



STATE AUDIT
OFFICE OF HUNGARY

DR. LÁSZLÓ WINDISCH
PRESIDENT

Our ref.: NF-1211-002/2022
Budapest, November 4, 2022

Ms Deborah Brown

Senior researcher and advocate
Technology and human rights
Human Rights Watch

New York

Dear Ms Brown,

With reference to your letter as of October 26, 2022 on the audit of the 2022 parliamentary elections, I would like to inform you of the following.

The State Audit Office of Hungary (SAO) has started the statutory audit of the use of funds spent on campaign expenses for the 2022 parliamentary elections. In accordance with the legal provisions, the SAO will audit the use of budgetary support for nominating parties, the compliance with limitations relevant to expenses and the financing bans relevant to parties, as well as the use of support waived by individual candidates in favour of their nominating party within one year of the elections. The audit covers candidate parties that have obtained representation in parliamentary elections and those that have obtained at least 1% of the total valid votes cast on party lists.

In accordance with the statutory provisions, the State Audit Office of Hungary shall prepare a public report on the audit, which shall contain the facts found, the findings and the conclusions based on them. The report will be made available on the website of the State Audit Office of Hungary (www.asz.hu).

In response to your question on online political activities, I would like to inform you that the analysis you referred to, entitled "The legal environment for political advertising in the election campaign period on specific media platforms" was published in June 2020. The analysis states that political advertising content on social media is a campaign tool not specified in the Act on Electoral Procedure, which is capable of influencing or attempting to influence the will of voters and therefore its use during the campaign period is also considered campaign activity. In view of the

above, contrary to what is stated in your question candidates and nominating parties participating in parliamentary elections have an even higher responsibility to account for political advertising content on social media, therefore the provisions relevant to campaign activity of the Act on Electoral Procedure also apply to content published on social media platforms during the campaign period.

With regard to the findings of the final report of the OSCE Office for Democratic Institutions and Human Rights Election Mission, I would like to inform you that the State Audit Office of Hungary has fully complied and will continue to comply with its statutory audit obligations regarding the audit of election campaign expenditures. In carrying out its audits, the State Audit Office of Hungary acts in accordance with the law, the audit programme, the professional rules and methods of auditing and ethical standards.

Yours Sincerely,



dr. László Windisch
President