

D 7673 - D 7621  
15 July 2005

70B.

**THE INTERNATIONAL CRIMINAL TRIBUNAL  
FOR THE FORMER YUGOSLAVIA**

**Case No. IT-03-67**

**THE PROSECUTOR  
OF THE TRIBUNAL**

**AGAINST**

**VOJISLAV ŠEŠELJ**

**MODIFIED AMENDED INDICTMENT**

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

**VOJISLAV ŠEŠELJ**

with **CRIMES AGAINST HUMANITY** and **VIOLATIONS OF THE LAWS OR CUSTOMS OF WAR** as set forth below:

**THE ACCUSED**

1. **Vojislav ŠEŠELJ**, son of Nikola ŠEŠELJ, was born on 11 October 1954 in Sarajevo, Republic of Bosnia and Herzegovina ("Bosnia and Herzegovina"). He is a graduate of the faculty of law of Sarajevo University. He holds a Bachelor's Degree, a Masters Degree and a Doctorate obtained in 1976, 1978 and 1979 respectively. From 1981 to 1984 he worked as an assistant professor lecturing on political science at Sarajevo University.

2. Although he was originally a communist, **Vojislav ŠEŠELJ** eventually became critical of the communist regime in the former Yugoslavia and in the early 1980s he developed close relations with a group of Serbian nationalists. In 1984 he was convicted of "counter-revolutionary activities" and sentenced to eight years of imprisonment. Upon the commutation of the sentence by the Supreme Court of the Socialist Federal Republic of Yugoslavia ("SFRY") he was released in 1986.

3. After his release **Vojislav ŠEŠELJ** settled down in Belgrade and continued to engage in nationalistic politics. In 1989 he travelled to the USA and met the chairman of the "Movement of Chetniks in the Free World", Momčilo Đujić, who on the day of the 600<sup>th</sup> anniversary of the Battle of Kosovo - 28 June 1989 - appointed him a Chetnik "Vojvoda", meaning a "Duke" or leader. Following this appointment **Vojislav ŠEŠELJ** travelled in the USA, Canada, Australia and Western Europe.

collecting funds to support his nationalistic activities. On 23 January 1990, **Vojislav ŠEŠELJ** became the leader of the Serbian Freedom Movement and on 14 March 1990, formed an alliance with Vuk Drašković, another Serbian nationalist, and started the "Serbian Renewal Movement" ("SPO").

4. In June 1990 **Vojislav ŠEŠELJ** founded the "Serbian National Renewal Party", subsequently renamed the "Serbian Chetnik Movement". In the elections of December 1990 his party received almost 100,000 votes. Shortly thereafter, the authorities of the SFRY banned the "Serbian Chetnik Movement". On 23 February 1991, **Vojislav ŠEŠELJ** was appointed President of the newly founded "Serbian Radical Party" ("SRS"). In June 1991, he was elected a member of the Assembly of the Republic of Serbia. In almost daily rallies and election campaigns, he called for Serb unity and war against Serbia's "historic enemies", namely the ethnic Croat, Muslim and Albanian populations within the territories of the former Yugoslavia. Additional relevant historical and political facts are set out in Annex I to this indictment.

### **INDIVIDUAL CRIMINAL RESPONSIBILITY**

#### **Article 7(1) of the Statute of the Tribunal**

5. **Vojislav ŠEŠELJ** is individually criminally responsible for the crimes referred to in Articles 3 and 5 of the Statute of the Tribunal and described in this indictment, which he planned, ordered, instigated, committed or in whose planning, preparation, or execution he otherwise aided and abetted. By using the word "committed" in this indictment, the Prosecutor does not intend to suggest that the accused physically committed **all** of the crimes charged personally. Physical commitment is pleaded only in relation to the charges of persecutions (Count 1) by direct and public ethnic denigration (paragraphs 15 and 17(k)) with respect to the Accused's speeches in Vukovar, Mali Zvornik and Hrtkovci, and by deportation and forcible transfer (paragraphs 15 and 17(i)) with respect to the Accused's speech in Hrtkovci, and in relation to the charges of deportation and inhumane acts (forcible transfer) (Counts 10 – 11, paragraphs 31 - 33), with respect to the Accused's speech in Hrtkovci. "Committed" in this indictment includes the participation of **Vojislav ŠEŠELJ** in a joint criminal enterprise as a co-perpetrator. By using the word "instigated", the Prosecution charges that the accused **Vojislav ŠEŠELJ's** speeches, communications, acts and/or omissions contributed to the perpetrators' decision to commit the crimes alleged.

6. **Vojislav ŠEŠELJ** participated in a joint criminal enterprise. The purpose of this joint criminal enterprise was the permanent forcible removal, through the commission of crimes in violation of Articles 3 and 5 of the Statute of the Tribunal, of a majority of the Croat, Muslim and other non-Serb populations from approximately one-third of the territory of the Republic of Croatia ("Croatia"), and large parts of Bosnia and Herzegovina, and from parts of Vojvodina, in the Republic of Serbia ("Serbia"), in order to make these areas part of a new Serb-dominated state. With respect to Croatia the areas included those regions that were referred to by Serb authorities as the "SAO Krajina" (i.e. the Serb Autonomous Region of Krajina), the "SAO Western Slavonia", and the "SAO Slavonia, Baranja and Western Srem" (after 19 December 1991, the "SAO Krajina" became known as the RSK ("Republic of

Serbian Krajina"); on 26 February 1992, the "SAO Western Slavonia" and the "SAO Slavonia, Baranja and Western Srem" joined the RSK), as well as the "Dubrovnik Republic /*Dubrovačka republika*". With respect to Bosnia and Herzegovina, the areas included Bosanski Šamac, Zvornik, five municipalities collectively known as "Greater Sarajevo" (Ilijaš, Vogošća, Novo Sarajevo, Ilidža and Rajlovac), Bijeljina, Mostar, Nevesinje and Brčko.

7. The crimes enumerated in this indictment were within the object of the joint criminal enterprise and **Vojislav ŠEŠELJ** had the knowledge and intention necessary for the commission of each of the crimes. Alternatively, the crimes enumerated in Counts 1 to 9 and 12 to 14 of the indictment were the natural and foreseeable consequences of the execution of the object of the joint criminal enterprise and **Vojislav ŠEŠELJ** was aware that such crimes were the possible outcome of the execution of the joint criminal enterprise.

8. The aforesaid joint criminal enterprise came into existence before 1 August 1991 and continued at least until December 1995. **Vojislav ŠEŠELJ** participated in the joint criminal enterprise until September 1993 when he had a conflict with Slobodan Milošević. **Vojislav ŠEŠELJ** worked in concert with several individuals in the joint criminal enterprise to succeed in its objective. Each participant or co-perpetrator within the joint criminal enterprise played his or her role or roles that significantly contributed to the objective of the enterprise. Other individuals participating in this joint criminal enterprise included Slobodan MILOŠEVIĆ, General Veljko KADIJEVIĆ, General Blagoje ADŽIĆ, Colonel Ratko MLADIĆ, Jovica STANIŠIĆ, Franko SIMATOVIĆ also known as "Frenki", Radovan STOJČIĆ, also known as "Badža", Milan MARTIĆ, Goran HADŽIĆ, Radovan KARADŽIĆ, Momčilo KRAJIŠNIK, Biljana PLAVŠIĆ, Željko RAŽNATOVIĆ, also known as "Arkan", and other members of the Yugoslav People's Army ("JNA"), later the Yugoslav Army ("VJ"), the newly-formed Serb Territorial Defence ("TO") of Croatia and of Bosnia and Herzegovina, the army of the *Republika Srpska Krajina* ("SVK") and the army of the *Republika Srpska* ("VRS"), and the TOs of Serbia and of Montenegro, local Serb, Republic of Serbia and Republika Srpska police forces ("MUP forces"), including the State Security/*Državna bezbednost* ("DB") Branch of the Ministry of Interior of the Republic of Serbia, and Serb special police forces of the SAO Krajina and the RSK commonly referred to as "Martić's Police", *Martićevci*, "SAO Krajina Police" or "SAO Krajina Milicija" (hereinafter "Martić's Police") and members of Serbian, Montenegrin, Bosnian and Croatian Serb paramilitary forces and volunteer units including "Chetniks", or "Šešeljevci" (translated into English as "Šešelj's men") (collectively, "Serb forces"), and other political figures from the (S)FRY, the Republic of Serbia, the Republic of Montenegro and the Bosnian and Croatian Serb leadership.

9. **Vojislav ŠEŠELJ**, as President of the SRS, was a prominent political figure in the SFRY/FRY in the time period relevant to this indictment. He propagated a policy of uniting "all Serbian lands" in a homogeneous Serbian state. He defined the so-called Karlobag-Ogulin-Karlovac-Virovitica line as the western border of this new Serbian state (which he called "Greater Serbia") which included Serbia, Montenegro, Macedonia and considerable parts of Croatia and Bosnia and Herzegovina.

**10. Vojislav ŠEŠELJ**, acting alone and in concert with other members of the joint criminal enterprise, participated in the joint criminal enterprise in the following ways:

- a. He participated in the recruitment, formation, financing, supply, support and direction of Serbian volunteers connected to the SRS, commonly known as "Chetniks", or "Šešeljevci". These volunteer units were created and supported to assist in the execution of the joint criminal enterprise through the commission of crimes in violation of Articles 3 and 5 of the Statute of the Tribunal.
- b. He made inflammatory speeches in the media, during public events, and during visits to the volunteer units and other Serb forces in Croatia and Bosnia and Herzegovina, instigating those forces to commit crimes in violation of Articles 3 and 5 of the Statute of the Tribunal.
- c. He espoused and encouraged the creation of a homogeneous "Greater Serbia", encompassing the territories specified in this indictment, by violence, and thereby participated in war propaganda and incitement of hatred towards non-Serb people.
- d. In public speeches he called for the expulsion of Croat civilians from parts of the Vojvodina region in Serbia and thus instigated his followers and the local authorities to engage in a persecution campaign against the local Croat population.
- e. He participated in the planning and preparation of the take-over of towns and villages in two SAOs in Croatia and in the municipalities of Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar, Nevesinje and Brčko in Bosnia and Herzegovina and the subsequent forcible removal of the majority of the non-Serb population from these areas.
- f. He participated in the provision of financial, material, logistical and political support necessary for such take-overs. He obtained this support, with the help of Slobodan Milošević, from the Serbian authorities and from Serbs living abroad where he collected funds to support the aim of the joint criminal enterprise.
- g. He recruited Serbian volunteers connected to the SRS and indoctrinated them with his extreme ethnic rhetoric so that they engaged in the forcible removal of the non-Serb population in the targeted territories through the commission of crimes as specified in this indictment with particular violence and brutality.

**11. Vojislav ŠEŠELJ** knowingly and wilfully participated in the joint criminal enterprise, sharing the intent of other participants in the joint criminal enterprise or being aware of the foreseeable consequences of their actions. On this basis, he bears individual criminal responsibility for the crimes under Article 7(1) of the Statute of the Tribunal, in addition to his responsibility under the same Article for having planned, ordered instigated, physically committed or otherwise aided and abetted in the planning, preparation and execution of those crimes.

## **GENERAL LEGAL ALLEGATIONS**

12. At all times relevant to this indictment, a state of armed conflict existed in Croatia and Bosnia and Herzegovina. A nexus existed between this state of armed conflict and the alleged crimes in Croatia, Bosnia and Herzegovina, and parts of Vojvodina, Serbia.

13. At all times relevant to this indictment, **Vojislav ŠEŠELJ** was required to abide by the laws and customs governing the conduct of armed conflicts.

14. Conduct charged as crimes against humanity was part of a widespread or systematic attack directed against the Croat, Muslim and other non-Serb civilian populations within large areas of Croatia, Bosnia and Herzegovina and Vojvodina, Serbia.

## **THE CHARGES:**

### **COUNT 1**

#### **(PERSECUTIONS)**

15. From on or about 1 August 1991 until at least September 1993, **Vojislav ŠEŠELJ**, acting individually or in concert with known and unknown members of the joint criminal enterprise, planned, ordered, instigated, committed or otherwise aided and abetted in the planning, preparation or execution of persecutions of Croat, Muslim and other non-Serb civilian populations in the territories of the SAO Western Slavonia and the SAO SBWS (Slavonia, Baranja and Western Srem), and in the municipalities of Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar, Nevesinje and Brčko in Bosnia and Herzegovina and parts of Vojvodina in Serbia.

16. Throughout this period, Serb forces, comprising JNA (and subsequently the VJ) units, local Serb TO units (which were subsequently transformed into the army of the RSK ("SVK") and the army of the *Republika Srpska* ("VRS")), and TO units from Serbia and Montenegro, local Serb and Republic of Serbia MUP police units and volunteer and paramilitary units, including the volunteers recruited and/or instigated by **Vojislav ŠEŠELJ**, attacked and took control of towns and villages in these territories. After the take-over, these Serb forces, in co-operation with the local Serb authorities, established a regime of persecutions designed to drive the non-Serb civilian population from these territories.

17. These persecutions were committed on political, racial and religious grounds and included:

- a. The extermination or murder of many Croat, Muslim and other non-Serb civilians, including women, children and elderly persons, in the municipality of Vukovar and the villages of Voćin, Hum, Bokane and Krasković in Croatia, in the municipalities of Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar and Nevesinje in Bosnia and Herzegovina, as described in detail in paragraphs 18 to 27.

- b. The prolonged and routine imprisonment and confinement of Croat, Muslim and other non-Serb civilians in the detention facilities within

Croatia and Bosnia and Herzegovina, including prison camps in Vukovar, in and near Voćin, and in Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar, Nevesinje and Brčko, as described in detail in paragraphs 28 to 30.

- c. The establishment and perpetuation of inhumane living conditions for Croat, Muslim and other non-Serb civilian detainees within the detention facilities referred to.
- d. The repeated torture, beatings and killings of Croat, Muslim and other non-Serb civilian detainees in the said detention facilities.
- e. The prolonged and frequent forced labour of Croat, Muslim and other non-Serb civilians detained in the said detention facilities or under house arrest in their respective homes in Vukovar, Voćin, Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar and Brčko. The forced labour included digging of graves, loading of ammunition for the Serb forces, digging of trenches and other forms of manual labour at the frontlines.
- f. The sexual assaults of Croat, Muslim and other non-Serb civilians by Serb soldiers during capture and in the detention facilities.
- g. The imposing of restrictive and discriminatory measures against the Croat, Muslim and other non-Serb civilian populations, including persons in Voćin in Croatia and Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar and Nevesinje in Bosnia and Herzegovina, and in parts of Vojvodina, Serbia, such as restriction of movement; removal from positions of authority in local government institutions and the police; dismissal from jobs; denial of medical care, and arbitrary searches of homes.
- h. The torture, beating and robbing of Croat, Muslim and other non-Serb civilians.
- i. The deportation or forcible transfer of tens of thousands of Croat, Muslim and other non-Serb civilians from the territories as specified above, and from parts of Vojvodina, Serbia as described in detail in paragraphs 31 to 33.
- j. The deliberate destruction of homes, other public and private property, cultural institutions, historic monuments and sacred sites of the Croat, Muslim and other non-Serb civilian populations in the municipality of Vukovar and in Voćin, in Croatia, and in the municipalities of Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar and Nevesinje in Bosnia and Herzegovina as described in detail in paragraph 34.
- k. The direct and public denigration through "hate speech" of the Croat, Muslim and other non-Serb populations in Vukovar, Zvornik and Hrtkovci on the basis of their ethnicities.

By his participation in these acts, **Vojislav ŠEŠELJ** committed:

**Count 1:** Persecutions on political, racial or religious grounds, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(h) and 7(1) of the Statute of the Tribunal.

## COUNTS 2 TO 4

### (EXTERMINATION and MURDER)

**18.** From on or about 1 August 1991 until June 1992 in the territory of the SAO SBWS in Vukovar and the SAO Western Slavonia in Voćin, from on or about 1 March 1992 until at least September 1993 in the municipalities of Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar and Nevesinje in Bosnia and Herzegovina, **Vojislav ŠEŠELJ**, acting individually or in concert with other known and unknown members of a joint criminal enterprise, planned, ordered, instigated, committed or otherwise aided and abetted in the planning, preparation, or execution of the extermination and murder of Croat, Muslim and other non-Serb civilians as specified in paragraphs 19 to 27 of this indictment.

#### **CROATIA**

#### **SAO WESTERN SLAVONIA**

**19.** Beginning in August 1991, Serb forces including the volunteer units known as "Šešelji's men" were in control of Voćin. In November 1991 **Vojislav ŠEŠELJ** visited Voćin and addressed the volunteers. Incited by **Vojislav ŠEŠELJ**'s speeches, the volunteer units, in particular "Šešelji's men", started burning houses of Croat citizens and killing Croat civilians in the villages of Voćin, Hum, Bokane and Krasković until their withdrawal from the region on 13 December 1991. They went from house to house and killed whomever they found, in total **forty-three** civilians. Some of those who hid survived. The names of the victims are set out in Annex II attached to this indictment.

#### **SAO SBWS - VUKOVAR**

**20.** In November 1991 while Serb forces fought to take over Vukovar, **Vojislav ŠEŠELJ** visited the town and publicly pronounced "Not one Ustasha must leave Vukovar alive", thus instigating the killing of Croats. On or about 20 November 1991, as part of the overall persecution campaign, Serb military forces including members of the JNA and TO and volunteer and paramilitary forces under the command, control or influence of the JNA, the TO SBWS and other participants of the joint criminal enterprise, including volunteers recruited and/or incited by **Vojislav ŠEŠELJ**, removed approximately four hundred Croats and other non-Serbs from Vukovar Hospital in the aftermath of the Serb take-over of the city. Approximately three hundred of these non-Serbs were transported to the JNA barracks and then to the Ovčara farm located about 5 kilometres south of Vukovar. There, members of the Serb forces beat and tortured the victims for hours. During the evening of 20 November 1991, the soldiers transported the victims in groups of 10-20 to a remote execution site between the Ovčara farm and Grabovo, where they shot and killed approximately **two hundred and fifty-five** non-Serbs from Vukovar Hospital. Their

bodies were buried in a mass grave. The names of the murder victims are set out in Annex III attached to this indictment.

21. After Serb forces took control of Vukovar on 18 November 1991, over one thousand civilians gathered at the Velepromet facility. Some were compelled to go there by Serb forces and others went voluntarily seeking protection. By 19 November 1991, approximately two thousand people were gathered inside the Velepromet facility. The JNA considered about eight hundred of these persons to be prisoners of war. By the evening of 19 November 1991, shortly after the JNA began to transfer the alleged prisoners of war to their Sremska Mitrovica detention facility in Serbia, Serb forces, including volunteers recruited and/or incited by **Vojislav ŠEŠELJ**, separated a number of individuals from the alleged group of prisoners of war. They took these selected individuals out of the Velepromet facility and killed them. The bodies of some of those killed were transported to the Ovčara farm and buried there in the mass grave while the bodies of six other victims were left lying on the ground behind the Velepromet facility. The names of these six victims are set out in Annex IV attached to this indictment.

## **B O S N I A and H E R Z E G O V I N A**

### **Z V O R N I K**

22. In March 1992, Vojislav ŠEŠELJ gave a speech at a rally in Mali Zvornik, located across the Drina river from Zvornik. Vojislav ŠEŠELJ said: "Dear Chetnik brothers, especially you across the Drina river, you are the bravest ones. We are going to clean Bosnia of pagans and show them a road which will take them to the east, where they belong", thus instigating the persecution of non-Serbs in Zvornik. In April 1992, Serb forces, including volunteers known as "Šešelj's men" and "Arkan's tigers", attacked and took control of the town of Zvornik and surrounding villages. During the attack, Serb forces killed many non-Serb civilians. On or about 9 April 1992, members of Arkan's unit executed twenty Bosnian Muslim and Croat men and boys in Zvornik town. Following the take-over, non-Serbs were routinely detained, beaten, tortured and killed. Hundreds of non-Serb civilians were detained in or near Zvornik from April to July 1992 in the "Standard" shoe factory, the "Ciglana" factory, the Ekonomija farm, the Drinjača Dom Kulture and the Čelopek Dom Kulture. On or about 12 May 1992, at the Ekonomija farm, Serb forces, including the leader of a group of "Šešelj's men", beat to death a detainee named Nesib Dautović. In June or July 1992, Serb forces, including volunteers known as "Šešelj's men", killed a non-Serb male detainee at the "Ciglana" factory. Between 30 and 31 May 1992, Serb forces, including a group of "Šešelj's men", tortured and killed 88 Bosnian Muslim males at Drinjača Dom Kulture. Between 1 and 5 June 1992, Serb forces killed more than 150 Bosnian Muslim males at Karakaj Technical School. Between 7 and 9 June 1992, Serb forces killed more than 150 detainees at Gero's slaughter-house. Serb forces killed more than forty non-Serb male detainees between 1 and 26 June 1992 at Čelopek Dom Kulture. The names of the identified victims at the "Ciglana" factory, Drinjača Dom Kulture, Karakaj Technical School, Gero's slaughter-house and Čelopek Dom Kulture are set out in Annex V to this indictment.



**BOSANSKI ŠAMAC**

23. In April 1992, Serb forces, including volunteers known as "Šešelj's men", attacked and took control of the town of Bosanski Šamac and surrounding villages. Following the take-over, hundreds of non-Serbs were routinely detained, beaten and tortured in the police headquarters building ("SUP"), the Territorial Defence building ("TO"), the primary and secondary schools, as well as the warehouse of the agricultural co-operative located in Crkvina, to the south-west of the town of Bosanski Šamac, and dozens were killed. On or about 7 May 1992, two leaders of a unit of "Šešelj's men" shot and killed eighteen men and boys in the warehouse of the agricultural co-operative in Crkvina. The names of the victims at Crkvina are set out in Annex VI to this indictment.

**"GREATER SARAJEVO"**

24. Beginning in April 1992, Serb forces, including volunteers known as "Šešelj's men", attacked and took control of towns and villages in the area of "Greater Sarajevo" including the town of Ilijaš and the village of Lješevo in Ilijaš municipality, the village of Svake in Vogošća municipality and the neighborhood of Grbavica in Novo Sarajevo municipality. Following the take-over, non-Serbs were routinely detained, beaten, tortured and killed. On or about 5 June 1992, members of a unit of "Šešelj's men" killed 22 non-Serb civilians in the village of Lješevo. During the summer of 1993, members of a unit of "Šešelj's men" cut off the head of a civilian and killed four prisoners-of-war in the area of Crna Rijeka in Ilijaš municipality. In the summer of 1993, members of a unit of "Šešelj's men" killed twenty-five non-Serb men who were being used as "human shields", and two non-Serb men who refused to act as "human shields", at Žuč in Vogošća municipality. On 17 July 1993, members of a unit of "Šešelj's men" on Mount Igman in Ilidža municipality killed two prisoners-of-war named Živko Krajišnik and Rusmir Hamalukić. The names of identified victims of murder/extermination at Lješevo and Žuč are set out in Annex VII to this indictment.

**BIJELJINA**

25. In March 1992, Vojislav ŠEŠELJ visited members of the Serbian Radical Party in the town of Bijeljina to plan the Serb takeover of the Bijeljina municipality and the subsequent persecution campaign of non-Serbs. On 31 March 1992, Serb forces, including volunteers known as "Šešelj's men", attacked and took control of the town of Bijeljina and villages in the municipality of Bijeljina. During the take-over of the town of Bijeljina, Serb forces, including volunteers known as "Šešelj's men", executed six civilians. After the take-over, non-Serbs were routinely detained, beaten, sexually assaulted, tortured and killed. Between April 1992 and September 1993, hundreds of non-Serbs were detained in the SUP building in the town of Bijeljina and in Batković camp near the town of Bijeljina. Up to one hundred detainees died as the result of mistreatment and inhumane conditions at the Batković camp. The names of the identified victims of murder/extermination at Bijeljina and the Batković camp are set out in Annex VIII to this indictment.

**MOSTAR**

26. Between April 1992 and June 1992, Serb forces, including volunteers known as "Šešelj's men", attacked and took control of the town of Mostar and surrounding

villages. Following the attack, non-Serbs were routinely detained, beaten, tortured, and killed. On or about 13 June 1992 Serb forces, including volunteers known as "Šešelj's men", arrested and transported eighty-eight non-Serb civilians from the neighbourhood of Zalik and from the villages of Potoci, Kuti Livač, Vrapčići and other nearby villages to Vrapčići football stadium, detained them in the locker room, and subsequently killed them. The bodies of these non-Serbs were found in the dump in Uborak. Additionally, on or about 13 June 1992, eighteen non-Serb civilians from Zalik were arrested and transported to the city mortuary in Sutina. They were subsequently killed in Sutina in the vicinity of the city mortuary and dumped near the Neretva River in a pit. "Šešelj's men" participated in the detention and killings. The names of identified victims of murder/extermination at Uborak and Sutina are set out in Annex IX to this indictment.

#### NEVESINJE

27. In June 1992, Serb forces, including volunteers known as "Šešelj's men", took control of the town of Nevesinje and attacked Muslim villages in the municipality. During this time, non-Serbs were routinely detained, beaten, tortured, and killed. On or about 22 June 1992, seventy-six Muslim civilians were arrested in the woods in the area of Velež by Serb forces, including volunteers known as "Šešelj's men", and taken to the primary school in the village of Dnopolje in Zijemlje Valley. The men were separated from the women and children. The men were killed. Their bodies were found in a place known as "Teleća Lastva". The women and children were transported to and detained in the heating factory in Kilavci, Nevesinje. Forty-four of them were killed at the dump pit at Lipovača. "Šešelj's men" participated in the detention and killing. Five of the women from the heating factory were further detained at the resort at Boračko Jezero, part of the Konjic municipality, used by Serb forces, including "Šešelj's men", as a military post. Two of the five women detained at that location, Fadila and Mirsada Mahinić, were subsequently killed. On or about 26 June 1992, eleven Muslim civilians from the areas of Hrušta and Kljuna were arrested in Teleća Lastva. They were detained and tortured in the primary school in Zijemlje. Seven were taken away and subsequently killed. Their bodies were found in a pit in Zijemlje. "Šešelj's men" participated in these killings. Also in June 1992, Serb forces, including "Šešelj's men", arrested and detained twenty Muslims civilians from Lakat at the resort at Boračko Jezero and subsequently killed nineteen of them on the mountain of Borašnica in Nevesinje. The names of identified victims of murder/extermination at the Lipovača pit and Mt. Borašnica, as well as the names of identified victims of murder/extermination whose bodies were found at "Teleća Lastva" and the pit at Zijemlje are set out in Annex X to this indictment.

By his participation in these acts, **Vojislav ŠEŠELJ** committed:

**Count 2:** Extermination, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(b) and 7(1) of the Statute of the Tribunal.

**Count 3:** Murder, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(a) and 7(1) of the Statute of the Tribunal.

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

**COUNTS 5 to 9**  
**(IMPRISONMENT, TORTURE,**  
**OTHER INHUMANE ACTS and CRUEL TREATMENT)**

**28.** From August 1991 until September 1993, **Vojislav ŠEŠELJ**, acting individually or in concert with other known and unknown members of a joint criminal enterprise, planned, ordered, instigated, committed or otherwise aided and abetted in the planning, preparation or execution of the imprisonment under inhumane conditions of Muslim, Croat and other non-Serb civilians in the territories listed above.

**29.** Serb military forces, comprising JNA (and subsequently the VJ), Croatian and Bosnian Serb TO units (which were subsequently transformed into the army of the RSK ("SVK") and the army of the Republika Srpska ("VRS")), volunteer and paramilitary units, including those volunteer units recruited and/or incited by **Vojislav SEŠELJ**, acting in co-operation with local police staff and local Serb authorities, captured and detained hundreds of Croat, Muslim and other non-Serb civilians. They were detained in the following short- and long-term detention facilities:

- a) The Velepromet warehouse, Vukovar, SAO SBWS, November 1991, run by JNA, approximately twelve hundred detainees.
- b) The Ovčara farm, near Vukovar, SAO SBWS, November 1991, run by JNA, approximately three hundred detainees.
- c) The basement of the bank building in Voćin in October 1991, several detainees.
- d) The "Lager Sekulinci" near Voćin in August 1991, three detainees.
- e) The "Standard" shoe factory, the "Ciglana" factory, the Ekonomija farm, the Drinjača Dom Kulture, the Karakaj Technical School, Gero's slaughter-house and the Čelopek Dom Kulture in Zvornik, Bosnia and Herzegovina between April and July 1992, hundreds of detainees.
- f) The police headquarters building ("SUP"), the Territorial Defence building ("TO"), the primary and secondary schools in Bosanski Šamac, and the warehouse in the agricultural co-operative in Crkvina, near Bosanski Šamac, in Bosnia and Herzegovina, between April and September 1992, hundreds of detainees.
- g) The "Iskra" warehouse in the village of Podlugovi, Ilijaš municipality, "Planja's house" in the village of Svrake, Vogošća municipality, "Sonja's house" in Vogošća municipality, the barracks in Semizovac village, Vogošća municipality and the tire repair garage at the Vogošća crossroad in Vogošća municipality between April 1992 and September 1993, dozens of detainees.
- h) The SUP building in the town of Bijeljina and the Batković detention camp near the town of Bijeljina between April 1992 and September 1993, hundreds of detainees.
- i) The "Luka Camp" in the municipality of Brčko between May and July 1992, hundreds of detainees.
- j) The city mortuary in Sutina, Mostar and the stadium in Vrapčići, Mostar during June 1992, more than one hundred detainees.
- k) The basement of the heating factory in Kilavci, Nevesinje, the resort at Boračko Jezero, Nevesinje, the primary school in Zijemlje, Nevesinje

and the SUP building in Nevesinje during June 1992, more than one hundred detainees.

**30.** The living conditions in these detention facilities were brutal and characterised by inhumane treatment, overcrowding, starvation, forced labour, inadequate medical care and systematic physical and psychological assault, including torture, beatings and sexual assault.

By his participation in these acts, **Vojislav ŠEŠELJ** committed:

**Count 5:** Imprisonment, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(e) and 7(1) of the Statute of the Tribunal.

**Count 6:** Torture, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(f) and 7(1) of the Statute of the Tribunal.

**Count 7:** Inhumane acts, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(i) and 7(1) of the Statute of the Tribunal.

**Count 8:** Torture, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR** as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) of the Statute of the Tribunal.

**Count 9:** Cruel Treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR** as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) of the Statute of the Tribunal.

#### **COUNTS 10 to 11**

#### **(DEPORTATION, FORCIBLE TRANSFER)**

**31.** From on or about 1 August 1991 until May 1992 in the SAOs in Croatia and the RSK, from on or about 1 March 1992 until at least September 1993 in Bosnia and Herzegovina, and between May and August 1992 in parts of Vojvodina, Serbia, **Vojislav ŠEŠELJ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise, planned, instigated, committed, or otherwise aided and abetted in the planning, preparation, or execution of the deportation or forcible transfer of the Croat, Muslim and other non-Serb civilian populations from their legal domiciles, in Vukovar (SAO SBWS) in November 1991 and in Voćin (SAO Western Slavonia) in November and December 1991, in the municipality of Zvornik in Bosnia and Herzegovina between March 1992 and September 1993, in the municipality of Bosanski Šamac in Bosnia and Herzegovina between April 1992 and September 1993, in "Greater Sarajevo" in Bosnia and Herzegovina between April 1992 and September 1993, in the municipality of Bijeljina in Bosnia and Herzegovina between March 1992 and September 1993, in the municipality of Nevesinje in Bosnia and Herzegovina between June 1992 and September 1993 and in parts of Vojvodina, Serbia, including the village of Hrtkovci, between May and August 1992.

**32.** In order to achieve this objective, Serb forces comprising JNA (and subsequently the VJ), local Croatian and Bosnian Serb TO units (which were subsequently transformed into the army of the RSK ("SVK") and the army of the

*Republika Srpska* ("VRS")) and those from the Republic of Serbia and Montenegro, and volunteers and paramilitaries, including the "White Eagles" and "Dušan Silni", as well as volunteers recruited and/or incited by **Vojislav ŠEŠELJ**, in co-operation with local and Serbian police units, surrounded Croatian and Bosnian towns and villages and demanded that the inhabitants surrender their weapons, including legally owned hunting rifles. Then, the towns and villages were attacked or otherwise taken-over, even those where the inhabitants had complied with the demands. These attacks were intended to compel the population to flee. After taking control of the towns and villages, the Serb forces sometimes rounded up the remaining Croat, Muslim and other non-Serb civilian populations and forcibly transported them to locations within Croatia or Bosnia and Herzegovina not controlled by Serbs, or deported them to locations outside Croatia or Bosnia and Herzegovina, in particular Serbia and Montenegro. On other occasions, Serb forces, in co-operation with the local Serb authorities, imposed restrictive and discriminatory measures on the non-Serb population and engaged in a campaign of terror designed to drive them out of the territory. The majority of the non-Serbs that remained were deported or forcibly transferred from their homes on a later date.

**33.** In May 1992, **Vojislav ŠEŠELJ** came to Vojvodina and met with his associates in the SRS. **Vojislav ŠEŠELJ** instructed his associates to contact non-Serbs and threaten them with death if they did not leave the area. On 6 May 1992 **Vojislav ŠEŠELJ** gave an inflammatory speech in the village of Hrtkovci, Vojvodina, calling for the expulsion of Croats from the area and reading a list of individual Croat residents who should leave for Croatia. As a result of this speech, a number of Croat residents decided to leave Hrtkovci. After this speech, supporters and associates of the accused, including members of the SRS and the SČP ("Srpski Četnički Pokret"/"Serbian Chetnik Movement"), began a campaign of ethnic cleansing directed at non-Serbs, particularly Croats, in Hrtkovci. During the next three months, many non-Serbs were harassed, threatened with death and intimidated, forcing them to leave the area. Homes of Croats were looted and occupied by Serbs. Serb families who had been displaced from other parts of the former Yugoslavia often occupied the homes of those non-Serbs who were compelled to leave.

By his participation in these acts, **Vojislav ŠEŠELJ** committed:

**Count 10:** Deportation, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(d) and 7(1) of the Statute of the Tribunal.

**Count 11:** Inhumane Acts (Forcible Transfers), a **CRIME AGAINST HUMANITY**, punishable under Articles 5(i) and 7(1) of the Statute of the Tribunal.

#### **COUNTS 12 to 14**

#### **(WANTON DESTRUCTION and PLUNDER OF PUBLIC OR PRIVATE PROPERTY)**

**34.** From on or about 1 August 1991 until May 1992 in the territories of the SAOs in Croatia and the RSK, from on or about 1 March 1992 until at least September 1993 in the municipalities of Bosanski Šamac, Zvornik, "Greater Sarajevo", Bijeljina, Mostar and Nevesinje in Bosnia and Herzegovina, **Vojislav ŠEŠELJ**, acting individually or in concert with other known and unknown members of the joint

criminal enterprise, planned, ordered, instigated, committed, or otherwise aided and abetted in the planning, preparation, or execution of the wanton destruction and plunder of public and private property of the Croat, Muslim and other non-Serb populations, acts which were not justified by military necessity. This intentional and wanton destruction and plunder included the plunder and destruction of homes and religious and cultural buildings, and took place in the following towns and villages:

SAO SBWS: Vukovar; (hundreds of homes destroyed)

SAO Western Slavonia: Voćin and Hum; (dozens of homes and a Catholic church destroyed) and

Bosnia and Herzegovina: Bosanski Šamac (hundreds of homes and a mosque destroyed), Zvornik (hundreds of homes, four mosques and a religious archive destroyed) "Greater Sarajevo" (homes, mosques and a Catholic church destroyed in the municipality of Ilijaš; homes, mosques and a Catholic church destroyed in the municipality of Vogošća); Bijeljina (the Catholic Church desecrated and five mosques destroyed in the town of Bijeljina; two mosques destroyed in the village of Janja and four mosques destroyed in other villages); Mostar (hundreds of homes and several mosques destroyed) and Nevesinje (dozens of homes and seven mosques destroyed).

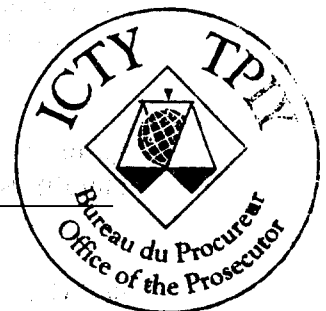
By his participation in these acts, Vojislav ŠEŠELJ committed:

**Count 12:** Wanton destruction of villages, or devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(b) and 7(1) of the Statute of the Tribunal.

**Count 13:** Destruction or wilful damage done to institutions dedicated to religion or education, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7(1) of the Statute of the Tribunal.

**Count 14:** Plunder of public or private property, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(e) and 7(1) of the Statute of the Tribunal.

  
Carla Del Ponte  
Prosecutor



Dated this 12<sup>th</sup> Day of July 2005  
In The Hague  
The Netherlands

## ANNEX I

## ANNEX I

### ADDITIONAL HISTORICAL AND POLITICAL FACTS

#### Croatia

1. In advance of the 1990 elections, the nationalistic Serbian Democratic Party ("SDS"), which advocated the autonomy and later secession of predominately-Serb areas from Croatia, was founded in Knin. **Vojislav ŠEŠELJ** maintained contact with the leaders of the SDS. He attended meetings of the SDS and took part in SDS political events.
2. On 25 July 1990, a group of SDS leaders established the Serbian National Council ("SNC"), adopting a Declaration on Autonomy and the Position of Serbs in Croatia, and on the Sovereignty and Autonomy of the Serbian Nation.
3. On 30 July 1990, during the SNC's first constituent session, a referendum, which would confirm the autonomy and sovereignty of the Serb nation in Croatia, was scheduled.
4. On 17 August 1990, Serbs in Knin put up barricades after the Croatian government declared the referendum illegal.
5. Between 19 August and 2 September 1990, Croatian Serbs held a referendum on the issue of Serb "sovereignty and autonomy" in Croatia. The vote took place in predominately Serb areas of Croatia and was limited only to Serb voters. Croats who lived in the affected region were barred from participating in the referendum. The result of the vote was overwhelmingly in support of Serb autonomy. On 30 September 1990, the SNC declared "the autonomy of the Serbian people on ethnic and historic territories on which it lives and which are within the current boundaries of the Republic of Croatia as a federal unit of the Socialist Federal Republic of Yugoslavia".
6. On 21 December 1990, Croatian Serbs in Knin announced the creation of a "Serbian Autonomous District" (SAO) of Krajina and subsequently declared their independence from Croatia.
7. On 7 January 1991, the Serbian National Council (SNC) for Slavonia, Baranja and Western Srem ("SBWS") was formed in Šidski Banovci.
8. Conflicts between armed Serbs and Croatian police forces erupted throughout the Spring of 1991.
9. In March 1991, the conflict intensified with clashes in Pakrac and Plitvice. At Plitvice on 31 March 1991, Serbs attacked a bus carrying Croatian policemen and another battle erupted. The JNA deployed troops in the area and issued an ultimatum to the Croatian police to withdraw from Plitvice. **Vojislav ŠEŠELJ** and some of his volunteers took part in the events in Plitvice, SAO Krajina. In discussions with the JNA officers he introduced himself as "Vojvoda". He made extreme nationalistic speeches inciting the local population to engage in violence against the Croatian police.



10. On 1 April 1991, the Executive Council of the SAO Krajina adopted a resolution to incorporate the SAO Krajina into the Republic of Serbia. At the same time the SAO Krajina recognised the constitution and laws of Serbia as well as the SFRY constitutional-legal system and decided that the laws and regulations of Serbia applied throughout the territory.

11. In the end of April 1991, armed local Serbs assisted by Šešelj's men and other Serbian volunteers erected barricades in the village of Borovo Selo near Vukovar. On 1 May 1991, these armed Serbs took hostage a number of Croatian policemen who were sent to restore law and order in Borovo Selo. On 2 May, the Croatian police authorities in Osijek sent a larger group of heavily armed policemen to Borovo Selo to free the hostages. Local armed Serbs assisted by Šešelj's men and other Serbian volunteers ambushed this group of policemen. Twelve Croatian policemen were killed and twenty injured in the fighting.

12. On 12 May 1991, a referendum was held in the SAO Krajina, Slavonia, Baranja and Western Srem concerning the annexation of these regions to Serbia and the consolidation of these regions in Yugoslavia with Serbia, Montenegro and others that wished to preserve Yugoslavia. The annexation was supported by 99.8% of those who voted.

13. On 19 May 1991, Croatia held a referendum in which the electorate voted overwhelmingly for independence from the SFRY. On 25 June 1991, Croatia and the Republic of Slovenia declared their independence from the SFRY. On 25 June 1991, the JNA moved to suppress Slovenia's secession.

14. On 25 June 1991, the "Great National Assembly of SBWS" was formed in Bačka Palanka, Serbia at a meeting attended by representatives of all the Serb villages in the SBWS. The Great National Assembly decided that the region of SBWS was to be constituted as SAO SBWS and was to secede from Croatia. Goran Hadžić, until then President of the SNC, was elected Prime Minister designate.

15. The European Community sought to mediate in the conflict. On 8 July 1991, an agreement was reached that Croatia and Slovenia would suspend implementation of their independence until 8 October 1991. The European Community ultimately recognised Croatia as an independent state on 15 January 1992.

16. On 18 July 1991, the Federal Presidency, with the support of the Serbian and Montenegrin governments and General KADIJEVIĆ, voted to withdraw the JNA from Slovenia, thereby acceding to its secession and the dissolution of the SFRY.

17. The Serbs in the Krajina region, in Eastern Slavonia and in Western Slavonia, began receiving increasing support from the government of Serbia and the JNA. By August 1991, local Serb Territorial Defence, volunteer and police forces in these regions were being supplied, trained and partly led by the JNA and officials of the Serbian MUP. Throughout August and September 1991, large areas in Croatia came under Serb control as a result of actions by Serb military forces, including "Šešelj's men", the "White Eagles", and police forces.

18. During this period Vojislav ŠEŠELJ constantly appealed to the public to join

the war effort. He visited the frontlines on numerous occasions and held meetings with the local Serb leaders.

19. In the Serb occupied regions in Krajina, Slavonia, Baranja and Western Srem, the Croatian and other non-Serb populations were systematically driven out and the areas were incorporated into the various "Serbian Autonomous Districts" as specified above. The JNA remained deployed in the areas where the Serb insurgents had taken control, thereby securing their gains,

20. On 13 August 1991, the West Slavonian members of the presidency of the SDS of Slavonia held a session in Pakrac at which it was decided to declare the establishment of the "Serbian Autonomous District" ("SAO") Western Slavonia. The ethnic distribution of the population was used as the criteria for defining the territory of SAO Western Slavonia. The municipalities included in the SAO Western Slavonia were those whose representatives were present at the above session of the SDS Regional Board: Pakrac, Daruvar, Grubišno Polje, Podravska Slatina, Okučani, and parts of the Slavonska Požega and Orahovica municipalities. In these areas Serbs represented 50% or more of the total population.

21. In August 1991, Serb forces, led by the JNA, undertook operations against towns in Eastern Slavonia, resulting in their occupation. The Croat and other non-Serb populations of these areas were forcibly expelled. In late August, Serb forces laid siege to the city of Vukovar. By mid-October 1991, all other predominately Croat towns in Eastern Slavonia had been taken over by Serb forces except Vukovar. Non-Serbs were subjected to a brutal occupation regime consisting of persecution, murder, torture and other acts of violence. A large portion of the non-Serb population was eventually killed or forced from the occupied areas.

22. The siege of Vukovar continued until 18 November 1991 when the city fell to the Serb forces. During the course of the three-month siege, the city was largely destroyed by JNA shelling and hundreds of persons were killed. When the Serb forces occupied the city, hundreds of Croats were killed by Serb forces. Most of the non-Serb population of the city was expelled within days of its fall under Serb control.

23. In Geneva on 23 November 1991, Slobodan MILOŠEVIĆ, Federal Secretary of People's Defence Veljko KADIJEVIĆ, and Franjo TUĐMAN entered into an agreement signed under the auspices of the United Nations Special Envoy Cyrus VANCE. This agreement called for the lifting of blockades by Croatian forces on JNA barracks and for the withdrawal of JNA forces from Croatia. Both sides committed themselves to an immediate cease-fire throughout Croatia by units "under their command, control, or political influence" and further bound themselves to ensure that any paramilitary or irregular units associated with their forces would also observe the cease-fire.

24. On 19 December 1991, the SAO Krajina proclaimed itself the Republic of Serbian Krajina ("RSK") with Milan Babić as its first President. On 26 February 1992, the SAO Western Slavonia and SAO SBWS joined it in unilateral declarations by these entities.

25. Under the Vance Plan, three United Nations Protected Areas (UNPAs) were created (Krajina, Western Slavonia, SBWS), corresponding with four Sectors (South, North, West and East) in the areas occupied by Serb forces. The Vance Plan called for the withdrawal of the JNA from Croatia, the return of displaced persons to their homes in the UNPAs, and the demilitarisation of these UNPAs. Although the JNA officially withdrew from Croatia in May 1992, large portions of its weaponry and personnel remained in the Serb-held areas and were turned over to the "police" of the RSK. Displaced persons were not allowed to return to their homes and those few Croats and other non-Serbs who had remained in the Serb-occupied areas were expelled in the following months and years.

26. The Serb held territories in the RSK remained under Serb control until early May and early August 1995, respectively. In early May 1995, during Operation Flash, the Croatian authorities re-established control over Western Slavonia. In early August 1995, the Serb political and military leadership left most of Croatian territory during a massive Croatian operation. This operation, commonly referred to as "Operation Storm", restored Croatian control over most of the RSK territory. The remaining areas of Serb control in Eastern Slavonia, Baranja and Western Srem were peacefully re-integrated into Croatia in 1998.

**Bosnia and Herzegovina**

27. In November 1990, multi-party elections were held in Bosnia and Herzegovina. At the Republic level, the SDA ("Stranka Demokratske Akcije – Party of Democratic Action), the party of the Bosnian Muslims, won 86 seats; the SDS, the party of the Bosnian Serbs, won 72 seats and the HDZ (*Hrvatska demokratska zajednica* - Croatian Democratic Community) won 44 seats in the Assembly.

The central idea within the SDS political platform, as articulated by its leaders,

28. including Radovan KARADŽIĆ, Momčilo KRAJIŠNIK and Biljana PLAVŠIĆ, was the unification of all Serbs within one state. The SDS regarded the separation of Bosnia and Herzegovina from the SFRY as a threat to the interests of the Serbs.

The results of the November 1990 elections meant that, as time went on, the

29. SDS would be unable through peaceful means to keep Bosnia and Herzegovina in what was becoming a Serb-dominated Yugoslavia. As a result, Serb people within certain areas of Bosnia and Herzegovina, with Serb majorities, began to organise themselves into formal regional structures that they referred to as "Associations of Municipalities." In April 1991 the Association of Municipalities of Bosnian Krajina, centred in Banja Luka, was formed.

From Autumn 1991, the JNA began to withdraw its forces out of Croatia.

30. Forces under the control of the JNA began to re-deploy in Bosnia and Herzegovina. Many of these troops were deployed to areas in which there was no garrison or other JNA facility.

As the war continued in Croatia it appeared increasingly likely that Bosnia and

31. Herzegovina would also declare its independence from the SFRY. The SDS, realising it could not prevent the secession of Bosnia and Herzegovina from the SFRY, began the creation of a separate Serbian entity within Bosnia and Herzegovina. During the period from September to November 1991, several Serbian Autonomous Regions

were proclaimed in Serb-dominated Yugoslavia. As a result, both parties to the

Croatian War of Independence were engaged in the RSK negotiations, as part of a

process to achieve a final settlement that they referred to as "the final agreement

on the future of the RSK" that would lead to the reintegration of the RSK into the

Yugoslav federation. The SDS political platform, as articulated by its leaders,

including Radovan KARADŽIĆ, Momčilo KRAJIŠNIK and Biljana PLAVŠIĆ, was the

unification of all Serbs within one state. The SDS regarded the separation of

(SAO) were formed, some of them on the basis of the Associations of Municipalities referred to above.

**32.** On 12 September 1991, the Serbian Autonomous Region of Herzegovina was proclaimed. On 16 September 1991, the Assembly of the Association of Municipalities of Bosnian Krajina proclaimed the Autonomous Region of Krajina. By 21 November 1991, the Serbian Autonomous Regions and Autonomous Regions consisted of the Autonomous Region of Krajina, the SAO Herzegovina, the SAO Romanija-Birač, the SAO Semberija, and the SAO Northern Bosnia.

**33.** On 15 October 1991, at the meeting of the SDS Party Council, a decision was made to form a separate assembly entitled the "Assembly of the Serbian People of Bosnia and Herzegovina" to secure Serb interests.

**34.** On 24 October 1991, the Assembly of the Serbian People in Bosnia and Herzegovina, dominated by the SDS, decided to conduct a "Plebiscite of the Serbian People in Bosnia and Herzegovina" in order to decide whether to stay in the common state of Yugoslavia with Serbia, Montenegro, the Serbian Autonomous Region of Krajina, SAO Western Slavonia and SAO Eastern Slavonia, Baranja and Western Srem.

**35.** On 9 and 10 November 1991, the Bosnian Serbs held the plebiscite. The results overwhelmingly showed that the Bosnian Serbs wanted to stay in Yugoslavia.

**36.** On 11 December 1991, the Assembly of the Serbian People made a request to the JNA to protect with all available means as "integral parts of the State of Yugoslavia" the territories of Bosnia and Herzegovina in which the plebiscite of the Serbian people and other citizens on remaining in a joint Yugoslav state had been conducted.

**37.** On 9 January 1992, the Assembly of the Serbian People of Bosnia and Herzegovina adopted a declaration on the Proclamation of the Serbian Republic of Bosnia and Herzegovina. The territory of that republic was declared to include "the territories of the Serbian Autonomous Regions and Districts and of other Serbian ethnic entities in Bosnia and Herzegovina, including the regions in which the Serbian people remained in the minority due to the genocide conducted against it in World War Two", and it was declared to be a part of the federal Yugoslav state. On 12 August 1992, the name of the Bosnian Serb Republic was changed to Republika Srpska.

**38.** From 29 February to 2 March 1992, Bosnia and Herzegovina held a referendum on independence. At the urging of the SDS, the majority of Bosnian Serbs boycotted the vote. The referendum resulted in a pro-independence majority.

**39.** On 27 March 1992, the Serbian Republic of Bosnia and Herzegovina was formally proclaimed in Pale.

**40.** From March 1992 onwards, Serb regular and irregular forces seized control of territories within Bosnia and Herzegovina, including those specified in this indictment.

41. On 6 April 1992, the United States and the European Community formally recognized the independence of Bosnia and Herzegovina.

42. On 27 April 1992, Serbia and Montenegro proclaimed a new Federal Republic of Yugoslavia and declared it the successor state of the Socialist Federal Republic of Yugoslavia.

43. On 15 May 1992, the United Nations Security Council, in its resolution number 752, demanded that all interference from outside Bosnia and Herzegovina by units of the JNA as well as elements of the Croatian Army ("HV") cease immediately and that those units either be withdrawn, be subjected to the authority of the Government of the Republic, or be disbanded and disarmed.

44. **Vojislav ŠEŠELJ** visited Bosnia and Herzegovina before and during the period of the armed conflict to boost the morale of the participants. In October 1991, he visited Serb soldiers in Trebinje gathered in preparation for the attack on Dubrovnik. In May and August 1992, he visited Gacko and Zvornik, respectively. In May 1993, he gave a speech in Banja Luka.

45. In September 1993 **Vojislav ŠEŠELJ** had a conflict with Slobodan MILOŠEVIĆ during which he challenged MILOŠEVIĆ's leadership and called for a vote of "no confidence" in the government of Serbia. Between October and November 1993, dozens of **Vojislav ŠEŠELJ's** Chetnik volunteers were arrested in Serbia and charged with war crimes and other offences.

46. **Vojislav ŠEŠELJ** visited Serbia and Montenegro before and during the period of the armed conflict to boost the morale of the participants. In October 1991, he visited Serb soldiers in Trebinje gathered in preparation for the attack on Dubrovnik. In May and August 1992, he visited Gacko and Zvornik, respectively. In May 1993, he gave a speech in Banja Luka.

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49. In September 1993 **Vojislav ŠEŠELJ** had a conflict with Slobodan MILOŠEVIĆ during which he challenged MILOŠEVIĆ's leadership and called for a vote of "no confidence" in the government of Serbia. Between October and November 1993, dozens of **Vojislav ŠEŠELJ's** Chetnik volunteers were arrested in Serbia and charged with war crimes and other offences.

## **ANNEX II**

## ANNEX II

## VICTIMS FROM VOĆIN, HUM, BOKANE AND KRASKOVIĆ

## PARAGRAPH 19

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
December 1991	VOĆIN	ŠIMIĆ, Jaga MATANČI, Marija PERŠIĆ, Franca MEDIĆ, Branko MATANČI, Stjepan JURMANOVIĆ, Stjepan ŠTIMAC, Jakob ŠTIMAC, Angelina BULJEVAC, Ante TOMOLA, Rozalija PERŠIĆ, Alojzije VOLF, Dragutin IVANKOVIĆ, Marica MATANČI, Franjo MATANČI, Marija MEDVED, Mirko DORIĆ, Paulina ŠIMIĆ, Julka PAJTL, Josip ŠIMIĆ, Ivan ŠIMIĆ, Marija AMENT, Veronika ŠTIMAC, Stjepan BAČIĆ, Mirjana MAJDANČIĆ, Marija MAJIĆ, Stipan MAJIĆ, Ana BON, Ivica SALAĆ, Goran SUPAN, Vlado IVANKOVIĆ, Drago	1929/FEMALE 1939/FEMALE 1928/FEMALE 1959/MALE 1932/MALE 1933/MALE 1911/MALE 1915/FEMALE 1907/MALE 1921/FEMALE 1922/MALE 1922/MALE 1930/MALE 1926/MALE 1927/FEMALE 1929/MALE 1911/FEMALE 1932/FEMALE 1965/MALE 1932/MALE 1934/FEMALE 1914/FEMALE 1959/MALE 1963/FEMALE 1919/FEMALE 1909/MALE 1918/FEMALE 1954/MALE 1972/MALE 1959/MALE 1960/MALE

Plus one unidentified Deceased

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
December 1991	HUM	VUKOVIĆ, Marko DUZEL, Marijan RIDL, Roman BANOVAC, Ivo	1934/MALE 1931/MALE 1932/MALE 1934/MALE
December 1991	BOKANE	NENADOVIĆ, Stojan MARTINKOVIĆ, Tomislav MARTINKOVIC, Katica	1914/MALE 1939/MALE 1936/FEMALE
December 1991	KRASKOVIC	KOVAC, Zlatko KOVAC, Duro KOVAC, Ana KOVAC, Pista	1966/MALE 1922/MALE 1927/FEMALE 1953/MALE



### ANNEX III

#### ANNEX III

## ANNEX III.

**VICTIMS FROM OVČARA FARM (VUKOVAR HOSPITAL)**  
**PARAGRAPH 20**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVČARA	ADŽAGA, Jozo ANDRIJANIĆ, Vinko ANIĆ-ANTIĆ, Jadranko ARNOLD, Krešimir ASADANIN, Ilija BABIĆ, Dražen BAINRAUCH, Ivan BAJNRAUH, Tomislav BAKETA, Goran BALAŠ, Stjepan BALOG, Dragutin BALOG, Josip BALOG, Zvonimir BALVANAC, Đuro BANOŽIĆ, Boris BARANJAJI, Pero BARBARIĆ, Branko BARBIR, Lovro BARIČEVIĆ, Željko BARIŠIĆ, Franjo BARTA, Anđelko BATARELO, Josip BATARELO, Željko BAUMGERTNER, Tomislav BEGČEVIĆ, Marko BEGOV, Željko BINGULA, Stjepan BJELANOVIĆ, Ringo BLAŠKOVIĆ, Miroslav BLAŽEVIĆ, Zlatko BODROŽIĆ, Ante BOSAK, Marko BOSANAC, Dragutin BOSANAC, Tomislav BOŠNIAKOV, Josip	1949/MALE 1953/MALE 1959/MALE 1958/MALE 1952/MALE 1966/MALE 1956/MALE 1938/MALE 1960/MALE 1956/MALE 1974/MALE 1928/MALE 1958/MALE 1952/MALE 1967/MALE 1968/MALE 1967/MALE 1935/MALE 1965/MALE 1946/MALE 1967/MALE 1947/MALE 1955/MALE 1972/MALE 1968/MALE 1958/MALE 1958/MALE 1970/MALE 1959/MALE 1964/MALE 1953/MALE 1967/MALE 1919/MALE 1941/MALE 1960/MALE

## ANNEX III.

**VICTIMS FROM OVČARA FARM (VUKOVAR HOSPITAL)**  
**(Continuation)**  
**PARAGRAPH 20**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVČARA	BOŽAK, Ivan BRAČIĆ, Zvonimir BRADARIĆ, Josip BRAJDIĆ, Josip BUOVAC, Ivan BUŽIĆ, Zvonko CRNJAC, Ivan ČALETA, Zvonimir ČOLAK, Ivica ČUPIĆ, Mladen DALIĆ, Tihomir DOLIŠNI, Ivica DOŠEN, Ivan DOŠEN, Martin DOŠEN, Tadija DRAGUN, Josip DUVNJAK, Stanko DUĐAR, Saša DUKIĆ, Vladimir EBNER, Vinko-Đuro FIRI, Ivan FITUŠ, Karlo FRIŠČIĆ, Dragutin FURUNDŽIJA, Petar GAJDA, Robert GALIĆ, Milenko GALIĆ, Vedran GARVANOVIĆ, Borislav GAŠPAR, Zorislav GAVRIĆ, Dragan GLAVAŠEVIĆ, Siniša GOJANI, Jozo GOLAC, Krunoslav GRAE, Branislav GRANIĆ, Dragan	1958/MALE 1970/MALE 1949/MALE 1950/MALE 1966/MALE 1955/MALE 1966/MALE 1953/MALE 1965/MALE 1967/MALE 1966/MALE 1960/MALE 1958/MALE 1952/MALE 1950/MALE 1962/MALE 1959/MALE 1968/MALE 1948/MALE 1961/MALE 1915/MALE 1964/MALE 1958/MALE 1949/MALE 1966/MALE 1965/MALE 1973/MALE 1954/MALE 1971/MALE 1956/MALE 1960/MALE 1966/MALE 1959/MALE 1955/MALE 1960/MALE

## ANNEX III.

**VICTIMS FROM OVČARA FARM (VUKOVAR HOSPITAL)**  
**(Continuation)**  
**PARAGRAPH 20**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVČARA	GREJZA, Milan GRUBER, Zoran GUDELJ, Drago HEGEDUŠIĆ, Tomislav HEGEDUŠIĆ, Mario HERCEG, Željko HERMAN, Ivan HERMAN, Stjepan HLEVNJAK, Nedeljko HOLJEVAC, Nikica HORVAT, Ivica HORVAT, Viktor HUSNJAK, Nedjeljko ILEŠ, Zvonko IMBRIŠIĆ, Ivica IVAN, Zlatko IVEZIĆ, Aleksander JAJALO, Marko JAKUBOVSKI, Martin JALŠOVEC, Ljubomir JAMBOR, Tomo JANIĆ, Mihael JANJIĆ, Borislav JANTOL, Boris JARABEK, Zlatko JEZIDŽIĆ, Ivica JOVAN, Zvonimir JOVANOVIĆ, Branko JOVANOVIĆ, Oliver JULARIĆ, Goran JURELA, Damir JURELA, Željko JURENDIĆ, Drago JURIŠIĆ, Marko JURIŠIĆ, Pavao JURIŠIĆ, Željko	1959/MALE 1969/MALE 1940/MALE 1953/MALE 1972/MALE 1962/MALE 1969/MALE 1955/MALE 1964/MALE 1955/MALE 1958/MALE 1949/MALE 1969/MALE 1941/MALE 1957/MALE 1955/MALE 1950/MALE 1957/MALE 1971/MALE 1957/MALE 1966/MALE 1939/MALE 1956/MALE 1959/MALE 1956/MALE 1957/MALE 1967/MALE 1955/MALE 1972/MALE 1971/MALE 1969/MALE 1956/MALE 1966/MALE 1946/MALE 1966/MALE 1963/MALE

## ANNEX III.

**VICTIMS FROM OVČARA FARM (VUKOVAR HOSPITAL)**  
**(Continuation)**  
**PARAGRAPH 20**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVČARA	KAČIĆ, Igor KAPUSTIĆ, Josip KELAVA, Krešimir KIRALJ, Damir KIRALJ, Damir KITIĆ, Goran KNEŽIĆ, Đuro KOLAK, Tomislav KOLAK, Vladimir KOLOGRANIĆ, Duško KOMORSKI, Ivan KOSTENAC, Bono KOSTOVIĆ, Borislav KOŠIR, Božidar KOVAČ, Ivan KOVAČ, Mladen KOVAČEVIĆ, Zoran KOVAČIĆ, Damir KOŽUL, Josip KRAJINOVIĆ, Ivan KRAJINOVIĆ, Zlatko KRASIĆ, Ivan KREZO, Ivica KRISTIČEVIĆ, Kazimir KRIŽAN, Drago KRUNEŠ, Branimir LENDEL, Tomislav LENDEL, Zlatko LEROTIĆ, Zvonimir LESIĆ, Tomislav LET, Mihajlo LILI, Dragutin LJUBAS, Hrvoje LONČAR, Tihomir LOVRIĆ, Joko LOVRIĆ, Jozo LUCIĆ, Marko LUKENDA, Branko LUKIĆ, Mato	1975/MALE 1965/MALE 1953/MALE 1964/MALE 1959/MALE 1966/MALE 1937/MALE 1962/MALE 1966/MALE 1950/MALE 1952/MALE 1942/MALE 1962/MALE 1957/MALE 1953/MALE 1958/MALE 1962/MALE 1970/MALE 1968/MALE 1966/MALE 1969/MALE 1964/MALE 1963/MALE 1959/MALE 1957/MALE 1966/MALE 1957/MALE 1949/MALE 1960/MALE 1950/MALE 1956/MALE 1951/MALE 1971/MALE 1955/MALE 1968/MALE 1953/MALE 1954/MALE 1961/MALE 1963/MALE

**ANNEX III.**  
**VICTIMS FROM OVČARA FARM (VUKOVAR HOSPITAL)**  
**(Continuation)**  
**PARAGRAPH 20**

<b>DATE</b>	<b>LOCATION</b>	<b>VICTIMS</b>	<b>YEAR OF BIRTH / SEX</b>
20 November 1991	OVČARA	MAGDIĆ, Mile MAGOČ, Predrag MAJIĆ, Robert MAJOR, Željko MANDIĆ, Marko MARIČIĆ, Zdenko MARIJANOVIĆ, Martin MAŽAR, Ivan MEDEŠI, Andrija MEDEŠI, Zoran MERIĆ, Ožren MIHOVIĆ, Tomislav MIKLETIĆ, Josip MIKULIĆ, Zdravko MIKULIĆ, Zvonko MILIĆ, Slavko MILJAK, Zvonimir MIŠIĆ, Ivan MLINARIĆ, Mile MOKOŠ, Andrija MOLNAR, Aleksandar MUTVAR, Antun NAĐ, Darko NAĐ, Franjo NEJAŠMIĆ, Ivan NICOLLIER, Jean Michael OMEROVIĆ, Mersad OREŠKI, Ivan PAPP, Tomislav PATARIĆ, Željko PAVLIĆ, Slobodan PAVLOVIĆ, Zlatko PERAK, Mato PERKO, Aleksandar PERKOVIĆ, Damir PERKOVIĆ, Josip PETROVIĆ, Stjepan	1953/MALE 1965/MALE 1971/MALE 1960/MALE 1953/MALE 1956/MALE 1959/MALE 1934/MALE 1936/MALE 1940/MALE 1956/MALE 1952/MALE 1952/MALE 1961/MALE 1969/MALE 1955/MALE 1950/MALE 1968/MALE 1966/MALE 1955/MALE 1965/MALE 1969/MALE 1965/MALE 1935/MALE 1958/MALE 1966/MALE 1970/MALE 1950/MALE 1963/MALE 1959/MALE 1965/MALE 1963/MALE 1961/MALE 1967/MALE 1965/MALE 1963/MALE 1949/MALE

**ANNEX III.**  
**VICTIMS FROM OVČARA FARM (VUKOVAR HOSPITAL)**  
**(Continuation)**  
**PARAGRAPH 20**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVČARA	PINTER, Nikola PLAVŠIĆ, Ivan POLHERT, Damir POLOVINA, Branimir POSAVEC, Stanko POTHORSKI, Janja PRAVDIĆ, Tomo PRPIĆ, Tomislav PUCAR, Dmtar RAGUŽ, Ivan RAŠIĆ, Milan RATKOVIĆ, Krešimir RIBIČIĆ, Marko RIMAC, Salvador ROHAČEK, Karlo ROHAČEK, Željko SATTI, Čeman SAMARDŽIĆ, Damjan SAVANOVIĆ, Tihomir SENČIĆ, Ivan SOTINAC, Stipan SPUDIĆ, Pavao STANIĆ, Marko STANIĆ, Željko STEFANKO, Petar STOJANOVIĆ, Ivan STUBIČAR, Ljubomir ŠAJTOVIĆ, Davor ŠAJTOVIĆ, Martin ŠARIK, Stjepan ŠAŠKIN, Sead ŠINDILJ, Vjekoslav ŠRENK, Đuro ŠTEFULJ, Dražen TABAČEK, Antun TADIĆ, Tadija TARLE, Dujo TEREK, Antun TIŠLJARIĆ, Darko TIVANOVAC, Ivica	1940/MALE 1939/MALE 1962/MALE 1950/MALE 1952/MALE 1931/FEMALE 1934/MALE 1959/MALE 1949/MALE 1955/MALE 1954/MALE 1968/MALE 1951/MALE 1960/MALE 1942/MALE 1971/MALE 1960/MALE 1946/MALE 1964/MALE 1964/MALE 1939/MALE 1965/MALE 1958/MALE 1968/MALE 1942/MALE 1949/MALE 1954/MALE 1961/MALE 1914/MALE 1955/MALE 1960/MALE 1971/MALE 1943/MALE 1963/MALE 1958/MALE 1959/MALE 1950/MALE 1940/MALE 1971/MALE 1963/MALE

## ANNEX III.

**VICTIMS FROM OVČARA FARM (VUKOVAR HOSPITAL)**  
**(Continuation)**  
**PARAGRAPH 20**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVČARA	TOMAŠIĆ, Tihomir TORDINAC, Željko TOT, Tomislav TRALJIĆ, Tihomir TURK, Miroslav TURK, Petar TUSTONJIĆ, Dane TUŠKAN, Dražen UŠAK, Branko VAGENHOFER, Mirko VARENICA, Zvonko VEBER, Siniša VIDOŠ, Goran VILENICA, Žarko VIRGES, Antun VLAHO, Mate VLAHO, Miroslav VOLODER, Zlatan VON BASINGGER, Harllan VUJEVIĆ, Zlatko VUKOJEVIĆ, Slaven VUKOVIĆ, Rudolf VUKOVIĆ, Vladimir VUKOVIĆ, Zdravko VULIĆ, Ivan VULIĆ, Vid VULIĆ, Zvonko ZERA, Mihajlo ZELJKO, Josip ŽERAVICA, Dominik ŽIVKOVIĆ, Damir ŽIVKOVIĆ, Goran ŽUGEĆ, Borislav	1963/MALE 1961/MALE 1967/MALE 1967/MALE 1950/MALE 1947/MALE 1959/MALE 1966/MALE 1958/MALE 1937/MALE 1957/MALE 1969/MALE 1960/MALE 1969/MALE 1953/MALE 1959/MALE 1967/MALE 1960/MALE 1971/MALE 1951/MALE 1970/MALE 1961/MALE 1957/MALE 1967/MALE 1946/MALE 1941/MALE 1971/MALE 1955/MALE 1953/MALE 1959/MALE 1970/MALE 1960/MALE 1963/MALE



## ANNEX IV

ANNEX IV

ANNEX IV

## ANNEX IV

## VICTIMS FROM VELEPROMET FACILITY, VUKOVAR

## PARAGRAPH 21

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
November 1991	Velepromet Facility, Vukovar	CRK, Antun GOLAC, Veljko MATOUŠEK, Ivan MIHALJEVIĆ, Nikola SLUGANOVIĆ, Petar VLADISAVLJEVIĆ, Deno	1942/MALE 1959/MALE 1958/MALE 1950/MALE 1938/MALE 1971/MALE

## PARAGRAPH 22

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
November 1991	Velepromet Facility, Vukovar	CRK, Antun GOLAC, Veljko MATOUŠEK, Ivan MIHALJEVIĆ, Nikola SLUGANOVIĆ, Petar VLADISAVLJEVIĆ, Deno	1942/MALE 1959/MALE 1958/MALE 1950/MALE 1938/MALE 1971/MALE

## PARAGRAPH 23

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
November 1991	Velepromet Facility, Vukovar	CRK, Antun GOLAC, Veljko MATOUŠEK, Ivan MIHALJEVIĆ, Nikola SLUGANOVIĆ, Petar VLADISAVLJEVIĆ, Deno	1942/MALE 1959/MALE 1958/MALE 1950/MALE 1938/MALE 1971/MALE

**ANNEX V**

ANNEX V

## ANNEX V

**VICTIMS FROM ČELOPEK DOM KULTURE, ZVORNIK  
PARAGRAPH 22**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH
1 June - 26 June 1992	ČELOPEK DOM KULTURE	HADŽIĆ, Izet ATLIĆ, Alija SALIHović, Husein ZAHIROVIĆ, Salih HALILOVIĆ, Hasan ĐIHIĆ, Sead PEZEROVIĆ, Zaim BIKIĆ, Šaban ATLIĆ, Hasan OKANOVIĆ, Omer ALIHODIĆ, Benjamin ALIHODIĆ, Ahmet PEZEROVIĆ, Senaid ATLIĆ, Abdulah	1936 1938 1950 1946 1954 1960 1959 1957 1952 1936 1969 1965 1957 -

**VICTIMS FROM KARAKAJ TECHNICAL SCHOOL, ZVORNIK  
PARAGRAPH 22**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH
Between 1 and 5 June 1992	KARAKAJ TECHNICAL SCHOOL	SINANović, Ramiz JAŠAREVIĆ, Nuriya JAŠAREVIĆ, Avdo	1956 1961 1950

**VICTIMS FROM GERO'S SLAUGHTER-HOUSE, ZVORNIK  
PARAGRAPH 22**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH
Between 7 and 9 June 1992	GERO'S SLAUGHTER-HOUSE	HASANOVIĆ, Sejdo HASANOVIĆ, Muradif	1956 1957

**VICTIM FROM "CIGLANA" FACTORY, ZVORNIK,  
PARAGRAPH 22**

<b>DATE</b>	<b>LOCATION</b>	<b>VICTIM</b>	<b>HOME</b>
During June or July 1992	CIGLANA FACTORY	ČIRAK, ISMET	Village of Grbovci or Grbavaca.

**VICTIMS FROM DRINJAČA DOM KULTURE, ZVORNIK  
PARAGRAPH 22**

[illegible]

	Vehid BARUČIĆ	-/MALE
	Zulfo BARUČIĆ	-/MALE
	Osman BEČIĆ	-/MALE
	Džemal BEGANOVIĆ	-/MALE
	Esed BEGANOVIĆ	-/MALE
	Mehmed BEGANOVIĆ	-/MALE
	Mustafa BEGANOVIĆ	-/MALE
	Nezir BEGANOVIĆ	-/MALE
	Smajo BEGANOVIĆ	-/MALE
	Redžo BJELIĆ	-/MALE
	Aljo ČOHODAREVIĆ	-/MALE
	Beriz DAUTOVIĆ	-/MALE
	Esad DAUTOVIĆ	-/MALE
	Hasan DAUTOVIĆ	-/MALE
	Husein DAUTOVIĆ	-/MALE
	Huso DAUTOVIĆ	-/MALE
	Idriz DAUTOVIĆ	-/MALE
	Mirsad DAUTOVIĆ	-/MALE
	Mirzet DAUTOVIĆ	-/MALE
	Nezir DAUTOVIĆ	-/MALE
	Omer DAUTOVIĆ	-/MALE
	Ragib DAUTOVIĆ	-/MALE
	Ramo DAUTOVIĆ	-/MALE
	Mevludin FEJZIĆ	-/MALE
	Nuko FEJZIĆ	-/MALE
	Muriz HUSEINOVIĆ	-/MALE
	Velid HUSEINOVIĆ	-/MALE
	Ahmet IBRALIĆ	-/MALE
	Amil IBRALIĆ	-/MALE
	Nezir IBRALIĆ	-/MALE
	Mustafa KARIĆ	-/MALE
	Haso MEMIŠEVIĆ	-/MALE
	Ramiz MEMIŠEVIĆ	-/MALE
	Ramo MEMIŠEVIĆ	-/MALE
	Senaid MEMIŠEVIĆ	-/MALE
	Zaim MEMIŠEVIĆ	-/MALE
	Azem MURATOVIĆ	-/MALE
	Bajro MURATOVIĆ	-/MALE
	Mehmed MURATOVIĆ	-/MALE
	Hasib MUSTAFIĆ	-/MALE
	Juso MUSTAFIĆ	-/MALE
	Salko MUSTAFIĆ	-/MALE
	Šaban OSMANOVIĆ	-/MALE
	Šabanija OSMANOVIĆ	-/MALE

		Demail OSMANOVIĆ	-/MALE
		Bajro OSMANOVIĆ	-/MALE
		Juso OSMANOVIĆ	-/MALE
		Mehmedalija OSMANOVIĆ	-/MALE
		Meho OSMANOVIĆ	-/MALE
		Mejo OSMANOVIĆ	-/MALE
		Muhamed OSMANOVIĆ	-/MALE
		Muhamed OSMANOVIĆ	-/MALE
		Mujo OSMANOVIĆ	-/MALE
		Mujo OSMANOVIĆ	-/MALE
		Ramo OSMANOVIĆ	-/MALE
		Redžo OSMANOVIĆ	-/MALE
		Sefer OSMANOVIĆ	-/MALE
		Smajo OSMANOVIĆ	-/MALE
		Mujo ŠABANOVIĆ	-/MALE

**ANNEX VI**

ANNEX VI

ANNEX VI



## ANNEX VI

**VICTIMS FROM  
AGRICULTURAL CO-OPERATIVE IN  
CRKVINA, MUNICIPALITY OF BOSANSKI ŠAMAC**

**PARAGRAPH 23**

<b>DATE</b>	<b>LOCATION</b>	<b>VICTIMS</b>	<b>SEX</b>
May 1992	Crkvina	AGATIĆ, Ivan ANTUNIĆ, Jozo BARTOLIĆ, Ivan BLAZANOVIĆ, Luka BRANDIĆ, Niko(l) GREGUREVIĆ, Luka HODZIĆ, Ruzmir ("Suma") HODZIĆ, Suad HURTIĆ, Sead ("Batan") LNU, Ermin LNU, Hilmo LNU, Ivica MANDIĆ, Franjo MATIĆ, Ilija MIJIĆ, Ivo ORSOLIĆ, Josip TUZLAK, Ivo Unidentified Boy	MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE MALE

## ANNEX VII

ANNEX VII

## ANNEX VII

## VICTIMS FROM "GREATER SARAJEVO"

## PARAGRAPH 24

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
June 1992.	LJEŠEVO	FAZLIĆ, Suljo FAZLIĆ, Munira FAZLIĆ, Hasan FAZLIĆ, Arif FAZLIĆ, Safet FAZLIĆ, Ibrahim FAZLIĆ, Huso FAZLIĆ, Amir MASNOPITA, Munir MASNOPITA, Fadil MASNOPITA, Mehmed MASNOPITA, Husnija MASNOPITA, Mujo MASNOPITA, Jasmin MASNOPITA, Mensur SULJIĆ, Zubejda NUHIĆ, Nijaz AVDUKIĆ, Ćamil AVDUKIĆ, Izet KARAVDIĆ, Asim OMANOVIĆ, Arif FAZLIĆ, Meho	1933/MALE 1936/FEMALE 1945/MALE 1958/MALE 1963/MALE 1948/MALE 1928/MALE 1964/MALE 1945/MALE 1933/MALE 1940/MALE 1921/FEMALE 1951/MALE 1955/MALE 1947/MALE 1930/FEMALE 1961/MALE 1935/MALE 1963/MALE 1936/MALE 1949/MALE 1923/MALE

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
Summer, 1993	ŽUČ	TIRIĆ, Avdo	UNKNOWN/MALE
Summer, 1993	ŽUČ	SKENDO, Nermin	UNKNOWN/MALE

## ANNEX VIII

## ANNEX VIII

## VICTIMS FROM BIJELJINA

## PARAGRAPH 25

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
31 March 1992	BIJELJINA	ŠABANOVIĆ, Redžep ŠABANOVIĆ, Admir ŠABANOVIĆ, Tifa KOMŠIĆ, Mustafa KOMŠIĆ, Adnan KOMŠIĆ, Rijad	-/MALE -/MALE -/FEMALE -/MALE -/MALE -/MALE

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
April 1992. – September 1993.	BATKOVIĆ CAMP	BULČEVIĆ, Smail ČAUŠEVIĆ, Muhamed ČUDIĆ, Edhem ČURTIĆ, Husejin DELIĆ, Sead DŽIHIC, Suad HADŽIOMEROVIĆ, Zulfo JUKIĆ, Rasim KAVAZBAŠIĆ, Alija MEMIĆ, Džemal MUJIĆ, Salko MUMINOVIĆ, Fahrudin PAŠIĆ, Ahmet REDŽEPOVIĆ, Nurudin ŠMAJIĆ, Ejub TOPČIĆ, Idriz ZEČEVIĆ, Ferid	1922/MALE -/MALE -/MALE -/MALE -/MALE -/MALE -/MALE 1917/MALE -/MALE -/MALE 1930/MALE -/MALE -/MALE -/MALE -/MALE -/MALE 1937/MALE

## ANNEX IX

## ANNEX IX

## VICTIMS FROM MOSTAR

## PARAGRAPH 26

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
June 1992.	UBORAK	ĆORIĆ, Bajro BENCA, Nedžad SMAJIĆ, Hajdo OSMANOVIĆ, Enver DELAGIĆ, Admir KELECIJA, Salko ŠAKRAK, Ferid ALIĆ, Meho KOŠPO, Asim NUHIĆ, Mujo MEZET, Enes ĆORIĆ, Himzo KANIŽA, Jusuf MRKONJIĆ, Šemsudin SALČIN, Nedžad ZADRO, Petar RAHIMIĆ, Meho KORDIĆ, Ljubo MANJURA, Mehmed JAZVIN, Salih SINANOVIĆ, Bego SALČIN, Osman MIHALJ, Stjepan MIHALJ, Marko PEHILJ, Mujo JURIĆ, Jelka HASIĆ, Omer SALČIN, Enver JURČIĆ, Krešimir ĆORIĆ, Smajo SIMIDŽIJA, Muhamed JURIĆ, Danica POLČIĆ, Bećir ŠKEGRO, Sofija	1956/MALE 1970/MALE 1938/MALE 1955/MALE 1970/MALE 1953/MALE 1954/MALE 1962/MALE 1934/MALE 1931/MALE 1960/MALE 1958/MALE 1928/MALE 1947/MALE 1953/MALE 1916/MALE 19/MALE 1921/MALE 1938/MALE 1924/MALE 1943/MALE 1922/MALE 1925/MALE 1929/MALE 1945/MALE 1940/FEMALE 1953/MALE 1947/MALE 1930/MALE 1930/MALE 1955/MALE 1949/FEMALE 1941/MALE 1940/FEMALE

	ČULJAK, Štefa	1932/FEMALE
	OMANOVIĆ, Alija	1928/MALE
	JAPALAK, Salko	1927/MALE
	DELALIĆ, Fadil	1936/MALE
	BUBALO, Husein	1936/MALE
	ZUKIĆ, Mehmed	1938/MALE
	HADŽIHAJRIĆ, Hamdija	1937/MALE
	RAHIMIĆ, Semir	1953/MALE
	TURKIĆ, Salko	1934/MALE
	DUŽEVIĆ, Mile	1926/MALE
	BLAŽEVIĆ, Stjepan	1944/MALE
	HAJRIZAJ, Bajram	1940/MALE
	MIKULIĆ, Dragica	1938/FEMALE
	KELECIJA, Ibro	1932/MALE
	PUCE, Mustafa	1961/MALE
	DUMPOR, Omer	1958/MALE
	MARIĆ, Ramo	1966/MALE
	PRSKALO, Ivan	1936/MALE
	HASIĆ, Tidža	1957/FEMALE
	PUZIĆ, Sead	1949/MALE
	KOKOTOVIĆ, Željko	1968/MALE
	KLEPO, Ferid	1949/MALE
	ČARAPINA, Petar	1926/MALE
	KUKO, Ibro	1956/MALE
	BUŠIĆ, Stipe	1948/MALE
	JAPALAK, Ibrahim	1939/MALE
	OMANOVIĆ, Bajro	1945/MALE
	BREKALO, Hava	1914/FEMALE
	KUKO, Ramo	1930/MALE
	GUBELJIĆ, Zaim	1933/MALE
	KORDIĆ, Mara	1923/FEMALE
	KARABEG, Salih	1943/MALE
	ALIBEGOVIĆ, Džafer	1941/MALE
	KASALO, Hasan	1929/MALE
	KASALO, Aid	1961/MALE
	KASALO, Adis	1963/MALE
	SLIPIČEVIĆ, Esad	1950/MALE
	ŠESTIĆ, Miralem	1952/MALE
	JURIĆ, Mario	1968/MALE
	JUKLO, Mirzo	1965/MALE
	JUKLO, Enes	1968/MALE
	JUKLO, Jasmin	1975/MALE
	ISIĆ, Safet	1953/MALE
	KREMO, Husein	1925/MALE



		SEFIĆ, Edin SEFIĆ, Saša DELIC, Fuad	1952/MALE 1976/MALE 1946/MALE
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DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
June 1992.	SUTINA	BESLIMAJ, Beslim BOŠKOVIĆ, Dane ČATIĆ, Mirsad JERKIĆ, Vice KOVAČEVIĆ, Zurahid KUKO, Senad MANDURIĆ, Ljubo MILETIĆ, Ilija ROŽIĆ, Ante ROŽIĆ, Petar REDŽEP, Ivan SELAJ, Ekrem SIMIDŽIJA, Murat SUNJIĆ, Ivan	1940/MALE 1941/MALE 1950/MALE 1937/MALE 1948/MALE 1956/MALE 1936/MALE 1945/MALE 1935/MALE 1918/MALE 52 years old/MALE 1949/MALE 1952/MALE -/MALE

**ANNEX X**

**ANNEX X**

## ANNEX X

## VICTIMS FROM NEVESINJE

## PARAGRAPH 27

DATE	LOCATION OF KILLINGS	VICTIMS	YEAR OF BIRTH/SEX
June 1992.	LIPOVAČA	ALIBAŠIĆ, Emina	1965/FEMALE
		ALIBAŠIĆ, Senada	1968/FEMALE
		ALIBAŠIĆ, Habiba	1939/FEMALE
		ALIČIĆ, Saja	1968/FEMALE
		ALIČIĆ, Fadila	1960/FEMALE
		ALIČIĆ, Nefa	1927/FEMALE
		ALIČIĆ, Mejra	1958/FEMALE
		ALIČIĆ, Habiba	1953/FEMALE
		ALIČIĆ, Mejra	1956/FEMALE
		ALIČIĆ, Husein	1984/MALE
		ALIČIĆ, Merima	1987/FEMALE
		ALIČIĆ, Nazika	1981/FEMALE
		ALIČIĆ, Lejla	1985/FEMALE
		ALIČIĆ, Saudin	1987/MALE
		BRAJEVIĆ, Đulsa	1935/FEMALE
		KASUNOVIĆ, Tida	1924/FEMALE
		MAHINIĆ, Lejla	1985/FEMALE
		MAHINIĆ, Omer	1982/MALE
		MAHINIĆ, Ibrahim	1980/MALE
		MAHINIĆ, Ajla	1991/FEMALE
		MAHINIĆ, Hava	1923/FEMALE
		MAHINIĆ, Munira	1956/FEMALE
		MAHINIĆ, Fata	1922/FEMALE
		MAHINIĆ, Fehma	1934/FEMALE
		OMERIKA, Hasinija	1950/FEMALE
		OMERIKA, Amina	1990/FEMALE
		PLOSKIĆ, Agan	1991/MALE
		PLOSKIĆ, Samra	1988/FEMALE
		PLOSKIĆ, Amra	1986/FEMALE
		PLOSKIĆ, Ajla	1991/FEMALE
		PLOSKIĆ, Amar	1987/MALE
		PLOSKIĆ, Hajra	1964/FEMALE
		PLOSKIĆ, Mejra	1936/FEMALE
		PLOSKIĆ, Emin	1991/MALE
		PLOSKIĆ, Šehija	1961/FEMALE

		ŠIPKOVIĆ, Ferida ŠIPKOVIĆ, Nura ŠIPKOVIĆ, Huso ŠIPKOVIĆ, new-born ČOPELJ, Zejna ČOPELJ, Alka ČOPELJ, Nermina	1965/FEMALE 1938/FEMALE 1988/MALE 1992/ 1930/FEMALE 1937/FEMALE 1968/FEMALE
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DATE	LOCATION OF KILLINGS	VICTIMS	YEAR OF BIRTH/SEX
June 1992.	BORAŠNICA MOUNTAIN	DEMIĆ, Salko DEMIĆ, Alija DEMIĆ, Osman KAJAN, Omer GOLOŠ, Halil HRNJIČIĆ, Ahmet KAJAN, Ibro DEMIĆ, Emina DEMIĆ, Mejra DEMIĆ, Emina DEMIĆ, Emina DEMIĆ, Ramiza GOLOŠ, Huriya KAJAN, Hana KAJAN, Merka NURKOVIĆ, Alka KAJAN, Zejna HRNJIČIĆ, Zineta DEMIĆ, Haska	1929/MALE 1921/MALE 1929/MALE 1935/MALE 1935/MALE 81 years old/MALE 55-60 years old/MALE 1924/FEMALE 1921/FEMALE 1935/FEMALE 1925/FEMALE 40 years old/FEMALE 80 years old/FEMALE 55 years old/FEMALE 50 years old/FEMALE 80 years old/FEMALE 80 years old/FEMALE 80 years old/FEMALE 1928/FEMALE

DATE	LOCATION OF BODIES	VICTIMS	YEAR OF BIRTH/SEX
June 1992.	TELEĆA LASTVA	ALIBAŠIĆ, Salih ALIBAŠIĆ, Mustafa ALIČIĆ, Halil ALIČIĆ, Alija ALIČIĆ, Mujo ALIČIĆ, Alija ALIČIĆ, Mehmed ALIČIĆ, Bećir	1975/MALE 1934/MALE 1956/MALE 1923/MALE 1929/MALE 1952/MALE 1975/MALE 1954/MALE

		BRAJEVIĆ, Alija BRAJEVIĆ, Kasim BRAJEVIĆ, Mustafa ČOPELJ, Šerif ČOPELJ, Mustafa ČOPELJ, Dervo ČOPELJ, Esad ČOPELJ, Ibrahim KASUNOVIĆ, Ibro KASUNOVIĆ, Čamil MAHINIĆ, Alija MAHINIĆ, Adem MAHINIĆ, Hajdar OMERIKA, Mujo PLOSKIĆ, Mustafa PLOSKIĆ, Hasan PLOSKIĆ, Huso PLOSKIĆ, Avdo ŠIPKOVIĆ, Asim ŠIPKOVIĆ, Habib ŠIPKOVIĆ, Hasan	1971/MALE 1963/MALE 1932/MALE 1959/MALE 1937/MALE 1927/MALE 1972/MALE 1970/MALE 1955/MALE 1953/MALE 1928/MALE 1955/MALE 1933/MALE 1931/MALE 1962/MALE 1958/MALE 1956/MALE 1937/MALE 1974/MALE 1962/MALE 1921/MALE
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DATE	LOCATION OF BODIES	VICTIMS	YEAR OF BIRTH/SEX
JUNE 1992.	ZIJEMLJE	BARALIJA, Hamid BRAJEVIĆ, Jusuf CATIĆ, Mujo CATIĆ, Ibro CATIĆ, Đulsa CATIĆ, Ema	UNKNOWN/MALE UNKNOWN/MALE UNKNOWN/MALE UNKNOWN/MALE UNKNOWN/MALE UNKNOWN/MALE