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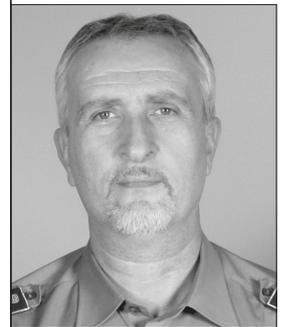
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# Between two laws – the police use of firearms from 1881–1994

In this paper, I will discuss regulations of the police use of firearms and its historical background as well as changes to and development of these regulations. In my opinion, the two dates used in the title of this study are both quite significant, as Act XXI of 1881 was the first act that applied to the metropolitan police of Budapest, while Act XXXIV of 1994 is the police act still in force. This article will not explore regulations that are currently in effect, as the investigated period is closed with the adoption of Act XXXIV of 1994. It is perhaps quite useful, however, to investigate how the regulations regarding this important means of law enforcement, the use of firearms, evolved. In order to analyse and compare the various periods concerning the police use of guns, a brief outline of the structure of the police force of the given period must be provided.



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## I. BRIEF OUTLINE OF THE HISTORICAL BACKGROUND OF THE PERIOD IN QUESTION

“Following the Austro-Hungarian Compromise of 1867, the law enforcement entities of the Kingdom of Hungary were the following: police force units, the Royal Hungarian Gendarmerie, the Royal Hungarian Finance Guards, customs officers, home guards, the Royal Hungarian Crown Guards, and the Guards of the House of Representatives. Hungarian police force units could be divided into two categories: state and council police units, since the laws of Hungary guaranteed law enforcement rights only to the state and to local councils. Hence, police units were established by municipalities and townships with a settled council. Villages could hardly ever afford a police unit, but even if they did, their headcount did not exceed ten officers and practically functioned as a

small police department. Municipal police units were under the control of the local council. The Minister of Domestic Affairs could exercise no direct control over them, except as the supervisor of legality, via the local councils.

Although the idea of nationalisation of council police units came into focus during the period of the dual monarchy, it was not turned into action. The main advocates of nationalisation were the officers of the council police units, who considered state police to enjoy a higher prestige while they also wanted to mitigate the extent of direct provincial interests in law enforcement.”<sup>1</sup>

“Besides council police units, state police units constituted the other half of the law enforcement system of Hungary. The state police, in turn, consisted of three groups: the metropolitan police, the Royal Hungarian Border Guards and the State Police of Rijeka (Fiume in Hungarian). State police were

established in localities where direct state control or a higher degree of law enforcement was deemed important. The governments of the period regarded the public safety of Budapest and of Rijeka, as well as guarding the borders of the Kingdom of Hungary, to be of special significance. The state police were the elite force among the Hungarian law enforcement units: the qualifications, gear, supplies and criminal detection record made them a role model for the police officers in the council units.”<sup>2</sup>

“The main areas of law enforcement activities were regulated centrally by laws and decrees that applied to the entire country. These were also integrated in regulation of the duties of council police units. By the turn of the century, the scope of the authority of law enforcement forces had also been established based on a territorial principle, while the boundaries were not rigid. A member of one unit could also work on the territories of another unit, having obtained the approval of the officer in charge.

As far as the separation of the gendarmerie and the police force was concerned, it was quite an interesting issue. In villages, it was clearly the gendarmerie that looked after public safety, while in municipalities it was the police force that performed this job. Some of the towns with settled councils, however, commissioned the gendarmerie to work for them against remuneration; they particularly drew in the help of the gendarmerie in the maintenance of order in the suburbs, while in the centre of town, they tended to employ the local police force. Should the police of a town with a settled council not have coped with a crime, they had the opportunity to ask the nearby municipality for assistance. In this case, it was absolutely necessary to centrally regulate the activities related to the main procedures of law enforcement, especially

those connected to the infringement of civil rights and fundamental freedoms.”<sup>3</sup>

“Besides investigation work, the protection of public order affecting the fundamental freedoms, such as short-term arrest, escorting, perp walk, body search, home search and the use of firearms, was regulated.”<sup>4</sup>

“The duties of the municipal police would be determined by the rules of their Regulation of Duties. Every municipality would have their own set of regulations. Although these law enforcement units regarded state police as their role model in the realms of regulations and duties, the individual perspectives on crime and law enforcement of the local chief constables were also strongly represented.

The set of regulations of municipal police forces normally contained the organisational structure of the local unit, their goals and duties, the rules of admission and dismissal, the issues of discipline, rules of conduct, ways to make complaints, the rules for fulfilling duties and the use of firearms, the responsibilities and obligations of the various positions, the compensation and benefits of the staff as well as the procedures of individual assignments (e.g. perp walk, arrest, etc.). Even though there are common features, each and every set of regulations is a unique piece of work.”<sup>5</sup>

“In the period following the Second World War, the main trait of law enforcement in Hungary between 1945 and 1950 was the elimination of the national nature of our police force, as the law enforcement model of the oppressive Soviet Union was imposed, just like in other sections of public administration.”<sup>6</sup>

“During Stalin’s dictatorship, law enforcement activities were distorted, as police organisations became more or less the in-

strument of the law-breaking and inhumane works of the dictatorship, thanks to which almost the entire population, practically all families were subject to some atrocity of varying severity.”<sup>7</sup>

In my opinion, Act XXI of 1881, as well as some further provisions from the period of the dual monarchy, is comparable to the provisions of the police act in effect regarding the methods of regulation and the provisions’ structures.

## II. CHANGES IN THE REGULATIONS CONCERNING THE USE OF FIREARMS

The use of firearms – due to its forceful nature and possible consequences – has always been regulated with severity and in great detail. The use of guns by the police is based on the principle that firearms can be used by law enforcement in legally defined situations outside self-defence and last resort cases. Hence, the application of firearms must be regulated in a way that the police officer could respond to the given situation adequately instead of having to interpret the law. I will therefore explore how the legislators of the various periods have tried to meet this requirement.

Section 30 of Act XXI of 1881 – which also includes the general authorisation – states: “The police may apply forceful measures against assaults, as protection and to overcome forceful opposition; as a last resort, they may also use firearms.”

This general provision is clearly unsuited to regulate the activities of a police officer in action, so let us have a look at the detailed rules belonging to the cited provision:

“Using firearms is an excellent right but also involves great responsibility requiring more detailed instructions, which I will sum

up as the following: Apart from the case of justified defence and self-defence<sup>8</sup> – which is everyone’s lawful right – the police officer on duty can only use his gun in the following events:

- a) if he is under attack or is threatened by the realistic possibility of an assault. It can be considered a threat if the person in question does not put down or hand over his gun or other dangerous weapon upon the officer’s request or if the armed person in question refuses to leave his shelter,
- b) if – while on duty – he encounters forceful opposition, which could thwart his action and the police officer has no other means to achieve his goal,
- c) if the firearm is used to defend or protect a third party.”<sup>9</sup>

The above options – though they must have corresponded to the requirements of the period – allowed the use of firearms in a rather restricted manner: they basically re-formulate the idea of lawful protection of persons from a law enforcement perspective. For the prevention of certain severe crimes or for the arrest of the perpetrator – in other words, for handling special situations related to law enforcement – no use of firearms was allowed, unlike in later years.

The above-mentioned three possibilities are listed in the regulation, linked to the name of Imre Laky, as well as in the law enforcement encyclopaedia that was completed later, as no other legal provisions were present at the time.<sup>10</sup>

In 1921, the legal statutes changed but their content was still similar regarding the application of firearms “[...] as a last resort, the use of firearms is possible, as a way of defence against direct assault or the threat of such, or as a means to overcome forceful opposition.”<sup>11</sup>

“The use of firearms by individual members of the police force by their own decision complies with the general principles of Section 50 in the following cases:

- a) He is assaulted, or
- b) his life, physical integrity or personal freedom are directly jeopardised by a possible assault in circumstances that prompt him to consider the assault to be realistic, or
- c) while on duty, he encounters acts or threats (in the above sense) that could thwart the lawful performance of his duty, and the police officer cannot handle the situation with any other, milder means, or
- d) only by using a gun can he protect a third party whose life or physical integrity is directly attacked or jeopardised with such.”<sup>12</sup>

In other words, this regulation also restricts the use of firearms to attacks against the life or physical integrity of the police officer himself or that of a third party. It is clear, however, that in order to maintain public order, the use of guns can also be legitimate in other cases.

The scope of statutory possibilities was extended in June 1932 by the adoption of a provision which defined the use of firearms of police officers until 1963.

The bill was tabled by the Minister of Domestic Affairs, Vitez Ferences Keresztes-Fischer, who gave the following reasoning for the change: “[...] the regulations of the use of firearms by the Royal Hungarian Police are determined by Sections 50–62 of the Ministerial Decree 39, 820/1921. This regulation is not adequate, as all rules are governed by the principle of Section 21 of Order 5047/1919 of the Prime Minister, namely the principle of ‘last resort’. The scope of ‘last resort’, however, is rather extensive, thus the concept can be inter-

preted in various ways. As a result, the Royal Hungarian Police interpreted it as narrowly as possible at all times. This treatment, though, often jeopardised not only the undisturbed service of public safety but – as demonstrated by a recent tragic event – the threat against the lives of Royal Hungarian police officers could not be combated sufficiently and adequately. It is therefore necessary to provide the Royal Hungarian Police with an adequate set of regulations regarding the use of firearms that serves the interests of public safety as efficiently as possible.

The novelty of the suggested new regulation lies in the fact that cases when guns may be used are defined by law, while it also extends the scope of use of firearms to some extent by allowing the use of guns – similarly to that of the gendarmerie – to carry out the warrants of arrests in some cases, in addition to events of assault and forceful opposition.”<sup>13</sup>

As I stated above, until 1932, the regulations regarding the use of firearms kept being reformulated as the rules of lawful defence. According to the Minister of Domestic Affairs, it was necessary to codify the change in the service-oriented cases of applicability of firearms. At the same time (1927), the Royal Hungarian Gendarmerie’s Organisations and Service Manual contained the following instructions:

“Sections 49. Use of firearms

330. The gendarme on duty is entitled to use his gun against anyone

1. who assaults him physically or threatens to assault him physically. The gendarme is obliged to use his gun,
2. if he can by no other means protect a third party’s life, physical integrity, personal freedom or property illegally and severely threatened,
3. if the gendarme is prevented from performing his duty despite his warning

- of his intent to use his firearm, and his opposition cannot be broken in any other way,
4. if the armed person who is to be arrested by the gendarme does not put down his weapon or refuses to leave his shelter despite the warning call of the officer, and there is no other way to disarm him,
  5. if a dangerous perpetrator already arrested or to be arrested flees and does not stop despite the clear warning by the officer of using his firearms, and there is no other way to halt him,
  6. if the crowd of people that is to be dispersed by the gendarme or, if it is necessary to maintain public safety, will not be dispersed despite the clear warning of the intent to use firearms, and the dispersal is not possible in any other way,
  7. if in war or among extraordinary conditions someone raises suspicion and upon being called to account, runs away without providing an adequate explanation.”

Based on the above, the statutory regulation of the use of firearms by police officers was modified in the following manner: “Members of the Royal Hungarian Police who are entitled to bear arms are entitled to use their guns while lawfully performing their duty:

1. When handling an assault or in the event of a conduct that jeopardises life, physical integrity or personal freedom.
2. When attempting to handle the forceful opposition manifested in the threat against life, physical integrity or personal freedom.
3. When disarming an armed person who is to be arrested and his disarmament does not seem possible without using guns.
4. When trying to lay hands on a suspect or sentenced criminal who is to be arrested and this act seems impossible without using guns.
5. When trying to prevent a severe offence, if it cannot be impeded in another way than by using guns.
6. When trying to disperse a crowd upon the official order of dispersal, which is necessary to maintain public safety.”<sup>14</sup>

The rules of this provision are listed in detail by Order 185.100 of 1932 of the Minister of Domestic Affairs.<sup>15</sup>

To my mind, this set of rules clarifies the possibilities for use of firearms by the police thoroughly, with sufficient complexity yet not in an overly complicated manner, which can also be applied in our era. Naturally, dispersal of a crowd had to be removed from the law in effect, a logical and appropriate consequence of conformity to European jurisprudence.

The “Textbook of Regulation of Duties” from 1939 includes the same rules.

Order 9.000-4/1952 of the Minister of Domestic Affairs – the Regulation of Duties – in effect from 1952, points to Act XIII of 1932 as the legal source for using firearms by police officers, still, it defined the application of guns based on Order 06/1954 of the Minister of Domestic Affairs:

“Members of the Police Force may use firearms:

- a) If there is no other way to handle assaults jeopardising life, physical integrity or personal freedom.
- b) Against anyone who prevents the police officer from performing his duties in any way or threatens to assault them, and there is no other way to break his opposition.
- c) Against anyone who has committed a severe crime or can be reasonably suspected of such, and there is no other way to arrest the above-mentioned suspect or perpetrator.

- d) To prevent severe crime, if there is no other way to prevent it.
- e) To arrest already sentenced perpetrators or persons having escaped from custody, if there is no other way to lay hands on them.”<sup>16</sup>

As pointed out above, the part defining the possibility to use firearms to disperse crowds is omitted from the above regulation. However, the clarifications of this reference work do suggest a way to do so, formulated in the manner characteristic of the era:

“Thanks to the social structure of the socialist state, as opposed to capitalist states, there is no need to take measures against the crowd, thus no specific regulation is necessary. The dictatorship of the proletariat means namely the oppression of the majority against the disempowered, formerly exploitative minority. After the overthrow of the exploitative system, it would be pointless and unreasonable for the proprietor of the power to have their rights observed by getting crowds of labourers to march in the streets. Nevertheless, the fact of the dictatorship of the proletariat does not exclude, on the contrary, it prompts the representatives of the overthrown social regime to attack the labourers’ state, some of its institutions or some its democratically inclined members even by arranging a larger group of people in a domestic or foreign political atmosphere for them. In this event, it is natural that a crowd gathered against the people’s democracy involves the threat of severe crimes. The prevention of such severe crimes or fighting its actual realisation – against such a hostile crowd – lie in the interest of our society, more precisely, the state, even at the cost of using firearms.”<sup>17</sup>

I believe that the above-cited text does not require further comment.

The legal source determining the subsequent period and its Regulations of Duties is Decree 22 of 1963, which was taken out of effect by Act XXXIV of 1994. Section 3 of the decree prescribed the following:

“The police officer [...] uses a firearm:

- a) to prevent severe crime,
- b) to arrest a person reasonably suspected of having committed a severe offence,
- c) to get hold of the person who escaped from custody during criminal proceedings or penal sentence,
- d) to disperse groups threatening public safety and order,
- e) to prevent and fight attacks severely threatening the life and the physical integrity of a third party or to prevent a conduct that directly threatens with such an assault,
- f) to prevent and fight attacks against his own life, physical integrity or personal freedom, or to prevent conduct that directly threatens with such an assault,
- g) to combat forceful opposition to his own actions.”<sup>18</sup>

These rules include the possibilities already adopted in 1932. It is remarkable, however, that even though there was no change regarding the social order, now the formulation was straightforward: the possibility to use firearms to disperse a crowd was not covertly implied anymore.

The Regulation of Duties from 1952 did not yet contain exceptions from the use of guns, but Section 4 of the cited act decrees the following:

“Firearms may not be used in the cases listed in Section 3:

- a) if they jeopardise the life or physical integrity of a person who does not fulfil the requirements of firearm use,
- b) against children and pregnant women.”

Naturally, with the exemption of self-defence.

Regulations of Duties in effect from 1977, 1985 and 1990 contained the above rules alongside the exceptions,<sup>19</sup> the only difference being that the regulations of 1977 and 1985 used the term “criminal act” instead of “criminal offence” in Parts a) and b) as the pre-requisite of using firearms.

It makes us wonder, however, why in the period of political change, in 1990, just some months before the first free elections, it was necessary that a Regulation of Duties (Order 1/1990 of the Minister of Domestic Affairs) came into effect that facilitated the rules of the most nefarious periods of the Kádár-era, including the use of firearms to disperse a crowd, which remained in force until October 1994, until Act XXXIV of 1994 came into effect.

On 20 April, 1994, Act XXXIV of 1994, published in the official gazette, prescribed the following:

Section 54. Police officers can use firearms

- a) to prevent direct threat or assault that jeopardise human life,
- b) to prevent direct assault threatening the physical integrity of a person,
- c) to prevent and disrupt the crimes of public hazard, terror attacks, aircraft hijackings,
- d) to prevent crime with firearms, explosives or any other weapons fit to extinguish life,
- e) to prevent acts of illegally and forcefully acquiring firearms or explosives,
- f) to prevent armed attacks against the operation of the state or any facility that is crucial for the supply of the population,
- g) to arrest perpetrators who deliberately have extinguished someone’s life and to prevent their escape,
- h) to arrest and prevent the escape of criminals having committed crimes against

the state (Article X of the Penal Code) and crimes against humanity (Article XI of the Penal Code),

- i) against those who will not concede to the request of the police officer by refusing to put down his gun or other weapon, and whose conduct implies an imminent direct use of his arms or other dangerous weapons against another person,
- j) to prevent the escape or forceful extrication of a person in custody or under arrest in accordance with a court decision or to arrest this perpetrator unless they are under age,
- k) to prevent assault against his life, physical integrity or personal freedom.

Section 55. No firearms may be used – with the exception of the prevention of armed attack, the combat against armed resistance or of use against a single individual in a crowd of people (Section 57)

- a) if they jeopardise the life or physical integrity of a person who does not fulfil the requirements of firearm use,
- b) the purpose of the law enforcement measure can also be achieved by shooting at an object or an animal.

### III. REGULATIONS IN FORCE

The provisions affecting police use of firearms have been amended once since the law entered into force: based on several requests, in 2004, the Constitutional Court declared some of the provisions of the regulation totally or partially anti-constitutional and repealed these within the framework of Decision 9/2004. For instance, provision h) is anti-constitutional as not all crimes implied in it involve the extinguishment of life, thus the use of firearms is not justifiable in these cases.

Formerly, provision i) contained the term „other dangerous weapons”, which – according to the Constitutional Court – is a

term difficult to define and its implications are too broad, which may result in legal uncertainty, thus it was replaced by the term „weapons fit to extinguish life”. No other significant change has been implemented in the police use of firearms since the relevant act was adopted.

Accordingly, the regulations in effect are the following:

Section 52. (1) Police officers are entitled to use their firearms – apart from the cases of self-defence and as a last resort – in accordance with the provisions of this act.

(2) The police officers may use their firearms of their own accord and under direct command. If in close order formation, members of law enforcement units may exclusively use their weapons upon direct command.

Section 53. (1) Only intentional shots aimed at persons qualify as use of firearms.

(2) Should the legal prerequisites of firearm use be met, the member of the police force may use anything as a weapon. Also in this case, the rules for applying the police use of firearms must be adhered to *mutatis mutandis*.

(3) From the perspective of the application of this act, the following instances do not qualify as the police use of firearms: rubber bullets, pyrotechnic or tear gas grenades used to maintain public order, firearms or netguns that are fired to release a net in order to entangle the target.

(4) Plastic bullets produced originally with other purposes not listed in (3) if – with consideration to the circumstances – may only then be applied, if no less forceful weapon proves to be fit or effective to accomplish the goal of the action. In the case of plastic bullets, the rules of the police use of firearms apply *mutatis mutandis*.

Section 54. Police officers can use firearms

a) to prevent direct threat or assault that jeopardises human life,

b) to prevent direct assault threatening the physical integrity of a person,

c) to prevent and disrupt the crimes of public hazard (Criminal Code Section 322) terror attacks (Criminal Code Sections 314–316.), vehicle hijackings (Criminal Code Section 320),

d) to prevent crime with firearms, explosives or any other weapons fit to extinguish life,

e) to prevent acts of illegally and forcefully acquiring firearms or explosives,

f) to prevent armed attacks against the operation of the state or any facility that is crucial for the supply of the population,

g) to arrest perpetrators who deliberately have extinguished someone’s life and to prevent their escape,

h) [...]

i) against those who will not concede to the request of the police officer by refusing to put down their gun or weapon fit to extinguish life, and whose conduct implies an imminent direct use of their arms or other weapons fit to extinguish life against another person,

j) to prevent the escape or forceful extrication of a person in custody or under arrest in accordance with a court decision or to arrest this perpetrator unless he/she is under age,

k) to prevent assault against his life, physical integrity or personal freedom.

(2) Hungarian police officers serving in any other state due to any international agreement or obligatory legal act of the European Union may use firearms in the events and manner specified in the applicable international agreement or the obligatory legal act of the EU.

(3) Police officers belonging to foreign law enforcement or border control organizations may use their firearms in

Hungary in accordance with this act, the Act on International Cooperation in Criminal Matters, the applicable international agreement or the obligatory legal act of the European Union.

#### IV. SUMMARY

The history of police measures in the past 125 years demonstrates both stability and significant change. It turned out that a new law does not always mean improvement or development, as it becomes particularly obvious in the regulations in the period between 1945 and 1989. Nevertheless, law enforcement measures have served the maintenance of public order or the restoration of disrupted order in every period. Unfortunately, it is true, however, that the concept of public order often became distorted, and the police was forced to take on the role of the tool of the oppressing regime.

Perhaps the most significant phenomenon of our times is mass migration, which makes law enforcement organs as well as the army face new challenges. It must therefore also be clarified in what event soldiers assisting the police in their law enforcement activities may use their firearms.<sup>20</sup>

In Hungary during the period of the Austro-Hungarian Empire, the first legal act regulating the police use of firearms was passed in 1881. Besides the police, also the Royal Hungarian Gendarmerie was to fulfil law enforcement objectives at the time. I hope to have successfully presented the changes in the regulation of police use of firearms from 1881 until the adoption of Act XXXIV of 1994, which is in effect to this day. Furthermore, I trust that I could convey to the reader that in addition to a number of practical professional criteria – unfortunately, also politics was to determine the regulation of the police use of firearms in any given era. It

can be established that change – the adoption of a later rule – does not necessarily imply improvement. Legislation during the communist era would often regulate the police's right to use their firearms in the form of simple commands or decrees instead of legal acts. It is clear that in this period the actual objective was to maintain the ethos of the rule of law. The rules of firearms use has gone through a development process: from the simple transcription of the criminal legal regulation of self-defence to – by integrating practical professional law enforcement rules – to the current law. It was in 1930 for the first time that the regulation changed for the more practical by evoking the Royal Hungarian Gendarmerie's Organisations and Service Manual.

In communist times, corresponding to the political requirements of the regime, the legislative power practically ignored fundamental human rights. To my mind, the regulation in force today – which has also been subjected to the examination of the Constitutional Court – is far too complicated to be applied effectively by any police officer in the event of an attack or any emergency. Rarely does the legislation consider practical law enforcement perspectives. The simplicity of the regulation of the Austro-Hungarian Empire, however, greatly enhanced the police use of firearms in specific operations. The currently effective regulation tries to consider all criteria of the rule of law and the constitutional system. Strictly from a practical professional point-of-view, I regard these considerations as exaggerated. It is quite awkward, if a police officer has to interpret legal acts before firing a shot.

Having compared the rules of the various regimes and eras, we can state that use of firearms was always taken as the last resort. The police was always required to avoid firing a shot as long as they could. Con-

sidering this aspect – as well as the fact that according to the statistics, the police use of guns is exceedingly rare in Hungary –

it is quite understandable why the legislation tends to take into account legal rather than practical law enforcement criteria.

<sup>1</sup> Parádi 1996, 68.

<sup>2</sup> I. m., 69.

<sup>3</sup> I. m., 74.

<sup>4</sup> I. m., 75.

<sup>5</sup> I. m., 76.

<sup>6</sup> Parádi 1996, 125.

<sup>7</sup> Parádi 1996, 138.

<sup>8</sup> Section 79 of Act V of 1878.

<sup>9</sup> Section X of the Decree 43, 972 of the Minister of Domestic Affairs of 1884.

<sup>10</sup> Laky 1901, 69; Rendőri Lexikon (Közrendészeti és büntetőjogi tudnivalók betűrendes kézikönyve, Pátria Irodalmi Vállalat és Nyomdai Részvénytársaság nyomása 1909, 301. o.).

<sup>11</sup> Section 50 of the Decree 39, 820 of the Minister of Domestic Affairs of 1921.

<sup>12</sup> Section 54 of the Decree 39, 820 of the Minister of Domestic Affairs of 1921.

<sup>13</sup> Ministerial Reasoning for Act XIII of 1932 (Országos Törvénytár (National Legal Inventory Issue 5), p.105.

<sup>14</sup> Section 1 of Act XIII of 1932.

<sup>15</sup> Magyarországi Rendeletek Tára (Inventory of Orders in Hungary) 1932, VII–IX, 810.

<sup>16</sup> Ministry of Interior 1957, 56–62.

<sup>17</sup> Ministry of Interior 1957, 61.

<sup>18</sup> Bodrogi 1964, 48.

<sup>19</sup> Section 461 of Command 7/1977 of the Minister of Domestic Affairs; Section 493 of Command 24/1985 of the Minister of Domestic Affairs; Section 222 of Order 1/1990 (I. 10.) of the Minister of Domestic Affairs.

<sup>20</sup> For further information, see Merkl 2016.

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