

THE PROSECUTOR OF THE TRIBUNAL
AGAINST
PAVLE STRUGAR
MIODRAG JOKIC
VLADIMIR KOVACEVIC

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 International Criminal Tribunal for the Former Yugoslavia ("the Statute of the Tribunal") charges:

PAVLE STRUGAR, MIODRAG JOKIC and VLADIMIR KOVACEVIC

With VIOLATIONS OF THE LAWS OR CUSTOMS OF WAR as set forth below:

THE ACCUSED:

1. **Pavle STRUGAR** was born on 13 July 1933 in Pec, in present-day Kosovo. He graduated from the Military Academy for Ground Forces in 1952 and was thereafter assigned to various Yugoslav Peoples' Army (the "JNA") posts in the Socialist Republic of Slovenia and the Socialist Republic of Serbia. He subsequently was promoted to Major General and was named Commander of the Military Academy for Ground Forces. In 1989, he was made the Commander of the Territorial Defence forces in the Socialist Republic of Montenegro. In December 1989, he was promoted to Lieutenant General. In October 1991, he was named as the Commander of the Second Operational Group, which was formed by the JNA to conduct the military campaign against the Dubrovnik region of the Republic of Croatia ("Croatia"). In 1993 he was retired from the Yugoslav Army (the "VJ").

2. **Miodrag JOKIC** was born in 1935 in Valjevo municipality, in present-day Serbia. He graduated from the Yugoslav Military-Naval Academy and then served as an officer in various postings with the Yugoslav Navy. In December 1986, he was promoted to the rank of Rear Admiral. In December 1989, he was appointed as the Republican Secretary of National Defence of the Socialist Republic of Serbia. In 1990, he was promoted to Vice Admiral. In 1991 he was named the Commander of the Ninth (Boka) Military Naval Sector (the "Ninth VPS"). In 1992, he retired from the Yugoslav Navy.

3. **Vladimir KOVACEVIC**, also known as "**Rambo**", was born in Niksic, the Socialist Republic of Montenegro, on 15 January 1961. He graduated from the Yugoslav Military Academy for Ground Forces in 1985. In the autumn of 1991, as Captain First Class, he was appointed Commander of the Third Battalion of the JNA 472 (Trebinje) Motorised Brigade. This battalion was subordinated to the command of the Ninth VPS.

INDIVIDUAL CRIMINAL RESPONSIBILITY

4. As commander of the JNA Second Operational Group set up to conduct the Dubrovnik campaign, General **Pavle STRUGAR** exercised both *de jure* and *de facto* power over the forces under his command.

5. As commander of the JNA Ninth VPS, Admiral **Miodrag JOKIC** exercised both *de jure* and *de facto* power over the land and naval forces under his command.

6. As Commander of the Third Battalion, a unit of the Trebinje Brigade subordinated to the command of the Ninth VPS, **Vladimir KOVACEVIC** exercised both *de jure* and *de facto* power over the forces under his command.

7. The various formations and units of the JNA involved in the Dubrovnik campaign were subordinated to the Second Operational Group. The commander of the Operational Group was Lieutenant General **Pavle STRUGAR**. The Operational Group headquarters were located at Trebinje, the Socialist Republic of Bosnia and Herzegovina. The overall structure and the units under the command of the accused are set out in Schedule III, which is attached to and made part of this amended indictment.

8. As officers in command functions in the JNA, **Pavle STRUGAR**, **Miodrag JOKIC** and **Vladimir KOVACEVIC** were bound by the regulations of the JNA as set out in the "Strategy of Armed Conflict" (1983), the "Law on All-Peoples' Defence" (1982), the "Law on Service in the Armed Forces" (1985), the "Rules of Service" (1985), and the "Regulations on the Application of the International Laws of War on the Armed Forces of the SFRY" (1988). These regulations governed the roles and responsibilities of JNA officers, set out their positions in the chain of command and obligated those officers, and their subordinates, to observe the laws of war.

GENERAL ALLEGATIONS

9. All acts and omissions alleged in this amended indictment occurred from 1 October through 31 December 1991 on the territory of Croatia.

10. At all times relevant to this amended indictment, a state of armed conflict existed in Croatia. On 25 June 1991, Croatia declared its independence from the Socialist Federal Republic of Yugoslavia ("SFRY") and became independent on 8 October 1991. Up to and including 7 October 1991, this armed conflict was internal in nature. From 8 October 1991 an international armed conflict and partial occupation existed in Croatia.

11. At all times relevant to this amended indictment, **Pavle STRUGAR, Miodrag JOKIC and Vladimir KOVACEVIC** were required to abide by the laws and customs of armed conflicts, including the Geneva Conventions of 1949 and the Additional Protocols thereto.

12. **Pavle STRUGAR, Miodrag JOKIC and Vladimir KOVACEVIC** are individually responsible for the crimes alleged against them in this amended indictment, pursuant to Article 7(1) of the Statute of the Tribunal. Individual criminal responsibility includes planning, instigating, ordering, committing, or otherwise aiding and abetting in the planning, preparation, or execution of any crimes referred to in Articles 2 to 5 of the Statute of the Tribunal. As to **Pavle STRUGAR, and Miodrag JOKIC** only, by using the word "committed" in this amended indictment, the Prosecutor does not intend to suggest that they physically perpetrated any of the crimes charged personally.

13. **Pavle STRUGAR, Miodrag JOKIC and Vladimir KOVACEVIC** while holding the positions of superior authority as set out in the preceding paragraphs, are also, or alternatively, criminally responsible for the acts of their subordinates, pursuant to Article 7(3) of the Statute of the Tribunal. A superior is responsible for the acts of his subordinate(s) if he knew or had reason to know that his subordinate(s) were about to commit such acts or had done so and the superior failed to take the necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof.

14. For the purpose of this amended indictment, in the expression "acting individually or in concert with others", as referred to **Pavle STRUGAR, Miodrag JOKIC and Vladimir KOVACEVIC**, reference to "others", relates only to the three co-accused and their subordinates or others in that chain of command.

COUNTS:

15. From 1 October 1991 through 31 December 1991, **Pavle STRUGAR, Miodrag JOKIC and Vladimir KOVACEVIC**, acting individually or in concert with others, participated in the below-charged crimes while conducting a military campaign, which was launched on 1 October 1991, directed at the territory of the Municipality of Dubrovnik as it existed in 1991 ("the Dubrovnik region"). This area comprised the coastal regions of Croatia between the town of Neum to the north, the Socialist Republic of Bosnia and Herzegovina to the north and east, and the Montenegrin border to the southeast.

16. JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC and Vladimir KOVACEVIC**, conducted attacks against the Dubrovnik region of Croatia from the Republic of Montenegro, the Socialist Republic of Bosnia and Herzegovina, and from the Adriatic Sea. The forces under their command included regular JNA land and naval units, as well as Territorial Defence units from the Republic of Montenegro and the Socialist Republic of Bosnia and Herzegovina, paramilitary units, police and special police units that were subordinated to the JNA. The land attack was preceded by the imposition of a blockade by the Yugoslav Navy and accompanied by aerial bombardment of communication and electrical facilities. The JNA seized territory to the southeast and northwest of the city of Dubrovnik and effectively surrounded the city itself.

COUNTS 1-3 (MURDER, CRUEL TREATMENT, ATTACKS ON CIVILIANS)

17. The Prosecutor re-alleges and incorporates by reference paragraphs 1-16 in Counts 1-3 .

18. From 1 October 1991 through 6 December 1991, **Pavle STRUGAR and Miodrag JOKIC**, acting individually or in concert with others, planned, ordered, committed, or otherwise aided and abetted in the unlawful artillery and mortar shelling of the city of Dubrovnik conducted by forces under their command. As a result of the unlawful shelling, 42 civilians were killed and one hundred and seventy-seven civilians were wounded. The names of the deceased and wounded are set out in Schedules I and II, respectively, which are attached to and made part of this amended indictment.

19. The acts of shelling the city of Dubrovnik and its environs were perpetrated by JNA troops who controlled the high ground to the east and north of Dubrovnik. From Zarkovica and other locations above Dubrovnik, the JNA forces enjoyed an unobstructed view over the city. From these positions and from naval vessels offshore, the JNA engaged in acts of unlawful shelling of the city. The shelling campaign, as described in paragraph 18, above, included, *inter alia*, the following incidents:

20. On 7 October 1991, JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC**, shelled the town of Mokosica, a residential suburb of Dubrovnik. At the entrance to a civil defence shelter in Mokosica, seven civilians were killed by the JNA shelling. **An additional two civilians were killed in proximity to the same shelter.** The names of the

deceased are set out in Schedule I which is attached to and made part of this amended indictment.

21. From 9 through 12 November 1991, JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC**, unlawfully shelled areas throughout the city of Dubrovnik. Eleven civilians were killed and seventy civilians were wounded by the JNA shelling. The names of the deceased and wounded are set out in Schedules I and II respectively, which are attached to and made part of this amended indictment.

22. On 6 December 1991, JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC**, unlawfully shelled areas throughout the city of Dubrovnik. Twelve civilians were killed and thirty-four civilians were wounded by the JNA shelling. The names of the deceased and wounded are set out in Schedules I and II respectively, which are attached to and made part of this amended indictment.

23. Alternatively, **Pavle STRUGAR**, and **Miodrag JOKIC** knew or had reason to know that JNA forces under their command, direction and/or control, or subordinated to them, were committing the acts described in paragraphs 20, 21 and 22, above, or had done so. **Pavle STRUGAR** and **Miodrag JOKIC** failed to take necessary and reasonable measures to prevent the commission of such acts or punish the perpetrators thereof.

By these acts and omissions, **Pavle STRUGAR** and **Miodrag JOKIC** participated in:

Count 1: Murder, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3 (1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 2: Cruel treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 3: Attacks on civilians, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 51(2) of Additional Protocol I and Article 13(2) of Additional Protocol II to the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 4-6 (MURDER, CRUEL TREATMENT, ATTACKS ON CIVILIANS)

24. The Prosecutor re-alleges and incorporates by reference paragraphs 1-16 in Counts 4-6.

25. **Vladimir KOVACEVIC**, acting individually or in concert with others, planned, ordered, committed, or otherwise aided and abetted in the unlawful shelling of areas throughout the city of Dubrovnik, conducted on 6 December 1991 by JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC** and **Vladimir KOVACEVIC**. Twelve civilians were killed and thirty-four civilians were wounded by the JNA shelling. The names of the deceased and wounded are set out in Schedules I and II, respectively, which are attached to and made part of this amended indictment.

26. Alternatively, **Vladimir KOVACEVIC** knew or had reason to know that JNA forces under his command, direction and/or control, or subordinated to him, were committing the acts described in paragraph 25 above, or had done so. **Vladimir KOVACEVIC** failed to take necessary and reasonable measures to prevent the commission of such acts or punish the perpetrators thereof.

By these acts and omissions, **Vladimir KOVACEVIC** participated in:

Count 4: Murder, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3 (1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 5: Cruel treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 6: Attacks on civilians, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 51(2) of Additional Protocol I and Article 13(2) of Additional Protocol II to the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 7-9 (UNJUSTIFIED DEVASTATION, UNLAWFUL ATTACKS ON CIVILIAN OBJECTS, DESTRUCTION OR WILFUL DAMAGE TO INSTITUTIONS DEDICATED TO RELIGION, CHARITY, AND EDUCATION, THE ARTS AND SCIENCES, HISTORIC MONUMENTS AND WORKS OF ART AND SCIENCE)

27. The Prosecutor re-alleges and incorporates by reference paragraphs 1-16 in Counts 7-9 .

28. From 1 October 1991 through 6 December 1991, **Pavle STRUGAR** and **Miodrag JOKIC**, acting individually or in concert with others, planned, ordered, committed or otherwise aided and abetted in the destruction or wilful damage to dwellings and other buildings in the city of Dubrovnik.

29. The JNA positions on the high ground to the east and north of Dubrovnik provided JNA forces with an unobstructed view of the city and its environs. From these positions and from naval vessels offshore, the JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC**, engaged in unlawful shelling of civilian objects in Dubrovnik.

30. During the course of the attacks on Dubrovnik from 1 October 1991 through 6 December 1991, approximately 1000 shells fired by the JNA forces impacted in the Old Town area of the city. The Old Town of Dubrovnik was a UNESCO World Cultural Heritage Site in its entirety. A number of the buildings in the Old Town and the towers on the city walls were marked with the symbols mandated by the Hague Convention on the Protection of Cultural Property in the Event of Armed Conflict (1954).

31. The unlawful shelling of civilian objects in Dubrovnik occurred during the following attacks, among others:

- The shelling on 23 and 24 October 1991 of the city of Dubrovnik, during which the Old Town area was shelled for the first time.
- The shelling from 8 through 13 November 1991 of the city of Dubrovnik, during which the Old Town, Lapad, and Gruz were shelled. A number of buildings in the Old Town were damaged, as were other civilian structures in other parts of the city.
- The shelling on 6 December 1991 of the city of Dubrovnik, during which the Old Town area was specifically targeted. At least six buildings in the Old Town were destroyed in their entirety: Palace - Od Sigurate 1 (Festival Palace), Palace - Od Sigurate 2, Palace Martinusic – Sv. Josipa 1, Palace - Od Puca 11, Palace - Od Puca 16, Palace Sorkocevic – Miha Pracata 6, and hundreds more suffered damage. In other parts of Dubrovnik, but specifically in the Lapad and Babin Kuk areas, other civilian structures were severely damaged or destroyed.
- During the course of the attacks on Dubrovnik from 1 October 1991 through 6 December 1991, hotels housing refugees, including Libertas Hotel (Boninovo area), Lapad Hotel (Lapad area), Dubrovnik Palace (Lapad area), Minceta Hotel (Babin Kuk area), Petka Hotel (Gruz area), Vis Hotel (Babin Kuk area), Plakir Hotel (Babin Kuk area), Bellevue Hotel (Boninovo area), Argosy Hotel (Babin Kuk area), Tirena Hotel (Babin Kuk area), Argentina Hotel (Ploce area), Adriatic Hotel (Lapad area) and Splendid Hotel (Lapad area), were severely damaged or destroyed.

32. The destruction or wilful damage, which occurred in October, November, and December 1991, included destruction or damage to the structures and objects referred to in Article 3 (d) of the Statute of the Tribunal. These structures and objects include, but are not limited to, those listed in Schedule IV, which is attached to and made part of this amended indictment.

33 . Alternatively, **Pavle STRUGAR** and **Miodrag JOKIC** knew or had reason to know that JNA forces under their command, direction and/or control, or subordinated to them, were committing the acts described in paragraphs 29, 30 and 31, above, or had done so. **Pavle STRUGAR** and **Miodrag JOKIC** failed to take necessary and reasonable measures to prevent the commission of such acts or punish the perpetrators thereof.

By these acts and omissions, **Pavle STRUGAR** and **Miodrag JOKIC**, participated in:

Count 7 : Devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(b) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 8 : Unlawful attacks on civilian objects, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 52 of Additional Protocol I to the Geneva Conventions of 1949, and customary law, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 9 : Destruction or wilful damage done to institutions dedicated to religion, charity, and education, the arts and sciences, historic monuments and works of art and science, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 10-12
(UNJUSTIFIED DEVASTATION, UNLAWFUL ATTACKS ON CIVILIAN OBJECTS, DESTRUCTION OR WILFUL DAMAGE TO INSTITUTIONS DEDICATED TO RELIGION, CHARITY, AND EDUCATION, THE ARTS AND SCIENCES, HISTORIC MONUMENTS AND WORKS OF ART AND SCIENCE)

34. The Prosecutor re-alleges and incorporates by reference paragraphs 1-16 in Counts 10-12.

35. **Vladimir KOVACEVIC**, acting individually or in concert with others, planned, ordered, committed, or otherwise aided and abetted in the destruction or wilful damage to dwellings and other buildings in the city of Dubrovnik, which occurred on 6 December 1991.

36. JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC** and **Vladimir KOVACEVIC** engaged in unlawful shelling of civilian objects in Dubrovnik, during which the Old Town area was specifically targeted. At least six buildings in the Old Town were destroyed in their entirety: Palace - Od Sigurate 1 (Festival Palace), Palace - Od Sigurate 2, Palace Martinusic – Sv. Josipa 1, Palace - Od Puca 11, Palace - Od Puca 16, Palace Sorkocecic – Miha Pracata 6, and hundreds more suffered damage. Other civilian structures were severely damaged or destroyed in other parts of Dubrovnik, but specifically in the Lapad and Babin Kuk areas. The destruction or wilful damage, which occurred on 6 December 1991, included destruction or damage to the structures and objects referred to in Article 3 (d) of the Statute of the Tribunal. These structures and objects are listed in Schedule IV, which is attached to and made part of this amended indictment.

37. Alternatively, **Vladimir KOVACEVIC** knew or had reason to know that JNA forces under his command, direction and/or control, or subordinated to him, were committing the acts described in paragraph 36, above, or had done so. **Vladimir KOVACEVIC** failed to take necessary and reasonable measures to prevent the commission of such acts or punish the perpetrators thereof.

By these acts and omissions, **Vladimir KOVACEVIC** participated in:

Count 10 : Devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(b) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 11 : Unlawful attacks on civilian objects, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 52 of Additional Protocol I to the Geneva Conventions of 1949, and customary law, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 12 : Destruction or wilful damage done to institutions dedicated to religion, charity, and education, the arts and sciences, historic monuments and works of art and science, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 13-15

(WANTON DESTRUCTION OF VILLAGES, DESTRUCTION OR WILFUL DAMAGE DONE TO INSTITUTIONS DEDICATED TO EDUCATION AND RELIGION, PLUNDER OF PUBLIC OR PRIVATE PROPERTY)

38. The Prosecutor re-alleges and incorporates by reference paragraphs 1-16 in Counts 13-15.

39. In October 1991, JNA forces under the command of **Pavle STRUGAR**, including forces under the command of **Miodrag JOKIC**, seized and occupied Croatian territory in the proximity of the city of Dubrovnik. This part of the Dubrovnik region included, in whole or in part, the areas of Konavle, Zupa Dubrovacka, and Primorje.

40. After JNA forces occupied the above-mentioned areas surrounding Dubrovnik, troops under the command of **Pavle STRUGAR**, including troops under the command of **Miodrag JOKIC**, plundered public, commercial and private property in the areas under their control. Villages where plunder occurred include, but are not limited to, Dubravka and Slano. Plunder began right after the occupation of the two above-mentioned villages, on or about 2 October 1991 and on or about 4 October 1991, respectively. Much of this property was transported to the Republic of Montenegro in JNA military vehicles and the army thereafter instituted measures to track and retain the looted property.

41. JNA troops under the command of **Pavle STRUGAR**, including troops under the command of **Miodrag JOKIC**, also destroyed public, commercial, and religious buildings as well as private dwellings in the areas around Dubrovnik. Villages that were extensively damaged or were totally destroyed include, but are not limited to:

- Brgat – occupied by the JNA on or about 24 October 1991, in which, *inter alia*, religious buildings were damaged
- Cilipi – occupied by the JNA on or about 6 October 1991
- Dubravka – occupied by the JNA on or about 2 October 1991
- Gruda – occupied by the JNA on or about 4 October 1991, in which, *inter alia*, religious buildings were damaged
- Mocici – occupied by the JNA on or about 6 October 1991
- Osojnik – occupied by the JNA on or about 12 October 1991, in which, *inter alia*, religious buildings were damaged

- Slano – occupied by the JNA on or about 4 October 1991
- Zvekovica – occupied by the JNA on or about 7 October 1991

42. Alternatively, **Pavle STRUGAR** and **Miodrag JOKIC** knew or had reason to know that JNA forces under their command, direction and/or control, or subordinated to them, were committing the acts described in paragraphs 40 and 41 above, or had done so. **Pavle STRUGAR**, and **Miodrag JOKIC** failed to take necessary and reasonable measures to prevent the commission of such acts or punish the perpetrators thereof.

By these acts and omissions, **Pavle STRUGAR** and **Miodrag JOKIC** participated in:

Count 13 : Wanton destruction of villages, or devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(b) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 14 : Destruction or wilful damage done to institutions dedicated to education or religion, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 15 : Plunder of public or private property, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(e) and 7(1) and 7(3) of the Statute of the Tribunal.

ADDITIONAL FACTS

43. The city of Dubrovnik is located in the far southeastern extremity of Croatia on the coast of the Adriatic Sea. The Dubrovnik municipality, as it existed in 1991, consisted of a narrow strip of land ranging from 500 metres to 15 kilometres in width and approximately 200 kilometres in length. The municipality was bordered by the Socialist Republic of Bosnia and Herzegovina to the north and east and by the Republic of Montenegro to the southeast.

44. In the 1991 census, the population of Dubrovnik municipality was 71,419 of which 58,836 (82.4%) were Croats; 4,765 (6.7%) were Serbs; 2,886 (4.0%) were Muslims; 689 (.9%) were Montenegrins; 1,189 (1.7%) were Yugoslavs; and 3,054 (4.3%) were others or undeclared.

45. Dubrovnik, established in antiquity, contains a significant number of historic monuments, works of art or places of worship which constitute the cultural and spiritual heritage of peoples. Dubrovnik and the immediately adjoining coastal regions, Primorje to the northwest of the city and Konavle to the southeast, contain historic towns and villages which are important to the Croatian economy and its tourist sector.

46. An analysis conducted by the Institute for the Protection of Cultural Monuments, in conjunction with UNESCO, found that of the 824 buildings in the Old Town, 563 (or 68.33 per cent) had been hit by projectiles in 1991 and 1992. 438 roofs had been damaged by direct hits and 262 by fragments of projectiles. 314 direct hits were recorded on building facades and on the paving of streets and squares. Six buildings were completely destroyed by fire.

47. In 1993, the Institute for the Rehabilitation of Dubrovnik, in conjunction with UNESCO, undertook a study to determine the costs of reconstructing and repairing the buildings in the Old Town which were destroyed or damaged as a result of JNA shelling in 1991 and 1992. The total cost for restoring public and private buildings, religious buildings, streets, squares, fountains, ramparts, gates, and bridges was estimated at 9,657,578 US dollars.

Dated this 31st day of March 2003
At The Hague
The Netherlands

Carla del Ponte
Prosecutor

**CIVILIAN SHELLING DEATHS IN AND AROUND DUBROVNIK
1 OCTOBER – 6 DECEMBER 1991**

| DATE | LOCATION | VICTIMS | YEAR OF BIRTH / SEX |
|-------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 October | Osojnik | Mato VIOLIC | 1945 / Male |
| 1 October | Kupari | Jeje FERLAN | 1949 / Female |
| 5 October | Dubrovnik | Rada HASIC | 1953 / Female |
| 6 October | Dubrovnik | Milan MILISIC | 1941 / Male |
| 6 October | Komolac | Andrija CRNCEVIC | 1960 / Male |
| | | Stijepo CIKATO | 1949 / Male |
| 7 October | Mokosica | Jozo BRAJOVIC Denis CIMIC Vladimirka DOPSAJ Milenko KULAS Miho LIBAN Nikola LIBAN Ivo MASKARIC Alen VASILJEVIC Josko VUKOVIC | 1950 / Male 1973 / Male 1973 / Female 1971 / Male 1972 / Male 1973 / Male 1955 / Male 1971 / Male 1971 / Male |
| 22 October | Dubrovnik | Grgo VULETIC | 1954 / Male |
| 4 November | Dubrovnik | Andro DJURAS | 1941 / Male |
| 9 November | Dubrovnik (Babin Kuk) | Luce SPREMIC | 1911 / Female |
| 10 November | Dubrovnik | Duro BOKUN Ivo BOKUN Marija BURUM Nikica CUPIC Antun LANG Ivo MARTINOVIC Anica, PANDZA Ivan RADIC Dubravko SEVELJ Jovo VASILJEVIC | 1980 / Male 1951 / Male 1977 / Female 1947 / Male 1924 / Male 1915 / Male 1924 / Female 1944 / Male 1962 / Male 1937 / Male |
| 20 November | Mokosica | Vito ZITKOVIC | 1921 / Male |
| 24 November | Dubrovnik | Nikola KRIJES | 1921 / Male |
| 6 December | Dubrovnik | Koviljka KOSJERINA | 1942 / Female |
| | | Drago OBRADOVIC | 1960 / Male |
| 6 December | Dubrovnik (Gruz) | Duro KOLAR | 1918 / Male |
| 6 December | Dubrovnik (Libertas) | Frano MARTINOVIC Niko MIHOCEVIC Teo PASKOJEVIC Stjepan SALMANIC Andro SAVINOVIC | 1965 / Male 1950 / Male 1969 / Male 1957 / Male 1947 / Male |
| 6 December | Dubrovnik (Old Town) | Tonci SKOCKO Pavo URBAN | 1973 / Male 1968 / Male |
| 6 December | Dubrovnik (Lero) | Luka CRNCEVIC Ilija RADIC | 1931 / Male 1953 / Male |

SCHEDULE II

**CIVILIANS WOUNDED IN AND AROUND DUBROVNIK
1 OCTOBER – 6 DECEMBER 1991**

| DATE | LOCATION | WOUNDED |
|------------------------|-----------------|-----------------------|
| 1,2, 3 October | Rozat | HERCEG, Desa |
| | Osojnik | DOVIC, Kate |
| | Komolac | TUNOVIC, Esma |
| | Komolac | TUNOVIC, Zaim |
| | Plat | GURIS, Ivan |
| | Komolac | VULETIC, Miljenko |
| | Komolac | ZUTAC, Marinko |
| | Kupari | NIKOLIC, Alksandar |
| | Mokosica | DUBELJ, Ivo |
| | | |
| 3 October | | BOGUT, Tihomir |
| | | |
| 3, 4 October | | VERSIC, Slavko |
| | Cavtat | DROBAC, Pavo |
| | Dubrovnik | TONIC, Nola |
| | | |
| 5 October | | STOJANOVIC, Branislav |
| | | |
| 5, 6 October | | MILJANIC, Stijepo |
| | Ljuta | MONKOVIC, Paulina |
| | Dubrovnik | IVUSIC, Ljiljana |
| | Dubrovnik | BOZANJA, Pero |
| | Dubrovnik | BONACIC, Miso |
| | Mlini | FABIJAN, Tonko |
| | Dubrovnik | CUSTOVIC, Izet |
| | Oracac | KRISTOVIC, Miho |
| | Zvekovica | CVIJETIC, Vlado |
| | Cibaca | SAVINOVIC, Lovro |
| | | |
| 6 October | | PROKURICA, Ivo |
| | | |
| 6, 7, 8 October | Dubrovnik | BJELOPERA, Mladenka |
| | Buici | LETUNIC, Ivo |
| | Mlini | PROHASKA, Albert |
| | Dubrovnik | CECOZZA, Vitto |
| | Dubrovnik | KRISTOVIC, Miho |
| | | |
| 12 October | | OREB, Mark |
| | | |
| 18, 19, 20, 21 October | Dubrovnik | VUKAS, Ante |
| | Dubrovnik | ZITKOVIC, Marko |
| | Dubrovnik | KLJUNAK, Davor |
| | Dubrovnik | SOLDO, Katica |
| | Dubrovnik | SOLDO, Daniel |
| | Dubrovnik | SARECEVIC, Mile |
| | Dubrovnik | KLESKOVIC, Snjezana |
| | | |
| 23, 24, 25, 26 October | Dubrovnik | PERAK, Marin |
| | Dubrovnik | DULCIC, Vjera |

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| | Dubrovnik | KLEPO, Hidajeta |
| | Dubrovnik | MISIC, Bosko |
| | Dubrovnik | SKALJIC, Muharem |
| | Zaton | PULJIZEVIC, Katica |
| | | |
| 26 October To 1 November | | ZDILAR, Damir |
| | Dubrovnik | SALTARIC, Srdjan |
| | Dubrovnik | SALTARIC, Ivana |
| | Dubrovnik | ANDELIC, Stjepan |
| | Dubrovnik | IBRAHIMOVIC, Mehmedalija |
| | | MATUSKO, Anka |
| | | |
| 1, 2 November | Dubrovnik | CEBULC, Marija |
| | Mokosica | GUNJINA, Antun |
| | | |
| 2, 3, 4 November | Dubrovnik | DJEKOVIC, Marija |
| | Dubrovnik | KOBILIC, Mato |
| | Dubrovnik | CAR, Bozo |
| | Dubrovnik | JUROS, Nana |
| | | |
| 4, 5 November | Dubrovnik | MARUSIC, Nikola |
| | Dubrovnik | LJUBIC, Ivo |
| | Dubrovnik | SUKNO, Marina |
| | | |
| 5, 6, 7 November | Dubrovnik | DURIC, Marija |
| | Dubrovnik | DANICIC, Stijepo |
| | Dubrovnik | GLAVINIC, Josip |
| | Dubrovnik | MILJAS, Jozo |
| | | |
| 7, 8, 9 November | Dubrovnik | VUKIC, Niko |
| | Dubrovnik | PAVLINA, Nikola |
| | Dubrovnik | KNEGO, Vlaho |
| | | |
| 9 November | Dubrovnik | STRUJIC, Jako |
| | Dubrovnik | MEHAKOVIC, Ramo |
| | Dubrovnik | CUPIC, Miho |
| | Dubrovnik | PETKOVIC, Milivoj |
| | Dubrovnik | LUCIC, Duro |
| | Dubrovnik | RASICA, Mato |
| | Dubrovnik | VRTIPRAH, Pero |
| | Dubrovnik | LUCIC, Marin |
| | | |
| 10 November | Dubrovnik | KISIC, Duro |
| | Dubrovnik | MRDALO, Ane |
| | Dubrovnik | LABAS, Ane |
| | Dubrovnik | BURUM, Vjeko |
| | Dubrovnik | BURUM, Jelena |
| | Dubrovnik | BURUM, Jela |
| | Dubrovnik | PANDA, Ana-Marija |
| | Dubrovnik | NOKOVIC, Milenko |

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| | Dubrovnik | MILOSLAVIC, Mise |
| | Dubrovnik | VOJVODIC, Petar |
| | Dubrovnik | BOKUN, Ivan |
| | Dubrovnik | BOKUN, Ane |
| | Dubrovnik | MANDZIN, Luka |
| | Dubrovnik | MARTIC, Vlaho |
| | Dubrovnik | PORTOLAN, Antun |
| | Dubrovnik | SKANSI, Kate |
| | Dubrovnik | SUDA, Tonka |
| | Dubrovnik | RASICA, Mato |
| | Dubrovnik | BRAUTOVIC, Antun |
| | Dubrovnik | VRTIPRAH, Pero |
| | | |
| 11 November | Dubrovnik | DANOVIC, Mirsad |
| | Dubrovnik | GANGAI, Ane |
| | Dubrovnik | SUSILOVIC, Pavo |
| | Dubrovnik | PRKUT, Mato |
| | Dubrovnik | DAVISON, John Philip |
| | Dubrovnik | MARTINOVIC, Pero |
| | Dubrovnik | ANDUSIC, Irena |
| | Dubrovnik | LJUBISIC, Ivica |
| | Dubrovnik | PUTILI, Nada |
| | Dubrovnik | KNEGO, Mato |
| | Dubrovnik | KLAIC, Luce |
| | Dubrovnik | AVDIC, Ivo |
| | Dubrovnik | SAMBRAILO, Ane |
| | Dubrovnik | SAMBRAILO, Ljubo |
| | Dubrovnik | SAMBRAILO, Pero |
| | Dubrovnik | LJUBENKO, Vlaho |
| | Dubrovnik | SAMBRAILO, Ane |
| | Dubrovnik | KISE, Cvijeto |
| | Dubrovnik | CATOVIC, Huso |
| | Dubrovnik | BJELOS, Pero |
| | Dubrovnik | MILIC, Duro |
| | Dubrovnik | SASILO, Marija |
| | Dubrovnik | CRNCIC, Ema |
| | Dubrovnik | KUKULJICA, Rade |
| | Dubrovnik | VLAHOVIC, Ivan |
| | | |
| 12 November | Dubrovnik | PERAK, Nino |
| | Dubrovnik | PITAREVIC, Vicko |
| | Dubrovnik | MARUSIC, Marija |
| | Dubrovnik | JERINIC, Mato |
| | Dubrovnik | BOGDANOVIC, Ivan |
| | Dubrovnik | DUKA, Bozo |
| | Dubrovnik | VUCICEVIC, Dejan |
| | Dubrovnik | PERIC, Pero |
| | Dubrovnik | CABRILO, Staka |
| | Dubrovnik | BRAJEVIC, Sinisa |
| | Dubrovnik | MILJEVIC, Nedo |
| | Dubrovnik | JOVANOVIC, Aleksandar |

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| | Dubrovnik | JOVANOVIC, Marija |
| | Dubrovnik | JURKOVIC, Mato |
| | Dubrovnik | COROVIC, Gesa |
| | Dubrovnik | PAVLOVIC, Jozefina |
| | | |
| 13 November | Dubrovnik | BOSNJAK, Zvonko |
| | Dubrovnik | MISKOVIC, Emilija |
| | Dubrovnik | PAVLOVIC, Bernardica |
| | Dubrovnik | VIOLIC, Jagoda |
| | Dubrovnik | CIZMO, Husein |
| | Dubrovnik | JERKOVIC, Vice |
| | Dubrovnik | SMOK, Paula |
| | | |
| 17 November | Dubrovnik | COKLJAT, Dragan |
| | Dubrovnik | RAKIDIJA, Miho |
| | | |
| 18 November | Dubrovnik | GONCIN, Vidosava |
| | Dubrovnik | RADOVIC, Miho |
| | | |
| 21 November | Slano | SIBILJAN, Ivo |
| | Dubrovnik | ROZNER, Ivo |
| | | |
| 2 December | Dubrovnik | SARIC, Ibro |
| | | |
| 5 December | Dubrovnik | GANGAI, Vidosava |
| | Dubrovnik | RADOVIC, Miho |
| | | |
| 6 December | Dubrovnik | CVETINOVIC, Nikola |
| | Dubrovnik | HUSEJNOVIC, Camil |
| | Dubrovnik | VALJALO, Mato |
| | Dubrovnik | OBRADOVIC, Drago |
| | Dubrovnik | CRNCEVIC, Luka |
| | Dubrovnik | DRAGIC, Niko |
| | Dubrovnik | STJEPOVIC, Duro |
| | Dubrovnik | VUKIC, Spasoje |
| | Dubrovnik | POPOVIC, Zdravko |
| | Dubrovnik | ANTUNOVIC, Cvijeto |
| | Dubrovnik | BRADARIC, Adolfo |
| | Dubrovnik | COROVIC, Savo |
| | Dubrovnik | NOZICA, Ljubica |
| | Dubrovnik | PROKURICA, Zeljko |
| | Dubrovnik | PROKURICA, Pero |
| | Dubrovnik | NOVAKOVIC, Veronika |
| | Dubrovnik | NOVAKOVIC, Aleksandar |
| | Dubrovnik | DEVIC, Ivica |
| | Dubrovnik | KOPRIVICA, Igor |
| | Dubrovnik | ZVONE, Ante |
| | Dubrovnik | GRLJEVIC, Antonio |
| | Dubrovnik | BRADARIC, Adolfo |
| | Dubrovnik | STANDINGER, Zeljko |
| | Dubrovnik | JERKOVIC, Nedjeljka |

SCHEDULE III**OVERALL MILITARY STRUCTURE**

The accused **Pavle STRUGAR**, as Commander of the JNA Second Operational Group, commanded and/or had otherwise subordinated to his operational control, throughout or during various periods of the amended indictment, a number of JNA land and naval units, Territorial Defence units from the Republic of Montenegro and the Socialist Republic of Bosnia and Herzegovina, paramilitary units, police and special police units that were subordinated to the JNA. These included, but were not limited to the following in their entirety or elements thereof:

1. 37.Corps (Uzice)
2. 2.Corps (Podgorica/Titograd)
3. 9.VPS (9 Naval Sector)
4. 472.mtbr (Motorised Brigade, Trebinje)
5. 2.Tactical Group

The accused **Miodrag JOKIC**, as Commander of the JNA 9 VPS commanded and/or had otherwise subordinated to his operational control, throughout or during various periods of the amended indictment, a number of JNA land and naval units, Territorial Defence units from the Republic of Montenegro and the Socialist Republic of Bosnia and Herzegovina, paramilitary units, police and special police units that were subordinated to the JNA. These included, but were not limited to the following in their entirety or elements thereof:

1. 472.mtbr (Motorised Brigade, Trebinje)
2. 5.pmtbr (Partisan Motorised Brigade, Podgorica/Titograd)
3. 19.GMO (Border Patrol Detachment, Boka)
4. 107.OAG (coastal artillery group) of 9.VPS
5. POAD (mobile coastal artillery) of 9.VPS
6. Territorial Defence Units from Herceg Novi, Kotor, Tivat, Budva, Bar, Mojkovac, Bijelo Polje and Trebinje.

The accused **Vladimir KOVACEVIC**, at the time(s) relevant to the charges against him in the amended indictment, commanded the 3rd Battalion of 472.mtbr.