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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 hereby submit the following:

**CRIMINAL COMPLAINT**

Against:

1. The political party "Democrats – Democratic Montenegro," with headquarters in Podgorica, 8. Marta Street, No. 72
2. Danilo Šaranović, Minister of Internal Affairs in the Government of Montenegro
3. Several unidentified persons – employees of the Ministry of Internal Affairs involved in the public procurement procedure
4. Officials – responsible persons in CEDIS, members of the political party "Democrats – Democratic Montenegro"

for 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 over an extended period 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 in connection with public procurement over an extended period under Article 272c, paragraph 5 in connection with paragraphs 1, 2, and 3, in connection with Article 49, paragraph 1 of the Criminal Code of Montenegro; in concurrence with the criminal offense of unauthorized collection and use of personal data over an extended period under Article 176, paragraph 4 in connection with paragraphs 1 and 2, in connection with Article 49, paragraph 1 of the Criminal Code of Montenegro; in concurrence with the criminal offense of violation of labor rights over an extended period under Article 224, paragraph 1 in connection with Article 49, paragraph 1 of the Criminal Code of Montenegro.

Because they:

from the end of October 2023 until the date of filing this criminal complaint, fully aware of their actions and having intended to carry them out, they became members of a criminal organization that was organized—on an as-yet undetermined date after 2020—by an unidentified person (possibly one of the reported members of the political party “Democrats – Democratic Montenegro”). This organization had the aim of committing criminal offenses punishable by a prison sentence of four years or more, for the purpose of gaining unlawful profit and power for the benefit of the political party “Democrats – Democratic Montenegro” and other reported individuals, to the detriment of the state budget. Each member of the organization had a pre-assigned or assignable role; the organization's activity was planned to last for an extended or indefinite period; its functioning was based on the application of internal control rules and discipline among members; and the criminal organization exerted influence over political power, public media, and both the legislative and executive branches of government,

- Thus, the reported political party "Democrats – Democratic Montenegro" had the role and task, within the criminal organization, of proposing the reported Šaranović for a position in the security sector after the division of ministries in the Government of Montenegro. His role would be to abuse his official position, i.e., to exploit and exceed his official powers and engage in abuses related to public procurement, in order to gain unlawful profit for the benefit of the political party, other reported individuals, and entities in whose favor illegal decisions would be made, while simultaneously causing damage to the state budget.
- The reported political party "Democrats – Democratic Montenegro", within the criminal organization, also had the role and task of, following the allocation of ministries in the Government of Montenegro and the earlier political division of functions in other sectors, appointing its officials to the energy sector – specifically, the state-owned company CEDIS. These officials then abused their official positions and exceeded their powers, unlawfully spending entrusted funds, and illegally failed to ensure equal access to employment for unemployed individuals, thereby discriminating against job seekers and denying or restricting their rights. They employed individuals who support the political party based on internal transfer agreements and without a public job announcement.
- The reported Danilo Šaranović, within the criminal organization, had the role and task of, after being appointed Minister of Internal Affairs, abusing his official position and exceeding his powers by, acting together with other reported persons subordinate to him in the Ministry, unlawfully conducting a public procurement procedure for vehicles for the needs of the Police Directorate. In coordination with representatives of the company "AUTO ČAČAK", he allegedly tailored the procurement conditions to suit that company, and concluded a contract based on their offer, which was contrary to the tender documentation, i.e., improperly prepared and should have been rejected—all with the aim of delivering pre-arranged stock of Škoda Scala vehicles to the Ministry of Internal Affairs. Furthermore, during and after the procurement, he allegedly concealed the commission of the criminal offense, its traces and evidence, by promoting the use of both Cyrillic and Latin script on the cars' labels as the most important feature of the official vehicles, rather than their technical performance.
- The reported Danilo Šaranović, within the criminal organization, had the role and task that, after being appointed Minister of Internal Affairs, he would abuse his official position and exceed his official powers by carrying out an experimental procedure for installing a stationary radar in Podgorica without a public tender and secretly, entrusting the job to the company with very questionable references, “MMSCODE” from Banja Luka, closely

connected to the family of the former President of the Republika Srpska, Milorad Dodik. Together with other reported persons, he enabled the acceptance of an offer from the letter of intent of this company for the loan of equipment for a period of 90 days to familiarize themselves with the system's concept regarding data processing, photo and video extraction, and other technical characteristics. Then, contrary to Article 9, paragraph 1, point 2 of the Law on Personal Data Protection, the reported persons processed and used personal data unlawfully, i.e., they collected, processed, and used personal data illegally and disclosed or made them available to others—including foreign nationals and companies.

- The reported unidentified officials of the Ministry of Internal Affairs and Police Administration, within the criminal organization, had the roles and tasks to prepare tender documentation and conduct procedures to ensure a pre-arranged decision to select the offer of the company "AUTO ČAČAK", which was defective and should have been rejected, and to unlawfully conclude a contract with that company and procure pre-prepared stock vehicles.
- The reported unidentified officials of the Ministry of Internal Affairs and Police Administration, within the criminal organization, had roles and tasks to take actions so that the experimental procedure for installing the stationary radar in Podgorica was carried out secretly, without a public call; to entrust the job to the company with very questionable references "MMSCODE" from Banja Luka; to enable acceptance of the offer from the letter of intent of this company for the loan of equipment for 90 days to familiarize themselves with the system's concept regarding data processing, photo and video extraction, and other technical characteristics; and then, contrary to Article 9, paragraph 1, point 2 of the Law on Personal Data Protection, to process and use personal data unlawfully, i.e., to collect, process, and use personal data illegally and disclose or make them available to others—including foreign nationals and companies.
- Several currently unidentified officials of the political party "Democrats – Democratic Montenegro", within the criminal organization, had the role and task that after being elected and appointed in the energy sector—state-owned company CEDIS—they abused their official positions, exceeded their powers, unlawfully spent entrusted funds, and unlawfully employed individuals who support that political party. They knowingly failed to comply with laws or other regulations, collective agreements, and other general acts concerning labor rights and, in this way, denied and restricted others' rights to which they were entitled.

### E x p l a n a t i o n

At the end of October 2023, the current Government of Montenegro was elected, in which the reported individual, Šaranović, was appointed Minister of Internal Affairs. Immediately after his appointment, all the reported individuals began taking actions aimed at implementing a criminal plan for the Ministry of Internal Affairs (MIA) to conclude a contract with the company "AUTO ČAČAK" from Čačak, or rather its branch in Podgorica, for the procurement of vehicles for the needs of the Police Directorate.

Accordingly, on March 15, 2024, Šaranović, in the name and on behalf of the Ministry of Internal Affairs, initiated a public procurement procedure. The documentation reveals that the procurement requested 75 patrol vehicles of M1 category, with the condition that the vehicles would be returned to the leasing provider after all installments were paid, with a total lease value

of €1,867,500 excluding VAT. The second item requested the procurement of 22 patrol vehicles of M1G category, for which the leasing cost was projected at €611,838.84. Two companies submitted bids in the tender: “Osmanagić” d.o.o. from Podgorica and “AUTO ČAČAK Podgorica”. As part of the execution of the prearranged criminal plan, Šaranović selected the bid from “AUTO ČAČAK”, a decision against which the other bidder filed a complaint with the Commission for Public Procurement Procedures. Following the Commission’s recommendation, Šaranović annulled the tender for vehicle procurement on May 10, 2024. The Commission’s position was that the bidder “AUTO ČAČAK” should have been excluded from the tender process because their bid was defective, specifically due to the failure to submit a valid declaration from a legal entity registered in the Central Registry of Business Entities.

EVIDENCE: Documentation from the Ministry of Internal Affairs regarding the vehicle procurement process for the Police Directorate, to be obtained through official channels.

After that, persisting in the execution of the criminal plan to unlawfully conclude a contract with the company “AUTO ČAČAK”, the reported Šaranović initiated a new negotiated procedure without prior publication of a public invitation to tender on May 23, 2024, and once again invited the same two companies that had previously submitted bids to the canceled public tender from March of the previous year.

In the repeated procedure, the reported parties, persistent in their intention to carry out the criminal plan, once again, on June 4, 2024, made the same decision, selecting the offer from “AUTO ČAČAK”, against which the other bidder again lodged a complaint. The Commission for the Conduct of Public Procurement Procedures upheld the complaint and once again determined that the bid from “AUTO ČAČAK” was invalid in the section “Conditions of ability of a business entity”. The Commission emphasized that, under Article 108, point 5 of the Law on Public Procurement, the contracting authority is obliged to exclude an economic operator from the public procurement procedure if it determines that the required declaration was not submitted, or that the submitted declaration does not contain the information and data required by the tender documentation, or if it was improperly prepared. The Commission also referred to Article 111 of the same law, which stipulates that the applicant for qualification must submit a declaration by the economic operator guaranteeing that, throughout the duration of the procurement procedure and the execution of the contract, they will meet all the conditions for participation and that no grounds for exclusion exist. The Commission emphasized that it is undisputed that this constitutes a mandatory ground for exclusion of this bidder from the public procurement procedure in question.

EVIDENCE: Documentation from the Ministry of Internal Affairs regarding the vehicle procurement for the needs of the Police Directorate, to be obtained through official channels

Decision of the Commission for the Conduct of Public Procurement Procedures,  
to be obtained through official channels

Therefore, although Article 108, point 5 of the Law on Public Procurement clearly provided a legal basis to exclude the bidder “AUTO ČAČAK Podgorica” from the procurement procedure, the reported Šaranović initially annulled the procurement when the Commission pointed out that the first offer from this company was invalid, and then, in the new procedure, once again accepted a defective offer and ultimately concluded a contract with “AUTO ČAČAK Podgorica”.

In the Anti-Corruption Strategy (2024–2028), public procurement has been identified as a priority area—an area of particular corruption risk. Despite this, the reported individuals, using their influence over the executive and legislative branches, managed to secure as much as €130 million in the 2025 budget for the Ministry of Internal Affairs.

The fact that the company “Auto-Čačak Podgorica” delivered 75 vehicles twice within about ten days, exactly as specified in the tender documentation—that is, the company had in stock the precise number and specifications of required vehicles—as well as the fact that another ministry managed by the same political party, the reported “Democrats”, specifically the Ministry of Defence, also purchased vehicles through similar procedures and from the same supplier, “Auto Čačak”, strongly indicates a pre-arranged deal and the commission of criminal offenses with elements of high-level corruption.

Additionally, the vehicles in question have very small engine capacity, very low power output, and low torque, making them vehicles with very poor performance, especially for the needs of the Police Directorate. This fact, along with the fact that the Škoda model in question is one of the least sold models, not just in the region but in general, suggests that the procurement was manipulated to benefit the supplier, to the detriment of the state budget.

In an apparent attempt to cover up the commission of these criminal offenses, the reported Šaranović and others organized a police parade of “Škoda” in Podgorica on July 6, 2024, publicly boasting about the major procurement of 75 police vehicles. Instead of explaining the procurement process and presenting the vehicles’ performance—important for improving police effectiveness—Šaranović emphasized that, for the first time in the history of the Montenegrin police, the vehicles would bear inscriptions in both Latin and Cyrillic script.

Similarly, seven years earlier in Belgrade, Serbia’s Ministry of Internal Affairs proudly and with great media fanfare presented the purchase of over 700 Škoda vehicles from the same company, “Auto Čačak,” which were parked in front of the Palace of Serbia and then paraded through the streets.

This is significant because the owner of “AUTO ČAČAK” is Milenko Kostić, known as “Kole.” The company is the general importer of Škoda vehicles, and its revenues have skyrocketed in recent years. Serbian media have for years reported that “AUTO ČAČAK” is linked to the ruling Serbian Progressive Party (SNS) and that it earns substantial income from state institutions due to its close ties with ruling officials, including the party leader, with whom the reported individuals have maintained close political relations for years.

This same company has, in previous years, also been the main vehicle supplier in Republika Srpska, the entity of Bosnia and Herzegovina. Therefore, the monopoly this company holds in Serbia and Republika Srpska, and the way its bid was unlawfully accepted in Montenegro by individuals who are political allies and friends of the governments in Serbia and Republika Srpska, gives rise to reasonable suspicion that this is not merely political cooperation but rather a pre-arranged high-level corruption scheme.

The reported Šaranović and others, through a negotiated procedure without prior public invitation, specifically sought a bid from this company for vehicles with extremely poor specifications, unsuitable for police needs, poor-selling models already available in the company’s stock. They requested a bid from a company whose revenues from state contracts in Serbia continue to rise due to its proximity to the ruling political party—a party with which the reported individuals closely cooperate—and ultimately unlawfully accepted an invalid offer, thereby enabling that company’s business expansion into Montenegro.

That the vehicle procurement for the Police Directorate is not the only case of questionable public procurement under the organization and implementation of the reported individuals is also evident from the three-month experimental installation of a stationary radar in Podgorica. This contract

was awarded without public tender to a company from Banja Luka, "MMSCODE." In September of last year, the Ministry of Internal Affairs publicly announced that the radar device "Ekin Spotter G2", owned by MMSCODE, was installed at the intersection near the Faculty of Law in Podgorica.

EVIDENCE: Public statement by the Ministry of Internal Affairs published in the media, available at: <https://www.vijesti.me/vijesti/drustvo/725592/mup-radarski-uredjaj-instaliran-u-podgorici-na-raskrsnici-ulica-jovana-tomasevica-i-13-jula>

However, no public information is available regarding how and based on what criteria the specific company from Banja Luka was selected to install and test the radar system in Podgorica, nor whether other manufacturers were interested in this project.

On September 9, 2024, the Ministry of Internal Affairs, in letter no. 06-125-9004-1/24, merely informed the Agency for Personal Data Protection and Free Access to Information about the installation of a stationary radar at the intersection of Jovana Tomaševića Street and 13. jula Street in Podgorica.

The letter states that the Ministry, with the aim of reducing the number of traffic accidents and creating conditions for the adequate application of penal policy toward offenders, formed a Working Group involved in the procurement of stationary radar systems, and that a "certain company from Banja Luka" submitted a letter of intent to provide the equipment free of charge for a period of 90 days, so that the Ministry could become familiar with the concept of system implementation.

EVIDENCE: Letter from the Ministry of Internal Affairs to the Agency for Personal Data Protection and Free Access to Information, no. 06-125-9004-1/24 dated September 9, 2024, to be obtained through official channels.

However, despite the fact that the stationary radar was being used for testing purposes, the reported individuals were obligated, under Article 9, Paragraph 1, Point 2, in conjunction with Article 2 of the Law on Personal Data Protection, to process the collected data fairly and lawfully, only to the extent necessary to achieve the purpose of the processing, and not in a manner inconsistent with its intended use. Moreover, the Agency for Personal Data Protection and Free Access to Information indicated that, before returning the equipment, all collected personal data must be destroyed or deleted, in order to ensure that such data is not made available to the equipment provider. A record of this action must be created and submitted for the Agency's review.

EVIDENCE: Documentation from the Ministry of Internal Affairs related to the installation of the stationary radar in Podgorica and the selection of the company "MMSCODE" from Banja Luka, to be obtained through official channels.

The reported individuals did not act in accordance with the cited legal provisions and processed citizens' personal data unlawfully. There is reasonable suspicion that the collected personal data was not destroyed and that it was provided to the equipment supplier from another country. Given that the stationary radar was located in central Podgorica, near security-sensitive facilities—namely, the Basic Court, the Ministry of Defence, and the Special Police Unit offices—there is a risk that the recordings and all data collected from those locations during the minimum 90-day period became accessible to unauthorized persons, including foreign nationals.

The reported individuals secretly and without a public tender engaged the mentioned company in a manner that raises reasonable suspicion of a corrupt, pre-arranged deal. The company in question was founded by Slavko Bojić, a close friend of Igor Dodik, son of former President of Republika Srpska, Milorad Dodik. Due to a “COVID contract” in 2021, an investigation was launched against Bojić in Bosnia and Herzegovina, which is why he formally sold his ownership in the company in 2022 to local businessman Dragan Ćelić.

According to media reports in Bosnia and Herzegovina, this company concluded a similar deal under suspicious circumstances in Republika Srpska. Specifically, the companies “InnovaTraffic Holding” from Germany, “Ekin Teknoloji San. Ve Tic. A.S.” from Turkey, and “WKB Consulting” from Banja Luka won a tender for the procurement and installation of a radar system in Republika Srpska. Under a public-private partnership, these companies will split all revenue from collected fines 50/50 with the Ministry of Internal Affairs of Republika Srpska. Conditions were previously created for the public-private partnership to go to Slavko Bojić, owner of “ProControl”, co-owner of “MMSCODE”, and the person behind “InnovaTraffic Holding” from Germany.

EVIDENCE: Article published at: <https://6yka.com/bih/kako-su-firme-kontroverznog-biznismena-slavka-bojica-pripremale-milionski-posao-sa-radarima-u-rs/>

The experimental period of radar use served as an opportunity for Danilo Šaranović, one of the accused, to announce before the Security Committee of the Parliament of Montenegro that the analysis had shown that the test radar had, in just three days, recorded violations totaling 70,000 euros in fines—which, according to him, proved the justification and cost-effectiveness of the project. Given the suspicion that the criminal group of the accused planned to conclude a deal in the same manner as this company had done in Republika Srpska, it follows that the test radar was installed only to estimate the revenue potential, and not with the goal of improving traffic safety in Montenegro, but rather to unlawfully acquire financial gain, following the same criminal model previously used in Republika Srpska.

Meanwhile, as the accused were working to implement their criminal plan aimed at gaining financial benefit and political power for the criminal organization to which they belong, traffic safety in Montenegro worsened year after year, and there has been a disturbing rise in the number of traffic fatalities.

Furthermore, the responsible individuals at CEDIS—who are members of the political party “Demokrate Demokratska Crna Gora”, and also members of the same criminal organization—implemented the joint criminal plan by abusing their official positions and exceeding their legal authority through unlawful use of entrusted funds and unlawful employment of persons who support that political party.

At the initiative of BIRN Montenegro, the State Audit Institution (DRI) conducted an audit of CEDIS’s operations, which had already been carried out in 2024, and the company received a double negative opinion.

EVIDENCE: Article published at: <https://mina.news/mina-business-ekonomske-vijesti-iz-crne-gore/dri-dala-duplo-negativno-misljenje-za-cedis/>

DRI Audit Report on CEDIS operations – to be obtained through official channels

According to the State Audit Institution (SAI) report, the company CEDIS employed a significant number of people—an average of 247 individuals monthly—based on agreements for the transfer of employees from agencies, business entities, state authorities, and state and local companies,

without issuing a public job announcement. Because of this, the SAI advised CEDIS to ensure equal access to employment opportunities for unemployed individuals and to limit the potential for discrimination against job seekers. The SAI also noted that agency services for temporary employee assignment should only be used for positions that require temporary work. In doing so, the responsible individuals in CEDIS knowingly failed to comply with laws or regulations, collective agreements, and general acts regarding labor rights, thereby denying and limiting others' rights.

There is reasonable suspicion that the political party "Democrats" similarly engaged its own officials, who also became members of the same criminal organization, and who had roles and tasks in other state-owned companies where they abused their official positions, exceeded their authority, illegally spent public funds, unlawfully hired party members, and denied rights to everyone else. Therefore, I propose that the Prosecutor's Office take proactive steps in that direction.

From the allegations in this criminal complaint, the prolonged actions of the accused, and the supporting evidence, it arises that the criminal organization of which the accused became members was established for the purpose of committing criminal offenses, and that its members engage in such offenses to achieve the goals of the organization, namely, illicit financial gain and political power. Furthermore, the accused used their positions and influence within the security sector to avoid detection and prosecution of the crimes they committed.

Given all the above, and especially the fact that the offenses described in this complaint required coordinated action by multiple individuals, each with a predefined or definable task, that the organization's activities were planned for the long term or indefinitely, that the organization operated under internal control and discipline rules, and that there was influence over political power, media, and legislative and executive authorities through members of the criminal organization embedded within those institutions, it is clear that there is reasonable suspicion of the criminal offense of forming a criminal organization, under Article 401a of the Criminal Code of Montenegro.

This case falls under the scope of organized crime and high-level corruption, where the criminal organization has infiltrated the executive branch, especially the security sector, and the legislative branch through members of the political party "Democrats".

Namely, all the elements of the criminal offense under Article 401a of the Criminal Code are present, and also match the definition of organized crime as adopted by the 1994 EU Working Group and accepted by the European Court of Human Rights.

In line with the above, this criminal complaint is submitted to the Special Prosecutor's Office for Organized Crime.

Therefore, it follows that there is reasonable suspicion that the accused have committed the criminal offenses listed in this complaint. I propose that the Special State Prosecutor's Office, in accordance with its authorities and obligations under Articles 16(1), 18(2), 19, and 44 of the Criminal Procedure Code, as well as Articles 5, 11, and 12 of the Law on Seizure of Assets Acquired through Criminal Activity, shall:

- Truthfully and fully establish the facts relevant to a lawful and fair decision,
- Examine and determine with equal care the facts against and in favor of the accused, especially facts concerning the connection between the criminal organization and the accused with companies and individuals from other countries, on whose behalf the



accused acted, and verify whether the organization operated internationally and whether the accused are merely a branch of a larger transnational criminal network,

- Initiate criminal proceedings and prosecute the accused and all individuals involved in the crimes described or other offenses damaging to the state budget,
- Issue orders, direct and supervise police actions to establish facts essential for a legal decision—especially ensuring these actions are not conducted by subordinates of the accused or members of the criminal organization,
- Initiate preliminary investigation and take urgent evidentiary actions,
- Launch and conduct a full investigation,
- Identify illicit assets obtained through the commission of crimes,
- Initiate a financial investigation against the accused, especially against the political party involved.

Additionally, in line with the above legal authorities and obligations, I propose that the Special Prosecutor's Office:

- Interrogate the accused regarding the allegations in this criminal complaint,
- Interrogate other individuals with knowledge of the described actions,
- Identify, interrogate, and prosecute all other persons who participated in the commission of these or related criminal offenses,
- Undertake all necessary actions to make a lawful and fair decision.

From all of the above, there is reasonable suspicion that the accused have fulfilled all essential elements of the criminal offenses alleged in this complaint. Therefore, I am submitting this complaint along with the proposed evidence for further action and recommend that all measures listed above be carried out, and that all necessary evidence be obtained to determine guilt and identify all individuals responsible for the criminal acts charged in this complaint—acts which harmed the state budget and may include other crimes committed within the same criminal organization.

On September 25, 2025, acting under authorization from police officers, I also submitted another criminal complaint for different offenses within the same criminal organization, and I expect this Prosecutor's Office to handle these complaints with particular diligence, and to examine whether additional offenses under its jurisdiction have been committed within the same criminal group, considering the influence this criminal organization and its members have over the executive and legislative branches.

Complainant:  
Veselin D. Radulović, attorney from Podgorica