THE ROLE OF THE POLICE OF MONTENEGRO IN COMBATING FAN HOOLIGANISM

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Abstract
In recent years, hooligan incidents in Montenegro have become more frequent and violent. Hooliganism at sports events is becoming recognized as a serious problem by citizens, legislators, and other state institutions. Violence at sports events in Montenegro exists, but it still does not represent a major security problem. States deal with this security problem in different ways, primarily by passing appropriate regulations, but in solving this problem in all states, the police seem to play a primary role. In recent years, we have witnessed a proactive approach by the police to this problem. This is precisely where the lack of the Montenegrin police, which has good police units that act repressively on hooligan outbursts, can be seen. However, the Montenegrin police do not have narrowly specialized units dealing exclusively with this problem, which will collect and exchange information about hooligans, as well as the National Office for the Exchange of Information on the Security of Football Competitions (NFIP), which is a prerequisite for the establishment and successful international cooperation in this field. The research presented and analyzed statistical data in the period 2018-2021, which refers to the actions of the Montenegrin police during the security of public gatherings, especially sports events. Based on them, it can be concluded that the Montenegrin police play a significant role in opposing fan hooliganism. Members of the police in Montenegro are adequately prepared to oppose fan hooliganism, as far as repressive actions are concerned. All of the above instills confidence in citizens that the police of Montenegro will succeed, together with other state bodies, in adequately opposing fan hooliganism.

Keywords: hooliganism, role, fans, police, Montenegro

1. INTRODUCTION

Today, one can find a large amount of research on the violence of extreme fans in the narrowest sense of the word. However, such a case is not in the scientific literature in Montenegro. In particular, there is no research on topics that are indirectly related to hooliganism, such as the political abuse of sports, the association of neo-fascist (political) groups with extreme fan groups, the criminal activities of fan leaders and their connections with organized criminal groups, or the participation of fans in public gatherings which do not have a sporting character (Otašević, 2016). Is there a need for such research, or is this problem present in Montenegro?
Perhaps the best answer to this question can be given by the citizens of Montenegro. The question arises whether the citizens of Montenegro believe that they are threatened by violence at sports events, that is, whether it is a problem for the state. According to the results of a survey conducted in 2020 (OSCE Mission in Montenegro, 2020), citizens believed that the biggest threat to the security of Montenegro is the drug trade. Cumulatively, 92% of respondents claimed this (72.4% considered it a big problem, and an additional 19.6% considered it somewhat of a problem). After the drug trade, citizens pointed out that the biggest problems are corruption (89.9%) and organized crime (89.6%). On the penultimate place in the list of threats to the security of Montenegro, according to citizens, is violence at sports events (34.9% of respondents; 15.7% said that it is a big problem, and 19.2% that it is somewhat of a problem), while terrorism is also violent extremism (28.9%) in the last place on the list, which is almost the same situation as in the survey from 2019 (OSCE Mission in Montenegro, 2020). From everything presented, the citizens of Montenegro perceive that Montenegro has a problem with violence at sports events, but they do not perceive it as a major security problem.

States are dealing with this security problem in different ways. Legal systems try to provide appropriate responses to this negative phenomenon. First of all, by adopting special laws that are exclusively intended to suppress hooliganism at sports competitions, determining criminal acts and misdemeanours, sanctions and the manner of their implementation. (Otašević & Janković, 2021). That is how Montenegro passed the Law on Prevention of Violence and Misbehavior at Sports Events (2017), which establishes the rules for behavior at sports events, and penalties for violating them, as well as the powers of the police when securing sports events. Also, in 03.07.2016 Montenegro signed a new Council of Europe convention related to security at sports events, the Convention on an integrated approach to security, safety and services at football matches and other sports events, but has not yet ratified it (Council of Europe).

Hooliganism at sporting events has received considerable attention from sociologists and anthropologists, who analyze its cultural aspects (Kossakowski, 2017), and the police, who consider how to prevent and control it. (Albrecht, Dow, Plecas, & Das, 2014). However, in solving this problem in all countries, the police seem to play a primary role (Janković, Otašević, Mašić, & Spasić, 2021; Milojević & Janković, 2012). However, modern police tactics are no longer based only on repressive measures, but a new proactive approach to this problem is based on intelligence, risk assessment, deployment of police units based on risk assessment, proportional police intervention, dialogue with fans, collection of evidence of criminal activities fans and exchange of collected evidence with criminal prosecution authorities (Milojević & Janković, 2022; Milojević, Janković, & Otašević, 2019). The question arises whether this is also the case with Montenegro.

2. HOOLIGANISM IN MONTENEGRO

In Montenegro, ethnicity is the deciding factor for club affiliation. Montenegrins support local teams, while Serbian clubs such as FC Red Star and FC Partizan enjoy the support of ethnic Serbs. In the Bosniak-dominated cities of Rozaje and Plav, the ultras groups Gazije and Hajvani support local clubs, while in Ulcinj, where Albanians are the majority, FC Otrant-Olympic is popular (Đorđević & Scaturro, 2022). In Table 1 (Đorđević & Scaturro, 2022) an overview of the most important ultras fan groups in Montenegro which support Montenegrin clubs is provided. In addition to them, there are also a large number of fans of FC "Crvena Zvezda" - Delije and FC "Partizan" - Grobari.
### Table 1: The most important ultras fan groups of Montenegro

<table>
<thead>
<tr>
<th>Name of the group</th>
<th>Meaning of name</th>
<th>Football club</th>
<th>City</th>
</tr>
</thead>
<tbody>
<tr>
<td>FAP Machine</td>
<td>Strong Machine</td>
<td>FC Celik</td>
<td>Niksic</td>
</tr>
<tr>
<td>Gazier *</td>
<td>Warriors</td>
<td>FC Ibar</td>
<td>Roses</td>
</tr>
<tr>
<td>Animals</td>
<td>Rampages</td>
<td>FC Jezero</td>
<td>Blue</td>
</tr>
<tr>
<td>Ultras</td>
<td>—</td>
<td>FC Jedinstvo</td>
<td>Bijelo Polje</td>
</tr>
<tr>
<td>Street Boys</td>
<td>—</td>
<td>FC Berane</td>
<td>Berane</td>
</tr>
<tr>
<td>Barbarians</td>
<td>Barbarians</td>
<td>FC Buducnost</td>
<td>Podgorica</td>
</tr>
<tr>
<td>Dukes</td>
<td>Dukes</td>
<td>FC Sutjeska</td>
<td>Niksic</td>
</tr>
<tr>
<td>Devils</td>
<td>Devils</td>
<td>FC Kom</td>
<td>Podgorica</td>
</tr>
<tr>
<td>Wolves</td>
<td>Wolves</td>
<td>FC Zeta</td>
<td>Golubovci</td>
</tr>
<tr>
<td>FAP Machine</td>
<td>Strong Machine</td>
<td>FC Celik</td>
<td>Niksic</td>
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<td>Blue</td>
</tr>
</tbody>
</table>

In the research conducted by Đorđević and Scaturro (2022) about fan groups in the territory of Montenegro, it was found that some of them are connected to violence, politics and crime. Research findings indicate that all fan groups are associated with violence and that only three groups are prone to physical confrontation with the police, namely: "Street Boys", "Barbarians" and "Vojvode". Regarding the connection with crime, the findings of the research indicate that the fan groups "Devils" and "Wolves" are connected with certain criminal activities, but not with organized crime. Regarding the connection with politics, the findings indicate that three fan groups are connected to political actors, namely "Street Boys", "Barvars" and "Vojvode".

All the aforementioned fan groups participated in various hooligan outbursts, both on sports fields and at various political gatherings. They took place during the time when Montenegro was part of the former SFRY, and they continued even after the independence of Montenegro, as an independent state, until today. The main question is where did the long-forgotten "fair play" and chivalry that adorned Yugoslav and Montenegrin sports disappear in Montenegro, where did the ethical imperatives and moral values in sports disappear (Popović & Bjelica, 2013)? In order to gain insight into how fan groups participate in hooligan outbursts, we will describe some of them in the following text.

Some of the most interesting hooligan clashes involving Montenegrin fans took place in 1972 and 1983. In the first case, in 1972, FC "Budućnost" from Podgorica played against FC "Spartak" in Subotica. Because after World War II, a large number of people from Montenegro moved to Vojvodina. A large number of FC "Budućnosti" fans came from numerous places in Vojvodina to cheer on their team. Immediately after arriving in the city, the fans, who were under the influence of alcohol, fought with the local population, and the game was stopped at one point because the fans of FC "Budućnost" celebrated their team's leading goal by running onto the field and firing a cannon. weapons into the air (Delia, 2014). The delegates asked the police to disarm the fans so that the game could continue, which was done.

The next significant incident in the history of hooliganism in Montenegro took place in May 1983. Then FC "Sutjeska" from Nikšić played a decisive match for entry into the first league against FC "Dubočica" from Leskovac. Ten buses left Nikšić with fans. After arriving in Leskovac, they visited local taverns where they consumed alcoholic beverages until they left for the match. They entered the stadium by force - breaking in, without paying...
for tickets, after which the incidents continued. During the match, FC "Sutjeska" fans threw beer bottles and oysters at home fans and players. When their team scored, the fans entered the field with flags and sticks that later turned out to be used in fights. The match was played to the end, but fights continued throughout Leskovac. Montenegrin fans again used firearms and shot into the air. The exact number of people injured in these incidents is not known, but it is assumed that dozens of people are involved (Balkan fans).

After this period, no data on such significant incidents were found. However, in the past few years, the situation has changed. One of the most significant incidents took place in Bar in 2016, one hour after midnight, when a bus with Croatian football players returning from a game in North Macedonia was stoned. Then the bus windows were broken, and five football players were covered with glass, but luckily no one was injured (Večernji list, 2016).

In 2019, there were several hooligan outbursts. The first of them was the incidents at the football match between the football teams of Montenegro and England, during which the home fans used racist insults against the visiting fans. Disciplinary proceedings were initiated against the FC of Montenegro due to the use of pyrotechnics, throwing objects on the field, racist behaviour, mess, and blocked staircases (ESPN, 2019). In the same year, a bus with players from FC "Budućnost" was stoned. It is believed that the motive for the stoning was the victory of FC "Budućnost" on the away field in Nikšić against FC "Sutjeska". According to the Police Administration of Montenegro, there were no injuries in this incident (Government of Montenegro, 2019). The perpetrators were quickly found and they were four minors between the ages of 15 and 17.

In March 2022, there were major incidents between FC "Budućnost" and FC "Dečić" fans who were located in the same stand. This serious safety lapse for the result had the match stopped in the 17th minute. Chairs were broken and thrown everywhere, torches were lit and thrown into the field. After the intervention of the police, FC "Budućnost" fans ran around the field and started throwing stones on the field. On that occasion, the goalkeeper of FC "Budućnost" was also hit in the head and was slightly injured (Telegraph, 2022). In the same year, another incident took place in Budva, when a fight broke out between FC "Budućnost" fans and FC "Crvena Zvezda" fans. In this incident, one person was injured and one vehicle was destroyed. About a dozen people were detained, and all of them were under the age of 25 (News, 2022). From all the mentioned incidents, it can be seen that the most common rioters were the fans of FC "Budućnost", better known as "Barbarians".

Fan violence is not only related to sports facilities but also occurs at various public gatherings of different characters. During the 2013 "Pride Parade" in Budva, there were aggressive extreme fans from different parts of Montenegro. (Corac, 2016). By shouting obscenities, throwing various objects and constantly trying to make physical contact with the participants of the "Parade", they tried, several times, to prevent the movement of the participants and the holding of the event in general, where two LGBT people suffered minor injuries from objects thrown from the crowd. During the security of the aforementioned public gathering, 446 uniformed and operational officers of the Police Administration were engaged, as well as 5 members of the Operational Headquarters (Čorac, 2016).

Another similar event was held the same year in Podgorica. Based on the relevant information, the operational headquarters expected violent behavior from fan groups from different areas of Montenegro (Rečević, 2016). About 2,000 police officers were engaged in its security on the day of the Pride Parade. On that occasion, 21 police officers were injured from the effect of Molotov cocktails and grenades, one of whom received serious injuries. On the day of the "Pride Parade" police officers brought 70 people to the premises of CB Podgorica, and against 17 of them (including 3 minors), after consultation with the
prosecutor's office, a request was submitted to the Regional Authority for Misdemeanors in Podgorica to initiate misdemeanor proceedings, due to the well-founded suspected of having committed offences according to the Law on Public Order and Peace - insulting or insolent behavior in a public place (Article 7) and obstructing or belittling an official in the performance of official duties (Article 11) (Rečević, 2016).

A similar manifestation, called "Academic Pride Walk" was supposed to take place in September 2015 in Nikšić. The Nikšić Security Center placed a ban on the walk on the assessment that the holding of the mentioned gathering "could seriously threaten the movement and work of a large number of citizens", and that "there is a real danger that the safety of people and property will be threatened and public order and peace is threatened on a larger scale" (Prelević, 2016). The main reason for the ban on the walk was information about threats from various fan groups, according to the subsequent proceedings carried out by the Council for Civilian Control of Policing (Prelević, 2016). One of the biggest dangers that would threaten the holding of the rally were specifically the fan groups "FAP mašina" (FK "Čelik"), "Vojvode" (FK "Sutjeska"), "Varvari" (FK "Budućnost"), "Grobari" (FK "Partizan" Belgrade) and "Delije" (FK "Crvena zvezda") (Žižić, 2016). A special danger for holding a meeting there was huge and deep intolerance between the members of the "Varvari" fan group, on the one hand, and the members of the "Vojvode" and "Fap mašina" fan groups, on the other hand, so it was realistic to expect a conflict between their supporters (Žižić, 2016).

3. POLICE UNITS IN MONTENEGRO INVOLVED IN OPPOSING FAN HOOLIGANISM

In Montenegro, there are several police units that are intended, among other things, to oppose fan hooliganism. These are the Department for Public Order and Peace, Security Centers, Special Police Unit and Intervention Units.

At the central level, within the Police Sector of General Jurisdiction, there is the Department for Public Order and Peace, which deals with:

- monitoring and studying the state and manifestations of JRM,
- organizing and directing the work on the analysis and monitoring of the state of JRM,
- performing the instructional and control function of the Department and its organizational units,
- performing control and supervision according to the line of work of JRM, by providing professional assistance, and directly engaging and participating in securing public gatherings and public events with increased security risk in the establishment of a violated JRM by applying police powers and
- performing other jobs (Government of Montenegro, 2021).

On the territory of Montenegro, there are eight security centres (CB) that carry out JRM maintenance tasks at the local level, and within them there are 11 security departments (OB), 23 police stations (SP) and six police units (JP) that deal with tasks maintenance of JRM (Government of Montenegro, 2021). The largest CB in Montenegro is the CB Podgorica, and it is the only police station for the JRM. In addition to the JRM police station, it also has the OB of the police, as well as three police units called Police Unit 1, Police Unit 2 and Police Unit 3. All of them deal with the preservation of JRM in the territory of Podgorica.
However, when there is a violation of JRM on a larger scale that the aforementioned units cannot deal with on their own, but need assistance, then the Special Police Unit (PJP) from the Special Purpose Police Sector is involved. A special unit of the police carries out the tasks of establishing the violated JRM on a larger scale, as well as securing public gatherings and manifestations that are marked as the highest level of security risk. In addition, PJP deals with coordinating the work of intervention units in crisis situations and situations of violated JRM on a larger scale. (Government of Montenegro, 2021). It deals exclusively with the repressive part of this problem. The special police unit consists of different teams which are trained to act quickly and efficiently in different situations. It also has a Unit for suppressing fan hooliganism, violated JRM and securing high-risk gatherings. It also has a Cavalry Unit and a Service Dog Unit that can also be used to curb fan hooliganism.

As for the Intervention Unit, it is involved only when it comes to securing gatherings and facilities exclusively in the territory over which they have jurisdiction, that is, in the territory of whose Security Centers they are located. Also, the Intervention Units can be used to provide assistance to the Special Police Unit. They have twice a year training in this area, as well as additional courses at the Police Academy in Danilovgrad.

Finally, when all the resources of the units intended to suppress JRM on a larger scale have been exhausted, assistance in establishing and maintaining the damaged JRM on a larger scale can be provided by the Anti-Terrorist Unit (PTJ), which also belongs to the Special Purpose Police Sector. It is engaged when all the previously mentioned units cannot solve the problem, i.e., when the extent of the damaged JRM is so great that it is necessary to include more people and resources in order to bring the situation back under control.

4. TRAINING OF POLICE OFFICERS TO COMBAT HOOLIGANISM IN MONTENEGRO

The previous experience in securing high-risk sports events shows that high demands are placed on the police in terms of the degree of preparation, planning, organization, tactical preparedness and training of all its structures that participate in its realization (Velicković, 2012). Today, the police units of many European countries apply modern, proactive tactics (Cvetkovic & Ivanov, 2019; Ocal et al., 2020; Janković et al, 2023; Rina et al., 2023; Kabir et al., 2022; El Mougher & Jarour, 2022; Janković, 2022; Sergey & Gennadiy, 2022), the implementation of which requires well-educated, equipped and trained personnel. Police officers who are not adequately educated cannot identify potential dangers and cannot react appropriately in a given situation (Janković, Milojević, & Milojković, 2014). Because of the above, the police of Montenegro are trying to provide its members with additional education, so that they are ready to fulfill the assigned tasks.

After completing the course for police officers in Danilovgrad or the Criminalistics and Police University in Belgrade (Republic of Serbia), where employees of the MUP of Montenegro receive basic police knowledge, after establishing a working relationship, narrowly specialized training aimed at combating fan hooliganism is carried out. All over the world, including Montenegro, they focus on identifying hooligans, understanding the psychology of hooligans, as well as how to manage and have control over situations when there is an escalation, i.e., to use force in accordance with the legal regulations. (Ministry of Internal Affairs of Montenegro, 2022b).

Professional training of police officers to combat hooliganism takes place three times a year at the Police Academy in Danilovgrad. In addition to this mandatory
professional training, numerous seminars are also available that are held periodically, and some of them were held during 2022, namely:

- Police work on maintaining public order and peace - managing groups (7 participants),
- Provision of public gatherings with increased security risk (10 participants),
- Legal aspects and tactics of police officers in securing public gatherings and public events (88 participants in several groups),
- Application of police powers and use of means of coercion (the exact number of participants not indicated, seminar organized for several groups),
- Use of a hand spray with an irritant (20 participants)
- Operational-tactical and special police measures and actions (50 participants in several groups) (Ministry of Internal Affairs of Montenegro, 2022b).

Almost all of the aforementioned seminars were held due to the expressed need by the organizational unit of the Police Administration. An exception is the seminar "Application of police powers and use of means of coercion", which was held for more effective implementation of the new Law on Internal Affairs of Montenegro. (Ministry of Internal Affairs of Montenegro, 2022b).

All these seminars, in addition to lectures, also include demonstrations or case simulations. Some of these seminars included case study processing, while others, such as "Application of police powers and use of coercive means" and "Use of hand-held irritant spray" included practical exercises. The shortcoming of these seminars is that they are often limited to an extremely small number of people on an annual basis, such as the seminar "Police work to maintain public order and peace - managing groups" which is reserved for officers, i.e., management staff from the Special Purpose Police Sector (Ministry of Internal Affairs of Montenegro, 2022b).

5. ENGAGEMENT OF THE MONTENEGRIN POLICE IN COMBATING HOOLIGANISM IN THE PERIOD 2018-2021

Based on the collected data from the annual reports on the implementation of the Law on Public Gatherings and Public Events, prepared by the MUP of Montenegro (Police Administration, 2019, 2020, 2021, 2022) for the period 2018-2021, a graph was created that combines data on the total number of public gatherings\(^1\) and public events\(^2\) (sports events, etc.) in the territory of Montenegro.

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\(^1\) Public gathering means any peaceful gathering of more than 20 people in an open space for the purpose of expressing political, social and other beliefs and goals, protest, interests and differences.

\(^2\) A public event means a gathering organized for the purpose of generating income as part of a registered economic activity, which, considering the expected number of participants and the nature of the event, requires taking special security measures.
The largest number of public gatherings in the observed reference period was in 2020, and slightly less in 2021. On the other hand, the number of public performances decreased from 2018 to 2021. In 2018, 831 public events were recorded (Police Administration, 2019), the following year 651 (Police Administration, 2020), in 2020 that number dropped to 182 (Police Administration, 2021), which was certainly influenced by the coronavirus pandemic COVID-19, and in 2021 the recorded number of public performances was only 67 (Police Administration, 2022). What is important to note is that these numbers include reported, unreported and spontaneous gatherings and that all these public gatherings and events were secured by members of the Ministry of Interior.

In 2018, 18 "matches of increased risk" were held, of which 12 were football and 6 were basketball. Of those 12 games, only one basketball game, which was played between KK "Budućnost Voli" from Podgorica and KK "Fenerbahçe" from Istanbul (Turkey), was emphasized as having taken place without disturbing public order and peace. No data was available for other matches (Police Administration, 2019).

According to data from the Report (Police Administration, 2020), in 2019, 12 basketball and 16 football matches were held, which were marked as "matches of increased risk". The basketball match between the national teams of Montenegro and Latvia was marked as a "match of special importance" and an increased involvement of the police was requested for its security. The match passed without an incident. Out of a total of 28 matches, four matches, which were secured by the police, had incidents. One of the incidents was the racist insult of the players, at the already mentioned football match between the national teams of Montenegro and England. In the second incident, there were major riots, at the match between FC "Sutjeska" from Nikšić and FC "Budućnost" from Podgorica, when police officers were also attacked. In order to repel the attack, police officers were forced to use coercive means. Ten police officers and five fans were injured in the incident (Police Administration, 2020). In the remaining two games, fans often jumped over the fence, entered the field and used pyrotechnical means.

When the results for 2019 are mentioned, it is important to note that in the Report on work and situation in administrative areas under the jurisdiction of the MUP with an independent administrative body for 2019 (Ministry of Internal Affairs of Montenegro, 2020) somewhat more detailed information on public gatherings and their security by the police is shown. According to this document, in 2019, 2,107 violations of JRM were recorded, but no violations on a larger scale were recorded. 39 requests were submitted to initiate
misdemeanor proceedings based on the Law on Prevention of Violence and Misbehavior at Sports Events (2017). Out of the total number of realized police security, in 651 cases (39%) police officers were engaged in the security of public events (Figure 2).

![Figure 2: Realized security in 2019.](image)

The report on the implementation of the Law on Public Gatherings and Public Events in 2020 (Police Administration, 2021) was written in a shorter volume compared to previous reports, so data of importance for this year cannot be found in it. On the other hand, according to the Report on the work and situation in administrative areas under the jurisdiction of the MUP with an independent administrative body for the year 2020 (Ministry of Internal Affairs of Montenegro, 2021), 2,538 violations of JRM were registered, which is 431 more compared to the previous year, but just like in 2019, no major violations were recorded. Five (5) requests were submitted to initiate misdemeanor proceedings based on the Law on Prevention of Violence and Misbehavior at Sports Events (2017), which is incomparably less compared to the previously observed year 2019. It is also noted that the most numerous were the security of public gatherings (684) and public events (182), which required the additional engagement of police officers. The percentage representation of the executed guarantees is given in Figure 3.

![Figure 3: Realized security measures in 2020.](image)
In the Report on the Implementation of the Law on Public Gatherings and Public Events in 2021 (Police Administration, 2022) there are consolidated data on violations of public order and peace (JRM) in 2021, but no data can be found on how many of them were at matches, that is, in connection with hooliganism. For this reason, the data for 2021 are presented consolidated. Figure 4 presents the number of public gatherings where public order and peace were violated in 2021. The first thing that can be observed on the graph is that the total number of cases of violation of JRM was 21. Of that, not a single violation of JRM occurred at the reported gathering that was secured by the police, from which we can conclude that the members of the police did their job well. The highest number of JRM violations was recorded at unannounced gatherings - 16, while at spontaneous gatherings it happened in 5 situations (Police Administration, 2022).

![Figure 4: Number of public gatherings where public order and peace were disturbed in 2021](image)

The analysis of the number of offences committed in 2021 showed that the most common were offenses under the Law on Public Order and Peace, of which 109 were committed. The most common offenses that were committed were:

- Violation from Art. 12 of the Law on Public Order and Peace, on failure to act according to the orders of an authorized official, which refers to the prohibition of movement, access or staying in a certain place (57 misdemeanors);
- Violation from Art. 11 of the Law on Public Order and Peace, which talks about obstructing or belittling an official of a state body performing tasks within their jurisdiction (28 misdemeanors);
- Violation from Art. 13 of the Law on Public Order and Peace, which refers to the use of firearms or explosive devices in a public place without a permit, thereby disrupting the peace or safety of citizens (16 misdemeanors);
- Violation from Art. 7 of the Law on Public Order and Peace, which talks about insulting another person or insolent behavior in a public place (4 misdemeanors);
- Violation from Art. 10 of the Law on Public Order and Peace, which talks about inciting or provoking another person to fight (2 misdemeanors);
- Violation from Art. 6 of the Law on Public Order and Peace, which talks about disturbing citizens or endangering their safety in a public place (1 misdemeanor) and
• Violation from Art. 16 of the Law on Public Order and Peace, which refers to a legal or physical person who sets fire to objects or substances in a public place, thereby causing a disturbance or endangering the safety of citizens (Police Administration, 2022).

When we talk about criminal acts committed at public gatherings, we arrive at a number that is significantly lower than the case with misdemeanors - 15. Out of those 15 criminal acts, the largest number of criminal acts were committed from Art. 376 (attack on an official in the performance of official duties) of the Criminal Code of Montenegro (2003) and there were seven of them. This is followed by the criminal act of violent behavior (Art. 399 CC of Montenegro), which was committed five times. Three criminal acts, failure to comply with health regulations for the suppression of a dangerous infectious disease (Art. 287 of the CC of Montenegro), causing general danger (Art. 327 of the CC of Montenegro) and illegal possession of weapons and explosive substances (Art. 403 of the CC of Montenegro) were committed ones. (Police Administration, 2022).

According to the Report on the work and situation in the administrative areas under the jurisdiction of the Ministry of Internal Affairs with an independent administrative body for 2021, 2,454 violations of the JRM were recorded, which represents a slight decrease compared to 2020, and 21 requests were submitted to initiate misdemeanor proceedings under the Law on preventing violence and inappropriate behaviour at sports events, which represents a significant increase compared to the previous year.

As for the implemented police security measures, in 2021, 1,300 security measures were implemented, of which the majority were security measures for public gatherings (547) and security measures for public events (329), which can be seen in Figure 5 (Ministry of Internal Affairs of Montenegro, 2022a).

![Figure 5: Realized security in 2021.](image)

CONCLUSION

In recent years, hooligan incidents in Montenegro have become more frequent and violent. Hooliganism at sports events is becoming recognized as a serious problem by citizens, legislators, and other state institutions. Violence at sports events in Montenegro exists, but it still does not represent a major security problem, and in order for it not to become one, adequate measures must be taken.
The conducted research indicated that it is necessary for members of the police to pay extra attention to ultras hooligan groups, which have been identified on the territory of Montenegro. These groups are characterized not only by violent incidents, especially towards the police but also by their connection with politics and crime. When we talk about the connection between fan groups and organized crime, so far there has not been enough data to really confirm that connection.

In recent years, we have witnessed a proactive approach by the police to this problem. It is based on a continuous flow of accurate and timely information that allows the police to maintain control over fan behavior and prevent unwanted consequences. This is precisely where the lack of Montenegrin police can be seen. The Montenegrin police have good police units that act repressively when there are hooligan outbursts, however, there is no narrowly specialized unit that deals exclusively with this problem, which will collect and exchange information about hooligans. International police cooperation is also part of the proactive approach. A prerequisite for the establishment and successful development is the establishment of the National Offices for the Exchange of Information on the Security of Football Competitions (NFIP), which Montenegro has not yet established.

In the end, we can conclude that the police of Montenegro play a significant role in opposing fan hooliganism. Members of the police are adequately prepared to oppose fan hooliganism, as far as repressive actions are concerned. In the research itself, a large number of units dealing with this topic were presented, whose members completed a large number of trainings, courses and seminars. Also, from year to year, the results of police work in this matter have been evaluated positively by the MUP of Montenegro. All of the above instills confidence, both in citizens and fans, that in the future the police will adequately respond to upcoming challenges related to fan hooliganism.

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