

THE PROSECUTOR OF THE TRIBUNAL

AGAINST

**Blagoje SIMIC**  
**MILAN SIMIC**  
**MIROSLAV TADIC**  
**SIMO ZARIC**

FOURTH AMENDED INDICTMENT

The Prosecutor of the International Criminal Tribunal for the former Yugoslavia, pursuant to her authority under Article 18 of the Statute of the Tribunal charges:

**Blagoje SIMIC,**  
**Milan SIMIC,**  
**Miroslav TADIC,**  
**Simo ZARIC**

with **crimes against humanity, GRAVE BREACHES** of the **GENEVA CONVENTIONS** of 1949 and **VIOLATIONS OF THE LAWS and CUSTOMS OF WAR**, as set forth below:

**The Accused**

1. **Blagoje SIMIC**, born in 1960, is a medical physician from Kruskovo Polje, Bosanski Samac municipality. From 1991 to 1995, **Blagoje SIMIC** was president of the Serbian Democratic Party (SDS) in Bosanski Samac. **Blagoje SIMIC** was Vice-Chairman of the town assembly from 1991 through 17 April 1992, and from 4 November 1991 through at least 30 November 1992, he was the Deputy of the Assembly of the self-declared "Serb Autonomous Region of Northern Bosnia," later called the "Serb Autonomous Province of Semberija and Majeвица," of the "Serb Republic of Bosnia and Herzegovina." On or about 17 April 1992, **Blagoje SIMIC** was appointed President of the Serb Crisis Staff in the "Serbian Municipality of Bosanski Samac." On or about 21 July 1992, the Crisis Staff was re-named the "War Presidency of the Serbian Municipality of Bosanski Samac," and **Blagoje SIMIC** was named President of the War Presidency. On or about 22 January 1993, **Blagoje SIMIC** was elected President of the "Samac Municipal Assembly" and served in that position until after the announcement of the original indictment in this case. In each of these positions beginning on or about 17 April 1992, and at all times material to this indictment, **Blagoje SIMIC** was the highest ranking civilian official in the municipality of Bosanski Samac.

2. **Milan SIMIC**, born 9 August 1960 in Sarajevo, was trained as an economist and worked for a

variety of companies in Bosanski Samac. At the time of the forcible take-over of Bosanski Samac, he was a member of the Fourth Detachment, a JNA-organised territorial defence unit. On 30 May 1992, **Milan SIMIC** was appointed President of the Executive Board of the Bosanski Samac Assembly and became a member of the Serb Crisis Staff. As President of the Executive Board, **Milan SIMIC** was responsible for the governmental affairs of the municipality which included implementing the social plan, annual budget and financial reports, overseeing municipal housing and city planning needs, and implementing the policies, decisions and other regulations of the Serb Crisis Staff and War Presidency. **Milan SIMIC** was released from this position on or about 24 June 1993 after being shot and seriously wounded in an assassination attempt.

3. **Miroslav TADIC**, also known as Miro Brko, born 12 May 1937 in the village of Novi Grad, Odzak municipality, worked as a high school teacher and later ran the cafe "AS" at his home in Bosanski Samac. In 1991 **Miroslav TADIC** became a member of the Fourth Detachment, a JNA-organised territorial defence unit. As the Assistant Commander for Logistics, he worked closely with **Simo ZARIC** in their respective roles within the Fourth Detachment. After 17 April 1992, **Miroslav TADIC** became Chairman of the Bosanski Samac "Exchange Commission" and was responsible for organising and carrying out the majority of so-called prisoner "exchanges" through which non-Serb civilians were expelled from their homes. He remained a member of the Exchange Commission until at least 1995. While serving in the capacity of Chairman of the Exchange Commission, **Miroslav TADIC** also was a member of the Serb Crisis Staff.

4. **Simo ZARIC**, also known as Solaja, born 25 July 1948, in the village of Trnjak, Odzak municipality, is a former police chief of Bosanski Samac and a former intelligence agent for the State Security Service (SDB). In 1991, **Simo ZARIC** began to organise and supervise a JNA-sponsored territorial defence unit known at first as the Fourth Detachment and later renamed the 5th Battalion of the 2nd Posavina Brigade. Upon creation of the Fourth Detachment, **Simo ZARIC** was appointed the "Assistant Commander for Intelligence, Reconnaissance, Morale and Information." On 29 April 1992, **Simo ZARIC** was appointed "Chief of National Security Service" for Bosanski Samac by the Serb Crisis Staff. After the Serb take-over of Odzak in July 1992, **Simo ZARIC** was appointed by the Bosanski Samac Crisis Staff to be the "Deputy to the President of the War Council for Security Matters" of the Odzak municipality. In these positions of authority, **Simo ZARIC** reported directly to and took orders from the Serb Crisis Staff in Bosanski Samac. On 1 September 1992, **Simo ZARIC** was appointed "Assistant Commander of the 2nd Posavina Brigade for Morale and Information" of the Bosnian Serb Army. Between April and July, 1992, **Simo ZARIC** worked with **Miroslav TADIC** to arrange so-called prisoner "exchanges" through which non-Serb civilians were expelled from their homes. **Simo ZARIC** remained a member of the Bosnian Serb Army until 1995.

## **INDIVIDUAL CRIMINAL RESPONSIBILITY**

5. Each of the above accused is individually responsible for the crimes alleged against him in this indictment, pursuant to Article 7(1) of the Tribunal Statute. Individual criminal liability includes planning, instigating, ordering committing or otherwise aiding and abetting the planning, preparation or execution of any crime referred to in Articles 2 to 5 of the Statute of the Tribunal.

## **General LEGAL Allegations**

6. Unless otherwise set forth above, all acts and omissions alleged in this indictment took place between in or about September 1991 and on or about 31 December 1993 in the Republic of Bosnia and Herzegovina in the territory of the former Yugoslavia.

7. At all times relevant to this indictment, a state of armed conflict and partial occupation existed in the Republic of Bosnia and Herzegovina.
8. At all times relevant to this indictment, all of the persons described in this indictment as victims were protected by the Geneva Conventions of 1949.
9. Each of the accused in this indictment was required to abide by the laws and customs governing the conduct of war, including the Geneva Conventions of 1949.
10. All acts and omissions charged as crimes against humanity were part of a widespread or systematic attack against the Bosnian Croat and Bosnian Muslim civilian residents of the municipalities of Bosanski Samac and Odzak.
11. In each paragraph charging torture, the acts were committed by, or at the instigation of, or with the consent or acquiescence of, an official or person acting in an official capacity, and for one or more of the following purposes: to obtain information or a confession from the victim or a third person; to punish the victim for an act the victim or a third person committed or was suspected of having committed; to intimidate or coerce the victim or a third person; and/or for any reason based upon discrimination of any kind.
12. Paragraphs 6 through 11 are re-alleged and incorporated into each of the charges set forth below.

## **CHARGES**

### **COUNT 1** (Persecutions)

13. Beginning in or about September 1991 and continuing through at least 31 December 1993, **Blagoje SIMIC, Milan SIMIC, Miroslav TADIC, and Simo ZARIC**, acting in concert together, and with other Serb civilian and military officials, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of a crime against humanity, that is, the persecutions of Bosnian Croat, Bosnian Muslim and other non-Serbcivilians on political, racial, or religious grounds, throughout the municipalities of Bosanski Samac, Odzak and elsewhere in the territory of Bosnia and Herzegovina.
14. The crime of persecutions was perpetrated, executed and carried out by or through the following means:
  - a. the forcible take-over by Serb forces of cities, towns and villages inhabited by Bosnian Croat, Bosnian Muslim and other non-Serb civilians;
  - b. the unlawful arrest, detention or confinement of Bosnian Croats, Bosnian Muslims and other non-Serb civilians on political, racial or religious grounds and not for their protection and safety;
  - c. the cruel and inhumane treatment of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including beatings, torture, forced labour assignments and confinement under inhumane conditions;
  - d. the deportation, forcible transfer and expulsion of Bosnian Croats, Bosnian Muslims and other non-Serb civilians from their homes and villages by force, intimidation and coercion; and
  - e. the wanton and extensive destruction, plundering and looting of the property of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including dwellings, businesses, personal property

and livestock.

f. the destruction or willful damage of institutions dedicated to religion, namely two Catholic churches, one in the town of Bosanski Samac about and between August 1992 and January 1993 and the other in the village of Hrvatska Tisina, about and between April 1992 and August 1992, and two mosques, one in the town of Bosanski Samac about and between August 1992 and November 1992 and the other in the town of Odzak, in or about July 1992.

15. From on or about 17 April 1992 through at least 31 December 1993, **Blagoje SIMIC**, both prior to and while serving as President of the Bosanski Samac Serb Crisis Staff and as President of the War Presidency, acting in concert with others, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the crime of persecutions as described in paragraphs 13 and 14 above, through his participation in the following acts or omissions, among others:

- a. the forcible take-over of the municipality of Bosanski Samac by Serb forces;
- b. the issuance of orders, policies, decisions and other regulations in the name of the Serb Crisis Staff and War Presidency and the authorisation of other official actions which violated the rights of the Bosnian Croat, Bosnian Muslim and other non-Serb civilians to equal treatment under the law and infringed upon their enjoyment of basic and fundamental rights;
- c. the unlawful arrest, detention or confinement of Bosnian Croats, Bosnian Muslims and other non-Serb civilians on political, racial or religious grounds and not for their protection and safety;
- d. the cruel and inhumane treatment of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including beatings, torture, forced labour assignments and confinement under inhumane conditions;
- e. the deportation, forcible transfer and expulsion of Bosnian Croats, Bosnian Muslims and other non-Serb civilians from their homes and villages by force, intimidation and coercion; and
- f. the wanton and extensive destruction, plundering and looting of the property of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including dwellings, businesses, personal property and livestock.
- g. the destruction or willful damage of institutions dedicated to religion, namely two Catholic churches, one in the town of Bosanski Samac about and between August 1992 and January 1993 and the other in the village of Hrvatska Tisina, about and between April 1992 and August 1992, and two mosques, one in the town of Bosanski Samac about and between August 1992 and November 1992 and the other in the town of Odzak, in or about July 1992.

16. From on or about 17 April 1992 through February 1993, **Milan SIMIC**, both prior to and while serving as President of the Executive Board of the Bosanski Samac Assembly and as a member of the Serb Crisis Staff, acting in concert with others, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the crime of persecutions as described in paragraphs 13 and 14 above, through his participation in the following acts or omissions, among others:

- a. the implementation of orders, policies, decisions and other regulations promulgated by the Serb Crisis Staff and War Presidency and the authorisation of other official actions which violated the rights of the Bosnian Croat, Bosnian Muslim and other non-Serb civilians to equal treatment under the law and infringed upon their enjoyment of basic and fundamental rights;
- b. the unlawful detention and confinement of Bosnian Croats, Bosnian Muslims and

other non-Serb civilians under inhumane conditions on political, racial or religious grounds and not for their protection and safety;

c. the torture and beating of Bosnian Croats, Bosnian Muslims and other non-Serb civilians confined at detention camps, including but not limited to Hasan Bicic, Muhamad Bicic, Perica Misic, Ibrahim Salkic and Safet Hadzialijagic.

17. From about September 1991 to at least 31 December 1993, **Miroslav TADIC**, both prior to and while serving as a member and as Chairman of the Exchange Commission and as a member of the Serb Crisis Staff, acting in concert with others, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the crime of persecutions as described in paragraphs 13 and 14 above, through his participation in the following acts or omissions, among others:

- a. the forcible take-over of the municipality of Bosanski Samac by Serb forces;
- b. the unlawful arrest and confinement of numerous Bosnian Croat, Bosnian Muslim and other non-Serb civilians on political, racial or religious grounds and not for their protection and safety;
- c. the cruel and inhumane treatment of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including beatings, torture, forced labour assignments and confinement under inhumane conditions;
- d. the deportation, forcible transfer and expulsion of Bosnian Croats, Bosnian Muslims and other non-Serb civilians, including women, children and the elderly, from their homes and villages by force, intimidation and coercion; and
- e. the wanton and extensive destruction, plundering and looting of the property of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including dwellings, businesses, personal property and livestock.
- f. the destruction or willful damage of institutions dedicated to religion, namely two Catholic churches, one in the town of Bosanski Samac about and between August 1992 and January 1993 and the other in the village of Hrvatska Tisina, about and between April 1992 and August 1992, and two mosques, one in the town of Bosanski Samac about and between August 1992 and November 1992 and the other in the town of Odzak, in or about July 1992.

18. From about September 1991 to about 31 December 1992, **Simo ZARIC**, both prior to and while serving in such various positions as the “Assistant Commander for Intelligence, Reconnaissance, Morale and Information” of the Fourth Detachment, “Chief of National Security Service” in Bosanski Samac, “Deputy to the President of the War Council for Security Matters” in Odzak and “Assistant Commander of the 2nd Posavina Brigade for Morale and Information,” acting in concert with others, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the commission of the crime of persecutions as described in paragraphs 13 and 14 above, through his participation in the following acts or omissions, among others:

- a. the forcible take-over of the municipality of Bosanski Samac by Serb forces;
- b. the unlawful arrest and confinement of numerous Bosnian Croat, Bosnian Muslim and other non-Serb civilians on political, racial or religious grounds and not for their protection and safety;
- c. the cruel and inhumane treatment of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including beatings, torture, forced labour assignments and confinement under inhumane conditions;
- d. the interrogation of Bosnian Croats, Bosnian Muslims and other non-Serb civilians who had been arrested and detained and forcing them to sign false and coerced statements;

- e. the deportation, forcible transfer and expulsion of Bosnian Croats, Bosnian Muslims and other non-Serb civilians, including women, children and the elderly, from their homes and villages by force, intimidation and coercion; and
- f. the wanton and extensive destruction, plundering and looting of the property of Bosnian Croats, Bosnian Muslims and other non-Serb civilians including dwellings, businesses, personal property and livestock.
- g. the destruction or willful damage of institutions dedicated to religion, namely two Catholic churches, one in the town of Bosanski Samac about and between August 1992 and January 1993 and the other in the village of Hrvatska Tisina, about and between April 1992 and August 1992, and two mosques, one in the town of Bosanski Samac about and between August 1992 and November 1992 and the other in the town of Odzak, in or about July 1992.

19. By these actions **Blagoje SIMIC, Milan SIMIC, Miroslav TADIC,** and **Simo ZARIC,** acting in concert together and with others, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of:

**Count 1:** Persecutions on political, racial and religious grounds, a **CRIME AGAINST HUMANITY**, punishable under Article 5(h) of the Statute of the Tribunal.

### **COUNTS 2 and 3** (Deportation and Transfer)

20. From about 17 April 1992 through about 31 December 1993, **Blagoje SIMIC** planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the unlawful deportation and forcible transfer of hundreds of Bosnian Croat, Bosnian Muslim and other non-Serb civilians, including women, children and the elderly, from their homes in the Bosanski

21. From about 17 April 1992 through about 31 December 1993, **Miroslav TADIC** planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the unlawful deportation and forcible transfer of hundreds of Bosnian Croat, Bosnian Muslim and other non-Serb civilians, including women, children and the elderly, from their homes in the Bosanski Samac municipality to other countries or to other parts of the Republic of Bosnia and Herzegovina not controlled by Serb forces.

22. From about 17 April 1992 through at least 31 December 1992, **Simo ZARIC** planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the unlawful deportation and forcible transfer of hundreds of Bosnian Croat, Bosnian Muslim and other non-Serb civilians, including women, children and the elderly, from their homes in the Bosanski Samac municipality to other countries or to other parts of the Republic of Bosnia and Herzegovina not controlled by Serb forces.

23. By these actions **Blagoje SIMIC, Miroslav TADIC,** and **Simo ZARIC** planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of:

**Count 2:** Deportation, a **CRIME AGAINST HUMANITY**, punishable under Article 5(d) of the Statute of the Tribunal; and

**Count 3:** Unlawful deportation or transfer, a **GRAVE BREACH** of the Geneva Conventions of

1949 (hereafter Grave Breach), punishable under Article 2(g) of the Statute of the Tribunal.

#### **COUNTS 4-6**

(Beatings and Torture of Hasan Bicic, Muhamed Bicic, Perica Mistic, and Ibrahim Salkic)

24. One night between about 10 June and 3 July 1992, in the hallway of the gymnasium of the Bosanski Samac primary school, **Milan SIMIC**, while serving in the position of President of the Executive Board of the Municipal Assembly of Bosanski Samac, and a member of the Serb Crisis Staff, and accompanied by other Serb men, beat Hasan Bicic, Muhamed Bicic, Perica Mistic, and Ibrahim Salkic with a variety of weapons. **Milan SIMIC** kicked Hasan Bicic, Muhamed Bicic, Perica Mistic, and Ibrahim Salkic in their genitals and fired a gun shot over the heads of Hasan Bicic, Muhamed Bicic, Perica Mistic, and Ibrahim Salkic.

25. By these actions, **Milan SIMIC** planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of:

**Count 4:** Torture, a **CRIME AGAINST HUMANITY**, punishable under Article 5(f) of the Statute of the Tribunal;

**Count 5:** Inhumane acts, a **CRIME AGAINST HUMANITY**, punishable under Article 5(i) of the Statute of the Tribunal;

**Count 6:** Cruel treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Article 3 of the Statute of the Tribunal and recognised by Article 3(1)(a) of the Geneva Conventions;

#### **COUNTS 7 - 9**

(Beating and Torture of Safet Hadzialijagic)

26. One night in or about June 1992, in the hallway of the gymnasium building of the Bosanski Samac primary school, **Milan SIMIC**, while in the position of President of the Executive Board of the Municipal Assembly of Bosanski Samac, and a member of the Serb Crisis Staff, and accompanied by other Serb men, kicked Safet Hadzialijagic and beat him repeatedly with a variety of weapons. **Milan SIMIC** placed the barrel of his gun in Safet Hadzialijagic's mouth. During the beating, the other Serb men who accompanied **Milan SIMIC** repeatedly pulled down the victim's pants and threatened to cut off his penis. During the course of the beating, **Milan SIMIC** fired gun shots over the head of Safet Hadzialijagic.

27. By these actions, **Milan SIMIC** planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of:

**Count 7:** Torture, a **CRIME AGAINST HUMANITY**, punishable under Article 5(f) of the Statute of the Tribunal;

**Count 8:** Inhumane acts, a **CRIME AGAINST HUMANITY**, punishable under Article 5(i) of the Statute of the Tribunal;

**Count 9:** Cruel treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Article 3 of the Statute of the Tribunal and recognised by Article 3(1)(a) of the

## **ADDITIONAL FACTUAL ALLEGATIONS**

28. The municipalities of Bosanski Samac and Odzak are located along the northern border of Bosnia and Herzegovina just across the Sava River from the Republic of Croatia. The municipalities are located within an area referred to as the “Posavina Corridor” which links western Bosnia and Herzegovina with Serbia to the east.

29. In 1991, after Slovenia and Croatia declared their independence from the Socialist Federative Republic of Yugoslavia (SFRY), the citizens of Bosnia and Herzegovina were forced to consider whether to declare their independence or to remain a part of Yugoslavia. For the most part Bosnian Croats and Bosnian Muslims favoured independence, while the Bosnian Serbs, led by the Serbian Democratic Party (SDS) and the Yugoslav National Army (JNA) favoured remaining a part of Yugoslavia.

30. Bosnia and Herzegovina declared its independence from Yugoslavia on 29 February 1992. Long before this, however, the SDS and the JNA had been making plans for the probability of a war which included the creation of separate Serb-controlled municipalities throughout Bosnia and Herzegovina. The Republic of Bosnia and Herzegovina was recognised as an independent nation by the United States and countries of the European Community on 7 April 1992.

31. A significant aspect of the plans of the SDS and the JNA was to establish exclusive Serb control over large segments of territory in western, northern and eastern Bosnia and Herzegovina, much of which had large populations of Bosnian Croats, Bosnian Muslims and other non-Serb civilians. In order to achieve control over this territory, the Bosnian Serbs planned to isolate and expel as many non-Serbs as possible in a process that became known as “ethnic cleansing.”

32. Because of their location on the northern edge of the “Posavina Corridor,” control over the municipalities of Bosanski Samac and Odzak was vital to Bosnian Serb efforts to create a Serb-controlled land bridge between Serbia in the east and the Krajina Serbs in Croatia and other parts of western Bosnia and Herzegovina.

33. On 29 February 1992, the Serb authorities announced the formation of a separate “Serbian Municipality of Bosanski Samac.”

34. On 17 April 1992, Serb military forces from Bosnia and Herzegovina and elsewhere in the former Yugoslavia seized control of the town of Bosanski Samac by force and, within a few days, controlled the entire municipality of Bosanski Samac. The Serbs then announced that the government of the municipality of Bosanski Samac had been replaced by the “Serbian Municipality of Bosanski Samac.”

35. Prior to 17 April 1992, almost 17,000 Bosnian Croats and Bosnian Muslims, of a total population of about 33,000, lived in the municipality of Bosanski Samac. Following the forcible take-over of the Bosanski Samac municipality by Serb forces, the majority of the non-Serb residents fled or were forced to leave the area so that by May 1995, fewer than 300 of the 17,000 Bosnian Croat and Bosnian Muslim residents remained.

36. On or about 13 July 1992, the 1st Krajina Corps of the Bosnian Serb Army seized control of the neighbouring municipality of Odzak by force. As the Serb military forces advanced on Odzak, the

majority of the non-Serb residents fled from the area. Those non-Serbs who had not fled before the take-over fled, were killed, or were forced to leave.

37. Prior to July 1992, approximately 22,500 Bosnian Croat and Bosnian Muslim residents, out of a total population of 30,000, lived in the Odzak municipality. In November 1995, at the time of the signing of the Dayton Peace Agreement, virtually all of the 22,500 Bosnian Croat and Bosnian Muslim residents had fled or were forced to leave the Odzak municipality.

38. Immediately after the forcible take-over of the Bosanski Samac municipality, Serb authorities established the "Serbian Municipality of Bosanski Samac Crisis Staff" (Serb Crisis Staff) which took the place of the duly-elected municipal assembly and maintained control over all aspects of the municipal government. In accordance with their plan for "ethnic cleansing," Serb authorities arrested and detained a large number of the non-Serb men, forced many of the non-Serb residents to leave their homes, transferred many non-Serb residents to other villages where they were detained against their will, instituted a number of discriminatory laws and regulations directed against the non-Serbs, required most of the non-Serbs to participate in forced labour projects, undertook the wide-scale looting of the private and commercial property belonging to the non-Serbs, expelled and deported a significant number of the non-Serb residents, and otherwise made life so impossible and oppressive that most Bosnian Croat, Bosnian Muslim and other non-Serb residents of the municipality fled or were forced to leave the area.

39. After the military take-over of the Odzak municipality, the Serb Crisis Staff in Bosanski Samac also assumed control over the civilian government of the Odzak municipality. Although most of the non-Serb residents had fled from the Odzak municipality before the Serb military forces took control, those who remained were subjected to similar acts of discrimination and oppression as those imposed on the non-Serb residents in the Bosanski Samac municipality. Many of the non-Serb residents working on forced labour projects in Bosanski Samac were ordered to take part in looting the private and commercial property of the non-Serb residents of the Odzak municipality.

40. From approximately 1 September 1991 through 31 December 1993, **Blagoje SIMIC, Milan SIMIC, Miroslav TADIC, and Simo ZARIC**, acting in concert together and with various individuals on the Serb Crisis Staff and other political, municipal and administrative bodies, the police force, and the army, committed, planned instigated, ordered or otherwise aided and abetted a campaign of persecutions for the common purpose of ridding the Bosanski Samac and Odzak municipalities of all non-Serbs and in furtherance of the campaign committed other serious violations of international humanitarian law directed against the Bosnian Croat, Bosnian Muslim and other non-Serb civilians residing in the Bosanski Samac and Odzak municipalities in the territory of Bosnia and Herzegovina. Any reference to the words "acting in concert together" shall be restricted to Count 1.

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Carla del Ponte Prosecutor

Dated this Day of January 2002,  
In The Hague,  
The Netherlands