

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

Case No. IT-08-91-PT

IN TRIAL CHAMBER II

Before: Judge O-Gon Kwon, Presiding
Judge Kimberly Prost
Judge Ole Bjørn Støle

Registrar: Mr. Hans Holthuis

Date filed: 29 September 2008

PROSECUTOR

v.

**MIĆO STANIŠIĆ
STOJAN ŽUPLJANIN**

PARTLY CONFIDENTIAL

**PROSECUTION'S SUBMISSION OF CONSOLIDATED
INDICTMENT WITH ANNEX A AND A *CONFIDENTIAL*
ATTACHMENT**

The Office of the Prosecutor:

Anna Richterova
Tom Hannis

Counsel for the Accused:

Slobodan Zečević and Slobodan Cvijetić for Mićo Stanišić
Tomislav Višnjić for Stojan Župljanin

THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

Case No. IT-08-91-PT

PROSECUTOR

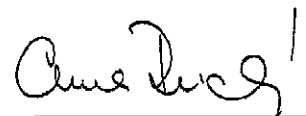
v.

MIĆO STANIŠIĆ
STOJAN ŽUPLJANIN

**PROSECUTION'S SUBMISSION OF CONSOLIDATED INDICTMENT WITH ANNEX A
AND A *CONFIDENTIAL* ATTACHMENT**

1. On 23 September 2008 the Trial Chamber issued its Decision on the Prosecution's Motion for Joinder and for Leave to Consolidate and Amend Indictments ("Decision").¹ In that Decision, the Trial Chamber directed the Prosecution "to file the amended consolidated indictment as authorized in this Decision within seven days of the filing of this Decision."²
2. A Consolidated Indictment that complies with the findings set forth in the Decision is hereby submitted for filing and is included with this submission at Annex A. A Confidential Attachment, containing the list of victims, is attached to the Consolidated Indictment.
3. As the cases of Mićo Stanišić have now been joined, the Prosecution shall turn over any supporting materials relevant to the Consolidated Indictment that were not produced to the Župljanin Defence in relation to his individual indictment.

Word Count: 197



Anna Richterova
Senior Trial Attorney

Dated this 29th day of September 2008

At The Hague, Netherlands

¹ *Prosecutor v. M. Stanišić, et al.*, Case Nos. IT-04-79-PT, IT-99-36/2-PT, Decision on Prosecution's Motion for Joinder and for Leave to Consolidate and Amend Indictments, 23 September 2008 ("23 September Decision").

² *Id.* at p.24.

ANNEX A

THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

CASE NO. IT-08-91-PT

THE PROSECUTOR
OF THE TRIBUNAL

AGAINST

MIĆO STANIŠIĆ
and
STOJAN ŽUPLJANIN

CONSOLIDATED INDICTMENT

The Prosecutor of the International Criminal Tribunal for the Former Yugoslavia, pursuant to his authority under Article 18 of the Statute of the International Criminal Tribunal for the former Yugoslavia (“the Statute of the Tribunal”), charges:

MIĆO STANIŠIĆ
and
STOJAN ŽUPLJANIN

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

THE ACCUSED

MIĆO STANIŠIĆ

1. **Miće STANIŠIĆ** was born on 30 June 1954, in the village of Ponor, Pale Municipality, in Bosnia and Herzegovina (“BiH”). He graduated from law school in Sarajevo.
2. From 21 December 1991, **Miće STANIŠIĆ** was Minister Without Portfolio of the Council of Ministers which was named by the Assembly

of the Serbian People of BiH. **Mičo STANIŠIĆ** was *ex officio* a member of the National Security Council, which was the first *de facto* executive body of the Bosnian Serb republic. From 1 April 1992, **Mičo STANIŠIĆ** was Minister of the newly established Serbian Ministry of Internal Affairs in BiH (“RS MUP”). As Minister of the RS MUP, he was a member of the Government of the Bosnian Serb republic/ Republika Srpska.

STOJAN ŽUPLJANIN

3. **Stojan ŽUPLJANIN** was born on 22 September 1951, in Maslovare, Kotor Varoš Municipality, in BiH. He graduated from the law faculty of the University of Sarajevo and in 1975 began a long career with the Banja Luka Secretariat of Internal Affairs (“SUP”). In 1978 he was appointed Chief of the police station in Međan in Banja Luka, and in 1981 he was appointed Chief of the *Centar* police station in Banja Luka. In 1985 he became the Chief of the Department for the Prevention of General Crime in the municipal SUP in Banja Luka. From 1991 onwards, he was Chief of the Regional Security Services Centre (“CSB”) of Banja Luka. From at least 5 May 1992 until July 1992 he was also a member of the Autonomous Region of Krajina (“ARK”) Crisis Staff, and in 1994 he became an advisor for internal affairs to the President of Republika Srpska.

INDIVIDUAL CRIMINAL RESPONSIBILITY

Article 7(1) of the Statute of the Tribunal

4. **Mičo STANIŠIĆ** is individually criminally responsible pursuant to Article 7(1) of the Statute of the Tribunal for crimes referred to in Articles 3 and 5 of the Statute of the Tribunal as alleged in this Indictment, which he committed, instigated, or in whose planning, preparation or execution he aided and abetted.

5. **Stojan ŽUPLJANIN** is individually criminally responsible pursuant to Article 7(1) of the Statute of the Tribunal for crimes referred to in Articles 3 and 5 of the Statute of the Tribunal as alleged in this Indictment, which he planned, instigated, ordered, committed, or in whose planning, preparation or execution he aided and abetted.

6. By using the word “committed” in this Indictment, the Prosecutor does not allege that the Accused personally committed any of the crimes charged. “Committed” in this Indictment, in the context of Article 7(1),

means participation in a joint criminal enterprise (“JCE”) as a co-perpetrator.

7. A JCE came into existence no later than the establishment of the Assembly of the Serbian People in BiH on 24 October 1991 and continued throughout the period of the conflict in BiH until the signing of the Dayton Accords in 1995. The objective of the JCE was to permanently remove Bosnian Muslims, Bosnian Croats and other non-Serbs from the territory of the planned Serbian state by means which included the commission of the crimes alleged in Counts 1-10.

8. Numerous individuals participated as members in the JCE. Each member, by acts or omissions, contributed to achieving the overall objective of the enterprise. **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** each acted in concert with other members of the JCE including, but not limited to Momčilo KRAJIŠNIK, Radovan KARADŽIĆ, Biljana PLAVŠIĆ, Nikola KOLJEVIĆ (*deceased*), Momčilo MANDIĆ, Velibor OSTOJIĆ, General Ratko MLADIĆ, other members of the Bosnian Serb leadership and leading members of the Serbian Democratic Party (“SDS”) at the republic, regional and municipal levels, leading members of the JNA/VRS in the regions including General Momir TALIĆ (*deceased*), leading members of CSBs, leading members of Public Security Services (“SJBs”) including Simo DRLJAČA (*deceased*), leading members of regional and municipal crisis staffs including Radoslav BRĐANIN, and leading members of other civilian bodies within BiH.

9. Members of the JCE implemented the objective of the JCE through and by using the physical perpetrators to carry out the *actus reus* of the crimes committed in furtherance of the JCE. The physical perpetrators of the crimes were members of the Serb Forces, which collectively included members of RS MUP, Army of Republika Srpska (“VRS”), Yugoslav People’s Army (“JNA”), Yugoslav Army (“VJ”), Territorial Defence (“TO”), Serbian MUP and crisis staffs not identified above, Serbian and Bosnian Serb paramilitary forces and volunteer units, and local Bosnian Serbs acting under their instruction or pursuant to the direction of the aforementioned forces.

10. **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN**, acting through the positions and powers described above, and in concert with other members of the JCE, each participated in the JCE from no later than 1 April 1992 until at least 31 December 1992.

11. **Mičo STANIŠIĆ** is criminally liable for crimes committed in the period 1 April 1992 to 31 December 1992 in the municipalities of Banja Luka, Bileća, Bosanski Šamac, Brčko, Doboј, Donji Vakuf, Gacko, Ilijaš, Ključ, Kotor Varoš, Pale, Prijedor, Sanski Most, Teslić, Vlasenica, Višegrad, Vogošća and Zvornik ("the Municipalities"). **Mičo STANIŠIĆ** participated in the JCE in one or more of the following ways:

- a) Participating in the formation of the Bosnian Serb bodies and forces that implemented the forcible takeovers of the Municipalities and participated in the crimes listed in this Indictment;
- b) Participating in the development of Bosnian Serb policy at the leadership level in order to secure the takeovers of the Municipalities in the targeted territory and the forcible removal of the non-Serb population;
- c) Communicating and co-ordinating with Bosnian Serb political figures at the republic level, particularly Radovan KARADŽIĆ and Momčilo KRAJIŠNIK, as well as political, military and police figures at the regional and municipal levels in order to facilitate the implementation of the objective of the JCE;
- d) Commanding and directing members and agents of the RS MUP who were acting in co-ordination with crisis staffs, the VRS, and other Serb Forces in implementing the objective of the JCE;
- e) Assisting in the co-ordination of joint VRS/RS MUP operations in support of the implementation of the objective of the JCE;
- f) Facilitating the establishment and operation of camps and detention facilities in which Serb Forces beat, killed and sexually assaulted non-Serb detainees;
- g) Failing, while under a duty under the laws and regulations applicable to the Ministry of Internal Affairs to protect the entire civilian population within the areas under the control of Bosnian Serb authorities, to take adequate steps to ensure that RS MUP forces would act to protect the Bosnian Muslim, Bosnian Croat and other non-Serb populations residing in those areas;
- h) Encouraging and facilitating the commission of crimes by Serb Forces against Bosnian Croats, Bosnian Muslims and other non-Serbs by not taking adequate steps to investigate, arrest, and/or punish the perpetrators of such crimes and thereby contributing to the maintenance of a culture of impunity in

respect of such crimes, including by participating in sham inquiries concerning these crimes.

12. **Stojan ŽUPLJANIN** is criminally liable for crimes committed in the period 1 April 1992 to 31 December 1992 in the municipalities of Banja Luka, Donji Vakuf, Ključ, Kotor Varoš, Prijedor, Sanski Most and Teslić (“the ARK Municipalities”). **Stojan ŽUPLJANIN** participated in the JCE in one or more of the following ways:

- a) Participating in the formation of the Bosnian Serb bodies and forces that implemented the forcible takeovers of ARK Municipalities and participated in the crimes listed in this Indictment;
- b) Ordering, commanding and directing members and agents of the RS MUP who were acting in co-ordination with crisis staffs, the VRS, and other Serb Forces in implementing the objective of the JCE;
- c) Participating in the formation, financing, supplying and supporting of special units in the ARK Municipalities which were engaged in implementing the objective of the JCE or which participated in the perpetration of the crimes listed in this Indictment;
- d) Assisting in the co-ordination of joint VRS/RS MUP operations in support of the implementation of the objective of the JCE;
- e) Facilitating, establishing and/or operating camps and detention facilities in which Serb Forces beat, killed and sexually assaulted non-Serb detainees;
- f) Failing, while under a duty under the laws and regulations applicable to the Ministry of Internal Affairs to protect the entire civilian population within the areas in the ARK Municipalities, to take adequate steps to ensure that RS MUP forces would act to protect the Bosnian Muslim, Bosnian Croat and other non-Serb populations residing in those areas;
- g) Encouraging and facilitating the commission of crimes by Serb Forces against Bosnian Croats, Bosnian Muslims and other non-Serbs in the ARK Municipalities by not taking adequate steps to investigate, arrest, and/or punish the perpetrators of such crimes and thereby contributing to the maintenance of a culture of impunity in respect of such crimes, including by participating in sham inquiries concerning these crimes.

13. The crimes enumerated in Counts 1 to 10 of this Indictment were within the objective of the JCE. **Mičo STANIŠIĆ, Stojan**

ŽUPLJANIN and the other members of the JCE shared a common purpose which amounted to or involved the commission of the charged crimes. In addition, each member of the JCE was aware that his or her conduct occurred in the context of an armed conflict and was part of a widespread or systematic attack directed against a civilian population.

14. Alternatively, insofar as the crimes enumerated in Counts 1 to 8 of this Indictment were not within the objective of the JCE, those crimes were the natural and foreseeable consequences of the execution of the JCE and **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** were each aware that such crimes were the natural and foreseeable outcome of the execution of the JCE.

15. Also in the alternative, if **Mičo STANIŠIĆ** was not responsible as a member of the JCE, by each of the acts listed in paragraphs 11(a)-(h) **Mičo STANIŠIĆ** is individually criminally responsible for instigating or aiding and abetting the crimes set out in the Indictment. In this respect the Prosecutor charges **Mičo STANIŠIĆ** with aiding and abetting in relation to the acts set out in paragraphs 11(a)-(h), and with instigation in relation to the acts set out in paragraphs 11(e)-(h).

16. Also in the alternative, if **Stojan ŽUPLJANIN** was not responsible as a member of the JCE, by each of the acts listed in paragraphs 12(a)-(g) **Stojan ŽUPLJANIN** is individually criminally responsible for ordering, planning, instigating or aiding and abetting the crimes set out in the Indictment. In this respect the Prosecutor charges **Stojan ŽUPLJANIN** each with aiding and abetting in relation to the acts set out in paragraphs 12(a)-(g), and with ordering, planning and instigation in relation to the acts set out in paragraphs 12(d)-(g).

Article 7 (3) of the Statute of the Tribunal

17. **Mičo STANIŠIĆ** was the highest authority in the RS MUP. His official responsibility included public and state security. In his capacity as Minister of the RS MUP, **Mičo STANIŠIĆ** had overall authority and responsibility for the functioning of the members and agents of the RS MUP. All members and agents of the RS MUP were subordinate to **Mičo STANIŠIĆ**. He had authority to appoint and dismiss from duty the heads of the units into which the RS MUP was organised, including Police Administration, the CSBs, the National Security Services ("SDB"), the SJBs, reserve police forces, police stations and special police units.

18. **Stojan ŽUPLJANIN**, as Chief of the CSB Banja Luka, was the most senior police officer in the ARK, subordinated only to **Mičo STANIŠIĆ**. **Stojan ŽUPLJANIN** had overall authority and responsibility for the functioning of the members and agents of the RS MUP within the ARK. He was responsible for planning and directing all operations of the police and for monitoring the activities of all subordinate officers and units to ensure that his orders were implemented. **Stojan ŽUPLJANIN** had authority to appoint and dismiss subordinate individuals from duty. He exercised command and control of the RS MUP in the ARK, at times in co-ordination with the VRS, paramilitary forces and volunteer units, the TO, and civilian bodies including regional and municipal crisis staffs.

19. **Stojan ŽUPLJANIN** had operational control over the subordinated municipal and regional members and agents of the RS MUP in the ARK, including those responsible for the operation of detention facilities. He made decisions for the subordinate units; assigned tasks to subordinates; issued orders, instructions and directives; ensured the implementation of his orders and orders issued by the RS MUP and bore full responsibility for their completion. He monitored the situation in the area of responsibility of the CSB Banja Luka; ensured the passage of information to civilian and military bodies at the municipal, regional and republic levels; and was responsible for the overall operational effectiveness and conduct of the police.

20. In addition to his position as the highest police officer in the ARK, **Stojan ŽUPLJANIN** represented the police on the ARK Crisis Staff. Throughout its existence, the ARK Crisis Staff worked to co-ordinate and implement the objective of the JCE in the territory of the ARK. After the dissolution of the ARK Crisis Staff, **Stojan ŽUPLJANIN** continued with the implementation of the plan in his position as Chief of the Banja Luka CSB.

21. **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** both had the authority and the duty to punish or initiate disciplinary proceedings against subordinate members and agents of the RS MUP for any crimes that they may have committed.

22. **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN**, as a consequence of their positions of superior authority described above, are each individually criminally responsible for the acts or omissions of subordinate members and agents of RS MUP pursuant to Article 7(3) of the Statute of the Tribunal. **Mičo STANIŠIĆ**, as Minister of Interior, exercised *de jure* and *de facto* command and control over the members

and agents of the RS MUP who participated in crimes alleged in this Indictment. **Stojan ŽUPLJANIN**, in his capacity as the Chief of the Banja Luka CSB and the police representative on the ARK Crisis Staff, exercised *de jure* and *de facto* command and control over the members and agents of RS MUP in the ARK that participated in the crimes alleged in this Indictment.

23. **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** each knew or had reason to know that crimes alleged in this Indictment were about to be or had been committed by their subordinates, and they failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof. The term “committed” (as used in the context of Article 7(3) of the Statute of the Tribunal) includes all modes by which a crime may be carried out, including but not limited to planning, instigating, committing or aiding and abetting. **Mičo STANIŠIĆ**’s and **Stojan ŽUPLJANIN**’s duties included an obligation to investigate and establish the facts of the crime, to put an end to the criminal activity, to impose appropriate punitive measures on the perpetrator, and to take measures to prevent or deter further criminal acts committed by members and agents of RS MUP.

THE CHARGES

COUNT 1

PERSECUTIONS

24. Between about 1 April 1992 and 31 December 1992, **Mičo STANIŠIĆ**, in concert with other members in the JCE committed, or individually instigated or otherwise aided and abetted the planning, preparation or execution of persecutions on political, racial or religious grounds of the Bosnian Muslim and Bosnian Croat populations in the Municipalities.

Between about 1 April 1992 and 31 December 1992, **Stojan ŽUPLJANIN**, in concert with other members in the JCE committed, or individually planned, instigated, ordered or otherwise aided and abetted the planning, preparation or execution of persecutions on political, racial or religious grounds of the Bosnian Muslim and Bosnian Croat populations in the ARK Municipalities.

25. The acts of persecution for which **Mičo STANIŠIĆ** is criminally responsible, which were carried out by members of Serb Forces, included:

- (a) killings of Bosnian Muslims and Bosnian Croats during and after attacks on villages and non-Serb parts of towns as listed in Schedule A;
- (b) killings related to detention facilities, or committed during transfers to and out of detention facilities, as listed in Schedule B;
- (c) torture, cruel treatment or inhumane acts, including beatings, humiliation, harassment and psychological abuse, at the locations and on the dates listed under 2.1 and 3.4 in Schedule A;
- (d) torture, cruel treatment and inhumane acts in detention facilities, as listed in Schedule D. This treatment included beatings, sexual violence, humiliation, harassment and psychological abuse;
- (e) unlawful detention in detention facilities, as listed in Schedule C;
- (f) the establishment and perpetuation of inhumane living conditions in detention facilities, as listed in Schedule C. These conditions included the failure to provide adequate:
 - accommodation or shelter;
 - food or water;
 - medical care; and
 - hygienic sanitation facilities;
- (g) forcible transfer and deportation of Bosnian Muslims and Bosnian Croats from the Municipalities to areas under the control of the government of the Republic of Bosnia and Herzegovina (including Travnik, Bugojno, Zenica and Sarajevo), to Croatia, to Serbia and to Montenegro. The forcible transfer and deportation started in April 1992 and continued throughout the year 1992;
- (h) the appropriation or plunder of property during and after attacks on villages and non-Serb parts of towns as listed in Schedule F, in detention facilities and in the course of deportations or forcible transfers. The appropriation of property included the practice of forcing Bosnian Muslims and

Bosnian Croats to sign documents transferring title to their real and personal property to Bosnian Serb governmental authorities in order to be allowed to leave the Municipalities;

- (i) the wanton destruction of Bosnian Muslim and Bosnian Croat villages and areas as listed in Schedule F, including the destruction of religious and cultural buildings as listed in Schedule E, and the looting of residential and commercial property in villages and areas as listed in Schedule F;
- (j) the imposition and maintenance of restrictive and discriminatory measures on Bosnian Muslims and Bosnian Croats, which began shortly after the takeovers of power in the municipalities as listed in Schedule G and continued throughout the year 1992. The measures included:
 - the denial of freedom of movement;
 - the denial of employment through removal from positions of authority in local government institutions, the military, and the police and general dismissal from employment;
 - the invasion of privacy through arbitrary searches of homes;
 - the denial of the right to judicial process; and
 - the denial of equal access to public services.

26. The acts of persecution for which **Stojan ŽUPLJANIN** is criminally responsible, which were carried out by members of Serb Forces, included:

- (a) killings of Bosnian Muslims and Bosnian Croats during and after attacks on villages and non-Serb parts of towns as listed in Schedule A.1 through A.3;
- (b) killings related to detention facilities, or committed during transfers to and out of detention facilities, as listed in Schedule B.1 through B.7;
- (c) torture, cruel treatment or inhumane acts, including beatings, humiliation, harassment and psychological abuse, at the locations and on the dates listed under 2.1 and 3.4 in Schedule A;
- (d) torture, cruel treatment and inhumane acts in detention facilities, as listed in Schedule D.1 through D.7. This treatment included beatings, sexual violence, humiliation, harassment and psychological abuse;

- (e) unlawful detention in detention facilities, as listed in Schedule C.1 through C.7;
- (f) the establishment and perpetuation of inhumane living conditions in detention facilities, as listed in Schedule C.1 through C.7. These conditions included the failure to provide adequate:
- accommodation or shelter;
 - food or water;
 - medical care; and
 - hygienic sanitation facilities;
- (g) forcible transfer and deportation of Bosnian Muslims and Bosnian Croats from the ARK Municipalities to areas under the control of the government of the Republic of Bosnia and Herzegovina (including Travnik, Bugojno, Zenica and Sarajevo), to Croatia, to Serbia and to Montenegro. The forcible transfer and deportation started in April 1992 and continued throughout the year 1992;
- (h) the appropriation or plunder of property during and after attacks on villages and non-Serb parts of towns as listed in Schedule F.1 through F.6, in detention facilities and in the course of deportations or forcible transfers. The appropriation of property included the practice of forcing Bosnian Muslims and Bosnian Croats to sign documents transferring title to their real and personal property to Bosnian Serb governmental authorities in order to be allowed to leave the ARK Municipalities;
- (i) the wanton destruction of Bosnian Muslim and Bosnian Croat villages and areas as listed in Schedule F.1 through F.6, including the destruction of religious and cultural buildings as listed in Schedule E.1 through E.6, and the looting of residential and commercial property in villages and areas as listed in Schedule F.1 through F.6;
- (j) the imposition and maintenance of restrictive and discriminatory measures on Bosnian Muslims and Bosnian Croats, which began shortly after the takeovers of power in the ARK Municipalities as listed in Schedule G.1 through G.6 and continued throughout the year 1992. The measures included:

- the denial of freedom of movement;
- the denial of employment through removal from positions of authority in local government institutions, the military, and the police and general dismissal from employment;
- the invasion of privacy through arbitrary searches of homes;
- the denial of the right to judicial process; and
- the denial of equal access to public services.

27. By their acts and omissions, **Mičo STANIŠIĆ** committed, instigated or otherwise aided and abetted, and **Stojan ŽUPLJANIN** committed, planned, ordered, instigated or otherwise aided and abetted, or each by knowing or having reason to know that the crimes were about to be or had been committed by their subordinates and failing to take necessary and reasonable measures to prevent them or to punish the perpetrators, **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** are each criminally responsible for:

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

COUNT 2, 3 and 4

EXTERMINATION and MURDER

28. Between about 1 April 1992 and 31 December 1992, **Mičo STANIŠIĆ**, in concert with other members in the JCE committed, or individually instigated or otherwise aided and abetted the planning, preparation or execution of the extermination and murder of Bosnian Muslims and Bosnian Croats in the Municipalities. In the alternative **Mičo STANIŠIĆ** knew or had reason to know that said extermination and murder was about to be or had been committed and failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof. The extermination and murder was effected by killings during and after attacks on towns and villages as listed in the Schedule A, in detention facilities and during transfers to and from detention facilities as listed in Schedule B. The killings were physically committed by members of the Serb Forces.

29. Between about 1 April 1992 and 31 December 1992, **Stojan ŽUPLJANIN**, in concert with other members in the JCE committed, or individually planned, instigated, ordered or otherwise aided and abetted the planning, preparation or execution of the extermination and murder

of Bosnian Muslims and Bosnian Croats in the ARK Municipalities. In the alternative **Stojan ŽUPLJANIN** knew or had reason to know that said extermination and murder was about to be or had been committed and failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof. The extermination and murder was effected by killings during and after attacks on towns and villages as listed in Schedule A.1 through A.3, in detention facilities and during transfers to and from detention facilities as listed in Schedule B.1 through B.7. The killings were physically committed by members of the Serb Forces.

30. By their acts and omissions, **Mičo STANIŠIĆ** committed, instigated or otherwise aided and abetted, and **Stojan ŽUPLJANIN** committed, planned, ordered, instigated or otherwise aided and abetted, or each by knowing or having reason to know that the crimes were about to be or had been committed by their subordinates and failing to take necessary and reasonable measures to prevent the crimes or to punish the perpetrators, **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** are each criminally responsible for:

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

Count 3: Murder, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(a), 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 of the Geneva Conventions of 1949, 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 5, 6, 7 and 8

TORTURE, CRUEL TREATMENT and INHUMANE ACTS

31. Between about 1 April 1992 and 31 December 1992, **Mičo STANIŠIĆ**, in concert with other members of the JCE committed, or individually instigated or otherwise aided and abetted in the planning, preparation or execution of torture, cruel treatment and inhumane acts inflicted by Serb Forces on the non-Serb population in the Municipalities. In the alternative, **Mičo STANIŠIĆ** knew or had reason to know that said torture, cruel treatment and inhumane acts was about to be or had been committed by Serb Forces on the non-Serb population in

the Municipalities but failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof.

32. Between about 1 April 1992 and 31 December 1992, **Stojan ŽUPLJANIN**, in concert with other members of the JCE committed, or individually planned, instigated, ordered or otherwise aided and abetted in the planning, preparation or execution of torture, cruel treatment and inhumane acts inflicted by Serb Forces on the non-Serb population in the ARK Municipalities. In the alternative, **Stojan ŽUPLJANIN** knew or had reason to know that said torture, cruel treatment and inhumane acts was about to be or had been committed by Serb Forces on the non-Serb population in the ARK Municipalities but failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof.

33. Bosnian Muslims and Bosnian Croats were confined in inhumane conditions and subjected to intentional infliction of severe pain and suffering by beatings, torture, sexual violence, humiliation, harassment, and psychological abuses in camps, police stations, military barracks and other detention facilities as listed in Schedule D, as well as at the locations and on the dates listed under 2.1 and 3.4 in Schedule A, for which **Mičo STANIŠIĆ** is criminally responsible.

34. Bosnian Muslims and Bosnian Croats were confined in inhumane conditions and subjected to intentional infliction of severe pain and suffering by beatings, torture, sexual violence, humiliation, harassment, and psychological abuses in camps, police stations, military barracks and other detention facilities within the ARK Municipalities, as listed in Schedule D.1 through D.7, as well as at the locations and on the dates listed under 2.1 and 3.4 in Schedule A, for which **Stojan ŽUPLJANIN** is criminally responsible.

35. By their acts and omissions, **Mičo STANIŠIĆ** committed, instigated or otherwise aided and abetted, and **Stojan ŽUPLJANIN** committed, planned, ordered, instigated or otherwise aided and abetted, or each by knowing or having reason to know that the crimes were about to be or had been committed by their subordinates and failing to take necessary and reasonable measures to prevent the crimes or to punish the perpetrators, **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** are each criminally responsible for:

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

Count 6: Torture, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3 (1)(a) of the Geneva Conventions of 1949, punishable under Articles 3, 7(1) and 7(3) of the Statute of the Tribunal;

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

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

COUNTS 9 and 10

DEPORTATION and INHUMANE ACTS

36. Between about 1 April 1992 and 31 December 1992, **Mičo STANIŠIĆ**, in concert with other members in the JCE committed, or individually instigated or otherwise aided and abetted the planning, preparation or execution of the deportation and unlawful forcible transfer of tens of thousands of Bosnian Muslims and Bosnian Croats from the Municipalities to areas under the control of the government of the Republic of Bosnia and Herzegovina (including Travnik, Bugojno, Zenica and Sarajevo), to Croatia, to Serbia and to Montenegro. In the alternative, **Mičo STANIŠIĆ** knew or had reason to know that said deportation and unlawful forcible transfer was about to be or had been committed and failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof.

37. In order to achieve this result, for which **Mičo STANIŠIĆ** is criminally responsible, Serb Forces subjugated villages and towns in the areas of BiH which were proclaimed a part of Republika Srpska, and participated with members of the SDS in the disarming of the Bosnian Muslim and Bosnian Croat population. The towns and villages, as listed in Schedule F, including areas in which the inhabitants complied and offered no resistance, were then attacked. These attacks were intended to compel the Bosnian Muslim and Bosnian Croat population to flee. After taking control of the towns and villages as listed in Schedule G, Serb Forces often rounded up the remaining Bosnian Muslim and Bosnian Croat population and forcibly removed them from the area and/or Serb Forces in co-operation with the local Bosnian Serb authorities often imposed restrictive and discriminatory measures on the Bosnian Muslim and Bosnian Croat population and engaged in a campaign of terror

designed to drive them out of the territory. The majority of the Bosnian Muslim and Bosnian Croat population that remained was eventually deported or forcibly transferred from their homes.

38. Between about 1 April 1992 and 31 December 1992, **Stojan ŽUPLJANIN**, in concert with other members in the JCE committed, or individually planned, instigated, ordered or otherwise aided and abetted the planning, preparation or execution of the deportation and unlawful forcible transfer of tens of thousands of Bosnian Muslims and Bosnian Croats from the ARK Municipalities to areas under the control of the government of the Republic of Bosnia and Herzegovina (including Travnik, Bugojno, Zenica and Sarajevo), to Croatia, to Serbia and to Montenegro. In the alternative, **Stojan ŽUPLJANIN** knew or had reason to know that said deportation and unlawful forcible transfer was about to be or had been committed and failed to take necessary and reasonable measures to prevent such acts or to punish the perpetrators thereof.

39. In order to achieve this result, for which **Stojan ŽUPLJANIN** is criminally responsible, Serb Forces subjugated villages and towns in the areas of the ARK which were proclaimed a part of Republika Srpska, and participated with members of the SDS in the disarming of the Bosnian Muslim and Bosnian Croat population. The towns and villages, as listed in Schedule F.1 through F.6, including areas in which the inhabitants complied and offered no resistance, were then attacked. These attacks were intended to compel the Bosnian Muslim and Bosnian Croat population to flee. After taking control of the towns and villages as listed in Schedule G.1 through G.6, Serb Forces often rounded up the remaining Bosnian Muslim and Bosnian Croat population and forcibly removed them from the area and/or Serb Forces in co-operation with the local Bosnian Serb authorities often imposed restrictive and discriminatory measures on the Bosnian Muslim and Bosnian Croat population and engaged in a campaign of terror designed to drive them out of the territory. The majority of the Bosnian Muslim and Bosnian Croat population that remained was eventually deported or forcibly transferred from their homes.

40. By their acts and omissions **Mičo STANIŠIĆ** committed, instigated or otherwise aided and abetted, and **Stojan ŽUPLJANIN** committed, planned, ordered, instigated or otherwise aided and abetted, or each by knowing or having reason to know that the crimes were about to be or had been committed by their subordinates and failing to take necessary and reasonable measures to prevent the crimes or to punish the

perpetrators, **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** are each criminally responsible for:

Count 9: Deportation, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(d), 7(1) and 7(3) of the Statute of the Tribunal;

Count 10: Inhumane Acts (forcible transfer), a **CRIME AGAINST HUMANITY**, punishable under Articles 5(i), 7(1) and 7(3) of the Statute of the Tribunal.

GENERAL ALLEGATIONS

41. All acts and omissions charged as Crimes Against Humanity were part of a widespread or systematic attack directed against the Bosnian Muslim and Bosnian Croat civilian populations of BiH.

42. At all times relevant to this Indictment, a state of armed conflict existed in BiH.

43. At all times relevant to this Indictment, **Mičo STANIŠIĆ** and **Stojan ŽUPLJANIN** were each required to abide by the laws and customs governing the conduct of armed conflicts.

ADDITIONAL POLITICAL AND HISTORICAL FACTS

44. In November 1990, multi-party elections were held in BiH for the first time since the Second World War. There were three main parties, each of which was identified with one of the three principal ethnic groups in BiH. The Party of Democratic Action, (the "SDA"), was identified, in the main, as the party of the Bosnian Muslims; the SDS was identified as the party of the Bosnian Serbs; and the Croatian Democratic Union, (the "HDZ"), was primarily identified as the party of the Bosnian Croats. The SDA won the most seats in the Republic Assembly, followed by the SDS and then the HDZ.

45. The SDS political platform concentrated on the goal of unifying ethnic Serbs in a common state. The election results, however, made apparent the fact that as time went on the SDS would be unable to keep BiH in a Serb-dominated Yugoslavia through democratic and peaceful means alone. As a result, Bosnian Serbs began to organise certain areas of BiH into formal regional structures through the concept of "Associations of Municipalities" which existed under the 1974 Yugoslav

constitutional regime. These Associations, although nominally non-ethnic, were the first step toward establishing separate Bosnian Serb governmental bodies in BiH.

46. On 25 June 1991, Slovenia and Croatia declared their independence from the SFRY. The following day, the JNA was engaged in armed conflict in Slovenia, and fighting broke out in Croatia soon thereafter. In the autumn of 1991, the JNA began to withdraw its forces from Croatia and re-deploy them into BiH. Working in conjunction with certain elements in the JNA, the SDS started arming the Bosnian Serb population of BiH.

47. As early as mid-1991, **Mičo STANIŠIĆ** collaborated with key figures in the Bosnian Serb leadership in formulating and subsequently implementing plans to form a Bosnian Serb MUP.

48. In September 1991, the various Associations of Municipalities were transformed into Serbian Autonomous Districts ("SAOs"), including the transformation, on or about 16 September 1991, of the Association of Bosanska Krajina Municipalities into the ARK. The ARK came to include (among others) the following municipalities: Banja Luka, Prijedor, Sanski Most, Ključ, Kotor Varoš, Teslić, and Donji Vakuf.

49. Around this period of time the SAO of Herzegovina (including the municipalities of Bileća, Gacko, Višegrad), the SAO of Romanija-Birać (including the municipalities of Pale, Vlasenica, Vogošća, Ilijaš), the SAO of Semberija and Majeвица (including the municipalities of Zvornik, Brčko and Bijeljina) and the SAO of Northern Bosnia (including the municipality of Doboј and Bosanski Šamac) were also established.

50. As the war continued in Croatia and it appeared increasingly likely that BiH would also declare its independence, the SDS began in earnest the creation of a separate Serbian entity within BiH together with separate bodies of authority. A separate Assembly of the Serbian People in BiH, dominated by the SDS, was founded on 24 October 1991 as the highest representative and legislative organ of Serbs in BiH. During the first session, Radovan Karadžić made it clear that the Bosnian Serbs were prepared to use force and fear to achieve their ends if they were otherwise unsuccessful.

51. On 19 December 1991, the SDS issued instructions for the "Organisation and Activity of the Organs of the Serbian People in Bosnia

and Herzegovina in Extraordinary Circumstances” which provided a plan for the SDS take-over of municipalities in BiH. The instructions included plans for the creation of crisis staffs.

52. The crisis staffs were modelled on similar entities that had existed as part of the Yugoslavian defence system. They were designed to take over the functioning of the municipalities or republic government during times of war or a state of emergency when the Assembly, normally the highest authority of government, could not function. They were comprised of representatives of the police, military, SDS and government organs. When activated, a crisis staff took over all powers of the municipal assembly.

53. On 9 January 1992, the Bosnian Serb Assembly adopted a declaration on the Proclamation of the Serbian Republic of Bosnia and Herzegovina (“SR BiH”). On 28 February 1992, the Constitution of the Serbian Republic of BiH declared that the territory of that Republic included “the territories of the Serbian Autonomous Regions and Districts and of other Serbian ethnic entities in Bosnia and Herzegovina, including the regions in which the Serbian people remained in the minority due to the genocide conducted against it in World War Two”, and it was declared to be a part of the SFRY. On 12 August 1992, the name of the Bosnian Serb republic was changed to Republika Srpska.

54. On 11 February 1992, a meeting of Serb officials of the BiH MUP was held in Banja Luka. At the meeting, **Mičo STANIŠIĆ** insisted that it was necessary to establish a separate RS MUP at the municipal, regional and republic level. **Stojan ŽUPLJANIN** was present at the meeting.

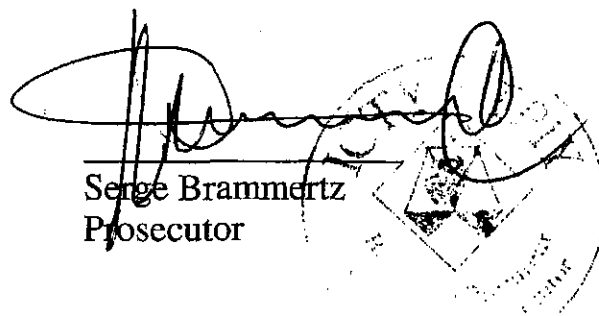
55. On 1 April 1992, pursuant to the Serb Law on Internal Affairs, which was issued on 23 March 1992 and entered into force on 31 March 1992, a separate RS MUP was established with **Mičo STANIŠIĆ** as Minister. According to Article 28 of the Law, CSBs were established in Banja Luka for the ARK, in Trebinje for the SAO of Herzegovina, in Doboj for the SAO of Northern Bosnia, in Sarajevo for the SAO of Romanija-Birać, and in Bijeljina for the SAO of Semberija and Majevisa. As the Chief of the CSB Banja Luka **Stojan ŽUPLJANIN** was directly subordinated to the Minister of the RS MUP. The RS MUP was considered one of the armed forces of the RS.

56. On 12 May 1992, at the 16th session of the Bosnian Serb Assembly, Radovan Karadžić announced the six strategic objectives of

the Serbian people in BiH. In essence, these strategic goals constituted a plan to seize and control territory, establish a Bosnian Serb state, defend defined borders and separate the ethnic groups within BiH.

57. Between 1 April 1992 and 31 December 1992, RS MUP forces under the authority of **Mičo STANIŠIĆ** and, in the ARK, also under the authority of **Stojan ŽUPLJANIN**, acting together with the VRS, the TO and paramilitaries carried out a campaign to disarm the non-Serb population. This campaign was conducted under the guise of action against “Muslim and Croat extremists” or to collect “illegally held weapons”. Although in public statements and publications the disarmament orders were not always expressly directed at the non-Serb populations, in practice only Bosnian Muslims and Bosnian Croats were disarmed. The disarmament campaign was frequently used as a pretext for unlawful armed attacks on non-Serb villages and their inhabitants.

58. At the same time, Serb Forces seized power in those municipalities deemed to pose a threat to the accomplishment of the overall plan to create a Serbian state within BiH. These take-overs initiated a series of events, organised and directed by the RS authorities, including the RS MUP, which by the end of 1992, resulted in the death of thousands and the forced departure of tens of thousands of Bosnian Muslims and Bosnian Croats from those areas.



Serge Brammertz
Prosecutor

Dated this 29th day of September 2008
At The Hague, The Netherlands

Schedule A
Killings not related to detention facilities

Autonomous Region of Krajina		
1. Ključ	1.1 The killing of a number of people in Biljani.	10 July 1992
	1.2 The killing of a number of men in Velagići.	1 June 1992
2. Kotor Varoš	2.1 The killing of a number of men in the settlement of Kotor and on the way from Kotor to the Medical centre in Kotor Varoš and in front of the Medical Centre in Kotor Varoš.	25 June 1992
3. Prijedor	3.1 The killing of a number of people in Kozarac and the surrounding areas.	May and June 1992
	3.3 The killing of a number of people in the villages of the Brdo area including Čarakovo and surrounding areas and Biščani	On or about 20 July 1992
	3.4 The killing of a number of men at the Ljubija football stadium and the surrounding areas	On or about 25 July 1992
Other Serb Autonomous Regions		
4. Višegrad	4.1 The killing of about 70 people in the house of Adem Omeragić on Pionirska street in Nova Mahala in Višegrad	On or about 14 June 1992
5. Vlasenica	5.1 The killing of a number of people in the village of Drum	On or about 2 June 1992

Schedule B
Killings related to detention facilities

Autonomous Region of Krajina		
1. Banja Luka	1.1 A number of non-Serb prisoners suffocated in trucks while being transported from Betonirka detention facility in Sanski Most to Manjača camp	7 July 1992
	1.2 The killing of a number of men in front of the Manjača camp	On or about 6 August 1992
2. Donji Vakuf	2.1 A number of men died as a result of beatings at Vrbas Promet factory or after they were taken away	Between June and August 1992
	2.2 A number of men died as a result of beatings at the TO warehouse	Between June and July 1992
3. Kotor Varoš		
	3.2 A number of men died as a result of beatings in the prison building	Between June and September 1992
4. Prijedor	4.1 The killing of a number of men in "Room 3" at Keraterm camp	On or about 24 and 25 July 1992
	4.2 The killing of a number of people at Omarska camp and at various places after they were taken from the camp	Between 27 May and 21 August 1992
5. Sanski Most	5.1 The killing of a number of men in the area called Hrastova Glavica	On or about 5 August 1992
6. Skender Vakuf	6.1 The execution of a large number of men from the Trnopolje camp at the Vlašić mountain	21 August 1992
7. Teslić	7.1 A number of men died as a result of beatings in the TO warehouse	Between June and July 1992
Other Serb		

Autonomous Regions		
8. Bileća	8.1 A number of men died as a result of beatings in the SUP building in Bileća.	In October 1992
9. Brčko	9.1 The killing of a number of men at the Luka camp.	Between 8 May and 6 June 1992
	9.2 The killing of a number of men at the Partisan Sports Hall in Brčko.	On or about 5 May 1992
	9.3 A number of men were taken out of the Laser Bus Company and killed.	On or about 5 and 6 May 1992
	9.4 The killing of number of men in the SJB building in Brčko and in the surrounding areas of the SJB building in Brčko	On or about 7 May 1992
10. Bosanski Šamac	10.1 The killing of 18 men taken out of the warehouse in Crkvina	During May 1992
11. Pale	11.1 A number of men died as a result of beating in the building of the former Cultural Centre in Pale (also referred to as a gym)	Between June and July 1992
12. Višegrad	12.1 The killing of a number of men on the bank of the Drina river	On or about 7 June 1992
13. Vlasenica	13.1 The killing of a number of men in the Sušica camp	Between June and August 1992
	13.2 The killing of a number of men in the SJB building in Vlasenica	Between May and July 1992
	13.3 The killing of a number of men in the prison building in Vlasenica	Between May and June 1992
	13.4 The killing of a number of men taken away from the Civil Defence Warehouse	Between May and June 1992
14. Zvornik	14.1 The killing of a number of men in the Drinjača school.	On or about 30 May 1992
	14.2 The killing of a number of men at the Čelopek Dom Kulture.	Between 10 and 28 June 1992
	14.3 The killing of a large number of men	Between 1

	at the Karakaj Technical School.	and 5 June 1992
	14.4 The killing of a large number of men at the Gero's slaughterhouse.	Between 5 and 8 June 1992
	14.5 The killing of a number of men taken from the Novi Izvor factory.	Between May and June 1992
15. Gacko	15.1 The killing of a number of men in the power station hotel	At least during June 1992
	15.2 The killing of a number of people on the bridge in the place called Kotlina who were taken from the SJB Gacko	On or about 13 August 1992

Schedule C
Detention Facilities

Municipality	Name and/or location of detention facility	
	Autonomous Region of Krajina	
1. Banja Luka	1.1 CSB building Banja Luka	At least between June and December 1992
	1.2 Manjača camp	Between May and December 1992
2. Donji Vakuf	2.1 SJB building in Donji Vakuf	Between 27 May and mid September 1992
	2.2 TO warehouse building	Between mid-June and mid-September 1992
	2.3 Vrbaspromet warehouse	Between May and mid-September 1992
	2.4 "A house" opposite the SJB building in Donji Vakuf	At least between May and mid-September 1992
3. Ključ	3.1 SJB building in Ključ	At least between May and August 1992
	3.2 Nikola Mačkić Elementary school	At least between 1 May and July 1992
4. Kotor Varoš	4.1 SJB building in Kotor Varoš	At least between 11 June 1992 and August 1992
	4.2 Kotor Varoš prison	Between 11 June 1992 and December 1992
	4.3 Sawmill	At least between the end of June and August 1992
5. Prijedor	5.1 SJB building in Prijedor	Between 24 May and September 1992
	5.2 Omarska camp	Between 27 May and 21 August 1992
	5.3 Keraterm camp	Between 24 May and 5 August 1992
	5.4 Trnopolje camp	Between 24 May and 30 September 1992
	5.5 Miška Glava Dom	Between about 21 and 25 July 1992

	5.6 Ljubija football stadium	On or about 25 July
6. Sanski Most	6.1 SJB building and prison in Sanski Most	At least between 26 May and August 1992
	6.2 Betonirka	At least between June and July 1992
	6.3 Hasan Kikić school sport halls	At least between 26 May and July 1992
7. Teslić	7.1 SJB building	At least between the end of May and October 1992
	7.2 TO warehouse building	At least between the end of May and July 1992
	Other Serb Autonomous Regions	
8. Bileća	8.1 SJB building in Bileća and the building behind the SJB	Between 10 June and December 1992
	8.2 Đački dom in Bileća	At least between mid-June and mid-October 1992
	8.3 Moše Pijade's Barracks	At least between mid-June and July 1992
9. Bosanski Šamac	9.1 SJB building and prison	From 17 April until the end of December 1992
	9.2 Warehouse building in Crkvina	At least during May 1992
	9.4 Mitar Trifunović-Učo primary school	From 17 April until the end of November 1992
	9.5 The TO Headquarters	From 17 April until the end of October 1992
10. Brčko	10.1 SJB building in Brčko	At least from about 7 May until mid July 1992
	10.2 Luka camp	At least from about 7 May until mid July 1992
	10.3 Laser Bus Company building	At least from about 7 May until mid July 1992

	10.4 Brčko Partisan Sports Hall	At least from about 7 May until mid July 1992
11. Doboj		
	11.2 Central Prison	At least between 8 May and December 1992
12. Gacko	12.1 SJB building in Gacko	At least between June and July 1992
	12.2 Power station Hotel	At least during June 1992
13. Ilijaš	13.1 SJB building in Ilijaš	At least during June and July 1992
	13.2 Podlugovi Railway Station	At least during June 1992
14. Pale	14.1 SJB building in Pale	At least between May and July 1992
	14.2 Former Culture Centre in Pale (also Gymnasium)	At least between May and August 1992
15. Vlasenica	15.1 SJB building in Vlasenica	From 22 May
	15.2 The Prison building in Vlasenica	At least between June and July 1992
	15.3 Sušica camp	At least between early June and about 30 September 1992
	15.4 Civil Defence Warehouse	At least between May and July 1992
16. Vogošća	16.1 Plana's house (Planina Kuča) in Svrake	At least from August until December 1992
	16.4 "Bunker" in Vogošća	At least between May and July 1992
18. Zvornik	18.1 SUP building in Zvornik and prison	At least between May and July 1992
	18.2 Čelopek Dom Kulture	At least between May and June 1992
	18.3 Karakaj Technical School	At least between May and June 1992
	18.4 Gero's Slaughterhouse	At least between May and June 1992
	18.5 Novi Izvor company (also known as Ciglana)	At least between May and July 1992
	18.6 Drinjača school building (Dom Kulture)	At least between May and June 1992

	18.7 Ekonomija Farm	At least between May and June 1992
19. Bijeljina	19.1 Batković	At least between June and December 1992

Schedule D
Torture, cruel treatment or inhumane acts in Detention Facilities

Autonomous Region of Krajina		
1. Banja Luka	1.1 CSB building –detainees were beaten by all kind of objects during and after interrogations including a Muslim man who suffered broken ribs and cuts to his face.	From June 1992
	1.2 Manjača - received detainees from various municipalities. Detainees were subjected to regular beatings in areas throughout the camp including outside the make-shift medical clinic, stables and other buildings. Beatings were inflicted by fists, feet, batons, wooden poles, rifle butts and electric cables. In some cases the beatings were so severe as to result in permanent serious injury and deaths.	Between May and end of December 1992
2. Donji Vakuf	2.1 SJB building –detainees were beaten with police batons, electric cables, clubs, chains, steel rods and feet.	From June 1992
	2.2 TO warehouse in Donji Vakuf detainees were beaten with electric cables, bats, rifle butts, fists and feet. Detainees were forced to beat each other. Detainees died as a result of beatings.	Between June and July 1992
	2.3 Vrbas Promet - detainees were beaten with police batons, sticks and fists and subjected to other inhumane acts. Detainees died as a result of beatings.	From June until 17 September 1992
	2.4 “The House” opposite the SJB building – detainees, who were brought from the SJB building, were beaten with fists, rifle butts and police batons and subjected to other inhumane acts.	During June and July 1992
	2.5 At all facilities detainees witnessed the beatings and deaths of other inmates.	
3. Ključ	3.1 SJB building Ključ - detainees were beaten on a regular basis during and outside periods of interrogations. They were beaten by fists, feet, batons, pieces of wood and electric cables. In some cases the beatings were protracted and so severe as to result in serious injury.	At least during May and August 1992
	3.2 Nikola Mačkić Elementary school –detainees	At least

	were beaten on regular basis with all kind of objects. In some cases the beatings resulted in serious injury. Detainees witnessed the beatings of other inmates.	during May and July 1992
4. Kotor Varoš	4.1 SJB Kotor Varoš - detainees were beaten with batons, rifle butts and chair legs. Beatings in some cases were extremely severe and lengthy. Male and female detainees were forced to perform sexual acts with each other. Detainees were tortured and abused during interrogation.	At least between June and September 1992
	4.2 Kotor Varoš Prison detainees were beaten and wounded, often very severely, with wooden bats, rifles, batons, chair legs, electric cables, rubber coated springs with handles, and knives. Some detainees were beaten to death or were executed after their beating.	At least between June and the end of 1992
	4.3 Kotor Varoš Sawmill - the detainees were predominantly non-able-bodied men, women and children. Women were systematically raped and a mentally retarded man was beaten.	At least during August of 1992
5. Prijedor	5.1 SJB Prijedor – detainees were regularly beaten and humiliated during and after interrogations. Some detainees had their bones fractured.	From at least 25 May 1992
	5.2 Omarska Camp – detainees were beaten on arrival at the camp and beaten and tortured both routinely and during interrogation with electric cables, rifle butts, police batons and wooden clubs. Detainees were humiliated and tortured. In numerous cases the beatings were so severe as to result in serious injury, permanent disfigurement and death. Beatings and humiliations were often administered in front of other detainees. Female detainees were raped, men were sexually assaulted.	Between 27 May and 21 August 1992
	5.3 Keraterm Camp – detainees were beaten on arrival at the camp, during interrogations and while they waited to receive food. Beatings were carried out with wooden clubs, baseball bats, electric cables, police batons and rifle butts. Detainees were humiliated and tortured. Certain detainees were singled out for particularly harsh treatment. In numerous cases the beatings were so severe as to result in serious injury, permanent disfigurement and death. Beatings and humiliation were often	Between 25 May and 5 August 1992

	administered in front of other detainees.	
	5.4 Trnopolje Camp - detainees were predominantly women, children and the elderly. However, younger men were also detained. Male detainees were interrogated and beaten. Detainees were beaten in front of other detainees. Female detainees were raped.	At least between 24 May and 30 September 1992
	5.5 Miska Glava community centre – detainees were beaten with police batons and rifle butts in the presence of other detainees. They suffered concussions, bleeding and heavy bruising.	Between about 21 and 25 July 1992
	5.6 Ljubija football stadium detainees were beaten and numerous men were killed. The surviving detainees were forced to load the dead onto a truck.	On or about 25 July
6. Sanski Most	6.1 SJB building – detainees were beaten during and after interrogation with rifle butts, electric cables, poles, feet and fists. In some cases the beatings were so severe as to result in serious injury, permanent disfigurement and death.	At least between 26 May and August 1992
	6.2 Betonirka factory garage – numerous detainees were forced into 3 x 5 meter cells with no ventilation, no toilet facilities, no beds, no running water and with insufficient room to sleep. Detainees were forced to eat tainted food causing severe abdominal pain and dehydration. Detainees were forced to line up and beat other detainees severely. Some detainees were forced to assume a praying position and were beaten severely with wooden chair legs.	Between June and July 1992
	6.3 Hasan Kikić Sport Halls –detainees were beaten on regular basis.	At least between May and July 1992
7. Teslić	7.1 SJB building in Teslić –detainees were beaten with rubber and wooden batons, rifle butts, fists and feet. Detainees witnessed the beatings of other inmates.	At least between May and October 1992
	7.2 Territorial Defence warehouse in Teslić – detainees were beaten with electric cables, baseball bats, pieces of wood, a meat axe, fists and batons and were subjected to other inhumane acts. Prisoners died as a result of these beatings.	At least between May and July 1992

	Detainees witnessed the beatings and deaths of other inmates.	
Other Serb Autonomous Regions		
8. Bileća	8.1 SJB Bileća and prison behind the SJB building - detainees were beaten during and after interrogations with fists, feet, and batons and were subjected to other inhumane acts.	From 10 June until 17 December 1992
	8.2 Dački Dom – detainees were beaten on regular basis; at least three of the detainees was given electric shocks in September 1992.	From 25 June until December 1992
9. Bosanski Šamac	9.1 SJB building and prison – detainees were beaten with batons, rifle butts, electric cable, an iron bar, and with boots. In numerous cases the beatings were so severe as to result in serious injury. Six men were ordered to perform fellatio on each other during May and June 1992. The beating and humiliation took place in presence of their fellow inmates. At least one man died as a result of a beating.	Between 17 April and 21 November 1992
	9.2 Warehouse in Crkvina – detainees were severely beaten with batons, kicked with boots. In numerous cases the beatings were so severe as to result in serious injury. The beating and humiliation took place in presence of their inmates and several men died as a result of beating and shooting.	During May 1992
	9.3 TO headquarters – detainees were severely beaten with batons, and kicked with boots. Teeth were pulled from prisoners. In numerous cases the beatings were so severe as to result in serious injury. The beating and humiliation took place in presence of their fellow inmates.	From 17 April until end of October 1992
10. Brčko	10.1 SJB building – detainees were beaten during interrogations with all kind of objects. Some of the detainees were taken out and executed.	At least during May and June 1992
	10.2 Luka camp – detainees were severely beaten on a regular basis. In numerous cases the beatings	At least between

	were so severe as to result in serious injury and death. The beating and humiliation took place in presence of fellow inmates. Female detainees were raped. Detainees were forced to sexually assault each other.	May and July 1992
	10.3 Laser Bus Company building –detainees were daily beaten with all kind of objects. In numerous cases the beatings were so severe as to result in serious injury and death.	At least during May 1992
	10.4 Brčko Partisan Sports Hall –detainees were beaten on a daily basis. Many of them were bleeding and lost consciousness.	At least during May 1992
11. Doboј		
	11.1 Central Prison – detainees were regularly beaten, and were subjected to ethnic slurs.	At least during May December 1992
12. Gacko	12.1 SJB building –detainees were subjected to beatings during and after interrogation. They were beaten with fists, feet, batons and other objects. They were humiliated and some were beaten to death in the presence of other inmates. At least one woman was raped.	During June and July 1992
	12.2 Power Station hotel – detainees were subjected to severe and regular beatings and sexual humiliation. A number of men died as a result or were executed.	At least during June 1992
13. Ilijaš	13.1 SJB building – detainees were forced to lie down on their stomachs and they were beaten with hands, feet and batons	At least during June and July 1992
	13.2 Podlugovi Railway Station – detainees suffered from the lack of water. On one occasion gas was thrown into the cell.	At least during June 1992
14. Pale	14.1 SJB building – detainees were beaten by slapping and kicking.	Between May and August 1992
	14.2 Former Cultural Centre (Gymnasium) – detainees were regularly beaten and at least three men died as a result.	Between May and August 1992

15. Vlasenica	15.1 SJB Vlasenica – detainees were randomly beaten with a police baton or other similar objects. Some were killed as a result.	At least between May 1992 and July 1992
	15.2 Vlasenica prison – detainees were beaten regularly with all kind of objects including a chair. In numerous cases the beatings were so severe as to result in serious injury, disfigurement and death.	Between June and July 1992
	15.3 Šušica camp – detainees were beaten. Female detainees were raped and on at least one occasion this was done in front of other detainees. Detainees were killed in the presence of fellow inmates.	At least between May and August 1992
	15.4 Civil Defence warehouse – detainees were beaten, insulted and abused constantly. They were beaten with rifle butts, metal bars, and police batons. Some detainees were taken out and obliged to fight among themselves. Some detainees died as a result of beatings. At least 32 men were executed in the place called Nova Kasaba after being taken out of the warehouse.	At least during May 1992
16. Vogošća	16.1 Planjo's house/Planina Kuća – detainees were humiliated and many were executed.	At least between August and October 1992
	16.2 "Bunker" in Vogošća – detainees were taken out and severely beaten. They lost their teeth, they were bleeding and some of them were brought back unconscious. Detainees were ordered to rape each other.	At least during May 1992
17. Zvornik	17.1 Čelopek Dom culture – detainees were beaten and mutilated or otherwise humiliated On one occasion fathers and sons were forced to sexually abuse each other in the presence of fellow inmates. A number of men were killed in the presence of fellow inmates.	At least during June 1992
	17.2 Karakaj Technical School – detainees were regularly beaten with various objects. A number of times they were ordered to beat each other. A number of detainees died as a result of beatings.	At least during May and June 1992
	17.3 Gero's Slaughterhouse – detainees were	At least

	executed and those few who survived were left to suffer without help.	during June 1992
	17.4 Novi Izvor company – detainees were taken out and beaten on a regular basis.	At least during May and June 1992
	17.5 Drinjača school building – detainees were regularly beaten with an iron bar and a wooden stick. Many men lost consciousness during beatings and some died as a result. A number of men were taken out and executed.	At least during May and June 1992
	17.6 Ekonomija farm – detainees were regularly beaten with various objects. Many men lost consciousness during beatings and at least one man died as a result of beatings.	At least between 8 and 12 May 1992

Schedule E
Destruction of cultural monuments and sacred sites

Municipality		
1. Donji Vakuf	Sokolina mesdžid; Šeherdžik mosque; Prusak's three mosques	At least between July and September 1992
2. Ključ	Town mosque; Biljani – Džaferagići mosque; Pudín Han mosque; Velagići mosque; Donji budelj mosque; Humići mosque; Krasulje mosque; Sanica mosque; Town Catholic church	At least between July and August 1992
3. Kotor Varoš	Town Catholic church; Hrvanćani mosque; Hanifići mosque; Old mosque in Večići ; New mosque in Večići; Vrbanjci mosque; Vranić mosque; Ravne mosque; Donji Varoš mosque ; Hadrovci mosque	At least between June and November 1992
4. Prijedor	Kozaruša mosque; Stari Grad mosque; Čarakovo mosque; Hambarine old mosque; Čaršijska mosque – town of Prijedor; Zagrad mosque – town of Prijedor; Biščani mosque; Gornja/Donja Puharska mosque; Rizvanovići mosque; Brežičani mosque; Ališići mosque; Zecovi mosque; Čejreci mosque; Gomjenica mosque; Kevljani mosque; Kamičani mosque; Kozarac – Mutnik mosque; Prijedor town Catholic church; Briševo church	At least between May and December 1992
5. Sanski Most	Town mosque; Pobježje mosque; Hrustovo-Kukavice mosque; Hrustovo-Keranovići mosque; Vrhpolje mosque; Šehovci mosque (November 1992); Trnova mosque; Stari Majdan (Palanka) mosque; Stari Majdan (Utriška) mosque; Dževar mosque; Husimovci mosque; Donji Kamengrad mosque; Skucani Vakuf mosque; Lukavice mosque; Tomina mosque; Čaplje mosque; Town Catholic church	At least between May and December 1992
6. Teslić	Barići mosque; Ružević mosque; Town	At least between

	Catholic church	July and September 1992
8. Bosanski Šamac	Bosanski Šamac town mosque, Bosanski Šamac Catholic church	At least between mid-April and July 1992
9. Brčko	Bijela mosque; Sava mosque; Old Hadži Paša mosque; Dizdaruša mosque; Rijeka mosque; Omerbegova mosque; Palanka mosque; Brčko church; Dubrave church, Gorica church; Poljaci church	At least between May and September 1992
10. Doboj	Gornji Pridjel mosque, Miljkovac old and new mosques, Orašje mosque; Kotorско mosque; Sjenina mosque; Suho Polje mosque; Town mosque in Doboj; Ševarlije mosque; Catholic church in the town of Doboj; Presade church; Johovac church	At least between May and September 1992
11. Gacko	Town mosque	At least between June and August 1992
14. Višegrad	Town mosque Gazanfer Bay; Mosque at Dobrun; Drinska mosque; Bikavac mosque; Međeđa mosque	At least between April and September 1992
15. Vlasenica	Town mosque, Drum mosque	At least between June and September 1992
17. Zvornik	At least 28 mosque including Đulići mosque; Kula Grad mosque; Kozluk mosque, Divić mosque, Snagovo mosque, Novo Selo mosque, Skočić mosque, Svrake mosque, Drinjača mosque, Glumina mosque, Donja Kamenica mosque, Gornja Kamenica mosque, Klisa mosque, Kovačevići mosque, Rijeka mosque, Selimovići mosque	At least between April and November 1992

Schedule F
Attacks on towns and villages

		Dates of attacks
1. Donji Vakuf	Non-Serb parts of the town of Donji Vakuf, Prusac, Doganovci, Torlakovac	At least between May and September 1992
2. Ključ	Non-Serb parts of the town of Ključ, Krasulje, Gornja and Donja Sanica, Crljeni, Draganovići, Pudin Han, Velagići, Biljani, Prhovo	At least between mid-May 1992 and August 1992
3. Kotor Varoš	Non-Serb parts of the town of Kotor Varoš, Vrbanjci, Dabovci, Hanifići, Plitska, Većići	At least between June and August 1992
4. Prijedor	Non-Serb parts of the town of Prijedor, Briševo, Kamičani, Čarakovo, Kozarac, Kozaruša, Biščani, Hambarine, Rizvanovići, Kevljani, Rakovčani	At least between May and August 1992
5. Sanski Most	Non-Serb parts of the town of Sanski Most, Hrustovo, Begići, Lukavice	At least between May and August 1992
6. Teslić	Non-Serb parts of the town of Teslić, Stenjak	At least between June and September 1992
7. Bileća	Non-Serb parts of the town of Bileća, Đeče, Plana, Kravača, Njeganovići	At least during June and July 1992
8. Bosanski Šamac	Non-Serb parts of the town of Bosanski Šamac	At least between mid-April and June 1992
9. Brčko	Non-Serb parts of the town of Brčko	At least between May and August 1992
10. Doboj	Non-Serb parts of the town of Doboj	At least between May and September 1992
11. Gacko	Non-Serb Parts of the town of Gacko, Fazlagić Kula, Čemerno	At least between April and August 1992
12. Ilijaš	Non-Serb parts of the town of Ilijaš, Lješevo, Gornja Bioča	At least between the end of April and August 1992

13. Pale	Non-Serb parts of the town of Pale, Renovica	At least between April and July 1992
14. Vlasenica	Non-Serb parts of the town of Vlasenica, Drum	At least between April and August 1992
15. Vogošća	Non-Serb parts of the town of Vogošća, Svrake	At least between April and September 1992
16. Višegrad	Non-Serb parts of the town of Višegrad, Bikavac	At least between April and August 1992
17. Zvornik	Non-Serb parts of the town of Zvornik, Rašidov Han, Drinjača, Kozluk, Divić, Sapna, Kovačevići	At least between April and September 1992

Schedule G
Takeovers of power in the municipalities

1. Donji Vakuf	Beginning of May 1992
2. Ključ	On or about 7 May 1992
3. Kotor Varoš	On or about 10 June 1992
4. Prijedor	On or about 30 April 1992
5. Sanski Most	Mid-April 1992
6. Teslić	Beginning of June 1992
7. Bileća	On or about 10 June 1992
8. Bosanski Šamac	Mid April 1992
9. Brčko	On or about 30 April 1992
10. Doboј	On or about 2 May 1992
11. Gacko	At the beginning of April 1992
12. Ilijaš	Mid-May 1992
13. Pale	End of March 1992
14. Vlasenica	On or about 21 April 1992
15. Višegrad	Mid-April 1992
16. Vogošća	End of April 1992
17. Zvornik	On or about 9 April 1992