Slovenian clitics are Wackernagel clitics, that is, they are standardly located in the second position in the clause. Unlike Serbian clitics, which are always enclitics and can thus appear also in the third position in the clause if this represents the second position in a prosodic domain, Slovenian clitics are claimed to always follow the first syntactic constituent: see the difference between Serbian and Slovenian in (1) (Golden and Milojević Sheppard 2000, Bošković 2001).

(1) a. Deček, ki ima črno srajco, mi je dal bicikel. Slovenian
   b. Dečak koji ima crnu košulju dao mi je biciklu. Serbian
   'The boy in a black shirt gave me a bike.'

Golden and Milojević Sheppard (2000) claimed that Slovenian clitics move in the syntax to the highest head C and that a syntactic constituent then moves further to Spec,CP, which thus ensuring the clitics are in the second syntactic position. This solution has been shown to be incorrect, as a number of tests reveal that clitics do not occupy a single position in the syntax (Bošković 2001, Marušič 2007). Bošković (2001) then proposed that clitics still move in the syntax, but that their position is later evaluated at PF, since they have to appear in the second position in a prosodic phrase. This snippet will show that neither Golden and Milojević Sheppard's nor Bošković's analysis can be correct, since Slovenian clitics do not have to occupy the second position in the syntax and thus cannot be located in the C head, nor do they seem to move in the syntax.

Slovenian has some clitic adverbs that are typically proclitics. For example že 'already' needs a host, which can be another adverb, a verb, a PP adverbial, etc. Even though this adverb represents the first syntactic constituent in the clause in (2-3), the pronominal and auxiliary clitics (i.e. the Wackernagel clitics) cannot follow it. They have to be located after the first prosodic word.

(2) a. Že velikokrat ji je stopil na prste med plesom. already manytimes she she is stepped on toes during dance 'He has stepped on my toes many times by now during dancing.'
   b. *Že ji je velikokrat stopil na prste med plesom.

(3) a. Že od včeraj mi je Peter dolžen 5 €. already from yesterday I is Peter indebted 5 € 'Peter has owed me €5 already since yesterday.'
   b. *Že mi je od včeraj Peter dolžen 5 €.

Since the two adverbs of the clause, i.e. 'already' and 'many times' in (2) and 'already' and 'from yesterday' in (3), cannot both be in Spec,CP, the pronominal clitics are clearly not located in the highest head of the clause. If we allow multiple specifiers, we would have to allow them also with NPs, which would lead to a massive overgeneration.

In principle, Bošković's approach could work; but since Slovenian clitics can be both proclitic and enclitic, and can in principle appear to the left of their host, as in (1a), there is no way to rule out (2b) and (3b). Note that že need not be adjacent to its prosodic host, as shown in (3a).