

THE INTERNATIONAL CRIMINAL TRIBUNAL FOR THE FORMER YUGOSLAVIA

CASE NO. IT-01-50-I

THE PROSECUTOR OF THE TRIBUNAL

AGAINST

SLOBODAN MILOSEVIC

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:

SLOBODAN MILOSEVIC

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

THE ACCUSED:

1. Slobodan MILOSEVIC, son of Svetozar Milosevic, was born on 20 August 1941 in Pozarevac, in present-day Serbia. In 1964, he graduated from the Law Faculty of the University of Belgrade and began a career in management and banking. Until 1978, he held the posts of deputy director and later general director at *Tehnogas*, a major oil company in the Socialist Federal Republic of Yugoslavia ("SFRY"). Thereafter, he became president of *Beogradska banka* (*Beobanka*), one of the largest banks in the SFRY, a post he held until 1983.

2. Slobodan MILOSEVIC joined the League of Communists of Yugoslavia in 1959. In 1984, he became Chairman of the City Committee of the League of Communists of Belgrade. In 1986, he was elected Chairman of the Presidium of the Central Committee of the League of Communists of Serbia and was re-elected in 1988. On 16 July 1990, the League of Communists of Serbia and the Socialist Alliance of Working People of Serbia united, forming a new party named the Socialist Party of Serbia ("SPS"). On 17 July 1990, **Slobodan MILOSEVIC** was elected President of the SPS and has remained in that post until the present date, except during the period 24 May 1991 to 24 October 1992.

3. Slobodan MILOSEVIC was elected President of the Presidency of the then Socialist Republic of Serbia on 8 May 1989 and re-elected on 5 December 1989. After the adoption of a new Constitution, on 28 September 1990, the Socialist Republic of Serbia became the Republic of Serbia, and **Slobodan MILOSEVIC** was elected to the newly established office of President of the Republic of Serbia in multi-party elections, held in December 1990. He was re-elected to this office in elections held on 20 December 1992.

4. After serving two terms as President of the Republic of Serbia, **Slobodan MILOSEVIC** was elected President of the Federal Republic of Yugoslavia ("FRY") on 15 July 1997, beginning his official duties on 23 July 1997. Following his defeat in the Federal Republic of Yugoslavia's presidential election of September 2000, **Slobodan MILOSEVIC** relinquished his position on 6 October 2000.

INDIVIDUAL CRIMINAL RESPONSIBILITY

Article 7(1) of the Statute of the Tribunal

5. **Slobodan MILOSEVIC** is individually criminally responsible for the crimes referred to in Articles 2, 3, and 5 of the Statute of the Tribunal and described in this indictment, which he planned, instigated, ordered, 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 any of the crimes charged personally. Committing in this indictment refers to participation in a joint criminal enterprise as co-perpetrator.

6. **Slobodan MILOSEVIC** participated in a joint criminal enterprise as set out in paragraphs 24 to 26. The purpose of this joint criminal enterprise was the forcible removal of the majority of the Croat and other non-Serb population from the approximately one-third of the territory of the Republic of Croatia that he planned to become part of a new Serb-dominated state through the commission of crimes in violation of Articles 2, 3, and 5 of the Statute of the Tribunal. These areas included those regions that were referred to by Serb authorities and are hereinafter referred to as the "Serbian Autonomous District /*Srpska autonomna oblast*/ ("SAO") Krajina", the "SAO Western Slavonia", and the "SAO Slavonia, Baranja and Western Srem" (collectively referred to by Serb authorities after 19 December 1991 as the "Republic of Serbian Krajina /*Republika Srpska krajina*" ("RSK")), and "Dubrovnik Republic /*Dubrovačka republika*".

7. This joint criminal enterprise came into existence before 1 August 1991 and continued until at least June 1992. Individuals participating in this joint criminal enterprise included **Slobodan MILOSEVIC**, Borisav JOVIC, Branko KOSTIC, Veljko KADIJEVIC, Blagoje ADZIC, Milan BABIC, Milan MARTIC, Goran HADZIC, Jovica STANISIC, Franko SIMATOVIC, also known as "Frenki", Tomislav SIMOVIC, Vojislav SESELJ, Momir BULATOVIC, Aleksandar VASILJEVIC, Radovan STOJICIC, also known as "Badza", Zeljko RAZNATOVIC, also known as "Arkan", and other known and unknown participants.

8. The crimes enumerated in Counts 1 to 32 of this indictment were within the object of the joint criminal enterprise. Alternatively, the crimes enumerated in Counts 1 to 13 and 17 to 32 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.

9. In order for the joint criminal enterprise to succeed in its objective, **Slobodan MILOSEVIC** worked in concert with or through several individuals in the joint criminal enterprise. Each participant or co-perpetrator within the joint criminal enterprise played his own role or roles that significantly contributed to the overall objective of the enterprise. The roles of the participants or co-perpetrators include, but are not limited to, the following:

10. Borisav JOVIC, holding different positions as a member, Vice-President, and President of the

SFRY Presidency from 15 May 1989 until April 1992, as President of the SPS from May 1991 until October 1992, and holding other key positions of the SPS until November 1995, and Branko KOSTIC, the Vice-President and then Acting President of the SFRY Presidency in the relevant period, together with others, commanded, directed, or otherwise exercised effective control over the Yugoslav People's Army ("JNA") and the Territorial Defence ("TO") units and the volunteer units acting in co-ordination and under supervision of the JNA.

11. General Veljko KADIJEVIC, as Federal Secretary for National Defence from 15 May 1988 until 6 January 1992, commanded, directed, or otherwise exercised effective control over the JNA and the TO units and the volunteer units acting in co-ordination and under supervision of the JNA.

12. General Blagoje ADZIC, in his capacity as JNA Chief-of-Staff from October 1989 until 8 May 1992 and Acting Federal Secretary for National Defence from January 1992 until 8 May 1992, together with others commanded, directed, or otherwise exercised effective control over the JNA and the TO units and the volunteer units acting in co-ordination and under supervision of the JNA.

13. General Aleksandar VASILJEVIC, in his capacity as a JNA general and chief of the JNA Security Administration until 8 May 1992, in particular the military counter-intelligence service *Kontraobavestajna sluzba* ("KOS"), participated in activities designed to stir up hate, fear and violence, which significantly helped attain the overall objectives of the joint criminal enterprise. Agents of the KOS directed and supported the local Croatian Serb political leaders and the local Serb police and military forces, including the TO staff and volunteers from Serbia.

14. Jovica STANISIC, in his capacity as chief of the State Security (*Drzavna bezbednost*) ("DB") of the Republic of Serbia from March 1991 until October 1998, commanded, directed, or otherwise exercised effective control over members of the DB, who participated in the perpetration of the crimes specified in this indictment. In addition, he provided arms, funds, training, or other substantial assistance or support to Serb volunteer units and police units who perpetrated crimes specified in this indictment.

15. Franko SIMATOVIC, also known as "Frenki", as head of the special operations component of the DB of the Republic of Serbia, commanded, directed, or otherwise exercised effective control over agents of the DB who perpetrated crimes specified in this indictment. In addition, he provided training, funds, arms, or other substantial assistance or support to members of "Martić's Police" and Serb volunteer units who perpetrated crimes specified in this indictment.

16. Tomislav SIMOVIC, in his position as Minister of Defence of the Republic of Serbia from 31 July 1991 until at least 19 December 1991, formed, deployed, and provided substantial assistance or support to Serb volunteer units and other Serb forces involved in the perpetration of crimes specified in this indictment.

17. Milan MARTIC, as "Secretary of the Secretariat of Internal Affairs" of the SAO Krajina from 4 January 1991 until 29 May 1991; as "Minister of Defence" of the SAO Krajina from 29 May 1991 until 27 June 1991; and as "Minister of Internal Affairs" for the SAO Krajina (later Republic of Serbian Krajina) from 27 June 1991 until January 1994, established, commanded, directed, and otherwise exercised effective control over members of his police force (referred to as "Martić's Police", "*Marticevci*", "SAO Krajina Police" or "SAO Krajina Militia").

18. Milan BABIC, as "President of the Executive Council" of the SAO Krajina from at least 19 January 1991 until 29 May 1991, "President of the Government" of the SAO Krajina from 29 May

1991 until December 1991, and as "President of the Republic" of the Republic of Serbian Krajina from 19 December 1991 until 26 February 1992, organised and administered the actions of the joint criminal enterprise in the SAO Krajina.

19. Goran HADZIC, in his capacity as "President of the Serbian National Council" of the SAO Slavonia, Baranja and Western Srem (SBWS) from 17 March 1991 until at least 25 September 1991, "President of the Government" of the SAO SBWS from at least 25 September 1991 until 26 February 1992, and then as "President of the Republic" of the Republic of Serbian Krajina until January 1994, established, commanded, directed, and otherwise exercised effective control over police (also known as Militia) units and the Serb National Security (SNB) of the SAO SBWS. He provided funding and other substantial assistance and support to the TO units of the SAO SBWS and the Republic of Serbian Krajina. In addition, he personally participated in crimes specified in paragraphs 50 to 55 in the indictment.

20. Radovan STOJICIC, also known as "Badza", previously the commander of a special police unit in Kosovo, on orders of **Slobodan MILOSEVIC**, went to Croatia in summer 1991 and established the Serb TO units of SBWS, whose members perpetrated crimes as described in this indictment. From early autumn 1991 until December 1991, he personally participated in these crimes as commander of the TO SBWS.

21. Zeljko RAZNATOVIC, also known as "Arkan", in 1990 established and commanded the Serbian Volunteer Guard, a volunteer unit commonly known as "*Arkanovci*" or "Arkan's Tigers", who were under the command of the TO of the SAO SBWS. During the time relevant to this indictment, they maintained a significant military base in Erdut, SAO SBWS, from where members of this unit participated in the crimes described in this indictment. This military base also served as the training centre of other TO units. Zeljko RAZNATOVIC himself functioned as the commander of the base in Erdut and personally participated in the crimes specified in paragraphs 50 to 51, 53 to 54, and 56 to 58 in the indictment.

22. Vojislav SESELJ, as President of the Serbian Radical Party (SRS) from at least February 1991 throughout the time relevant to this indictment recruited or otherwise provided substantial assistance or support to Serb volunteers, commonly known as "chetniks" (*cetnici*), "*Šešeljevci*" or "Sešelj's men", who perpetrated crimes as specified in this indictment. In addition, he openly espoused and encouraged creation of a "Greater Serbia" by violence and other unlawful means, and actively participated in war propaganda and spreading inter-ethnic hatred.

23. Momir BULATOVIC, as President of the Republic of Montenegro from 1990 until 1998, mobilised and provided substantial assistance to Montenegrin troops, including TO, police and volunteer units, who were deployed to the Republic of Croatia, forming part of the JNA, and who perpetrated crimes as specified in this indictment.

24. From 1987 until late 2000, **Slobodan MILOSEVIC** was the dominant political figure in Serbia. He acquired control of all facets of the Serbian government, including the police and other state security services. In addition, he gained control over the political leaders of Kosovo, Vojvodina, and Montenegro.

25. In his capacity as the President of Serbia and through his leading position in the SPS party, **Slobodan MILOSEVIC** exercised effective control or substantial influence over the above-listed participants in the joint criminal enterprise and either alone or acting in concert with them and additional known and unknown persons effectively controlled or substantially influenced the actions

of the Federal Presidency of the SFRY and later the FRY, the Serbian Ministry of Internal Affairs ("MUP"), the JNA, the Serb-run TO staff in the territories subject to this indictment as well as Serb volunteer groups.

26. Slobodan MILOSEVIC, acting alone and in concert with other members of the joint criminal enterprise, participated in the joint criminal enterprise in the following ways:

- a)** provided direction and assistance to the political leadership of the SAO SBWS, the SAO Western Slavonia, the SAO Krajina and RSK on the take-over of these areas and the subsequent forcible removal of the Croat and other non-Serb population.
- b)** provided financial, material and logistical support for the regular and irregular military forces necessary for the take-over of these areas and the subsequent forcible removal of the Croat and other non-Serb population.
- c)** directed organs of the government of the Republic of Serbia to create armed forces separate from the federal armed forces to engage in combat activities outside the Republic of Serbia, in particular in the said areas in Croatia and the subsequent forcible removal of the Croat and other non-Serb population.
- d)** participated in the formation, financing, supply, support and direction of special forces of the Republic of Serbia Ministry of Internal Affairs. These special forces were created and supported to assist in the execution of the purpose of the joint criminal enterprise through the commission of crimes which are in violation of Articles 2, 3 and 5 of the Statute of the Tribunal.
- e)** participated in providing financial, logistical and political support and direction to Serbian irregular forces and paramilitaries. Such support was given in furtherance of the joint criminal enterprise through the commission of crimes which are in violation of Articles 2, 3 and 5 of the Statute of the Tribunal.
- f)** participated in the planning and preparation of the take-over of the SAO SBWS, the SAO Western Slavonia, the SAO Krajina and the Dubrovnik Republic and the subsequent forcible removal of the Croat and other non-Serb population.
- g)** exerted effective control or substantial influence over the JNA which participated in the planning, preparation and execution of the forcible removal of the Croat and other non-Serb population from the SAO SBWS, the SAO Western Slavonia, the SAO Krajina and the Dubrovnik Republic.
- h)** provided financial, logistical and political support to TO units and Serb volunteer units acting in the SAO SBWS, the SAO Western Slavonia, the SAO Krajina and the Dubrovnik Republic, which assisted in the execution of the purpose of the joint criminal enterprise through the commission of crimes which are in violation of Articles 2, 3 and 5 of the Statute of the Tribunal.
- i)** effectively ordered the passage of laws and regulations relative to the involvement of the JNA, the TO and Serb volunteer units in Croatia.

j) directed, commanded, controlled, or otherwise provided substantial assistance or support to the JNA, the Serb-run TO staff, and volunteer forces deployed in the SAO SBWS, the SAO Western Slavonia, the SAO Krajina and the Dubrovnik Republic engaged in the execution of the purpose of the joint criminal enterprise through the commission of crimes which are in violation of Articles 2, 3 and 5 of the Statute of the Tribunal.

k) directed, commanded, controlled, or otherwise provided substantial assistance or support to the police forces within the MUP of the Republic of Serbia, including the DB, whose members assisted in the execution of the purpose of the joint criminal enterprise in the SAO SBWS, the SAO Western Slavonia, the SAO Krajina and the Dubrovnik Republic.

l) financed Serb military, police, and irregular soldiers in Croatia who perpetrated crimes as specified in this indictment.

m) controlled, contributed to, or otherwise utilised Serbian state-run media outlets to manipulate Serbian public opinion by spreading exaggerated and false messages of ethnically based attacks by Croats against Serb people in order to create an atmosphere of fear and hatred among Serbs living in Serbia and Croatia. The propaganda generated by the Serbian media was an important tool in contributing to the perpetration of crimes in Croatia.

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

28. The accused and other participants in the joint criminal enterprise shared the intent and state of mind required for the commission of each of the crimes charged in counts 1 to 32.

Article 7(3) of the Statute of the Tribunal

29. Slobodan MILOSEVIC, while holding positions of superior authority, is also individually criminally responsible for the acts or omissions of his 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 the necessary and reasonable measures to prevent such acts or to punish the perpetrators.

30. From at least March 1991 until 15 June 1992, **Slobodan MILOSEVIC** exercised control over the four members of the "Serbian Bloc" within the Presidency of the SFRY (later the FRY). These four individuals were Borisav JOVIC, the representative of the Republic of Serbia; Branko KOSTIC, the representative of the Republic of Montenegro; Jugoslav KOSTIC, the representative of the Autonomous Province of Vojvodina; and Sejdo BAJRAMOVIC, the representative of the Autonomous Province of Kosovo and Metohia. **Slobodan MILOSEVIC** used Borisav JOVIC and Branko KOSTIC as his primary agents in the Presidency, and through them, he directed the actions of the "Serbian Bloc". From 1 October 1991, in the absence of the representatives of the Presidency from Croatia, Slovenia, Macedonia, and Bosnia and Herzegovina, the four members of the "Serbian Bloc" exercised the powers of the Presidency, including that of collective "Commander-in-Chief" of

the JNA. This "Rump Presidency" acted without dissension to execute **Slobodan MILOSEVIC's** policies. The Federal Presidency had effective control over the JNA as its "Commander-in-Chief" and the TO units and volunteer units acting in co-ordination and under supervision of the JNA. Generals Veljko KADIJEVIC and Blagoje ADZIC, who directed and supervised the JNA forces in Croatia, were in constant communication and consultation with the accused.

31. Slobodan MILOSEVIC exercised effective control over KOS, the counterintelligence component of the JNA. His control over the leaders of KOS, particularly over General Aleksandar VASILJEVIC, enabled the engagement of KOS agents in Croatia. Agents of the KOS carried out the policies of **Slobodan MILOSEVIC** in Croatia by directing the actions of local Croatian Serb political leaders, directing and supporting the local Serb police and security forces, and introducing Serb volunteer groups into Croatia and supporting their activities.

32. Slobodan MILOSEVIC is therefore individually criminally responsible under Article 7 (3) of the Statute of the Tribunal for the participation of the members of the JNA, the TO units and the volunteer units acting in co-ordination and under supervision of the JNA in the crimes described in this indictment.

33. From the time **Slobodan MILOSEVIC** came to power in Serbia, he exercised control over key officials in the Serbian MUP, among them Radmilo BOGDANOVIC and Zoran SOKOLOVIC, who were both, at different times, Minister of Internal Affairs of Serbia, Radovan STOJICIC, the Deputy Minister of Internal Affairs, and Jovica STANISIC and Franko SIMATOVIC, both high-ranking officials in the DB. Through these officials, **Slobodan MILOSEVIC** exercised effective control over agents of the MUP and the DB who directed and supported the actions of local Croatian Serb political leaders, and Serb police and security forces, and introduced Serb volunteer groups into Croatia and supported their activities. The accused **Slobodan MILOSEVIC** is therefore individually criminally responsible under Article 7 (3) of the Statute of the Tribunal for the participation of the members of the Serbian MUP and the DB in the crimes described in this indictment.

THE CHARGES:

COUNT 1 (PERSECUTIONS)

34. From on or about 1 August 1991 until June 1992, **Slobodan MILOSEVIC**, acting alone or in concert with other known and unknown members of a joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the persecutions of the Croat and other non-Serb civilian population in the territories of the SAO SBWS, the SAO Western Slavonia, the SAO Krajina, and the Dubrovnik Republic.

35. Throughout this period, Serb forces, comprised of JNA units, local TO units and TO units from Serbia and Montenegro, local and Serbian MUP police units and paramilitary units, attacked and took control of towns, villages and settlements in these territories listed above. After the take-over, the Serb forces in co-operation with the local Serb authorities established a regime of persecutions designed to drive the Croat and other non-Serb civilian population from these territories.

36. These persecutions were based on political, racial or religious grounds and included the following:

- a. The extermination or murder of **hundreds** of Croat and other non-Serb civilians, including women and elderly persons, in Dalj, Erdut, Klisa, Lovas, Vukovar, Vocin, Bacin, Saborsko and neighbouring villages, Skabrnja, Nadin, Bruska, and Dubrovnik and its environs, as described in detail in paragraphs 38 to 59 and 73 to 75.
- b. The prolonged and routine imprisonment and confinement of **thousands** of Croat and other non-Serb civilians in detention facilities within and outside of Croatia, including prison camps located in Montenegro, Serbia, and Bosnia and Herzegovina, as described in detail in paragraph 64.
- c. The establishment and perpetuation of inhumane living conditions for Croat and other non-Serb civilian detainees within the mentioned detention facilities.
- d. The repeated torture, beatings and killings of Croat and other non-Serb civilian detainees in the mentioned detention facilities.
- e. The prolonged and frequent forced labour of Croat and other non-Serb civilians detained in the mentioned detention facilities or under house arrest in their respective homes in Vukovar, Dalj, Lovas, Erdut, Saborsko, Vocin and Tovarnik. The forced labour included digging graves, loading ammunition for the Serb forces, digging trenches and other forms of manual labour at the frontlines.
- f. The repeated sexual assaults of Croat and other non-Serb civilians by Serb soldiers during arrest and in the mentioned detention facilities.
- g. The unlawful attacks on Dubrovnik and undefended Croat villages throughout the territories specified above.
- h. The imposing of restrictive and discriminatory measures against the Croat and other non-Serb civilian population, such as restriction of movement; removal from positions of authority in local government institutions and the police; dismissal from jobs; and arbitrary searches of their homes.
- i. The beating and robbing of Croat and other non-Serb civilians.
- j. The torture and beatings of Croat and other non-Serb civilians during and after their arrest.
- k. The deportation or forcible transfer of at least **170,000** Croat and other non-Serb civilians from the territories specified above, including the deportation to Serbia of at least **5,000** inhabitants from Ilok, **20,000** inhabitants from Vukovar; and the forcible transfer to locations within Croatia of at least **2,500** inhabitants from Erdut, as described in detail in paragraphs 67 to 69.
- l. The deliberate destruction of homes, other public and private property, cultural institutions, historic monuments and sacred sites of the Croat and other non-Serb population in Dubrovnik and its environs, Vukovar, Erdut, Lovas, Sarengrad, Bapska, Tovarnik, Vocin, Saborsko, Skabrnja, Nadin, and Bruska, as described in paragraphs 71 and 77 to 82.

37. By these acts and omissions, **Slobodan MILOSEVIC** committed:

Count 1: 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.

COUNTS 2 to 5
(EXTERMINATION, MURDER, WILFUL KILLING)

38. From 1 August 1991 until June 1992, **Slobodan MILOSEVIC**, acting alone or in concert with other known and unknown members of a joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the extermination, murder and wilful killings of Croat and other non-Serb civilians in the territories of the SAO Western Slavonia, the SAO Krajina, and the SAO SBWS, as specified in paragraphs 39 through 59 of this indictment.

SAO WESTERN SLAVONIA

39. Beginning August 1991, the Serb forces including the volunteer units "Seselj's men" and the "White Eagles" were in control of Vocin. On 13 December 1991, while the Serb forces withdrew from Vocin and the surrounding area, they went from house to house, killing a substantial portion of the remaining Croat civilian population. A total of thirty-two civilians were killed by these two units before they withdrew on 13 December 1991. The only survivors were those in hiding, whom the Serb forces did not find. The names of the victims are set out in Annex I attached to this indictment.

SAO KRAJINA

40. From about 7 October 1991, the Serb forces, comprised of the JNA, members of the TO and members of the Militia of the SAO Krajina (also known as the SAO Krajina Police and Martić's Police) were in control of the area of Hrvatska Kostajnica. Most of the Croat civilians had fled their homes during the attack in September 1991. Approximately 120 Croat civilians, mostly women, the elderly or the infirm, remained in the villages of Dubica, Cerovljani, and Bacin. On the morning of 20 October 1991, members of the Serb forces rounded up fifty-three civilians in Dubica and detained them in the village fire station. Over the course of the day and night ten were released, because they were either Serbs or had connections with Serbs. On 21 October 1991, the Serb forces took the remaining forty-three detained Croats to a location near the village of Bacin. In addition, the Serb forces brought at least thirteen non-Serb civilians from Bacin and Cerovljani to the same location. All fifty-six victims were killed there. At approximately the same time, the Serb forces took away an additional thirty civilians from Bacin and twenty-four from the villages Dubica and Cerovljani into an unknown location where they killed them. The names of the victims are set out in Annex I attached to this indictment.

41 From early August 1991 until 12 November 1991, the Croat villages of Saborsko, Poljanak and Lipovanic were attacked by Serb forces including JNA, TO and "Martić's Police". As soon as the Serb forces entered the villages, they killed all remaining non-Serb inhabitants they found.

42 On 28 October 1991, TO units entered Lipovanic and killed eight civilians. The names of the victims are set out in Annex I attached to this indictment.

43. On 7 November 1991, JNA and TO units, in particular a special JNA unit from Nis, entered the hamlet of Vukovici near Poljanak and executed nine civilians. The names of the victims are set out in Annex I attached to this indictment.

44. On 12 November 1991, members of the JNA, "Martić's Police" and the TO entered the village of Saborsko where they killed at least twenty Croat civilians. Afterwards, the village was leveled to the ground. The names of the victims are set out in Annex I attached to this indictment.

45. In November 1991, Serb forces comprised of JNA and TO units and "Martić's Police" attacked the village of Skabrnja, near Zadar. On 18 November 1991, the Serb forces entered Skabrnja. Moving from house to house, they killed at least thirty-eight non-Serb civilians in their homes or in the streets. The names of the victims are set out in Annex I attached to this indictment.

46. In addition, when Serb forces attacked the neighbouring villages of Nadin the next day, they killed seven non-Serb civilians. The names of the victims are set out in Annex I attached to this indictment.

47. Between 18 November and February 1992, all remaining Croat civilians in Skabrnja died. Serb forces killed twenty-six of the remaining elderly and infirm Croat civilians. The names of the victims are set out in Annex I attached to this indictment.

48. On 21 December 1991, Serb forces, in particular members of "Martić's Police", entered the village of Bruska and the hamlet of Marinovic where they killed ten civilians, among them nine Croats. The names of the victims are set out in Annex I attached to this indictment.

VUKOVAR HOSPITAL

49. On or about 20 November 1991, as part of the overall persecution campaign, Serb military forces under the command, control or influence of the JNA, the TO SBWS and other participants of the joint criminal enterprise, removed approximately two hundred and fifty-five Croats and other non-Serbs from Vukovar Hospital in the aftermath of the Serb take-over of the city. The victims were transported to the JNA barracks and then to the Ovcara farm located about 5 kilometers 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 Ovcara farm and Grabovo, where they shot and killed them. Their bodies were buried in a mass grave. The names of the victims are set out in Annex I attached to this indictment.

SAO SBWS

50. In September and October 1991, the Serb TO forces and Militia of the SAO SBWS arrested Croat civilians and kept them in a detention facility in the police building in Dalj. On 21 September 1991, Goran HADZIC and Zeljko RAZNATOVIC visited the detention facility and ordered the release of two of the detainees. Members of the TO of the SAO SBWS led by Zeljko RAZNATOVIC shot eleven detainees and buried their bodies in a mass grave in the village of Celija. The names of the victims are set out in Annex I attached to this indictment.

51. On 4 October 1991, members of the TO of the SAO SBWS led by Zeljko RAZNATOVIC

entered the detention facility in the police building in Dalj and shot **twenty-eight** Croat civilian detainees. The bodies of the victims were then taken from the building and dumped into the nearby Danube River. The names of the victims are set out in Annex I attached to this indictment.

52. On 18 October 1991, members of the JNA, the TO of the SAO SBWS, and Dusan Silni volunteer unit forced **fifty** Croat civilians, who had been detained for forced labour in the Zadruga building in Lovas, to march into a minefield on the outskirts of the village of Lovas, located approximately 20 kilometers south-west of the town of Vukovar. On the way to the minefield, **one** detainee was shot dead by these Serb forces. Upon reaching the minefield, the detainees were forced to enter the minefield and sweep their feet in front of them to clear the field of mines. At least one mine exploded, and the Serb forces opened fire on the detainees. **Twenty-one** detainees were killed either through mine explosions or gunfire. The names of the victims are set out in Annex I attached to this indictment.

53. On 9 November 1991, members of the TO of the SAO SBWS led by Zeljko RAZNATOVIC and members of the Militia of the SAO SBWS arrested ethnic Hungarian and Croat civilians in Erdut, Dalj Planina, and Erdut Planina and took them to the training centre of the TO in Erdut where **twelve** of them were shot dead the following day. The names of the victims are set out in Annex I attached to this indictment. Several days after 9 November 1991, members of the SNB of the SAO SBWS in co-operation with several members of "Arkan's Tigers" arrested and executed **three** civilians, two of them family members of the original Hungarian victims who had inquired about the fate of their relatives. The bodies of eight of the initial twelve victims were buried in the village of Celija and one victim was buried in Daljski Atar. The bodies of the three additional victims were thrown in a well in Borovo. The names of the victims are set out in Annex I attached to this indictment. On 3 June 1992, members of the SNB, in co-operation with members of "Arkan's Tigers", arrested Marija Senasi (born 1937), a female family member of the original Hungarian victims who had continued to make inquiries about the fate of her relatives. This woman was subsequently murdered and her body was thrown into an abandoned well in Dalj Planina.

54. On 11 November 1991, members of the TO of SAO SBWS, under the command of Zeljko RAZNATOVIC, arrested seven non-Serb civilians in the village of Klisa. Two of the detainees who had Serb relatives were released. The remaining **five** civilians were taken to the TO training centre in Erdut. After their interrogation, the victims were killed and buried in a mass grave in the village of Celija. The names of the victims are set out in Annex I attached to this indictment.

55. Between 18 and 20 November 1991, after the termination of the military operations in and around Vukovar, the JNA deported **thousands** of Croat and other non-Serb inhabitants into the territory of the Republic of Serbia. Following a request of Goran HADZIC to retain those non-Serbs who were suspected of participation in the military operations, the JNA transported a large number of inhabitants of Vukovar to the detention facilities in Dalj on around 20 November 1991. There, Serb TO members selected those suspected of participating in the defence of Vukovar. The selected detainees were interrogated, beaten and tortured. At least **thirty-four** were executed. The names of the victims are set out in Annex I attached to this indictment.

56. On 10 December 1991, members of the TO of the SAO SBWS led by Zeljko RAZNATOVIC and members of the Militia of the SAO SBWS arrested **five** non-Serb villagers from Erdut. The victims were taken to the TO training centre in Erdut and subsequently killed. The bodies of three of the victims were later disposed of in a well in Daljski Atar. The names of the victims are set out in Annex I attached to this indictment.

57. From 22 December 1991 to 25 December 1991, members of the TO of the SAO SBWS led by Zeljko RAZNATOVIC and members of the Militia of the SAO SBWS arrested seven ethnic Hungarian and Croat civilians in Erdut and took them to the TO training centre in Erdut. On 26 December 1991, they were shot and killed. The bodies of six of the victims were buried in Daljski Atar. The names of the victims are set out in Annex I attached to this indictment.

58. On 21 February 1992, members of the TO of the SAO SBWS led by Zeljko RAZNATOVIC and members of the Militia of the SAO SBWS arrested four non-Serb civilians in Erdut. All of the victims were interrogated in the Territorial Defence training centre in Erdut and then killed. The bodies of the victims were buried in a mass grave in Daljski Atar. The names of the victims are set out in Annex I attached to this indictment.

59. On 4 May 1992, members of the special operations component of the DB, arrested five non-Serb civilians in the village of Grabovac. The civilians were taken away and killed. Their bodies were later buried in Tikves Park. The names of the victims are set out in Annex I attached to this indictment.

60. By the acts and omissions in relation to the incidents referred to in the paragraphs 39 to 49, **Slobodan MILOSEVIC** committed:

Count 2: Extermination, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(b) and 7(1) and 7(3) of the Statute of the Tribunal.

61. By the acts and omissions in relation to all incidents referred to in the paragraphs 39 to 59, **Slobodan MILOSEVIC** committed:

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

62. By the acts and omissions in relation to all incidents referred to in the paragraphs 39 to 49, 52 to 59, **Slobodan MILOSEVIC** committed:

Count 5: Wilful killing, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(a) and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 6 to 13

(UNLAWFUL CONFINEMENT, IMPRISONMENT, TORTURE and INHUMANE ACTS)

63. From August 1991 until March 1992, **Slobodan MILOSEVIC**, acting alone or in concert with other known and unknown members of a joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the unlawful confinement or imprisonment under inhumane conditions of the Croat and other non-Serb civilian population in the territories of the SAO SBWS, the SAO Western Slavonia, the SAO Krajina, and the Dubrovnik Republic.

64. Serb military forces, comprised of JNA, TO and volunteer units acting in co-operation with local and Serbian police staff and local Serb authorities, arrested and detained **thousands** of Croat and other non-Serb civilians from the territories specified in the following short- and long-term detention facilities:

- a. Military warehouse in Morinje in Montenegro, run by the JNA, approximately **three hundred and twenty** detainees.
- b. Military barracks in Kumbor in Montenegro, a transit detention facility run by the JNA that also included **scores** of long-term detainees.
- c. Military barracks in Bileca in Bosnia and Herzegovina run by the JNA, approximately **one hundred** detainees.
- d. STAJICEVO agricultural farm in Serbia run by the JNA, approximately **one thousand and seven hundred** detainees.
- e. Military barracks in Begejci in Serbia run by the JNA, approximately **two hundred and sixty** detainees.
- f. Military barracks in Zrenjanin in Serbia run by the JNA, **scores** of detainees.
- g. Military prison Sremska Mitrovica in Serbia run by the JNA, **hundreds** of detainees.
- h. Prison in Knin, SAO Krajina run by the JNA, approximately **one hundred and fifty** detainees.
- i. Old hospital in Knin, SAO Krajina run by "Martić's Militia", approximately **one hundred and twenty** detainees.
- j. Police buildings and the hangar near the railway station in Dalj, SAO SBWS run by the JNA and TO, **hundreds** of detainees.
- k. Zadruga Building in Lovas, SAO SBWS run by members of the TO and the Dusan Silni volunteer unit, approximately **seventy** detainees.
- l. Territorial Defence training centre in Erdut, also referred to as "Arkan's" military base, SAO SBWS, run by members of the TO and "Arkan's Tigers", approximately **fifty-two** detainees.
- m. Ovcara farm, near Vukovar, SAO SBWS run by the JNA, approximately **three hundred** detainees.
- n. Velepromet warehouse near Vukovar, SAO SBWS run by the JNA, approximately **one hundred** detainees.
- o. Military prison in Sid, SAO SBWS run by the JNA, approximately **one hundred** detainees.

p. Police station in Opatovac, SAO SBWS run by the JNA, scores of detainees.

q. Stable or workshop in Borovo Selo, SAO SBWS, run by members of the militia and TO, approximately eighty detainees.

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

66. By these acts and omissions, **Slobodan MILOSEVIC** committed:

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

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

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

Count 9: Unlawful confinement, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949** punishable under Article 2(g) and Article 7 (1) and Article 7 (3) of the Statute of the Tribunal.

Count 10: Torture, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949** punishable under Article 2(b) and Article 7 (1) and Article 7 (3) of the Statute of the Tribunal.

Count 11: Wilfully causing great suffering, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949** punishable under Article 2(c) and Article 7 (1) and Article 7 (3) of the Statute of the Tribunal.

Count 12: 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 Article 3 and Article 7 (1) and Article 7 (3) of the Statute of the Tribunal.

Count 13: 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 Article 3 and Article 7 (1) and Article 7 (3) of the Statute of the Tribunal.

COUNTS 14 to 16 (DEPORTATION, FORCIBLE TRANSFER)

67. From 1 August 1991 until May 1992, **Slobodan MILOSEVIC**, acting alone or in concert with other known and unknown members of the joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the deportations or forcible transfers of the Croat and other non-Serb civilian population in the territories of the SAO SBWS, the SAO Western Slavonia, the SAO Krajina, and the Dubrovnik Republic.

68. In order to achieve this objective, Serb forces comprised of JNA, TO and volunteer units, including the "White Eagles", "Seselj's men", "Dusan Silni" and "Arkan's Tigers", in co-operation with police units, including "Martic's Police", SNB and Serbian MUP, and others under the effective control of **Slobodan MILOSEVIC** or other participants in the joint criminal enterprise, surrounded Croat towns and villages and demanded their inhabitants to surrender their weapons, including legally owned hunting rifles. Then, the town and villages were attacked, even those inhabitants who 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 and other non-Serb civilian population and forcibly transported them to locations in Croatia controlled by the Croatian government or deported them to locations outside Croatia, in particular Serbia and Montenegro. On other occasions, the 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 then deported or forcibly transferred.

69. According to the 1991 census, the Croat and other non-Serb population of these areas was approximately as follows:

SAO Krajina: 28 % Croats (70,708), 5 % others (13,101).

SAO Western Slavonia: 29 % Croats (6864), 11 % others (2577).

SAO SBWS: 47 % Croats (90,454), 21 % others (40,217).

Virtually the whole Croat and non-Serb population of these areas was forcibly removed, deported or killed. According to the 1991 census, the Croat and other non-Serb population of the Dubrovnik Republic was approximately 82 % Croats (58,836), 11 % others (7,818). The joint criminal enterprise did not achieve its goal of forcibly removing, deporting or killing the entire Croat and non-Serb population of the Dubrovnik Republic.

70. By these acts and omissions, **Slobodan MILOSEVIC** committed:

Count 14: Deportation, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 15: Inhumane Acts (Forcible Transfers), a **CRIME AGAINST HUMANITY**, punishable under Articles 5(i) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 16: Unlawful Deportation or Transfer, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(g) and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 17 to 20
(WANTON DESTRUCTION, PLUNDER OF PUBLIC OR PRIVATE PROPERTY)

71. From 1 August 1991 until May 1992, **Slobodan MILOSEVIC**, acting alone or in concert with other known and unknown members of the joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of the wanton

destruction and plunder of the public and private property of the Croat and other non-Serb population, within the territories of the SAO SBWS, the SAO Western Slavonia and the SAO Krajina although these actions 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, from August until October 1991: the towns and villages Dalj, Celija, Vukovar, Erdut, Lovas, Sarengrad, Bapska and Tovarnik.

SAO Western Slavonia, from August to December 1991: the town Vocin.

SAO Krajina, from August to December 1991: the towns and villages Saborsko, Skabrnja, Nadin, and Bruska.

72. By these acts and omissions, **Slobodan MILOSEVIC** committed:

Count 17: Extensive destruction and appropriation of property, not justified by military necessity and carried out unlawfully and wantonly, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(d) and 7(1) and 7 (3) of the Statute of the Tribunal.

Count 18: Wanton destruction of villages, or devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3 (b) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 19: Destruction or wilful damage done to institutions dedicated to education or religion, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 20: Plunder of public or private property, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(e) and 7(1) and 7(3) of the Statute of the Tribunal.

DUBROVNIK

COUNTS 21 to 27

(MURDER, WILFUL KILLING, WILFULLY CAUSING GREAT SUFFERING, CRUEL TREATMENT, ATTACKS ON CIVILIANS)

73. From 1 October 1991 until 7 December 1991, **Slobodan MILOSEVIC**, acting alone or in concert with other known and unknown members of the joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of a military campaign directed at the city of Dubrovnik and its surroundings in order to achieve the forcible removal of its non-Serb population.

74. In this time period, Serb forces comprised of JNA land, air and naval units, as well as TO and volunteer units and special police units from Serbia and Montenegro subordinated to the JNA and under the effective control of **Slobodan MILOSEVIC** and other members of the joint criminal enterprise, in particular Momir BULATOVIC, launched an extensive military attack on the coastal

regions of Croatia between the town of Neum, Bosnia and Herzegovina, in the north-west and the Montenegrin border in the south-east. It was the objective of the Serb forces to detach this area from Croatia and to annex it to Montenegro. While the Serb forces seized the territory to the south-east and north-west of the city of Dubrovnik within two weeks, the city itself was under attack throughout the time alleged in this indictment.

75. During an unlawful extensive shelling campaign conducted from high ground east and north of Dubrovnik, with an unobstructed view of the city and its environs, and from JNA naval vessels offshore, **forty-three** Croat civilians were killed and numerous others wounded. The shelling incidents and the names of the killed civilians are set out in Annex II attached to this indictment.

76. By these acts and omissions, **Slobodan MILOSEVIC** committed:

Count 21: Murder, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(a) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 22: Wilful killing, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(a) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 23: Murder, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 24: Inhumane acts, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(i) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 25: Wilfully causing great suffering, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(c) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 26: Cruel treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 27: Attacks on civilians, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 51(2) of Additional Protocol I and Article 13(2) of Additional Protocol II to the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 28 to 32
(WANTON DESTRUCTION, PLUNDER OF PUBLIC OR PRIVATE PROPERTY)

77. From 1 October 1991 until 7 December 1991, during this same shelling attack, **Slobodan MILOSEVIC**, acting alone or in concert with other known and unknown members of the joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation and execution of the wanton destruction or wilful damage and plunder of the public and private property of the Croat and other non-Serb population within the area of the Dubrovnik Republic. This campaign included the destruction, damage or plunder of homes, religious, historical and cultural buildings and other civilian public or private buildings, not justified

by military necessity.

78. During this shelling campaign, approximately 1000 shells fired by the Serb forces impacted in the Old Town area of the city. The Old Town district of Dubrovnik was an UNESCO World Cultural Heritage Site in its entirety. A number of the buildings in the Old Town and the towers on the city walls were marked with the symbols mandated by the Hague Convention on the Protection of Cultural Property in the Event of Armed Conflict (1954). No military targets were located on or within the walls of the Old Town.

79. During the shelling on 8 to 13 November 1991 of the city of Dubrovnik, buildings in the Old Town were damaged, as well as hotels, housing refugees and other civilian structures in other parts of the city.

80. During the shelling on 6 December 1991 of the city of Dubrovnik, at least six buildings in the Old Town were destroyed in their entirety and hundreds more suffered damage. Hotels, housing refugees and other civilian structures were severely damaged or destroyed in other parts of Dubrovnik, specifically in the Lapad and Babin Kuk areas.

81. In October 1991, the Serb forces took control of the Croatian towns and villages Konavle, Zupa Dubravacka, and Primorje in the proximity of the city of Dubrovnik. In the aftermath of this takeover, from 2 to 24 October 1991, JNA troops systematically plundered public, commercial and private property in the towns and villages Brgat, Cilipi, Dubravka, Gruda, Mocici, Osojnik, Slano, Donja Ljuta, Popovici, Mihanici, Drivenik, Konavle, Plat, Cepikuce, Uskoplje, Gabrili, Pridvoje, Molunat, Donja Cibaca, Karasovici and Zvekovica. Much of this property was transported to Montenegro in JNA military vehicles. The JNA thereafter instituted measures to track and maintain the looted property.

82. JNA troops also systematically destroyed public, commercial, and religious buildings as well as private dwellings in the above listed towns and villages. This destruction took place after the cessation of fighting when the areas were securely under the control of the JNA.

83. By these acts and omissions, **Slobodan MILOSEVIC** committed:

Count 28: Extensive destruction and appropriation of property, not justified by military necessity and carried out unlawfully and wantonly, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 29: Wanton destruction of villages, or devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(b) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 30: Destruction or wilful damage done to historic monuments and institutions dedicated to education or religion, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 31: Plunder of public or private property, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(e) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 32: Unlawful attacks on civilian objects, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 52(1) of Additional Protocol I to the Geneva Conventions of 1949 and customary law, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

GENERAL ALLEGATIONS:

84. All acts and omissions alleged in this indictment between 1 August 1991 and June 1992 occurred on the territory of the former Yugoslavia.

85. Between at least 1 August 1991 and at least June 1992, a state of armed conflict existed in Croatia. Until 7 October 1991, this armed conflict was internal in nature. From 8 October 1991 an international armed conflict and partial occupation existed in the Republic of Croatia.

86. All acts and omissions charged as Grave Breaches of the Geneva Conventions of 1949 occurred during the international armed conflict and partial occupation of Croatia.

87. At all times relevant to this indictment, the victims of Grave Breaches of the Geneva Conventions of 1949 were persons protected under the provisions of the relevant Geneva Conventions.

88. All acts and omissions charged relative to the destruction of property as Grave Breaches of the Geneva Conventions of 1949 involved "protected property" under the relevant provisions of the Geneva Conventions.

89. At all times relevant to this indictment, **Slobodan MILOSEVIC** was required to abide by the laws and customs governing the conduct of armed conflicts, including the Geneva Conventions of 1949 and the additional protocols thereto.

90. All acts and omissions charged as Crimes against Humanity were part of a widespread and systematic attack directed against the Croat and other non-Serb civilian population of large areas of Croatia.

ADDITIONAL FACTS:

91. The Republic of Croatia, formerly one of the six republics of the SFRY, is located in south-eastern Europe and borders Slovenia and Hungary to the north and north-east and the Federal Republic of Yugoslavia and Bosnia and Herzegovina to the east and south.

92. The territories of the SAO SBWS, the SAO Western Slavonia, the SAO Krajina and the Dubrovnik Republic are indicated in the attached Annex III.

93. In the 1991 census, the population of the Republic of Croatia was 4,784,265 of which 3,736,356 (78.1%) were Croats; 581,663 (12.2%) were Serbs; 43,469 (0.9%) were Muslims; 22,355 (0.5%) were Hungarians; 106,041 (2.2%) were Yugoslavs; and 294,381 (6.1%) were others or undeclared.

94. In April and May 1990, the Republic of Croatia held elections in which the Croatian Democratic Union (HDZ) won a plurality of votes and secured a majority of seats in the Croatian *Sabor* (parliament). The new *Sabor* then elected the HDZ candidate Franjo TUDMAN President of Croatia.

95. In advance of the 1990 elections, the nationalistic Serbian Democratic Party (SDS) was founded in Knin, advocating the autonomy and later secession of predominately-Serb areas from Croatia.

96. 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 "Serbian National Council", presided over by Milan BABIC, declared "the autonomy of the Serbian people on ethnic and historic territories on which he lives and which are within the current boundaries of the Republic of Croatia as a federal unit of the Socialist Federal Republic of Yugoslavia".

97. On 21 December 1990, Croatian Serbs in Knin announced the creation of a "Serbian Autonomous District" and declared their independence from Croatia. Conflicts between Serbs and Croatian police forces erupted throughout the spring of 1991.

98. In March 1991, the conflict intensified when Serb police forces attempted to consolidate power over areas with significant Serb populations. The Serb police, headed by Milan MARTIC, took control of a police station in Pakrac and battles erupted when the Croatian government attempted to re-establish its authority in the area. At Plitvice, a bus carrying Croatian policemen was attacked by Serbs and another battle erupted. The JNA deployed troops in the area and issued an ultimatum to the Croatian police to withdraw from Plitvice.

99. In March 1991, the collective Federal Presidency of the SFRY reached deadlock on several issues including the issue of instituting a state of emergency in Yugoslavia. The representatives on the Presidency from the Republic of Serbia, the Republic of Montenegro, the Autonomous Province of Vojvodina, and the Autonomous Province of Kosovo and Metohia all resigned from their posts. In a televised address on 16 March 1991, **Slobodan MILOSEVIC**, in his capacity as President of the Republic of Serbia, declared that Yugoslavia was finished and that Serbia would no longer be bound by decisions of the Federal Presidency.

100. 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 Yugoslavia. On 25 June 1991, the JNA moved to suppress Slovenia's secession.

101. 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 for 90 days until 8 October 1991. The European Community ultimately recognised Croatia as an independent state on 15 January 1992, and Croatia became a member of the United Nations on 22 May 1992.

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

103. **Slobodan MILOSEVIC's** calls for the union of all Serbs in one state coincided with those agitating for the creation of a "Greater Serbia." The Serbs in the Knin Krajina region, in Eastern Slavonia, and in Western Slavonia began receiving increasing support from the government of the Republic of Serbia. By August 1991, Serb volunteer and police forces in these regions were being supplied and led by officials of the Republic of Serbia Ministry of Internal Affairs.

104. In the Knin area, the JNA forces began openly assisting the Serb police forces led by Milan MARTIC. They participated jointly in an attack on the Croatian village of Kijevo in August 1991. Throughout August and September 1991, substantial areas of Croatia came under Serb control as a result of actions by Serb military, volunteer and police forces, conducted with the support of the JNA.

105. In the Serb-occupied regions of Northern Dalmatia, Lika, Kordun, Banija, Western Slavonia, and Baranja, the Croatian and other non-Serb population was systematically driven out and the areas were incorporated into various "Serbian Autonomous Districts". The JNA remained deployed in the areas where the Serb insurgents had taken control, thereby securing their gains.

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

107. 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 JNA/Serb forces occupied the city, hundreds more Croats were killed by Serb troops. The non-Serb population of the city was expelled within days of its fall under Serb control.

108. In Geneva on 23 November 1991, **Slobodan MILOSEVIC**, Federal Secretary of People's Defence Veljko KADIJEVIC, and Franjo TUDMAN 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.

109. On 3 January 1992, another cease-fire agreement was signed by Franjo TUDMAN and **Slobodan MILOSEVIC** paving the way for the implementation of an United Nations peace plan put forward by Cyrus VANCE. Under the Vance Plan, four United Nations Protected Areas (UNPAs) were established in the areas occupied by Serb forces. The Vance Plan called for the withdrawal of the JNA from Croatia and for the return of displaced persons to their homes in the 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 Republic of Serbian Krajina (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. The territory of the RSK remained under Serb occupation until large portions of it were re-taken by Croatian forces in two operations in 1995. The remaining area of Serb control in Eastern Slavonia was peacefully re-integrated into Croatia in 1998.

110. The SFRY existed as a sovereign state until 27 April 1992 when the constitution of the Federal Republic of Yugoslavia was adopted, replacing the Constitution of the Socialist Federal Republic of Yugoslavia of 1974.

Dated this day of 2001
At The Hague
The Netherlands

Carla del Ponte
Prosecutor

ANNEX I

VICTIMS VOCIN - PARAGRAPH 39

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
December 1991	VOCIN	SIMIC, Jaga	1929/FEMALE
		MATANCI, Marija	1939/FEMALE
		PERSIC, Franca	1928/FEMALE
		MEDIC, Branko	1959/MALE
		MATANCI, Stjepan	1932/MALE
		JURMANOVIC, Stjepan	1933/MALE
		STIMAC, Jakob	1911/MALE
		STIMAC, Angelina	1915/FEMALE
		BULJEVAC, Ante	1907/MALE
		TOMOLA, Rozalija	1921/FEMALE
		PERSIC, Alojzije	1922/MALE

VOLF, Dragutin	1922/MALE
IVANKOVIC, Marica	1930/MALE 1926/MALE
MATANCI, Franjo	1927/FEMALE
MATANCI, Marija	1929MALE
MEDVED, Mirko	1911/FEMALE
DORIC, Paulina	1932/FEMALE
SIMIC, Julka	1965/MALE
PAJTL, Josip	1932/MALE
SIMIC, Ivan	1934/FEMALE
SIMIC, Marija	1914/FEMALE
AMENT, Veronika	1959/MALE
STIMAC, Stjepan	1963/FEMALE
BASIC, Mirjana	1919/FEMALE
MAJDANCIC, Marija	1909/MALE 1918/FEMALE
MAJIC, Stipan	1954/MALE
MAJIC, Ana	1972/MALE
BON, Ivica	1959/MALE
SALAC, Goran	1960/MALE
SUPAN, Vlado	
IVANKOVIC, Drago	

****** Plus 1 Unidentified Deceased**

VICTIMS BACIN -PARAGRAPH 40

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
21 October 1991	BACIN	ALAVANCIC Katarina	1910/ FEMALE
			1922/ FEMALE
		ALAVANCIC Terezija	1910/ MALE
		ANTOLOVIC Josip	1917/ FEMALE
		ANTOLOVIC Marija	1901/ FEMALE
		BATINOVIC Marija	1926/ MALE
		BLINJA Josip	1939/ FEMALE
		CORIC Mara	1915/ MALE
		COVIC Mijo	1942/ FEMALE
		DIKULIC Ana	1933/ MALE
		DUKIC Antun	1923/ FEMALE
		DUKIC Marija	1926/ FEMALE
		FERIC Ana	1923/ MALE
		FERIC Juraj	1925/ FEMALE
		FERIC Kata	1949/ MALE
		JUKIC Filip	1924/ FEMALE
		JUKIC Marija	1919/ FEMALE
		JUKIC Veronika	1922/ FEMALE
		KRAMARIC Terezija	Not Known/ MALE

KRIVAJIC Antun	1929/ MALE
KRNIC Mijo	1928/ FEMALE
KROPF Barbara	1931/ MALE
JROPF Pavao	1908/ MALE
LIKIC Andrija	1923/ FEMALE
LONCAR Ana	1906/ FEMALE
LONCAR Kata	1910/ MALE
LONCARIC Nikola	Not Known/ FEMALE
MILASINOVIC Marija	1946/MALE
MUCAVAC Antun	1922/ FEMALE
PEZO Sofija	1920/ FEMALE
PIKTAJA Anka	1915/ FEMALE
STANKOVIC Veronika	1912/ MALE 1920/ MALE
SABLJAR Stjepan	1924/ FEMALE
SVRACIC Antun	1925/ FEMALE
SVRACIC Marija	1931/ FEMALE
TEPIC Ana	1905/ FEMALE
VLADIC Katarina	
VOLAREVIC Soka	

VICTIMS BACIN (Continuation) -PARAGRAPH 40

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
October 1991	Not Known	LONCAR Antun	1908/ MALE
		BLINJA Katarina	1933/ FEMALE
		BLINJA Nikola	1922/ MALE
		BLINJA Ana	1929/ FEMALE
		KULISIC Ivica	1972/ MALE
		SESTIC Marija	1922/ FEMALE
		DIKULIC Ruza	1913/ FEMALE
		DIKULIC Sofija	1946/ FEMALE
		DIKULIC Maca	Not Known/ FEMALE
		DUKIC Danica	Not Known/ FEMALE
		DUKIC Kata	Not Known/ FEMALE
		DUKIC Liza	Not Known/ FEMALE
		JUKIC Iva	Not Known/ FEMALE
		JURIC Janja	Not Known/ FEMALE
		KRNIC Marija	Not Known/ FEMALE
		KULISIC Ivan	1926/ MALE
		LAZIC Mijo	Not Known/MALE
		LONCAREVIC Antun	Not Known/ MALE
		LUJIC Janja	1954/ FEMALE

MATIJEVIC Dragica	Not Known/ FEMALE
DIKOLIC Stjepan	Not Known/ MALE
DURINOVIC Antun	Not Known/ MALE
TEPIC Dusan	Not Known/ MALE
PEZO Ivo	Not Known/ FEMALE
MUCAVAC Mara	Not Known/ FEMALE
DELIC Marija	Not Known/ FEMALE
SESTIC Jula	Not Known/ FEMALE
JURATOVIC Marija	Not Known/ MALE
MISIC Mijo	1913/ MALE
TRNINIC Ivan	Not Known/ FEMALE
TRNINIC Terezija	Not Known/ MALE
TRNINIC Ivo	1925/ FEMALE
TRNINIC Kata	Not Known/ MALE
VUKOVIC Pero	

VICTIMS BACIN (Continuation) -PARAGRAPH 40

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
October 1991	Not Known	Milan SESTIC	1941/ MALE
		Stefo KRNIC	Not Known/ MALE
		Anka BATINOVIC	Not Known/ FEMALE
		Reza KRIVAJIC	Not Known/ FEMALE
		Sofija BARIC	Not Known/ FEMALE
		Jozo KARANOVIC	Not Known/ MALE

Antun LIKIC	Not Known/ MALE
Jelka LIKIC	Not Known/ FEMALE
Anka LIKIC	Not Known/ FEMALE
Antun PAVIC	1936/ MALE
Antun BUNJEVAC	40 years/MALE
Toma BUNJEVAC	60 years/MALE
Luka ORDANIC	60 years/MALE
Matija PAVIC	60 years/MALE
Nikola FELBABIC	50 years/MALE
Nikola VRPOLJAC	55 years/MALE
Anka JOSIPOVIC	60 years/ FEMALE
Ivo JOSIPOVIC	50 years/MALE
Ankica JOSIPOVIC	50 years/ FEMALE
Josip KARAGIC	50 years/MALE
Antun CORIC	50 years/MALE
Josip CORIC	60 years/MALE
Vera CORIC	60 years/FEMALE
Grga GLAVINIC	60 years/MALE
Antun ORDANIC	60 years/MALE
Mato BARUNOVIC	60 years/MALE
Stefan LONCAR	60 years/MALE
Kata LONCAR	60 years/ FEMALE
Barica CORIC	60 years/ FEMALE
Josip CORIC	30 years/MALE

Ivo BARUNOVIC	Not Known/MALE
Kata BUNJEVAC	Not Known/ FEMALE
Nikola BARUNOVIC	Not Known/MALE
Nevenka PERKOVIC	Not Known/ FEMALE
Zoran PERKOVIC	Not Known/MALE
Vlado PERKOVIC	Not Known/ FEMALE
Marija BARUNOVIC	

******Plus 2 Unidentified Persons**

VICTIMS LIPOVANIC - PARAGRAPH 42

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
28 October 1991	LIPOVANIC	BROZINCEVIC, Franjo	1928/MALE
			1925/FEMALE
		BROZINCEVIC, Mira	Not Known/FEMALE
		BROZINCEVIC, Mata	Not Known/FEMALE
			1971/ MALE
		BROZINCEVIC, Roza	Not Known/MALE
		BROZINCEVIC, Mirko	Not Known/ FEMALE
			Not Known/ FEMALE
		BROZINCEVIC, Franje	
	CINDRIC, Marija		
	SINDRIC, Katja		

VICTIMS - VUKOVICI

PARAGRAPH 43

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
7 November 1991	VUKOVIC	VUKOVIC, Vjekoslav	Not Known/MALE
		VUKOVIC, Lucija	Not Known/ FEMALE
		VUKOVIC, Milka	Not Known/ FEMALE
		VUKOVIC, Dana	Not Known/ FEMALE
		VUKOVIC, Nikola	Not Known/ FEMALE
		MATINOVIC, Jose	Not Known/MALE
		MATINOVIC, Nikola	Not Known/MALE
		VUKOVIC, Nikola	Not Known/MALE
		VUKOVIC, Ivan	Not Known/MALE
			1934/MALE

VICTIMS SABORSKO -PARAGRAPH 44

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
12 November 1991	SABORSKO	BICANIC, Petar	1935/MALE
		BICANIC, Milan	1927/MALE
		MATOVINA, Milan	Not Known/MALE
		VUKOVIC, Jure	Not Known/MALE
		VUKOVIC, Jure	Not Known/MALE
		SPEHAR, Mate	Not Known/MALE
		BICANIC, Ana	Not Known/ FEMALE
		BICANIC, Nikola	Not Known/MALE
		VUKOVIC, Ivan	Not Known/MALE

VUKOVIC, Jela	Not Known/ FEMALE
DUMENICIC, Nikola	1930/MALE
	1895/MALE
MATOVINA, Mate	1932/MALE
VUKOVIC, Petar	Not Known/MALE
STRK, Josip	Not Known/MALE
DUMENCIC, Ivica	Not Known/ FEMALE
MATOVINA, Marta	Not Known/ FEMALE
MATOVINA, Kate	Not Known/MALE
MATOVINA, Mate	

****** Plus 2 Unidentified Deceased**

VICTIMS SKABRNJA CASE ONE - PARAGRAPH 45

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
18-19 November 1991	SKABRNJA	PERICA, Josip	1934/ MALE
		JURIC, Ana	Age 77/FEMALE
		SEGARIC, Sime	1955/ MALE
		BRKIC, Marija	1943/ FEMALE
		CURKOVIC, Zeljko	1968/ MALE
			1953/ MALE
		HORVAT, Vladimir	1956/ MALE
		VICKOVIC,	1932/FEMALE

Stanko	1939/MALE
ROGIC, Kata	1959/MALE
ROGIC, Nikola	1955/MALE
ROGIC, Marko	1929/MALE
SKARA, Nediljko	1922/MALE
ZILIC, Roko	1936/FEMALE
PAVICIC, Niko	1927/MALE
VICKOVIC, Stana	1936/MALE
RAZOV, Ivan	1932/ MALE
JURIC, Petar	1955/MALE
PERICA, Ljubo	1955/MALE
PERICA, Gaspar	1927/MALE
JURIC, Nediliko	1928/MALE
SEGARIC, Krsto	1928/FEMALE
ZILIC, Tadija	1914/ FEMALE
ZILIC, Pavica	1924/ MALE
ZILIC, Mara	1909/ MALE
BRKIC, Joso	1911/FEMALE
JURIC, Grgo	1956/MALE
SEGARIC, Grgica	1931/MALE
	1933/MALE

MILJANIC, Slavko	1928/MALE
SEGARIC, Rade	1943/MALE
SEGARIC, Vice	1965/MALE
MILJANIC, Josip	1961/MALE
BRKIC, Marko	1955/MALE
PAVICIC, Mile	1942/MALE
SEGARIC, Ivica	1932/MALE
RAZOV, Ante	Age 71/FEMALE
PAVICIC, Petar	Age 86/FEMALE
ZUPAN, Marko	
DRAZINA, Marija	
RAZOV, Jela	

VICTIMS NADIN - PARAGRAPH 46

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
19 November 1991	NADIN	BRZOJA, Danka	1951/FEMALE
			1933/FEMALE
		SESTAN, Marija	1911/MALE
		SESTAN, Jakov	1922/FEMALE
		CIRJAK, Ika	1928/FEMALE
		BRKIC, Stoja	1921/FEMALE
			1965/MALE
		CIRJAK, Masa	

ATELJ, Novica

VICTIMS SKABRNJA CASE TWO - PARAGRAPH 47

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
18 November 1991 to February 1992	SKABRNJA	BRKIC, Kata	1935/FEMALE
		BRKIC, Kata	1939/FEMALE
		STURA, Bozo	Not Known/MALE
		BRKIC, Josipa	1920/FEMALE
		PERICA, Kata	Age 60/FEMALE
		SKARA, Pera	Not Known/FEMALE
		IVKOVIC, Ljubomir	Not Known/MALE
		BRKIC, Marija	1906/ FEMALE
		BILAVER, Marija	1921/FEMALE 1917/FEMALE
		STURA, Draginja	1918/MALE
		BRKIC, Mato	Age 78/FEMALE
		IVKOVIC, Tereza	1899/FEMALE 1925/FEMALE
		RAZOV, Grgica	1915/MALE
		BRKIC, Ana	1915/MALE
		BRKIC, Mijat	1920/FEMALE

BILAVER, Grgo	1912/FEMALE
SEGARIC, Luca	1914/FEMALE 1919/MALE
JURJEVIC, Simica	1952/MALE
GOSPIC, Dumica	Not Known/FEMALE
KARDUM, Mirko	Not Known/MALE 1941/MALE
IVKOVIC, Nedjeljko	1925/MALE
BILAVER, Peka	1938/MALE
RAZOV, Marko	
BABIC, Ivan	
ERLIC, Jure	
RAZOV, Sime	

VICTIMS BRUSKA - PARAGRAPH 48

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
21 December 1991	BRUSKA	MARINOVIC, Petar	1923/MALE
		MARINOVIC, Krste	Not Known/MALE Not Known/FEMALE
		MARINOVIC,	Not Known/MALE

Draginja	Not Known/MALE
MARINOVIC, Dusan	1927/ FEMALE
MARINOVIC, Roko	1926/FEMALE
MARINOVIC, Manda	Not Known/MALE
MARINOVIC, Stana	Not Known/ FEMALE
MARINOVIC, Dragan	Not Known/MALE
MARINOVIC, Ika	
DRACA, Sveto (Serbian)	

**VICTIMS OVCARA FARM (VUKOVAR HOSPITAL)
PARAGRAPH 49**

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	ADZAGA, Jozo	1949/MALE
		ANDRIJANIC, Vinko	1953/MALE
		ANIC-ANTIC, Jadranko	1959/MALE
		ARNOLD, Kresimir	1958/MALE
		ASADANIN, Ilija	1952/MALE
		BABIC, Drazen	1966/MALE
		BAINRAUCH, Ivan	1956/MALE

	1938/MALE
BAJNRAUH, Tomislav	
	1960/MALE
BAKETA, Goran	
	1956/MALE
BALAS, Stjepan	
	1974/MALE
BALOG, Dragutin	
	1928/MALE
BALOG, Josip	
	1958/MALE
BALOG, Zvonimir	
	1952/MALE
BALVANAC, Duro	
	1967/MALE
BANOZIC, Boris	
	1968/MALE
BARANJAJI, Pero	
	1967/MALE
BARBARIC, Branko	
	1935/MALE
BARBIR, Lovro	
	1965/MALE
BARICEVIC, Zeljko	
	1946/MALE
BARISIC, Franjo	
	1967/MALE
BARTA, Andjelko	
	1947/MALE
BATARELO, Josip	
	1955/MALE
BATARELO, Zeljko	
	1972/MALE
BAUMGERTNER, Tomislav	
	1968/MALE
BEGCEVIC, Marko	
	1958/MALE
BEGOV, Zeljko	
	1958/MALE
BINGULA, Stjepan	
	1970/MALE
BJELANOVIC, Ringo	
	1959/MALE

BLASKOVIC, Miroslav	1964/MALE
BLAZEVIC, Zlatko	1953/MALE
BODROZIC, Ante	1967/MALE
BOSAK, Marko	1919/MALE
BOSANAC, Dragutin	1941/MALE
BOSANAC, Tomislav	1960/MALE
BOSNJAKOV, Josip	

VICTIMS OVCARA FARM (VUKOVAR HOSPITAL)
(Continuation)
PARAGRAPH 49

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	BOZAK, Ivan	1958/MALE
		BRACIC, Zvonimir	1970/MALE
		BRADARIC, Josip	1949/MALE
		BRAJDIC, Josip	1950/MALE
		BUOVAC, Ivan	1966/MALE
		BUZIC, Zvonko	1955/MALE
		CRNJAC, Ivan	1966/MALE
		CALETA, Zvonimir	1953/MALE
		COLAK, Ivica	1965/MALE
		CUPIC, Mladen	1967/MALE
		DALIC, Tihomir	1966/MALE
		DOLISNI, Ivica	1960/MALE
		DOSEN, Ivan	1958/MALE

DOSEN, Martin	1952/MALE
DOSEN, Tadija	1950/MALE
DRAGUN, Josip	1962/MALE
DUVNJAK, Stanko	1959/MALE
DUDAR, Sasa	1968/MALE
DUKIC, Vladimir	1948/MALE
EBNER, Vinko-Duro	1961/MALE
FIRI, Ivan	1915/MALE
FITUS, Karlo	1964/MALE
FRISCIC, Dragutin	1958/MALE
FURUNDZIJA, Petar	1949/MALE
GAJDA, Robert	1966/MALE
GALIC, Milenko	1965/MALE
GALIC, Vedran	1973/MALE
GARVANOVIC, Borislav	1954/MALE 1971/MALE
GASPAR, Zorislav	1956/MALE
GAVRIC, Dragan	1960/MALE
GLAVASEVIC, Sinisa	1966/MALE
GOJANI, Jozo	1959/MALE
GOLAC, Krunoslav	1955/MALE
GRAF, Branislav	1960/MALE
GRANIC, Dragan	

VICTIMS OVCARA FARM (VUKOVAR HOSPITAL)

(Continuation)
PARAGRAPH 49

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	GREJZA, Milan	1959/MALE
		GRUBER, Zoran	1969/MALE
		GUDELJ, Drago	1940/MALE
		HEGEDUSIC, Tomislav	1953/MALE
			1972/MALE
		HEGEDUSIC, Mario	1962/MALE
		HERCEG, Zeljko	1969/MALE
		HERMAN, Ivan	1955/MALE
		HERMAN, Stjepan	1964/MALE
		HLEVNJAK, Nedeljko	1955/MALE
			1958/MALE
		HOLJEVAC, Nikica	1949/MALE
		HORVAT, Ivica	1969/MALE
		HORVAT, Viktor	1941/MALE
		HUSNJAK, Nedjeljko	1957/MALE
		ILES, Zvonko	1955/MALE
		IMBRISIC, Ivica	1950/MALE
		IVAN, Zlatko	1957/MALE
		IVEZIC, Aleksander	1971/MALE

JAJALO, Marko	1957/MALE
JAKUBOVSKI, Martin	1966/MALE
JALSOVEC, Ljubomir	1939/MALE 1956/MALE
JAMBOR, Tomo	1959/MALE
JANIC, Mihael	1956/MALE
JANJIC, Borislav	1957/MALE
JANTOL, Boris	1967/MALE
JARABEK, Zlatko	1955/MALE
JEZIDZIC, Ivica	1972/MALE
JOVAN, Zvonimir	1971/MALE
JOVANOVIC, Branko	1969/MALE 1956/MALE
JOVANOVIC, Oliver	1966/MALE
JULARIC, Goran	1946/MALE
JURELA, Damir	1966/MALE
JURELA, Zeljko	1963/MALE
JURENDIC, Drago	
JURISIC, Marko	
JURISIC, Pavao	
JURISIC, Zeljko	

VICTIMS OVCARA FARM (VUKOVAR HOSPITAL)
(Continuation)
PARAGRAPH 49

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	KACIC, Igor	1975/MALE
		KAPUSTIC, Josip	1965/MALE
		KELAVA, Kresimir	1953/MALE
		KIRALJ, Damir	1964/MALE
		KIRALJ, Damir	1959/MALE
		KITIC, Goran	1966/MALE
		KNEZIC, Duro	1937/MALE
		KOLAK, Tomislav	1962/MALE
		KOLAK, Vladimir	1966/MALE
		KOLOGRANIC, Dusko	1950/MALE
			1952/MALE
		KOMORSKI, Ivan	1942/MALE
		KOSTENAC, Bono	1962/MALE
		KOSTOVIC, Borislav	1957/MALE
		KOSIR, Bozidar	1953/MALE
		KOVAC, Ivan	1958/MALE
		KOVAC, Mladen	1962/MALE
		KOVACEVIC, Zoran	1970/MALE
		KOVACIC, Damir	1968/MALE

KOZUL, Josip	1966/MALE
KRAJINOVIC, Ivan	1969/MALE
KRAJINOVIC, Zlatko	1964/MALE 1963/MALE
KRASIC, Ivan	1959/MALE
KREZO, Ivica	1957/MALE
KRISTICEVIC, Kazimir	1966/MALE 1957/MALE
KRIZAN, Drago	1949/MALE
KRUNES, Branimir	1960/MALE
LENDEL, Tomislav	1950/MALE
LENDEL, Zlatko	1956/MALE
LEROTIC, Zvonimir	1951/MALE
LESIC, Tomislav	1971/MALE
LET, Mihajlo	1955/MALE
LILI, Dragutin	1968/MALE
LJUBAS, Hrvoje	1953/MALE
LONCAR, Tihomir	1954/MALE
LOVRIC, Joko	1961/MALE
LOVRIC, Jozo	1963/MALE
LUCIC, Marko	
LUKENDA, Branko	
LUKIC, Mato	

VICTIMS OVCARA FARM (VUKOVAR HOSPITAL)
(Continuation)
PARAGRAPH 49

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	MAGDIC, Mile	1953/MALE
		MAGOC, Predrag	1965/MALE
		MAJIC, Robert	1971/MALE
		MAJOR, Zeljko	1960/MALE
		MANDIC, Marko	1953/MALE
		MARICIC, Zdenko	1956/MALE
		MARIJANOVIC, Martin	1959/MALE
			1934/MALE
		MAZAR, Ivan	1936/MALE
		MEDESI, Andrija	1940/MALE
		MEDESI, Zoran	1956/MALE
		MERIC, Ohran	1952/MALE
		MIHOVIC, Tomislav	1952/MALE
		MIKLETIC, Josip	1961/MALE
		MIKULIC, Zdravko	1969/MALE
		MIKULIC, Zvonko	1955/MALE
		MILIC, Slavko	1950/MALE
		MILJAK, Zvonimir	1968/MALE
		MISIC, Ivan	1966/MALE
		MLINARIC, Mile	

	1955/MALE
MOKOS, Andrija	
	1965/MALE
MOLNAR, Aleksandar	
	1969/MALE
MUTVAR, Antun	1965/MALE
NAD, Darko	1935/MALE
NAD, Franjo	1958/MALE
NEJASMIC, Ivan	1966/MALE
NICOLLIER, Jean Michael	1970/MALE
	1950/MALE
OMEROVIC, Mersad	
	1963/MALE
ORESKE, Ivan	
	1959/MALE
PAPP, Tomislav	
	1965/MALE
PATARIC, Zeljko	
	1963/MALE
PAVLIC, Slobodan	
	1961/MALE
PAVLOVIC, Zlatko	
	1967/MALE
PERAK, Mato	
	1965/MALE
PERKO, Aleksandar	
	1963/MALE
PERKOVIC, Damir	
	1949/MALE
PERKOVIC, Josip	
PETROVIC, Stjepan	

VICTIMS OVCARA FARM (VUKOVAR HOSPITAL)
(Continuation)
PARAGRAPH 49

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	PINTER, Nikola	1940/MALE
		PLAVSIC, Ivan	1939/MALE
		POLHERT, Damir	1962/MALE
		POLOVINA, Branimir	1950/MALE
			1952/MALE
		POSAVEC, Stanko	1931/FEMALE
		POTHORSKI,Janja	1934/MALE
		PRAVDIC, Tomo	1959/MALE
		PRPIC, Tomislav	1949/MALE
		PUCAR, Dmitar	1955/MALE
		RAGUZ, Ivan	1954/MALE
		RASIC, Milan	1968/MALE
		RATKOVIC, Kresimir	1951/MALE
		RIBICIC, Marko	1960/MALE
		RIMAC, Salvador	1942/MALE
		ROHACEK, Karlo	1971/MALE
		ROHACEK, Zeljko	1960/MALE
		SAITI, Ceman	1946/MALE
		SAMARDZIC, Damjan	1964/MALE

	1964/MALE
SAVANOVIC, Tihomir	1939/MALE
SENCIC, Ivan	1965/MALE
SOTINAC, Stipan	1958/MALE
SPUDIC, Pavao	1968/MALE
STANIC, Marko	1942/MALE
STANIC, Zeljko	1949/MALE
STEFANKO, Petar	1954/MALE
STOJANOVIC, Ivan	1961/MALE
STUBICAR, Ljubomir	1914/MALE
	1955/MALE
SAJTOVIC, Davor	1960/MALE
SAJTOVIC, Martin	1971/MALE
SARIK, Stjepan	1943/MALE
SASKIN, Sead	1963/MALE
SINDILJ, Vjekoslav	1958/MALE
SRENK, Duro	1959/MALE
STEFULJ, Drazen	1950/MALE
TABACEK, Antun	1940/MALE
TADIC, Tadija	1971/MALE
TARLE, Dujo	1963/MALE
TEREK, Antun	
TISLJARIC, Darko	
TIVANOVAC, Ivica	

VICTIMS OVCARA FARM (VUKOVAR HOSPITAL)

(Continuation)
PARAGRAPH 49

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
20 November 1991	OVCARA	TOMASIC, Tihomir	1963/MALE
		TORDINAC, Zeljko	1961/MALE
		TOT, Tomislav	1967/MALE
		TRALJIC, Tihomir	1967/MALE
		TURK, Miroslav	1950/MALE
		TURK, Petar	1947/MALE
		TUSTONJIC, Dane	1959/MALE
		TUSKAN, Drazen	1966/MALE
		USAK, Branko	1958/MALE
		VAGENHOFER, Mirko	1937/MALE
		VARENICA, Zvonko	1957/MALE
		VEBER, Sinisa	1969/MALE
		VIDOS, Goran	1960/MALE
		VILENICA, Zarko	1969/MALE
		VIRGES, Antun	1953/MALE
		VLAHO, Mate	1959/MALE
		VLAHO, Miroslav	1967/MALE
		VOLODER, Zlatan	1960/MALE

	1971/MALE
VON BASINGGER, Harllan	1951/MALE
VUJEVIC, Zlatko	1970/MALE
VUKOJEVIC, Slaven	1961/MALE
VUKOVIC, Rudolf	1957/MALE
VUKOVIC, Vladimir	1967/MALE
VUKOVIC, Zdravko	1946/MALE
VULIC, Ivan	1941/MALE
VULIC, Vid	1971/MALE
VULIC, Zvonko	1955/MALE
ZERA, Mihajlo	1953/MALE
ZELJKO, Josip	1959/MALE
ZERAVICA, Dominik	1970/MALE
ZIVKOVIC, Damir	1960/MALE
ZIVKOVIC, Goran	1963/MALE
ZUGEC, Borislav	

VICTIMS BARANJA CASE ONE - PARAGRAPH 50

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
21 September 1991	BARANJA	ANDAL Zoran	1967 /MALE
		BECK Pavle	1957 /MALE
		BRAJIC Haso	1933 /MALE
		FILIPCIC Zeljko	1966 /MALE
		FORJAN Ivan	1951 /MALE
		KUSIC Darko	1968 /MALE

PREDOJEVIC Cedomir	1954 /MALE
STIMEC Drazen	1970 /MALE
ZELEMBER Ivan	1934 /MALE
ZEMLJAK Pavao	1934 /MALE
ZEMLJAK Vladimir	1967 /MALE

VICTIMS BARANJA CASES TWO AND THREE - PARAGRAPH 51

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
4 October 1991	BARANJA	BALOG Josip	1945/MALE
		BANKOVIC Martin	Not Known/MALE
		GRBESIC Mile	1962/MALE
		JUKIC Rudolf	1964/MALE
		KRKALO Ivica	1958/MALE
		MIKEC Josip	1954/MALE
		MLINAREVIC Zvonko	Not Known/MALE
		OROZ Vinko	1967/MALE
		RASIC Pero	1945/MALE
		RASTIJA Zlatko	1971/MALE
		SILES Tibor	1963/MALE
		SINAS Janos	1957/MALE

STRMECKI Stanislav	1970/MALE
TOMICIC Ivan	1931/MALE
TOMICIC Danijel	1929/MALE
BACA Erne	1957/MALE
HADIC Elvis	1973/MALE
LUKAC Iles	1945/MALE
MAKSIMOVIC Andrija	Not Known/MALE 1953/MALE
MESARIC Franjo	Not Known/MALE
MILIC Pero	1965/MALE
RADALJEVIC Djordje	1932/MALE
RAIC Karlo	1936/MALE
SARAC Pavo	1937/MALE
SIMUN Mihajlo	1947/MALE
SOLDO Ranko	1946/MALE
SOMODVORAC Marinko	1934/MALE
TOLLAS Mihaly	

VICTIMS LOVAS MINEFIELD - PARAGRAPH 52

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
15 October 1991	LOVAS MINE FIELD	BADANJAK Nikola	1934/MALE
		BADANJAK Petar	1956/MALE
		BALIC Luka	1957/MALE
		BOZIC Zlatko	1959/MALE

BODANAC Bosko	1954/MALE
CONJAR Ivan	1966/MALE
HODAK Mato	1957/MALE
KRALJEVIC Ivan	1955/MALE
KUZMIC Slavko	1961/MALE
MARKOVIC Marinko	1953/MALE
PALIJAN Ivan	1956/MALE
PANJIK Antun	1953/MALE
PANJIK Zlatko	1966/MALE
PANJIK Zlatko	1960/MALE
SABLJAK Ivan	1950/MALE
SABLJAK Marko	1949/MALE
SABLJAK Tomo	1956/MALE
SALAJ Mijo	1957/MALE
SOLAKOVIC Darko	1957/MALE
STRANGAREVIC Slavko	1962/MALE
TURKALJ Josip	1943/MALE
VIDIC Marko	

VICTIMS ERDUT CASE ONE - PARAGRAPH 53

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
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9 October 1991	ERDUT	ASTALOS Ivica	1964/MALE
		BENCE Josip	1925/MALE
		BERES Pavao	1927/MALE
		KALOZI Antun	1929/MALE
		KALOZI Nikola	1952/MALE
		KALOZI Nikola	1922/MALE
		MIHAJLEV Ivan	1955/MALE
			1973/MALE
		PALOS Atika	1934/MALE
		PAP Franjo	1966/MALE
		PAP Mihajlo	1967/MALE
		SENASI Josip	1935/MALE
		SENASI Stjepan	

VICTIMS ERDUT CASE TWO - PARAGRAPH 53

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
Several days after 09/10/1991	ERDUT	PAP Franjo	1960/MALE
		PAP Julijana	1941/FEMALE
		RAKIN Natalija	1971/FEMALE

VICTIM ERDUT CASE SEVEN - PARAGRAPH 53

DATE	LOCATION	VICTIM	YEAR OF BIRTH/SEX
3 June 1992	ERDUT	SENASI Marija	1937/FEMALE

VICTIMS ERDUT CASE THREE - KLISA - PARAGRAPH 54

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
11 November 1991	ERDUT	BARBARIC Jakov	1935/MALE
		CURIC Tomo	1937/MALE
		DEBIC Josip	1946/MALE
		KUCAN Ivan	1947/MALE
		VANICEK Josip	1951/MALE

VICTIMS VUKOVAR - PARAGRAPH 55

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
20 November 1991	VUKOVAR	JELECANIN Dragan	1939/MALE
		BRAJDIC Josip	1950/MALE
		RASIC Nikola	1950/MALE
		PRSA Jandre	1938/MALE
		SUSTO Dragutin	1938/MALE
		SKOC Zvonimir	1957/MALE
		DALIC Drago	1961/Male
		SIMUNDZA Davor	1962/Male
		REDZIC Ivan	1966/Male
		SIMIC Zvonimir	1951/Male
		KATIC Ivan	1940/Male

****** Plus 23 unidentified deceased**

VICTIMS ERDUT CASE FOUR - PARAGRAPH 56

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
10 December 1991	ERDUT	BUTKOVIC Matej	1940/MALE
		GULJASEVIC Ivan	1949/MALE
		KOVACEVIC Ivan	1931/MALE
		KOVACEVIC Stjepan	1928/MALE
		RAIC Aleksandar	1914/MALE

VICTIMS ERDUT CASE FIVE - PARAGRAPH 57

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
26 December 1991	ERDUT	MAJ Manda	1933/FEMALE
		MATIN Andrija	1936/MALE
		MATOSEVIC Nikola	1948/MALE
		PITTL Franjo	1933/MALE
		SIMEK Andrija	1931/MALE
		TESANAC Stjepan	1932/MALE
		ZORETIC Josip	1951/MALE

VICTIMS ERDUT CASE SIX - PARAGRAPH 58

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
21 February 1992	ERDUT	ALBERT Duro	1933/MALE
		ALBERT Helena	1934/FEMALE
		ALBERT	1940/FEMALE

Viktorija

1915/FEMALE

TERZIC Ana

VICTIMS GRABOVAC - PARAGRAPH 59

DATE	LOCATION	VICTIMS	YEAR OF BIRTH/SEX
4 May 1992	GRABOVAC	GROFEC Ruza	1930/FEMALE
		JUMIC Ivan	1947/MALE
		LILEK Ivan	1938/MALE
		NAD Stevan	1939/MALE
		VLAHOVIC Andja	1944/FEMALE

ANNEX II.

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

DATE	LOCATION	VICTIMS	YEAR OF BIRTH / SEX
1 October	Osojnik	Mato VIOLIC	1945 / Male
2 October	Kupari	Jele FERLAN	1949 / Female
5 October	Dubrovnik	Rada HASIC	1953 / Female
6 October	Dubrovnik	Milan MILISIC	1941 / Male
6 October	Komolac	Andrija CRNCEVIC	1960 / Male
		Stijepo CIKATO	1949 / Male
7 October	Mokosica	Jozo BRAJOVIC	1950 / Male
		Denis CIMIC	1973 / Male
		Vladimirka	1973 / Female

		DOPSAJ	1971 / Male
		Milenko KULAS	1972 / Male
		Miho LIBAN	1973 / Male
		Nikola LIBAN	1955 / Male
		Ivo MASKARIC	1971 / Male
		Alen VASILJEVIC	1971 / Male
		Josko VUKOVIC	
22 October	Dubrovnik	Grgo VULETIC	1954 / Male
4 November	Dubrovnik	Andro DJURAS	1941 / Male
9 November	Dubrovnik (Babin Kuk)	Luce SPREMIC	1911 / Female
10 November	Dubrovnik	Duro BOKUN	1980 / Male
		Ivo BOKUN	1951 / Male
		Nikica CUPIC	1947 / Male
		Antun LANG	1924 / Male
		Ivo MARTINOVIC	1915 / Male
		Ivan RADIC	1944 / Male
		Tonci ROZIC	1948 / Male
		Dubravko SEVELJ	1962 / Male
		Jovo VASILJEVIC	1937 / Male
20 November	Mokosica	Vito ZITKOVIC	1921 / Male
24 November	Dubrovnik	Nikola KRIJES	1921 / Male

6 December	Dubrovnik	Koviljka KOSJERINA	1942 / Female
		Drago OBRADOVIC	1960 / Male
6 December	Dubrovnik (Gruz)	Duro KOLAR	1918 / Male
6 December	Dubrovnik (Libertas)	Bruno GLANC	1970 / Male
		Ante JABLAN	1947 / Male
		Frano MARTINOVIC	1965 / Male
		Niko MIHOCEVIC	1950 / Male
		Teo PASKOJEVIC	1969 / Male
		Stjepan SALMANIC	1957 / Male
		Andro SAVINOVIC	1947 / Male
6 December	Dubrovnik (Old Town)	Tonci SKOCKO	1973 / Male
		Pavo URBAN	1968 / Male
