history of the MOC stands from the SOC, as well as the wider orthodox community. As was expected after the declaration of independence in 1993, this newly independent church in Montenegro was met with an array of backlash and harsh criticism from the SOC, especially since Montenegro was still a part of the confederation of Yugoslavia, and later Serbia and Montenegro (Sekulović, 2010). The SOC in Montenegro (official name: Metropolis of Crnogorsko-Primorska County and the eparchy of Budimljansko-Nikšićka County) had been operating as the main religious institution and body and the creation of a potential rival claiming legitimacy seemed blasphemous. They had thus far been the only recognised autocephalous body, representing the regional junior patriarchy, existing since 1219 and therefore having the authority to decide upon important religious matters (World Council of Churches, n.d.). In Montenegro, their status was the same as in Bosnia and Herzegovina, for instance. The SOC had been the only existing orthodox body recognised by both the Eastern Orthodox Churches and the believers (Davidović, 1998).

The reasons why the SOC, as well as the majority of the wide Orthodox community, were so strictly against the proclamation of independence and had announced publicly that the MOC was nothing other than an aspiring organisation, rather than any sort of recognised church, was their point of view on the history of the alleged Autocephalous Church of Montenegro (Radio Slobodna Evropa, 2019). According to this tide of thought, the merge of the churches instructed by regent Karađorđević in 1918 had the full support of the people as well as the orthodox community to incorporate the autocephalous Montenegrin Orthodox

Church into the SOC because it represented the reconstruction of Pećka Patrijaršija, named originally Srpska Patrijaršija (Radio Slobodna Evropa, 2020), (Radio Slobodna Evropa, 2019). The history of Pećka Patrijašija has not been under debate and it is claimed that although the exact date of its establishment is unknown, it is believed to date from 1219, firstly as an archbishopric and then in 1345 when it gained the title of patriarchy (Bogdanović, 1986). It is considered to be the first eparchy of the SOC. In 1459, Pećka Patrijaršija ceased to exist as it merged with the Orthodox Ohrid Archbishopric, after which it was renewed in 1577, when its borders were widened to include new areas in Bosnia and Herzegovina, Dalmatia, Croatia, Hungary and Slavonia, as the territory had at this point been under the Ottoman empire, allowing Pećka Patrijašija to increase its magnitude (ćorović, 2001). However, as an outcome of the Ottoman-Austrian wars, in 1766, this institution was terminated and right after its termination the Cetinje Metropolis was created in Montenegro, known today as the Metropolis of the Crnogorsko-primorska county (one of the eparchies of the SOC), occurring in 1918 with the Karadordević decree (Tomanović, 2001).

The local Serbian authorities, primarily President Slobodan Milošević, followed the rhetoric of the SOC, harshly criticising the blasphemy, however, the Montenegrin authorities remained silent. The most prominent political actor in Montenegro at the time of the MOC creation was Milo Đukanović who had been the Prime Minister under the president of Yugoslavia, Slobodan Milošević. Đukanović had remained rather silent about the Montenegrin identity within the borders of Yugoslavia, right until the Yugoslav dissolution and the end of the bloody war in Bosnia and Herzegovina, which ended with the Dayton Peace Accords in 1995 (Tromp, 2017); (Marović, 2020). After having publicly criticised Milošević and his political leadership, the two parted ways and commenced with different policies, Đukanović's being that of proposing the independence of Montenegro an independent state for an independent nation. This proposal was met with harsh critiques, however, in vain. Montenegro declared independence through a referendum in 2006, and ever since the nation-building process in Montenegro has been strengthening and increasing, through first the constitution, flag, language and soon enough, religion (Tomović, 2018).

The physical and political separation from Serbia, followed by the creation of their national symbols indicated the need for the separation in national identity, tradition and language, but not necessarily religion. The dominant religion in Serbia and Montenegro throughout the prior century had been Christian Orthodoxy and the main religious institution within it was the SOC (Mappes-Niediek, 2020). After the Montenegrin independence and the creation of their national symbols, alongside the embracing of the Montenegrin culture and tradition, the religious aspect, however, did neither separate nor lose its integrity. The hegemony of the

SOC was transferred through the newly established borders and the SOC became the dominant religious institution in the independent State of Montenegro (Vlada republike Crne Gore, n.d.).

However, this isn't to say that the SOC was the only orthodox institution that was active in Montenegro, even before its independence. The date of the establishment of the MOC, to this day, represents a mystery and dispute that causes various issues for the State and the believers. On one hand, there are claims that the MOC has existed ever since the end of the First World War and on the other hand it is said that it was founded in the late 90s, of the 20th Century (Pinter, n.d.). This mystery not only influenced and impacted the religious community and historical scholars in Montenegro, but ever since 2019, it has immensely contributed to the political sphere. The influence of the Churches in Montenegro has over the years proven to be quite strong, as the country's leader Milo Đukanović had a very open and transparent relationship with the religious institutions and authorities. However, the nature and essence of these relationships differed tremendously (BBC News, 2019).

Former President, Milo Đukanović, has been quite an important politician in Montenegro, serving as both the President for two terms, one of which is current and Prime Minister for four terms, over the past two decades. He is also the president of the prominent Democratic Party of Socialists in Montenegro. His party's reign ended in 2020, with a defeat in the parliamentary elections, for the first time since Montenegrin's independence (Pejić, 2008). His relationship with the Churches in Montenegro is, as aforementioned, of a rather dual nature. Over the years, Đukanović did not have a particularly strong and amiable relationship with either the Serbian Government or the SOC. This relationship did not however put in question the actions of neither side the political sphere operated secularly and the religious sphere operated without the interference of the Đukanović Government. His agenda and public political discourse almost always included an emphasis on the Montenegrin national identity and their independence (BBC News, 2019).

In correspondence with this rhetoric, his relationship with the MOC differed quite largely from that with the SOC. Đukanović has been a public supporter of the MOC and their operations, which was rather uncanny due to the fact that the MOC and its autonomy and independence were yet to be properly recognised by the High Orthodox Institutions¹ under the Orthodox laws (Arbutina, 2020). Moreover, this lenience towards the MOC was never so blatant as in 2019, when the Montenegro government passed a law on religious freedoms, legitimacy and legality of the Church properties, thereby allowing for greater autonomy of the MOC and relieving the SOC of religious properties that would fall into the ownership of the

The concept of autokefalnost

state, causing outrage from the SOC, its followers and even the Serbian government. This event occurred several months before the parliamentary elections in Montenegro and represented a sharp turn in the rule over Montenegro. It is believed that this sway was heavily influenced by the abovementioned law and the backlash of the SOC (Radio Free Europe, 2020).

This paper aims to explain the reason and how had the SOC influenced public opinion regarding the upcoming parliamentary elections, by challenging and criticising the current government for illegitimately undermining the importance of the SOC and its followers, thus splitting civil society into those in favour of the SOC and those against its hegemony.

The posed research question is answered by utilising and analysing legal documents, including the Montenegrin constitution and the 2019 law on the freedom of religion, as well as news articles from local and regional news portals and the election results and analytics. This paper's relevance lies in the fact that the topic is very current and hasn't yet been discussed in great detail. The correlation between democracy and the Church is a global phenomenon that is being observed- and it is being witnessed currently in Montenegro. However, the applicability of this research cannot go beyond this particular case due to differences like the conflict between the State and the Church. The paper does not cover the legality of both the Churches' claims on their property or the legitimacy of their rule due to the technical limitations of this paper.

The paper presents the public's reaction to the religious law passed in 2019 and revoked in 2020, focusing particularly on Article 52, followed by the SOC's and MOC's reaction and narrative before and during the election campaign period. Furthermore, the very relationships that both Churches have with the government that is in power at the moment are to be explained, followed by the impact the Church's narratives on the people of Montenegro are also the inspiration for protests against the law and the change in leadership. The paper lastly presents the election results and the effect of the results regarding the above-mentioned article on religious freedoms and legal ownership, as well as the overall status of the Churches in 2021.

2. The Legal Dispute Between the Church and State

Article 14 of the Montenegro Constitution states that — The separation of the religious communities from the State, indicates very clearly that all the religious communities and institutions are to operate freely and with equal status, whilst being separate from the State: "Religious communities shall be separated from the state. Religious communities shall be equal and free in the exercise of religious rites and religious affairs" (Constitution of Montenegro, 2007).

Under this context, the Government of Montenegro has every right to separate its operations from the interests of the Church, regardless of whether it is the SOC or MOC. However, this does not necessarily entail that the government has to conduct all its businesses without considering how they would affect the religious institutions, especially because the majority of the population in Montenegro declares themselves as religious in particular as members of the SOC and a smaller portion as members of the MOC (Ambasada SAD, 2011). Furthermore, this in essence means that the Montenegrin Government and the decision-making bodies quite often have to consider the potential backlashes and consequences of making decisions that leave the Church(es) worse off. Although completely legal, some decisions might be considered illegitimate due to the lack of public support and perception of the validity of particular decisions (Al Jazeera, 2019).

The most recent example of such a move made by the Government of Montenegro was the introduction of the newest religion-related law that would allow for more freedom amongst religious institutions, thereby dispersing the structural and essential hegemony of the SOC, and also elevating the secularism of the Montenegrin State by allowing it to furthermore transfer the ownership of particular lands and monasteries from the SOC on to the state itself (Radio Slobodna Evropa, 2020). The law was introduced in December 2019, approved by the parliament and signed by the current president Milo Đukanović in January 2020 (BBC News, 2019). The law on the freedom of religion and belief and the legal status of religious communities was initially sent to the European Commission for Democracy Through Law in Venice in 2015 but was returned and disapproved due to a large number of illegalities and unclear claims (European Commission for Democracy Through Law, 2019). In 2019, the renewed law was sent and approved. The entire law consists of 55 Articles, however, the one that received the most criticism and created a year-long battle between religious and political groups in Montenegro was Article 52 which stated the following:

Religious objects and land that are used by religious communities on the territory of Montenegro, that have been proven to have been built, or received from public state funds, or were in the ownership of the state until 1 December 1918, as the cultural heritage of Montenegro are state property. Religious objects for which it is determined that had been built on the territory of Montenegro with joined investments of the citizens until 1 December 1918 are state property (Ministarstvo za ljudska I manjinska prava, 2015).

In essence, this article makes the statement that all religious monuments, objects, or any other types of institutions that do not have proof of legal existence and ownership before 1918 are to be claimed by the State of Montenegro. Needless to say, this article brought about immense polarisation in the opinions of both the Churches in the country and the neighbouring states, but also amongst the people. The primary polarisation occurred between the SOC and the MOC and their attitudes towards the aforementioned article (Maksimović, 2020).

The SOC's reaction was quite negative, as can be imagined, as the signing of this law with this article remaining as such would immensely impact their importance as a religious hegemon, as well as an important political asset. Although they did not put into question their ownership over the SOC monasteries and objects, they did however harshly criticise the government for such an outrageous attack towards the Church (Radio Slobodna Evropa, 2020). The very legal documentation necessary for the proof of ownership exceeds the scope of this paper, so the focus shall remain on the Church's rhetoric and agenda against the Montenegrin Government decision.

2.1 Reaction and Action of the Serbian and Montenegrin Orthodox Church

After the law on religious freedom was passed, it did not take long for the SOC to react with harsh criticism and commence a public debate. The SOC and the former Patriarch of SOC, Irinej, delivered a public complaint about the article on property rights. Although it did neither deny nor accept the assumptions that the SOC does not have the legal proof necessary to keep their land and monasteries, the SOC proclaimed the law as discriminatory and as an open attack on the Church and all Serbians living in Montenegro (Kajosević, 2020). One of the holiest monasteries of the SOC, Ostrog, was under scrutiny regarding the legality of its ownership. The SOC's followers and the Church itself were extremely concerned about the possibility of losing one of the most important monuments and symbols of Serbian Orthodoxy (Janković, 2019). This panic and concern created even more incentive to label the Government as "anti-Serbian". Consequently, the Church started a series of protests throughout the country to counter the government and speak out about the alleged illegitimacy of their claims over Church property. The protests were massively joined by the SOC followers and the situation largely escalated, as these protests received support from the Serbian Government (Al Jazeera, 2019).

On the other hand, the Patriarch of the MOC, Mihailo, had the opposite reaction and quite a short and direct statement. He claimed that the Montenegrin Government was not whatsoever taking away anyone's property, but was rather simply taking back what has always been rightfully theirs (Radio Slobodna Evropa, 2020). This statement also managed to consolidate the actions of the SOC, strengthening their rhetoric that was focused primarily on the anti-Serbian context and the desire to undermine the SOC and repress the Serbian population in Montenegro, thereby

strengthening the "false" MOC. The SOC never approved of the open operations and existence of MOC, considering it to be more a cult than a valid Orthodox community (Aljović, 2020).

To further increase the complexity of this issue, parliamentary elections were approaching, and the election campaigns were armed with one question-does the Government have the right to claim the SOC's property?

3. The Parliamentary Election Campaign

According to the *Deutsche Welle*, the 2020 elections in Montenegro were to represent the most uncertain and potentially dangerous elections the country has ever seen (Kračković, 2020). After over two decades of semi-authoritarian rule in Montenegro, as Florian Bieber classifies it, there was a chance for a turnover, a chance that was practically allowed by the DPS² lead Government itself after the signing of the controversial law (Bieber, 2017); (Radio Free Europe, 2019). With the support and incentive of the SOC, the Milo Đukanovič Government's opposition finally stood a chance at overthrowing them.

The influence of the Church in any political process in Montenegro was never more blatant and powerful. After the law was passed, the SOC began their protests and anti-governmental agenda, heavily influencing the views of the Church's followers concerning whom to vote for in the upcoming elections (Tomović, 2020). Similarly, the MOC had its agenda regarding these elections and their take on the reasoning behind the passed law. The MOC in contrast to the SOC, was a strong supporter of the property clause, as well as of the government that signed it (N1, 2014). The relationship between the Đukanović Government and the Montenegrin Orthodox Church became even more visible during the pre-election period.

3.1. The Montenegrin Orthodox Church and Milo Đukanović

Đukanović's infamous reputation as a European-oriented reformist after the secession of Montenegro from Serbia and Montenegro did not have a long-lasting life. Not long after the consolidation of his power in Montenegro, his policies and general political discourse and agenda heavily shifted towards a more Montenegro-oriented national identity building, that included the official language being separated from that of Serbia and similarly, the Orthodox Church being separate from Serbia (International Institute for Middle East and Balkan Studies, 2020). This meant the exclusion of the SOC's prevalence in the country and the strengthening of the church that would support his agenda and goals in Montenegro- the MOC.

Democratic Party of Socialists in Montenegro

The entire law on the freedom of religion and legal ownership was suited well for the MOC. It consisted of not just articles that would increase its legitimacy as an Orthodox Church, but also of the Articles (precisely Article 52) which would help it gain a more equal status of power in the country, as the power of the SOC financially, legally and ownership wise, would decline drastically (Al Jazeera, 2020). The support of the MOC for this law was quite transparent and so was their support for DPS in the Parliamentary Elections of 2020. As aforementioned, Đukanović although having led the country rather semi-autocratically, still wished to preserve external legitimacy as a western-lead politician (Bieber, 2017). The legitimacy of the MOC was denied by the Vaselian patriarch Bartolomeo, emphasising that the only Orthodox Church in Montenegro is the SOC. However, there is another option for the legitimisation of the MOC. The Vatican did not deny the possibility of the creation of the Uniat MOC. This would mean that a canon recognition of the MOC would give it legitimacy as an Eastern Orthodox church, but the official canon jurisdiction over the Church would be in the hands of the Roman Catholic Church of the Vatican as is the case of the Uniat Greek Church (International Institute for Middle East and Balkan Studies, 2020).

This option would allow both parties MOC and Đukanović to achieve their goals. The MOC would become legitimate and recognised under the Holy Law and Đukanović would strengthen his ties to the West even more. However, his ties to the East, most notably Russia and Serbia were not neglected either. During his election campaign, Đukanović promised to slightly alter the law in the favour of the SOC if his party won the elections, to appease the Serbian Government, as well as the Serbian people in Montenegro. Unfortunately for him, the latter discourse strategy did not quite work (Radio Free Europe, 2020).

3.2 The Serbian Orthodox Church Versus Milo Đukanovič

Contrary to the relationship that the MOC has with the President, the SOC has always had a rather thin and distant relationship with Đukanović. As his discourse and actions are quite usually pro-Montenegrin identity and the creation of a fully national identity in every sphere, it was natural for the two to have differing points of view (International Institute for Middle East and Balkan Studies, 2020). However, until this particular law, their relationship was more or less stable. After it was approved by the Parliament and signed by Đukanović, the tensions emerged ever so evident and what were once merely different stances, now became tools that would polarise the nation like never before and would result in what many would refer to as the end of Đukanović and his idea of a Montenegrin national identity embedded in all spheres of society (Maksimović,2020).

By claiming the property of the SOC to the state, SOC would immensely lose its influence in Montenegro, and with that alone the idea of MOC

being more present and existing on a relatively equal playing field would allow for the State to have more control, thereby pushing out what might be the last standing Serbian mark in the identity of Montenegro (Radio Slobodna Evopa, 2020). The SOC was perfectly aware of this, as was the Serbian Government and a counterattack was necessary to protect their power and influence in the country. As abovementioned, the SOC started protests as a sign of opposition and criticism. However, it did not end there. The Church did not hesitate to publicly speak out about the alleged injustice that was being handled to the Serbian believers in Montenegro and the people joined in (Sinanović, 2020).

With each day, more and more turmoil was created and the predictions for the upcoming elections started to shift towards the opposition of Dukanović. The SOC with the support of the Serbian Government persuaded its audience and followers of the bad intentions of DPS and their aim to minimise the power of the Serbian people in Montenegro which is nearly 30% of the population according to the census of 2011 (Statistics Office of Montenegro, 2011). In addition, around 72% of the population in Montenegro declares themselves as Orthodox and almost 90% of those Orthodox believers belong to the SOC, so the SOC was gaining a lot of support in numbers (European Parliament, 2020); (Ambasada SAD, 2011).

By the time of the pre-election silence, the people were extremely polarised and the DPS Government was more than aware of the fact that there was a large chance of losing the elections because of the Church, which inevitably happened.

3.3. Final Outcome

As was predicted, the electoral race was an extremely polarised and tight battle between the believers in the Đukanović cause and those opposed to it. In other words, it was a battle between the SOC and the twenty years long autocracy (Martinović, 2013). The elections took place on 30th August and out of 622,000 registered citizens over 410,000 citizens voted, according to the 2019 census (Državna izborna komisija Crne Gore, 2020). It is crucial to note that out of these 410,000, several thousand votes came from the neighbouring countries. There have been several incidents of voting manipulation since the country closed its borders for tourists due to the worsened epidemiological situation in the country and opened them solely for those eligible to vote. However, there were reports of border riots, fuelled by the words of the Church, whereby members of one or the other voter side were prohibited from entering the country (Kajošević, 2020). Although these accusations weren't considered official voting manipulation, it isn't to say that there were attempts to prevent particular votes from being cast, all influenced by a non-political (at least theoretically) actor. The final results were split with a bit over 35% for the ruling DPS, and nearly 33% for the "For the Future of Montenegro" opposition party. The ruling power depended on a final coalition, that was in the end taken by the opposition, ending the parliamentary prevalence of DPS (Državna izbrna komisija Crne Gore, 2020).

This moment marked the win of the SOC by default, which was proven a few months after the new Parliamentary Assembly, which decided to adjust the religion law's controversial Articles (Tomović, 2020). The Article on the ownership question was completely taken out, therefore allowing the SOC to keep all its property without being questioned (Kajošević, 2020). However, before the law was made official after the amendment, it needed to be signed by the President, which as can be imagined, took quite the bargaining (Radio Free Europe, 2021). Once it was signed, it represented the final defeat of the DPS rule and the idea of strengthening and legitimising the MOC through Government action, so one could claim that the current situation of the Churches in Montenegro is as it was before December 2019 (AP News, 2020).

4. Conclusion

In conclusion, the influence and power of the SOC have never been more prominent and have never been exercised to the extent of impacting the democratic political processes in the country. After the passing of a highly controversial law on religious freedoms, the Government received a backlash, both from the citizens of Montenegro and from the SOC. The SOC claimed that Article 52 of the said law was discriminatory, illegitimate and an open attack on the SOC, as it would allow the Government to take away the Church's property if they were unable to provide legal proof of their ownership over that property before 1918. In contrast to the SOC, the MOC supported the law and the mentioned Article, as it would help establish more legitimacy in the Orthodox community. Moreover, the reaction of the SOC contributed immensely to the opinions of the public that was soon to elect a new parliament in the upcoming elections.

Almost half of the voting body in Montenegro belonged to the SOC. Their perceptions and voting behaviour were heavily influenced by the rhetoric of the Church, as they proclaimed that the Government was trying to undermine the importance and operations of the Serbians in the country. The elections resulted in the favour of the opposition (the SOC supporters), after which the law was adjusted in the favour of the SOC, removing the discussed article. However, it must be noted that the grand switch in electoral power and the voting tides were not solely influenced by religious issues and rhetoric. General dissatisfaction, year-long frustration, economic issues and many other reasons have contributed to this change, but this is not to undermine the influence religious institutions have in countries whose leaders primarily rely on religious nation-building. These elections, ultimately, represent the turning point in the Montenegrin Government, as well as an interesting case of how even in secular states, the Church still plays a vital role in decision-making.

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