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**SPECIAL STATE PROSECUTOR'S OFFICE**  
**Podgorica**

Pursuant to Article 255, paragraph 1, and Articles 3 and 5 of the Law on the Liability of Legal Entities for Criminal Offenses, and in accordance with Article 256, paragraph 1 of the Criminal Procedure Code and Article 3, paragraph 2 of the Law on the Special State Prosecutor's Office, I submit the following:

***CRIMINAL COMPLAINT***

**Against:**

1. Political party "Democrats – Democratic Montenegro" with its headquarters in Podgorica, 8. Marta Street No. 72
2. Danilo Šaranović, Minister of Internal Affairs in the Government of Montenegro
3. Lazar Šćepanović, Acting Director of the Police Directorate
4. Aleksa Bečić, Deputy Prime Minister of Montenegro and President of the political party "Democrats – Democratic Montenegro"
5. Boris Bogdanović, Member of Parliament of "Democratic Montenegro" in the Parliament of Montenegro
6. Anđela Vojinović, Member of Parliament of "Democratic Montenegro" in the Parliament of Montenegro
7. Members of the Commission for Verification of Security Obstacles for Performing Police Duties
8. Several unidentified persons – officials of the Police Directorate responsible for entering operational data into the system of the Police Directorate

– on the grounds of reasonable suspicion that they committed the criminal offense of creating a criminal organization under Article 401a, paragraph 2 in connection with paragraph 1, in concurrence with the criminal offense of abuse of official position on a continuous basis under Article 416, paragraphs 1 and 3, in connection with Article 49, paragraph 1 of the Criminal Code of Montenegro, in concurrence with the criminal offense of abuse of official position on a continuous basis through incitement and aiding and abetting under Article 416, paragraphs 1 and

3, in connection with Article 49, paragraph 1, and in connection with Articles 24 and 25 of the Criminal Code of Montenegro, in concurrence with the criminal offense of forgery of an official document on a continuous basis under Article 414, paragraph 1 in connection with Article 49, paragraph 1 of the Criminal Code, in concurrence with the criminal offense of endangering security on a continuous basis under Article 168, paragraph 1 and Article 168, paragraph 4 in connection with paragraph 1 and in connection with Article 49, paragraph 1 of the Criminal Code of Montenegro,

because they:

from the end of October 2023 until the day of submitting this criminal complaint, fully aware of their actions and with intent to carry them out, they became members of a criminal organization organized by an as-yet unidentified person (possibly one of the reported members of the political party "Democrats – Democratic Montenegro"). This organization aimed to commit criminal offenses punishable by a prison sentence of four years or more, in order to gain unlawful profit and power for the benefit of the political party "Democrats – Democratic Montenegro" and for the benefit of other accused individuals, to the detriment of the complainants and other police officers, and ultimately to the detriment of the state of Montenegro. Each member of the organization had a predetermined or determinable task; the organization's activities were planned for a long duration or an indefinite period. The organization's activities were based on the application of rules of internal control and discipline among its members; intimidation was used in the organization's activities, and the criminal organization exerted influence on the political authority, media outlets, as well as on the legislative and executive branches,

- Thus, the reported political party "Democrats – Democratic Montenegro," as part of the criminal organization, had the role and task that, following the distribution of ministries in the Government of Montenegro, in the security sector to appoint the reported and other individuals who, by abusing their official position—that is, by exploiting their official position and exceeding their official powers—would gain illegal political and economic benefits for the benefit of that political party and other reported persons, while simultaneously causing damage to the state budget, the complainants, and other victims by violating their fundamental human rights and freedoms.
- The reported Danilo Šaranović, within the criminal organization, had the role and task that, after the formation of the Commission for Verification of Security Obstacles for Performing Police Duties, to instruct the members of that commission to determine the existence of security obstacles for certain police officers contrary to the procedure prescribed by the Law on Internal Affairs, and to use his official position as Minister of Internal Affairs to accuse and present every critic and every person who points out illegal actions, reveals criminal offenses, or prevents and obstructs their commission as members of criminal clans.

- The reported Lazar Šćepanović, within the criminal organization, had the role and task that, after his election as acting director of the Police Directorate, to give orders to the reported unidentified persons—police officers—to continuously enter unverified, unconfirmed, and false operational data for police officers designated by the criminal organization for "security checks" into the special application "InfostreamV2," marked as the intelligence project "Badge," in order to establish security obstacles for their further work in the Police Directorate. The reported members of the Commission for Verification of Security Obstacles for Performing Police Duties accepted such tasks and unlawfully—contrary to the provisions of the Law on Internal Affairs—conducted "security checks" in several dozen cases by not seeking the opinion of the National Security Agency in accordance with Article 162, paragraph 1, item 2 of the Law on Internal Affairs, but by exceeding their official powers, they independently determined security obstacles based on false, unverified, and unconfirmed "operational data" entered into the "InfostreamV2" application by the reported unidentified persons—police officers—by prior agreement with the other reported individuals.
  
- The reported Aleksa Bečić, in his capacity as Deputy Prime Minister of Montenegro for Security, Defense, Fight Against Crime and Internal Policy, had the role and task to unlawfully use his official position and falsely present himself as the Deputy Prime Minister. He falsely represented to the public that the reported individuals were fighting crime and implementing the so-called vetting in the police. At the same time, he falsely labeled the reported individuals and other police officers who were unlawfully suspended as members of criminal clans, thereby directly endangering their safety and violating their fundamental human rights and freedoms. Through his influence on the executive and legislative authorities, he undertook actions to help the criminal organization and its members avoid detection and proof of the criminal offenses they committed, while falsely presenting to the public that these reported individuals were fighting crime.
  
- The reported Boris Bogdanović, as a Member of Parliament and member of the Defense and Security Committee of the Parliament of Montenegro, who has access to classified information, had the role and task of writing statements that falsely represented the complainants and their attorney, as well as other suspended police officers, as members of criminal clans, both for himself and other members of the criminal organization. By doing so, he directly endangered their safety and violated their fundamental human rights and freedoms, while simultaneously inciting and aiding other reported individuals to commit criminal offenses.
  
- The reported Anđela Vojinović, as a Member of Parliament of Montenegro, also had the task of reading and conveying the statements written for her by the reported Bogdanović and falsely representing the complainants and their attorney, as well as other suspended police officers, as members of criminal clans in public, as well as issuing direct threats, thereby endangering their safety and security and violating their fundamental human rights.
  
- All reported individuals who are officials of the reported political party "Democrats – Democratic Montenegro" had the roles and tasks to, through political positions in the

executive and legislative authorities, falsely present themselves as fighters against crime, while at the same time representing the complainants and their attorney, as well as other suspended police officers and anyone who criticized them, as members of criminal clans, and to cover up their illegal actions and abuse of official powers. Thus, at the end of July this year, in order to realize their criminal plan, they attempted to influence the legislative authority by, through MPs of the Democrats, submitting to the parliamentary procedure a Draft Law amending the Law on Internal Affairs, without public debate or any consultations with domestic or foreign experts. This draft law stipulated that the opinion of the National Security Agency regarding the existence of security obstacles would no longer be necessary, and by force of law, the employment relationship would even terminate for all police officers against whom disciplinary proceedings had been initiated.

### **EXPLANATION**

At the end of October 2023, the current Government of Montenegro was elected, in which the reported Aleksa Bečić and Danilo Šaranović were appointed to significant positions in the security sector. The reported Bečić was appointed Deputy Prime Minister for Security, Defense, Fight Against Crime and Internal Policy, and the reported Šaranović was appointed Minister of Internal Affairs. Immediately after their election to these positions, the reported individuals began actions aimed at implementing their criminal plan, focusing their activities on gaining complete control over the Police Directorate. Thus, at the Government session in March 2024, the reported Šaranović proposed the reported Lazar Šćepanović as acting director of the Police Directorate, but the Government did not accept his proposal, and Aleksandar Radović was chosen as acting director.

Acting according to the earlier criminal plan of the reported individuals to publicly target and portray anyone who obstructs them in carrying out their criminal plan and committing crimes as criminals, the reported Danilo Šaranović at the same Government session accused members of the Government to which he also belongs of committing a criminal offense. The reported Šaranović accused the Government of grossly violating the law, assuming his powers, and exceeding its authority by voting Aleksandar Radović as unlawfully appointed acting director of the Police Directorate. Before the vote, the reported Šaranović warned Prime Minister Milojko Spajić by letter about the consequences if his candidate, the reported Lazar Šćepanović, was not chosen as acting director.

### **EVIDENCE:**

- Materials from the Government of Montenegro session from March 2024,
- Publicly published information in the media, including an article on the Radio Free Europe portal: <https://www.slobodnaevropa.org/a/vlada-crne-gore-izbor-direktor-policije/32859598.html>
- Testimonies of the reported individuals,
- Testimonies of Prime Minister Milojko Spajić and members of the Government of Montenegro

Thus, the reported Šaranović, according to the prior criminal plan, even accused the Government because at that moment it prevented the realization of the reported individuals' criminal plan to appoint Lazar Šćepanović as police director in order to commit criminal offenses through unlawful security checks on persons who were not members of their criminal organization and who could potentially uncover the criminal offenses committed by the reported individuals.

In the same manner, following the prior criminal plan, the reported political party "Democrats – Democratic Montenegro," the reported Boris Bogdanović, and the reported Anđela Vojinović acted, additionally accusing the appointed acting director of the Police Directorate Aleksandar Radović of being "a cadre of the former top police official Veselin Veljović, accused of committing serious criminal offenses in the field of organized crime and corruption."

**EVIDENCE:** The statement of the reported "Democrats – Democratic Montenegro," signed also by the reported Boris Bogdanović and reported Anđela Vojinović, dated March 13, 2024, published in the media, among others at: [https://www.vijesti.me/vijesti/politika/697942/demokrate-radovic-je-kadar-veselina-veljovica-saranovic-da-do-raspleta-krize-vlasti-obezbijedi-funkcionisanje-sektora?utm\\_source=vijesti&utm\\_medium=article\\_related&utm\\_campaign=article\\_intext\\_related](https://www.vijesti.me/vijesti/politika/697942/demokrate-radovic-je-kadar-veselina-veljovica-saranovic-da-do-raspleta-krize-vlasti-obezbijedi-funkcionisanje-sektora?utm_source=vijesti&utm_medium=article_related&utm_campaign=article_intext_related)

Nevertheless, the reported individuals succeeded in implementing this part of the criminal plan, and the reported Lazar Šćepanović was appointed acting director of the Police Directorate in December 2024, with his mandate extended for another six months at the end of May 2025.

Immediately upon the appointment of the reported Šćepanović as acting director of the Police Directorate, the reported individuals intensified their work on further implementing the criminal plan, including intensifying selective security checks carried out unlawfully, under the orders of the reported Bečić and the reported Šaranović.

The reported Danilo Šaranović also changed the composition of the Commission for Verification of Security Obstacles for Performing Police Duties, which is tasked with checking for the existence of security obstacles for further work in police service.

**EVIDENCE:** Decision on the formation of the Commission for Verification of Security Obstacles for Performing Police Duties, to be obtained through official channels.

Immediately after being appointed Deputy Prime Minister in October 2023, the reported Aleksa Bečić, in carrying out the joint criminal plan, had the role and task of unlawfully using his official position and falsely presenting himself as the Deputy Prime Minister. He thus falsely represented to the public that the reported individuals were fighting crime and implementing the so-called vetting process in the police, although the vetting process is not prescribed by any regulation, nowhere is it defined who conducts it, under what conditions, in which procedure, and with what guarantees that basic human rights will be respected and the process will be conducted impartially and legally, rather than arbitrarily and at anyone's personal or party interest. These activities were intensified by the reported Bečić after the appointment of the reported Lazar Šćepanović as acting director of the Police Directorate, when all conditions were created to selectively enter false,

unverified, and unconfirmed operational data into the special application “InfostreamV2” marked as intelligence project “Badge.” These data served as a “basis” for suspensions and initiation of disciplinary procedures. At the same time, he falsely labeled the reported and other police officers who were unlawfully suspended as members of criminal clans, thereby directly endangering their safety and violating their basic human rights and freedoms. Through his influence on the executive and legislative authorities, he took actions to help the criminal organization and its members avoid detection and proving of the crimes they committed, while falsely representing to the public that they themselves were fighting crime.

**EVIDENCE:** Public statements of the reported Bečić from October 2023 until now, published on the Government of Montenegro website: <https://www.gov.me/>, as well as in print and electronic media.

Acting according to the prior criminal plan and the tasks and roles they were assigned, the reported members of the Commission for the Verification of Security Obstructions in Police Work began with selective alleged checks and unlawfully prepared reports in which they summarily and without evidence asserted the existence of security obstructions for the complainants, as well as for several dozen police officers. In these reports, they even emphasize that the operational data used are unverified and unconfirmed. In several cases, the reported members of the Commission did not request an opinion from the National Security Agency in accordance with the law regulating national security, which they were obliged to do under Article 162, paragraph 5 of the Law on Internal Affairs when it comes to security obstructions related to maintaining contacts with persons who unlawfully collect secrets and other data, terrorists, saboteurs, members of organized criminal groups, or persons reasonably suspected of belonging to such groups.

Pursuant to Article 162, paragraphs 6 and 7 of the Law on Internal Affairs, the National Security Agency must provide an opinion within 90 days, and if it does, it will be considered that such a security obstruction does not exist. However, the reported persons, aware of their actions and intending to carry them out, violated these legal provisions in several dozen cases, suspended dozens of police officers without giving them the opportunity to respond to any circumstances, and even without informing them of the charges against them, initiating disciplinary proceedings against all of them.

**EVIDENCE:** Files of disciplinary proceedings against the complainants and other police officers, to be obtained through official channels.

The security obstructions were “determined” by the reported persons from the database in a special application “InfostreamV2” marked as intelligence project “Badge,” into which the reported persons and other unidentified persons, under their orders, entered false and unverified “operational data,” which the reported persons themselves admit are unverified and unconfirmed data. Based on such reports containing false data, the reported persons carried out a form of persecution, unjustifiably accused the complainants and several other police officers of actions which by their nature constitute serious criminal offenses, removed them from service, and initiated disciplinary proceedings without giving them any possibility to defend themselves against the accusations or to be informed about what and on what basis they were being charged.

**EVIDENCE:** Reports of the Commission for the Verification of Security Obstructions in Police Work on the basis of which disciplinary proceedings were initiated, to be obtained through official channels.

Suspension orders and disciplinary files against the complainants and other police officers, to be obtained through official channels.

At the same time, the accused Danilo Šaranović classified the reports of the Commission for the Verification of Security Obstructions in Police Work as confidential in order to conceal false information and illegal actions by himself and the other accused. As a result, the accused denied the complainants and other police officers—who were accused solely on the basis of these documents—as well as their lawyers, the right to access these documents.

In this way, the accused unlawfully, fully aware of their actions and with intent to carry them out, abused their official positions and exceeded their official powers, thereby gaining personal benefit, while seriously violating the rights of the complainants and other police officers by unlawfully restricting the principle of publicity in the proceedings initiated against them.

Article 6 of the European Convention for the Protection of Human Rights and Fundamental Freedoms guarantees the right to a public hearing for everyone during the determination of their civil rights and obligations, which also applies to disciplinary proceedings against the complainants and other police officers who fail security checks. In any case, the public can never be excluded in relation to the parties and their representatives, only with respect to third parties. In this specific case, the accused grossly violated the rights of the complainants and other police officers by excluding the public in relation to them and their representatives—their lawyers—and this was done with respect to the only document used as “evidence,” without giving them any possibility to respond to arbitrary and false accusations. The principle of publicity ensures public oversight over bodies exercising public authority, in line with the principle of sovereignty stated in Article 2 of the Constitution of Montenegro, which affirms the direct exercise of power by the citizens. Furthermore, according to the general principle of publicity in administrative proceedings, oral hearings must be public.

Since the publicity of proceedings is a rule, or principle, prescribed by the European Convention for the Protection of Human Rights and Fundamental Freedoms, the Constitution, and the law, any exclusion of the public is an exception that requires the authority conducting the procedure to issue a special decision on excluding the public and to provide clear and convincing reasons, as well as the legal basis, for deciding to exclude or limit publicity.

The accused Šaranović unlawfully classified as secret the commission’s reports that served as grounds for suspensions and the initiation of proceedings against the complainants and other police officers, thereby denying them the right to comment on that document and on the arbitrary and false accusations at all. At the same time, in line with the prior criminal plan, the accused publicly accused the complainants and other police officers of being parts of and protectors of organized crime, all based on a document they themselves prepared and classified as secret.

According to Article 6 of the European Convention for the Protection of Human Rights and Fundamental Freedoms, publicity may be excluded from the proceedings in the interest of morals,

public order, or national security in a democratic society, when required by the interests of minors or the protection of the private life of the parties, or to the extent strictly necessary in special circumstances where publicity might harm the interests of justice. None of these grounds for excluding publicity exist in this particular case, and even if they did, publicity could still not be excluded concerning the parties and their representatives, as the accused unlawfully did.

Therefore, by arbitrarily excluding the public for the parties and their representatives, the accused violate the European Convention for the Protection of Human Rights and Fundamental Freedoms, the Constitution of Montenegro, and the law, and grossly infringe on the rights and interests of the parties to participate in the proceedings deciding on their rights and obligations and to defend themselves against arbitrary and false accusations made against them.

Furthermore, Article 162, paragraph 1, points 1 and 2 of the Law on Internal Affairs stipulate that security obstacles to further work in a police rank are considered to exist if, besides grounds for termination of employment by law, in accordance with this law, a police officer:

1. is registered in the record of narcotics users, maintained by the state administration authority responsible for health affairs, and
2. maintains connections with persons who unlawfully collect secrets and other data, terrorists, saboteurs, members of organized crime groups, or persons reasonably suspected to belong to such groups.

In the case of the complainants and in several dozen other cases, the accused claimed that precisely these security obstacles existed, although the complainants and several dozen other suspended police officers have never used narcotics and could not have been registered as narcotics users in the Ministry of Health's records, nor have they ever maintained connections with any persons who unlawfully collect secrets or other data, and have no connections whatsoever—and never had any—with terrorists, saboteurs, members of organized crime groups, or persons reasonably suspected of belonging to such groups.

For this reason, the accused members of the Commission for the Verification of Security Obstacles did not obtain an opinion from the National Security Agency (ANB), thereby grossly abusing their positions and exceeding their official powers by making serious accusations against the complainants and several dozen police officers, falsely presenting them as persons who use narcotics and cooperate with terrorists, saboteurs, and members of organized crime groups.

Such allegations constitute serious criminal charges and indicate the commission of grave criminal offenses, and the norms prescribing and sanctioning such acts have general effect. Therefore, the arbitrary accusation of the complainants and other police officers constitutes a violation of Article 6, paragraph 3a of the European Convention for the Protection of Human Rights and Fundamental Freedoms, which requires precise information about criminal charges (*Mattoccia v. Italy*, 2000). The European Convention for the Protection of Human Rights and Fundamental Freedoms does not cease to apply at the doors of the office of the accused Minister Šaranović and Deputy Prime Minister Bečić, nor can the accused members of the Commission for the Verification of Security Obstacles be exempted from the obligations prescribed by the Convention by claiming that,



according to the Law on Internal Affairs, they have no obligation to state the reasons on which the determination of the existence of security obstacles was based.

Finally, when the complainants' legal representative announced that a criminal complaint would be filed, first the accused Boris Bogdanović, according to the prior criminal plan to respond to any criticism and attempts to reveal criminal acts by unlawfully exploiting official positions in the legislative and executive powers with unfounded and false accusations, publicly accused the complainants' legal representative—lawyer—of being “the spokesperson of those who held the state in the shackles of crime,” of “trying to slander people for the spokesperson's pay of a small group of obscure dilettantes,” of “spouting nonsense typical of political mice who speak only when stepped on by the mafia and sent on a mission,” that he belongs to people “without backbone, whose only pillar of behavior is a deeply rooted fear of those to whom they promised to free them from accusations and responsibility,” that he “blindly obeys the orders of his protectors,” that he is “a spokesperson for those whom Montenegrins would say have a black face, and the people know well that a black face is not washed away by court verdicts or spokesperson's statements,” that he is “a spokesperson for parties that turned the security sector into an outpost of organized crime,” and that he has spent his entire life “serving those whom he is now defending.” The accused Bogdanović, in carrying out the criminal plan of the criminal organization of which he is a member, with the intention of preventing the discovery of criminal acts within the organization, unfoundedly accused the complainants and several other police officers by claiming that “about a hundred police officers were not suspended because they have party membership cards, but due to much more serious violations for which Montenegro is ashamed before the world.”

EVIDENCE: Publicly released statement by the accused Bogdanović dated August 15, 2025, available among others at: <https://www.portalanalitika.me/clanak/bogdanovic-radulovic-potvrdio-da-je-glasnogovornik-onih-koji-su-drzavu-drzali-u-okovima-kriminala> as well as at: <https://etv.me/politika/bogdanovic-sasuo-optuzbe-na-racun-radulovica-mi-nijesmo-sluge-vasih-gazda-pa-da-se-uplasimo-kad-zaprijetite>

After that, in the same role and with the same task aimed at realizing the criminal plan, the accused Anđela Vojinović falsely accused the complainants' legal representative of having criminal complaints written by the Kavač and Škaljari clans, that he is a “public representative of a criminogenic party and their criminal satellites,” that the cause is “media reports on the suspensions of certain police officers, those very ones who have been protectors of crime for years,” that the public remembers him “as a suspended police officer,” that he has “become the spokesperson of those sinking in their own fear,” that he “signs what others write,” that he “enjoys it while it lasts,” because he faces “retribution,” and that “both he and the party he serves will cry.”

EVIDENCE: Publicly released statement of the accused Vojinović dated August 15, 2025, available among others at: <https://press.co.me/vojinovic-suspendovane-policaјce-brani-suspendovani-policaјac/> as well as at: <https://rtcg.me/vijesti/drustvo/744820/vojinovic-suspendovane-policaјce-brani-suspendovani-policaјac.html>

Thus, the criminal organization, through its member Vojinović, showed readiness to apply intimidation and threats against those who hold them accountable.

Also, the accused political party “Democrats Democratic Montenegro,” in response to the reaction of Tea Gorjanc Prelević, the complainants’ legal representative, stated that she “files criminal complaints against those who fight against crime, while simultaneously defending those suspended because, according to the competent authorities, they are unworthy of the police uniform,” that this spin is “worthy of the spins of Milivoje Katnić, who, just like lawyer Radulović, filed criminal complaints against honest citizens, while Zoran Lazović declared criminals honorary citizens,” and that she “threatens on behalf of those who have worked against the state and the people for decades while wearing a uniform.”

EVIDENCE: Publicly released statement of the accused political party “Democrats Democratic Montenegro” dated August 22, 2025, available among others at: <https://www.cdm.me/hronika/demokrate-gorjanc-prelevic-precutkuje-istinu-o-radulovicu-predstavljajuci-ga-kao-moralnog-autoriteta-i-zrtvu/>

After that, the accused political party “Democrats Democratic Montenegro” accused Tea Gorjanc Prelević of having “formed a group with the complainants’ legal representative to oppose vetting in the Police Directorate and security services,” stating that it is a fabrication “which, together with Radulović and criminal media, she tries to impose, equating the suspension of police officers due to unauthorized contacts with members of criminal organizations, saboteurs, terrorists, or because they are narcotics users, with the dismissal of principals of primary and secondary schools,” that she “does not choose means in her attempt to defend those whose place should have been with the clans, not in state institutions,” that they “try to maintain old connections in the police and security services,” that this is “their goal, to preserve the pillars of a system that has worked for crime for decades, not for the people,” and that “she is bothered by a party that fights against crime.”

EVIDENCE: Publicly released statement of the accused political party “Democrats Democratic Montenegro” dated August 23, 2025, available among others at: <https://www.antenam.net/politika/378375-demokrate-tvrde-gorjanc-prelevic-zeli-da-sprijeci-veting-i-sacuva-kadrove-koji-su-sluzili-mafiji>

as well as at: <https://www.portalanalitika.me/clanak/demokrate-gorjanc-prelevic-precutkuje-istinu-o-radulovicu>

Thus, the accused, in implementing the criminal plan, not only presented the complainants and several police officers who were suspended without the right or opportunity to respond to any facts or circumstances, but also their lawyer and civil sector representative as people who work for criminal clans, who serve the mafia and execute its orders, including direct threats to the lawyer such as claims that he faces “retribution” and that he will “cry.”

The threats from the accused are serious because they come from persons who lead the repressive apparatus, and they are especially serious because they come from a political party and officials for whom this prosecution has evidence in the form of SKY application chats showing that they were members of criminal clans buying votes on their behalf and account.

EVIDENCE: Chats from the SKY application which are in this prosecution's possession.

It is well-founded and realistic to conclude that members of criminal organizations, in buying votes on behalf of and for the account of the accused, received some form of consideration, and that they did not buy votes without first receiving a promise of some benefit from the accused, who took over the leadership of the security sector. It is also well-founded and realistic to conclude that the accused and the criminal organization of which they are members, after taking over leadership of the security sector, returned favors to members of other criminal organizations who bought votes on their behalf. Therefore, the prosecution should, as soon as possible, undertake actions regarding this criminal complaint because there is a well-founded suspicion that behind the threats that the accused directed at the complainants, their legal representative, and a civil sector representative, stand criminal clans who helped the accused obtain political support and take over leadership of the security sector.

From the allegations in the criminal complaint and the prolonged conduct of the accused, it follows that the criminal organization of which the accused became members was founded to commit criminal offenses, and that its members engage in the commission of criminal offenses to achieve the purpose for which the criminal organization was established—that is, to gain profit and power. In doing so, the accused used their functions and positions in the security sector to avoid detection and proof of the criminal offenses they committed, presenting themselves to the public as those fighting crime, while simultaneously, from positions of power, threatening and attempting to intimidate anyone who pointed out violations of the law or called them to account.

From the allegations in the criminal complaint and the evidence cited, it follows that the accused acted according to pre-arranged tasks, that they became members of a criminal organization whose goal was to commit criminal offenses punishable by imprisonment of more than four years, for the purpose of obtaining unlawful profit and power in favor of the criminal organization and the accused, with each accused having a predetermined task and role. Thus, the accused, using their positions in the security sector, publicly falsely represented that they were fighting crime, while simultaneously concealing the commission of criminal offenses and evidence that would reveal their criminal activities, and publicly falsely accusing of criminality and ties to criminal organizations and the mafia anyone who in any way pointed out their activities or sought any accountability.

From the above, especially considering that the commission of the criminal offenses charged in this complaint must have been the result of the actions of several persons, where each accused had a predetermined or determinable task, that the organization's activities were planned for a long or indefinite period, that the organization's operations are based on applying rules of internal control and discipline of its members, that intimidation and threats are applied against anyone who calls them to account, and that there is influence of the criminal organization on the political authorities, the media, and the legislative and executive branches through members of the criminal organization who are part of legislative and executive powers, as well as the fact that the accused continue to objectively show an intent to continue all abuses, intimidation, and threats from positions of power while leading the repressive apparatus and returning favors to other criminal organizations that bought votes on their behalf, there is a well-founded suspicion that this also constitutes the criminal offense of creating a criminal organization under Article 401a of the

Criminal Code, as well as criminal offenses that fall under organized crime and high-level corruption, where organized crime, through the accused, infiltrated the executive branch—specifically the security sector—as well as the legislative branch, where through the accused Bogdanović there is access to all classified information.

Namely, the listed conditions fully correspond to the act of the criminal offense under Article 401a of the Criminal Code of Montenegro, but also to the conceptual definition of organized crime by the European Union Working Group from 1994, which is also accepted by the European Court of Human Rights. Accordingly, this criminal complaint is being submitted for further proceedings to the Special Prosecutor's Office for Organized Crime.

There is well-founded suspicion that this criminal organization and its members committed several other criminal offenses to the detriment of the state budget, but that will be the subject of a separate criminal complaint, since the willingness of the accused to apply intimidation methods daily and publicly threaten everyone who criticizes them requires urgent action by this prosecution in response to this criminal complaint, in order to protect the safety of the victims and prevent the commission of new criminal offenses.

The criminal offense of abuse of official position is committed by an official who, by unlawfully exploiting their official position or authority, exceeding the limits of their official authority, or failing to perform their official duty, obtains benefit for themselves or another, causes harm to another, or seriously violates the rights of another. Thus, this offense can appear in three forms: exploitation of official position or authority; exceeding the limits of official authority; and failure to perform official duty.

Article 24, paragraph 1, of the Criminal Code of Montenegro prescribes that anyone who intentionally incites another to commit a criminal offense shall be punished as if they had committed the offense themselves. Incitement thus intentionally influences another's will and can be carried out in two ways: by provoking or creating the will to commit a criminal offense, or by strengthening the decision of another to commit a criminal offense.

Article 25, paragraph 1 of the Criminal Code of Montenegro prescribes that anyone who intentionally assists another person in committing a criminal offense shall be punished as if they committed the offense themselves, although a lesser punishment may be applied. Paragraph 2 of the same article stipulates that assistance in committing a criminal offense particularly includes: giving advice or instructions on how to commit the criminal offense, providing the perpetrator with means to commit the criminal offense, creating conditions or removing obstacles for the commission of the criminal offense, as well as promised concealment of the criminal offense, the perpetrator, the means used to commit the offense, traces of the offense, or objects obtained through the criminal offense.

The accused Šaranović, Šćepanović, and unidentified persons — members of the Commission for Verification of Security Disruptions in Police Operations and police officers who entered operational data into the system — abused their official position and official authority, exceeded the limits of their official authority by selectively initiating procedures to verify security disruptions, entering false, unverified, and unconfirmed data into the “InfostreamV2” application

marked as intelligence project “Badge,” in order to selectively accuse police officers chosen by the accused’s criminal organization of connections with organized criminal groups and terrorists. In most or all cases, they did this without obtaining the mandatory opinion of the National Security Agency, illegally marking that data with a confidentiality classification, denying the accused police officers the right to respond to the accusations, and publicly accusing all police officers subject to these procedures, as well as their lawyers, civil sector activists, and certain media, of being members and protectors of criminal organizations.

The reported political party “Democrats” and the accused Bečić, Bogdanović, and Vojinović incited and assisted the accused Šaranović, Šćepanović, and unidentified persons — members of the Commission for Verification of Security Disruptions in Police Operations and police officers entering operational data — by provoking and creating a will in them to undertake criminal acts, as well as giving advice and instructions on how to commit those criminal offenses, promising beforehand to conceal the criminal offenses and the means by which the offenses are committed, traces of the offense, and objects obtained by the criminal offenses, by publicly accusing anyone who exposes their crimes and works on their prosecution from their positions.

The criminal offense of falsification of an official document is committed by an official who enters false data or omits an important data in an official document, book, or record, or certifies an official document, book, or record with their signature or official stamp containing false content, or by their signature or official stamp enables the creation of official documents, books, or records with false content. Article 142, paragraph 29 of the Criminal Code prescribes that a document is considered any object suitable or intended to serve as evidence of any fact that is significant for legal relations, including computerized data.

The unidentified persons — police officers who, as part of the criminal organization, were tasked with entering operational data relevant to verifying security disruptions into the “InfostreamV2” application marked as intelligence project “Badge” — entered false, unverified, and unconfirmed operational information in the absence of the mandatory opinion of the National Security Agency, which served as accusations against police officers selected by the criminal organization of which the accused are members.

The criminal offense of endangering safety is committed by anyone who threatens to attack the life or body of a person or their close relative. A more serious — qualified form of this offense exists when committed against a person performing public duties in connection with those duties. According to Article 142, paragraph 32 of the Criminal Code, a public duty is the performance of a profession or duty associated with an increased risk to the safety of the person performing it and in the field of legal assistance before courts and other state bodies. According to Article 21, paragraph 2 of the Constitution of Montenegro, legal assistance is provided by the Bar Association, and pursuant to Articles 2 and 3 of the Law on the Bar Association, the Bar is an independent and autonomous service that provides legal assistance to individuals and legal entities. Legal assistance includes:

1. Providing legal advice and opinions;
2. Drafting complaints, appeals, petitions, representations, and other submissions;
3. Drafting contracts, wills, statements, general and individual acts, and other documents;

4. Representing and defending individuals and legal entities before courts and other state bodies, companies, and other legal persons;
5. Representing individuals and legal entities in their legal affairs;
6. Performing other legal assistance tasks on behalf of and for the account of individuals or legal entities, on the basis of which those persons exercise some right.

The reported political party “Democrats” and the accused Bogdanović and Vojinović endangered the safety of the complainants and representatives of the civil sector who pointed out their illegal conduct and abuses in public statements by associating them with organized criminal groups, portraying them as protectors of organized crime and the mafia, and as an alleged group united to prevent so-called vetting. At the same time, the same accused endangered the safety of the complainants’ lawyers in connection with their legal work through similar threats, while the accused Vojinović further endangered the safety of the complainants’ lawyers in connection with their legal work by threatening that the lawyer would face a “chopping” and would “cry,” which, according to the provisions of the Criminal Code, is considered a job of public importance.

From the above, there is reasonable suspicion that the accused committed the criminal offenses charged against them by this complaint. Therefore, we propose that the Special State Prosecutor’s Office, in accordance with the authorities and obligations prescribed by Article 16, paragraph 1; Article 18, paragraph 2; Article 19; Article 44 of the Criminal Procedure Code, as well as Articles 5, 11, and 12 of the Law on Confiscation of Property Acquired by Criminal Activity:

- Truthfully and fully establish the facts relevant for making a lawful and fair decision,
- Examine with equal care and establish facts that incriminate the accused as well as those in their favor, especially to investigate and determine which officials — police officers — for an extended period entered false and unverified operational data into the “InfostreamV2” application marked as intelligence project “Badge,”
- Truthfully and fully establish the connections of the criminal organization and the accused with other criminal organizations whose members, according to published SKY communication correspondences, purchased votes on behalf of the accused here,
- Truthfully and fully determine what the accused and their criminal organization gave as consideration to other criminal organizations in exchange for buying votes on their behalf,
- Initiate criminal proceedings and prosecute the accused, as well as all persons who participated in the commission of the reported or other criminal offenses to the detriment of the state budget and multiple police officers,
- Issue orders and direct and coordinate police actions to establish facts important for making a lawful decision, with special caution that these actions are not carried out by subordinates of the accused or members of the criminal organization,
- Initiate an inquiry and undertake urgent evidentiary actions,
- Initiate and conduct an investigation,
- Discover property benefits acquired through the commission of criminal offenses,
- Initiate financial investigations against the accused.

Also, in accordance with the mentioned legal authorities and obligations, we propose that the Special Prosecutor’s Office:

- Hear the accused regarding the circumstances stated in this criminal complaint,
- Hear police officers who participated in any way in activities related to conducting security checks,
- Identify, hear, and initiate proceedings against all persons who participated in undertaking actions to commit criminal offenses,
- Undertake all other necessary actions to make a lawful and fair decision.

From the above, there is reasonable suspicion that the accused fulfilled all essential elements of the criminal offenses charged against them by this complaint, so we hereby submit the complaint with proposed evidence for further proceedings and propose that you carry out the previously mentioned actions and gather all necessary evidence relevant for determining guilt and identifying all persons responsible for the criminal offenses charged by this criminal complaint to the detriment of the state budget, multiple police officers, and possibly other criminal offenses within the same criminal organization.

For the complainants, attorney-in-fact:  
Veselin D. Radulović, lawyer from Podgorica

Attachment:

- Power of attorney