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03 March 2005

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

Case No. IT-05-__-I

**THE PROSECUTOR
OF THE TRIBUNAL**

AGAINST

**VINKO PANDUREVIĆ
MILORAD TRBIĆ**

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:

VINKO PANDUREVIĆ

with **GENOCIDE, CONSPIRACY TO COMMIT GENOCIDE, Murder, Persecutions, Forcible Transfer and Inhumane Acts as , CRIMES AGAINST HUMANITY; and Murder as a VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as set forth below; and

MILORAD TRBIĆ

With **Murder, as a CRIME AGAINST HUMANITY**, as set forth below;

BACKGROUND

1. After armed conflict erupted in the Republic of Bosnia and Herzegovina in the spring of 1992, Bosnian Serb military and paramilitary forces occupied cities, towns and villages in the eastern part of the country and participated in an ethnic cleansing campaign which resulted in an exodus of Bosnian Muslim civilians to enclaves in Srebrenica, Goražde and Žepa.
2. On 16 April 1993, the Security Council of the United Nations, acting pursuant to Chapter VII of its Charter, adopted Resolution 819, in which it demanded that all parties to the conflict in the Republic of Bosnia and Herzegovina treat Srebrenica and its surroundings as a "safe area" which was to be free from any armed attack or any other hostile act.
3. On or about 6 July 1995, units of the Drina Corps of the Army of Republika Srpska (VRS) shelled Srebrenica and attacked Dutch-manned United Nations observation posts which were located in the "safe area". The Drina Corps attack on the Srebrenica

“safe area” continued through 11 July 1995, when forces from the Drina Wolves, the Bratunac Brigade and other units of the VRS entered Srebrenica.

4. The Bosnian Muslim men, women and children who were in Srebrenica after the beginning of the VRS attack took two courses of action. Several thousand women, children and some mostly elderly men fled to the UN compound in Potočari, located within the “safe area” of Srebrenica, where they sought the protection of the Dutch battalion. The Bosnian Muslim civilians remained in and around Potočari from 11 July until 13 July 1995, during which time they were terrorised by members of the VRS. Thereafter, they were transported by buses and trucks under the control of the VRS to areas outside the enclave.

5. A second group of approximately 15,000 Bosnian Muslim men, with some women and children, gathered at Šušnjari village near Srebrenica during the evening of 11 July 1995 and fled, in a huge column, through the woods towards Tuzla. Approximately one-third of this group consisted of armed Bosnian Muslim military personnel. The rest were unarmed military personnel and civilians.

6. On or about 12 July 1995, Ratko Mladić and Radislav Krstić, as well as other VRS and Bosnian Serb civilian representatives, met in the Hotel Fontana in Bratunac with Dutch military officers and representatives of the Bosnian Muslim refugees from Potočari. At this meeting, Ratko Mladić explained to the group that he would supervise the “evacuation” of refugees from Potočari and wanted to see all the Bosnian Muslim men between approximately the ages of 16 and 60 to screen for possible war criminals.

7. On or about 12 July 1995, in the presence of Ratko Mladić and Radislav Krstić, approximately 50 to 60 buses and trucks arrived near the UN military compound in Potočari. Shortly after the arrival of these vehicles, the deportation process of Bosnian Muslim refugees started. As Bosnian Muslim women, children and men started to board the buses and trucks, Bosnian Serb military personnel separated the men from the women and children and detained the men in and around Potočari.

8. Between the evening of 11 July 1995 and the morning of 12 July 1995, the Bosnian Muslims who had gathered in Šušnjari formed a huge column and began their trek through the woods towards Tuzla.

9. Bosnian Serb forces assigned to the Bratunac, Zvornik and Milići Brigades, as well as elements of the 5th Engineer Battalion, the 65th Protection Regiment and MUP Special Police forces, supported by armoured personnel carriers, tanks, anti-aircraft guns and artillery, positioned themselves along the Bratunac-Milići road in an attempt to intercept the column. Some of the armed members of the retreating column of Bosnian Muslims engaged in combat with the Bosnian Serb forces. Thousands of Bosnian Muslims from the retreating column were captured by, or surrendered to, Bosnian Serb military forces under the command and control of Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ**.

10. Between 11 July 1995 and 18 July 1995, VRS forces, under the command and control of Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ**, participated in numerous incidents of opportunistic killings of Bosnian Muslim men shortly after they had been captured, as well as systematic summary executions of Bosnian Muslim men who were detained and killed in the area of their detention and others, who were

transported to various execution sites throughout the territory under the control of the VRS Drina Corps. The VRS forces, under the command and control of Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ**, executed thousands of Bosnian Muslim men. **MILORAD TRBIĆ**, a security officer in the Zvornik Brigade, under the command of **VINKO PANDUREVIĆ**, took part in organising the receipt, detention and murder of thousands of Bosnian Muslim men transported to the zone of responsibility of the Zvornik Brigade from 13 through 17 July 1995, and personally executed in Orahovac Muslim men from Srebrenica during this time period.

11. Between 11 July 1995 and the 18 July 1995, the VRS forces, under the command and control of Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ**, either expelled or killed most of the members of the Bosnian Muslim population of the Srebrenica enclave. As a result of these actions, the VRS forces virtually eliminated the presence of any Bosnian Muslims in the Srebrenica enclave area, thus continuing an ethnic cleansing campaign which had begun in the spring of 1992.

THE ACCUSED

12. **VINKO PANDUREVIĆ** was born in 1959 in the Bosnian Serb town of Sokolac. He rose to the rank of Captain First Class (Infantry Branch) in the JNA. When the armed conflict began in Bosnia and Herzegovina, he was appointed the Commander of the VRS forces in Višegrad, later to be named the 1st Višegrad Light Infantry Brigade. From 12 December 1992 through November 1996, he was the Commander of the 1st Zvornik Light Infantry Brigade (Zvornik Brigade). Units from his brigade were involved in the actual capture of the Srebrenica "safe area". His brigade later participated in heavy fighting with the Bosnian Muslim column retreating from the "safe area" towards Tuzla. He was promoted to General-Major in June 1997 and was a member of the VRS General Staff until he was relieved in April 1998.

13. During the VRS attack on the Srebrenica "safe area" and the subsequent killings and executions of Bosnian Muslim men, **VINKO PANDUREVIĆ** was a Lt. Colonel in command of the Zvornik Brigade. As a brigade commander, he was responsible for planning and directing the activities of all the subordinate formations of his brigade, in accordance with the directives received from his higher command at the Corps level.

14. **MILORAD TRBIĆ** was born on 22 February 1958 in the village of Ponijevo, in Zenica. He performed regular service with the Yugoslav National Army (JNA) between 1977 and 1978. With the outbreak of war in Bosnia, he joined the Army of Republika Srpska (VRS). In 1993, he was appointed to the position of Deputy Commander of the 3rd Battalion of the Zvornik Brigade. He was later transferred to the security organ of the Zvornik Brigade. In July of 1995, he held the rank of reserve Captain. He held this position for the remainder of the period relevant to this Indictment.

15. During the events described in this Indictment, **MILORAD TRBIĆ** was an assistant to and directly reported to Lieutenant Drago Nikolić, the Chief of Security of the Zvornik Brigade. **MILORAD TRBIĆ** held the official rank of reserve Captain.

16. As an assistant to Lieutenant Drago Nikolić, **MILORAD TRBIĆ** was responsible for helping Drago Nikolić conduct the affairs of the Zvornik Brigade Security organ. These responsibilities included assisting Drago Nikolić in monitoring enemy activities; drafting proposals to the Brigade Commander in response to security threats posed by the

enemy and for the best use of the Military Police Company; and overseeing the activities of the Zvornik Brigade Military Police Company.

GENERAL ALLEGATIONS

17. At all times relevant to this indictment, a state of armed conflict existed in the Republic of Bosnia and Herzegovina.

18. At all relevant times, **VINKO PANDUREVIĆ** and **MILORAD TRBIĆ** were required to abide by the laws and customs governing the conduct of war.

19. All acts and omissions charged as crimes against humanity were part of a widespread or systematic attack directed against the Bosnian Muslim civilian population of Srebrenica and its surroundings.

INDIVIDUAL CRIMINAL RESPONSIBILITY

20. **VINKO PANDUREVIĆ** and **MILORAD TRBIĆ** are individually responsible for the crimes alleged against them in this indictment, pursuant to Article 7(1) of the Tribunal Statute. Individual criminal responsibility includes committing, planning, instigating, ordering or otherwise aiding and abetting in the planning, preparation or execution of any crimes referred to in Articles 2 to 5 of the Tribunal Statute.

21. **VINKO PANDUREVIĆ** is also, or alternatively, criminally responsible as a commander for the acts of his subordinates pursuant to Article 7(3) of the Tribunal Statute. Such criminal responsibility is the responsibility of a superior for the acts of his subordinate if he knew or had reason to know that his subordinate was about to commit such acts or had done so and the superior failed to take the necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof.

22. These allegations concerning individual criminal responsibility are realleged and incorporated into each of the charges set forth below.

CHARGES

COUNT 1 (Genocide)

23. Between about 11 July 1995 and 1 November 1995, **VINKO PANDUREVIĆ**, intending to destroy a part of the Bosnian Muslim people as a national, ethnical, or religious group:

- (a) killed members of the group, and
- (b) caused serious bodily or mental harm to members of the group.

24. Between about 11 July 1995 and 1 November 1995, **VINKO PANDUREVIĆ**, planned, instigated, ordered or otherwise aided and abetted in the planning, preparation or execution of the opportunistic killings of captured Bosnian Muslim men from the Srebrenica "safe area" by VRS military personnel.

25. Between about 11 July 1995 and 1 November 1995, **VINKO PANDUREVIĆ**, **MILORAD TRBIC**, and others, planned, instigated, ordered or otherwise aided and abetted in the planning, preparation or execution of a planned and organised mass execution of thousands of captured Bosnian Muslim men from the Srebrenica "safe area".

26. The wide-scale and organised killing of Bosnian Muslim men, which occurred in several different locations in and around the Srebrenica enclave, from 11 July 1995 until 18 July 1995, included:

26.1 **Potočari:** Between 12 July 1995 and 13 July 1995, VRS military personnel from the Bratunac Brigade, under the command of Radislav Krstić, summarily executed Bosnian Muslim men at diverse locations around the UN compound at Potočari, where the Bosnian Muslim men had taken refuge.

26.2 **Kravica:** On or about 13 July 1995, VRS soldiers, under the command of Radislav Krstić, summarily executed hundreds of Bosnian Muslim men who had been imprisoned in a large warehouse in the village of Kravica. The VRS soldiers used automatic weapons, hand grenades and other weaponry to kill the Bosnian Muslims inside the warehouse.

26.3 **Bratunac:** Between 12 July 1995 and 14 July 1995, VRS military personnel, under the command of Radislav Krstić, transported many of the Bosnian Muslims who had been detained in Potočari or captured along the Bratunac-Miliči road to locations in and around Bratunac, where they were held in schools, buildings and vehicles parked along the road. Between 12 July 1995 and 15 July 1995, VRS military personnel, under the command of Radislav Krstić, participated in numerous opportunistic killings of the detained Bosnian Muslim men at various locations throughout Bratunac.

26.4 **Tišća:** On or about 12 July 1995 and 13 July 1995, VRS military personnel, under the command of Radislav Krstić, transported the Bosnian Muslim women and children, who had been separated from male members of their families in Potočari, to an area near Tišća village. Most of the Bosnian Muslim women and children driven to Tišća were permitted to cross into Bosnian Muslim territory. However, VRS military personnel, under the command of Radislav Krstić, identified and separated Bosnian Muslim men and some Bosnian Muslim women. On or about 12 July 1995 and 13 July 1995, the VRS military personnel forced selected Bosnian Muslim men and women to walk to a nearby school, where they were taunted and assaulted by VRS soldiers. On or about 13 July 1995 and 14 July 1995, VRS military personnel, under the command of Radislav Krstić, loaded 25 Bosnian Muslim men onto a truck, drove them to an isolated pasture, and summarily executed them.

26.5 **Orahovac (near Lažete):** In the late evening hours of 13 July and during the day of 14 July 1995, working together with other individuals and units, personnel from the Military Police Company of the Bratunac Brigade transported from in and around Bratunac to the Grbavci School in the village of Orahovac hundreds of Bosnian Muslim males who had surrendered or been captured from the column of men retreating from the Srebrenica enclave or who had been separated in Potočari. On 14 July 1995, VRS personnel, including members of the Military Police Company of the Zvornik Brigade, guarded and blindfolded the

Bosnian Muslim males detained at the Grbavci School. During the day of 14 July, **MILORAD TRBIĆ**, along with Zvornik Brigade Military Police, participated in the killing of 20 people in front of the gymnasium. In the early afternoon of 14 July 1995, VRS personnel from the Zvornik Brigade transported these Bosnian Muslim males from the school at Grbavci to a nearby field, where personnel, including members of the 4th Battalion of the Zvornik Brigade, ordered the prisoners off the trucks and summarily executed them with automatic weapons. **MILORAD TRBIĆ** assisted in loading the Muslim men onto the trucks to the execution sites and assisted in the executions by shooting Muslim men with his rifle. Approximately 1000 Bosnian Muslim males were killed. On 14 and 15 July 1995, members of the Zvornik Brigade Engineering Company used heavy equipment to bury the victims in mass graves at the execution site, while the executions continued. On the evening of 14 July 1995, lights from the engineering machinery illuminated the execution and burial sites during the executions. All the units and personnel of the Zvornik Brigade that participated in the events at Orahovac were under the command of **VINKO PANDUREVIĆ**.

26.6 **The "Dam" near Petkovci:** On or about 14 July 1995, VRS military personnel, under the command of Radislav Krstić, transported hundreds of Bosnian Muslim men from detention sites in Bratunac to the school at Petkovci. On 14 July 1995, VRS military personnel, under the command of **VINKO PANDUREVIĆ**, summarily executed Bosnian Muslims in and around this school. On or about the evening of 14 July 1995 and the early morning hours of 15 July 1995, VRS military personnel, under the command Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ**, transported several hundred Bosnian Muslim men from the school at Petkovci to an area below the "Dam" near Petkovci. These people were unloaded from vehicles, led in small groups to an open area, and summarily executed by VRS military personnel. **MILORAD TRBIĆ** was present at the Petkovic School and assisted in organising and supervising the detention and transportation of Muslim men to the execution site at the Petkovci Dam.

26.7 **Cerska Valley:** From on or about 14 July 1995 until about 21 July 1995, VRS military personnel, under the command of Radislav Krstić, transported over 100 Bosnian Muslim men to an area along a dirt road in the Cerska Valley, summarily executed them, and covered them with dirt.

26.8 **Pilica School:** Between 14 and 16 July 1995, VRS military personnel, under the command of Radislav Krstić, transported hundreds of Bosnian Muslim men from detention sites in Bratunac to the school at Pilica. VRS military personnel, under the command of Radislav Krstić, summarily executed many of the Bosnian Muslim men who were being detained at the Pilica school.

26.9 **Branjevo Military Farm:** On or about 16 July 1995, VRS military personnel, under the command of Radislav Krstić, transported hundreds of Bosnian Muslim men from the Pilica school to the Branjevo Military Farm. The Bosnian Muslim men were unloaded from buses, led in small groups to an open area, and summarily executed with automatic weapons by VRS soldiers from the 10th Sabotage Detachment and other units. On or about 16 and 17 July 1995, the VRS military personnel from the Engineering Unit of the Zvornik Brigade, under

the command of **VINKO PANDUREVIĆ** and Radislav Krstić, using brigade heavy equipment, buried hundreds of victims in a nearby mass grave.

26.10 **Pilica Cultural Centre:** On or about 16 July 1995, VRS military personnel, under the command of Radislav Krstić, after participating in the Branjevo Military Farm executions, travelled a short distance to the village of Pilica. There, using automatic weapons and hand grenades, VRS military personnel summarily executed approximately 500 Bosnian Muslim men inside the Pilica Cultural Centre.

26.11 **Kozluk:** On or about 15 July 1995, VRS military personnel, under the command of Radislav Krstić, transported hundreds of Bosnian Muslim men to an isolated place near Kozluk and summarily executed them. On or about 16 July 1995, VRS military personnel from the Engineer Company of the Zvornik Brigade, under the command of Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ** using brigade heavy equipment, buried the victims in a mass grave nearby. **MILORAD TRBIĆ** was present at the Kozluk execution site on 15 July 1995.

27. During and after the opportunistic killings and mass executions which occurred from 11 July until 1 November 1995, Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ** failed to investigate or punish any of their VRS subordinates who were responsible for the killings and executions. To the contrary, Radislav Krstić and **VINKO PANDUREVIĆ**, and units under their command, participated in an organised and comprehensive effort to conceal and cover up the killings and executions by burying the bodies of the victims in isolated sites scattered throughout a wide area.

28. When it became apparent that the international community had learned of the killings and executions arising from the attack on the Srebrenica "safe area", Ratko Mladić, Radislav Krstić and **VINKO PANDUREVIĆ**, and units under their command, participated in a second attempt to conceal the killings and executions by digging up the bodies from the initial mass graves and transferring them to secondary graves. VRS military personnel or their agents, under the command of Radislav Krstić and **VINKO PANDUREVIĆ**, dug up the following graves listed below in subparagraphs 28.1 through 28.5, and transferred the bodies to secondary sites:

- 28.1 The Dam near Petkovci.
- 28.2 Orahovac.
- 28.3 Branjevo Military Farm.
- 28.4 Kozluk.
- 28.5 Glogova.

29. **MILORAD TRBIĆ** assisted in organising, supervising and carrying out the operation to re-bury the bodies of Muslim victims murdered in the Zvornik Brigade zone of responsibility as described above.

By his respective acts and omissions described in paragraphs 23 through 28, **VINKO PANDUREVIĆ** committed:

Count 1: Genocide, punishable under Articles 4(3)(a), and 7(1) and 7(3) of the Statute of the Tribunal; and

COUNT 2
(Conspiracy to Commit Genocide)

By his respective acts and omissions described in paragraphs 23 through 28, **VINKO PANDUREVIĆ** committed:

COUNT 2: Conspiracy to commit genocide, punishable under Articles 4(3)(b) and 7(1) of the Statute of the Tribunal.

30. **VINKO PANDUREVIĆ** entered an agreement with several others, including General Ratko Mladić, the Commander of the VRS, General Milenko Živanović, Commander of the Drina Corps through about 2000 hours on 13 July 1995; General Radislav Krstić, Chief of Staff/Deputy Commander through about 2000 hours on 13 July 1995 and, thereafter, Commander of the Drina Corps; Colonel Ljubiša Beara, Colonel Vujadin Popović, Assistant Commander for Security of the Drina Corps, Lieutenant Drago Nikolić, the Zvornik Brigade Security Officer, Colonel Vidoje Blagojević, Commander of the Bratunac Brigade and others, to kill the Muslim men from Srebrenica separated at Potočari or captured or having surrendered from the column and others and to cause serious bodily or mental harm to the Muslims of Srebrenica.

30.1. **VINKO PANDUREVIĆ** entered this agreement with the intent to kill the Muslim men of Srebrenica and to cause serious bodily or mental harm to the Muslims of Srebrenica, and in furtherance of the intent to destroy, in part, that national, ethnical, racial, or religious group of the Bosnian Muslims, as such.

30.2. The conduct of **VINKO PANDUREVIĆ** met the requisite elements of Conspiracy to Commit Genocide, namely that:

- a) The accused entered into an agreement between two or more persons to commit the crime of genocide;
- b) The accused intended to commit genocide.

In addition, the accused himself committed acts in furtherance of the conspiracy, including but not limited to the following:

- a) On 15 July, in an interim daily combat report to the Command of the Drina Corps, the accused told his superiors that his units were involved in securing and burying hundreds of prisoners held in the Zvornik Brigade zone of responsibility and that if he did not received assistance in this operation he would release the remaining prisoners held in schools around Zvornik.

And,

COUNT 3
(Extermination)

By his respective acts and omissions described in paragraphs 23 through 28, **VINKO PANDUREVIĆ** committed:

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

COUNTS 4 and 5
(Murder)

By their respective acts and omissions described in paragraphs 23 through 29, **VINKO PANDUREVIĆ** and **MILORAD TRBIĆ** committed:

COUNT 4: Murder, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(a), and 7(1) and for **VINKO PANDUREVIĆ** 7(3) of the Statute of the Tribunal.

By his respective acts and omissions described in paragraphs 21 through 26, **VINKO PANDUREVIĆ** committed:

COUNT 5: Murder, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3, and 7(1) and 7(3) of the Statute of the Tribunal, as recognised by Article 3(1)(a) of the Geneva Convention.

COUNT 6
(Persecutions)

31. Beginning on 11 July 1995 and continuing through 1 November 1995, Radislav Krstić and **VINKO PANDUREVIĆ** committed, planned, instigated, ordered, or otherwise aided and abetted the planning, preparation, or execution of a crime against humanity, that is, the persecutions of Bosnian Muslim civilians on political, racial, or religious grounds, in Srebrenica and its surroundings.

32. The crime of persecutions was perpetrated, executed, and carried out by or through the following means:

- 32.1. the murder of thousands of Bosnian Muslim civilians, including men, women, children, and elderly persons;
- 32.2. the cruel and inhumane treatment of Bosnian Muslim civilians, including severe beatings;
- 32.3. the terrorising of Bosnian Muslim civilians;
- 32.4. the destruction of personal property of Bosnian Muslims; and,
- 32.5. the deportation or forcible transfer of Bosnian Muslims from the Srebrenica enclave.

By these acts or omissions, and the acts and omissions described in paragraphs 4, 6, 7, 11, and 23 through 29, **VINKO PANDUREVIĆ** committed:

COUNT 6: Persecutions on political, racial and religious grounds, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(h), and 7(1) and 7(3) of the Statute of the Tribunal.

COUNT 7
(Forcible Transfer, Inhumane Acts)

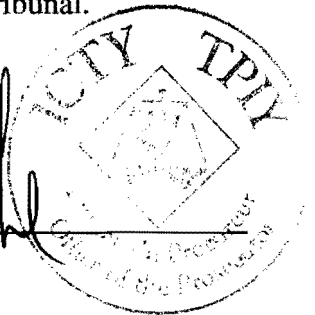
33. Beginning on 11 July 1995 and continuing through 13 July 1995, Radislav Krstić and **VINKO PANDUREVIĆ** committed, planned, instigated, ordered, or otherwise aided and abetted the planning, preparation, or execution of a crime against humanity, that is, the forcible transfer of Bosnian Muslims from the Srebrenica enclave.

By his respective acts and omissions described in paragraphs 4, 6, 7, 11, 26.1, 26.3, 26.4, 26.5, 26.6, 26.8, 26.9, and 26.11, **VINKO PANDUREVIĆ** committed:

COUNT 7: Inhumane acts (forcible transfer), a **CRIME AGAINST HUMANITY**, punishable under Article 5(i), and 7(1) and 7(3) of the Statute of the Tribunal.



Carla Del Ponte
Prosecutor



Dated this 10th day of February 2005
The Hague,
The Netherlands

Attachment AMEMBERS OF THE JOINT CRIMINAL ENTERPRISE AND THE MILITARY
STRUCTURE OF THE ARMY OF THE REPUBLIKA SRPSKA ("VRS")Members of the Joint Criminal Enterprise

1. Other members of this Joint Criminal Enterprise included: RS President Radovan Karadžić; General Ratko Mladić, the Commander of the VRS, General Milenko Živanović, Commander of the Drina Corps through about 2000 hours on 13 July 1995; General Radislav Krstić, Chief of Staff/Deputy Commander through about 2000 hours on 13 July 1995 and, thereafter, Commander of the Drina Corps; Colonel Petar Salapura, Chief of Intelligence of the Main Staff, Colonel Ljubiša Beara, Chief of Security of the Main Staff, Colonel Radoslav Janković, intelligence officer of the Main Staff, Major Dragomir Pećanac, Security officer of the Main Staff, Colonel Vidoje Blagojević, Commander of the Bratunac Brigade; Captain Momir Nikolić, Chief of Security and Intelligence, Bratunac Brigade, Colonel Vinko Pandurević, Commander of the Zvornik Brigade; Lieutenant Colonel Dragan Obrenović, Deputy Commander and Chief of Staff of the Zvornik Brigade; Lieutenant Colonel Rajko Krsmanović, Drina Corps Chief of Transportation Services; Colonel Lazar Aćamović, Drina Corps Assistant Commander for Rear Services; Ljubiša Borovčanin, Commander of the RS Ministry of Interior Special Police Brigade. Various other individuals and military and police units were involved in the operation to forcibly transfer and deport the Muslim populations of Srebrenica and Žepa, including but not limited to the following:

Drina Corps Units

Elements of the Drina Corps Military Police
 Elements of the Bratunac Brigade
 Elements of the Zvornik Brigade
 Elements of the Milići Brigade
 Elements of the Vlasenica Brigade
 Elements of the Višegrad Brigade
 Elements of the Rogatica Brigade
 Elements of the Birač Brigade
 Elements of the 2nd Romanija Brigade
 Elements of the Skelani Separate Battalion

Main Staff Units

Elements of the 10th Sabotage Detachment
 Elements of the 65th Protection Regiment

MUP Units

Elements of the RS "Special Police" Brigade
 Elements of the Bratunac Municipal Police
 Elements of the Zvornik Municipal Police

Following is a detailed summary of the military structure of the VRS, along with an organisation chart of the VRS Main Staff.

Military Structure of the Army of the Republika Srpska (“VRS”)

2. The Armed Forces of the Republika Srpska consisted of the Army of the Republika Srpska, and the units of the Ministry of Interior of the Republika Srpska.
3. In July 1995, the Armed Forces of the Republika Srpska were under the command and control of the Commander-in-Chief, Radovan Karadžić. His headquarters was in Pale.
4. Within the framework of the VRS, immediately subordinate to the Commander-in-Chief, was the Main Staff of the VRS, headquartered in Han Pijesak and commanded by General Ratko Mladić. It was the responsibility of the Commander of the Main Staff to issue regulations, orders and instructions regarding the implementation of orders by the Commander-in-Chief, and to discharge the command duties delegated to him by the Commander-in-Chief. The Main Staff of the VRS consisted of staff officers and staff-support personnel, as well as some specialised military units such as: the 65th Protection Regiment, designed to provide protection and combat services for the Main Staff; and the 10th Sabotage Detachment, a unit trained for operations behind enemy lines and other special combat assignments.
5. The vast majority of the fighting force of the VRS itself was divided into six geographically-based Corps, all subordinate to, and under the command of, General Mladić and, in turn, the Commander-in-Chief, Radovan Karadžić. In July 1995, the six Corps was the Drina Corps, the 1st Krajina Corps, the 2nd Krajina Corps, the Sarajevo-Romanija Corps, the Hercegovina Corps and the East Bosnia Corps.
6. Each of the above six Corps had their own individual commander and command staff, all of whom were directly subordinate to General Mladić in the VRS chain of command.
7. Milenko Živanović was appointed the first commander of the Drina Corps when it was formed on 1 November 1992 and served as the Drina Corps Commander until about 2000 hours on 13 July 1995 when he was replaced by General Krstić. General Radislav Krstić was the Commander of the Drina Corps from about 2000 hours on 13 July 1995 through to the end of the war. Prior to his promotion to Commander, General Radislav Krstić was Chief of Staff/Deputy Commander of the Drina Corps, a position he had held since October 1994.
8. The position of Chief of Staff/Deputy Commander of the Main Staff, Drina Corps or any Drina Corps brigade was a concurrent position. In the event that the Commander was absent, incapacitated, or otherwise unavailable to exercise his command functions, the Chief of Staff/Deputy Commander was empowered automatically and without further authorisation to assume and to exercise command authority over subordinate units, within the framework of the Commander’s overall intent. In such circumstances, the position of Chief of Staff/Deputy Commander is a position of superior responsibility within the meaning of Article 7(3) of the Tribunal Statute and, in addition, a person holding this position may be criminally liable under Article 7(1) of the Tribunal Statute.

B. 1st Zvornik Infantry BrigadeCommand StaffSubordinate Units

1st Infantry Battalion
 2nd Infantry Battalion
 3rd Infantry Battalion
 4th Infantry Battalion
 5th Infantry Battalion
 6th Infantry Battalion
 7th Infantry Battalion
 8th Infantry Battalion
 Reserve Battalion
 Rear Battalion
 Mixed Artillery Battalion
 Armour-Mechanised Company
 Military Police Company
 Light Anti-Aircraft Company
 Engineering Company
 Podrinje Detachment (Drina Wolves)
 Signal Platoon

12. Each brigade staff was headed by the Brigade Chief of Staff/Deputy Commander. The structure and function of the brigade staff was basically the same as the Corps staff, but operated on a smaller scale.
13. With respect to these brigade staffs, one significant difference pertains to the role of the security branch. In a light infantry brigade structure, the role of the Assistant Commander for Security Affairs and Intelligence is combined. In a regular infantry brigade structure, the position of Assistant Commander for Security Affairs and the Chief of Intelligence are separate.
14. In addition to the Bratunac, Zvornik and Vlasenica Brigades, units from the VRS Main Staff, other VRS Corps units, and RS Ministry of Interior "Special Police" and regular municipal police forces were present in the area of responsibility of the Drina Corps during the time frame set forth in the indictment. These units specifically were:
 - (1) Elements of the 65th Protection Regiment (Main Staff VRS)
 - (2) Elements of the 10th Sabotage Detachment (Main Staff VRS)
 - (3) Elements of the RS "Special Police" (Ministry of the Interior)
 - (4) Zvornik Police (Ministry of Interior)
 - (5) Vlasenica Police (Ministry of Interior)
 - (6) Milići Police (Ministry of Interior)
 - (7) Bratunac Police (Ministry of Interior)
 - (8) Skelani Police (Ministry of Interior)
 - (9) Višegrad Police (Ministry of Interior)
 - (10) Rogatica Police (Ministry of Interior)
15. All of the entities referred to in the preceding five paragraphs were units of the VRS or units of the RS Ministry of Interior, all legally organised and existing under the

9. The Drina Corps staff was headed by the Chief of Staff, as described in the preceding paragraph. The command staff, headquartered in Vlasenica, had three specialised branch bodies each headed by Assistant Commanders. Those specialised branches were the Corps Security Affairs Branch, the Corps Morale, Legal and Religious Affairs Branch, and the Rear Services (or Logistics) Branch. Along with the specialised branches named above, the Corps staff had approximately ten operative branches responsible for the day-to-day planning, operations and combat functions of the Corps. Those branches included the Operations and Training Department, the Intelligence Department, the Armour and Mechanised Forces Department, the Nuclear, Chemical and Biological Defence Department, the Engineering Department, the Artillery and Missile Department, the Communications Department, the Anti-Aircraft Defence Department, the Personnel Administration Department and the Electronic Security Department.
10. The Drina Corps consisted of approximately 15,000 soldiers organised into thirteen geographically-based subordinate units, which included the 1st Zvornik Infantry Brigade, the 1st Vlasenica Light Infantry Brigade, the 1st Birač Light Infantry Brigade, the 1st Milići Light Infantry Brigade, the 1st Bratunac Light Infantry Brigade, the 2nd Romanija Motorised Brigade, the 1st Podrinje Light Infantry Brigade, the 5th Podrinje Light Infantry Brigade, the 5th Mixed Artillery Regiment, the 5th Military Police Battalion, the 5th Engineer Battalion, the 5th Communications Battalion, and the Skelani Separate Infantry Battalion.
11. Each of the brigades, regiments and battalions mentioned in the preceding paragraph had their own command staff and numerous subordinate units designated as battalions, companies and platoons. The command and troops of the Bratunac and Zvornik Brigades of the Drina Corps played significant roles in the crimes charged herein. The command structure of those brigades is set forth below:

A. 1st Bratunac Light Infantry Brigade

Command Staff

Subordinate Units

1st Infantry Battalion
2nd Infantry Battalion
3rd Infantry Battalion
4th Infantry Battalion
Reserve Battalion
Mixed Artillery Battery
Engineer Platoon
Military Police Platoon
Intervention Platoon (Red Berets)

relevant laws of the RS, and under the command of individuals lawfully appointed under the relevant laws of the RS.

16. The geographic area of the Srebrenica enclave fell entirely within the area of responsibility of the VRS Drina Corps. (*See Attachments B and C*). Specifically, the Srebrenica enclave was in the territory under the responsibility of the 1st Bratunac Light Infantry Brigade, the 1st Milići Light Infantry Brigade and the Skelani Separate Battalion. Further, all of the criminal acts charged occurred within the area of responsibility of the Drina Corps, principally in the areas of responsibility of the 1st Zvornik Brigade, the 1st Milići Light Infantry Brigade and the 1st Bratunac Light Infantry Brigade.

ATTACHMENT B

**Map of the Drina Corps
Area of Responsibility
11 July 1995**

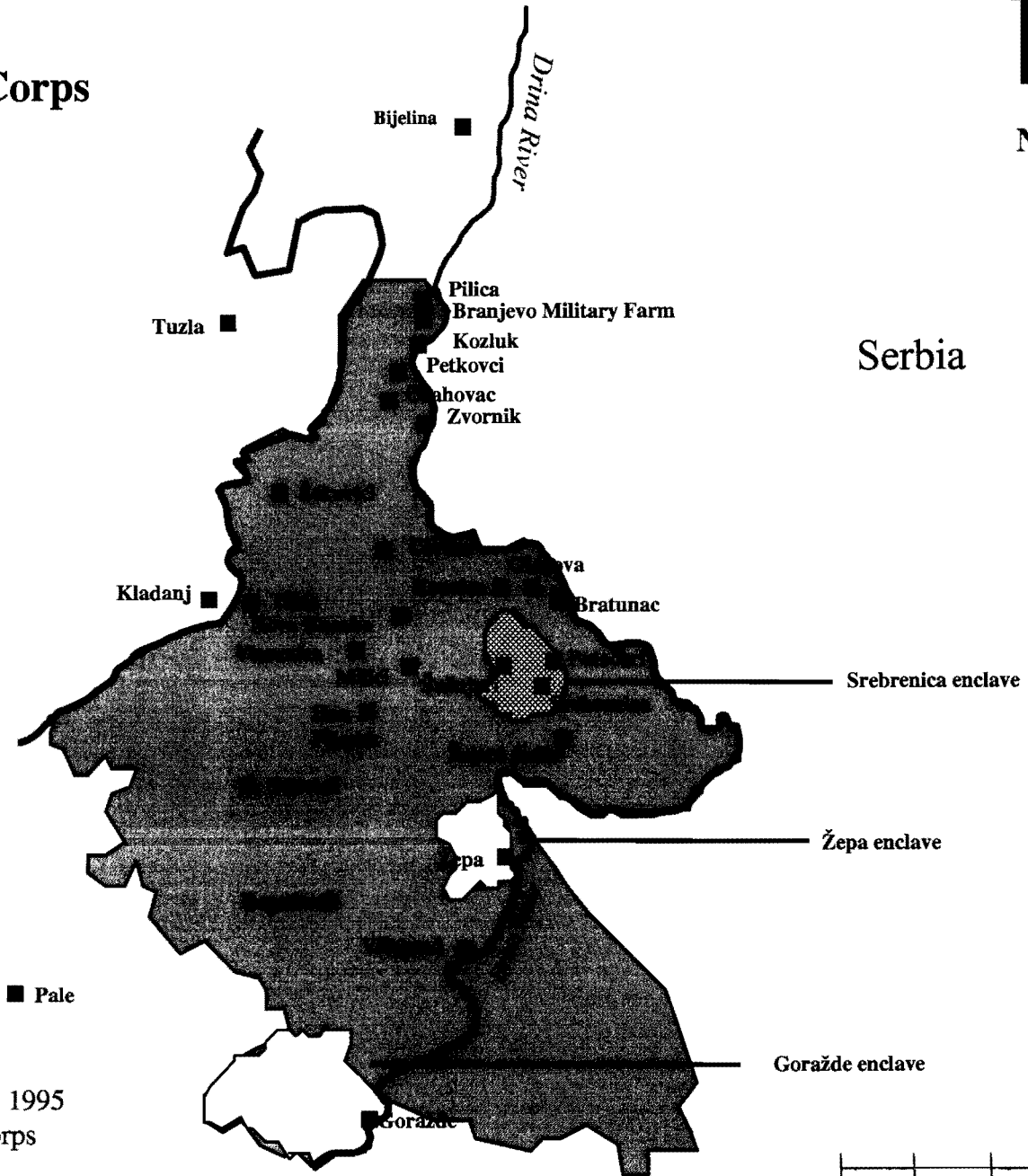





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ATTACHMENT C

**Close-up Map of the Drina Corps
Area of Responsibility
11 July 1995**



-  Approximate Confrontation Line - July 1995
-  Area of Responsibility - VRS Drina Corps
-  UN Enclaves

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