

D. ŠEŠELJ's crimes in Hrtkovci

1. Introduction

484. Hrtkovci is a village in the Ruma municipality of Vojvodina, which is the province of Serbia that borders the Croatian regions of Eastern Slavonia, Baranja and Western Srem. In 1990, Hrtkovci was comprised of a relative majority of Croats with significant Hungarian and Serb minorities.¹⁴⁹⁶ Relations between local Serbs and Croats in Hrtkovci were generally peaceful.¹⁴⁹⁷

485. At a rally in Hrtkovci on 6 May 1992 – held during the Serb celebration of St. George's day¹⁴⁹⁸ – against a backdrop of increasing ethnic tension in the village, ŠEŠELJ gave a discriminatory speech to a large audience which included local Croats, local Serbs and armed SRS/SČP volunteers. Other Croat inhabitants of Hrtkovci soon heard about ŠEŠELJ's speech by word of mouth and through the press.

486. ŠEŠELJ's public "hate speech" on 6 May 1992 directly caused a number of Croats to leave Hrtkovci. His speech also triggered and facilitated a massive campaign of intimidation, harassment and violence directed against the local Croat population, causing further displacements of Croats from Hrtkovci and surrounding areas. ŠEŠELJ physically committed persecution, deportation and forcible transfer in Hrtkovci.¹⁴⁹⁹

2. Build-up

487. ŠEŠELJ and other Serbian nationalists had frequently challenged the status of Vojvodina as an Autonomous Province within the SFRY.¹⁵⁰⁰ One of the key tenets of the Greater Serbia ethos was that the entire nation of Serbs, including Serbia and the two Autonomous Provinces, should be brought together within a single entity.¹⁵⁰¹ Having a Serbian majority population, Vojvodina was considered to be Serbian land,

¹⁴⁹⁶ Exh.P00565, p.13 (public); [REDACTED]; Paulić, T.11895-11896 (open); Ejić, T.10320-10321 (open); Baričević, T.10598 (open).

¹⁴⁹⁷ [REDACTED]; Baričević, T.10598-10599, 10756 (open); Ejić, T.10321 (open); Paulić, T.11895-11896 (open); [REDACTED].

¹⁴⁹⁸ Exh.P00547, p.1 (public).

¹⁴⁹⁹ See Annexes A and D.6 for proofs and victims for each of these counts.

¹⁵⁰⁰ E.g. Tomić, T.2945, 3240 (open); Exh.P00164, pp.70-71(public).

¹⁵⁰¹ E.g. Exh.P01177, pp.1-2 (public).

and from the mid to late 1980s, the Republic of Serbia undertook steps to deprive Vojvodina of a separate identity and to incorporate it into Serbia.¹⁵⁰² By 1990, this goal had been achieved in substance, thereby ending what Serbs regarded as a discriminatory feature of the SFRY – that the Serb nation was denied a single, united identity.¹⁵⁰³

488. The events in Hrtkovci thus fall within the push for Vojvodina's Serb homogeneity. As a village with historical ties to the World War II Croatian "Ustasha" State¹⁵⁰⁴ and its relative majority Croat population in 1990, Hrtkovci was an attractive target for a discriminatory ethnic campaign.¹⁵⁰⁵

489. In 1991, Serb refugees began arriving in Hrtkovci as they fled from the ethnic conflict in Croatia.¹⁵⁰⁶ The local commune of Hrtkovci organised temporary housing, food and financial assistance for the refugees.¹⁵⁰⁷ A second wave of refugees arrived in early 1992, and the commune again responded to the situation and provided temporary accommodation.¹⁵⁰⁸

490. However, by spring 1992, it was becoming increasingly difficult to house the incoming Serb refugees and ethnic tensions began to rise in Hrtkovci. Ostoja SIBINČIĆ, a local Serb official who was widely considered to be an associate of ŠEŠELJ,¹⁵⁰⁹ provided the refugees with the addresses of local Croats who were abroad and whose houses in Hrtkovci were vacant.¹⁵¹⁰ A Serb refugee named Rade ČAKMAK assisted SIBINČIĆ with these illegal allocations. Serb refugees soon began breaking into and occupying the vacant houses.¹⁵¹¹

491. The build-up of ethnic tension in Hrtkovci took place against a backdrop of increasing discrimination - as promoted by ŠEŠELJ - directed at Croats elsewhere in and outside Serbia. On 1 April 1992, ŠEŠELJ used a televised session of the Serbian

¹⁵⁰² AFI-27.

¹⁵⁰³ AFI-27.

¹⁵⁰⁴ E.g. [REDACTED]; Exh.P00547, p.1 (public); Exh.P00550 p.2 (public); Exh.P00557 (public).

¹⁵⁰⁵ Exh.P00164, pp.88-89 (public); [REDACTED].

¹⁵⁰⁶ Baričević, T.10600 (open); Paulić, T.11896 (open); [REDACTED]; Ejić, T.10321-10323 (open).

¹⁵⁰⁷ Baričević, T.10600, T.10675 (open); Ejić, T.10328-10329 (open).

¹⁵⁰⁸ Baričević, T.10678-10679 (open).

¹⁵⁰⁹ Baričević, T.10602, 10621, 10623, 10674-10678 (open); Ejić, T.10540 (open); VS-067, T.15421, 15425 (open); Paulić, T.11918, 11934 (open); [REDACTED]; Baričević, T.10713 (open), [REDACTED].

¹⁵¹⁰ [REDACTED].

¹⁵¹¹ Ejić, T.10328 (open); Paulić, T.11897-11898 (open); Baričević, T.10604 (open); [REDACTED].

National Assembly to denigrate Croats in Serbia, to accuse the Croat population of conspiring with TUĐMAN as Ustašas, and to call for the expulsion of Croats from Serbia.¹⁵¹² ŠEŠELJ explicitly threatened Croats in Vojvodina by declaring that “Croats in Slankamen, Zemun [towns or villages in Vojvodina] and other places will not be able to sleep a wink until they have moved out”.¹⁵¹³ ŠEŠELJ pronounced:

We will pack you [Croats in Serbia] up on trucks and trains, so you can try to manage in Zagreb. You will even get the addresses of deserted Serbian homes, houses, apartments, and you can move in there, the furniture and everything is still there.¹⁵¹⁴

492. Many deputies supported ŠEŠELJ’s persecutory statement. To Antun SKENDEROVIĆ, a Deputy of Croat descent, however, it was clear that ŠEŠELJ was calling for the forcible expulsion of Croats in Serbia:

My reply concerns Mr. ŠEŠELJ’s participation in the debate, when he said that the Croats should move outside the borders of this state. (Voices: They should). Thank you kindly, at least we know now where we stand.

I think that Mr. ŠEŠELJ has double standards. What gives one the right to advocate, exert and approve armed pressure and attacks on the Croatian people in the Republic of Serbia, to start moving out? If this is the demand, coming from the speaker’s stand, then it is only being confirmed and approved in a way. Those citizens, who respect the laws of this state and who did not violate the laws of this state are entitled to live here, because they have always lived here, in their own home. On the one hand, Mr. ŠEŠELJ advocates that everyone should have the right to live and move wherever they want, but on the other, he denies the same right to the Croats. We are aware of this and that he thinks in this way, and behaves in this way, and implements such practices. However, it is good that he has said it at the speaker’s stand, so even the public could know. Thank you very much.¹⁵¹⁵

493. On 4 April 1992, ŠEŠELJ gave another speech to several thousand people at an SRS rally in Apatin, a town in Vojvodina. ŠEŠELJ told the attendees that TUĐMAN had expelled several thousand Serbs from Croatia, and therefore Serbs had

¹⁵¹² Exh.P00075, pp.1-7 (public); Exh.P00892, p.4 (public); Exh.P00893, pp.21-23 (public). E.g. Exh.P00016, p.1 (public).

¹⁵¹³ Exh.P00075, p.7 (public); Exh.P00893, p.21 (public).

¹⁵¹⁴ Exh.P00893, p.23 (public).

¹⁵¹⁵ Exh.P00892, p.4 (public).

to “drive all the Croats out of Serbia”.¹⁵¹⁶ According to him: “Croats have no business in Serbia. Anyone calling for human rights and civil liberties, can look for them in Zagreb [...] we will simply see them onto the buses and see them to the border”.¹⁵¹⁷

494. On 7 April 1992, in a televised broadcast of the National Assembly, **ŠEŠELJ** again demanded that Croats be expelled from Serbia.¹⁵¹⁸ The Chairman of the Assembly read the transcript of **ŠEŠELJ**’s statements from 1 April 1992 and declared them to be discriminatory and contrary to Serbia’s Constitution.¹⁵¹⁹

3. The Hrtkovci rally of 6 May 1992

495. On 6 May 1992, **ŠEŠELJ** was scheduled to speak at a political rally in Hrtkovci. The SRS played ethnically-divisive Chetnik music from a loudspeaker throughout the day.¹⁵²⁰ Two hours before the rally, a busload of men, armed with automatic rifles and dressed in black clothing like World War II era Chetnik forces,¹⁵²¹ were deployed at the site of the rally and around the village.¹⁵²² **SIBINČIĆ** was one of the organisers of the rally and remained by the stage during the speeches,¹⁵²³ reinforcing his political and ideological ties to **ŠEŠELJ**.

496. **ŠEŠELJ** told the crowd, in part:

In this village, too, in Hrtkovci, in this place in Serbian Srem, there is no room for Croats. Who are the only Croats for whom there is room among us? Only those Croats and their families who have shed blood together with us on the frontlines. They were called Croats in name only, anyway. Some of them served with our Volunteers. They have already awakened to the fact that they are, in fact, Catholic Serbs. They will stay here with us, while all the rest must clear out of Serbia. Including those from here, from Hrtkovci, who locked up their houses and left, reckoning, I suppose, that they would come back one day, but our message to them is: no, you have nowhere to return to. Serbian refugees will move into their houses.

Serbian brothers and sisters, now that **TUĐMAN** has expelled more than two hundred thousand Serbs, a part of them will return to the

¹⁵¹⁶ Exh.P01298, p.1 (public).

¹⁵¹⁷ Exh.P01298, p.1 (public).

¹⁵¹⁸ Exh.P00075, p.9 (public).

¹⁵¹⁹ Exh.P00075, pp.9-10 (public).

¹⁵²⁰ Baričević, T.10607, 10609-10610 (open).

¹⁵²¹ Ejčić, T.10335 (open); Baričević, T.10610, 10695-10699, 10758-10759 (open); Paulić, T.11904 (open).

¹⁵²² Ejčić, T.10335 (open); Baričević, T.10610 (open).

¹⁵²³ Ejčić, T.10343 (open).

area of Serbian Krajina, but another part cannot settle there. We have to give those Serbs a roof over their heads and feed the hungry mouths. We have no money to build new housing. We do not have the capacity to create new jobs for them. Very well, then, if we cannot do that, then we should give every Serbian family of refugees the address of one Croatian family. The police will give it to them, the police will do as the government decides, and we will be the government soon. Fine, then. Every Serbian family of refugees will come to a Croatian door and give the Croats they find there their address in Zagreb or other Croatian town. Oh, they will, they will. There will be enough buses, we will drive them to the border of Serbian territory and they can walk on from there, if they do not leave before of their own accord. ...

I firmly believe that you, Serbs from Hrtkovci and other villages around here, will also know how to preserve your harmony and unity, that you will promptly get rid of the remaining Croats in your village and the surrounding villages.¹⁵²⁴

497. In front of an audience of at least 1,000 people, including local Croats,¹⁵²⁵ local Serbs, men dressed in camouflage and Chetnik garb, and Serb refugees who had travelled from parts of Vojvodina and Eastern Slavonia,¹⁵²⁶ **ŠEŠELJ** gave a speech in which he called for a “Greater Serbia” stretching from Virovitica to Karlobag.¹⁵²⁷

498. **ŠEŠELJ**’s calls for Croats to be forcefully removed from Hrtkovci echoed past calls for enforced population displacements and “exchanges” in Vojvodina. Between 1937 and 1939, the Serbian Cultural Club – the programme of which anticipated that of the Chetnik programme of World War II¹⁵²⁸ – called for Croats to be expelled from Vojvodina with a view to creating a more homogeneous state entity.¹⁵²⁹ During the early 1940s, the Chetnik movement similarly advocated the expulsion of Croats from Vojvodina as part of its vision of a “Homogenous Serbia”.¹⁵³⁰ **ŠEŠELJ**’s 6 May 1992 speech was a deliberate cue to evoke memories of these past campaigns and thereby trigger intense fear in the local Croat population. This provocative battle cry for “Greater Serbia” was reinforced by the dress and appearance of the armed SRS/SCP volunteers who mingled with the crowd

¹⁵²⁴ Exh.P00547, pp.4, 8 (public).

¹⁵²⁵ Paulić, T.11903-11904 (open); Baričević, T.10613-10614 (open).

¹⁵²⁶ Ejčić, T.10496 (open).

¹⁵²⁷ Baričević, T.10619-10620 (open); Exh.P00547, pp. 2-3 (public).

¹⁵²⁸ Exh.P00164, pp.26-27, 33, 42 (public).

¹⁵²⁹ Exh.P00164, pp.32-33, 45 (public).

¹⁵³⁰ Exh.P00164, p.45 (public).

throughout ŠEŠELJ's speech. Croats in the audience found these men "frightening".¹⁵³¹

499. ŠEŠELJ insulted and humiliated the Croat inhabitants of Hrtkovci by describing Croats as "disloyal" and asserting that they were enemies of the Serbian people.¹⁵³² ŠEŠELJ advocated discrimination and violence against the local Croat population, in particular by declaring that mixed marriages between Croats and Serbs must be divorced.¹⁵³³

500. ŠEŠELJ explicitly called for the forceful expulsion of Croats from Hrtkovci.¹⁵³⁴ He announced that in three days Croats would be given homes in Croatia, and that if they did not move to those homes they would be placed on buses and sent to the border.¹⁵³⁵ ŠEŠELJ stated that Serb refugees would then move into the Croats' houses in Hrtkovci so that the Croats would "have nowhere to return to".¹⁵³⁶ He pounded his chest several times¹⁵³⁷ and shouted phrases such as "let them go to their homeland", which prompted applause and shouts of "Ustasha out" and "this is Serbia".¹⁵³⁸

501. ŠEŠELJ stated that his party knew the names of those from Hrtkovci who were members of the Croatian National Guard (ZNG), and that their parents were disloyal Croats for whom there was no place in Hrtkovci.¹⁵³⁹ Several witnesses testified that ŠEŠELJ also read out a specific list of names of prominent Croats who he said were "disloyal" and should leave Hrtkovci.¹⁵⁴⁰

502. After learning of the Tribunal's indictment against him and before surrendering, ŠEŠELJ admitted to having read out a list of names at the 6 May 1992 rally. In a speech publicized on Braca Karic TV, ŠEŠELJ stated:

¹⁵³¹ Paulić, T.11904 (open).

¹⁵³² Ejčić, T.10341-10342, 10358-10359 (open).

¹⁵³³ Baričević, T.10624 (open); VS-1134, T.10775 (open); Paulić, T.11931 (open) (Paulić heard that mixed marriages must be broken).

¹⁵³⁴ Ejčić, T. 10342 (open); Paulić, T.11905-11907 (open); VS-067, T.15405 (open).

¹⁵³⁵ Baričević, T.10621 (open); Paulić, T.11906-11907 (open).

¹⁵³⁶ Exh.P00547, p.4 (public).

¹⁵³⁷ Paulić, T.10906-10907(open).

¹⁵³⁸ Ejčić, T.10343 (open), [REDACTED]; Baričević, T.10621 (open).

¹⁵³⁹ Ejčić, T.10341-10342 (open).

¹⁵⁴⁰ Baričević, T.10619-10623 (open); VS-1134, T.10774-10775 (open); [REDACTED]; VS-061, [REDACTED], 10037-10038 (open) (heard from others that ŠEŠELJ read a list of names, including VS-061's name); Paulić, T.11906, 11918-11919 (open); Exh.P00556, p.2 (public).

in Hrtkovci I did not call out the names of Croats who should be expelled, but I read a list of Croats from Hrtkovci who went to Croatia and were serving in the Ustasha National Guards Corps.¹⁵⁴¹

503. In 2005, **ŠEŠELJ** denied personally reading out the list of names during his 6 May 1992 speech in Hrtkovci, but stated that it made little difference because the list had been read out, with his support, by a fellow SRS member.¹⁵⁴² **ŠEŠELJ** identified the SRS member as being Milan ZILIĆ.¹⁵⁴³ In 2005, **ŠEŠELJ** explained that

it comes down to the same thing, because I was standing next to him [ZILIĆ] when he was reading them out. I don't have time to go into details here when I'm explaining things. But I do stand behind that list. It was read out by a member of my party who was standing next to me...when a member of my party read out that list, it comes to the same thing as if I had read it out.¹⁵⁴⁴

504. Whether **ŠEŠELJ** personally read out the list of names, or whether he by his mere charismatic presence supported the list read out by ZILIĆ, **ŠEŠELJ** made it clear that his party knew the names of individuals who were ZNG members, and he conveyed the message that those individuals were no longer welcomed in Hrtkovci.¹⁵⁴⁵ **ŠEŠELJ** implicitly called for their elimination by labelling them as “disloyal” enemies and members of “Ustasha” forces. Croats considered the very existence of this list to be highly significant.¹⁵⁴⁶ **ŠEŠELJ**'s reputation and political power were such that his support for the list instilled fear in the targeted individuals, their families and the broader Croat population in Hrtkovci.¹⁵⁴⁷

505. On 28 May 1992, **ŠEŠELJ** spoke at an SRS press conference continuing to call for the expulsion of Croats in retaliation for the mistreatment of Serbs in Croatia:

If the new Ustasha chief & Tito's general, Franjo Tuđman expelled 300,000 Serbs from Croatia then what business do 100,000 Croats have in Serbia? We have to settle these expelled Serbs somewhere, we will move them into Croatian houses and flats in Serbia.¹⁵⁴⁸

¹⁵⁴¹ Exh.P00300 (public).

¹⁵⁴² Šešelj, Exh.P00031, pp.1304-1305 (public).

¹⁵⁴³ VS-067, T.15497-15498 (open); VS-061, T.10038 (open). See also Exh.P00547, p.1 (public) (“ŽIRIĆ”).

¹⁵⁴⁴ Šešelj, Exh.P00031, pp.1304-1305 (public).

¹⁵⁴⁵ Ejić, T.10341-10342 (open).

¹⁵⁴⁶ VS-067, T.15404 (open).

¹⁵⁴⁷ Paulić, T.11931 (open) (brother was on the list).

¹⁵⁴⁸ Exh.P01199, p.4 (public).

4. ŠEŠELJ committed forcible displacement in Hrtkovci through hate speech

506. Local Croats took ŠEŠELJ's threats very seriously,¹⁵⁴⁹ particularly because "a lot of people had a very good idea of what had happened in Vukovar and some Bosnian towns, that grave crimes had been committed including killing of non-Serbs."¹⁵⁵⁰ In light of those recent events, Croats felt that ŠEŠELJ's speech on 6 May 1992 was a "warning sign" which "could not be ignored".¹⁵⁵¹ They understood it as a threat and a number of Croats left Hrtkovci as a direct result of ŠEŠELJ's speech.¹⁵⁵² The rally also caused Croats to leave not only Hrtkovci, but also Platičevo, Nikinci and other villages in the directions of Putinci and Šid where the population was either mixed or predominantly Croat.¹⁵⁵³

507. Throughout Hrtkovci, news of ŠEŠELJ's speech spread rapidly because "everybody" was talking about it.¹⁵⁵⁴ Many Croats who had not attended the rally soon heard about ŠEŠELJ's insults and threats by word of mouth.¹⁵⁵⁵ Details of the speech were subsequently published in the newspaper "Borba".¹⁵⁵⁶

508. Witness PAULIĆ, a Croat who was present at the rally, explained her interpretation of ŠEŠELJ's speech:

You can't survive here. Get out here -- get out of here, save your skin and that of your family, any way you know how. The message was that we Croats and Hungarians had to get out of that village.¹⁵⁵⁷

509. [REDACTED] was not present at the 6 May 1992 rally, but heard from other people that ŠEŠELJ had

called upon the people, telling them how things were going to be, that he would have power in his hands, and what really hurt me was that people took it as a situation where they had to leave; and nobody really felt like leaving and leaving the property they had

¹⁵⁴⁹ Paulić, T.11909-11910 (open).

¹⁵⁵⁰ VS-067, T.15406 (open).

¹⁵⁵¹ VS-067, T.15406, 15411-15413 (open).

¹⁵⁵² VS-061, T. 9923-9926, 9941, 10036-10037 (open); Baričević, T.10619, 10622 (open); e.g. [REDACTED]; Ejić, T.10340 (open).

¹⁵⁵³ [REDACTED].

¹⁵⁵⁴ Paulić, T.11932 (open).

¹⁵⁵⁵ [REDACTED]; VS-067, T.15403-15405 (open); VS-1134, T.10774-10775 (open); [REDACTED].

¹⁵⁵⁶ Baričević, T.10625 (open); Exh.P00556 (public).

¹⁵⁵⁷ Paulić, T.11909-11910 (open).

acquired over many years, but they were forced. They felt they were forced.¹⁵⁵⁸

510. The Croat population started leaving Hrtkovci after **ŠEŠELJ**'s speech "because they were afraid to stay. That's when it all started."¹⁵⁵⁹ From that time onwards, people "were asking for documents [to enable them to move to Croatia] en masse. They were standing in queues and waiting, like in embassies."¹⁵⁶⁰

511. Witness Baričević, a Croat who had lived in Hrtkovci all his life, heard **ŠEŠELJ**'s speech at the rally. Nine days later, Baričević sent his family to Croatia,¹⁵⁶¹ having signed a housing exchange contract with a Serb from Jakšić, Croatia. Baričević exchanged two new houses in Hrtkovci for a much older, badly damaged one in Croatia,¹⁵⁶² and then left Hrtkovci immediately "because that is what was said at the rally of 6 May 1992".¹⁵⁶³

512. [REDACTED], moved from Hrtkovci as a result of the 6 May 1992 speech.¹⁵⁶⁴ VS-067 did not attend the rally, but learned what **ŠEŠELJ** had said and that his name had been read out from a list of Croats who were explicitly told to leave.¹⁵⁶⁵ VS-067 was aware that **ŠEŠELJ** had given similar speeches on other occasions,¹⁵⁶⁶ and given **ŠEŠELJ**'s political prominence at the time, VS-067 placed particular weight on **ŠEŠELJ**'s threats.¹⁵⁶⁷ Fearing that his family could be targeted,¹⁵⁶⁸ [REDACTED].¹⁵⁶⁹ Within a week, he resigned from his job and spent the following six weeks travelling between Hrtkovci and Croatia organizing a housing exchange, at which point he and his family moved.¹⁵⁷⁰

¹⁵⁵⁸ [REDACTED]

¹⁵⁵⁹ [REDACTED]. *See also* T.10036-10037 (open).

¹⁵⁶⁰ VS-061, T.9920 (open). *See also* Exh.P00556, p.3 (public).

¹⁵⁶¹ Baričević, T.10640, 10647 (open).

¹⁵⁶² Baričević, T.10640-10641, 10646-10648 (open).

¹⁵⁶³ Baričević, T.10647 (open).

¹⁵⁶⁴ [REDACTED].

¹⁵⁶⁵ VS-067, T.15403-15404 (open).

¹⁵⁶⁶ VS-067, T.15405-15406 (open).

¹⁵⁶⁷ VS-067, T. 15411-15413 (open).

¹⁵⁶⁸ VS-067, T.15406 (open).

¹⁵⁶⁹ [REDACTED].

¹⁵⁷⁰ VS-067, T.15405-15407, 15426 (open).

(a) ŠEŠELJ associates and supporters continued the persecutory campaign against non-Serbs

513. After the 6 May 1992 rally, supporters and associates of ŠEŠELJ's began a massive campaign of discrimination, harassment and intimidation directed at Croats in Hrtkovci.¹⁵⁷¹ Groups of militant Serbs harassed Croats in person and over the telephone, threatening them with death.¹⁵⁷² VS-1134, a local Croat, testified that "threats were coming in every day".¹⁵⁷³ Hand grenades were thrown at Croat houses,¹⁵⁷⁴ dogs were killed,¹⁵⁷⁵ and bomb threats were also frequent.¹⁵⁷⁶ Croats were beaten,¹⁵⁷⁷ and at least one local Croat, Mijat ŠTEFANAC, was killed and his body was mutilated.¹⁵⁷⁸ Inhabitants of Hrtkovci were acutely aware of this incident, demonstrating the psychological effect it had on the village. [REDACTED] because a person of Croat ethnicity had been murdered "people were made aware of the fact that this was very, very serious and that one could count on this happening in the future."¹⁵⁷⁹ [REDACTED] ŠTEFANAC was taken out of Hrtkovci to a neighbouring village "so that people there would be frightened too."¹⁵⁸⁰ Local municipal leaders who disapproved of this campaign were intimidated into abandoning their posts, which SRS-affiliates assumed.¹⁵⁸¹

514. After the rally, SIBINČIĆ and ČAKMAK facilitated ŠEŠELJ's euphemistic "exchange of population" – which was the forcible displacement of non-Serbs. This was a systematic campaign designed to harass and force Croats into leaving the village. As the main facilitators of the campaign, SIBINČIĆ and ČAKMAK were both later convicted of "violence against the freedoms and rights of citizens belonging to other nations, ethnic groups, or an ethnic minority".¹⁵⁸² ŠEŠELJ interceded on

¹⁵⁷¹ [REDACTED]; Exh.P00555 (public); Exh.P00556 (public); Exh.P00557 (public); Exh.P00559 (public); [REDACTED]; Ejić, T.10328 (open); Baričević, T.10626-10634 (open); [REDACTED].

¹⁵⁷² Baričević, T.10632 (open); [REDACTED]; Exh.P00556, p.2 (public); VS-1134, T.10777 (open), [REDACTED].

¹⁵⁷³ VS-1134, T.10777 (open); [REDACTED].

¹⁵⁷⁴ [REDACTED].

¹⁵⁷⁵ Exh.P00559, p.2 (public).

¹⁵⁷⁶ [REDACTED]

¹⁵⁷⁷ [REDACTED].

¹⁵⁷⁸ Exh.P00557, p.1 (public); [REDACTED].

¹⁵⁷⁹ [REDACTED].

¹⁵⁸⁰ [REDACTED].

¹⁵⁸¹ [REDACTED]; Ejić, T.10528 (public); Exh.P00550, p.3 (public); Exh.P00559, p.2 (public).

¹⁵⁸² Exh.P00554, p.18 (public).

behalf of SIBINČIĆ seeking to get him released and at trial said he would have “done that again”.¹⁵⁸³

515. SIBINČIĆ held regular meetings of the local commune, which brought together Serbs from Hrtkovci and neighbouring villages as well as Serb refugees.¹⁵⁸⁴ ČAKMAK frequently spoke at these meetings.¹⁵⁸⁵ The local commune passed a number of official decisions to emphasise the exclusively “Serb” character of Hrtkovci. For example, the commune changed the name of Hrtkovci to “Srbislavci”, meaning “Glorifiers of Serbs”, and erected signposts at the exit and entry points of the village to reflect this change.¹⁵⁸⁶ ŠEŠELJ adopted this new name when referring to the village in his public speeches.¹⁵⁸⁷ A local school also had its name changed from the Croat “Vladimir Nazor” to the Serb “Vuk Karadžić”.¹⁵⁸⁸

516. SIBINČIĆ advised the Serbs to draw up false contracts with the Croat owners, stating that such documents “will suffice as far as the police is concerned. No one will be able to do anything to you.”¹⁵⁸⁹

517. A clear pattern of behaviour developed as Serbs physically and psychologically pressured local Croats to give up their houses. Groups of men would walk around the village harassing the Croat villagers into exchanging their houses.¹⁵⁹⁰ They would sit in cafes wearing Chetniks’ uniforms and frighten local Croats.¹⁵⁹¹ [REDACTED] five to six men would constantly break into his backyard and tell him he had to leave. He was threatened at gunpoint. He stated that the men would show their pistols and hand grenades.¹⁵⁹² After enduring these threats, [REDACTED] fled Hrtkovci.¹⁵⁹³ BARIČEVIĆ’s daughter was threatened on her way from school. She was asked “Who is your father’s favourite, you or your brother? Because he can only take one of you with him to Croatia and you know what is going to happen to the other one”. Consequently, on 12 May 1992, BARIČEVIĆ sent his wife and children

¹⁵⁸³ VS-067, T.15555-15556 (open).

¹⁵⁸⁴ Ejčić, T.10382,10384-10385 (open).

¹⁵⁸⁵ Ejčić, T.10380-10381 (open); VS-067, T.15425-15426 (open).

¹⁵⁸⁶ Ejčić, T.10382-19383 (open).

¹⁵⁸⁷ E.g. Exh.P01202, p.10 (public).

¹⁵⁸⁸ Exh.P00549 (public).

¹⁵⁸⁹ Ejčić, T.10380, 10573-10575 (open).

¹⁵⁹⁰ [REDACTED].

¹⁵⁹¹ [REDACTED].

¹⁵⁹² VS-1134, T.10777 (open), [REDACTED]

¹⁵⁹³ [REDACTED].

to Croatia in order to keep them safe while he stayed in Hrtkovci to continue working and to organise a housing swap.¹⁵⁹⁴ In some cases, mobs of armed Serbs and Chetniks would tell the Croat occupants to leave, often threatening them with violence or death if they refused.¹⁵⁹⁵ In the case of Katica PAULIĆ, Serb refugees simply moved into her house and told her that she had to leave.¹⁵⁹⁶

518. Many Croats were forced to leave Hrtkovci during May and June 1992 after first “exchanging” their homes in this way.¹⁵⁹⁷ All of these incidents were part of the coordinated effort to force local Croats to leave Hrtkovci. The police often turned a blind eye to the incidents and told Croats that they were not authorised to help them.¹⁵⁹⁸ Occasionally, the police even assisted and protected the perpetrators.¹⁵⁹⁹ For example, [REDACTED] a special Police Unit was sent to prevent forcible expulsions but instead, they assisted the leaders of the Serbian Chetnik Movement to escort Croats out of areas.¹⁶⁰⁰ When concerned members of the local commune went to the DB Serbia about the problems in Hrtkovci, the person in charge of the area, Slavko KULUNDZIĆ, simply said “whoever has to leave, let them leave”.¹⁶⁰¹

519. In August 1992, ŠEŠELJ, in a published interview, continued to threaten remaining Croats in Hrtkovci that once the SRS was in power, their forcible displacement would be accomplished through decree.¹⁶⁰²

520. The effectiveness and widespread nature of the forcible expulsion programme are evidenced by the mass departure of Croats from Hrtkovci.¹⁶⁰³ In 1991, Hrtkovci had a Croat population of 1,006, representing approximately 40% of the village’s total population.¹⁶⁰⁴ As a result of ŠEŠELJ’s speech and the ensuing campaign he promoted, the Croat population in Hrtkovci declined by 76.3 percent during 1992,¹⁶⁰⁵

¹⁵⁹⁴ Baričević, T.10640, 10647 (open).

¹⁵⁹⁵ Baričević, T.10626 (open); VS-1134, T.10777 (open); [REDACTED]; Exh.P00559, p.2 (public).

¹⁵⁹⁶ Paulić, T.11910-11911 (open).

¹⁵⁹⁷ Ejić, T.10391, (open); [REDACTED].

¹⁵⁹⁸ Ejić, T.10535 (open); Baričević, T.10626 (open); [REDACTED]; VS-1134 T.10787 (open); Paulić, T.11911 (open); Exh.P00559 (public).

¹⁵⁹⁹ [REDACTED]; VS-1036, T.11911 (open).

¹⁶⁰⁰ [REDACTED].

¹⁶⁰¹ Baričević, T.10626 (open).

¹⁶⁰² Exh.P01203, p.6 (public).

¹⁶⁰³ Exh.P00565, p.34 (public).

¹⁶⁰⁴ Exh.P00565, pp.9-10, 34 (public).

¹⁶⁰⁵ Exh.P00565, p.34 (public).

and the overwhelming majority of those departures took place during May and June.¹⁶⁰⁶

521. In fact, a strong causal inference is raised by the temporal connection between ŠEŠELJ's speech and the departure of a large number of Croats from Hrtkovci.¹⁶⁰⁷ This mass departure is evidenced by the dramatic increase in the number of requests for marriage and christening certificates from the Catholic Church in Hrtkovci in May 1992. Croats wishing to leave Serbia first obtained these certificates from their local Catholic Church so that they could present them to the Croatian authorities upon their arrival in the country.¹⁶⁰⁸ Since the requests for church certificates were generally made when Croat families were leaving Hrtkovci, they can be seen as a proxy for departures of the Croat population from the village.¹⁶⁰⁹

522. During the four-month period from January to April 1992, the Catholic Church in Hrtkovci received between 13 and 19 requests for christening certificates.¹⁶¹⁰ In April 1992, there were between six and nine requests. In May, requests jumped to between 50 and 72 requests,¹⁶¹¹ with the first requests being lodged just two days after ŠEŠELJ's speech. The number of daily requests peaked approximately one week later.¹⁶¹² In light of the inflammatory content of ŠEŠELJ's 6 May 1992 speech and how rapidly news of its contents spread through Hrtkovci, the logical inference from these figures is that a number of Croats made the decision to leave Hrtkovci, and did in fact leave, as a result of ŠEŠELJ's speech.

523. The attack against the Croat inhabitants of Hrtkovci throughout May-August 1992 led to the displacement of at least 700-800 Croats, which transformed Hrtkovci into an almost exclusively Serb village.¹⁶¹³ An analysis of the out-migration from Hrtkovci in 1992 shows that at least 722 individuals left Hrtkovci in 1992, or early 1993, in relation to the events in May-August 1992,¹⁶¹⁴ and that the overwhelming

¹⁶⁰⁶ Exh.P00565, pp. 27-29 (public). *See also* Exh.P00558 (public).

¹⁶⁰⁷ Exh.P00565, pp.32-34 (public).

¹⁶⁰⁸ Exh.P00565, pp. 3-4 (public); [REDACTED].

¹⁶⁰⁹ Exh.P00565, p.4 (public).

¹⁶¹⁰ Exh.P00565, p.22 (public).

¹⁶¹¹ Exh.P00565, p.22 (public).

¹⁶¹² Exh.P00565, p.23 (public).

¹⁶¹³ Exh.P00558 (public); Exh.P00565, pp.32-34 (public); [REDACTED].

¹⁶¹⁴ Exh.P00565, pp.27-28 (public).

majority of those individuals moved to Croatia.¹⁶¹⁵ The data further suggests that, of those individuals who left Hrtkovci in 1992, around 557 left in May-August compared with around 74 in January-April.¹⁶¹⁶

524. According to **ŠEŠELJ**, he and his party were satisfied with the results of the drastic demographic change in Hrtkovci.¹⁶¹⁷

5. **ŠEŠELJ** intended the displacement of non-Serbs

525. **ŠEŠELJ**'s speeches from April and May 1992 outlined his party's plan for the coordinated expulsion of Croats from Hrtkovci and elsewhere in Vojvodina and demonstrate the systematic nature of the campaign against local Croats. The evidence indicates that **ŠEŠELJ**'s speech was the predominant cause of the departure of a number of Croats from Hrtkovci. **ŠEŠELJ**'s speech was effective precisely because he deliberately took advantage of historical grievances and existing tensions in Hrtkovci. Those grievances and tensions should be viewed as part of the context of **ŠEŠELJ**'s speech, which he exploited to his advantage, rather than as operative causes of the displacement in themselves.

526. Meanwhile, **ŠEŠELJ** continued to use his televised appearances to advocate expulsion of Croats from towns and villages in Vojvodina, including Hrtkovci, Slankamen, and Zemun – places he claimed were colonized by “the worst Ustashas”.¹⁶¹⁸

¹⁶¹⁵ Exh.P00565, p.30 (public).

¹⁶¹⁶ Exh.P00565, pp.27-29 (public).

¹⁶¹⁷ Exh.P00031, p.1306 (public).

¹⁶¹⁸ Exh.P01201, p.20 (public).

VII. THE LEGAL ELEMENTS OF THE CRIMES CHARGED HAVE BEEN MET

527. **ŠEŠELJ** is charged with individual criminal responsibility under Article 7(1) for committing, instigating and otherwise aiding and abetting the crimes set out in the Indictment.¹⁶¹⁹

528. In terms of “committing”, **ŠEŠELJ** is charged with participating with others in a JCE with the objective of the permanent forcible removal of the majority of non-Serbs from targeted areas of Croatia, BiH and Serbia through the commission of crimes in order to make these areas part of a Serb-dominated state.

529. **ŠEŠELJ** is also charged with physically committing the following crimes:

- persecution, through his expressions of “hate speech,” in Vukovar and in Hrtkovci, and through deportation and forcible transfer in Hrtkovci; and
- deportation and forcible transfer in Hrtkovci.¹⁶²⁰

A. War Crimes were Committed (Article 3)

530. **ŠEŠELJ** is charged with six counts of war crimes, the elements of which have been met: murder under Article 3 (Common Article 3(1)(a) of the Geneva Conventions) (Count 4); torture under Article 3 (Common Article 3(1)(a) of the Geneva Conventions) (Count 8); cruel treatment under Article 3 (Common Article 3(1)(a) of the Geneva Conventions) (Count 9); wanton destruction under Article 3(b) (Count 12); destruction or wilful damage done to institutions dedicated to religion or education under Article 3(d) (Count 13); and plunder of public or private property under Article 3(e) (Count 14).

¹⁶¹⁹ Report of the Secretary-General pursuant to Paragraph 2 of Security Council Resolution 808 (1993), S/25704, 3 May 1993 (UN Report), paras.53-54. *Kordić* TJ, para. 364; *Tadić* AJ, para.186.

¹⁶²⁰ Indictment, para.5.

1. Chapeau requirements for Violations of the Laws or Customs of War (Article 3)

(a) Nexus to an armed conflict and Accused's awareness thereof

531. At all times relevant to the Indictment, one or more armed conflicts existed, in the required sense,¹⁶²¹ in the territory of Croatia and Bosnia-Herzegovina. At first, when Bosnia-Herzegovina was still part of the SFRY, the armed conflict centered on Slovenia and Croatia, both of which declared independence on 25 June 1991. This conflict increased in intensity and continued throughout the period during which crimes were committed in and around Vukovar.¹⁶²² The conflict between SFRY and Croatia exacerbated tensions amongst the three ethnic groups in BiH. Later the conflict became focused on the territory of Bosnia-Herzegovina, and armed clashes erupted during April 1992 at the latest in connection with the declarations of independence of Bosnia-Herzegovina and the Bosnian-Serb Republic, and continued beyond the indictment period.¹⁶²³

532. The crimes charged, for which **ŠEŠELJ** bears liability, were closely linked to the armed conflict.¹⁶²⁴ The armed conflict was connected with the purpose for which the crimes were committed – as both the conflict and the crimes that occurred during the conflict were aimed at achieving a “Greater Serbia”. For example, Vukovar was within the Karlobag-Ogulin-Karlovac-Vitrovica line, which the Accused saw as part of “Greater Serbia”.¹⁶²⁵ Similarly, **ŠEŠELJ** stated as early as January 1991 that Bosnia was “very simply, a Serbian land [that] will be part of one single Serbia country”.¹⁶²⁶ The armed conflict also influenced the perpetrators’ ability to commit the crimes and affected the manner in which they carried them out. In the effort to create a “Greater Serbia”, the non-Serb civilian populations were brutally suppressed in villages and detention centres. At the Velepromet warehouse and Ovčara farm in and around Vukovar, members of the Serb forces violently mistreated and killed

¹⁶²¹ *Tadić* Jurisdiction Decision, paras.67-70, 137; *Kunarac et al.* AJ, paras.57-59. See also *Kordić* AJ, para.341; *Galić* AJ, para.120.

¹⁶²² E.g. AFII-10,12-13,26-27, 42-60, 111-114, 122; Exh.P01277 (public).

¹⁶²³ E.g. Exh.P00959, p.2 (public) (referring to 6 April 1992 Decision on the Declaration of the State of War in the Territory of the Serbian Municipality of Zvornik); Exh.P00966, pp.13-14 (public) (referring to the ongoing battle in Sarajevo); [REDACTED]; Tot, Exh.P00846, p.1 (public) (both noting that in early April 1992 the JNA began the daily shelling of Mostar); AFIV-181 (in June 1992, Serb forces shelled Presjeka village in Nevesinje municipality). See also section VI.

¹⁶²⁴ *Naletilić and Martinović* AJ, paras.118-121.

¹⁶²⁵ Exh.P00298 (public); T.5108-5109 (open).

¹⁶²⁶ Exh.P01339, p.1 (public).

Croatian soldiers *hors de combat* and civilians.¹⁶²⁷ Serb forces similarly mistreated and killed detainees in detention camps and other non-Serbs at sites in and around Zvornik, “Greater Sarajevo”, Mostar and Nevesinje.¹⁶²⁸ The perpetrators of these crimes were members of the Serb forces, which were in Croatia and Bosnia under the guise of the armed conflict. Similarly, Serb forces were responsible for the crimes of wanton destruction, destruction of cultural and religious objects, and plunder committed in Vukovar, Zvornik, “Greater Sarajevo”, Mostar and Nevesinje, demonstrating the direct link between these crimes and the armed conflict.

533. **ŠEŠELJ**, as one of the most prominent politicians in Serbia at the relevant time was aware that his acts were closely related to the armed conflict. From at least 1990, through his public speech and relentless call for the establishment of an expanded or “Greater” Serbia, **ŠEŠELJ** was one of the main framers of the ideological context in which the subsequent armed conflict in Croatia and BiH would take place. Through his efforts to mobilize his **Šešeljevci** in ongoing cooperation with other JCE Members, **ŠEŠELJ** directly participated in the creation of a Serb fighting force, which he then deployed to conflict areas and coordinated and supported throughout the conflict. For example, he repeatedly spoke of the strategic importance of Vukovar,¹⁶²⁹ received reports and communicated directly with his commanders on the Vukovar battlefield.¹⁶³⁰ He also spoke publicly and explicitly about the acquisition by Serb forces of areas in “Greater Sarajevo”, and the key role that **Šešeljevci** played therein,¹⁶³¹ and visited the frontlines and his commanders on several occasions.¹⁶³² Similarly, he knew of the presence of the Serb armed forces, including his **Šešeljevci**, in Mostar and Nevesinje, and that their crimes were linked to the armed conflict.¹⁶³³ He demonstrated his knowledge, in particular with respect to the expulsion and terrorisation of non-Serbs when, in the immediate aftermath of the attack on Zvornik,

¹⁶²⁷ See sections V. F. 2. (c) V. F. 2. (d) and V. F. 2. (e) .

¹⁶²⁸ E.g. sections VI. A. 2. (d) ; VI. B. 1. (d) and VI. C. 2. (c) .

¹⁶²⁹ Exh.P00298 (public); T.5108-T5109 (open) (**ŠEŠELJ** told an interviewer Serbia should claim lands up to the Karlobag-Karlovac-Vitrovnica line – seizing 2/3 of Croat territory - and “if that is not enough for the Croats, we will take everything.”); Exh.P00039 (public).

¹⁶³⁰ See above V. F. 1. (b) (iii) .

¹⁶³¹ E.g. Exh.P01230, p.11 (public) (referring to Serbian Sarajevo and Serbian Grbavica **ŠEŠELJ** says “*Volunteers from the Serbian Radical Party are fighting there. Actually, they started the first armed operations in Sarajevo*”).

¹⁶³² See above VI. B. 1. (a) (v) .

¹⁶³³ **Šešelj**, P00031, pp.665, 862 (public); Exh.P01002, p.1 (public). See also T.15361 (open) (**Šešelj** admitting that his volunteers were in the area).

he stated that the function of the JNA, and later the VRS, was “not to prevent interethnic conflict but to demarcate what is Serbian”.¹⁶³⁴

(b) Tadić Conditions

534. The crimes, with which **ŠEŠELJ** is charged and that are not specifically listed in art. 3 of the Statute, all constitute violations of international humanitarian law, recognised in customary law and in applicable treaties binding on the parties, protecting important values and entailing individual criminal responsibility.¹⁶³⁵ Murder, torture, and cruel treatment are prohibited under Common Article 3 of the Geneva Conventions, which is regarded as being part of customary international law,¹⁶³⁶ and serious violations thereof satisfy the four requirements mentioned above. Customary international law imposes criminal liability for serious violations of Common Article 3.¹⁶³⁷ All the crimes that **ŠEŠELJ** is responsible for involved grave consequences for the victims, as discussed in the specific crime base sections below.

(c) Requirements for Common Article 3 crimes

535. Additionally, where a crime punishable under Article 3 is based upon Common Article 3, the victims of the alleged violation of the laws and customs of war must have taken no active part in the hostilities at the time the crime was committed.¹⁶³⁸ Such victims include members of armed forces who have laid down their arms and those placed *hors de combat* by sickness, wounds, detention, or any other cause.¹⁶³⁹ In addition, the Trial Chamber must be satisfied that “the perpetrator of a Common Article 3 crime knew or should have been aware that the victim was taking no active part in the hostilities when the crime was committed”.¹⁶⁴⁰ These additional requirements are fulfilled for all the crimes under Article 3 for which **ŠEŠELJ** is responsible, as discussed in the specific crime base sections below.

¹⁶³⁴ Exh.P01363, p.53 (public).

¹⁶³⁵ *Tadić* Jurisdiction Decision, paras.94, 143. *E.g. Kumarac et al.* AJ, para.66; *Aleksovski* AJ, para.20.

¹⁶³⁶ *Tadić* Jurisdiction Decision, para.98.

¹⁶³⁷ *Tadić* Jurisdiction Decision, para.134; *Čelebići* AJ, para.125 and TJ, para.408.

¹⁶³⁸ *Čelebići* AJ, para.420.

¹⁶³⁹ Common Article 3. *See also Čelebići* AJ, para.420.

¹⁶⁴⁰ *Boškoski and Tarčulovski* AJ, para.66.

2. The elements of the specific crimes charged have been met

(a) Article 3: Murder (Count 4)

536. The evidence listed in Annex B proves that the victims are dead and that they were deliberately murdered by Serbs forces, including Šešeljević.¹⁶⁴¹ Serb forces intentionally targeted non-Serbs, who were defenceless civilians or *hors de combat*, often in organized, mass-scale executions or in camps where the victims were detained.¹⁶⁴²

(b) Article 3: Torture (Count 8) and Cruel Treatment (Count 9)

537. The evidence discussed above¹⁶⁴³ and laid out in Annex C shows that Serb forces, including Šešeljević, committed torture¹⁶⁴⁴ and cruel treatment¹⁶⁴⁵ throughout the Indictment Municipalities. Serb forces systematically and deliberately rounded up non-Serbs, transferred them into detention facilities where they were held in inhumane conditions, without adequate hygiene or food and were subjected to constant abuse. Detainees were severely beaten for a prohibited purpose, namely to obtain information and because of their ethnicity. They were forced to say Christian prayers and crosses were carved in their skin; were sexually assaulted and humiliated; were arbitrarily removed from the detention site and never returned; witnessed fellow detainees being murdered; were forced to perform military tasks¹⁶⁴⁶ and work at frontlines in conditions of extreme danger, where they would see their fellow detainees being killed or injured and were subsequently forced to bury the dead.¹⁶⁴⁷ The prolonged period during which the detainees were physically abused, as well as the enormous danger and constant uncertainty all resulted in the infliction of severe

¹⁶⁴¹ Čelebići AJ, paras.422-423, 437; Brđanin TJ, para.381; Stakić TJ, para.584; Kvočka TJ, para.132; Krstić TJ, para.485; Blaškić TJ, paras.153, 217; Kupreškić TJ, paras.560-561; Jelisić TJ, para.35; Kvočka AJ, para.261; Kordić and Čerkez AJ, para.37; Strugar TJ, para.236; Krnojelac TJ, para.324; Akayesu TJ, para.589.

¹⁶⁴² E.g. [REDACTED]; VS-1055, T.7905 (open); VS-1060, T.8608 (open); [REDACTED]; Tot, Exh.P00843, para.92 (public); VS-1062, T.5962 (open); [REDACTED]; VS-1013, T.5235 (open); Ković, Exh.P00362, p.5 (public); [REDACTED]; VS-1064, T.8698-8702 (open); [REDACTED]; VS-1065, T.6301-6304, 6310 (open); [REDACTED]; Exh.P00602 (public); Karlovic, T.4687-4692 (open); Bosanac, Exh.P00603, paras.29-30 (public); [REDACTED].

¹⁶⁴³ See sections V. F. 2. (d) V. F. 2. (e) ; VI. A. 2. (d) ; VI. B. 1. (d) ; VI. C. 2. ; VI. C. 3.

¹⁶⁴⁴ Čelebići TJ, paras.495-96, 940-43, 963-65; Furundžija TJ, paras.264-69; Akayesu TJ, para.597; Haradinaj AJ, para.290; Kvočka AJ, para.289; Kunarac AJ, paras.142, 144; Naletilić AJ, para.299.

¹⁶⁴⁵ Čelebići AJ para.424; Čelebići TJ, para.468; Krnojelac TJ, paras.131, 181; Lukić & Lukić TJ, para.958; Limaj TJ, para.231; Strugar TJ, para.261; Orić TJ, paras.352-353; Simić et al. TJ, para.75.

¹⁶⁴⁶ See Blaskić AJ, para.597.

physical and psychological suffering. The civilian or *hors de combat* status of the victims was readily apparent from the prevailing conditions, specifically non-Serbs were detained or under house arrest and not armed when the abuses occurred.

(c) Article 3(b), (d), (e): Wanton Destruction (Count 12), Destruction or Wilful Damage to Institutions Dedicated to Religion or Education (Count 13), Plunder of Public or Private Property (Count 14)

538. The crimes discussed above¹⁶⁴⁸ and specified in Annex E prove wanton destruction and wilful damage to religious or educational institutions¹⁶⁴⁹ and plunder of private and public property.¹⁶⁵⁰ The destruction of property of the non-Serb population in the Indictment Municipalities was large scale, intentional, and not justified by military necessity. This is evidenced, for example, by the indiscriminate shelling of towns and villages, as in the case of Mostar and Svrake,¹⁶⁵¹ which cannot be justified by military necessity. Mosques, churches and other symbols of non-Serb cultures were specifically targeted. Serb forces also intentionally carried out large scale looting of non-Serb property, often sending the looted goods to Serbia to be re-sold.¹⁶⁵²

B. Crimes Against Humanity were Committed (Article 5)

539. **ŠEŠELJ** is charged with three counts of crimes against humanity, the elements of which have been established: persecution under Article 5(h) (Count 1), deportation under Articles 5(d) (Count 10), and inhumane acts (forcible transfer) under Article 5(i) (Count 11).

¹⁶⁴⁷ See sections V. F. 2. (d) V. F. 2. (e) ; VI. A. 2. (d) ; VI. B. 1. (d) ; VI. C. 2. ; VI. C. 3.

¹⁶⁴⁸ See sections V. F. 1. (c) ; VI. A. 2. (e) ; VI. B. 1. (e) ; VI. C. 2. (a) ; VI. C. 3. (a) .

¹⁶⁴⁹ *Kordić* AJ, para.74; *Blaškić* TJ, para.157; *Strugar* TJ, para.295; *Brdanin* AJ, para.337; *Martić* TJ, para.96; *Strugar* AJ, paras.270, 310. See also *Rajić*, Review of the Indictment Pursuant to Rule 61 of the Rules of Procedure and Evidence, Case No. IT-95-12-R61, 13-Sept-1996, paras.52–53, 56. See also Article 4(1) and (3), 1954 Hague Cultural Property Convention.

¹⁶⁵⁰ *Kordić* AJ, paras.79, 84; *Kordić* TJ, para.352; *Naletilić* TJ, p.1498 ; *Hadžihasanović and Kubura* TJ, para.50; *Martić* TJ, para.104.

¹⁶⁵¹ See VI. B. 1. (e) ; VI. C. 2. (a) .

¹⁶⁵² See e.g. VI. B. 1. (b) (iii) .

1. Chapeau requirements for crimes against humanity (Article 5)

540. The common *chapeau* elements required to establish crimes against humanity are:

- a. As a jurisdictional requirement, the existence of an armed conflict;
- b. The existence of a widespread or systematic attack directed against a civilian population;
- c. The Accused's acts (or the acts for which the Accused is criminally responsible)¹⁶⁵³ were part of a widespread or systematic attack directed against a civilian population;¹⁶⁵⁴
- d. The Accused was aware of the attack on the civilian population and that the acts for which he is criminally responsible comprised part of that attack.¹⁶⁵⁵

(a) A state of armed conflict existed at all times relevant to this Indictment

541. As noted above, at all times relevant to the Indictment, a state of armed conflict existed¹⁶⁵⁶ in Croatia and the Republic of Bosnia and Herzegovina. As Serb refugees started fleeing the conflict in Croatia and arriving in Vojvodina, Serbia, in 1991 and 1992, ethnic tension in Hrtkovci raised. The discrimination against Croats, whom ŠEŠELJ accused of conspiring with TUĐMAN as *Ustašas*, increased.¹⁶⁵⁷ ŠEŠELJ's 6 May 1992 discriminatory speech took place in this context, it was directly linked to the ongoing armed conflict in Croatia, and it directly caused Croats to flee from Hrtkovci and a massive campaign of intimidation against those who did not flee immediately.¹⁶⁵⁸ The crimes set out in the Indictment are clearly linked to the armed conflict in Croatia and BiH, which was used as an opportunity to forcibly remove non-Serbs from large parts of Croatia, BiH, and Serbia in pursuit of a

¹⁶⁵³ The acts of the accused include crimes for which an accused is criminally responsible. *See Martić* AJ, paras.255, 313-314 (equating "acts of the accused" with "crimes committed against them [victims]").

¹⁶⁵⁴ *Kordić* AJ, para.93 ("the acts of an accused"); *Kunarac* AJ, para.85; *Martić* AJ, paras.302, 313-314.

¹⁶⁵⁵ *Kordić* AJ, para.100; *Kunarac* AJ, para.102; *Blaškić* AJ, para.125; *Milutinović* TJ, para.143.

¹⁶⁵⁶ *Kunarac* AJ, paras.82-83; *Tadić* Jurisdiction Decision, paras.142, 249; *see also Kvočka* TJ, para.127; *Galić* TJ, para.139; *Kunarac* TJ, para.413; *Stakić* TJ, paras.623-24; *Naletilić* TJ, para.233; *Tadić* AJ, paras.239, 249, 251.

¹⁶⁵⁷ Exh.P00075, pp.1-7 (public); Exh.P00892 (public); Exh.P00893, pp.21-23 (public).

¹⁶⁵⁸ *See VI. D.*

“Greater Serbia”.¹⁶⁵⁹ Consequently, the jurisdictional requirement under Article 5 that the “widespread or systematic attack against the civilian population was carried out while an armed conflict in Croatia and/or Bosnia and Herzegovina was in progress” is satisfied, including in relation to Vojvodina.¹⁶⁶⁰

(b) A widespread or systematic attack directed against a civilian population

542. The evidence demonstrates that a widespread and systematic attack¹⁶⁶¹ was directed against civilian population in Croatia, Bosnia, and Vojvodina.¹⁶⁶² From August 1991 until at least the end of the indictment period (September 1993) an orchestrated campaign of violence and mistreatment was directed against the Croat, Muslim, and other non-Serb civilian population residing in the municipalities referred to in the Indictment. In order to take control over the municipalities, Serb forces attacked non-Serbs living in towns, villages, and smaller settlements, most of which were undefended and contained no military targets.

543. The means and methods of attack, the crimes committed and the attack’s discriminatory nature provide further proof that the attack was directed against civilian populations.¹⁶⁶³ The fact that some military personnel and persons *hors de combat*, were present in municipalities where the crimes for which **ŠEŠELJ** is responsible took place, does not negate the civilian nature of these populations for the purposes of Article 5.¹⁶⁶⁴ Large numbers of non-Serbs were systematically expelled from their homes and subjected to brutal treatment. Many non-Serbs were killed. Men were often arrested with no due process of law and taken to detention centres, while women and children were forced to leave their homes and often the municipality. Serb forces then looted and destroyed their houses, rendering it impossible for the civilians

¹⁶⁵⁹ See Exh.P00928 (public).

¹⁶⁶⁰ See *Šešelj* AD, Decision on the Interlocutory Appeal concerning Jurisdiction, 31 August 2004, para.14.

¹⁶⁶¹ *Naletilić* TJ, para.233; *Kunarac* TJ, paras.415-416, 429; *Kunarac* AJ, paras.86, 93-94, 98; *Blagojević* TJ, para.543; *Stakić* TJ, para.623; *Krajišnik* TJ, para.706; *Haradinaj* TJ, para.104; *Kordić* TJ, para.178; *Blaškić* AJ, paras.100-101, 120; *Kordić* AJ, paras.64, 94; *Krnjelac* TJ, para.57; *Tadić* TJ, paras.648, 653. *Blaškić* TJ, para.207; *Jelišić* TJ, para. 53; *Simić* TJ, para.44; *Naletilić* TJ, para.234; *Vasiljević* TJ, para.36; *Mrkšić* AJ, paras.25, 29-33; *Martić* AJ, para.309.

¹⁶⁶² See *Stakić* AJ, para.247 (quoting *Kunarac* AJ, para.90); *Simić* TJ, para.42; *Naletilić* TJ, para.235.

¹⁶⁶³ See *Kunarac* AJ, para. 91.

¹⁶⁶⁴ *Mrkšić* AJ, paras.25, 29-33; *Milutinović* TJ, (Vol. 1), para.146; *Martić* AJ, para.309. See *Kupreškić* TJ, para.549 (“Thus the presence of those actively involved in the conflict should not prevent the characterisation of a population as civilian and those actively involved in a resistance movement can

to return. Non-Serb men and women kept in detention were often beaten or raped by members of Serb forces, some of whom were employed as guards for the facility and others who were allowed access to the detention centres. The conditions in many of the detention centres were intolerable, with insufficient food, water, medical care, and hygiene facilities. Non-Serbs were systematically dismissed from employment in the armed forces, the police, municipal organs, and private and publicly owned companies. Many non-Serbs were compelled to sign over their property to the municipality or to local Serbs. Religious monuments and other cultural sites of significance to non-Serbs were destroyed.

544. The overarching attack on the non-Serbs civilian populations in parts of Croatia, Bosnia, and Vojvodina encompassed the crimes charged in the Indictment.

(i) Croatia, Vukovar

545. In Vukovar and other parts of Croatia falling within ŠEŠELJ's "Greater Serbia", Serb forces carried out a coordinated pattern of expulsions and terror against the non-Serb civilian populations. The systematic nature of the attacks is established by the coordinated conduct of the perpetrators - JNA, TO, and Šešeljevcı units - and the evident pattern of their suppression of non-Serbs. That the attacks were targeted, in part, against a civilian population is proven by: (i) the destruction of numerous villages, including Luzac, Opatovac, Stompajvcı, Tolonik, Trpinja, Bršadin, Petrovcı, Negoslavci and Borovo Naselje;¹⁶⁶⁵ (ii) the shelling and destruction of Catholic churches in Aljmas,¹⁶⁶⁶ Voćin and Vukovar;¹⁶⁶⁷ (iii) the forcible displacement of non-Serb civilians, which in Vukovar and its environs escalated even after fighting in the areas had ceased;¹⁶⁶⁸ (iv) the destruction of civilian targets including private homes and Vukovar hospital, and the "total" destruction of Vukovar;¹⁶⁶⁹ and (v) massacres and other abuse of non-Serb prisoners and/or civilians outside of combat in Macute, Bokane, Ceralije, Balinci, Cetekovac, Sekulinci, Kraskovic, Slatina, Cojlug, Dalj,

qualify as victims of crimes against humanity."'). *See also* Blaškić AJ, paras.113-115; Kunarac TJ, para.425.

¹⁶⁶⁵ AFII-111.

¹⁶⁶⁶ [REDACTED].

¹⁶⁶⁷ *E.g.* Matovina, T.6807-6809, 6816 (open); [REDACTED].

¹⁶⁶⁸ *See* Exh.P00632 (public) for generally, and for Vukovar pp.36, 39, 42 and annexes; AFIII-4; [REDACTED].

¹⁶⁶⁹ *See* AFIII-3.

Vocin, Luzac, and Vukovar.¹⁶⁷⁰ This series of organised acts of violence against Croats, which formed part of the large scale attack on the civilian populations, was itself both widespread and systematic. It consisted of numerous crimes against thousands of victims. It spanned many towns and villages and required the coordinated involvement of the various Serb armed forces.

546. In *Mrkšić* it was plead that there was a widespread or systematic attack on the civilian population in relation to Vukovar hospital alone. In *Mrkšić*, 93 percent of the *Mrkšić* victims were known to have been active in the armed forces.¹⁶⁷¹ As explained in the previous paragraph, the evidence in this case shows that the crimes in relation to Vukovar Hospital were as part of a widespread and systematic attack on the civilian non-Serb population in Croatia. On this basis, the circumstances are distinguishable from the circumstances of the victims in the *Mrkšić* Appeals Judgement.¹⁶⁷² On the evidence in this case it has been proven that although some victims from Vukovar Hospital were combatants *hors de combat* this does not alter the fact that the crimes committed were part of the widespread and systematic attack on non-Serb, civilian population in Croatia.

(ii) Bosnia

547. In Bosnia, Serb forces continued the coordinated pattern of expulsions and terrorisation of the non-Serb civilian populations. In Bosnian municipalities, such as Zvornik, where non-Serbs were a majority and had control over local institutions, Serb civilians were evacuated, whereupon Serbian paramilitary forces launched attacks, expelling the Muslims, Croats, and other non-Serbs in order to repopulate the areas with displaced Serbs. Vicious persecutory crimes were committed against the non-Serbs who did not flee.¹⁶⁷³ In Eastern Herzegovina (Mostar and Nevesinje), non-Serbs were systematically expelled from their homes by Serb forces through the use of threats, brutal violence and murder, as well as the shelling and burning of non-Serb inhabited areas. Non-Serbs were beaten, tortured, sexually assaulted, murdered, illegally forced to work in dangerous circumstances, and had their homes and

¹⁶⁷⁰ See generally, VS-004; Matovina; Exh.P00632 (public); [REDACTED]; Kulić; [REDACTED].

¹⁶⁷¹ *Mrkšić* AJ, para.36, fn. 114.

¹⁶⁷² *Mrkšić* AJ, para.42; *Mrkšić* TJ, paras.474-475.

¹⁶⁷³ See VS-1062, T.5962-5966 (open), [REDACTED] *see further below*.

Mosques plundered and destroyed.¹⁶⁷⁴ In “Greater Sarajevo” Serb forces attacked civilian towns and villages seeking, in furtherance of the forcible removal of the non-Serb populations, to establish physical Serb control over such territories.¹⁶⁷⁵ The systematic nature of the attacks is also apparent from the evidence showing, *inter alia*, the regularity of the attacks throughout BiH, the commonality of the perpetrators of the attacks¹⁶⁷⁶ and the consistent pattern of conduct demonstrated by the perpetrators.¹⁶⁷⁷ For example, during the attack on Lješevo village, in Ilijaš municipality, members of the civilian non-Serb population of the village were either summarily executed during the course of the attack or rounded up and forcibly removed to facilities where they were detained in inhumane conditions.¹⁶⁷⁸ This series of organised acts of violence, which formed part of the overarching attack on the civilian populations, was itself both widespread and systematic. It spanned a number of municipalities in Bosnia, including Zvornik, Sarajevo, Mostar and Nevesinje, as well as Bosanski Šamac, Bijeljina, and Brčko.¹⁶⁷⁹ It required the involvement of the Serb and Bosnian-Serb authorities, on central, regional, and municipal levels and was clearly directed against the Croat, Muslim, and other non-Serb civilian populations.

(iii) Vojvodina, Hrtkovci

548. **ŠEŠELJ**’s crimes in Hrtkovci also formed part of the widespread and systematic attack against a civilian population.¹⁶⁸⁰ **ŠEŠELJ** himself emphasised the connection between, on the one hand, the expulsion of Croats from Hrtkovci and, on the other hand, his vision of a homogenous “Greater Serbia”.¹⁶⁸¹ Large-scale crimes were committed in Hrtkovci. In 1991, the Croat population of Hrtkovci consisted of 1,006 individuals, making up around 40% of the total population of the village.¹⁶⁸² The attack against the Croat inhabitants of Hrtkovci in May-August 1992 led to the

¹⁶⁷⁴ E.g. Kujan, Exh.P00524 (public) (Nevesinje); Karišik, T.8765 (open); [REDACTED] (Mostar). See also VI. C. 2.

¹⁶⁷⁵ See VI. B. 1.

¹⁶⁷⁶ For example, participation of the JNA/VRS, TO and SRS/SCP volunteer groups can be seen in some or all of the attacks on the villages of Lješevo and Svrake and on the area of Grabvica in Novo Sarajevo and in Brčko. VS-1033, T.15762-15763 (open); VS-1035, T.13725 (open).

¹⁶⁷⁷ For example, the creation of Serb Crisis Staff, division of the MUP and arming of Serb populations in the build up to the attacks and the forcible removals, killings and detentions of non-Serbs during and in the aftermath of the attacks.

¹⁶⁷⁸ See above VI. B. 1. (b) (i) ; VI. B. 1. (c) (i) .

¹⁶⁷⁹ See above VI.

¹⁶⁸⁰ Kordić AJ, para.95; Limaj et al TJ, para.187.

¹⁶⁸¹ Exh.P00075, pp.1-7 (public); Exh.P00892 (public); Exh.P00893, pp.21-23 (public).

¹⁶⁸² Exh.P00565, pp.9, 10, 34 (public).

displacement of at least 700-800 Croats, which transformed Hrtkovci into an almost exclusively Serb village.¹⁶⁸³ Croats in Hrtkovci were subjected to systematic discrimination, harassment and violence in May-August 1992.¹⁶⁸⁴ [REDACTED], gave evidence that “threats were coming in every day”.¹⁶⁸⁵ Hand grenades were thrown at Croat houses,¹⁶⁸⁶ dogs were killed,¹⁶⁸⁷ and bomb threats were also frequent.¹⁶⁸⁸ At least one local Croat was killed and his body was mutilated.¹⁶⁸⁹ Serbs pressured local Croats to give up their houses. If Croat owners were away and Serb refugees would simply break in and occupy the houses.¹⁶⁹⁰ In other cases, mobs of armed Serbs would tell the Croat occupants to leave, often threatening them with violence or death if they refused.¹⁶⁹¹ The local police often turned a blind eye to these incidents and told Croats that they were not authorised to help them.¹⁶⁹² This series of organised acts of violence against Croats, which formed part of the overarching attack on the civilian populations, was itself both widespread and systematic. It consisted of numerous crimes against many victims, carried out in an organised manner.

2. The crimes charged for which ŠEŠELJ is liable were part of the widespread or systematic attack directed against the civilian populations

549. The crimes charged and ŠEŠELJ’s acts, including his participation in the forcible displacement and subjugation of Croats, Muslims, and other non-Serbs, form an integral part of the widespread and systematic attack on the civilian populations.¹⁶⁹³ The crimes committed in Croatia, Bosnia, and Serbia set out in the Indictment are all linked to the widespread or systematic attack on the civilian populations in terms of their nature and consequences (committed on an ethnic basis in order to remove non-Serbs and create a Serb-dominated state), in terms of the

¹⁶⁸³ Exh.P00558 (public); Exh.P00565, pp.32-34 (public).

¹⁶⁸⁴ [REDACTED]; Exh.P00555 (public); Exh.P00556 (public); Exh.P00557 (public); Exh.P00559 (public); [REDACTED]; Baričević, T.10632-10638 (open).

¹⁶⁸⁵ [REDACTED].

¹⁶⁸⁶ [REDACTED].

¹⁶⁸⁷ Exh.P00559 (public).

¹⁶⁸⁸ [REDACTED]

¹⁶⁸⁹ Exh.P00557 (public); [REDACTED]; VS-1134, T.10777 (open), [REDACTED].

¹⁶⁹⁰ Ejčić, T.10328 (open); Paulić, T.11897-11898 (open); Baričević, T.10604 (open); [REDACTED].

¹⁶⁹¹ Baričević, T.10626 (open); [REDACTED]; VS-1134, T.10777 (open); Exh.P00559, p.2 (public).

¹⁶⁹² Ejčić, [REDACTED], T.10437-10438, 10535, 10573-10575 (public); Baričević, T.10626 (open); [REDACTED]; VS-1134, T.10786-10787 (open); Paulić, T.11911 (open); Exh.P00559 (public).

¹⁶⁹³ *Kordić* AJ, para.93 (“the acts of an accused”); *Kunarac* AJ, paras.85, 99; *Martić* AJ, paras.302, 313-314, 318; *Mrkšić* AJ, para.41; *Milutinović* TJ, (Vol. 1) para.152; *Brdanin* TJ, para.132 (quoting *D.Tadić* AJ, para.248). See also *Kunarac* AJ, paras.85, 99-101; *Martić* TJ, paras.349, 351.

victims (non-Serbs), in terms of the means and methods used (expulsion, repression, and terrorisation), in terms of the perpetrators (Serbs), and temporally.

550. **ŠEŠELJ**'s position as the head of the SRS/SČP and his statements calling for the expulsion of non-Serb civilians from the areas intended for a Serb-dominated state make it abundantly clear that he knew that there was a widespread and systematic attack on the civilian populations and that the crimes for which he is responsible formed part of that attack.¹⁶⁹⁴ As autocratic leader of the SRS, he was informed of the activities of his **Šešeljevci** and the Serb forces in Croatia and BiH but nonetheless sent them to operate together with other Serb forces to achieve his vision of a "Greater Serbia" through the commission of crimes against non-Serbs.¹⁶⁹⁵ He was aware of the link between the crimes committed in all the Indictment municipalities and the overarching attack on the civilian populations.

(i) Vukovar

551. The Vukovar crimes form an integral part of the attack on the civilian populations as it unfolded in Croatia. **ŠEŠELJ** is responsible for the crimes set out above, which were perpetrated by JNA, TO, and **Šešeljevci** units, and which targeted the same victim groups as the other crimes that formed the attack, i.e. non-Serbs. **ŠEŠELJ** repeatedly confirmed the link between Vukovar and the attack on non-Serb populations, as he spoke of the strategic importance of Vukovar.¹⁶⁹⁶

552. **ŠEŠELJ** knew about the unfolding of the widespread and systematic attack on the civilian populations in Vukovar and he knew that the crimes for which he is responsible formed part of that attack. He was present in Vukovar, and as political leader and public advocate of the forced transfer of thousands of Croats out of the area to achieve the objective of Greater Serbia. As a military organiser whose political party had its own "War Staff", he knew of the connection between the crimes and the broader attack on the civilian populations.¹⁶⁹⁷

(ii) Bosnia

¹⁶⁹⁴ *Milutinović* TJ, (Vol. 1), para.160; *Simić* TJ, para.45; *Kordić* AJ, para.99; *Blaškić* AJ, para.124; *Kunarac* AJ, para.103; *Dragomir Milošević* TJ, para.929.

¹⁶⁹⁵ VS-010, Exh.C00010, pp.7, 9 (public); Exh.P01002, p.1 (public).

¹⁶⁹⁶ Exh.P00298 (public); T.5108-5109 (open); Exh.P00039 (public).

¹⁶⁹⁷ Exh.P00154, p.2 (public); VS-033, T.5510 (open), [REDACTED].

553. The crimes committed in BiH form an integral part of the widespread or systematic attack on the civilian populations, as set out above. **ŠEŠELJ** is responsible for the crimes set out above, which, like the crimes in Croatia were perpetrated by JNA (later VRS), TO, and **Šešeljevi** units, operating together with other paramilitary groups. Again, the same victim group, non-Serbs, was targeted. In Zvornik, “Greater Sarajevo”, Mostar and Nevesinje, Serb forces including JNA (later VRS), TO, MUP, and **Šešeljevi** worked together to achieve the removal of the non-Serb populations through the commission of routine and systematic killings, forcible displacements, torture and cruel treatment, plunder and destruction and other forms of persecution.¹⁶⁹⁸

554. **ŠEŠELJ** knew about the unfolding of the widespread and systematic attack on the civilian populations in BiH and he knew that the crimes for which he is responsible formed part of that attack. As noted above, **ŠEŠELJ**’s public speeches calling for the establishment of an expanded or “Greater” Serbia, and his role in the coordinated mobilization and deployment of volunteers to the Serb Targeted areas throughout BiH demonstrate his knowledge of the nature of the attack. Having extolled the necessity of a Greater Serbia, excluding non-Serbs, **ŠEŠELJ** was well aware of the connection between the crimes that were perpetrated in Bosnia and the wider attack aimed at achieving a Greater Serbia as shown by his stated intentions to forcibly remove non-Serbs from BiH,¹⁶⁹⁹ accompanied by threats of violence.¹⁷⁰⁰

(iii) Hrtkovci

555. **ŠEŠELJ**’s acts, including the crimes for which he is responsible, also form an integral part of the attack on the civilian populations, as set out above, as it unfolded in Vojvodina. **ŠEŠELJ**’s 6 May 1992 speech formed a central part of the widespread or systematic attack that was directed against the civilian population of Hrtkovci in May-August 1992. In his speech, **ŠEŠELJ** denigrated Croats through inflammatory “hate speech”, advocated discrimination and violence against them and explicitly

¹⁶⁹⁸ See V. G. . E.g. VS-1062, T.5962-5964 (open); VS-1013, T.5194 (open); Tot, Exh.P00843, p.8 (public). See also Petković, Exh.C00011, p.19 (public) (explaining that the Šešeljevi commander sent to Mostar was Oliver Barlet [sic]); [REDACTED]; Dabić, T.15161 (open). See also AFIV-188.

¹⁶⁹⁹ Exh.P00034, p.6 (public). See also Exh.P01298 (public); Exh.P01215 (public); Exh.P01222 (public).

¹⁷⁰⁰ Exh.P01180, p.31 (public); Exh.P00034, pp.6-7 (public); Exh.P01263, p.2 (public); Exh.P01186 (public); Exh.P01192 (public); Exh.P01293 (public).

called for their forced expulsion from Hrtkovci.¹⁷⁰¹ This directly caused a number of Croats to leave Hrtkovci and thereby contributed to the displacement of the local Croat population. ŠEŠELJ's 6 May 1992 speech also played a key role in provoking, encouraging and facilitating the attack that was carried out against Croats in Hrtkovci. Considering ŠEŠELJ's reputation, political power and oratorical skills, his speech provided the necessary spark to transform rising ethnic tensions into a coordinated campaign of persecution and forcible displacement directed against local Croats.

556. Following his Hrtkovci speech, ŠEŠELJ continued his televised appearances advocating the expulsion of Croats from towns and villages in Vojvodina, including Hrtkovci, which he claimed were home to "the worst Ustashas".¹⁷⁰² For example, in a radio interview on 12 June 1992, ŠEŠELJ declared that Croats "will have to move out [of Serbia] according to the principles of reciprocity. I mean, since TUĐMAN expelled more than 300,000 Serbs, what are the Croats in Serbia waiting for?"¹⁷⁰³ These speeches provided further encouragement and moral support to the perpetrators of the attack against the Croat population of Hrtkovci. In 2005, ŠEŠELJ acknowledged that there had been an organised "exchange" of population on the basis of "a principle of retortion [...] in response to what the TUĐMAN's regime was doing." According to ŠEŠELJ, the exchange of population "was supposed to be done in a more civilised way than it was actually carried out, but in any case, we [the SRS] are satisfied with the results."¹⁷⁰⁴

557. ŠEŠELJ was also aware of the broader context in which he made his Hrtkovci speech. He frequently emphasised the connection between, on the one hand, the expulsion of Croats from Hrtkovci and, on the other hand, the armed conflict in Croatia and his vision of a homogenous "Greater Serbia". For example, in his speech to the Serbian National Assembly on 1 April 1992, ŠEŠELJ laid out his vision of a "Greater Serbia" stretching from Virovitica to Karlobag, and then stated:

Just two years ago, none of us could have dreamt that we would also, and so quickly, hold the largest parts of Serbian Dalmatia, Lika, Banija, Kordun, Slavonija and Baranja in Serbian hands, and that they would be definitively freed from Ustasha control [...] That means we succeeded [...] In this village, too, in Hrtkovci, in this

¹⁷⁰¹ Ejčić, T.10342 (open); Paulić, T.11905-11907 (open); VS-067, T.15405 (open).

¹⁷⁰² Exh.P01201, pp.12, 20 (public).

¹⁷⁰³ Exh.P01201, p.12 (public).

¹⁷⁰⁴ Šešelji, Exh.P00031, p.1306 (public).

place in Serb Srem, there is no room for Croats. Who are the only Croats for whom there is a room among us? Only those Croats and their families who have shed blood together with us on the frontlines [...] all the rest must clear out of Serbia. Including those from here, from Hrtkovci, who locked up their houses and left, reckoning, I suppose, that they would come back one day, but our message to them is: no, you have nowhere to return to. Serb refugees will move into their houses.¹⁷⁰⁵

558. Long after Croats had fled Hrtkovci, **ŠEŠELJ** unashamedly continued to acknowledge that he intended to instigate, encourage and facilitate their expulsion from Serbia. For example, in a radio interview in November 1993, **ŠEŠELJ** explained the policy that his party had implemented in 1992:

We only interceded for civilized exchange of the citizens with Croatia. For the expatriation of Croats from Serbia so that their houses can take expatriated Serbs from Croatia, and nothing more. And who are the Croats to expatriate? The Croats who were sent there to immigrate by Ante PAVELI] during the Second World War, mostly to Srem, to Hrtkovci, to Slankamen and other places. That process is mainly finished, the biggest part is finished.¹⁷⁰⁶

3. The elements of the specific crimes charged have been met

(a) Article 5(h): Persecution (Count 1)

559. Since the crimes were committed with discriminatory intent,¹⁷⁰⁷ all crimes attributable to **ŠEŠELJ** are acts of persecution.¹⁷⁰⁸ Persecution has been charged to encompass all crimes covered by other counts in the Indictment, in addition to persecutory acts which are not in and of themselves crimes under the Statute. Persecution in the Indictment encompasses the following underlying acts: (a) murder, (b) unlawful imprisonment and confinement, (c) establishment and perpetuation of inhumane conditions, (d) torture, beatings and killings (in detention), (e) forced labour, (f) sexual assaults, (g) imposition of restrictive and discriminatory measures (restrictions of movement, removal from positions of authority in local government

¹⁷⁰⁵ Exh.P00547, p.4 (public).

¹⁷⁰⁶ Exh.P01237, pp.1-2 (public). See also Exh.P01210, p.8 (public); Exh.P01236, pp.3-4 (public).

¹⁷⁰⁷ *Brđanin* TJ, para.996; *Krnjelac* TJ, para.435; *Krnjelac* AJ, para.185; *Milutinović* TJ, (Vol. 1), para.180.

¹⁷⁰⁸ *Kvočka* AJ, paras.320, 323; *Nahimana* AJ, paras.985, 987; *Kordić* AJ, paras.950-951; *Krnjelac* AJ, paras.47, 185; *Brđanin* AJ, paras.296-297. In practice, discrimination on the basis of ethnicity has been accepted as a ground upon which the requirement is satisfied; *Milutinović* TJ, (Vol. 1), para.176, referring to *inter alia* *Kvočka et al.* Appeal Judgement, paras.366, 455.

institutions and the police, dismissal from jobs, denial of medical care, and arbitrary searches of houses), (h) torture, beatings and robbery during and after arrest, (i) deportation or forcible transfer, (j) destruction of property and cultural and religious sites, and (k) hate speech. The underlying acts of persecution that have not been charged under separate counts are descriptive of acts which meet the threshold of crimes against humanity and the case law of the Tribunal shows that these acts may constitute underlying acts of persecution.¹⁷⁰⁹

560. The evidence listed in Annex A proves that Serb Forces and/or ŠEŠELJ deliberately committed the crimes charged in the indictment with discriminatory intent in order to implement the common criminal purpose of forcible removal of non-Serbs from large parts of Croatia, BiH, and Serbia. Systematically, municipality after municipality, non-Serbs were removed from jobs,¹⁷¹⁰ their movements were restricted,¹⁷¹¹ they were forced out of their homes, detained, abused, killed, their homes and cultural monuments were destroyed and extensively looted and other measures were taken so that they would not return.¹⁷¹² Non-Serbs were specifically targeted because of their ethnicity.¹⁷¹³

(i) Hate Speech

561. Throughout Croatia, Bosnia and Vojvodina, ŠEŠELJ engaged in a campaign of persecutory speeches that denigrated non-Serbs, thereby infringing their right to dignity and security.¹⁷¹⁴ ŠEŠELJ undertook this campaign in the midst of escalating ethnic distrust and violence. When considered against this historical backdrop and in

¹⁷⁰⁹ See (i) *Kordić* AJ, para.106 (murder); (ii) *Blaškić* AJ, para.155 (unlawful detention and confinement); (iii) *Kvočka* AJ, paras.325 (harassment, humiliation and psychological abuse), 409, 439 (torture); *Krnjelac* TJ, para.447 (imprisonment); (iv) *Kvočka* AJ, paras.409, 439 (torture); *Simić* TJ, paras.68-69 (interrogations and coerced statements); (v) *Krnjelac* AJ, para.199 (forced labour); (vi) *Milutinović* TJ, (Vol.1), paras.193 (sexual assault), 205 (destruction of religious property); (vii) *Brdanin* AJ, paras.296-297 (denial of rights of movement and employment); *Simić et al.* AJ, para.134 (denial of medical care); *Krajišnik* Trial Judgement, paras.736-741 (arbitrary searches); (viii) *Kvočka* AJ, paras.325 (harassment, humiliation and psychological abuse), 409, 439 (torture); *Blaškić* AJ, paras.147, 148 (theft); (ix) *Popović* TJ, paras.989 (deportation and forcible transfer), 1001; *Simić* TJ, paras.56, 456 (forcible takeover of municipalities); (x) *Blagojević* TJ, para.620 (destruction of private property); *Naletilić* TJ, para.699 (plunder); *Kordić and Čerkez* AJ, para.108 (destruction of real or personal property). See also *Krnjelac* Trial Judgement, paras.111, 115; *Kordić and Čerkez* TJ, paras.292, 301, 302; *Blaškić* AJ, para.149; *Kordić and Čerkez*, AJ, paras.77, 79, 672.

¹⁷¹⁰ E.g. VI. B. 1. (f) .

¹⁷¹¹ E.g. VI. B. 1. (f) ; VI. A. 2. (b) (i) .

¹⁷¹² E.g. VI. A. 2. (e) ; VI. B. 1. (f) ; VI. B. 1. (b) (iii) .

¹⁷¹³ E.g. paras.137, 320, 332, 338, 389, 392, 398, 414, 454, 473 above. See also V. F. and VI.

¹⁷¹⁴ *Nahimana* AJ, paras.985-988, 995, 1078. See also ICTR, *Prosecutor v. Ruggiu*, Case No. ICTR-97-32-I, Sentencing Judgement, 1 June 2000, paras.18-22.

light of **ŠEŠELJ**'s influence and reputation as a political statesman and leader of the SRS/SČP, **ŠEŠELJ**'s hate speeches were like oil to the flame of ever increasing inter-ethnic strife. Hate speech and other acts of persecution reached the level of gravity of other crimes against humanity under Article 5 of the Statute. Hate speeches were thus underlying acts of persecution themselves. As a result, his oratorical persecutory campaign reached the level of gravity of other crimes against humanity in Article 5.

562. At least three of his speeches (two relating to Vukovar and Hrtkovci),¹⁷¹⁵ however, were so vitriolic that they each independently also constitute **ŠEŠELJ**'s physical commission of persecution through hate speech. When considered without reference to other acts of persecution, these hate speeches *in themselves* reached the requisite level of gravity given the context in which they were given. To those in Vukovar who heard **ŠEŠELJ** say that "Not one Ustaša must leave Vukovar alive" and "This entire area will soon be cleared of Ustaša," and to those who heard him urge the bussing of "Ustašas" from Hrtkovci, his message was clear – all Croats were enemies who should fear for their security and would be harmed if they stayed where his volunteers and sympathizers were. **ŠEŠELJ**'s discriminatory intent is evidenced by the inherently hateful, ethnic content of his words and the fact that he explicitly called for discriminatory and violent action against Croats in Vukovar and Hrtkovci.

563. **ŠEŠELJ** denigrated Croats in Vukovar and Hrtkovci by describing them with the offensive, derogatory, and dehumanizing "Ustaša" term. **ŠEŠELJ** used "Ustaša" to associate all Croats with the "Ustašas" from World War II who committed terrible crimes against Serbs. This conduct violated Croats' right to dignity.

564. Each of these three speeches further violated Croats' right to personal security. **ŠEŠELJ** made his Vukovar and Hrtkovci speeches in the midst of extreme tension. The Vukovar speeches were made days before Serb takeover of Vukovar and shortly before violent crimes were committed by Serb forces, including **Šešeljević**. **ŠEŠELJ** gave his Hrtkovci speech while war raged in Croatia and Bosnia and Serb refugees fled to Vojvodina, where tensions were volatile between Serb refugee and local Croats. Hrtkovci Croats felt threatened by **ŠEŠELJ**'s speech. After the speech, inter-ethnic violence did indeed increase and most Croats fled Hrtkovci. The particular

¹⁷¹⁵ The Prosecution is not seeking a conviction for persecution in relation to Zvornik in paragraph 17(k) of the Indictment.

inflammatory context of these speeches rendered them overt calls for expulsion and violence against Croats. These speeches in particular rise to the level of gravity similar to other Article 5 crimes and thus constitute persecution in themselves.

(b) Articles 5(d) and 5(i): Deportation and Forcible Transfer
(Counts 1, 10 and 11)

565. The evidence listed in Annex D shows that Serb leadership knowingly¹⁷¹⁶ organized and executed the forcible displacement¹⁷¹⁷ of non-Serbs from large areas of Croatia, BiH and Serbia and that combined Serb forces, including Šešeljević, carried it out. The forcible transfer and deportation of non-Serbs was part of a widespread or systematic attack directed against the civilian population. The perpetrators intentionally displaced the non-Serb victims from locations where they were lawfully present,¹⁷¹⁸ against the victims' will,¹⁷¹⁹ and without grounds permitted under international law.¹⁷²⁰ Before attacking towns and villages, Serb authorities took discriminatory measures against non-Serbs and created an atmosphere of fear causing many non-Serbs to flee.¹⁷²¹ Those who did not flee the Indictment Municipalities immediately, fled as soon as the first shells started falling, or were systematically expelled from their homes during and after the take-over. They were rounded up, in most cases able-bodied men were separated and detained, and the remaining non-Serb

¹⁷¹⁶ *S. Milošević* Rule 98 bis Decision, 16 June 2004, para.78 ("The Trial Chamber is of the opinion that in relation to forcible transfer or deportation there must be evidence of an intent to transfer the victim from his home or community; it must be established that the perpetrator either directly intended that the victim would leave or that it was reasonably foreseeable that this would occur as a consequence of his action. If, as a matter of fact, the result of the removal of the victim is the crossing of a national border then the crime of deportation is committed; if there is no such crossing, the crime is forcible transfer.") *But see* below for additional element for deportation *mens rea*. *See also* *Popović* TJ, para.905 (referring to the "accused"), citing *Stakić* AJ, paras.278, 307, 317; *Brdanin* AJ, para.206 ("neither the crime of deportation nor the crime of forcible transfer necessitates that the accused's intention must be that of permanent removal.").

¹⁷¹⁷ *Stakić* AJ, paras.278, 317; *Krajišnik* AJ, paras.304, 308, 333; *Popović* TJ, paras.891-892, 889, 904; *Naletilić and Martinović* AJ, para.152.

¹⁷¹⁸ Notably, this element imposes only the lesser requirement of "presence" rather than the more onerous requirement of "residence"; *Popović* TJ, para.900 ("the requirement for lawful presence is intended to exclude only those situations where the individuals are occupying houses or premises unlawfully or illegally and not to impose a requirement for "residency" to be demonstrated as a legal standard").

¹⁷¹⁹ *Krajišnik* AJ, paras.304, 319; *Stakić* AJ, para.279, citing *Krnojelac* AJ, para.229; *Brdanin* TJ, para.543; *Milošević* Decision on Motion for Judgement of Acquittal, paras.60, 73; *Simić* TJ, para.125; *Krnojelac* TJ, para.475, fn.1435; *Milutinović* TJ, para.165; *Simić* TJ, paras.126-128.

¹⁷²⁰ *Popović* TJ, paras.901-903. Commentary to Geneva Convention IV, pp.280-281 (regarding Art. 49), which also notes that evacuation is only permitted when overriding military consideration make it imperative; evacuation ceases to be legitimate if it is not imperative; Commentary to Additional Protocol II, p. 1473 (regarding Art. 17). *See also* *Blagojević and Jokić* Trial Judgement, para.597; *Naletilić* TJ, para.527.

population was forcibly displaced to other locations. Some of the victims were deliberately transferred across borders (deportation)¹⁷²² and some were displaced within Bosnia and Croatia (forcible transfer).¹⁷²³ The imminent threat of direct physical violence created an absence of genuine choice or consent in respect to the non-Serbs' displacement. As to forcible transfer and deportation charged as other inhumane acts in Count 1, paragraph 17(i) of the Indictment, the forcible transfers were of a similar gravity to other enumerated crimes against humanity.¹⁷²⁴ The perpetrators of these crimes acted on a discriminatory basis, targeting the property of non-Serbs because of their ethnicity and after the expulsions they took steps to prevent non-Serbs from returning.¹⁷²⁵

¹⁷²¹ *E.g.* Greater Sarajevo VI. B. 1. (b) (i) ; VI. B. 1. (b) (iii) ; Zvornik:VI. A. 2. (b) ; Nevesinje: VI. C. 3. (a) ; Vukovar: V. F. 1. (c) ..

¹⁷²² *E.g.* Zvornik (VI. A. 2. (b)); Hrtkovci (VI. D. 4.).

¹⁷²³ *E.g.* Vogošća (VI. B. 1. (b) (ii)); Nevesinje (VI. C. 3. (a)).

¹⁷²⁴ *Krajišnik* AJ, paras.330-331; *Milutinović* TJ, paras.170; *see also Kordić* AJ, paras.117.

¹⁷²⁵ *E.g.* VI. B. 1. (f) (steps to prevent return in Greater Sarajevo).

VIII. ŠEŠELJ IS RESPONSIBLE UNDER ARTICLE 7(1) OF THE STATUTE

A. JCE

1. Introduction

The forcible transfer, deportation, persecutions, murder, torture and cruel treatment, destruction and plunder committed throughout the Indictment Municipalities during the Indictment period were the actions of Serb Forces controlled and/or used by JCE members on the basis of a common purpose. Liability under JCE is a form of “commission” under Article 7(1) of the Statute.¹⁷²⁶ As a member of the JCE, ŠEŠELJ is responsible for these crimes.

566. ŠEŠELJ is responsible for the crimes in the Indictment under JCE I. The elements of JCE I are:

- a. a plurality of persons;¹⁷²⁷
- b. the existence of a common design, plan or purpose which amounts to or involves the commission of a crime provided for in the Statute;¹⁷²⁸
- c. the Accused must participate in the common design, plan or purpose involving the perpetration of a crime;¹⁷²⁹ and
- d. shared intent:¹⁷³⁰ the Accused must both intend the commission of the crime¹⁷³¹ and intend to participate in a common plan aimed at its commission.¹⁷³²

¹⁷²⁶ Kvočka AJ, para. 79; Tadić AJ, para. 188, 195-226.

¹⁷²⁷ Milutinović TJ (Vol. 1), para. 97; Brdanin AJ, para. 364; Stakić AJ para. 64; Tadić AJ, para. 227.

¹⁷²⁸ Milutinović TJ (Vol. 1), para. 97; Tadić AJ, para. 227; Stakić AJ, para. 64. *See also* Brdanin AJ, paras. 364, 418; Kvočka AJ, paras. 115-119.

¹⁷²⁹ Milutinović TJ (Vol. 1), para. 97; Brdanin AJ, para. 364; Stakić AJ para. 64; Tadić AJ, para. 227.

¹⁷³⁰ Tadić AJ, para. 227.

¹⁷³¹ Brdanin AJ, para. 365; Vasiljević AJ, paras. 97, 101.

¹⁷³² Brdanin AJ, para. 365; Kvočka AJ, para. 82 (requiring “intent to effect the common purpose”). *See also* Blaškić Appeal Judgement, para. 33.

567. The existence of a plurality of persons¹⁷³³ acting together in the implementation of a common goal has been demonstrated above.¹⁷³⁴ In addition to **ŠEŠELJ**, the other proved JCE members include persons identified at paragraph 8(a) of the Indictment, such as Slobodan MILOŠEVIĆ, General Veljko KADIJEVIĆ, General Blagoje ADŽIĆ, Radmilo BOGDANOVIĆ, Jovica STANIŠIĆ, Franko SIMATOVIĆ, Radovan STOJIČIĆ aka “Badža”, Milan MARTIĆ, Milan BABIĆ, Goran HADŽIĆ, Radovan KARADŽIĆ, Momčilo KRAJIŠNIK, Ratko MLADIĆ, Biljana PLAVŠIĆ and Željko RAŽNATOVIĆ aka Arkan.

568. JCE members did not physically carry out all crimes charged in the Indictment. Rather, they used members and groups of the Serb Forces, including the JNA, VRS, local TO, MUP and paramilitary formations (including **Šešeljevci**) as “tools” to implement the common criminal purpose.¹⁷³⁵

569. For JCE members to be liable for the conduct of “tools”, the tool’s conduct must be imputed to at least one of them.¹⁷³⁶ Members of the Serb Forces perpetrating the crimes alleged in the Indictment were either under the control of a JCE member or closely cooperating with the organisations controlled by a JCE member in implementing the common purpose.¹⁷³⁷ Their acts can thus be imputed to the JCE members.¹⁷³⁸

570. The following perpetrators of the crimes are linked to **ŠEŠELJ** and other members of the JCE¹⁷³⁹:

- **Šešeljevci**: forming part of the hierarchical SRS/SČP structure controlled by **ŠEŠELJ**, who, for example, decided where and when **Šešeljevci** were deployed or redeployed and maintained regular contact with and received reports from them in the field. **Šešeljevci** operated in cooperation with, or under the command of, other Serb Forces and municipal authorities controlled by other JCE members in crime base areas.

¹⁷³³ *Stakić* AJ, paras.64,69 (referring to a plurality of persons that acted together in the implementation of a common goal); *Krajišnik* TJ, paras.884, 1086.

¹⁷³⁴ See sections V. and V. G. .

¹⁷³⁵ *Brdanin*, AJ, para. 413; *Martić*, AJ, para. 168; *Krajišnik*, AJ, para. 225.

¹⁷³⁶ *Brdanin* AJ, para.413.

¹⁷³⁷ See sections V. F. 2. VI. A. 2. ; VI. B. 1. ; VI. C. 2. ; VI. C. 3. .

¹⁷³⁸ See *Martić* AJ, para.195; *Brdanin* AJ, para.410.

¹⁷³⁹ See also section III. .

- JNA: The JNA forces were under the command and control of JCE members Veljko KADIJEVIĆ and Blagoje ADŽIĆ and *de facto* subordinate to JCE member Slobodan MILOŠEVIĆ.¹⁷⁴⁰ During operations other Serb Forces in the operational theatre, such as Serb TOs in Croatia and BiH, **Šešeljevc**, paramilitary formations, including Arkan's Men, and MUP forces were subordinated to the JNA.¹⁷⁴¹
- VRS: VRS forces were part of a hierarchical structure under the command and control of JCE members including Radovan KARADŽIĆ and Ratko MLADIĆ.¹⁷⁴² In BiH from mid-May 1992, during military operations other Serb Forces in the operational theatre, such as Serb TOs, **Šešeljevc**, paramilitary formations, including Arkan's Men, and MUP forces were subordinated to the VRS.¹⁷⁴³
- Members of the local Serb TO in Croatia and BiH: under the control of BABIĆ and KARADŽIĆ¹⁷⁴⁴ respectively, TOs incorporated, worked in close cooperation with or worked under the command of, as applicable, the JNA and VRS, MUP and **Šešeljevc** and in coordination with Serb Crisis Staffs.¹⁷⁴⁵
- DB Serbia forces under the control of STANIŠIĆ and SIMATOVIĆ.¹⁷⁴⁶
- Police from the RS MUP, which was under the command and control of JCE members including Radovan KARADŽIĆ.¹⁷⁴⁷
- Serb Municipal Authorities, including Serb Crisis Staffs and local SDS leaders, in BiH which were under the control of JCE members including KARADŽIĆ.¹⁷⁴⁸

¹⁷⁴⁰ Exh.P00196, pp.3, 83-84 (public); Exh.P00246 (public); Exh.P00926 (public); Theunens, T.3966 (open); Exh.P00247 p.2 (public); Theunens, T.3981 (open); [REDACTED]; Exh.P00183 (public). *See* discussion at Section IV.C.4 in relation to MILOŠEVIĆ's control of the JNA.

¹⁷⁴¹ Exh.P00261, pp.44-45 (general principle of unity of command), p.214 (Croatia), p.216 (Krajina), p.226 (SBWS) (public); Theunens, T.3761 (open); [REDACTED]. *See also* discussion in Section IV.F above.

¹⁷⁴² Theunens, Exh.P00261, pp.260, 278 (public); AFI-187, 189, 193, 197.

¹⁷⁴³ *See* section V.A,B,C. *See also* [REDACTED].

¹⁷⁴⁴ Exh.P01140 (public); Exh.P00410, p.2 (public); Exh.P00871 (public).

¹⁷⁴⁵ AFI-120, 149, 150; [REDACTED]; Exh.P00957 (public); Exh.P00958 (public).

¹⁷⁴⁶ [REDACTED]; Petković, Exh.C00018 para.47 (public); [REDACTED]; Exh.P00644, p.18 (public); Exh.P01016 (public); *See also* Exh.P01251 p.5 (public).

¹⁷⁴⁷ AFI-119, 137, 138, 193.

¹⁷⁴⁸ Exh.P00871 (public); AFI-105, 107.

- Arkan's paramilitaries, under the control of JCE member Arkan. Arkan himself was also closely affiliated with STANIŠIĆ and SIMATOVIĆ.¹⁷⁴⁹

571. In the alternative, members and groups of the Serb Forces, including the JNA, VRS, local TO, MUP and paramilitary formations were also members of the JCE and shared the intent to implement the common purpose.

572. The common purpose, which was shared by ŠEŠELJ and other JCE members, was to permanently and forcibly remove non Serbs from targeted areas in Croatia and Bosnia.¹⁷⁵⁰

573. A common *criminal* purpose is demonstrated, *inter alia*, where crimes are a necessary means of achieving the group's purpose.¹⁷⁵¹ The evidence discussed in Sections IV.F and V.A, B, C above proves beyond reasonable doubt that the common purpose was pursued through the commission of crimes enumerated in Articles 3 and 5 of the Statute.¹⁷⁵² While the core crimes necessary to implementation of the common purpose were forcible transfer, deportation and persecution based on forcible displacement, by the time of the attack on Vukovar and the commission of the first crimes charged in the Indictment, the Serb campaign already clearly also incorporated large-scale ethnic cleansing in the form of wanton destruction, plunder, other forms of persecution, torture and cruel treatment and murder. The pattern of attacks and accompanying criminality, from the first implementation of the common purpose in August 1991 right throughout the Indictment period, evidences beyond reasonable doubt that these criminal means formed part of the common purpose. JCE members accepted the commission of these serious crimes in the implementation of the common purpose and failed to take effective steps to prevent the occurrence (or reoccurrence) of such crimes.

¹⁷⁴⁹ Exh.P00229 p.7 (public); Exh.P00183, p.2 (public); Theunens, T.3759 (open); Exh.P00132 (public); [REDACTED].

¹⁷⁵⁰ E.g. Exh.P00877, para. 39 (public); Exh.P00928 (public) (SDS Party Council minutes from 19 October 1991); Exh.P00966 (public) (Six Strategic Objectives of the Serbian People).

¹⁷⁵¹ *Krajišnik* AJ, para.188 ("The Chamber finds that the crimes of deportation and forced transfer (as charged under counts 7 and 8 of the indictment and as incorporated in the charge of persecution in count 3) were necessary means of implementing the common objective of removal by force of Bosnian Muslims and Bosnian Croats from large areas of Bosnia-Herzegovina.")

¹⁷⁵² The Trial Chamber in the *Krajišnik* case has found, in relation to the JCE and its operation in Bosnia and Herzegovina, that the Bosnian Serb leadership wanted to ethnically recompose the territories under its control by expelling and thereby drastically reducing the proportion of Bosnian Muslims and Bosnian Croats living there. *Krajišnik* TJ, para.1090.

574. Several witnesses described both the plan to forcibly expel non-Serbs¹⁷⁵³ and specifically the massive crimes committed to further that goal. Similar descriptions of the consequences of the Serb campaign in Croatia and BiH were given by JCE member BABIĆ,¹⁷⁵⁴ [REDACTED],¹⁷⁵⁵ the neutral ECMM,¹⁷⁵⁶ Helsinki Watch,¹⁷⁵⁷ the Special Rapporteur to the UN Commission on Human Rights,¹⁷⁵⁸ ŠEŠELJ's own magazine Greater Serbia,¹⁷⁵⁹ as well as the numerous victims of the criminal campaign.¹⁷⁶⁰

575. The implementation of the common purpose necessarily required the combined efforts of a number of Serb military, police, and political actors all directed towards the common goal. Members of the JCE admitted on more than one occasion that not only their goal was common but also that the results could not have been achieved without the participation of others.¹⁷⁶¹

576. Considered in its totality, the evidence establishes beyond a reasonable doubt that ŠEŠELJ and the other JCE members shared the common purpose from no later than August 1991. Detailed discussion of the development of the common purpose throughout 1990 and 1991 is contained in Section IV. above. These developments included:

- escalating divisive nationalist sentiment based on propaganda, of which ŠEŠELJ and his SRS/SČP party were among the most radical disseminators;
- the unity of Serb nationalist parties, in particular the SRS and SDS;
- the pursuit of ethnic separation through the creation of separate Serb political and military structures, and the common pattern in the creation of such

¹⁷⁵³ E.g. Exh.P00877, para. 65 (public).

¹⁷⁵⁴ Babić, Exh.P01137 p.99, p.104 (public).

¹⁷⁵⁵ [REDACTED]. See also AFIV-322.

¹⁷⁵⁶ Exh.P00412 p.13 (public).

¹⁷⁵⁷ Exh.P00183 (public).

¹⁷⁵⁸ Exh.P00982 (public).

¹⁷⁵⁹ Exh.P01291 p.1 (public).

¹⁷⁶⁰ See crime base discussions at Sections IV.F, V.A, B, C.

¹⁷⁶¹ E.g. Exh.P01187 p.1 (public) (ŠEŠELJ says "We trust the Army now, because the Army had demonstrated in action that it fights for the defence of the Serbian people and territories, of our western borders. It co-operates with all our people and without this co-operation neither one of us would have shown the results achieved so far."); Exh.P01010 (public), (Shorthand minutes of the 5th Session of the (FRY) Supreme Defence Council, 07 August 1992, it is admitted "we needed these paramilitary formations for a while"), p.5; Exh.P01249 (public) ("Without our support and that of the Socialist Party of Serbia I do not believe the Serbs of Republika Srpska and the Republic of Serbian

structures, including Crisis Staffs, MUP and TO forces, each as co-ordinated preparatory steps for seizing and securing claimed territories;¹⁷⁶²

- large-scale arming of the Serb population;
- the creation of Serb forces independent from the multi-ethnic SFRY government, as publicly called for by MILOŠEVIĆ in March 1991;
- the creation by MUP Serbia of its own force, which armed and incorporated paramilitaries including cooperating with ŠEŠELJ and his SRS War Staff;
- the enveloping of the JNA under the *de facto* control of Belgrade-based JCE members from summer 1991, accompanied by representations by ŠEŠELJ and other Serb leaders as to the increasing alignment of the JNA to Serb interests; and
- the role played by the JNA in the systematic arming of Serb volunteers, the military support provided by the JNA in the course of the attacks by Serb forces on towns and villages.

577. As discussed in Section II, IV.E, IV.G above, the same patterns of arming, creation of ethnically separate Serb structures and forces and cooperation between Serb Forces were replicated in BiH under the leadership of many of the same JCE members.

578. The existence of the common purpose encompassing the commission of the charged crimes among the JCE members throughout the Indictment period is demonstrated from the pattern of deployment of Šešeljevi by ŠEŠELJ and the SRS War Staff in coordination with, and often at the request of, other JCE members. Similarly, the common purpose is evidenced by the continuous close military co-operation between members of the JCE and/or forces under their influence or control in implementation of the common purpose in the field. As discussed in Sections V. F. VI. A. VI. B. and VI. C. 1. this included cooperation between ŠEŠELJ and the Šešeljevi and the JNA, VRS, MUP Serbia, and local Serb TOs and police forces.

Krajina would have succeeded in their struggle to attain their own states, their own territories and the right to self-determination”).

¹⁷⁶² See above IV.B, IV.C, IV.G.3, IV.G.6. See also Exh.P01294, p.1 (public) (the SRS called on Serbs in BiH to “form their own state authorities”).

579. Implementation of the common purpose necessarily required the combined efforts of a number of Serb military, police, and political actors all directed towards the common goal. JCE members admitted on more than one occasion that the results attained in implementation of the common purpose could not have been achieved without such joint participation.¹⁷⁶³

580. The evidence set out in Sections IV. V. VI. above shows that **ŠEŠELJ** participated in the common purpose and that his participation significantly contributed to its implementation. An accused's participation in the JCE need not involve the commission of a specific crime.¹⁷⁶⁴ Consequently, while **ŠEŠELJ**'s physical perpetration of crimes, as discussed at section below, constitute a contribution to the common purpose, his other contributions are equally and independently sufficient grounds upon which the Trial Chamber can find that he significantly contributed to the common purpose. These contributions include that:

- **ŠEŠELJ** helped establish, organise, motivate, and assist Chetnik organisations in Croatia and BiH.
- **ŠEŠELJ** participated in the recruitment, formation, financing, supply, support and direction of the **Šešeljevci** that participated in implementation of the common purpose, including the crimes for which **ŠEŠELJ** is charged in Croatia and BiH. Many of the **Šešeljevci** units established, recruited and organized by **ŠEŠELJ** participated both during 1991 in combat operations to seize and cleanse Croat areas, and in 1992 to seize and cleanse Bosnian Muslim areas. The **Šešeljevci** were deployed to strategically vital and difficult

¹⁷⁶³ E.g. Exh.P01187 p.1 (public) (**ŠEŠELJ** says "We trust the Army now, because the Army had demonstrated in action that it fights for the defence of the Serbian people, Serbian territories, our western borders. The Army coordinates its activities with all our men and without our joint efforts neither we nor they would demonstrate results that are being achieved."); Exh.P01010, p.5 (public) (Shorthand minutes of the 5th Session of the (FRY) Supreme Defence Council, 07 August 1992, it is admitted "there was a point, we needed those paramilitary groups"); Exh.P01249, p.2 (public) ("The result of our cooperation and joint effort was the creation of Republika Srpska and the Republic of Serbian Krajina. Without our support and that of the Socialist Party of Serbia I do not believe the Serbs of Republika Srpska and the Republic of Serbian Krajina would have succeeded in their struggle to attain their own countries, their own territories and the right to self-determination").

¹⁷⁶⁴ *Milutinović* TJ (Vol. 1), para. 103; *Babić* AJ, para. 38; *Krajišnik* AJ, paras. 215, 695; *Krnojelac* AJ, paras. 31 and 81; *Kvočka* AJ, para. 99; *Ntakirutimana* AJ, para. 466; *Tadić* AJ, para. 227(iii); *Vasiljević* AJ, para. 100.

areas and other JCE members, suffering manpower shortages, specifically sought out **ŠEŠELJ**'s support.¹⁷⁶⁵

- The scope of **ŠEŠELJ**'s volunteer recruitment and deployment was vast, not only in terms of the significant numbers of volunteers mobilized to the frontline or the geographic area they covered, but also in terms of their widespread notoriety for brutality against non-Serbs. Although it was not the subject of his expert report, Witness Theunens was asked by the Trial Chamber to estimate the number of **ŠEŠELJ**'s volunteers; he guessed there may have been 1,000.¹⁷⁶⁶ Other evidence shows that the number was certainly much higher. **ŠEŠELJ** himself has put the number as high as almost 30,000¹⁷⁶⁷ and admitted that he contributed around 10,000 volunteers to the common purpose in BiH alone.¹⁷⁶⁸ Witness PETKOVIĆ, the Chief of the SRS War Staff, recounted that, as early as May 1991 (around the time of the Borovo Selo murders in Croatia), there were already 15,000 "Chetniks" in **ŠEŠELJ**'s ranks.¹⁷⁶⁹ Witness PETKOVIĆ personally assigned approximately 500 volunteers to Okučani and Western Slavonia¹⁷⁷⁰ and witness RANKIĆ accompanied about 1,000 further **Šešeljevci** to the same region.¹⁷⁷¹ Between January and July 1992 more than 6,000 volunteers were stationed and trained at 4 July Barracks in Belgrade before being deployed to the front.¹⁷⁷² Vojvoda Branislav GAVRILOVIĆ aka "Brne" established volunteer training centres through which at least 1,500 **Šešeljevci** passed during the course of the war.¹⁷⁷³ The only reasonable inference is that **ŠEŠELJ** made a very significant contribution of thousands of **Šešeljevci** to the implementation of the common purpose.
- **ŠEŠELJ** consistently publicly acknowledged the presence of **Šešeljevci** at frontlines throughout the region, particularly noting their presence at key

¹⁷⁶⁵ E.g. Exh.P00987, p.20 (public) (Plavšić admitted to having requested manpower from **ŠEŠELJ**, Arkan and Mirko JOVIĆ).

¹⁷⁶⁶ Theunens, T.3909 (open).

¹⁷⁶⁷ Exh.P00342 (public).

¹⁷⁶⁸ Dražilović, Exh.C00010, p.12 (public).

¹⁷⁶⁹ Exh.P01275, p.2 (public).

¹⁷⁷⁰ Exh.C00011, p.12 (public).

¹⁷⁷¹ Exh.P01074, para.57 (public).

¹⁷⁷² Exh.P00054, p. 2 (public).

¹⁷⁷³ Exh.P01000, p.3 (public).

locations where conditions were toughest.¹⁷⁷⁴ He also acknowledged that he had significant political influence and that “several thousand Serbian Volunteers listen” to him.¹⁷⁷⁵ **ŠEŠELJ** estimated that during the war the SRS had influence over one third of Serbian public opinion in RS, in 1994 he said “the Serbian Radical Party has spread over all areas in Republika Srpska and it has great influence among the people, the people have great confidence in it.”¹⁷⁷⁶

- Tellingly, **ŠEŠELJ** described the SRS as “not one of those parties which held more press conferences than they fired bullets on the battlefield”.¹⁷⁷⁷
- **ŠEŠELJ** used his power and influence to provide political support to other JCE members, for example, directing members of the SRS/SČP to join and cooperate with Slobodan MILOŠEVIĆ, Milan BABIĆ, Radovan KARADŽIĆ’s SDS and others, in pursuit of the common purpose.
- **ŠEŠELJ**’s inflammatory statements concerning the forceful formation of a Greater Serbia covering large portions of Croatia and BiH encouraged members of the JCE and their tools to commit crimes against non-Serbs. This aspect of **ŠEŠELJ**’s contribution is discussed in detail in Section above and in the context of instigation below.
- **ŠEŠELJ** traveled around Serb communities in Croatia and BiH holding rallies, giving press interviews and stoking the flames of fear and hatred. **ŠEŠELJ** himself visited the frontlines to bolster the morale of the Serb forces which implemented the common purpose in Croatia and BiH.
- **ŠEŠELJ**, and his unit commanders, met and co-ordinated with Serb military and political leaders in Croatia and BiH in respect of the implementation of the common purpose. For example, as discussed above, **ŠEŠELJ** quickly established contacts with KARADŽIĆ and the SDS, and cooperated with Serbian leaders in deploying outside forces to implement the common purpose in BiH. He whole-heartedly supported their efforts to unite the Serb areas of

¹⁷⁷⁴ E.g. Exh.P01221, pp.2-3 (public).

¹⁷⁷⁵ Exh.P01220, p.2 (public).

¹⁷⁷⁶ Exh.P01248, p.6 (public).

¹⁷⁷⁷ Exh.P01185, p.3 (public). See also Exh.P01186, p.7 (public) (“the Serb people trust us. There is no discrepancy whatsoever between what we say and what we do”).

the former Yugoslavia into a single Serb state. The most emblematic manifestation of that support was his magazine, *Greater Serbia*, and its constant public reminder of his territorial vision.

581. **ŠEŠELJ** shared the intent for the commission of the crimes alleged in the Indictment and to participate in the common plan which encompassed them.

582. From the earliest stages of the conflict, **ŠEŠELJ** was an active proponent of ethnic separation. He had begun advocating for Greater Serbia before 1990, and in June 1990 created his Serbian Chetnik Movement to prepare to fight a war in Croatia.¹⁷⁷⁸

583. **ŠEŠELJ**'s desire for Greater Serbia entailed the removal of the non-Serb population from targeted areas. For instance, when it was pointed out that his Greater Serbia would include towns such as Osijek in SAO SBWS, where Croats had been a majority, **ŠEŠELJ** stated that he did not care if Serbs had not been a majority and that Osijek had become part of Serbian territory. He rejoiced that almost 100,000 Croats had fled Osijek, adding "they have nowhere to return to. Osijek remains a Serbian town."¹⁷⁷⁹

584. **ŠEŠELJ** accompanied his calls for the expulsion of non-Serbs with threats of violence, calls for revenge,¹⁷⁸⁰ and suggestions that Europe would not come to BiH's aid in the event of bloodshed.¹⁷⁸¹ He spoke of BiH "bath(ing) in rivers of blood"¹⁷⁸² and of "blind" revenge, stating "innocent Croats will suffer."¹⁷⁸³ Even after the Indictment period, he continued to call on his followers to "finish them off," meaning non-Serbs living within his "Greater Serbia."¹⁷⁸⁴

585. **ŠEŠELJ**'s intent for the violent crimes and expulsion of non-Serb populations from the targeted areas in Croatia and BiH is apparent not only from his statements but also from his actions, as shown by his continued participating in the implementation of the common purpose knowing that it encompassed the commission

¹⁷⁷⁸ Exh.P00644 p.5 (public).

¹⁷⁷⁹ Exh.P01186, p.6 (public).

¹⁷⁸⁰ E.g. Exh.P01003 (public); Exh.P00355 (public); Exh.P00014 (public).

¹⁷⁸¹ Exh.P01180, p.31 (public) (threatening "terrible" Serbian revenge against the Bosnian Muslims and their children if they support the Croats); Exh.P00034, pp.6-7 (public) (threatening that the Serbs are ready for war and that the Europeans will not come to the Bosnian Muslims aid).

¹⁷⁸² Exh.P00395 (public).

¹⁷⁸³ Exh.P00350 (public).

¹⁷⁸⁴ Exh.P00018 (public).

of such crimes. **ŠEŠELJ** was aware of the activities of the Serb Forces in Croatia and BiH, and particularly those of his volunteers deployed there.¹⁷⁸⁵ These activities included killing members of the civilian population. His knowing and voluntary contribution to the implementation of the common purpose, including providing volunteers to the Serb forces operating in Croatia and BiH, his assistance in establishing Serb structures in Croatia and BiH to carry out the JCE aims, and his cooperation with other JCE members operating in Croatia and BiH, demonstrate that he shared the common criminal purpose.

586. Similarly, it is clear from **ŠEŠELJ**'s actions that he not only intended but also advocated destruction of non-Serb cultural and other property. For example, **ŠEŠELJ** participated in, and subsequently boasted of, the destruction by SČP members of a Macedonian plaque at the monastery of Prohor Pčinjski.¹⁷⁸⁶ In addition, **ŠEŠELJ**'s magazine "Western Serbia" published cartoons depicting the destruction of Muslim religious property, in a manner clearly symbolic of the expulsion of the people as a whole.¹⁷⁸⁷

587. In the alternative to liability under JCE I for all crimes charged in the Indictment, **ŠEŠELJ** is liable for each of the crimes other than deportation, forcible transfer and persecutions based on forced displacement under JCE III. The common purpose to forcibly displace the non-Serb population necessitated at least the commission of deportation, forcible transfer and persecutions based on forced displacement. It was foreseeable that acts of persecution (other than forced displacement), murder, torture, cruel treatment, plunder and wanton destruction might be committed in the implementation of the common purpose to forcibly displace the non-Serb population. **ŠEŠELJ** was aware that these other crimes were possible consequences of the implementation of the JCE to create an ethnically pure "Greater Serbia" and willingly participated in the JCE.¹⁷⁸⁸ As noted above, **ŠEŠELJ** foresaw many of the crimes during the conflict. He acknowledged that "innocent people get

¹⁷⁸⁵ Dražilović, Exh.C00010, para.27 (public) ("All members of the Crisis Staff were subordinated to **ŠEŠELJ**. He was informed about the activities of SRS members on the front and his approval was necessary for every decision."); Rankić, Exh.P01074, para.39 (public).

¹⁷⁸⁶ Exh.P01263 pp.1-2 (public).

¹⁷⁸⁷ Exh.P01309, BCS p.2 (public) (mosques being swept away from before a large Orthodox church); Exh.P01316 (public) (a mosque with a shelled minaret and the caption "*the castration of Islam*").

¹⁷⁸⁸ Šešelj, Exh.P00031, p.1243 (public).

killed during revenge,”¹⁷⁸⁹ and nonetheless encouraged Serbs to avenge present and past attacks against them.¹⁷⁹⁰ He was informed of the ill-discipline of his **Šešeljević**.¹⁷⁹¹ As autocratic leader of the SRS/ŠČP, he was informed of the activities of his volunteers and the Serb forces in Croatia and BiH, but nonetheless sent them there, where they committed crimes. It was further foreseeable to **ŠEŠELJ** that murder would be committed as part of the campaign of forcible transfer, deportation and persecutions based on forced displacement.¹⁷⁹² **ŠEŠELJ** was aware that Serb Forces would commit those crimes due to ethnic animosity and thus was aware that they might commit persecutions.

B. Physical Commission

588. Through his hate speeches, **ŠEŠELJ** physically committed persecution in Šid, Vukovar and Hrtkovci. He also physically committed deportation and forcible transfer in Hrtkovci.¹⁷⁹³

C. Instigating

589. **ŠEŠELJ** instigated the direct perpetrators to commit the charged crimes in four primary ways:¹⁷⁹⁴

- (i) by using inflammatory and denigrating propaganda against non-Serbs in his speeches, publications and public appearances;¹⁷⁹⁵
- (ii) by travelling to the frontlines to visit and encourage Serb Forces, including **Šešeljević**, in the fight against non-Serbs;¹⁷⁹⁶
- (iii) by dispatching high-ranking SRS/ŠČP members or commanders to spread his message of hate, revenge and ethnic cleansing;¹⁷⁹⁷ and

¹⁷⁸⁹ Exh.P01339, p.5 (public).

¹⁷⁹⁰ See sections IV. E. and VIII. C.

¹⁷⁹¹ E.g. [REDACTED]; Rankić, Exh.P01074, para.39 (public); VS-033, T.5526, (open), [REDACTED].

¹⁷⁹² See *Tadić* AJ, para. 204.

¹⁷⁹³ See VI. D. 4.

¹⁷⁹⁴ *Kordić* AJ, para.27.

¹⁷⁹⁵ See IV. E.

¹⁷⁹⁶ Rankić, Exh.P01074, paras 64-76 (public); Stojanović, Exh.P00528, paras.30-32 (public); Dražilović, Exh.C00010, para.37 (public); [REDACTED]; Šešelj, Exh.P00031, p.603 (public); Exh.P01181, p.19 (public); Exh.P01207, pp.9-10 (public); [REDACTED]; Exh.P01204 (public).

(iv) by failing to act against **Šešeljevi** who participated in crimes against non-Serbs.¹⁷⁹⁸

590. **ŠEŠELJ**'s instigation substantially contributed to the crimes charged in the indictment.

591. **ŠEŠELJ** understood the power of his propaganda: "Words can be a very dangerous weapon. Sometimes they can pound like a howitzer."¹⁷⁹⁹ Relentlessly preying on the anxiety and fear of his audience, **ŠEŠELJ**'s threat messages were his most effective propaganda tool in encouraging violent action to remove the perceived threat.¹⁸⁰⁰ **ŠEŠELJ** expertly used powerful propaganda techniques such as using non-Serbs as a "threat stimulus".¹⁸⁰¹

592. In his speeches, **ŠEŠELJ** used old symbols and evoked past war traumas suffered by both groups to stoke fear and hatred amongst them. **ŠEŠELJ**'s propaganda campaign helped condition Serbs to accept that non-Serbs were enemies and to justify using force against them. **ŠEŠELJ**'s campaign created a coercive environment where non-Serbs felt compelled to flee from their homeland. With the insecurity caused by the disintegration of Yugoslavia, **ŠEŠELJ** harnessed the forces of nationalism, hatred, and fear to advance his vision of ethnically pure Serb territory encompassing Serbia and parts of Croatia and BiH. Empowered by his alliance with other Serb leaders, **ŠEŠELJ** participated in creating conditions for committing the charged crimes and encouraged and provided moral support to the perpetrators.

593. As the undisputed and revered leader of the SRS and SČP, **ŠEŠELJ** exercised ideological and moral authority over the **Šešeljevi** sent to the front by his politico-military organization. **ŠEŠELJ**'s political prominence allowed him to address thousands in rallies, tour the front, appear on television, be quoted in newspapers and be recognized as an equal by high-level military and political figures. **ŠEŠELJ**'s

¹⁷⁹⁷ E.g. Exh.P00635 (public); Dražilović, Exh.C00010, para.41 (public) (Mirkovči in September 1991); Rankić, Exh.P01074, para 57-61, 64-72, 85 (public); Petković, Exh.C00012, para.24 (public) (visit to Erdut between July & Sept 1991).

¹⁷⁹⁸ See VI. A. 2. (a) .

¹⁷⁹⁹ Exh.P01215, p.6 (public).

¹⁸⁰⁰ See Oberschall, Exh.P00005, p.13 (public).

¹⁸⁰¹ Oberschall, T.1974 (open).

nationalistic pro-Serb propaganda held resonance with Serb nationalists and sympathisers and he knew that his words would be heeded.

594. The Trial Chamber has viewed videos of crowds responding to **ŠEŠELJ**'s charismatic and inflammatory propaganda.¹⁸⁰² **ŠEŠELJ** used all available media resources - television, radio, newspapers and monthly periodicals (including the SRS newspapers *Velika Srbija* and *Zapadna Srbija*) and personal appearances to disseminate denigrating, hateful and violent speech about non-Serbs.¹⁸⁰³ He inspired and instigated violence through his use of brutal, vulgar language and boasting about acts of vandalism and violence committed by him and those members of the Serb forces who perpetrated the crimes charged in the indictment.¹⁸⁰⁴

595. **ŠEŠELJ**'s intent to instigate the commission of these crimes is supported by **ŠEŠELJ**'s increase in the tone of his inflammatory language coinciding with the escalation of violence against non-Serbs. In March 1992, the month before Serb take-overs in BiH, in which **Šešeljevi** participated, **ŠEŠELJ** used violent language to prepare the ground for discriminatory violence against non-Serbs. He used a press conference in Belgrade to threaten and intimidate Bosnian Muslims. If Bosnian Muslims rejected Serb territorial ultimatums, he promised "bloodshed", a "bloody civil war", and "rivers of blood" flowing in BiH. Characterizing those who favored BiH independence as "Islamic fundamentalists", he used the word "Chetnik" to evoke, among other things, the mass murders of Muslims by the Chetniks in WWII.¹⁸⁰⁵ The volunteers sent to BiH were imbued with his violent extremism and included those known to have participated in crimes in Croatia.¹⁸⁰⁶

596. On 26 March 1992 - a few days before the attack on Bijeljina – **ŠEŠELJ** held a press conference to publicly threaten "a bloodshed of wider proportions" in BiH if the "Muslim fundamentalists" refused "not to play with fire" and "to leave alone

¹⁸⁰² E.g. Exh.P00018 (public); Exh.P00070 (public); Exh.P00179 (public); Exh.P00339 (public); Exh.P01003 (public).

¹⁸⁰³ Exh.P01269 (public). E.g. *Velika Srbija*: Exhs.P01280 (public), P00937 (public), P01289 (public), P01290 (public). Radio interviews: Exhs.P01189 (public), P01190 (public), P01204 (public), P01215 (public), P01216 (public), P01227 (public). Television interviews: Exhs.P01185 (public), P01193 (public), P01297 (public), P01194 (public), P01195 (public), P01201 (public), P01205 (public), P01207 (public), P01226 (public).

¹⁸⁰⁴ Exh.P01263 p.19 (public); Exh.P01172 (public); Exh.P01177, pp.6-7,10 (public); Exh.P01258 (public); Exh.P01260, pp.12,42 (public); Exh.P01186, pp.5-7,10 (public); Exh.P01189, p.28 (public); Exh.P01298, p.2 (public); Exh.P01220, p.3 (public); Exh.P01222, p.7 (public).

¹⁸⁰⁵ Exh.P01324 (public).

what's not theirs".¹⁸⁰⁷ A few days before crimes were committed against non-Serbs in Eastern Herzegovina and elsewhere, **ŠEŠELJ** used his popularity and notoriety to promote unification of all Serb lands and to create a climate of ethnic fear and hatred, which prepared the ground for the discriminatory crimes alleged. For example, in front of a large, publicized rally in Serbia, **ŠEŠELJ**, accompanied by Nikola POPLAŠEN (President of the SRS BiH) promoted cleansing the Drina side of BiH. He proclaimed: the "only thing left in Bosnia and Herzegovina is to clean up the left bank of the Drina, secure the corridor between the Bosnian Krajina and Semberija and liberate the Serbian part of Sarajevo. Everything else is in our hands already".¹⁸⁰⁸

597. **ŠEŠELJ** knew his public speeches and words instigated violent action to the average listener. **ŠEŠELJ's** audience, however, was not average; they were committed nationalist Serbs, including the **Šešeljevci** whom he had recruited and sent to fight for an ethnically pure Serb territory. While **ŠEŠELJ** intended to provoke violent action by whomever his words inspired, he understood the substantial likelihood that crimes would be committed as a consequence of delivering his message to nationalist Serbs, including **Šešeljevci**.¹⁸⁰⁹ **ŠEŠELJ** instigated his listeners to seek revenge¹⁸¹⁰ and understood that "innocent people get killed during revenge".¹⁸¹¹

598. **ŠEŠELJ's** speeches and other acts promoting an ethnically Serb territory through violence substantially contributed to the crimes committed by his **Šešeljevci** volunteers, his sympathizers and other members of the Serb Forces. He denigrated and debased Croats, Muslims and other non-Serbs to countenance their destruction. His use of historically-charged and polarising terms such as "Ustaša", "Shiptars" and "Pan-Islamists," promoted contempt and hatred for non-Serbs and was meant to instigate violence against them.

¹⁸⁰⁶ See V. G. 7.

¹⁸⁰⁷ Exh.P01298 (public).

¹⁸⁰⁸ Exh.P01200, p.3 (public).

¹⁸⁰⁹ *Kordić* AJ, paras.29, 32. Exh.P01207. pp.9-10 (public); Exh.P01192 (public); Exh.P01204 (public); Exh.P01299 (public).

¹⁸¹⁰ Exh.P01003, p.1 (public).

¹⁸¹¹ Exh.P01339, p.5 (public).

599. **ŠEŠELJ** referred to all Muslims who did not want to accept imposition of a Greater Serbia as “Muslim fundamentalists,” who had to be removed from Serb-claimed territories. In Mali Zvornik, **ŠEŠELJ** announced that he and his supporters would “spill new rivers of blood, if necessary.”¹⁸¹² **ŠEŠELJ** added that if any “Muslim fundamentalists” did not like that he was claiming the land for the Serbs, “they will have to pack their suitcases and leave.”¹⁸¹³ The violent actions which he intended his followers to use to make non-Serbs leave the targeted areas was not left to the imagination when **ŠEŠELJ** added “[w]hile the Serbs are well-disposed towards you, you can walk. Afterwards, you will not be able to.”¹⁸¹⁴

600. In Vukovar, after **ŠEŠELJ** told members of the Serb forces, including direct perpetrators of the subsequent massacre at Ovčara, that “No Ustaša should leave Vukovar alive”, the Serb forces raised their rifles in approval followed by responsive chants about slaughtering Croats and the firing of guns.¹⁸¹⁵ Soon after this rally, **Šešeljevi** and other members of the Serb forces committed atrocities throughout Vukovar and at Velepomet and Ovčara. The **Šešeljevi** committed the very crimes **ŠEŠELJ**’s words and actions directed. **ŠEŠELJ**, through his words and conduct, instigated the crimes.

601. In Hrtkovci, **ŠEŠELJ**’s speech was greeted with applause and responsive chants which prompted shouts of “Ustaša out” and “this is Serbia”.¹⁸¹⁶ To those who viewed **ŠEŠELJ** as godlike, his words confirmed and strengthened their Chetnik ideology¹⁸¹⁷ and instigated them to commit the crimes with which **ŠEŠELJ** is charged. Following **ŠEŠELJ**’s divisive and threatening speech, the residents of Hrtkovci area began a mass exodus believing they had no viable choice but to leave or be killed.¹⁸¹⁸ Local Serbs and those affiliated with **ŠEŠELJ** supported the exodus by harassing and threatening the non-Serb residents.¹⁸¹⁹

¹⁸¹² Exh.P01263, p.15 (public).

¹⁸¹³ Exh.P00034, p.6 (public) (stating that the Bosnian Muslim population would have to leave Bosnia unless they accepted being incorporated into Serbia).

¹⁸¹⁴ Exh.P00037, p.4 (public).

¹⁸¹⁵ See section V. F. 1. (d) .

¹⁸¹⁶ Ejčić, T.10343 (open), [REDACTED]; Baričević, T.10621 (open).

¹⁸¹⁷ See section V. F. 1. (d)

¹⁸¹⁸ See section VI. D. 4.

¹⁸¹⁹ See section VI. D. 4. (a)

602. **ŠEŠELJ** is responsible under Article 7(1) of the Statute for having instigated the crimes charged in the Indictment.

D. Aiding and abetting

603. As well as instigating the indicted crimes, **ŠEŠELJ** also aided and abetted them. First, as just discussed, **ŠEŠELJ**'s propaganda substantially contributed to the commission of the indicted crimes by encouraging and morally supporting their perpetration. **ŠEŠELJ** had knowledge of this—he even intended it. In addition, **ŠEŠELJ** also aided and abetted the indicted crimes by recruiting and deploying volunteers to commit them. Again, **ŠEŠELJ** knew (and intended) that this would aid and assist the commission of crimes. For all these reasons, he should be held liable under Article 7(1) as an aider and abettor.

1. ŠEŠELJ's conduct fulfils the *actus reus* of aiding and abetting

604. Although not necessary elements of aiding and abetting as a matter of law, **ŠEŠELJ**'s specific links with and authority over **Šešeljević**, as discussed above in the context of instigation, are relevant contextual considerations in assessing the significance of **ŠEŠELJ**'s assistance in the commission of the crimes.¹⁸²⁰

605. As the evidence has proven beyond a reasonable doubt, **ŠEŠELJ** did in fact provide assistance, encouragement and/or moral support which had a substantial effect on the commission of the crimes in each of the crime bases,¹⁸²¹ before, during and after their commission.¹⁸²² The voluminous evidence of both **ŠEŠELJ**'s significant contribution to the common purpose of the JCE and his substantial contribution to the crimes by way of instigation, already establish the necessary *actus reus* elements for his liability under aiding and abetting and should also be considered in this light. The fact that throughout the crime bases many perpetrators specifically identified themselves as **Šešeljević** further evidences the substantial effect **ŠEŠELJ**'s acts did have on their criminal conduct. Although **ŠEŠELJ**'s assistance and support frequently included visiting the frontlines where the crimes were occurring, his

¹⁸²⁰ *Blagojević and Jokić* AJ, para. 195.

¹⁸²¹ *Seromba* AJ, para. 44; *Nahimana et al.* AJ, para. 482; *Blagojević and Jokić* AJ, para. 127; *Ntagerura et al.* AJ, para. 370; *Ntakirutimana and Ntakirutimana* AJ, para. 530; *Blaškić* AJ, para. 45; *Vasiljević* AJ, para. 102.

activities in other locations, such as directing the SRS War Staff in Belgrade, may also be considered.¹⁸²³

606. **ŠEŠELJ** is therefore responsible under Article 7(1) of the Statute for aiding and abetting the crimes charged in the Indictment in which his **Šešeljevci** participated. In particular, examples of **ŠEŠELJ**'s conduct which satisfy the *actus reus* for aiding and abetting in each of the crime bases include:

- **ŠEŠELJ**'s persecutory speech throughout the Indictment period which advocated force, repeatedly impressed the need for ethnic separation and sought to justify and legitimise the crimes being committed (as discussed at above). This constituted moral support and endorsement of crimes already committed and encouragement for further criminality;
- **ŠEŠELJ**'s cooperation with others to recruit, arm, train and deploy **Šešeljevci** to each of the crime bases where they either directly perpetrated crimes or participated in the perpetration of the crimes. **ŠEŠELJ**'s support for **Šešeljevci** units continued after their deployment and, as discussed at above included visiting them in the field. As mentioned at paragraph PLAVSIĆ spoke explicitly about the supportive impact **ŠEŠELJ**'s visits to the frontlines had on the Serb forces;
- **ŠEŠELJ**'s re-deployment of **Šešeljevci** to conflict areas despite it being well known that they were involved in the commission crimes constituted moral support and endorsement of crimes already committed and encouragement for further criminality.¹⁸²⁴
- In respect of Vukovar, **ŠEŠELJ**'s deployment of **Šešeljevci**, such as KATIĆ, who directly perpetrated many of the crimes; his inflammatory invoking of historical wrongs to justify criminal acts of revenge and his instigatory visit to the frontline shortly before the fall of Vukovar, each clearly constitute examples of acts which had a substantial effect on the commission of the crimes.

¹⁸²² *Nahimana et al.* AJ, para. 482; *Blagojević and Jokić* AJ, para. 127; *Simić* AJ, para. 85; *Blaškić* AJ, para. 48.

¹⁸²³ *Blaškić* AJ, para. 48.

¹⁸²⁴ *E.g.* Rankić, Exh.P01074, paras. 45, 129 (public); VS-033, T.5524-5526 (open).

- In respect of Zvornik, **ŠEŠELJ**'s deployment of **Šešeljevci** who directly perpetrated many of the crimes, his urging, in May 1992 during the midst of the attacks in the municipality, for Serb forces to "clean up" the left bank of the Drina; and his subsequent public endorsement, during the Indictment period, of the massive crimes which had occurred in Zvornik as a "spontaneous" "population exchange", each clearly constitute examples of acts which had a substantial effect on the commission of the crimes. In respect of the latter endorsement it also constituted encouragement for the commission of further ethnic cleansing in BiH.
- In respect of Greater Sarajevo, **ŠEŠELJ**'s deployment, co-ordination of training (through his SRS War Staff and Vojvodas), support and ongoing public endorsement of "prominent" SRS/SČP commanders who directly participated in the crimes and his visits to the **Šešeljevci** units in the region each clearly constitute examples of acts which had a substantial effect on the commission of the crimes. This is particularly well evidenced by statements of the Vojvodas themselves. For example, as described at VI. B. 1. (c) (v) above "Brne" specifically invoked **ŠEŠELJ** while viciously beating a prisoner of war.
- In respect of Mostar and Nevesinje, **ŠEŠELJ**'s deployment of **Šešeljevci**, escalating rhetoric threatening "rivers of blood" in the build-up to the outbreak of ethnic violence there and visits to the region each clearly constitute examples of acts which had a substantial effect on the commission of the crimes. For example, **Šešeljevci** were involved in the shooting of the Muslim civilians captured at Velež and assisted the killing by helping to detain, torture and transport the victims (*see* section VI. C. 3. (b) (i) above murder, cruel treatment and torture, and persecutions against non-Serbs captured at Velež).
- In respect of Hrtkovci, **ŠEŠELJ**'s conduct as described at sections VI. D. above as amounting to direct commission of persecution, deportation and forcible transfer, in addition or in the alternative, clearly constituted moral support and encouragement which had a substantial effect on the conduct of other perpetrators in Hrtkovci in respect of the commission of further similar crimes there.

2. ŠEŠELJ knew he was aiding and abetting the charged crimes

607. **ŠEŠELJ** was fully aware of the likelihood that the charged crimes would be committed;¹⁸²⁵ as has been discussed above in the context of JCE and instigation, he in fact intended their commission. It is not necessary for **ŠEŠELJ** have known the precise crime (in terms of the precise location, number of victims, date) which was intended and actually committed; it is sufficient that **ŠEŠELJ** was aware of the type of crimes (deportation/forcible transfer, murder, torture and cruel treatment, destruction and plunder of property and other persecution) likely to be committed.¹⁸²⁶ There can be no doubt that **ŠEŠELJ** had this knowledge (and he also knew that the perpetrators of the indicted crimes acted with the required intent). **ŠEŠELJ**'s awareness of his own influence with Serbian volunteers,¹⁸²⁷ and in particular **Šešeljević**, is probative also of his knowledge that his words and acts did in fact substantially assist in the commission of the crimes by the physical perpetrators.¹⁸²⁸ In addition, **ŠEŠELJ** made explicit statements which make clear that his acts were designed to assist in the criminal campaign. For example, **ŠEŠELJ** admitted "I'm trying to be present as much as possible in places where I can help, to really help. I'm conscious of my humble capabilities, and they really mustn't be exaggerated. But it's my fundamental desire now to participate in the final operation to liberate Sarajevo".¹⁸²⁹

608. **ŠEŠELJ** is therefore responsible under Article 7(1) of the Statute for aiding and abetting the crimes charged in the Indictment in which his **Šešeljević** participated. The individual crimes in which his **Šešeljević** participated are identified in the Annexes to this brief.

¹⁸²⁵ *Nahimana et al.* AJ, para. 482; *Brđanin* AJ, para. 484; *Simić* AJ, para. 86; *Blaškić* AJ, para.50; *Aleksovski* AJ, para. 162.

¹⁸²⁶ *Nahimana et al.* AJ, para. 482; *Simić* AJ, para. 86; *Blaškić* AJ, 29 July 2004, para. 50.

¹⁸²⁷ Exh.P01220, p.2 (public) (emphasis added). Exh.P01248, p. 6 (public)("The SRS has spread over all areas of RS and it has great influence among the people.").

¹⁸²⁸ *Nahimana et al.* AJ, para. 482; *Blagojević and Jokić* AJ, para. 127; *Brđanin*, AJ, para. 484; *Simić* AJ, para. 86; *Ntagerura et al.* AJ, para. 370; *Blaškić* AJ, paras. 45 and 49; *Vasiljević* AJ, para. 102; *Aleksovski* AJ, para. 162.

¹⁸²⁹ Exh.P01215, p.12 (public). See also Exh.P00255 (public).

IX. SENTENCING

609. The evidence shows that **ŠEŠELJ** is guilty of very serious crimes. He committed those crimes with discriminatory intent, from a position of power. His persistent war against this Tribunal, witnesses and the institutions of international justice both aggravate the gravity of his crimes and demonstrate his complete lack of remorse. Given the gravity and scale of **ŠEŠELJ**'s crimes, the aggravating factors, and the lack of mitigating factors, a 28-year sentence is appropriate.

A. Applicable Law

610. Tribunal jurisprudence sets out the following factors for the Trial Chamber to consider in determining a sentence: (i) the gravity of the offence; (ii) the individual circumstances of the Accused, including aggravating and mitigating circumstances; (iii) the general practice regarding prison sentences in the former Yugoslavia; and (iv) the extent to which any penalty imposed by a court of any State on the convicted person for the same act has already been served.¹⁸³⁰

611. The primary purposes of sentencing are retribution and deterrence.¹⁸³¹ A sentence must be individualised to fit the circumstances of **ŠEŠELJ** and the gravity of the crime.¹⁸³²

B. Gravity of the Offence

612. **ŠEŠELJ**'s crimes were very grave. **ŠEŠELJ** served as a prolific public advocate for an extensive campaign of ethnic cleansing. He called for the forcible expulsion of thousands of non-Serbs. When the Serb leadership heeded his call, he provided thousands of fighters to help carry out the ethnic cleansing. The **Šešeljević** were directly involved in some of the most serious crimes charged in the Indictment.

613. The gravity of a convicted person's offence is the "primary consideration" in sentencing.¹⁸³³ To determine the gravity of an offence, Chambers have considered *inter alia*, (i) the inherent gravity of the crimes and the criminal conduct of the wrongdoer; (ii) the number of victims and effect of the crimes, including the effect of

¹⁸³⁰ *D.Milošević* AJ, para.296; *Blaškić* AJ, para.679; *Perišić* TJ, para.1791; Statute, Article 24; Rules 101-106.

¹⁸³¹ *Aleksovski* AJ, para.185; *Krajišnik* AJ, paras.775, 803; *Perišić* TJ, para.1794.

¹⁸³² *Strugar* AJ, paras.336,348; *Galić* AJ, para.393; *Perišić* TJ, para.1793.

¹⁸³³ *Galić* AJ, para.442; *Blaškić* AJ, para.683; *Perišić* TJ, para.1799.

long-term physical, psychological and emotional suffering on the victims; and (iii) whether the crime is of an “inherently discriminatory character,” such as persecution or genocide.¹⁸³⁴

614. Here, the massive ethnic cleansing campaign was grave. **ŠEŠELJ** and his fellow JCE members expelled more than 200,000 Croat civilians from their homes,¹⁸³⁵ and succeeded in fundamentally redrawing the ethnic map of Bosnia and Herzegovina to create an ethnically-separated Serb territory.¹⁸³⁶ **ŠEŠELJ** played a critical role, both in providing fighters to carry out this criminal enterprise and in serving as the public voice of the quest for forcibly meeting an ethnically-separated Serb territory.

615. Finally, **ŠEŠELJ**’s crimes are of an inherently discriminatory nature. **ŠEŠELJ** committed persecution of non-Serb civilians in three separate republics. Moreover, his call for the forcible transfer of non-Serbs was itself inherently discriminatory.

C. Aggravating Factors

616. Trial Chambers have looked to, *inter alia*, interference with the proper administration of justice, premeditation and motive, the vulnerability of victims, the length of time during which a crime continued, and abuse of a position of authority as aggravating circumstances.¹⁸³⁷

1. Interference with the Administration of Justice

617. **ŠEŠELJ** and his associates planned to interfere with the trial, constituting an aggravating factor for sentencing purposes.¹⁸³⁸

618. From early in the proceedings, **ŠEŠELJ** declared his intent to cause “tectonic disturbances” in the administration of international justice.¹⁸³⁹ He and his associates have been successful in destabilizing this trial by targeting key witnesses.

¹⁸³⁴ *Perišić* TJ, para.1799 (citations omitted). *See also Vasiljević* TJ, para.278 (“crimes based upon ethnic grounds are particularly reprehensible”).

¹⁸³⁵ Exh.P00632 (public).

¹⁸³⁶ *See Annexes A-E.*

¹⁸³⁷ *Perišić* TJ, paras.1801, 1823-26; *Blaškić* AJ, para.686.

¹⁸³⁸ *Delalić et al.* TJ, paras.1244, 1251; *Delalić* AJ, paras.786-789.

¹⁸³⁹ Professor Vojislav Šešelj’s Motion for Trial Chamber III to Order Measures and Ensure Protection of Defence Witnesses (Submission 394), filed 23-Sept-2008, confidential, p.150.

619. One of the ways **ŠEŠELJ** and his associates sought to disturb the proceedings was through interfering with witnesses. [REDACTED] testified about witness Ljubiša PETKOVIĆ's instructions not to cooperate with the OTP. PETKOVIĆ told [REDACTED] (i) that he should not testify for the Prosecution; and (ii) that he should testify only as a court witness subject to specific conditions.¹⁸⁴⁰ VS-033 further testified that [REDACTED] were both threatened, and that [REDACTED].¹⁸⁴¹ [REDACTED] **ŠEŠELJ** "exerted pressure on" [REDACTED] through his "people from the Serbian Radical Party" who had made threats.¹⁸⁴²

620. Consistent with [REDACTED] allegation that "people from the SRS" pressured witnesses on **ŠEŠELJ**'s behalf, other witnesses testified that they had been pressured by **ŠEŠELJ**'s supporters.¹⁸⁴³

621. **ŠEŠELJ** has also twice been convicted of contempt of court for disclosing confidential witness information.¹⁸⁴⁴ The Registry concluded that this conduct constitutes "an apparent attempt to interfere with or intimidate witnesses" as well as deliberate obstruction of justice.¹⁸⁴⁵

622. [REDACTED].¹⁸⁴⁶ One witness recanted his own recantation,¹⁸⁴⁷ and the recantations generally lack credibility. [REDACTED], false recantations suggest witness interference. A formerly cooperating witness would not spontaneously make false allegations against the OTP or falsely recant a truthful statement. One witness doing so would raise an inference of tampering; when a series of cooperating witnesses offer false allegations, there is no other reasonable inference except tampering.

2. Other aggravating factors

623. **ŠEŠELJ**'s acts were premeditated. Indeed, the JCE to forcibly create an ethnically-separate Serb territory free of its "Ustasha" and "Pan-Islamist" civilian populations represented the culmination of years of political and propaganda efforts

¹⁸⁴⁰ [REDACTED].

¹⁸⁴¹ VS-033, T.5636-5637, 5609-5611, 5618 (open), [REDACTED].

¹⁸⁴² [REDACTED].

¹⁸⁴³ *E.g.* [REDACTED]; Ejčić, T.10313-10315 (open).

¹⁸⁴⁴ Case No.IT-03-67-R77.2, Case No.IT-03-67-R77.3.

¹⁸⁴⁵ Registry Submission Pursuant to Rule 33(B) on **ŠEŠELJ**'s Request for Review of Decision to Monitor his Privileged Communications, public redacted, 1-Dec-2011, paras. 23-24.

¹⁸⁴⁶ [REDACTED].

on ŠEŠELJ's part. ŠEŠELJ's persecutory propaganda had the impact of initiating and aggravating the conflict and associated crimes. As the *Krštić* Trial Chamber held, this "necessarily reveals a higher level of criminality."¹⁸⁴⁸

624. While his discriminatory motivations are an element of the crime of persecution, for his other offences, those motivations constitute an aggravating factor.¹⁸⁴⁹

625. During the conflict, ŠEŠELJ also called for a campaign against non-Serbs. Many of the victims of targeted crimes were women and children (such as at Boračko Jezero), elderly (such as in Nevesinje), and detained persons (such as at Ovčara, Velepromet, Uborak, Sutina, Čelopek Dom Culture, Karakaj Technical School, Drinjača Dom Culture, Mount Igman and elsewhere). The special vulnerability of these victims constitutes an aggravating factor.¹⁸⁵⁰

626. If released, ŠEŠELJ would be very likely to commit the same crimes. Indeed, ŠEŠELJ repeatedly used this trial to parrot the same vicious ethnic hatred with which he called his fighters to war. As he said, he is charged with "use of the concept of Ustasha and Bosnian pan-Islamists." In his view, however, those pejorative terms are "not stereotypes; it's reality."¹⁸⁵¹ As ŠEŠELJ informed the Chamber at the beginning of the trial, "I hold the same positions today that I held 15 or 17 years ago."¹⁸⁵²

627. ŠEŠELJ abused his positions of authority. Throughout the Indictment period, he was a member of parliament, the leader of two Serb nationalist political organizations, the commander of a military-based organization, and the publisher of two periodicals. As discussed in paragraph 164 above and as VS-002 also testified ŠEŠELJ was "a sort of god" and "he was a *vojvoda*. We would not have refused his order." Instead of using his public authority to mitigate the consequences of the conflict or protect vulnerable victims, ŠEŠELJ took advantage of the conflict and his position to prey upon the worst fears of everyday people and stoke the fires of violent nationalism.

¹⁸⁴⁷ Exh.P01082 (public).

¹⁸⁴⁸ *Krštić* TJ, para.711 (citation omitted).

¹⁸⁴⁹ *Vasiljević* TJ, para.278.

¹⁸⁵⁰ Compare e.g. *Perišić* TJ, para.1817 (citations omitted) (holding that civilian victims and particularly women, children and the elderly were "particularly vulnerable").

¹⁸⁵¹ T.1912 (open).

D. Mitigating Factors

628. The evaluation of mitigating circumstances is within the Trial Chamber's discretion. Trial Chambers have accepted factors such as post-conflict conduct which promoted peace and reconciliation; substantial and qualitative cooperation with the Office of the Prosecutor; voluntary surrender; good character; compliance with conditions of provisional release; the convicted person's family situation; and the convicted person's age and the probability of re-offending.¹⁸⁵³

629. **ŠEŠELJ**'s voluntary surrender is simply the fulfilment of his legal obligation. It is entitled to no weight in mitigation.¹⁸⁵⁴ This is particularly true because **ŠEŠELJ** followed his surrender with a campaign of propaganda, intimidation, and misinformation directed at undermining and delegitimizing the trial.

630. Finally, **ŠEŠELJ** has shown no remorse. As noted above, his statements show that – far from being remorseful – he would be extremely likely to re-offend if released.

E. Sentencing practice in courts of the former Yugoslavia

631. Under SFRY law, war crimes against the civilian population were punishable by the death penalty or a sentence of up to twenty years incarceration.¹⁸⁵⁵ The Tribunal is not required to conform to SFRY sentencing practice, but may sentence convicted persons to any term of incarceration up to and including a life sentence.¹⁸⁵⁶

F. Recommended Sentence

632. Due to the vast number of victims, the gravity of **ŠEŠELJ**'s crimes, his discriminatory motivations for committing those crimes, his abuse of authority, and his continuing attempts to undermine the prospects for peace in the former Yugoslavia through his abuse of the proceedings at this Tribunal, **ŠEŠELJ** should be sentenced to serve 28 years in prison in addition to his sentences for contempt of court.

¹⁸⁵² T.1856 (open).

¹⁸⁵³ *Perišić* TJ, paras.1802, 1827-34.

¹⁸⁵⁴ *But see Plavšić* SJ, para.84; *Jokić* SJ, para.73.

¹⁸⁵⁵ Criminal Code of the FRY, Article 142(1).

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Dated this 5th day of February 2012
At The Hague, The Netherlands

¹⁸⁵⁶ *Blaškić* AJ, paras.681-82; *Perišić* TJ, paras.1793, 1803; *Krajišnik* AJ, para. 749; *Galić* AJ, para. 398; Statute, Article 24(1).

PUBLIC REDACTED
ARGUMENTATIVE APPENDIX

X. ŠEŠELJ'S STATEMENTS

633. ŠEŠELJ's statements demand careful scrutiny. ŠEŠELJ's self-incriminating statements have, by their nature, strong indicia of reliability. "Reasonable people, even reasonable people who are not especially honest, tend not to make self-inculpatory statements unless they believe them to be true."¹⁸⁵⁷

634. For example, in *Milošević*,¹⁸⁵⁸ ŠEŠELJ testified that:

I went to Vukovar twice while the struggle for liberation was going on. I saw everything. I was at the front lines. I visited almost every street. It's impossible that there was something there that I didn't see.¹⁸⁵⁹

and added that:

I'm absolutely convinced that I would know if some of our volunteers were involved in some crimes [...] but there was simply no such information.¹⁸⁶⁰

635. Substantial evidence corroborates the self-incriminating statement that ŠEŠELJ knew what was happening in Vukovar¹⁸⁶¹ and contradicts his self-serving statement that he had no information about Šešeljević committing crimes. In fact, the criminal activity of the Šešeljević was open and notorious.¹⁸⁶² In this example, his incriminating statement should be credited because it is corroborated and his self-serving statement should be disregarded because it is contradicted by the evidence.

636. Specifically, self-serving statements made by ŠEŠELJ during his *Milošević* testimony, in his unsworn 84bis statement, or during the Indictment period should be rejected unless corroborated by other credible evidence.¹⁸⁶³ Additionally, these self-serving statements should be rejected because as a named JCE member in the

¹⁸⁵⁷ *Williamson v. U.S.*, 512 U.S. 594, 599 (1994). See Comment of the Advisory Committee for the Federal Rules of Evidence to FRE 804(b)(3) ("The circumstantial guaranty of reliability for declarations against the interest is the assumption that persons do not make statements which are damaging to themselves unless satisfied for good reason that they are true").

¹⁸⁵⁸ Šešelj, Exh.P00031(public)

¹⁸⁵⁹ Šešelj, Exh.P00031, p.542(public).

¹⁸⁶⁰ Šešelj, Exh.P00031, p.599(public).

¹⁸⁶¹ See paras.47-49,141,144,146,194-195 above. Petković, Exh.C00012, para.31 (public).

¹⁸⁶² See paras.137-138,140,141,194 above.

¹⁸⁶³ See *Butare* TJ, paras.1203, 1401, 1950.

Milošević indictment,¹⁸⁶⁴ **ŠEŠELJ** had a motive to shape his testimony to evade criminal liability.¹⁸⁶⁵ As an Accused, **ŠEŠELJ** has the same motive. As a perpetrator, his exculpatory statements and denials of criminal responsibility during the conflict require careful scrutiny where uncorroborated because perpetrators will deny wrongdoing.

637. **ŠEŠELJ**'s self-serving comments in *Milošević* and his unsworn 84bis statement must also be weighed in light of **ŠEŠELJ**'s view of his trial as a political battle to destroy this Tribunal¹⁸⁶⁶ and to advance his vision for Serbia.¹⁸⁶⁷ He admits that false accusations, lying and propaganda are acceptable tools in his political battles,¹⁸⁶⁸ and he, as an Accused, has "the right to lie."¹⁸⁶⁹ Common sense, legal precedent and the evidence dictate that none of **ŠEŠELJ**'s self-serving statements, in any form, should be accepted without corroboration from other significant, independent, credible evidence. The Trial Chamber will find none in the evidence.

638. Finally, throughout the course of his trial, **ŠEŠELJ** has made speeches in the courtroom commenting on evidence and purporting to correct or instruct witnesses and the Trial Chamber on facts. **ŠEŠELJ**'s speeches are not evidence. The Trial Chamber must ignore them.

¹⁸⁶⁴ See Indictment, para. 8(a) (listing Milošević as a member of the JCE); Milošević Second Amended Indictment "Croatia" 28 July 2004, para.7 (listing Šešelj as a member of the JCE); Milošević Amended Indictment Bosnia and Herzegovina, 22 November 2002, para. 7 (listing Šešelj as a member of the JCE).

¹⁸⁶⁵ *Perišić* TJ, paras.33-34; *Popović* TJ para.42-43; *Gotovina*, para.31. See also *Ntakirutimana & Ntakirutimana*, Judgement (AC), para.129; *Boškoski* TJ, paras.12, 13, 17.

¹⁸⁶⁶ E.g. T.17031 (open); T.1214-1215 (open).

¹⁸⁶⁷ T.1945-47 (open), T.1882 (open)("Greater Serbia is our long-term objective"); T.1856 (open)("I hold the same positions today that I held 15 or 17 years ago").

¹⁸⁶⁸ E.g. Šešelj, Exh.P00031, pp.1048-1051 (public); VS-004, T.3522 (open).

¹⁸⁶⁹ T.15059 (open); [REDACTED]. Of course, where an Accused person has the right to lie, his denial of guilt is only a "slight indication of innocence." E.g. *People v. Agim Sylejmani*, P.Nr.141/01, District court of Peje/Peć, 11 January 2011, p.9.

XI. NON-APPEARING WITNESSES AND RECANTING WITNESSES

A. The Written OTP Statements of Recanting, Partially Recanting and Non-Appearing ŠEŠELJ Affiliated Witnesses Should be Credited and Recanting Testimony Rejected

639. All admitted OTP written statements¹⁸⁷⁰ of the recanting, partially recanting and non-appearing witnesses contain the traditional indicia of reliability,¹⁸⁷¹ and reliable facts corroborated by other credible evidence to allow the Trial Chamber to give them weight. However, for witnesses having potential criminal liability, portions of their written statements tending to minimize their own involvement or not corroborated by the other evidence can be rejected.

640. The Trial Chamber can rely on the admitted OTP statements because other evidence corroborates this evidence. The corroborating evidence is found in the Prosecution's discussion of evidence and related footnotes in the Final Brief but The Prosecution has included specific examples of corroborated evidence for the Trial Chamber's consideration below. The wealth of reliable indicia and corroboration on the key points makes the admitted OTP statements credible on discrete uncorroborated points, especially when the proffered evidence is not self-serving.

641. In contrast, the testimonial recantations of some of these witnesses are marked by outlandish accusations,¹⁸⁷² selective recall and contradictions with previous statements and other evidence. These recantations are not worthy of credit. The recantations were the product of an organized campaign to deter witnesses from testifying truthfully. This campaign also caused the non-appearance of ŠEŠELJ

¹⁸⁷⁰ Witnesses Ljubiša Petković, VS-026, Zoran Dražilović and VS-034 all failed to appear for testimony. Witnesses Aleksandar Stefanović, Zoran Rankić, Vojislav Dabić, Nenad Jović, Jovan Glamočanin, Nebojša Stojanović and VS-037 all testified and either wholly or partially recanted their written statements; "Decisions Admitting Written Statements of Recanting and Non-Appearing Witnesses."

¹⁸⁷¹ "Traditional indicia of reliability" include, in some combination, the page by page signature and initials of the witness making the statement, signatures by others present, declarations of truthfulness, accuracy and translation, and the acknowledgement of an opportunity to correct errors and comment on prior statements. *E.g.* Decision on the Prosecution's Oral Motion Seeking the Admission into Evidence of Nebojša Stojanović's Three Statements (public), 11-Sept-2008, paras.13-15; [REDACTED].

¹⁸⁷² *E.g.* Stefanović's claim that his signature was scanned and copied onto the page until confronted with the original. Stefanović, T.12249-12252 (open); Rankić's claim that the OTP kidnapped and held

affiliated witnesses for *vive voce* testimony precluding their cross-examination. Because ŠEŠELJ caused his inability to cross-examine these witnesses, ŠEŠELJ's failure to cross-examine them is irrelevant to assessing the weight of their statements.

642. In fact, the lengths taken to influence these witnesses to disavow their statements prove the falsity of the recantations and give credibility to the admitted OTP written statements. For example, PETKOVIĆ, who after his refusal to testify became an MP of the SRS, pressured [REDACTED] not to testify,¹⁸⁷³ and claimed that [REDACTED].¹⁸⁷⁴

643. This Trial Chamber admitted Nebojša STOJANOVIĆ's prior statements and concluded that his testimonial explanations of his recantations strained credibility and failed to impugn his written statement.¹⁸⁷⁵ A similar careful analysis for all the recanting, partially¹⁸⁷⁶ recanting and non-appearing witnesses¹⁸⁷⁷ will lead the Trial Chamber to the same conclusion.

B. The statements of Non-Appearing Witnesses should be given full weight

644. The written and video statements of non-appearing witnesses, Ljubiša PETKOVIĆ, Zoran DRAŽILOVIĆ, [REDACTED] should be relied upon by the Chamber.¹⁸⁷⁸ As witnesses with potential criminal liability, where their statements are self-serving they should be closely scrutinized. Such scrutiny reveals that the written statements of the non-appearing witnesses are corroborated on crucial facts, as demonstrated for each witness below.

645. The absence of the non-appearing witnesses is due to their close association to ŠEŠELJ. For instance, ŠEŠELJ declared PETKOVIĆ to be a defence witness¹⁸⁷⁹

him hostage in the Netherlands, although he had keys to his own apartment, money, and identification which allowed him to travel freely. Rankić, T.15995, 15998-15999 (open).

¹⁸⁷³ [REDACTED].

¹⁸⁷⁴ [REDACTED].

¹⁸⁷⁵ Decision on the Prosecution's Oral Motion Seeking the Admission into Evidence of Nebojša Stojanović's Three Statements (public), 11-Sept-2008, para. 15.

¹⁸⁷⁶ A Chamber can choose to credit a written statement over *vive voce* testimony. Mrkšić, TJ, para.396; Mrkšić AJ, paras. 171-172.

¹⁸⁷⁷ Aleksander Stefanović, Zoran Rankić, Vojislav Dabić, Nenad Jović, Jovan Glamočanin; Nebojša Stojanović; VS-037; VS-026, VS-034, Zoran Dražilović, Ljubiša Petković.

¹⁸⁷⁸ Statements by these witnesses are admitted as: Exh.C00011(public); Exh.C00012(public); Exh.C0013(public); Exh.C00014(public); Exh.C00015(public); Exh.C00016(public); Exh.C00017(public); Exh.C00018(public); Exh.C00010 (public); [REDACTED].

¹⁸⁷⁹ [REDACTED]

then lauded PETKOVIĆ absence to other witnesses, including recanting witness RANKIĆ.¹⁸⁸⁰ After PETKOVIĆ's failed to appear, he became an MP representing the SRS.¹⁸⁸¹ PETKOVIĆ, in turn, pressured [REDACTED] not to appear for testimony and to get the Prosecution to "fuck off,"¹⁸⁸² and they were both threatened.¹⁸⁸³ Subsequently, [REDACTED] did not appear. All of the non-appearing witnesses, along with some of the recanting witnesses, responded to Trial Chamber subpoenas with documents containing a substantially identical set of specific demands,¹⁸⁸⁴ [REDACTED].¹⁸⁸⁵ DRAŽILOVIĆ, [REDACTED] appeared as witnesses for ŠEŠELJ in his contempt trial;¹⁸⁸⁶ despite the failure of DRAŽILOVIĆ [REDACTED] to appear [REDACTED].¹⁸⁸⁷ Under these circumstances, according full weight to the written statements in the absence of cross examination does not prejudice ŠEŠELJ.

(a) Ljubiša PETKOVIĆ (Non-appearing witness)

646. Much of the key evidence PETKOVIĆ provided in written and video statements is corroborated, for example:

- ŠEŠELJ's control over the SRS/SČP and the War Staff.¹⁸⁸⁸
- The perfunctory nature of the checks performed before a Volunteer was enlisted and sent to the front.¹⁸⁸⁹
- Šešeljevci were sent to Arkan's training center at Erdut.¹⁸⁹⁰
- SRS/SČP commanders went to Belgrade headquarters regularly to meet with ŠEŠELJ and provide verbal reports.¹⁸⁹¹

¹⁸⁸⁰ Rankić, T.16020 (open)

¹⁸⁸¹ Rankić, T.16020 (open).

¹⁸⁸² [REDACTED].

¹⁸⁸³ [REDACTED]; VS-033, T.5617-5618 (open); [REDACTED].

¹⁸⁸⁴ E.g. Zoran Dražilović, Ljubiša Petković, Zoran Rankić, VS-026, Nenad Jović, VS-034, Nebojša Stojanović. E.g. [REDACTED].

¹⁸⁸⁵ [REDACTED].

¹⁸⁸⁶ *Prosecutor v. Vojislav Šešelj*, Case No.IT-03-67-R77.3, [REDACTED], T.262-271, 296-313 (open).

¹⁸⁸⁷ [REDACTED].

¹⁸⁸⁸ Petković, Exh.C00013, pp.26-27 (public), Exh.C00018, para.17 (public); Glamočanin, Exh.P00688, paras.56, 59, 94, 97(public); Rankić, Exh.P01074, para.19, (BCS) p.38 (public); [REDACTED].

¹⁸⁸⁹ Petković, Exh.C00011, p.6 (public); Exh.C00013, pp.62,64-66 (public); Exh.C00018, para.34 (public); Rankić, Exh.P01074, paras.34-35 (public).

¹⁸⁹⁰ Petković, Exh.C00018, para.38 (public); Stojanović, Exh.P00528, paras.18-20 (public).

- Military-like structure of the SRS/SČP.¹⁸⁹²
- Srećko RADOVANOVIĆ aka Debeli was a **Šešeljevac** whose SRS/SČP unit was trained by MUP Serbia.¹⁸⁹³
- “Brne” and “Čele” were SRS/SČP Commanders in Slavonia, Baranja and Western Srem.¹⁸⁹⁴
- **Šešeljevci** were in Mostar and Nevesinje.¹⁸⁹⁵

(b) Zoran DRAŽILOVIĆ (Non-appearing witness)

647. Much of the key evidence DRAŽILOVIĆ provided in written statements is corroborated, for example:

- **ŠEŠELJ** visited the volunteers on the front in Vukovar on or about 8 November 1991.¹⁸⁹⁶
- The significant number of **Šešeljevci** deployed to BiH,¹⁸⁹⁷ and “Greater Sarajevo.”¹⁸⁹⁸
- **Šešeljevci** in Mostar and Nevesinje operated with the JNA.¹⁸⁹⁹

¹⁸⁹¹ Petković, Exh.C00018, para.46 (public); Stoparić, T.2333-34 (open); Rankić, Exh.P01074, paras.32 and 125 (public). *See also* [REDACTED]; VS-033, T.5532(open); [REDACTED]; Glamočanin, Exh.P00688, para.50 (public) (ŠEŠELJ received intelligence from Chetnik commanders in the field).

¹⁸⁹² [REDACTED]. *See* paras.127,146 above.

¹⁸⁹³ Petković, Exh.C00018, paras.49, 50 (public); Exh.C00015 pp.27-30 (public); [REDACTED].

¹⁸⁹⁴ [REDACTED]; VS-1013, T. 5309-5318; 5352-5358 (open); Exh.P01000(public); Exh.P00217, p.2 (public).

¹⁸⁹⁵ Petković, Exh.C00018, para.56 (public); Exh.C00011, pp.16, 19 (public); Exh.P01002, p.1(public). *See also* Dražilović, Exh.C00010, paras.30, 47,49 (public) (SRS volunteers were in Mostar and throughout Eastern Herzegovina). *See* paras. 264-271 above.

¹⁸⁹⁶ Petković, Exh.C00011, pp.15-16 (public) (Petković stated that ŠEŠELJ was in Vukovar before its fall but made inconsistent statements about when his own visit to Vukovar with ŠEŠELJ occurred); Dražilović, Exh.C00010, para.37 (public) (Dražilović stated that he, Petković and ŠEŠELJ travelled together towards Vukovar before it fell, stopping in Sid where Dražilović remained); Testimony that he visited in October and then again in November of 1991. [REDACTED]; Rankić, Exh.P01074, para.66 (public) (dating the visit at mid-November 1991, before the fall of Vukovar)

¹⁸⁹⁷ Dražilović, Exh.C00010, para 47 (public). *See also* Exh.P01202, p.5 (public); Exh.P00055, p.9 (public) (According to Vakić, 1992 was a year of “big battles between the Serbian Chetnik volunteers and the Usthas in Trebinje municipality and Islamic converts in Bileća, Gacko and Nevesinje municipalities” in Eastern Herzegovina); Šešelj, Exh.P00031, p.665 (public). *See* paras.248-250 above.

¹⁸⁹⁸ *E.g.* Dražilović, Exh.C00010, para.57 (public) (volunteers sent to Ilidža, Rajlovac, Vogošća and the Jewish Cemetery); Bošković, Exh.P00836, paras.28, 29 (public) (presence of **Šešeljevci** from Zvornik in Ilidža in 1992); Exh.P01215, p.12 (public) (ŠEŠELJ claimed in relation to Sarajevo “we’ve got a considerable number of volunteers”). *See* paras.258, 259 (above).

- RANKIĆ accompanied “Repić” and “Žuća” to Bosnia.¹⁹⁰⁰
- ŠEŠELJ talked about “Greater Serbia” in all his speeches,¹⁹⁰¹ and his words had a marked effect on the Serb nationalists that heard them.¹⁹⁰²
- ŠEŠELJ’s control over the War Staff and communication with the SRS/SČP unit commanders in the field.¹⁹⁰³

(c) VS-026 (non-appearing witness)

648. Much of the key evidence VS-026 provided in written statements is corroborated, for example:

- The JNA and local authorities were aware of Šešeljevi and Chetnik abuses in Vukovar and took no action.¹⁹⁰⁴
- The particularly brutal methods used by the Chetniks and the members of the Leva Supoderica Detachment.¹⁹⁰⁵
- Information about the abuse and murders at Ovčara/Grabovo and Velepromet and who perpetrated them was widely known almost immediately.¹⁹⁰⁶
- Local municipal leaders in Hrtkovci who disapproved of the campaign against non-Serbs were intimidated into abandoning their posts, which SRS affiliates assumed.¹⁹⁰⁷

¹⁸⁹⁹ Šešelj, Exh.P00031, p.862 (public); Exh.P01002, p.1 (public). *See also* Dražilović, Exh.C00010, paras.30, 47, 49 (public)(SRS volunteers were in Mostar and throughout Eastern Herzegovina); Perković, Exh.C00011, pp.16, 19 (public); Petković, Exh.C00018, para.56(public); Exh.P01180, p.32 (public) (acknowledging on 1 June 1991 that he sent SRS/SČP volunteers to every Serb village that was endangered).

¹⁹⁰⁰ Dražilović, Exh.C00010, para 51(public); Rankic, Exh.P01074, para.107(public).

¹⁹⁰¹ Dražilović, Exh.C00010, para.59 (public). *E.g.* paras.46,92,497,508 above.

¹⁹⁰² Stoparić, T.2440, 2442-2444, 2659-2660 (open); Dražilović, Exh.C00010, para 28 (public). *See* paras. 160-165, 513 above.

¹⁹⁰³ Petković, Exh.C00013, pp.26-27, 44, 52 (public); Exh.C00018, para.17 (public); Dražilović, Exh.C00010, paras.27,44 (public); VS-033, T.5530-31 (open); Rankić, Exh.P01074, para 32, 125 p.49 (public); Glamočanin, Exh.P00688, para 50 (public). *See* paras.43-44,47-48 above.

¹⁹⁰⁴ [REDACTED]. Stojanović, Exh.P00528, paras.41, 47 (public). Stojanović, Exh.P00526, para.27 (public). *See also* paras.136-141 above.

¹⁹⁰⁵ [REDACTED]. *See* paras.137-140, 178-179,185,187-189,192-193 above.

¹⁹⁰⁶ Vukašinović, T.12326 (open); Vojnović, Exh.P00604 para.52 (public); Stoparić, T.2352 (open); [REDACTED]; Exh.P00373 (public). *See also* [REDACTED]; Exh.P00528, para. 54 (public); [REDACTED]. *See* para.194 above.

(d) VS-034 (Non-Appearing Witness)

649. Much of the key evidence VS-034 provided in written statements¹⁹⁰⁸ is corroborated, for example:

- **ŠEŠELJ** gave himself military-style titles such as “Supreme Commander” and “the commander of the operative detachments of the SČP in the homeland”.¹⁹⁰⁹
- **ŠEŠELJ** called for the expulsion of *Ustaša*.¹⁹¹⁰

C. The admitted OTP written statements of recanting and partially recanting witnesses should be given full weight and their recanting testimony rejected.

650. The admitted written OTP statements of the recanting and partially recanting witnesses, Zoran RANKIĆ, Nebojša STOJANOVIĆ, Nenad JOVIĆ, Jovan GLAMOČANIN, [REDACTED], Aleksandar STEFANOVIĆ and [REDACTED] should be credited by the Trial Chamber.¹⁹¹¹ In addition to the indicia of procedural reliability, the content of the statements can be relied upon because all the statements contain key evidence against **ŠEŠELJ** which is substantially corroborated by other evidence. Where the witnesses make statements which are self-serving, tending to minimize their own culpability, and are not corroborated by other evidence, those portions can be rejected

D. The testimonial recantations of these witnesses should be rejected by the Trial Chamber.

651. The witnesses were often outspoken in their biased support of **ŠEŠELJ**, for example when GLAMOČANIN declared: I am going to defend my Serb, Vojislav

¹⁹⁰⁷ [REDACTED]; VS-035, T.10528 (open); Exh.P00550, p.3(public); Exh.P00559 p.2(public). See paras.515-517 above.

¹⁹⁰⁸ Rankić, Exh.P01074 (public); Exh.P01075 (public); Exh.P01076 (public).

¹⁹⁰⁹ Exh.P00154, p.2 (public); Exh.P00059 (public); [REDACTED]; Glamočanin, Exh.P00688, para.59 (public); VS-033, T.5510 (open). See para.47 above.

¹⁹¹⁰ [REDACTED]. E.g. paras.157-163, 491 above.

¹⁹¹¹ These statements are in evidence as: Exh.P00633 (public); Exh.P00634 (public); [REDACTED]; Exh.P00688 (public); Exh.P01074 (public); Exh.P01075 (public); Exh.P01076 (public); Exh.P00526 (public); Exh.P00527 (public); Exh.P00528 (public); Exh.P01077 (public); Exh.P01078 (public); Exh.P01079 (public); Exh.P01081(public); [REDACTED].

ŠEŠELJ.¹⁹¹² [REDACTED], when confronted with his prior statement during his recantation of Šešeljević crimes in Zvornik, acknowledged what he said in the OTP interview but added that it was supposed to be evidence against STANIŠIĆ and nobody told him he would have to testify against ŠEŠELJ and thereafter recanted the portion of his statement which identified the volunteers in question as Šešeljević.¹⁹¹³ During his testimony, JOVIĆ declared himself to be “against those prosecutors who meddled in that former Yugoslavia of ours, and the whole Hague Tribunal and those prosecutors over there.”¹⁹¹⁴ JOVIĆ also claimed the court interpreter said “Seselj’s scum,” until the recording proved it was not said.¹⁹¹⁵

652. The recantations showed signs of orchestration in their similarity, both in the witnesses’ objections to appearing and in the testimony itself. [REDACTED] insisted on testifying without the protective measures that had been granted them.¹⁹¹⁶ Before recanting, JOVIĆ disclosed to the OTP some of the tactics suggestion by ŠEŠELJ’s Associates to discredit his written statements and himself. One of their suggestions was that JOVIĆ claim he was drugged as a way to discredit the OTP investigators.¹⁹¹⁷ Indeed, during STEFANOVIĆ’s recantation, he claimed he was drugged and drunk during the OTP interviews such that the OTP investigators could have written anything down and he would have signed it,¹⁹¹⁸ an assertion which is belied by the fact that he verified the accuracy of every portion of the statement that did not pertain to ŠEŠELJ.¹⁹¹⁹

653. RANKIĆ, STEFANOVIĆ, STOJANOVIĆ and GLAMOČANIN all disavowed even knowing what was in their written statements despite circumstances which made such disavowals absurd. For example, RANKIĆ provided five statements between 2003-2006, in the presence of seventeen different people, the statements recorded when RANKIĆ said he had no knowledge on a particular subject and he

¹⁹¹² Glamočanin, T.12860 (open).

¹⁹¹³ [REDACTED].

¹⁹¹⁴ Jović, T.16184-16185 (open).

¹⁹¹⁵ Jović, T.16253-16254, T.16255-16256 (open).

¹⁹¹⁶ [REDACTED]

¹⁹¹⁷ Exh.P01079, para.18 (public); Exh.P01080 (public); Exh.P01082 (public); Exh.P01083 (public); T.16281-16284 (open); Exh.P01084 (public).

¹⁹¹⁸ Stefanović, T.12102-12103 (open).

¹⁹¹⁹ Decision on evidence Presented During Testimony of Aleksandar Stefanović (public), 12-Mar-2009, paras.11,12.

signed and acknowledged all of them.¹⁹²⁰ STEFANOVIĆ and GLAMOČANIN, respectively a member of parliament¹⁹²¹ and a politician trained as a lawyer,¹⁹²² also claimed to have signed multiple documents even though they were totally unaware of the contents.¹⁹²³ STOJANOVIĆ claimed to have been “astounded” by the contents of his OTP statements, despite having turned over numerous documents in support of them.¹⁹²⁴

654. The recantations contained allegations that have been rejected by the Trial Chamber.¹⁹²⁵ For example, RANKIĆ’s assertion that he was kidnapped by the OTP and held in confinement in the Netherlands, when in reality, he was provided with a monetary stipend, an identification allowing him to move freely and a key to his own apartment.¹⁹²⁶ STEFANOVIĆ’s claim that the VWS representative was an “intelligence officer” who had come to kidnap or assassinate him on the day of his testimony.¹⁹²⁷ GLAMOČANIN’s claim that the OTP tried to enlist him to “politically liquidate” ŠEŠELJ and that an *amicus curiae* of the court showed up at his house with a bag full of money.¹⁹²⁸

655. Finally, as demonstrated below, the recantations should be rejected because they contain factual assertions which are contradicted by other credible evidence.

(a) Zoran RANKIĆ (Recanting Witness)

656. Much of the key evidence RANKIĆ provided in written statements is corroborated, for example:

¹⁹²⁰ Oral Decision, T.16373-16374 (open). *See also*, Rankić, T.15980-15981, 15989-15991, 15983-15985 (open).

¹⁹²¹ Stefanović, Exh.P00633, p.1 (public); T.12249-12252 (open).

¹⁹²² Glamočanin, Exh.P00688 paras.2, 8-10 (public); T.12884 (open).

¹⁹²³ Stefanović, T.12249-12252 (open); Glamočanin, T.12859 (open).

¹⁹²⁴ Stojanović, T.9794-9795 (open). Stojanović, Exh.P00526, paras.41-42 (public); Exh.P00528, paras.56-57 (public); Stojanović, T.9725-9726 (open).

¹⁹²⁵ *Décision Relative À La Requête Pour Outrage de Vojislav Šešelj Contre Carla Del Ponte, Hildegard Uertz-Retzlaff et Daniel Saxon et aux Demandes Subséquentes de l'Accusation*, 22 December 2011 (public).

¹⁹²⁶ Rankić, T.15995, 15998-15999 (open).

¹⁹²⁷ Stefanović, T.12103-12108 (open).

¹⁹²⁸ Glamočanin, T.12858-12861 (open).

- ŠEŠELJ's pronouncement that "Not one Ustaša shall leave Vukovar Alive," and the circumstances of ŠEŠELJ's visit to Vukovar.¹⁹²⁹
- Terrible crimes were committed by Volunteers like "Topola" and "Repić".¹⁹³⁰
- ŠEŠELJ's autocratic nature and his complete control over the SRS/SČP and the War Staff.¹⁹³¹
- The perfunctory nature of the checks performed before a Volunteer was enlisted and sent to the front.¹⁹³²
- SRS/SČP commanders would regularly go the Belgrade headquarters to meet with ŠEŠELJ to provide verbal reports.¹⁹³³
- Extensive cooperation and coordination between SRS War Staff and Serbian Ministry of Defence and the Serbian Ministry for Relation with Serbs Outside Serbia to discuss deployment.¹⁹³⁴

657. RANKIĆ's recantation contains uncorroborated assertions. For example:

- The evidence, including ŠEŠELJ's wartime statements, proves that "Kameni" was member of the SRS. In court, RANKIĆ agreed with ŠEŠELJ that "Kameni" was not a member of the SRS during the war.¹⁹³⁵

¹⁹²⁹ Rankić, Exh.P01074, para 69(public). See paras.156-165 above.

¹⁹³⁰ Rankić, Exh.P01074, para.37 (public); Exh.P01075, para.20 (public). See paras.179,187-189,191,193,292,342-344 above.

¹⁹³¹ Petković, Exh.C00013, pp.26-27 (public); Exh.C00018, para.17 (public); Glamočanin, Exh.P00688, paras.28-29, 36 56, 59, 94, 97 (public); Rankić, Exh.P01074, para.19, (BCS) p.38 (public); [REDACTED]..

¹⁹³² VS-033, T.5512-5513 (open); Petković, Exh.C00011, p.6 (public); Exh.C00013, pp.62, 64-66 (public); Exh.C00018, paras.31,34 (public); Rankić, Exh.P01074, paras.34-35 (public).

¹⁹³³ Petković, Exh.C00018, para.46 (public); Stoparić, T.2332-2334(open); Rankić, Exh.P01074, paras.32 and 125 (public). See also [REDACTED]; VS-033, T.5532(open), [REDACTED]; Glamočanin, Exh.P00688, para.50 (public) (ŠEŠELJ received intelligence from Chetnik commanders in the field).

¹⁹³⁴ Rankić, Exh.P01074, paras.28,57,84 (public); Exh.P01075, para.13(public); Petković, Exh.C00018, paras.19,28 (public); Exh.C00013, pp.37, 42, 47, 56 (public); Exh.C00018, para.19 (public); Exh.C00014, p.47 (public).

¹⁹³⁵ Rankić, Exh.P01074, paras.33, 124,125 (public); Exh.P00185 (public); Exh.P00217, no.10 (public), Rankić, T.16072(public); Exh.P01074 para.74(public); Exh.P00185, p.1 (public); VS-004, T.3429-3435 (open); Exh.P00288, p.1 (public); T.5075-5077 (open); Exh.P00255, p.2-3 (public); Theunens,T.4346-4349 (open). ŠEŠELJ has testified that Kameni was affiliated with the Vukovar TO, but joined the SRS during the war when SRS volunteers were placed under his command, Šešelj, Exh.P00031, pp.627, 629 (public). Petković, Exh.C00016, pp.20-21(public); Exh.C00015, pp.41-42 (public). See paras.115,137,143,144,146 above.

- The evidence proves that the Serbian Ministry for Relation with Serbs Outside Serbia was involved in Volunteer deployment and provisions. In testimony, RANKIĆ agreed with ŠEŠELJ that it was just a refugee organization.¹⁹³⁶
- The evidence proves that the Serb Ministry of Defence provided Serb forces, including Šešeljevci with weapons, helicopter transport and other significant support.¹⁹³⁷ In testimony, RANKIĆ agreed with ŠEŠELJ that the Ministry had no resources to assist with deployment of volunteers or other military matters.¹⁹³⁸

(b) Nebojša STOJANOVIĆ (Recanting Witness)

658. Much of the key evidence STOJANOVIĆ provided in written statements is corroborated, for example:

- Šešeljevci were trained at “Arkan”’s camp in Erdut.¹⁹³⁹
- Before volunteers embarked for the front, ŠEŠELJ told them: “Be heroes, kill the Ustasha, fight for a Greater Serbia”.¹⁹⁴⁰
- ŠEŠELJ visited his men in the field, including in and around municipalities named in the Indictment.¹⁹⁴¹
- “Arkan” and his men destroyed a Catholic church in Erdut.¹⁹⁴²

659. STOJANOVIĆ’s recantation contains statements directly contradicted by the credible evidence. For example:

¹⁹³⁶ Rankić, T.16014 (open). *But see*, Petković, Exh.C00018, paras.19,28 (public); Exh.C00013, pp.37,42, 47, 56 (public); Exh.C00018, para.19 (public); Exh.C00014, p.47(public); [REDACTED].

¹⁹³⁷ Exh.P00132, p.1(public); Babić, Exh.P01137, p.83-86 (public); Exh.P00932, pp.1-2(public); Exh.P00946 (public); Exh.P00983 (public). *See* paras.77, 85, 90 above.

¹⁹³⁸ Rankić, T.16015 (open).

¹⁹³⁹ Stojanović, Exh.P00526 paras.18-19(public); Exh.P00527 para.17(public); Exh.P00528, paras.30-31(public); Petković, Exh.C00018, para.38 (public); Rankić, Exh.P01074, para.85(public).

¹⁹⁴⁰ Rankić, Exh.P01074, para.36(public); Stojanović, Exh.P00528, paras.31-32 (public); Dražilović, Exh.C00010, para.28 (public). *See* para.46 above.

¹⁹⁴¹ Rankić, Exh.P01074, paras.64-76 (public); Stojanović, Exh.P00528, paras.30-32 (public); Šešelj, Exh.P00031, p.500 (public); Dražilović, Exh.C00010, paras.37, 58(public); [REDACTED]. *See* paras.49,156,260,272-273 above.

¹⁹⁴² Stojanović, Exh.P00526 para.12(public); Exh.P00528 para.24. Exh.P00921, p.1 (public).

- The evidence proves **Šešeljević** had already been deployed in SBWS by May 1991.¹⁹⁴³ In testimony, STOJANOVIĆ dismissed **ŠEŠELJ**'s May 1991 admission that **Šešeljević** were defending Serbian land as "party propaganda".¹⁹⁴⁴
- Evidence proves that **ŠEŠELJ** was in Vukovar in November 1991 and that **Šešeljević** were a well known presence there.¹⁹⁴⁵ In contradiction of his written statement, in testimony, STOJANOVIĆ denied seeing **ŠEŠELJ** there and denied that the volunteers, including "Kameni" who he claimed never to have met though Kameni was his commander, were **Šešeljević**.¹⁹⁴⁶

(c) Nenad JOVIĆ (Recanting Witness)

660. Much of the key evidence JOVIĆ provided in written statements is corroborated, for example:

- **ŠEŠELJ** was viewed as the commander of **Šešeljević** units.¹⁹⁴⁷
- JCE member Radmilo BOGDANOVIĆ provided weapons to Serbs in Zvornik.¹⁹⁴⁸
- The Muslims were willing to agree to a JNA guaranteed peace accord in Zvornik and accept a separation of Serb and Muslim areas until the attack on Zvornik began.¹⁹⁴⁹
- Branko POPOVIĆ assumed the name Marko PAVLOVIĆ in Zvornik, where he assisted in implementing the JCE.¹⁹⁵⁰

¹⁹⁴³ E.g. Exh.P00644, p.5 (public); Exh.P01277, pp.1-2 (public).

¹⁹⁴⁴ Stojanović, T.9702 (open).

¹⁹⁴⁵ See paras.154-167 above.

¹⁹⁴⁶ Stojanović, T.9683-9692 (open).

¹⁹⁴⁷ Jović, Exh.P01077, paras.13-14 (public); [REDACTED]; VS-002, T.6557 (open) (ŠEŠELJ "was a vojvoda, we would not have refused his order"); [REDACTED]; Džafić, Exh.P00840, para.20 (public) ("In a broader sense [Vaske's unit] was under Šešelj's command"); Rankić, Exh.P01074, para.70 (public); Exh.P01076, p.26 (public). See paras.46-47 above.

¹⁹⁴⁸ [REDACTED]. See para.225 above.

¹⁹⁴⁹ [REDACTED]; VS-2000, T.13999-14000, 14007-14017 (open); Alić, T.6994-7001 (open). See para.288 above

¹⁹⁵⁰ Jović, Exhs.P01077, para.52 (public); [REDACTED]; Rankić, Exh.P01074, para.41 (public).

661. JOVIĆ's recantation contains statements directly contradicted by the credible evidence. For example:

- Evidence, including ŠEŠELJ's own wartime statements proves that ŠEŠELJ cooperated with MILOŠEVIĆ during the conflict.¹⁹⁵¹ In testimony, JOVIĆ claimed that ŠEŠELJ and MILOŠEVIĆ always had an "extremely bad" relationship.¹⁹⁵²
- Evidence proves that ŠEŠELJ and "Arkan" reconciled during the conflict¹⁹⁵³ and that there was significant cooperation between them and their respective units.¹⁹⁵⁴ In testimony, JOVIĆ claimed that there was no co-operation between ŠEŠELJ and "Arkan".¹⁹⁵⁵
- Evidence proves that KOSTIĆ was a senior official in MUP Serbia,¹⁹⁵⁶ in testimony, JOVIĆ claimed he was affiliated with the RSK.¹⁹⁵⁷

(d) Jovan GLAMOČANIN (Recanting Witness)

662. Much of the key evidence GLAMOČANIN provided in written statements is corroborated, for example:

663. The facts contained in GLAMOČANIN's written statements are corroborated by other evidence.¹⁹⁵⁸ For example:

- If anyone disagreed with ŠEŠELJ they would be threatened with expulsion or actually expelled from the party.¹⁹⁵⁹
- ŠEŠELJ and the War Staff maintained close contact with volunteers in the field¹⁹⁶⁰.

¹⁹⁵¹ Tomić, T.3113-3114 (open). *E.g.* Exh.P00644, pp.4-5 (public); Exh.P00090, p.6 (public). *See also*, Exh.P00344, p.1 (public); Exh.P00347 (public).

¹⁹⁵² Jović, T.16211, 16243-44 (open).

¹⁹⁵³ Exh.P01249, p.12(public); Exh.P01247 p.5 (public).

¹⁹⁵⁴ Exh.P01323, pp.4-6 (public); Exh.P00921 (public); Stojanović, Exh.P00528 para. 30 (public); Petković, Exh.C00018, para.38 (public); Rankić, Exh.P01074, para.85(public).

¹⁹⁵⁵ Jović, T.16218 (open).

¹⁹⁵⁶ VS-037, [REDACTED], 14912 (open); [REDACTED]; Exh.P00131, pp.6-7 (public).

¹⁹⁵⁷ Jović, T.16244-16246 (open).

¹⁹⁵⁸ Glamočanin, Exh.P00688 (public).

¹⁹⁵⁹ Glamočanin, Exh.P00688, paras.95-96 (public); Rankić, Exh.P01076, p.5 (public). *See* para.39 above.

- **ŠEŠELJ** was an autocrat and had complete control over the SRS/SČP and the War Staff.¹⁹⁶¹

664. GLAMOČANIN's recantation contains statements directly contradicted by the credible evidence. For example:

- Evidence proves that the SRS was one party throughout the SFRY.¹⁹⁶² In testimony, GLAMOČANIN claimed that SRS branches, including in BiH, acted independently.¹⁹⁶³
- Documentary evidence proves a large number of **Šešeljevi** units were deployed throughout the conflict.¹⁹⁶⁴ GLAMOČANIN testified there were no units during the conflict.¹⁹⁶⁵
- Evidence proves ARKAN trained **Šešeljevi** pursuant to an agreement between **ŠEŠELJ** and "Arkan".¹⁹⁶⁶ GLAMOČANIN testified that there was no cooperation between the SRS and "Arkan".¹⁹⁶⁷

(e) Vojislav DABIĆ (Recanting Witness)

665. [REDACTED]:

- [REDACTED].¹⁹⁶⁸
- [REDACTED].¹⁹⁶⁹
- [REDACTED].¹⁹⁷⁰

¹⁹⁶⁰ Glamočanin, Exh.P00688, para.50 (public); VS-033, T.5530-5531 (open); Dražilović, Exh.C00010, para.44 (public); Rankić, Exh.P01074, para.32, 125 (public).

¹⁹⁶¹ Glamočanin, Exh.P00688, paras.28-29, 35, 56, 59, 94, 97 (public); Petković, Exh.C00013, p.27 (public); Exh.C00018, para.17 (public); Rankić, Exh.P01074, para.19 (public); [REDACTED].

¹⁹⁶² Exh.P01001, p.1 (public); *see* Exhs.P01219, p.8 (public), P01204 (public); P01199, p.3 (public).

¹⁹⁶³ Glamočanin, T.12837, 12862 (open).

¹⁹⁶⁴ *E.g.* [REDACTED]

¹⁹⁶⁵ Glamočanin, T.12888-12890 (open).

¹⁹⁶⁶ Stojanović, Exh.P00526, paras.18-19 (public); Exh.P00527, para.17 (public); Exh.P00528, paras.30-32 (public); Petković, Exh.C00018, para.38 (public); Rankić, Exh.P01074, para.85 (public).

¹⁹⁶⁷ Glamočanin T.12968-69 (open).

¹⁹⁶⁸ Karišik, T.8779, 8780, 8783 (open); VS-1067, T.15292-15293 (open); [REDACTED]. *See* paras.453-457 above.

¹⁹⁶⁹ Kujan, Exh.P00524, p.6 (public); [REDACTED].

666. DABIĆ's recantation contains statements directly contradicted by the credible evidence. For example:

- Evidence proves, [REDACTED] that Šešeljevi were a large presence in Nevesinje.¹⁹⁷¹ DABIĆ testified that never saw any ŠEŠELJ's men in Nevesinje.¹⁹⁷²
- [REDACTED].¹⁹⁷³ DABIĆ testified that volunteers in Mostar came on their own, without anyone's knowledge.¹⁹⁷⁴
- Evidence proves extensive coordination between Šešeljevi and the TO, DABIĆ testified there was "practically no co-ordination" between them.¹⁹⁷⁵
- The Karadorde unit wore the Chetnik insignia and cockades but they were SPO and there was no SRS in Eastern Herzegovina at the time.¹⁹⁷⁶ In fact, Šešeljevi were in this unit and the SRS was in the region.

(f) Aleksandar STEFANOVIĆ (Partially Recanting Witness)

667. Much of the key evidence STEFANOVIĆ provided in written statements is corroborated, for example:

- Petković and ŠEŠELJ's contacts with MUP Serbia (including the detail that they issued PETKOVIĆ a car), and STANISIĆ.¹⁹⁷⁷
- Contacts between the SRS/SČP War Staff and the JNA General Staff, including DOMAŽETOVIĆ.¹⁹⁷⁸

¹⁹⁷⁰ Kujan, Exh.P00524, p.3 (public); [REDACTED]. See para.477-478 above.

¹⁹⁷¹ See paras.264-269 above.

¹⁹⁷² T.15204-15205 (open).

¹⁹⁷³ [REDACTED].

¹⁹⁷⁴ Dabić, T.15132 (open).

¹⁹⁷⁵ Dabić, T.15133 (open).

¹⁹⁷⁶ Dabić, T.15116, 15131 (open).

¹⁹⁷⁷ Stefanović, Exh. P00633, p.11 (public); Exh.P00634, paras.20-21 (public); Petković, Exh.C00012, para.7 (public); Petković, Exh.C00015, p.9 (public).

¹⁹⁷⁸ Stefanović, Exh.P00634, para.21 (public); Petković, Exh.C00013, p.50 (public); [REDACTED].

- ŠEŠELJ toured Eastern Slavonia in March 1991, including Borovo Selo. MUP Serbia had organized for volunteers from the SČP, SNO and SPO there on May 1, 1991.¹⁹⁷⁹
- The SRS/SČP Volunteers units were “men of poor quality.”¹⁹⁸⁰
- SRS Volunteers equipped and trained at Bubanj Potok.¹⁹⁸¹

668. STEFANOVIĆ’s partial recantation (by video link) was remarkable for his affirmation of his statements where they did not implicate ŠEŠELJ and his denial of any fact implicating ŠEŠELJ, even where such denial was directly contradicted by other evidence. For example,

- Evidence proves that the SRS War Staff recruited volunteers.¹⁹⁸² STEFANOVIĆ insisted that the SRS War Staff did not recruit volunteers.¹⁹⁸³
- The original documents show that STEFANOVIĆ signed his statements, while in testimony he insisted that his signature had been scanned and copied onto the document.¹⁹⁸⁴

(g) VS-037 (Partially Recanting Witness)

669. Much of the key evidence VS-037 provided in written statements is corroborated, for example:

¹⁹⁷⁹ Stefanović, Exh.P00633, p.6 (public); Exh.P01277 (public); Exh.P00644 pp.9, 28 (public); [REDACTED].

¹⁹⁸⁰ Stefanović, Exh.P00634, para.15 (public). *E.g.* [REDACTED].

¹⁹⁸¹ Stefanović, Exh.P00634, para.21 (public); Exh.P00299 (public); Petković, Exh.C00014, pp.45-50 (public); Exh.C00018, paras.21, 24 (public); Exh.C00012, paras.5,19 (public); Exh.P00030, p.1 (public).

¹⁹⁸² Stefanović, Exh.P00634, paras.15-17 (public); Exh.P00633, pp.5-8,11 (public); Exh.P00644 (public); Exh.P00346, p.1 (public); T.5784-5785, (open); Exh.P00391, p.1 (public), Exh.P00392, p.1 (public); [REDACTED]; Exh.P00997, pp.1-2 (public); Petković, Exh.C00011, pp.5, 7 (public); Petković, Exh.C00013, pp.22, 58-60, 65 (public); Petković, Exh.C00016, p.89 (public); Exh.C00012 para.18 (public); [REDACTED]; Exh.P00030, p.1 (public).

¹⁹⁸³ Stefanović, T.12118-12121 (open). Stefanović, Exh.P00634, paras.15-17 (public); Exh.P00633, pp.5-8,11 (public); Exh.P00644 (public); Exh.P00346, p.1 (public), T.5784-5785, (open); Exh.P00391, p.1 (public), Exh.P00392, p.1 (public); [REDACTED]; Exh.P00997, pp.1-2 (public); Petković, Exh.C00011, pp.5, 7 (public); Petković, Exh.C00013, pp.22, 58-60, 65 (public); Petković, Exh.C00016, p.89 (public); Exh.C00012 para.18 (public); [REDACTED]; Exh.P00030, p.1 (public).

¹⁹⁸⁴ Stefanović, T.12249-12252 (public). Similarly savy and educated Jovan Glamočanin, a lawyer, insisted that the 2003 OTP statement he had signed was never translated for him and that he had attested to its contents under pressure. Glamočanin, T.12893-12894 (public).

- Evidence of numerous crimes perpetrated against Muslims in Zvornik in May 1992, particularly in and around Karakaj Technical School, including the large number of detainees held there.¹⁹⁸⁵
- Crimes committed against Muslims in Kozluk and the perpetrators.¹⁹⁸⁶
- Republican authorities supported, facilitated and coordinated various volunteer and paramilitary groups which were deployed in conflict areas, including **Šešeljević**.¹⁹⁸⁷

670. VS-037's partial recantation was remarkable for his affirmation of his statements where they did not implicate **ŠEŠELJ** and his denial of any fact implicating **ŠEŠELJ**, even where such denial was directly contradicted by other evidence. For example, VS-037:

- Evidence proves that **ŠEŠELJ** was cooperating with other JCE members by the fall of 1991 and was able to ensure **Šešeljević** were armed. [REDACTED] in the fall of 1991, **ŠEŠELJ** had no relationship to the government, including **MILOŠEVIĆ**, and no access to weapons.¹⁹⁸⁸
- Evidence proves that Arkan led the attack on Zvornik. In testimony, VS-037 denied "Arkan"'s involvement in Zvornik, saying he was only there twice for three hours total.¹⁹⁸⁹
- Evidence proves **Šešeljević** organized by **ŠEŠELJ** were sent to Zvornik. VS-037 testified that volunteers other than Arkan's men came on their own.¹⁹⁹⁰

¹⁹⁸⁵ [REDACTED]; Exh.P00821 (public); [REDACTED].

¹⁹⁸⁶ [REDACTED]. Banjanović, T.12428, 12432-12434, 12438-12441, 12446-12450, 12452-12453, 12459-12460, 12464,12471-12472,12479-12482 (open); Exh.P00663 (public); Exh.P00666 (public). See also Exh.P00667 (public); See also Exh.P01347, pp.4-5 (public). See para.307 above.

¹⁹⁸⁷ Exh.P00030, p.1 (public)(Milošević and Bogdanović gave **ŠEŠELJ**'s men uniforms, buses, guns, etc.); Exh.P00063, p.1 (public) (Milošević gave **ŠEŠELJ**'s men weapons, uniforms, buses); Exh.P00065, p.1 (public)(Milošević and Bogdanović gave **ŠEŠELJ**'s men uniforms, guns, etc.); Exh.P00132, p.1-3 (public)(Arkan and local Serb TOs in SBWS were armed by MUP); Exh.P00644, p.5 (public)(Milošević and Bogdanović gave **ŠEŠELJ**'s men uniforms, guns, etc); Exh.P00644, pp.10-11 (Milošević and Bogdanović armed the Borovo Selo TO through Šoškočanin); Exh.P00976, p.1 (public)(a unit of Arkan's men were given uniforms by MUP under Badža); VS-037, T.14905 (open) (Rade KOSTIĆ from State Security Service ran training of volunteers in Darda, Croatia).

¹⁹⁸⁸ See paras.145, 62 above. [REDACTED].

¹⁹⁸⁹ E.g. para.283 above. But see VS-037, T.14995, 14997-14998, 15025 (open).

¹⁹⁹⁰ E.g. para.252 above. But see VS-037, T.14938-14939 (open); [REDACTED].

GLOSSARY, *DRAMATIS PERSONAE* AND DEFINED TERMS*Pleadings, Orders, Decisions etc. from Prosecutor v. Vojislav Šešelj, Case No. IT-03-67-T*

AFI	Decision on the Prosecution Motion to Take Judicial Notice of Facts Under Rule 94(B) of the Rules of Procedure and Evidence, 10-Dec-2007
AFII	Decision on Prosecution Motions to Take Judicial Notice of Facts Concerning the <i>Mrkšić</i> case, 8-Feb-2010, Annex A
AFIII	Decision on Prosecution Motions to Take Judicial Notice of Facts Concerning the <i>Mrkšić</i> case, 8-Feb-2010, Annex B
AFIV	Decision on Prosecution Motion for Judicial Notice of Facts Adjudicated by <i>Krajišnik</i> case, 23-Jul-2010
Decisions Admitting Written Statements of Recanting and Non-Appearing Witnesses	<u>Stefanović (VS-009)</u> , Decision on Admission of Evidence Presented During Testimony of Aleksander Stefanović (Public), 12-Mar-2009, Exh.P00633 (public) (Statement dated 12-Feb-2003); Exh.P00634 (public) (Statement dated 16-Jun-2006); (Exh.P00656 (Public) (Original Signed Statement dated 16-Jun-2006)). <u>Dražilović (VS-010)</u> , [REDACTED]: C00010 (Public) (Statement 1-Apr-2003). <u>Petković (VS-011)</u> , Decision Admitting the Prior Statements of VS-011 Pursuant to Rule 92quater of the Rules (public) 6-Nov-2008, C00011 (Public) (Statement dated 18-Dec-2002); C00012 (Public) (Statement 13-Feb-2003); C00018 (Public) (Statement 18-Jun-2006). <u>Rankić (VS-017)</u> , T.16002: 89(F) Statement of Zoran Rankić dated 19-Sept-2006 (Exh.P01074 (Public)); Addendum to 89(F) statement dated 18-Oct-2006 (Exh.P01075 (Public)); and Second Addendum to 89(F) Statement dated 10-Nov-2006 (Exh.P01076 (Public)). [REDACTED]. <u>Dabić (VS-029)</u> , Oral Decision, 27-Jan-2010: [REDACTED]. <u>Jović (VS-032)</u> , Statement 28-Sept-2003 (Exh.P01077 (Public)); [REDACTED]; Statement 1-Oct-2007 (Exh.P01079 (Public)). [REDACTED]. <u>Glamočanin (VS-044)</u> , Oral Decision, 16-Jun-2009: Exh.P00688 (Public) (Statement 30-May-2003). <u>Stojanović (VS-048)</u> , Decision on the Prosecution's Oral Motion Seeking the Admission into Evidence of Nebojša Stojanović's Three Statements (public), 11 September 2008, Exh.P00526 (Public) (Statement dated 18-Aug-2004); Exh.P00527 (Public) (Statement dated 17-Nov-2004); Exh.P00528 (Public) (Statement dated 21-Jun-2006).
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[REDACTED]	[REDACTED]

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<i>Ruggiu</i> SJ	<i>Prosecutor v. Georges Ruggiu</i> , Case No. ICTR-97-32-I, T.Ch., Sentencing Judgement, 1 June 2000
<i>Rwamakuba</i> AD	<i>Prosecutor v. André Rwamakuba</i> , Case No. ICTR-98-44-AR72.4, Decision on Interlocutory Appeal Regarding Application of Joint Criminal Enterprise to Crime of Genocide, 22 October 2004.
<i>Seromba</i> AJ	<i>Prosecutor v. Athanase Seromba</i> , Case No. ICTR-2001-66-A, App.Ch., Judgement, 12 March 2008

SCSL Authorities

<i>Sesay</i> TJ	<i>Prosecutor v. Issa Sesay et al.</i> , Case No. SCSL-04-15-T, T.Ch., Judgement, 2 March 2009
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Other Abbreviations

Art.	Article
BBC	British Broadcasting Corporation
BiH	Bosnia and Herzegovina
DB Serbia	State Security Service of the Republic of Serbia
ECMM	European Community Monitoring Missions
Exh.	Exhibit
ICTR	International Criminal Tribunal for Rwanda
ICTY	International Criminal Tribunal for the former Yugoslavia
JCE	Joint Criminal Enterprise
JNA	Yugoslav People's Army
MUP	Ministry of the Interior / Police
MUP Serbia	Ministry of Interior/Police of the Republic of Serbia
OG	Operational Groups
para.	Paragraph
paras.	Paragraphs
p.	Page
pp.	Pages
RS	Serbian Republic of Bosnia and Herzegovina, later renamed <i>Republika Srpska</i>
RSK	Republic of Serbian Krajina
SAO	<i>Srpska Automna Oblast</i> ("Serbian Autonomous Region")
SČP	Serbian Chetnik Movement
SDS	Serbian Democratic Party
SFRY	Socialist Federal Republic of Yugoslavia
SPS	Socialist Party of Serbia
SRS	Serb Radical Party (<i>Srpska Radikalna Stranka</i>)
Statute	Statute of the International Criminal Tribunal for the Former Yugoslavia established by the Security Council Resolution 827 (1993)
SUP	Secretariat of Internal Affairs (Sekretarijat unutrašnjih poslova)
TO	Territorial Defence
UN	United Nations
Variant A&B	<i>Instructions for Organization and Activity of Organs of the Serbian People in BiH in a State of Emergency</i> , issued 19 December 1991
VJ	Army of the Federal Republic of Yugoslavia (this came into existence after the JNA in BiH became the VRS)

VRS	Bosnian Serb Army
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ANNEX A

PERSECUTIONS – COUNT 1

For persecution charged in paragraph 17(a) and 17(d) of the Indictment, see Annex B.1; B.2; B.3(a) through (d); B.4; B.5; Annex C.1; C.2; C.3(a), (b) and (c); C.4; C.5. For persecution charged in paragraphs 17(b) and (c), see Annex C.1; C.2; C.3 (a) and (b); C.4; C.5. For persecution charged in paragraph 17(i) of the Indictment, see Annex D.1; D.2; Annex D.3 (a) through (d); D.5; D.6. For persecution charged in paragraph 17(j) of the Indictment, see Annex E.1; E.2; E.3; E.4; E.5.

Throughout the Indictment period, the following acts of persecution were committed.

Forced Labour (Indictment, para. 17(e))

#	Incident	Perpetrator(s)
1.	Forced labour at Ciglana Factory, Zvornik ¹	Šešeljević, including Major Toro, Zoks, Pufta and Savo and Loznica Group; ² Niški. ³
2.	Forced labour in Grbavica, Greater Sarajevo ⁴	Serb forces including VRS and Slavko ALEKSIĆ's Šešeljević ⁵
3.	Forced labour in Vogošća, Greater Sarajevo ⁶	VRS/TO members including Dragan JOSIPOVIĆ, Rajko JANKOVIĆ and Nedjo DJUKIĆ ⁷
4.	Forced labour from Planja's house, Vogošća, Greater Sarajevo ⁸	Serb forces including Vogošća War Commission headed by Šešeljevac Nikola POPLAŠEN, ⁹ Šešeljevac Vasilje VIDOVIĆ aka VASKE, ¹⁰ VRS including Branko VLAČO and Nejboša ŠPIRIĆ ¹¹
5.	Forced labour at the car repair workshop in Ilijaš, Greater Sarajevo ¹²	Ilijaš Crisis Staff and Šešeljevac Vasilije VIDOVIĆ aka Vaske ¹³
6.	Forced labour in Luka settlement, Mostar ¹⁴	Milan ŠKORO ¹⁵ ; Serb soldiers ¹⁶
7.	[REDACTED] and others forced to transport corpses at	Two "Chetniks" ¹⁸

¹ VS-1013, T.5240-5248, 5242; Exh.P00362, pp.7-8; VS-1015, T.5405, 5429-5435.

² VS-1015, T.5430-5435; Exh.P00362, p.8.

³ Exh.P00362, p.7.

⁴ VS-1060, T.8582-8588, 8611-8614, 8630.

⁵ VS-1060, T.8583-8588.

⁶ Sejdić, T. 8173-8177, 8209-8210, 8199-8203, 8361-8362.

⁷ Sejdić, T.8216-8217, 8346, 8201-8202.

⁸ VS-1055, T.7839-7842; Exh.P00464; [REDACTED]; Sejdić, T.8202-8203.

⁹ [REDACTED].

¹⁰ VS-1055, T.7842, 7832-7833; Sejdić, T.8210-8211, 8173.

¹¹ VS-1055, T.7839, 7841; Sejdić, T.8207-8208; Exh.P00464.

¹² Exh.P00840, paras.4, 6-7, 25-28, 32-33.

¹³ Exh.P00840, paras.4, 33.

¹⁴ [REDACTED]; See Bilić T.8961.

¹⁵ [REDACTED]; Karišik, T.8757-8768.

¹⁶ [REDACTED]; Karišik, T.8767-8768.

	Sutina, Mostar ¹⁷	
8.	Forced labour at Zijemlje primary school, Nevesinje, including cleaning up blood from prisoner abuse ¹⁹	Serb soldiers ²⁰

Sexual Assault in detention facilities (Indictment para. 17(f))

#	Incident	Perpetrator(s)
1.	Detainees forced to sexually assault each other at Čelopek Dom Kulture, Zvornik ²¹	Member of Zok's group Buco; ²² Šešeljevac Dušan VUČKOVIĆ aka Repić ²³
2.	Interrogation, assault, and repeated rapes of [REDACTED] at Boračko Jezero, Nevesinje ²⁴	Petar DIVJAKOVIC, Arsen GRAHOVAC and "Chetniks" ²⁵
3.	Rape of [REDACTED] at Boračko Jezero, Nevesinje ²⁶	Member of the Karadorde unit with a wooden cross ²⁷ , Radivoj SALDO and others ²⁸
4.	Sexual abuse of [REDACTED] ²⁹ and [REDACTED] ³⁰ at Zijemlje primary school, Nevesinje	10 -12 Serb soldiers in various uniforms, including White Eagles, some in sajka caps with cockades, some armed. ³¹ [REDACTED]. ³²

Torture, beating and robbing (Indictment para. 17(h))

#	Incident	Perpetrator(s)
1.	Karlović taken at gun point to a house in Petrova Gora, Vukovar. Forced to sing Chetnik songs, spat on, cursed, beaten, burned on his ear, hand and nipples,	Šešeljevci, including "Belgija," "Cedo", "Darca/Arca", "Smiljan/Miljan", ³⁴

¹⁷ [REDACTED].

¹⁸ [REDACTED].

¹⁹ [REDACTED].

²⁰ [REDACTED].

²¹ [REDACTED], T.6330-6331; [REDACTED].

²² [REDACTED]; T.6322.

²³ [REDACTED], T.6330.

²⁴ [REDACTED].

²⁵ [REDACTED].

²⁶ [REDACTED].

²⁷ [REDACTED].

²⁸ [REDACTED].

²⁹ [REDACTED].

³⁰ [REDACTED].

³¹ [REDACTED].

³² [REDACTED].

	threatened with rape and castration ³³	
2.	Vukovar, 20 year old Non-Serb girl held prisoner in a house, raped and then thrown into a well. ³⁵	Topola ³⁶
3.	[REDACTED] kept in a smoke house in Vukovar and beaten till he bled ³⁷	JNA Reservists ³⁸
4.	Robbing of non-Serbs assembled in Klisa, Zvornik ³⁹	Serb forces including VRS, police, and paramilitaries ⁴⁰
5.	Torture, mistreatment and robbing of non-Serbs in Kozluk, Zvornik ⁴¹	Serb forces including Serb TO, Arkan's men under PEJIĆ, Niški and Captain Dragan, Šešeljević including PIVARSKI and Yellow Wasps,. ⁴²
6.	Robbing of detainees at Ekonomija Farm, Zvornik ⁴³	Šešeljević including Saša and Pivarski ⁴⁴
7.	Robbing of detainees at Karakaj Technical school, Zvornik ⁴⁵	Serb forces including men in military camouflage, ⁴⁶ JNA, ⁴⁷ and police uniforms; ⁴⁸ Serb TO or police reservists ⁴⁹
8.	Robbing of detainees at Čelopek Dom Kulture, Zvornik ⁵⁰	Serb soldiers in military uniform; ⁵¹ Šešeljević including Zoks, Major; ⁵² Repić ⁵³
9.	Beating and robbing of non-Serbs in Lješevo, Ilijaš, Greater Sarajevo ⁵⁴	Members of the Ilijaš TO, including Marinko VIDOVIĆ, Pero VUJOVIĆ and Ranko DRAŠKIĆ; Savo MANOJLOVIĆ ⁵⁵
10.	Beating of non-Serb in	Member of the VRS Nejboša ŠPIRIĆ; ⁵⁷ members

³³ Karlović, T.4742-4747.

³⁴ Karlović, T.4742-4747.

³⁵ Stoparić, T.2347-2350.

³⁶ Stoparić, T.2347-2350.

³⁷ [REDACTED].

³⁸ [REDACTED].

³⁹ [REDACTED].

⁴⁰ [REDACTED].

⁴¹ Banjanović, T.12448, 12464.

⁴² Banjanović, T.12428, T.12433-12434, 12476.

⁴³ VS-1015, T.5402-5404.

⁴⁴ VS-1015, T.5402-5404.

⁴⁵ VS-1012, T.8452-8453; [REDACTED].

⁴⁶ [REDACTED].

⁴⁷ [REDACTED].

⁴⁸ [REDACTED].

⁴⁹ [REDACTED].

⁵⁰ VS-1065, T.6312-6314, 6318, 6320-6321.

⁵¹ VS-1065, T.6313.

⁵² VS-1065, T.6318.

⁵³ VS-1065, T.6320.

⁵⁴ [REDACTED]; VS-1055, T.7820-7821.

⁵⁵ [REDACTED]

	Vogošća, Greater Sarajevo ⁵⁶	of Serb police ⁵⁸
11.	Beating and killing of a Croat near the National Theatre in Mostar ⁵⁹	Šešeljević, soldiers from the JNA ⁶⁰
12.	[REDACTED] beaten and murdered in Mostar ⁶¹	[REDACTED], ⁶² [REDACTED] ⁶³

Imposition of restrictive and discriminatory measures (Indictment para. 17(g) and (h))

#	Incident	Perpetrator(s)
1.	Vukovar, Topola took two prisoners out of Velepomet and brought them as presents to the host of the patron saints day celebration. He killed one on the way and mistreated the other once at the house. ⁶⁴	Topola ⁶⁵
2.	Vukovar, 20 year old Non-Serb girl held prisoner in a house. ⁶⁶	Topola ⁶⁷
3.	Vukovar, Čakalić and Berghofer kept imprisoned at Modateks. They were slapped, spit on and threatened that Topola would slit their throats. ⁶⁸ Elderly people, women and children kept at Modateks ⁶⁹ Karlović imprisoned at Modateks. ⁷⁰	JNA soldiers, ⁷¹ Sladjana Korda ⁷² Šešeljević, including Topola ⁷³

⁵⁶ Sejdić, T.8169-8172, 8240.

⁵⁷ Sejdić, T.8170, 8407-8408.

⁵⁸ Sejdić, T.8171-8172.

⁵⁹ [REDACTED]. See also VS-1067, T.15370; Dabić, T.15211.

⁶⁰ [REDACTED]. See also VS-1067, T.15370; Dabić, T.15211.

⁶¹ [REDACTED].

⁶² [REDACTED].

⁶³ [REDACTED].

⁶⁴ Stoparić, T.2344-2346.

⁶⁵ Stoparić, T.2344-2346.

⁶⁶ Stoparić, T.2347-2350.

⁶⁷ Stoparić, T.2347-2350.

⁶⁸ Čakalić, T.4945-4947.

⁶⁹ Karlović, T.4733.

⁷⁰ Karlović, T.4733-4735.

⁷¹ Čakalić, T.4945-4947; Karlović, 4735.

⁷² Čakalić, T.4945-4947; Karlović, 4735.

4.	Albanian woman kept in house in Bogdanovci, Vukovar, for twelve hours and raped repeatedly by several soldiers. ⁷⁴	Serb forces ⁷⁵
5.	Prohibition of selling property to non-Serbs in Zvornik ⁷⁶	Serb Municipality of Zvornik ⁷⁷
6.	Restriction of movement in Zvornik ⁷⁸	Serb police ⁷⁹
7.	Establishment of lists of non-Serbs to be captured during attack in Zvornik ⁸⁰	Arkan's men ⁸¹
8.	Restriction of movement of non-Serbs in Kozluk, Zvornik ⁸²	Marko PEJIĆ, Arkan's deputy and Serb Crisis Staff ⁸³
9.	Appropriation of non-Serb property in Zvornik ⁸⁴	Serb Municipality of Zvornik ⁸⁵
10.	Arbitrary searches and looting of houses in Grbavica, Greater Sarajevo ⁸⁶	Serb forces including JNA/VRS, Šešeljević led by Slavko ALEKSIĆ, Serb TO, Serb municipal authorities ⁸⁷
11.	Dismissal on non-Serbs from jobs in Ilijaš, Greater Sarajevo ⁸⁸	Ilijaš SDS Crisis Staff ⁸⁹
12.	Restriction of movement in Ilijaš and Vogošća, Greater Sarajevo ⁹⁰	Serb Municipal authorities ⁹¹
13.	Appropriation on non-Serb property in Vogošća, Greater Sarajevo ⁹²	Commission headed by Brane VIČO ⁹³

⁷³ Karlović, T.4735.

⁷⁴ Exh.P00183, p.6.

⁷⁵ Exh.P00183, p.6.

⁷⁶ Exh.P00874.

⁷⁷ Exh.P00874.

⁷⁸ Alić, T.6992.

⁷⁹ Alić, T.6992.

⁸⁰ Exh.P00836, para.23.

⁸¹ Exh.P00836, para.23.

⁸² [REDACTED].

⁸³ [REDACTED].

⁸⁴ Exh.P00959, pp.9, 14, 16; [REDACTED]; AFIV-174-176.

⁸⁵ Exh.P00959, pp.9, 16; AFIV-174.

⁸⁶ VS-1060, T.8575-8579, 8582, 8599-8600, 8602-8606, 8609-8610, 8620, 8627-8628.

⁸⁷ VS-1060, T. 8573-8581, 8591, 8603.

⁸⁸ VS-1055, T.7816-7817, 7821-7825; [REDACTED].

⁸⁹ [REDACTED].

⁹⁰ VS-1055, T.7817; Exh.P00975, p.16; Sejdić, T.8172.

⁹¹ VS-1055, T.7817; Exh.P00975, p.16.

⁹² Sejdić, T.8188-8196; Exh.P00463.

⁹³ Exh.P00463.

14.	Prohibition of return of non-Serbs to Ilidža, Greater Sarajevo ⁹⁴	War Presidency headed by Nedeljko PRSTOJEVIĆ ⁹⁵
15.	Detainees confined in the Zalik shelter, Mostar, with no freedom of movement	Zalik shelter: Soldiers from Montenegro – a Serb named “Milos” and someone named Vojo PAJOVIĆ, and one Šešelevac from Novi Sad ⁹⁶
16.	Mostar, forcing men to JNA barracks, disappearance of Mirso OMANOVIĆ, other men forced to kneel overnight with their heads bowed ⁹⁷	Reservists including non-local reservists. ⁹⁸
17.	Mostar, removal of non-Serbs from positions of authority including the police ⁹⁹ and [REDACTED] ¹⁰⁰ , preclusion of non-Serbs from withdrawing their savings from local banks ¹⁰¹	Serbs; reserve police under the direction of Krsto SAVIĆ, Đuro IVKOVIĆ, FNU STAJIĆ, and Božo GRAHOVAC ¹⁰²

Direct and public denigration through “hate speech” (Indictment para. 17(k))

On 7 November in Šid, and on or about 13 November 1991 in Vukovar ŠEŠELJ directly denigrated non-Serbs through “hate speech”.¹⁰³ On 6 May 1992, in Hrtkovci, ŠEŠELJ directly denigrated non-Serbs through “hate speech”.¹⁰⁴

#	Location	Incident
1.	Vukovar	“Not a single Ustaša must leave Vukovar alive.” ¹⁰⁵ “Ustaša should be expelled.” ¹⁰⁶
2.	Šid	“This entire area will soon be cleared of the Ustašas.” ¹⁰⁷
3.	Hrtkovci	6 May 1992 speech. ¹⁰⁸

⁹⁴ Exhs.P00993; [REDACTED].

⁹⁵ Exh.P00993; [REDACTED].

⁹⁶ Bilić, T.8954-8956, 8958, 8965-8966; [REDACTED].

⁹⁷ [REDACTED]; Karišik, T.8796-8797.

⁹⁸ [REDACTED].

⁹⁹ Kujan, Exh.P00524, pp.3-4.

¹⁰⁰ [REDACTED].

¹⁰¹ Kujan, T.9641-9642; Kujan, Exh.P00524, p.4. *See also* [REDACTED].

¹⁰² Kujan, Exh.P00524, p.4.

¹⁰³ Indictment, para. 17(g).

¹⁰⁴ See Annex D.6.

¹⁰⁵ [REDACTED]; Rankić, Exh.P01074, para. 69; [REDACTED]

¹⁰⁶ [REDACTED].

¹⁰⁷ Exh.P01285.

¹⁰⁸ *E.g.* [REDACTED]; Exh.P00555; Baričević, T.10607, 10609-10, 10613-10614, 10619-10634, T.10640-10641, 10646-10648, 10695-10699, 10758-10759 (open); VS-1134, 10774-10775, 10777,

[REDACTED], 10036-10037, [REDACTED]; VS-035, T.10328, 10335, 10358-10359, [REDACTED], 10380-10385, 10391, [REDACTED]10437-10438, 10496, 10528, 10535, 10573-10575; Exh.P00550 (public) p.3; Exh.P00554; VS-067, 15425-15426, 15403-15407, 15411-15413, [REDACTED], 15480-15490, 15497-15498; Exh.P01202; Exh.P00549; Paulić, T.11903-07, 11909-11911, 11918-11919, 11932, 11953;Exh.P01203, p.6; Exh.P00565, pp.3-4, pp.9-10, pp.22-23, pp.27-30, pp.32-34; Exh.P00558; [REDACTED];Exh.P01201, p.20; Šešelj, Exh.P00031, pp.1299-1302, 1304-06; Exh.P00892; Exh.P00893, pp.21-23; Exh.P00547, pp.1-4; Exh.P01298, p.2; Exh.P01199, p.4; Exh.P00164, pp.26-27, pp.32-33, 45; Exh.P00300; [REDACTED].

ANNEX B

MURDER COUNT 4

1. Vukovar(a) Ovčara/Grabovo

The victims listed were murdered at Ovčara/Grabovo in Vukovar Municipality, on or about 20 November 1991.¹

	Victim(s)	Perpetrator(s) ¹
1.	Jozo ADŽAGA ²	Šešeljvci and other Volunteers, including Members of the Leva Supoderica and Petrova Gora Units,³ including: Pedrag DRAGOVIĆ (aka Čeča) ⁴ ; Predrag MILOJEVIĆ (aka Kinez) ⁵ ; Ljuboj MARE ⁶ ; Major KATIĆ ⁷ ; Djordje SOSIĆ (aka Žorz or Čića, Ceca) ⁸ ; Zoran DASIĆ ⁹ ; Dragica MASTIKOSA ¹⁰ ; Nikola DJUKIĆ (aka Gidza) ¹¹ ; "Topola" ¹² ; "Dragica;" ¹³ Nada KALABA ¹⁴ "Stanko," "Miroljub", "Cetinje;" ¹⁵ Nada KALABA ¹⁶ ; Spasoje PETKOVIĆ ¹⁷ TO Members¹⁸, including: Miroljub VUJOVIĆ ¹⁹ ; Stanko VUJANOVIĆ ²⁰ ; Goran MUGOŠA (aka "Kuštro") ²¹ ; Milan BULIĆ (aka Bulidza) ²² ; Mirko VOJNOVIĆ (aka Čapalo) ²³ ; Vujo ZLATAR ²⁴ ; Jovica KRESOJEVIĆ ²⁵ ; Sasa RADAK (aka Cetnje) ²⁶ ; Božo (or Boro) LATINVIĆ (or Krajisnik) ²⁷ ; "DRAČA" ²⁸ ; PERIĆ ²⁹ ; Ivica HUSNIK ³⁰ ; Stevan ZORIĆ (aka Little Zorić) ³¹ ;
2.	Ismet-Ivo AHMETOVIĆ ⁴⁵	
3.	Vinko ANDRIJANIĆ ⁴⁶	
4.	Krešimir ARNOLD ⁴⁷	
5.	Ilijia ASADANIN ⁴⁸	
6.	Dražen (Josip) BABIĆ ⁴⁹	
7.	Ivan BAINRAUCH ⁵⁰	
8.	Tomislav BAJNRAUH ⁵¹	
9.	Goran BAKETA ⁵²	

¹ Indictment, para.20, Annex III; Pre-trial Brief, para.69.

10.	Stjepan BALAS ⁵³	Pero CIGAN ³² ;
11.	Dragutin BALOG ⁵⁴	Damir SIRETA ³³ ;
12.	Josip BALOG ⁵⁵	NIKOLIĆ Slavko aka Gipsy ³⁴ ;
13.	Zvonimir BALOG ⁵⁶	Slavko CIGAN ³⁵ ;
14.	Đuro BALVANAC ⁵⁷	Mica DJANKOVIĆ ³⁶ ;
15.	Boris BANOŽIĆ ⁵⁸	Miroslav DJANKOVIĆ (aka Djani) ³⁷ ; Nada KALABA ³⁸ ;
16.	Pero BARANJAJI ⁵⁹	“Zoran from Karaburma” ³⁹
17.	Branko BARBARIĆ ⁶⁰	Reservist JNA Soldiers/Officers⁴⁰, including:
18.	Lovro BARBIRIĆ ⁶¹	Elvir HADZIC ⁴¹ ;
19.	Franjo BARIŠIĆ ⁶²	VIDACEK ⁴² ;
20.	Anđelko BARTA ⁶³	Spasoje PETKOVIĆ (aka Stuka) ⁴³ ;
21.	Željko BATARELO ⁶⁴	RADIĆ ⁴⁴
22.	Tomislav BAUMGERTNER ⁶⁵	
23.	Marko BEGČEVIĆ ⁶⁶	
24.	Željko BEGOV ⁶⁷	
25.	Stjepan BINGULA ⁶⁸	
26.	Ringo BJELANOVIĆ ⁶⁹	
27.	Zlatko BLAŽEVIĆ ⁷⁰	
28.	Ante BODROŽIĆ ⁷¹	
29.	Marko BOSAK ^{72/73}	
30.	Dragutin BOSANAC ⁷⁴	
31.	Tomislav BOSANAC ⁷⁵	
32.	Ivan BOŽAK ⁷⁶	
33.	Zvonimir BRAČIĆ ⁷⁷	
34.	Ivan BUKOVAC ⁷⁸	
35.	Ivan CRNJAC ⁷⁹	
36.	Stanoja ČUPIĆ ⁸⁰	
37.	Tihomir DALIĆ ⁸¹	
38.	Ivica DOLIŠNI ⁸²	
39.	Josip DRAGUN ⁸³	
40.	Stanko DUVNJAK ⁸⁴	
41.	Saša ĐUDAR ⁸⁵	
42.	Vladimir ĐUKIĆ ⁸⁶	
43.	Vinko- Đuro EBNER ⁸⁷	
44.	Dragutin FRISČIĆ ⁸⁸	
45.	Petar FURUNDŽIJA ⁸⁹	
46.	Robert GAJDA ⁹⁰	
47.	Milenko GALIĆ ⁹¹	
48.	Vedran GALIĆ ⁹²	
49.	Borislav GAVRANOVIĆ ⁹³	
50.	Zorislav GAŠPAR ⁹⁴	
51.	Dragan GAVRIĆ ⁹⁵	
52.	Siniša GLAVASEVIĆ ⁹⁶	
53.	Branislav GRAF ⁹⁷	
54.	Dragan GRANIĆ ⁹⁸	
55.	Milan GREJZA ⁹⁹	
56.	Zoran GRUBER ¹⁰⁰	
57.	Drago GUDELJ ¹⁰¹	

58.	Mario HEGEDUŠ ¹⁰²
59.	Željko HERCEG ¹⁰³
60.	Ivan HERMAN ¹⁰⁴
61.	Stjepan HERMAN ¹⁰⁵
62.	Nedeljko HLEVNJAK ¹⁰⁶
63.	Nikica HOLJEVAC ¹⁰⁷
64.	Ivica HORVAT ¹⁰⁸
65.	Zvonko ILEŠ ¹⁰⁹
66.	Ivica IMBRIŠIĆ ¹¹⁰
67.	Aleksander IVEZIĆ ¹¹¹
68.	Marko JAJALO ¹¹²
69.	Martin JAKUBOVSKI ¹¹³
70.	Tomo JAMBOR ¹¹⁴
71.	Mihael JANIĆ ¹¹⁵
72.	Boris JANTOL ¹¹⁶
73.	Zlatko JARABEK ¹¹⁷
74.	Ivica JEZIDŽIĆ ¹¹⁸
75.	Zvonimir JOVAN ¹¹⁹
76.	Branko JOVANOVIĆ ¹²⁰
77.	Oliver JOVANOVIĆ ¹²¹
78.	Goran JULARIĆ ¹²²
79.	Damir JURELA ¹²³
80.	Željko JURELA ¹²⁴
81.	Drago JURENDIĆ ¹²⁵
82.	Marko JURISIĆ ¹²⁶
83.	Pavao JURIŠIĆ ¹²⁷
84.	Igor KAČIĆ ¹²⁸
85.	Josip KAPUSTIĆ ¹²⁹
86.	Krešimir KELAVA ¹³⁰
87.	Đuro KNEŽIĆ ¹³¹
88.	Tomislav KOLAK ¹³²
89.	Vladimir KOLAK ¹³³
90.	Ivan KOMORSKI ¹³⁴
91.	Borislav KOSTOVIĆ ¹³⁵
92.	Ivan KOVAČ ¹³⁶
93.	Zoran KOVAČEVIĆ ¹³⁷
94.	Josip KOŽUL ¹³⁸
95.	Ivan KRAJINOVIĆ ¹³⁹
96.	Zlatko KRAJINOVIĆ ¹⁴⁰
97.	Ivan KRASIĆ ¹⁴¹
98.	Ivica KREZO ¹⁴²
99.	Kazimir KRSTIČEVIĆ ¹⁴³
100.	Drago KRIZAN ¹⁴⁴
101.	Branimir KRUNEŠ ¹⁴⁵
102.	Tomislav LESIĆ ¹⁴⁶
103.	Mihajlo LET ¹⁴⁷
104.	Dragutin LILI ¹⁴⁸
105.	Hrvoje LJUBAS ¹⁴⁹

106.	Joko LOVRIĆ ¹⁵⁰	
107.	Marko LUCIĆ ¹⁵¹	
108.	Branko LUKENDA ¹⁵²	
109.	Mato LUKIĆ ¹⁵³	
110.	Predrag MAGOČ ¹⁵⁴	
111.	Željko MAJOR ¹⁵⁵	
112.	Marko MANDIĆ ¹⁵⁶	
113.	Zdenko MARIČIĆ ¹⁵⁷	
114.	Andrija MEĐEŠI ¹⁵⁸	
115.	Zoran MEĐEŠI ¹⁵⁹	
116.	Josip MIHALEC ¹⁶⁰	
117.	Tomislav MIHOVIĆ ¹⁶¹	
118.	Zdravko MIKULIĆ ¹⁶²	
119.	Ivan MIŠIĆ ¹⁶³	
120.	Mile MLINARIĆ ¹⁶⁴	
121.	Andrija MOKOŠ ¹⁶⁵	
122.	Aleksandar MOLNAR ¹⁶⁶	
123.	Antun MUTVAR ¹⁶⁷	
124.	Darko NAĐ ¹⁶⁸	
125.	Franjo NAĐ ¹⁶⁹	
126.	Ivan NEJAŠMIĆ ¹⁷⁰	
127.	Vladislav OREŠKI ¹⁷¹	
128.	Tomislav PAPP ¹⁷²	
129.	Željko PATARIĆ ¹⁷³	
130.	Slobodan PAVLIĆ ¹⁷⁴	
131.	Zlatko PAVLOVIĆ ¹⁷⁵	
132.	Mato PERAK ¹⁷⁶	
133.	Aleksandar PERKO ¹⁷⁷	
134.	Damir PERKOVIĆ ¹⁷⁸	
135.	Josip PERKOVIĆ ¹⁷⁹	
136.	Stjepan PETROVIĆ ¹⁸⁰	
137.	Nikola PINTER ¹⁸¹	
138.	Ivan PLAVŠIĆ ¹⁸²	
139.	Damir POLHERT ¹⁸³	
140.	Branimir POLOVINA ¹⁸⁴	
141.	Stanko POSAVEC ¹⁸⁵	
142.	Janja PODHORSKI ¹⁸⁶	
143.	Tomo PRAVDIĆ ¹⁸⁷	
144.	Dmitar PUCAR ¹⁸⁸	
145.	Ivan RADACIĆ ¹⁸⁹	
146.	Ivan RAGUŽ ¹⁹⁰	
147.	Milan RAŠIĆ ¹⁹¹	
148.	RATKOVIĆ, Krešimir ¹⁹²	
149.	Marko RIBIČIĆ ¹⁹³	
150.	Salvador RIMAC ¹⁹⁴	
151.	Karlo ROHAČEK ¹⁹⁵	
152.	Čeman SAITI ¹⁹⁶	
153.	Damir ŠIMENIĆ ¹⁹⁷ ,	

154.	Pero ŠIMUNIĆ ¹⁹⁸	
155.	Pavao SPUDIĆ ¹⁹⁹	
156.	Marko STANIĆ ²⁰⁰	
157.	Željko STANIĆ ²⁰¹	
158.	Petar STEFANKO ²⁰²	
159.	Ivan STOJANOVIĆ ²⁰³	
160.	Ljubomir STUBIČAR ²⁰⁴	
161.	Stjepan ŠARIK ²⁰⁵	
162.	Đuro ŠRENK ²⁰⁶	
163.	Dražen ŠTEFULJ ²⁰⁷	
164.	Tadija TADIĆ ²⁰⁸	
165.	Antun TEREK ²⁰⁹	
166.	Darko TIŠLJARIĆ ²¹⁰	
167.	Ivica TIVANOVAC ²¹¹	
168.	Tihomir TOMASIĆ ²¹²	
169.	Željko TORDINAC ²¹³	
170.	Tomislav TOT ²¹⁴	
171.	Tihomir TRALJIĆ ²¹⁵	
172.	Miroslav TURK ²¹⁶	
173.	Petar TURK ²¹⁷	
174.	Dane TUSTONJIĆ ²¹⁸	
175.	Dražen TUŠKAN ²¹⁹	
176.	Branko UŠAK ²²⁰	
177.	Mirko VAGENHOFER ²²¹	
178.	Zvonko VARENICA ²²²	
179.	Vladimir VARGA ²²³	
180.	Goran VIDOS ²²⁴	
181.	Antun VIRGES ²²⁵	
182.	Mate VLAHO ²²⁶	
183.	Miroslav VLAHO ²²⁷	
184.	Zlatan VOLODER ²²⁸	
185.	Zlatko VUJEVIĆ ²²⁹	
186.	Slaven VUKOJEVIĆ ²³⁰	
187.	Rudolf VUKOVIĆ ²³¹	
188.	Ivan VULIĆ ²³²	
189.	Mihajlo ZERA ²³³	
190.	Josip ZELJKO ²³⁴	
191.	Dominik ŽERAVICA ²³⁵	
192.	Borislav ŽUGEČ ²³⁶ PVIC	
193.	Ružica MARKOBASIĆ ²³⁷	“Cigan”, “Dasic,” “Zoran from Karamumba” ²³⁸
194.	Damjan SAMARDŽIĆ ²³⁹	Milan Bulić ²⁴⁰
195.	Siniša VEBER ²⁴¹	Djordje Sosic aka Cica ²⁴²

¹ Listed Perpetrators are the same for every listed victim and except where specifically stated and are not meant to indicate direct perpetration of each individual killing.

² Exhumed from mass grave at Ovčara Exh.P00782, p.3; Exh.P00609, p.9.

³ [REDACTED]; Stoparić, T.2357-2358; Vukašinić, T.12325.

⁴ [REDACTED].

⁵ [REDACTED].

⁶ [REDACTED].

⁷ [REDACTED].

⁸ [REDACTED]; Stoparić, T.2357-2358, 2361.

⁹ [REDACTED].

¹⁰ [REDACTED].

¹¹ [REDACTED].

¹² [REDACTED].

¹³ [REDACTED].

¹⁴ [REDACTED].

¹⁵ [REDACTED].

¹⁶ [REDACTED].

¹⁷ [REDACTED].

¹⁸ [REDACTED]; Stoparić, T.2359-2360.

¹⁹ Vukašinić, T.12325; [REDACTED]; Stoparić, T.2358-2360; [REDACTED]

²⁰ Vukašinić, T.12325-12327; [REDACTED].

²¹ [REDACTED].

¹⁹ [REDACTED]; Exh.P00278, paras.48, 51.

²³ [REDACTED].

²⁴ [REDACTED].

²⁵ [REDACTED].

²⁶ [REDACTED].

²⁷ [REDACTED].

²⁸ [REDACTED].

²⁹ [REDACTED].

³⁰ [REDACTED].

³¹ [REDACTED].

³² [REDACTED].

³³ [REDACTED].

³⁴ [REDACTED].

³⁵ [REDACTED].

³⁶ [REDACTED].

³⁷ [REDACTED].

³⁸ [REDACTED].

³⁹ [REDACTED].

⁴⁰ [REDACTED].

⁴¹ [REDACTED].

⁴² [REDACTED].

⁴³ VS-002, T.6657; [REDACTED].

⁴⁴ [REDACTED].

⁴⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618.

⁴⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618.

⁴⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618.

⁴⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618.

⁴⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.

⁵⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618.

⁵¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618; Appears on list of people Berghofer saw being taken from Vukovar Hospital to Ovčara. Exh.P00281.

⁵² Baketa Goran was a security guard at Vukovar Hospital who was taken away and never seen again. Bosanac, T.11365; P Appears in VMH Hospital Records, Bosanac, Exh.P00599.

⁵³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618; Last seen by VS-021 at Ovčara. Exh.P00271, T.4643.

- ⁵⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618; Balog was a minor child taken from Vukovar Hospital to Ovčara and killed. Bosanac, T.11373, Exh.P00601.
- ⁵⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Exh.P00617.
- ⁵⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁵⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁵⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁵⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁶⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁶¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁶² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁶³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁶⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁶⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618. Victim was seen by Berghofer at Ovčara severely beaten, Exh.P00278, para.64, 67; Exh.P00281, Berghofer, T.4870-4871.
- ⁶⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁶⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Berghofer saw victim taken from Vukovar Hospital to Ovčara farm on 20 November 1991. Exh.P00278, para.67; Exh.P00281, Berghofer, T.4861-4875; Appears in VMH Hospital Records, Bosanac, Exh.P00599.
- ⁶⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁶⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁷⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁷¹ Berghofer saw victim at Ovčara, Exh.P00278, para 67; Berghofer, T.4861-4875; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁷² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁷³ Exh.P00609; Exh.P00599.
- ⁷⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618; Berghofer saw victim at Ovčara. Exh.P00278, para.67, Exh. P00281 Berghofer, T.4861-4875, Dr. Bosanac saw her father in law placed on a bus from the hospital to Ovčara and never saw him again. Bosanac, T.11369, Exh.P00600.
- ⁷⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; P00618; Berghofer saw at Ovčara. Exh.P00278, para.67; Exh.P00281; Berghofer, T.4861-4875, Dr. Bosanac testified he was taken to Ovčara from the hospital and killed, Bosanac, T.11370; Exh.P00600.
- ⁷⁶ Victim was at the hospital on November 20 when the JNA came and was never heard from or seen again. Bosanac, T.11365; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁷⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁷⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁷⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁸⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁸¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁸² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁸³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁸⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; [REDACTED].
- ⁸⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁸⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; [REDACTED]; Appears in VMH Hospital Records. Bosanac, Exh.P00599.

- ⁸⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁸⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁸⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁹⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁹¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁹² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁹³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618.
- ⁹⁴ Victim was seen by Berghofer from Vukovar Hospital to Ovčara, Exh.P00278, para.51; Exh.P00281; Exh.P00781, p.5 (GAŠPAR is marked as missing).
- ⁹⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00618; [REDACTED]; Exh.P00271; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁹⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; [REDACTED], Berghofer saw victim beaten at Ovčara; P00278, para 58; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁹⁷ Exhumed from mass grave at Ovčara, Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ⁹⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ⁹⁹ [REDACTED]; P00781 p.5 (GREJZA is marked as missing); On list of patients at Vukovar Hospital; Exh.P00599; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁰⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Vilm Karlović saw victim on bus from Vukovar Hospital to JNA barracks. Karlović, T.4711; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁰¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁰² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁰³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁰⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁰⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁰⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁰⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh.P00278, para.67.
- ¹⁰⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁰⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh.P00278, para 67.
- ¹¹⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹¹¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹¹² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹¹³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹¹⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹¹⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹¹⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹¹⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹¹⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹¹⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹²⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹²¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609 Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹²² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.

- ¹²³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹²⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; [REDACTED]
- ¹²⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹²⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹²⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹²⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹²⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹³⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹³¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹³² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67.
- ¹³³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67.
- ¹³⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹³⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹³⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67.
- ¹³⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹³⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹³⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁴⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁴¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁴² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁴³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁴⁴ [REDACTED]; Recorded as "missing." Exh.P00781; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁴⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.Exh.P00609.
- ¹⁴⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609. Bosanac testified that he was left away from the hospital and killed at Ovčara; [REDACTED]; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁴⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁴⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁴⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁵⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁵¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁵² Bosanac testified that Lukenda worked at the hospital and appeared on the list of those that were missing from that day. Bosanac, T.11364-11366; P00781 p.8 (marked as missing); Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁵³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁵⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁵⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609. Karlović saw victim in Vukovar Hospital and forced to run the gauntlet at Ovčara. Karlović, T.4721; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁵⁶ Victim seen by VS-021 at the hospital. Exh. P00271; P00781 p.8(marked as missing).
- ¹⁵⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.

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- ¹⁵⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁵⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁶⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁶¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁶² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁶³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁶⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁶⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁶⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁶⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁶⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁶⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁷⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁷¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁷² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁷³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁷⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁷⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67.
- ¹⁷⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; VS-021 saw victim at Ovčara. Exh.P00271.
- ¹⁷⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁷⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁷⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁸⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁸¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁸² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁸³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁸⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁸⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁸⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁸⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609;
- ¹⁸⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁸⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁹⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁹¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁹² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁹³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁹⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁹⁵ P00781 p.10 (marked as identified).
- ¹⁹⁶ [REDACTED]; VS-021, Exh.P000271; Victim listed as missing. Bilić, P00781 p.10; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ¹⁹⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.

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- ¹⁹⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ¹⁹⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁰⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁰¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁰² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²⁰³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁰⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁰⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²⁰⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²⁰⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁰⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; VS-021 saw victim at the hospital. Exh.P00271; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁰⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²¹⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²¹¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²¹² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²¹³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²¹⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²¹⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²¹⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²¹⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²¹⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²¹⁹ Berghofer saw victim at Ovčara, Exh. P00278, para 67; Exh.P00281; Victim listed as missing. Bilić, Exh.P00781.
- ²²⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²²¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²²² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; VS-021 saw victim at Ovčara. Exh.P00271.
- ²²³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²²⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh.P00278, para 67; Exh.P00281.
- ²²⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²²⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00281.
- ²²⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh.P00281.
- ²²⁸ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²²⁹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²³⁰ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; VS-021 saw victim at Ovčara. Exh.P00271; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²³¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Exh.P00609; Exh.P00599; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²³² Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²³³ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²³⁴ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.

- ²³⁵ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²³⁶ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²³⁷ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609.
- ²³⁸ [REDACTED].
- ²³⁹ Čakalić saw victim being beaten at Ovčara and then took his pulse and saw that he was dead. [REDACTED]; Berghofer saw victim at Ovčara, Exh. P00281, para 67; Exh.P00599; P271; P278; Victim listed as missing. Bilić, P00781; Appears in VMH Hospital Records; Bosanac, Exh.P00599.
- ²⁴⁰ [REDACTED]; Čakalić saw victim beaten to death in the Ovčara hangar. He took his pulse and knew that he was dead. Čakalić, T.4935-4936; [REDACTED].
- ²⁴¹ Exhumed from mass grave at Ovčara Exh.P00782; Exh.P00609; Berghofer saw victim at Ovčara, Exh. P00278, para 67; [REDACTED]; Appears in VMH Hospital Records. Bosanac, Exh.P00599.
- ²⁴² Stanko, Dragisa Mastikosa, Damir Sireta. Pero Ciric and Slavko Nikoloc, Kinez, Nikola Dukic, Zoran Dasic, Topola, Dragica were all there forming execution squads. Ivan Husnik and Djordje Sasic aka Cica (LSD) were standing by the pit. Veber was laying half dead below. Every time Verber twitched Sasic would stick a knife into him. [REDACTED].
- ²⁴⁴ Exhumed in December 1991 from a mass grave at Velepomet; Bilić, T.11809-11810; Exh.P00753; Exh.P00788; Berghofer saw victim in a room at Velepomet on 21 November 1991, Berghofer, Exh.P00278, paras.75-77; Čakalić, T.4951.
- ²⁴⁵ Berghofer, Exh.P00278, para.76.
- ²⁴⁶ Berghofer, Exh.P00278, paras.76-77; [REDACTED].
- ²⁴⁷ [REDACTED].
- ²⁴⁸ [REDACTED]; VS-015, T.2344-2347.
- ²⁴⁹ Exhumed in December 1991 from a mass grave at Velepomet. Bilić, T.11809-11810; Exh.P00746, Exh.P00788; Exh.P00278, pp.23-24; Berghofer saw victim in a room at Velepomet on 21 November 1991. Exh.P00278, paras.75-77.
- ²⁵⁰ Exhumed in December 1991 from a mass grave at Velepomet. Bilić, T.11809-11810; Exh.P00749; Exh.P00788; Exh.P00278, p.24; Berghofer saw victim in a room at Velepomet on 21 November 1991. Berghofer, Exh.P00278, paras. 75-77.
- ²⁵¹ Exhumed in December 1991 from a mass grave at Velepomet. Bilić, T.11809-11810; Exh.P.00753, Exh.P00746, Exh.P00749, Exh.P00748, Exh.P00747, Exh.P00752; Exh.P00788.
- ²⁵² Exhumed in December 1991 from a mass grave at Velepomet. Bilić, T.11809-11810; Exh.P00748; Exh.P00788.
- ²⁵³ Exhumed in December 1991 from a mass grave at Velepomet. Bilić, T.11809-11810; Exh.P00752; Exh.P00788.

2. Zvornik

The victims listed at no. 1 were murdered in Zvornik town on or about 9 April 1992.¹ The victim listed at no. 2 was murdered at Ekonomija Farm on or about 12 May 1992.² The victims listed at nos. 3-6 were murdered at Ekonomija Farm between 12 and 20 May 1992.³ The victim listed at no. 7 was murdered at Ciglana Factory in June or July 1992.⁴ The victims listed at nos. 8-92 were murdered at Drinjača Dom Kulture between 30 and 31 May 1992.⁵ The victims listed at nos. 93-116 were murdered at Karakaj Technical School between 1 and 5 June 1992.⁶ The victims listed at nos. 117-121 were murdered at Gero's Slaughter House between 7 and 9 June 1992.⁷ The victims listed at nos. 122-168 were murdered at Čelopek Dom Kulture between 1 and 26 June 1992.⁸

#	Victim(s)	Perpetrator
1.	20 non-Serbs ⁹	Arkan's men assisted by Šešeljević ¹⁰
2.	Nesib DAUTOVIĆ ¹¹	Šešeljević, including Zoks and Vojvoda Čele ¹²
3.	Bego BUKVIĆ ¹³	Šešeljević ¹⁴
4.	Husein ČIRAK ¹⁵	Reserve policemen ¹⁶ and men in JNA uniforms, including members of Šešeljević ¹⁷
5.	Remzija SOFTIĆ ¹⁸	Petko HAJDUKOVIĆ assisted by Niški, Dragan TANIĆ and JASIKOVAC ¹⁹
6.	Abdulah BULJUBAŠIĆ ²⁰	Šešeljević including Major Toro and Savo ²¹

¹ Indictment, para.22; Pre-trial Brief, para.93.

² Indictment, para.22; Pre-trial Brief, para.93.

³ Indictment, para.22, Annex V; Pre-trial Brief, para.93.

⁴ Indictment, para.22, Annex V; Pre-trial Brief, para.93.

⁵ Indictment, para.22, Annex V; Pre-trial Brief, para.93.

⁶ Indictment, para.22 and Annex V; Pre-trial Brief, para.93.

⁷ Indictment, para.22 and Annex V; Pre-trial Brief, para.93.

⁸ Indictment, para.22, Annex V; Pre-trial Brief, para.93.

⁹ Detailing the murder of 17 non-Serbs: VS-1062, T.5955-5958, 5966-5967; [REDACTED].

¹⁰ VS-1062, T.5955-5958.

¹¹ [REDACTED], 5237-5239 [REDACTED]; T.5412-5413, 5416; [REDACTED]; Kopic, Exh.P00362, p.5; [REDACTED].

¹² VS-1013, T.5237-5239 [REDACTED]; [REDACTED]; T.5411-5413; [REDACTED]

¹³ Indictment, Annex V; [REDACTED].

¹⁴ [REDACTED].

¹⁵ Indictment, Annex V; [REDACTED]

¹⁶ [REDACTED]; Exh.P01077, para.114; Kopic, T.5913.

¹⁷ Kopic, Exh.P00362, pp.3-4, 6; VS-1015, T.5401. Kopic refers to Šešelj's men as "White Eagles".

¹⁸ Indictment, Annex V; [REDACTED].

¹⁹ [REDACTED].

²⁰ Indictment, Annex V; VS-1013, T.5235-5236; Kopic, Exh.P00362, pp.5-6; VS-1015, T.5408-5409, 5418-5419; [REDACTED]; Bošković, Exh.P00836, para.23; [REDACTED];

²¹ [REDACTED]; VS-1013, T.5235-5236.

7.	Ismet ĆIRAK ²²	Šešeljevi including Pufta and Saša ²³
8.	Beriz ABIDović ²⁴	Šešeljevi ²⁵
9.	Hariz ABIDović ²⁶	
10.	Muriz ABIDović ²⁷	
11.	Ramo ABIDović ²⁸	
12.	Asim AHMETović ²⁹	
13.	Fahro AHMETović ³⁰	
14.	Hasan AHMETović ³¹	
15.	Hrusto AHMETović ³²	
16.	Mihrudin AHMETović ³³	
17.	Ramiz AHMETović ³⁴	
18.	Ramo AHMETović ³⁵	
19.	Senad AHMETović ³⁶	
20.	Venis AHMETović ³⁷	
21.	Hasan ALIĆ ³⁸	
22.	Ibrahim ALIĆ ³⁹	
23.	Kadrija ALIĆ ⁴⁰	
24.	Mehmedalija ALIĆ ⁴¹	
25.	Mujo ALIĆ ⁴²	
26.	Zahid ALIĆ ⁴³	
27.	Asim AVDIĆ ⁴⁴	
28.	Muradif AVDIĆ ⁴⁵	
29.	Sinan BAŠIĆ ⁴⁶	

²² Indictment, Annex V; VS-1013, T.5251-5253 [REDACTED]; Kopic, Exh.P00362, p.8; VS-1015, T.5435-5436.

²³ VS-1013, T.5251-5253 [REDACTED]; Kopic, Exh.P00362, p.8; VS-1015, T.5435-5436; [REDACTED].

²⁴ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

²⁵ The perpetrators of the murders at Drinjača Dom Kulture are the same for all listed victims. VS-1064, T.8717-8718, 8737-8739.

²⁶ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

²⁷ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

²⁸ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

²⁹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

³⁰ [REDACTED]; VS-1064, T.8710-8716, 8719-8721.

³¹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

³² [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

³³ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

³⁴ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

³⁵ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

³⁶ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

³⁷ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

³⁸ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

³⁹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁴⁰ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁴¹ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁴² [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁴³ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁴⁴ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁴⁵ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁴⁶ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

30.	Edin BARUČIĆ ⁴⁷	
31.	Hakija BARUČIĆ ⁴⁸	
32.	Hazim BARUČIĆ ⁴⁹	
33.	Mehmedalija BARUČIĆ ⁵⁰	
34.	Mirsad BARUČIĆ ⁵¹	
35.	Suad BARUČIĆ ⁵²	
36.	Vehid BARUČIĆ ⁵³	
37.	Zulfo BARUČIĆ ⁵⁴	
38.	Osman BEČIĆ ⁵⁵	
39.	Džemal BEGANović ⁵⁶	
40.	Esad BEGANović ⁵⁷	
41.	Mehmed BEGANović ⁵⁸	
42.	Mustafa BEGANović ⁵⁹	
43.	Nezir BEGANović ⁶⁰	
44.	Smajo BEGANović ⁶¹	
45.	Redžo BJELIĆ ⁶²	
46.	Aljo ČOHODAREVIĆ ⁶³	
47.	Beriz DAUTOVIĆ ⁶⁴	
48.	Esad DAUTOVIĆ ⁶⁵	
49.	Hasan DAUTOVIĆ ⁶⁶	
50.	Husein DAUTOVIĆ ⁶⁷	
51.	Huso DAUTOVIĆ ⁶⁸	
52.	Idriz DAUTOVIĆ ⁶⁹	
53.	Mirsad DAUTOVIĆ ⁷⁰	
54.	Mirzet DAUTOVIĆ ⁷¹	

⁴⁷ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁴⁸ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁴⁹ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁵⁰ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁵¹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁵² [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁵³ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁵⁴ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁵⁵ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁵⁶ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁵⁷ [REDACTED]; VS-1064 T.8710-8716, 8719-8721; [REDACTED].

⁵⁸ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁵⁹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶⁰ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁶¹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶² [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁶³ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶⁴ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶⁵ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶⁶ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶⁷ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶⁸ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁶⁹ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁷⁰ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁷¹ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

55.	Nezir DAUTOVIĆ ⁷²	
56.	Omer DAUTOVIĆ ⁷³	
57.	Ragib DAUTOVIĆ ⁷⁴	
58.	Ramo DAUTOVIĆ ⁷⁵	
59.	Mevludin FEJZIC ⁷⁶	
60.	Nuko FEJZIC ⁷⁷	
61.	Muriz HUSEINOVIC ⁷⁸	
62.	Velid HUSEINOVIC ⁷⁹	
63.	Ahmet IBRALIC ⁸⁰	
64.	Amil IBRALIC ⁸¹	
65.	Nezir IBRALIC ⁸²	
66.	Mustafa KARIC ⁸³	
67.	Haso MEMIŠEVIC ⁸⁴	
68.	Ramiz MEMIŠEVIC ⁸⁵	
69.	Ramo MEMIŠEVIC ⁸⁶	
70.	Senaid MEMIŠEVIC ⁸⁷	
71.	Zaim MEMIŠEVIC ⁸⁸	
72.	Azem MURATOVIC ⁸⁹	
73.	Bajro MURATOVIC ⁹⁰	
74.	Mehmed MURATOVIC ⁹¹	
75.	Hasib MUSTAFIC ⁹²	
76.	Juso MUSTAFIC ⁹³	
77.	Salko MUSTAFIC ⁹⁴	
78.	Šaban OSMANOVIC ⁹⁵	
79.	Šabanija OSMANOVIC ⁹⁶	

⁷² [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁷³ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁷⁴ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁷⁵ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁷⁶ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁷⁷ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁷⁸ [REDACTED]; VS-1064 T.8710-8716, 8719-8721; [REDACTED].

⁷⁹ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁸⁰ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁸¹ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁸² [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁸³ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁸⁴ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁸⁵ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁸⁶ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁸⁷ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁸⁸ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁸⁹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁹⁰ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁹¹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁹² [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁹³ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁹⁴ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁹⁵ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁹⁶ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

80.	Demail OSMANOVIC ⁹⁷	
81.	Bajro OSMANOVIC ⁹⁸	
82.	Juso OSMANOVIC ⁹⁹	
83.	Mehmedalija OSMANOVIC ¹⁰⁰	
84.	Meho OSMANOVIC ¹⁰¹	
85.	Muhamed OSMANOVIC ¹⁰²	
86.	Mujo OSMANOVIC ¹⁰³	
87.	Mujo OSMANOVIC ¹⁰⁴	
88.	Ramo OSMANOVIC ¹⁰⁵	
89.	Redžo OSMANOVIC ¹⁰⁶	
90.	Sefer OSMANOVIC ¹⁰⁷	
91.	Smajo OSMANOVIC ¹⁰⁸	
92.	Mujo ŠABANOVIĆ ¹⁰⁹	
93.	More than 150 Bosnian Muslim men ¹¹⁰	Serb forces ¹¹¹ including soldiers in camouflage uniforms; ¹¹² Serb TO; Serb civilian authorities; Niški's men; and Šešeljević including Yellow Wasps, Pivarski's men and Loznica group ¹¹³
94.	Hrustan AVDIĆ ¹¹⁴	
95.	Nešad HAMZIĆ ¹¹⁵	
96.	Ramiz SINANOVIĆ ¹¹⁶	
97.	Osman SMAJLOVIĆ ¹¹⁷	
98.	Meho BOŠNAK ¹¹⁸	
99.	Alija GOJKIĆ ¹¹⁹	
100.	Mustafa GOJKIĆ ¹²⁰	
101.	Himzo GOJKIĆ ¹²¹	
102.	Mensur GOJKIĆ ¹²²	

⁹⁷ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

⁹⁸ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

⁹⁹ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

¹⁰⁰ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

¹⁰¹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

¹⁰² [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

¹⁰³ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

¹⁰⁴ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

¹⁰⁵ [REDACTED]; VS-1064, T.8710-8716, 8719-8721.

¹⁰⁶ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

¹⁰⁷ [REDACTED]; VS-1064, T.8710-8716, 8719-8720; [REDACTED].

¹⁰⁸ [REDACTED]; VS-1064, T.8710-8716, 8719-8720.

¹⁰⁹ [REDACTED]; VS-1064 T.8710-8716, 8719-8721.

¹¹⁰ [REDACTED].

¹¹¹ The perpetrators of the murders at Karakaj Technical School are the same for all listed victims.

¹¹² [REDACTED].

¹¹³ [REDACTED]; VS-2000, T.14026-14028; [REDACTED]; P00971, pp.3-4, 7.

¹¹⁴ [REDACTED].

¹¹⁵ [REDACTED].

¹¹⁶ [REDACTED].

¹¹⁷ [REDACTED].

¹¹⁸ [REDACTED].

¹¹⁹ [REDACTED].

¹²⁰ [REDACTED].

¹²¹ [REDACTED].

¹²² [REDACTED].

103.	Senad GOJKIĆ ¹²³	
104.	Husein GOJKIĆ ¹²⁴	
105.	Hasan GOJKIĆ ¹²⁵	
106.	Agan GOJKIĆ ¹²⁶	
107.	Zijad GOJKIĆ ¹²⁷	
108.	Nijaz GOJKIĆ ¹²⁸	
109.	Ibro GOJKIĆ ¹²⁹	
110.	Ahmet GOJKIĆ ¹³⁰	
111.	Sead SELIMOVIĆ ¹³¹	
112.	Osman SELIMOVIĆ ¹³²	
113.	Dževad SELIMOVIĆ ¹³³	
114.	Himzo DEDIĆ ¹³⁴	
115.	Nurija DELIĆ ¹³⁵	Serb forces ¹³⁸ including soldiers in camouflage uniforms; ¹³⁹ Serb TO; Serb civilian authorities; Niški's men; and Šešeljevc i including Yellow Wasps and Pivarski's men ¹⁴⁰
116.	Nurdin DELIĆ ¹³⁶	
117.	More than 150 detainees ¹³⁷	
118.	Sejdo HASNOVIĆ ¹⁴¹	
119.	Muradif HASANOVIĆ ¹⁴²	
120.	Smajo SMAILOVIĆ ¹⁴³	
121.	Asim HAMZIĆ ¹⁴⁴	
122.	Ramo ALIHOĐIĆ ¹⁴⁵	Šešeljevc i including Yellow wasps members Repić and Lopov and Zoks and Major; ¹⁴⁶
123.	Sulejman KAPIDŽIĆ ¹⁴⁷	
124.	Enes ĐIHIC ¹⁴⁸	
125.	Ibro HALILOVIĆ ¹⁴⁹	

¹²³ [REDACTED].

¹²⁴ [REDACTED].

¹²⁵ [REDACTED].

¹²⁶ [REDACTED].

¹²⁷ [REDACTED].

¹²⁸ [REDACTED].

¹²⁹ [REDACTED].

¹³⁰ [REDACTED].

¹³¹ [REDACTED].

¹³² [REDACTED].

¹³³ [REDACTED].

¹³⁴ [REDACTED].

¹³⁵ [REDACTED].

¹³⁶ [REDACTED].

¹³⁷ [REDACTED].

¹³⁸ The perpetrators of the murders at Gero's Slaughter House are the same for all listed victims.

¹³⁹ [REDACTED].

¹⁴⁰ [REDACTED]; VS-2000, T.14026-14028; [REDACTED]

¹⁴¹ [REDACTED].

¹⁴² [REDACTED].

¹⁴³ [REDACTED].

¹⁴⁴ [REDACTED].

¹⁴⁵ [REDACTED]; VS-1065, T.6318-6319, 6329.

¹⁴⁶ The perpetrators of the murders at Čelopek Dom Kulture are the same for all listed victims. VS-1065, T.6315-6316, 6318-6319, 6330-6331, 6334, 6336-6337; [REDACTED]

¹⁴⁷ [REDACTED]; VS-1065, T.6318-6319, 6329.

¹⁴⁸ [REDACTED]; VS-1065, T.6320, 6329.

¹⁴⁹ [REDACTED]; VS-1065, T.6320, 6329.

126.	Izet HADŽIĆ ¹⁵⁰	
127.	Smail KAPIDŽIĆ ¹⁵¹	
128.	Sead KAPIDŽIĆ ¹⁵²	
129.	Eniz KAPIDŽIĆ ¹⁵³	
130.	Himzo KURŠUMOVIC ¹⁵⁴	
131.	Aziz TUHČIĆ ¹⁵⁵	
132.	Damir BIKIĆ ¹⁵⁶	
133.	Ejub TUHČIĆ ¹⁵⁷	
134.	Alija ATLIĆ ¹⁵⁸	
135.	Husein SALIHOVIĆ ¹⁵⁹	
136.	Salim ZAHIROVIĆ ¹⁶⁰	
137.	Hasan HALILOVIĆ ¹⁶¹	
138.	Nesib OKANOVIĆ ¹⁶²	
139.	Sead ĐIHIC ¹⁶³	
140.	Sehad ATLIĆ ¹⁶⁴	
141.	Zaim PEZEROVIĆ ¹⁶⁵	
142.	Sakib KAPIDŽIĆ ¹⁶⁶	
143.	Šaban BIKIĆ ¹⁶⁷	
144.	Hasan ATLIĆ ¹⁶⁸	
145.	Fikret JAHJAGIĆ ¹⁶⁹	
146.	Omer OKANOVIĆ ¹⁷⁰	
147.	Nurija BIKIĆ ¹⁷¹	
148.	Ibro HALIHOVIĆ ¹⁷²	
149.	Zulkarnejn EFENDIĆ ¹⁷³	
150.	Alimir TUHČIĆ ¹⁷⁴	

¹⁵⁰ [REDACTED]; VS-1065, T.6329.

¹⁵¹ [REDACTED]; VS-1065, T.6329-6330.

¹⁵² [REDACTED]; VS-1065, T.6329-6330.

¹⁵³ [REDACTED]; VS-1065, T.6329-6330.

¹⁵⁴ [REDACTED]; VS-1065, T.6331-6332 [REDACTED]

¹⁵⁵ [REDACTED]; VS-1065, T.6331-6332 [REDACTED]

¹⁵⁶ [REDACTED]; VS-1065, T.6331-6332 [REDACTED]

¹⁵⁷ [REDACTED]; VS-1065, T.6331-6332 [REDACTED]

¹⁵⁸ [REDACTED]; VS-1065, T.6331-6332 [REDACTED]

¹⁵⁹ [REDACTED]; VS-1065, T.6332-6333 [REDACTED]

¹⁶⁰ [REDACTED]; VS-1065, T.6332-6333 [REDACTED]

¹⁶¹ [REDACTED]; VS-1065, T.6332-6333 [REDACTED]

¹⁶² [REDACTED]; VS-1065, T.6332-6333 [REDACTED]

¹⁶³ [REDACTED]; VS-1065, T.6332-6333 [REDACTED]

¹⁶⁴ [REDACTED]; VS-1065, T.6333 [REDACTED]

¹⁶⁵ [REDACTED]; VS-1065, T.6333-6334.

¹⁶⁶ [REDACTED]; VS-1065, T.6333-6334.

¹⁶⁷ [REDACTED]; VS-1065, T.6334.

¹⁶⁸ [REDACTED]; VS-1065, T.6334.

¹⁶⁹ [REDACTED]; VS-1065, T.6334.

¹⁷⁰ [REDACTED]; VS-1065, T.6330.

¹⁷¹ [REDACTED]; VS-1065, T.6330.

¹⁷² [REDACTED]; VS-1065, T.6330.

¹⁷³ [REDACTED]; VS-1065, T.6336-6339.

¹⁷⁴ [REDACTED]; VS-1065, T.6336-6339.

151.	Alija EFENDIĆ ¹⁷⁵	
152.	Hajro EFENDIĆ ¹⁷⁶	
153.	Edin KULIN ¹⁷⁷	
154.	Ibrahim ČORMEHIĆ ¹⁷⁸	
155.	Benjamin ALIHODIĆ ¹⁷⁹	
156.	Ahmet ALIHODIĆ ¹⁸⁰	
157.	Mustafa KULJANIN ¹⁸¹	
158.	Farid HADIAVDIĆ ¹⁸²	
159.	Šemsudin ĐIHIC ¹⁸³	
160.	Senad PEZEROVIĆ ¹⁸⁴	
161.	Ahmet MURATOVIC ¹⁸⁵	
162.	Abdurahman HALILOVIĆ ¹⁸⁶	
163.	Edin PAŠIĆ ¹⁸⁷	
164.	Mujo PAŠIĆ ¹⁸⁸	
165.	Abdulah ATLIĆ ¹⁸⁹	
166.	Meho FEJZIĆ ¹⁹⁰	
167.	Ismail KURŠUMOVIC ¹⁹¹	
168.	Alija BIKIĆ ¹⁹²	

3. Greater Sarajevo

(a) Ilijaš

The victims listed at nos. 1-22 were murdered in Lješevo, Ilijaš Municipality, on or about 5 June 1992.¹⁹³ The victim listed at no. 23 was murdered in the area of Crna Rijeka in the summer of 1993.¹⁹⁴

¹⁷⁵ [REDACTED]; VS-1065, T.6336-6339.

¹⁷⁶ [REDACTED]; VS-1065, T.6336-6339.

¹⁷⁷ [REDACTED]; VS-1065, T.6336-6339.

¹⁷⁸ [REDACTED]; VS-1065, T.6336-6339.

¹⁷⁹ [REDACTED]; VS-1065, T.6336-6339.

¹⁸⁰ [REDACTED]; VS-1065, T.6336-6339.

¹⁸¹ [REDACTED]; VS-1065, T.6336-6339.

¹⁸² [REDACTED]; VS-1065, T.6336-6339.

¹⁸³ [REDACTED]; VS-1065, T.6336-6339.

¹⁸⁴ [REDACTED]; VS-1065, T.6336-6339.

¹⁸⁵ [REDACTED]; VS-1065, T.6336-6339.

¹⁸⁶ [REDACTED]; VS-1065, T.6336-6339.

¹⁸⁷ [REDACTED]; VS-1065, T.6336-6339.

¹⁸⁸ [REDACTED]; VS-1065, T.6336-6339.

¹⁸⁹ [REDACTED]; VS-1065, T.6336-6339.

¹⁹⁰ [REDACTED]; VS-1065, T.6336-6339.

¹⁹¹ [REDACTED]; VS-1065, T.6336-6339.

¹⁹² [REDACTED]; VS-1065, T.6336-6339.

¹⁹³ Indictment, para.24, Annex VII; Pre-trial Brief, para.98.

¹⁹⁴ Indictment, para.24; Pre-trial Brief, para.100.

#	Victim(s)	Perpetrator(s)
1.	Suljo FAZLIĆ ¹⁹⁵	Members of the Ilijaš TO, including Marinko VIDOVIĆ, Pero VUJOVIĆ and Ranko DRAŠKIĆ; Savo MANOJLOVIĆ ¹⁹⁶
2.	Munira FAZLIĆ ¹⁹⁷	
3.	Hasan FAZLIĆ ¹⁹⁸	
4.	Arif FAZLIĆ ¹⁹⁹	
5.	Safet FAZLIĆ ²⁰⁰	
6.	Ibrahim FAZLIĆ ²⁰¹	
7.	Huso FAZLIĆ ²⁰²	
8.	Munir MASNOPITA ²⁰³	
9.	Fadil MASNOPITA ²⁰⁴	
10.	Mehmet MASNOPITA ²⁰⁵	
11.	Husnija MASNOPITA ²⁰⁶	
12.	Mujo MASNOPITA ²⁰⁷	
13.	Jasmin MASNOPITA ²⁰⁸	
14.	Mensud MASNOPITA ²⁰⁹	
15.	Zubejda SULJIĆ ²¹⁰	
16.	Nijaz NUHIĆ ²¹¹	
17.	Čamil AVDUKIĆ ²¹²	
18.	Izet AVDUKIĆ ²¹³	
19.	Asim KARAVDIĆ ²¹⁴	
20.	Amir FAZLIĆ ²¹⁵	Vasilije VIDOVIĆ aka VASKE or one of his Šešeljevci ²¹⁶
21.	Arif OMANOVIĆ ²¹⁷	Serb forces attacking Ilijaš, including members of the Ilijaš TO and Vasilije VIDOVIĆ's Šešeljevci ²¹⁸
22.	Meho FAZLIĆ ²¹⁹	

¹⁹⁵ [REDACTED]; Džafić, Exh.P00840, para.13; [REDACTED].

¹⁹⁶ [REDACTED].

¹⁹⁷ [REDACTED]; Džafić, Exh.P00840, para.13; [REDACTED].

¹⁹⁸ [REDACTED]; Džafić, Exh.P00840, para.13; [REDACTED].

¹⁹⁹ [REDACTED]; Džafić, Exh.P00840, para.13; [REDACTED].

²⁰⁰ [REDACTED]; Džafić, Exh.P00840, para.13; [REDACTED].

²⁰¹ [REDACTED]; Džafić, Exh.P00840, para.13; [REDACTED].

²⁰² [REDACTED]; Džafić, Exh.P00840, para.13; [REDACTED].

²⁰³ [REDACTED].

²⁰⁴ [REDACTED].

²⁰⁵ [REDACTED].

²⁰⁶ [REDACTED].

²⁰⁷ [REDACTED].

²⁰⁸ [REDACTED].

²⁰⁹ [REDACTED].

²¹⁰ [REDACTED].

²¹¹ [REDACTED].

²¹² [REDACTED].

²¹³ [REDACTED].

²¹⁴ [REDACTED].

²¹⁵ [REDACTED]; VS-1055, T.7819-7820; Džafić, Exh.P00840, para.13; [REDACTED].

²¹⁶ VS-1055, T.7820, 7906-7907, 7921.

²¹⁷ [REDACTED].

²¹⁸ VS-1055, T.7820, 7902, 7906-7907, 7921; [REDACTED]

²¹⁹ [REDACTED].

23.	One unidentified non-Serb civilian ²²⁰	Šešeljevac Vasilije VIDOVIĆ aka Vaske ²²¹
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(b) Vogošća

The listed victims were murdered at Žuč, Vogošća Municipality, in the summer of 1993.²²²

#	Victim(s)	Perpetrator(s)
1.	25 non-Serb civilians ²²³	Dragan DAMJANOVIĆ and Vlado CETKOVIĆ ²²⁴
2.	Avdo TIRIĆ ²²⁵	Dragan DAMJANOVIĆ and Vlado CETKOVIĆ ²²⁶
3.	Nermin SKENDO ²²⁷	Dragan DAMJANOVIĆ and Vlado CETKOVIĆ ²²⁸

(c) Novo Sarajevo

The listed victim was murdered in Grbavica, Novo Sarajevo Municipality, during the Indictment period.²²⁹

#	Victim(s)	Perpetrator(s)
1.	One civilian during forced labour ²³⁰	VRS member, Aleksandar TRIVKOVIĆ aka Saša ²³¹

(d) Ilidža

The listed victims were murdered at Mount Igman, Ilidža Municipality, on 17 July 1993.²³²

#	Victim(s)	Perpetrator(s)
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²²⁰ Sejdić, T.8213-8214, 8347-8348.

²²¹ Sejdić, T.8213-8214, 8347-8348.

²²² Indictment, para.24 and Annex VII; Pre-Trial Brief, para.103.

²²³ Sejdić, T.8218-8224.

²²⁴ Sejdić, T.8220-8221.

²²⁵ Sejdić, T.8218-8226.

²²⁶ Sejdić, T.8223.

²²⁷ Sejdić, T.8218-8226. Misspelled SKENDO instead of SKANDO. Please note that another person named Nermin SKANDO was reported as killed in September 1992. See VS-1055, T.7841; [REDACTED].

²²⁸ Sejdić, T.8223.

²²⁹ Indictment, para.24; Pre-trial Brief, para.105.

²³⁰ VS-1060, T.8608-8609.

²³¹ VS-1060, T.8609.

²³² Indictment, para.24; Pre-trial Brief, para.108.

1.	Robert KAHIRMANOVIĆ ²³³	Unidentified member of Branislav GAVRILOVIĆ's Šešeljevci ²³⁴
2.	Živko KRAJIŠNIK ²³⁵	Member of Branislav GAVRILOVIĆ's Šešeljevci nicknamed Čopo ²³⁶
3.	Rusmir HAMALUKIĆ ²³⁷	Member of Branislav GAVRILOVIĆ's Šešeljevci called PAJKOVIĆ ²³⁸

4. Mostar

The victims listed at nos. 1-81 were murdered at Uborak on or about 13 June 1992.²³⁹

The victims listed at nos. 82-88 were murdered at Sutina on or about 13 June 1992.²⁴⁰

#	Victim	Perpetrator(s)
1.	Hajro ČORIĆ ²⁴¹	Šešeljevci including Srečko LNU; Petar DIVJAKOVIĆ; local Serbs integrated with the Šešeljevci ; Rajko JANJIĆ, Damir ANTELJ, Borislav MIKIN, Šeš PEJAK, Slavko MILOVANOVIĆ, Dragan ANTELJ, Miroslav ANTELJ, Mile ANTELJ, Slobodan UMIĆEVIĆ, Novica ANTELJ and Boškajlo KOVAČEVIĆ. ²⁴²
2.	Nedžad BENCA ²⁴³	
3.	Hajdo SMAJIĆ ²⁴⁴	
4.	Enver OSMANOVIĆ ²⁴⁵	
5.	Admir DELAGIĆ ²⁴⁶	
6.	Salko KELECIJA ²⁴⁷	
7.	Ferid ŠAKRAK ²⁴⁸	
8.	Meho ALIĆ ²⁴⁹	
9.	Asim KOŠPO ²⁵⁰	
10.	Mujo NUHIĆ ²⁵¹	
11.	Enes MEZET ²⁵²	
12.	Himzo ČORIĆ ²⁵³	
13.	Jusuf KANIŽA ²⁵⁴	

²³³ Victim is listed in Pre-trial brief para.108. Koblar, T.7998, 8004-8005.

²³⁴ Koblar, T.7998, 8004-8005.

²³⁵ Koblar, T.8011.

²³⁶ Koblar, T.8011.

²³⁷ Koblar, T.8012.

²³⁸ Koblar, T.8012; Exh.P01000, p.15.

²³⁹ Indictment, para.29, Annex XI; Pre-Trial Brief, para.115.

²⁴⁰ Indictment, para.29, Annex XI; Pre-Trial Brief, para.116.

²⁴¹ [REDACTED].

²⁴² [REDACTED].

²⁴³ [REDACTED]; Exh.P00481, p.1 (public); [REDACTED]

²⁴⁴ [REDACTED].

²⁴⁵ [REDACTED].

²⁴⁶ [REDACTED].

²⁴⁷ [REDACTED].

²⁴⁸ [REDACTED].

²⁴⁹ [REDACTED].

²⁵⁰ [REDACTED]; Exh.P00481, p.1.

²⁵¹ [REDACTED].

²⁵² [REDACTED]; Exh.P00481, p.1 (public); Karišik, T.8772.

²⁵³ [REDACTED].

²⁵⁴ [REDACTED].

14.	Šemsudin MRKONJIĆ ²⁵⁵	
15.	Nedžad SALČIN ²⁵⁶	
16.	Petar ZADRO ²⁵⁷	
17.	Meho RAHIMIĆ ²⁵⁸	
18.	Ljubo KORDIĆ ²⁵⁹	
19.	Mehmed MANJURA ²⁶⁰	
20.	Salih JAZVIN ²⁶¹	
21.	Bego SINANOVIĆ ²⁶²	
22.	Osman SALČIN ²⁶³	
23.	Stjepan MIHALJ ²⁶⁴	
24.	Marko MIHALJ ²⁶⁵	
25.	Mujo PEHILJ ²⁶⁶	
26.	Jelka JURIĆ ²⁶⁷	
27.	Omer HASIĆ ²⁶⁸	
28.	Enver SALČIN ²⁶⁹	
29.	Krešimir JURČIĆ ²⁷⁰	
30.	Smajo ČORIĆ ²⁷¹	
31.	Muhamed SIMIDŽIJA ²⁷²	
32.	Danica JURIĆ ²⁷³	
33.	Bećir POLČIĆ ²⁷⁴	
34.	Sofija ŠKEGRO ²⁷⁵	
35.	Štefa ČULJAK ²⁷⁶	
36.	Aljia OMANOVIĆ ²⁷⁷	
37.	Salko JAPALAK ²⁷⁸	
38.	Fadil DELALIC ²⁷⁹	

²⁵⁵ [REDACTED].

²⁵⁶ [REDACTED].

²⁵⁷ [REDACTED].

²⁵⁸ [REDACTED]; Exh.P00481, p.1 (public); [REDACTED].

²⁵⁹ [REDACTED].

²⁶⁰ [REDACTED].

²⁶¹ [REDACTED].

²⁶² [REDACTED].

²⁶³ [REDACTED].

²⁶⁴ [REDACTED]; Exh.P00481, p.1.

²⁶⁵ [REDACTED]; Exh.P00481, p.1.

²⁶⁶ [REDACTED].

²⁶⁷ [REDACTED].

²⁶⁸ [REDACTED]; Exh.P00481, p.1 (public); Karišik, T.8771.

²⁶⁹ [REDACTED]; Exh.P00481, p.1 (public) (as Enver SALČIĆ).

²⁷⁰ [REDACTED].

²⁷¹ [REDACTED].

²⁷² [REDACTED]; Exh.P00481, p.1 (public) (as Muhamed SIMDŽIJA).

²⁷³ [REDACTED].

²⁷⁴ [REDACTED].

²⁷⁵ [REDACTED].

²⁷⁶ [REDACTED].

²⁷⁷ [REDACTED].

²⁷⁸ [REDACTED].

²⁷⁹ [REDACTED].

39.	Husein BUBALO ²⁸⁰	
40.	Mehmed ZUKIĆ ²⁸¹	
41.	Hamdija HADŽIĆ ²⁸²	
42.	Semir RAHIMIĆ ²⁸³	
43.	Salko TURKIĆ ²⁸⁴	
44.	Mile DUŽEVIĆ ²⁸⁵	
45.	Stjepan BLAŽEVIĆ ²⁸⁶	
46.	Bajram HAJRIZAJ ²⁸⁷	
47.	Dragica MIKULIĆ ²⁸⁸	
48.	Ibro KELECIJA ²⁸⁹	
49.	Mustafa PUCE ²⁹⁰	
50.	Omer DUMPOR ²⁹¹	
51.	Ramo MARIĆ ²⁹²	
52.	Ivan PRSKALO ²⁹³	
53.	Tidža HASIĆ ²⁹⁴	
54.	Sead PUZIĆ ²⁹⁵	
55.	Željko KOKOTOVIĆ ²⁹⁶	
56.	Ferid KLEPO ²⁹⁷	
57.	Petar ČARAPINA ²⁹⁸	
58.	Ibro KUKO ²⁹⁹	
59.	Stjepan BUŠIĆ ³⁰⁰	
60.	Ibrahim JAPALAK ³⁰¹	
61.	Bajro OMANOVIĆ ³⁰²	
62.	Hava BREKALO ³⁰³	
63.	Ramo KUKO ³⁰⁴	

²⁸⁰ [REDACTED].

²⁸¹ [REDACTED].

²⁸² [REDACTED].

²⁸³ [REDACTED].

²⁸⁴ [REDACTED].

²⁸⁵ [REDACTED].

²⁸⁶ [REDACTED].

²⁸⁷ [REDACTED].

²⁸⁸ [REDACTED].

²⁸⁹ [REDACTED].

²⁹⁰ [REDACTED].

²⁹¹ [REDACTED].

²⁹² [REDACTED].

²⁹³ [REDACTED].

²⁹⁴ [REDACTED]; Exh.P00481, p.1.

²⁹⁵ [REDACTED].

²⁹⁶ [REDACTED].

²⁹⁷ [REDACTED].

²⁹⁸ [REDACTED].

²⁹⁹ [REDACTED]; Exh.P00481, p.1; [REDACTED].

³⁰⁰ [REDACTED].

³⁰¹ [REDACTED].

³⁰² [REDACTED].

³⁰³ [REDACTED].

³⁰⁴ [REDACTED]; Exh.P00481, p.1.

64.	Zaim GUBELJIĆ ³⁰⁵	
65.	Mara KORDIĆ ³⁰⁶	
66.	Salih KARABEG ³⁰⁷	
67.	Džafer ALIBEGOVIĆ ³⁰⁸	
68.	Hasan KASALO ³⁰⁹	
69.	Aid KASALO ³¹⁰	
70.	Adis KASALO ³¹¹	
71.	Esad SLIPIČEVIĆ ³¹²	
72.	Miralem ŠESTIĆ ³¹³	
73.	Mario JURIC ³¹⁴	
74.	Mirzo JUKLO ³¹⁵	
75.	Enes JUKLO ³¹⁶	
76.	Jasmin JUKLO ³¹⁷	
77.	Safet ISIĆ ³¹⁸	
78.	Husein KREMO ³¹⁹	
79.	Edin SEFIĆ ³²⁰	
80.	Saša SEFIĆ ³²¹	
81.	Fuad DELIĆ ³²²	
82.	Dane BOŠKOVIĆ ³²³	Šešeljevc; Rajko JANJIĆ and Dragan ANTELJ; Major FNU UGLJEŠIĆ; reservists and other armed non-local Chetniks who wore olive-green uniforms ³²⁴
83.	Mirsad ČATIĆ ³²⁵	
84.	Senad KUKO ³²⁶	
85.	Ljubo MANDURIĆ ³²⁷	
86.	Hajdar OMERIKA ³²⁸	
87.	Ivan REDŽEP ³²⁹	

³⁰⁵ [REDACTED].

³⁰⁶ [REDACTED].

³⁰⁷ [REDACTED].

³⁰⁸ [REDACTED]; Exh.P00481, p.1.

³⁰⁹ [REDACTED].

³¹⁰ [REDACTED].

³¹¹ [REDACTED].

³¹² [REDACTED].

³¹³ [REDACTED].

³¹⁴ [REDACTED]; Exh.P00481, p.1.

³¹⁵ [REDACTED]; Exh.P00481, p.1.

³¹⁶ [REDACTED]; Exh.P00481, p.1.

³¹⁷ [REDACTED]; Exh.P00481, p.1 (as Jasmina JUKLO).

³¹⁸ [REDACTED]; Exh.P00481, p.1.

³¹⁹ [REDACTED].

³²⁰ [REDACTED].

³²¹ [REDACTED].

³²² [REDACTED].

³²³ [REDACTED].

³²⁴ [REDACTED].

³²⁵ [REDACTED].

³²⁶ [REDACTED].

³²⁷ [REDACTED].

³²⁸ [REDACTED].

³²⁹ [REDACTED].

88.	Murat SIMIDŽIJA ³³⁰	A Chetnik ³³¹
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5. Nevesinje

The victims listed at nos.1-6 were murdered at or near Zijemlje primary school on or about 26 June 1992. The victims listed at nos. 7-34 were killed on or about 22 June 1992 and exhumed from a mass grave at Teleća Lastva. The victims listed at nos. 35-77 were killed at Lipovača on or about 22 June 1992. The victims listed at nos. 78 and 79 were last seen alive when detained by Serb forces at Boračko Jezero, killed during the Indictment period, and exhumed from a mass grave.³³²

#	Victim	Perpetrator(s)
1.	BARALIJA, Hamid ³³³	“Serb soldiers” with green JNA uniforms ³³⁴ ; Šešeljevi were stationed at Zijemlje ³³⁵ and abuse was perpetrated by Serbs wearing Chetnik clothing ³³⁶
2.	BRAJEVIĆ, Juso ³³⁷	
3.	CATIĆ, Mujo ³³⁸	
4.	CATIĆ, Ibro ³³⁹	
5.	CATIĆ, Đulsa ³⁴⁰	
6.	CATIĆ, Ema or Emina ³⁴¹	
7.	ALIBAŠIĆ, Salih ³⁴²	[REDACTED]; ³⁴³ [REDACTED]; ³⁴⁴ military police under Milenko SAVIĆ; ³⁴⁵ [REDACTED]; ³⁴⁶ Boro ANTELJ ³⁴⁷
8.	ALIBAŠIĆ, Mustafa ³⁴⁸	
9.	ALIČIĆ, Alija b.1956 ³⁴⁹	
10.	ALIČIĆ, Alija b.1923 ³⁵⁰	
11.	ALIČIĆ, Hava ³⁵¹	

³³⁰ [REDACTED].

³³¹ [REDACTED].

³³² Indictment, para.27, Annex X; Pre-Trial Brief, paras.120-121. KUJAN testified to the accuracy of the list of victims in Annex X; Kujan, T.9650-9652. **ŠEŠELJ** conceded the accuracy of the list of victims in Exh.P00525; T.9668.

³³³ [REDACTED]; Exh.P00525, p.2.

³³⁴ [REDACTED].

³³⁵ [REDACTED].

³³⁶ [REDACTED]; 8925-8926.

³³⁷ [REDACTED]; Exh.P00525, p.2.

³³⁸ [REDACTED]; Exh.P00525.

³³⁹ [REDACTED]; Exh.P00525.

³⁴⁰ [REDACTED]; Exh.P00525.

³⁴¹ [REDACTED]; Exh.P00525.

³⁴² [REDACTED]; Exh.P00525, p.1.

³⁴³ [REDACTED].

³⁴⁴ [REDACTED].

³⁴⁵ [REDACTED].

³⁴⁶ [REDACTED].

³⁴⁷ [REDACTED].

12.	ALIČIĆ, Alija b.1952 ³⁵²	
13.	ALIČIĆ, Mehmed ³⁵³	
14.	ALIČIĆ, Bećir ³⁵⁴	
15.	BRAJEVIĆ, Alija ³⁵⁵	
16.	BRAJEVIĆ, Kasim ³⁵⁶	
17.	BRAJEVIĆ, Mustafa ³⁵⁷	
18.	ČOPELJ, Šerif ³⁵⁸	
19.	ČOPELJ, Mustafa ³⁵⁹	
20.	ČOPELJ, Dervo ³⁶⁰	
21.	ČOPELJ, Esad ³⁶¹	
22.	ČOPELJ, Ibrahim ³⁶²	
23.	KASUNOVIĆ, Ibrahim ³⁶³	
24.	MAHINIĆ, Alija ³⁶⁴	
25.	MAHINIĆ, Adem ³⁶⁵	
26.	MAHINIĆ, Hajdar ³⁶⁶	
27.	OMERIKA, Amina ³⁶⁷	
28.	PLOSKIĆ, Mustafa ³⁶⁸	
29.	PLOSKIĆ, Hasan ³⁶⁹	
30.	PLOSKIĆ, Huso ³⁷⁰	
31.	PLOSKIĆ, Avdo ³⁷¹	
32.	ŠIPKOVIĆ, Asim ³⁷²	
33.	ŠIPKOVIĆ, Habib ³⁷³	
34.	ŠIPKOVIĆ, Hasan ³⁷⁴	
35.	ALIBAŠIĆ, Emina ³⁷⁵	

- ³⁴⁸ [REDACTED]; Exh.P00525, p.1.
³⁴⁹ [REDACTED]; Exh.P00525, p.2.
³⁵⁰ [REDACTED]; Exh.P00525, p.1.
³⁵¹ [REDACTED]; Exh.P00525, p.2.
³⁵² [REDACTED]; Exh.P00525, p.2.
³⁵³ [REDACTED]; Exh.P00525, p.2.
³⁵⁴ [REDACTED]; Exh.P00525, p.2.
³⁵⁵ [REDACTED]; Exh.P00525, p.2.
³⁵⁶ [REDACTED]; Exh.P00525, p.2.
³⁵⁷ [REDACTED]; Exh.P00525, p.2.
³⁵⁸ [REDACTED]; Exh.P00525, p.2.
³⁵⁹ [REDACTED]; Exh.P00525, p.2.
³⁶⁰ [REDACTED]; Exh.P00525, p.2.
³⁶¹ [REDACTED]; Exh.P00525, p.2. *See also* [REDACTED].
³⁶² [REDACTED]; Exh.P00525, p.2.
³⁶³ [REDACTED]; Exh.P00525, p.2.
³⁶⁴ [REDACTED]; Exh.P00525, p.2.
³⁶⁵ [REDACTED]; Exh.P00525, p.2.
³⁶⁶ [REDACTED]; Exh.P00525, p.2 (as Ajdar MAHINIĆ).
³⁶⁷ [REDACTED]; Exh.P00525, p.2.
³⁶⁸ [REDACTED]; Exh.P00525, p.2.
³⁶⁹ [REDACTED]; Exh.P00525, p.2.
³⁷⁰ [REDACTED]; Exh.P00525, p.2.
³⁷¹ [REDACTED]; Exh.P00525, p.2.
³⁷² [REDACTED]; Exh.P00525, p.2.
³⁷³ [REDACTED]; Exh.P00525, p.2.
³⁷⁴ [REDACTED]; Exh.P00525, p.2.
³⁷⁵ [REDACTED]; Exh.P00525, p.1.

36.	ALIBAŠIĆ, Senada ³⁷⁶	
37.	ALIBAŠIĆ, Habiba ³⁷⁷	
38.	ALIČIĆ, Saja ³⁷⁸	
39.	ALIČIĆ, Fadila ³⁷⁹	
40.	ALIČIĆ, Nefa ³⁸⁰	
41.	ALIČIĆ, Mejra b.1954 ³⁸¹	
42.	ALIČIĆ, Habiba ³⁸²	
43.	ALIČIĆ, Mejra b.1956 ³⁸³	
44.	ALIČIĆ, Husein/Huso ³⁸⁴	
45.	ALIČIĆ, Merima ³⁸⁵	
46.	ALIČIĆ, Nazika ³⁸⁶	
47.	ALIČIĆ, Lejla ³⁸⁷	
48.	ALIČIĆ, Saudin ³⁸⁸	
49.	BRAJEVIĆ, Đulsa ³⁸⁹	
50.	KASUNOVIĆ, Tidža ³⁹⁰	
51.	KASUNOVIĆ, Čamil ³⁹¹	
52.	MAHINIĆ, Lejla ³⁹²	
53.	MAHINIĆ, Omer ³⁹³	
54.	MAHINIĆ, Ibrahim ³⁹⁴	
55.	MAHINIĆ, Ajla ³⁹⁵	
56.	MAHINIĆ, Hava ³⁹⁶	
57.	MAHINIĆ, Munira ³⁹⁷	
58.	MAHINIĆ, Fata ³⁹⁸	
59.	MAHINIĆ, Fehma ³⁹⁹	
60.	OMERIKA, Hasinija ⁴⁰⁰	

³⁷⁶ [REDACTED]; Exh.P00525, p.1.

³⁷⁷ [REDACTED]; Exh.P00525, p.1.

³⁷⁸ [REDACTED]; Exh.P00525, p.1.

³⁷⁹ [REDACTED]; Exh.P00525, p.1.

³⁸⁰ Exh.P00525, p.1.

³⁸¹ [REDACTED]; Exh.P00525, p.1.

³⁸² [REDACTED]; Exh.P00525, p.1.

³⁸³ [REDACTED]; Exh.P00525, p.1.

³⁸⁴ [REDACTED]; Exh.P00525, p.1.

³⁸⁵ [REDACTED]; Exh.P00525, p.1.

³⁸⁶ [REDACTED]; Exh.P00525, p.1.

³⁸⁷ [REDACTED]; Exh.P00525, p.1.

³⁸⁸ [REDACTED]; Exh.P00525, p.1.

³⁸⁹ [REDACTED]; Exh.P00525, p.1.

³⁹⁰ [REDACTED]; Exh.P00525, p.1.

³⁹¹ [REDACTED]; Exh.P00525, p.1.

³⁹² [REDACTED]; Exh.P00525, p.1.

³⁹³ [REDACTED]; Exh.P00525, p.1.

³⁹⁴ [REDACTED]; Exh.P00525, p.1.

³⁹⁵ [REDACTED]; Exh.P00525, p.1.

³⁹⁶ [REDACTED]; Exh.P00525, p.1.

³⁹⁷ [REDACTED]; Exh.P00525, p.1.

³⁹⁸ [REDACTED]; Exh.P00525, p.1.

³⁹⁹ [REDACTED]; Exh.P00525, p.1.

⁴⁰⁰ [REDACTED]; Exh.P00525, p.1.

61.	OERIKA, Amina ⁴⁰¹	
62.	PLOSKIĆ, Agan ⁴⁰²	
63.	PLOSKIĆ, Samra ⁴⁰³	
64.	PLOSKIĆ, Amra ⁴⁰⁴	
65.	PLOSKIĆ, Ajla ⁴⁰⁵	
66.	PLOSKIĆ, Amar ⁴⁰⁶	
67.	PLOSKIĆ, Hajra ⁴⁰⁷	
68.	PLOSKIĆ, Mejra ⁴⁰⁸	
69.	PLOSKIĆ, Emin ⁴⁰⁹	
70.	PLOSKIĆ, Sehija ⁴¹⁰	
71.	ŠIPKOVIĆ, Ferida ⁴¹¹	
72.	ŠIPKOVIĆ, Nura ⁴¹²	
73.	ŠIPKOVIĆ, Huso ⁴¹³	
74.	ŠIPKOVIĆ, new-born ⁴¹⁴	
75.	ČOPELJ, Zejna ⁴¹⁵	
76.	ČOPELJ, Alka ⁴¹⁶	
77.	ČOPELJ, Nermina ⁴¹⁷	
78.	MAHINIĆ, Fadila ⁴¹⁸	
79.	MAHINIĆ, Mirsada ⁴¹⁹	Petar DIVJAKOVIĆ ⁴²⁰

⁴⁰¹ [REDACTED]; Exh.P00525, p.1.

⁴⁰² [REDACTED]; Exh.P00525, p.1.

⁴⁰³ [REDACTED]; Exh.P00525, p.1.

⁴⁰⁴ [REDACTED]; Exh.P00525, p.1.

⁴⁰⁵ [REDACTED]; Exh.P00525, p.1.

⁴⁰⁶ [REDACTED]; Exh.P00525, p.1.

⁴⁰⁷ [REDACTED]; Exh.P00525, p.1.

⁴⁰⁸ [REDACTED]; Exh.P00525, p.1.

⁴⁰⁹ [REDACTED]; Exh.P00525, p.1.

⁴¹⁰ [REDACTED]; Exh.P00525, p.1.

⁴¹¹ [REDACTED]; Exh.P00525, p.1.

⁴¹² [REDACTED]; Exh.P00525, p.1.

⁴¹³ [REDACTED]; Exh.P00525, p.1.

⁴¹⁴ [REDACTED]; Exh.P00525, p.1.

⁴¹⁵ [REDACTED]; Exh.P00525, p.1.

⁴¹⁶ [REDACTED]; Exh.P00525, p.1.

⁴¹⁷ [REDACTED]; Exh.P00525, p.1.

⁴¹⁸ [REDACTED].

⁴¹⁹ [REDACTED].

⁴²⁰ [REDACTED].

ANNEX C

TORTURE AND CRUEL TREATMENT COUNTS 8-9

1. Vukovar

In November 1991, torture and cruel treatment took place at the described detention facilities.¹

#	Detention facility	Perpetrator(s)
1.	Velepromet Warehouse ²	Šešeljevci(Chetniks/ Chetnik Volunteers) ³ including: Marko Crevar; ⁴ “Topola”; ⁵ Predrag Milojevic aka “Kinez”; ⁶ Mile Macesic ⁷ Army, JNA and military police generally; ⁸ Reservists, including: Miroljub DRAĆA ⁹ ; TO ¹⁰ , including: Sasa Radak ¹¹ ; Zoran Maslakovic aka Kiza; ¹² People from Vukovar. ¹³
2.	Ovčara Farm ¹⁴	Šešeljevci, including: Chetniks, generally¹⁵, Volunteers, generally¹⁶including, Milan LANČUŽANIN(aka Kameni) ¹⁷ ; Pedrag DRAGOVIC (aka Čeča) ¹⁸ ; Predrag MILOJEVIĆ (aka Kinez) ¹⁹ ;

¹ Paras. 29(a), 30; PTB, paras.69-71.

² [REDACTED]; Čakalić, T.4950-4951; Karlović, T.4742, 4748-4749; Stojanović, T.9686; Exh.P00526, paras.30-32; Exh.P00527, para.21; Exh.P00528, paras.44, 46-47; Berghofer, T.4864, 4873-4874; Exh.P00278, paras.73-77; Bilić, T.11808-11810; Stoparić, T.2343-2347; [REDACTED].

³ [REDACTED]; Exh.P00527, para.21; Exh.P00528, para.44; [REDACTED]; Karlović, T.4736-4737, 4742; [REDACTED]

⁴ [REDACTED]

⁵ [REDACTED]; Stoparić, T.2344-2347, 2615-2618.

⁶ Exh.P00526, paras. 31-32; Exh.P00528, para. 47.

⁷ [REDACTED]

⁸ Karlović, T.4736; Čakalić, T.4971.

⁹ Exh.P00278, paras.76-77.

¹⁰ Karlović, T.4736; Exh.P00526, paras.31-32; Exh.P00528, paras.46-47; [REDACTED].

¹¹ [REDACTED]

¹² [REDACTED]

¹³ Stojanović, T.9686-9687; [REDACTED].

¹⁴ [REDACTED]; Karlović, T.4718-4719, 4723-4725, 4729, 4739-4743; Berghofer, T.4863-4864, 4870-4871; Exh.P00278, paras.45-68; [REDACTED]; Čakalić, T.4929, 4971-4972, 4930-4932; [REDACTED].

¹⁵ [REDACTED]; Karlović, T.4723.

¹⁶ [REDACTED]; Stoparić, T.2357-2358.

¹⁷ [REDACTED]

¹⁸ [REDACTED]

¹⁹ [REDACTED]

	<p> Ljuboja MARE²⁰ ; Major KATIC²¹; Djordje SOSIĆ (aka Žorz or Čića)²²; Zoran DASIĆ²³; Dragica MASTIKOSA²⁴; Nikola DJUKIĆ (aka Gidza)²⁵; TOPOLA²⁶; “Dragica;”²⁷ Nada KALABA²⁸ TO Members²⁹, including: Miroљjub VUJOVIĆ³⁰; Stanko VUJANOVIĆ³¹; Goran MUGOŠA (aka “Kuštro”) ³²; Milan BULIĆ (aka Bulidza)³³; </p>
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²⁰ [REDACTED]

²¹ [REDACTED]

²² [REDACTED]

²³ [REDACTED]

²⁴ [REDACTED]

²⁵ [REDACTED]

²⁶ [REDACTED]; VS-015, T.2352-2357; [REDACTED].

²⁷ [REDACTED]

²⁸ [REDACTED]

²⁹ [REDACTED]; Stoparić, T.2357-2358.

³⁰ [REDACTED]; Exh.P00604, paras.10-11, 27, 34; Vukašinović, T.12319-12327; [REDACTED].

³¹ Exh.P00604, paras.10-11, 27, 34; Vukašinović, T.12325-12327; [REDACTED]

³² Exh. P00278, paras.46, 48; [REDACTED].

³³ Exh.P00278, paras.48, 51- 52 (stated as MILOS BULIC); Čakalić, T.4929; [REDACTED].

³⁴ Exh.P00604, para.27.

³⁵ [REDACTED]

³⁶ [REDACTED]

³⁷ [REDACTED]

³⁸ [REDACTED]

³⁹ [REDACTED]

⁴⁰ [REDACTED]

⁴¹ [REDACTED]

⁴² [REDACTED]

⁴³ [REDACTED]

⁴⁴ [REDACTED]

⁴⁵ [REDACTED]

⁴⁶ [REDACTED]

⁴⁷ [REDACTED]

⁴⁸ [REDACTED]

⁴⁹ [REDACTED]

⁵⁰ [REDACTED]

⁵¹ The people doing the beatings were “reservists and paramilitaries. There were five different uniforms there but they were all mixed up together and they were all participating in that beating.” Exh.P00278, paras.49-50; [REDACTED]

⁵² Exh.P00278, paras.59-63; Čakalić, T.4929.
[REDACTED]; Karlović, T.4718-4719, 4723.

⁵⁴ [REDACTED]

⁵⁵ [REDACTED]

⁵⁶ VS-002, T.6657; Karlović, T.4718-4721; 4724; [REDACTED].

⁵⁷ [REDACTED]

	<p> Mirko VOJNOVIĆ (aka Čapalo)³⁴; Vujo ZLATAR³⁵; Jovica KRESOJEVIĆ³⁶; Sasa RADAK (aka Cetnje)³⁷; Božo (or Boro) LATINOVIĆ (or Krajisnik)³⁸; "DRACA"³⁹; PERIĆ⁴⁰; Ivica HUSNIK⁴¹; Stevan ZORIĆ (aka Little Zorić)⁴²; Pero CIGAN⁴³; Damir SIRETA⁴⁴; NIKOLIĆ Slavko aka Gipsy⁴⁵; Slavko CIGAN⁴⁶; Mica DJANKOVIĆ⁴⁷; Miroslav DJANKOVIĆ (aka Djani)⁴⁸; Nada KALABA⁴⁹; "Zoran from Karaburma"⁵⁰ Reservists⁵¹, including: Slavko DOKMANOVIĆ⁵²; JNA Soldiers/Officers⁵³, including: Elvir HADZIC⁵⁴; VIDACEK⁵⁵; Spasoje PETKOVIĆ aka STUKA⁵⁶; RADIĆ⁵⁷ </p>
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2. Zvornik

Between April and July 1992, torture and cruel treatment took place at the described detention facilities.⁵⁸

#	Detention facility	Perpetrator(s)
1.	Standard Shoe Factory ⁵⁹	Šešeljević, including members of the Loznica Group Lale and Mačak ⁶⁰
2.	Ekonomija Farm ⁶¹	Šešeljević including members of the Loznica Group Roki and Lale, ⁶² and Major Toro, Vojvoda Čele, Zoks and Pufta; ⁶³ Petko Hajdulović ⁶⁴
3.	Ciglana	Šešeljević including Zoks, Pufta, ⁶⁶ and member of the Loznica

⁵⁸ Indictment, paras.28, 29(e), 30; Pre-trial Brief, paras.93-94.

⁵⁹ VS-1013, T.5222-5226.

⁶⁰ VS-1013, T.5222-5226; [REDACTED].

⁶¹ VS-1013, T.5230-5237, 5239; [REDACTED]; Kopic, Exh.P00362, pp.3-7; Kopic, T.5892-5894, 5907-5908, 5911; VS-1015, T.5406-5409, 5411-5415, 5418; [REDACTED].

⁶² VS-1013, T.5230, 5237; Kopic, T.5913-5914, 5920; Kopic, Exh.P00362, pp.4-7; VS-1015, T.5406-5408.

⁶³ VS-1013, T.5235-5237, 5239; VS-1015, T.5404, 5406, 5412-5415, 5418-5419; Kopic, T.5892-5893, 5907-5908, 5911-5913, 5918-5920; Kopic, Exh.P00362, pp.3-7; [REDACTED]

⁶⁴ Kopic, T.5894; Kopic, Exh.P00362, p.6; [REDACTED].

	Factory ⁶⁵	Group Roki; ⁶⁷ Niški ⁶⁸
4.	Drinjača Dom Kulture ⁶⁹	A group looking like Arkan's Men; ⁷⁰ Šešeljevi ⁷¹
5.	Karakaj Technical School ⁷²	Serb forces including soldiers in camouflage uniforms; ⁷³ Marko PAVLOVIĆ from the Serb TO and Serb civilian authorities; ⁷⁴ Marko RAKIĆ aka Chetnik, Vljeko IVANOVIĆ, Rajo and Mijo; ⁷⁵ Šešeljevi from Loznica ⁷⁶
6.	Gero's Slaughter house ⁷⁷	Serb forces including soldiers in camouflage uniforms, ⁷⁸ Serb TO, Serb civilian authorities, Niški's men, and Šešeljevi including Yellow Wasps and Pivarski's men, ⁷⁹
7.	Čelopek Dom Kulture ⁸⁰	Šešeljevi including Yellow wasps Dušan VUČKOVIĆ aka Repić and Lopov, Zoks, Major, Bucu and Pufta; ⁸¹ soldiers in military uniform ⁸²

3. Greater Sarajevo

(a) Ilijaš

Between April 1992 and September 1993, torture and cruel treatment took place at the described detention facility.⁸³

#	Detention facility	Perpetrator(s)
1.	Iskra warehouse, Podlugovi ⁸⁴	Serb forces including MUP members; Serb civilian authorities; Vasilije VIDOVIĆ aka Vaske and his Šešeljevi , one identified as Mica; local Serbs ⁸⁵

⁶⁵ [REDACTED]; Kopic, Exh.P00362, pp.7-8; VS-1015, T.5405-5406, 5418-5421, 5429-5435.

⁶⁶ VS-1013, 5248-5252; [REDACTED]; VS-1015, T.5429-5430, 5433-5436; Kopic, Exh.P00362, pp.7-8.

⁶⁷ VS-1013, T.5246; 5248-5252; VS-1015, T.5429, 5433-5436; Kopic, Exh.P00362, pp.7-8.

⁶⁸ Kopic, Exh.P00362, p.7.

⁶⁹ VS-1064, T.8704-8715.

⁷⁰ VS-1064, T.8704-8709.

⁷¹ VS-1064, T.8711-8712, 8717-8718, 8737-8739.

⁷² [REDACTED].

⁷³ [REDACTED].

⁷⁴ [REDACTED].

⁷⁵ [REDACTED].

⁷⁶ Exh.P00971, pp.3-4, 7.

⁷⁷ [REDACTED]; Exh.P00824; [REDACTED]

⁷⁸ [REDACTED].

⁷⁹ [REDACTED]; VS-2000, T.14026-14028; [REDACTED].

⁸⁰ VS-1065, T.6310-6313, [REDACTED]; VS-1013, T.5255-5256; [REDACTED]

⁸¹ VS-1065, 6315-6316, 6318-6320, 6322, 6341; [REDACTED]; VS-1013, T.5255-5256.

⁸² VS-1065, T.6313.

⁸³ Indictment, Paras.28, 29(g), 30; Pre-Trial Brief, para.99.

⁸⁴ VS-1055, T.7834-7837.

⁸⁵ VS-1055, T.7832-7837.

(b) Vogošća

Between April 1992 and September 1993, torture and cruel treatment took place at the described detention facility.⁸⁶

#	Detention facility	Perpetrator(s)
1.	Planja's house, Svrake ⁸⁷	Serb forces including members of the VRS, commanded by Branko VLAČO and his deputy Nebojsa ŠPIRIĆ, Serb civilian authorities and Vogošća War Commission presided by Nikola POPLAŠEN and Vasilije VIDOVIĆ aka Vaske's Šešeljevci ⁸⁸
2.	Forced labour at Semizovac Military Barracks ⁸⁹	VRS/TO members including Dragan JOSIPOVIĆ and Rajko JANKOVIĆ ⁹⁰

4. Mostar

Between April 1992 and June 1992, torture and cruel treatment took place at the described detention facilities.⁹¹

#	Detention facility	Perpetrator(s)
1.	Sutina ⁹²	Šešeljevci , Rajko JANJIĆ and Dragan ANTELJ; Major FNU UGLJEŠIĆ; ⁹³ Damir MIŠKIN, Siniša PALAVESTRA, and others including an unknown soldier who was a member of the White Eagles or "Šešelj's White Eagles" ⁹⁴ ; reservists and other armed non-local Chetniks who wore olive-green uniforms ⁹⁵
2.	Vrapčići ⁹⁶	Zdravko KANDIĆ ⁹⁷ , Šešeljevci including Srećko LNU; DIVJAKOVIĆ; local guards; Borislav MIŠKIN aka Džindža, Damir ANTELJ and Rajko JANJIĆ ⁹⁸ , Mico BUNJAS, ⁹⁹ a Bosnian from the Radical Party. ¹⁰⁰
3.	Zalik	Serb soldiers ¹⁰² including " Šešeljevci " ¹⁰³ ; Rajko JANJIĆ ¹⁰⁴ ; Milan

⁸⁶ Indictment, Paras.28, 29(g), 30; Pre-Trial Brief, para.103.

⁸⁷ VS-1055, T.7837-7842; Sejdić, T.8207-8208, 8408-8412; Exhs.P00464; P00975; [REDACTED]; AFIV-153.

⁸⁸ VS-1055, T.7837, 7839-7841; Sejdić, T.8410-8411, 8202, 8216-8217; Exhs.P00464; P00975; AFIV-152.

⁸⁹ Sejdić, T.8209-8210, 8173-8177, 8199-8203.

⁹⁰ Sejdić, T.8216-8217, 8346, 8201-8202.

⁹¹ Indictment, Paras.28, 29(j), 30; Pre-trial Brief, paras. 114-116.

⁹² [REDACTED]; Bilić, T.8990-8991.

⁹³ [REDACTED].

⁹⁴ [REDACTED].

⁹⁵ [REDACTED].

⁹⁶ E.g. Karišik, T.8777.

⁹⁷ [REDACTED].

⁹⁸ [REDACTED].

⁹⁹ Karišik, T.8777.

¹⁰⁰ VS-1067, T.15292.

	shelter ¹⁰¹	ŠKORO ¹⁰⁵ ; MIROSLAV LNU, ¹⁰⁶ ; Saša SAVIĆ, Milan SAVIĆ, and NNK (name not known); Major UGLJEŠIĆ; armed reservists including Dragan ANTELJ, Vojo PEJANOVIĆ ¹⁰⁷ ; Simo MIHIĆ ¹⁰⁸ ; Soldiers from Montenegro including Serbs named "Milos" and Vojo PAJOVIĆ, and one Šešeljevac from Novi Sad ¹⁰⁹
4.	JNA North Camp	JNA reservists, Milos RADONJIĆ ¹¹⁰ , FNU SAVIĆ ¹¹¹

5. Nevesinje

Between April 1992 and June 1992, torture and cruel treatment took place at the described detention facilities.¹¹²

#	Detention facility	Perpetrator(s)
1.	Kilavci ¹¹³	"Chetniks" ¹¹⁴ ; Radoslav SOLDO, Mile PEJIĆ, Petar DIVJAKOVIĆ ¹¹⁵
2.	Boračko Jezero ¹¹⁶	Petar DIVJAKOVIĆ, Arsen GRAHOVAC and "Chetniks", ¹¹⁷ a member of the Karadorde unit, Radivoj SALDO and others ¹¹⁸ , Serbian soldiers ¹¹⁹
3.	Zijemlje primary school ¹²⁰	Approximately 10 -12 Serb soldiers in camouflage or JNA uniforms and/or sajaka caps and cockades, including White Eagles, ¹²¹ Šešeljevci ¹²² and Serbs wearing Chetnik clothing. ¹²³
4.	Nevesinje SUP building ¹²⁴	Kićo SAVIĆ, ¹²⁵ Petar DIVJAKOVIĆ, ¹²⁶ members of Serb forces including two soldiers ages about 20 and 40 ¹²⁷

¹⁰¹ [REDACTED]; Bilić, T.8961.

¹⁰² [REDACTED].

¹⁰³ Bilić, T.8965-8966, 8975, 9022-9024 (open); Karišik, T.8768.

¹⁰⁴ [REDACTED].

¹⁰⁵ [REDACTED]; Karišik, T.8768.

¹⁰⁶ [REDACTED].

¹⁰⁷ [REDACTED].

¹⁰⁸ [REDACTED].

¹⁰⁹ Bilić, T.8965; [REDACTED].

¹¹⁰ [REDACTED].

¹¹¹ Karišik, T.8771.

¹¹² Indictment, para.29(k); Pre-Trial Brief, paras.120-121.

¹¹³ AFIV-188, 189; [REDACTED].

¹¹⁴ [REDACTED].

¹¹⁵ [REDACTED].

¹¹⁶ [REDACTED].

¹¹⁷ [REDACTED].

¹¹⁸ [REDACTED].

¹¹⁹ [REDACTED].

¹²⁰ [REDACTED].

¹²¹ [REDACTED].

¹²² [REDACTED].

¹²³ [REDACTED]; VS-1052, T. 8925-8926.

¹²⁴ [REDACTED].

¹²⁵ [REDACTED].

¹²⁶ [REDACTED].

¹²⁷ [REDACTED].

ANNEX D

DEPORTATION COUNT 10

1. Vukovar

Between August 1991 and May 1992, non-Serbs were deported.¹

#	Incident	Border Crossed	Perpetrator(s)
1.	Various Bus Transports ²	Serbia, Bosnia	Serb Forces ³
2.	1,000 prisoners transferred from Velepromet to Sremska Mitrovica ⁴ ; including Vesna Bosanac, Dr. Njavro and Anto Arić sent to Sremska Mitrovica and subsequently exchanged. ⁵ Berghofer transferred to Sremska Mitrovica only to be exchanged four months later. ⁶	Serbia	Serb Forces ⁷
3.	In Borovo Komerc, within Vukovar Municipality, of the 1500 detainees who surrendered, the women and children were sent to “Croatian territory.” ⁸	Bosnia	Serb Forces, including “Radicals” ⁹
4.	The JNA began to transfer civilians from Velepromet to the direction of Šid in Serbia. ¹⁰	Serbia	JNA ¹¹
5.	Woman in Bogdanovci forced to Petrovci and then to Serbia ¹²	Serbia	JNA ¹³
6.	[REDACTED] sent from Vukovar to Stari Jankovci, Croatia to Sid to Sremska Mitrovica ¹⁴	Serbia	JNA soldiers and reservists ¹⁵

¹ Indictment, paras. 31-33; PTB para.67

² Radić, T.11991.

³ Radić, T.11991.

⁴ [REDACTED].

⁵ [REDACTED].

⁶ Exh.P00278, paras.78-79.

⁷ [REDACTED]; Exh.P00278, para78-79.

⁸ [REDACTED].

⁹ [REDACTED].

¹⁰ Exh.P00528, para. 47.

¹¹ Exh.P00528, para. 47.

¹² Exh.P00183, pp.6-7.

¹³ Exh.P00183, pp.6-7.

¹⁴ [REDACTED].

¹⁵ [REDACTED].

2. Zvornik

Between March 1992 and September 1993, non-Serbs were deported.¹⁶

#	Incident	Border Crossed	Perpetrator(s)
1.	Non-Serbs from Zvornik town were put on buses and forced to leave, others fled in fear of the advancing Serb forces ¹⁷	Serbia	Serb forces including Šešeljević and Arkan's men ¹⁸
2.	1822 non-Serbs from Kozluk were expelled from their homes, forced on buses and transported to Serbia and from there to other countries ¹⁹	Serbia	Serb forces including members of the army, police, Serb TO, Arkan's men, Serb civilian authorities and Šešeljević including Yellow Wasps ²⁰
3.	Non-Serbs from Radakovac were forced to give up their property to Serb authorities, were put on buses and transported to Serbia and from there to other countries. ²¹	Serbia	Chetniks ²²

¹⁶ Indictment, paras.31-32; Pre-Trial Brief, para.93.

¹⁷ VS-1062, T.5962-5964; VS-1013, T.5374; [REDACTED] Exh.P00955, p.3; Bošković, Exh.P00836, para.21;

¹⁸ VS-1062, T.5960-5964; VS-1013, T.5194.

¹⁹ Banjanović, T.12448-12466, 12471-12472; Exhs.P00664; P00665; P00666; P00667; P01347, pp.4-5; VS-1013, T.5248.

²⁰ Banjanović, T.12448-12452, 12458, 12464.

²¹ [REDACTED]

²² [REDACTED]

FORCIBLE TRANSFER COUNT 11

1. Vukovar

Between August 1991 and May 1992, non-Serbs were forcibly transferred.²³

#	Incident	Perpetrator(s)
1.	Non-Serb women, elderly and children were transported out by bus and attempted to go to Croatian held territory ²⁴ , Women and children evacuated from Vukovar due to heavy shelling ²⁵	Serb forces, JNA ²⁶
2.	Various bus transports ²⁷	JNA and Šešeljevi ²⁸
3.	Near total flight of the population of Vukovar due to bombardment ²⁹	Serb Forces ³⁰
4.	People left Erdut after the village was shelled with Mortars ³¹	JNA ³²
5.	Bus Transports of women children and elderly ³³	JNA ³⁴
6.	Elderly people, women and children at Modateks waiting to be transferred to "Croatia." ³⁵	JNA, Šešeljevi ³⁶

2. Zvornik

Between March 1992 and September 1993, non-Serbs were forcibly transferred.³⁷

#	Incident	Perpetrator(s)
1.	Expulsion of non-Serbs from Zvornik town during the attack. Many non-Serbs fled in fear of the advancing Serb forces ³⁸	Serb forces including Šešeljevi, Arkan's men and Serb Municipal authorities ³⁹

²³ Indictment, paras 31-33; PTB para.67.

²⁴ [REDACTED].

²⁵ [REDACTED].

²⁶ [REDACTED].

²⁷ Radić, T.11991; [REDACTED].

²⁸ Radić, T.11991.

²⁹ Exh.P01291; [REDACTED]; Exh.P00632, p.42, 79; Radić, T.11977-11978; [REDACTED]; Exh.P00183, p.7.

³⁰ Radić, T.11978.

³¹ Adjudicated Facts Decision, 8-2-10, number 56.

³² Adjudicated Facts, 8-2-10, numbers 102; [REDACTED]; Exh.P00603, paras.9-10; Exh.P00278, para.7; VS-002, T.6461. See also [REDACTED].

³³ Exh.P00604, para.21.

³⁴ Exh.P00604, para.21.

³⁵ Karlovic, T.4733.

³⁶ Karlović, T.4733.

³⁷ Indictment, paras.31-32; Pre-Trial Brief, para.93.

³⁸ VS-1013, T.5192, 5374; [REDACTED]; Exh.P00955, p.3; Bošković, Exh.P00836, para.21; Exh.P00959, p.16.

³⁹ VS-1062, T.5960-5964; VS-1013, T.5194; Exh.P00955, p.3; Exh.P00959, p.16; Exh.P01347, p.7.

2.	About 500 non-Serbs from Divić were forcibly expelled from their homes ⁴⁰	Serb forces including members of the army and of the police and Serb Municipal authorities ⁴¹
3.	Non-Serbs from Drinjača, Kostijerevo, Sopotnik and Đevanje were expelled from their homes ⁴²	Serb forces including soldiers in JNA reservists uniform ⁴³
4.	About 4000 Non-Serbs from 13 villages, including Setici, were assembled in Klisa and expelled from their homes ⁴⁴	Serb forces including members of the MUP, VRS, Serb TO, police, paramilitaries ⁴⁵
5.	Non-Serbs from Đulići were expelled from their homes ⁴⁶	Serb forces including Arkan's men, Serb soldiers and Serbs in civilian clothes, Serb TO, police ⁴⁷

3. Greater Sarajevo

(a) Ilijaš

Between April 1992 and September 1993, non-Serbs were forcibly transferred.⁴⁸

#	Incident	Perpetrator(s)
1.	Forcible transfer of non-Serbs from Lješevo, fleeing because of persecutory environment and impending violence ⁴⁹	Serb forces including SDS Municipal Authorities, JNA, ⁵⁰ MUP, ⁵¹ Šešeljević including Vasilije VIDOVIĆ aka Vaske and his men ⁵²
2.	Forcible transfer following Serb attack on Lješevo by forcing non-Serbs out of their homes and to detention centres ⁵³	Serb civilian authorities, Serb TO, Šešeljević including Vasilije VIDOVIĆ aka Vaske and his men ⁵⁴

(b) Vogošća

Between April 1992 and September 1993, non-Serbs were forcibly transferred.⁵⁵

#	Incident	Perpetrator(s)
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⁴⁰ VS-1065, T.6301-6303; Exh.P01347, pp.4-5.

⁴¹ VS-1065, T.6301-6304.

⁴² VS-1064, T.8698-8704.

⁴³ VS-1064, T.8698-8703.

⁴⁴ [REDACTED].

⁴⁵ [REDACTED].

⁴⁶ [REDACTED].

⁴⁷ [REDACTED].

⁴⁸ Indictment, paras.31-32; Pre-Trial Brief, paras.98-99.

⁴⁹ [REDACTED]; VS-1055, T.7817-7818, 7803-7805; Džafić, Exh.P00840, para.3.

⁵⁰ VS-1055, T.7804-7805, 7816-7817, 7822-7825; Džafić, Exh.P00840, para.2; VS-1111, T.7695; Exhs.P00257, pp.4-5; P00966; [REDACTED].

⁵¹ VS-1111, T.7696-7701, 7703; VS-1055, T.7813-7814; 7817, 7876, T.7891.

⁵² VS-1055, T.7805, 7808-7810.

⁵³ VS-1055, T.7818-7821, 7832-7834, 7842; [REDACTED].

⁵⁴ [REDACTED]; VS-1055, T.7820-7821, 7818-7819, 7832, 7837; Džafić, Exh.P00840, paras.13, 15; [REDACTED].

⁵⁵ Indictment, paras.31-32; Pre-Trial Brief, para.102.

1.	Forcible transfer of non-Serbs from Svrake following Serb attack ⁵⁶	Serb forces including soldiers in JNA uniforms, Rajko JANKOVIĆ's unit in black camouflage uniforms, ⁵⁷ Serb TO ⁵⁸
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(c) Novo Sarajevo

Between April 1992 and September 1993, non-Serbs were forcibly transferred.⁵⁹

#	Incident	Perpetrator(s)
1.	Forcible transfer of non-Serbs from Grbavica through persecutory actions including killings and arbitrary searches ⁶⁰	Serb forces including JNA, Serb TO, Šešeljevi led by Slavko ALEKSIĆ and Branislav GAVRILOVIĆ aka Brne ⁶¹

(d) Ilidža

Between April 1992 and September 1993, non-Serbs were forcibly transferred.⁶²

#	Incident	Perpetrator(s)
1.	Forcible transfer of non-Serbs from Ilidža ⁶³	Šešeljevi and Ilidža Crisis Staff headed by Nedeljko PRSTOJEVIĆ ⁶⁴

5. Nevesinje

Between 14 and 26 June 1992, non-Serbs were forcibly transferred from Nevesinje.⁶⁵

#	Incident	Perpetrator
1.	Between 14 and 26 June 1992 Nevesinje was totally ethnically cleansed of the non Serb population by a campaign of attacks. ⁶⁶ Families left Postoljani, Donja Bijenja, and Gorna Bijenja out of fear ⁶⁷ and non-Serbs fled	Serb forces including Colonel PAREŽANIN and Dušan ČABRILO ⁷⁰ , Chetniks ⁷¹ , the VRS, local police, members of the Karadorde unit, Šešeljevi and ARKAN's units, and other Chetniks

⁵⁶ Sejdić, T.8166-8169, 8188-8189, 8191-8196, 8344; Exhs.P01346, p.11; P00975; P00463.

⁵⁷ Sejdić, T.8183-8186.

⁵⁸ Sejdić, T.8190.

⁵⁹ Indictment, paras.31-32; Pre-Trial brief, para.104

⁶⁰ VS-1060, T.8575-8577, 8603-8604; AFIV-157, 158.

⁶¹ VS-1060, T.8573-8574, 8581, 8591; Exhs.P00999, p.3; P01000, pp.8-10.

⁶² Indictment, paras.31-32; Pre-Trial Brief, para.95.

⁶³ AFIV-155; Exh.P00968, p.3.

⁶⁴ Exh.P00968.

⁶⁵ Indictment, para.31; Pre-Trial Brief, para.119.

⁶⁶ Kujan, Exh.P00524, p.8; [REDACTED].

⁶⁷ Kujan, Exh.P00524, pp.6-7.

⁶⁸ [REDACTED].

⁶⁹ [REDACTED]. See AFIV-181, 182.

⁷⁰ Kujan, Exh.P00524, p.7.

	Hrušta ⁶⁸ and Preješka. ⁶⁹	from Serbia and Montenegro, including Šešeljevi under Vojvoda VAKIĆ. ⁷² Some wore red berets and white eagle insignia. ⁷³
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6. Hrtkovci

Vojislav ŠEŠELJ, Ostojica SIBINČIĆ⁷⁴ and local Serbs forcibly transferred and/or deported the listed victims from Hrtkovci and surrounding areas:⁷⁵

#	Victim Number. ⁷⁶ Departure date	Name,	Destination (Counts charged)	Sources
1.	1. Anto AKRAP, ⁷⁷ 15-12-1992		Croatia(10,11)	Exh.P00568, p.6 #100
2.	2. Gordana ⁷⁸ AKRAP, 1992		Croatia(10,11)	Exh.P00566
3.	3. Ivan ⁷⁹ AKRAP, 1992		Croatia(10,11)	Exh.P00569, p.2 #1
4.	4. Kata AKRAP, 13-05-1992		Unknown(11)	[REDACTED]
5.	5. Marija AKRAP, 15-12-1992		Croatia(10,11)	Exh.P00568, p.6 #99
6.	6. Petar ⁸⁰ AKRAP, 1992		Croatia(10,11)	Exh.P00566
7.	7. Ankica AKRAPOVIC, ⁸¹ 1992		Croatia(10,11)	Exh.P00566
8.	8. Frano AKRAPOVIC, 1992		Croatia(10,11)	Exh.P00566
9.	9. Ivan AKRAPOVIC, 1992		Croatia(10,11)	Exh.P00569, p.2 #3
10.	10. Ivan AKRAPOVIC, 15-08-1992		Croatia(10,11)	Exh.P00568, p.6 #101
11.	11. Julisa AKRAPOVIC, 15-08-1992		Croatia(10,11)	Exh.P00568, p.6 #102

⁷¹ [REDACTED].

⁷² Kujan, Exh.P00524, p.6; Kujan, T.9657; Exh.P00029; [REDACTED]; Stojanović, T.2519-2521.

⁷³ Kujan, Exh.P00524, pp.6-7.

⁷⁴ Exh.P00547, pp.4, 9; [REDACTED]; Exh.P00555; Exh.P00556; Exh.P00557; Exh.P00559; [REDACTED]; Paulić, T.11918, T.11934; [REDACTED]; Baričević, T.10602-10605, 10621, 10623, 10674-10678; Ejić, T.10343, 10540; VS-067, T.15421, 15425; [REDACTED]

⁷⁵ Indictment, paras. 31-33; Pre-Trial Brief, paras.122-129.

⁷⁶ The victim number follows number assignments in Exh.P00566.

⁷⁷ [REDACTED].

⁷⁸ [REDACTED].

⁷⁹ [REDACTED].

⁸⁰ [REDACTED].

⁸¹ [REDACTED].

12.	12. Kristijan AKRAPOVIC, 15-08-1992	Croatia(10,11)	Exh.P00568, p.6 #104
13.	13. Krunoslav AKRAPOVIC, 15-08-1992	Croatia(10,11)	Exh.P00568, p.6 #106
14.	14. Marina AKRAPOVIC, 15-08-1992	Croatia(10,11)	Exh.P00568, p.6 #105
15.	15. Mario AKRAPOVIC, 15-08-1992	Croatia(10,11)	Exh.P00568, p.6 #103
16.	16. Nada AKRAPOVIC, 1992	Croatia(10,11)	Exh.P00566
17.	17. Stipo AKRAPOVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #4
18.	18. Alisa ANDRASEK, 13-03-1992	Unknown(11)	[REDACTED]
19.	19. Karolina BALIND, 1992	Unknown(11)	[REDACTED]
20.	20. Terezija BALIND, 1992	Yugoslavia (11)	Exh.P00569, p.2 #5
21.	21. Zeljko BALIND, 1992	Unknown(11)	[REDACTED]
22.	22. David BALOG, 1992	Croatia(10,11)	Exh.P00566
23.	23. Kristina BALOG, 1992	Croatia(10,11)	Exh.P00569, p.2 #6
24.	24. Ladislav BALOG, 1992	Croatia(10,11)	Exh.P00569, p.2 #7
25.	25. Ladislav BALOG, 1992	Croatia(10,11)	Exh.P00566
26.	27. Ivan BARANJ, 1992	Unknown(11)	[REDACTED]
27.	28. Marcela BARANJ, 1992	Unknown(11)	[REDACTED]
28.	29. Bojan BARANJI, 1992	Croatia(10,11)	Exh.P00566
29.	30. Igor BARANJI, 1992	Croatia(10,11)	Exh.P00566
30.	31. Karlo BARANJI, 1992	Croatia(10,11)	Exh.P00569, p.2 #8
31.	32. Marija BARANJI, 1992	Croatia(10,11)	Exh.P00566
32.	33. Aleksandra BARIC, ⁸² 11-08-1992	Unknown(11)	[REDACTED]
33.	34. Ana BARIC, 06-06-1992	Unknown(11)	[REDACTED]
34.	35. Ana BARIC, 1992	Croatia(10,11)	Exh.P00566
35.	36. Antun BARIC, 06-06-1992	Unknown(11)	[REDACTED]
36.	37. Antun BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #9
37.	38. Dario BARIC, 1992	Croatia(10,11)	Exh.P00566
38.	39. Duro BARIC, 06-06-1992	Croatia(10,11)	[REDACTED]

⁸² [REDACTED].

39.	40. Goran BARIC, 06-06-1992	Unknown(11)	[REDACTED]
40.	41. Hrvoje BARIC, 1992	Croatia(10,11)	Exh.P00566
41.	42. Ivan BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #10
42.	43. Ivana BARIC, 12-05-1992	Unknown(11)	[REDACTED]
43.	45. Julka BARIC, 1992	Croatia(10,11)	Exh.P00566
44.	46. Kata BARIC, 10-05-1992	Croatia(10,11)	[REDACTED]
45.	47. Ljiljana BARIC, 06-06-1992	Unknown(11)	[REDACTED]
46.	48. Ljubica BARIC, 1992	Unknown(11)	[REDACTED]
47.	49. Maja BARIC, 1992	Croatia(10,11)	Exh.P00566
48.	50. Marija BARIC, 1992	Croatia(10,11)	Exh.P00566
49.	51. Marija BARIC, 1992	Croatia(10,11)	Exh.P00566
50.	52. Marija BARIC, 22-05-1992	Unknown(11)	[REDACTED]
51.	53. Marko BARIC, 10-07-1992	Unknown(11)	[REDACTED]
52.	54. Nikola BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #16
53.	55. Pavao BARIC, 22-05-1992	Croatia(10,11)	[REDACTED]
54.	56. Petar BARIC, 1992	Croatia(10,11)	Exh.P00566
55.	57. Petar BARIC, 1992	Unknown(11)	[REDACTED]
56.	58. Petar BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #14
57.	59. Predrag BARIC, 1992	Croatia(10,11)	Exh.P00566
58.	60. Sanja BARIC, 06-06-1992	Unknown(11)	[REDACTED]
59.	61. Stipan BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #20
60.	62. Tomo BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #17
61.	63. Vinko BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #19
62.	64. Vlatko BARIC, 05-06-1992	Unknown(11)	[REDACTED]
63.	65. Zelimir BARIC, 11-08-1992	Unknown(11)	[REDACTED]
64.	66. Zeljka BARIC, 1992	Croatia(10,11)	Exh.P00566
65.	67. Zeljko BARIC, 08-05-1992	Croatia(10,11)	[REDACTED]
66.	68. Zvonko BARIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #18

67.	69. Franjo ⁸³ BARICEVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #21
68.	70. Iatica ⁸⁴ BARICEVIC, 16-05-1992	Unknown(11)	[REDACTED]
69.	71. Darko BARISIC (son of Zdenko), 1992	Croatia(10,11)	Exh.P00566; [REDACTED]
70.	72. Jasna BARISIC, 1992	Croatia(10,11)	Exh.P00566
71.	73. Matija BARISIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #22
72.	74. Roza BARISIC, 1992	Croatia(10,11)	Exh.P00566
73.	75. Zdenka BARISIC (daughter of Zdenko), 1992	Croatia(10,11)	Exh.P00566; [REDACTED]
74.	76. Zdenko BARISIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #23; [REDACTED]
75.	77. Gabor BARTOK, 1992	Croatia(10,11)	Exh.P00569, p.2 #24
76.	78. Gavra BARTOK, 21-10-1992	Croatia(10,11)	Exh.P00568, p.2 #56
77.	79. Jelena BARTOK, 1992	Croatia(10,11)	Exh.P00566
78.	80. Petar BARTOK, 1992	Croatia(10,11)	Exh.P00569, p.2 #25
79.	81. Ante BATISTA, 1992	Croatia(10,11)	Exh.P00569, p.2 #26
80.	82. Lucija BATISTA, 16-05-1992	Unknown(11)	[REDACTED]
81.	83. Marija BATISTA, 24-06-1992	Croatia(10,11)	Exh.P00568, p.6 #96
82.	84. Marjana BATISTA, 1992	Croatia(10,11)	Exh.P00566
83.	85. Mirjana BATISTA, 1992	Croatia(10,11)	Exh.P00566
84.	86. Nada BATISTA, 1992	Croatia(10,11)	Exh.P00566
85.	87. Nenad BATISTA, 1992	Croatia(10,11)	Exh.P00566
86.	89. Stipo BATISTA, 24-06-1992	Croatia(10,11)	Exh.P00568, p.6 #95
87.	90. Damir BEGIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #28
88.	91. Darko BEGIC, 1992	Croatia(10,11)	Exh.P00566
89.	92. Dubravko BEGIC, 1992	Croatia(10,11)	Exh.P00566
90.	93. Martin BEGIC, 28-05-1992	Unknown(11)	[REDACTED]
91.	94. Nikola BEGIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #29

⁸³ Ejčić, T.10390; Exh.P00558, p.3; [REDACTED].

⁸⁴ Ejčić, T.10390; Exh.P00558, p.3.

92.	95. Ruza BEGIC, 1992	Croatia(10,11)	Exh.P00566
93.	96. Tomislav BEGIC, 1992	Croatia(10,11)	Exh.P00566
94.	97. Verica BEGIC, 1992	Croatia(10,11)	Exh.P00566
95.	98. Ivan BERES, 1992	Croatia(10,11)	Exh.P00569, p.2 #30
96.	99. Julka BERES, 1992	Croatia(10,11)	Exh.P00566
97.	100. Miroslav BERES, 1992	Croatia(10,11)	Exh.P00566
98.	101. Monika BERES, 1992	Croatia(10,11)	Exh.P00566
99.	102. Simun BERES, 1992	Croatia(10,11)	Exh.P00569, p.2 #31
100.	103. Franjo BERISLAVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #32
101.	104. Josip BERISLAVIC, 1992	Croatia(10,11)	Exh.P00566
102.	105. Marija BERISLAVIC, 1992	Croatia(10,11)	Exh.P00566
103.	106. Miroslav BERISLAVIC, 10-06-1992	Unknown(11)	[REDACTED]
104.	107. Tina BERISLAVIC, 1992	Croatia(10,11)	Exh.P00566
105.	108. Tomislav BERISLAVIC, 10-06-1992	Unknown(11)	[REDACTED]
106.	109. Marko BILIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #33
107.	110. Ana BLAZIC, 1992	Unknown(11)	[REDACTED]
108.	111. Anica BLAZIC, 1992	Unknown(11)	[REDACTED]
109.	112. Antun BLAZIC, 1992	Unknown(11)	[REDACTED]
110.	113. Branimir BLAZIC, 1992	Unknown(11)	[REDACTED]
111.	114. Ilija BLAZIC, 1992	Unknown(11)	[REDACTED]
112.	115. Jelena BLAZIC, 1992	Unknown(11)	[REDACTED]
113.	116. Vesna BLAZIC, 1992	Unknown(11)	[REDACTED]
114.	117. Anka BOGOVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #34
115.	118. Georg BOGOVIC, 1992	Croatia(10,11)	Exh.P00566
116.	119. Ivan BOGOVIC, 1992	Croatia(10,11)	Exh.P00566
117.	120. Ivan BOGOVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #36
118.	121. Josip BOGOVIC, 29-05-1992	Croatia(10,11)	[REDACTED]
119.	122. Josip BOGOVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #35
120.	123. Lucija BOGOVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #37
121.	124. Mile BOGOVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #38

122.	125. Pavle BOGOVIC, 07-10-1992	Croatia(10,11)	Exh.P00568, p.1 #28
123.	126. Pavo BOGOVIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #39
124.	127. Peruska BOGOVIC, 1992	Croatia(10,11)	Exh.P00566
125.	128. Ruzica BOGOVIC, 1992	Croatia(10,11)	Exh.P00566
126.	129. Tomislav BOGOVIC, 30-05-1992	Croatia(10,11)	[REDACTED]
127.	130. Bara GRIZELJ, ⁸⁵ 1992	Croatia(10,11)	Exh.P00569, p.3 #80
128.	131. Anka BUTORAC, 1992	Croatia(10,11)	Exh.P00566
129.	132. Ivica BUTORAC, 1992	Croatia(10,11)	Exh.P00569, p.3 #40
130.	133. Stipa BUTORAC, 1992	Croatia(10,11)	Exh.P00569, p.3#41
131.	134. Dorijan CABRAIC, 1992	Croatia(10,11)	Exh.P00566
132.	135. Eduard CABRAIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #47
133.	136. Emil CABRAIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #48
134.	137. Helena CABRAIC, 1992	Croatia(10,11)	Exh.P00566
135.	138. Nada CABRAIC, 1992	Croatia(10,11)	Exh.P00566
136.	139. Puba CABRAIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #49
137.	140. Zelimir CABRAIC, 1992	Croatia(10,11)	Exh.P00566
138.	141. Zlata CABRAIC, 1992	Croatia(10,11)	Exh.P00566
139.	142. Brana CAKIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #42
140.	143. Josipa CAKIC, 26-06-1993	Croatia(10,11)	Exh.P00568, p.1 #24
141.	144. Mijat CAKIC, 20-02-1992	Unknown(11)	[REDACTED]
142.	145. Sasa CAKIC, 26-06-1993	Croatia(10,11)	Exh.P00568, p.1 #23
143.	146. Drazana CAVARA, 30-06-1992	Croatia(10,11)	Exh.P00568, p.1 #14
144.	147. Fabijan CAVARA, 13-02-1992	Croatia(10,11)	Exh.P00568, p.6 #98
145.	148. Ruza CAVARA, 13-02-1992	Croatia(10,11)	Exh.P00568, p.6 #97
146.	149. Anka CINDRIC, ⁸⁶ 1992 ⁸⁷	Croatia(10,11)	[REDACTED]

⁸⁵ As clarified by Exh.P00569, the victim's last name is GRIZELJ not BRIZELJ.

⁸⁶ [REDACTED].

147.	150. Davor CINDRIC, 1992	Croatia(10,11)	Exh.P00566
148.	151. Dragan CINDRIC, 1992	Croatia(10,11)	[REDACTED]
149.	152. Ivan CINDRIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #44
150.	153. Josip CINDRIC, 10-06-1992	Croatia(10,11)	[REDACTED]
151.	154. Mile CINDRIC, 1992	Croatia(10,11)	Exh.P00569, p.2 #45
152.	155. Danijel CIRIC, 24-05-1992	Unknown(11)	[REDACTED]
153.	156. Ana CORAK, 1992	Croatia(10,11)	Exh.P00569, p.3 #51
154.	157. Antun CORAK, 1992	Croatia(10,11)	Exh.P00569, p.3 #52
155.	158. Josip CORAK, 1992	Croatia(10,11)	Exh.P00569, p.3 #53
156.	159. Krunoslav CORAK, 1992	Croatia(10,11)	Exh.P00566
157.	160. Marija CORAK, 1992	Unknown(11)	[REDACTED]
158.	161. Marko CORAK, 22-04-1992	Unknown(11)	[REDACTED]
159.	162. Petar CORAK, 1992	Unknown(11)	[REDACTED]
160.	163. Vesna CORAK, 1992	Unknown(11)	[REDACTED]
161.	164. Ivan COSIC, ⁸⁷ 01-04-1992	Croatia(10,11)	Exh.P00568, p.6 #111
162.	165. Ivo COSIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #46
163.	166. Kata COSIC, 01-04-1992	Croatia(10,11)	Exh.P00568, p.6 #110
164.	167. Marko COSIC, 28-04-1992	Unknown(11)	[REDACTED]
165.	168. Adrijan DAMJANOVI, 1992	Croatia(10,11)	Exh.P00566
166.	169. Mirjana DAMJANOVI, 1992	Croatia(10,11)	Exh.P00566
167.	170. Zdenko DAMJANOVIĆ, 1992	Croatia(10,11)	Exh.P00566
168.	171. Zlata DAMJANOVIĆ, 01-03-1993	Croatia(10,11)	Exh.P00568, p.1 #15
169.	172. Zlatko DAMJANOVIĆ, 1992	Croatia(10,11)	[REDACTED]

⁸⁷ Exh.P00566 reflected formatting errors in the date 1992 for victim numbers: 149, 151, 176, 189, 199, 345, 352, 353, 406, 407, 434, 497, 505, 648, 650. *See* Tabeau, T.10834.

⁸⁸ [REDACTED].

170.	173. Andrija DERD, 1992	Croatia(10,11)	Exh.P00566
171.	174. Josipa DOBRIC, 1992	Croatia(10,11)	Exh.P00566
172.	175. Nikola DOBRIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #55
173.	176. Stjepan DOBRIC, 1992	Unknown(11)	[REDACTED]
174.	177. Nikola DOBROVAC, 1992	Unknown(11)	[REDACTED]
175.	178. Ljiljana DOGAN, 1992	Croatia(10,11)	Exh.P00566
176.	179. Marija DOGAN, 1992	Croatia(10,11)	Exh.P00566
177.	180. Mato DOGAN, 1992	Croatia(10,11)	Exh.P00569, p.3 #56
178.	181. Miroslav DOGAN, 1992	Croatia(10,11)	Exh.P00569, p.3 #57
179.	182. Nikola DOGAN, 1992	Croatia(10,11)	Exh.P00566
180.	183. Nikola DOGAN, 1992	Croatia(10,11)	Exh.P00569, p.3 #58
181.	184. Petar DOGAN, 1992	Croatia(10,11)	Exh.P00569, p.3 #59
182.	185. Rozalija DOGAN, 1992	Croatia(10,11)	Exh.P00566
183.	186. Marko DRAGICEVIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #60
184.	187. Marija DURDEVIC, 16-05-1992	Unknown(11)	[REDACTED]
185.	188. Ankica ENGERT, 07-06-1992	Croatia(10,11)	[REDACTED]
186.	189. Antun ENGERT, 1992	Unknown(11)	[REDACTED]
187.	191. Danijel ENGERT, 07-06-1992	Unknown(11)	[REDACTED]
188.	192. Franjo ENGERT (son of Antun), 07-06-1992	Croatia(10,11)	[REDACTED]
189.	193. Franjo ENGERT (son of Josip), 10-07-1992	Unknown(11)	[REDACTED]
190.	195. Josip ENGERT, 1992	Unknown(11)	[REDACTED]
191.	196. Marica ENGERT, 1992	Unknown(11)	[REDACTED]
192.	197. Nevenka ENGERT, 1992	Unknown(11)	[REDACTED]
193.	198. Pavica ENGERT, 1992	Croatia(10,11)	Exh.P00569, p.3 #63
194.	199. Rozina ENGERT, 1992	Unknown(11)	[REDACTED]
195.	200. Mirko FACKO, 30-07-1992	Unknown(11)	[REDACTED]
196.	201. Stjepan FACKO, 31-07-1992	Croatia(10,11)	[REDACTED]
197.	202. Tereza FACKO, 1992	Croatia(10,11)	Exh.P00569, p.3 #65

198.	203. Vera FACKO, 1992	Croatia(10,11)	Exh.P00566
199.	204. Klement FRAJHAUT, 1992	Croatia(10,11)	Exh.P00569, p.3 #66
200.	205. Daniela FUMIC, ⁸⁹ 1992	Croatia(10,11)	Exh.P00566
201.	206. Igor FUMIC, 1992	Croatia(10,11)	Exh.P00566
202.	207. Marija FUMIC (son of Josip), 1992	Croatia(10,11)	Exh.P00566
203.	208. Marija FUMIC (son of Marko), 1992	Croatia(10,11)	Exh.P00566
204.	209. Marko FUMIC, ⁹⁰ 1992	Croatia(10,11)	Exh.P00569, p.3 #67 ; [REDACTED]; Ejić, T.10407; Exh.P00558, p.9
205.	210. Milan FUMIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #68
206.	211. Verona GABOR, 1992	Unknown(11)	[REDACTED]
207.	212. Ljubica GALIJOT, 08-6-1992	Unknown(11)	[REDACTED]
208.	213. Ivan GALIJOT, ⁹¹ 1992	Croatia(10,11)	Exh.P00569, p.3 #69
209.	214. Jelica GALIJOT, 1992	Unknown(11)	[REDACTED]
210.	215. Mara GALIJOT, 1992	Croatia(10,11)	Exh.P00566
211.	216. Stjepan GALIJOT, 04-06-1992	Unknown(11)	[REDACTED]
212.	217. Tomislav GALIJOT (son of Ante), 08-01-1992	Unknown(11)	[REDACTED]
213.	218. Tomislav GALIJOT (son of Bozo), 04-06-1992	Croatia(10,11)	[REDACTED]
214.	219. Vinko GALIJOT, 1992	Croatia(10,11)	Exh.P00569, p.3 #71
215.	220. Ivan GOLEK, 1992	Croatia(10,11)	Exh.P00569, p.3 #72
216.	221. Kosana GOLEK, 1992	Croatia(10,11)	Exh.P00566
217.	222. Vera GOLER, 08-05-1992	Unknown(11)	[REDACTED]
218.	223. Josip GRACAN, 1992	Croatia(10,11)	Exh.P00569, p.3 #73
219.	224. Mara GRACAN, 1992	Croatia(10,11)	Exh.P00569, p.3 #75
220.	225. Zlata GRAHOVAC, 1992	Croatia(10,11)	Exh.P00569, p.3 #74
221.	226. Dragica GRDIC, 14-07-	Croatia(10,11)	Exh.P00568, p.1 #22

⁸⁹ [REDACTED].

⁹⁰ Ejić, T.10390 (Marko FUMIC and his family left Hrtkovci).

⁹¹ [REDACTED].

	1992		
222.	227. Ivan GRDIC, 14-07-1992	Croatia(10,11)	Exh.P00568, p.1 #21
223.	228. Jure GRDIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #76
224.	229. Marijan GRDIC, 30-03-1992	Unknown(11)	[REDACTED]
225.	231. Ljerka GRGIC, 1992	Unknown(11)	[REDACTED]
226.	232. Mato GRGIC, 1992	Croatia(10,11)	Exh.P00569, p.3 #77
227.	233. Ante GRIZELJ, 1992	Croatia(10,11)	Exh.P00569, p.3 #79
228.	234. Ante GRIZELJ, 1992	Croatia(10,11)	Exh.P00569, p.3 #78
229.	235. Antun GRIZELJ, 13-05-1992	Croatia(10,11)	[REDACTED]
230.	236. Barbara GRIZELJ, 09-07-1992	Unknown(11)	[REDACTED]
231.	237. Cvejo GRIZELJ, 1992	Croatia(10,11)	Exh.P00569, p.3 #81
232.	238. Ilija GRIZELJ, 1992	Croatia(10,11)	Exh.P00569, p.3 #82
233.	239. Ivan GRIZELJ, 13.05-1992	Croatia(10,11)	[REDACTED]
234.	240. Jasminka GRIZELJ, 1992	Unknown(11)	[REDACTED]
235.	241. Jelica GRIZELJ, 1992	Unknown(11)	[REDACTED]
236.	242. Kata GRIZELJ, 1992	Croatia(10,11)	Exh.P00566
237.	243. Kresimir GRIZELJ, 1992	Croatia(10,11)	Exh.P00566
238.	244. Krunoslav GRIZELJ, 1992	Croatia(10,11)	Exh.P00566
239.	246. Marija GRIZELJ, 13-05-1992	Croatia(10,11)	[REDACTED]
240.	247. Marija GRIZELJ, 19-07-1992	Unknown(11)	[REDACTED]
241.	248. Marija GRIZELJ, 1992	Croatia(10,11)	Exh.P00566
242.	249. Marijana GRIZELJ, 1992	Croatia(10,11)	Exh.P00566
243.	250. Milan GRIZELJ, 1992	Unknown(11)	[REDACTED]
244.	251. Milica GRIZELJ, 1992	Croatia(10,11)	Exh.P00566
245.	252. Pavica GRIZELJ, 17-08-1992	Unknown(11)	[REDACTED]
246.	253. Ratomir GRIZELJ, 19-07-1992	Unknown(11)	[REDACTED]
247.	254. Ruza GRIZELJ, 14-05-	Unknown(11)	[REDACTED]

	1992		
248.	255. Stipo GRLZELJ, 1992	Croatia(10,11)	Exh.P00569, p.4 #85
249.	256. Ana GRZEN, 1992	Croatia(10,11)	Exh.P00569, p.4 #86
250.	258. Franjo HORVAT, 1992	Unknown(11)	[REDACTED]
251.	259. Josip HUNJADI, 1992	Croatia(10,11)	Exh.P00569, p.4 #88
252.	260. Lucija HUNJADI, 1992	Croatia(10,11)	Exh.P00566
253.	261. Antun ILIC, ⁹² 1992	Croatia(10,11)	Exh.P00569, p.4 #89
254.	262. Justina ILIC, 1992	Croatia(10,11)	Exh.P00566
255.	263. Kata ILIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #90
256.	264. Milan ILIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #91
257.	265. Nikola ILIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #92
258.	266. Pavao ILIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #93
259.	267. Verica ILIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #94
260.	268. Josipa IRINI, 14-07-1992	Unknown(11)	[REDACTED]
261.	269. Stjepan IVANDIC, 20-05-1992	Croatia(10,11)	[REDACTED]
262.	270. Svetlana IVANDIC, 1992	Croatia(10,11)	Exh.P00566
263.	271. Danijel IVANIC, 1992	Croatia(10,11)	Exh.P00566
264.	272. Irena IVANIC, 1992	Croatia(10,11)	Exh.P00566
265.	274. Martin IVANIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #96
266.	275. Miroslav IVANIC, 1992	Croatia(10,11)	Exh.P00566
267.	276. Slobodan IVANIC, 1992	Croatia(10,11)	Exh.P00566
268.	277. Stipo IVANDIC, ⁹³ 1992	Croatia(10,11)	Exh.P00569, p.4 #97
269.	278. Tamara IVANIC, 1992	Croatia(10,11)	Exh.P00566
270.	279. Vera IVANIC, 1992	Croatia(10,11)	Exh.P00566
271.	280. Viktorija IVANIC, 1992	Croatia(10,11)	Exh.P00566
272.	281. Branka JASAREVIC, 1992	Croatia(10,11)	Exh.P00566
273.	282. Musa JASAREVIC , 03-08-1992	Croatia(10,11)	Exh.P00568, p.1 #37
274.	283. Anka JOVANOVIC, 01-06-1993	Croatia(10,11)	Exh.P00568, p.1 #50
275.	284. Ilojka JUHAS, 1992	Unknown(11)	[REDACTED]

⁹² [REDACTED].

⁹³ Exh.P00569 clarifies the victim's last name is IVANDIC, not IVANIC.

276.	285. Irina JUHAS, 18-07-1992	Croatia(10,11)	Exh.P00568, p.1 #49
277.	286. Josip JUHAS, 15-08-1992	Croatia(10,11)	Exh.P00568, p.1 #36
278.	287. Antonela JUKIC, 1992	Croatia(10,11)	Exh.P00566
279.	288. Ivica JUKIC, 16-06-1992	Croatia(10,11)	[REDACTED]
280.	289. Kata JUKIC, 30-06-1992	Croatia(10,11)	Exh.P00568, p.1 #11
281.	291. Lucija JUKIC, 16-06-1992	Unknown(11)	[REDACTED]
282.	292. Marija JUKIC, 30-06-1992	Croatia(10,11)	Exh.P00568, p.1 #12
283.	293. Milan JUKIC, 30-06-1992	Croatia(10,11)	Exh.P00568, p.1 #10
284.	294. Mile JUKIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #101
285.	295. Dragan JURCEVIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #103
286.	296. Franka JURCEVIC, 10-06-1992	Unknown(11)	[REDACTED]
287.	297. Ivan JURCEVIC, 10-06-1992	Unknown(11)	[REDACTED]
288.	298. Ivica JURCEVIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #102
289.	299. Luka JURCEVIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #104
290.	300. Nikola JURCEVIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #105
291.	301. Stipan JURCEVIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #106
292.	302. Zlata JURCEVIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #107
293.	303. Nada JURKOVIC, 1992	Unknown(11)	[REDACTED]
294.	304. Zrinko JURKOVIC, 19-05-1992	Unknown(11)	[REDACTED]
295.	306. Antun KALAC, 29-05-1992	Unknown(11)	[REDACTED]
296.	307. Đuro KALAC, 1992	Croatia(10,11)	Exh.P00569, p.4 #110
297.	308. Irena KALAC, 12-06-1992	Unknown(11)	[REDACTED]
298.	309. Josip KALAC, 1992	Croatia(10,11)	Exh.P00569, p.4 #109
299.	310. Lidija KALAC, 04-06-1992	Unknown(11)	[REDACTED]
300.	311. Marko KALAC, 12-06-1992	Unknown(11)	[REDACTED]
301.	312. Mirko KALAC, 1992	Canada(10,11)	Exh.P00569, p.4 #112

302.	313. Mirko KALAC, 1992	Croatia(10,11)	Exh.P00569, p.4 #111
303.	314. Perica KALAC, 1992	Croatia(10,11)	Exh.P00569, p.4 #113
304.	316. Petar KALAC, 11-06-1992	Unknown(11)	[REDACTED]
305.	317. Terezija KALAC, 26-04-1992	Unknown(11)	[REDACTED]
306.	318. Zdenka KALAC, 29-05-1992	Unknown(11)	[REDACTED]
307.	319. Zeljka KALAC, 12-06-1992	Unknown(11)	[REDACTED]
308.	320. Ana KALIC, 04-06-1992	Unknown(11)	[REDACTED]
309.	321. Ivan KALIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #115; [REDACTED]
310.	322. Marija KALIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #116
311.	323. Martin KALIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #117
312.	324. Nikola KALIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #118
313.	325. Stjepan KALIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #119
314.	326. Mijat KARLOVIC, 1992	Unknown(11)	[REDACTED]
315.	327. Zorica KARLOVIC, 1992	Unknown(11)	[REDACTED]
316.	328. Anica KATIC, 10-06-1992	Unknown(11)	[REDACTED]
317.	329. Ivan KATIC, 10-06-1992	Unknown(11)	[REDACTED]
318.	330. Nikola KATIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #120
319.	331. Aranka KAZAC, 15-05-1992	Croatia(10,11)	Exh.P00568, p.6 #90
320.	332. Mario KAZAC, 15-05-1992	Croatia(10,11)	Exh.P00568, p.6 #91
321.	333. Matija KAZAC, 15-05-1992	Croatia(10,11)	Exh.P00568, p.6 #89
322.	334. Lela KLIGER, 1992	Croatia(10,11)	Exh.P00569, p.4 #121
323.	335. Mato KOJADIN, 1992	Croatia(10,11)	Exh.P00569, p.4 #122
324.	336. Luca KOMSIC, 1992	Croatia(10,11)	Exh.P00569, p.4 #125
325.	337. Antun KONC, 1992	Croatia(10,11)	Exh.P00569, p.4 #123
326.	338. Danijela KONC, 1992	Unknown(11)	[REDACTED]
327.	339. Irena KONC, 10-06-1992	Unknown(11)	[REDACTED]
328.	340. Josip KONC, 28-05-1992	Unknown(11)	[REDACTED]
329.	341. Katica KONC, 10-06-	Unknown(11)	[REDACTED]

	1992		
330.	342. Mihajlo KONC, 1992	Unknown(11)	[REDACTED]
331.	343. Rozalija KONC, 1992	Unknown(11)	[REDACTED]
332.	344. Stjepan KONC, 1992	Croatia(10,11)	Exh.P00569, p.4 #124
333.	345. Marija KOPAS, 1992	Unknown(11)	[REDACTED]
334.	346. Josip KOVAC, ⁹⁴ 1992	Croatia(10,11)	Exh.P00569, p.5 #126
335.	347. Katica KOVAC, 24-12-1992	Croatia(10,11)	Exh.P00568, p.1 #53
336.	349. Petar KOVAC, 24-12-1992	Croatia(10,11)	Exh.P00568, p.1 #54
337.	350. Ana KOVACEVIC, 15-05-1992	Unknown(11)	[REDACTED]
338.	352. Ivan KOVACEVIC, 1992	Unknown(11)	[REDACTED]
339.	353. Janja KOVACEVIC, 1992	Unknown(11)	[REDACTED]
340.	354. Nikola KOVACEVIC, 1992	Unknown(11)	[REDACTED]
341.	355. Petar KOVACEVIC, 07-06-1992	Unknown(11)	[REDACTED]
342.	356. Stefica KOVACEVIC, 07-06-1992	Unknown(11)	[REDACTED]
343.	357. Stjepan KOVACEVIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #129
344.	358. Antun KUCINIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #130
345.	359. Marko KUCINIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #131
346.	361. Petar KUCINIC, 10-06-1992	Unknown(11)	[REDACTED]
347.	362. Karlo LAJTER, 1992	Unknown(11)	[REDACTED]
348.	363. Mihajlo LAJTER, 1992	Unknown(11)	[REDACTED]
349.	364. Antun LEDENKO, 1992	Croatia(10,11)	Exh.P00569, p.5 #133
350.	365. Nikola LOS, 1992	Croatia(10,11)	Exh.P00569, p.5 #134
351.	366. Drago LOVRIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #135
352.	367. Jelena LOVRIC, 1992	Unknown(11)	[REDACTED]
353.	368. Anica LULIC, 15-05-1992	Unknown(11)	[REDACTED]

⁹⁴ [REDACTED].

354.	369. Branimir LULIC, 15-05-1992	Unknown(11)	[REDACTED]
355.	370. Nikola LULIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #136
356.	371. Stipo LULIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #137
357.	372. Marija MAGLIC, 1992	Unknown(11)	[REDACTED]
358.	373. Pavle MAGLIC, 1992	Unknown(11)	[REDACTED]
359.	374. Zdravko MAGLIC, 1992	Unknown(11)	[REDACTED]
360.	375. Zlatko MAGLIC, 1992	Unknown(11)	[REDACTED]
361.	376. Aleksandar MAGOC, ⁹⁵ 17-03-1993	Croatia(10,11)	Exh.P00568, p.1 #57
362.	377. Aleksandra MAGOC, 17-03-1993	Croatia(10,11)	Exh.P00568, p.1 #59
363.	378. Ankica MAGOC, 1992	Croatia(10,11)	Exh.P00569, p.5 #138
364.	380. Dura MAGOC, 20-02-1993	Croatia(10,11)	Exh.P00568, p.1 #1
365.	381. Ilona MAGOC, 17-03-1992	Unknown(11)	[REDACTED]
366.	382. Ilona MAGOC, 20-02-1993	Croatia(10,11)	Exh.P00568, p.1 #2
367.	383. Nikola MAGOC, 17-03-1993	Croatia(10,11)	Exh.P00568, p.1 #58
368.	384. Alojz MANCETA, 1992	Croatia(10,11)	Exh.P00569, p.5 #141
369.	385. Antun MANCETA, 1992	Croatia(10,11)	Exh.P00569, p.5 #140
370.	386. Marija MANCETA, 15-10-1992	Croatia(10,11)	Exh.P00568, p.1 #48
371.	387. Nikola MANCETA, 20-08-1992	Croatia(10,11)	Exh.P00568, p.1 #52
372.	388. Toma MANCETA, 1992	Croatia(10,11)	Exh.P00569, p.5 #142
373.	389. Vlado MANCETA, 1992	Croatia(10,11)	Exh.P00569, p.5 #143
374.	390. Zdenko MANCETA, 1992	Croatia(10,11)	Exh.P00569, p.5 #144
375.	391. Zlatko MANCETA, 1992	Croatia(10,11)	Exh.P00569, p.5 #145
376.	392. Zlatko MANCETA, 1992	Croatia(10,11)	Exh.P00569, p.5 #146
377.	393. Kata MARAS, 1992	Croatia(10,11)	Exh.P00569, p.5 #148
378.	394. Nevenka MARAS, 1992	Croatia(10,11)	Exh.P00569, p.5 #147
379.	395. Antun MARIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #149

⁹⁵ [REDACTED].

380.	396. Ivan MARKUS, 25-02-1992	Unknown(11)	[REDACTED]
381.	397. Mato MARKUS, 1992	Croatia(10,11)	Exh.P00569, p.5 #150
382.	398. Vladimir MEDED, 1992	Unknown(11)	[REDACTED]
383.	399. Manda MEHONJA, 1992	Unknown(11)	[REDACTED]
384.	400. Kata MIHALJ, 04-06-1992	Unknown(11)	[REDACTED]
385.	402. Zoltan MIHALJ, 04-06-1992	Unknown(11)	[REDACTED]
386.	403. Franjo MOCILAC, 1992	Croatia(10,11)	Exh.P00569, p.5 #152
387.	404. Josip MOCILAC, 1992	Croatia(10,11)	Exh.P00569, p.5 #153
388.	405. Marko MOCILAC, 1992	Croatia(10,11)	Exh.P00569, p.5 #154
389.	406. Mijat MOCILAC, 1992	Unknown(11)	[REDACTED]
390.	407. Milka MOCILAC, 1992	Unknown(11)	[REDACTED]
391.	408. Pasko MOCILAC, 1992	Croatia(10,11)	Exh.P00569, p.5 #155
392.	409. Franjo MOLNAR, 1992	Unknown(11)	[REDACTED]
393.	410. Marija MOLNAR, 1992	Unknown(11)	[REDACTED]
394.	411. Jure MRKONJA, 1992	Croatia(10,11)	Exh.P00569, p.5 #156
395.	412. Milka MRKONJA, 1992	Unknown(11)	[REDACTED]
396.	413. Pavle MRKONJA, 1992	Croatia(10,11)	Exh.P00569, p.5 #157
397.	414. Pavo MRKONJA, 1992	Croatia(10,11)	Exh.P00569, p.5 #158
398.	415. Ancika MUZIK, 30-05-1992	Unknown(11)	[REDACTED]
399.	416. Stjepan MUZIK, 19-07-1992	Unknown(11)	[REDACTED]
400.	417. Manda NERALIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #159
401.	418. Branka NIKOLIC, 15-05-1992	Unknown(11)	[REDACTED]
402.	419. Franja NILIC, 27-06-1992	Croatia(10,11)	Exh.P00568, p.1 #55
403.	420. Franjo NILIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #160
404.	421. Marko NILIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #161
405.	422. Petar NILIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #162
406.	423. Anto NINIC, 10-06-1992	Unknown(11)	[REDACTED]
407.	424. Dragica NINIC, 12-05-1992	Unknown(11)	[REDACTED]
408.	425. Irena NINIC, 10-06-1992	Unknown(11)	[REDACTED]

409.	426. Ivo NINIC, 1992	Croatia(10,11)	Exh.P00569, p.5 #163
410.	427. Ivan OBAJDIN, 1992	Croatia(10,11)	Exh.P00569, p.5 #164
411.	428. Ivan OBAJDIN, 1992	Croatia(10,11)	Exh.P00569, p.5 #165
412.	429. Ivica OBAJDIN, 09-06-1992	Unknown(11)	[REDACTED]
413.	430. Ljiljana OBAJDIN, 09-06-1992	Unknown(11)	[REDACTED]
414.	431. Marija OBAJDIN, 06-06-1992	Unknown(11)	[REDACTED]
415.	432. Mile OBAJDIN, 16-06-1992	Unknown(11)	[REDACTED]
416.	433. Milka OBAJDIN, 09-06-1992	Unknown(11)	[REDACTED]
417.	434. Petar OBAJDIN, 1992	Unknown(11)	[REDACTED]
418.	435. Tomo OBAJDIN, 1992	Croatia(10,11)	Exh.P00569, p.5 #166
419.	436. Zeljko OBAJDIN, 09-06-1992	Unknown(11)	[REDACTED]
420.	437. Anica OBROVAC, 12-06-1992	Unknown(11)	[REDACTED]
421.	438. Darko OBROVAC, 1992	Unknown(11)	[REDACTED]
422.	439. Janko OBROVAC, 12-06-1992	Unknown(11)	[REDACTED]
423.	440. Kata OBROVAC, 12-06-1992	Unknown(11)	[REDACTED]
424.	441. Marko OBROVAC, 1992	Unknown(11)	[REDACTED]
425.	442. Milan OBROVAC, 1992	Unknown(11)	[REDACTED]
426.	443. Mile OBROVAC, 1992	Croatia(10,11)	Exh.P00569, p.5 #167
427.	444. Mile OBROVAC, 1992	Croatia(10,11)	Exh.P00569, p.5 #168
428.	445. Milka OBROVAC, 1992	Unknown(11)	[REDACTED]
429.	446. Nikola OBROVAC, 1992	Croatia(10,11)	Exh.P00569, p.6 #169
430.	447. Pavo OBROVAC, 1992	Croatia(10,11)	Exh.P00569, p.6 #170
431.	448. Pavo OBROVAC, 1992	Croatia(10,11)	Exh.P00569, p.6 #171
432.	449. Vesna OBROVAC, 1992	Unknown(11)	[REDACTED]
433.	450. Zlata OBROVAC, 31-05-1992	Unknown(11)	[REDACTED]
434.	451. Zoran OBROVAC, 1992	Unknown(11)	[REDACTED]
435.	452. Dragan PAKIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #172

436.	453. Josip PAKIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #173
437.	454. Pasko PAKIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #174
438.	455. Rozika PALKOVIC, 1992	Unknown(11)	[REDACTED]
439.	456. Andrija PAP, 28-04-1992	Unknown(11)	[REDACTED]
440.	457. Danko PAPUGA, 1992	Croatia(10,11)	Exh.P00569, p.6 #175
441.	459. Franjo PAULIC, 06-03-1992	Croatia(10,11)	Exh.P00568, p.6 #115
442.	460. Ivan PAULIC, 1992	Unknown(11)	[REDACTED]
443.	461. Ivica PAULIC, 11-06-1992	Croatia(10,11)	Exh.P00568, p.6 #88
444.	462. Ivica PAULIC, 19-05-1992	Unknown(11)	[REDACTED]
445.	463. Jure PAULIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #177
446.	464. Katica PAULIC, 11-06-1992	Croatia(10,11)	Exh.P00568, p.6 #85; PAULIC, T.11910-11912 ; Exh.P00631
447.	465. Marica PAULIC, 06-03-1992	Croatia(10,11)	Exh.P00568, p.6 #116
448.	467. Mile PAULIC, 11-06-1992	Croatia(10,11)	Exh.P00568, p.6 #86; T.11910-11912 ; Exh.P00631
449.	468. Zvonimir PAULIC, 11-06-1992	Croatia(10,11)	Exh.P00568, p.6 #87
450.	469. Ivan PAVISIC, 1992	Unknown(11)	[REDACTED]
451.	470. Rakela PAVISIC, 1992	Unknown(11)	[REDACTED]
452.	471. Vlatko PAVISIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #179
453.	472. Mihael PERDIC, 1992	Unknown(11)	[REDACTED]
454.	473. Nikola PERDIC, 1992	Unknown(11)	[REDACTED]
455.	475. Antun PETROVIC, 30-05-1992	Unknown(11)	[REDACTED]
456.	476. Matija PETROVIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #181
457.	477. Nikola PETROVIC, 10-06-1992	Unknown(11)	[REDACTED]
458.	478. Antun PETUNIC, 1992	Unknown(11)	[REDACTED]
459.	479. Ivan PLEIC, 23-04-1992	Unknown(11)	[REDACTED]
460.	480. Ivanka PLEIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #182
461.	481. Nikolina PLEIC, 05-06-1992	Unknown(11)	[REDACTED]
462.	482. Olivera PLEIC, 10-07-	Unknown(11)	[REDACTED]

	1992		
463.	483. Antun PLIVELIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #183
464.	484. Jasminka PORTNER, 1992	Unknown(11)	[REDACTED]
465.	485. Marija PORTNER, 1992	Unknown(11)	[REDACTED]
466.	487. Martin PORTNER, 1992	Unknown(11)	[REDACTED]
467.	488. Martin PORTNER, 1992	Unknown(11)	[REDACTED]
468.	489. Nikola PORTNER, 1992	Unknown(11)	[REDACTED]
469.	490. Petar PORTNER, 1992	Croatia(10,11)	Exh.P00569, p.6 #185
470.	491. Zlata PORTNER, 1992	Unknown(11)	[REDACTED]
471.	493. Angelina POVRZAN, 07-06-1992	Croatia(10,11)	Exh.P00568, p.1 #3
472.	494. Irena POVRZAN, 24-05-1992	Unknown(11)	[REDACTED]
473.	495. Anita POZEGA, 1992	Unknown(11)	[REDACTED]
474.	496. Antun POZEGA, 1992	Croatia(10,11)	Exh.P00569, p.6 #187
475.	497. Borka POZEGA, 1992	Unknown(11)	[REDACTED]
476.	498. Ivanka POZEGA, 30-05-1992	Unknown(11)	[REDACTED]
477.	499. Janko POZEGA, 1992	Croatia(10,11)	Exh.P00569, p.6 #188
478.	500. Josip POZEGA, 1992	Croatia(10,11)	Exh.P00569, p.6 #189
479.	501. Marija POZEGA, 1992	Unknown(11)	[REDACTED]
480.	502. Mica POZEGA, 1992	Croatia(10,11)	Exh.P00569, p.6 #190
481.	503. Milan POZEGA, 1992	Croatia(10,11)	Exh.P00569, p.6 #191
482.	504. Pavo POZEGA, 1992	Croatia(10,11)	Exh.P00569, p.6 #192
483.	505. Tomislav POZEGA, 1992	Unknown(11)	[REDACTED]
484.	506. Anika PRAVDIC, ⁹⁶ 01-01-1992	Croatia(10,11)	Exh.P00568, p.6 #82
485.	507. Ivica PRAVDIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #193
486.	508. Mirela PRAVDIC, 01-01-1992	Croatia(10,11)	Exh.P00568, p.6 #83
487.	509. Nikola PRAVDIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #194
488.	511. Pero PRAVDIC, 01-01-1992	Croatia(10,11)	Exh.P00568, p.6 #84

⁹⁶ [REDACTED].

489.	512. Josip RADOCAJ, 12-08-1992	Unknown(11)	[REDACTED]
490.	513. Mirjana RADOCAJ, 12-08-1992	Unknown(11)	[REDACTED]
491.	514. Nikola RADOCAJ, 1992	Croatia(10,11)	Exh.P00569, p.6 #196
492.	515. Aranka RASO, ⁹⁷ 01-06-1992	Croatia(10,11)	Exh.P00568, p.1 #7
493.	516. Dario RASO, 01-06-1992	Croatia(10,11)	Exh.P00568, p.1 #8
494.	517. Jasmina RASO, 01-06-1992	Croatia(10,11)	Exh.P00568, p.1 #9
495.	518. Klara RASO, 1992	Croatia(10,11)	Exh.P00569, p.6 #197
496.	519. Milka RASO, 01-06-1992	Croatia(10,11)	Exh.P00568, p.1 #5
497.	520. Mladen RASO, 01-06-1992	Croatia(10,11)	Exh.P00568, p.1 #6
498.	521. Stipo RASO, 1992	Croatia(10,11)	Exh.P00569, p.6 #198
499.	522. Stjepan RASO, 01-06-1992	Croatia(10,11)	Exh.P00568, p.1 #4
500.	523. Vinko RASO, 1992	Austria (10, 11)	Exh.P00569, p.6 #199
501.	524. Zoran RASO, 1992	Austria (10, 11)	Exh.P00569, p.6 #200
502.	525. Ivan RAUZAN, 1992	Croatia(10,11)	Exh.P00569, p.6 #201
503.	526. Marijan RAUZAN, 09-06-1992	Unknown(11)	[REDACTED]
504.	527. Nikola RAUZAN, 1992	Croatia(10,11)	Exh.P00569, p.6 #202
505.	528. Nikola RAUZAN, 1992	Croatia(10,11)	Exh.P00569, p.6 #203
506.	529. Marta RELIC, 1992	Croatia(10,11)	Exh.P00569, p.6 #204
507.	531. Zlatko RELIC, 10-05-1992	Unknown(11)	[REDACTED]
508.	532. Lucija RELJIC, 16-05-1992	Unknown(11)	[REDACTED]
509.	533. Anka RELOTA, 1992	Unknown(11)	[REDACTED]
510.	534. Ante RELOTA, 1992	Croatia(10,11)	Exh.P00569, p.6 #206
511.	535. Ante RELOTA, 1992	Croatia(10,11)	Exh.P00569, p.6 #207
512.	536. Anto RELOTA, 1992	Unknown(11)	[REDACTED]

⁹⁷ [REDACTED].

513.	537. Cvita RELOTA, 1992	Unknown(11)	[REDACTED]
514.	538. Ilojka RELOTA, 01-06-1992	Unknown(11)	[REDACTED]
515.	539. Kata RELOTA, 1992	Croatia(10,11)	Exh.P00569, p. #208
516.	540. Martin RELOTA, 02-06-1992	Unknown(11)	[REDACTED]
517.	541. Martina RELOTA, 02-06-1992	Unknown(11)	[REDACTED]
518.	543. Mirko RELOTA, 01-06-1992	Unknown(11)	[REDACTED]
519.	544. Rafael RELOTA, 1992	Croatia(10,11)	Exh.P00569, p. #210
520.	545. Rudolf RELOTA, 1992	Unknown(11)	[REDACTED]
521.	546. Sumbula RELOTA, 07-07-1992	Croatia(10,11)	Exh.P00568, p.1 #13
522.	547. Ivan RENDULIC, ⁹⁸ 1992	Croatia(10,11)	Exh.P00569, p.6 #211
523.	548. Perica RESO, 14-05-1992	Unknown(11)	[REDACTED]
524.	549. Josip REZUK, 1992	Unknown(11)	[REDACTED]
525.	550. Anita ROLAND, 12-06-1992	Unknown(11)	[REDACTED]
526.	551. Branimir ROLAND, 19-05-1992	Unknown(11)	[REDACTED]
527.	553. Petar ROLAND, 12-06-1992	Unknown(11)	[REDACTED]
528.	554. Roman ROLAND, 19-05-1992	Unknown(11)	[REDACTED]
529.	555. Stjepan ROLAND, 12-06-1992	Unknown(11)	[REDACTED]; Exh.P00557; [REDACTED]
530.	556. Branka SAMARDZIJA, 10-06-1992	Unknown(11)	[REDACTED]
531.	557. Eva SAMARDZIJA, 04-06-1992	Croatia(10,11)	Exh.P00568, p.1 #61
532.	558. Goran SAMARDZIJA, 04-06-1992	Croatia(10,11)	Exh.P00568, p.6 #62
533.	559. Jozo SAMARDZIJA, 1992	Croatia(10,11)	Exh.P00569, p.7 #216
534.	560. Marko ⁹⁹ SAMARDZIJA, 1992	Croatia(10,11)	Exh.P00569, p.7 #217

⁹⁸ [REDACTED].

535.	561. Milan SAMARDZIJA, 1992	Croatia(10,11)	Exh.P00569, p.7 #213
536.	562. Nedeljko SAMARDZIJA, 10-06-1992	Unknown(11)	[REDACTED]
537.	564. Nikola SAMARDZIJA (son of Ante), 04-06-1992	Croatia(10,11)	Exh.P00568, p.1 #60
538.	565. Nikola SAMARDZIJA (son of Jure), 1992	Unknown(11)	[REDACTED]
539.	566. Predrag SAMARDZIJA, 10-06-1992	Unknown(11)	[REDACTED]
540.	567. Renata SAMARDZIJA, 10-06-1992	Unknown(11)	[REDACTED]
541.	568. Ruzica SAMARDZIJA, 05-06-1992	Unknown(11)	[REDACTED]
542.	569. Zvonko SAMARDZIJA, 1992	Croatia(10,11)	Exh.P00569, p.7 #215
543.	570. Ivan SAMO, 28.01-1992	Croatia(10,11)	Exh.P00568, p.6 #113
544.	571. Ivan SAMU, 1992	Croatia(10,11)	Exh.P00569, p.7 #231
545.	573. Karlo SAMU, 28-05-1992	Croatia(10,11)	Exh.P00568, p.6 #112
546.	575. Mata SAMU, 27-05-1992	Croatia(10,11)	Exh.P00568, p.6 #114
547.	576. Josip SANTA, 1992	Unknown(11)	[REDACTED]
548.	577. Kata SANTA, 1992	Unknown(11)	[REDACTED]
549.	578. Lucija SANTA, 1992	Croatia(10,11)	Exh.P00569, p.7 #233
550.	579. Ilonka SARA, 09-09-1992	Croatia(10,11)	Exh.P00568, p.6 #81
551.	580. Franjo SARKANJ, 1992	Croatia(10,11)	Exh.P00569, p.7 #234
552.	581. Stjepan SARKANJ, 1992	Unknown(11)	[REDACTED]
553.	582. Teruska SARKANJ, 31-05-1992	Unknown(11)	[REDACTED]
554.	584. Ivan SEBALJ, 28-06-1992	Croatia(10,11)	Exh.P00568, p.6 #94
555.	585. Ivana SEBALJ, 28-06-1992	Croatia(10,11)	Exh.P00568, p.6 #93
556.	586. Jelena SEBALJ, 28-06-1992	Croatia(10,11)	Exh.P00568, p.6 #92

⁹⁹ Exh.P00569 clarifies that the victim's first name is Marko, not Marka.

557.	587. Mile SEBALJ, 1992	Croatia(10,11)	Exh.P00569, p.7 #236
558.	588. Manda SLJERAC, 1992	Yugoslavia (11)	Exh.P00569, p.7 #237
559.	589. Danijel SMOLCIC, 12-02-1993	Croatia(10,11)	Exh.P00568, p.1 #27
560.	590. Ilusica SMOLCIC, 12-02-1993	Croatia(10,11)	Exh.P00568, p.1 #26
561.	592. Marko SMOLCIC, 12-02-1993	Croatia(10,11)	Exh.P00568, p.1 #25
562.	593. Irenka SORADI, 01-06-1993	Croatia(10,11)	Exh.P00568, p.1 #51
563.	595. Josip SORADI, 19-06-1992	Unknown(11)	[REDACTED]
564.	596. Lucija SORADI, 19-06-1992	Unknown(11)	[REDACTED]
565.	597. Kata SOSTARIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #238
566.	598. Damir SPRENGER, 31-05-1992	Unknown(11)	[REDACTED]
567.	599. Zvonko SPRENGER, 1992	Croatia(10,11)	Exh.P00569, p.7 #239
568.	600. Nikola STANISIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #226
569.	601. Blaz STEFANAC, 28-05-1992	Unknown(11)	[REDACTED]
570.	602. Boris STEFANAC, 25-05-1992	Croatia(10,11)	Exh.P00568, p.1 #20
571.	603. Branka STEFANAC, 25-05-1992	Croatia(10,11)	Exh.P00568, p.1 #16
572.	604. Marija STEFANAC, 08-05-1992	Unknown(11)	[REDACTED]
573.	606. Mile STEFANAC, 25-05-1992	Croatia(10,11)	Exh.P00568, p.1 #17
574.	607. Nikola STEFANAC, 1992	Croatia(10,11)	Exh.P00569, p.7
575.	609. Nikola STEFANAC, 25-05-1992	Croatia(10,11)	Exh.P00568, p.1 #19
576.	610. Rozalija STEFANAC, 16-05-1992	Unknown(11)	[REDACTED]
577.	611. Tomo STEFANAC, 1992	Croatia(10,11)	Exh.P00569, p.7
578.	613. Tomo STEFANAC, 16-05-1992	Unknown(11)	[REDACTED]

579.	614. Zlatko STEFANAC, 25-05-1992	Croatia(10,11)	Exh.P00568, p.1 #18
580.	615. Antun STIPETIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #220
581.	616. Biljana STIPETIC, 27-11-1992	Croatia(10,11)	Exh.P00568, p.1 #43
582.	617. Dura STIPETIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #221
583.	618. Josip STIPETIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #222
584.	619. Jure STIPETIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #223
585.	620. Marijana STIPETIC, 15-01-1992	Unknown(11)	[REDACTED]
586.	621. Marko STIPETIC, 01-06-1992	Unknown(11)	[REDACTED]
587.	622. Mica STIPETIC, 1992	Croatia(10,11)	Exh.P00569, p. #224
588.	623. Mile STIPETIC, 27-11-1992	Croatia(10,11)	Exh.P00568, p.1 #38
589.	624. Miroslav STIPETIC, 27-11-1992	Croatia(10,11)	Exh.P00568, p.1 #42
590.	626. Petar STIPETIC, 27-11-1992	Croatia(10,11)	Exh.P00568, p.1 #40
591.	627. Teruska STIPETIC, 27-11-1992	Croatia(10,11)	Exh.P00568, p.1 #41
592.	628. Tomislav STIPETIC, 27-11-1992	Croatia(10,11)	Exh.P00568, p.1 #44
593.	629. Vera STIPETIC, 27-11-1992	Croatia(10,11)	Exh.P00568, p.1 #39
594.	631. Zeljko STIPETIC, 15-05-1992	Unknown(11)	[REDACTED]
595.	632. Nikola SUBASIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #228
596.	633. Nikola SUBASIC 1992	Croatia(10,11)	Exh.P00569, p.7 #229
597.	634. Irena SULOCKI, 10-06-1992	Unknown(11)	[REDACTED]
598.	635. Franjo SURJAN, 1992	Croatia(10,11)	Exh.P00569, p.7 #245
599.	636. Matilda SURJAN, 1992	Unknown(11)	[REDACTED]
600.	637. Josip TACKOVIC, 1992	Croatia(10,11)	Exh.P00569, p.7 #246
601.	638. Nikola TACKOVIC, 11-04-1992	Unknown(11)	[REDACTED]
602.	639. Bara TAMAS, 1992	Croatia(10,11)	Exh.P00569, p.7 #247
603.	640. Ilonka TAMAS, 15-05-1992	Unknown(11)	[REDACTED]

604.	641. Ivan TAMAS, 1992	Croatia(10,11)	Exh.P00569, p.7 #248
605.	642. Simun TAMAS, 06-06-1992	Unknown(11)	[REDACTED]
606.	643. Antun TKALAC, 1992	Croatia(10,11)	Exh.P00569, p.7 #249
607.	644. Ivan TKALAC, 1992	Croatia(10,11)	Exh.P00569, p.7 #250
608.	645. Josip TKALAC, 1992	Croatia(10,11)	Exh.P00569, p.7 #251
609.	646. Lucija TKALAC, 1992	Croatia(10,11)	Exh.P00569, p.7 #253
610.	647. Martin TKALAC, 1992	Croatia(10,11)	Exh.P00569, p.7 #252
611.	648. Mihalj TOLDI, 1992	Unknown(11)	[REDACTED]
612.	649. Mihalj TOLDI, 1992	Unknown(11)	[REDACTED]
613.	650. Mira TOLDI, 1992	Unknown(11)	[REDACTED]
614.	651. Anica TOMAS, 24-12-1992	Croatia(10,11)	Exh.P00568, p.6 #78
615.	652. Anka TOMAS, 22-06-1992	Croatia(10,11)	Exh.P00568, p.6 #80
616.	653. Niko TOMAS, 1992	Croatia(10,11)	Exh.P00569, p.7 #254
617.	655. Petar TOMAS, 22-01-1992	Croatia(10,11)	Exh.P00568, p.6 #76
618.	656. Simun TOMAS, 22-06-1992	Croatia(10,11)	Exh.P00568, p.6 #79
619.	657. Toni TOMAS, 24-12-1992	Croatia(10,11)	Exh.P00568, p.6 #77
620.	658. Vera TOMAS, 22-01-1992	Croatia(10,11)	Exh.P00568, p.6 #75
621.	659. Stjepan TORMA, 1992	Croatia(10,11)	Exh.P00569, p.8 #256
622.	660. Ivica TRIFUNOVIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #257
623.	661. Anita TURKALJ, 15-02-1992	Croatia(10,11)	Exh.P00568, p.6 #69
624.	663. Franjo TURKALJ, 15-02-1992	Croatia(10,11)	Exh.P00568, p.6 #67
625.	664. Ivan TURKALJ, 1992	Croatia(10,11)	Exh.P00569, p.8 #259
626.	665. Katica TURKALJ, 15-02-1992	Croatia(10,11)	Exh.P00568, p.6 #68
627.	666. Marica TURKALJ, 09-07-1992	Unknown(11)	[REDACTED]
628.	667. Marija TURKALJ, 04-06-1992	Croatia(10,11)	Exh.P00568, p.6 #63
629.	669. Mirko TURKALJ, 04-	Croatia(10,11)	Exh.P00568, p.6 #64

	06-1992		
630.	670. Nikola TURKALJ, 09-07-1992	Unknown(11)	[REDACTED]
631.	671. Nikolina TURKALJ, 04-06-1992	Croatia(10,11)	Exh.P00568, p.6 #66
632.	672. Snezana TURKALJ, 04-06-1992	Croatia(10,11)	Exh.P00568, p.6 #65
633.	673. Tomo TURKALJ, 1992	Croatia(10,11)	Exh.P00569, p.8 #261
634.	674. Zeljko TURKALJ, 15-02-1992	Croatia(10,11)	Exh.P00568, p.6 #70
635.	675. Snezana VARGA, 10-06-1992	Unknown(11)	[REDACTED]
636.	676. Svjetlana VARGA, 10-06-1992	Unknown(11)	[REDACTED]
637.	677. Tibor VARGA, 10-06-1992	Unknown(11)	[REDACTED]
638.	678. Ana VARJU, 20-10-1992	Croatia(10,11)	Exh.P00568, p.1 #30
639.	679. Antun VARJU, 20-10-1992	Croatia(10,11)	Exh.P00568, p.1 #31
640.	680. Damir VARJU, 20-10-1992	Croatia(10,11)	Exh.P00568, p.1 #34
641.	681. Davor VARJU, 20-10-1992	Croatia(10,11)	Exh.P00568, p.1 #33
642.	682. Mata VARJU, 20-10-1992	Croatia(10,11)	Exh.P00568, p.1 #29
643.	683. Mato VARJU, 1992	Croatia(10,11)	Exh.P00569, p.8 #262
644.	684. Milica VARJU, 20-10-1992	Croatia(10,11)	Exh.P00568, p.1 #32
645.	685. Petar VARJU, 1992	Croatia(10,11)	Exh.P00569, p.8 #263
646.	686. Roza VARJU, 20-10-1992	Croatia(10,11)	Exh.P00568, p.1 #35
647.	687. Ivan VARNJU, 30-05-1992	Unknown(11)	[REDACTED]
648.	688. Josip VEICAS, 1992	Unknown(11)	[REDACTED]
649.	689. Katica VEKAS, 1992	Unknown(11)	[REDACTED]
650.	690. Marija VEKAS, 1992	Unknown(11)	[REDACTED]
651.	691. Ruzica VELES, 29-05-1992	Unknown(11)	[REDACTED]
652.	692. Antun VICIK, 1992	Croatia(10,11)	Exh.P00569, p.8 #264

653.	693. Branislav VIDA, 03-06-1992	Unknown(11)	[REDACTED]
654.	694. Stevo VIDA, 1992	Croatia(10,11)	Exh.P00569, p.8 #265
655.	695. Lucija VOLAR, 04-06-1992	Unknown(11)	[REDACTED]
656.	696. Stjepan VOLAR, 04-06-1992	Unknown(11)	[REDACTED]
657.	698. Antun VOLARIC, 13-06-1992	Croatia(10,11)	Exh.P00568, p.6 #72
658.	699. Biljana VOLARIC, 13-06-1992	Croatia(10,11)	Exh.P00568, p.6 #74
659.	701. Ivan VOLARIC, 25-12-1992	Croatia(10,11)	Exh.P00568, p.6 #108
660.	702. Ivanka VOLARIC, 25-08-1992	Croatia(10,11)	Exh.P00568, p.6 #107
661.	703. Ivo VOLARIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #266
662.	704. Janja VOLARIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #269
663.	705. Josip VOLARIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #270
664.	706. Marija VOLARIC, 1992	Unknown(11)	[REDACTED]
665.	707. Marija VOLARIC, 25-12-1992	Croatia(10,11)	Exh.P00568, p.6 #109
666.	708. Marija VOLARIC, 13-06-1992	Croatia(10,11)	Exh.P00568, p.6 #71
667.	709. Marko VOLARIC, 13-06-1992	Croatia(10,11)	Exh.P00568, p.6 #73
668.	710. Mijat VOLF, 1992	Croatia(10,11)	Exh.P00569, p.8 #271
669.	711. Andrija VRANKOVIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #272
670.	712. Martin VRANKOVIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #273
671.	713. Pavle VRANKOVIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #274
672.	714. Branimir / "Branko" ¹⁰⁰ VUKSANIC, 29-06-1992	Croatia(10,11)	Exh.P00569, p.8 #275; [REDACTED]
673.	715. Nikola ¹⁰¹ VUKSANIC, 29-06-1992	Croatia(10,11)	Exh.P00569, p.8 #276
674.	716. Andro ZEMBERI, 1992	Croatia(10,11)	Exh.P00569, p.8 #278

¹⁰⁰ Ejić, T.10407; Exh.P00558, p.28.

¹⁰¹ Ejić, T.10407; Exh.P00558, p.28; [REDACTED].

675.	717. Antun ZEMBERI, 05-11-1992	Croatia(10,11)	Exh.P00568, p.1 #47
676.	718. Barbara ZEMBERI, 05-11-1992	Croatia(10,11)	Exh.P00568, p.1 #46
677.	719. Ivan ZEMBERI, 1992	Croatia(10,11)	Exh.P00569, p.8 #279
678.	721. Pavle ZEMBERI, 05-11-1992	Croatia(10,11)	Exh.P00568, p.1 #45
679.	722. Ivan ZUKANOVIC, 1992	Croatia(10,11)	Exh.P00569, p.8 #277

ANNEX E

WANTON DESTRUCTION COUNT 12

1. Vukovar

From August 1991 to May 1992 wanton destruction took place.¹

#	Incident	Perpetrator(s)
1.	Vukovar totally destroyed with extensive damage to civilian property; ² Severe damage to Vukovar hospital, schools, public buildings, offices, wells, the water and roads; ³ Random, frequent shelling of kindergartens, graveyards, markets, school buildings, old people's homes, and industrial facilities; ⁴ Indiscriminate shelling of non military targets ⁵	Serb Forces, JNA ⁶
2.	Croatian houses shelled ⁷	JNA ⁸
3.	Shelling of square next to school and containing Cross of Bečar ⁹ and of Eltz Castle ¹⁰	Serb forces ¹¹
4.	Destruction of villages of Luzac, Opatovac, Stompajvci, Tolonik, Trpinja, Bršadin, Petrovci, Negoslavci and Borovo Naselje ¹²	Serb forces ¹³
5.	Destruction and serious damage to homes in Mitnica so that no house was left standing ¹⁴ By the beginning of November 1991 virtually none of the houses along the road from Vukovar to Mitnica were left standing above the cellar. ¹⁵	JNA, Serb forces ¹⁶
6.	Attacks on Croatian-populated villages which posed no military threat. Houses and	JNA, State Security Service, police, volunteers ¹⁸

¹ Indictment, para. 34(a); PTB, para.60

² AFII-111,113,114, 202; Exh.P01291, p.4; Exh.P00603, para.11; [REDACTED]

³ AFII-203.

⁴ [REDACTED]

⁵ [REDACTED]

⁶ AFII-102; VS-021, [REDACTED]; Exh.P00603, paras.9-10 (public); Exh.P00278, para.7 (public); VS-002, T.6461. *See also* [REDACTED]

⁷ Exh.P00278, paras.7-9,13 (public).

⁸ Exh.P00278, para.7 (public). *See also* [REDACTED]; AFII- 44.

⁹ [REDACTED].

¹⁰ AFII-208.

¹¹ AFII-102; [REDACTED].

¹² AFII-111.

¹³ AFII-102; [REDACTED].

¹⁴ AFII-102-114.

¹⁵ AFII-200.

¹⁶ AFII-102; [REDACTED].

	buildings would be destroyed and there was looting and torching of property ¹⁷	
7.	Čelije destroyed ¹⁹	Serb Forces ²⁰
8.	Vukovar hospital was shelled ²¹ , and later continued to be shelled despite two large and highly visible Red Cross signs on white canvass identifying the building as a hospital. ²² “Shelling, bombing and other destruction” of the hospital caused the upper floors to be evacuated and patients to cluster in the “desperately crowded basement areas” ²³	Serb forces ²⁴ , JNA ²⁵
9.	Air assault on Vukovar causing extensive damage ²⁶	JNA ²⁷
10.	Shelling of villages in Eastern Baranja causing extensive damage ²⁸	Serb forces ²⁹
11.	Shelling of Osijek, Erdut, Dalj, Borovo Naselje, Ilok ³⁰	Serb forces ³¹

3. Greater Sarajevo

(a) Ilijaš

From March 1992 to at least September 1993 wanton destruction took place.³²

#	Incident	Perpetrator(s)
1.	Wanton destruction through burning of houses and other private property during the attack and shelling of Lješevo ³³	Serb TO, Šešeljević including Vasilije VIDOVIĆ aka Vaske and his men ³⁴

¹⁷ Exh P01137, pp. 92-94 (public).

¹⁸ Exh.P01137, p.93 (public).

¹⁹ Exh.P00632, p.35 (public).

²⁰ AFII-102; [REDACTED]

²¹ Exh.P00603, paras.17-21, 23, 42 (public); [REDACTED]

²² Exh.P00603, paras.17-21(public).

²³ AFII-119, 219; Exh.P00603, para.23 (public).

²⁴ AFII-119.

²⁵ Exh.P00603, paras.18, 20-21 (public).

²⁶ AFII-60, 61; [REDACTED].

²⁷ AFII-60.

²⁸ AFII-55.

²⁹ AFII-102; [REDACTED]; Exh.P00603, paras.9-10(public); Exh.P00278, para.7(public); VS-002, T.6461 (open). *See also* [REDACTED].

³⁰ AFII-45-54, 56; Exh.P00632, p.35 (public); Exh.P00603, para.16 (public).

³¹ AFII-102; [REDACTED]; Exh.P00603, paras.9-10 (public); Exh.P00278, para.7(public); VS-002, T.6461 (open). *See also* [REDACTED]

³² Indictment, para.34; Pre-trial Brief, para.98.

³³ [REDACTED]; VS-1055, T.7819, 7833 (open).

(b) Vogošća

From March 1992 to at least September 1993 wanton destruction took place.³⁵

#	Incident	Perpetrator(s)
1.	Wanton destruction during attack and shelling of Svrake ³⁶	Serb forces including soldiers in JNA uniforms, Rajko JANKOVIĆ's unit in black camouflage uniforms, ³⁷ Serb TO ³⁸

4. Mostar

From March 1992 to at least September 1993 wanton destruction took place.³⁹

#	Incident	Perpetrator(s)
1.	Destruction of homes in Mostar, indiscriminate shelling, destruction of houses in Topla village and shelling of Croat suburbs	JNA ⁴⁰ , Serb forces ⁴¹ , Šešeljevi including VRANJANAC, Mico DRAŽIĆ, and "SRECKO" ⁴² , General PERISIĆ ⁴³ , Šešeljevi under Vojvoda Oliver BARET ⁴⁴

5. Nevesinje

From March 1992 to at least September 1993 wanton destruction took place.⁴⁵

#	Incident	Perpetrator(s)
1.	Widespread destruction of villages. Pattern of shelling, burning houses, killing and	Serb forces ⁴⁷ including soldiers in camouflage uniforms led by

³⁴ VS-1055, T.7820-7821, 7833 (open); [REDACTED].

³⁵ Indictment, para.34; Pre-trial Brief, para.102.

³⁶ Exh.P01346, p.11 (public); Sejdić, T.8165, 8181, 8237 (open); Riedlmayer, T.7341-7342 (open).

³⁷ Sejdić, T.8183-8186 (open).

³⁸ Sejdić, T.8190 (open).

³⁹ Indictment, para.34(B); Pre-Trial Brief, para.112.

⁴⁰ [REDACTED]; Tot, Exh.P00846, p.1 (public).

⁴¹ [REDACTED]; VS-1067, T.15314 (open).

⁴² [REDACTED]; VS-1067, T.15316-15317 (open).

⁴³ Tot, Exh.P00843, paras. 49-51(public); VS-1067, [REDACTED]

⁴⁴ Tot, Exh.P00843, paras. 54-55(public).

⁴⁵ Indictment, para. 34(B); Pre-Trial Brief, para.119.

	expelling people, looting, and then burning down the village ⁴⁶	Krsto SAVIĆ ⁴⁸ , Šešeljević, local police, members of the Karadorde unit, “Chetniks from Serbia and Montenegro,” and Arkan’s men ⁴⁹
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⁴⁶ Kujan, Exh.P00524, p.6 (public); Kujan, T.9656 (open).

⁴⁷ [REDACTED]. See AFIV-181 (shelling and burning of Presjeka).

⁴⁸ AFIV-180. See [REDACTED].

⁴⁹ Kujan, Exh.P00524, p.6 (public).

**DESTRUCTION OR WILFUL DAMAGE TO RELIGIOUS OR
EDUCATIONAL INSTITUTIONS – COUNT 13**

2. Zvornik

From March 1992 to at least September 1993 religious or educational institutions were destroyed or damaged.⁵⁰

#	Incident	Perpetrator(s)
1.	Large scale destruction of mosques, other Muslim places of worship, and religious institutions after the take over of Zvornik ⁵¹	VRS, Serb TO, Serb Municipal Authorities ⁵²

3. Greater Sarajevo

(a) Ilijaš

From March 1992 to at least September 1993 religious or educational institutions were destroyed or damaged.⁵³

#	Incident	Perpetrator(s)
1.	Destruction of mosques, churches and other religious sites in Ilijaš Municipality ⁵⁴	Serb forces including Serb TO and Šešeljević led by Vasilije VIDOVIĆ aka VASKE ⁵⁵

(b) Vogošća

From March 1992 to at least September 1993 the following religious or educational institutions were destroyed or damaged.⁵⁶

#	Incident	Perpetrator(s)
1.	Destruction of mosques and churches in Vogošća Municipality ⁵⁷	Serb forces including Šešeljević Vasilije VIDOVIĆ aka Vaske ⁵⁸

⁵⁰ Indictment, para.34; Pre-trial Brief, para.93.

⁵¹ Riedlmayer, Exhs.P01044, paras.26, 29-35, 36, 38-39, 49-50 (public); P01045, pp.177-313 (public); [REDACTED]; VS-037, T.15018 (open); [REDACTED].

⁵² [REDACTED]; Riedlmayer, Exh.P01044, paras.32-34 (public).

⁵³ Indictment, para.34; Pre-trial Brief, para.100.

⁵⁴ VS-1055, T.7843-7844, 7935 (open); Džafić, Exh.P00840, para.24(public); Exh.P01045, pp.333-386(public).

⁵⁵ VS-1055, T.7843-7844, 7935 (open); Džafić, Exh.P00840, paras.22, 24(public); [REDACTED]; Exh.P01045, pp.333-342 (public).

⁵⁶ Indictment, para.34; Pre-trial Brief, para.102.

4. Mostar

From March 1992 to at least September 1993 the following religious or educational institutions were destroyed or damaged.⁵⁹

#	Incident	Perpetrators
1.	Large scale destruction of mosques and Catholic churches in and around Mostar ⁶⁰	Šešeljevac Srdan ĐURIĆ ⁶¹ Serb forces ⁶²

5. Nevesinje

From March 1992 to at least September 1993 the following religious or educational institutions were destroyed or damaged.⁶³

#	Incident	Perpetrator
1.	Destruction of all the mosques ⁶⁴ and Catholic churches ⁶⁵ in Nevesinje	Serb forces ⁶⁶ including Šešeljevci led by VRANJANAC, ⁶⁷ [REDACTED], ⁶⁸ Serb extremists, ⁶⁹ JNA troops ⁷⁰ and reservists, ⁷¹ Serb military and civilians ⁷²

⁵⁷ Sejdić, T.8282; 8343-8344 (open); Exh.P01045, pp.321-332 (public). Riedlmayer, T. 7341-7342 (open).

⁵⁸ Sejdić, T.8282; 8343-8344 (open); Exh.P01045, pp.321-323 (public).

⁵⁹ Indictment, para.34(B); Pre-Trial Brief, para.112.

⁶⁰ Riedlmayer, Exhs.P01044 (public), P01045 (public); Tot, Exhs.P00843, para.44 (public); P00846, p.2(public).

⁶¹ Tot, Exh.P00843, para.44 (public); Tot, Exh.P00846, p.2 (public).

⁶² Riedlmayer, Exh.P01044, p.20(public); Riedlmayer, Exh.P01045, pp.444-445 (public) (destroyed the Mosque of Sevril Hadzi Hasanova), 447-448 (public) (destroyed the Mosque of Dervish-pasha Bajezidagic), 450-451 (public) (destroyed the Mosque of Cose Jahja-hodzina dzamija), 453-454 (public) (damaged the Mosque of Hadzi Kurtova dzamija), p.459 (Prostor former Islamic courts building and library); 468-469 (public) (shelled and burned Catholic parish Church of the Most Sacred Heart of Jesus), 471 (public) (attacked and burned the Convent of the Franciscan Sisters at Potoci), 474-475 (public) (severely damaged the Catholic Church of St. Matthew the Evangelist at Orlac).

⁶³ Indictment, para. 34(B); Pre-Trial Brief, para.119.

⁶⁴ Kujan, T.9647-9648 (open); Kujan, Exh.P00524, p.2 (public); [REDACTED].

⁶⁵ Kujan, T.9647-9648 (open); Kujan, Exh.P00524, p.2 (public).

⁶⁶ Riedlmayer, Exh.P01045, pp.141-142 (public) (destruction of minaret and roof and mining of Zulja mosque), 168-169 (minaret and roof of Kljuna mosque destroyed), 174-175 (public) (Old mosque at Donja Bijenja), 138-139 (public) (destruction of roof and burning out of Prijecka Strana mosque in Nevesinje).

⁶⁷ VS-1067, T.15337 (open); Riedlmayer, Exh.P01045, p.157 (public). See Kujan, Exh.P00524, p.2(public); Riedlmayer, T.7305 (open)(destruction of Roman Catholic Church of the Assumption of the Blessed Virgin Mary).

⁶⁸ [REDACTED].

PLUNDER – COUNT 14

1. Vukovar

From August 1991 until May 1992 public or private property was plundered.⁷³

#	Incident	Perpetrator(s)
1.	“Wholesale looting” ⁷⁴	“Volunteers, natives, those who were there and those who had come from elsewhere” ⁷⁵
3.	“Wholesale looting” ⁷⁶	Serb Forces ⁷⁷
4.	Theft of jewellery and appliances, some of them from Serb houses ⁷⁸	Guards Brigade members in at least one case ⁷⁹
6.	Looting ⁸⁰	“Chetniks” ⁸¹

2. Zvornik

From March 1992 to at least September 1993 public or private property was plundered.⁸²

#	Incident	Perpetrator(s)
1.	Looting of non-Serb property in and around Zvornik ⁸³	Serb forces including Serb TO, Arkan’s men; Šešeljevi including Pivarski’s men, Yellow Wasps, ⁸⁴ Vojvoda Čele ⁸⁵

⁶⁹ Riedlmayer, Exh.P01045, pp.144-145 (public) (razing of Mosque of Hadzi Veljudian Aqa Bakrac), 159-160 (vandalism and desecration of Mosque of Sinan Dedi Efendi).

⁷⁰ Riedlmayer, Exh.P01045, pp.162-163 (public) (destruction of minaret, roof, interior, and three walls of Ljubovic Mosque).

⁷¹ Riedlmayer, Exh.P01045, pp.147-148 (public) (destruction of Emperor’s Mosque).

⁷² Riedlmayer, Exh.P01045, pp.165-166 (public) (severe damage to old mosque at Krusevljani; destruction of minaret, roof, and façade).

⁷³ Indictment, para.34(a); Pre-Trial Brief, para.60.

⁷⁴ [REDACTED]

⁷⁵ [REDACTED].

⁷⁶ [REDACTED].

⁷⁷ [REDACTED]

⁷⁸ [REDACTED]

⁷⁹ [REDACTED].

⁸⁰ [REDACTED]

⁸¹ [REDACTED]

⁸² Indictment, para.34; Pre-Trial Brief, para.94.

⁸³ Banjanović, T.12441-12442 (open); VS-036, [REDACTED]; Exh.P00977; [REDACTED]

⁸⁴ Banjanović, T.12441-12442 (public); [REDACTED]; Alić, T.7048 (open); Exh.P00977(public); [REDACTED].

⁸⁵ [REDACTED].

2.	Inmates from Ciglana Factory were forced to loot and load goods on trucks directed to Loznica in Serbia. ⁸⁶	Šešeljevi from Kraljevo and from Loznica ⁸⁷
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3. Greater Sarajevo

(a) Ilijaš

From March 1992 to at least September 1993 public or private property was plundered.⁸⁸

#	Incident	Perpetrator(s)
1.	Non-Serbs of Lješevo were robbed and their property was looted during the attack ⁸⁹	Serb TO, Šešeljevi including Vasilije VIDOVIĆ aka Vaske and his men ⁹⁰

(b) Vogošća

From March 1992 to at least September 1993 public or private property was plundered.⁹¹

#	Incident	Perpetrator(s)
1.	Non-Serb property was extensively looted and re-allocated to Serbs after Serb forces took over Svrake ⁹²	Serb forces including Serb TO/VRS and local Serbs ⁹³

(c) Novo Sarajevo

From March 1992 to at least September 1993 public or private property was plundered.⁹⁴

⁸⁶ VS-1013, T.5216-5217, 5243-5245, 5258-5260, 5373-5374, 5380-5382 (open); [REDACTED]; VS-1015, T.5429 (open); Kopic, Exh.P00362, pp.7-8 (public); Exh.P00971, pp.3-4, 7(public).

⁸⁷ VS-1015, T.5405, 5429 (open); VS-1013, T.5216-5217, 5243-5244, 5247-5248, 5380-5382 (open); Exh.P00971, pp.3-4, 7 (public).

⁸⁸ Indictment, para.34; Pre-trial Brief, para.98.

⁸⁹ [REDACTED]; VS-1055, T.7820-7821 (open); Džafić, Exh.P00840, paras.26, 31 (open).

⁹⁰ VS-1055, T.7820-7821, 7833-7834 (open); [REDACTED].

⁹¹ Indictment, para.34; Pre-Trial Brief, para.102.

⁹² Sejdić, T.8188-8196 (open); Exh.P00463 (public).

⁹³ Sejdić, T.8190 (open); Exh.P00463(public).

⁹⁴ Pre-Trial Brief, para.105.

#	Incident	Perpetrator(s)
1.	Extensive looting of non-Serb property in Grbavica. Goods were removed and loaded on trucks with Serbian registration plates with the support of municipal authorities. ⁹⁵	Serb forces including JNA/VRS, Šešeljevi led by Slavko ALEKSIĆ, Serb TO, Serb municipal authorities ⁹⁶

4. Mostar

From March 1992 to at least September 1993 public or private property was plundered.⁹⁷

#	Incident	Perpetrator(s)
1.	Widespread looting in Mostar and Topla ⁹⁸	Šešeljevi including VRANJANAC, Mico DRAŽIĆ, and “SRECKO” ⁹⁹ Šešeljevi and “troops, reservists and paramilitaries” ¹⁰⁰ Saša ZUROVAC, Goran GRAHOVAC, members of “Chetnik formations” ¹⁰¹

5. Nevesinje

From March 1992 to at least September 1993 public or private property was plundered.¹⁰²

#	Incident	Perpetrator
1.	Widespread looting ¹⁰³	[REDACTED], ¹⁰⁴ [REDACTED] ¹⁰⁵

⁹⁵ VS-1060, T.8575-8579, 8582, 8599-8600, 8602-8606, 8609-8610, 8620, 8627-8628 (open).

⁹⁶ VS-1060, T. 8573-8581, 8591, 8603 (open).

⁹⁷ Indictment, para.34(B); Pre-Trial Brief, para.113.

⁹⁸ VS-1067, T.15316-15317 (open); [REDACTED]

⁹⁹ [REDACTED]; VS-1067, T.15317 (open).

¹⁰⁰ [REDACTED]VS-1067, T.15316-15317 (open); [REDACTED].

¹⁰¹ [REDACTED].

¹⁰² Indictment, para.34(B); Pre-Trial Brief, para.119.

¹⁰³ [REDACTED]; Kujan, Exh.P00524, p.6 (public).

¹⁰⁴ [REDACTED].

¹⁰⁵ [REDACTED]