

Voluntary formation of a territorial community: mechanisms of state administration and financing

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■ **Abstract.** With the intensification of global security challenges, nation-states are increasingly confronted with the active emergence and development of paramilitary formations. For Ukraine, in the context of the Russo-Ukrainian war, this issue has acquired particular significance. The study aimed to analyse the organisation, functions, governance, financing of voluntary territorial community formations as paramilitary groups and determine the specific features of their operation and the consequences of their activities for society, including latent and non-evident effects. The study was based on an integrative review methodology combined with elements of the case study approach. The analysis highlighted globally relevant yet nationally specific forms of territorial paramilitary groups within modern nation-states. Based on theoretical frameworks and empirical data, including an examination of the activities of such groups in the United States, Ukraine, and Iraq, the study explored the benefits and challenges those voluntary paramilitary formations pose for national security. The findings demonstrated that strategies for addressing paramilitarism must cover both the positive and negative dimensions of this phenomenon, avoiding universal solutions. To determine the nature of any paramilitary group, it is necessary to develop clear criteria, threshold indicators, and assessment methodologies. While the state may derive potential benefits from self-organised citizen volunteers engaged in defence and security matters, the effective utilisation of this resource requires a clear legislative framework, transparent financing mechanisms for

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paramilitary formations, and a well-defined role for such groups within the national security system, including from a long-term perspective. The practical value of the study is determined by the development of an analytical foundation for assessing the overall role of voluntary territorial paramilitary formations within the security landscape of states operating under the dynamic conditions of hybrid war and hybrid peace

■ **Keywords:** paramilitary formations; hybrid war; national security; local budgets; local communities

■ Introduction

Since the beginning of the 21st century, policymakers and the media have become more concerned regarding paramilitary groups, partially due to perception as a possible threat to the peace (or at least the status quo of the existing political systems) in the nations. The establishment of organised, armed groups, frequently supported by the state or non-state, to protect and govern a particular geographic area is known as paramilitary territorial formations. The necessity for local security in the absence of an efficient state response to conflict or social crises, the lack of official military force, or the implementation of political goals such as thwarting aggression or reaffirming national identity are some of the circumstances that cause the creation of such forces. Official territorial defence forces (TDFs), such as those in Ukraine, or unofficial organisations with radical ideologies and differing degrees of state incorporation are covered by the definition. The emergence and further development of such organisations is related to particular historical and political contexts (Hristov *et al.*, 2022).

T. Böhmelt & G. Clayton (2018) argued that governments frequently complement their conventional military forces with paramilitaries and pro-government militias (PGMs). At the same time, the factors that determine a state's choice of one type of auxiliary force over another remain insufficiently explored, as do the mechanisms underpinning the evolution of these formations. The study highlighted the substantial differences between the two categories: paramilitary forces are integrated into the state apparatus and operate as an extension of it, whereas PGMs function outside official institutions. Within a principal-agent framework, the researchers demonstrated that a state's investment in a particular auxiliary force structure is shaped by available resources, the need for control or deniability, and the nature of domestic threats.

Extending this analytical perspective, U. Üngör (2020) further explored a comprehensive conceptualisation of paramilitarism as a modality of organised violence that operates in close proximity to, yet formally outside, the institutional architecture of the state. The comparative investigation demonstrated that paramilitary actors are not contingent or marginal phenomena, but constitute purposeful instruments through which state authorities or dominant political elites delegate coercive functions, expand territorial reach, and externalise the repression while preserving strategic deniability. Author's framework underscored the centrality of historical trajectories in shaping the emergence, consolidation, and transformation of paramilitary formations across diverse geopolitical settings. In this context, paramilitarism should be regarded not solely as a

security-related occurrence, but as an integral component of broader state-society relations, wherein informal armed groups assume roles in governance, social regulation, and conflict management in accordance with prevailing political opportunities and constraints.

The phenomenon of territorial defence involves mobilisation of local residents to defend the homeland, ensuring rapid deployment of forces, leveraging local knowledge, and high motivation as people protect homes and families. Territorial defence combines military and civilian components, not only performing combat missions but also maintaining law and order, protecting critical infrastructure, and assisting the population in emergency situations. As noted by H. Karolyi *et al.* (2025), in Ukraine, the voluntary formations of the territorial community (VFTC) was central in the liberation of many settlements from occupation during Russo-Ukrainian war and continue to perform combat missions in many. However, the concepts of "territorial defence forces" and "volunteer formations of the territorial community" are still often interpreted as similar. Notably, the concepts of "territorial defence forces" and "volunteer formations of the territorial community" were introduced after the Law of Ukraine No. 1702-IX (2021) was introduced. According to this Law, a voluntary formation of a territorial community is a paramilitary unit formed on a voluntary basis from citizens of Ukraine living within the territory of the relevant territorial community, which is intended to participate in the preparation and implementation of territorial defence tasks.

The political role of voluntary formations of territorial communities, in the official definition, is to ensure security and defence capability, as well as to contribute to trust and unity of citizens, forming patriotism and responsibility for the security of the community. S.V. Petrukha *et al.* (2024) and N. Petrukha *et al.* (2025) noted that voluntary formations of territorial communities are an instrument for implementing state policy in the field of defence and at the same time an expression of an active civic position that influences decision-making at the local level, although they have limited political functions. Although VFTCs do not have political influence in the traditional sense, their activities are part of a complex process of forming and implementing territorial defence programs that affects the security policy of the community. However, as the history of the creation and functioning of such formations and modern cases of their activity shows, the political component is an integral element of their landscape, which is largely determined by the mechanisms of state governance and financing of these formations. Meanwhile, the unified framework for

assessment of the essence and security (including long-term ones) implications of paramilitary formations was not yet developed. In this context, the study aimed to analyse the patterns and concerns of the organisation, purpose, management, and financing of voluntary formations of territorial communities as paramilitary groups phenomenon, to outline the features of their roles and implications for public administration and society, including the latent ones.

■ Materials and Methods

The study was of qualitative nature and was based on integrative review methodology toolkit, according to six stages suggested by M. de Souza *et al.* (2010): formulating the leading question, conducting a literature search or sample, gathering data, critically analysing the included studies, discussing the findings, and presenting the overall findings. The integrative review approach was selected due to suitability to the study of complex and multidimensional phenomena such as paramilitary formations, incorporating empirical studies, theoretical analyses, policy reports, and case-based research into a single analytical framework. The guiding question was formulated as follows: what are the origins, role, functions, actual activities, and security implications of paramilitary voluntary territorial formations within contemporary nation-states?

The process of search and screening was conducted within the following scientometric databases (libraries): ScienceDirect, Wiley, MDPI, JSTOR, ResearchGate, Emerald Insight. To locate expert reports and monographic works, supplementary searches were performed via Google Scholar, Google, and Amazon Books. The array of inquiries included: “paramilitary formations in contemporary world”; “theories of paramilitary”; “territorial defence”; “paramilitary formation interaction with government”; “public administration concern of paramilitary formations”; “paramilitary governance and financing”. Only publications in English and Ukrainian (specifically for obtaining data on Ukrainian case) were considered. Criteria of inclusion the entry into final sample implied the presence of empirical research/thorough theoretical study/systematic review/report/case study.

To obtain a multidimensional concept of paramilitary formations, the analysis was conducted across two complementary layers, each serving a distinct analytic purpose and contributing critical insights to the overall synthesis. Vertical (within-case) analysis examined each national context – United States, Ukraine, Iraq – independently, prioritising internal structures, historical trajectories, and national security environments. This identified specific drivers of emergence and transformation paramilitary formations in each country; reconstructed the interaction of paramilitary units with state institutions; highlighted case-specific governance, operational, and financing arrangements. The second horizontal (analytic) layer arranged the findings from each national case into comparative perspective, identifying structural commonalities and divergences across contexts with very different political

orders and conflict conditions. This underscored broader patterns that transcend individual cases; highlighted paramilitarism as a global phenomenon rather than isolated national anomalies; created conceptual generalisations regarding hybrid security governance, militia institutionalisation, and the political economy of paramilitary formations. Together, the two-layer analytical design provided both depth (via country-specific investigation) and breadth (via cross-case conceptualisation), ensuring that the phenomenon of paramilitarism was covered not only in its local manifestations but also in its broader structural and theoretical significance.

■ Results

Paramilitary forces, particularly those that emerge within territorial communities, were created in different forms over the world (Vukušić, 2022; Mireanu, 2023). A paramilitary organisation, also referred to as a quasi-militarised force, is an unofficial group that operates outside of a jurisdiction of national armed forces. It is a semi-militarised group that functions similarly to a professional military in terms of training, tactics, organisational structure, and subculture (Powell, 2019). Furthermore, while state-affiliated paramilitary groups typically act as non-state actors, they can sometimes function autonomously or in support of state objectives, with some striving for complete executive control. Their function as adjuncts to conventional armed units or during times of conflict, civil conflicts, and instability caused by various types of irregular warfare is a crucial component of their creation. A general outline of the nature and functions of paramilitary formations makes it possible to turn to an analysis of their manifestations in the United States, Ukraine, and Iraq, where they assume different forms based on the prevailing political, security, and social conditions.

Paramilitary structures and territorial formations in the United States

In the United States, paramilitary territorial formations encompass a broad spectrum of actors, including militarised police units and specialised federal agencies. Their development spans from historically sanctioned militias and vigilante groups to contemporary private organisations (Table 1). The late 20th witnessed a renewed proliferation of private militias, often motivated by anti-government sentiment and the defence of property, while earlier entities such as the Pinkerton Agency can be regarded as organisational predecessors. In parallel, the 21st has been marked by an intensified militarisation of policing, driven in part by overseas operational experience and the transfer of surplus military equipment to law-enforcement agencies. Thus, as evident from the table above, the essence and conceptual foundations of paramilitarism in the USA did not manifest paradigmatic evolutionism up to 21st century, except larger emphasis on border security, which related to illegal migration from Mexico and corresponding increasing crime (particularly drug crime) rates. P. Kraska

& V. Keppeler (1997) analysed the rise in the number of police paramilitary units (PPUs) in the US, their distinctive features, and a notable change in their composition. The results showed a direct connection between PPUs and the armed forces, an increase in PPU activity, and the normalisation of PPUs into mainstream policing. The results also showed that despite rhetoric regarding community and problem-oriented policing reform, many police

departments had taken an aggressive stance. Critics (Maser, 2021) contend that this strategy, which is demonstrated by police using armoured trucks and riot gear during rallies, fosters a “militarised” atmosphere that views people as enemies, increasing the risk of violence and disproportionately hurting minority groups. Police use of military methods has the potential to erode community trust and increase the volatility of nonviolent protests.

Table 1. Paramilitarism in the USA: History and modernity

Historical roots	The modern era
Colonial militias: in the past, every physically fit man served in a colony's militia, which acted as a local defence force for towns and villages	Private militias: groups proclaiming to be militias, or the “unorganised militia”, began to appear in all 50 states after the early 1990s
Vigilante movements: in the 18 th and 19 th centuries, these organisations were formed as coordinated, but frequently transient, attempts to uphold moral and social principles by local residents, occasionally without the assistance of official law enforcement	Based on the reactions to racial justice and climate change movements, right-wing extremist groups – including white power organisations – often present their activities as the justifiable protection of property rights and American values
Private security: for instance, in the 19 th century, the Pinkerton National Detective Agency operated as a sizable, privately hired police force that pursued criminals and suppress strikes by big companies	Border patrol: following 9/11, there was a greater emphasis on border security, which resulted in border patrol training and activities abroad

Source: compiled by the authors based on A. Cooter (2024)

The United States National Guard, founded as a citizen force in 1636, is a “ready” reserve corps of over 400,000 men and women who serve voluntarily in all 50 states and four US territories. Guard members work civilian jobs while pursuing part-time military training. They are summoned to serve during civic disturbance, natural catastrophes, labour strikes, conflicts, health emergencies, and riots (Üngör, 2020). Guard troops, which exist as both a state and federal force under the United States Constitution, may be ordered to maintain public safety, order, and peace at homeland in times of disaster, as well as to serve as key components of America's military abroad.

The great majority of the United States National Guard's financing comes from the federal government through the Department of Defence budget, which Congress has approved. This federal financing includes staff, equipment, operations, and training. While states provide some financing, often around 10%, for state-specific tasks such as disaster relief, the federal government is the primary source, paying for approximately 90% of a state's National Guard budget. The National Guard is unique from the other federal reserve forces: the Army, Navy, Air Force, and Marines. National Guard troops are directed by state governors until the president of the United States orders them into active federal duty for home or abroad emergencies. Guard troops normally serve in home states, in place of employment and residence, with drills planned one weekend per month and an annual two-week training program. The National Guard serves at the community and national levels, responding to combat and reconstruction missions, domestic emergencies, etc. It has been involved in every major U.S. conflict, having evolved over nearly 400 years from local Colonial militias to fighting in the first American Revolution battles, serving in two world wars, and defending the U.S. capitol from the riots in 2021 (Jefferson, 2023).

The National Guard claims that since the terrorist attacks of September 11, 2001, it has deployed over 500,000 soldiers for federal tasks and has been instrumental in homeland protection and disaster assistance as part of its state duty. Approximately 50,000 National Guard members were sent to the Gulf Coast in 2005 for rescue, evacuation, and humanitarian efforts during Hurricane Katrina (Üngör, 2020). In 2020, the Guard deployed approximately 100,000 troops to support anti-racism demonstrations, California wildfires, and the coronavirus epidemic. National Guard assistance was requested during the unrest in U.S. Capitol on January 6, 2021, the day Congress convened to formally count the Electoral College vote. Despite California Governor Gavin Newsom's complaints, President Donald Trump ordered the deployment of 2,000 National Guard troops in Los Angeles in June 2025 to put an end to demonstrations against the administration's immigration crackdown (Kennedy, 2025).

State Defence Forces (SDFs) are state-authorised, volunteer military groups in the United States that, in contrast to the National Guard, are not federalised and remain under governor command. They assist the home state National Guard and civilian organisations, primarily with disaster response, homeland security, and public safety duties. SDFs, authorised by § 109 of the United States Code No. 32 (1956), are a valuable and low-cost force multiplier for states. However, funding, training, and structure differ by state.

In the United States, state general money, special appropriations, or grants are the main sources of funding for SDFs; federal funding is either non-existent or significantly limited. Compared to the National Guard, which receives substantial state assistance for people, equipment, and maintenance, these state-funded forces frequently function at a fraction of the cost. SDFs can provide homeland security and disaster response capabilities due to funding that assists with operational expenses, equipment, and training.

Core characteristics of these formations are as follows:

1. State jurisdiction: SDFs are commanded by the governor of their respective states and function exclusively under the jurisdiction of their state governments.
2. Volunteer-based: the majority of SDFs consists of volunteers participating in regular training sessions and drills, usually once a month and during yearly training sessions.
3. Not federalised: SDFs are a state asset in times of crisis since, in contrast to the National Guard, they cannot be federalised.
4. Force multiplier: they support civilian authorities and the National Guard in a variety of domestic operations, acting as an invaluable force multiplier.
5. Cost-effective: SDFs operate at a substantially lesser cost than federal troops because they are frequently unpaid volunteers and depend on state resources.

This is not a complete list of voluntary territorial paramilitary organisations in the United States. Although there is no widely accepted criterion that a group must meet to be classified as a “militia”, numerous organisations within the larger anti-government extremist movement in the

United States exhibit comparable ideologies and methods. These common characteristics reflect the movement’s public image and serve as signals among supporters. A militia is a group of physically fit individuals between specific ages (e.g., 17 to 45; §246 “Militia: composition and classes” of the United States Code No. 10 (1956)) who may be called into action by the federal government or a state government during emergencies, as per federal and state legislation. Members of the U.S. National Guard, state national guards, and other state-established military units are considered “organised” militias. All other members of the federal militia or a state militia, as well as the relevant population of physically fit citizens, are considered “unorganised” militias. In the United States, paramilitary groups are commonly referred to as militias by law enforcement, journalists, and politicians, despite not being militias in the legal sense of the word (Crothers, 2019). The trend, depicted in the Figure 1, suggests that aggravation of social and political issues in the USA causes sharp rising of patriot and militia groups. After 2008 crisis and occurrence of new acute social disbalances, the militia movement enjoyed a major resurgence.

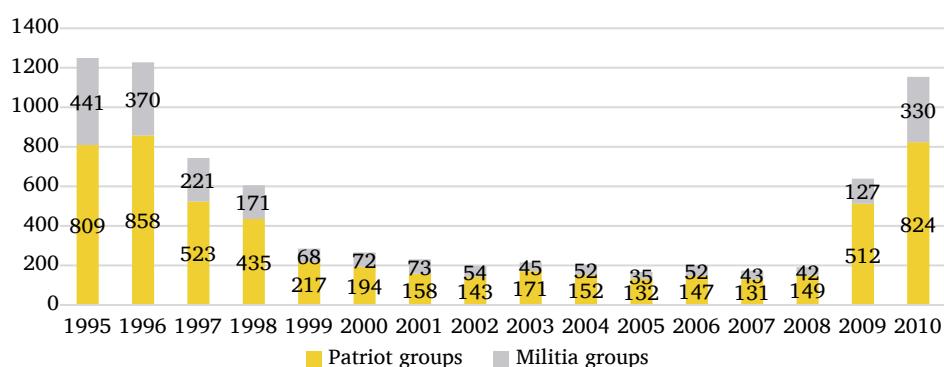


Figure 1. Militia groups rising in U.S., 1995-2010

Source: A. Cooter (2024)

The statistics showed that compared to the militia groups of the 1990s, militia groups founded after 2008 tended to have a notably younger membership (Doxsee, 2021). D. Pankhurst (2023) and A. Cooter (2024) argued that several factors contributed to this resurgence, with the expanding dominance of social media platforms being particularly influential in attracting younger individuals to the militia movement. Militia groups increasingly shifted their activity to social media platforms – initially MySpace, and later Facebook and YouTube – using these outlets to establish networks, disseminate ideological materials, and share training content. Such online presence facilitated first contact with the militia movement for many individuals, particularly younger adults, and contributed to the rapid and wide-scale expansion of reach of such groups. An illustrative example of these trends is present in a 2024 Facebook post disseminated by a U.S. paramilitary-style group. The post urged more than 650 members of the “Free American Army” community to “Join Your Local Militia or III% Patriot Group”, accompanied by the Three insignia of

Percenters and an image of a person holding a long rifle and wearing military gear. Such online mobilisation efforts reflect the broader patterns of recruitment, ideological signalling, and self-legitimation characteristic of contemporary American paramilitary movements (Owen, 2024).

As statistical data on the development of paramilitary groups in the United States after 2010 were unavailable at the time of the study, their dynamics can be assessed only based on news reports and open-source information covering their activities between 2010 and 2025. Although quantitative data are lacking, qualitative evidence indicates the continuation of an upward trend. In 2014, members of the militia and other anti-government movements moved to Bunkerville, Nevada, for internal armed standoff. Federal law enforcement authorities were present to pursue millions of dollars in unpaid federal land grazing fees owed by cattle rancher Cliven Bundy, who assembled anti-government activists for assistance (Sottile, 2024). As a result, state and federal authorities withdrew, giving the anti-government movement a unique triumph that influenced organisational

activities throughout the ensuing ten years. Since the Bunkerville standoff, the US militia movement has alternated between periods of increased and decreased public visibility, interspersed with sporadic violent occurrences. Its most recent climax was in 2020, when a range of militia movement organisations patrolled racial justice demonstrations as vigilante security forces defending private property and appeared at statehouse marches to protest COVID-19 lockdowns (Doxsee *et al.*, 2022). A few militias joined the “Stop the Steal” campaign following the 2020 election, and on January 6, 2021, they assisted in the storming of the US Capitol Building (Gartenstein-Ross *et al.*, 2022).

The main idea of militias is to prepare for an existential violent danger, and members frequently view themselves as heroes defending and upholding their communities and families. Though ideas and actions differ from group to group, the militia movement exhibits far greater ideological coherence between distinct groupings than the individual paramilitary groups that served as their inspiration. While most militia groups are generally against the government and law enforcement, others view themselves as possible partners for specific law enforcement organisations, including US Customs and Border Protection (CBP). In certain instances, such as their collaboration with CBP officers or their attendance at protests in the summer of 2020 to purportedly defend businesses, militia members once more positioned themselves as the last line of defence against alleged threats such as immigrants or left-wing protestors. Private, self-designated groups are financed through private donations, membership dues, or foreign backing, and they function without any legal governmental oversight, in contrast to the official National Guard receiving funds from both the federal and state governments.

Territorial defence and volunteer paramilitaries in Ukraine

Due to ongoing armed conflict, Ukrainian case differs significantly from that of other countries in Central and Eastern Europe. It demonstrates how paramilitarism can develop during a conflict. The Ukrainian volunteer paramilitary movement was substantial in the war with Russia. Although almost all volunteer battalions have been legalised within the security forces, the era of volunteerism remains relevant.

The flight of the Supreme Commander-in-Chief, Russia’s occupation of Crimea, and the outbreak of hostilities in Donbas demonstrated the inability of Ukraine’s state security forces in 2014 to effectively counter real threats. There were many reasons for the failure, including the overall low professional level, equipment, and quality of weapons, stemming from the marginal status of the Ukrainian Armed Forces and their residual funding, as well as the general demoralisation of the security forces following the change of power in Kyiv and the onset of the Russian intervention. The demoralisation of the security forces was dominant in the spring of 2014, when Russia attempted to conceal the involvement in the outbreak and escalation of the conflict in Donbas, operating behind the

Ukrainian pro-Russian radicals and Russian militants. In the context of localised hostilities and the overall small size of the opposing groups, relatively small but motivated formations could exert significant influence on the course of the fighting. Various volunteer paramilitary organisations became such groups (Seheda & Mashtalir, 2022). The Ukrainian volunteer paramilitary movement can be divided into several components. A. Martyniuk (2023) proposed the following division.

Firstly, these are volunteers and their groups who joined the existing units and subdivisions of the Ukrainian security forces at that time. This category of volunteers initially viewed themselves as part of the Armed Forces, the National Guard, etc. Therefore, their integration into the state security forces occurred automatically upon enlistment in active service.

Secondly, there were volunteers who joined the new battalions and companies of the Ministry of Internal Affairs of Ukraine. In 2014, these units effectively became the primary form of legalisation for volunteers within the Ukrainian security forces. These formations varied in size, structure, and weaponry, and most closely resembled irregular forces. Among the most well-known formations of this type, there were the “Dnipro-1” and “Azov” battalions, which were later reformed into regiments.

At the same time, the diverse social background of units in this category caused further integration into other security formations (such as the “Azov” battalion, which became part of the National Guard), merged, or even disbanded. In the latter case, disbandment could have been considered due to widespread crimes (Azov, n.d.). Moreover, some units managed to undergo the disbandment process twice. For example, after the decision to disband the “Shakhtarsk” battalion due numerous crimes committed by its members, the “Tornado” battalion was formed from the remaining battalion members (Militaryland, 2014). It also was later disbanded due to criminal activity.

A significant portion of the volunteer units of Ministry of Internal Affairs have undergone some form of reorganisation. This was also caused by the shift in the nature of the fighting in Donbas from a police operation against illegal armed groups to combined arms operations. These changes necessitated an increase in the firepower of volunteer units. This was difficult within the Ministry of Internal Affairs’ special battalions, so the “Azov” battalion, for example, transferred to the National Guard, where it was not only expanded to a regiment but also received a significant amount of heavy weapons, including tanks, howitzers, and heavy mortars.

The third category was the territorial defence volunteer battalions. These battalions were first formed in the spring of 2014, both on a voluntary basis and through the mobilisation of conscripts (Ukrainian military pages, 2022). Accordingly, the composition of the territorial defence battalions was heterogeneous. Notable volunteer units included the “Kyivska Rus” battalions (the 11th and 25th), the 34th “Batkivshchyna” battalion, and the 40th

“Kryvbas” battalion. After the territorial defence battalions were incorporated into the Ground Forces as motorised infantry battalions, this category of volunteers was fully integrated into the Armed Forces of Ukraine.

The fourth group includes volunteer formations that initially operated as non-state armed groups but were later integrated into various state security agencies. Among these formations, the “Donbas” and “Aidar” battalions are notable. The former was proclaimed as a Territorial Defence Battalion, but was not included among such battalions. The battalion was later integrated into the National Guard as a reserve battalion (Militaryland, n.d.).

Thus, the volunteer paramilitary formations in Ukraine, born of the inadequacy of state structures to address new threats, were diverse in nature, structure, and departmental subordination. Over the course of their development, a number of them underwent transformations: expanding into larger formations or, conversely, merging with others, changing departmental subordination, restructuring, and even disbanding. Most of the volunteer units were integrated into various state security agencies.

After the introduction of martial law, DFTG was transitioned to the operational control of the military units of the territorial defence forces, therefore rendering them a part of the official defence system with appropriate budgetary support. With state approval of the creation and growth of civilian militias to support the national army, the number of militia troops has increased by 100,000 over a three-year period. The new Territorial Defence Brigades are state-controlled, locally organised volunteer organisations that recruit from civilians and reservists, in contrast to the “grassroots troops” of 2014. Local self-defence is overshadowed by the territorial defence forces and the far more well-known paramilitary volunteer organisations (volunteer battalions) such as “Azov”. Furthermore, local self-defence is a unique political phenomena that is not related to any other volunteer activity. Local self-defence was created to ensure resilience of homeland and communities in disaster situations.

The term “territorial defence” is a simplified form of the term “voluntary paramilitary formation of a territorial community”. According to the Law of Ukraine No. 1702-IX (2021), territorial defence is a holistic system that consists of three components – military, civilian, and military-civilian. The military component of territorial defence includes military command bodies, military units of the territorial defence forces of the Armed Forces of Ukraine and other forces and means of security forces and defence forces. The civilian component includes state bodies and local self-government bodies. At the same time, the VFTCs are included in the military-civilian component, which also covers the headquarters of the territorial defence zones (districts) (Fig. 2). The difference between the territorial defence forces and volunteer paramilitary formations of territorial communities is firstly determined in the procedure for their formation and staffing. The territorial defence forces are staffed in peacetime with military personnel

under contract and conscripted officers, and in a special period – with military personnel under contract, conscripted officers, and territorial reserve. Staffing of volunteer formations of territorial communities is conducted voluntarily. Accordingly, a member of the territorial defence forces can terminate the contract at any time, even during martial law. Employees of the territorial defence forces do not have such an opportunity. Moreover, an age limit is established for employees of the territorial defence forces – 60 years (in certain cases 65 years), while there are no such restrictions for employees of VFTCs. Notably, participation in the VFTC does not exempt from the obligation to perform military service upon conscription during mobilisation. That is, if necessary, VFTC participants can be drafted to military units of the territorial defence forces and other components of the defence forces on a territorial basis, if they are fit in terms of health and have a military-accounting specialty.

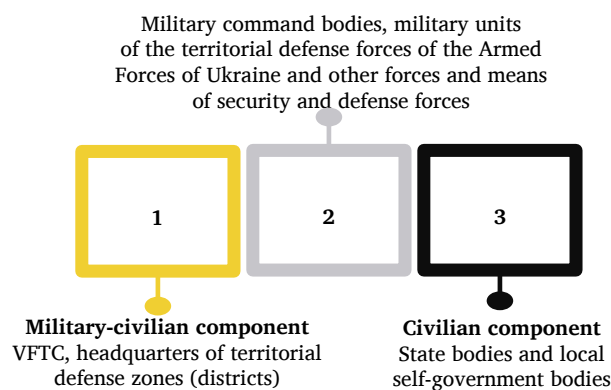


Figure 2. Role of VFTC in military-civilian territorial administration
Source: compiled by the authors

A territorial community on its territory may form several voluntary paramilitary formations, incorporating resource and human capabilities. A voluntary formation is formed by a meeting of an initiative group of residents of a territorial community. The meeting is considered eligible if at least five people participate in it, as well as the commander of a military unit of the territorial defence forces of the Armed Forces of Ukraine and representatives of the local self-government of the relevant territorial community. Therefore, five people can initiate the formation of a VFTC.

Conceptually, voluntary formation of a territorial community is a paramilitary unit formed on a voluntary basis from citizens of Ukraine living within a certain territorial community to perform tasks of territorial defence. VFTCs participate in the protection of public order, protection of infrastructure facilities, air defence and preparation of the population for national resistance. VFTCs participants undergo selection, conclude a volunteer contract, and retain their job and salary. The main functions of the VFTC are as follows:

1. Defence and security: protection of the community territory, protection of important objects, creation of checkpoints and patrolling.

2. Air defence: mobile fire groups are created within the VFTC to detect and neutralise enemy air targets, in particular UAVs.

3. Training of the population: participation in training the population for national resistance.

4. Activities within the Armed Forces of Ukraine: members of the VFTC can be drafted into the ranks of the Armed Forces of Ukraine and replenish their personnel.

The mechanisms of state management of voluntary formations of territorial communities include the conclusion of contracts by volunteers, control by the local military administration, and coordination with the territorial defence forces of the Armed Forces of Ukraine. The logistical support and financing of the activities of the VFTC are provided at the expense of the state budget, local budgets, and other sources not prohibited by the legislation of Ukraine. A clearer definition of the powers of local self-government bodies is contained in the Budget Code of Ukraine (2010). Article 91 of the Budget Code provides that all local budgets may finance measures on territorial defence and local mobilisation training. Given the provisions of paragraph 2 of Article 4, which provides that if another regulatory legal act defines budgetary relations differently than in this Code, the relevant provisions of this Code shall apply. Therefore, measures on territorial defence are financed from the local budget.

The VFTC is provided with individual standard weapons and ammunition by the Armed Forces of Ukraine, however, in the public domain, there are no detailed procedures for financing and providing the VFTC with weapons. Members of the VFTC have the right to use personal hunting weapons, small arms, other types of weapons and ammunition for territorial defence tasks (self-defence, repelling and deterring armed aggression) following the procedure approved by the Resolution of the Cabinet of Ministers of Ukraine No. 1448 (2021). The volunteer formation is conducted under the direct leadership and control of the commander of the military unit of the territorial defence forces of the Armed Forces on a territorial basis. In the event of martial law in Ukraine or in its individual localities, all volunteer formations of territorial communities are transferred to the operational subordination of the commanders of the relevant military units of the territorial defence forces of the Armed Forces of Ukraine.

Paramilitary forces and security sector transformation in Iraq

After the United States invasion of Iraq in 2003, the Iraqi security sector came under significant pressure to undergo reform. Despite years of efforts by international partners to modernise the armed forces and police, no programme succeeded in adapting to the country's complex realities. Iraq's formal and informal sectors are intertwined in a complicated framework. This is relevant for the security forces as well. In the period following 2003, numerous paramilitary formations emerged, linked to various political, religious, and ethnic groups. Some operated autonomously, while

others maintained formal ties to the state. This became particularly evident after the withdrawal of US forces in 2011, when the resulting security vacuum strengthened the role of non-state armed actors. The officially recognised Iraqi military and hundreds of paramilitary organisations with different affiliations and objectives that have been formally and unofficially integrated into the Iraqi security sector make up the country's armed forces.

When Islamic State (IS) militants began seizing substantial territory, Grand Ayatollah Ali al-Sistani issued a fatwa urging citizens to defend the country. This did not create new groups *ex nihilo*, but it consolidated existing armed formations and encouraged the emergence of new volunteer units. Building on these structures, the Popular Mobilisation Forces (al-Hashd al-Shaabi/PMF) were established. The creation of the PMF was used by a network of military groups to bolster the pre-existing security forces through coordination at the national, regional, and local levels while maintaining a high degree of autonomy. This was necessary as the state-sponsored military forces in Iraq were unable to accumulate the required manpower to counter the growing threat of IS (Cherry, 2020).

These groups had a variety of relationships, including ties to nations such as Iran and Shia or Sunni leaders. Misunderstandings amongst international parties attempting to implement security sector reform in Iraq have arisen due to the continued ties with religious institutions of the founders of paramilitary groups. Despite being mostly composed of paramilitary organisations with Shia affiliations, the Popular Mobilisation Forces (PMF) should not be viewed as a religiously and sectarianism-based organisation. Instead, following the requirements of various groups and geographical areas across the nation, the PMF is representative of the various cultures and groups that are present across Iraq. Notably, not all of these PMF paramilitary groups share a Shia ideology. There are PMF factions that represent Christian, Yazidi, and Sunni groups. However, because many of these paramilitary organisations function as policing units in tandem with the official national police and army, they could be a threat to the reform of the security sector.

Since 2015, the al-Hashd al-Shaabi have strengthened their hold on political authority and extended their sway outside the scope of regional paramilitary groups. Iraqi elites have risen to power as politicians and paramilitary leaders due to their desire for political success while maintaining their independence through paramilitary forces. After the Islamic State's defeat in 2017, the Iraqi government has institutionalised the al-Hashd al-Shaabi forces, creating an official, highly independent security actor with political influence and access to state finances. Paramilitary forces in Iraq became substantial in the national security, especially in locations outside the capital where Islamic State extremists were still active.

The PMF's involvement in the Iraqi security sector has grown over time. An estimated 150,000 combatants were enlisted in the PMF in 2019, but only 122,000 of them were authorised to receive a national income

(Cherry, 2020). Tens of thousands of fighters have been officially registered into the national security system and were paid by the government for their participation in paramilitary groups through the PMF Commission and the Iraqi Ministry of Finance, even though the actual number of fighters who identify as PMF members may be much higher.

Since IS's demise in 2017, paramilitary leaders have gained more confidence within the Iraqi Army and in national politics. The nation held its first national elections since the collapse of IS in 2018, and they were a highly contested event. With over 20 factions of the PMF forming an alliance with the Fatah Alliance, led by Hadi Amiri, the former Minister of Transport and head of the Badr Organisation (another paramilitary group) within parliament, the election results amply illustrated the power of the PMF forces in the nation. The result of this broad alliance showed the PMF's increasing political clout and capacity to obtain popularity. The PMF evolved into an influential actor in Iraq's domestic politics, drawing on both state and non-state mechanisms of legitimacy.

Despite their formal integration, the PMF remain a highly autonomous structure. Their close ties to religious and political centres outside the state complicate the implementation of reforms proposed by the international community. In several regions, the PMF effectively perform the functions of both police and army, creating parallel mechanisms of authority.

Despite their formal integration into the security sector, the PMF maintain a complex and multi-layered system of financing that significantly contributes to their autonomy and political influence. Their primary source of funding is the Iraqi state budget: each year, parliament allocates substantial resources for the upkeep of forces, including salaries, equipment, and administrative costs, rendering the PMF an officially recognised beneficiary of public expenditure. In 2024, the PMF budget exceeded 4.5 trillion Iraqi dinars, reflecting their growing institutional weight (Rudaw, 2024). At the same time, studies of Arab Gulf States Institute (2022) highlighted the existence of parallel, informal revenue streams, including control over border crossings, logistical hubs, the collection of "security fees", and involvement in grey-market economic activities. The combination of formal state financing and informal economic flows provides the PMF with a high degree of material self-sufficiency, complicating governmental oversight. Thus, paramilitary formations have become an integral element of Iraq's contemporary security landscape, while simultaneously constituting one of the principal challenges to long-term stabilisation and security-sector reform.

Overall synthesis and implications

A comparative examination of the United States, Ukraine and Iraq revealed several structural tendencies that characterise contemporary paramilitarism, despite the profound differences in their political systems, security environments and historical trajectories. Across all three contexts, the boundaries between state and non-state armed actors

have become increasingly blurred. In the United States, the coexistence of federally controlled National Guard units, state-level defence forces and privately organised militia groups overlap spheres of authority and hybrid modes of security provision. In Ukraine, volunteer battalions emerged as de facto substitutes for state capacity during the initial stages of the 2014 conflict and were only later incorporated into formal structures, while local territorial defence formations continue to operate in a hybrid military-civilian format. In Iraq, the Popular Mobilisation Forces are the most pronounced example of a formally state-recognised yet substantively autonomous paramilitary system, one that operates simultaneously inside and outside state hierarchies.

A second cross-cutting tendency concerns fragmentation and the proliferation of competing power centres. In all three cases, the emergence or empowerment of paramilitary formations was initially justified as a rapid and cost-effective response to acute security threats. However, once institutionalised, these structures often evolved into semi-permanent actors with internal organisational interests, political ambitions and territorial bases of authority. This has been particularly evident in Iraq, where PMF factions have consolidated political influence and economic resources, and in the United States, where private militias increasingly act as self-legitimised guardians of public order, sometimes in tension with state authorities. In Ukraine, fragmentation is evident in divergent trajectories of volunteer units – from formal integration to disbandment due to criminal activity – demonstrating the difficulty of managing heterogeneous paramilitary groups during prolonged conflict.

A further unifying theme is the complexity of financing paramilitary structures. Although formal mechanisms exist, such as federal and state appropriations for US National Guard and SDFs, Ukrainian budgetary provisions for territorial defence forces and DFTG units, or direct Iraqi Ministry of Finance allocations to the PMF – these rarely represent the full spectrum of resources. In Iraq, for example, substantial off-budget funding streams such as control over border checkpoints, security levies and informal economic activities enhance the autonomy of paramilitary actors and reduce the leverage of the central state. In Ukraine, volunteer units historically depended partly on private donations and local community support, which contributed to their early operational effectiveness but also to their structural heterogeneity. In the United States, private militias rely on decentralised funding mechanisms that require no governmental accountability. Together, these patterns illustrate how financial pluralism strengthens paramilitary resilience but complicates efforts at oversight, reform and demobilisation.

These empirical patterns correspond to theoretical debates within security studies. The widening civil-military gap, highlighted by scholars such as D. Stanar (2020), is reinforced when paramilitary structures operate at the interface of civilian communities and formal armed forces. Volunteer formations may strengthen societal resilience, yet they also risk normalising militarised citizenship and eroding civilian oversight. The contrast between state-centric

paramilitary models and decentralised or politically instrumentalised models underscores divergent approaches to management of non-state force. Decentralised models offer flexibility and rapid mobilisation but tend to carry higher risks of political capture, extremism or fragmentation. Reliance on militias as a strategic tool, whether for territorial defence, counterinsurgency or local security governance, has well-documented long-term consequences, including weakened state authority, contested sovereignty and the entrenchment of armed non-state intermediaries within political processes. Collectively, these findings highlight paramilitarism not as an aberration but as an increasingly institutionalised feature of modern security governance.

■ Discussion

A comparison of the three case studies revealed a range of critical implications for policymakers and practitioners in cross-cutting ways: 1) increased fragmentation and lack of control; 2) blurred distinctions between state and non-state entities; 3) competition for governance; 4) economic incentives; and 5) diversity and division in PGMs. PGMs are no longer one-time responses to insecurity; rather, they are becoming an increasingly permanent component of conflict landscapes in the twenty-first century. Their utility is crucial, being related the main sources of power and the surrounding region. Such conclusions are confirmed by numerous studies.

A. Day (2020) analysed how paramilitary organisations and militias influence post-conflict transitions. The study claimed that government cooperation with pro-government militias has been a factor in over 80% of conflicts over 1990-2020, and that the emergence of transnational violent extremist groups has led to an even greater reliance on PGMs in countries such as Syria, Afghanistan, Iraq, Somalia, and Nigeria. Auxiliary forces were central in assisting governments retake land, counter rebel forces, and consolidate military strength. They are a rapid and inexpensive way to mobilise force and may provide unique local expertise and intelligence, increasing traction among contested groups or constituencies. Based on extensive field study in Nigeria, Somalia, and Iraq, the study determined the role of PGMs in conflict and post-conflict settings. The study emphasised how PGMs may benefit or harm prospects for long-term peacebuilding. The study highlighted that, while each country is unique in terms of the nature of its conflict and how PGMs have been used, they contain common characteristics.

B. Onamu & I. Nyadera (2024) examined the role and impact of paramilitary groups in domestic politics, as well as how their engagement leads to political (un)stability. The study addressed how the interactions between Sudan's Rapid Support Forces, a paramilitary group, and the Sudan Armed Forces have resulted in a humanitarian catastrophe following the fall of Omar Al Bashir in 2019. The study stated that the development of paramilitary groups is intended to safeguard the government from internal and external dangers, but these groups can shift or withdraw

their commitment to the political leadership. According to the authors, such a change increases the probability of conflict between paramilitary and regular troops, leaving civilians vulnerable to mass murder and war crimes. The study analysed the history, distribution, and operations of militia groups both internationally and regionally. Moreover, the study examined Sudan's past and present encounters with paramilitary organisations. The study determined that their behaviours during a crisis are influenced by the paramilitary troops' favourable treatment.

The common assumption has been that paramilitary units are developed to assist efforts of regular forces in maintaining stability and addressing internal and foreign threats (Böhmelt & Clayton, 2018). Studies have also been conducted to investigate the reason for the development of these paramilitary units (Jentzsch *et al.*, 2015), while others have explored how they can be a barrier to peace (Maher & Thomson, 2018). However, the threat posed by paramilitary groups, particularly in nations where governments are being overthrown by uprisings, remains understudied. Most studies assume that paramilitary groups are loyal to the government as to the founder and support. In fact, a more thorough examination of many situations demonstrated that there are a range of dynamic relations in existence. They may occasionally change based on the political environment and the actors' interests in the paramilitary outfit.

Paramilitary forces' detractors contend that they are a sign of a nation's larger security and governance issues. When these troops are used, it indicates a more substantial threat to the stability of the state and could prolong fighting by escalating already-existing tensions. The creation of paramilitary groups has frequently been used by leaders, particularly in autocratic nations, as a tool to bolster authority and quell opposition. For instance, as noted P. Mutibwa (1992) during the 1970s, Idi Amin of Uganda used paramilitary groups such as the State Research Bureau to consolidate control and suppress political opposition. Amin's reign was characterised by extensive human rights violations, and paramilitary units were central in imposing autocratic authority. Under Robert Mugabe's tenure in Zimbabwe, the formation of paramilitary formations such as the Central Intelligence Organisation (CIO) was critical to preserving political power. These forces were critical in quelling criticism and maintaining the regime's hold on power.

Both democratic and non-democratic nations have witnessed an increase in the number of paramilitary groups in the last several decades. Countries have been prompted to reconsider their security formations and units due to the evolving nature of threats to states, the rise in armed non-state players, and the complexity of war tactics. M. Kandrík (2020) addressed the issue of paramilitarism in Central and Eastern Europe. The study claimed that paramilitarism has made a comeback with new intensity in several countries in Central and Eastern Europe. That such war-related behaviour should emerge in a region often described as relatively peaceful and stable may appear counterintuitive. However, several explanatory factors can

be identified. These include the historical foundations of statehood, as many contemporary organisations draw on the legacy of pre-war predecessors – the sociocultural context marked by perceived insecurity and limited opportunities for individuals interested in military or quasi-military engagement outside professional service, and substantial shifts in the security environment, notably the migration crisis and the war in Ukraine. Across this spectrum – from vigilante groups involved in migrant “hunting” to self-defence militias, state-aligned formations, and paramilitary organisations formally incorporated into national security structures – paramilitarism in Central and Eastern Europe constitutes a highly heterogeneous phenomenon. There are two distinct models in the region: the state-centric and pro-social model in the Baltic countries, and the decentralised and often extremist-influenced model, with Poland and Ukraine as exceptions. To counteract the negative effects of paramilitarism and capitalise on its advantages, both models advocate for different sets of government strategies. For example, the risk of providing extremists with military training and structures rather than increasing the number of potential recruits for the defence of the nation and improving relations of young people with communities through civic-patriotic education. The significance of the state’s participation is illustrated by the experiences of Lithuania, Poland, and Latvia. Those interested in military action should have access to territorial armies, active reserves, and national guards, but not as a full-time job. These offer a possibility for citizens to voluntarily participate in defence, which can satisfy such people in a context that is lawful, professional, and under state control.

Outside structural and political explanations, studies highlight the significance of individual-level psychological and moral factors that shape engagement in paramilitary formations. A growing number of empirical studies demonstrate that participation in such groups is not merely a reaction to security deficits or political grievances but is also a moral, identity dynamic and personality trait issue. P. Kosnáč *et al.* (2023), analysing the Slovak paramilitary organisation Slovenskí Branci, demonstrated that members exhibit distinct moral foundations, elevated group-based loyalty and particular personality profiles compared to the general population. These findings reinforce the view that paramilitary activism is sustained not only by political opportunity structures but also by psychosocial predispositions that make certain individuals more receptive to militarised forms of collective action. Integration of this dimension is essential for determination of why paramilitary mobilisations persist even in relatively stable environments and why they often acquire cohesive internal cultures that strengthen organisational resilience.

There will always be a willingness to use civic voluntary involvement as a crucial auxiliary component of the larger defence system, even when states use professional military forces as their primary means of national defence. This position has several significant causes. The problem of the civilian-military divide is a topic of significant scholarly

and military professional debate (Stanar, 2020). There is minimal cooperation between the professional military and civilian sectors as a result of the professionalisation of the armed forces and the increasing commercialisation of defence and security issues. This is a significant departure from the past, when both military and paramilitaries were natural components of society and were frequently central in establishing national identity.

Paramilitary groups, both state and non-state, can serve as a bridge connecting the civilian and professional military spheres of society. They can unite military and civilian expectations, desires, and concerns in meaningful and complementary ways due to varied experience. Political leaders must be aware of this to make judgments about defence and security, as well as to acquire and keep the support of the public for any necessary security reforms or plans for military modernisation. In addition to the direct deployment of paramilitary organisations as an armed entity, which is frequently of limited use and not their primary purpose, they can engage in a wide range of activities, such as training, education, preparation, advocacy, and the popularisation and promotion of patriotic sentiments, citizen responsibilities, and military matters.

Meanwhile, public management policy should carefully analyse the evolution within the declared principles and practical functioning of paramilitary groups, including under the prospective view angle. Notably, there are no universal patterns of paramilitary emerging and functioning, and overall nation-state specific landscape, as well as “current moment” political and societal situation are factors of crucial influence. Paramilitaries can become both a policy tool and national security danger, which necessitates application of a kind of design-thinking approach from public administration institutions.

■ Conclusions

The study examined the origins, roles, functions and security implications of paramilitary voluntary territorial formations in contemporary nation-states. By analysing the United States, Ukraine and Iraq through an integrative review framework, the research explored how paramilitary structures emerge, transform and interact with state institutions, and what governance challenges and opportunities they generate. The multi-layered analysis revealed several consistent tendencies across cases, including blurred boundaries between formal and informal security structures, the proliferation of competing power centres, and the growing political relevance of paramilitary actors. These findings collectively demonstrated that there is no universal pattern of paramilitarism; instead, each national context produces internal hybrid configurations shaped by political culture, security pressures and institutional capacity.

These can have various organisational structures, sizes, and shapes, various financing sources and patterns. There are instances of effective state, semi-state, and non-state programs that involve people who are already involved in or interested in paramilitary groups. These organisations

can influence their surroundings, create more defence potential, directly and indirectly serve the national defence system, and improve societal stability in general. The phenomenon of paramilitarism is dynamic and complex.

A state can substantially benefit from self-organised citizen volunteers interested in defence and security. At the community level, the analysis showed that local self-defence initiatives play an important role in resilience and crisis response, but their paramilitary nature necessitates strategic state management to amplify benefits and minimise risks. There must be a clear legal framework in place that eliminates any room for doubt regarding the legitimacy of paramilitary or quasi-paramilitary groups and their operations.

Effective state-aligned models demonstrate that, under appropriate legal and institutional frameworks, paramilitary or quasi-paramilitary groups may enhance defence capacity, strengthen community resilience, and contribute

to stability. At the same time, their dynamic and complex nature requires careful management aimed at mitigating risks such as fragmentation, political instrumentalisation and challenges to state authority. Future research should address remaining gaps, particularly the need for systematic empirical data on paramilitary dynamics, deeper examination of financing mechanisms, and studies on how hybrid armed actors affect state capacity, democratic oversight and regional security in the long term.

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■ **Анотація.** Із загостренням глобальних викликів безпеці національні держави все частіше стикаються з активним розвитком феномену парамілітарних формувань. Для України в умовах російсько-української війни це питання набуло особливого значення. Метою статті було дослідити організацію, призначення, управління та фінансування добровільних територіальних громадських формувань як парамілітарних груп, а також пояснити особливості їх функціонування та наслідки їх діяльності для суспільства, зокрема приховані, не очевидні на перший погляд. Було застосовано методологію інтегративного огляду в поєднанні з елементами методу кейс-стаді. Аналіз висвітлив глобально значущі, але національно специфічні форми парамілітарних територіальних груп у національних державах. На основі теоретичних підходів та емпіричних даних, включно з аналізом діяльності таких груп у США, Україні та Іраку, досліджено переваги й виклики, які добровільні парамілітарні формування створюють для національної безпеки. Результати дослідження чітко показують, що стратегія боротьби з парамілітаризмом повинна враховувати як позитивні, так і негативні аспекти цього явища, уникаючи універсальних рішень для вирішення відповідних проблем. Для визначення характеру будь-якої парамілітарної групи, необхідно розробити критерії, порогові значення та методи оцінки. Держава може отримати потенційну вигоду від самоорганізованих громадян-добровольців, зацікавлених у питаннях оборони та безпеки, але для належного використання цього ресурсу необхідно забезпечити чіткість законодавчої бази та механізмів фінансування парамілітарних угруповань, а також визначити їхню роль у забезпеченні національної безпеки, в тому числі в довгостроковій перспективі. Практична цінність дослідження полягає у формуванні аналітичної бази для оцінки загальної ролі воєнізованих формувань добровільних територіальних громад у безпековому ландшафті країн у динамічних умовах гібридної війни та гібридного миру

■ **Ключові слова:** парамілітарні формування; гібридна війна; державна безпека; місцеві бюджети; місцеві громади