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

**Case No.: IT- 97- 25/1-PT**

**THE PROSECUTOR  
OF THE TRIBUNAL**

**AGAINST**

**MITAR RAŠEVIĆ  
SAVO TODOVIĆ**

**SECOND JOINT AMENDED INDICTMENT**

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

**MITAR RAŠEVIĆ  
SAVO TODOVIĆ**

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

**THE ACCUSED**

1. **MITAR RAŠEVIĆ**, son of Đorđe, was born on 15 November 1949, in the village of Čagušt in the municipality of Foča. He was a teacher of sociology and resided in Foča. Before, during and after the war, **MITAR RAŠEVIĆ** was the commander of the guards at the Foča Kazнено-Popravni Dom (KP Dom).
2. **SAVO TODOVIĆ**, son of Vladimir was born on 11 December 1952, in the village of Rijeka and is a permanent resident of Foča. He worked in the prison Foča Kazнено-Popravni Dom (KP Dom) from 4 January 1974 until at least October 1994. He was second in command of the KP Dom prison staff from 20 April 1992 until 9 August 1993. In the period from 10 August 1993 until 31 October 1994, he continued to be an Assistant Warden in KP Dom.

**INDIVIDUAL CRIMINAL RESPONSIBILITY**

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

3. **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** are individually criminally responsible for the crimes referred to in Articles 3 and 5 of the Statute of the Tribunal and described in this indictment. The Accused planned, instigated, ordered, committed or otherwise aided and abetted in the planning, preparation or execution of any acts or omissions set forth below. 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 prolonged and routine imprisonment and confinement (paragraph 19 (a), both Accused), establishment and perpetuation of inhumane conditions (paragraph 19 (b) both Accused), repeated torture and beatings of Muslim and other non-Serb detainees (paragraph 19 (c) in relation to the incidents described further in paragraphs 30 and 31, only the Accused Todović), prolonged and frequent forced labour (paragraph 19 (e) both Accused) and deportation and forcible transfer (paragraph 19 (f) both Accused); torture (Count 2) in relation to the incidents described in paragraphs 30 and 31 (only the Accused Todović); torture (Count 3) in relation to the incidents described in paragraphs 30 and 31 (only the Accused Todović); inhumane acts (Count 4) in relation to the incidents described in the paragraphs 30 and 31 (only the Accused Todović); cruel treatment (Count 5) in relation to the incidents described in paragraphs 30 and 31 (only the Accused Todović); imprisonment (Count 8) (both Accused); inhumane acts (Count 9) (both Accused); cruel treatment (Count 10) (both Accused); enslavement (Count 11) (both Accused); and slavery (Count 12) (both Accused). “Committing” in this indictment includes the Accused’s participation in a joint criminal enterprise as a co-perpetrator.
4. **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** participated in a joint criminal enterprise that came into existence no later than 18 April 1992 and continued until 31 October 1994. The purpose of the joint criminal enterprise was to imprison Muslim and other non-Serb civilians from Foča and the surrounding areas in inhumane conditions and subject them to beatings, torture, enslavement, deportations and forcible transfers. The methods and conduct of the joint criminal enterprise developed during the course of its existence. The enslavement of detainees described in paragraph 51 of the indictment started only in May 1992. The systematic killing of detainees described in paragraph 43 of the indictment took place only in the time period from June to August 1992.
5. The crimes enumerated in Counts 1 to 5 and 8 to 12 of this indictment were within the object of the joint criminal enterprise and **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** shared the intent either to perpetrate the particular crimes or to further a common concerted system of ill-treatment. Counts 6 and 7 were the natural and foreseeable consequence of the execution of the object of the joint criminal enterprise and the Accused was aware that such crimes were the possible outcome of the execution of the joint criminal enterprise.

6. Alternatively, the crimes enumerated in Counts 8 to 10 of this indictment were within the object of the joint criminal enterprise and **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** shared the intent either to perpetrate the particular crimes or to further a common concerted system of ill-treatment. Counts 1 to 7 and 11 to 12 were the natural and foreseeable consequences of the execution of the object of the joint criminal enterprise and the Accused was aware that such crimes were the possible outcome of the execution of the joint criminal enterprise.
7. A number of individuals participated in this joint criminal enterprise at different times during its existence. Each participant or co-perpetrator within the joint criminal enterprise played his role or roles that significantly contributed to the overall objective of the enterprise. Individuals participating in this joint criminal enterprise included Milorad Krnojelac, Slavko Koroman, Milenko Burilo, Risto Ivanović, Dragomir Obrenović, Zoran Matović, Milenko Elčić, Slobodan Pejić, Predrag Stevanović, Vlatko Pljevaljčić, Jovo Savić, Radovan Vuković, Milovan Vuković, Milvoj Milić and other unknown members of the prison staff, the Yugoslav People's Army ("JNA"), the Serb Territorial Defence ("TO"), the Republika Srpska ("RS") armed forces ("VRS"), the RS police forces, and Serb paramilitary formations.
8. **MITAR RAŠEVIĆ**, acting individually or in concert with other members of the joint criminal enterprise, participated in the joint criminal enterprise in the following ways:
  - (a) As commander of the KP Dom guards, **MITAR RAŠEVIĆ**'s primary duty was to supervise at least 37 prison guards. He exercised effective control over the KP Dom guards including preparing the guard duty schedule and work assignments.
  - (b) As part of the senior management of the KP Dom prison and in his capacity as the guards' commander, he was instrumental in establishing and maintaining the living conditions in the detention facility as specified in paragraphs 48 and 49 in the indictment. He communicated with external military and political authorities, especially with regard to prisoner exchanges.
  - (c) He was in charge of the solitary confinement cells and had the power to release detainees from isolation but, with few exceptions, did not do so.
  - (d) He participated in establishing a pattern of widespread mistreatment during the day-time, including torture and beatings as specified in paragraphs 32 to 39 in the indictment, whereby guards under his command selected detainees from their cells and took them to interrogation rooms in which they were subjected to severe mistreatment while being interrogated.
  - (e) He participated in establishing a pattern of widespread mistreatment during the evening as specified in paragraphs 34 to 39 in the indictment, whereby guards under his command selected detainees from their cells and took them to special rooms in the administration building in which they were subjected to assaults including beatings, torture and killings by prison guards and by both military and police staff from outside the prison.

- (f) He participated in establishing and maintaining a system of punishment as specified in paragraphs 27 to 31 in the indictment, in which guards beat the detainees even for minor violations of the prison rules and collective punishment was meted out for actions of individual detainees.
  - (g) He encouraged and gave legitimacy to the mistreatment of detainees by failing to prevent beatings and other inhumane acts that occurred in his presence.
  - (h) He contributed to a climate of fear at the KP Dom by threatening prisoners with serious bodily harm if they attempted to escape.
  - (i) He participated in the establishment of a system of forced labour as specified in paragraphs 51 to 56 in the indictment, by either personally selecting detainees for work and monitoring their assignments inside and outside the KP Dom or assigning guards to such tasking. To facilitate forced labour outside the KP Dom, he co-operated with military personnel, including the hand-over of detainees to them.
  - (j) He participated in the forcible transfer and deportation of detainees from the prison in so-called exchanges as specified in paragraph 19 (f) in the indictment, by selecting detainees from the KP Dom for transfer to locations outside of the Foča municipality, such as Montenegro and Serbia. He was involved in the disappearance of detainees whereby supposed prisoner exchanges were arranged, but after which these detainees were never seen alive again.
9. **SAVO TODOVIĆ**, acting individually or in concert with other members of the joint criminal enterprise, participated in the joint criminal enterprise in the following ways:
- (a) From 20 April 1992 until 9 August 1993, as deputy commander of the KP Dom, **SAVO TODOVIĆ** was the second in command in the prison hierarchy and had similar powers and duties as the camp commander. He supervised the subordinate prison staff on a daily basis.
  - (b) Throughout the period relevant to the indictment, as part of the senior management of the KP Dom prison and in his capacity as the deputy commander, he was instrumental in establishing and maintaining the living conditions in the detention facility as specified in paragraphs 48 and 49 in the indictment. He also communicated with external military and political authorities.
  - (c) Throughout the period relevant to the indictment, he was the person in charge of the detainees. He held the contact with the external authorities in relation to the fate of the detainees. According to the decisions of the outside authorities and with the consent of other members of the senior management, in particular Milorad Krnojelac, **SAVO TODOVIĆ** was in charge of selecting detainees for killings, beatings, interrogations, forced labour,

solitary confinement and exchanges. He was also responsible for the punishment of the detainees.

- (d) Throughout the period relevant to the indictment, he participated in establishing a pattern of widespread mistreatment during the day-time, including torture and beatings as specified in paragraphs 32 to 39 in the indictment, whereby guards according to lists provided by the prison authorities, in particular **SAVO TODOVIĆ**, selected detainees from their cells and took them to interrogation rooms in which they were subjected to severe mistreatment while being interrogated.
- (e) Throughout the period relevant to the indictment, he participated in establishing a pattern of widespread mistreatment during the evening as specified in paragraphs 34 to 39 in the indictment, whereby guards according to lists provided by the prison authorities, in particular **SAVO TODOVIĆ**, selected detainees from their cells and took them to special rooms in the administration building in which they were subjected to assaults including beatings, torture and killings by prison guards and by both military and police staff from outside the prison.
- (f) Throughout the period relevant to the indictment, he participated in establishing and maintaining a system of punishment as specified in paragraphs 27 to 31 in the indictment, in which guards beat the detainees even for minor violations of the prison rules and collective punishment was meted out for actions of individual detainees. **SAVO TODOVIĆ** personally decided which detainees were sent to solitary confinement cell and for which periods of time. He personally ordered the mistreatment of detainees and on two occasions beat and kicked detainees himself as specified in paragraphs 30 and 31 in the indictment.
- (g) Throughout the period relevant to the indictment, he encouraged and gave legitimacy to the mistreatment of detainees by failing to prevent beatings and other inhumane acts that occurred in his presence.
- (h) Throughout the period relevant to the indictment, he contributed to a climate of fear at the KP Dom by threatening prisoners with serious bodily harm if they violated the prison rules, attempted to escape or if they refused to work.
- (i) Throughout the period relevant to the indictment, he participated in the establishment of a system of forced labour as specified in paragraphs 51 to 56 in the indictment, by making lists of which detainee would be working where, by personally assigning the detainees to their work duties, by calling out worker's groups from their rooms in the KP Dom and by threatening and forcing those who refused to work for reasons of illness or weakness. To facilitate forced labour outside the KP Dom, he co-operated with external military and civilian authorities, including the hand-over of detainees to military personnel.
- (j) Throughout the period relevant to the indictment, he participated in the forcible transfer and deportation of detainees from the prison in so-called exchanges as specified in paragraph 19 (f) in the indictment, by selecting

detainees from the KP Dom for transfer to locations outside of the Foča municipality, such as Montenegro and Serbia. He was involved in the disappearance of detainees whereby supposed prisoner exchanges were arranged, but after which these detainees were never seen alive again.

10. **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** knowingly and wilfully participated in the joint criminal enterprise as stated above. They shared the intent and state of mind required for the commission of each of the crimes charged in Counts 1 to 5 and 8 to 12 of the indictment (Category I JCE), or were aware of the existence of a concerted system of ill-treatment within the KP Dom prison and knowingly and wilfully furthered this system by their conduct (Category II JCE in relation to the Counts 1 to 5 and 8 to 12), and in relation to Counts 6 and 7 were aware of the foreseeable consequences of their actions and the actions of the other participants (Category III JCE). Alternatively, they shared the intent and state of mind required for the crimes charged in Counts 8 to 10 (Category I JCE), or were aware of a concerted system of ill-treatment within the KP Dom prison and knowingly furthered this system by their conduct (Category II JCE in relation to the Counts 8 to 10), and in relation to Counts 1 to 7 and 11 to 12 were aware of the foreseeable consequences of their actions and the actions of the other participants (Category III JCE). On this basis, the Accused bear individual criminal responsibility for these crimes under Article 7(1) of the Statute of the Tribunal in addition to their responsibility under that same Article for having planned, instigated, ordered, physically committed or otherwise aided and abetted in the planning, preparation and execution of these crimes.

#### Article 7(3) of the Statute of the Tribunal

11. **MITAR RAŠEVIĆ**, while holding the position of commander of the prison guards and **SAVO TODOVIĆ**, while holding the position of deputy commander of the KP Dom from 20 April 1992 until 9 August 1993, are also, or alternatively, criminally responsible as superiors for the acts of their subordinates pursuant to Article 7(3) of the Statute of the Tribunal. A superior is responsible for the criminal acts of his subordinates if he knew or had reason to know that his subordinates were about to commit such acts or had done so and the superior failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators.

### THE CHARGES

#### COUNT 1 (Persecutions)

12. From April 1992 until October 1994, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise, as specified in paragraph 7 of the indictment, planned, instigated, ordered, committed or otherwise aided and abetted in the planning, preparation or execution of the persecution of the Muslim and other non-Serb male detainees at the KP Dom facility. The particulars of the persecutions are provided in the paragraphs below.

13. Foča city and municipality are located in Bosnia and Herzegovina, southeast of Sarajevo, near the border of Serbia and Montenegro. According to the 1991 census, the population of Foča, which consisted of 40,513 persons, was 51.6 % Muslim, 45.3% Serbian and 3.1 % others.
14. On 7 April 1992, Serb military forces, comprised of JNA, local Serb TO units and Serb paramilitary soldiers from Bosnia and Herzegovina and elsewhere started the take-over of Foča town, which was completed on 16 or 17 April 1992. Surrounding villages remained under siege until mid-July 1992.
15. As soon as the Serb forces controlled parts of Foča town, military police, accompanied by local and non-local soldiers, started arresting Muslim and other non-Serb inhabitants. Until mid-July 1992, the Serb authorities continued to round up and arrest Muslim villagers throughout the municipality. The Serb authorities separated the men from the women and unlawfully confined thousands of Muslims and other non-Serbs.
16. Beginning on or around 14 April 1992, Serb civilian and military authorities began to use the KP Dom prison as the main detention facility for Muslims and other non-Serbs. The prison complex was surrounded by a wall of 3 metres height, with barbed wire on top, and watch towers with machine guns. The inner periphery was mined. Soldiers and prison guards watched the detainees from the towers and regularly patrolled the complex. The detainees were housed in a four-story building which consisted of common prison cells and solitary confinement cells, 3 x 3 metres in size.
17. The detainees were mostly Muslim males. Among the detainees were intellectuals, doctors, journalists, SDA (Party of Democratic Action) members, and a few Serbs who had tried to avoid military service. Serb detainees were separated from the non-Serb detainees and kept under considerably better conditions than the non-Serb detainees. Because of continuing arrests, the prison was overcrowded during the first few months, with the number of detainees reaching a peak of more than 760. During the remainder of 1992, the camp population averaged about 600 detainees. The majority of detainees were exchanged, released or disappeared during 1992 and 1993. The KP Dom functioned as a detention facility until 5 October 1994.
18. Most, if not all, detainees were civilians who had not been charged with any crime. The detainees were primarily Muslim men from 16 to 80 years of age, including mentally handicapped, physically disabled and seriously ill persons.
19. The persecutions in which **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** participated were based on political, racial or religious grounds and included the following:
  - (a) the prolonged and routine imprisonment and confinement within the KP Dom facility of Muslim and other non-Serb male civilian inhabitants of Foča municipality and its environs;

- (b) the establishment and perpetuation of inhumane conditions against Muslim and other non-Serb male civilian detainees within the KP Dom detention facility as specified in paragraphs 48 and 49 of the indictment;
- (c) the repeated torture and beatings of Muslim and other non-Serb male detainees at KP Dom as specified in paragraphs 22 to 39 of the indictment;
- (d) the numerous killings of Muslim and other non-Serb male civilian detainees at KP Dom as specified in paragraphs 43 to 45 of the indictment;
- (e) the prolonged and frequent forced labour of Muslim and other non-Serb male civilian detainees at KP Dom as specified in paragraphs 52 to 56 of the indictment; and
- (f) the deportation and forcible transfer of Muslim and other non-Serb civilians detained in the KP Dom detention facility to Montenegro and other known and unknown places.
  - (i) Beginning no later than July 1993 and continuing until October 1994, several groups of detainees were transported to other detention facilities in Kalinovik, Rudo and Kula. By the end of September 1994, over 85 detainees had been taken to these detention centres. At least 187 detainees were transferred in October 1994, after which no detainees remained at the KP Dom. **SAVO TODOVIĆ** provided the lists of detainees selected for exchanges and read out the detainees names from such lists as they were boarding the buses. On 4 or 5 October 1994, **MITAR RAŠEVIĆ** personally transported 61 detainees to the Kula detention facility. **SAVO TODOVIĆ** saw off this last group of detainees who were exchanged from Foča. The bus with detainees selected for exchange was stopped in Kula and directed to a motel in Miljevina. **SAVO TODOVIĆ**, together with the then head of KP Dom, Zoran Sekulović, participated in talks at that motel in Miljevina whereupon the bus was re-directed to Kula.
  - (ii) In late August 1992, **SAVO TODOVIĆ** personally saw off a group of 55 detainees to a destination in Montenegro and instructed them not to look out of the windows of the bus or else something would happen to them. However, the bus was intercepted by military personnel and returned to the KP Dom. The next day, 35 elderly or ill detainees were deported by bus from KP Dom to Rožaj in Montenegro. On that same day, about 20 Muslim detainees, previously selected with the 35 detainees to be deported to Montenegro, were taken for an alleged exchange in Goražde. These detainees have never been seen alive again.
  - (iii) On or about 17 September 1992, between 35 and 60 detainees were taken out of the prison for the alleged purpose of picking plums. They did not return.
  - (iv) On 18 September 1992, **SAVO TODOVIĆ** removed FWS-109 and G.K. from a group that was waiting to be exchanged in front of the

administration building. He told them that he needed them to clear mines.

- (v) From June 1992 until March 1993, at least 200 Muslims and other non-Serbs detained in the KP Dom were deported and transferred in so-called exchanges to unknown places. These detainees have never been seen alive again. The majority of these disappearances occurred from August 1992 to October 1992.

20. By these acts and omissions, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** committed:

**Count 1:** Persecutions on political, racial and religious grounds, a **CRIME AGAINST HUMANITY**, punishable under Article 5(h), Article 7(1) and Article 7(3) of the Statute of the Tribunal.

**COUNTS 2 to 5  
(Torture and Beatings)**

21. From April 1992 until October 1994, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise as specified in paragraph 7 of the indictment planned, instigated, ordered, committed or otherwise aided and abetted in the planning, preparation or execution of torture and beatings against Muslim and other non-Serb male detainees at the KP Dom facility. The particulars of the beatings and torture are provided in the paragraphs below.

Beatings Associated with the Canteen

22. On an unknown date in June 1992, the detainee E. G., who was disabled in one arm and leg, and also suffered from epilepsy, complained about the small food rations. As a result, he was beaten and kicked by three unidentified guards.
23. On an unknown date at the end of October or beginning of November 1992, in the presence of unidentified guards, unidentified soldiers from Nevesinje assaulted detainees FWS-214 and FWS-113 when they left the canteen.

Arbitrary Beatings

24. During their confinement, the detainees were subjected to sudden arbitrary beatings by guards or soldiers from outside KP Dom for unknown reasons. These beatings usually occurred during the evenings and nights when local military and paramilitary staff came to the prison. The prison guards led the soldiers to the various cells to select detainees for beatings. These beatings are described in paragraphs 25 and 26 and attached **Schedule A**.
25. On 10 June 1992, the detainee Z. B. was beaten severely by a KP Dom guard. After the beating, the detainee was locked in a solitary confinement cell for about one month in inhumane conditions. Due to the beating and the mistreatment, Z. B. became deaf.

26. On 11 July 1992, two guards called out the detainee FWS-71 from his cell, took him to the solitary confinement cells in the detainees' building and beat him with various objects for about 20 minutes until he fainted. When he regained consciousness in his cell, he had bruises all over his body.

#### Torture and Beatings as Punishment

27. The detainee FWS-54 was in charge of distributing food to the detainees. While giving him this task, **SAVO TODOVIĆ** warned him not to give any extra food to detainees. On 8 August 1992, FWS-54 gave an extra slice of bread to a detainee. As punishment, the witness was kicked and beaten with a truncheon by a guard and locked in solitary confinement. **MITAR RAŠEVIĆ** released FWS-54 after four days.
28. On an unknown date during the summer of 1992, detainees A. M., F. M. and S., who passed messages to one another, were beaten by the guard Dragomir Obrenović (a.k.a "Dragan" or "Obren") as punishment.
29. On an unknown date in April or May 1993, at approximately 6:00 in the morning, guards Dragomir Obrenović and Zoran Matović called out detainees FWS-71, FWS-76, and I.I. and D.C. from their rooms and led them to the solitary confinement cells in the prisoners' quarters. In the corridor, these guards beat the detainees as punishment for stealing bread from the canteen the previous day.
30. On 8 July 1993, E. Z., a Muslim detainee, attempted to escape from the KP Dom, but was re-captured that same day. Upon being returned to the KP Dom, he was severely beaten by a prison guard. He was confined in an isolation cell for 28 days during which time he was mistreated and beaten by **SAVO TODOVIĆ** with a chain and his bare hands. He was also beaten by other guards during these 28 days.
31. On 8 July 1993, **SAVO TODOVIĆ** informed all detainees that, as a collective punishment for E.Z.'s escape, all food rations would be halved and that work and medical treatment would be forbidden. This regime was implemented for a period of ten days. FWS-73, FWS-110, FWS-144, FWS-210 and approximately 10 other detainees, all work companions of E. Z. and the detainee in charge of E. Z.'s room, were taken to the administration building and severely beaten by about 10 members of the prison staff. FWS-73 was beaten and kicked in his lower abdominal region for approximately five minutes by **SAVO TODOVIĆ** and others. FWS-110 was kicked so severely that he lost consciousness. As further punishment, FWS-73, FWS-110, FWS-144, FWS-210, and other unidentified detainees were locked in solitary confinement for various time periods lasting up to 15 days.

#### Torture and Beatings During Interrogations

32. Local and military police, in concert with the prison authorities, interrogated the detainees after their arrival at the KP Dom. The interrogations focused on whether the detainee was an SDA member, possessed weapons, or had fought

against the Serb forces. During or after the interrogations, the guards and police officials often beat the detainees.

33. On 24 May 1992, military police arrested FWS-03 and H.D., both members of the SDA, and their neighbour, H. S., and took them all to KP Dom. On the same day, 5 or 6 military policemen interrogated them at KP Dom. The policemen beat all three of them during the interrogation to force them to give a confession. The beatings were so severe that H. S. fainted twice.
34. From April until July 1992, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** with other high-level prison staff at the KP Dom established a daily routine for these beatings. They prepared lists of detainees to be beaten especially during night-time interrogations. The selected detainees were mostly prominent inhabitants of Foča who were suspected of not having told the truth during the daytime interrogations.
35. On most evenings during this time, guards called out the names of detainees from the lists, took them out of their rooms to the administration building for additional interrogations and beatings.
36. The guards and soldiers assaulted the detainees with all sorts of weapons, including batons, rifle butts, knives and tools. Some of the detainees returned to their rooms severely injured. Certain detainees were selected for beatings several times. A substantial number of the selected detainees never returned from the beatings and are still missing. These incidents are further described in paragraphs 37 to 39 and attached **Schedule B**.
37. In June or July 1992, KP Dom guards seriously tortured Zulfo Veiz, a former policeman, and Nurko Nisić, a former officer from the municipality administration and an SDA member, on at least two occasions. In addition, KP Dom guards severely beat Salem Bičo, a former policeman. The three detainees were returned to their cells bruised, bloody and seriously injured.
38. In June 1992, KP Dom guards tortured and beat detainee S. M., having mistaken him for another detainee whose name appeared on the list of detainees who had been selected for interrogation and torture. The perpetrators beat and cut S. M. with a knife. They threatened to take out his eye. While he was being beaten, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** appeared, discovered the mistake, and ordered the guards to stop beating S. M. The victim was returned to his cell, seriously injured and covered in blood.
39. Between May and July 1992, on at least two occasions, the KP Dom guards and military policemen tortured and beat detainee A. S.. As a result of the torture, A. S. suffered three broken ribs. In addition, KP Dom guards and military policemen severely beat the detainees Vahida Džemal, a former policeman, Enes Uzunović, an SDA member, and E. C. Due to the severity of the beatings, Vahida Džemal's jaw was broken and he lost several teeth. Three fingers of E. C.'s hand were broken and his body was bruised. After the beatings the victims were kept in solitary confinement for several days and then returned to their cells severely injured. Enes Uzunović and Vahida Džemal later were killed as described in paragraphs 43 to 45.

40. By the acts or omissions described in paragraphs 27 to 39, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** committed:

**Count 2:** Torture, a **CRIME AGAINST HUMANITY**, punishable under Article 5 (f), Article 7(1) and Article 7(3) of the Statute of the Tribunal.

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

41. By the acts or omissions described in paragraphs 22 to 39, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** committed:

**Count 4:** Inhumane Acts, a **CRIME AGAINST HUMANITY**, punishable under Article 5(i), Article 7(1) and Article 7(3) of the Statute of the Tribunal.

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

#### **COUNTS 6 and 7 (Wilful Killings and Murder)**

42. From April 1992 until October 1994, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise, as specified in paragraph 7 of the indictment, planned, instigated, ordered, committed or otherwise aided and abetted in the planning, preparation or execution of wilful killings and murder of Muslim and other non-Serb male detainees at the KP Dom facility. The particulars of the wilful killings and murder are provided in the paragraphs below.
43. Between June and August 1992, KP Dom guards selected groups of detainees according to lists provided by the prison authorities including **MITAR RAŠEVIĆ** and, in particular, **SAVO TODOVIĆ**, and took the detainees, one by one, into a room in the administration building. In this room, the guards and soldiers, including members of the military police, would often chain a detainee, with his arms and legs spread, before beating him. The guards and soldiers, including members of the military police, kicked and beat each detainee with rubber batons, axe-handles and fists. During the beatings, the guards and soldiers, including members of the military police, asked the detainees where they had hidden their weapons or about their knowledge of other persons.
44. After some of the beatings, the guards threw the detainees on blankets, wrapped them up and dragged them out of the administration building.

45. An unknown number of the tortured and beaten detainees died during these incidents. Some of those still alive after the beatings were shot or died from their injuries in the solitary confinement cells. The beatings and torture resulted in the deaths of the detainees listed in attached **Schedule C**, as well as the deaths of an unknown number of other unidentified detainees.
46. By these acts or omissions, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** committed:

**Count 6:** Murder, a **CRIME AGAINST HUMANITY**, punishable under Article 5 (a), Article 7(1) and Article 7(3) of the Statute of the Tribunal.

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

**COUNTS 8 to 10**  
**(Imprisonment, Inhumane Acts and Cruel Treatment)**

47. From April 1992 until October 1994, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise as specified in paragraph 7 of the indictment, planned, instigated, ordered, committed or otherwise aided and abetted in the planning, preparation or execution of imprisonment of Muslim and other non-Serb male detainees under inhumane conditions at the KP Dom facility. The particulars of the imprisonment, inhumane acts and cruel treatment are provided in the paragraphs below.
48. The conditions in the KP Dom were brutal. During their confinement, the detainees were locked in their cells at all times except when they were lined up and taken to the canteen to eat or to work duties. After April 1992, the cells were overcrowded, with insufficient facilities for bedding and personal hygiene. The detainees were fed starvation rations. They had no change of clothes. During the winter, they had no heating. They received no proper medical care. As a result of the living conditions in the KP Dom, the health of many detainees seriously deteriorated. Due to the lack of proper medical treatment, a 40-year old detainee, Enes Hadžić, died in April or May 1992 from a perforated ulcer. Additional incidents are described in the attached **Schedule D**.
49. The sounds of torture, beatings and killings, as specified in paragraphs 22 to 39 and 43 of this indictment, were audible to the detainees. The solitary confinement cells were used as a source of terror and threats. As a result, the detainees lived in constant fear that they would be the next victims. Due to this psychological pressure, some of the detainees became suicidal, while others simply became indifferent as to what would happen to them. Most, if not all of the detainees, suffered from depression and still bear the physical and psychological wounds resulting from their confinement at KP Dom. These incidents are described in the attached **Schedule D**.

50. By these acts and omissions **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** committed:

**Count 8:** Imprisonment, a **CRIME AGAINST HUMANITY**, punishable under Article 5 (e), Article 7(1) and Article 7(3) of the Statute of the Tribunal.

**Count 9:** Inhumane Acts, a **CRIME AGAINST HUMANITY**, punishable under Article 5(i), Article 7(1) and Article 7(3) of the Statute of the Tribunal.

**Count 10:** Cruel Treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Article 3, Article 7(1) and Article 7(3) of the Statute of the Tribunal.

**COUNTS 11 to 12  
(Enslavement)**

51. From May 1992 until October 1994, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ**, acting individually or in concert with other known and unknown members of the joint criminal enterprise as specified in paragraph 7 of the indictment, planned, instigated, ordered, committed or otherwise aided and abetted in the planning, preparation or execution of enslavement of Muslim and other non-Serb male detainees at the KP Dom facility. **SAVO TODOVIĆ** played a central role in the work done by the detainees. He was responsible for assigning work duties to the detainees and supervised these assignments on a daily basis. The particulars of the enslavement are provided in the paragraphs below.
52. From May 1992 until October 1994, detainees with special skills were subjected to forced labour within and outside of the prison. To facilitate forced labour outside the KP Dom, **SAVO TODOVIĆ** co-operated with external military and civilian authorities, including the hand-over of detainees to military personnel. High-level prison staff at the KP Dom, including **MITAR RASEVIC** and, in particular, **SAVO TODOVIĆ**, assigned detainees to perform particular work. The names of detainees subjected to forced labour are provided in attached **Schedule E**.
53. The guards called out selected detainees from their cells and either took them to their place of work or handed them over to authorities outside the prison hierarchy to perform various work. The detainees were usually forced to work on a daily basis from 7 a.m. to at least 3 or 4 p.m. They were not paid for their work nor was it voluntary. Even ill or injured detainees were forced by **SAVO TODOVIĆ** personally to work. During their work, the detainees were under armed supervision either by the regular prison guards or by Serb soldiers.
54. Within the prison, the detainees had to work in the furniture factory and the metal and mechanical workshop. In the workshop, the detainees had to repair army vehicles. The labour performed by the detainees was challenging and physically exhausting.

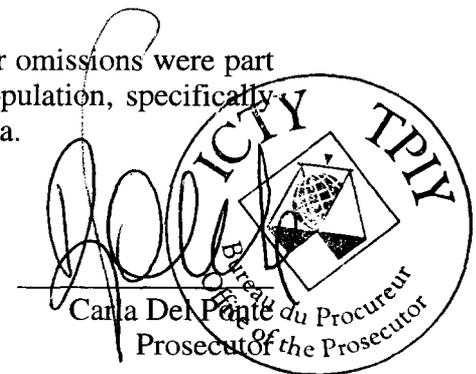
55. Outside the prison, the detainees were forced to perform farming jobs at the prison outpost Brioni, to work in mills and the Miljevina mine, and to clean up rubble of damaged buildings at various places in Foča. **MITAR RAŠEVIĆ** was present while detainees were performing forced labour at the farm. During the winter of 1992 to 1993, detainees were forced to repair the private house of Milorad Krnojelac, the warden of the KP Dom, to install a bar in the house of one of his sons, and to furnish a store for one of his sons.
56. On 18 September 1992, detainees FWS-109 and G. K. were called out by a KP Dom guard for a supposed prisoner exchange. Instead, **SAVO TODOVIĆ** handed the two detainees over to military authorities from outside the prison who took them to the Kalinovik police station to be used as drivers for the detection of land mines. Between September 1992 and March 1993, on at least 5 occasions, they had to drive ahead of Serb convoys to detect land mines. The detainees worked under severe pressure with the danger that every day at work would be their last.
57. By these acts or omissions, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** committed:

**Count 11:** Enslavement, a **CRIME AGAINST HUMANITY**, punishable under Article 5 (c), Article 7(1) and Article 7 (3) of the Statute of the Tribunal.

**Count 12:** Slavery, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised under the Slavery Convention and International Customary Law, punishable under Article 3, Article 7(1) and Article 7 (3) of the Statute of the Tribunal.

### GENERAL LEGAL ALLEGATIONS

58. At all times relevant to this indictment, a state of armed conflict existed in the Republic of Bosnia-Herzegovina in the territory of the former Yugoslavia.
59. At all times relevant to this indictment, **MITAR RAŠEVIĆ** and **SAVO TODOVIĆ** were required to abide by the laws or customs governing the conduct of war.
60. In each count charging crimes against humanity, the acts or omissions were part of a widespread or systematic attack against a civilian population, specifically the Muslim and Croat population of the municipality of Foča.



Dated this 24<sup>th</sup> day of March 2006  
At The Hague, The Netherlands

**SCHEDULE A**  
**LIST OF ARBITRARY BEATINGS**

NO	DATE	VICTIM	TIME <sup>1</sup>	LOCATION	PERPETRATOR	
					Name	Role
1.	Between 20 April and June 1992	Č. M.	Night on numerous occasions	Prisoners' quarters Room 15	SAVIĆ, Jovo	Guard
2.	About 22 to 23 April 1992	D. A.	Night	Room in prisoners' quarters	Unknown	Guard
3.	Between May and October 1992	FWS-198	Unknown	Corridor in prisoners' quarters	MARIĆ, fnu	Guard
4.	Between April and August 1992	K. K.	Evening	Prisoners' room near room 13	Unknown	Either guards or soldiers
5.	Between April and August 1992	K. fnu.	Evening	Prisoners' room near room 13	Unknown	Either guards or soldiers
6.	From May 1992 Onwards	FWS-82	After meal on several occasions	On way back from kitchen to prisoners' quarters	VUKOVIĆ, Radovan	Guard

<sup>1</sup> Incident Occurred on One Occasion Unless Otherwise Specified

**SCHEDULE B****LIST OF DETAINEES WHO WERE BEATEN DURING INTERROGATIONS AT THE KP DOM**

NO	DATE	VICTIM	TIME <sup>1</sup>	LOCATION	PERPETRATOR	
					Name	Role
1.	28 June 1992	B. fnu. (son of S.)	Evening	Admin. building ground floor	Unknown	Guards and/or soldiers including Military police
2.	Between 24 June 1992 and beginning of August 1992	D. (probably) R.	Evening	Admin. building ground floor	Unknown	Military police including victim's neighbours
3.	From June 1992 to mid-July 1992	D. N.	After lunch or dinner	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
4.	Between May 1992 and August 1992	DŽAMALIJA, Juso	Evening	Admin. building ground floor	BURILO, Milenko,  OBRENOVIĆ, Dragomir, aka Dragan, aka Obren,  and unknown others.	Guards and soldiers including military police
5.	From June 1992 to mid-July 1992	D. H.	After lunch or dinner	Admin. building ground floor	BURILO, Milenko  OBRENOVIĆ, Dragomir, aka Dragan, aka Obren  and unknown others.	Guards and soldiers including military police

<sup>1</sup> Incident Occurred on One Occasion Unless Otherwise Specified

**SCHEDULE B****LIST OF DETAINEES WHO WERE BEATEN DURING INTERROGATIONS AT THE KP DOM**

NO	DATE	VICTIM	TIME <sup>1</sup>	LOCATION	PERPETRATOR	
					Name	Role
6.	Between end of May 1992 and beginning of July 1992	DŽELILOVIĆ, Kemo	Evening	Admin. building ground floor	BURILO, Milenko MATOVIĆ, Zoran OBRENOVIĆ, Dragomir, aka Dragan, aka Obren and unknown others.	Guards and soldiers including military police
7.	Between May 1992 and August 1992	DŽENDUŠIĆ, Ramo	Evening	Admin. building ground floor	BURILO, Milenko OBRENOVIĆ, Dragomir, aka Dragan, aka Obren and unknown others.	Guards and soldiers including military police
8.	Between 24 May 1992 and 07 July 1992	F. E.	Evening	Admin. building ground floor	BURILO, Milenko OBRENOVIĆ, Dragomir, aka Dragan, aka Obren and unknown others.	Guards and soldiers including military police
9.	Between 26 June 1992 and 14 July 1992	G. A.	Evening	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
10.	Prior to June/July 1992	H. fnu.	Evening	Admin. building ground floor	Unknown	Guards and/or soldiers including military police

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**SCHEDULE B****LIST OF DETAINEES WHO WERE BEATEN DURING INTERROGATIONS AT THE KP DOM**

NO	DATE	VICTIM	TIME <sup>1</sup>	LOCATION	PERPETRATOR	
					Name	Role
11.	Prior to June/July 1992	H. fnu.	Evening	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
12.	Between May 1992 and August 1992	HODŽIĆ, Nail	Evening	Admin. building ground floor	BURILO, Milenko OBRENOVIĆ, Dragomir, aka Dragan, aka Obren, and unknown others.	Guards and soldiers including military police
13.	Between 26 June 1992 and 14 July 1992	I. K.	Evening	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
14.	Between 24 May 1992 and 7 July 1992	I. M.	Evening	Admin. Building ground floor	Unknown	Guards and soldiers including military
15.	June 1992	K.I.	After lunch or dinner	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
16.	Between May 1992 and August 1992	KONJO, Halim	Evening	Admin. building ground floor	BURILO, Milenko OBRENOVIĆ, Dragomir, aka Dragan, aka Obren and unknown others.	Guards and soldiers including military police

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**SCHEDULE B****LIST OF DETAINEES WHO WERE BEATEN DURING INTERROGATIONS AT THE KP DOM**

NO	DATE	VICTIM	TIME <sup>1</sup>	LOCATION	PERPETRATOR	
					Name	Role
17.	Between May 1992 and Oct 1992	KULOGLIJA, Mustafa	After 19.00 p.m.	Admin. building ground floor	BURILO, Milenko OBRENOVIĆ, Dragomir, aka Dragan, aka Obren and unknown others.	Guards and soldiers including military police
18.	From mid May to July 1992	M. F.	Evening.	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
19.	From June 1992 to mid-July 1992	M. E.	After lunch or dinner	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
20.	From June 1992 to mid-July 1992	R. H.	After lunch or dinner	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
21.	Between May 1992 and August 1992	RIKALO, Husko	Evening	Admin. building ground floor	BURILO, Milenko OBRENOVIĆ, Dragomir, aka Dragan, aka Obren and unknown others.	Guards and/or soldiers including military police
22.	From May 1992 to end of Aug. 1992	RIKALO, the two brothers	Daytime	Interrogation rooms, admin. building	VLADIČIĆ, fnu	Police inspector

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**SCHEDULE B****LIST OF DETAINEES WHO WERE BEATEN DURING INTERROGATIONS AT THE KP DOM**

NO	DATE	VICTIM	TIME <sup>1</sup>	LOCATION	PERPETRATOR	
					Name	Role
23.	End of June 1992	Š. H.	Evening On several occasions	Admin. building ground floor	Drakul, aka Zliko KRNOJELAC, fnu MILETIĆ, fnu 'Pikolo'	Guards and soldiers including military police
24.	Prior to June/July 1992	S. H.	Evening	Admin. building ground floor	Unknown	Guards and/or soldiers including military police
25.	Between May 1992 and Oct 1992	S. M.	Evening	Admin. building ground floor	BURILO, Milenko OBRENOVIĆ, Dragomir, aka Dragan, aka Obren  and unknown others.	Guards and/or soldiers including military police
26.	Between February 1993 And May 1993	FWS-159	Unknown On about 10 occasions	Prisoners' quarters, isolation cell	MATOVIĆ, Zoran	Guard

**SCHEDULE B**

**LIST OF DETAINEES WHO WERE BEATEN DURING INTERROGATIONS AT THE KP DOM**

NO	DATE	VICTIM	TIME <sup>1</sup>	LOCATION	PERPETRATOR	
					Name	Role
27.	Between April and August 1992	VEIZ, Munib	After 1800 hrs on several occasions	Interrogation rooms, admin. building	VLADIČIĆ, Zoran KOPRIVICA, Miso GAŠOVIĆ, Petko STAROVIĆ, Vojislav and unknown others.	Police and military policemen

**SCHEDULE C**  
**LIST OF DETAINEES WHO DIED AS A RESULT OF BEATINGS AND TORTURE AT THE KP DOM**

<b>NO.</b>	<b>VICTIM</b>
1.	ALTOKA, Alija
2.	BİÇO, Salem
3.	ČANKUŠIĆ, Abdurahman
4.	ČANKUŠIĆ, Refik
5.	ČEDIĆ, Enko
6.	DŽELILOVIĆ, Kemal
7.	DŽEMAL, Vahida
8.	DŽENDUŠIĆ, Ramo
9.	GRANOV, Adil
10.	IVANČIĆ, Mate
11.	KISELICA, Esad
12.	KONJO, Halim
13.	KRAJČIN, Adil
14.	KULOGLIJA, Mustafa
15.	MANDŽO, Fuad
16.	MARINOVIC, Krunoslav
17.	NIŠIĆ, Nurko
18.	RAMOVIĆ, Hamid
19.	RIKALO, Husein
20.	RIKALO, Mithat
21.	RIKALO, Zaim
22.	ŠORO, Ševal
23.	TULEK, Kemal
24.	UZUNOVIĆ, Enes
25.	VEIZ, Munib
26.	VEIZ, Zulfo

**SCHEDULE D****LIST OF DETAINEES WHO DIED OR SUFFERED PHYSICAL AND / OR PSYCHOLOGICAL EFFECTS DUE TO LIVING CONDITIONS AT THE KP DOM.**

<b>NO.</b>	<b>DATES</b>	<b>VICTIM</b>	<b>PHYSICAL OR MENTAL EFFECTS</b>	<b>LONG TERM EFFECTS</b>
1.	From May 1992 to August 1993	FWS-214	Physical symptoms of malnutrition and Post Traumatic Stress Disorder.	Yes
2.	From May 1992 to August 1993	B. E. (schizophrenic)	Self-mutilation due to lack of treatment and stress.	Yes
3.	From May 1992 to August 1993	FWS-66	Diabetics, high blood pressure and stress, hardly able to walk - pain in legs and psychological effects due to trauma.	
4.	From May 1992 to August 1993	FWS-109	Physical symptoms of malnutrition causing <i>inter alia</i> high blood pressure.	
5.	From May 1992 to August 1993	FWS-71	Physical symptoms of malnutrition, exposure to extreme cold and psychological effects due to trauma, kidney problems due to living conditions and beatings.	Yes
6.	From February 1993	D. E.	Physical results due to denial of medical help for injuries.	
7.	From May 1992 to August 1993	FWS-78	Depression due to living conditions.	Yes
8.	From May 1992 to August 1993	FWS-139	Physical symptoms of malnutrition and psychological effects due to abuse.	
9.	From May 1992 to August 1993	FWS-162	Physical symptoms of malnutrition.	
10.	From April 1992 to August 1993	FWS-182	Malnutrition, victim had stomach problem which became worse during detention.	Yes
11.	From May 1992 to August 1993	FWS-209	Physical symptoms of malnutrition.	

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**SCHEDULE D**

**LIST OF DETAINEES WHO DIED OR SUFFERED PHYSICAL AND / OR PSYCHOLOGICAL EFFECTS DUE TO LIVING CONDITIONS AT THE KP DOM.**

<b>NO.</b>	<b>DATES</b>	<b>VICTIM</b>	<b>PHYSICAL OR MENTAL EFFECTS</b>	<b>LONG TERM EFFECTS</b>
12.	From May 1992 to August 1993	FWS-111	Physical symptoms of malnutrition and Post Traumatic Stress Disorder.	Yes
13.	From 23 June 1993	KUNOVAC, Omer	Died after beating due to lack of needed surgery.	
14.	From May 1992 to August 1993	FWS-144 and many other detainees	Physical symptoms of malnutrition, exposure to extreme cold and unhygienic conditions; recurring nightmares.	Yes
15.	From May 1992 to August 1993	FWS-85 and other detainees	Physical symptoms of malnutrition and exposure to extreme cold, including swollen hands and knees.	
16.	From May 1992 to August 1993	FWS-104	Physical and psychological symptoms due to malnutrition and abuse during detention.	Yes
17.	From October 1992 to December 1992	FWS-215	Became sick due to the coldness experienced in the isolation cell.	
18.	From June 1992 to August 1993	FWS-86	Physical results including a heart attack in June 1992 and psychological effects.	Yes
19.	From April 1992 to June 1993	FWS-82	Suffered depression, became suicidal, developed kidney, hip and back problems due to the cold and malnutrition.	Yes

**SCHEDULE E**  
**LIST OF DETAINEES WHO WERE FORCED TO WORK**

NO.	DATE From/Btwn	DATE To	VICTIM	COMMENT
1.	July 92	October 92	A. U.	
2.	May 92	October 94	FWS-89	Worked, inter alia, in the mine in Miljevina
3.	June or July 92	October 94	FWS-65	
4.	June or July 92	October 94	B. M.	
5.	May 92	October 94	B. O.	
6.	May 92	October 94	B. fnu.	Worked, inter alia, on the property of Milorad Krnojelac
7.	May 92	October 94	FWS-66	
8.	September 92	March 93	FWS-109	Worked, inter alia, as driver on the front line
9.	May 93	October 94	FWS-71	
10.	May 92	October 94	D. M.	
11.	July 92	October 94	G. A.	
12.	July 92	October 94	FWS-138	
13.	October 92	October 94	H. A.	Worked, inter alia, in the mine in Miljevina
14.	July 92	October 94	FWS-78	Worked, inter alia, in the mine in Miljevina
15.	July 92	October 94	FWS-77	
16.	July 92	October 94	H. M.	
17.	Beginning of 93	August 94	FWS-182	
18.	June 92	November 92	FWS-141	Worked, inter alia, as driver on the front line
19.	July 92	October 94	I. S.	
20.	July 92	Winter 92/93	J.A.	Worked, inter alia, on the property of Milorad Krnojelac
21.	June or July 92	October 94	K. fnu.	
22.	June or July 92	16 August 94	FWS-142	Worked, inter alia, in the mine in Miljevina

**SCHEDULE E**  
**LIST OF DETAINEES WHO WERE FORCED TO WORK**

NO.	DATE From/Btwn	DATE To	VICTIM	COMMENT
23.	July 92	October 94	K. S.	
24.	July 92	August 92	FWS-48	
25.	July 92	December 93	KUBAT, Šefko	
26.	September 92	March 93	K. G.	Worked, inter alia, as driver on the front line
27.	July 92	October 94	FWS-144	Worked, inter alia, on the property of Milorad Krnojelac
28.	May 92	October 94	FWS-210	Worked, inter alia, on the property of Milorad Krnojelac
29.	August 93	October 94	FWS-85	
30.	May 92	October 94	M. fnu.	Worked, inter alia, on the property of Milorad Krnojelac
31.	July 92	October 94	M. R. or A.	
32.	July 92	October 94	M. S.	
33.	September 92	October 94	P. J.	Worked, inter alia, in the mine in Miljevina
34.	May 92	October 94	FWS-73	
35.	July 92	October 94	R. T.	Worked, inter alia, in the mine in Miljevina
36.	June or July 92	16 August 94	Š. D.	Worked, inter alia, in the mine in Miljevina
37.	May 92	June 93	FWS-82	
38.	May 92	October 94	FWS-83	Worked, inter alia, on the property of Milorad Krnojelac
39.	May 92	October 94	FWS-213	Worked, inter alia, on the property of Milorad Krnojelac
40.	June or July 92	16 August 94	Z. A.	Worked, inter alia, in the mine in Miljevina
41.	July 92	October 94	FWS-216	Worked, inter alia, on the property of Milorad Krnojelac and in the mine in Miljevina