

THE UNBEARABLE BURDEN OF BEING UNDER COMMUNISM—THE CZECH EXPERIENCE

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INTRODUCTION

Czechoslovakia's communist era was portrayed by Milan Kundera's 1984 novel, *The Unbearable Lightness of Being* (Czech: *Nesnesitelná lehkost bytí*). The novel evolved into a memorable 1988 film set in Prague during the late 1960s and early 1970s, which captured the Czech society as it was. The film portrays the Prague Spring, the Soviet Union's invasion of Czechoslovakia along with its aftermath, told through the lens of two pairs of individuals and their communities. In what I will call the "Unbearable Burden of Being Under Communism," we turn back to formation following the first World War, Nazi occupation, the communist takeover, and finally to the Velvet Revolution.

I. THE CZECHOSLOVAK REPUBLIC'S TWENTY-YEAR GENESIS

First, in 1918, the Czechoslovak Republic established itself as a landlocked country in Central Europe, declaring its independence from Austria-Hungary.¹ During this time, the Catholic Church maintained influence in civil society, and religious freedom was constitutionally protected, but secularism was beginning to rise. Czechoslovakia's short-lived independence ended after the Munich Agreement in 1938, when the Sudetenland region was annexed by Nazi Germany.² Subsequently, Slovakia lost further territories to Hungary and Poland, including southern Slovakia, with a predominantly Hungarian population, and Zaolzie, with a predominantly Polish population.³

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1. Ferdinand Bada, *When Did Czechoslovakia Split Up?*, WORLDATLAS (Aug. 15, 2018), [https://www.worldatlas.com/articles/when-did-czechoslovakia-split.html#:~:text=Czechoslovakia%20was%20a%20sovereign%20nation,%E2%80%931938\)%2C%20and%20others](https://www.worldatlas.com/articles/when-did-czechoslovakia-split.html#:~:text=Czechoslovakia%20was%20a%20sovereign%20nation,%E2%80%931938)%2C%20and%20others) (on file with the Ave Maria Law Review).

2. Sean Scanlon, *Appeasement and 'Peace for Our Time'*, THE NAT'L WWII MUSEUM (Oct. 15, 2024), <https://www.nationalww2museum.org/war/articles/appeasement-and-peace-our-time> (on file with the Ave Maria Law Review).

3. *Id.*

Hitler threatened war over the issue of the Sudetenland. From September 29–30, 1938, the British, Italian, French, and German leaders met in Munich to discuss the issue.⁴ The Allies agreed to concede the Sudetenland to Germany in exchange for a pledge of peace. This agreement was known as the Munich Pact.⁵

II. WORLD WAR II AND NAZI OCCUPATION

Following the Munich Pact, between 1939 and 1945, Slovakia proclaimed its independence, and Hungary acquired Carpathian Ruthenia.⁶ In addition, the German Protectorate, consisting of Bohemia and Moravia, was established into the remaining Czech land. In 1939, following the beginning of the war, former Czechoslovak President Edvard Beneš formed a government and requested recognition from the Allied powers.⁷ Under Nazi occupation, Czechoslovakia, particularly the Jewish population, endured harsh religious oppression, including systematic persecution, forced deportation to concentration camps, and ultimately, mass murder as part of the Holocaust. In areas like Bohemia and Moravia, Jews were stripped of their humanity, being forced to wear the Star of David, and sent to camps like Theresienstadt.⁸ The Catholic Church also suffered from the Nazi regime with priests being arrested and sent to concentration camps.⁹

III. ÚNOROVÝ PŘEVRAŤ ROKU 1948

In March 1939, as German tanks pushed into Prague, “thousands of Ukrainians, Jews, and Czechs living in Czechoslovakia were” forced to flee “east toward the Soviet Union.” Roughly 8,000 refugees successfully crossed the Soviet border; however, their escape proved fruitless. The Soviets

4. *Id.*

5. *Id.*

6. Frank Jacobs, *Carpatho-Ukraine, Independent For Only 24 Hours*, BIGTHINK (July 23, 2010), <https://bigthink.com/strange-maps/57-carpatho-ukraine-independent-for-only-24-hours/> (on file with the Ave Maria Law Review).

7. See Vojtech Mastny, *The Czechoslovak Government-in-Exile During World War II*, 27 JAHRBÜCHER FÜR GESCHICHTE OSTEUROPAS 548, 550, 552 (1979) (Ger.).

8. *The Holocaust in Bohemia and Moravia*, U.S. HOLOCAUST MEM’L MUSEUM: HOLOCAUST ENCYCLOPEDIA, <https://encyclopedia.ushmm.org/content/en/article/the-holocaust-in-bohemia-and-moravia> (last visited Oct. 18, 2025) (on file with the Ave Maria Law Review).

9. See, e.g., Robin Gomes, “No one has greater love than this . . .” —St. Maximilian Kolbe, VATICAN NEWS (Aug. 14, 2018, 11:46), <https://www.vaticannews.va/en/church/news/2018-08/maximilian-kolbe-martyr-auschwitz.html> (on file with the Ave Maria Law Review).

collected most of the refugees and sent them to forced labor in their network of gulag camps throughout the Union of Soviet Socialist Republics (U.S.S.R.).¹⁰ At a minimum, three to five years of arduous labor was the typical sentence for unauthorized border crossing, while others faced additional, severe fabricated charges.

In the early 1940s, Czechoslovak citizens—thousands of them, many Ukrainians, Jews, and Czechs—fled Nazi-occupied Czechoslovakia and entered Soviet Union territory hoping to find safety.¹¹ As a result, around 8,000 of them were arrested and subjected to brutal gulag labor camps.¹² The grossly fabricated charges would read, “illegal border crossing.”¹³ Forced labor camps were established in Czechoslovakia from the time of Soviet Occupation as a means of punishment and “correction,” notwithstanding the absence of any court adjudication of guilt for any actionable offense.¹⁴ Categories of those incarcerated included “incorrigible offenders of people’s democratic regimes” and “ordinary criminals, who [could] not be corrected by . . . forced labor.”¹⁵ As an ulterior motive, when all the war prisoners were released in 1949, the remaining forced labor camps were situated in the Jáchymov-Karlovy Vary-Mariánské Lázně region. This region possessed vast deposits of uranium for the Soviet nuclear program that needed mining, given the insufficient number of German and Slovak miners who had settled in the area.

Only recently, with the help of new technology and extensive research, have these hidden stories begun to emerge from the Soviet archives. Recently, the Czech Institute for the Study of Totalitarian Regimes (USTR) released Soviet secret police files on around 1,000 prisoners.¹⁶ The release coincided with the 80th anniversary of the 1942 Soviet “amnesty,” which freed many Czechoslovakian prisoners to fight against the Nazis. While some survived, many “died in battle.” Czech historian Adam Hradilek played a key role in the release, beginning interviews with survivors in 2006.¹⁷ Following Ukraine’s Maidan Revolution, Hradilek gained unprecedented access to formerly closed

10. Amos Chapple, *In Photos: Secret Czechoslovak Gulag Files Released*, RADIO FREE EUR. RADIO LIBERTY (Jan. 13, 2022, 05:10 CET), <https://www.rferl.org/a/czechoslovak-gulag-secret-files-released/31651006.html> (on file with the Ave Maria Law Review).

11. *Id.*

12. *Id.*

13. *Id.*

14. See CENT. INTEL. AGENCY, *Czechoslovakia: Forced Labor Camps*, CIA-RDP80-00926A004500040003-7, CIA READING ROOM, <https://www.cia.gov/readingroom/docs/CIA-RDP80-00926A004500040003-7.pdf> (on file with the Ave Maria Law Review).

15. *Id.*

16. Chapple, *supra* note 10.

17. *Id.*

Komitet Gosudarstvennoy Bezopasnosti (KGB) archives in Kyiv. In the near future, thousands of secret police files documenting the lives—and often tragic ends—of Czechoslovakian gulag prisoners are expected to be published online, breaking open the horrors of 20th-century totalitarianism.¹⁸

During the 1944–1945 period, approximately 120,000 Soviet soldiers died during the liberation of Czechoslovakia from German rule.¹⁹ While Czechoslovakia was formally “liberated” from German occupation in late 1938, its pre-war borders were not fully restored. In July 1945, the Soviet Union orchestrated the cession of Carpathian Ruthenia to the U.S.S.R.²⁰ Western Czechoslovakia was divided by a military frontier separating the Soviet Army from the United States Army. Despite both armies departing Czechoslovakia by the end of 1945, Joseph Stalin achieved his objective of establishing a robust Soviet military presence in Prague during the German surrender in Czechoslovakia. Post-war communist influence in the Czechoslovak Army and government escalated. Czech soldiers who fought with Western Allies were marginalized, leading to the country’s transformation into a Soviet satellite state in 1948 through a communist coup. Czechoslovakia was governed by the Communist Party of Czechoslovakia (KSC) from 1948 to 1989.

The events leading to Czechoslovakia’s transformation began with the wake of a *coup d’état* in February 1948, when the Communists seized power in Czechoslovakia.²¹ Capitalizing on the post-war optimism of the people, the Communist Party gained public support while slowly tightening its grip on the state. The Communists resorted to violence, notably suppressing armed trade union demonstrations and other opposition forces.²² The Soviet Union provided support to the Communists by deploying advisors and positioning

18. *Id.*

19. Prokop Tomek, *Life with Soviet Troops in Czechoslovakia And After Their Withdrawal*, 70 MIL. HIST. INST. 97, 99 (2017) (Czech Republic), <https://www.folklore.ee/folklore/vol70/tomek.pdf> (on file with the Ave Maria Law Review).

20. Denisa Nešťáková, *The “Glory” of Liberation*, COPENICO (Aug. 5, 2025), <https://www.copenico.eu/en/articles/glory-liberation-sexual-violence-perpetrated-red-army-slovakia-end-world-war-ii> (on file with the Ave Maria Law Review).

21. Office of the Historian, *Interest in the United States in the cession of Carpathian Ruthenia by Czechoslovakia to the Soviet Union, and in other Czechoslovak frontier problems*, Foreign Relations of the United States, Diplomatic Papers, 1945, Europe, Volume IV, <https://history.state.gov/historicaldocuments/frus1945v04/ch6> (last visited Jan. 27, 2026) (on file with the Ave Maria Law Review).

22. See generally Joseph Grim Feinberg, *Czechoslovakia 1948*, JACOBIN (Mar. 13, 2018), <https://jacobin.com/2018/03/czechoslovakia-1948-communist-party-repression#:~:text=But%20already%20repression%20had%20begun,a%20Soviet%20orchestrated%20show%20trial> (on file with the Ave Maria Law Review).

the Red Army at Hungary's borders with Slovakia.²³ The Communist regime imposed a totalitarian dictatorship, characterized by centralized planning of the economy, with the abolition of private ownership of capital, and emphasis on the development of heavy industry.²⁴

IV. OPERATION K AND RELIGIOUS PERSECUTION

Czechoslovakia was under Soviet occupation beginning August 20, 1968. The occupation persisted for several months and was a component of the Soviet Union's strategy to maintain control over the Eastern Bloc during the Cold War.²⁵ The Communist regime attempted to eliminate religion and limit the Church's power. On Thursday evening, April 13, 1950, a coordinated operation involving state security personnel, law enforcement officers, and members of the People's Militia encircled seventy-five Czech and sixty-two Slovak monasteries.²⁶ This initial phase of the plan prioritized the largest religious orders within the country, including the Salesians, Jesuits, Redemptorists, and Benedictines. Subsequently, during the second phase of the operation, which transpired a few weeks later, thirteen remaining monasteries were forcibly seized, resulting in the total number of religious buildings under control reaching 219 and the number of monks incarcerated reaching 2,376.²⁷ That same year, Operation K was succeeded by Operation Ř, which specifically targeted the removal of nuns from their respective monasteries.²⁸ The majority of these individuals were subsequently detained in designated centers for a period of two to three years.²⁹ During this time, some of them were subjected to severe abuse, although the last of these

23. Jolyon Naegele, *Czech Republic: Fiftieth Anniversary of Communist Coup Observed*, RADIO FREE EUROPE/RADIO LIBERTY (Feb. 9, 1998, 01:00 CET), <https://www.rferl.org/a/1088011.html> (on file with the Ave Maria Law Review).

24. See generally Jan Hamara, *The Czechoslovak Socialist Republic (1948-1989)*, THE HIST. OF CZECHOSLOVAKIA (2018), <https://scalar.usc.edu/works/dissolution-of-czechoslovakia/the-czechoslovak-socialist-republic-19481989> (on file with the Ave Maria Law Review).

25. See generally GALE STOKES, *THE WALLS CAME TUMBLING DOWN: THE COLLAPSE OF COMMUNISM IN EASTERN EUROPE* (1993).

26. Thomas McEnchroe, "Operation K" - How the Communists wiped out Czechoslovakia's monasteries in one brutal stroke, RADIO PRAGUE INT'L (Apr. 13, 2020), <https://english.radio.cz/operation-k-how-communists-wiped-out-czechoslovakias-monasteries-one-brutal-8103215#:~:text=Exactly%2070%20years%20ago%20the,or%20used%20as%20forced%20labour> (on file with the Ave Maria Law Review).

27. *Id.*

28. *Id.*

29. *Id.*

internment camps remained operational until as late as 1960.³⁰ The Church negotiated with the state, while it developed an underground structure with secretly ordained bishops and patriotic associations.³¹

In addition to the human tragedy, the crackdown on Czechoslovakian monasteries also incurred cultural costs. “The mass confiscation of valuables [housed] within them” resulted in the destruction or disappearance of certain objects from records.³² However, others were ultimately acquired by national galleries and museums. Regarding the buildings themselves, the majority did not fulfill the authorities’ promise of being converted into hospitals or family homes. Instead, they were placed under the administration of the interior and defense ministries. For instance, Prague’s renowned Břevnov Monastery, the oldest such site in the country, was repurposed “into the Interior Ministry’s Central State Archive.”³³

V. THE PRAGUE SPRING

On the night of August 20, 1968, the Soviet Union and Warsaw Pact troops crossed the Czechoslovakian border, surprising the country and the Western world.³⁴ The invasion resulted in the Soviet Union’s control over Prague, major cities, and transportation and communication networks.³⁵ The Soviet Union compelled Alexander Dubcek, the First Secretary of the Czechoslovak Communist Party, to resign and replace him with a more conservative leader.³⁶ The Soviet occupation effectively crushed the reform movement known as the “Prague Spring.”³⁷ As a result of the months-long occupation, Czechoslovakian citizens conducted “mass demonstrations in Prague, Bratislava, Brno, and other cities [and] tens of thousands of students conducted a four-day sit in in high schools and colleges.”³⁸ The occupation resulted in

30. *Id.*

31. *Id.*

32. *Id.*

33. *Id.*

34. Office of the Historian, *Soviet Invasion of Czechoslovakia, 1968*, Milestones 1961-1968, <https://history.state.gov/milestones/1961-1968/soviet-invasion-czechoslovakia> (last visited Jan. 27, 2026) (on file with the Ave Maria Law Review).

35. *Id.*

36. *Id.*

37. See Anna J. Stoneman, *Socialism With a Human Face: The Leadership and Legacy of the Prague Spring*, *THE HISTORY TEACHER* 49(1), 103–25 (2015).

38. Zein Nakhoda, *Czechoslovak resistance to Soviet Occupation, 1968*, GLOBAL NONVIOLENT ACTION DATABASE (June 16, 2011), <https://nvdatabase.swarthmore.edu/content/czechoslovak->

numerous fatalities, including students who resorted to self-immolation in protest.³⁹

A. Cardinal František Tomášek and Charter 77

Following the Soviet-led suppression of the Prague Spring in 1968, Czechoslovakia entered a period known as *normalization*.⁴⁰ This regression towards the communist “status quo”⁴¹ consisted of revoking the laws that were passed during the reform movement, reestablishing ties with other socialist blocs, such as the Soviet Union, and gutting reformers from leadership positions. Unlawful arrests intensified through the 1970s, including members associated with Charter 77 and rightful members of religious opposition.⁴² This movement aimed to reassert state control over all areas of public and private life, including the Church.

The Roman Catholic Church was an obvious target of the Communist regime and became a direct target of the *normalization* policies. The *Pacem in Terris* association—a ‘compliant clergy’ cynically named and misappropriated of Pope John XXIII’s papal encyclical—functioned as state propaganda.⁴³ In 1973, as a capitulation in the face of repression and manipulation, the Vatican appointed four bishops to fill vacancies in Slovakia.⁴⁴

“In May 1976, Pope Paul VI appointed Archbishop František Tomášek to the College of Cardinals *in pectore*” to avoid state interference or severe punishment.⁴⁵ Tomášek distanced himself from the *Pacem in Terris* movement

resistance-soviet-occupation-1968#:~:text=Soviet%20forces%20would%20linger%20in,1%2C000%20were%20wounded%20in%20shootings (on file with the Ave Maria Law Review).

39. *Id.*

40. Michaela Moravčíková, *The Prague Spring of 1968 and its impact on religious life and state-church relations in Czechoslovakia*, 35 VESTN. ST. PETERSBURG U., 378–89, (2019).

41. Communist initiative was led by Gustáv Husák. See *Gustav Husak*, BRITANNICA, <https://www.britannica.com/biography/Gustav-Husak> (on file with the Ave Maria Law Review) (last visited Oct. 31, 2025).

42. Office of the Historian, *110. Report No. 1249 Prepared in the Bureau of Intelligence and Research, Department of State, Foreign Relations of the United States, 1977-1980*, Vol. Xx, Eastern Europe (Oct. 11, 1979), <https://history.state.gov/historicaldocuments/frus1977-80v20/d110#:~:text=%E2%80%94September%2010%20police%20raids,crack%20down%20on%20all%20dissidents> (on file with the Ave Maria Law Review).

43. Moravčíková, *supra* note 40, at 386.

44. *Id.*

45. Felix Corley, *Obituary: Cardinal Frantisek Tomasek*, INDEPENDENT (Aug. 5, 1992), <https://www.independent.co.uk/news/people/obituary-cardinal-frantisek-tomasek-1538238.html> (on file with the Ave Maria Law Review).

and worked cautiously and quietly out of the public view. The appointment of Tomášek was not made public for an entire year.⁴⁶ After the news was out, Tomášek grew more outspoken and publicly criticized Communist attacks on the Church. In December 1977, the Pope raised Tomášek as a full resident of the Archbishop of Prague.⁴⁷ Tomášek continued to challenge the government, allowing him to gain support from the people and align with Charter 77. Charter 77 was an initiative formed in 1977 to inspire the Czechoslovakian government to honor the human rights that were promised under the Helsinki Accords.⁴⁸ Tomášek's push for religious freedom aligned with the movement's principles and helped formulate a framework of justice. His leadership protected many Catholics who sought peaceful resolution and openly dissented from the government's policies. By the late 1980s, Tomášek gained enough popularity to call for the release of political prisoners, including Václav Havel.⁴⁹ In November 1989, Tomášek courageously inspired mass protests, forcing what would become the Velvet Revolution.

VI. THE VELVET REVOLUTION AND THE VELVET DIVORCE —THE PATH TO CIVIL RIGHTS AND PROSPERITY

The Velvet Revolution (1989) was the end of the Communist Party's forty-one-year rule in Czechoslovakia. In 1989, mass protests broke out and toppled the Communist regime.⁵⁰ The Velvet Divorce (1992) resulted in the separation of the federal republic into the independent countries of the Czech Republic (Czechia) and Slovakia.⁵¹ Both nations mirrored the Czech Socialist Republic and the Slovak Socialist Republic, constituent states of the Czechoslovak Socialist Republic from 1969 to 1989.⁵²

46. Moravčíková, *supra* note 40.

47. *Id.*

48. *Id.*

49. For an extensive summary on Tomášek's "Underground Church," see TOMÁŠ HALÍK, *FROM THE UNDERGROUND CHURCH TO FREEDOM* (Gerald Turner trans., Univ. of Notre Dame Press, 2019).

50. Michael Simmons, *Czechoslovakia's Velvet Revolution – archive, November 1989*, THE GUARDIAN (Nov. 13, 2019, 07:04 EST), <https://www.theguardian.com/world/from-the-archive-blog/2019/nov/13/czechoslovakia-velvet-revolution-november-1989> (on file with the Ave Maria Law Review).

51. See Steve D. Boilard, *Czechoslovakia Splits into Two Republics*, EBSCO (Jan. 1, 1993), <https://www.ebsco.com/research-starters/history/czechoslovakia-splits-two-republics> (on file with the Ave Maria Law Review).

52. See Krzysztof Debiec, *Czechoslovakia and contemporary Czech-Slovak relations*, OSW STUDIES (May 30, 2025), <https://www.osw.waw.pl/en/publikacje/osw-studies/2025-05-30/to-uz-se-nevrati> (on file with the Ave Maria Law Review).

The Velvet Revolution signaled the collapse of communist rule in Czechoslovakia and began the nation's transition to democracy.⁵³ Shortly after the start of the Velvet Revolution, the Communists relinquished power and the first free elections were held since 1946.⁵⁴ The Revolution opened back up the possibility of civil liberties, the rule of law, and market-based reform.⁵⁵

Following the Revolution, however, tensions between Czech and Slovak leaders gradually deepened. These disagreements culminated in the peaceful dissolution of Czechoslovakia in 1992, widely known as the Velvet Divorce.⁵⁶ The split was orchestrated through negotiations with the Czech Republic and Slovakia formally emerged as sovereign nations on January 1, 1993.⁵⁷ Following the dissolution, Czechia adopted a constitutional framework that prioritized fundamental rights for its citizens. The 1993 Constitution garnered its influence from European liberal democracy and used the separation of powers for the protection of individual rights.⁵⁸

VII. DISSOLUTION TO DEVELOPMENT: CZECH AND SLOVAK REPUBLICS AFTER 1993

The Czech Constitution officially took effect on January 1, 1993.⁵⁹ It was drafted following the emergence of Czechoslovakia into the Czech and Slovak Republics.⁶⁰ The Czech Republic's Constitution and Charter of Fundamental Rights and Freedoms protect religious freedom.⁶¹ The Charter guarantees the right to one's religion, including freedom to change one's religion or to remain

53. See BERNARD WHEATON & ZDENĚK KAVAN, *THE VELVET REVOLUTION: CZECHOSLOVAKIA, 1988-1991* 3 (Routledge 2018) (1992) (providing a detailed narrative of how and why the Revolution occurred).

54. *Id.*

55. *Id.*

56. See CAROL SKALNIK LEFF, *INEVITABILITY, PROBABILITY, POSSIBILITY: THE LEGACIES OF THE CZECHO-SLOVAK RELATIONSHIP, 1918-1989, AND THE DISINTEGRATION OF THE STATE*, in *IRRECONCILABLE DIFFERENCES? EXPLAINING CZECHOSLOVAKIA'S DISSOLUTION* (Michael Kraus & Allison Stanger, eds., 2000).

57. Boilard, *supra*, note 51.

58. See *The Czech Constitution at 30: A symbol of stability with a few minor glitches*, EXPATS.CZ (Dec. 19, 2022, 11:33), <https://www.expats.cz/czech-news/article/politicians-reflect-on-the-czech-constitution-turning-30> (on file with the Ave Maria Law Review).

59. *Id.*

60. *Id.*

61. Constitutional Act No. 2/1993 Coll., Charter of Fundamental Rights and Freedoms (Dec. 16, 1992).

secular.⁶² It also includes the separation of religion from the state.⁶³ Further, it has a broad range of constitutional protections—freedom of thought and conscience, freedom of speech with a prohibition on censorship, freedom of assembly, and the right of conscientious objectors to refuse military service.⁶⁴ The Constitution secures the Czech Republic as a secular state unaffiliated with any ideology.⁶⁵ The Charter retains limitations on religious expression if it poses a threat to public safety, health, morals, or the rights of others.⁶⁶

The Czech Republic's GDP was recently listed at \$347.03 billion U.S. dollars in 2024.⁶⁷ The GDP of Slovakia was \$140.9 billion U.S. dollars in 2024.⁶⁸ The Czech Republic maintains high ranks in areas of safety, economics, and healthcare.⁶⁹ However, the Czech Republic faces “high, though moderating, inflation (reaching 2.1% in late 2025) and structural issues like sluggish productivity.”⁷⁰ However, for 2025, *The Economist* ranked the country 6th globally among developed economies, and in comparison to other surrounding post-communist countries in the region, its economy is still considered to be thriving.⁷¹

Even though Slovakia has gained in its economic growth since joining the European Union (EU), it continues to lack widespread prosperity. Slovakia still falls below the average level of prosperity compared to other European countries, ranking 24th out of 27 in a new EU Prosperity Index.⁷² While the environment continues to lag behind the Organisation for Economic Co-operation and Development average, Slovakia still maintains its strength in

62. *Id.* at Art. 16.

63. *Id.* at Art. 17.

64. *Id.* at Art. 15.

65. *Id.* at Art. 3, 15.

66. *Id.* at Art. 16.

67. GDP (current US\$) – Czechia, WORLD BANK GROUP, <https://data.worldbank.org/indicator/NY.GDP.MKTP.CD?locations=CZ> (last visited Jan. 27, 2026) (on file with the Ave Maria Law Review).

68. *Id.*

69. Thomas Smith, *Experts rank Czechia among Europe's top safe havens for expats*, EXPATS.CZ (updated May 22, 2025), <https://www.expats.cz/czech-news/article/experts-rank-czechia-among-europe-s-top-safe-havens-for-expats> (on file with the Ave Maria Law Review).

70. International Monetary Fund European Dept., *Czech Republic: Selected Issues*, IMF ELIBRARY (Feb. 4, 2025), <https://www.elibrary.imf.org/view/journals/002/2025/036/article-A001-en.xml> (on file with the Ave Maria Law Review).

71. See Jakub Ferencik, *The Economist ranks Czechia among world's leading economies in 2025*, RADIO PRAGUE INTERNATIONAL (Dec. 16, 2025), <https://english.radio.cz/economist-ranks-czechia-among-worlds-leading-economies-2025-8872028> (on file with the Ave Maria Law Review).

72. See Spectator Staff, *Slovakia ranks near bottom in EU prosperity. What went wrong?*, THE SLOVAK SPECTATOR (June 12, 2025, 21:00), <https://spectator.sme.sk/business/c/slovakia-ranks-near-bottom-in-eu-prosperity-what-went-wrong> (on file with the Ave Maria Law Review).

pursuing “education for a life in dignity,” “transformation towards a knowege based and environmentally sustainable economy,” “rule of law, democracy and security,” and “good health.”⁷³

CONCLUSION

The Czech experience under Communism was one of profound widespread suffering—what might more aptly be described as the “unbearable burden of being” under totalitarian rule. Through the inhumane labor in the gulags, along with the destruction of monasteries, the Communist regime tried to extinguish the human spirit itself. Religious circles were widely attacked, and individual dignity was denied. Despite this evil, courageous ordinary citizens in society and in the Church, embodied the Czech spirit and fought as the resistance to tyranny. The Velvet Revolution and Divorce opened the door to a new identity consisting predominantly of democracy and human rights. The Czech Republic’s constitutional order, situated to protect fundamental freedoms, reflects true resilience and inspirational transformation. The Czech journey from totalitarianism to a greater expansion of individual liberties shows how even through a bout of dire oppression, a great nation can still hold on to its values and eventually reclaim its freedom.

73. Ministry of Investments, Regional Development and Informatization of the Slovak Republic, *Report on the results achieved in the national priorities for the implementation of the 2030 Agenda*, Agenda2030.statistics.sk (Sep. 2020), https://agenda2030.statistics.sk/Agenda2030/wp-content/uploads/2021/03/Report_on_the_results_achieved_in_the_national_priorities.pdf (on file with the Ave Maria Law Review).