

UNITED NATIONS

International Tribunal for the
Prosecution of Persons
Responsible for Serious Violations of
International Humanitarian Law
Committed in the Territory of
former Yugoslavia since 1991

Case No. IT-95-5/18-T

Date: 23 September 2014

IN TRIAL CHAMBER III

Before:

Judge O-Gon Kwon, Presiding
Judge Howard Morrison
Judge Melville Baird
Judge Flavia Lattanzi, Reserve Judge

Registrar:

Mr John Hocking

THE PROSECUTOR

v.

RADOVAN KARADŽIĆ

PUBLIC

**NOTICE OF FILING PUBLIC REDACTED VERSION OF
PROSECUTION FINAL TRIAL BRIEF**

The Office of the Prosecutor:

Mr Alan Tieger
Ms Hildegard Uertz-Retzlaff

The Accused:

Mr Radovan Karadžić

Stand-by Counsel:

Mr Richard Harvey

THE INTERNATIONAL CRIMINAL TRIBUNAL
FOR THE FORMER YUGOSLAVIA

Case No. IT-95-5/18-T

THE PROSECUTOR

v.

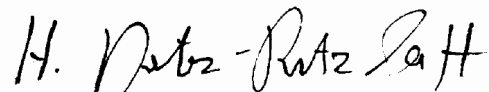
RADOVAN KARADŽIĆ

PUBLIC

**NOTICE OF FILING PUBLIC REDACTED VERSION OF PROSECUTION
FINAL TRIAL BRIEF**

1. The Prosecution hereby files the public redacted version of its Final Trial Brief.¹ Attached to the public redacted version of the Prosecution's Final Trial Brief are public redacted versions of the Appendices E to J. Confidential testimony and exhibits under seal have been redacted from the Brief and the Appendices. The Prosecution will file public redacted versions of the Appendices A to D as soon as possible.

Word Count: 94



Hildegard Uertz-Retzlaff
Senior Trial Attorney

Dated this 23rd day of September 2014
At The Hague
The Netherlands

¹ *Prosecutor v. Radovan Karadžić*, Case No.IT-95-5/18-T, Prosecution's Submission of Final Trial Brief, 29 August 2014.

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CONFIDENTIAL WITH CONFIDENTIAL APPENDICES

PROSECUTION'S FINAL TRIAL BRIEF

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I. OVERVIEW

1. Throughout the conflict, Radovan **KARADŽIĆ**—President of the SDS, President of the Presidency, sole President and Supreme Commander of RS—was the pre-eminent political and military leader of the Bosnian Serbs and their forces. During that time, he spearheaded the criminal plan to permanently forcibly remove Bosnian Muslims and Croats from targeted portions of BiH and a number of separate but related criminal plans, in service of his vision of a Bosnian Serb state free of perceived historical enemies.

2. In the face of Yugoslavia's dissolution and the risk that Serbs in BiH would be left in an independent BiH, the solution of **KARADŽIĆ** and other Bosnian Serb and Serb leaders was to create an ethnically-separate Bosnian Serb entity. Under his formidable and often direct control, the SDS created parallel government structures, armed Bosnian Serbs and galvanised them for what **KARADŽIĆ** increasingly characterised as a looming existential conflict.

3. Although the envisioned Serb state was to be as ethnically pure and free of its perceived enemies as possible, the scope of its intended territory was vast, including areas which were heavily intermixed and where non-Serbs were a majority. These objectives could only be resolved by the forcible removal of the undesired people from the desired territory. Under the direction of **KARADŽIĆ** and his associates, civilian, military and paramilitary organs collaborated to take over municipalities and territories throughout BiH in order to establish Serb control and permanently remove non-Serbs by force or threat of force.

4. The physical takeovers of the targeted municipalities began in late March 1992, and continued over the ensuing days and weeks. During and after these takeovers, Serb Forces and authorities, acting under the direction and control of **KARADŽIĆ** and his associates, killed thousands, brutalised many thousands more and expelled hundreds of thousands, while countless more fled in fear for their lives. To ensure the permanence of the non-Serb departure and in many instances seal the destruction of their historic communities, **KARADŽIĆ**'s forces often torched their homes and systematically destroyed their national/religious sites. Over the ensuing months, most non-Serbs would be "cleansed" from the territories claimed by the Bosnian Serb leadership ("BSL").

5. While leading this overarching campaign of permanent removal, **KARADŽIĆ** also led and oversaw three other discrete criminal plans, all of which were related to, and ultimately furthered, the objective of the overarching campaign.

6. Between April 1992 and November 1995, **KARADŽIĆ** led the planning, preparation and execution of a campaign of sniping and shelling against the besieged city of Sarajevo in order to spread terror among its civilian population. Residential areas were subjected to massive bombardments, random routine shelling and highly-destructive/highly-inaccurate modified airbombs. Fear pervaded daily life—the most mundane acts such as crossing the street or fetching water carried the risk of death. **KARADŽIĆ** and Ratko MLADIĆ were key participants in this plan, which also involved other Bosnian Serb political and military leaders. The BSL's ability to modulate the level of terror was used, among other things, as a bargaining chip to secure concessions from the Bosnian Government and the international community, as a means of exacting revenge for events within Sarajevo or elsewhere, and to prevent BiH from becoming a viable independent state.

7. By mid-1995, Srebrenica was one of the last remaining Bosnian Muslim enclaves in Bosnian Serb-held territory. On 6 July 1995, Bosnian Serb Forces under the direction and control of **KARADŽIĆ** and MLADIĆ attacked Srebrenica and on 11 July took over the enclave. Within days, pursuant to the purpose shared by **KARADŽIĆ**, MLADIĆ and others to eliminate the Bosnian Muslims in Srebrenica, the VRS, the MUP and **KARADŽIĆ**'s civilian officials forcibly transferred Bosnian Muslim women, young children and very elderly, and murdered in organised executions over 7,000 Bosnian Muslim men and boys.

8. In May and June 1995, **KARADŽIĆ**, MLADIĆ and others formulated and implemented a plan to take UN personnel hostage in order to prevent further NATO air strikes against Bosnian Serb military targets. The air strikes had been a response to violation of the weapons total exclusion zone ("TEZ") and Bosnian Serb shelling of civilian areas. VRS and MUP forces captured over 200 UN peacekeepers and military observers, detained them at various locations, including those with strategic or military significance to the BSL, and threatened to kill or harm them if there were further airstrikes.

9. As described in this brief (“Brief”), **KARADŽIĆ** is criminally responsible for the crimes charged in the Indictment¹ through his participation in each of these criminal plans.²

10. The structure of the body of this Brief is as follows:

- Section II: Evaluation of Evidence
- Section III: Overarching JCE
- Section IV: Sarajevo JCE
- Section V: Srebrenica JCE
- Section VI: Hostages JCE
- Section VII: Alternate Modes of Liability
- Section VIII: Sentencing

11. The Brief’s appendices are structured as follows:

- Appendix A: Municipality Summaries, which provide a narrative account of events in each charged municipality.
- Appendix B: Municipality Scheduled Incidents Charts (“SICs”), which detail the proof for each of the charged incidents in Schedules A, B, C and D of the Indictment.
- Appendix C: Sarajevo Scheduled Incident Summaries (“SISs”), which summarise the evidence in each of the charged incidents in Indictment Schedules F and G.
- Appendix D: Srebrenica Narrative, which provides a narrative account of the crimes charged in respect of the Srebrenica JCE.
- Appendix E: VRS Organisational Charts, describing the VRS’s organisational structure in July 1995.
- Appendix F: Defence Witness Credibility Charts (“DCCs”), discussed below.³

¹ *Prosecutor v. Radovan Karadžić*, Case No.IT-95-5/18-PT, Third Amended Indictment, 27 February 2009 (Marked-up version filed on 19 October 2009).

² *Stakić* AJ, paras.64-65; *Brdanin* AJ, paras.410-413.

³ See II: Evaluation of Evidence.

- Appendix G: Municipality Scheduled Incidents Victims List, detailing the evidence of proof of death of victims of the incidents charged in Indictment Schedules A and B. The evidence in this list is duplicative of that cited in the SICs, however in this list it is broken down by victim.
- Appendix H: Sarajevo Scheduled Incidents Victims List, detailing the evidence of proof of death or injury of victims of the incidents charged in Indictment Schedules F and G. Again, the evidence in this list is duplicative of that cited in the SISs, however in this list it is broken down by victim.
- Appendix I: Glossary of terms used in the Brief.
- Appendix J: Index of individuals referred to in the Brief.⁴

II. EVALUATION OF EVIDENCE

12. During the ICTY investigation against him, **KARADŽIĆ** sought to obstruct the course of justice by directing his subordinates and associates to destroy documents evidencing his guilt for the charged crimes.⁵

13. In February 1998, for example, **KARADŽIĆ** instructed an SDS associate—in connection with a visit by ICTY investigators—to "select those [documents] favourable to us and detrimental to the Muslims. Nothing else exists because the archives have been moved, destroyed and so forth [...] The best would be if the archives did not exist at all because the party was frozen for a year."⁶ He continued:

There are many statements that go to my and our advantage. Everything else needs to be darkened out, it doesn't exist. [...] Invite [Sanski Most SDS President] VRKEŠ to come and see you, show him this letter, and tell him about our other contacts, and have him do everything—in person, not through telephone or letter—to have the archives in municipalities cleared out so they wouldn't go to hell, or some of them wouldn't be pursued for a trifle, or not to spoil what's being worked on centrally.⁷

⁴ As Appendices E, G, H, I and J are duplicative of information in the brief and/or non-argumentative, they have not been included in the word count.

⁵ [REDACTED]; P6489/[REDACTED] (duplicates); P6291; [REDACTED].

⁶ P6490,p.1.

⁷ P6490,pp.1-2.

KARADŽIĆ made his policy crystal clear: "we should be discretely obstructing them, except on TV, but there, too, [we should] only give what serves our purpose."⁸ In the same letter, **KARADŽIĆ** instructed his associate to "stress [...] firmly" the need for SDS members to toe the party line in relation to his defence strategy.⁹

14. Throughout trial, **KARADŽIĆ** continued to obfuscate, mislead and seek to conceal evidence of his criminal responsibility; his loyal followers continued to assist him in so doing.

15. In his direct and re-direct examinations, and despite repeated admonition from the Trial Chamber,¹⁰ **KARADŽIĆ** persistently asked blatantly leading questions in a transparent effort to elicit favourable responses.¹¹ As one Defence witness stated in response to **KARADŽIĆ**'s question in re-direct examination: "In your question, Mr. President, you've already provided the answer."¹²

16. Equally, many Defence witness statements contained questions formulated in an obviously leading manner,¹³ or which invited the witness to draw conclusions favourable to **KARADŽIĆ** on legal issues.¹⁴

17. Meanwhile, **KARADŽIĆ**'s in-court efforts to manipulate the trial record¹⁵ were matched by out-of-court efforts to manipulate Defence Rule 92*ter* statements. For example, some Defence witnesses clearly had not seen or professed to be unaware

⁸ P6490,p.2.

⁹ P6490,p.1, stating "Crisis Staffs were organised by municipal bodies, remember that, and stress it firmly to them, it was the municipal bodies elected in the 1990 elections, and not the party."

¹⁰ See e.g. T.30891; T.33238; T.39087.

¹¹ See e.g. T.31709.

¹² J.KEVAC:T.46245.

¹³ See e.g. B.TADIĆ:D4163,paras.21-22,27-29; V.NIKOLIĆ:D4214,paras.5,7-8,10-11,24; M.ORLOVIĆ:D4294,paras.5-7,18-24,26,28,33-39,42,47,49; B.MANDIĆ:D4229,paras.11,18-19; Č.ŠIPOVAC:D4230,paras.6,12-14; Ž.MEJAKIĆ:D4138,paras.4-7,12-24,26-27.

¹⁴ See e.g. B.TADIĆ:D4163,paras.21-22,27-29; Č.ŠIPOVAC:D4230,paras.12-14; Ž.MEJAKIĆ:D4138,para.29; M.ORLOVIĆ:D4294,paras.43-45.

¹⁵ Examples from the trial record include: T.2729-2730 (**KARADŽIĆ** misrepresenting the witness's evidence on a document shown to him); [REDACTED] T.24012-24013 (**KARADŽIĆ** misrepresenting the record by claiming that a particular witness who had survived a mass execution had survived the breakthrough); T.40991 (**KARADŽIĆ** asking a misleading question which suggested that Manjača camp was in operation for the entire duration of the war); T.41770 (**KARADŽIĆ** misrepresenting the record by stating that there were no executions before 14 July 1995); T.43721 (**KARADŽIĆ** mischaracterising in his re-direct examination what had been put to the witness in cross-examination); T.43723 (**KARADŽIĆ** mischaracterising in his re-direct examination what had been put to the witness in cross-examination); T.45283-45284 (**KARADŽIĆ** mischaracterising in his re-direct examination what had been put to the witness in cross-examination); T.45298 (**KARADŽIĆ** mischaracterising in his re-direct examination what had been put to the witness in cross-examination).

of exhibits described in their statements.¹⁶ [REDACTED]

[REDACTED] Some statements contained identical passages.¹⁸ Another witness's evidence was "summarised" in his statement in a manner favourable to **KARADŽIĆ**.¹⁹

18. The witnesses that **KARADŽIĆ** called were, in their vast majority, demonstrably lacking in credibility. With a handful of exceptions, their testimony was confused, contradictory, vague, evasive, and often plainly absurd. Most were members of the civilian and military authorities deeply implicated in the events about which they testified, and they were plainly attempting to minimise their personal role and **KARADŽIĆ**'s role as their superior. Some openly-acknowledged their devotion to **KARADŽIĆ**. One witness told **KARADŽIĆ**, "[y]ou are our president for all times, forever",²⁰ and declared him deserving of a Nobel peace prize.²¹ Another agreed he had previously called **KARADŽIĆ** "the herald of Serbian freedom and the creator of Republika Srpska, as well as the chivalrous king who will not surrender."²²

19. A detailed analysis of Defence witness credibility is set out in the DCCs. These charts are not exhaustive. Rather, they contain representative examples of Defence witness claims that are contradicted by their own statements or by other reliable evidence, and other credibility or reliability issues which demonstrate these witnesses' lack of credibility. Many Defence witnesses were not challenged on aspects of their evidence that were contradicted by a wealth of evidence led by the Prosecution. This does not indicate that the Prosecution accepts the witness's evidence on these points. Rather, the Prosecution relies on the totality of the evidence presented at trial, which contradicts or undermines those witnesses' claims. The small number of Defence witnesses for whom no DCCs have been offered fall into one of three categories: (i) witnesses whose evidence is of such marginal relevance and/or witnesses who are so manifestly lacking in credibility that no DCC is merited;²³ (ii)

¹⁶ See e.g. M.SOSIĆ:D3138,para.5; M.SOSIĆ:T.35779; V.KUPREŠANIN:T.43473-43478; N.ERCEG:T.44080-44083.

¹⁷ [REDACTED]

¹⁸ See e.g. P6565. See also M.MILINČIĆ:T.44967-44972,44979-44981; P6184; M.KIČANOVIĆ:T.34879-34881.

¹⁹ M.STAKIĆ:T.45270.

²⁰ M.NEDIĆ:T.45858.

²¹ M.NEDIĆ:T.45879.

²² K.ČAVOŠKI:T.37114; P6289.

²³ Ž.MALINOVIĆ; A.PIKULIĆ; M.PEJIĆ; V.LUBURA; M.ŠOŠIĆ; V.MATOVIĆ; I.MIŠČEVIĆ; M.ANDELKOVIĆ-LUKIĆ; M.ANDOLINA; V.MARIĆ; T.PLJEVALJIĆ; N.KONDIĆ;

witnesses whose credibility is addressed elsewhere in the Brief;²⁴ and (iii) witnesses whose credibility the Prosecution does not challenge.²⁵

20. Despite the demonstrably low credibility of evidence aimed at exculpating the witness and/or assisting **KARADŽIĆ**, Defence witnesses at times owned up to the truth, sometimes by way of a prior statement, other times under the pressure of cross-examination, and occasionally willingly. Although the credibility of these witnesses was generally low, the reliability of their admissions—upon which the Prosecution relies—is reflected by: the fact that they went against the interests of the witness and/or the interests of **KARADŽIĆ**; arose in circumstances reflecting their reliability—such as upon being confronted with contemporaneous documents contradicting the witness; and/or are corroborated by other reliable evidence.

21. Equally, the Prosecution also relies on evidence from insider witnesses called by the Prosecution or the Trial Chamber. As with Defence insider witnesses, the testimony of some of these witnesses was clearly influenced by a desire to minimise their own responsibility and/or a continued loyalty to **KARADŽIĆ**.²⁶ While the Chamber should disregard obvious attempts by these witnesses to exculpate themselves or assist **KARADŽIĆ**, it should give weight to their against-interest admissions, previous statements given in circumstances which support their reliability and/or evidence which is reliably corroborated.

R.PANDUREVIĆ; Z.SALIPUR; D.ĐENADIJA; Č.ŠIPOVAC; Z.TORBICA; D.VUJIĆ; G.SIKIRAŠ; Y.BATAILLE; Lj.BEARA; Z.TOLIMIR; M.KARADŽIĆ; KW-012; M.MANDIĆ; M.TODOROVIĆ.
²⁴ M.POPARIĆ; Z.SUBOTIĆ; P.UŠČUMLIĆ.

²⁵ Y.AKASHI; E.DUBANT; D.ALLSOP; M.GAUTHIER; E.DUBANT; V.HAYES; P.CONWAY.

²⁶ See e.g. M.MANDIĆ:T.4548-4551, in which MANDIĆ sought to deny knowledge the civilians were exchanged through the Exchange Commission despite his previous testimony to the contrary and documentary evidence he had previously accepted as true. In another such example, KDZ555 blatantly attempted to assist **KARADŽIĆ** with his evidence. Although he had testified in several previous cases and had given several previous statements, in his examination-in-chief, KDZ555 claimed to have forgotten much of his previous testimony/statements. KDZ555:T.17225-17226; [REDACTED]. In cross-examination, he agreed to virtually every proposition **KARADŽIĆ** put to him, including compound, complex questions that included matters about which the witness could have known very little: See e.g. KDZ555:T.17331-17336,17340. Another Prosecution witness deeply implicated in the events about which he testified, PRSTOJEVIĆ, repeatedly sought to minimise his own liability, as exemplified by his confused and contradictory claims regarding his inculpatory 17th Assembly session speech. N.PRSTOJEVIĆ:T.12923-12925,13017-13020,13242-13243,13552-13556.

III. OVERARCHING JCE

A. Overview of Overarching JCE

22. In municipality after municipality, Serb Forces acting under the direction and control of **KARADŽIĆ** and his associates pressured, rounded up, killed and forcibly expelled Bosnian Muslims and Croats in pursuit of the common purpose to permanently remove them from Serb-claimed territories. ICRC President Cornelio SOMMARUGA gave the world "the sad picture":²⁷

The civilian population is systematically harassed; thousands of civilians are arrested in their homes, brutalized or even killed. Whole minority groups comprising tens of thousands of civilians are systematically transferred by force or, as is currently the case in Sanski Most, driven without any protection towards and across the front lines. Hundreds of thousands of civilians have been besieged for several months in cities such as Bihać, Bosanski Brod, Derventa, Goražde and Sarajevo. Detainees, the majority of whom are civilians, are held in conditions of extreme hardship in places of detention which are totally inadequate for the purpose. They are ill-treated and hundreds of them have been executed, either in places to which the ICRC has been denied access or in places it has been allowed to visit only after the executions had stopped.²⁸

The Bosnian Serb ethnic cleansing campaign was "like a broom sweeping dust in front of it".²⁹ The goal was unmistakable, reflected in the thorough devastation of Muslim and Croat cultural objects³⁰ in order to "destroy the faith so that people wouldn't go back."³¹

23. The BSL was determined to form an ethnically Serb state from large portions of BiH where ethnicities were intermingled including areas where Muslims and Croats formed a majority. This "couldn't come about except by forcible means."³²

24. The result was "a policy of ethnically cleansing the territories which they conquered and removing the non-Serb populations from most of those territories".³³ **KARADŽIĆ** explained that since it was impossible for Serbs to live with the other

²⁷ P807,p.2.

²⁸ P807,pp.2-3.

²⁹ P.TUCKER:T.23201.

³⁰

³¹ P.RADIĆ:P1,pp.106-107. See also P1379,p.72;

³² H.OKUN:P776,pp.211-212.

communities, it was better to separate and homogenise; he sought a homogeneously-Serb territory on 70% of BiH.³⁴ **KARADŽIĆ** openly admitted that the basic Serb aim was to redistribute BiH's population so that Serbs would control a single continuous block of territory embracing the entire border with Montenegro and Serbia and including all traditionally Serb-inhabited areas.³⁵

25. The common purpose was clear from the fact that it was implemented in "every area of Republika Srpska wherever the SDS was in power"; it "could not have happened spontaneously in such an identical way everywhere".³⁶ The "policy was to displace the Muslims from the territory of Republika Srpska in an organised, planned and systematic fashion".³⁷ Local authorities "did nothing more or other than putting in place the instructions they had been given."³⁸

26. Expulsions were "one of the ways through which those war objectives were pursued. The expulsions also created facts on the ground that would become very hard to reverse through a political process."³⁹ BANBURY concluded "from the course of events over the entire war that ethnic-based expulsions were clearly one of the policies of the Bosnian Serb authorities."⁴⁰ Similarly, KIRUDJA reached the "inescapable" conclusion that local SDS officials were acting under policy or instruction."⁴¹

B. KARADŽIĆ shared the common purpose of a JCE to permanently and forcibly remove Bosnian Muslims and Croats from Bosnian Serb-claimed territories

27. The common purpose to permanently and forcibly remove non-Serbs from Bosnian Serb-claimed territories was grounded in the convergence of territorial aspirations and the goal of ethnic separation. The BSL—particularly **KARADŽIĆ**—

³³ R.DONIA:T.3143, referring to the Sarajevo area.

³⁴ [REDACTED]. See also H.OKUN:T.1474-1475; H.OKUN:P776,pp.23-24.

³⁵ D.HARLAND:P820,para.269.

³⁶ M.DAVIDOVIĆ:T.15536.

³⁷ M.DAVIDOVIĆ:D1450,p.21. See also [REDACTED].

³⁸ M.DAVIDOVIĆ:T.15536-15537.

³⁹ A.BANBURY:T.13337-13339. See further III.B.4.(d): **KARADŽIĆ**'s exploitation of the results of the cleansing campaign evidences the common criminal purpose.

⁴⁰ A.BANBURY:T.13341.

⁴¹ C.KIRUDJA:P3804,para.79.

emphasized:

- the perceived threat presented by non-Serbs;
- the alleged impossibility of living together and the need to separate;
- the Bosnian Serbs' alleged entitlement to vast areas of land;
- the benefits of creating favourable facts on the ground; and
- the need to cement the results of ethnic separation.

1. The goal of ethnic separation

28. As BiH moved inevitably towards independence, **KARADŽIĆ** and other key members of the BSL became adamant that Serbs could not live with Muslims and Croats in BiH. Although he had stressed in 1990 that "the Serbs and the Muslims will always live in a common state, and they knew how and they will know in future how to live together",⁴² **KARADŽIĆ** later insisted that "[w]e lived together only when occupied or under a dictatorship."⁴³ Muslims and Serbs were like "oil and water",⁴⁴ "a dog and a cat",⁴⁵ "plants which cannot grow side by side".⁴⁶ If you "put them in one pot", the soup would not mix.⁴⁷

29. Muslims were depicted as not only inherently incompatible with Serbs, but posing a demographic threat. **KARADŽIĆ** warned his followers that Muslims "will overwhelm you with their birth rate and their tricks",⁴⁸ a "recurring theme" he repeated to internationals.⁴⁹

30. **KARADŽIĆ** perceived even a minority as a threat. Serbia, with "only 66% Serbs",⁵⁰ was an example to be avoided. "In all variants we must be cautious so that the [Muslims] don't wind up in our state. The fact that Serbs account for only 65% of

⁴² D269,p.8.

⁴³ P5596,p.1; P12,p.19.

⁴⁴ P5596,p.1.

⁴⁵ P939,p.1.

⁴⁶ D304,p.8.

⁴⁷ P12,p.19.

⁴⁸ P938,p.36.

⁴⁹ H.OKUN:P776,pp.29-30,34; D1284,p.23.

⁵⁰ D92,p.85.

Serbia makes it unstable."⁵¹

31. **KARADŽIĆ** insisted that "Muslims cannot live with others. We must be clear on that."⁵² Like the "Christians in Lebanon"⁵³ or the Hindus, "[t]here can be no discussion"—"we cannot live together".⁵⁴ He insisted that Serbs faced an existential threat from Muslims who sought an Islamic state and the physical destruction of the Serbs.⁵⁵ Muslims were depicted as "Turks" or otherwise cast as historical enemies.⁵⁶ He aligned Croats—the other historical enemy—with the WWII "Ustasha".⁵⁷ **KARADŽIĆ** instructed his followers to "aim for as much separation as possible".⁵⁸

32. These metaphors and demographic comparisons plainly refer to physical separation of populations, not administrative separation of power. Any doubt about that is resolved by **KARADŽIĆ**'s open acknowledgment to internationals that he sought ethnically-homogeneous Serb territories.⁵⁹

33. The BSL insisted that Serb-claimed territories had to be "clean" or "pure". **KARADŽIĆ**⁶⁰ and **KRAJIŠNIK**⁶¹ both emphasised that, in **KARADŽIĆ**'s words, "[t]he Drina should be clean".⁶² Equally, **KRAJIŠNIK** stated in respect of Banja Luka, that "we must have that territory clean",⁶³ while **KARADŽIĆ** stated that with the enemy in the Krajina, it "would take on an appearance of a rotten apple".⁶⁴ With reference to a Muslim-allocated area in Prijedor on the Cutileiro map, coloured in green, **KARADŽIĆ** stated that "a green stain has appeared here".⁶⁵ He referred to massacres of Serbs of that area in WWII and stated that "all the people here" will "not

⁵¹ P1485,p.89.

⁵² P938,p.36.

⁵³ D92,p.86.

⁵⁴ P938,p.36; D92,p.86. *See also* A.BANBURY:P2451,para.153; P2493,p.7.

⁵⁵ *See e.g.* P5492,pp.5-6; D92,pp.85-86.

⁵⁶ *See e.g.* P970,p.332; P1385,p.109; P1396,pp.7-8.

⁵⁷ *See e.g.* P956,pp.3-4; P1388,p.231; P1403,pp.320-321.

⁵⁸ D86,p.41. **KARADŽIĆ** frequently referred only to the demographically predominant group of Muslims in such contexts. The record reveals, however, that he and other members of the BSL considered both Muslims and Croats as enemies and that separation from both communities was vital. *See e.g.* P1394,p.76; P1385,pp.47-49; P4442; P1367,p.34.

⁵⁹ [REDACTED]; H.OKUN:T.1474-1475; H.OKUN:P776,pp.23-24; D.HARLAND:P820,para.269.

⁶⁰ P988,p.68.

⁶¹ P1377,p.49.

⁶² P988,p.68.

⁶³ P1379,p.48.

⁶⁴ P1394,p.12.

⁶⁵ P6134,p.2.

allow that to happen to the Serbs here".⁶⁶ KRAJIŠNIK proclaimed before the Assembly that everything he did, he did "for pure areas" of BiH.⁶⁷

34. All Bosnian Serb leaders were consistent in their position that physical separation was needed and the communities could not live together.⁶⁸ KOLJEVIĆ was explicit that the ethnic communities could not live together and the Serbs should just expel the Muslims; his views were "very evident at some of the most important meetings and gatherings."⁶⁹ LUKIĆ, the second RS Prime Minister, advised FRY officials to ethnically cleanse and kill their Muslims as soon as possible because they could not be trusted.⁷⁰

2. Territorial aspirations of the BSL

35. **KARADŽIĆ** and the BSL claimed vast areas of BiH. At the outset of the war, **KARADŽIĆ** revealed that the Bosnian Serbs sought 70% of Bosnian territory, and illustrated their aspirations using a map⁷¹ similar to KRAJIŠNIK's late-1992 map showing Serb-held areas.⁷²

36. The BSL's territorial claims encompassed territories—as stated in their own Proclamation of the RS⁷³—"in which the Serbian people is now a minority due to the genocide carried out against it in World War II".⁷⁴ **KARADŽIĆ** told internationals that these were areas to which the Serbs were entitled⁷⁵ and which should return to Serb hands.⁷⁶

37. These were not theoretical or academic assertions, but a basis for actions realised in municipality after municipality. For example, at a January 1993 Assembly, Prijedor SDS representative Srda SRDIĆ was "shocked" by the prospect of giving up any conquered territory, declaring, "[w]e have conquered, actually restored only the Serb territory that they took away from us back in 1941 when they conducted a

⁶⁶ P6134,p.2.

⁶⁷ P5623,p.4.

⁶⁸ H.OKUN:P776,p.79.

⁶⁹ V.ŽEPINIĆ:T.33594-33595.

⁷⁰ M.BULATOVIĆ:T.34543-34544; P6161,pp.1-2.

⁷¹ [REDACTED]

⁷² P797.

⁷³ P6444,p.2.

⁷⁴ P6444,p.2. See also P.TREANOR:P2538,para.134.

⁷⁵ H.OKUN:P776,p.227.

⁷⁶ H.OKUN:T.1490; H.OKUN:P776,pp.32-33.

massacre over the Serb people".⁷⁷

38. Similarly, **KARADŽIĆ** asserted that Serbs were entitled to approximately 65% of the land because they "own[ed]" it,⁷⁸ a rationale ridiculed even by Slobodan MILOŠEVIĆ: "as if someone would believe it—it's known that it was /all/ socially-owned property; the meadows, grazing land, and mountains were nobody's property! What owners, for goodness sake? [...] How can you imagine two thirds of the population being crammed into 30% of the territory, while 50% is too little for you?! Is it humane, is it fair?!"⁷⁹

39. Beyond such specious demographic justifications, the BSL also sought territory considered valuable,⁸⁰ such as Vogošća, a predominantly Muslim municipality⁸¹ that the BSL determined to take because of its industry.⁸²

40. Similarly, in 1995, **KARADŽIĆ** explained that the Serbs had "grabbed" many municipalities in which Muslims had been a majority for strategic reasons:

To tell the truth, there are towns that we've grabbed for ourselves, and there were only 30% of us. I can name as many of those as you want, but we cannot give up the towns where we made up 70%. Don't let this get around, but remember how many of us there were in Bratunac, how many in Srebrenica, how many in Višegrad, how many in Rogatica, how many in Vlasenica, in Zvornik, etc. Due to strategic importance they had to become ours, and no one is practically questioning it any more.⁸³

3. Population movement was essential to achieve the common purpose

41. The scope of the BSL's territorial claims meant that, without demographic change, an unacceptable number of Muslims and Croats would reside in territory intended for Serbs. The BSL initially contemplated achieving their desired demographic changes through population transfers.

42. In January 1992, KOLJEVIĆ met with Croatian president TUĐMAN to

⁷⁷ P921,p.32.

⁷⁸ P809,p.6.

⁷⁹ P2604,pp.6,9.

⁸⁰ P2585,p.5.

⁸¹ KDZ020:P2345,para.6; S.STANIĆ:T.31678-31679; M.TRIFUNOVIĆ:D2444,para.3.

⁸² P5511,p.3. *See also* P2586,p.1.

⁸³ P988,pp.68-69. *See also* P1379,pp.105-106.

discuss concerns about an independent BiH.⁸⁴ KOLJEVIĆ explained the BSL plan for separate and sovereign Serbian, Croatian and Muslim Bosnias,⁸⁵ acknowledging that the objective would be "homogeneity of certain areas."⁸⁶ TUĐMAN and KOLJEVIĆ agreed that the "transfer" of populations or "population exchanges" would "be the way" to address these national problems.⁸⁷

43. A month later, **KARADŽIĆ** and KRAJIŠNIK attended a regional SDS meeting resulting in a proposal for a population exchange.⁸⁸ **KARADŽIĆ** stressed to his followers that Muslims could not live with others and that population transfer was the solution, *e.g.*, "the conflict in Bosnia and Herzegovina is basically a conflict among peoples. Just as it was the case between India and Pakistan, and that's nothing new, it resulted in a huge resettlement of the people."⁸⁹

44. The perceived need to remove non-Serbs from Serb-claimed areas and maintain a revised ethnic structure persisted after much of the forced displacement had taken place. In January 1993, at a meeting with Slobodan MILOŠEVIĆ and other leaders from Serbia and RS, Serbian Foreign Minister JOVANOVIĆ expressed concern that international insistence on "freedom of movement" as part of a negotiated settlement raised the "justified fear of spoiled demographic structure" because it might permit Muslims to move into Serb areas.⁹⁰

45. JOVANOVIĆ proposed at a subsequent Assembly that the "strategic goal" of making the territories "nationally homogenous as soon as possible" be advanced by "exchange of inhabitants".⁹¹ He remained concerned that, if freedom of movement brought about a mixing of the population, then "what has been gained would gradually erode, and we would basically lose everything in the future."⁹² **KARADŽIĆ** assured him that homogeneity had largely been accomplished already, citing Zvornik in particular: "There was fifty-fifty of us in Zvornik. The number of

⁸⁴ P986,p.6.

⁸⁵ P986,p.9.

⁸⁶ P986,p.13.

⁸⁷ P986,pp.25,32-33. *See also* P790,p.17.

⁸⁸ P3474.

⁸⁹ P938,p.36; P12,pp.18-20.

⁹⁰ P6164,p.29.

⁹¹ P794,p.3.

⁹² P794,p.3.

inhabitants [...] is now the same, approximately 50,000, and they are all Serbs."⁹³ KOLJEVIĆ noted that "we will have to develop the activity of settlement homogenisation while there's still time."⁹⁴

4. Crimes were an essential part of the achievement of the common purpose

46. Whether or not the BSL could have furthered their demographic goals through population exchanges, it was clear that force would be necessary in light of the scope of the BSL's territorial and demographic ambitions, for example, transforming the predominantly-Muslim Drina Valley into "clean" Serbian territory.

47. This force was translated into the common criminal purpose to remove non-Serbs from Serb-claimed areas which encompassed the crimes charged in Counts 1 and 3-8 of the Indictment, namely: genocide;⁹⁵ crimes against humanity⁹⁶ of persecutions,⁹⁷ extermination,⁹⁸ murder,⁹⁹ deportation¹⁰⁰ and inhumane acts (forcible transfer);¹⁰¹ and the war crime¹⁰² of murder. Acts of persecution committed in pursuit of the common purpose included killings; cruel and inhumane treatment¹⁰³ (including torture,¹⁰⁴ beatings, physical and psychological abuse, rape¹⁰⁵ and other acts of sexual violence),¹⁰⁶ forcible transfer or deportation, unlawful detention,¹⁰⁷ forced labour,¹⁰⁸ plunder,¹⁰⁹ wanton destruction of private property¹¹⁰ (including homes, businesses and public property such as cultural monuments and sacred sites) and the imposition and maintenance of restrictive and discriminatory measures.¹¹¹ Alternatively, the crimes

⁹³ P794,p.4.

⁹⁴ P794,p.9. *See also* H.OKUN:P776,p.150.

⁹⁵ *See* III.E: Genocide.

⁹⁶ *Kunarac* AJ,paras.83,85.

⁹⁷ *Stakić* AJ,para.327; *Blaškić* AJ,para.131; *Krnjelac* AJ,paras.185,199,221; *Simić* AJ,para.177.

⁹⁸ *Stakić* AJ,paras.259-260; *Ntakirutimana* AJ,para.522.

⁹⁹ *Galić* TJ,para.150; *Popović* TJ,para.787. *See also* *Kvočka et al.* AJ,para.261; *Kordić* AJ,paras.36,37; *Čelebići* AJ,para.422.

¹⁰⁰ *Krajišnik* AJ,para.304; *Stakić* AJ,paras.278,300.

¹⁰¹ *Stakić* AJ,para.317; *Krnjelac* AJ,para.218.

¹⁰² *Stakić* AJ,para.342; *Kunarac* AJ,para.55; *Tadić* Jurisdiction Decision,paras.67-70,94; *Boškoski* AJ,para.66.

¹⁰³ *Kordić* AJ,para.39; *Blaškić* AJ,para.595; *Čelebići* AJ,para.424; *Popović* TJ,para.974; *Strugar* TJ,para.261.

¹⁰⁴ *Kunarac* AJ,para.142; *Krnjelac* TJ,para.179.

¹⁰⁵ *Kunarac* TJ,para.460; *Kunarac* AJ,para.127.

¹⁰⁶ *Milutinović* TJ,Vol.1,para.201.

¹⁰⁷ *Krnjelac* TJ,para.115; *Simić et al.* TJ,paras.64-65; *Krajišnik* TJ,para.752.

¹⁰⁸ *Naletilić* TJ,paras.259-260.

¹⁰⁹ *Krajišnik* TJ,paras.766-768,771.

¹¹⁰ *Kordić* AJ,para.74; *Popović* TJ,para.984; *Blagojević* TJ,para.593. *See also* *Blaškić* AJ,para.145.

¹¹¹ *Krajišnik* TJ,para.740.

of deportation and inhumane acts (forcible transfer) were part of the common purpose and the other pleaded crimes were foreseeable consequences of its execution.

48. **KARADŽIĆ** acknowledged that purpose, knew of the crimes as they were happening, praised the resulting demographic transformation, gave commands or guidance to pursue the common purpose, and assured his officials that the demographic transformation would not be reversed.

(a) The common purpose could only be achieved by force

49. The BSL's ambitious demographic objectives required forcible removal of very large numbers of Bosnian Muslims.¹¹² The populations were "thoroughly intermixed" and the BSL position was that "they had to be taken apart; and that of course is what ethnic cleansing was designed to do."¹¹³ Before the war, ŽEPINIĆ warned PLAVŠIĆ that "if you tried to separate the ethnic communities, then there would be violence and thousands of innocent civilians would be killed."¹¹⁴

50. **KARADŽIĆ** was determined to respond to BiH independence with force. In 1990, he warned that any effort to create an independent BiH would mean war because Serbs were powerful and united.¹¹⁵ By October 1991, as the BiH leadership moved toward independence, the BSL adopted a two-track strategy: conduct negotiations toward a resolution satisfactory to the BSL while preparing for a *de facto* and forcibly-imposed solution.¹¹⁶ **KARADŽIĆ** made clear to international negotiators that if the Bosnian Serbs did not get what they wanted, they would take it through war.¹¹⁷ **KARADŽIĆ** and KRAJIŠNIK reminded Serb officials that at any point they could "break off the talks and go for what we have done over the centuries: win our own territories by force."¹¹⁸

51. **KARADŽIĆ** and the other members of the JCE intended the forcible displacement of non-Serbs as part of the latter solution. **KARADŽIĆ** repeatedly invoked events in Croatia—where Serb Forces forcibly displaced non-Serbs in pursuit

¹¹² D.HARLAND:P820,para.270; H.OKUN:P776,pp.211-212; H.OKUN:P776,p.272.

¹¹³ H.OKUN:P776,p.64.

¹¹⁴ V.ŽEPINIĆ:T.33589-33590.

¹¹⁵ P2539,p.3. *See also* P958,p.6; P5790,p.3.

¹¹⁶ *See* III.C.1: Preparations to create a Serb-dominated state within Bosnia.

¹¹⁷ H.OKUN:P776,pp.43-44.

¹¹⁸ D88,p.21. *See also* p.64; P938,pp.44-45.

of the objectives of a JCE in which **KARADŽIĆ** participated.¹¹⁹ He regarded the RSK as the entity "from which the idea and national ideology of the Serbian Democratic Party derived", serving as example and inspiration.¹²⁰ The BSL's steps to ensure control over territories broadly mirrored the steps taken by the Croatian Serbs,¹²¹ involving the same "horrible game"¹²² as in Croatia, with the forcible displacement of non-Serbs from Serb-claimed territories.¹²³

52. **KARADŽIĆ** referred to the "same highway of hell and suffering" experienced in Croatia when he warned the Bosnian parliament that an independence initiative would result in the "possible extinction" of the Muslim people.¹²⁴ He explained to the RS Assembly in December 1991 that Croatia "tells us exactly" what a war in BiH would mean: "Apart from causing the deaths of several hundred thousand people and complete destruction of several hundred towns, a civil war in Bosnia and Herzegovina would also result in massive and rapid population movements; in other words, it would lead to population homogenisation."¹²⁵ As **KARADŽIĆ** made clear in intercepted conversations during that time, this meant the deaths of Muslims and Croats and destruction of their towns. The Serb response to independence would mean Muslims would "be up to their necks in blood" and "would disappear".¹²⁶

53. In early 1992, **KARADŽIĆ** told KRAJIŠNIK that IZETBEGOVIĆ was now "talking openly of a sovereign and independent Bosnia [...] fuck him. We will release our tigers and let them do their job."¹²⁷

(b) **KARADŽIĆ's** response to the crimes evidences the common criminal purpose

54. **KARADŽIĆ** and the BSL were informed repeatedly of crimes as they were taking place. Their responses—to deny, deflect, justify, and even ratify the crimes, confirm the common criminal purpose.

¹¹⁹ H.OKUN:P776,pp.12-13,48; M.MARTIĆ:T.38091-38093; D279,pp.12,14.

¹²⁰ P5492,p.10.

¹²¹ P.TREANOR:T.14036.

¹²² H.OKUN:P776,p.48.

¹²³ H.OKUN:P776,pp.12-13.

¹²⁴ D267,p.3.

¹²⁵ D86,p.40. *See also* P1353,p.4.

¹²⁶ D279,p.8. *See also* P2540,p.6; D377,p.2.

¹²⁷ P5779,p.5.

55. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

56. Internationals "repeatedly"¹³⁰ informed the BSL of widespread, ongoing ethnic cleansing. The level of media reporting and international scrutiny caused **KARADŽIĆ** to complain that journalists and international negotiators were hounding him with accusations of crime.¹³¹ The BSL "didn't deny" such allegations. Their typical response was to point out that genocide had been committed against the Serbs in WWII or to assert that crimes were now being committed against them.¹³²

In fact, in all of the conversations about ethnic cleansing with the Bosnian Serb leadership, it was highly unusual, almost never the case, that they denied it. [...] the almost invariable response was, "Look what they're doing to our people," or from Dr. Karadžić, "Sarajevo is a concentration camp where our people are being held prisoner, hostage."¹³³

57. The manner in which subordinates discussed crimes against non-Serbs—ranging from pride to matter-of-fact reporting—also confirms the existence of the common criminal purpose.

58. On 30 June 1992, **KARADŽIĆ** and **MLADIĆ** met in Zvornik with military and civilian authorities from Zvornik, Vlasenica, Srebrenica, Bratunac and other local areas.¹³⁴ Zvornik TO Commander **PAVLOVIĆ** bragged to **KARADŽIĆ**: "We were most active in evicting the Muslims". CS President **GRUJIĆ** reported: "We have successfully implemented the President's decision to settle Divič and Kozluk with our children."¹³⁵

¹²⁸ [REDACTED]

¹²⁹ [REDACTED]

¹³⁰ H.OKUN:P776,p.50.

¹³¹ See P939,p.4:P1417,p.61. See also P1105,p.112.

¹³² H.OKUN:P776,p.226. See also H.OKUN:P776,p.50 and specific examples at P790,p.37; H.OKUN:P776,pp.111-112; H.OKUN:T.1508-1509; P809,p.2. See III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.

¹³³ H.OKUN:T.1505-1506.

¹³⁴ P1478,p.246.

¹³⁵ P1478,pp.249-250,253-254. **PAVLOVIĆ** further described the policy being implemented in a public interview on the same date: "it would be best for the populations to be moved into enclaves, for the

59. A similar note of pride was struck at a 6 June 1992 meeting at which a Bratunac municipal leader reported to **KARADŽIĆ**, MLADIĆ, KOLJEVIĆ and OSTOJIĆ that: "There are no Muslims now in Bratunac municipality—it is a fully liberated town".¹³⁶

60. At a July 1992 Assembly session, Iliđža CS President PRSTOJEVIĆ gave **KARADŽIĆ** credit for Iliđža's achievements, noting that "when he visited us in Iliđža and encouraged us, the Serbs from Sarajevo retained control over the territory, and even extended their territory in some areas, driving the Muslims out of the territories where they had actually been a majority."¹³⁷

61. When RS Assembly deputy VJEŠTICA complained that a proposed peace agreement meant that Muslims would be coming back and "we will have to compensate everything we destroyed and burned and 17 mosques that we flattened", **KARADŽIĆ** reassured him that this was not true and "we will have barbed wire" at the borders for a long time.¹³⁸

62. Another Assembly official complained that a proposed citizenship law could be understood to mean that "all the Muslims and Croats we expelled" would be citizens of RS.¹³⁹ The bill was sent back to the Ministry for revision.¹⁴⁰

63. These reports reflect the BSL's insistence on physical separation and the need for "clean" or "pure" territories.¹⁴¹ It is therefore unsurprising that **KARADŽIĆ** and the BSL did not act upon the information about crimes brought to their attention. Neither the military or police officials commanding cleansing operations or camps nor the political officials who oversaw the mechanics of persecution and expulsion were punished.¹⁴² As **KARADŽIĆ** explained, "[w]e did not discipline our army using any drastic disciplinary measures or punishment because each of our soldiers disciplined

properties to be exchanged, and for these enclaves to be nationally homogenised, so that at least temporarily there [are] as few nationally mixed places". P2886.

¹³⁶ P1478,p.101.

¹³⁷ D92,p.66.

¹³⁸ P1379,pp.25-26.

¹³⁹ P1105,p.78.

¹⁴⁰ P1105,p.79.

¹⁴¹ See III.B.1: The goal of ethnic cleansing.

¹⁴² See III.D.2: **KARADŽIĆ** failed to prevent common purpose crimes or punish the perpetrators.

themselves with their own, state-building enthusiasm."¹⁴³ Moreover, **KARADŽIĆ** often promoted those responsible for crimes, or honoured them for their work.¹⁴⁴

64. By deflecting, denying or ignoring reports of crimes, **KARADŽIĆ** not only revealed his support for the crimes, but encouraged the continued implementation of the common purpose. As former RS Prime Minister Branko ĐERIĆ said to **KARADŽIĆ** in court, "[h]ad you punished what was supposed to be punished from day one, later on, things would not have happened. Worse things."¹⁴⁵

65. The level of international awareness was such that, as **KARADŽIĆ** later recounted, one of his war commissioners expressed concern that "we are skinning the cat alive before the whole world".¹⁴⁶ **KARADŽIĆ**'s response was to reassure local officials that the policy had not been changed: "It's not over. A lot can be accomplished [...]".¹⁴⁷ **KARADŽIĆ** would ensure that Bosnian Serb Forces continued expanding their territory by "packing Muslims in small areas, thus achieving their concentration"¹⁴⁸ through the crimes charged in the Indictment.

66. **KARADŽIĆ** and the BSL praised the results of the implementation of the common purpose.¹⁴⁹ Two years after Foča—renamed "Srbinje"—had been transformed from a predominantly-Muslim municipality into one with "only one people" living there and "only one religion practised there",¹⁵⁰ **KARADŽIĆ** expressed his satisfaction with the results and his assurance that it would not be allowed to change: "[t]wo years ago, we were a group in [BiH] that had some rights, and now we are the state and what we hold is 100% ours. Look at Srbinje,¹⁵¹ their plans for Srbinje were to build a big Islamic centre there. [...] Foča is extremely important to them, but it will never be theirs again."¹⁵²

67. Conversely, **KARADŽIĆ** and the BSL criticised failures and pushed laggards

¹⁴³ P953,p.8. *See also* P5525,p.10.

¹⁴⁴ *See* III.D.2.(c): **KARADŽIĆ** rewarded perpetrators of crimes against non-Serbs.

¹⁴⁵ B.ĐERIĆ:T.27999.

¹⁴⁶ P988,pp.65-66.

¹⁴⁷ P988,p.66.

¹⁴⁸ P988,p.64.

¹⁴⁹ P5167,p.2.

¹⁵⁰ P1367,p.25. *See also* P1371,p.78.

¹⁵¹ The new name given to Foča.

¹⁵² P1385,p.110. *See also* P6204.

to do better. **KARADŽIĆ** blamed Banja Luka official Predrag RADIĆ for not having expelled non-Serbs, leaving too many non-Serbs remaining in Banja Luka.¹⁵³ RADIĆ was also criticised "from the highest authority" for allowing mosques to stand until they were destroyed in 1993.¹⁵⁴ **KARADŽIĆ** and KRAJIŠNIK used their emissaries to provide this criticism: Velibor OSTOJIĆ, the RS Information Minister who was both close to **KARADŽIĆ** and an extremist,¹⁵⁵ was "especially persistent."¹⁵⁶

68. The Program for the Accommodation of Refugees¹⁵⁷ aimed to ensure the "ethnic-geographical continuity of Serb population"¹⁵⁸ by settling Serbs in areas from which non-Serbs had been expelled¹⁵⁹ so they wouldn't return.¹⁶⁰ Only Serb refugees would be accommodated. As co-chairman of the Program BRĐANIN¹⁶¹ stated, the "greatest wonder of the world" would be "that BRĐANIN could participate in a process of return of Croats and Muslims".¹⁶² **KARADŽIĆ** emphasised, "we have preserved 250.000 places of the living space where Muslims used to live",¹⁶³ underscoring one component of the factual situation he sought to have recognised in a peace deal.

(c) **KARADŽIĆ's** orders, directions and guidance evidence the common criminal purpose

69. Although the BSL generally eschewed explicit references to forcible expulsions in favour of indirect or ambiguous formulations such as "liberation or "čišćenje", two of the most significant VRS directives in fact explicitly reflect the common purpose. "My Order No.7"¹⁶⁴ (as **KARADŽIĆ** called it) directed the VRS to "create an unbearable situation of total insecurity with no hope of further survival or life for the inhabitants of Srebrenica and Žepa",¹⁶⁵ an illegal order reflecting the common purpose. Defence attempts to address Directive 7 were contradictory and

¹⁵³ P.RADIĆ:P1,pp.130-131,234.

¹⁵⁴ P.RADIĆ:P1,pp.107-108,111.

¹⁵⁵ B.DERIĆ:P4982,paras.10-12.

¹⁵⁶ P.RADIĆ:P1,p.111.

¹⁵⁷ D3588,p.4.

¹⁵⁸ P1379,p.212.

¹⁵⁹ P1388,p.168.

¹⁶⁰ P1419,pp.94-95.

¹⁶¹ D3588,p.4.

¹⁶² P1392,p.50.

¹⁶³ P1379,p.80.

¹⁶⁴ P4515,p.12; R.ĐURĐEVIĆ:T.25907,25938-25939.

increasingly preposterous.¹⁶⁶ Directive 4 directed the Drina Corps ("DK") to "inflict the heaviest possible losses on [the enemy]" and force them to leave "with the Muslim population".¹⁶⁷ KRAJIŠNIK admitted this was "[a]bsolutely" an "order for ethnic cleansing".¹⁶⁸ The directive followed **KARADŽIĆ** and KRAJIŠNIK's instruction to MLADIĆ that the most important objective was the one assigned to newly-appointed DK commander Milenko ŽIVANOVIĆ¹⁶⁹—"the [čišćenje—cleansing/mopping up] of the Drina. The most important task is separation from the Muslims".¹⁷⁰

70. The common purpose is also reflected in BSL directions to the military concerning Orašje, a predominantly-Croat area in Northern Bosnia. At a 31 May 1992 meeting with MLADIĆ and others,¹⁷¹ **KARADŽIĆ** stated that, if there was response to mobilization in the 1KK, "then we clear the Posavina of Croats."¹⁷² By November 1992, however, Orašje remained in Croat hands. On 8 November, KRAJIŠNIK told MLADIĆ that the "most pressing thing is to [očistiti—cleanse/mop-up]¹⁷³ Orašje".¹⁷⁴ Directive 4 followed, noting that Orašje had not been "liberated" and ordering the East Bosnia Corps ("IBK") to "liberate Orašje".¹⁷⁵ KRAJIŠNIK conceded the incriminatory implications of the order in his testimony in his own case.¹⁷⁶ The common purpose is expressed in other orders such as **KARADŽIĆ**'s instructions to MLADIĆ on 5 June 1992 discussed below.¹⁷⁷

71. These instructions and their implementation reflect the joint commitment of, among others, **KARADŽIĆ** and MLADIĆ to ensuring that their territory would be free of perceived and potential enemies. In May 1992, **KARADŽIĆ** told MLADIĆ:

¹⁶⁵ P838,p.10.

¹⁶⁶ See e.g. G.MILINČIĆ:D3682,paras.21-22; G.MILINČIĆ:T.39754-39755,39758.

¹⁶⁷ P976,p.5.

¹⁶⁸ M.KRAJIŠNIK:T.43823-43824.

¹⁶⁹ M.ŽIVANOVIĆ:T.42585.

¹⁷⁰ P1481,p.147. See further III.C.8.(i).(iii).b.iv: Directive 4; Podrinje Summary.

¹⁷¹ P1478,pp.38-42.

¹⁷² P1478,pp.40-41.

¹⁷³ The verb *čistiti* (meaning to clean) and its derivations (*čišćenje*, *čistiće se*, *očišćen*, etc.) may, depending on the context, be references to mopping up of the terrain, a military term for the final stages of an operation, or ethnic cleansing, the forcible removal of the population. D.HANSON:T.14573. While English translations generally use either "mop up" or "cleanse", the Prosecution above and elsewhere notes both English terms to assist the Trial Chamber to make a determination as to which sense is meant in the context of a particular document.

¹⁷⁴ P1481,p.147.

¹⁷⁵ P976,pp.3,5.

¹⁷⁶ M.KRAJIŠNIK:T.43840-43842. See also P797.

"We are on the threshold of achieving our centuries-old dream of creating our own state without many internal enemies."¹⁷⁸ MLADIĆ implemented that goal, which, after much of the cleansing had been achieved, he acknowledged: "this is our historical chance to create a state. Not any kind of state, but an all-Serbian state of a round shape with access to the sea [...] and as little enemies as possible, those who could be our potential enemies, and raise against us again in a few years /sic/."¹⁷⁹

(d) KARADŽIĆ's exploitation of the results of the cleansing campaign evidences the common criminal purpose

72. After repeatedly explaining the logic of the common purpose, ensuring its implementation, and praising its results, the BSL and **KARADŽIĆ** took steps to preserve and exploit the territorial and demographic changes created by the cleansing campaign. In negotiations, the BSL demanded territory based on the revised demographics of BiH resulting from the cleansing. In **KARADŽIĆ's** words: "we know our goal—to create new reality. And we have created that new reality, but we have to maintain it now and you will see that the world will recognise it under the slogan, 'it was born, so we have to swing it.'"¹⁸⁰

73. Even before the conflict began, **KARADŽIĆ** predicted that the factual situation would ultimately dictate the fate of the BSL's objectives. He told a gathering of Serbian leaders in December 1991, "we have to be wise enough and prepare both legality and the factual status" because Europe may or may not accept "legality".¹⁸¹ When he told Gojko ĐOGO on 12 October 1991 about the destruction that awaited Muslims should they move toward independence, he stated, "Europe will be told to go fuck itself, not to come back until the job is finished."¹⁸² On the day that the first Serb parallel institution—the Assembly—was formally established, he told MILOŠEVIĆ, "we have prepared everything to create a *de facto* situation that cannot be cha..., which they will break their teeth on".¹⁸³ After the cleansings began, **KARADŽIĆ**

¹⁷⁷ See III.C.8.(i).(iii).b.i: Directive 1.

¹⁷⁸ P1477,p.258.

¹⁷⁹ P1385,p.47.

¹⁸⁰ P1403,p.155.

¹⁸¹ P2554,p.78.

¹⁸² D279,p.9.

¹⁸³ P2546,p.1.

repeatedly reminded his followers and subordinates that "the factual situation will be decisive".¹⁸⁴ He told MLADIĆ on 2 August 1992 that "the European Community will accept the factual state of affairs, and that is why we should not make a single concession in military terms".¹⁸⁵ As MLADIĆ later stated, the operations were intended to "ensure as favourable conditions as possible for the state and political leaderships to conduct peace negotiations and to achieve the strategic aims of the war".¹⁸⁶

74. Internationals were well-aware that **KARADŽIĆ** was exploiting the results of the cleansing by negotiating based on demographic conditions produced by ethnic cleansing.¹⁸⁷ "Their whole claim, for example, for the Drina River valley, that is to say for the left bank of the Drina, was based on ethnic cleansing. I mean, they knew it; we knew it."¹⁸⁸

75. Similarly, on 18 September 1992, KOLJEVIĆ (with **KARADŽIĆ** present) stated that Serbs accepted changes in internal borders "to accommodate ethnic realities".¹⁸⁹ This was a "very clear, not-so-subtle" reference to ethnic cleansing.¹⁹⁰ The next day, **KARADŽIĆ** told negotiators in Geneva that, "[w]e do not need war. We should stop and stay where they and we are".¹⁹¹ The negotiators recognised this as an effort to impose a peace settlement based on the current situation.¹⁹²

76. Similarly, **KARADŽIĆ**'s effort to conduct referendums in Serb-claimed and cleansed areas aimed at cementing the revised demographic situation. On 15 January 1993, BUHA suggested (per **KARADŽIĆ**) to "identify controversial areas and solve on basis of referendum".¹⁹³ Internationals recognised the ploy—"holding a referendum in areas that you've ethnically cleansed looks like a pretty good deal to the ethnic cleanser."¹⁹⁴ **KARADŽIĆ** had made a similar suggestion a week earlier,

¹⁸⁴ D456,p.55.

¹⁸⁵ P1479,p.22.

¹⁸⁶ P970,pp.21-22.

¹⁸⁷ H.OKUN:P776,p.51.

¹⁸⁸ H.OKUN:P776,p.51.

¹⁸⁹ P785,p.34.

¹⁹⁰ H.OKUN:P776,pp.74-75.

¹⁹¹ P785,p.44.

¹⁹² H.OKUN:P776,pp.77-78.

¹⁹³ P789,p.58. *See also* H.OKUN:P776,p.104.

¹⁹⁴ H.OKUN:P776,p.104; H.OKUN:T.1522-1524.

taking the position that "[i]f 'people' could decide democratically, we'd accept".¹⁹⁵ OWEN dismissed the proposal because "[t]oo much of the population [had] been displaced".¹⁹⁶

77. **KARADŽIĆ** assured his officials that he intended to maintain the situation that his forces had created:

We have created new realities. Speaking in narrow terms, Zvornik used to be 60:40 to the advantage of Muslims, but the Serbs from Zenica came, they occupied Kozluk, the Muslims left for Europe and I do not know where else. And then those gentlemen told us – who gives you a right to ask for Zvornik [...] We request Zvornik based on the right which comes out of a new reality. [...] This war has created the new reality, there are now the Serbs from Zenica here. If you want to give Zvornik to the Muslims then you have to wage a new war in order to expel these Serbs back to Zenica. We request Zvornik according to this right.¹⁹⁷

78. What **KARADŽIĆ** omitted when he asserted this "right" to Zvornik and similar areas based on the Serbs' occupation of Kozluk (previously the home of Muslims who "left for Europe and I do not know where else"), was that this resulted from his plan "to settle Divič and Kozluk with our children."¹⁹⁸

79. The BSL and **KARADŽIĆ** sought to keep as much territory as possible and ensure that it would not be permeable to Muslims, who might exploit weak borders to populate Serbian territories.¹⁹⁹ Thus, **KARADŽIĆ** insisted on maintaining "thicker" borders with Muslims and Croats in contrast to borders with Serbia or the Serbian Krajina.²⁰⁰

80. The Defence pointed to stated "undertakings" by the BSL that all persons could return to their homes as evidence undermining the common purpose.²⁰¹ [REDACTED]

¹⁹⁵ P790,p.40.

¹⁹⁶ H.OKUN:T.1519.

¹⁹⁷ P1403,p.157. *See also* P1367,pp.109-110.

¹⁹⁸ P1478,pp.249-250.

¹⁹⁹ P1390,p.41.

²⁰⁰ D456,p.55.

²⁰¹ *See e.g.* D4720,p.1; D3060,p.7; V.LUKIĆ:D3563,para.21.

[REDACTED]²⁰² Moreover, in 1995, **KARADŽIĆ** made clear to the Assembly how he would work to undermine any stated commitment on return of refugees. He was prepared to agree to the provision in the current peace proposal about return of refugees provided that it was "an overall process", explaining:

That means that the Muslims from Kozluk can return to Kozluk, if the Serbs from Kozluk return to Zenica. If they don't want to return, then we need, and if they cannot return, then we need a new war to exchange that, and that's why I think we should always insist on this.²⁰³

As **KARADŽIĆ** explained, "[w]e can act the Serbian, Cyrillic way and tell it all to their face, or we can be a bit cunning, we do have to be a bit cunning."²⁰⁴

81. **KARADŽIĆ** continued to deflect international condemnation while continuing to pursue his criminal objectives. In January 1993, **JOVANOVIĆ** advised **KARADŽIĆ** to "make the territory that we get, nationally homogeneous as soon as possible" wisely, and in a less visible way—that is, by making "life in that future Bosnia [...] impossible", and "encourag[ing] the migration of our people in the direction of our provinces, and others towards theirs".²⁰⁵ **KARADŽIĆ** responded enthusiastically to **JOVANOVIĆ**'s comments, while noting that this "has already happened to a huge extent".²⁰⁶

82. **KARADŽIĆ** took heed of **JOVANOVIĆ**'s "little warning" to avoid being "[caught] at anything that even resemble[d] ethnic cleansing or linking",²⁰⁷ and took advantage of opportunities for a less visible role in expulsions of non-Serbs. As discussed in detail below,²⁰⁸ **Vojislav ĐURKOVIĆ** (a.k.a. "VOJKAN")—a man notorious for expelling Bijeljina's Muslims—presented one such opportunity. Despite direct complaints to **KARADŽIĆ** regarding **VOJKAN**'s activities, and **KARADŽIĆ**'s assurances that his crimes would be investigated, no action was taken against him.

²⁰² **[REDACTED]**.

²⁰³ P988,p.29.

²⁰⁴ P988,p.29.

²⁰⁵ P794,pp.3-4.

²⁰⁶ P794,p.4.

²⁰⁷ P794,p.5.

²⁰⁸ See Brief, paras.531-533,546,556-558; Bijeljina Summary.

83. **KARADŽIĆ** made the reasons for this clear during a 1995 Supreme Command session with his generals and others such as **KRAJIŠNIK**. **KARADŽIĆ** noted that a Muslim presence in such places as Prijedor "is disastrous for us", claiming that Muslims would use even the fraction that remained—citing a figure for Muslims which was approximately 20% of the pre-war population—to demographically overwhelm the Serbs in a short time.²⁰⁹ **KARADŽIĆ** emphasized that it was a "standpoint of our policy" that there has been a separation of peoples, that "birds of a feather flock together".²¹⁰ He acknowledged that if **VOJKAN**'s actions "were being done by a state institution, we would be accused of ethnic cleansing".²¹¹ **KARADŽIĆ** advised, "turn[ing] a blind eye at a private agency which makes these private arrangements"—because "no one can accuse us"²¹² thereby expressing his view—as understood by **MILOVANOVIĆ**—that "it would be good to have as small as possible number of Muslims in Bosnia and Herzegovina".²¹³

5. JCE members

84. As the ultimate Bosnian Serb political and military authority, **KARADŽIĆ** led the main organs and forces that implemented the common criminal purpose.²¹⁴ He worked together with other Serb military and political leaders to achieve the objective of permanently removing non-Serbs from Bosnian Serb-claimed territory. While the JCE's membership fluctuated over time, each member made a significant contribution to achieving the common criminal purpose. The roles of significant JCE members aside from **KARADŽIĆ** are discussed below.

(a) Ratko MLADIĆ

85. Ratko **MLADIĆ** was commander of the VRS Main Staff ("VRS-GŠ") from its establishment on 12 May 1992.²¹⁵ He remained in this position throughout the conflict period.²¹⁶ During this time, **MLADIĆ** answered to the Supreme Commander

²⁰⁹ P3149,p.65.

²¹⁰ P3149,p.65.

²¹¹ P3149,p.65.

²¹² P3149,p.66.

²¹³ M.MILOVANOVIĆ:T.25543-25545.

²¹⁴ See III.C.8: Organs used by **KARADŽIĆ** and other JCE members to implement the common criminal purpose.

²¹⁵ P1355,p.2.

²¹⁶ P1489,p.135.

KARADŽIĆ who remained in ultimate control.²¹⁷ Prior to his appointment as VRS-GŠ Commander, as the JNA 9th Corps Commander based in Knin, MLADIĆ contributed to the efforts to create Serb-controlled areas of Croatia by commanding military operations involving the expulsion of Croats.²¹⁸ **KARADŽIĆ** considered MLADIĆ a "glorious fighter from Krajina,"²¹⁹ and selected MLADIĆ²²⁰ to head the VRS in implementing the goal of creating homogeneous, Serb-controlled areas of BiH by forcibly removing non-Serbs.²²¹

86. MLADIĆ accepted the assignment (warning at the outset that moving "[p]eople and peoples" from here to there was "something easily said but difficult to achieve"),²²² embraced the common purpose ("My concern is not that they will create the state. My concern is to have them vanish completely.")²²³ and implemented the BSL's policies and goals ("First, people and the Army, with the help from the rest of us according to our possibilities, have carried out the most of tasks, and strategic goals, set to them. We have created Republika Srpska.")²²⁴ From its establishment, the VRS played a central role in the implementation of the common criminal purpose, including the commission of systematic crimes against non-Serbs.²²⁵

(b) Momčilo KRAJIŠNIK

87. Momčilo KRAJIŠNIK was the President of the Assembly of the Serbian People of BiH ("Assembly") from its inception on 24 October 1991,²²⁶ a member of the National Security Council ("NSC") from 27 March 1992, and a member of the Expanded (War) Presidency from 2 June 1992.²²⁷ Prior to this, he was President of the (multi-ethnic) SRBiH Assembly from December 1990, and a member of the SDS Main Board—its main policy-making body—from July 1991.²²⁸ KRAJIŠNIK was

²¹⁷ See III.C.8.(l): VRS.

²¹⁸ M.BABIĆ:P742,pp.13-16; R.THEUNENS:P3033,p.172; P2601.

²¹⁹ P1379,p.316.

²²⁰ P970,p.317; P1477,p.292.

²²¹ P1477,pp.258,262; D325,p.159; III.C.8.(l): VRS.

²²² P956,p.33.

²²³ P1385,p.49.

²²⁴ P1379,p.66. See also P956,pp.9-10; P1477,p.262; D325,p.159; D825,p.13; D2149,p.27; D232; D593; D235; P976; P977; P3039; P838. See further III.C.8.(l): VRS.

²²⁵ See III.C.8.(j).(ii): The VRS implemented the common criminal purpose.

²²⁶ P.TREANOR:P2538,para.80; P1342,p.3; P1344,p.3; P1345,p.2.

²²⁷ B.DERIĆ:P4982,para.29; P.TREANOR:P2536,pp.5,9-10.

²²⁸ P.TREANOR:P2536,paras.14-15,18.

recognized by many, including MILOŠEVIĆ, as a key SDS policy-maker.²²⁹

88. Beyond those formidable positions, however, KRAJIŠNIK was **KARADŽIĆ**'s closest collaborator, second only to **KARADŽIĆ** in his influence among the Bosnian Serbs.²³⁰ The two were likeminded²³¹ and in constant communication.²³²

89. KRAJIŠNIK and **KARADŽIĆ** were the "Alpha and Omega" of the Bosnian Serb government,²³³ holding "the highest level of power".²³⁴ At a June 1994 Assembly session, deputy MILJANOVIĆ declared that as "the highest RS leaders", **KARADŽIĆ** and KRAJIŠNIK "could not sail the Serbian boat and the Serbian people in it in a more successful manner than they did", and praised them for "standing on the top of the Serbian liberation movement and war".²³⁵

90. **KARADŽIĆ** personally selected KRAJIŠNIK to be President of the Assembly, the top SDS decision-making body.²³⁶ The BSL used the Assembly to disseminate instructions to and receive information from SDS leaders at the municipal level.²³⁷

91. Like **KARADŽIĆ**, KRAJIŠNIK advocated the need for "pure" or "clean" Serb territories,²³⁸ and for *de facto* solutions²³⁹ through "conquer[ing]" territory.²⁴⁰ Along with **KARADŽIĆ**, KRAJIŠNIK monitored the military implementation of the six strategic goals to ensure that they were fulfilled.²⁴¹ In September 1994, MILOŠEVIĆ characterised KRAJIŠNIK's view as preferring to kill all Muslims and Croats.²⁴²

²²⁹ P.TREANOR:P2536,para.14.

²³⁰ P.TREANOR:P2536,para.15; R.NEŠKOVIĆ:P2568,p.19.

²³¹ P5785,p.4. *See also* B.ĐERIĆ:P4982,paras.30-31; R.NEŠKOVIĆ:P2568,pp.177-178.

²³² P.TREANOR:P2536,para.15.

²³³ B.ĐERIĆ:T.27952.

²³⁴ R.NEŠKOVIĆ:P2568,p.21; P1387,p.46.

²³⁵ P1387,p.46.

²³⁶ R.NEŠKOVIĆ:P2568,pp.14,19-21,176.

²³⁷ *See* III.C.8.(f): Assembly.

²³⁸ P5623,p.4; P1377,p.49; P1379,p.48; AF2411; R.DONIA:P972,paras.20,67,73. *See also*

P.TREANOR:P2538,paras.142,196,219,229,233,258; P3200,p.2.

²³⁹ D90,pp.13,37-39.

²⁴⁰ P1478,p.109.

²⁴¹ *See e.g.* P1477,pp.262-263; P1478,pp.108-109; P1479,pp.140-144; P1481,pp.146-147. *See* III.C.8.(i).(iii).a: **KARADŽIĆ**'s strategic direction to the VRS.

²⁴² P1487,p.16.

(c) Miće STANIŠIĆ

92. Miće STANIŠIĆ was a founding member of the SDS²⁴³ and a member of both the Council of Ministers²⁴⁴ and the NSC.²⁴⁵ He was the RS's first Interior Minister, from 24 March 1992²⁴⁶ until the end of December 1992,²⁴⁷ resuming the post for six months in 1994.²⁴⁸ STANIŠIĆ was one of the RS's most powerful ministers, and reported to and took orders from **KARADŽIĆ**.²⁴⁹

93. STANIŠIĆ played a leading part in the creation of an ethnically separate RSMUP²⁵⁰ critical to establishing and maintaining Bosnian Serb authority over claimed territories and to implementing the common criminal purpose.²⁵¹ His MUP forces coordinated action with other armed forces to execute the common purpose. Following the take-overs, these MUP forces took a lead role in disarming, arresting, rounding up, detaining, beating, killing, and expelling Muslims and Croats.²⁵²

94. STANIŠIĆ contributed to "liberat[ing] and creat[ing] the space"²⁵³ in Sarajevo and elsewhere during the first six weeks of the conflict by overseeing RSMUP participation in takeover and cleansing operations, and in the operation of camps in which non-Serbs were held and then ultimately 'exchanged'. STANIŠIĆ acknowledged implementing **KARADŽIĆ**'s orders²⁵⁴ and assured the Assembly in November 1992, "I as a man have followed policies of the SDS Presidency and our Deputies in the former state, I have always followed these policies."²⁵⁵

²⁴³ P1383,p.57.

²⁴⁴ See e.g. P3111. See also M.STANIŠIĆ:T.46341; P.TREANOR:P2536,p.162.

²⁴⁵ See e.g. P3050.

²⁴⁶ P1354,p.7.

²⁴⁷ M.STANIŠIĆ:T.46327.

²⁴⁸ STANIŠIĆ also served as Minister of the Interior between January and July 1994.

M.STANIŠIĆ:T.46327.

²⁴⁹ M.MANDIĆ:C2,pp.249,266; P5646; B.ĐERIĆ:P4982,paras.13-14,21-23; P1105,p.12;

B.ĐERIĆ:T.27947-27949,27983.

²⁵⁰ See IIL.C.8.(h).(i): Creation of the RSMUP. P1083; Č.KLJAJIĆ:T.42192-42196;

M.MANDIĆ:C2,p.43; P1116; P1103,p.25.

²⁵¹ Minister of Internal Affairs STANIŠIĆ took credit on behalf of the police for "set[ting] up most of the borders as they are today." D4274,p.3. See also P2967,p.2.

²⁵² See Municipality Summaries; C.NIELSEN:P2958,paras.E19-E21,198,200,285-329; D447,p.7; P1097; M.MANDIĆ:C2,p.304. See also M.MANDIĆ:T.4573-4574.

²⁵³ P970,p.316.

²⁵⁴ M.STANIŠIĆ:T.46369-46370,46403.

²⁵⁵ P1105,p.15.

(d) Momčilo MANDIĆ

95. Momčilo MANDIĆ was Assistant Minister of the RSMUP (April-May 1992)²⁵⁶ and RS Minister of Justice (12 May-23 November 1992).²⁵⁷ MANDIĆ worked with **KARADŽIĆ**, M.STANIŠIĆ and other JCE members to divide the multi-ethnic MUP and arm the emerging RSMUP;²⁵⁸ directed MUP forces in Sarajevo during the initial period of ethnic division and taking of territory;²⁵⁹ and oversaw a prisoner-exchange regime intended for non-Serb civilians who had been rounded up, held in brutal detention facilities and ultimately transferred out of RS.²⁶⁰ One of the most powerful RS government ministers,²⁶¹ MANDIĆ reported to **KARADŽIĆ** directly.²⁶²

96. MANDIĆ contemporaneously expressed his support for the common purpose, telling an interlocutor in late May 1992 that if the Lisbon talks broke down, the Serbs would defeat Sarajevo and "expel [the Muslims] all the way to Visoko",²⁶³ a view that he confirmed reflected the attitude of the RS political leadership.²⁶⁴ He agreed to send "30 more Turks" imprisoned at Kula for "special tasks",²⁶⁵ meaning use as human shields or trench diggers.²⁶⁶ He oversaw the arrest of civilians, including "women Turks" whom he made available to a journalist for propaganda purposes.²⁶⁷ He bragged that the Serbs were "holding the Turks under siege" to "starve them a bit",²⁶⁸ that the Serbs would drive the Bosnian Muslims into a small area of Sarajevo "from the Eternal Flame to Vratnik"²⁶⁹ and that Serbs would create "a new and nice Sarajevo" without mosques.²⁷⁰

²⁵⁶ M.MANDIĆ:T.4427.

²⁵⁷ M.MANDIĆ:C2,p.5; M.MANDIĆ:T.4419-4420,4428,4535,4538,4542,4545.

²⁵⁸ See III.C.8.(h).(i): Creation of the RSMUP. P1083; Č.KLJAJIĆ:T.42192-42196; M.MANDIĆ:C2,p.43; P1116; P1103,p.25.

²⁵⁹ See e.g. P1124,p.3; P1103,pp.4-10; P1148.

²⁶⁰ See III.C.8.(c): Exchange Commission; P1087; P1129; P1101; M.MANDIĆ:C2,p.249. See also M.MANDIĆ:C2,p.204.

²⁶¹ M.MANDIĆ:C2,p.249; P5646.

²⁶² P4982,paras.15,21-23; P1105,p.12; B.DERIĆ:T.27947-27949,27983; P5646.

²⁶³ P1149,pp.8,13.

²⁶⁴ M.MANDIĆ:C2,pp.427-428.

²⁶⁵ P1143,pp.2-3.

²⁶⁶ See e.g. M.MANDIĆ:C2,pp.343-345.

²⁶⁷ P1152,p.3.

²⁶⁸ P1103,p.5.

²⁶⁹ P1103,p.5.

²⁷⁰ P1103,p.7.

(e) Biljana PLAVŠIĆ

97. Prior to the conflict, Biljana PLAVŠIĆ was one of two SDS representatives on the collective Presidency of BiH.²⁷¹ She and KOLJEVIĆ served as "acting Presidents" from 28 February 1992 until the Assembly on 12 May created the three-member RS Presidency, on which she served with **KARADŽIĆ** and KOLJEVIĆ.²⁷² She continued in this position when the Presidency was expanded to the five-person War Presidency on 2 June 1992.²⁷³ On 17 December 1992, when the War Presidency was replaced by **KARADŽIĆ** as President, PLAVŠIĆ and KOLJEVIĆ became Vice Presidents.²⁷⁴ During this entire period, even when a member of the Bosnian Presidency, PLAVŠIĆ consulted regularly with and deferred to **KARADŽIĆ**.²⁷⁵

98. PLAVŠIĆ shared the objective of removing non-Serbs from Serb territory,²⁷⁶ [REDACTED] She invited paramilitary units prone to criminality—including ARKAN's Tigers—to Bosnia, "to help the defence of the Serbian people in Republika Srpska".²⁷⁸ When PLAVŠIĆ visited Bijeljina following its brutal takeover by ARKAN and other Serb Forces, she kissed ARKAN and repeatedly praised him.²⁷⁹

(f) Nikola KOLJEVIĆ

99. Nikola KOLJEVIĆ had the same role as PLAVŠIĆ in the pre-war collective Presidency, three-member RS Presidency and War Presidency, following which he too became a Vice President.²⁸⁰

100. KOLJEVIĆ's views aligned with those of **KARADŽIĆ** and KRAJIŠNIK; they spoke with "one voice".²⁸¹ He was an extreme nationalist and advocated ethnically cleansing Muslims from Serb areas.²⁸² He met on 8 January 1992 with

²⁷¹ AF1898.

²⁷² P.TREANOR:P2536,pp.8-10,paras.180,236; P3032.

²⁷³ P.TREANOR:P2536,p.11,para.236.

²⁷⁴ P.TREANOR:P2536,paras.265-266.

²⁷⁵ P.TREANOR:P2536,paras.16-17; C.DOYLE:P918,p.11.

²⁷⁶ H.ABDEL-RAZEK:P1258,pp.7,11-12.

²⁷⁷ [REDACTED]; V.ŽEPINIĆ:T.33594-33595.

²⁷⁸ M.STANIŠIĆ:T.46385-46386; M.MANDIĆ:T.4625-4627; M.DAVIDOVIĆ:P2848,para.72; P1106.

See also D.ANDAN:D3774,pp.207-208.

²⁷⁹ AF2248.

²⁸⁰ *See citations in* Brief,para.97.

²⁸¹ R.ĐURĐEVIĆ:T.25908.

²⁸² V.ŽEPINIĆ:T.33594-33595; H.OKUN:P776,p.79.

TUĐMAN to discuss creating ethnically homogeneous territory through property and population transfers²⁸³ and continued to endorse ethnic homogenization into 1993.²⁸⁴ In May 1992, he refused to guarantee safety to Pale Muslims telling them: "It doesn't matter ... that you want to stay on living here, but the Serbs don't want to continue living with you here".²⁸⁵

(g) Slobodan MILOŠEVIĆ

101. Slobodan MILOŠEVIĆ was the President of Serbia²⁸⁶ and considered the overall leader of all Serbs in the Balkans throughout the conflict period.²⁸⁷ Milan BABIĆ called him "the president of all Serbs"²⁸⁸ and Jovica STANIŠIĆ referred to him as "the main boss".²⁸⁹ MILOŠEVIĆ, **KARADŽIĆ** and other members of the BSL, the Serbia/Yugoslavia and RSK leadership shared the vision of a joined state of all Serbs.²⁹⁰ MILOŠEVIĆ and **KARADŽIĆ** initially tried to maintain Yugoslavia, which yielded to establishing Serb-controlled areas in Croatia and BiH, with geographical links to Serbia/Yugoslavia,²⁹¹ and thus achieving the ultimate goal of all Serbs in one state.²⁹²

102. MILOŠEVIĆ and **KARADŽIĆ** were close collaborators.²⁹³ They had frequent contacts directly, or through other Serb officials, including Jovica STANIŠIĆ,²⁹⁴ discussing and coordinating plans for Serb activities in Croatia and BiH.²⁹⁵ Throughout the conflict both in Croatia and BiH, MILOŠEVIĆ and his associates within Serbia/Yugoslavia provided support for the Serb leaders in the

²⁸³ P986,pp.13-14,33; P.TREANOR:P2538,para.103.

²⁸⁴ P794,pp.5,8.

²⁸⁵ S.CRNCALO:P733,para.38; S.CRNCALO:T.1164-1165.

²⁸⁶ P3048.

²⁸⁷ Y.AKASHI:T.37705.

²⁸⁸ P754,p.10; M.BABIĆ:P743,p.31.

²⁸⁹ P5801,p.5; P5818. *See also* P3879,00:39.25-00:39:53.

²⁹⁰ M.BABIĆ:P742,pp.16-23; P743,pp.20-22; P6306; P6308.

²⁹¹ M.BABIĆ:P743,pp.34,36-37; P6484,p.2; D83,pp.33-34; P5867,p.2; P2546,pp.6-8; P5822,p.3; P938,p.37. III.C.1: Preparations to create a Serb-dominated state within Bosnia.

²⁹² D92,pp.69-71; D115,p.9; P883,p.3; P988,p.34; P953,p.5; P1424,p.4.

²⁹³ M.BABIĆ:P742,p.20.

²⁹⁴ *See* III.B.5.(h): Jovica STANIŠIĆ.

²⁹⁵ D1282; P5683; P5686; P5687; P5688; P5893; D3531; P5890; P5887; P5883; P5875; P5881; P5880; P5877; D365; D4545; P5866; P5867; P5864; P5865; P5863; P5861; P5853; P5859; D4496; D4497; P5848; P5847; P2546; P5834; P5832; P5828; P5822; P5897; P5815; P5813; P5811; P5809; P5808; P5795; P2544; P2224; P5790; P5787; P5780; P5775; P5769; P5767; P5766; P5752; P5751; P1484,pp.53-62; P1486,pp.216-229; P3863; P1489,pp.4,79.

targeted areas through the use of the JNA/VJ²⁹⁶ and the Serbian MUP.²⁹⁷ As VJ Chief of General Staff PERIŠIĆ explained in June 1994, the VRS and the SVK could not have waged the war without support from the VJ and FRY.²⁹⁸

(h) Jovica STANIŠIĆ

103. Jovica STANIŠIĆ headed the Republic of Serbia DB, part of the Serbian MUP.²⁹⁹ STANIŠIĆ and **KARADŽIĆ** discussed and coordinated Serb activities in Croatia and BiH,³⁰⁰ including the use of the JNA³⁰¹ and volunteers.³⁰² STANIŠIĆ also liaised between **KARADŽIĆ** and MILOŠEVIĆ.³⁰³ As STANIŠIĆ told the RSK MUP officials in 1994, the goal of the fight was to "achieve the common goals of all the Serbian lands".³⁰⁴

104. STANIŠIĆ and the Serbian MUP provided arms to Serbs in BiH,³⁰⁵ established training camps for Serb fighters,³⁰⁶ and facilitated the participation of Serbian DB units—including the special purposes unit, a.k.a. Red Berets, and the Serbian Volunteers Guard of Željko RAŽNATOVIĆ, a.k.a. ARKAN—in operations in BiH alongside Bosnian Serb Forces.³⁰⁷ STANIŠIĆ began liaising directly with **KARADŽIĆ** even before the war in Croatia and maintained direct contact and

²⁹⁶ R.THEUNENS:P3033,p.163; P5861,pp.5,7; III.C.8.(j): JNA/VJ.

²⁹⁷ M.BABIĆ:P741,p.122; P4263; M.MARTIĆ:T.38130-38131; [REDACTED]; III.C.8.(l): Paramilitaries/Volunteers/Serbian MUP.

²⁹⁸ P3048,p.5; R.THEUNENS:P3033,p.355.

²⁹⁹ M.MANDIĆ:C2,p.439; KDZ446:P29,p.134; [REDACTED].

³⁰⁰ P2223; P5614; P5801; P5872; P5788; P5772; P5773; P5771; P5768; D301; P5622.

³⁰¹ P5872; P5771.

³⁰² P5801.

³⁰³ P5772; P5773; P5872.

³⁰⁴ P6307. *See also* P5788.

³⁰⁵ [REDACTED]; P3153,pp.7,22-35; KDZ446:P29,pp.24-25; [REDACTED]; P1473,p.80. *See also* D4495; M.BABIĆ:P742,pp.7-8.

³⁰⁶ For instance, in November 1991, STANIŠIĆ told **KARADŽIĆ** that he hoped that he and his colleagues, "Frenki and Captain", will "have a chance to work" with **KARADŽIĆ**. *See* P5614. Around this period of time, Captain DRAGAN's instructors engaged in trainings of Serb soldiers in the area of Krajina and eastern BiH. *See* [REDACTED]; P4262; D.RISTANIĆ:P3023,paras.97-103; P2888,p.3; P4263,pp.3-4; P2855,p.5; P6317. *See also* M.BABIĆ:P741,pp.117-120; M.MARTIĆ:T.38149-38152; M.DAVIDOVIĆ:T.15513; P3384; P1478,p.270.

³⁰⁷ *See* III.C.8.(l): Paramilitaries/Volunteers/Serbian MUP. For instance, in 1992, the Serbian DB units participated in combat operations in BiH, "the corridor at Brčko, in the Drina, Sarajevo". *See* P4263,pp.3-4; M.BABIĆ:P741,pp.122-123. *See also* P6317; R.THEUNENS:P3033,pp.181-193; D1412,pp.6-8,10; P6174; P6175. *See also* Bijeljina, Zvornik, Brčko and Ilidža Summaries.

continued to support the BSL's efforts in BiH throughout the conflict period.³⁰⁸

(i) Franko SIMATOVIĆ, a.k.a. FRENKI

105. Franko SIMATOVIĆ, a.k.a. FRENKI, was a member of the Serbian DB under J.STANIŠIĆ.³⁰⁹ SIMATOVIĆ together with J.STANIŠIĆ collaborated with the BSL in establishing Serb control in BiH municipalities.³¹⁰ He oversaw training of Serb Forces.³¹¹ Serbian DB units under J.STANIŠIĆ and SIMATOVIĆ, including the Red Berets and ARKAN's men,³¹² participated in operations in BiH, "the corridor at Brčko, in the Drina, Sarajevo".³¹³

(j) Željko RAŽNATOVIĆ, a.k.a. ARKAN

106. Željko RAŽNATOVIĆ, a.k.a. ARKAN, was a known criminal and leader of a paramilitary unit widely known for criminality.³¹⁴ ARKAN's unit was stationed in Erdut, Croatia,³¹⁵ under Serbian DB control.³¹⁶ ARKAN's men were involved in municipal takeover operations, during which non-Serbs were attacked and expelled,³¹⁷ a significant part of the "strong support" that **KARADŽIĆ** acknowledged came from the Serbian DB.³¹⁸ ARKAN publicly acknowledged that his unit had arrived in BiH at the invitation of the SDS.³¹⁹ **KARADŽIĆ** continued to use ARKAN's unit in BiH as late as 1995.³²⁰

³⁰⁸ M.BABIĆ:P741,pp.97-98; P742,pp.28-30; P1484,pp.53-62; P1473,pp.209-215; P1489,pp.53,72-73,78-79; P3056,pp.2-3; P1484,pp.53-62; R.THEUNENS:P3033,pp.189-193. *See also* P6305; M.MARTIĆ:T.38095.

³⁰⁹ KDZ446:P29,p.134; [REDACTED]; M.BABIĆ:P741,p.117.

³¹⁰ M.BABIĆ:P741,pp.97-98; M.BABIĆ:P742,pp.28-30.

³¹¹ P4263,pp.3-4; M.BABIĆ:P741,pp.117-120,122-123; M.MARTIĆ:T.38149-38152; *See also* P5614; [REDACTED]; P4262;

D.RISTANIĆ:P3023,paras.97-103; M.DAVIDOVIĆ:T.15513; P3384; P1478,p.270. *See also* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

³¹² M.DAVIDOVIĆ:P2848,paras.80,112-113,166; D1412,pp.6-7,10; P2982; R.THEUNENS:P3033,pp.181-193; M.BABIĆ:P741,pp.122-123. *See also* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

³¹³ P4263,p.3; M.DAVIDOVIĆ:P2848,para.66; P1474,p.137; P6210. *See also* Bijeljina, Zvornik and Brčko Summaries.

³¹⁴ P5589; P2021; D1612,pp.5-6; R.THEUNENS:P3033,p.189; M.STANIŠIĆ:T.46385-46386. *See also* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

³¹⁵ D1612,p.14; M.DAVIDOVIĆ:P2848,para.125; P2021.

³¹⁶ R.THEUNENS:P3033,pp.185-191; M.DAVIDOVIĆ:P2848,paras.80,121,125; [REDACTED]; P4263,p.3; P6314,pp.3-4; P6315,pp.2-4; P1473,p.213; P1489,pp.53,72-73; [REDACTED].

³¹⁷ *See* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

³¹⁸ P1478,p.133.

³¹⁹ D1612,p.11. *See also* P6211,pp.3-5.

³²⁰ P3056. *See also* M.MILOVANOVIĆ:T.25455-25458; P1489,pp.53,72-73; P6210.

107. **KARADŽIĆ** and other members of the BSL welcomed³²¹ and awarded ARKAN and his men.³²²

(k) Vojislav ŠEŠELJ

108. Vojislav ŠEŠELJ was the leader of the Serbian Radical Party ("SRS").³²³ He was an outspoken advocate of the policy of creating a homogeneous Greater Serbia which would encompass large areas of Croatia and BiH.³²⁴ According to ŠEŠELJ, Croatia would be reduced to the size one "can see from the Zagreb Cathedral tower".³²⁵ With respect to BiH, ŠEŠELJ's position was that Muslims were not a people, indicating that they had no right to territory. He claimed that BiH was Serbian,³²⁶ and "if any Muslim fundamentalists do not like that, they will have to pack their suitcases and leave".³²⁷

109. As early as May 1991, ŠEŠELJ and **KARADŽIĆ** met at Romanija to promulgate the idea of Serbian lands and Chetnikhood in BiH.³²⁸ They met on several other occasions in BiH during the conflict period.³²⁹ ŠEŠELJ shared the BSL's policies and referred to **KARADŽIĆ** as "the true leader of the Serbian people" who "enjoys undivided trust".³³⁰ ŠEŠELJ contributed to the efforts of creating interlinked homogeneous Serb-controlled areas by providing SRS volunteers to fight within the Serb Forces in Croatia³³¹ and BiH.³³² ŠEŠELJ communicated with **KARADŽIĆ** regarding the deployment of his volunteers in BiH.³³³ SRS volunteers were integrated into the Serb TO and subsequently the VRS.³³⁴ SRS volunteers became infamous for

³²¹ P1105,p.20; P1108; P2854; P2858. *See also* P6371,pp.3-10; [REDACTED].

³²² P2858. *See also* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

³²³ V.ŠEŠELJ:D3665,para.15; P6388.

³²⁴ V.ŠEŠELJ:D3665,para.15; M.BABIĆ:P742,pp.16-17; P6390,p.1; P2527,p.2; P6387,p.6; P6389,p.6; P6391,p.1.

³²⁵ P6390; V.ŠEŠELJ:T.39579-39580.

³²⁶ V.ŠEŠELJ:D3665,para.15; V.ŠEŠELJ:T.39547-39548,39558-39559; P6389,p.6; P6390,p.1; P6391,p.1.

³²⁷ V.ŠEŠELJ:T.39547-39548; P6387,p.6.

³²⁸ P2527; V.ŠEŠELJ:D3665,para.36; V.ŠEŠELJ:T.39542-39544; P6387,pp.1-2; D1281.

³²⁹ V.ŠEŠELJ:D3665,para.37; D3666.

³³⁰ V.ŠEŠELJ:T.39543-39546; P6387,pp.1-2; P2527.

³³¹ V.ŠEŠELJ:D3665,para.24; V.ŠEŠELJ:T.39547; M.BABIĆ:P742,pp.17-18.

³³² V.ŠEŠELJ:D3665,paras.29,46,50,55-61; P6388; D825,pp.25-26. *See* Bijeljina, Zvornik, Brčko, Iliđža and Vogošća Summaries.

³³³ P2228.

³³⁴ III.C.8.(k): TO; III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

their brutality and crimes against non-Serb populations in both Croatia and BiH.³³⁵

C. Implementation of the common purpose

1. Preparations to create a Serb-dominated state within BiH

110. From at least 1990, **KARADŽIĆ** insisted that "under no circumstances" would Serbs accept becoming a national minority outside Serbia and that Bosnian Serbs would "never allow a state border to separate them from Serbia."³³⁶

111. In response to the early stages of Yugoslavia's disintegration and its implications for BiH, the BSL commenced preparations for a possible separation of Bosnian Serbs and Bosnian Serb territory from BiH. **KARADŽIĆ** directed the mobilisation of Bosnian Serbs.³³⁷ 26 training camps for special police units led by instructors trained in Croatia were established in RSK and RS.³³⁸

112. Regionalisation began with the establishment of communities of municipalities and led to autonomous regions or districts.³³⁹ This initial effort to earmark territories within BiH considered by the BSL to be Serbian³⁴⁰ was used to build a new Bosnian Serb polity with the intent of superseding BiH as it existed in 1991.³⁴¹ As with most steps toward the division of BiH and the forcible separation of its peoples, regionalisation was **KARADŽIĆ**'s creation. He repeatedly bragged about his responsibility for it.³⁴²

113. Regionalisation was among the steps that **KARADŽIĆ** had prepared in advance, to implement when he considered the timing right.³⁴³ Thus, when negotiations known as the "historic agreement" appeared to have failed,³⁴⁴ **KARADŽIĆ** convened a plenary of his officials to transform the communities of

³³⁵ III.C.8.(k): TO; III.C.8.(l): Paramilitaries/Volunteers/Serbian MUP. *See* Bijeljina, Zvornik, Brčko, Iliđža and Vogošća Summaries.

³³⁶ P2539,pp.6-8. *See also* D269,p.6.

³³⁷ P5887,pp.3-5; P5884; D290; P5826; P3406; S.VESELINOVIĆ:T.45100; D4501.

³³⁸ P4263,p.3; M.MARTIĆ:T.38125,38149; D277,p.3.

³³⁹ P.TREANOR:P2536,paras.117-118.

³⁴⁰ P.TREANOR:T.14015.

³⁴¹ R.DONIA:T.3407-3410.

³⁴² P2556,pp.6,11. *See also* P1084,p.4; D424,p.8; P5619,p.3.

³⁴³ P1387,pp.74-75; P953,p.3.

³⁴⁴ P.TREANOR:P2538,paras.60,66; P2543.

municipalities into autonomous regions or districts.³⁴⁵

114. Regionalisation was intended to "destroy Alija's state"³⁴⁶ by "[breaking] up" BiH, "[tearing] it apart with some narrow organisational parts",³⁴⁷ and to serve as a link in **KARADŽIĆ**'s chain of command, particularly in the Krajina region, discussed in detail below.³⁴⁸

115. In mid-October 1991, the joint BiH Assembly considered a proposed platform and memorandum supporting BiH sovereignty. Despite **KARADŽIĆ**'s threat that Muslims were risking a "highway of hell"³⁴⁹ and would be destroyed, the parliament adopted the platform.³⁵⁰ To the BSL, whose deputies left the Assembly before the vote on sovereignty, this was a galvanising and watershed event. The SDS Political Council met immediately afterward and discussed various possible responses, including setting up a parallel government, intensifying regionalisation and organising militarily.³⁵¹

116. Over the following days, **KARADŽIĆ** and his team pushed forward. As he told the Deputies' Club on 18 October 1991: "A team made up of the leading men of the party, the Government and the Political Council has been working day and night. I have decided to impose a state of emergency in the party."³⁵² That day, **KARADŽIĆ** announced the state of emergency to municipal boards, calling for daily meetings and 24-hour shifts.³⁵³ On 26 October, **KARADŽIĆ** chaired a meeting in Banja Luka of municipality presidents which resulted in orders to, *inter alia*, form commands and set up round-the-clock guard duty, and to "take over power in public firms, post office, account-keeping institution, administration of justice and especially in mass communication media", with BRĐANIN responsible for coordinating its implementation.³⁵⁴

³⁴⁵ P.TREANOR:P2536,paras.135-136; P.TREANOR:T.14016-14019. *See also* V.KUPREŠANIN:P6510,p.5; P2544,p.3; P2530; P2545,p.1.

³⁴⁶ D456,p.70. *See also* p.68.

³⁴⁷ P1377,p.175; P2545,p.1.

³⁴⁸ *See* III.C.8.(g).(vii): The ARK as an example of CS implementation of the common criminal plan.

³⁴⁹ D267,p.3.

³⁵⁰ P.TREANOR:P2538,para.69.

³⁵¹ D294.

³⁵² P2581,p.4.

³⁵³ P6238.

³⁵⁴ P2548.

117. By that point, the BSL was pursuing a two-track approach: continuing to see what negotiations might yield, while nevertheless moving toward Serb-controlled structures and territory. The final option, as **KARADŽIĆ** told his officials in November, was war and "[i]n that case, let the chips fall where they may".³⁵⁵ He explained that no one was capable of opposing the Serbs and that the war would be "bloody and rough for sure and many things would be decided and solved by it."³⁵⁶

118. **KARADŽIĆ** and the BSL complemented preparations towards a Serb state with a propaganda campaign aimed at fomenting fear and mistrust of non-Serbs. The BSL reminded the Serb people of WWII crimes committed against Serbs and the renewed dangers they purportedly faced.³⁵⁷ [REDACTED]

[REDACTED] At 1991 rallies, **KARADŽIĆ** proclaimed that "Serbs are the only people in the world who were persecuted and killed only because they exist",³⁵⁹ and that the Serb leadership would "not let you be slaughtered like in 1941".³⁶⁰ **KARADŽIĆ**'s fixation on this theme caused OKUN to warn him, "if you keep talking about the genocide of the Serbs so much, you will commit a pre-emptive genocide".³⁶¹ In January 1992, prominent SDS member Jovan RAŠKOVIĆ stated that the Serb leadership had "burnt the fuse of Serbian people" in Croatia and Bosnia.³⁶² While Serbs in an independent BiH were not at risk of genocide, **KARADŽIĆ**'s position "pushes people into a war. He has an excuse in so far as to say that they caused it and we are only reacting to it. However, his reaction is without a doubt [a] pro-war one."³⁶³ [REDACTED]

119. On 24 October 1991, the Bosnian Serb Assembly, the first organ of a Serbian parallel governmental structure, was established, comprised primarily of SDS

³⁵⁵ P958,p.6.

³⁵⁶ P958,p.6. *See also* P2539,p.3.

³⁵⁷ *See e.g.* KDZ239:T.18912; KDZ239:P3336,p.7; P6540,p.1,1:44:11-1:45:04; P13;

P.RADIĆ:P1,pp.9,16.

³⁵⁸ [REDACTED]

³⁵⁹ P1939.

³⁶⁰ P6540,pp.2-3,2:14:34-2:15:50. *See further* B.TADIĆ:T.44397-44398. *See also* D1591; P956,pp.3-4; P5492,p.6.

³⁶¹ H.OKUN:P776,p.31.

³⁶² P6617,p.2.

³⁶³ P6617,p.2.

³⁶⁴ [REDACTED]

deputies.³⁶⁵ **KARADŽIĆ** told the Assembly that the Serbs faced "the same plans, the same criminals" as in WWII and that: "This is a historic step, this is the step with which the Serbian people are breaking the last illusions, recognising their enemies and rounding up their being in such a way that they can never be attacked again from inside."³⁶⁶ As **KARADŽIĆ** told **MILOŠEVIĆ** on the date the Assembly was formed, the Bosnian Serbs were moving forward to assert control over 65% of Bosnian territory.³⁶⁷

120. Two weeks later, a plebiscite on remaining in Yugoslavia was organised,³⁶⁸ which was invoked by **KARADŽIĆ** to justify territorial claims to all but five municipalities in BiH.³⁶⁹ In a speech to municipality presidents, deputies and other officials, **KARADŽIĆ** asserted that Muslims wanted to "move all the rabble, beggars and scoundrels" from Turkey to "our territories" but that Serbs would "not allow the demographic picture to change, either naturally or artificially." "[N]o Muslim foundation shall ever be laid [...] all foundations that are laid will be blown up." As he explained, "this is a fight to the finish, a battle for living space."³⁷⁰ **KARADŽIĆ** reminded his officials that "we will make a factual situation [...] [a]nd the factual situation will be the impossibility for Izetbegović to establish his authority in 70% of the territory."³⁷¹

2. Variant A/B

121. In late December 1991, **KARADŽIĆ** issued concrete instructions to prepare for asserting Serb control. At a 20 December 1991 meeting in Sarajevo,³⁷² **KARADŽIĆ** distributed Variant A/B to municipal SDS leaders,³⁷³ who in turn relayed them to their own municipal boards.³⁷⁴ Variant A/B directed municipal

³⁶⁵ P3121,p.4.

³⁶⁶ P1343,pp.57-58.

³⁶⁷ P2546,pp.1,7-8.

³⁶⁸ P.TREANOR:P2538,para.87.

³⁶⁹ D4555. *See also* D86,pp.37-41.

³⁷⁰ P958,p.6.

³⁷¹ P958,p.11.

³⁷² P5792,p.2; D215,p.59; P2550,p.3; M.KRAJIŠNIK:T.43857.

³⁷³ P5; P960; P3470; P2550; R.NEŠKOVIĆ:P2568,pp.61-74,199; R.NEŠKOVIĆ:D1278,pp.27-28; R.KALABIĆ:P6550,pp.3-4; S.MIŠKOVIĆ:P6587,p.39; S.MIŠKOVIĆ:T.45362-45364,45374-45375; S.MIŠKOVIĆ:D4206,para.10; G.KLIČKOVIĆ:D4313,para.10; G.KLIČKOVIĆ:T.46835,46857; G.KLIČKOVIĆ:P6662,p.32; N.PRSTOJEVIĆ:T.12940-12942.

³⁷⁴ D.HANSON:P2589,para.20; **Ključ**:P2592; P6550,pp.3-4; **Bratunac**:P2598; M.KATANIĆ:P4374,paras.15-16; M.KATANIĆ:T.24526; **Novo Sarajevo**:P2575;

leaders to implement the instructions in two stages. In the first stage they were to form CSs, proclaim Serbian Assemblies and carry out "preparations for the establishment of municipal government organs".³⁷⁵ In the second stage SDS leaders would, *inter alia*, mobilise Serbian police and subordinate them to JNA command, call up JNA reserves and TO units and "[t]ake over the staff, buildings and equipment of security services centres and place them at the disposal of the newly established organs of the interior at the seat of the centre."³⁷⁶ The second stage would be activated by an order given exclusively by **KARADŽIĆ**, according to a "secret procedure".³⁷⁷

122. Variant A/B established the bodies that would be among the primary instruments through which **KARADŽIĆ** and the BSL asserted control over territories and removed non-Serbs.³⁷⁸ As one Defence witness put it, "in case we were supposed to secede, we had to have bodies that functioned already",³⁷⁹ noting that the takeover of power in his municipality was part of the implementation of Variant B.³⁸⁰

123. **KARADŽIĆ** supervised the implementation of Variant A/B. Immediately after issuing it, **KARADŽIĆ** and KRAJIŠNIK discussed tasking Jovan ČIZMOVIĆ, the republic coordinator with the ARK and other SAOs,³⁸¹ and Council of Ministers member,³⁸² to travel to the field to ensure its implementation.³⁸³ Over the following weeks, ČIZMOVIĆ reported back to **KARADŽIĆ** on municipal implementation³⁸⁴ emphasising that "instructions must be carried out".³⁸⁵ **KARADŽIĆ** also issued direct instructions on implementation, telling an interlocutor on 7 January 1992, "[i]t is time to take over real functions [...] In the sense of [...] that paper of ours ... level one—

M.STAKIĆ:T.45227-45228; R.NEŠKOVIĆ:P2568,pp.66-67,75,200-201; Z.SALIPUR:T.31630-31632; **Bosanska Krupa**:P6661; **Sarajevo**:P2532; **Foča**:P3337,p.2; P6264,p.1; R.MLADENOVIĆ:T.36628-36630-36632; **Zvornik**: [REDACTED]; KW317:T.39329; P2590;

Sokolac:P5783,p.2. *See also* R.NEŠKOVIĆ:P2568,pp.62-64.

³⁷⁵ P5,pp.3,6-7.

³⁷⁶ P5,pp.5-6,9.

³⁷⁷ P5,p.10.

³⁷⁸ *See* D.HANSON:P2589,para.24; P.TREANOR:P2536,paras.61,63,66; R.DONIA:P973,pp.22-23; S.MIŠKOVIĆ:P6587,p.60; S.MIŠKOVIĆ:T.45365-45367,45378,45381.

³⁷⁹ S.MIŠKOVIĆ:P6587,p.60.

³⁸⁰ S.MIŠKOVIĆ:T.45378,45381.

³⁸¹ D86,p.34; P1345,p.6.

³⁸² P.TREANOR:P2536,p.162.

³⁸³ P2550,p.3. *See also* P2551.

³⁸⁴ P2553,pp.5-7; P2552,p.7; P.TREANOR:T.14028-14035.

³⁸⁵ P2553,p.7.

level two."³⁸⁶ The previous day, a Foča SDS official reported to **KARADŽIĆ** that "[w]e have formed a Serb municipality" and intended to do "everything as it is in the instructions."³⁸⁷

124. Defence witnesses repeatedly sought to downplay or simply deny the implementation of Variant A/B in their municipalities. Contradicted by their own previous statements or actions³⁸⁸ and contemporaneous documentation from their municipalities,³⁸⁹ these efforts underscored the role of Variant A/B as a planned, centralised means of establishing and preparing the Serb municipal organs ultimately employed to implement the common criminal purpose. As **KARADŽIĆ** reminded Assembly members in 1994, "[d]o you remember the Instruction A and instruction B? We had Crisis Staffs, and it was clear that they were the authority."³⁹⁰

125. On 11 January 1992, the newly-constituted Council of Ministers held its first session with **KARADŽIĆ** and **KRAJIŠNIK**'s participation, including the discussion of tasks arising from the Declaration of the Promulgation of the Republic of the Serbian People of Bosnia and Herzegovina. The identified priorities were: (a) defining of ethnic territory, (b) establishment of government organs in the territory, and (c) economic disempowerment of the current authorities.³⁹¹

126. On 26 January 1992, the Bosnian Serb Assembly met in extraordinary session to consider how to respond to a further step toward Bosnian independence.³⁹² Deputy **VJEŠTICA** noted the immense duties they faced "because we are setting up our own state", and proposed establishing an "operative plan" to define tasks and deadlines.³⁹³

³⁸⁶ P2596,p.7.

³⁸⁷ P3337,p.2.

³⁸⁸ See e.g. DCC(G.KLIČKOVIĆ; B.GRUJIĆ; KW317; R.KALABIĆ; D.STOJIC; R.ĐUKANOVIĆ; T.SAVKIĆ; M.KRAJIŠNIK).

³⁸⁹ See e.g. **Zvornik**:P2590; P2591; B.GRUJIĆ:D3724,para.18; B.GRUJIĆ:T.40367;

[REDACTED]; **Ključ**:P2592; R.KALABIĆ:T.44553-44554; **Sarajevo**:P2532; D.HANSON:T.14508-14509; **Novo Sarajevo**:P2575; P6066; P6055; R.NEŠKOVIĆ:P2568,pp.74-

79,82-83; R.NEŠKOVIĆ:T.14352-14354; **Iliđa**:P975; M.ČEKLIĆ:T.35210-35212;

N.PRSTOJEVIĆ:T.12952-12954; R.KEZUNOVIĆ:P2526,paras.38,41,46,54; **Foča**:P3337,p.2;

P6264,p.1; R.MLAĐENOVIĆ:T.36628-36632,36681-36682; **Rogatica**:P3407,p.5;

T.BATINIĆ:T.33669-33670; S.VESSELINOVIĆ:D2950,para.13; S.VESSELINOVIĆ:T.33877;

Tuzla:P2593; **Donji Vakuf**:P2594; **Ilijaš**:P5786; **Bosanska Krupa**:P6661; **Prijedor**:P2595;

Doboj:P6418,p.2; **Brčko**:D.RISTANIĆ:P3023,paras.1,35,41-44. See also **Bosanski Novi**:P2632,p.1; R.PAŠIĆ:T.41013-41014; **Vlasenica**:P6121.

³⁹⁰ P1403,pp.347-348. See also P970,p.316.

³⁹¹ P1082,p.2.

³⁹² M.KRAJIŠNIK:T.43871-43872.

³⁹³ P1349,p.12.

ČIZMOVIĆ then stated to the Assembly that it was indeed time for "urgent operationalization" and that therefore, "[t]asks set out in the instructions of 19 December 1991 [Variant A/B] should be carried out."³⁹⁴

127. The BSL's insistence on remaining in Yugoslavia gave way to a plan for a divided or "transformed"³⁹⁵ BiH within which a Serbian BiH would be created. As **KARADŽIĆ** explained to his officials on 28 February 1992:

Please, until two or three months ago we were hoping to be able to play the "Yugoslav card" and to say, the Yugoslav army, Yugoslavia, legality, etc. This is slipping out of our grasp. That's why we started on another track: a Serbian Bosnia and Herzegovina. Our sovereign right, our army.³⁹⁶

128. At the same time, the BSL strove to ensure that the Serb borders within BiH encompassed as much land as possible, as **KARADŽIĆ** emphasised in February 1992:

Our strategic goals are beginning to materialise [...] We accept, and I say BH must remain within these borders. Great. Now let us turn to internal /borders/. And once that is done, once they are wider than the external borders, then we can say, "Who cares about external borders." What matters is that the ones within BH become as wide as possible. As the popular saying goes, "If kicked out the door go back through the window". You will still be in the same place.³⁹⁷

129. On 14 February 1992, **KARADŽIĆ** held an extended session of the SDS Main and Executive Boards to activate the second level of Variant A/B. He told his officials that "now it would be more important to gain the real situation, the factual situation on the ground."³⁹⁸ The BSL would thus be in a position to say "maybe the Muslims are right, but the factual situation is so and so [...]".³⁹⁹ Given the current situation—ongoing negotiations, the imminence of the referendum and presence of European monitors⁴⁰⁰—**KARADŽIĆ** reminded his officials of the importance that there be no fleeing of Muslims and Croats "in our areas".⁴⁰¹ But "stage number two should also be converted" in order to have authorities in the field functioning "that a

³⁹⁴ P1349,p.14.

³⁹⁵ P1349,pp.2,8.

³⁹⁶ P938,p.37.

³⁹⁷ D88,p.20.

³⁹⁸ P12,p.5.

³⁹⁹ P12,p.5.

⁴⁰⁰ P12,pp.8,13-14.

bird cannot fly over really."⁴⁰² He concluded "that is why we called you today, to intensify, to introduce the 'second level' and to intensify the functioning of the government at any cost and on every single millimetre of our territory."⁴⁰³ As before, this instruction was relayed to local SDS officials.⁴⁰⁴ On 24 February 1992, the SDS Executive Board appointed coordinators to work with regional CSs, including the ARK.⁴⁰⁵

3. Countdown to war

130. Having activated the second level on 14 February to "gain the real situation, the factual situation on the ground",⁴⁰⁶ **KARADŽIĆ** made plans the next day at the 7th RS Assembly to check on the capacities to do so. **ČIZMOVIĆ** was to:

spend the next week on wheels, first paying visits to the regional centres, in Trebinje, Bijeljina, Doboj, Banja Luka and with us here in Sarajevo, and then going to the smaller towns, in order to establish, or perhaps authorise someone else in each municipality to do that [...] to establish how elements of the authorities really work [...] a check up and a reminder to those municipalities who have not taken care of all the preparations that they must do so.⁴⁰⁷

131. Meanwhile, negotiations under the auspices of the European Community continued, sometimes promising from the Bosnian Serbs' view and sometimes discouraging. As **KARADŽIĆ** told Assembly representatives on 11 March, "three months we are on one point and we consider that we have made some progress and then, tomorrow, they retreat to their starting point, to zero and annul everything."⁴⁰⁸

132. He reminded them, however, of the two-track approach: "Fortunately we have not been relying on those talks but have created preconditions for the security of the Serb people in their ethnic space within BiH, thus they will not putting us around.

⁴⁰¹ P12,p.5.

⁴⁰² P12,p.17.

⁴⁰³ P12,p.24. *See also* P12,pp.5-7,17. *See also* P.TREANOR:P2536,para.64; P.TREANOR:T.14035; R.DONIA:P973,pp.24-25.

⁴⁰⁴ *See e.g.* **Prijedor**:P5516; **S.MIŠKOVIĆ**:P6587,pp.42-49; **S.MIŠKOVIĆ**:T.45367-45375; P6551,p.23; **Ključ**:P6551,p.6; **Bratunac**:P2597; **M.KATANIĆ**:P4374,para.18; **Zvornik**:KW317:T.39335-39337.

⁴⁰⁵ D.HANSON:P2589,para.30. *See also* P6530; D3166.

⁴⁰⁶ P12,p.5.

⁴⁰⁷ P1351,p.59.

⁴⁰⁸ P1353,p.7.

They have not succeeded in this, as we have not passed the opportunity to complete all the actions necessary for the protection of Serb people."⁴⁰⁹

133. By 18 March, the BSL considered that negotiations had taken a positive turn. An agreement in principle had been reached that further negotiations would proceed on the basis of three constituent units in significant part based on the ethnic principle.

134. KRAJIŠNIK expressed concern, however, about the viability of the agreement. "Why they accepted this, I still fail to understand."⁴¹⁰ The basic problem, he noted, was that the Muslims and Croats "want [BiH] to be internationally recognised at any cost. They want it to be a state." He therefore proposed, "for strategic reasons", that "we could start implementing what we have agreed upon, the ethnic division on the ground."⁴¹¹

135. Deputies supported creating a *de facto* situation,⁴¹² with VJEŠTICA from Bosanska Krupa requesting, "Mr. President, I think that you have to give us an order, that after the next Assembly you should order this, that we arrange it for the areas where it has not been done and to implement this: that the Serbs should occupy their territories so that no other forces could enter them."⁴¹³

136. **KARADŽIĆ** described a framework that would detach the Serbs from BiH, effectively creating a Serbian state. "[W]e have led them into 'the waters' into which we wanted to lead them."⁴¹⁴ Thus, the "only remaining question is the one of quantity," *i.e.*, what functions and how much territory a Serbian BiH would encompass. That, according to **KARADŽIĆ**, "will happen according to the actual conditions which are up to you to create."⁴¹⁵

137. **KARADŽIĆ** advised that the next moves were imminent—"[i]t will all be happening in a flash"—that round-the-clock work from the Council of Ministers was needed and that they had already obtained badges for a separate MUP.⁴¹⁶

⁴⁰⁹ P1353,p.7.

⁴¹⁰ D90,p.13.

⁴¹¹ D90,p.13.

⁴¹² *See e.g.* D90,pp. 23-24,28,30.

⁴¹³ D90,p.39.

⁴¹⁴ D90,p.43.

⁴¹⁵ D90,pp.43-44.

⁴¹⁶ D90,p.45.

138. A week later, on 24 March, the Assembly discussed the creation of the NSC.⁴¹⁷ **KARADŽIĆ** pointed out that, while it was technically an advisory body to the Assembly, it "will be composed of all the important organs and institutions" and "may have to convene every day" to make important decisions on war and peace. It should therefore have "certain competencies which would be binding for the executive organs, MUP and Government, and would subsequently be approved by the Assembly".⁴¹⁸

139. He also made clear that a Serb takeover of power was imminent, noting that a separate MUP was about to be established and that "following some instructions for national defence, information systems, etc. that will be given here, the real and sovereign authority of the Serbian Assembly and Serbian people be established on the ground as soon as possible."⁴¹⁹

140. **KARADŽIĆ** also assured his officials that they could count on the army for "the final countdown and for the final establishment of authority", including if the other side establishes an unjust border—"we would then establish a just border."⁴²⁰

141. These imminent actions corresponded to BSL perceptions about the imminence of Bosnian independence. A proposed Bosnian Serb Official Communiqué pointed out that local parties as well as some European factors were trying to accomplish the recognition of BiH's independence as soon as possible.⁴²¹

4. The municipality takeovers

142. Immediately before the conflict began, **KARADŽIĆ** held a meeting of presidents of municipalities, municipal boards, executive boards, deputies—"a very extended meeting".⁴²² He told them that the conflict would probably erupt very soon and that their tasks were to protect Serbs and create Serbian territories where Serbs were the majority. He asked whoever was not ready or capable of accepting such events to leave.⁴²³ All but three attendees remained,⁴²⁴ and the stage was set for

⁴¹⁷ See III.C.8.(d): National Security Council (NSC).

⁴¹⁸ P961,pp.14-15.

⁴¹⁹ P961,p.16.

⁴²⁰ P961,p.17.

⁴²¹ P1354,p.7.

⁴²² B.GRUJIĆ:T.40373.

⁴²³ B.GRUJIĆ:T.40373-40374. GRUJIĆ did not specify the date. However, at the 12th RS Assembly on 24 March, **KARADŽIĆ** referred to a "plenary session" held the night before:P961,pp.17-18.

KARADŽIĆ's predicted "highway of hell".

143. Shortly thereafter, Serb takeovers began, first in Bijeljina, then Zvornik, with the "strong support"⁴²⁵ of the Serbian DB. ARKAN worked with SDS forces to brutally take over power and commence the killing and expulsion of the Muslim communities. Zvornik was **KARADŽIĆ**'s specific example when explaining to his officials only days earlier that "in the next three or four days, there will be a single method used and you will be able to apply it in the municipalities you represent, including both things that must be done as well as how to do them. How to separate the police force, take the resources that belong to the Serbian people and take command."⁴²⁶

144. Other municipalities were not far behind. In Foča, a municipality where republic-level officials oversaw operations,⁴²⁷ the attack by Serb Forces began on 8 April. By 30 April, OSTOJIĆ reported to the RS government that Foča's Serb authorities had control in the "liberated areas".⁴²⁸ In Bratunac, the attack was led by CS President DERONJIĆ, whom **KARADŽIĆ** relied upon throughout the conflict. There, the SDS similarly combined with ARKAN and the JNA to take over the municipality and attack Muslims. By the beginning of June, Bratunac representatives reported to **KARADŽIĆ** that "[t]here are no Muslims now in Bratunac municipality"—it was "fully liberated".⁴²⁹

145. As **KARADŽIĆ**'s municipal officials worked with Serb Forces to begin implementing ethnic division in various municipalities, **KARADŽIĆ** oversaw the continued development of RS state organs such as the NSC,⁴³⁰ while overseeing first-hand the division of Sarajevo and the initiation of the shelling and sniping campaign that would span the length of the conflict.

146. Having formed, on **KARADŽIĆ**'s order, brigades or TO units commanded by

⁴²⁴ B.GRUJIĆ:T.40374.

⁴²⁵ P1478,p.133.

⁴²⁶ P961,p. 22.

⁴²⁷ See Foča Summary.

⁴²⁸ P4986,p.1.

⁴²⁹ P1478,pp.93-95,98,101.

⁴³⁰ III.C.8.(d): National security council (NSC).

CS presidents,⁴³¹ the SDS also worked with sympathisers in the JNA, such as Bogdan SUBOTIĆ, who would soon become Minister of Defence,⁴³² Dragomir MILOŠEVIĆ,⁴³³ and Dušan KOVAČEVIĆ.⁴³⁴ The SDS also collected and distributed arms, often with JNA assistance.⁴³⁵

147. **KARADŽIĆ** oversaw his Sarajevo-area commanders directly⁴³⁶ or via close collaborators such as KRAJIŠNIK⁴³⁷ or immediate subordinates such as MANDIĆ⁴³⁸ and M.STANIŠIĆ.⁴³⁹ He continued to ensure that those suitable for the tasks ahead were in place. When frictions developed in Ilidža, he and the BSL ensured that PRSTOJEVIĆ—a known extremist even by BSL standards⁴⁴⁰— held power over more moderate rivals.⁴⁴¹

148. By mid-April, **KARADŽIĆ** already acknowledged the intention to divide Sarajevo in two,⁴⁴² aimed in part at taking as much industry as possible.⁴⁴³ Indeed, when MANDIĆ told an interlocutor about the limited areas that were envisioned for Muslims, his interlocutor described it as "nothing", to which MANDIĆ agreed—"Fuck them. They didn't want to do it nicely through negotiations. Well now, they'll get nothing."⁴⁴⁴

149. This objective was duly implemented. For example, after an "encourag[ing]" mid-April visit to Ilidža by **KARADŽIĆ**,⁴⁴⁵ his local forces "extended their territory in some areas, driving the Muslims out of the territories where they had actually been majority."⁴⁴⁶ As **KARADŽIĆ** himself would say more generally shortly after that visit, "[w]e are controlling the Serbian settlements in the city—and expanding

⁴³¹ P970,p.298. *See also* P970,pp.316-317; P968,pp.1-2; D568,p.1; P5737.

⁴³² P970,pp.316-317; B.SUBOTIĆ:D3695,para.2.

⁴³³ A.DŽAMBASOVIĆ:P2828,paras.76-77,79; A.DŽAMBASOVIĆ:T.15157.

⁴³⁴ P979,p.6; P1477,p.296; P5583,p.6; D.KOVAČEVIĆ:T.39346-39349,39649-39650.

⁴³⁵ *See* III.C.8.(a).(iii): The SDS implemented the common criminal plan.

⁴³⁶ *See e.g.* D331; P5742; P5743,p.4; [REDACTED].

⁴³⁷ *See e.g.* P5738.

⁴³⁸ *See e.g.* P1085; P5721; P1147; P5712.

⁴³⁹ *See e.g.* P5612; P5711; P5627; P2229.

⁴⁴⁰ M.MANDIĆ:T.4515; [REDACTED].

⁴⁴¹ *See also* P1086,p.3; P1515,p.1.

⁴⁴² P1085; M.MANDIĆ:C2,p.29; P2528,pp.2-3; [REDACTED]; R.KEZUNOVIĆ:T.13887.

⁴⁴³ P780,p.36.

⁴⁴⁴ P1478,p.99.

⁴⁴⁵ P1103,p.8.

⁴⁴⁶ D92,p.66; P2528,pp.1-2; N.PRSTOJEVIĆ:T.12963-12964.

⁴⁴⁷ D92,p.66.

them."⁴⁴⁷

5. Formalisation of ethnic separation at the 16th Assembly and establishment of VRS to implement

150. **KARADŽIĆ** would later refer to these early weeks of the war—during which Serb Forces took over municipalities and began permanently removing non-Serbs through killings, expulsions and other crimes⁴⁴⁸—as the time when the armed forces of the SDS and the police "liberated and created the space".⁴⁴⁹ Despite the successes of the Serb TO, RSMUP, JNA and paramilitary forces in this period, by mid-May they had "failed to achieve the main strategic objectives of the armed struggle of the Serbian people in former BH", including opening up and securing a corridor linking Herzegovina with the FRY via the Drina River Valley. They had also failed to gain control over "a considerable part of the territory of former BH" which—according to the BSL—"historically and ethnically belongs to the Serbian people".⁴⁵⁰

151. On 12 May 1992, at the 16th RS Assembly—the first since the outbreak of the conflict, **KARADŽIĆ** articulated the six strategic objectives, which constituted the core political and military goals of the BSL until the end of the war; the VRS was formally established; MLADIĆ was appointed as VRS-GŠ Commander;⁴⁵¹ and the RS Presidency was elected, comprising **KARADŽIĆ**, PLAVŠIĆ and KOLJEVIĆ.⁴⁵²

(a) The strategic objectives as articulated at the 16th Assembly

152. The strategic objectives had been discussed and identified in two earlier meetings to "clearly define the objective of the war"⁴⁵³ between **KARADŽIĆ**, KRAJIŠNIK, MLADIĆ and military figures including JNA Chief of General Staff General Blagoje ADŽIĆ on 6-7 May.⁴⁵⁴ As discussed below, also prior to the 16th Assembly, **KARADŽIĆ** chose MLADIĆ to head the VRS.⁴⁵⁵

153. **KARADŽIĆ** commenced the 16th Assembly by updating deputies on the

⁴⁴⁷ P1477,p.257.

⁴⁴⁸ See Municipality Narratives.

⁴⁴⁹ P970,pp.315-317. See also P1383,p.13; P1383,p.57; P5492,p.8.

⁴⁵⁰ D325,p.69.

⁴⁵¹ P956,p.53.

⁴⁵² P956,p.54.

⁴⁵³ P1477,p.256.

⁴⁵⁴ P1477,pp.256,262. See also P956,pp.32,49.

⁴⁵⁵ See III.C.8.(i).(i): VRS structure and mission.

situation in BiH, referring to various "war conflicts" taking place, including those which "ended successfully in Foča, Zvornik and Višegrad".⁴⁵⁶ He then announced the strategic goals.

154. The first strategic goal was separation from the other two ethnic communities, or separation of states. This was the "most important" goal, and "all other goals are sub-items of the first one."⁴⁵⁷ It reflected the perceived need to separate from "those who are our enemies and have used every opportunity, especially in this century, to attack us, and who would continue with such practices if we were to stay together in the same state."⁴⁵⁸

155. The second goal—establishing a corridor between Semberija and Krajina—was of the "utmost strategic importance for the Serbian people, because it integrates the Serbian lands", linking the Krajina in the west with Semberija and Serbia in the east, and giving the Serbs an "unimpeded flow from one part of our state to another".⁴⁵⁹ KRAJIŠNIK emphasised to the Assembly that "[t]he size of the corridor depends on you", adding that a 30km wide corridor could be defended while a 5km wide corridor could not.⁴⁶⁰

156. The third goal was the establishment of a corridor in the Drina Valley, and the elimination of the Drina as a border between the RS and Serbia. **KARADŽIĆ** explained that "[w]e are on both sides of the Drina, and our strategic interest and our living space are there." While he anticipated the possibility of Muslim enclaves, "that belt along the Drina must basically belong to [the RS]." Achieving this goal would, according to **KARADŽIĆ**, have the additional benefit of preventing the Muslims from connecting to the "Muslim International".⁴⁶¹ This connection was the so-called "green transversal", linking Muslims in BiH with Muslims in Sandžak in the FRY, through which Muslims from outside would supposedly flock to Bosnia.⁴⁶²

157. The fourth goal was the establishment of borders along the Una and Neretva rivers.

⁴⁵⁶ P956,p.8.

⁴⁵⁷ P956,p.45.

⁴⁵⁸ P956,p.9.

⁴⁵⁹ P956,p.9.

⁴⁶⁰ P956,p.45.

⁴⁶¹ P956,p.9.

⁴⁶² See e.g. D456,p.14; S.VESELINOVIĆ:T.45110-45111.

158. The fifth was the division of the city of Sarajevo into Serbian and Muslim parts.⁴⁶³

159. Finally, the sixth strategic goal was access to the sea. Introducing this goal, **KARADŽIĆ** stated that while "not unimportant", some goals were "more important [...] or more feasible than others".⁴⁶⁴

160. Achieving these goals would, according to **KARADŽIĆ**, "finally finish the job of the freedom struggle of the Serbian people" and dispense with the "Serbian illusion of brotherhood and unity, especially one which transcends the boundaries of religion".⁴⁶⁵

161. Given their scope, executing these goals necessitated not only mono-ethnic control over intermingled territories but in many cases the "liberation" or "conquest" of territories which were not predominantly Serb and the expulsion of non-Serbs from those territories. Those present at the 16th Assembly who would implement these goals on the ground clearly understood these implications:

- Dr. BELI from Brčko, commenting on the "tasks set by our president", stated, as regards the creation of a corridor between Semberija and Krajina, that while "the operations to establish this communication have been completed, to a degree, in the military aspect", Brčko itself remained "uncompleted", and "for definitive [*čišćenje*—cleansing/mopping up] of the area it will be necessary to have many more forces there".⁴⁶⁶ Recognising that the "conquests that are currently necessary" included "parts like Brčko, where we are 20%", Dr. BELI appealed to **KARADŽIĆ** and **KRAJIŠNIK** to promote mobilisation.⁴⁶⁷
- Minister of Health Dragan **KALINIĆ**,⁴⁶⁸ exhorting that the enemy must be "physically, militarily destroyed and crushed, which, of course, implies eliminating and liquidating their key people", advocated the "war option", "[b]ecause only what has been conquered militarily can be really and truly ours." Speaking frankly "since we are in a closed session of the Assembly", **KALINIĆ** warned that it should be made clear to "our people" that ceasefire

⁴⁶³ See Sarajevo Municipality Summaries.

⁴⁶⁴ P956,p.10.

⁴⁶⁵ P956,p.10.

⁴⁶⁶ P956,p.12.

⁴⁶⁷ P956,pp.12-13.

⁴⁶⁸ P3051,p.3.

statements designed to "demonstrate to Europe that we are in favour of negotiations and a peaceful solution" were "just a statement for external, public use", while the ceasefire would be used "to consolidate our armed force and military forces". Referring to those "who still live as vipers in our bosom", KALINIĆ advocated the destruction of TV buildings and hospitals on non-Serb territory, the latter "so that the enemy has nowhere to go for medical help".⁴⁶⁹

- Bosanska Krupa deputy Miroslav VJEŠTICA reminded deputies that "only 24% of the population are Serbs in the Serbian Municipality of Bosanska Krupa", and continued: "On the right bank of the Una river there are no more Muslims in the Serbian Municipality of Bosanska Krupa, all the enclaves that were there [...] we have evacuated them [...] Will they have a place to return to? I think it is unlikely after our President told us the happy news that the right bank of the Una is the border."⁴⁷⁰
- Professor MILOJEVIĆ, RS Minister of Spatial Planning and Development,⁴⁷¹ highlighted the problem of "how to endure", once war was over and democracy began, in those conquered territories in which the Serbs were a minority, stating "[j]ust imagine, we hold enormous areas which now, in the war option, are ours, but which, overnight, may cease to be ours, where we comprise up to 30%". The solution, according to MILOJEVIĆ, required the resettlement of the Serb population into those areas in which they were currently the minority.⁴⁷² MILOJEVIĆ had given the issue of how to create a Serb state some thought: as KARADŽIĆ later stated, KARADŽIĆ and MILOJEVIĆ were "making plans" as to which areas of Bosnia to take for strategic reasons "way back before the war".⁴⁷³

162. When MLADIĆ took the floor, he reminded the delegates that the strategic objective of separation was not easy to realise, stating: "People and peoples are not pawns nor are they keys in one's pocket that can be shifted from here to there. It is

⁴⁶⁹ P956, pp.17-19.

⁴⁷⁰ P956, pp.20-21.

⁴⁷¹ P956, p.54. *See also* P3051, p.3.

⁴⁷² P956, p.29.

⁴⁷³ P1388, p.88.

something easily said but difficult to achieve."⁴⁷⁴ He also warned "The thing that we are doing needs to be guarded as our deepest secret."⁴⁷⁵

(b) The strategic objectives were the core political and military goals of the BSL until the end of the war

163. Throughout the conflict, the strategic objectives were repeatedly affirmed by **KARADŽIĆ**, **KRAJIŠNIK** and the BSL,⁴⁷⁶ and referenced by municipal representatives at the Assembly.⁴⁷⁷ In December 1993, for example, **KRAJIŠNIK** reminded deputies that "At the beginning of the war, the Assembly endorsed, as one of the most important documents, the strategic objectives of the Serbian people in Bosnia and Herzegovina, and organised the people to implement them."⁴⁷⁸ Emphasising their enduring importance, **KARADŽIĆ** reminded the Assembly in August 1995 that: "We've drawn some maps into which a part of the Neretva Valley could be integrated, and, of course, access to the sea. The Drina should be clean. These are all priorities, the corridor must be wide."⁴⁷⁹

164. The fundamental goal was ethnic separation, as **KARADŽIĆ** and **KRAJIŠNIK** repeatedly emphasised. "[T]he primary strategic goal of our people and this Parliament is partition and separation from Croats and Muslims";⁴⁸⁰ "[T]he goal is to separate ourselves".⁴⁸¹ As explained above,⁴⁸² this was not merely a desire for an independent state, but rather a desire for a state as ethnically homogenous or pure as possible.⁴⁸³ The separation contemplated by the first strategic objective included the separation of human beings from each other.⁴⁸⁴

165. The military played a central role in the implementation of the strategic objectives. As **MLADIĆ** stated at the 16th Assembly, "[t]o achieve a goal, you need forces".⁴⁸⁵ As discussed in detail below,⁴⁸⁶ the strategic objectives were both political

⁴⁷⁴ P956,p.33.

⁴⁷⁵ P956,p.34.

⁴⁷⁶ D92,pp.49,76,81; P1377,pp.40,49; P1379,pp.14-15,80,128-129; P1383,p.12; P1385,pp.108,128; P1387,p.67; P1390,p.41; P1394,p.76; P1403,pp.165,262; P988,pp.68,76; P1417,p.103; P1419,p.104.

⁴⁷⁷ See e.g. D92,p.65; D456,p.47; P1377,pp.55-56; P1379,pp.41,49,50; P988,p.41; P1417,pp.67,80.

⁴⁷⁸ P1383,p.12. See also p.13.

⁴⁷⁹ P988,p.68.

⁴⁸⁰ P1403,p.262. See also D92,p.49; P1387,p.67.

⁴⁸¹ P1390,p.41.

⁴⁸² See III.B.1: The goal of ethnic separation.

⁴⁸³ H.OKUN:T.1475.

⁴⁸⁴ R.DONIA:T.3081.

⁴⁸⁵ P956,p.32.

and military in nature and defined the VRS's tasks throughout the war.

(c) The strategic objectives were transformed into concrete results on the ground

166. The goals formalised the separation that **KARADŽIĆ**'s forces had already been pursuing and identified additional areas in which they would be applied. Following the 16th Assembly, RS civilian and military authorities worked together to continue implementing the goals—and the common criminal purpose—with full participation of the newly-restructured and reinforced RS armed forces.

167. The dissemination and implementation of the strategic objectives throughout the RS municipalities began immediately, with their communication to officers, conscripts, and municipal leaders. For example, in the ARK region, central to the second strategic objective:

- On 14 May 1992, military authorities and municipality presidents in the ARK, including 6th Brigade Commander BASARA and Ključ CS members BANJAC and deputy KALABIĆ met. Attendees were briefed on the conclusions from the 16th Assembly and informed of the six strategic objectives.⁴⁸⁷ Then Commander of the JNA 30th Division Stanislav GALIĆ proposed that attendees "implement the decisions from the meeting in Banja Luka, but submit them to the commands of units and municipalities". His proposal was unanimously adopted.⁴⁸⁸
- On the same date, BANJAC and KALABIĆ (who had also attended the 16th Assembly⁴⁸⁹) briefed the Ključ CS thereon, advising them "on the security situation in Ključ municipality, in connection with the decisions and reports" from that session, which were adopted by the CS.⁴⁹⁰
- On 18 May, Simo MIŠKOVIĆ briefed the Prijedor Municipal Board on the 16th Assembly and the strategic objectives.⁴⁹¹

⁴⁸⁶ See III.C.8.(i).(iii).a: **KARADŽIĆ**'s strategic direction to the VRS.

⁴⁸⁷ P3590,p.3.

⁴⁸⁸ P3590,p.4.

⁴⁸⁹ R.KALABIĆ:T.44577. See also P6373, listing KALABIĆ as attending the 16th Assembly.

⁴⁹⁰ P3439,p.2; R.KALABIĆ:T.44578.

⁴⁹¹ P6589; B.MANDIĆ:T.45774-45775.

- On 21 May, 1KK Commander General TALIĆ ordered all brigades and divisions to, among other things, "[e]xplain to conscripts as they arrive the goals of our struggle".⁴⁹² On the same date TALIĆ's assistant commander for morale and guidance sent a document to all Corps units explaining that the Serbian people were exposed to genocide and "must struggle for complete separation from the Muslim and Croatian peoples and form their own state."⁴⁹³

Through coordinated civilian and military action, the systematic permanent removal of non-Serbs through murder, expulsion and other forms of persecution ensued in Prijedor, Ključ, Sanski Most, Bosanski Novi and Banja Luka.⁴⁹⁴

168. In the Drina region—where cleansing operations had commenced well before the 16th Assembly—MLADIĆ emphasised the importance of the third strategic objective, ordering on 17 June 1992 that Birač Brigade combat readiness be raised "in order to have full control over the area of Birač and to secure the corridor between Romanija and Semberija and to maintain a link with Serbia".⁴⁹⁵ Meanwhile, civilian and military authorities throughout the Drina continued to pursue the first and third strategic objectives. On 18 May, MLADIĆ appointed Svetozar ANDRIĆ commander of the VRS Birač Brigade.⁴⁹⁶ On 28 May, ANDRIĆ ordered the Zvornik TO that "[t]he moving out of the Muslim population must be organised and co-ordinated with the municipalities through which the moving is carried out. Only women and children can move out, while men fit for military service are to be placed in camps for exchange."⁴⁹⁷ Three days later, Zvornik military, police and paramilitary forces began a massive expulsion and killing operation of Muslims from the Đulići area in Zvornik.⁴⁹⁸ The implementation of ANDRIĆ's order also gave rise to the need for Sušica Camp in Vlasenica which he ordered to be established on 31 May 1992;⁴⁹⁹ the continued success of cleansing operations and the resulting overcrowding of Sušica

⁴⁹² P3920,p.2.

⁴⁹³ P3921,p.2.

⁴⁹⁴ See Prijedor, Ključ, Sanski Most, Bosanski Novi and Banja Luka Summaries.

⁴⁹⁵ P3238,p.1.

⁴⁹⁶ P1477,pp.356-358; P6458,p.1.

⁴⁹⁷ P3055. ANDRIĆ's claim that he wrote this order to prevent paramilitaries improperly killing people in Zvornik (S.ANDRIĆ:T.41666) is patently untrue on the face of the order.

⁴⁹⁸ P.PANIĆ:P3380,pp.30-36; [REDACTED]

⁴⁹⁹ AF2706; P3240; S.ANDRIĆ:D3886,para.7; [REDACTED]; See SIC:C.25.3(Vlasenica).

resulted in the VRS-GŠ establishment of Batković camp in Bijeljina on 2 July.⁵⁰⁰ Similarly on 7 June, the Eastern Bosnia Corps ("IBK") Commander issued an order "to all subordinate[d] units" concerning multiple coordinated operations to "čistiti"—cleanse/mop-up—territory in northern and eastern Bosnia involving the IBK, SRK and 1KK.⁵⁰¹ Thus in Bijeljina, Zvornik, Vlasenica and Foča, the killing, detention and expulsion of non-Serbs continued.⁵⁰²

169. The fourth strategic objective was also swiftly implemented. Within two weeks of the Bosanska Krupa deputy hearing from **KARADŽIĆ** the "happy news" that the right bank of the Una river was to be the border, the Bosanska Krupa War Presidency proposed "destroy[ing] and pull[ing] down as many residential and other buildings as possible" on the Una's left bank, citing strategic objective 4 as its basis for this proposal, *i.e.*, the "Political determination to have the border of Serbian municipality AR Banja Luka, Serbian Republic of Bosnia and Herzegovina and Serbian state established along the river Una".⁵⁰³ The proposal's author, Gojko KLIČKOVIĆ publicly announced that "the River Una is the border of the Serbian state of Bosnia-Herzegovina [...] the border is stable at the moment and arrival of any Muslim formations or Muslim population to this area is not a possibility any longer. [...] there is not even a possibility of co-existence and let alone us living together."⁵⁰⁴

170. Thus, in its quest to "[liberate] territories which are ours and which belong to us by historical birthright",⁵⁰⁵ in the weeks and months following its establishment, the VRS—as well as RSMUP and other Serb Forces—attacked and killed non-Serbs in targeted areas across BiH, including Ključ,⁵⁰⁶ Prijedor,⁵⁰⁷ Novi Grad,⁵⁰⁸ Sanski Most,⁵⁰⁹ Foča,⁵¹⁰ Sokolac,⁵¹¹ Rogatica,⁵¹² and Vlasenica.⁵¹³

171. **KARADŽIĆ**'s subordinates reported to him and the BSL on the

⁵⁰⁰ P2890. *See also* P3238; P3731.

⁵⁰¹ P5400.

⁵⁰² *See* Bijeljina, Foča, Vlasenica and Zvornik Summaries.

⁵⁰³ P2616.

⁵⁰⁴ P6665; G.KLIČKOVIĆ:T.46876-46877.

⁵⁰⁵ D325,p.159.

⁵⁰⁶ *See e.g.* SIC:A.7.1-A.7.3(Ključ).

⁵⁰⁷ *See e.g.* SIC:A.10.1-A.10.6;A.10.9(Prijedor).

⁵⁰⁸ *See e.g.* SIC:A9.1(Novi Grad).

⁵⁰⁹ *See e.g.* SIC:A.12.1-A.12.4(Sanski Most).

⁵¹⁰ *See e.g.* SIC:A.5.4(Foča).

⁵¹¹ *See e.g.* SIC:A.13.1;A.14.2(Sokolac; Višegrad).

⁵¹² *See* Rogatica Summary.

implementation of the strategic objectives and efforts to permanently remove non-Serbs. For example, on 2 June, **KARADŽIĆ** and MLADIĆ met with ARK and RSK leaders, 1KK unit commanders and the VRS ViPVO Commander in Banja Luka.⁵¹⁴ The strategic objectives were discussed,⁵¹⁵ as was the "Problem of the Krajina: 14,500 Muslims".⁵¹⁶ As discussed above, **KARADŽIĆ** received updates on the removal of Muslims from Bratunac,⁵¹⁷ Zvornik⁵¹⁸ and Ilidža⁵¹⁹ through June and July.⁵²⁰

172. In accordance with strategic objective 2, a northern corridor was established by the beginning of July 1992, for which MLADIĆ congratulated his troops for the "realisation of military and political goals".⁵²¹ By that time, **KARADŽIĆ** and the BSL were already considering whether they had conquered enough territory to consider relinquishing some in final negotiations.⁵²²

173. At an 8 November 1992 meeting held between the BSL and the VRS Corps Commanders, **KARADŽIĆ** praised "[t]he army and our courageous officers [who have] contributed enormously to the results that we have achieved to date."⁵²³ However, **KARADŽIĆ** went on to observe that "[m]aybe it would be good if we solved: the issue of the /River/ Drina". KRAJIŠNIK then reminded MLADIĆ that the VRS had failed to achieve, *inter alia*, the third strategic objective and stated: "The most important objective is the task assigned to ŽIVANOVIĆ—the [čišćenje—cleansing/mopping up] of the Drina. The most important task is separation from the Muslims."⁵²⁴

174. Days later, on 19 November 1992, MLADIĆ issued Directive 4, ordering the DK to "exhaust the enemy, inflict the heaviest possible losses on them and force them

⁵¹³ See e.g. SIC:A.15.2(Vlasenica).

⁵¹⁴ P1478,p.53. See also R.BRDANIN:T.43681-43682.

⁵¹⁵ [REDACTED]

⁵¹⁶ See also P1478,pp.54-56.

⁵¹⁷ See Brief,para.59.

⁵¹⁸ See Brief,para.58.

⁵¹⁹ See Brief,para.60.

⁵²⁰ See further III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.

⁵²¹ P5509,p.1.

⁵²² D92,p.19.

⁵²³ P1481,p.145.

⁵²⁴ P1481,pp.145-147.

to leave the Birač, Žepa and Goražde areas *with the Muslim population*.⁵²⁵ **KARADŽIĆ**'s approval of this criminal directive and efforts to ensure its implementation are detailed below.⁵²⁶

175. Following Directive 4 and culminating in the attack on Srebrenica in July 1995, a central BSL goal was to complete the cleansing of the Podrinje area.⁵²⁷ VRS attacks on Muslims in the Drina area in implementation of Directive 4 in late 1992 and early 1993 led to masses of displaced Muslims gathering in Srebrenica, an international outcry and the UNSC designation of Srebrenica as a safe area. In April 1993, **KARADŽIĆ** was forced by international pressure to order an end to operations against Srebrenica.⁵²⁸ While this initial wave of attacks was halted, from 1993 to 1995, the VRS, under **KARADŽIĆ**'s command, restricted aid to Srebrenica and other eastern enclaves, resulting in dire humanitarian conditions.⁵²⁹

176. During this period, the BSL's desire to rid Serb-coveted areas—including the eastern enclaves—of Muslims and Croats continued unabated. In April 1994, Bosnian Serb Forces attacked Goražde,⁵³⁰ with MLADIĆ ordering subordinate units to "[k]eep pushing energetically onwards [...] The Turks must disappear from these areas."⁵³¹ Though this attack was also halted following international intervention,⁵³² **KARADŽIĆ** praised the operation as "successfully and brilliantly implemented", noting more had been taken than planned.⁵³³

177. In July 1994, MLADIĆ reported that "we are on our way to [očistimo—cleanse/mop up] the enclaves",⁵³⁴ ordering, in relation to Srebrenica,⁵³⁵ that "[t]he enclave is not to survive but to disappear".⁵³⁶ He was, however, frustrated that the "Turks" in the Podrinje were protected through UN intervention, stating in August

⁵²⁵ P976,p.5(emphasis added).

⁵²⁶ See III.C.8.(i).(iii).b.iv: Directive 4.

⁵²⁷ See Podrinje Summary.

⁵²⁸ D43.

⁵²⁹ See Podrinje Summary.

⁵³⁰ This operation is more fully addressed in other parts of the brief. See III.C.8.(i).(iii).b: Directives. P1657; P1486,pp.10,14-15. See also P1662,p.3; P1646,p.5; P1663,p.3; A.BANBURY:P2451,para.13.

⁵³¹ P1645.

⁵³² A.BANBURY:T.13422-13423; P853; P1647,p.5. See also P829,p.2; P1486,pp.18-28; P4447; D.HARLAND:P820,paras.98-119; P1657; P851.

⁵³³ P1486,p.29.

⁵³⁴ P6482,p.2.

⁵³⁵ This is evident from the content of OGNJENović's subsequent report. P4075,p.3. See also P6482,p.6.

1994:

In Podrinje we thrashed the Turks. If the Americans and English, the Ukrainians and Canadians in Srebrenica, in the meantime it's the Dutch, would not protect them, they would have disappeared from this area long ago.⁵³⁷

178. BSL efforts to "clean"⁵³⁸ the eastern enclaves culminated in **KARADŽIĆ**'s March 1995 Directive 7.⁵³⁹ This openly criminal order, signed by **KARADŽIĆ**, instructed the DK "[b]y planned and well-thought-out combat operations" to "create an unbearable situation of total insecurity with no hope of further survival or life for the inhabitants of Srebrenica and Žepa".⁵⁴⁰ Directive 7 was implemented,⁵⁴¹ and the stage was set for even worse crimes against Srebrenica's civilians in July 1995.⁵⁴²

6. Pattern of crimes

179. As described in greater detail in the Municipality Summaries,⁵⁴³ the common criminal purpose was implemented in municipality after municipality, as Bosnian Serb civilian and military authorities waged a coordinated campaign of crimes against non-Serbs in order to permanently remove them from Serb-claimed areas.

180. Across the RS, Serb-claimed municipalities were taken over, often by initial shelling and infantry attacks directed against non-Serb parts of towns and villages, followed by a wave of "čišćenje" operations, during which many, sometimes hundreds of civilians were killed, homes were destroyed and civilians forced to flee.⁵⁴⁴ The combinations of forces carrying out these attacks varied depending on the circumstances. For example, paramilitaries, experienced from their involvement in the Croatian conflict, had a prominent role in early municipality attacks such as Bijeljina and Zvornik, where they cooperated with Serb TO and MUP forces. Later attacks—such as in Rogatica and Prijedor—were led by the newly-established VRS. In every

⁵³⁶ P6482,pp.5-6. *See also* P6482,p.6; P1486,p.178.

⁵³⁷ P4442; MLEŠIĆ:T.25030-25032.

⁵³⁸ *See e.g.* P988,p.68.

⁵³⁹ *See further* III.C.8.(i).(iii).b.vii: Directive 7.

⁵⁴⁰ P838,p.10.

⁵⁴¹ *See* Podrinje Summary.

⁵⁴² *See* V: Srebrenica.

⁵⁴³ *See* Municipality Summaries.

municipality, however, CSs—formed pursuant to the instructions of **KARADŽIĆ** and the BSL—played a central role in coordinating and facilitating municipality takeovers and the accompanying crimes.

181. From the ARK to the Drina to the Sarajevo area, thousands of Bosnian Muslims and Croats were forcibly removed from Serb-claimed territory.⁵⁴⁵ Expulsion operations were regularly accompanied by killings, beatings and, in many instances, sexual violence.⁵⁴⁶ Men were often separated and executed.⁵⁴⁷

182. Thousands more non-Serb civilians were violently removed from their homes, rounded up and arbitrarily detained in factories, schools, police stations, prisons and other facilities commandeered by Bosnian Serb authorities.⁵⁴⁸ Detainees were held in horrific conditions across this network of official and unofficial detention facilities. All suffered, to a greater or lesser degree, from the effects of overcrowding, unsanitary conditions, and a severe shortage of shelter, food, water and medical facilities.⁵⁴⁹ They were systematically subjected to interrogations, mistreatment, torture, sexual violence and rape, resulting in serious bodily and mental harm.⁵⁵⁰ Many detainees died as a result of the mistreatment, unhygienic conditions and lack of medical facilities.⁵⁵¹ Large numbers were used as human shields or for forced labour (including recovering and disposing of bodies, clearing rubble, carrying ammunition, making sniper nests, and digging trenches at frontlines), often resulting in their

⁵⁴⁴ See Bijeljina, Zvornik, Bratunac, Prijedor, Rogatica, Sanski Most, Sokolac, Vlasenica, Vogošća, Bosanski Novi, Foča, Ključ, Novi Grad Summaries; SIC:A.1.1-A.16.3(Bijeljina; Bratunac; Foča; Ključ; Novi Grad; Prijedor; Sanski Most; Sokolac; Višegrad; Vlasenica; Zvornik).

⁵⁴⁵ See Municipality Summaries.

⁵⁴⁶ See e.g. Bijeljina, Bosanski Novi, Bratunac, Rogatica, Prijedor, Sokolac, Vlasenica, Zvornik, Foča Summaries.

⁵⁴⁷ See e.g. Bratunac, Prijedor, Sokolac, Zvornik Summaries; SIC:A.3.2,A.5.4,A.10.4,A.10.7, A.12.1,A.12.3,A.13.1,A.14.2,A.15.1,A.16.3(Bratunac; Foča; Prijedor; Sanski Most; Sokolac; Višegrad; Vlasenica; Zvornik).

⁵⁴⁸ See e.g. SIC:C.1.2-C.27.7(Banja Luka; Bijeljina; Bosanski Novi; Bratunac; Brčko; Foča; Hadžići; Ilidža; Ključ; Novi Grad; Novo Sarajevo; Pale; Prijedor; Rogatica; Sanski Most; Sokolac; Vlasenica; Vogošća; Zvornik).

⁵⁴⁹ See e.g. SIC:C.1.2-C.27.7(Banja Luka; Bijeljina; Bosanski Novi; Bratunac; Brčko; Foča; Hadžići; Ilidža; Ključ; Novi Grad; Novo Sarajevo; Pale; Prijedor; Rogatica; Sanski Most; Sokolac; Vlasenica; Vogošća; Zvornik). See also Prijedor, Banja Luka Summaries; III.C.8.(c): Exchange Commission.

⁵⁵⁰ See e.g. SIC:C.1.2-C.27.7(Banja Luka; Bijeljina; Bosanski Novi; Bratunac; Brčko; Foča; Hadžići; Ilidža; Ključ; Novi Grad; Novo Sarajevo; Pale; Prijedor; Rogatica; Sanski Most; Sokolac; Vlasenica; Vogošća; Zvornik). See also Prijedor, Banja Luka, Foča, Ilidža, Pale Summaries.

⁵⁵¹ See e.g. SIC:B.1.1,B.1.3,B.1.4,B.2.1,B.14.1,B.15.2,B.15.5,B.18.1, C.1.2,C.2.1,C.4.1,C.10.1,C.19.2,C.20.2,C.20.3,C.20.4,C.21.3,C.22.1,C.22.4,C.27.2(Banja Luka; Bijeljina; Bosanski Novi; Foča; Pale; Prijedor; Rogatica; Sanski Most; Vlasenica; Zvornik). See also Prijedor, Banja Luka Summaries.

deaths.⁵⁵² Hundreds of detainees were summarily executed.⁵⁵³

183. Detainees were regularly transferred between detention facilities.⁵⁵⁴ Those who survived the camps were generally expelled—often under the guise of an "exchange"—from Serb-held territory,⁵⁵⁵ a practice which continued throughout the Indictment period.⁵⁵⁶

184. Non-Serbs were subjected to wide-ranging restrictive and discriminatory measures to compel them to leave, including the denial of freedom of movement,⁵⁵⁷ dismissals,⁵⁵⁸ and forced labour.⁵⁵⁹ In many municipalities non-Serbs were forced to sign documents turning over their property to the Serb authorities,⁵⁶⁰ ensuring that they would not return. Serb Forces and paramilitaries also set fire to non-Serb homes and businesses and appropriated valuable property from fleeing non-Serbs,⁵⁶¹ which the RS Government sought to collect, deciding that "[m]aterial assets and money seized from war profiteers and money earned in unlawful and illegal ways is to be

⁵⁵² See e.g. SIC:B.5.1,B.13.3,B.19.1,C.1.2,C.2.1,C.4.1,C.7.2,C.18.1,C.18.2,C.20.4,C.21.1,C.21.3, C.25.2, C.25.3, C.26.3, C.27.4 (Banja Luka; Bijeljina; Bosanski Novi; Brčko; Novo Sarajevo; Prijedor; Rogatica; Vlasenica; Vogošća; Zvornik); Ilidža, Novo Sarajevo Summaries.

⁵⁵³ See e.g. Prijedor, Foča, Novi Grad, Rogatica Summaries; SIC:A.10.7,A.10.8,A.16.3(Prijedor; Zvornik); SIC:B.4.1,B.8.1,B.12.2,B.15.1-B.15.5,B.16.2,B.17.1,B.18.2,B.18.4,B.20.1-B.20.4,C.20.6(Bratunac; Foča; Novi Grad; Prijedor; Rogatica; Sanski Most; Vlasenica; Zvornik).

⁵⁵⁴ See e.g. AF788; AF793; AF2251; AF585; AF589; AF2357; AF2646; AF2642; AF1172; AF2683; AF2748; [REDACTED]; [REDACTED]; P5468; P3327; D470,pp.8,16; P3719; [REDACTED]; AF629; I.OSMANOVIĆ:P3212,paras.146,153-154; I.OSMANOVIĆ:T.17947; M.KURALIĆ:P63,p.20; M.KURALIĆ:P84,pp.6-7; E.PAŠIĆ:P59,pp.33-35; S.EGRLIĆ:T.19980; KDZ010:P416,p.36; T.GLAVAŠ:P2296,para.50; M.MUSIĆ:P2403,paras.65-71,91-117,123-129; Z.OKIĆ:P124,pp.5-7; M.TOLJ:T.34644-34646; M.SMAJŠ:P43,pp.5,10; H.KARIĆ:P2839,paras.44-46; P3208; J.ŠARAC:D4368,para.41; P2772; K.MEŠANOVIĆ:P3528,para.58; [REDACTED]; P5555,p.4; P2968,p.5; [REDACTED]; KDZ038:P676,p.28; Š.HURKO:T.18233-18234,18245; M.KARABEG:P3303,pp.96-99,117; [REDACTED]; A.ZULIĆ:P718,paras.86-94; [REDACTED]; R.BEGIĆ:P692,pp.6-7,21; J.AVDISPAHIĆ:P70,p.23; P5531; A.DŽAFIĆ:P3488,para.148; A.EGRLIĆ,P6586,pp.160-162,305,309.

⁵⁵⁵ See e.g. **Banja Luka:** [REDACTED]; P3725; D1876,p.1; R.RADINKOVIĆ:D4204,para.48; [REDACTED]; F.BISČEVIĆ:P135,pp.84-85;

Bijeljina: I.OSMANOVIĆ:P3212,paras.60,145,180; E.PAŠIĆ:P59,pp.28,33-35,42;

Ilidža: [REDACTED]; S.ŠKILJEVIĆ:T.36931-36932; **Prijedor:** AF1296-AF1297; [REDACTED]; P2072; KDZ054:P684,p.8; D3110; **Rogatica:** P6106; J.BOWEN:P2068,para.53; E.PAŠIĆ:P59,pp.31-35; A.ISAKOVIĆ:P128,p.4; **Sanski Most:** [REDACTED]; P3329,pp.32-33.

⁵⁵⁶ See e.g. P4867,p.3.

⁵⁵⁷ See e.g. Foča, Ključ, Prijedor, Pale, Vlasenica Summaries.

⁵⁵⁸ See e.g. Bijeljina, Foča, Ključ, Prijedor, Pale, Sanski Most, Sokolac, Vlasenica, Zvornik Summaries. See also III.C.8.(g).(v): CSs imposed restrictive and discriminatory measures.

⁵⁵⁹ See e.g. Bijeljina, Sanski Most, Sokolac Summaries.

⁵⁶⁰ See e.g. Bosanski Novi, Ključ, Pale, Sanski Most, Vlasenica, Vogošća, Zvornik Summaries.

⁵⁶¹ See e.g. Bijeljina, Foča, Ključ, Novo Sarajevo Summaries.

placed under the control of the state and used for the defence of the Republic."⁵⁶² Abandoned homes, businesses and "war booty" were also allocated to Serbs.⁵⁶³

185. During and after the takeovers, Serb Forces deliberately destroyed cultural monuments and sacred sites,⁵⁶⁴ to send a signal to non-Serbs to leave, and to ensure they did not return.⁵⁶⁵ Roman Catholic and Islamic religious heritage sites were "singled out for destruction".⁵⁶⁶ Minarets, which were "the most visible symbol of the Muslim community's presence in a locality", were "favourite targets".⁵⁶⁷ In MLADIĆ's own words: "we cannot allow leaving the mosques with two minarets there [...] And we have to sort it out, because of our children who have perished, to teach them never to encroach our daughters, sisters, brothers and mothers."⁵⁶⁸ In many localities, mosques and churches were not only destroyed, but the ruins razed, the sites levelled and desecrated, or the rubble deposited in garbage dumps.⁵⁶⁹

186. The pattern of these crimes reflects the organisation, preparation and planning that preceded them, and reveals the common purpose behind them. Batković⁵⁷⁰ and Kula⁵⁷¹ prisons, for example, held detainees from municipalities across BiH. Wardens from camps in practically every municipality met to discuss common issues.⁵⁷²

Takeover, persecution, round-ups, detention, expulsions, killings and destruction of cultural property did not occur in only one municipality, but in one after another in the areas sought by the BSL. These crimes "could not have happened spontaneously in such an identical way everywhere".⁵⁷⁴ This factor alone—without more—reveals a guiding hand and a common purpose.

⁵⁶² P3129,p.4. *See also* P3141,p.12.

⁵⁶³ *See e.g.* Bijeljina, Bratunac, Hadžići, Iliđža, Novi Grad, Pale, Prijedor Summaries.

⁵⁶⁴ SIC:D.2-D.22(Bijeljina; Bosanski Novi; Bratunac; Foča; Ključ; Novi Grad; Pale; Prijedor; Rogatica; Sanski Most; Sokolac; Vogošća; Zvornik). *See also* A.RIEDLMAYER:P4069; Foča, Ključ, Rogatica, Sanski Most, Sokolac Summaries; A.RIEDLMAYER:P4068,paras.32,34; A.RIEDLMAYER:T.22536-22540.

⁵⁶⁵ P.RADIĆ:P1,p.105; M.TUPAJIĆ:P5238,p.109; [REDACTED].

⁵⁶⁶ A.RIEDLMAYER:P4068,paras.21,26,30-31,44. *See also* A.RIEDLMAYER:T.22550-22551.

⁵⁶⁷ A.RIEDLMAYER:P4068,para.31.

⁵⁶⁸ P1379,p.72.

⁵⁶⁹ *See e.g.* A.RIEDLMAYER:P4068,paras.40-42,46-47,49;

A.RIEDLMAYER:P4069,records.5,8,29,98,113,133,148-149,248,376; A.RIEDLMAYER:T.22545-22548; Sokolac Summary; SIC:D.20(Sokolac).

⁵⁷⁰ *See e.g.* P3213; AF2748.

⁵⁷¹ *See* Iliđža Summary; SIC:C.18.2.

⁵⁷² KDZ239:P3336,pp.98-99.

⁵⁷³ [REDACTED]

⁵⁷⁴ M.DAVIDOVIĆ:T.15536. *See also* [REDACTED].

7. The Defence unsuccessfully challenged evidence of the implementation of the common criminal purpose

187. The Defence attempted to distance **KARADŽIĆ** from these crimes and events, arguing that municipal takeovers were spontaneous local clashes resulting from an ethnically tense environment.⁵⁷⁵ This claim is undermined by the evidence of the hierarchical nature of the SDS and its insistence on discipline,⁵⁷⁶ the extensive, centrally-coordinated preparation for the takeovers by **KARADŽIĆ** and the BSL,⁵⁷⁷ and the BSL's clearly stated position on ethnic separation.⁵⁷⁸

188. That local actions followed BSL policy is further evidenced by local echoes of republic-level rationales and policies. Thus, for example, Bratunac's Muslims were told by the SDS that no co-existence was possible;⁵⁷⁹ **DERONJIĆ** threatened that if they did not agree to divide the police, they would disappear.⁵⁸⁰ [REDACTED]

[REDACTED] Ključ CS President Jovo **BANJAC** stated publicly that: "I think that life has to be totally ethnically demarcated and the areas ethnically cleansed of all those who cannot live together in this area".⁵⁸² After Zvornik had been wiped clean of Muslims, Municipal President Branko **GRUJIĆ** declared, "we are [...] reclaiming this as Serbian land forever and ever" and responded to the BiH government's claims to Zvornik with incredulity: "Return to Zvornik? [...] The Muslims must be joking. This was a Serbian town before Islam existed in the Balkans."⁵⁸³ Rogatica Municipal President Tomislav **BATINIĆ** declared that Serbs and Muslims could not live together and Serbs wanted to "create a Serbian state, once and for all".⁵⁸⁴ Bosanska Krupa CS President Gojko

⁵⁷⁵ See e.g. D.RAĐETIĆ:D4226,paras.14,16-17; M.KVOČKA:T.45624,45631-45632,45640-45644; R.DUKANOVIĆ:D3194,para.39; M.UJIĆ:D2909,para.24; M.UJIĆ:T.33458-33461; R.PAŠIĆ:D3849,para.11.

⁵⁷⁶ See III.C.8.(a).(ii): **KARADŽIĆ**'s authority over the SDS.

⁵⁷⁷ See III.C.1: Preparations to create a Serb-dominated state within Bosnia; III.C.2: Variant A/B; Municipality Summaries.

⁵⁷⁸ See III.B.1: The goal of ethnic separation.

⁵⁷⁹ Dž.GUŠIĆ:P3196,paras.14-15.

⁵⁸⁰ Dž.GUŠIĆ:P3196,paras.31-32.

⁵⁸¹ [REDACTED]

⁵⁸² P6552,p.2.

⁵⁸³ P6417. **GRUJIĆ** resiled from the latter quote from this *New York Times* report. However, in addition to his generally-low credibility (see DCC(B.GRUJIĆ)), his denial was confused and contradictory. B.GRUJIĆ:T.40432. See also KDZ072:P425,pp.14-15; [REDACTED]; KDZ051:T.19415.

⁵⁸⁴ P3409.

KLICKOVIĆ stated publicly that "there is not even a possibility of coexistence and let alone us living together" with Muslims.⁵⁸⁵ Prijedor CS member and Trnopolje camp commander Slobodan KURUZOVIĆ explained that the Serb plan was to reduce the number of Muslims in Prijedor to 10 per cent or less, and then later to reduce this to 2 per cent or less.⁵⁸⁶

189. The Defence also attempted to show a broader pattern of proper treatment of non-Serbs in the RS, by bringing evidence from some non-Indictment municipalities. However, Defence witnesses from these municipalities only served to bolster the evidence of an organised pattern of events and crimes:

- Trebinje CS President Božidar VUČUREVIĆ confirmed that the CS replaced Trebinje's municipal government,⁵⁸⁷ an armed group of Serbs began intimidating Muslims and Croats,⁵⁸⁸ Trebinje's mosques were destroyed by the army,⁵⁸⁹ and that he told Trebinje's Muslims that he was unable to guarantee their safety and then organized their mass departure out of BiH.⁵⁹⁰
- Čelinac CS President Sveto KOVAČEVIĆ claimed "protection" was the justification for the "special status" his CS gave to non-Serbs, which deprived them of basic rights in the municipality,⁵⁹¹ despite agreeing that Čelinac's non-Serbs posed no security threat to its Serbs.⁵⁹² He confirmed houses were set on fire in Muslim-majority settlements,⁵⁹³ and that Serbs who had killed Muslims⁵⁹⁴ were arrested but released before trial.⁵⁹⁵ He agreed that Muslims left Čelinac, but claimed that this was for "schooling" and other reasons including "natural selection".⁵⁹⁶
- Srbac, with over 95% Serbs, did not face the same alleged threats from non-Serbs. As **KARADŽIĆ** himself told the Srbac authorities, if Srbac's 21,000

⁵⁸⁵ P6665; G.KLICKOVIĆ:T.46875-46877.

⁵⁸⁶ AF1093. *See also* I.MERDŽANIĆ:P3881,pp.76,107(confidential).

⁵⁸⁷ B.VUČUREVIĆ:T.35941.

⁵⁸⁸ B.VUČUREVIĆ:T.36014-36015.

⁵⁸⁹ [REDACTED]; B.VUČUREVIĆ:T.36015.

⁵⁹⁰ B.VUČUREVIĆ:T.35942,35964,35969.

⁵⁹¹ S.KOVAČEVIĆ:T.45123-45130; P2638.

⁵⁹² S.KOVAČEVIĆ:T.45142.

⁵⁹³ S.KOVAČEVIĆ:T.45142.

⁵⁹⁴ S.KOVAČEVIĆ:T.45142-45144; P6577.

⁵⁹⁵ S.KOVAČEVIĆ:T.45147.

⁵⁹⁶ S.KOVAČEVIĆ:T.45138-45139.

Serbs were bothered by its 1,000 non-Serbs, "you are mere cunts".⁵⁹⁷ Nevertheless, Srbac municipal president Miloš MILINČIĆ confirmed that the municipal authorities set up a CS under ARK order,⁵⁹⁸ and failed to punish a Serb known to have killed Muslims.⁵⁹⁹ While Srbac, with its overwhelming majority of Serbs, was relatively peaceful,⁶⁰⁰ MILINČIĆ testified that he could not avoid hearing about the killings, violence, and dismissals to which non-Serbs elsewhere in BiH were subjected.⁶⁰¹

- In Bosanska Krupa, CS President Gojko KLIČKOVIĆ ordered the removal of Muslims from Serb-claimed parts of the municipality⁶⁰² and admitted that he had stated, and believed, that "the River Una is the border of the Serbian State".⁶⁰³

190. Defence claims that there were no takeovers of Serb-majority municipalities because the Serbs were already in power⁶⁰⁴ are a semantic distortion which ignores the obvious distinction between political control in a multi-ethnic system and establishing mono-ethnic control.⁶⁰⁵

191. Moreover, Defence witness denials that takeovers occurred were patently false. For example, Ključ CS member Rajko KALABIĆ's claim that power was not seized in Ključ, there was no significant army presence there, and "nothing special" was noticed there until 27 May 1992⁶⁰⁶ was contradicted by a 6th Brigade report stating that from 7-10 May, multiple army and police units participated in the takeover,⁶⁰⁷ and an 8 May announcement from his own CS regarding an increased presence of armed forces on the territory of the municipality.⁶⁰⁸

192. Defence witness attempts to justify attacks on non-Serb areas where inhabitants had allegedly failed to surrender their weapons revealed that these were

⁵⁹⁷ M.MILINČIĆ:T.44947.

⁵⁹⁸ M.MILINČIĆ:T.44987-44988.

⁵⁹⁹ M.MILINČIĆ:P6564,pp.140-141; M.MILINČIĆ:T.44966-44967.

⁶⁰⁰ M.MILINČIĆ:P6564,pp.138,160.

⁶⁰¹ M.MILINČIĆ:P6564,pp.114-116; M.MILINČIĆ:T.44982-44985.

⁶⁰² P2737; P6664.

⁶⁰³ P6665; G.KLIČKOVIĆ:T.46874-46877.

⁶⁰⁴ See e.g. M.KRAJIŠNIK:T.43274.

⁶⁰⁵ For example, Milivoje KIĆANOVIĆ, who claimed there was no Serb takeover in Bijeljina, had no explanation for contemporaneous reflections of a transformation to Serbian rule in Bijeljina. M.KIĆANOVIĆ:T.34884-34886; P956,p.22; P2629.

⁶⁰⁶ R.KALABIĆ:T.44565-44567; R.KALABIĆ:D4169,para.6.

⁶⁰⁷ P3663,p.5.

⁶⁰⁸ P3497.

indiscriminate attacks and collective punishment. Sanski Most authorities broadcast warnings to non-Serbs that, "[a]s long as one of you has a weapon, you risk the destruction of your houses and families."⁶⁰⁹ Similarly, Mile UJIĆ agreed that the shelling of two Rogatica villages forced the inhabitants to flee and leave behind a number of wounded children, but claimed: "The point of our offer was: You hand over your weapons, you live peacefully and normally. If there's fire coming from a village, it's not a village anymore, it's a military target, a legitimate military target".⁶¹⁰

193. Other Defence witnesses simply conceded the criminality of scheduled killing incidents. For example: KUPREŠANIN confirmed the VRS mass killing of unarmed Croats in Briševo village in Prijedor, in which there was "no combat";⁶¹¹ KALABIĆ accepted his previous testimony that unarmed people were killed in Velagići, which was "the most appalling war crime";⁶¹² Rogatica CS member Mile UJIĆ confirmed that a VRS commander had unarmed detainees from Rasadnik shot on 15 August;⁶¹³ and Milovan BJELICA affirmed that "44 Muslim civilians were massacred" in Novoseoci, Sokolac in September 1992.⁶¹⁴

194. Defence witness claims that camp detainees were combatants or prisoners of war⁶¹⁵ were also demonstrably false, contradicted by a wealth of evidence including contemporaneous acknowledgments by RS authorities such as:

- STANIŠIĆ's 17 July 1992 report to **KARADŽIĆ** and the Prime Minister on work to date, stating that "[t]he Army, crisis staffs and war presidencies have requested that the Army round up or capture as many Muslim civilians as possible, and they leave such undefined camps to internal affairs organs."⁶¹⁶
- ŽUPLJANIN's 20 July 1992 letter to STANIŠIĆ describing the detention by

⁶⁰⁹ P725,p.7.

⁶¹⁰ M.UJIĆ:T.33466-33467.

⁶¹¹ SIC:A.10.9(Prijedor); V.KUPREŠANIN:T.43531-43532,43575.

⁶¹² SIC:B.10.1(Ključ); R.KALABIĆ:T.44586-44587.

⁶¹³ SIC:B.16.2(Rogatica); M.UJIĆ:T.33470-33476.

⁶¹⁴ SIC:A.13.1(Sokolac); M.BJELICA:D3206,para.57. *See also* D.OBRADOVIĆ:D3175,para.20; D.OBRADOVIĆ:T.36093-36094.

⁶¹⁵ *See e.g.* S.BOJANOVIĆ:T.34854-34855; S.ŠKILJEVIĆ:D3331,para.7; M.DOBRIJEVIĆ:T.44627,44638-44639; R.RADINKOVIĆ:D4204,paras.34-35; S.VESELINOVIĆ:T.45107-45108; M.LELEK:D3031,para.19; M.LELEK:T.34412-34413,34419-34420,34426; G.ČEKIĆ:D3236,para.19; M.RAŠEVIĆ:D4307,para.43; M.UJIĆ:T.33470-33474; D.KERSEROVIĆ:T.41990.

⁶¹⁶ P1096,p.3.

the VRS and MUP in the ARK of "adult men for whom the service had found no information of security interest to date, which is why these men can be treated as hostages". These "hostages" included minors, men over 60, men with chronic illnesses and the disabled.⁶¹⁷

- A 4 June 1992 Sanski Most CS order to send to Manjača Camp people including politicians, "nationalist extremists" and "people unwelcome in Sanski Most municipality".⁶¹⁸
- An August 1992 Prijedor SJB report acknowledging that, in addition to persons suspected of organising, participating, assisting and financing armed rebellion, Omarska also housed persons "who were not interesting from a security point of view but who were captured because they found themselves in combat zones".⁶¹⁹
- [REDACTED]
- [REDACTED]
- An October 1994 order in which TOLIMIR noted in respect of exchanges with the BiH authorities "we receive captured soldiers of the Republic Srpska while we mostly give them civilians".⁶²²

195. Moreover, the Defence's own witnesses admitted that RS authorities detained civilians in [REDACTED] Bijeljina,⁶²⁴ Iliđža (Kula),⁶²⁵ Rogatica,⁶²⁶ Sanski

⁶¹⁷ P1097.

⁶¹⁸ P2639.

⁶¹⁹ D470,p.30.

⁶²⁰

⁶²¹

[REDACTED] See also P3491; [REDACTED]

⁶²² P2684,p.1. See also V.LUKIĆ:T.38813. See also A.MAŠOVIĆ: [REDACTED].

⁶²³

⁶²⁴ S.BOJANOVIĆ:T.34853-34855.

Most,⁶²⁷ Novi Grad,⁶²⁸ Prijedor⁶²⁹ and indeed throughout the RS.⁶³⁰ SUBOTIĆ acknowledged that the "important, complex and delicate" problem facing the BSL in mid-June⁶³¹ related to the detention of civilians in the RS.⁶³²

196. Some Defence witnesses claimed that people were "sheltered" in the camps for their own protection, often voluntarily.⁶³³ This claim is belied by the wealth of evidence from the very people who were confined who described their own forcible detention and the systematic mistreatment, abuse, and killings to which detainees were subjected at the camps.⁶³⁴ Multiple Defence witnesses who asserted this subsequently retracted this claim,⁶³⁵ and one "regret[ted]" that civilians were detained at Trnopolje, describing it as "really sad".⁶³⁶

197. Equally, Defence witness contentions that deprivations at the camps were due to wartime circumstances rather than a genocidal or persecutory policy⁶³⁷ do not stand up to scrutiny in light of the appalling conditions to which detainees were subjected in a context of systematic brutality and mistreatment.⁶³⁸ Moreover, at camps where

⁶²⁵ [REDACTED]; S.ŠKILJEVIĆ:T.36931-36932.

⁶²⁶ See e.g. T.BATINIĆ:T.33683-33684; S.VESELINOVIĆ:T.45107-45108.

⁶²⁷ M.DOBRIJEVIĆ:T.44637,44640; [REDACTED].

⁶²⁸ S.DŽINO:T.29857-29858. Note that DŽINO attempted to backtrack from this admission the next day, claiming the questions "confused" him and his answers would "be better today than yesterday". S.DŽINO:T.29870-29871.

⁶²⁹ KW609:T.46129-46130; KW609:D4246,pp.41-42,77. See also D3968; D470,p.30; P3491; P3721.

⁶³⁰ V.LUKIĆ:T.38812-38813.

⁶³¹ P1095,p.4.

⁶³² B.SUBOTIĆ:T.40118.

⁶³³ See e.g. R.RADINKOVIĆ:D4204,para.39; [REDACTED]; [REDACTED]; B.MANDIĆ:T.45764; B.MANDIĆ:D4229,para.10; S.ČELIKOVIĆ:D2922,paras.26-27; S.ČELIKOVIĆ:T.33564-33565; Z.JOVANOVIĆ:D3007,para.29; M.VUJIČIĆ:D2767,para.33; M.VUJIČIĆ:T.32095-32097; V.BANDUKA:D2915,paras.54-56; N.SAMOUKOVIĆ:D3062,para.18; M.TOLJ:D3063,para.9; S.PUHALIĆ:D4008,paras.6-7,19; Č.ŠIPOVAC:D4230,para.15; D.ĐENADIJA:D4882,para.6; M.UJIĆ:D2909,paras.27,41; M.UJIĆ:T.33461-33464,33476-33477; M.LELEK:T.34384-34385,34428-34429.

⁶³⁴ See e.g. A.DŽAFIĆ:P3488,paras.96-99; [REDACTED]; A.BALIĆ:P161,pp.1-2; M.MUSIĆ:P2403,paras.51,57-62,64,113-117; Z.OKIĆ:P125,p.1; Z.OKIĆ:P124,p.5; [REDACTED]; KDZ051:T.19397,19403-19405,19409-19411; E.PAŠIĆ:P59,pp.24-28; A.ISAKOVIĆ:P127,p.4. See also KDZ239:T.18984. See also Banja Luka, Hadžići, Prijedor, Rogatica Summaries; SIC:C.1.2;C.11.2;C.20.4;C.21.1;C.22.2;C.22.3;C.25.3(Banja Luka; Hadžići; Prijedor; Rogatica; Sanski Most; Vlasenica).

⁶³⁵ See e.g. B.MANDIĆ:T.45765-45766; S.PUHALIĆ:T.43426-43427; N.SAMOUKOVIĆ:T.34613; M.TOLJ:T.34636-34637.

⁶³⁶ M.STAKIĆ:T.45238-45239.

⁶³⁷ See e.g. M.GRUBAN:D4388,paras.8,23; M.GRUBAN:T.47490; R.RADINKOVIĆ:D4204,para.38; M.RAŠEVIĆ:D4307,paras.17-20; M.RAŠEVIĆ:T.46757-46759,46794-46795,46809-46810; M.KRNOJELAC:D2716,pp.121-127,549-554,568-569.

⁶³⁸ See e.g. SIC:C.1.2-27.7.

Serbs were also held, the differential treatment of Serbs and non-Serbs evidences a deliberate discriminatory policy.⁶³⁹

198. Multiple Defence witnesses, many of whom were members of the authorities responsible for the expulsions, asserted that non-Serbs voluntarily left their municipalities.⁶⁴⁰ This often reflected nothing more than the fact that non-Serbs sought or indeed sometimes begged to leave municipalities in which their lives were at risk.⁶⁴¹ Departure in the face of systematic killings, abuse and persecution does not constitute voluntary departure. In the words of one Muslim expelled from Kozluk in Zvornik, "[w]e faced only two options: to flee or to stay and be killed."⁶⁴²

199. Moreover, the claim is contradicted by a wealth of contemporaneous documentation and witness testimony evidencing the non-voluntary nature of the non-Serbs' departure.⁶⁴³ In the ARK for example, one 1KK report—noting the "dissatisfaction" of Muslim conscripts with the "massive destruction of their towns"—observed that SDS ARK leaders publicly advocated expelling "all Muslims and Croats".⁶⁴⁴ Despite the persecution, many non-Serbs resisted expulsion efforts. Another 1KK report noted that "the attempt to expel [Muslims and Croats] to Central Bosnia failed because of transportation difficulties and their resistance to leaving their places /of residence/."⁶⁴⁵ 1KK Commander TALIĆ considered that "the municipal and regional authorities should work much harder" at the departure of Croatian and Muslim population.⁶⁴⁶

200. Some contemporaneous efforts to maintain a veneer of voluntariness, nevertheless laid bare the forcible nature of the expulsions. The Sanski Most CS, for example, noting that there were 18,000 Muslims and Croats in the municipality,

⁶³⁹ See e.g. SIC:C10.1(Foča); P6283,p.4

⁶⁴⁰ See e.g. V.NIKOLIĆ:D4214,paras.17,24; R.PAŠIĆ:T.41047-41049; ██████████; M.VUJIČIĆ:D2767,paras.8,16,30,32; M.VUJIČIĆ:T.32142; V.BANDUKA:D2915,paras.81,85; M.TOLJ:D3063,paras.9,10,12; S.MIJANOVIĆ:D2773,para.6; Z.ČVORO:D2530,paras.5-6; Z.ČVORO:T.30939; T.HRŠUM:D2850,para.22; T.HRŠUM:T.32919-32920,32927; M.UJIĆ:D2909,paras.27,41; M.UJIĆ:T.33461-33464,33476-33477; D.OBRADOVIĆ:D3175,para.19; D.OBRADOVIĆ:T.36083,36109.

⁶⁴¹ Defence demographics expert Stevo PAŠALIĆ characterised the situation where people abandon their property to flee to safety as "voluntary migration". T.35402-35406.

⁶⁴² P2887,p.2. See also M.DAVIDOVIĆ:T.15535-15536.

⁶⁴³ See e.g. ARK:P3662,p.2; P3664,p.3; Ključ:P2606,pp.3,14,15; P2972,p.1; Sanski Most:P725,pp.2,7; V.NIKOLIĆ:T.45468; P3657,pp.4,8; Pale:S.CRNČALO:P733,paras.69,76; S.CRNČALO:T.1262; Hadžići:T.GLAVAŠ:P2296,para.82.

⁶⁴⁴ P3662,p.2. See also P6552,p.2.

⁶⁴⁵ P3664,p.3.

declared that "in order to avoid danger to the Serbian people it is necessary to organise their voluntary resettlement".⁶⁴⁷

201. In any event, multiple Defence witnesses acknowledged the widespread forcible expulsions of non-Serbs. Ronald HATCHETT stated ethnic cleansing by all parties was "obvious to anyone", including Serb cleansing of Muslims and Croats.⁶⁴⁸ Referring to Prijedor's Muslims, Milimir STAKIĆ admitted, "[i]t is a fact that crimes were committed. It is a fact that they were expelled from their homes and thereby compelled to leave the area."⁶⁴⁹ Milos MILINČIĆ from Srbac acknowledged as "facts" "the reduction of the Muslim population in Bosnia and Herzegovina [...] through massive forcible expulsions".⁶⁵⁰ [REDACTED]

202. **KARADŽIĆ** elicited evidence that some non-Serbs remained in the charged municipalities throughout the conflict, and that "loyal" villages remained untouched by Serb Forces.⁶⁵² In many instances, this evidence did not stand up to scrutiny.⁶⁵³ For example, KALABIĆ's claim that weapons were not collected in certain specific villages which did not join the Muslim paramilitaries⁶⁵⁴ is undermined by the Defence's own evidence that inhabitants of those same villages surrendered their

⁶⁴⁶ P3658,p.1.

⁶⁴⁷ P3851.

⁶⁴⁸ R.HATCHETT:T.31942.

⁶⁴⁹ M.STAKIĆ:T.45268-45269.

⁶⁵⁰ M.MILINČIĆ:P6564,pp.120-122; M.MILINČIĆ:T.44988-44989.

⁶⁵¹ [REDACTED]

⁶⁵² See e.g. B.GRUBAN:D4388,para.2; D.JANKOVIĆ:T.47297-47298; B.MANDIĆ:T.45812; T.BATINIĆ:D2930,paras.27,29-30; T.BATINIĆ:T.33690.

⁶⁵³ See e.g. B.GRUBAN:D4388,para.2. *But see* B.GRUBAN:T.47449 and P6684,pp.3-4, limiting this statement to his local commune—in which there were 5 Croats and no Muslims—and surrounding communes. JANKOVIĆ listed Muslim villages which were untouched in Prijedor (D.JANKOVIĆ:T.47297-47298), but when confronted with P3852, detailing villages fully and partially destroyed due to armed conflict, JANKOVIĆ admitted he had not been to any of the villages he claimed were untouched and based his testimony on "stories" that circulated. D.JANKOVIĆ:T.47349-47350. When put to BATINIĆ that the remaining Muslims from Rogatica villages were in fact expelled in October 1994, he agreed they left and eventually conceded they were living "in fear daily". T.BATINIĆ:T.33691-33695. OBRADOVIĆ claimed that Muslims from Vrhbarje, Sokolac, remained there until October 1994, when they requested to leave, then "got into their cars and [...] simply left", "of their own free will". D.OBRADOVIĆ:D3175,para.19; D.OBRADOVIĆ:T.36083,36109.

Confronted with his own report that Muslim civilians "were handed over to the Kula KP Dom" by Sokolac policemen, OBRADOVIĆ admitted they were taken to Kula by bus, but refused to confirm the involvement of Sokolac police. D.OBRADOVIĆ:T.36110-36111; D3169.

⁶⁵⁴ R.KALABIĆ:D4169,para.10.

weapons to the CS.⁶⁵⁵ Moreover, despite these villages' submission to the Serb authorities, a defence exhibit demonstrates that by February 1993, all 4,516 residents of these villages had left the area.⁶⁵⁶

203. In any event, the fact that a remnant of the non-Serb population remained in certain municipalities does not assist **KARADŽIĆ**. As described above, the common purpose he shared was to permanently remove the non-Serb population to such a level that Serbs would not be "overwhelm[ed]" by the Muslim birth rate and the non-Serb population.⁶⁵⁷ While this required a drastic reduction of the non-Serb population in the charged municipalities, it did not require the expulsion of every last non-Serb from the claimed territory. Moreover, it was in **KARADŽIĆ**'s interest to retain a token Muslim and Croat presence in light of international pressures. **KARADŽIĆ** reminded the Assembly in August 1992 that some percentage of non-Serbs was politically useful.⁶⁵⁸ Equally, it was sometimes in the local authorities' interest to retain a small number of non-Serbs: the Sanski Most authorities, for example, retained about 5,000 non-Serbs throughout the war for forced labour and exchange.⁶⁵⁹

204. Multiple Defence witnesses claimed that crimes were the acts of rogues and criminals, condemned by the authorities and the BSL.⁶⁶⁰ This factually incorrect claim ignores that the civilian authorities, police, TO and army, all of whom were subordinated to **KARADŽIĆ**, committed the vast majority of crimes.⁶⁶¹ To the extent that paramilitaries were involved in the crimes, they worked in close cooperation with **KARADŽIĆ** and/or other JCE members.⁶⁶²

205. As discussed below, **KARADŽIĆ**'s complete failure to prevent or punish

⁶⁵⁵ D1351.

⁶⁵⁶ D1738,p.5.

⁶⁵⁷ P938,p.36. *See also* III.B.1: The goal of ethnic separation.

⁶⁵⁸ D422,pp.18-19.

⁶⁵⁹ [REDACTED]; B.TADIĆ:T.44429,44433-44434.

⁶⁶⁰ *See e.g.* S.SRDIĆ:D2265,p.24; M.GRUBAN:D4388,para.25; B.RADAN:T.31095-31096; M.KATIĆ:D2651,para.3; Ž.MEJAKIĆ:D4138,para.20; Ž.MEJAKIĆ:T.44216-44217; O.MARKOVIĆ:D3073,paras.29-30.

⁶⁶¹ *See* Municipality Summaries; SICs; III.C.8.(g): CSs/War Presidencies/War Commissions; III.C.8.(h): RSMUP; III.C.8.(i): VRS; III.C.8.(k): TO.

⁶⁶² *See generally* III.C.8.(l): Paramilitaries/Volunteers/Serbian MUP. For example, in Zvornik, notorious paramilitary ŽUČO was paid by the CS and took orders from the Zvornik Brigade. [REDACTED]; [REDACTED]; P3170,p.7. In Sanski Most, the SOS paramilitary group was first subordinated to the CS, then the IKK 6th Brigade. D1679; [REDACTED]; V.NIKOLIĆ:T.45440-45441; D.MUDRINIĆ:T.47366,47367,47397-47398; P6680; P3397.

crimes against non-Serbs belies the claim that such crimes were condemned; these crimes were an intentional part of the implementation of the common criminal purpose.⁶⁶³

8. Organs used by **KARADŽIĆ** and other JCE members to implement the common criminal purpose

206. **KARADŽIĆ** was the Bosnian Serbs' political, governmental, and military leader from at least October 1991 to November 1995. He exercised ultimate authority over the Bosnian Serb political, governmental and military organs as well as key individuals involved in implementing the common criminal purpose.

207. **KARADŽIĆ** was President of the SDS party, President of the NSC, President of the Presidency, RS President, and Supreme Commander of the armed forces. His various formal titles aside, the RS was a party state and the power was in **KARADŽIĆ**'s hands as party president, "[w]hich means that he was the power".⁶⁶⁴ In the RS, "the absolute number one was Dr. Radovan **KARADŽIĆ**, without a contest".⁶⁶⁵

208. The SDS, RS Government, RS Presidency, RS Assembly, CSs, TO, RSMUP, VRS and Bosnian Serb paramilitaries played a crucial part in the implementation of the common criminal purpose, and **KARADŽIĆ** had a pivotal role in establishing and maintaining these organs and exercising authority and control over them. This authority was derived from both the *de jure* powers vested in him and the *de facto* relationships that existed between him and the most influential members of those organs. **KARADŽIĆ** also ensured coordination between these organs in the implementation of the common criminal purpose.

209. In respect of those organs over which he did not exercise direct authority, such as the JNA, VJ, Serbian MUP, and Serb paramilitaries, **KARADŽIĆ** ensured cooperation with them in the execution of the common criminal purpose.

210. The bodies through which **KARADŽIĆ** and other JCE members exercised their power and authority to implement the common criminal purpose are discussed

⁶⁶³ See III.D: **KARADŽIĆ** shared the intent for the crimes.

⁶⁶⁴ B.DERIC:P4982,para.13.

below.

(a) SDS

211. **KARADŽIĆ** was the President and unchallenged leader of the SDS, from its establishment in July 1990 to the end of the Indictment period. **KARADŽIĆ** and other members of the BSL used the SDS to implement their vision of an ethnically divided BiH.

(i) SDS ideology

212. **KARADŽIĆ** led the SDS to great success in the national elections in November 1990,⁶⁶⁶ following which—as the SDS's principal propagandist, Information Minister Velibor OSTOJIĆ, stated in 1995—the party "raised a rebellion" and "created a free territory".⁶⁶⁷

213. The SDS was a self-described "national movement"⁶⁶⁸ which asserted that it was raising Serbs from degradation,⁶⁶⁹ to the elevated respect and status that was their historical due,⁶⁷⁰ and combating threats to the very existence of Serbs.⁶⁷¹ SDS officials saw themselves as the beacons of the Serbian people, awakening its consciousness to dangers it had not understood. As OSTOJIĆ put it, the "SDS is responsible for the national resurrection of this people, for the national consciousness of this people, for the national reconciliation of this people, for the national defence of this people, for the prevention of a planned genocide over this people".⁶⁷² The RS was "one ethnic area [turned] into a state, thanks to a policy which was not ideology but national idea, and then transformed into the SDS programme".⁶⁷³ The SDS, OSTOJIĆ affirmed, created a state, state institutions and the army.⁶⁷⁴ **KARADŽIĆ** praised the SDS for "introducing Serbian awareness".⁶⁷⁵ This Serb national consciousness raised

⁶⁶⁵ M.MANDIĆ:C2,p.20.

⁶⁶⁶ R.DONIA:P971,p.23.

⁶⁶⁷ P970,p.292.

⁶⁶⁸ P1379,pp.353-354.

⁶⁶⁹ D83,p.36.

⁶⁷⁰ D422,p.40.

⁶⁷¹ P1353,pp.17-18; P956,pp.3-4,6,31,45.

⁶⁷² P970,p.291.

⁶⁷³ P970,pp.291-292.

⁶⁷⁴ P970,p.292.

⁶⁷⁵ P953,p.3.

by **KARADŽIĆ** and the SDS equated in practice to an embrace of SDS ideals and policy.⁶⁷⁶

(ii) **KARADŽIĆ's authority over the SDS**

214. The SDS was hierarchical and highly-disciplined,⁶⁷⁷ with **KARADŽIĆ** at its apex. As **KARADŽIĆ** described it, "this is a party which has its top and its bottom, and nobody will fuck about under our name."⁶⁷⁸ SDS members were subordinate to the President,⁶⁷⁹ as "the single most important central party institution".⁶⁸⁰ **KARADŽIĆ** was "an undisputed authority",⁶⁸¹ "the unrivalled leader of the Bosnian Serbs" and "the hub of SDS and SDS leadership operations", whose "pre-eminence was not challenged".⁶⁸² The SDS leadership under **KARADŽIĆ** was "uncontested".⁶⁸³ As one Assembly deputy told **KARADŽIĆ**, likening him to his father, "[t]here is a boss in the house and you are the boss now".⁶⁸⁴

215. From the earliest stages, the party sought to ensure an effective means of communicating instructions from the top and receiving reports from the bottom.⁶⁸⁵ **KARADŽIĆ** oversaw the creation of a party infrastructure which by late 1990 enabled him to reach the most remote local commune within two hours.⁶⁸⁶ On his order, both municipal and local SDS boards were instructed to meet once per week, and each member of a local board was responsible for ten to twenty households,⁶⁸⁷ enabling the leadership to reach every Serb. **KARADŽIĆ** described this system of grassroots party contacts as "our computer system [...] our best [...] our biggest force and the best connection".⁶⁸⁸

⁶⁷⁶ R.DONIA:T.3360. *See also* R.DONIA:T.3449.

⁶⁷⁷ P.TREANOR:P2536,paras.19,22; N.PRSTOJEVIĆ:T.12935-12939; M.DODIK:T.36872-36873,36878-36879; P.RADIĆ:P1,p.25; N.POPLAŠEN:T.43592; R.NEŠKOVIĆ:P2568,pp.165-166. *See also* P.TREANOR:P2536,pp.146,151-152,155-156,162,167-174,177. For an example of the hierarchical system in operation, *see e.g.* D278; P5889.

⁶⁷⁸ P2571,p.3. *See also* S.MIŠKOVIĆ:T.45353-45354.

⁶⁷⁹ P.TREANOR:P2536,paras.13,23-24,27,41,67; R.NEŠKOVIĆ:P2568,p.14.

⁶⁸⁰ P.TREANOR:P2536,para.24.

⁶⁸¹ R.NEŠKOVIĆ:P2568,p.39.

⁶⁸² P.TREANOR:P2536,paras.13,67. *See also* M.MANDIĆ:C2,p.20; N.POPLAŠEN:T.43588-43589,43592.

⁶⁸³ M.DODIK:T.36872-36873.

⁶⁸⁴ P1388,p.142.

⁶⁸⁵ P.TREANOR:T.14001-14002.

⁶⁸⁶ P2539,p.1; P.TREANOR:T.14002.

⁶⁸⁷ P2529.

⁶⁸⁸ P12,p.9.

216. **KARADŽIĆ**'s instructions were followed at all levels of the SDS. The highest ranking SDS cadres and appointees,⁶⁸⁹ including members of the BiH Collective Presidency **PLAVŠIĆ**⁶⁹⁰ and **KOLJEVIĆ**,⁶⁹¹ and high-ranking Ministerial officials such as Momčilo **MANDIĆ**,⁶⁹² answered to **KARADŽIĆ**. **MANDIĆ**, for example, referred to **KARADŽIĆ** as the "main boss".⁶⁹³ The exception was **KARADŽIĆ**'s old friend Momčilo **KRAJIŠNIK**, the Speaker of the Assembly and member of the five-person War Presidency with whom **KARADŽIĆ** shared policy and organisational responsibilities and with whom he collaborated as an equal.⁶⁹⁴

217. **KARADŽIĆ**'s instructions were also followed at the regional, municipal and local levels.⁶⁹⁵ For example, when Variant A/B was relayed to Ključ, local SDS member Brane **VOJVODIĆ** was willing to "accept all **KARADŽIĆ**'s proposals without seeing them".⁶⁹⁶ Following **KARADŽIĆ**'s call to implement Variant A/B's second stage, **DERONJIĆ** informed the Bratunac Municipal Board that "since it was an order, it is our duty to act accordingly",⁶⁹⁷ and the Bratunac SDS authorities did so.⁶⁹⁸ In March 1992, the Foča SDS wrote to the Office of the President "unconditionally supporting" the republican "Crisis Staff", and stating "[w]e are ready to carry out any order you issue".⁶⁹⁹ **KARADŽIĆ** himself boasted to the RS Assembly in February 1992 that "there is not a single municipality, with the exception of a small number of people in [Banja Luka] itself, which is not following our political line" and "I have good contact with all municipalities and there is not a single municipality in Krajina which does not support what the SDS has accomplished so far".⁷⁰⁰

218. The April 1992 statement of Vojo **KUPREŠANIN**, SDS Main Board member and ARK Assembly President, to JNA General Milutin **KUKANJAC** epitomises

⁶⁸⁹ In respect of **SIMOVIĆ**, **ŽEPINIĆ**, **STANIŠIĆ**, see P.TREANOR:P2536,paras.50-51; C.NIELSEN:P2958,para.14; D272; D357; D270; D364; P2963; D2926; P5680; P5682; D1435; D281; D4500; P6624; P1105,p.15.

⁶⁹⁰ P.TREANOR:P2536,paras.16-17,50-51; P5681; P2222.

⁶⁹¹ D329; D1282,p.2.

⁶⁹² C.NIELSEN:P2958,para.14; C.NIELSEN:T.16244; P2999; P1080; D272; P1079.

⁶⁹³ P5650,p.22.

⁶⁹⁴ P.TREANOR:P2536,paras.14-15; R.NEŠKOVIĆ:P2568,pp.19-21,205,254; P5833; P5816; P5811; P5803; P5793 ; P5785; D275; D276.

⁶⁹⁵ See e.g. P.RADIĆ:P1,pp.60-61.

⁶⁹⁶ P2592.

⁶⁹⁷ P2597,p.1.

⁶⁹⁸ P3199,pp.6-7.

⁶⁹⁹ P5515. See also P3337,p.2.

KARADŽIĆ's power and authority:

[W]e are waiting for **KARADŽIĆ** to return from Europe and tell us what we are to do next. I personally think, general, that I won't do anything until he returns, when he comes whatever he tells us we will do. He is now for us the supreme commander and we have no other commander [...]. We have our commander, it is that man, we must obey him [...].⁷⁰¹

KARADŽIĆ had an almost cult-like authority, with SDS members frequently displaying fawning deference to him.⁷⁰² Thus, when grappling with the discipline crisis that threatened his position, SDS Trebinje President **VUČUREVIĆ** "begg[ed]" **KARADŽIĆ** to come to Trebinje to show his support for him.⁷⁰³ **BRĐANIN** informed **KARADŽIĆ** that **KARADŽIĆ** had "300% popularity".⁷⁰⁴ **ČIZMOVIĆ** told **KARADŽIĆ** that "I'd die for you".⁷⁰⁵

219. As party President, **KARADŽIĆ's** statutory powers were considerable,⁷⁰⁶ and extended by a state of emergency which he unilaterally imposed after the Bosnian Assembly's adoption of the memorandum on independence.⁷⁰⁷ **KARADŽIĆ** reminded subordinates of his powers to enforce discipline. For example, when in January 1992 the Krajina SDS leadership sought to act outside party policy, he stated "I have the right, according to the statute, to approve your move or not. The higher organs approve the decisions of the lower organs of the party and that is clearly stated in the statute".⁷⁰⁸

220. **KARADŽIĆ** maintained close contact with SDS leaders in the field at the regional and municipal levels.⁷⁰⁹ Among other ways of ensuring adherence to his policies:

- **KARADŽIĆ** communicated frequently by phone with municipal or regional

⁷⁰⁰ D88,p.44.

⁷⁰¹ P987,p.2.

⁷⁰² D285; P2549; P5730.

⁷⁰³ P6228,p.4.

⁷⁰⁴ D285.

⁷⁰⁵ P5730.

⁷⁰⁶ **KARADŽIĆ's** statutory powers included creating SDS policies and strategies, and coordinating the work of party organs. P.TREANOR:P2536,paras.23,75.

⁷⁰⁷ P.TREANOR:P2536,para.23; P2581,p.4; P6238; P2556,pp.4-5,8-9,13-15;

R.NEŠKOVIĆ:P2568,p.246.

⁷⁰⁸ P2556,pp.13-14.

leaders, receiving information, providing guidance and issuing detailed instructions.⁷¹⁰ BRĐANIN sought guidance from **KARADŽIĆ** so frequently that **KARADŽIĆ** complained:

Fuck it, you keep calling me about every trivial matter, and I have five thousand things on my mind [...] Don't make me /take care/ of everything [...] can you solve a single problem without **KARADŽIĆ**? [...] Don't call me about every minor problem, I am not your nanny.⁷¹¹

KARADŽIĆ similarly used "my man"⁷¹² Božidar VUČUREVIĆ to ensure adherence to SDS policy in Herzegovina. As he told him in July 1991, "[k]eep everything under your control, the entire Herzegovina".⁷¹³ When Banja Luka leaders looked for guidance from **KARADŽIĆ** on "our goals regarding the further struggle in [BiH]", stating "[t]hat's why you, boss, should come over here as soon as possible", **KARADŽIĆ** assured them that central leadership had a plan: "Everything's been worked out. You don't need to worry."⁷¹⁴ **KARADŽIĆ**'s control over SDS operations is evidenced by his 1 March 1992 instructions to the SDS Executive Board President Rajko DUKIĆ to initiate a blockade of Sarajevo.⁷¹⁵ His micromanagement of local issues is reflected in his instructions on changing the name of a Srbac school.⁷¹⁶

- **KARADŽIĆ** visited municipal leaderships personally.⁷¹⁷ For example, by January 1992 he had been to Banja Luka 27 times.⁷¹⁸ He attended meetings of the local and municipal boards in Novo Sarajevo and used his personal

⁷⁰⁹ P.TREANOR:P2536,para.25. *See also* D88,p.44.

⁷¹⁰ *See e.g.* P5889; D285; P4; D1290; P6509; P2555; P5855; P5895; P5894; P5643; P5845; P6228; P5842; D3149; P2551; P2550; P2552; P1084; D1643; D277; P5886; D1181; D3149; P5876; P2557; D1642; D3375; P5783; P3337; D4543; P2553; P1084; P5786; P5682; P2558; P5631; P2574; D289; P5633; P5731; D1435; P5680; D281; D4500; P5730.

⁷¹¹ P2549,pp.3-5.

⁷¹² P2544,p.4.

⁷¹³ D3170,p.6.

⁷¹⁴ P2555.

⁷¹⁵ P5731.

⁷¹⁶ M.MILINČIĆ:T.44948-44951; D4186.

⁷¹⁷ **Rogatica:** [REDACTED]
 S.VESSELINOVIĆ:D2950,para.23; **Ilidža:**R.KEZUNOVIĆ:P2526,para.71; **Novo Sarajevo:**Z.SALIPUR:T.31640-31641; R.NEŠKOVIĆ:P2568,pp.54-59,86-90; P2576,pp.3,6;
Foča:R.MLAĐENOVIĆ:D3314,para.16; KDZ239:P3336,pp.6-7; KDZ239:T.18961-18962; **Sanski Most:**P3640,pp.15-16; **Prijedor:**S.SRDIĆ:D2265,pp.6,8-9; N.SIVAC:P3478,pp.13-15;
Bratunac:D4504; P5730.

authority to resolve issues,⁷¹⁹ including removing the local SDS president⁷²⁰ in part for his failure to take any action to stop Muslim immigrants from building homes in Novo Sarajevo.⁷²¹ **KARADŽIĆ** resolved a Trebinje leadership dispute by going there and "sack[ing] some fools".⁷²²

- **KARADŽIĆ** dispatched senior SDS officials as emissaries to communicate leadership decisions to lower levels, solve problems that arose, and to report back to the republic level.⁷²³ **KRAJIŠNIK**, while reluctant to confirm his prior testimony that there were "hundreds" of such emissaries, accepted that there was a "large number" of them.⁷²⁴
- **KARADŽIĆ** received frequent visits from municipality representatives, to whom he issued instructions which the representatives then disseminated locally.⁷²⁵
- **KARADŽIĆ** received reports from **KRAJIŠNIK**,⁷²⁶ who himself had frequent contact with municipal representatives.⁷²⁷
- **KARADŽIĆ** received information and gave instructions through party channels.⁷²⁸

221. In this way, **KARADŽIĆ** ensured both that the local SDS was fully informed of his policy and instructions, and he was fully informed of the local implementation of

⁷¹⁸ P2556,p.12; D88,p.44; P1405,p.172.

⁷¹⁹ Z.SALIPUR:T.31640-31641; R.NEŠKOVIĆ:P2568,pp.54-59.

⁷²⁰ R.NEŠKOVIĆ:P2568,pp.86-90. *See also* P2576,pp.3,6.

⁷²¹ P2576,p.4; R.NEŠKOVIĆ:P2568,pp.92-93. *See also* R.NEŠKOVIĆ:P2568,pp.54-59; P2574.

⁷²² P2544,pp.3-4.

⁷²³ R.NEŠKOVIĆ:P2568,pp.33-34,139-145,151-154,171-173. *See also e.g.* P2551; P2550,p.3;

Prijedor:P3200; **Bratunac**:D.GUŠIĆ:P3196,paras.33-35; P3200,pp.1-2;

Foča:KDZ017:P3568,pp.134-135,173-174; KDZ017:T.19867; [REDACTED]; KDZ239:P3336,p.7; KDZ239:T.18961-18962.

⁷²⁴ M.KRAJIŠNIK:T.43862-43863; P6516,pp.14-15.

⁷²⁵ R.NEŠKOVIĆ:P2568,pp.46,166; B.ĐERIĆ:P4982,para.41; B.GRUJIĆ:T.40373-40374; B.GRUJIĆ:P6414,p.9; **ARK**:P5886; P2559,pp.4,6; **Ilidža**:R.KEZUNOVIĆ:T.13886-13887; **Hadžići**:T.GLAVAŠ:P2296,para.25; **Bratunac**:N.RISTIĆ:T.15391-15393; D.GUŠIĆ:T.17793,17802-17804; D.GUŠIĆ:P3196,paras.40-41; P3197,pp.9-10,13; **Brčko**:Đ.RISTANIĆ:P3023,paras.13-14,29,229-231; Đ.RISTANIĆ:T.16817-16819; **Zvornik**: [REDACTED]

⁷²⁶ *See e.g.* P3200; P5785.

⁷²⁷ N.PRSTOJEVIĆ:P2513,p.1.

⁷²⁸ N.PRSTOJEVIĆ:T.12936-12939; R.KEZUNOVIĆ:P2526,paras.16,21-24.

both.⁷²⁹ As discussed below, this communication with the local leadership continued after the conflict had broken out.⁷³⁰

222. **KARADŽIĆ** had ultimate authority over SDS appointments,⁷³¹ often bypassing party structures. For example, he personally appointed seven of the eight ministers in the multi-ethnic BiH government representing the SDS, none of whom were SDS members. The eighth minister was **KARADŽIĆ**'s close associate **OSTOJIĆ**.⁷³² His degree of control over the SDS is evidenced by his micromanaging of appointments at all levels of the party,⁷³³ including local SDS leaders.⁷³⁴ When, for example, in April 1992, there was a clash "as to how power should be established" in Ilidža,⁷³⁵ because an Ilidža SDS activist objected to **PRSTOJEVIĆ** "surrounding himself with scum",⁷³⁶ the BSL—including **KARADŽIĆ**—supported **PRSTOJEVIĆ**, resulting in him remaining in Ilidža "for a long, long time".⁷³⁷

223. **KARADŽIĆ** insisted on centralisation and uniformity of approach, and actively enforced party discipline.⁷³⁸ "Obedience was required".⁷³⁹ Those who strayed from party policy found themselves marginalised,⁷⁴⁰ out of the party,⁷⁴¹ or branded as traitors.⁷⁴² As **KARADŽIĆ** stated, "once the Party has adopted a policy anything else is treason. Anything outside the adopted policy is treason. [...] I will signal to the people, people, this man is a traitor".⁷⁴³

224. **KARADŽIĆ** invoked his authority and disciplinary powers to ensure

⁷²⁹ See e.g. R.KEZUNOVIĆ:P2526,para.24; B.GRUJIĆ:T.40373-40374; B.GRUJIĆ:P6414,p.9; **Hadžići**:T.GLAVAŠ:P2296,para.25; **Rogatica**:P6105.

⁷³⁰ See III.C.9: **KARADŽIĆ** had a comprehensive communications network; III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.

⁷³¹ See e.g. M.DODIK:T.36873-36875,36881-36889.

⁷³² R.NEŠKOVIĆ:P2568,pp.178-179,229. See further III.C.8.(b): Government.

⁷³³ D1277,pp.1-2; P1377,pp.17,167; P6337; P6338; P6339; V.LUKIĆ:T.38759-38763; D285.

⁷³⁴ **Bratunac**:D.GUŠIĆ:T.17792-17793; **Novo Sarajevo**:R.NEŠKOVIĆ:P2568,pp.86-90; P2576,pp.3,6; **Prijedor**:P2571; S.MIŠKOVIĆ:T.45351-45361; S.SRDIĆ:D2265,pp.4-9,41-43.

⁷³⁵ M.MANDIĆ:C2,p.29.

⁷³⁶ P1085,p.1.

⁷³⁷ M.MANDIĆ:C2,p.29.

⁷³⁸ R.NEŠKOVIĆ:P2568,pp.37-38. See also P2556,pp.8,10-11; P2714,p.5; D277,p.6; P5643,p.2; P.TREANOR:P2536,para.25; D273,p.30.

⁷³⁹ NEŠKOVIĆ:P2568,p.37. See also S.MIŠKOVIĆ:T.45351-45361.

⁷⁴⁰ M.DODIK:T.36878-36880; R.NEŠKOVIĆ:P2568,pp.41,99-105.

⁷⁴¹ P938,p.34; D88,p.72; R.NEŠKOVIĆ:P2568,p.41; P2572; S.MIŠKOVIĆ:T.45354.

⁷⁴² P2559,p.3; P.TREANOR:P2536,para.57; P6229,pp.6-7; P2557,pp.3-4; M.DODIK:T.36879-36880; R.NEŠKOVIĆ:P2568,p.73; D83,p.14; [REDACTED].

⁷⁴³ D88,p.46.

adherence to policy,⁷⁴⁴ "in his own special way".⁷⁴⁵ For example, when Banja Luka authorities acted contrary to SDS policy in June 1991, **KARADŽIĆ** fumed "they are complete idiots [...] insolent mother fuckers", stating that as long as they were in the SDS, they would follow party policy or "take off the SDS badge and [...] eat [shit] in their own name". **KARADŽIĆ** threatened to personally come to Banja Luka and take the offenders off the municipal election list if they were "sabotaging my politics".⁷⁴⁶ Similarly, when the Krajina SDS leadership challenged party policy in early 1992, he threatened that "I will send them all to hell, I will suspend the Party in Krajina and make a new Party with new people", "whoever makes a mistake I will suspend him and throw him out of the party, I do not give a fuck", and "with one stroke of the pen I will finish them".⁷⁴⁷ These were no empty threats. When, for example, in Prijedor, the existing municipal SDS President would not follow SDS policy, **KARADŽIĆ** intervened, warning "[l]et them fuck their mothers, let them make their own party, let them resign. Whoever refuses to obey Sarajevo should resign",⁷⁴⁸ before replacing the local president.⁷⁴⁹ Equally, when **KARADŽIĆ**'s close associate Božidar VUČUREVIĆ⁷⁵⁰ faced a discipline crisis that threatened his position as municipal SDS president, **KARADŽIĆ** raged: "I will banish them so that they will not dare show their faces anywhere", while assuring VUČUREVIĆ that he would come and "bring it all to an end".⁷⁵¹ **KARADŽIĆ** made good on his word, subsequently explaining he had "been to Trebinje and sacked some fools" who had "wanted to replace my man".⁷⁵²

225. Predrag RADIĆ observed that based on his experience in the Krajina, when people on the ground in the municipalities disregarded or disobeyed orders that came from Pale, some were immediately removed from their positions, while others were subjected to disciplinary pressures known informally as "ironing," which would cause

⁷⁴⁴ D1289,pp.6-7; P2557; P2572; P2556; P2714; D271,pp.2,5-6; D3367; D1293; P2571; P5841,pp.3-5; D274,p.1.

⁷⁴⁵ R.NEŠKOVIĆ:P2568,pp.37-38.

⁷⁴⁶ D1289,pp.6-8. *See also* D1293.

⁷⁴⁷ P2556,pp.2,4,15. *See further* III.C.8.(g).(vii).a: ARK was subordinated to republic-level.

⁷⁴⁸ P2571,p.3.

⁷⁴⁹ S.MIŠKOVIĆ:T.45352-45362; R.NEŠKOVIĆ:P2568,pp.35-39; S.SRDIĆ:D2265,pp.4-5. *See also* P2557.

⁷⁵⁰ T.KOMAD:T.36330.

⁷⁵¹ P6229,pp.7-8.

⁷⁵² P2544,pp.6-7. *See also* P6228; D1275,pp.6-7; P6230; T.KOMAD:T.36322-36325.

the officials to change their views.⁷⁵³ Asked to elaborate on "ironing", RADIĆ stated "[y]ou know very well what ironing means in inverted [commas], but it's not a tepid iron either, it's a very hot one."⁷⁵⁴ NEŠKOVIĆ concurred that "if someone wanted to resist [KARADŽIĆ], it was necessary to have a lot of courage", giving the example of one MILAKOVIĆ who was expelled from the Main Board for publicly opposing KARADŽIĆ.⁷⁵⁵

226. KARADŽIĆ's insistence on strict adherence to SDS policy was echoed at a local level. [REDACTED]

(iii) The SDS implemented the common criminal plan

227. The SDS played a central role in implementing the common criminal plan. From 1990, but particularly as Bosnian independence loomed, the SDS armed the Serb people and organised them for war.⁷⁵⁷ General GVERO declared in 1993, "[t]he SDS and the state institutions that have been established take the most credits for arming the Serb people with personal weapons, which was made possible by the support of the many Serb officers in the commands of the former JNA on the territory of the former BiH."⁷⁵⁸

228. Together with the JNA,⁷⁵⁹ the SDS distributed weapons,⁷⁶⁰ organised training,⁷⁶¹ and mobilised the Serb TO⁷⁶² and paramilitary units.⁷⁶³ Contrary to the contention of Defence witnesses,⁷⁶⁴ this did not constitute an *ad hoc* "self-organisation" by individuals, but rather, in the words of Foča SDS leader Miroslav STANIĆ, in 1991 the SDS "began with the self-organisation of the Serbian

⁷⁵³ P.RADIĆ:P1,pp.93-94.

⁷⁵⁴ P.RADIĆ:P3,p.56.

⁷⁵⁵ R.NEŠKOVIĆ:P2568,p.41.

⁷⁵⁶ [REDACTED].

⁷⁵⁷ See further Municipality Summaries for evidence of arming in the charged municipalities. See also P2739,p.4.

⁷⁵⁸ P1379,p.354.

⁷⁵⁹ See e.g. D325,p.14; P979,pp.6,11-12; P3660; P.TREANOR:P2536,para.82.

⁷⁶⁰ See e.g. D325,p.14; P979,pp.1,3,6,11-12; P1379,p.354; A.DŽAMBASOVIĆ:P2828,paras.41-54; P2831,p.10; D.KOVAČEVIĆ:T.39646-39649; P1477,p.296; P6072; M.GAGOVIĆ:T.31882-31885; P5629; S.VELJOVIĆ:T.29258-29261.

⁷⁶¹ [REDACTED]; D277.

⁷⁶² See e.g. D325,pp.69,75.

⁷⁶³ See e.g. Bijeljina, Sanski Most, Rogatica Summaries.

⁷⁶⁴ See e.g. A.GRAHOVAC:T.44054-44056; S.GALIĆ:T.37158-37159; R.RADINOVIĆ:T.41491-41492.

people".⁷⁶⁵

229. **KARADŽIĆ** spearheaded these efforts. Through SDS channels he instructed Serbs to respond to JNA mobilisation,⁷⁶⁶ and directed the arming, organisation and mobilisation of Bosnian Serbs outside JNA structures.⁷⁶⁷ As Vogošća municipal leader and close **KARADŽIĆ** associate Jovan TINTOR later stated in 1995: "I went from municipality to municipality and created military formations on order from my president [...] We created brigade commanders down to platoon commanders. All this was done by SDS".⁷⁶⁸ **KARADŽIĆ**, referring to TINTOR's remarks, confirmed that "when it all began, the Serbian people was ready, more ready than ever. There was a brigade or a detachment in each municipality".⁷⁶⁹ By 20 March 1992, the JNA and the SDS had distributed nearly 70,000 weapons to Bosnian Serbs outside the JNA or TO structures.⁷⁷⁰ As KUKANJAC noted earlier in the same report, the Bosnian Serbs were "fully prepared to wage a war" should their demands on Bosnia not be met.⁷⁷¹ **KARADŽIĆ**'s April 1992 claim that the Bosnian Serbs "have no armed force. We have always asked the Serbs not to mobilize"⁷⁷² was another lie.

230. Under **KARADŽIĆ**'s leadership, the SDS initiated and implemented the regionalisation of BiH.⁷⁷³ On 26 October 1991, he ordered all municipal presidents to, *inter alia*, form commands, set up round-the-clock duty and takeover power in public bodies.⁷⁷⁴ The day before the plebiscite, **KARADŽIĆ** affirmed this order, stating:

You, presidents of municipalities, you have to do this job [...] Because you are presidents of the national defence councils, and you are commanders of your towns [...] I am asking you to be energetic and strict; to get ready and establish your authority in your territories; in municipalities, regions, local communities, and to prepare yourselves for restructuring and regionalizing the municipalities.⁷⁷⁵

231. As discussed above, on **KARADŽIĆ**'s instructions, the SDS established

⁷⁶⁵ P6081.

⁷⁶⁶ D278; P5889; P5882; D4533; P5640; D290; D4024; P5632; P5826.

⁷⁶⁷ P5888; D1643; D277; P3406; S.VESELINOVIĆ:T.45093-45101; P5845; P5885.

⁷⁶⁸ P970,p.298.

⁷⁶⁹ P970,pp.315-316.

⁷⁷⁰ P979,p.6.

⁷⁷¹ P979,p.4.

⁷⁷² D1591,p.1.

⁷⁷³ See III.C.1: Preparations to create a Serb-dominated state within Bosnia; D296,pp.18-19,22,25; P.TREANOR:P2536,paras.54,135; P2530; P2544,p.3.

⁷⁷⁴ P2548; P3581; P2547,p.4.

parallel structures to assert control in municipalities,⁷⁷⁶ as a precursor to division and forcible removal of non-Serbs. As discussed in detail below, the CSs formed from SDS municipal leaderships on **KARADŽIĆ**'s instructions were central to the implementation of the common criminal plan.⁷⁷⁷

232. Within two years of its formation, **KARADŽIĆ** had led the SDS through its evolution from a political party to an ethnically-Serb state structure in control of over 70% of territory in BiH.⁷⁷⁸ In 1994, Assembly deputy and former Sanski Most CS member Vlado VRKEŠ summed up the prior four years thus: "[w]e have risen to create a Serbian state and we must persevere in this. Everything we have was created by SDS."⁷⁷⁹

233. Defence assertions that the party was frozen from March 1992 to February 1993⁷⁸⁰ merely highlight this party-state transformation.⁷⁸¹ Nevertheless, the power of the SDS structures continued to be felt after the formalisation of RS state organs. As ĐERIĆ explained, the SDS party structure outweighed the rule of law in the RS, with everything centred on **KARADŽIĆ**.⁷⁸² Vladimir LUKIĆ, who took over from ĐERIĆ as Prime Minister initially claimed he "never had problems with Dr **KARADŽIĆ** with regard to my independence or the independence of the Government."⁷⁸³ However, LUKIĆ admitted his memory was "jogged"⁷⁸⁴ by a 12 April 1993 letter from the SDS Executive Committee expressing the party's rage at LUKIĆ's efforts to assert control over government personnel decisions, stating, *inter alia* "you are the Executive Authority of the Assembly with the majority of seats of the [SDS], you implement the policy of that party."⁷⁸⁵ In the face of such evidence, LUKIĆ agreed that **KARADŽIĆ**'s role was "of course, the highest when it comes to the personnel [...] regardless of whether the proposing party is the government or the SDS board"⁷⁸⁶ and

⁷⁷⁵ P958,p.10.

⁷⁷⁶ See III.C.2: Variant A/B.

⁷⁷⁷ See III.C.8.(g): CSs/War Presidencies/War Commissions.

⁷⁷⁸ D92,pp.38,48,55.

⁷⁷⁹ P970,p.178.

⁷⁸⁰ See e.g. S.KOVAČEVIĆ:T.45166-45167.

⁷⁸¹ P.TREANOR:P2536,para.293.

⁷⁸² B.ĐERIĆ:P4982,para.14.

⁷⁸³ V.LUKIĆ:D3563,para.27.

⁷⁸⁴ V.LUKIĆ:T.38761.

⁷⁸⁵ P6337.

⁷⁸⁶ V.LUKIĆ:T.38763. See also P970,pp.108,319.

added that **KARADŽIĆ** was "president of the SDS and President of Republika Srpska, and that is absolutely the highest level".⁷⁸⁷

(b) Government

234. The Government was formed on 24 March 1992.⁷⁸⁸ It took over the responsibilities of the "Council of Ministers",⁷⁸⁹ a body that had served as a government in waiting⁷⁹⁰ since December 1991.⁷⁹¹ The Council had been comprised primarily of the ranking Serb officials within various ministries of the joint BiH government; its President and most of its members were SDS members.⁷⁹² Formed when moves toward independence were mounting in BiH, the Council had immediately identified its priorities as "the defining of ethnic territory, establishment of government organs in the territory and the economic disempowerment of the current authorities in the Socialist Republic of BH."⁷⁹³

235. The Government was a tool for implementing the BSL's policies of ethnic separation.⁷⁹⁴ Through Government structures—including the Interior,⁷⁹⁵ Justice⁷⁹⁶ and Defence⁷⁹⁷ Ministries—**KARADŽIĆ** and his fellow JCE members orchestrated policies and directed forces in furtherance of the common purpose.

236. The Government and its structures fell under **KARADŽIĆ**'s authority and control. According to ĐERIC, the RS's first Prime Minister, "**KARADŽIĆ** considered himself to be the government [...]".⁷⁹⁸ As **KARADŽIĆ** noted to the Assembly in 1993:

But, believe me, the Government is mine. I am responsible for its functioning. I appoint and propose the Government mandator. I have a brilliant relationship with [then President of the Government, *i.e.*,

⁷⁸⁷ V.LUKIĆ:T.38763.

⁷⁸⁸ P961,pp.24-26. *See also* P.TREANOR:P2536,para.179.

⁷⁸⁹ P1354,pp.3-7; P.TREANOR:P2536,paras.210,222-223.

⁷⁹⁰ P.TREANOR:P2536,para.207,fn.563. *See also* D90,p.7.

⁷⁹¹ P1345,pp.6-9. *See also* P.TREANOR:P2536,paras.176,207.

⁷⁹² P1345,pp.6-8. *See also* P.TREANOR:P2536,para.221,p.162.

⁷⁹³ P1082,p.2. *See also* P.TREANOR:P2536,para.176.

⁷⁹⁴ *See e.g.* R.NEŠKOVIĆ:P2568,pp.189-190,255.

⁷⁹⁵ III.C.8.(h): RSMUP.

⁷⁹⁶ III.C.8.(c): Exchange Commission.

⁷⁹⁷ III.C.8.(i): VRS.

⁷⁹⁸ B.ĐERIC:P4982,para.13.

Prime Minister] Vlado LUKIĆ; we are often together; he often comes to my cabinet.⁷⁹⁹

237. **KARADŽIĆ** reiterated this point in March 1995, when he told fellow attendees of a Supreme Defence Council meeting that:

Every army, every structure; and every honour to it if it succeeds; I am responsible. The army is mine as much as the minister's. As much as the Prime Minister is mine, so the army is mine [...].⁸⁰⁰

238. **KARADŽIĆ**'s position as SDS President was part of this authority. In April 1993, **KARADŽIĆ**'s SDS criticised the then Prime Minister LUKIĆ for his "increasing number of attempts to deny the undeniable political facts and taking unauthorized authorizations on all levels of conducting the policy" without party approval, reminding LUKIĆ that "[a]s the party in power, we conduct the personnel policy" and that "on all levels, from the municipality to the Republic, no appointments will be possible without our approval".⁸⁰¹

239. As noted above, LUKIĆ admitted at trial that **KARADŽIĆ**'s role "is, of course, the highest when it comes to the personnel" and that **KARADŽIĆ** "is president of the SDS and President of Republika Srpska, and that is absolutely the highest level".⁸⁰² LUKIĆ demonstrated his adherence to the common purpose when he advocated in 1993 that the FRY authorities "ethnically cleanse [the historically Muslim] Sandžak [region of Serbia and Montenegro] and kill the Muslims there".⁸⁰³

240. **KARADŽIĆ**'s control of the RS Government was also plain to RS Assembly members. In 1993, Assembly Vice-President Milovan MILANOVIĆ noted that **KARADŽIĆ**'s "responsibility is the biggest one but you cannot do everything. [...] The task of the Government is defined. However, you didn't give anything to Government to do".⁸⁰⁴

⁷⁹⁹ P1379,p.255.

⁸⁰⁰ P3149,p.21. *See also* P1481,p.110. This entry in the MLADIĆ notebook was likely made on 1 November 1992, rather than "Sunday, 1 October 1992", as noted. 1 October 1992 fell on a Tuesday, not a Sunday, and this entry follows the entry for 31 October 1992.

⁸⁰¹ P6337.

⁸⁰² V.LUKIĆ:T.38762-38763. *See also* P6338; P6339; P6340.

⁸⁰³ M.BULATOVIĆ:T.34543-34544.

⁸⁰⁴ P1379,p.243.

241. Although the Constitution provided that the Prime Minister-designate was to propose ministers to the Assembly for approval,⁸⁰⁵ ĐERIĆ was told by **KARADŽIĆ** whom to appoint.⁸⁰⁶ ĐERIĆ did not even know STANIŠIĆ, MANDIĆ or SUBOTIĆ when he nominated them, on **KARADŽIĆ**'s instructions, to serve in the Government ĐERIĆ nominally oversaw.⁸⁰⁷ OSTOJIĆ, whom ĐERIĆ described as an extremist, was nominated because he was "a man who was trusted by the party president" who was "always in direct contact with the party leadership and the Presidency" so much that "he was more in the Presidency than he was in the government".⁸⁰⁸

242. **KARADŽIĆ** directly controlled Government ministers. ĐERIĆ complained about the fact that **KARADŽIĆ** and KRAJIŠNIK—"the Alpha and Omega" of the Government⁸⁰⁹—had authority over STANIŠIĆ and MANDIĆ and he did not.⁸¹⁰ Instead, STANIŠIĆ and MANDIĆ, two of the most powerful Government ministers—and those most involved in the detention of Muslim and Croat civilians—reported to and took orders from **KARADŽIĆ** and KRAJIŠNIK.⁸¹¹ In MANDIĆ's words, referring to an instruction from KRAJIŠNIK to release someone from detention, "I acted as a soldier carrying out his order."⁸¹²

(c) Exchange Commission

243. On 8 May 1992, less than a month after the RS Government began functioning, it created an organ that facilitated the forcible removal of non-Serbs in massive numbers—the "Central Commission for the Exchange of Prisoners-of-War, Arrested Persons and the Bodies of Those Killed" ("Exchange Commission").⁸¹³ Through it flowed masses of non-Serb civilians from the archipelago of detention facilities throughout the RS.⁸¹⁴ Those detainees were transferred *via* the Exchange

⁸⁰⁵ P5578,p.19,Art.93; B.ĐERIĆ:P4982,para.7.

⁸⁰⁶ B.ĐERIĆ:P4982,paras.7-9; B.ĐERIĆ:T.27943.

⁸⁰⁷ B.ĐERIĆ:P4982,paras.8-9.

⁸⁰⁸ B.ĐERIĆ:P4982,paras.10-12.

⁸⁰⁹ B.ĐERIĆ:T.27952.

⁸¹⁰ B.ĐERIĆ:P4982,paras.15,21-23; P1105,p.12; B.ĐERIĆ:T.27947-27949,27983.

⁸¹¹ M.MANDIĆ:C2,p.249; P5646. *See* III.C.8.(a).(ii): **KARADŽIĆ**'s authority over the SDS; III.C.8.(h).(vi): **KARADŽIĆ**'s authority and control over the RSMUP.

⁸¹² M.MANDIĆ:C2,p.249.

⁸¹³ P1088. *See also* M.MANDIĆ:T.4538; AF2075; AF2076.

⁸¹⁴ *See further* III.C.6: Pattern of crimes.

Commission to locations outside RS, completing the process of permanent removal that had begun with their detention.⁸¹⁵

244. The Exchange Commission was a network of regional and municipal exchange bodies,⁸¹⁶ a "pyramid of commissions"⁸¹⁷ with the Central Commission on top comprised of representatives from the Ministry of Justice, the Ministry of the Interior and the National Defence Ministry⁸¹⁸ and operating under the jurisdiction of the Ministry of Justice.⁸¹⁹

245. The Exchange Commission was created pursuant to a 24 April 1992 decision by the NSC and Government that "the Ministry of Justice shall take over the exchange of prisoners once the organs of the interior have completed their work."⁸²⁰ The impetus for its creation was the large number of non-Serbs who had already been incarcerated.⁸²¹ It was a "state level" response to "tremendous problems on the ground" related to an influx of detained persons.⁸²²

246. From its inception, the Exchange Commission aimed to systematise the detention and permanent removal of non-Serb civilians.⁸²³ MANDIĆ acknowledged that the Commission dealt with civilians,⁸²⁴ explaining: "The army set up collection centres, as did the police, and the people from war-torn areas were brought there, and they were either exchanged or ethnic cleansing was conducted where there were no war operations".⁸²⁵ SUBOTIĆ admitted that the "important, complex and delicate" problem discussed by the Government in mid-June 1992⁸²⁶ was the issue of civilian detention.⁸²⁷

⁸¹⁵ See e.g. P1129; P1101; P4867,p.4; A.MAŠOVIĆ:P4850,paras.31,49-50; P1127.

⁸¹⁶ P1088; M.MANDIĆ:C2,pp.141,149,165; P1091,pp.1-2; P3091,p.5; P1090. See also A.MAŠOVIĆ:P4850,para.13.

⁸¹⁷ M.MANDIĆ:C2,p.149.

⁸¹⁸ See P1088.

⁸¹⁹ P1134,para.19.

⁸²⁰ P1087,p.1. See also M.MANDIĆ:C2,pp.141,147-148.

⁸²¹ P1089,p.2.

⁸²² M.MANDIĆ:C2,p.141.

⁸²³ P1090,p.1; M.MANDIĆ:C2,pp.131-132,145,147-148.

⁸²⁴ M.MANDIĆ:C2,p.153.

⁸²⁵ M.MANDIĆ:C2,p.314.

⁸²⁶ P1095,p.4.

⁸²⁷ B.SUBOTIĆ:T.40118.

247. The Exchange Commission both reflected and implemented the BSL's policy of permanent removal.⁸²⁸ The Commission made clear that the confinement and exchange of non-Serbs was not a mere local affair. At a meeting on Tuesday 2 June BRĐANIN informed **KARADŽIĆ** and **MLADIĆ** of "Problem of the Krajina: 14,500 Muslims" and asked for a position "at the highest level" regarding prisoners and refugees.⁸²⁹ BRĐANIN was presumably informing the BSL about the shortages of food, clothing and space—"the usual problems facing collection centres at the time, when there was a high concentration of people in a small space"—that Prijedor authorities had reported to BRĐANIN at one of their regular Monday meetings, along with their threat to "bring all those people to Banja Luka".⁸³⁰ At roughly the same time, WILSON confronted **PLAVŠIĆ**, in **KARADŽIĆ**'s presence, with allegations of "large-scale detention of civilians" that had surfaced in media reports.⁸³¹

248. On 6 June—four days after BRĐANIN's report on the "Problem of the Krajina"—the Exchange Commission sought to further centralize detentions and exchanges, ordering that the police submit prisoner lists to municipal exchange commissions and limit access to detention facilities to certain government officials.⁸³² Although the order states that women whose detention "is not related to the war or war activities," children and "old and helpless persons" should be unconditionally released,⁸³³ the order contradicts itself by forbidding the release or exchange of any detainees "without prior order" of the Exchange Commission.⁸³⁴ The fact that the Exchange Commission subsequently oversaw the expulsion through "exchange" of thousands of women, children and elderly non-Serbs demonstrates that this aspect of the order was not intended to be implemented. In any event, the order clearly indicated that adult males—regardless of their status—were not to be released.⁸³⁵ Similarly, although the order recites requirements for minimum accommodation and hygiene standards,⁸³⁶ the failure of the authorities to implement this aspect of the

⁸²⁸ See e.g. P4867, pp.2-3; A.MAŠOVIĆ:P.4850, paras.30-31,49-50.

⁸²⁹ P1478, pp.55-56

⁸³⁰ M.SAJIĆ:D4114, paras.50,56,58; M.SAJIĆ:T.44146-44147. SAJIĆ did not specifically date this meeting.

⁸³¹ J.WILSON:P1029, paras.101-102; J.WILSON:P1029, paras.84-90.

⁸³² P1090. See also M.MANDIĆ:C3, pp.46-48; M.MANDIĆ:T.4569,4604.

⁸³³ P1090, p.3.

⁸³⁴ P1090, p.1.

⁸³⁵ See M.MANDIĆ:C2, pp.159-160.

⁸³⁶ P1090, pp.1-2.

order in the face of mounting evidence of horrific conditions of detention,⁸³⁷ demonstrates that, here too, the authorities were attempting to insulate themselves from responsibility for the sub-standard conditions of detention. In July 1992, the Government sought to further systematise the process by directing the RSMUP to develop an "agreed criteria regarding the moving out of the [Muslim] population from [RS territory]".⁸³⁸

249. Within a week of its creation, the Exchange Commission was used as a tool for forcible expulsion. In early May, as part of the violent takeover of Bratunac municipality,⁸³⁹ Serb Forces detained hundreds of Muslims in the Vuk Karadžić School in Bratunac⁸⁴⁰ in brutal conditions⁸⁴¹ and inflicted horrific abuse on them, killing as many as 150.⁸⁴² The Bratunac CS received instructions from the "highest level" of the civilian and military authorities in Pale,⁸⁴³ following which the Exchange Commission, various CS leaders and leading Government members worked together to expel the roughly 400 survivors out of the RS *via* Pale.⁸⁴⁴ The Government implicitly acknowledged the criminality of this expulsion in its 15 May 1992 order to the Ilijaš CS to approve and provide passage for the prisoners from Pale to Visoko and requesting the CS to "destroy that approval the moment when the prisoners leave Ilijaš municipality".⁸⁴⁵

250. The Exchange Commission's role as a vehicle for civilian expulsion continued throughout the Indictment period.⁸⁴⁶ For example, the RS leadership took advantage of a prisoner-exchange agreement reached with BiH officials on 1 October 1994 to "[expel] the remaining Bosniak population from four Rogatica villages"—including women, children, and the elderly.⁸⁴⁷ As TOLIMIR had noted two days previously, "we

⁸³⁷ See III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.

⁸³⁸ P1098, pp.4-5; M.MANDIĆ:C2, pp.318-319.

⁸³⁹ See Bratunac Summary.

⁸⁴⁰ [REDACTED]. See also P3208(B/C/S).

⁸⁴¹ See SIC:C.6.2(Bratunac).

⁸⁴² See Bratunac Summary; SIC:B.4.1(Bratunac).

⁸⁴³ See Bratunac Summary.

⁸⁴⁴ P3208(B/C/S); P2619; B.ĐERIĆ:P4982, para.34; P1604; P4983. See also Z.ČVORO:T.30945-30947.

⁸⁴⁵ P1604.

⁸⁴⁶ See e.g. B.SUBOTIĆ:T.40084; B.SUBOTIĆ:D3695, para.185; P4975.

⁸⁴⁷ P4867, p.4. See also A.MAŠOVIĆ:P4850, paras.31, 49-50; P1127.

receive captured soldiers of the Republic Srpska while we mostly give them civilians".⁸⁴⁸

251. As discussed below, the Government also furthered the common purpose by systemising the confiscation of non-Serbs' property for deposit into RS Government coffers.⁸⁴⁹

(d) National Security Council (NSC)

252. On 27 March 1992, the Assembly established the NSC⁸⁵⁰ with **KARADŽIĆ** as its President.⁸⁵¹ Although ostensibly created as an advisory body,⁸⁵² the NSC, in effect, immediately turned into an executive organ⁸⁵³ or a "*de facto* expanded Presidency" resembling a central Bosnian Serb CS and executing powers similar to those of the Presidency.⁸⁵⁴ Thus, during the initial period of the conflict, the NSC was one of the organs through which **KARADŽIĆ** exercised authority over the Bosnian Serb Forces and republican, regional and municipal authorities.

⁸⁴⁸ P2684,p.1. *See also* V.LUKIĆ:T.38813. *See also* A.MAŠOVIĆ:P4850,para.51.

⁸⁴⁹ *See* III.C.8.(g).(iv): CSs organised and supported expulsions.

⁸⁵⁰ D304,p.10; AF2028.

⁸⁵¹ *See e.g.* P1355; P3050.

⁸⁵² The stated function of the NSC was to "consider political, constitutional-legal and other questions of interest for the security of the Serbian people in Bosnia and Herzegovina, give opinions and proposals on these questions to the Assembly and monitor the implementation of the decisions and other acts of the Assembly in regard to them". P.TREANOR:P2536,para.255.

⁸⁵³ P961,pp.10-11,14-15.

⁸⁵⁴ P.TREANOR:P2536,para.258; P.TREANOR:T.14060. *See also* R.THEUNENS:T.16887-16888; R.THEUNENS:P3033,pp.266-267.

253. The NSC, meeting in joint sessions with the Bosnian Serb Government,⁸⁵⁵ passed decisions on a variety of strategic and military issues. On 15 April 1992, it estimated that conditions existed to declare a state of imminent threat of war and appointed an Acting Commander of the TO and Chief of Staff.⁸⁵⁶ The same day, the Acting Presidents declared an imminent threat of war and called for mobilisation of the TO.⁸⁵⁷ On 20 April, the Minister of Defence (and Acting TO Commander) was given power to order the use of heavy weapons.⁸⁵⁸

254. The NSC also issued other important decisions, such as ordering the activation of CSs in certain conditions;⁸⁵⁹ determining that Serb positions be defended;⁸⁶⁰ and ordering a full mobilisation.⁸⁶¹ Its expansive executive/legislative authority allowed the NSC to pass decisions on matters well beyond those related to security.⁸⁶²

255. The NSC gave direct instructions to Ministries⁸⁶³ and other republic-level bodies,⁸⁶⁴ and asserted control over regional⁸⁶⁵ and local authorities, including by appointing municipal war presidencies,⁸⁶⁶ preparing CS instructions⁸⁶⁷ and putting OSTOJIĆ in charge of establishing authority in Sarajevo.⁸⁶⁸ Moreover, the NSC took measures to ensure it was properly informed about the situation on the ground by the Ministries of Defence and Internal Affairs⁸⁶⁹ and other government personnel,⁸⁷⁰ as well as by CSs.⁸⁷¹

256. As he would later in the Presidency, **KARADŽIĆ** dominated the NSC. As NSC President, he was charged with: coordinating command over the territorial

⁸⁵⁵ P3050; P3077; P3051; P1087; D406; D409; P3079.

⁸⁵⁶ P3050, pp.1-2.

⁸⁵⁷ P3922.

⁸⁵⁸ D219.

⁸⁵⁹ D394; P3051.

⁸⁶⁰ P3051.

⁸⁶¹ D406. *See also* AF2080; P2615.

⁸⁶² These included "the establishment of a news agency; the adoption of an anthem, coat of arms and flag; the monetary and payment system; the sale of apartments and other real estate; formation of a radio and television enterprise; the amount of radio and television subscriptions; appointment of editors of public media outlets; a psychiatric clinic; the postal system; commercial banks; and the law on medals and awards". P.TREANOR:P2536, para.258.

⁸⁶³ D405; P3051; P2627.

⁸⁶⁴ P3077; P3051.

⁸⁶⁵ D405; D406.

⁸⁶⁶ P3051.

⁸⁶⁷ D406.

⁸⁶⁸ D406, p.2.

⁸⁶⁹ P3051.

⁸⁷⁰ P3078.

defence forces and political operations⁸⁷² (or "harmonis[ing] the use of the TO together with the JNA");⁸⁷³ creating a city TO staff;⁸⁷⁴ addressing Europe about the situation in Bosnia;⁸⁷⁵ and informing the Assembly about the political and war situation.⁸⁷⁶ As ĐERIĆ stated, the NSC decisions "were given to Karadžić. They were in Karadžić's hands."⁸⁷⁷

257. After its establishment on 12 May 1992, the Presidency effectively replaced the NSC. The last reported meeting of the NSC took place on 15 May 1992.⁸⁷⁸

(e) Presidency

258. The President of the Republic was the most powerful position in the RS. The President was the Supreme Commander of the Army.⁸⁷⁹ MLADIĆ commanded the VRS only in conformity with the authority delegated to him by the President.⁸⁸⁰ During a state of imminent threat of war,⁸⁸¹ the President was the Supreme Commander of the RS armed forces, which included the RSMUP.⁸⁸²

259. The President's powers further included: to represent the Republic,⁸⁸³ to nominate the President of the Government,⁸⁸⁴ to promulgate laws by decree,⁸⁸⁵ and to perform other duties in conformity with the Constitution.⁸⁸⁶ During a state of war or imminent threat of war, the President could make enactments on issues within the competence of the Assembly.⁸⁸⁷

⁸⁷¹ P2627. *See also* D.HANSON:T.14558.

⁸⁷² P3051.

⁸⁷³ R.THEUNENS:T.16888-16889.

⁸⁷⁴ P1087.

⁸⁷⁵ D405.

⁸⁷⁶ D409.

⁸⁷⁷ B.ĐERIĆ:P4982,p.17.

⁸⁷⁸ P.TREANOR:P2536,para.261. *See also* AF2051.

⁸⁷⁹ P5416,Arts.1-3; P5578,Art.106. *See further* III.C.8.(i).(iii): **KARADŽIĆ's** command and control authority over the VRS.

⁸⁸⁰ P2603,Art.175.

⁸⁸¹ The acting presidents declared a state of imminent threat of war on 15 April 1992. P3922.

⁸⁸² P2602,Art.7; P2964,Art.33. *See also* P2964,Art.25; M.MILOVANOVIĆ:T.25444-25445; P6510,p.14.

⁸⁸³ P5578,Arts.69,80.

⁸⁸⁴ P5578,Art.80.

⁸⁸⁵ P5578,Art.80.

⁸⁸⁶ P5578,Art.80.

⁸⁸⁷ P5578,Art.81.

260. During most of 1992, the RS did not have a single President. Rather, several interim collective bodies—including, most notably, the NSC⁸⁸⁸—performed the function of President until 17 December 1992. Prior to the conflict, although KOLJEVIĆ urged the selection of KARADŽIĆ as "the most obvious choice",⁸⁸⁹ the Assembly followed KARADŽIĆ's recommendation that it would be advantageous at that point to take advantage of KOLJEVIĆ and PLAVŠIĆ's seeming-electoral legitimacy as members of the SRBiH collective Presidency,⁸⁹⁰ and designated PLAVŠIĆ and KOLJEVIĆ "acting President[s]".⁸⁹¹ Between 27 March and 12 May 1992, the NSC performed the function of President, making decisions that the acting Presidents rubber-stamped.⁸⁹² As discussed above, on 12 May 1992, at the first Assembly session held after the full-scale outbreak of hostilities, KARADŽIĆ became a member of the newly-established three-person collective Presidency, with KOLJEVIĆ and PLAVŠIĆ,⁸⁹³ and was elected President of the Presidency.⁸⁹⁴ The three-member Presidency was expanded on 2 June 1992, when KRAJIŠNIK and ĐERIĆ joined the new War Presidency.⁸⁹⁵ The Presidency's expansion to five members had little impact on the actual power structure given KARADŽIĆ and KRAJIŠNIK's *de facto* roles as the paramount decision-makers and controlling authorities in RS.⁸⁹⁶

261. Of 37 sessions held between 12 May 1992 and 30 November 1992, KARADŽIĆ presided over all but four meetings.⁸⁹⁷ In addition to commanding the VRS⁸⁹⁸ and RSMUP⁸⁹⁹ the Presidency exercised control over municipal authorities.⁹⁰⁰ As ĐERIĆ confirmed at a 14 September 1992 Government and Presidency meeting, "the Presidency controls the Army, Police and the Party".⁹⁰¹ The Presidency assigned

⁸⁸⁸ See above III.C.8.(d): National Security Council (NSC).

⁸⁸⁹ D89,p.10.

⁸⁹⁰ D89,p.9.

⁸⁹¹ D89,pp.9-10; P961,p.24; P.TREANOR:P2536,para.236.

⁸⁹² P.TREANOR:P2536,para.259.

⁸⁹³ P1355,p.2.

⁸⁹⁴ P3032.

⁸⁹⁵ P.TREANOR:P2536,paras.184,236.

⁸⁹⁶ B.ĐERIĆ:P4282,pp.17-19; B.ĐERIĆ:T.27952; R.NEŠKOVIĆ:P2568,p.21; P1387,p.46.

⁸⁹⁷ KARADŽIĆ was absent for those four meetings. See P.TREANOR:P2536,p.186.

⁸⁹⁸ P1504; D440,p.3; P1467,p.2; P3076; P3036; R.THEUNENS:P3033,pp.298-301,500-582. See III.C.8.(i).(iii): KARADŽIĆ's command and control authority over the VRS.

⁸⁹⁹ P.TREANOR:P2536,paras.267-279; P3051,p.3.

⁹⁰⁰ P3077,p.1; P2717; D406; P3051; P2611; D1228.

⁹⁰¹ D1356,p.1.

KARADŽIĆ responsibility for "military issues".⁹⁰² As President of the Presidency and later President, **KARADŽIĆ** received daily reports from the field, including MUP and VRS reports.⁹⁰³

262. As noted above, during a state of war or imminent threat of war, the President could make enactments on issues within the competence of the Assembly, subject to the obligation to submit these enactments to the Assembly for confirmation as soon as possible.⁹⁰⁴ **KARADŽIĆ** and the Presidency made extensive use of this power, making enactments on numerous issues⁹⁰⁵ including crucial laws⁹⁰⁶ and important appointments.⁹⁰⁷ When these enactments were submitted to the Assembly for approval, virtually all were confirmed without substantive discussion.⁹⁰⁸

263. On 17 December 1992, the Assembly terminated the War Presidency and elected **KARADŽIĆ** as RS President,⁹⁰⁹ with KOLJEVIĆ and PLAVŠIĆ as vice-Presidents. The position and powers of the President largely remained unchanged after the end of 1992.

(f) Assembly

264. The RS Assembly, the first of the RS's formal parallel organs, was "the central body and the moving force behind all the other [RS] institutions" so that "the entire political system and the entire institutional structure [was] the baby of that Assembly".⁹¹⁰ Between its establishment in autumn 1991 and the founding of the Bosnian Serb Republic in January 1992, the Assembly "prepared the means and conditions for the establishment of entirely separate structures for 'the Serbian people

⁹⁰² D440.

⁹⁰³ R.BUTLER:T.27505; P3054; P4457; P4464; P2242; P2987; P4932; P4933; P5137; R.THEUNENS:P3033,pp.546-551; P2753; P2754; R.KEZUNOVIĆ:T.14963-14967; C.NIELSEN:T.16270-16272; C.NIELSEN:P2958,paras.236,389; P3051,p.2; P2761,pp.22-23; P1478,p.126.

⁹⁰⁴ P5578,Art.81.

⁹⁰⁵ P3036.

⁹⁰⁶ P2602; P2603.

⁹⁰⁷ P3051,p.3; P1087,p.2.

⁹⁰⁸ P1355,p.3; D92,pp.95-96; D456,pp.107-121.

⁹⁰⁹ P.TREANOR:P2536,paras.265-266.

⁹¹⁰ R.NEŠKOVIĆ:P2568,pp.189-190.

of BH,' and ultimately a separate Republic".⁹¹¹ From the beginning, the Assembly was inextricably linked to the SDS and **KARADŽIĆ**.

265. On 15 October 1991, in the immediate aftermath of the SRBiH parliament's adoption of the memorandum on independence, the SDS Party Council met and decided to establish the Assembly.⁹¹² The SDS Deputies' Club confirmed the decision three days later.⁹¹³

266. When formed, the Assembly was a barely reconstituted version of the SDS Deputies' Club.⁹¹⁴ Its founding session opened as a meeting of the SDS Deputies' Club before the unanimous decision to establish the separate Assembly.⁹¹⁵ In a conversation between **KARADŽIĆ** and **MILOŠEVIĆ** on the day of that founding session, even **MILOŠEVIĆ** recognised the Assembly for what it was: a "delegates' club" basically composed of members of one party.⁹¹⁶

267. Most Assembly sessions were preceded by a Deputies' Club session, at which the Assembly agenda items were prepared, discussed and common positions adopted.⁹¹⁷ Though Serbs from other parties caucused with the Deputies' Club,⁹¹⁸ this did not erode the Deputies' Club's unity of action at Assembly meetings. According to a non-SDS deputy, deputies were told during a Deputies' Club meeting in 1994 that all deputies from all parties were "bound by the views of the deputies' club".⁹¹⁹

268. Contrary to **KRAJIŠNIK**'s attempts to depict the Assembly otherwise,⁹²⁰ the evidence shows that the legislative body "was not only the creation but also the creature of the SDS".⁹²¹ This is reflected in the many conclusions, decisions and laws that were adopted unanimously and without discussion; at the first session, for example, not a single issue was discussed in any detail.⁹²² As a deputy noted in 1994:

⁹¹¹ P.TREANOR:P2536,para.168.

⁹¹² D294. *See also* P2536,para.164.

⁹¹³ P2581.

⁹¹⁴ P.TREANOR:P2536,paras.46-47,165.

⁹¹⁵ P1342,p.3.

⁹¹⁶ P2546,p.5.

⁹¹⁷ D88,p.72; D92,p.54. *See also* P1343.

⁹¹⁸ *See* P.TREANOR:P2536,pp.151-152.

⁹¹⁹ P1405,p.18. *See also* P.TREANOR:P2537,para.44.

⁹²⁰ M.KRAJIŠNIK:T.43359-43365.

⁹²¹ P.TREANOR:P2536,para.170.

⁹²² P1343.

in these two years, my memory has not yet registered a case when the whole assembly of esteemed people's deputies has stood up against something that our political and state leadership strictly targeted as something that has to be respected.⁹²³

269. Although **KARADŽIĆ** was not formally a member of the Assembly, as SDS President and then RS President, he attended and was the key speaker at virtually all Assembly sessions; he explained policy and issued instructions and directions. His authority as SDS leader was apparent in the Assembly. As a deputy once noted (in the context of an anticipated regional assembly), "I know that **KARADŽIĆ**, as the President of the SDS, is truly the leading figure among the Serbian people. And five of his sentences are enough to change the entire course of the session."⁹²⁴

270. The Assembly was an important centralised forum for the promulgation of policy and instructions and their dissemination to the field. As **KRAJIŠNIK** said during one session, "[w]e have seen that the people were leaving Assembly sessions with a clear vision of what they were supposed to do".⁹²⁵ At the Assembly (or Deputies' Club), **KARADŽIĆ** instructed the delegates about ethnic separation—for example, that no one could live with Muslims,⁹²⁶ that they would get instructions on taking control over municipalities,⁹²⁷ that the Bosnian Serbs ultimate goal was unification with Serbia,⁹²⁸ that certain areas needed to be clean,⁹²⁹ and that Muslims would not be permitted to move back into Serb areas.⁹³⁰

271. Deputies were expected to convey the information and instructions that they received to those in the municipalities⁹³¹ and they did so.⁹³² With deputies from 50 different municipalities,⁹³³ the Assembly network was important for exchanging information between the republic and the municipal level, explaining policy and disseminating instructions. As **KARADŽIĆ** explained, each deputy was to "explain our strategic goals and to explain our tactics [...] At the same time, he will report to

⁹²³ P5525,p.25.

⁹²⁴ D88,p.65. *See also* V.KUPREŠANIN:T.43486.

⁹²⁵ P1369,p.7.

⁹²⁶ P938,p.36.

⁹²⁷ P961,p.22.

⁹²⁸ P956,pp.9-10; D90,p.43.

⁹²⁹ P988,p.68.

⁹³⁰ P1385,pp.126-127,132; P988,p.29.

⁹³¹ P1351,p.58.

⁹³² *See e.g.* P3439,p.2; P6589; R.KALABIĆ:T.44577-44578; P3590,p.3; B.MANDIĆ:T.45774-45775.

⁹³³ P.TREANOR:P2536,pp.151-154,appendices4,5.

the Assembly here".⁹³⁴ As one noted, "[i]t is the MPs who are to transfer the authority of the Republic to the municipalities and from the municipalities here".⁹³⁵

272. At Assembly sessions and Deputies' Club meetings, deputies spoke in detail about issues in their municipalities, about which they were evidently well-informed.⁹³⁶ At the 16th Assembly on 12 May 1992, for example, deputies shared information about, among other things,⁹³⁷ (a) the need for "definitive [čišćenje—cleansing/mopping up]" of territory;⁹³⁸ (b) the need for **KARADŽIĆ** and **KRAJIŠNIK** to promote the "conquests that are currently necessary";⁹³⁹ and (c) the fact that Muslims had been "evacuated" from the right bank of the Una and would not be allowed back in light of the fourth strategic objective.⁹⁴⁰ At the 17th RS Assembly Session in July, information shared included: (a) that there was a huge problem with the thousands of "captured people of other nationalities";⁹⁴¹ (b) that the Muslims were people "whose executioners we are to be";⁹⁴² (c) that the number of Muslims in Birač had hopefully been "halved";⁹⁴³ and (d) that **KARADŽIĆ**'s encouragement in Sarajevo had resulted in Serbs driving Muslims "out of the territories where they had actually been majority."⁹⁴⁴

273. The implementation of **KARADŽIĆ**'s policies was further assured by the obligation upon municipal assemblies to follow the republic-level Assembly:⁹⁴⁵ "This Assembly is the supreme power of the Serbian people [...] This Assembly has the authority to cancel all decisions of any Serbian Assembly in BH".⁹⁴⁶ This was understood by deputies. As **KUPREŠANIN** said, "this Assembly [...] is our supreme authority because it can annul all our decisions".⁹⁴⁷ The Assembly was thus an

⁹³⁴ P1351,p.58.

⁹³⁵ D92,p.59.

⁹³⁶ M.MANDIĆ:C2,pp.468,620-621. *See e.g.* D92,pp.30-31,47,60,66-67,72-74,83.

⁹³⁷ *See* P956,pp.12-13,15,16,20,24-26,44.

⁹³⁸ P956,p.12.

⁹³⁹ P956,p.13.

⁹⁴⁰ P956,pp.20-21.

⁹⁴¹ D92,p.32.

⁹⁴² D92,p.41(emphasis added).

⁹⁴³ D92,p.73.

⁹⁴⁴ D92,p.66.

⁹⁴⁵ D84,p.29.

⁹⁴⁶ D88,p.45.

⁹⁴⁷ D88,p.61.

important mechanism through which **KARADŽIĆ** and other JCE members formalised, disseminated and monitored their policies.⁹⁴⁸

(g) CSs/War Presidencies/War Commissions

274. CSs were key organs used by **KARADŽIĆ** and other JCE members at the regional and municipal level to take over power in claimed municipalities and implement the common purpose. CSs implemented the common criminal purpose by coordinating Serb Forces in effecting persecutory and—in some municipalities—genocidal measures against the Muslim and Croat populations, including organising and supporting disarming operations, detentions and expulsions, and imposing restrictive and discriminatory measures.

275. As discussed above, **KARADŽIĆ** initiated the effort to establish municipal CSs in late 1991 and early 1992 pursuant to Variant A/B.⁹⁴⁹ In the build-up to the takeovers, **KARADŽIĆ** activated the second level of Variant A/B on 14 February 1992,⁹⁵⁰ and announced on 24 March 1992, that "very soon, we can form whatever we want" and the Serbian municipalities will "assume control of the entire territory of the municipality concerned" using "a single method".⁹⁵¹ During this period and in accordance with **KARADŽIĆ**'s instructions, Serb authorities in Serb-claimed municipalities throughout BiH prepared for the takeovers, including by establishing parallel Serb municipal organs,⁹⁵² arming the Serb population,⁹⁵³ liaising with the JNA,⁹⁵⁴ and preparing for the separation of the police force.⁹⁵⁵

276. Municipality takeovers involved establishing Serb CSs as the pre-eminent political authorities in the municipalities. In many cases, this was simply a case of the

⁹⁴⁸ See e.g. P1355.

⁹⁴⁹ See III.C.2: Variant A/B.

⁹⁵⁰ P12,pp.5-7,17,24; **Bratunac**:P2597; **Prijedor**:P5516.

⁹⁵¹ P961,p.22.

⁹⁵² See Municipality Summaries.

⁹⁵³ See Municipality Summaries.

⁹⁵⁴ **Brčko**:D.RISTANIĆ:P3023,paras.75-76; **Bratunac**:P2597; **Foča**:P5481; **Hadžići**:AF2562; **Ključ**: [REDACTED]; P3432,pp.3-5, discussed by A.EGRLIĆ:P6586,pp.100-102; [REDACTED] **Novi Grad**:P979,pp.1,6,11; R.MUJKIĆ:P2314,paras.12-13; **Novo Sarajevo**:KDZ310:T.9169; KDZ310:P1938,para.10; P5844; **Prijedor**:P2630,pp.1,5-7; **Rogatica**:P2830,p.2; A.DŽAMBASOVIĆ:P2828,paras.28,58,66,76-77,83; **Sanski Most**:B.TADIĆ:T.44433-44434; [REDACTED]; [REDACTED] **Sokolac**:A.DŽAMBASOVIĆ:P2828,paras.76-77,79-80; **Vlasenica**:D1653; I.REDŽIĆ:P3189,pp.13-14; A.DŽAMBASOVIĆ:P2828,paras.55-56; **Zvornik**:P2590.

existing Serb CS—established pursuant to Variant A/B—asserting itself as the new municipal authority.⁹⁵⁶ By 26 April 1992, the CSs were recognised by the Government as formal bodies of the Bosnian Serb state that in wartime conditions "take over all the prerogatives and functions of municipal assemblies, when they are not in a position to meet."⁹⁵⁷

277. Following the takeovers, the CSs coordinated and/or controlled events on the ground. In early June 1992, **KARADŽIĆ** further formalised and centralised the governance of the Serbian municipalities by replacing CSs with War Presidencies and War Commissions as municipal authorities with explicit links to the republican Presidency through the War Commissioner.⁹⁵⁸

278. In November 1994, **KARADŽIĆ** reminded the Assembly that:

[...] before the war [...] [n]ot everything was as clear as day in the municipalities where we were majority and in those where we were minority. Do you remember the Instruction A and Instruction B? We had Crisis Staffs, and it was clear that they were the authority. They could make mistakes but they still were the authority. The people were not left without the authority because there was a Crisis Staff.⁹⁵⁹

(i) CSs coordinated local Serb Forces

279. In addition to civilian leaders, CSs included high-ranking police and military officers.⁹⁶⁰ For example, the Sanski Most CS included the 6th Brigade Commander, the Serbian TO Commander, the Chief of Police, and the President of the municipal

⁹⁵⁵ **Brčko**:Đ.RISTANIĆ:P3023,para.45; **Bijeljina**:P1083,pp.1-2; **Bratunac**:P2597,p.1; P3199,pp.6-7; **Ključ**:A.DŽAFIĆ:P3488,paras.54-65; P3438,p.2; **Prijedor**:P2968,pp.2,14; P5528,p.2; **Sokolac**:P6089,p.2; M.MANDIĆ:T.4889-4890.

⁹⁵⁶ See Municipality Summaries.

⁹⁵⁷ P2717,p.1.

⁹⁵⁸ See D.HANSON:P2589,paras.54-55. While these terms were not immediately nor consistently applied, the bodies carried out the same tasks. It is not necessary, nor always possible to draw distinctions between CSs, War Staffs, War Presidencies and War Commissions, and CS is used in this brief as an umbrella term for all of these emergency municipal authorities.

⁹⁵⁹ P1403,pp.347-348. See also P970,p.316.

⁹⁶⁰ See e.g. **ARK** CS, including JNA/VRS General TALIĆ and Banja Luka CSB Chief ŽUPLJANIN:P6; **Sanski Most** CS, including TO Commander ANIČIĆ, SJB Chief VRUČINIĆ and JNA 6th Brigade Commander BASARA:P2614; **Rogatica** CS, which included SDS President VESELINOVIĆ and Rogatica Brigade Commander KUŠIĆ and Chief of Staff UJIĆ:AF2497; P2835,p.1; M.UJIĆ:T.33451; **Novo Sarajevo** CS, including TO representatives:R.NEŠKOVIĆ:P2568,p.121. See also D2674; **Zvornik**:M.DAVIDOVIĆ:T.15536; **Iliđža**:R.KEZUNOVIĆ:P2526,para.56; N.PRSTOJEVIĆ:T.12957-12958; **Vogošća**: N.POPLAŠEN:D4027,para.5; **Vlasenica**: [REDACTED]

assembly Deputies' Club, and its Deputy President was responsible for "the realization of the ideas of the leadership of the SDS on the level of the Republic, the region, and the municipality".⁹⁶¹

280. CSs played a crucial role in cooperating with and coordinating local Serb Forces, including TO, MUP, JNA and paramilitaries in municipality takeovers and military operations to seize and cleanse Serb-claimed territories.⁹⁶² [REDACTED]

[REDACTED]

281. CS members were kept well informed of military developments. For example, ARK CS members, including ARK CS President BRĐANIN, visited frontlines regularly and were briefed by military personnel, following which they briefed the ARK CS on the military campaign.⁹⁶⁴ Military representatives attended CS meetings.⁹⁶⁵ Some CS members wore military uniforms and carried weapons.⁹⁶⁶ CSs provided payment and/or logistical support to the VRS, TO and paramilitary forces conducting the operations.⁹⁶⁷ Some CSs had "Commander[s]"⁹⁶⁸ which, according to Defence witness Kosta ČAVOŠKI, shows they "had the character of a military staff to a certain degree."⁹⁶⁹

282. Indeed, in some municipalities in the early phases, the CS President himself led military operations. Foča's CS President STANIĆ described himself as the "first

⁹⁶¹ D.HANSON:P2589,para.58; P2614; P3329,pp.10-13.

⁹⁶² D.HANSON:P2589,paras.56-58,66,76-83; D325,pp.10,13. *See e.g.* Foča:P3476,p.3; Sanski Most:P3329,pp.12-13; Zvornik:P313; Vlasenica:P2636; P6140; Hadžići:T.GLAVAŠ:P2296,paras.37,61; T.GLAVAŠ:T.11782-11783(same); Prijedor:D470,p.28; Novi Grad:P2329; P1505; Vogošća:P2635. *See further* Municipality Summaries.

⁹⁶³ [REDACTED]

⁹⁶⁴ AF548; R.BRĐANIN:D4034,para.38; P6512.

⁹⁶⁵ *See e.g.* Ključ:P2643,p.3; Zvornik:KW317:T.39341-39344; ARK:P6438; Sanski Most:[REDACTED].

⁹⁶⁶ Ključ:P3452; R.KALABIĆ:T.44572-44573; R.KALABIĆ:P6550,p.5; P3429.

⁹⁶⁷ D.HANSON:P2589,paras.75,85. *See e.g.* Ključ:P2643,pp.5-6; P3455; P3452,p.1;

Zvornik:J.IVANOVIĆ:T.39867; [REDACTED]; P2913; [REDACTED]; M.DAVIDOVIĆ:T.15488-15497; P2859; P2860; P3382; P159; P158; P2870; P3157; P2634; P2862; P2863; P2912; P2872; P5434; P5435; P2865; P3383; P2864; [REDACTED]; KW317:T.39357-39358; P2867; P2634; P5542; Vogošća:P2909; P2373; S.STANIĆ:T.31702-31703; P2635.

⁹⁶⁸ Foča:P3476,p.3; Ilidža:P5705; Vogošća:P968; P5737.

war commander" when detailing how "we managed to liberate the whole of the Foča municipality".⁹⁷⁰ In Ilidža, PRSTOJEVIĆ's active involvement in military operations eventually resulted in tensions with the VRS.⁹⁷¹ Bratunac CS President Miroslav DERONJIĆ ordered the attack on Glogova.⁹⁷²

283. Contrary to Defence contentions that chaos and disorganisation ensued following the Serb takeovers,⁹⁷³ the evidence shows municipalities controlled by functioning authorities,⁹⁷⁴ in which the civilian and military leadership cooperated and coordinated in their shared goals.⁹⁷⁵ In Ključ, for example, the CS recorded the regular participation of VRS representatives in CS sessions, and described the period from May to July 1992 as "one of very successful cooperation between the Crisis Staff and military organs in crushing armed resistance by Muslim extremists".⁹⁷⁶

(ii) CSs organised and supported disarming operations

284. CSs played a coordinating role in disarming operations which took place following Serb takeovers.⁹⁷⁷ In Sanski Most, for example, on 20 May 1992, the CS ordered the TO to prepare a disarmament operation,⁹⁷⁸ which was then carried out by

⁹⁶⁹ K.ČAVOŠKI:T.37095.

⁹⁷⁰ P3476,pp.2-3. *See also* D1684; KDZ379:P3332,pp.24-26,70-71; KDZ379:T.18885.

⁹⁷¹ P1478,p.388.

⁹⁷² M.KATANIĆ:P4374,para.29; M.KATANIĆ:T.24536-24537.

⁹⁷³ *See e.g.* Foča:R.MLAĐENović:D3314,paras.20,25; Ključ:M.ADAMOVIĆ:T.44479-44480; Zvornik:B.GRUJIĆ:D3724,para.39; J.IVANOVIĆ:D3692,paras.24-28; Č.ZELENOVIĆ:D3723,paras.28-30; Č.ZELENOVIĆ:T.40318-40319.

⁹⁷⁴ *See e.g.* Brčko:Đ.RISTANIĆ:P3023,paras.80-82; Ključ:P2643,p.2; P5411; Sanski Most: [REDACTED]; Foča:D3319; D1690; P3338; P4986; M.KRNOJELAC:D2716,pp.221-224; P6265,p.6; KDZ379:T.18835-18836; P4986; Prijedor:P3536,pp.1-6,42; P3529; M.MUJADŽIĆ:P3703,pp.110-112,146-147,159-167; P2915; D4468,p.8; P2637; Vlasenica:P2636; P2615; ARK:D4038.

⁹⁷⁵ *See e.g.* Brčko:Đ.RISTANIĆ:P3023,paras.75-76,162; P2888,p.2; Ključ:P2643,p.3; P2606,p.3; Sanski Most:P3328; P3645; P3644; P3329,p.26; P6554,pp.2-4; Vlasenica:D3101; M.ĐURIĆ:D3093,paras.10-11; P3055; P3240; Zvornik:P3390,pp.37,40,43; P314.

⁹⁷⁶ P2643,p.3.

⁹⁷⁷ D.HANSON:P2589,para.91; E.BROWN:P3914,paras.2.10-2.21; C.NIELSEN:P2958,paras.200-203; Sanski Most:P3328; P3644; [REDACTED]; P3928; P723,pp.1-2; ARK:AF535; AF537; R.BRDANIN:D4034,paras.42,44; D470,p.27; P2818,p.1; P3694; P3475; P3925; D4178,p.19; D1542; D1536,p.4; Ključ:P3439,pp.1-2; Bosanski Novi:D1921,p.3; P2632,pp.2-4; Rogatica:AF2502; AF2499; [REDACTED]; Foča:AF776-AF778; Hadžići:T.GLAVAŠ:P2296,paras.37-38,40-41; T.GLAVAŠ:T.11787; Vlasenica:P3215; P6138; M.ĐURIĆ(KW117):D3093,paras.23-26; M.ĐURIĆ(KW117):T.35062-35063; M.ĐURIĆ(KW117): [REDACTED]; Bratunac:P4377.

⁹⁷⁸ P3647,p.2.

TO, 6th Brigade, SJB and local paramilitary forces.⁹⁷⁹ CS President RAŠULA ordered "[c]aptured civilians to be used for exchanges" and made clear that all those found with weapons should be killed.⁹⁸⁰

285. The disarmament was discriminatory; only non-Serbs were disarmed.⁹⁸¹ These operations were often a pretext for wholesale cleansing operations, in which civilians were rounded up *en masse*, and large-scale detentions and massive expulsions ensued.⁹⁸²

(iii) CSs organised and supported detentions

286. The CSs established, organised and controlled detention facilities⁹⁸³ in which detainees were held in substandard and typically brutal conditions, where beatings were routine and many detainees were killed. CSs arranged for the SJB to secure facilities,⁹⁸⁴ appointed personnel—including wardens and interrogators—to the facilities,⁹⁸⁵ and provided them with logistical support.⁹⁸⁶ They received reports on detentions and the treatment of prisoners,⁹⁸⁷ and visited the facilities.⁹⁸⁸ For example,

⁹⁷⁹ P3313.

⁹⁸⁰ P3329,p.33; [REDACTED]; P3635,p.18.

⁹⁸¹ See e.g. **ARK**:AF538; C.KIRUDJA:P3804,para.53; M.SAJIĆ:T.44137-44138;

Prijedor:P.RADIĆ:P3,pp.45-46; [REDACTED]; M.KVOČKA:T45622-45623; S.SRDIĆ:D2265,p.28; **Sanski Most**: [REDACTED];

[REDACTED]; [REDACTED]; P3928; P723,pp.1-2;

KDZ052:P3370,pp.9-11; P725; R.BEGIĆ:P691,pp.9-10; **Bosanski Novi**:R.PAŠIĆ:T.41018-41021;

Bratunac:M.KATANIĆ:P4374,para.24; M.TALOVIĆ:P3188,para.14; S.DŽAFIĆ:P3263,para.10;

Ključ:AF919; P3444; **Sokolac**:M.TUPAJIĆ:P5238,pp.54-55,84; P3296; D1667,p.1;

Vlasenica:AF2693; I.OSMANOVIĆ:P3212,paras.27-28; Z.JOVANOVIĆ:D3007,para.21; P6138;

Vogošća:KDZ020:P2345,para.68.

⁹⁸² See Municipality Summaries; III.C.8.(h).(ii): RSMUP role in municipality takeovers and operations to permanently remove non-Serbs.

⁹⁸³ D.HANSON:P2589,para.96,fn.154; C.NIELSEN:P2958,paras.285,296-297,307,315-316;

Vogošća:S.AVLJAŠ:T.35159-35162,35165; **Prijedor**:D470,p.2; P2640; P2741; P2915,p.3;

S.SRDIĆ:D2265,p.22; **Sanski Most**:D470,p.7; [REDACTED]; P3329,pp.32-33;

[REDACTED]; **Foča**:P3341; P3342; **Hadžići**:AF2615;

T.GLAVAŠ:P2296,paras.26,46; V.BANDUKA:D2915,para.54; **Zvornik**:KW317:T.39367; **Bosanski Novi**:D1921,pp.2,4.

⁹⁸⁴ See e.g. **Prijedor**:P2640; D470,pp.6,29-30; **Hadžići**:T.GLAVAŠ:P2296,paras.26,48,50;

T.GLAVAŠ:T.11784-11785; M.TOLJ:T.34637,34639; P1607,p.10; **Sanski Most**:D470,p.8;

Prijedor:D470,p.27; **ARK**:P1096.

⁹⁸⁵ See e.g. **Foča**:M.KRNOJELAC:D2716,pp.56-57; M.RAŠEVIĆ:T.46775;

R.MLAĐENOVIĆ:D3314,para.48; P3340; P6268; **Sanski Most**: [REDACTED]

P2639; [REDACTED] P3635,p.4.

⁹⁸⁶ **Prijedor**:M.STAKIĆ:D4195,para.49; **Vlasenica**: [REDACTED]

Foča:R.MLAĐENOVIĆ:D3314,para.48.

⁹⁸⁷ See e.g. **Ključ**:P2606,pp.9,11,14; **Foča**:P6195; **Vlasenica**: [REDACTED]

[REDACTED]; **Sanski Most**:P3635,pp.4-7; [REDACTED]

on 15 July 1992, ARK CS members including CSB Banja Luka chief ŽUPLJANIN toured Prijedor's "collection centres", following which BRĐANIN praised the authorities for "a job well done".⁹⁸⁹ In some instances the CS offices were located in the same building as or very nearby detention facilities.⁹⁹⁰ Defence witness Slobodan AVLIJAŠ met with Vogošća CS members at a cafe "right next to" the Vogošća bunker where AVLIJAŠ observed that detainees were held in "truly horrific" conditions under CS and army authority.⁹⁹¹ In addition to running many detention centres in close collaboration with the SJB, the CSs liaised with the VRS in the operation of those centres under military authority.⁹⁹²

287. CSs also oversaw arrests, transfers between, and releases from detention centres. They ordered arrests of individuals and categories of non-Serbs including civilians.⁹⁹³ They authorised the transfer of prisoners in and out of detention centres;⁹⁹⁴ in Sanski Most, for example, those ordered to Manjača Camp by the CS included politicians and "people unwelcome in Sanksi Most municipality".⁹⁹⁵ CSs organised transport to detention centres.⁹⁹⁶ They ordered or forbade the release of individuals or categories of prisoners from camps and prisons;⁹⁹⁷ the Prijedor CS, for

Prijedor:S.SRDIĆ:D2265,pp.34-35; [REDACTED];
M.STAKIĆ:T.45249-45250.

⁹⁸⁸ **Brčko:**Đ.RISTANIĆ:T.16719,16721-16722; **Zvornik:**AF2758; [REDACTED];
[REDACTED]; AF1135; P.RADIĆ:P2,pp.29-30,34; [REDACTED];
[REDACTED]; K.MESANOVIĆ:P3528,para.57; S.MIŠKOVIĆ:P6590,p.2.

⁹⁸⁹ P11,p.2;P.RADIĆ:P1,pp.79-80.

⁹⁹⁰ **Hadžići:**T.GLAVAŠ:T.11789-11792; V.BANDUKA:T.33518; **Zvornik:**AF2757;
[REDACTED]; [REDACTED].

⁹⁹¹ S.AVLIJAŠ:T.35159-35162,35165.

⁹⁹² See **Banja Luka:** A.ZULIĆ:P718,para.128; P3327; P3669;

Foča:M.KRNOJELAC:D2716,pp.104,389-396; AF837; P3346; **Rogatica:**AF2497;
Š.HURKO:P3267,para.44; Š.HURKO:T.18238-18242. See also A.ISAKOVIĆ:P128,p.5;

Bijeljina:[REDACTED]; M.DAVIDOVIĆ:T.15782-15785.

⁹⁹³ P1096,p.3; **Sanski Most:**P3329,p.32; D470,p.7; P3315,p.2. See also

Vogošća:S.AVLIJAŠ:T.35159-35165.

⁹⁹⁴ D.HANSON:P2589,para.96,fn.157; **Prijedor:**D470,pp.3-4; **Sanski Most:**D470,p.8; P2639;
[REDACTED]; [REDACTED];

Hadžići:T.GLAVAŠ:P2296,para.50; T.GLAVAŠ:T.11785-11786; M.MUSIĆ:P2403,paras.65-69;

Vlasenica:AF2709; [REDACTED].

⁹⁹⁵ P2639.

⁹⁹⁶ See e.g. **Zvornik:**M.VASILIC:T.39944-39945; P3186; [REDACTED]; **Sanski Most:**V.NIKOLIĆ:T.45445; P6554,p.3 .

⁹⁹⁷ D.HANSON:P2589,para.96,fn.159; **Sanski Most:**D4108; P5444; **Vogošća:**P2368; P2391;
Foča:P3344; P5540; P5539; P5526; AF837; P3346; D3318; M.KRNOJELAC:D2716,pp.104,389-396;
Brčko:P3025; P3026; Đ.RISTANIĆ:T.16716-16718; P.KAURINOVIĆ:T.34137-34141;
P.KAURINOVIĆ:P6147,pp.2-3; **Prijedor:**P2915,p.3.

example, forbade the release of individuals from Trnopolje, Keraterm and Omarska⁹⁹⁸ but ordered the release of "[a]ll Serbs who have been imprisoned by mistake".⁹⁹⁹

288. Detentions and exchanges were carried out with republic-level oversight.¹⁰⁰⁰ For example, as discussed above, before 400 detainees were transferred from Bratunac,¹⁰⁰¹ the Bratunac CS—through DERONJIĆ's personal contacts—had sought advice from the "highest level" or "top echelon" of the civilian and military authorities in Pale about how to handle the situation. RS officials in Pale gave "permission" for the detainees to be evacuated from the sports hall and transferred to Pale for exchange, and facilitated the exchange itself.¹⁰⁰² Similarly, at a 2 June meeting between KARADŽIĆ, MLADIĆ and members of the ARK civilian and military leadership,¹⁰⁰³ BRĐANIN spoke of the "Problem of the Krajina: 14,500 Muslims" and asked "About prisoners and refugees?—A position please at the highest level."¹⁰⁰⁴

(iv) CSs organised and supported expulsions

289. The civilian authorities also oversaw the large-scale expulsion of non-Serbs from the municipalities by TO, police, VRS and paramilitary units.¹⁰⁰⁵ CSs requested that the Army "round up or capture as many Muslim civilians as possible"¹⁰⁰⁶ and directed the moving out of civilians.¹⁰⁰⁷ They organised convoys to facilitate expulsions, arranging buses, trucks and police escorts.¹⁰⁰⁸ As ANDRIĆ stated, "[t]he moving out of the Muslim population must be organised and co-ordinated with the municipalities through which the moving is carried out."¹⁰⁰⁹

⁹⁹⁸ P2915,p.3.

⁹⁹⁹ P2741.

¹⁰⁰⁰ P1090. *See also* M.MANDIĆ:C2,pp.45-48,318-319; M.MANDIĆ:T.4569,4604; P1098,pp.4-5.

¹⁰⁰¹ *See* Bratunac Summary.

¹⁰⁰² L.SIMIĆ:T.37294-37297.

¹⁰⁰³ P1478,p.53; R.BRĐANIN:T.43680-43682.

¹⁰⁰⁴ P1478,pp.55-56.

¹⁰⁰⁵ D.HANSON:P2589,paras.99-100; **Bijeljina**:M.DAVIDOVIĆ:P2848,paras.150-154; **Pale**:P5429; P5428; P5523,pp.4-5; P5090; P5524; P736; P735; P737; P738; D34; **Ilidža**: [REDACTED]; **Zvornik**:P3055; **Sanski Most**:P2614; [REDACTED]; **Ključ**:P2606,pp.3,10,14,15.

¹⁰⁰⁶ P1096,p.3.

¹⁰⁰⁷ **Bosanski Novi**:D470,p.10; *see* Bosanski Novi Summary; **Sanski Most**:P3851;

Zvornik:P1478,pp.249,253-254; P2886.

¹⁰⁰⁸ D.HANSON:P2589,para.101. *See e.g.* **Bosanski Novi**:D470,pp.9,10; **Zvornik**:P2916; **Sanski Most**:P2732,p.1; V.NIKOLIĆ:T.45445; **Foča**:P2642.

¹⁰⁰⁹ P3055.

290. In effecting the forcible expulsions, the municipal authorities were following the SDS's policy "to displace the Muslims from the territory of Republika Srpska in an organised, planned and systematic fashion";¹⁰¹⁰ "[t]he [CS] did nothing more or other than putting in place the instructions they had been given. It's not a coincidence; it was a rule."¹⁰¹¹

291. Moreover, CSs attempted to ensure that Muslims and Croats who had been forcibly transferred from their municipalities could not return.¹⁰¹² Non-Serbs were required to provide statements declaring that they were voluntarily and/or permanently leaving and assigning their property rights to Serb authorities or Serb owners.¹⁰¹³ Serbs were settled into cleansed villages.¹⁰¹⁴ In some instances, the authorities restricted the amount of money or goods that those leaving could take out of the municipality.¹⁰¹⁵ In Ilidža PRSTOJEVIĆ banned the return of Muslims and Croats to the territory of Ilidža Serb Municipality, ostensibly for "security reasons" and because "the necessary conditions for their return do not exist."¹⁰¹⁶

292. CSs collected and redistributed non-Serbs' property,¹⁰¹⁷ declaring that "abandoned" property now belonged to the municipality.¹⁰¹⁸ Appropriation and redistribution quickly became regulated by the republic level. On 2 June KARADŽIĆ issued a decision providing that property of those who "left the territory" be appropriated by municipality authorities and "temporarily" used for RS needs,¹⁰¹⁹ while on the same date a RS Government decree provided for the establishment of a municipal commission to receive war booty, to be transferred to the RS's "emergency

¹⁰¹⁰ M.DAVIDOVIĆ:D1450,p.21.

¹⁰¹¹ M.DAVIDOVIĆ:T.15536-15537.

¹⁰¹² D.HANSON:P2589,para.103; **Ključ**:P2606,p.3; **Ilidža**:D1244.

¹⁰¹³ D.HANSON:P2589,paras.99-101; **Bosanski Novi**:Bosanski Novi Summary; D1921,p.4; **Sanski Most**:P3307; [REDACTED]; G.STOJIC:P3515,pp.12-13; G.STOJIC:T.19766-19767; P3517; P2732,p.1; A.ZULIĆ:P718,para.140; P2733; **Ključ**:P3462; P3472; P3463; P3573; A.ERGLIC:P6586,p.131; **Prijedor**:D470,pp.6-7; **Zvornik**:P2734; **Foča**:AF2410; **Pale**:P5429; P735; P738; D34; **Vlasenica**:I.OSMANOVIĆ:P3212,para.58; P3218; [REDACTED]; **Vogošća**:P2365; E.MURAČEVIĆ:P2361,p.20.

¹⁰¹⁴ P739; **Sanski Most**:P2733; **Zvornik**:P1478,pp.249-250,253-254; P.PANIĆ:T.19137;

Bijeljina:M.DAVIDOVIĆ:T.15824-15828; P2458,para.7; A.BANBURY:P2451,para.63;

[REDACTED]; **Hadžići**:D1084; P6167; **Bosanski**

Novi:C.KIRUDJA:P3804,para.51; **Ilidža**:S.MIJANOVIĆ:T.32396; D1241.

¹⁰¹⁵ D.HANSON:P2589,para.101; **ARK**:P3447; D1307; **Ključ**:P3447; **Foča**:P2642,p.1.

¹⁰¹⁶ D1244.

¹⁰¹⁷ D.HANSON:P2589,para.102,fn.179; **Prijedor**:P3536,pp.16-17,23,43; P2915;

B.MANDIĆ:T.45775-45780; **Sanski Most**:P3307; [REDACTED].

¹⁰¹⁸ D.HANSON:P2589,para.102. *See e.g.* **Zvornik**:P2910,p.16; **Prijedor**:B.MANDIĆ:T.45775;

Ključ:P3462.

reserves".¹⁰²⁰ This decision was implemented.¹⁰²¹ The requirement in Pale that non-Serbs not be permitted to leave the municipality until their property was "taken over in accordance with the regulations in force"¹⁰²² belies the Defence contention that "war booty" constituted property acquired "in combat".¹⁰²³

293. Similarly, **KARADŽIĆ**'s instructions to municipalities in the Sarajevo region to make an inventory of all housing left vacant following the "voluntary departure of Muslims", to be given for "temporary use" to Serbs,¹⁰²⁴ were implemented in Hadžići.¹⁰²⁵ The Defence contention that appropriation measures were aimed at protecting non-Serbs' property¹⁰²⁶ is not tenable in light of the transfer of appropriated property to the RS coffers, and to Serbs including refugees, families of VRS soldiers and VRS veterans.¹⁰²⁷ In any event, when Vladimir LUKIĆ was confronted with RS Government minutes ordering illegally-obtained property be collected and "used for the defence of the Republic"¹⁰²⁸ or "given to the Republican Commodity Reserves",¹⁰²⁹ he admitted his government was attempting to "make sure that the unlawfully acquired property is given over" for what he termed "the general good".¹⁰³⁰ Equally, claims that non-Serbs voluntarily left their property to Serbs for safekeeping made by Defence witnesses implicated in the theft of property¹⁰³¹ should be rejected.

(v) CSs imposed restrictive and discriminatory measures

294. Following the takeovers, CSs took control over municipal organs, implementing wide-ranging restrictive and discriminatory measures against non-Serbs. They ordered the dismissal of non-Serbs from municipal positions and from

¹⁰¹⁹ P2617,pp.2-3.

¹⁰²⁰ P6031. The Government subsequently issued instructions on implementation. P5502.

¹⁰²¹ P738/D2535(duplicates); D34; Z.ČVORO:T.30953-30954.

¹⁰²² P738.

¹⁰²³ Z.ČVORO:T.30978-30979.

¹⁰²⁴ P739.

¹⁰²⁵ **Hadžići**:P6167. *See also* D1084.

¹⁰²⁶ *See e.g.* **Prijedor**:B.MANDIĆ:T.45775-45776; **Pale**:Z.ČVORO:T.30950-30951;

Z.ČVORO:D2530,paras.7,15.

¹⁰²⁷ *See e.g.* D111; **Sanski Most**:P2733; **Prijedor**:P6606; B.MANDIĆ:T.45778-45779.

¹⁰²⁸ P3129,p.4.

¹⁰²⁹ P3141,p.12.

¹⁰³⁰ V.LUKIĆ:T.38771-38772.

¹⁰³¹ *See e.g.* **Sanski Most**:D.MUDRINIĆ:D4387,para.13; DCC:D.MUDRINIĆ.

certain firms or positions,¹⁰³² including court positions.¹⁰³³ This policy—sometimes referred to euphemistically as "balancing" or "differentiation of personnel"—resulted in the dismissals of Muslims from the police, postal services, hospitals, even positions such as music teachers.¹⁰³⁴ These "balancing instructions" came from the "higher authority" in Pale,¹⁰³⁵ and were then implemented across the entire RS.¹⁰³⁶

295. The Defence claim that dismissals were based on loyalty to the RS rather than ethnicity¹⁰³⁷ is undermined by a wealth of contemporaneous documents showing the targeting of Muslims and Croats *per se*,¹⁰³⁸ and even by the Defence's own witnesses. DODIK stated that "of course there were dismissals of non-Serbs"¹⁰³⁹ while ERCEG testified that while such steps "did not have to be taken", there were such dismissals in the ARK, claiming they were "motivated by reciprocity" following dismissals of Serbs in BiH.¹⁰⁴⁰

296. Other discriminatory measures taken by CSs included restricting non-Serbs' freedom of movement,¹⁰⁴¹ and taking actions to cut their access to public services.¹⁰⁴² CSs broadcast and disseminated propaganda against the Muslim and Croat populations.¹⁰⁴³ Non-Serbs who were permitted to remain in certain municipalities

¹⁰³² D.HANSON:P2589,para.98,fn.165; **ARK**:P7; **Prijedor**:P5470; P2740; **Ključ**:P2606,pp.2,15-18,21; P3587; P3464; D1348; D1349; P2643,p.5; [REDACTED]; **Vogošća**:P2635; **Pale**:S.CRNČALO:P733,para.58; **Sanski Most**:P3649; [REDACTED]; [REDACTED]; P2732; **Foča**:AF770-AF771.

¹⁰³³ D.HANSON:P2589,para.98,fn.168; **ARK**:D422,p.12; **Ključ**:P2606,p.24; P2643,pp.4-5; **Sanski Most**: AF2518; P3649; [REDACTED]; AF2519; **Banja Luka**:P6525; P5463; **Vlasenica, Bratunac, Zvornik**:D92,pp.72-73.

¹⁰³⁴ P.RADIĆ:P1,p.48.

¹⁰³⁵ P.RADIĆ:P1,pp.51,54.

¹⁰³⁶ P.RADIĆ:P1,p.53.

¹⁰³⁷ See e.g. R.BRĐANIN:D4034,para.15; **Prijedor**:B.MANDIĆ:D4229,para.28; B.MANDIĆ:T.45768.

¹⁰³⁸ **ARK**:P2740,p.2; **Bijeljina**:P2884,p.2; **Ključ**:P2606,pp.2,15; P3511/P3464(duplicates); P3490; P5411,p.1; **Prijedor**:P2637; B.MANDIĆ:T.45770; **Sokolac**:P6089,p.2.

¹⁰³⁹ M.DODIK:T.36902.

¹⁰⁴⁰ N.ERCEG:D4086,paras.99-100; N.ERCEG:T.44098.

¹⁰⁴¹ D.HANSON:P2589,para.98; **Iliđa**:D1233; **Foča**:AF766; AF772-AF773; AF775; **Pale**:AF2589; H.KARIĆ:P2839,paras.7-8,14-15; S.CRNČALO:T.1226; **Prijedor**:AF1097; AF1100; NusretSIVAC:T.19578-19579,19605; I.ATLIJA:P3672,pp.23-24; I.ATLIJA:T.20310-20311; S.SRDIĆ:D2265,p.22; KDZ038:P676,p.4; KDZ611:P4101,p.6; **Rogatica**: A.ISAKOVIĆ:P127,p.3; **Sanski Most**:AF2525; KDZ052:P3370,p.8; KDZ052:T.19092-19093; A.ZULIĆ:P718,paras.8-9,28; **Vlasenica**:P3217; AF2691.

¹⁰⁴² D.HANSON:P2589,para.98,fn.163; **Novo Sarajevo**:D885,p.3; **Pale**:P734.

¹⁰⁴³ D.HANSON:P2589,para.104; **Ključ**:P3442,p.5; **Sanski Most**:P5444; M.ORLOVIĆ:T.46626-46627; P725,pp.2,5-7; P3640, pp.3-6,53; **ARK**:AF1925; R.BRĐANIN:D4034,para.36; **Prijedor**:AF1094.

were subjected to forced labour, including digging trenches on the frontlines.¹⁰⁴⁴

(vi) KARADŽIĆ's authority and control over CSs

297. Before, during and after the attacks, **KARADŽIĆ** and the republic-level organs he controlled retained authority over the CSs. CSs accepted **KARADŽIĆ's** uncontested position as party leader, which only strengthened after the conflict commenced¹⁰⁴⁵ as CSs were transformed into state organs.¹⁰⁴⁶

298. After the war, **KARADŽIĆ** worked to destroy inculpatory documents by "hav[ing] the archives in municipalities cleared out",¹⁰⁴⁷ and exhorted his SDS subordinates to toe the party line that:

Crisis Staffs were organised by municipal bodies, remember that, and stress it firmly to them, it was the municipal bodies elected in the 1990 elections, and not the party.¹⁰⁴⁸

Despite **KARADŽIĆ's** best efforts, the evidence is clear. CSs were **KARADŽIĆ's** creation, and remained under his authority throughout.

299. Orders received by local leaderships in the immediate run-up to the takeovers¹⁰⁴⁹ are discussed above.¹⁰⁵⁰ CSs continued to receive and implement republic-level orders and policies after the takeovers started.¹⁰⁵¹ [REDACTED]

[REDACTED]

[REDACTED] Similarly, on 16 May 1992, Vogošća CS stated that it was "under the

¹⁰⁴⁴ **Sanski Most**:B.TADIĆ:T.44429,44433; P6541,pp.1,3-4; **Novo Sarajevo**:KDZ310:P1938,para.46;

¹⁰⁴⁵ B.DERIĆ:P4982,para.40.

¹⁰⁴⁶ D.HANSON:P2589,paras.38-39,60-63; D.HANSON:T.14545-14547; P3077; P3051; D406; P2627.

¹⁰⁴⁷ P6490,p.2. *See also* [REDACTED]; P6489.

¹⁰⁴⁸ P6490,p.1.

¹⁰⁴⁹ *See e.g.* D304,pp.20-21; D90,pp.38-39; P961,pp.17,20-22.

¹⁰⁵⁰ *See* III.C.2-3: Variant A/B; Countdown to war.

¹⁰⁵¹ D.HANSON:P2589,paras.31,60,62; D.HANSON:T.14548-14554. *See e.g.* P2617,p.2;

Sokolac:P4983; **Vlasenica**:P2617; **Bratunac**:D.GUŠIĆ:T.17793-17794; **Ključ**:P3497; P2643,p.2;

[REDACTED]; **Sanski Most**:P2613; P2614; **Brčko**:P1364,p.92.

¹⁰⁵² [REDACTED] *See also* P2614,p.1.

¹⁰⁵³ [REDACTED].

sole command of the Serb Republic of BiH".¹⁰⁵⁴

300. Republic-level mobilisation orders were implemented at local level. On 15 April, the NSC proposed that the Presidency declare an imminent threat of war,¹⁰⁵⁵ and the Presidency did so, ordering mobilisation.¹⁰⁵⁶ The Bratunac CS implemented these decisions, ordering mobilisation pursuant to the Presidency order,¹⁰⁵⁷ and ordering disarmament on 19 April citing the NSC decision.¹⁰⁵⁸ The Vlasenica CS proclaimed an imminent threat of war on 19 April pursuant to the NSC decision,¹⁰⁵⁹ and the Novo Sarajevo CS implemented the "NSC"¹⁰⁶⁰ mobilisation order on 22 April 1992.¹⁰⁶¹ The mobilisation order was also implemented throughout the ARK.¹⁰⁶²

301. Other examples of implementation of republic-level decisions¹⁰⁶³ include the Brčko municipal assembly transferring its powers to a newly-elected War Presidency on 29 April pursuant to **KARADŽIĆ**'s order,¹⁰⁶⁴ and the Rogatica CS's transformation of the Rogatica TO "[b]y the Decision of the Presidency".¹⁰⁶⁵ The implementation of republic-level decisions on detentions,¹⁰⁶⁶ dismissals,¹⁰⁶⁷ and the appropriation of non-Serbs' property¹⁰⁶⁸ is discussed above. The implementation of republic-level decisions in the ARK municipalities is discussed in detail below.¹⁰⁶⁹

302. Multiple municipal leaders explicitly acknowledged **KARADŽIĆ**'s authority over them.¹⁰⁷⁰ Ilidža CS President PRSTOJEVIĆ confirmed that **KARADŽIĆ** and **KRAJIŠNIK** could remove him whenever they wanted.¹⁰⁷¹ In a 25 March 1992 letter

¹⁰⁵⁴ P2635.

¹⁰⁵⁵ P3050.

¹⁰⁵⁶ P3922; P2412.

¹⁰⁵⁷ P4383.

¹⁰⁵⁸ P4377; B.TEŠIĆ:D3115,para.20.

¹⁰⁵⁹ P6137.

¹⁰⁶⁰ As discussed above, the "NSC" order was in fact a Presidency order based on a NSC recommendation. *See* III.C.8.(d): National Security Council (NSC).

¹⁰⁶¹ D888; KDZ310:P1938,para.16.

¹⁰⁶² *See* III.C.8.(g).(vii): The ARK as an example of CS implementation of the common criminal plan.

¹⁰⁶³ *See e.g.* P2391; P2369, implemented in **ARK**:P5513; **Ključ**:P2643,p.2; P2606,p.26; P3454;

Prijedor:AF1032-AF1033; P2104,p.2; P2608.

¹⁰⁶⁴ P2888,p.1; Đ.RISTANIĆ:P3023,paras.17,144.

¹⁰⁶⁵ P2835,p.6. *See also* P5548.

¹⁰⁶⁶ *See* Brief,para.288.

¹⁰⁶⁷ *See* Brief,para.294.

¹⁰⁶⁸ *See* Brief,paras.292-293.

¹⁰⁶⁹ *See* III.C.8.(g).(vii).a: ARK was subordinated to republic-level.

¹⁰⁷⁰ *See e.g.* **Brčko**:P1364,p.92; **ARK**:V.KUPREŠANIN:T.43486; **Foča**:P5515; **Ilidža**:D92,p.66;

Vogošća:P970,pp.297-298.

¹⁰⁷¹ **Ilidža**:P2513,p.1; P2519. PRSTOJEVIĆ's claims that these prior statements were incorrect should be disregarded as obvious efforts to assist the Accused. N.PRSTOJEVIĆ:T.13582-13584.

to **KARADŽIĆ**, the Rogatica CS stated that "in compliance with your instructions, [the] factual division on the ground should be and is already there" (and therefore decried SDS Main Board member Rajko KUSIĆ's premature threats to attack "when the Serbian people are not sufficiently prepared").¹⁰⁷² At the third anniversary of the "liberat[ion]" of Foča, STANIĆ declared: "We, the Serbs on the west bank of the Drina River know very well that our leaders are Dr. Radovan KARADŽIĆ and General Ratko MLADIĆ".¹⁰⁷³ As Defence witness and ARK CS member KUPREŠANIN stated, there was a "chain of command" from the RS President to municipality presidents.¹⁰⁷⁴

(vii) The ARK as an example of CS implementation of the common criminal plan

303. The ARK CS—functioning as early as January 1992¹⁰⁷⁵ but formally announced on 5 May 1992¹⁰⁷⁶—was an intermediary body between ARK municipalities and the republic-level authorities. After the ARK CS was established, with BRĐANIN at its helm, the ARK Assembly and Executive Committee effectively ceased to operate.¹⁰⁷⁷

a. ARK was subordinated to republic-level

304. Even before **KARADŽIĆ** assumed his formal position as President of the Presidency, the ARK leadership deemed **KARADŽIĆ** the Supreme Commander who must be obeyed.¹⁰⁷⁸

305. The ARK CS followed policy set at the republic-level.¹⁰⁷⁹ Prior to the conflict, **KARADŽIĆ** maintained close contact with ARK personnel, especially ARK

¹⁰⁷² P6105.

¹⁰⁷³ P3476, pp.3,5.

¹⁰⁷⁴ V.KUPREŠANIN:P6510,p.7; V.KUPREŠANIN:T.43518-43519.

¹⁰⁷⁵ P2553; P6530.

¹⁰⁷⁶ P6. Deputy in the Assembly, Radoslav BRĐANIN, was President of the ARK CS. Other members included Vojo KUPREŠANIN, Milovan MILANOVIĆ, Nikola ERCEG, Predrag RADIĆ, General Momir TALIĆ, CSB Chief Stojan ŽUPLJANIN, Nenad STEVANDIĆ (commander of the Red Berets and the SOS forces), Nedeljko KESIĆ, and police "special unit" member Slobodan DUBOČANIN.

¹⁰⁷⁷ N.ERCEG:D4086, paras.12-13,18.

¹⁰⁷⁸ P987,p.2. See also P.RADIĆ:P1,pp.40-41; T.KOMAD:T.36331.

¹⁰⁷⁹ P.RADIĆ:P1,pp.58-59.

President BRĐANIN,¹⁰⁸⁰ KUPREŠANIN,¹⁰⁸¹ RADIĆ,¹⁰⁸² SDS Main Board member and SDS Regional Board President Radislav VUKIĆ,¹⁰⁸³ SOS Commander¹⁰⁸⁴ Nenad STEVANDIĆ,¹⁰⁸⁵ and ČIZMOVIĆ¹⁰⁸⁶ in relation to SDS policies, strategies and plans. BRĐANIN, KUPREŠANIN, RADIĆ and VUKIĆ regularly contacted **KARADŽIĆ** for guidance, direction and approval, coming to see him "rather frequently".¹⁰⁸⁷ Equally, **KARADŽIĆ** frequently visited Banja Luka (by January 1992 he had been 27 times),¹⁰⁸⁸ sent emissaries¹⁰⁸⁹ or summoned ARK leaders for meetings.¹⁰⁹⁰

306. BRĐANIN could not have become ARK CS President without **KARADŽIĆ**'s authorization,¹⁰⁹¹ and was **KARADŽIĆ**'s choice to take power in the Krajina.¹⁰⁹² BRĐANIN was "very obedient"¹⁰⁹³ and "could not have worked on his own initiative; he had to receive instructions about what he was supposed to do."¹⁰⁹⁴ In November 1991, **KARADŽIĆ** ordered ARK municipality presidents to follow BRĐANIN's instructions, stating: "Whatever Brđanin wrote to you: Apply everything, we are at war!"¹⁰⁹⁵ BRĐANIN repeatedly affirmed that **KARADŽIĆ** and the SDS leadership had his support and the SDS hierarchy should be respected.¹⁰⁹⁶ In his own words: "I am a man who abides by two principles: I obey and respect those who are above me, all those who are under my command must obey me".¹⁰⁹⁷ As discussed above, BRĐANIN's reliance on **KARADŽIĆ** led **KARADŽIĆ** to chastise him for calling him about "every trivial matter".¹⁰⁹⁸

307. BRĐANIN was known for his noxious rhetoric regarding the expulsion of

¹⁰⁸⁰ D285; D1289; P5889; P5886; D1290; P5879; D290; P5841; P2559; P4; P2549; P5551.

¹⁰⁸¹ P5678; P5892; P1084; D4024; D278; D1283; D423; D280; P5784; D424; P5745.

¹⁰⁸² D1291; P4; P5799; P5641; P5617.

¹⁰⁸³ D271; P5895; P5891; P5888; D289; P5842; P2555; P5840; D1293; P5826; P4. VUKIĆ had

KARADŽIĆ's full support and approval. M.DODIK:T.36886.

¹⁰⁸⁴ P2855,p.4; AF528; AF2223.

¹⁰⁸⁵ D277; D1433; P5639; D1434; P5633; P2556.

¹⁰⁸⁶ P2551; P5770; P2552; P2553; P5732; P5730.

¹⁰⁸⁷ T.KOMAD:T.36331. *See also* P5640.

¹⁰⁸⁸ P2556,p.12; D88,p.44; P1405,p.172.

¹⁰⁸⁹ P2556; P5891; P5879.

¹⁰⁹⁰ P5886; D277,pp.5,7; P2559,pp.4,6.

¹⁰⁹¹ M.DODIK:T.36884-36885.

¹⁰⁹² P2596.

¹⁰⁹³ P.RADIĆ:P2,p.61.

¹⁰⁹⁴ P.RADIĆ:P1,pp.40-41.

¹⁰⁹⁵ P958,p.10.

¹⁰⁹⁶ P1481,pp.119-120; P1105,p.20; P1367,p.103; P1371,p.172.

¹⁰⁹⁷ P6243,p.39.

non-Serbs from the ARK,¹⁰⁹⁹ which, BRĐANIN admitted, "could have been harsh and offensive".¹¹⁰⁰ BRĐANIN declared that "it is the obligation of Serbs over the next hundred years to wipe their feet from the foul non-Christians who have befouled this soil of ours",¹¹⁰¹ that Serbs should put up "barbed wire" so that "never again will our enemies spread throughout Krajina",¹¹⁰² and that the greatest wonder in the world would be "that BRĐANIN could participate in a process of return of Croats and Muslims".¹¹⁰³ Defence witnesses confirmed BRĐANIN saying that Muslims and Croats would have to leave the Krajina,¹¹⁰⁴ that only a "few percent" could remain,¹¹⁰⁵ that only a thousand Muslims could stay in Banja Luka,¹¹⁰⁶ that only a limited number of Muslims should be allowed to come back,¹¹⁰⁷ and that Muslims should not bother to pickle cabbage because "there would be no time to eat it".¹¹⁰⁸ KUPREŠANIN acknowledged that BRĐANIN's statements "probably" contributed to the departure of non-Serbs as they "contributed to the great danger that [...] Croats and Muslims were put into".¹¹⁰⁹

308. In KUPREŠANIN's view, "somebody could have shortened [BRĐANIN's] horns", including "the president of the country".¹¹¹⁰ KUPREŠANIN considered that BRĐANIN "probably served his purpose to someone as if being an extreme person".¹¹¹¹ ERCEG confirmed that it was "obvious" that BRĐANIN had a "very good relationship" with KARADŽIĆ and the BSL, and one could tell that "the common goal they all shared brought them together".¹¹¹²

309. KARADŽIĆ insisted on adherence to party policy in the ARK,¹¹¹³ as

¹⁰⁹⁸ P2549,pp.3-5.

¹⁰⁹⁹ See e.g. P.RADIĆ:P1,pp.27-28.

¹¹⁰⁰ R.BRĐANIN:T.43699-43701.

¹¹⁰¹ P6515; R.BRĐANIN:T.43703-43704.

¹¹⁰² P6515; R.BRĐANIN:T.43704-43705.

¹¹⁰³ P1392,p.50; R.BRĐANIN:T.43707-43708.

¹¹⁰⁴ N.ERCEG:T.44102-44103; A.GRAHOVAC:T.44039-44040.

¹¹⁰⁵ V.KUPREŠANIN:P6510,p.15; M.SAJIĆ:T.44166-44167. See also [REDACTED]; M.MUJADŽIĆ:T.20626-20627,20631-20633.

¹¹⁰⁶ V.KUPREŠANIN:T.43498-43499.

¹¹⁰⁷ V.KUPREŠANIN:T.43499.

¹¹⁰⁸ V.KUPREŠANIN:T.43499. See also M.SAJIĆ:T.44166-44167; [REDACTED].

[REDACTED].

¹¹⁰⁹ V.KUPREŠANIN:P6510,p.20. See also M.SAJIĆ:T.44168-44169.

¹¹¹⁰ V.KUPREŠANIN:P6510,p.20; V.KUPREŠANIN:T.43503-43504.

¹¹¹¹ V.KUPREŠANIN:P6510,p.14.

¹¹¹² N.ERCEG:T.44088.

¹¹¹³ D277,p.6; D290; P2555,p.6; P5841; P5840; D1293; P5798; D274.

exemplified by his quashing the ARK leadership's move towards independence in early 1992. **KARADŽIĆ** was vigorously opposed to any such move, and made his opposition clear, stating to STEVANDIĆ in no uncertain terms that "[t]he Serbs are not going to split, I will throw the shit-heads out instead [...] by a single move of the pen",¹¹¹⁴ if they continued to flout party policy. On 25 February, KUPREŠANIN, who also opposed ARK independence, pleaded before the Assembly that **KARADŽIĆ** come to Banja Luka to quell the rebellion, stating "I know that **KARADŽIĆ**, as the President of the SDS, is truly the leading figure among the Serbian people. And five of his sentences are enough to change the entire course of the session."¹¹¹⁵ KUPREŠANIN affirmed this at trial, stating: "Quite simply, Radovan's five sentences meant more than who knows how many speeches of mine."¹¹¹⁶

310. Four days later, **KARADŽIĆ** obliged and attended the ARK Assembly, where he stated that "it would be a crime against the Krajina if it were declared a Republic".¹¹¹⁷ 148 ARK deputies unanimously voted in **KARADŽIĆ**'s favour, and moves towards a Krajina state ended.¹¹¹⁸ Following the aborted attempt, **KARADŽIĆ** ensured that the ARK authorities were under the direct control of the Pale leadership.¹¹¹⁹

311. **KARADŽIĆ** used Banja Luka as the forum to announce the strategic objectives to the RS civilian and military leadership on 12 May 1992.¹¹²⁰ On 2 June, he and MLADIĆ returned to Banja Luka to meet with the ARK leadership and VRS commanders,¹¹²¹ to discuss the strategic objectives.¹¹²² Republican leadership visits to the ARK continued through summer 1992, with BSL members including Ministers SUBOTIĆ, OSTOJIĆ and KALINIĆ and Generals TALIĆ and NINKOVIĆ attending the 17 July 1992 ARK Assembly session to receive reports on the ARK and report on the wider situation in the RS.¹¹²³

¹¹¹⁴ P2556,p.5. *See also* P5732.

¹¹¹⁵ D88,p.65.

¹¹¹⁶ V.KUPREŠANIN:T.43486.

¹¹¹⁷ P5452,p.2.

¹¹¹⁸ P5452,p.1.

¹¹¹⁹ M.DODIK:T.36888-36889.

¹¹²⁰ *See* III.C.5.(a): The strategic objectives as articulated at the 16th Assembly.

¹¹²¹ P1478,p.53; R.BRĐANIN:T.43681-43682.

¹¹²² [REDACTED]

¹¹²³ P5513.

b. Implementation of the common criminal plan in the ARK

312. Contrary to repeated Defence claims, the ARK was neither "cut off",¹¹²⁴ nor did its leaders act independently.¹¹²⁵ Rather, the ARK illustrates the implementation of the common criminal plan through the republic-regional-municipal hierarchy.

313. Municipal CSs were subordinated to the ARK CS. ARK CS decisions and conclusions were binding on ARK municipalities,¹¹²⁶ and ARK CS orders were obeyed by the municipal CSs.¹¹²⁷ BRĐANIN confirmed "[e]verything in the ARK is done at [CS] level".¹¹²⁸ The ARK CS's role as an intermediate level of authority between the republic leadership and the municipalities was affirmed by CSB Banja Luka¹¹²⁹ and ARK municipal authorities.¹¹³⁰ Members of the military leadership attended ARK CS meetings.¹¹³¹ Municipality CS presidents attended ARK CS weekly meetings.¹¹³² Municipal CSs deferred to the ARK on significant issues, for example the Sanski Most CS resolved on 29 April 1992 that "[i]n connection with appointing the chief of the [SJB] and the functioning of the Sanski Most [TO]", the CS President and TO Commander were "instructed to visit Banja Luka".¹¹³³

314. As discussed in detail below, the ARK could and did communicate with the republican authorities in the first months of the war.¹¹³⁴ Information and orders were passed from the republic-level, through the ARK, to the municipal level. For example, as discussed above,¹¹³⁵ on 15 April 1992 the Presidency issued a decision declaring an imminent threat of war and ordering TO mobilisation.¹¹³⁶ The Minister of National Defence Bogdan SUBOTIĆ forwarded this decision to all Serb assemblies—including the ARK—for implementation, providing further instructions on

¹¹²⁴ See e.g. R.BRĐANIN:D4034,para.9; KW426:T.46706-46707; M.KRAJIŠNIK:T.43315; M.SAJIĆ:D4114,para.48.

¹¹²⁵ See e.g. R.BRĐANIN:D4034,para.14; B.SUBOTIĆ:D3695,para.248.

¹¹²⁶ P5415.

¹¹²⁷ M.DODIK:T.36886-36887; M.DODIK:T.36890; [REDACTED]; P2606,p.5; M.MILINČIĆ:T.44987. See also B.MANDIĆ:T.45763.

¹¹²⁸ P1478,p.54. See also R.BRĐANIN:T.43682-43684, confirming that while War Commissioners were appointed elsewhere, they were not appointed in the ARK while the ARK CS was in existence.

¹¹²⁹ D1536,pp.2,4.

¹¹³⁰ P2606,p.2; P3646; P3497,p.1; P2614; P2605,Art.11.

¹¹³¹ P6438.

¹¹³² R.BRĐANIN:T.43649-43651; P6512; M.SAJIĆ:D4114,para.37,50. See also P2606,pp.7-8,14-18; P6437,paras.1,2; M.MILINČIĆ:P6564,pp.118-119; M.MILINČIĆ:T.44987.

¹¹³³ P3649.

¹¹³⁴ See III.C.9.(b): KARADŽIĆ and the BSL had effective communications.

¹¹³⁵ See Brief,para.300.

mobilisation.¹¹³⁷ SUBOTIĆ's decision was forwarded by ARK CS member ERCEG to municipal presidents for implementation on 29 April,¹¹³⁸ and implemented by the ARK regional secretariat for national defence on 4 May.¹¹³⁹ The mobilisation order was implemented in the ARK municipalities.¹¹⁴⁰

315. In its 4 May decision, the ARK regional Defence Secretariat also provided for the imposition of a curfew, and the disarmament of "[a]ll paramilitary formations and individuals who illegally possess weapons" by 11 May 1992.¹¹⁴¹ The same day, ŽUPLJANIN ordered his SJB chiefs to "undertake the necessary activities" to implement this decision.¹¹⁴² On 11 May 1992, municipality presidents were informed by the ARK CS of the extension of this deadline until 14 May 1992,¹¹⁴³ as reported by General TALIĆ the following day.¹¹⁴⁴ Local SJB chiefs were also kept abreast of the deadline extension by CSB Banja Luka.¹¹⁴⁵ This disarmament was implemented in municipalities including Ključ,¹¹⁴⁶ Sanski Most,¹¹⁴⁷ Prijedor,¹¹⁴⁸ and Bosanski Novi,¹¹⁴⁹ and in each of these municipalities the same pattern ensued: the CS called on non-Serbs to disarm, searches and seizures followed, non-Serb villages and areas were attacked, and systematic crimes committed against the non-Serb population.¹¹⁵⁰

316. Equally, KARADŽIĆ's 20 May 1992 decision on mobilisation of the VRS¹¹⁵¹ was received directly and implemented in the ARK municipalities within days.¹¹⁵² 1KK Commander and ARK CS member TALIĆ¹¹⁵³ emphasised to his units the need to establish the "closest possible cooperation with the people and legal authorities

¹¹³⁶ P3922.

¹¹³⁷ P2412.

¹¹³⁸ P6531.

¹¹³⁹ P2818.

¹¹⁴⁰ See e.g. ARK:M.SAJIĆ:D4114,para.13; M.SAJIĆ:T.44130; Prijedor:P3535; Sanski Most:P2613; Bosanski Novi:P2632,p.3; M.SAJIĆ:T.44134-44135; Ključ: [REDACTED].

¹¹⁴¹ P2818.

¹¹⁴² P2819,pp.2-3.

¹¹⁴³ P3694; P3475.

¹¹⁴⁴ P3925.

¹¹⁴⁵ D4453.

¹¹⁴⁶ P3439; P3444; P3444,p.1.

¹¹⁴⁷ P3644; P3647; P2613; P3402; P3648; M.SAJIĆ:T.44130.

¹¹⁴⁸ D470,p.27.

¹¹⁴⁹ P2632,p.3; D1921,pp.1,5; M.SAJIĆ:T.44134-44135.

¹¹⁵⁰ M.SAJIĆ:T.44137-44138. See further Municipality Summaries.

¹¹⁵¹ P3919.

¹¹⁵² See e.g. Ključ: [REDACTED]; D1726; Sanski Most:P2613; Prijedor:P3537.

¹¹⁵³ P6.

within their zones of responsibility"¹¹⁵⁴ in this regard.

317. The transmission of republic-level policies from ARK level to municipal level is also evident in respect of dismissals. In November 1991, **KARADŽIĆ** encouraged **BRĐANIN** to dismiss those who hadn't voted in the plebiscite, but warned him to keep this quiet, stating "it has to be done, but you mustn't say that".¹¹⁵⁵ Once the conflict had broken out, such precautions were no longer necessary. On 13 May 1992, the ARK CS issued a decision requiring that management positions "be filled with people who are absolutely loyal" to the RS.¹¹⁵⁶ This was followed by a 22 June 1992 ARK CS decision providing that all executive posts be held only by Serbian nationals,¹¹⁵⁷ a decision that was delivered to municipality CS presidents,¹¹⁵⁸ forwarded by Banja Luka CSB Chief **ŽUPLJANIN** to all SJBs for implementation,¹¹⁵⁹ and implemented in numerous municipalities including Prijedor¹¹⁶⁰ and Ključ.¹¹⁶¹ ARK CS member **RADIĆ** confirmed that the policy of dismissals came from Pale.¹¹⁶²

318. In parallel with dismissals and other forms of discriminatory pressures, ARK authorities implemented more direct means of fulfilling the common purpose. On 29 May, the ARK CS resolved that "all Muslims and Croats, who so wish, should be able to move out of the area of the [ARK]" and provided for an organised exchange or "resettlement", declaring that "several thousand Muslims from Prijedor, Sanski Most and Bosanski Novi wish to move to Central Bosnia, of their own free will".¹¹⁶³ The following day, Sanski Most CS resolved to liaise with the ARK leadership "regarding implementation of the idea on resettlement of the population".¹¹⁶⁴ IKK reports were more frank: one referred to "public statements made in the media by SDS [ARK] leaders who advocate moving and expelling all Muslims and Croats from these areas",¹¹⁶⁵ while another stated that while the ARK had issued a decision to facilitate

¹¹⁵⁴ P3920.

¹¹⁵⁵ P4. The discussion in this intercept refers to P1632.

¹¹⁵⁶ P5470.

¹¹⁵⁷ P7.

¹¹⁵⁸ See P2740,p.2; P7.

¹¹⁵⁹ P6533.

¹¹⁶⁰ P2740; P2637,p.2; P9,p.2.

¹¹⁶¹ P3587; P3464. See also **Petrovac:P8**; **Banja Luka:P5514**.

¹¹⁶² P.RADIĆ:P1,pp.51-54.

¹¹⁶³ P3461.

¹¹⁶⁴ P2614.

¹¹⁶⁵ P3662.

non-Serbs departures, "[t]hose departing will not be allowed to return".¹¹⁶⁶

319. At a 7 June sub-regional meeting of representatives from many ARK municipalities, the common understanding that non-Serbs could not remain in the claimed areas was explicitly acknowledged ("Muslims and Croats should move out of our municipalities until a level is reached where Serbian authority can be maintained and implemented on its own territory in each of these municipalities"),¹¹⁶⁷ along with a demand for the immediate establishment of a pathway through which they could be expelled. That conclusion was sent to the RS leadership and ARK CS¹¹⁶⁸ and immediately affirmed by the ARK CS the following day.¹¹⁶⁹ The ARK CS then established an "agency" for population resettlement,¹¹⁷⁰ and required that each municipality appoint "one representative to deal with the matters of relocation and exchange of population and prisoners".¹¹⁷¹

320. Permanent "resettlement" following ARK CS decisions and subsequent municipal CS decisions occurred in municipalities including Prijedor, Sanski Most, Ključ and Bosanski Novi.¹¹⁷² For example, following the ARK decision on "voluntary resettlement" and the Bosanski Novi CS implementing order, the Bosanski Novi SJB deregistered 5,680 persons, of whom 5,629 were Muslims.¹¹⁷³ Further, the ARK War Presidency declared that persons leaving the ARK could take no more than DM300,¹¹⁷⁴ and CSB Banja Luka instructed its subordinate SJBs to implement this decision.¹¹⁷⁵ Equally, municipal CSs followed ARK instructions on prisoners.¹¹⁷⁶

321. While the ARK CS was often the conduit, policy was set at the republic-level. As noted above, BRĐANIN requested a position from the "highest level" regarding prisoners and refugees.¹¹⁷⁷ Equally, **KARADŽIĆ**'s "de facto" principle was echoed at the regional and municipal level. BRĐANIN asserted before the cleansing campaign

¹¹⁶⁶ P3656.

¹¹⁶⁷ P2641.

¹¹⁶⁸ P2641,p.1.

¹¹⁶⁹ P6437,p.2, providing that the conclusions of the sub-regional meeting had been adopted as official ARK CS positions.

¹¹⁷⁰ P2606,p.15.

¹¹⁷¹ P2732.

¹¹⁷² See Municipality Summaries.

¹¹⁷³ D470,pp.21-22/D1921,p.4(duplicates).

¹¹⁷⁴ P3447.

¹¹⁷⁵ D1307.

¹¹⁷⁶ P2606,p.16.

¹¹⁷⁷ P1478,pp.55-56.

began: "Once we have secured our borders, Europe will accept the facts!"¹¹⁷⁸ After territories on which Muslims had been a majority had been "liberated" he boasted: "We have achieved tremendous results and we can therefore only negotiate about the actual situation. Everything we have liberated is Serbian land."¹¹⁷⁹ This principle was reflected in turn at the municipal level, with STAKIĆ stating in January 1993 that European monitors should come to the ARK and "draw new maps" based on the factual situation on the ground.¹¹⁸⁰ In this way, the ARK authorities sought to consolidate the results of their brutally effective cleansing campaign, carried out under the oversight of **KARADŽIĆ** and the BSL.

(h) RS MUP

322. **KARADŽIĆ**, STANIŠIĆ and other JCE members used the RS MUP to establish and maintain Bosnian Serb authority over the territory and to implement the common criminal purpose. They stacked the pre-war SRBiH MUP with their own hand-picked cadre of Bosnian Serbs, cleaved this group from the multi-ethnic SRBiH police force to create a Serb-only RS MUP, then unleashed this force on non-Serbs in the targeted municipalities.

(i) Creation of the RS MUP

323. From mid-1991, **KARADŽIĆ** contemplated the division of the multi-ethnic SRBiH MUP as an essential component of creating a "parallel state".¹¹⁸¹ To lay the foundation for a Serb-only MUP, **KARADŽIĆ** micromanaged the appointments of Serbs to SRBiH MUP posts through high-ranking SDS-approved Serbs in the multi-ethnic police force,¹¹⁸² including MANDIĆ, then Assistant Minister for the Prevention and Detection of Crime in the SRBiH MUP.¹¹⁸³ Though **KARADŽIĆ** never held a position in the SRBiH Government, MANDIĆ referred to him in 1991 as "boss".¹¹⁸⁴

¹¹⁷⁸ D86,p.24.

¹¹⁷⁹ P1371,p.93.

¹¹⁸⁰ P6583,p.2.

¹¹⁸¹ D364,p.9; D365,p.2. *See also* D270,p.7; P5806,p.2.

¹¹⁸² R.NEŠKOVIĆ:P2568,pp.178,229; C.NIELSEN:P2958,para.14; C.NIELSEN:T.16244; P5685; D357; D270,pp.5-9; P2963; P5869; D2926; P1079; P2999; P1080; D277; V.ŽEPINIĆ:D2923,para.21; Č.KLJAJIĆ:T.42189-42191. *See also* P.PANIĆ:P3380,pp.167-168.

¹¹⁸³ C.NIELSEN:P2958,para.18.

¹¹⁸⁴ *See e.g.* D372,p.1

KARADŽIĆ "liked to meddle in [...] cadre problems" and "always wanted to have a finger in the pie".¹¹⁸⁵

324. For example, in July 1991, **KARADŽIĆ** was intimately involved in the appointment of Čedomir KLJAJIĆ as Deputy to the Assistant Minister of Police in the SRBiH MUP. Discussing KLJAJIĆ and other appointments, **KARADŽIĆ** told MANDIĆ that "not a one person can be appointed without our [SDS] agreement" and that "[e]verybody's career will be questioned if you fuck up with Serbian personnel".¹¹⁸⁶ At an SDS Deputies' Club meeting held the same month, **KARADŽIĆ** demanded—slamming his fist on the table—that Vito ŽEPINIĆ, a Serb serving as Deputy Minister of the SRBiH MUP,¹¹⁸⁷ get KLJAJIĆ reinstated as Deputy to the Assistant Minister of the SRBiH MUP.¹¹⁸⁸ KLJAJIĆ, whom **KARADŽIĆ** supported so aggressively, later became Under-Secretary for Public Security in the RS MUP.¹¹⁸⁹

325. **KARADŽIĆ** also had close connections with his future RS MUP Minister, Mićo STANIŠIĆ. STANIŠIĆ had been a member of the Preparatory Committee for establishing the SDS,¹¹⁹⁰ and the SDS nominated him to his leadership position within the SRBiH MUP.¹¹⁹¹ Though STANIŠIĆ was then secretary of the SUP of the city of Sarajevo, as ŽEPINIĆ—his superior in the SRBiH MUP explained—STANIŠIĆ "tried as much as he could to please Karadžić instead of doing his job".¹¹⁹²

326. **KARADŽIĆ** was close to STANIŠIĆ and repeatedly backed him.¹¹⁹³ For example, during July 1991, when STANIŠIĆ was under investigation for providing weapons to SJBs Pale and Ilidža, **KARADŽIĆ** supported STANIŠIĆ.¹¹⁹⁴ In late December 1991—even as he continued to serve in the SRBiH MUP—STANIŠIĆ was

¹¹⁸⁵ M.MANDIĆ:T.4441-4443.

¹¹⁸⁶ P1079,pp.2-3. *See also* P2999. *See also* C.NIELSEN:P2958,para.17; D270,pp.5-6; D4287,p.3; D364,p.5; P1080.

¹¹⁸⁷ C.NIELSEN:P2958,para.18.

¹¹⁸⁸ Č.KLJAJIĆ:T.42189-42191. *See also* D4287,p.7.

¹¹⁸⁹ Č.KLJAJIĆ:D3917,para.2; Č.KLJAJIĆ:T.42185.

¹¹⁹⁰ P1383,p.57.

¹¹⁹¹ P6625,p.2; P1383,pp.56-57.

¹¹⁹² V.ŽEPINIĆ:T.33598.

¹¹⁹³ *See e.g.* D4286; P1383,pp.51-52,56-57; B.ĐERIĆ:P4982,para.9; P6624.

¹¹⁹⁴ P1079,pp.3-4; P2999.

appointed to the Council of Ministers,¹¹⁹⁵ a "government in waiting" that would later form the core of the RS Government.¹¹⁹⁶

327. On 11 February 1992, STANIŠIĆ informed a meeting of high-level Serbs in the SRBiH MUP that the Council had decided that a Bosnian Serb MUP was to be formed.¹¹⁹⁷ MANDIĆ was responsible for implementing the decision¹¹⁹⁸ and followed up immediately.¹¹⁹⁹ He told key SRBiH MUP officials throughout BiH—including ŽUPLJANIN in Banja Luka and Predrag JEŠURIĆ in Bijeljina¹²⁰⁰—to arrange a meeting with leading personnel in their areas to implement the conclusions of the 11 February meeting.¹²⁰¹ STANIŠIĆ, as one of his first acts as RS Minister of the Interior, appointed these men as chiefs of CSBs Banja Luka and Bijeljina in the new RS MUP.¹²⁰²

328. At the same time, ethnic Serb MUP personnel in municipalities were secretly distributing arms to Serbs,¹²⁰³ forming and arming Serb police units, and otherwise preparing to establish separate Serb SJBs.¹²⁰⁴

329. On 28 February 1992, the Assembly passed the Law on Internal Affairs establishing a separate Bosnian Serb MUP, effective 31 March 1992.¹²⁰⁵ This law envisioned a similar hierarchy¹²⁰⁶ and structure—to the SRBiH MUP, with Public¹²⁰⁷ and State Security Divisions¹²⁰⁸ and CSBs¹²⁰⁹ covering territories in which each municipality had a SJB.¹²¹⁰ CSB Banja Luka included the Municipalities of Banja Luka, Ključ, Prijedor, Bosanski Novi and Sanski Most.¹²¹¹ CSB Bijeljina included the Municipalities of Bijeljina, Brčko and Zvornik.¹²¹² CSB Sarajevo included the

¹¹⁹⁵ P.TREANOR:P2536,p.162.

¹¹⁹⁶ See III.C.8.(b): Government.

¹¹⁹⁷ P1083; Č.KLJAJIĆ:T.42192-42196; P.TREANOR:P2536,p.162; M.MANDIĆ:C2,p.43.

¹¹⁹⁸ P1083; M.MANDIĆ:C2,p.44; C.NIELSEN:P2958,paras.59-60.

¹¹⁹⁹ M.MANDIĆ:C2,pp.50-51; C.NIELSEN:P2958,para.61; P1112; P1113,p.2; D422,p.41.

¹²⁰⁰ P1112; C.NIELSEN:P2958,para.61.

¹²⁰¹ C.NIELSEN:P2958,para.61; P1112.

¹²⁰² M.STANIŠIĆ:T.46479.

¹²⁰³ See e.g. P2967,p.2; C.NIELSEN:P2958,paras.70-71,73-74; **Ilidža**:P2308,p.2; **Ključ**:P3424,p.2;

Zvornik:P3390,p.20.

¹²⁰⁴ C.NIELSEN:P2958,paras.70-74; P3390,pp.20-21; P2968; P2308,pp.2-3.

¹²⁰⁵ P2964,Art.130.

¹²⁰⁶ See C.NIELSEN:T.16238-16239.

¹²⁰⁷ C.NIELSEN:P2958,para.109; P2964,Arts.14-17.

¹²⁰⁸ C.NIELSEN:P2958,para.112; P2964,Arts.18-25.

¹²⁰⁹ C.NIELSEN:P2958,paras.115-116; P2964,Art.28; P2965,Art.3.

¹²¹⁰ C.NIELSEN:P2958,para.115; P2965,Art.4.

¹²¹¹ P2965,Art.3; D1536,p.1.

¹²¹² P2965,Art.3.

Municipalities of Novo Sarajevo, Ilidža, Hadžići, Pale, Vogošća, Rogatica, Sokolac, Bratunac and Vlasenica.¹²¹³ CSB Trebinje included the Municipality of Foča.¹²¹⁴

330. As discussed above, on 24 March 1992, **KARADŽIĆ** informed the Assembly that preparations were in place to form a Bosnian Serb MUP, that "this could happen in two or three days" and that "there will be a single method used and you will be able to apply it in the municipalities you represent [...] [h]ow to separate the police force, take the resources that belong to the Serbian people, and take command".¹²¹⁵

331. On 31 March 1992, pursuant to "instructions from the political leadership of the Serb people",¹²¹⁶ MANDIĆ sent a dispatch to all CSBs and SJBs in SRBiH¹²¹⁷ which declared that from 1 April 1992, BiH SJB stations would cease to function and would be taken over by Bosnian Serb SJBs. MANDIĆ later boasted that in so doing he had "fucked the [SRBiH] MUP to pieces".¹²¹⁸

332. There was an immediate reaction from the joint MUP and others, expressing opposition to segregation on a national basis and concern that this would trigger war.¹²¹⁹ Defence witness ŽEPINIĆ viewed the MUP's ethnic division as "a powder keg" that would "[a]bsolutely" result in conflict.¹²²⁰ He responded to MANDIĆ's dispatch by telling MANDIĆ and STANIŠIĆ that he did not recognise the decisions of **KARADŽIĆ** and KRAJIŠNIK.¹²²¹ On 4 April 1992, ŽEPINIĆ met with **KARADŽIĆ**, KRAJIŠNIK, KOLJEVIĆ, MANDIĆ, STANIŠIĆ and Aleksa BUHA. STANIŠIĆ told ŽEPINIĆ that he was "destroying their concept [...] to divide the MUP" to which ŽEPINIĆ responded "they would be responsible for the forthcoming conflict because it was impossible to do this peacefully."¹²²² **KARADŽIĆ** and KOLJEVIĆ accused and threatened ŽEPINIĆ, and STANIŠIĆ pulled out a gun and

¹²¹³ P2965,Art.3.

¹²¹⁴ P2965,Art.3. No Indictment Municipalities were within the territory covered by CSB Doboj, which included the municipalities of Teslić, Petrovo, Modriča, Maglaj, Doboj, Derventa, Šamac, Brod, Zavidovići and Pelagićevo. P2965,Art.3.

¹²¹⁵ P961,p.22. See III.C.3: Countdown to war.

¹²¹⁶ M.MANDIĆ:C2,p.98.

¹²¹⁷ P1116.

¹²¹⁸ P1103,p.25.

¹²¹⁹ M.MANDIĆ:C2,pp.77-79.

¹²²⁰ V.ŽEPINIĆ:T.33582-33583.

¹²²¹ V.ŽEPINIĆ:T.33601.

¹²²² V.ŽEPINIĆ:T.33601-33602.

threatened to kill ŽEPINIĆ "to prevent him causing any further headache".¹²²³ MANDIĆ then attempted to arrange ŽEPINIĆ's assassination¹²²⁴ and made a false public statement aimed at discrediting ŽEPINIĆ.¹²²⁵ ŽEPINIĆ was ultimately arrested and imprisoned by STANIŠIĆ in August 1992.¹²²⁶

333. Defence claims that by creating a separate Bosnian Serb MUP, the BSL was implementing the Cutileiro agreement¹²²⁷ are contradicted by, *inter alia*, the concrete preparations to create a separate Serb MUP commencing before the Cutileiro negotiations began,¹²²⁸ the unilateral character of MANDIĆ's dispatch, and the fact that there was no actual agreement in place that could be implemented.¹²²⁹

(ii) RS MUP role in municipality takeovers and operations to permanently remove non-Serbs

334. From early April 1992, together with civilian authorities and other Serb Forces, the RS MUP participated in the wave of takeovers and operations to consolidate or expand Bosnian Serb territory. By 18 April 1992, STANIŠIĆ declared that there were "several tens of thousands of reserve policemen, who are controlling nearly 70% of the territory of the former BiH."¹²³⁰ In October 1992, STANIŠIĆ took credit on behalf of the police for "set[ting] up most of the borders as they are today".¹²³¹ KARADŽIĆ repeatedly acknowledged the MUP's role in the takeovers, subsequently declaring before the Assembly that "we prepared our people and waged war for 45 days, before we formed an army, in 45 days we practically established the borders".¹²³² He later reiterated that:

During the first forty-five days, the people stood up to the enemy led by the [SDS], as the main political force of the Serbian people west of Serbia. The Serbian policemen, members of the Serbian MUP, who were familiar with the intentions and preparations of our

¹²²³ V.ŽEPINIĆ:T.33603-33604.

¹²²⁴ V.ŽEPINIĆ:T.33604.

¹²²⁵ V.ŽEPINIĆ:T.33614-33615.

¹²²⁶ V.ŽEPINIĆ:D2923,paras.74-78; V.ŽEPINIĆ:T.33605.

¹²²⁷ See e.g. M.STANIŠIĆ:T.46342; Č.KLJAJIĆ:D3917,para.8.

¹²²⁸ Preparations commenced at least by 11 February 1992. P1083. Cutileiro negotiations began on 13 February 1992. J.CUTILEIRO:D2968,para.5. See also Č.KLJAJIĆ:T.42192-42196; P6468,pp.3-4.

¹²²⁹ The so-called Cutileiro Agreement (P782,p.9) is a "Statement of Principles" which states, "this paper is the basis of further negotiations". D90,pp.34,43; J.CUTILEIRO:T.33955.

¹²³⁰ D4272,p.2.

¹²³¹ D4274,p.3.

¹²³² P1383,p.57.

enemy, took the impact of the first attack [...] The [TO], together with the police, managed to defend people in their homes and to endure until the [VRS] was created.¹²³³

Similarly, **KARADŽIĆ** referred to this period as the time when the armed forces of the SDS, the JNA, and the police "liberated and created the space" together.¹²³⁴ As part of these coordinated Serb Forces, the MUP were actively involved in municipality takeovers including Bratunac,¹²³⁵ Foča,¹²³⁶ Ključ,¹²³⁷ Sanski Most,¹²³⁸ Prijedor,¹²³⁹ and Zvornik.¹²⁴⁰

335. The MUP's role in implementing the common criminal purpose continued after the VRS's establishment on 12 May 1992. On 15 May 1992, **STANIŠIĆ** ordered that all MUP employees be organised into "war units", formalising VRS/MUP cooperation.¹²⁴¹

336. The MUP participated in disarmament and cleansing operations throughout the Indictment period,¹²⁴² under the direct command of MUP employees.¹²⁴³ In Sarajevo, for example, contemporaneous intercepts reflect the MUP's operational role under the BSL's close scrutiny.¹²⁴⁴

337. As discussed above, disarmament was carried out only against non-Serbs and used to disarm non-Serbs of even legally owned weapons.¹²⁴⁵ The disarmament campaign, executed, in significant part, by the CSB¹²⁴⁶ and SJBs,¹²⁴⁷ is discussed above.¹²⁴⁸

¹²³³ P5492,p.8.

¹²³⁴ P970,pp.315-317. *See also* P1383,p.13.

¹²³⁵ *See e.g.* D1524,pp.10-11.

¹²³⁶ *See e.g.* D1684.

¹²³⁷ *See e.g.* P3663,p.5.

¹²³⁸ *See e.g.* P3329,pp.10-13.

¹²³⁹ P6603; P5518; D470,p.6.

¹²⁴⁰ P3390,p.22.

¹²⁴¹ P2966; M.STANIŠIĆ:T.46480-46481. *See also* P6633; M.STANIŠIĆ:T.46482-46484;

C.NIELSEN:P2958,paras.215-216.

¹²⁴² C.NIELSEN:P2958,paras.217,380. **Bratunac**:D1524,pp.7,10-11;

M.KATANIĆ:P4374,paras.33,35; A.TEŠIĆ:D3118,paras.20-21; **Ključ**:D1352,pp.6-8;

Prijedor:D470,p.6; **Sanski Most**:P3928; **Vlasenica**:P1478,p.233; [REDACTED]

[REDACTED] **Zvornik**:P3390,pp.40,43.

¹²⁴³ C.NIELSEN:P2958,para.216.

¹²⁴⁴ *See* P5627; P5716. *See also* Ilidža Summary.

¹²⁴⁵ *See* III.C.8.(g).(ii): CSs organised and supported disarming operations.

¹²⁴⁶ D1542; D4035; D4178,p.19.

338. The disarmament of non-Serbs, which followed a similar pattern in most municipalities,¹²⁴⁹ not only rendered Bosnian Muslims and Bosnian Croats more vulnerable to harassment and subsequent attacks,¹²⁵⁰ but the process was used as a pretext for attacks and clearing of whole villages for the alleged failure of some members of the community to relinquish all weapons.¹²⁵¹ In the words of the Sanski Most "Serbian Armed Forces Command", "[a]s long as one of you has a weapon, you risk the destruction of your houses and families".¹²⁵²

339. This and other pretexts were used to justify violent operations, involving the MUP, that led to attacks on villages, accompanied by roundups, killing and destruction.¹²⁵³ For example:

- In Ilidža, the SJB participated in the April 1992 attacks on the Butmir and Hrasnica neighbourhoods.¹²⁵⁴
- In Foča, MUP forces participated in systematic attacks on Muslim neighbourhoods and villages, destroying homes and property, rounding up the population, and beating and killing civilians.¹²⁵⁵
- In Bosanski Novi, MUP forces participated in attacks beginning in May 1992 on Muslim villages, characterised by the killing and wounding of civilians, looting and the destructions of mosques and other private property.¹²⁵⁶

¹²⁴⁷ AF535; AF536; **Ključ**:P3439; P3444; **Prijedor**:P3530; P3329; D1841; D470,p.27; **Bosanski Novi**:P2632,pp.2-3; D1921,pp.1,5.

¹²⁴⁸ See III.C.8.(g).(ii): CSSs organised and supported disarming operations.

¹²⁴⁹ See e.g. **Sanski Most**: [REDACTED]; P3928. See also D1541; P2769; P3313; P3329,p.33; [REDACTED]; **Bratunac**:AF2310; M.KATANIC:P4374,para.24; M.TALOVIC:P3188,paras.13-14; M.TALOVIC:T.17654-17656; [REDACTED]; [REDACTED]; B.TEŠIĆ:D3115,paras.20-21; **Hadžići**:T.GLAVAŠ:P2296,paras.37-38; T.GLAVAŠ:T.11787; **Vlasenica**:AF2693; I.OSMANOVIC:P3212,paras.27-28; I.OSMANOVIC:T.17962-17963; P1478,p.233; S.HODŽIĆ:P3285,paras.17-18; [REDACTED]; M.ĐURIĆ:T.35012-35014; Z.JOVANOVIĆ:D3007,para.21; [REDACTED]; I.OSMANOVIC:P3212,paras.53-56.

¹²⁵⁰ See e.g. AF540.

¹²⁵¹ See e.g. **Bosanski Novi**:H.ALIĆ:P687,p.11; **Prijedor**: [REDACTED].

¹²⁵² P725,p.7. See also P3635,p.3.

¹²⁵³ See e.g. Bosanski Novi, Hadžići, Ključ, Prijedor, Sanski Most Summaries.

¹²⁵⁴ AF2573.

¹²⁵⁵ AF750-756; AF760-761; AF763-765; AF906; AF909-910; [REDACTED]; [REDACTED]; KDZ239:P3336,p.10. See also AF902-904.

- Vlasenica SJB members (including a special police platoon) engaged in combat operations in coordination with the army and Crisis Staff.¹²⁵⁷ During these operations, houses were torched and Muslims were killed, while Serb houses remained untouched.¹²⁵⁸ On 16 May 1992, Serb Forces, including SJB Milići, attacked Zaklopača killing around 80 people.¹²⁵⁹
- In Prijedor, in quick succession in May 1992, Serb Forces, including military, police and paramilitaries¹²⁶⁰ conducted a wave of attacks on non-Serb areas, killing civilians and effecting mass forcible expulsion.¹²⁶¹ Another such wave of attacks took place in late July in the Brdo area,¹²⁶² including a brutal attack on 20 July 1992 on Bišćani and surrounding hamlets.¹²⁶³ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Thereafter, people were rounded up and forcibly transported to Keraterm, Omarska and Trnopolje camps, and their villages were looted and destroyed.¹²⁶⁵
- In Ključ, SJB forces participated in combat activities and in "mopping up of the terrain".¹²⁶⁶

340. Even after the initial wave of attacks, roundups and expulsions, MUP forces continued to exert pressures on non-Serbs in furtherance of the common purpose. In September 1992, a special police detachment murdered two Muslim families in

¹²⁵⁶ P2818,p.1; P3694; P6436; AF668; AF2285-2286; R.PAŠIĆ:D3849,para.12; D1921,pp.3,5; P2632,pp.8-9; P3817,p.2; KDZ011:P3800,pp.17-21; KDZ011:T.21193-21194; P3914,paras.1.52,2.8; H.ALIC:P687,pp.11-14,19-22; KDZ011:P3800,p.27. See SIC:D.4(Bosanski Novi).

¹²⁵⁷ P6192; D3101; [REDACTED]; M.ĐURIĆ:D3093,paras.10-11.

¹²⁵⁸ [REDACTED]; SIC:A.15.1(Vlasenica); [REDACTED]; I.OSMANOVIĆ:P3212,paras.53-56; P6458;

¹²⁵⁹ SIC:A.15.2(Vlasenica).

¹²⁶⁰ AF1034.

¹²⁶¹ See SIC:A.10.1;A.10.2;A.10.3(Prijedor). See also AF1268; [REDACTED]; P2095; P2096.

¹²⁶² See SIC:A.10.5(Prijedor).

¹²⁶³ See SIC:A.10.6(Prijedor).

¹²⁶⁴ [REDACTED].

¹²⁶⁵ AF1270-1271; P3852; [REDACTED].

¹²⁶⁶ D1352,pp.7-8.

Bijeljina in an effort to create an atmosphere of fear among the remaining Bijeljina Muslims.¹²⁶⁷

(iii) RS MUP role in the detention and expulsion of non-Serbs

341. The RS MUP played a critical role in the organised detention and expulsion of Muslims and Croats. The MUP assisted in the detention, in squalid and brutal conditions, of Muslim and Croat civilians who had been arrested or rounded up, to await their expulsion or "exchange" into territory outside the RS.¹²⁶⁸ Conditions in such facilities were deplorable, and the police directly participated or acquiesced in beatings, killings, sexual violence and other forms of mistreatment against detainees.

342. MUP officers commanded and served as guards in detention facilities throughout the RS. These "undefined camps" which were, in STANIŠIĆ's words, "[left] up to the internal affairs organs"¹²⁶⁹ included facilities in Brčko,¹²⁷⁰ Ključ,¹²⁷¹ Prijedor,¹²⁷² Sanski Most,¹²⁷³ Vlasenica,¹²⁷⁴ Hadžići,¹²⁷⁵ Pale,¹²⁷⁶ and Zvornik.¹²⁷⁷ MUP officials often co-operated with VRS forces in the detention of non-Serbs, for example, in interrogating, processing, and mistreating prisoners at Omarska,¹²⁷⁸ Keraterm,¹²⁷⁹ Manjača¹²⁸⁰ and in Bosanski Novi.¹²⁸¹ MUP officers worked as guards and/or interrogators in or around VRS- and MOJ-established detention facilities such as Manjača¹²⁸² Batković,¹²⁸³ KP Dom Foča,¹²⁸⁴ and Sušica.¹²⁸⁵ MUP officers

¹²⁶⁷ AF2264; M.DAVIDOVIĆ:P2848,paras.151-152; M.DAVIDOVIĆ:T.15507,15586-15587. Defence witnesses concede this point. See D.SPASOJEVIĆ:T.35844,35848; S.MIHAILOVIĆ:T.35735-35736; P6216; M.DAVIDOVIĆ:T.15507; C.NIELSEN:P2958,para.220.

¹²⁶⁸ See III.C.6: Pattern of crimes; III.C.8.(c): Exchange Commission.

¹²⁶⁹ D447,p.7; P1096,p.3.

¹²⁷⁰ See SIC:C.7.2(Brčko)

¹²⁷¹ See SIC:C.15.1-C.15.2(Ključ).

¹²⁷² See SIC:C.20.1(Prijedor).

¹²⁷³ See SIC:C.22.1-C.22.3(Sanski Most).

¹²⁷⁴ See SIC:C.25.1-C.25.2(Vlasenica).

¹²⁷⁵ See Hadžići Summary; SIC:C.11.1(Hadžići).

¹²⁷⁶ See SIC:C.19.2(Pale).

¹²⁷⁷ See SIC:C.27.1;C.27.3;C.27.4;C.27.7(Zvornik).

¹²⁷⁸ See SIC:C.20.2(Prijedor).

¹²⁷⁹ See SIC:C.20.3(Prijedor).

¹²⁸⁰ P2639; P3734; P3720; [REDACTED]; [REDACTED]; [REDACTED];

[REDACTED]; P3752; D1867; KDZ163:P3717,pp.20-23,31-32,39-40;

C.NIELSEN:P2958,paras.290-292,315-319; R.RADINKOVIĆ:D4204,para.17. See further

SIC:C.1.2(Banja Luka).

¹²⁸¹ See SIC:C.4.1(Bosanski Novi).

¹²⁸² R.RADINKOVIĆ:D4204,para.3; [REDACTED]; P5458;

[REDACTED]. See further SIC:C.1.2(Banja Luka); Banja Luka, Sanski Most, Prijedor, Ključ Summaries.

¹²⁸³ See SIC:C.2.1(Bijeljina).

transported prisoners from municipalities including Ključ, Prijedor, and Sanski Most to Manjača.¹²⁸⁶ The RS MUP sent Muslim refugees who had fled from Foča and had been captured in Montenegro back to KP Dom.¹²⁸⁷

343. RS MUP officials participated in killing, beating and/or mistreating non-Serb detainees in detention facilities including Vlasenica SJB,¹²⁸⁸ Sušica,¹²⁸⁹ Brčko¹²⁹⁰ Prijedor¹²⁹¹ and KP Dom Foča,¹²⁹² and in other instances allowed paramilitaries and others to mistreat and kill detainees in MUP custody.¹²⁹³

344. By July 1992, the MUP had taken into custody "a large number [of] Muslim and Croatian citizens" and housed them "in various facilities such as schools, centres, factories, outdoor facilities (football stadiums) and so on".¹²⁹⁴ The vast majority of these detainees were civilians.¹²⁹⁵

345. As discussed above, such camps were formed in virtually every municipality, a pattern which by itself refutes any claim that these were local initiatives.¹²⁹⁶ Moreover, the MUP's hierarchical framework would preclude the allocation of limited resources to the archipelago of camps without republic-level awareness and oversight. Resource implications—not criminality—concerned STANIŠIĆ when he wrote to **KARADŽIĆ** on 17 July 1992 to advise of the massive roundups of Muslim civilians and their detention in poor conditions.¹²⁹⁷ Resource concerns and acceptance of the criminal nature of the system were also reflected in ŽUPLJANIN's 20 July 1992 message to STANIŠIĆ proposing to treat non-Serb males found to be of no security interest as hostages and reiterating that large number of MUP officers were

¹²⁸⁴ See SIC:C.10.1(Foča).

¹²⁸⁵ See SIC:C.25.3(Vlasenica).

¹²⁸⁶ See Ključ, Prijedor, Sanski Most Summaries.

¹²⁸⁷ See Foča Summary.

¹²⁸⁸ See SIC:C.25.1;B.18.3(Vlasenica).

¹²⁸⁹ See SIC:B.18.2;C.25.3(Vlasenica).

¹²⁹⁰ See SIC:B.5.1(Brčko).

¹²⁹¹ SIC:A.10.7;A.10.8;C.20.5;C.20.6(Prijedor).

¹²⁹² See SIC:C.10.1(Foča).

¹²⁹³ See e.g. **Zvornik**: See SIC:B.20.2;C.27.1;C.27.3(Zvornik); **Hadžići**: See SIC:C.11.2; **Sanski Most**: See SIC:B.17.1;C.22.1;C.22.2(Sanski Most).

¹²⁹⁴ P1097,p.1.

¹²⁹⁵ See III.C.6: Pattern of crimes.

¹²⁹⁶ See III.C.6: Pattern of crimes.

¹²⁹⁷ P1096,p.3.

providing security for these men "which affects the effectiveness of carrying out the public security service tasks."¹²⁹⁸

346. Police were also involved in the wider persecution of non-Serbs and their forcible transfer out of the municipality.¹²⁹⁹ In Pale, for example, police—together with paramilitary members—repeatedly came to Muslim homes and told residents that it would be better for them to leave peacefully than wait to be "chase[d]" out,¹³⁰⁰ while Pale SJB Chief Malko KOROMAN, together with KOLJEVIĆ, told local Muslims they could no longer protect them.¹³⁰¹ Pale's police then assisted¹³⁰² in the transfer of 20 busloads of people to Sarajevo, including escorting the buses.¹³⁰³ On 6 July 1992, Pale SJB Chief Malko KOROMAN reported to the MUP that 1,042 people were transferred out of Pale over the course of four days.¹³⁰⁴ Indeed, the SJB's cleansing campaign in Pale was such that Pale CS President Zdravko ČVORO complained to the Municipal Assembly that the police had "bypassed" the other civilian authorities, who wished to carry out these transfers in an "organised manner".¹³⁰⁵

(iv) Non-punishment of RS MUP perpetrators for crimes against non-Serbs

347. RS MUP officials involved in crimes against non-Serbs were neither removed from the MUP nor punished. For example, subordinates of Prijedor SJB Chief Simo DRLJAČA were widely known to have carried out the Korićanske Stijene massacre.¹³⁰⁶ Although, according to Defence witness and former Assistant Minister of Justice AVLIJAŠ,¹³⁰⁷ DRLJAČA should have been arrested, he was instead

¹²⁹⁸ P1097,p.1.

¹²⁹⁹ See e.g. C.NIELSEN:P2958,paras.198,200,203,320-329; **Prijedor**:D4224; P5503; **Ključ**:P3447; **Sanski Most**: [REDACTED]; AF1355; [REDACTED]; D470,p.8; AF2551; P3657,p.3; D4356,p.3; P10; **Bratunac**: [REDACTED]; [REDACTED]; B.TEŠIĆ:D3115,para.29.

¹³⁰⁰ S.CRNČALO:P733,paras.33-34; S.CRNČALO:T.1268-1269; AF2588.

¹³⁰¹ S.CRNČALO:P733,paras.38-39; S.CRNČALO:T.1164-1165,1250-1251.

¹³⁰² T.HRŠUM:T.32928.

¹³⁰³ See P736; P737.

¹³⁰⁴ D35/P5428(duplicates). Witness Sulejman CRNČALO explained that this was only a portion of those who were forced from the municipality. See S.CRNČALO:T.1275. See also P737.

¹³⁰⁵ D31,p.4.

¹³⁰⁶ See SIC.B.15.6(Prijedor); Prijedor Summary.

¹³⁰⁷ S.AVLIJAŠ:T.35187-35189.

rewarded and promoted, along with others involved in the mass-killings and cover up.¹³⁰⁸

348. Despite the widespread involvement of MUP officials in the unlawful detention of non-Serbs and the accompanying killings and mistreatment described above, no proper investigation into these crimes was conducted. The various reports on detention facilities that MUP prepared—which reflect one-sided inquiries and no meaningful attempt to determine the basis for detention or the maltreatment of detainees—can only be described as attempts to brush aside or whitewash the terrible crimes committed in those facilities.

349. For example, the 14-18 August 1992 Banja Luka CSB report on "prisoners, collection centres, resettlement and the role of the SJB in connection with these activities" in Prijedor, Bosanski Novi and Sanski Most¹³⁰⁹ makes no mention of the systematic crimes and deplorable conditions in detention facilities in those municipalities, despite the fact that two of its members, Ranko MIJIĆ and Jugoslav RODIĆ, worked in the camps¹³¹⁰ and a third member, Vojin BERA, visited Omarska and helped set up the interrogation teams that brutalised the detainees.¹³¹¹ While the report recommends that Omarska and Krings be "closed at once", it does not recommend any further investigation. The joint RS MUP/MOJ Commission,¹³¹² only ordered to report on the camps after they had been cleaned up or closed,¹³¹³ predictably reported the sanitised vision they saw,¹³¹⁴ again failing to mention crimes committed in those detention facilities (although noting the inadequate conditions of detention) and failing to recommend any further investigation.

(v) RS MUP failure to protect non-Serbs or investigate crimes against them

350. Given its active role in implementing the common purpose, the RS MUP's failure to investigate crimes committed against non-Serbs was predictable. STANIŠIĆ acknowledged MUP failures in investigating war crimes committed against non-

¹³⁰⁸ See Brief, paras. 521, 553-555, 567.

¹³⁰⁹ D470.

¹³¹⁰ P2640, p.1; P6536, pp.2-3; Ž.MEJAKIĆ:T.44274-44279.

¹³¹¹ KW609:P4246, p.9-10.

¹³¹² P3549.

¹³¹³ P3549, p.2; AF2489; P5461; P5460; ██████████, 46137; Ž.MEJAKIĆ:T.44273-44274;

██████████.

¹³¹⁴ Ž.MEJAKIĆ:T.44280; K.MEŠANOVIĆ:P3528, para.64. See Brief, para.529.

Serbs, attributing these failures to objective obstacles such as a lack of resources and personnel and communications problems.¹³¹⁵ His most far-fetched claim was that, because crimes against Muslims "usually took place at demarcation lines where there was combat", the victims and witnesses "went to the Muslim side" and the MUP was unable "to gather the necessary information about the perpetrators."¹³¹⁶ In fact, the evidence shows that—in accordance with **KARADŽIĆ**'s stance—the non-investigation of war crimes against non-Serbs was MUP policy.¹³¹⁷ As Ključ SJB Chief Vinko KONDIĆ reported to CSB Banja Luka: "The reason for this is, if all these crimes should be made public given the current political situation, the pressure from the international community and how advisable this is at this particular moment."¹³¹⁸

351. Although the systematic, mass crimes against non-Serbs in the months following the outbreak of the conflict was clearly the most serious crime problem in the RS, STANIŠIĆ and other MUP officials repeatedly focused MUP resources on "Muslim extremists" and "genocide against the Serbian nation".¹³¹⁹ This belies the claim that the failure to investigate crimes against non-Serbs was attributable to objective obstacles. Moreover, Defence witness claims that MUP work was impeded by poor communications were revealed as exaggerated, unsubstantiated, and untrue.¹³²⁰ In reality, the RS MUP possessed a sophisticated communications network, and there was always some way of communicating.¹³²¹

¹³¹⁵ M.STANIŠIĆ:T.46358-46363. The number of prosecutions of war crimes against non-Serbs was negligible. *See* M.STANIŠIĆ:T.46540.

¹³¹⁶ M.STANIŠIĆ:T.46384-46385.

¹³¹⁷ *See* III.D.(b): **KARADŽIĆ** propagated a policy of non-prosecution of crimes against non-Serbs; B.DERIĆ:P4982,paras.14-16.

¹³¹⁸ P2972,p.2.

¹³¹⁹ *See e.g.* D1631,pp.2,4; P6196,p.2; P2715; P6240; P6641; P3302; P6642; P2761; P3390,pp.41-44; P6197,p.4; B.MANDIĆ:T.45782-45783; C.NIELSEN:P2958,paras.236,353,366.

¹³²⁰ For example, Čedo KLJAJIĆ claimed that RSMUP had many problems including poor communications (D3917,para.12) yet, in spite of being the third-ranking RSMUP official at the time, was unaware that by 20 April 1992 the RSMUP was producing daily bulletins based on information received regularly from the CSBs. Č.KLJAJIĆ:T.42204. Similarly, after being confronted with voluminous evidence on functioning RSMUP communications, Dobrislav PLANOJEVIĆ resiled from his assertion of a total communication breakdown (D3197,para.20), admitting that there was communication between areas where there was no combat while claiming that "where we needed the communications to function the most, it didn't", while failing to specify what those areas were. D.PLANOJEVIĆ:T.36271-36273. [REDACTED]

[REDACTED] In cross-examination, KW426 was unable to specify any particular period of time in which there were no such communications and was unaware that the RSMUP produced daily bulletins of information obtained from the CSBs or that these reports regularly

352. As discussed in detail below,¹³²² paramilitary units coordinated with RS officials in the municipality takeovers and related crimes and their efforts sometimes spanned multiple municipalities and various time periods. Despite their rampant criminality, paramilitaries were not punished for their crimes against non-Serbs.¹³²³ This impunity was rooted in official policy.¹³²⁴ STANIŠIĆ told Milorad DAVIDOVIĆ that ARKAN's forces "were helping them to liberate territory that they believed should become part of [RS]",¹³²⁵ in particular mentioning Bijeljina and Zvornik. STANIŠIĆ explained that "there was an agreement with Arkan that whatever area they took they could take any property, any war booty and that would have been the price to pay for their engagement there."¹³²⁶

353. Though some Defence witnesses claimed that the crimes of the paramilitaries were a matter for the military justice system rather than the civilian justice system,¹³²⁷ the evidence shows the civilian authorities took action when they wanted. For example, the deputy commander of the Bratunac police candidly admitted that if any members of the paramilitary were arrested, they merely would be expelled to Serbia rather than prosecuted and imprisoned.¹³²⁸ In Zvornik, paramilitaries were "punished" by redeploying them to other places and in other units.¹³²⁹

354. Consistent with KARADŽIĆ's general policy of non-prosecution of crimes against non-Serbs (discussed in detail below),¹³³⁰ the RS MUP took no action in

included information obtained from the Banja Luka CSB (e.g. P2748, P2749, P2791, P2762). KW426:T.46706-46708. Prijedor SJB official Dušan JANKOVIĆ claimed that there were "quite a few periods" of no communication between the Prijedor SJB and Banja Luka CSB due in part to power cuts. When confronted with the logbook of dispatches received by the Prijedor SJB showing virtually daily communications from the Banja Luka CSB throughout 1992 (P2744), JANKOVIĆ conceded "there was no electricity, but they probably turned on the power generator when they needed to receive a dispatch." D.JANKOVIĆ:T.47340-47341.

¹³²¹ D.KEZUNOVIĆ:P2743,paras.6,10. *See further* III.C.9.(a).(ii): RSMUP communications.

¹³²² *See* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

¹³²³ *See* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

¹³²⁴ *See* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

¹³²⁵ M.DAVIDOVIĆ:P2848,para.66.

¹³²⁶ M.DAVIDOVIĆ:P2848,para.66. *See also* M.DAVIDOVIĆ:T.15465; P6639; P3174; P6640.

¹³²⁷ M.MANDIĆ:T.5101.

¹³²⁸ B.TEŠIĆ:D3115,para.30.

¹³²⁹ KARADŽIĆ's cross-examination of KDZ340 evidences his position that redeploying troublesome paramilitaries or banishing them was a way of punishing them. *See* KDZ340:T.17528-17529. *See further* III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP; Zvornik Summary.

¹³³⁰ *See* III.D.2.(b): KARADŽIĆ propagated a policy of non-prosecution of crimes against non-Serbs.

respect of such crimes committed by paramilitaries¹³³¹ and others, thereby sustaining the environment of impunity and encouraging the commission of further crimes.

(vi) KARADŽIĆ's authority and control over the RS MUP

355. **KARADŽIĆ** maintained *de facto* and *de jure* control over the RS MUP throughout the Indictment period through well-functioning lines of reporting and command running through STANIŠIĆ.

356. The MUP was a hierarchical organisation headed by STANIŠIĆ as Minister of the Interior.¹³³² Though STANIŠIĆ, as a member of the Government, was meant to formally answer to the Government¹³³³ and the Assembly,¹³³⁴ in reality he took his orders directly from **KARADŽIĆ**. As ĐERIĆ stated, "[t]he use of the police was something that the president was in charge of" and "the minister directly communicated with the president."¹³³⁵ ĐERIĆ considered that STANIŠIĆ, who was "more or less" with **KARADŽIĆ** all the time,¹³³⁶ "belonged to the president".¹³³⁷ When ĐERIĆ, as Prime Minister, sought to reassert control over STANIŠIĆ, STANIŠIĆ threatened to kill ĐERIĆ.¹³³⁸

357. STANIŠIĆ admitted implementing **KARADŽIĆ's** orders¹³³⁹ and acknowledged **KARADŽIĆ's** ability to appoint and/or remove him from office.¹³⁴⁰ As STANIŠIĆ assured the Assembly in November 1992, "I as a man have followed policies of the SDS Presidency and our Deputies in the former state, I have always followed these policies."¹³⁴¹

358. **KARADŽIĆ's** *de jure* powers complemented his *de facto* authority over the MUP. The Law on Defence empowered **KARADŽIĆ** as President to "define the basis for the organisation and size of the police force, [and] issue orders for the

¹³³¹ See III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

¹³³² C.NIELSEN:P2958,para.99. See also P2964,Arts.10,13,14,16,20,25. See also C.NIELSEN:T.16308; Z.ČVORO:T.30968-30969; [REDACTED].

¹³³³ P.TREANOR:P2536,para.208.

¹³³⁴ P.TREANOR:P2536,para.189.

¹³³⁵ B.ĐERIĆ:P4982,para.20.

¹³³⁶ B.ĐERIĆ:P4982,para.21.

¹³³⁷ B.ĐERIĆ:P4982,para.20.

¹³³⁸ B.ĐERIĆ:P4982,paras.21,21(a),23.

¹³³⁹ M.STANIŠIĆ:T.46369-46370,46403.

¹³⁴⁰ M.STANIŠIĆ:T.46440-46441.

deployment of the police in time of war, the imminent threat of war and during a state of emergency [...]"¹³⁴² The RS Presidency had declared an imminent state of war on 15 April 1992.¹³⁴³ **KARADŽIĆ** "was the supreme commander of the armed forces of Republika Srpska" which included the MUP, a force he commanded "[t]hrough the Ministry of the Interior".¹³⁴⁴

359. **KARADŽIĆ** gave effect to this *de jure* authority over the MUP throughout the Indictment period. **KARADŽIĆ**'s commanding role over the MUP from the very start of the conflict is illustrated by intercepted conversations from April/May 1992, which show that **KARADŽIĆ** was often in contact with STANIŠIĆ and even lower-level commanders. For example:

- On 18 April, **KARADŽIĆ** received a briefing from STANIŠIĆ as a commander speaking to a subordinate, issuing him instructions;¹³⁴⁵
- On 22 April, **KARADŽIĆ** received an update from somebody in the MUP facility at Vraca, near Sarajevo; the two agreed that targets in the city would have to be hit with hand rocket launchers;¹³⁴⁶
- On 23 April, **KARADŽIĆ** instructed PEJIĆ, a MUP officer in Vraca, that they "must not initiate any attacks" due to the imminent signing of a cease-fire; PEJIĆ affirmed, calling **KARADŽIĆ** "Mr. President";¹³⁴⁷
- On 24 April, after **KARADŽIĆ** received a situational update from MUP commander Milenko KARIŠIĆ, he told KARIŠIĆ not to "retaliate until you are threatened, until you are in danger" because of the presence of European Union monitors.¹³⁴⁸

¹³⁴¹ P1105,p.15; *See also* V.ŽEPINIĆ:T.33598.

¹³⁴² P2602,Art.7. *See also* M.MANDIĆ:T.5104; B.ĐERIĆ:P4982,para.25; M.STANIŠIĆ:T.46577-46578.

¹³⁴³ P3922. *See also* P2412; AF492; AF2159.

¹³⁴⁴ M.MILOVANOVIĆ:T.25444-25445. *See also* P6510,p.14; M.STANIŠIĆ:T.46436-46437,46481,46484.

¹³⁴⁵ P5606.

¹³⁴⁶ P5702.

¹³⁴⁷ D920.

¹³⁴⁸ D3755. *See also* P2645; P1503.

360. **KARADŽIĆ**'s active command over the MUP continued through 1995, as evidenced, for example, by **KARADŽIĆ**, in March 1995:

- issuing an order to the Minister of the Interior regarding the stationing of MUP units in Konjević Polje;¹³⁴⁹
- ordering complete mobilisation of the VRS and MUP;¹³⁵⁰
- issuing combat orders to the VRS and MUP to "transfer 1,500 manoeuvre-brigade soldiers to Kladanj" and to "set up ambushes immediately" along the Vlasenica-Zvornik road.¹³⁵¹ A MUP special police detachment was deployed consistent with this order the following day.¹³⁵²

361. As discussed below,¹³⁵³ a well-functioning communications system kept **KARADŽIĆ** and other JCE members in the BSL informed of MUP activities throughout the conflict.

(vii) **KARADŽIĆ** rewarded and commended RS MUP personnel

362. As discussed in detail below, **KARADŽIĆ**, **STANIŠIĆ** and other JCE members knew that RS MUP personnel were committing and failing to suppress crimes against non-Serbs, but took no genuine steps to put in check this force that they had conceived, created and commanded.¹³⁵⁴ Instead, **KARADŽIĆ** honoured and commended MUP personnel¹³⁵⁵ and publicly praised them for "liberat[ing] and creat[ing] the space."¹³⁵⁶ These commendations demonstrate that **KARADŽIĆ** valued MUP contributions to the common purpose and intended the resulting ethnic separation effected through the commission of massive and widespread crimes.

¹³⁴⁹ P329.

¹³⁵⁰ P2248.

¹³⁵¹ P2252.

¹³⁵² P4497. For other command orders issued by **KARADŽIĆ** to the RSMUP during that period, see P4923; P889; P2994, which was implemented in P2995 and P2996. See also C.NIELSEN:T.16312-16313; T.KOVAČ:D3960,para.115.

¹³⁵³ See III.C.9.(a).(ii): RSMUP communications.

¹³⁵⁴ See III.D.2: **KARADŽIĆ** failed to prevent common purpose crimes or punish the perpetrators.

¹³⁵⁵ P4261; D1524; P2978. See further III.D.2.(c): **KARADŽIĆ** rewarded perpetrators of crimes against non-Serbs.

¹³⁵⁶ P970,pp.315-317. See also P1383,p.13.

(i) VRS

363. **KARADŽIĆ** was the Supreme Commander of the VRS, a powerful vehicle for implementing the policies and goals of the BSL and the common purpose. As **KARADŽIĆ** affirmed, the VRS was "the highest strategic organisational formation of the Serbian people in [the] former [BiH], capable of realising the strategic and other tasks assigned to it by the Supreme Command."¹³⁵⁷ These assigned tasks were implemented. As MLADIĆ stated with satisfaction in 1993, the army had carried out "most of [the] tasks, and strategic goals, set to them."¹³⁵⁸

364. The VRS was formed from the existing structures of the JNA in BiH and followed JNA military doctrine and principles of command and control.¹³⁵⁹ Existing JNA units, TO units and other armed groups¹³⁶⁰ were renamed and transformed into VRS commands and units.¹³⁶¹ When the JNA pulled out of BiH on 19 May 1992, it left the Bosnian Serbs with a nearly complete and trained army supplied with equipment from the former JNA 2nd Military District.¹³⁶² This transformation of the JNA into an army for the Bosnian Serbs had been discussed and coordinated between the BSL, particularly **KARADŽIĆ**, and the political and military leadership in Belgrade, including MILOŠEVIĆ.¹³⁶³ The latter ensured that the Bosnian Serb army received significant support from Serbia and the FRY even after the JNA's withdrawal in order to achieve the "unification of Serbian lands".¹³⁶⁴

(i) VRS structure and mission

¹³⁵⁷ D325,p.7. For details on the VRS's establishment and legal framework, *see* R.THEUNENS:P3033,pp.287-297.

¹³⁵⁸ P1379,p.66.

¹³⁵⁹ *See* R.THEUNENS:P3033,pp.13,264-265,310-315.

¹³⁶⁰ *See* III.C.8.(j): JNA/VJ; III.C.8.(k): TO; P1634,p.23.

¹³⁶¹ R.THEUNENS:P3033,pp.315-318,443-444; R.THEUNENS:T.16839-16840,16896-16897; P3035; P3055; D325,pp.7,13-14,47,69-70,75-77,127-128,133,158; E.BROWN:P3914,pp.32-33,68-75.

¹³⁶² R.THEUNENS:P3033,pp.244-251,291; D325,pp.69-70; P979; P148; P5477; P3055; A.VASILJEVIĆ:D3065,para.192; A.VASILJEVIĆ:T.34691-34692; P6170,pp.3,9.

¹³⁶³ R.THEUNENS:P3033,pp.244-251. *See also* P979; P148; P3035; P1477,pp.260-262; R.DONIA:P973,pp.44-47.

¹³⁶⁴ P1481,pp.279-297; P1482,pp.40,44-45; P1483,pp.164-180; P1484,pp.19-29; R.THEUNENS:P3033,pp.480-492; R.THEUNENS:T.16870-16873,16876; P3048,pp.5-11,13; P3049,pp.1-8,13,31-34,36-38; A.VASILJEVIĆ:D3065,para.213; A.VASILJEVIĆ:T.34679.

365. The core of the VRS-GŠ was established on 3 May 1992 "pursuant to a decision of the Assembly of the Serbian People and the tacit consent of the competent organs of the Main Staff of the Army of the FRY".¹³⁶⁵

366. As discussed above,¹³⁶⁶ at the 16th Assembly on 12 May 1992, the VRS's establishment was formally announced. On **KARADŽIĆ**'s recommendation,¹³⁶⁷ MLADIĆ was appointed VRS-GŠ Commander. On 15 December 1992, **KARADŽIĆ**, (re)appointed MLADIĆ as "Commander of the Main Staff of the Army of Republika Srpska". MLADIĆ remained VRS-GŠ Commander until 8 November 1996.¹³⁶⁸

367. The VRS cast itself as the force behind the "fight for the survival of Serbdom" and bulwark between the Serbian people and an imminent "genocide against the Serbian people."¹³⁶⁹

368. The VRS-GŠ was the highest command and control body within the VRS.¹³⁷⁰ The Law on the Army instructed the VRS-GŠ Commander to command the Army in compliance with the authority delegated to him by the President of the Republic and, as such, MLADIĆ issued orders, instructions and other documents to implement the duties assigned to him by **KARADŽIĆ**.¹³⁷¹

369. Soon after the VRS's establishment, the VRS-GŠ took measures to remove Muslims and Croats from commanding positions.¹³⁷²

370. As discussed above,¹³⁷³ the VRS worked closely with the MUP.¹³⁷⁴ Police units were subordinated to the VRS for combat operations "established in advance by the commander-in-[]chief or the Minister of the Interior".¹³⁷⁵

¹³⁶⁵ D325,pp.69-70.

¹³⁶⁶ See III.C.5.(a): The strategic objectives as articulated at the 16th Assembly.

¹³⁶⁷ P970,p.317. See also P1477,p.292.

¹³⁶⁸ See R.THEUNENS:P3033,pp.287,291-293.

¹³⁶⁹ R.THEUNENS:P3033,pp.287,293-297; D325,pp.7,13,45,47-48,69,152,158.

¹³⁷⁰ D325,p.158; R.THEUNENS:P3033,p.313.

¹³⁷¹ P2603; R.THEUNENS:P3033,pp.311-312.

¹³⁷² R.THEUNENS:P3033,pp.289,319-320; P5469.

¹³⁷³ See III.C.8.(h).(ii): RSMUP role in municipality takeovers and operations to permanently remove non-Serbs.

¹³⁷⁴ E.BROWN:P3914,pp.75-81; R.THEUNENS:P3033,pp.288,314-315,361,434; R.THEUNENS:T.16889-16891; P192,p.3; P4923; P3052; P2246,p.7.

¹³⁷⁵ R.THEUNENS:P3033,p.314; See also P4923.

371. Throughout the conflict, the VRS also cooperated with Serbian MUP special forces, RSK military and police units, and volunteer and paramilitary formations from Serbia and RSK, and received volunteers from outside BiH into its units.¹³⁷⁶

(ii) The VRS implemented the common criminal purpose

372. From its establishment, the VRS—both independently and in cooperation and coordination with CSs and other Bosnian Serb Forces—played a key role in operations to permanently and forcibly remove non-Serbs from Serb-claimed territory.

373. Across BiH, the VRS participated in operations to disarm and permanently, forcibly remove non-Serbs, during which hundreds of non-Serb civilians were killed, homes were looted and burned, and cultural property destroyed.¹³⁷⁷ By early June 1992—just weeks after its establishment—the VRS had attacked and killed civilians in locations including Pudín Han and Prhovo in Ključ,¹³⁷⁸ Kozarac and Kamičani in Prijedor,¹³⁷⁹ Ahatovići in Novi Grad,¹³⁸⁰ and Vrhpolje and Hrustovo in Sanski Most.¹³⁸¹ These attacks continued over the following weeks and months, including in Mješaja/Trošanj village in Foča,¹³⁸² Biljani in Ključ,¹³⁸³ Novoseoci in Sokolac,¹³⁸⁴ and a wave of attacks throughout June and July in Prijedor.¹³⁸⁵

374. Within days of its establishment, for example, the VRS led the takeover of Rogatica, which was planned and executed by SRK Commander Tomislav ŠIPČIĆ, in coordination with KUŠIĆ's SRK Rogatica Brigade.¹³⁸⁶ Following the initial shelling, soldiers used grenades, machine guns, tanks, fire and dogs to flush out Muslim civilians from where they were hiding.¹³⁸⁷ A large number of civilians were killed

¹³⁷⁶ E.BROWN:P3914,pp.81-86; R.THEUNENS:P3033,pp.282,320-329,420-424; P2855; P2888; P5489. See III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

¹³⁷⁷ See e.g. SIC:A5.4;A.7.1-A.7.3;A.10.1-A.10.6;A.10.9;A.12.1-A.12.4;A.13.1;B.10.1;D.2;D.4;D.17;D.20(Bijeljina; Bosanski Novi; Foča; Ključ; Prijedor; Sanski Most; Sokolac). See also Bosanski Novi, Foča, Ključ, Prijedor, Sanski Most, Sokolac, Rogatica Summaries.

¹³⁷⁸ See SIC:A.7.1;A.7.2(Ključ).

¹³⁷⁹ See SIC:A.10.1;A.10.3(Prijedor).

¹³⁸⁰ See e.g. SIC:A.9.1(Novi Grad).

¹³⁸¹ See e.g. SIC:A.12.1-A.12.2(Sanski Most).

¹³⁸² See e.g. SIC:A.5.4(Foča).

¹³⁸³ See e.g. SIC:A.7.3(Ključ).

¹³⁸⁴ See e.g. SIC:A.13.1;A.14.2(Sokolac; Višegrad).

¹³⁸⁵ See e.g. SIC:A.10.2;A.10.4-A.10.6;A.10.9(Prijedor).

¹³⁸⁶ See Rogatica Summary.

¹³⁸⁷ A.ISAKOVIĆ:P127,p.4.

during these operations, including several elderly women who were burned in their homes.¹³⁸⁸ GALIĆ later congratulated KUŠIĆ and the Rogatica Brigade for the "great and immeasurable contribution" made to the VRS's "magnificent successes in 1992".¹³⁸⁹

375. Equally, as 1KK 6th Brigade Commander Col. BASARA recorded, the 6th Brigade "prepared the way for the seizure of power and secured the take-over of the territory of [...] Sanski Most and Ključ", and took part in "[c]lashes" in Prijedor.¹³⁹⁰ In Sanski Most, this meant, for example, participating in a CS-coordinated joint operation with police and paramilitaries¹³⁹¹ to 'disarm' Muslim neighbourhoods in late May, resulting in "the capture of 2000 civilians, but no significant amount of weapons".¹³⁹² In subsequent 6th Brigade attacks on Muslim villages, men were forced to jump off the Vrhpolje bridge into the Sana River while VRS soldiers opened fire upon them,¹³⁹³ and women and children were killed when soldiers fired into the garage where they were sheltering.¹³⁹⁴ In Prijedor, this meant, for example, an attack on the village of Briševo, during which at least 68 people were killed, over 100 homes were burned down or damaged, and the Catholic Church was destroyed.¹³⁹⁵

376. In Vlasenica, VRS members participated in a coordinated action with the TO and police in Drum, [REDACTED]. [REDACTED] The Ključ Brigade, under first 1KK then 2KK command,¹³⁹⁷ participated in "*čišćenje*" operations in Velagići and Biljani during which over 200 Muslim civilians were rounded up and shot.¹³⁹⁸ In Sokolac, members of the SRK 2nd Romanija Motorised Brigade under KRSTIĆ's command executed 44 men and boys in Novoseoci.¹³⁹⁹ Engineers from the Brigade destroyed the Novoseoci mosque and used the rubble to bury the victims at a municipal garbage dump.¹⁴⁰⁰

¹³⁸⁸ P3283; [REDACTED].

¹³⁸⁹ P6108. *See also* M.UJIĆ:T.33474.

¹³⁹⁰ P3660, paras.6-7.

¹³⁹¹ *See* Sanski Most Summary.

¹³⁹² P3928, p.1.

¹³⁹³ *See* SIC:A.12.1(Sanski Most).

¹³⁹⁴ *See* SIC:A.12.2(Sanski Most).

¹³⁹⁵ *See* SIC:A.10.9(Prijedor).

¹³⁹⁶ [REDACTED] *See* SIC:A.15.1(Vlasenica).

¹³⁹⁷ P3914, para.1.95.

¹³⁹⁸ *See* SIC:A.7.3;B.10.1(Ključ).

¹³⁹⁹ *See* SIC:A.13.1(Sokolac).

¹⁴⁰⁰ *See* SIC:D.20(Sokolac).

377. The VRS brought masses of non-Serbs captured during such operations to the many civilian- or military-run camps,¹⁴⁰¹ such as Kula,¹⁴⁰² the Pale Culture Centre,¹⁴⁰³ and Mlakve football stadium.¹⁴⁰⁴ The VRS provided guards and interrogators to non-VRS-operated camps,¹⁴⁰⁵ and VRS soldiers mistreated and killed detainees at camps such as Keraterm, Omarska and Trnopolje.¹⁴⁰⁶ For example, VRS soldiers participated in the Room 3 massacre at Keraterm, killing over 150 people.¹⁴⁰⁷

378. Pursuant to MLADIĆ's orders,¹⁴⁰⁸ the VRS set up its own detention camps, including Batković in Bijeljina¹⁴⁰⁹ and Manjača in Banja Luka.¹⁴¹⁰ Other VRS camps included Rasadnik in Rogatica,¹⁴¹¹ Miška Glava Dom and the military barracks in Prijedor;¹⁴¹² and Slaviša Vajner Čiča barracks in Novo Sarajevo.¹⁴¹³ While ostensibly established for PoWs,¹⁴¹⁴ the vast majority of detainees in these camps were civilians.¹⁴¹⁵

379. VRS soldiers who guarded these camps subjected detainees to interrogations; beatings, mistreatment and torture; rape and sexual humiliation; unhygienic conditions; overcrowding; and lack of shelter, food, water and medical treatment.¹⁴¹⁶

██████████ Detainees were used for forced labour on the frontlines,¹⁴¹⁸ or as human shields.¹⁴¹⁹ The beatings and unbearable conditions often resulted in deaths, and many

¹⁴⁰¹ See e.g. P1096,p.3.

¹⁴⁰² See SIC:C.18.2(Novo Sarajevo).

¹⁴⁰³ See SIC:C.19.2(Pale).

¹⁴⁰⁴ See SIC:C.4.1(Bosanski Novi).

¹⁴⁰⁵ See e.g. SIC:C.18.2;C.20.2;C.20.4(Ilidža; Prijedor).

¹⁴⁰⁶ See e.g. SIC:B.14.1;B.15.1-B.15.2;B.15.5;C.10.5;C.10.7;C.19.2(Foča; Pale; Prijedor).

¹⁴⁰⁷ See SIC:B.15.1(Prijedor).

¹⁴⁰⁸ P3731.

¹⁴⁰⁹ See SIC:C.2.1(Bijeljina). See also Bijeljina Summary.

¹⁴¹⁰ See SIC:C.1.2(Banja Luka). See also Banja Luka Summary.

¹⁴¹¹ See SIC:C.21.3(Rogatica).

¹⁴¹² See SIC:C.20.5;C.20.7(Prijedor).

¹⁴¹³ See SIC:C.18.1(Novo Sarajevo).

¹⁴¹⁴ P3731.

¹⁴¹⁵ See III.C.6: Pattern of crimes. See also Banja Luka, Bijeljina, Foča Summaries; SIC:C.10.1(Foča).

¹⁴¹⁶ See e.g. SIC:C.1.2;C.2.1;C.10.1;C.10.2;C.10.4;C.18.1;C.20.5;C.20.7;C.21.3(Banja Luka; Bijeljina; Foča; Novo Sarajevo; Prijedor; Rogatica). See also Banja Luka, Foča Summaries.

¹⁴¹⁷ ██████████

¹⁴¹⁸ See e.g. SIC:C.2.1;C.18.1;C.21.1;C.21.3;C.26.1(Bijeljina; Novo Sarajevo; Rogatica; Vogošća).

¹⁴¹⁹ See e.g. SIC:B.16.2(Rogatica).

detainees were summarily executed or simply disappeared.¹⁴²⁰ Over 200 Muslim detainees were killed at KP Dom Foča alone.¹⁴²¹

(iii) KARADŽIĆ's command and control authority over the VRS

380. For the entirety of the conflict, **KARADŽIĆ** was the VRS Supreme Commander. He remained in ultimate control as evidenced from documents, witnesses¹⁴²² and statements made by VRS members and **KARADŽIĆ** himself. As **MLADIĆ** stated at the 16th Assembly session, "the President of the Serbian Republic of Bosnia and Herzegovina should have command and control over the army".¹⁴²³ VRS-GŠ member **GVERO** outlined the army's understanding of the chain of command a few months later, stating that (a) the President of the Republic (or Presidency) is the Supreme Commander; (b) all elements of the army are subordinated to the Supreme Commander; (c) this chain of command was fully observed.¹⁴²⁴

381. Three years later, **MLADIĆ** and the VRS-GŠ confirmed the same structure. At the 14th Supreme Command session in late March 1995, **MLADIĆ** pointed out that he and **KARADŽIĆ** had the greatest responsibility for the army, "as the Supreme Commander" and **MLADIĆ** as "[his] right hand man in the army,"¹⁴²⁵ while **MILOVANOVIĆ** observed that it was the Supreme Commander **KARADŽIĆ** who had the ultimate say and that the VRS would follow an order from **KARADŽIĆ** even if it was contrary to a previous order from **MLADIĆ**.¹⁴²⁶

382. That was affirmed by VRS-GŠ members during trial. General **MILOVANOVIĆ** explained succinctly that "[t]he one and only superior of General Ratko Mladić was Dr. Radovan Karadžić, president of the republic. [...] Dr. Radovan

¹⁴²⁰ See e.g. SIC:B.1.1-B.1.2;B.1.4;B.2.1;B.8.1;B.16.1-B.16.2;C1.2;C.2.1;C.10.1;C.18.1;C.20.5;C.21.2-C.21.3(Banja Luka; Bijeljina; Foča; Novo Sarajevo; Prijedor; Rogatica). See also Banja Luka Summary.

¹⁴²¹ See SIC:B.8.1(Foča).

¹⁴²² J.WILSON:P1029,paras.133-136; H.OKUN:P776,pp.51-52; A.BANBURY:P2451,paras.27,112; A.BANBURY:T.13313,13346-13350, with reference to P2464, P2459; R.SMITH:T.11302-11304,11418-11420; D.HARLAND:P820,paras.38-39,51,54,114; D.HARLAND:T.2029-2030, with reference to P4786,p.2; M.ROSE:P1638,paras.100,207,211-212; M.ROSE:T.7259-7260,7262,7596;

¹⁴²³ P956,p.41.

¹⁴²⁴ D422,pp.63-64.

¹⁴²⁵ P3149,p.49.

¹⁴²⁶ B.SUBOTIĆ:T.40061.

Karadžić was the supreme commander of the armed forces of Republika Srpska."¹⁴²⁷
 General SKRBIC similarly confirmed that **KARADŽIĆ** was the Supreme Commander in both peacetime and war time.¹⁴²⁸

383. **KARADŽIĆ** himself repeatedly underscored his position at the apex of the military system. As he told the Assembly in March 1994:

I am in charge, in particular, of the Army [...] Commanders report to me—the Commander of GŠ, GŠ /sic/ and commanders of corps and brigades [...] I established a Supreme Command so that I do not make decisions by myself. I did not establish it to use it as a cover. I am the one who signs, who decides, and I will be responsible for each decision.¹⁴²⁹

Likewise, in 1995 **KARADŽIĆ** declared: "As the supreme commander and the president of this state, I can only say that everyone would like to have such associates as I have had at the Presidency, Assembly, Government, such generals in the armed forces as Ratko MLADIĆ, Manojlo MILOVANOVIĆ, Main Staff members, corps commanders, MUP special unit commanders".¹⁴³⁰ Similarly praising MLADIĆ while simultaneously making clear who was in charge, **KARADŽIĆ** told the Assembly in 1993, "[i]f I would not trust General Mladić I would have dismissed him."¹⁴³¹

384. **KARADŽIĆ** had extensive *de jure* powers as President. In addition to serving as the Army's "commander-in-chief",¹⁴³² with authority to "command the Army",¹⁴³³ the President defined the organisation of the Army; established the system of Army command and monitored its implementation; decided on the deployment of the Army during war; and executed other specified and unspecified command functions so long as consistent with the law and Constitution. While the President could delegate certain command duties to the VRS-GŠ Commander, the Commander remained responsible to the President for these duties.¹⁴³⁴

¹⁴²⁷ T.25444.

¹⁴²⁸ T.26023-26024.

¹⁴²⁹ P1388,p.85. *See also* R.THEUNENS:T.16844-16845.

¹⁴³⁰ P953,p.10. *See also* P1371,p.9.

¹⁴³¹ P1379,p.316.

¹⁴³² P2603,p.24,Art.174.

¹⁴³³ P2603,p.24,Art.174. *See also* P2602,p.2.

¹⁴³⁴ P2603. *See also* R.THEUNENS:P3033,pp.298-310.

385. Thus, by law, **KARADŽIĆ**, as President or as President of the Presidency who was explicitly given charge of military matters,¹⁴³⁵ was the person to whom the VRS-GŠ was "directly subordinated".¹⁴³⁶

386. Throughout the relevant period, **KARADŽIĆ** used his *de jure* powers by promoting, (re-)assigning or relieving senior VRS officers from duty,¹⁴³⁷ such as: the promotion to Major General of SRK Commander Colonel GALIĆ (December 1992),¹⁴³⁸ SRK Commander Colonel MILOŠEVIĆ (March 1994)¹⁴³⁹ and DK Commander ŽIVANOVIĆ (July 1993);¹⁴⁴⁰ the promotion of MLADIĆ on 28 June 1994;¹⁴⁴¹ and the re-assignments on 14 July 1995 of General KRSTIĆ and Col. ANDRIĆ to DK Commander and Chief of Staff respectively.¹⁴⁴²

387. As Supreme Commander, **KARADŽIĆ** decided whether to declare a state of war and ordered general mobilisations a number of times between October 1994 and July 1995.¹⁴⁴³

388. **KARADŽIĆ** was not reluctant to invoke his authority as Supreme Commander. In 1993, when the *Lukavac 93* operation triggered concerns within the international community to the extent that air strikes became imminent, **KARADŽIĆ** reminded MILOVANOVIĆ of the chain of command: "I am supreme commander and I am ordering; order them to withdraw and tell MLADIĆ to report to me from the airport."¹⁴⁴⁴ Learning that MLADIĆ was in a meeting, **KARADŽIĆ** said, "release this order immediately, inform MLADIĆ and tell him that [...] the order must be

¹⁴³⁵ D440,p.3; P.TREANOR:P2536,para.267.

¹⁴³⁶ P3035,p.3.

¹⁴³⁷ See R.THEUNENS:P3033,pp.503-506.

¹⁴³⁸ P2650.

¹⁴³⁹ P2677.

¹⁴⁴⁰ P5532.

¹⁴⁴¹ P3046.

¹⁴⁴² P3044. According to P4485, the handover of duties took place on 13 July 1995. This difference in date may be a drafting oversight in either of the documents or be based on an underlying urgency as the document text suggests. In any event the document makes reference to the Presidential Decree as basis for the reassignment and can by no means be understood as MLADIĆ overruling the President's decision and disregarding **KARADŽIĆ**'s authority as RADINOVIĆ claimed in his report. R.RADINOVIĆ:D3864,para.113.

¹⁴⁴³ R.THEUNENS:P3033,pp.506-510; P2248; P5482; P2249; P2998; P5546; P5192. See also P1385,p.96.

¹⁴⁴⁴ P4786,p.2

carried out [...] MLADIĆ has to carry out every one of my orders; if he hasn't, I will replace him and arrest him."¹⁴⁴⁵

389. **KARADŽIĆ** confirmed his exercise of command and control over the VRS when he emphasised in the Combat Readiness Report that no actions were taken by the VRS-GŠ without his approval.¹⁴⁴⁶

390. MILOVANOVIĆ confirmed **KARADŽIĆ**'s supreme authority over the VRS at trial, in response to **KARADŽIĆ**'s question about a "two-headed" command structure: "command and control of the army during the war was not two-headed [...] and that is mainly thanks to the Main Staff. We remained under your personal command".¹⁴⁴⁷

391. MLADIĆ accepted the *de jure* subordination. In his own words in 1993:

I have never taken any decision by myself even though I look a bit autocratic. There is nothing that the Main Staff and me personally have done without the complete agreement. And I have to say here that all claims about some rift in military and political leadership are untrue. Military leadership cannot be paraleadership to the political leadership.¹⁴⁴⁸

392. **KARADŽIĆ**'s firm control over MLADIĆ continued throughout the relevant period.¹⁴⁴⁹

a. **KARADŽIĆ**'s strategic direction to the VRS

393. As **KARADŽIĆ** once explained, "I rarely occupy myself with tactical matters. My role is about the strategic usage of the army, but only in situations when things go wrong."¹⁴⁵⁰ Although he understated his tactical interventions, his emphasis on strategic direction reflected a significant aspect of his commanding role over the VRS.

¹⁴⁴⁵ P4786,pp.2-3.

¹⁴⁴⁶ D325,p.153.

¹⁴⁴⁷ M.MILOVANOVIĆ:T.25632.

¹⁴⁴⁸ P1379,p.72. *See also* p.274.

¹⁴⁴⁹ P970,pp.315,369.

¹⁴⁵⁰ P1379,p.255.

394. All VRS operations were guided by the strategic objectives formulated by the BSL and **KARADŽIĆ**.¹⁴⁵¹ **KARADŽIĆ** announced those objectives at the same time the VRS was established; the VRS-GŠ translated the strategic objectives into missions and operations.¹⁴⁵²

395. As discussed above, the strategic objectives were developed by members of the BSL and Serbian leadership, including **MLADIĆ**.¹⁴⁵³ Throughout the conflict, **MLADIĆ** repeatedly affirmed that the VRS's tasks "stem[med] from the known six strategic objectives".¹⁴⁵⁴ **MILOVANOVIĆ** also affirmed that the six strategic objectives were the VRS's military objectives.¹⁴⁵⁵

396. Following **KARADŽIĆ**'s enunciation of the strategic objectives to the Assembly, it was understood that they were to be pursued militarily, while the BSL worked to translate military successes and conquests into political agreements through negotiations.¹⁴⁵⁶ **KARADŽIĆ** and **KRAJIŠNIK** periodically reminded the Assembly of the objectives that had been achieved through the military efforts, but that still awaited a diplomatic resolution.¹⁴⁵⁷

397. **KARADŽIĆ** and **KRAJIŠNIK** also reminded **MLADIĆ** and the VRS of the need to achieve the strategic objectives. Thus, only two weeks after they were enunciated, **KARADŽIĆ** reminded **MLADIĆ** that "We must have: Corridor in the Posavina, Part of Sarajevo, Operations group at the Drina."¹⁴⁵⁸ He also noted that if there was a sufficient response to mobilisation into the 1KK, "then we clear the Posavina of Croats."¹⁴⁵⁹

398. In a 6 June 1992 meeting between political and military leaders where "the political and military doctrine for upcoming war objectives" was discussed, **KARADŽIĆ** emphasised that the Assembly defined the strategic aims and explained

¹⁴⁵¹ P970,pp.21-22. *See further* III.C.5: Formalisation of ethnic separation at the 16th Assembly and establishment of VRS to implement.

¹⁴⁵² D325,p.159.

¹⁴⁵³ *See* III.C.5: Formalisation of ethnic separation at the 16th Assembly and establishment of VRS to implement.

¹⁴⁵⁴ P970,p.22; P1379,p.66.

¹⁴⁵⁵ D825,p.13; D2149,p.27.

¹⁴⁵⁶ *See e.g.* D92,pp.70-71. *See further* III.C.5.(c): The strategic objectives were transformed into concrete results on the ground.

¹⁴⁵⁷ *See e.g.* P1385,p.108.

¹⁴⁵⁸ P1478,p.42.

¹⁴⁵⁹ P1478,p.41.

that "we have to protect our territories militarily" and that "[t]he birth of a state and the creation of borders does not occur without war."¹⁴⁶⁰

399. Again, at a military consultation with **KARADŽIĆ**, **KRAJIŠNIK**, **MLADIĆ** and the commanders of the corps in September, **KRAJIŠNIK** reminded the commanders that "[o]ur aim is to divide with the Muslims" and enunciated all six strategic objectives.¹⁴⁶¹

400. By November 1992, as discussed earlier, Bosnian Serb Forces held approximately 70 per cent of the territory of BiH. At yet another **KARADŽIĆ**, **KRAJIŠNIK** and **MLADIĆ** meeting with the corps commanders on 8 November, **KARADŽIĆ** and **KRAJIŠNIK** reminded the commanders that, despite their successes, they had only implemented some of the strategic objectives and failed to implement others.

401. Both **KARADŽIĆ** ("The army and our courageous officers contributed enormously to the results that we have achieved to date")¹⁴⁶² and **KRAJIŠNIK** ("I admire the military successes—It is very dangerous to seize their territories.")¹⁴⁶³ praised VRS accomplishments. Nevertheless, **KRAJIŠNIK** reminded them, "We have a disproportionate engagement of the army in relation to the strategic objectives".¹⁴⁶⁴ While the VRS had achieved the corridor and separation with the Muslims, "We have not achieved: *The Neretva, *The sea and *The Podrinje area."¹⁴⁶⁵ Telling **MLADIĆ** and the corps commanders that "the Muslims must not stay with us and they should not be given any kind of autonomy," **KRAJIŠNIK** stated that "the most important objective is the task assigned to **ŽIVANOVIĆ**—the [*čišćenje*—cleansing/mopping up] of the Drina."¹⁴⁶⁶

402. As discussed above and below, this "most important" current task was duly reflected in Directive 4, issued shortly afterward, as the VRS responded directly to the BSL's admonition about failures in implementing the strategic objectives.

¹⁴⁶⁰ P1478, pp.94-97. See also P1477, pp.262-263.

¹⁴⁶¹ P1479, pp.143-144; P6518, p.39.

¹⁴⁶² P1481, p.145.

¹⁴⁶³ P1481, p.146.

¹⁴⁶⁴ P1481, pp.146-147.

¹⁴⁶⁵ P1481, p.147.

¹⁴⁶⁶ P1481, p.147.

403. Astoundingly, **KARADŽIĆ** argued throughout the trial that the six strategic objectives were not objectives to be implemented militarily by the VRS but rather exclusively political goals that had allegedly already been agreed by the international community during the Cutileiro negotiations, and called Defence witnesses¹⁴⁶⁷—including his military expert RADINOVIĆ¹⁴⁶⁸—who testified to this effect. This denial, in the face of the evidence cited above and elsewhere, merely underscores **KARADŽIĆ**'s awareness that the strategic objectives unmistakably reflect his strategic direction of his army's operations.

b. Directives

404. As indicated above, **KARADŽIĆ** and the BSL not only provided broad strategic direction to the VRS through the six strategic goals,¹⁴⁶⁹ but **KARADŽIĆ** exercised more direct command and control over the VRS throughout the relevant period. As discussed below (and alluded to above), he was involved in the planning and coordination of military operations, commanded the VRS through written and oral orders, commands and directives,¹⁴⁷⁰ was kept informed about the outcome of operations and took corrective action to address shortcomings in the implementation of his orders.¹⁴⁷¹

405. Directives were the main documents used to regulate the use of forces.¹⁴⁷² Seven fundamental directives for VRS military operations were issued from June 1992 to March 1995.¹⁴⁷³ These directives not only explicitly reflected the VRS attempts to implement the strategic objectives but, as discussed below, reflected **KARADŽIĆ**'s direct oversight and command of the VRS via the directives. As

¹⁴⁶⁷ M.KRAJIŠNIK:T.43301-43302; M.BULATOVIĆ:D3051,para.19. *See also* T.17067,21727-21739,21671,33102,16761.

¹⁴⁶⁸ R.RADINOVIĆ:D3864,paras.139-145,152-153,155-157,174,176; R.RADINOVIĆ:T.41447. RADINOVIĆ asserted that the strategic objectives were not adopted at the 16th Assembly (D3864,para.141), despite clear contrary statements by both **KARADŽIĆ** (P1379,p.14) and KRAJIŠNIK (P1383,p.12).

¹⁴⁶⁹ D325,pp.153,158.

¹⁴⁷⁰ In relation to the categories of combat documents in particular directives, *see* R.THEUNENS:P3033,pp.85-89; R.RADINOVIĆ:D3864,paras.64,121-138.

¹⁴⁷¹ R.THEUNENS:P3033,pp.512-530; R.THEUNENS:T.16854-16857. *See also* orders P854; P857; P1639; P1684; P2661; P2664; P3041; P3042; P3045; P3053; P4447; P4495; P4812; P5042; P5058.

¹⁴⁷² D325,p.8. *See also* R.THEUNENS:T.16847-16848; M.MILOVANOVIĆ:T.25493-25494; Lj.OBRADOVIĆ:P4444,p.67; Lj.OBRADOVIĆ:T.25129,25249-25250; R.BUTLER:T.27438-27440; M.LAZIĆ:P4072,pp.41-42.

¹⁴⁷³ P1415,p.84; P970,p.240.

KARADŽIĆ told the Assembly in 1995, he had examined and approved the first seven Directives.¹⁴⁷⁴ **MLADIĆ** similarly affirmed **KARADŽIĆ**'s role in the directives, noting to **KARADŽIĆ** at a 1995 session of the Supreme Command that "we gave you the greatest state secrets for verification; every directive went through here for examination, we did every analysis in your presence, we even invited you to be present at the lower counselling, and it's a shame that you were not with us more often".¹⁴⁷⁵ **KARADŽIĆ**'s hands-on commanding role over the VRS is affirmed by an examination of the directives and contemporaneous meetings with **KARADŽIĆ** and the BSL with **MLADIĆ** and other VRS-GŠ members.

i. Directive 1

406. On 1 June 1992, the VRS-GŠ issued an order to its Corps indicating that, pursuant to an RS Presidency and VRS-GŠ decision, a meeting of the RS political leadership and military commanders was to be held in Pale on 3 June 1992. Corps' Commanders were to prepare a map showing troop dispositions, the situation of the units, the composition, manpower, disposition and probable intentions of the enemy, proposals for future activities and any problems and requests. Each commander was to brief for 10-15 minutes.¹⁴⁷⁶

407. On 5 June 1992, **MLADIĆ** met with **KARADŽIĆ** and the BSL. **KARADŽIĆ** referred to "the issue of our objective in Sarajevo" and told **MLADIĆ** that "Sarajevo has to be resolved politically while acting quietly, inch by inch. -[očistiti—cleanse/mop-up] Butmir, Hrasnica, Dobrinja and Sokolović Kolonija, and in the town of Hrasno in the direction of Mojmiilo hill."¹⁴⁷⁷

408. The next day, **KARADŽIĆ** and **KRAJIŠNIK** again met with **MLADIĆ**. As noted above, **KARADŽIĆ** "reiterated the strategic objectives with comments and explanations",¹⁴⁷⁸ and stated that "the birth of a state and the creation of borders does not occur without war."¹⁴⁷⁹ **KRAJIŠNIK** then told **MLADIĆ**, "As of tomorrow we

¹⁴⁷⁴ P1415,p.84; confirmed also by **MLADIĆ**, see P970,p.240.

¹⁴⁷⁵ P3149,p.24.

¹⁴⁷⁶ P1508; P1004.

¹⁴⁷⁷ P1478,pp.92-93. See also P1477,pp.375-376, reflecting the frequency of meetings of the political and military leadership at that time.

¹⁴⁷⁸ P1478,p.94.

¹⁴⁷⁹ P1478,p.97.

have to conquer what is ours and be prepared to defend our state."¹⁴⁸⁰ Directive 1 was issued that same day.¹⁴⁸¹

409. In addition to incorporating operational goals arising from the strategic objectives—secure parts of Sarajevo (#5); open the "corridor" between the Bosnian Krajina and Semberija (#2); open the Sarajevo-Trnovo-Kalinovik communication line (#4 and #5)—the Directive incorporated virtually verbatim **KARADŽIĆ**'s instructions, calling on the SRK to "*očistiti*" (cleanse or mop up) Dobrinja, Butmir, Sokolović Kolonija, Mojmiilo, Zlatišta.¹⁴⁸²

ii. Directive 2

410. Directive 2,¹⁴⁸³ signed by MLADIĆ on 22 July 1992, referred to the cease-fire agreement that had been signed in London, and instructed the VRS on the implementation of this agreement.¹⁴⁸⁴ MLADIĆ also mentioned some VRS achievements to date, noting that it had "liberated the territories we consider ours and created conditions for political and military leadership of SR BiH, so that they could perform all activities and negotiations regarding the future state of BiH from the position of the stronger one in this territory." Additionally, "we have broken through corridors in Eastern Bosnia and Bosanska Posavina and thus made possible the centuries-long aspiration of the Serbian people from BiH and the Serbian Republic of Krajina to be joined with the fatherland—Serbia."¹⁴⁸⁵ MLADIĆ thus confirmed the importance of the factual situation on the ground to strengthen the BSL in negotiations¹⁴⁸⁶ and the BSL's ultimate goal to be united with the Serbs outside BiH.

iii. Directive 3

411. Directive 3 was issued on 3 August 1992.¹⁴⁸⁷ The previous day MLADIĆ had briefed the Presidency on the military situation, describing the situation in each

¹⁴⁸⁰ P1478,p.109.

¹⁴⁸¹ Directive for Further Actions:D232.

¹⁴⁸² D232,p.3.

¹⁴⁸³ Directive for Further Operations No.2(02/5-72):D593.

¹⁴⁸⁴ D593; R.THEUNENS:P3033,p.366.

¹⁴⁸⁵ D593,p.1.

¹⁴⁸⁶ *See also* Directive 3, discussed below.

¹⁴⁸⁷ Directive for Further Operations No.3(02/5-92):D1601.

combat sector and the necessary tasks.¹⁴⁸⁸ **KARADŽIĆ** demanded that the VRS "snatch" as much territory as possible before the next Peace Conference on BiH (London, 24 August), so that he would also have something to "offer" and not just demand.¹⁴⁸⁹ He told MLADIĆ that "the European Community will accept the factual state of affairs and that is why we should not make a single concession in military terms."¹⁴⁹⁰

412. Consistent with **KARADŽIĆ**'s instructions, Directive 3 provided that:

Before the conference on BH, reach the left bank of the Neretva river, the right bank of the Sava river, and the outlying areas of Serbian territories. Capture Jajce and Goražde, take over dominant features and secure the best position possible for the negotiations over demarcation lines with the Croatian-Muslim coalition. The operation shall be conducted in two phases lasting between 10 and 15 days.¹⁴⁹¹

413. On 4 August 1992, MLADIĆ once again met with the Presidency, at which meeting the "directive [was] accepted without objections".¹⁴⁹²

iv. Directive 4

414. Directive 4,¹⁴⁹³ dated 19 November 1992, noted in part that the Posavina Corridor had not been substantially widened, called for a corridor to Herzegovina to reach the left bank of the Neretva river and if possible to gain access to the sea.¹⁴⁹⁴ These provisions reflected strategic objectives 2, 4 and 6 respectively.

415. Directive 4 also ordered the Drina Corps "to exhaust the enemy, inflict the heaviest possible losses on them and force them to leave the Birač, Žepa and Goražde areas with the Muslim population."¹⁴⁹⁵ **KRAJIŠNIK** admitted in his own case that this was "absolutely" an "order for ethnic cleansing."¹⁴⁹⁶

¹⁴⁸⁸ P3068.

¹⁴⁸⁹ D2149,p.7.

¹⁴⁹⁰ P1479,p.22.

¹⁴⁹¹ D1601,p.3.

¹⁴⁹² P1479,p.24.

¹⁴⁹³ Directive for Further Operations No.4(02/5-210):P976.

¹⁴⁹⁴ P976; R.THEUNENS:P3033,pp.367-368.

¹⁴⁹⁵ P976,p.5.

¹⁴⁹⁶ M.KRAJIŠNIK:T.43823-43824.

416. This criminal order arose, as in the previous examples, from express direction provided by the BSL. As noted above, **KARADŽIĆ** held a meeting on 8 November at which corps commanders (including the commander of the recently formed DK Colonel ŽIVANOVIĆ) gave operational and situational reports.¹⁴⁹⁷ Following those reports, the meeting turned to "assignments for future actions."¹⁴⁹⁸ After **KARADŽIĆ** suggested that "maybe it would be good if we solved: the issue of the /River/ Drina",¹⁴⁹⁹ KRAJIŠNIK stated, as discussed earlier, that the VRS had not yet achieved three of the strategic objectives, including the Podrinje, *i.e.*, strategic objective 3 and therefore, "the most important objective is the task assigned to ŽIVANOVIĆ—the [čišćenje—cleansing/mopping up] of the Drina."¹⁵⁰⁰

417. Two days later, MILOVANOVIĆ told **KARADŽIĆ** that he would soon receive VRS-GŠ Directive 4 which, among other things, regulated "the activities of the newly-formed Drina Corps."¹⁵⁰¹ In the following days, **KARADŽIĆ** offered suggestions and verbally approved the Directive.¹⁵⁰²

418. **KARADŽIĆ** also called for a seminar with the DK to be held on 23 November 1992 at the Corps Command a few days after the issuance of the Directive,¹⁵⁰³ to be led personally by him.¹⁵⁰⁴ At the seminar,¹⁵⁰⁵ **KARADŽIĆ** gave the opening speech, followed by Corps commander ŽIVANOVIĆ, who was to speak on the "situation, results, further tasks and capabilities" of the DK.¹⁵⁰⁶ **KARADŽIĆ**'s notes on ŽIVANOVIĆ's report read: "tasks: 1.Vitnica, Sapna, Teočak; 2.Cerska; 3.Žepa; 4.Srebrenica; 5.Goražde".¹⁵⁰⁷

419. The following day, ŽIVANOVIĆ issued his DK command order "pursuant to" Directive 4 and "an assessment of the situation." Coming on the heels of **KARADŽIĆ**'s consultations, it re-affirmed the order he had approved to force out the Muslim civilian population, and the VRS's commitment to implementing the strategy.

¹⁴⁹⁷ P1481,p.141.

¹⁴⁹⁸ P1481,p.145.

¹⁴⁹⁹ P1481,p.146.

¹⁵⁰⁰ P1481,p.147.

¹⁵⁰¹ D2149,p.13.

¹⁵⁰² D2149,p.13.

¹⁵⁰³ P3037.

¹⁵⁰⁴ P4921.

¹⁵⁰⁵ P4922.

¹⁵⁰⁶ P4248.

¹⁵⁰⁷ P2716,p.40.

ŽIVANOVIĆ's order provided that the Corps was to "inflict on the enemy the highest possible losses, exhaust them, break them up or force them to surrender, and force the Muslim local population to abandon the area of Cerska, Žepa, Srebrenica and Goražde."¹⁵⁰⁸

v. Directive 5

420. Directive 5 was dated 25 June 1993,¹⁵⁰⁹ detailing an operation code-named *Lukavac-93*. A month earlier, MILOVANOVIĆ had been called to Pale at "the supreme commander's request,"¹⁵¹⁰ where he explained to KARADŽIĆ and KRAJIŠNIK the VRS-GŠ plan to conduct Operation *Lukavac-93*, which was meant to enable the VRS to connect Serbian Herzegovina with other RS territories. Planning for the operation was completed in June.¹⁵¹¹

vi. Directive 6

421. On 24 October 1993, at a Supreme Command session, KARADŽIĆ generally agreed to proposals for future activities, noting only that Teočak should be finished—"Do it like Trnovo"—and that "Sarajevo is the most important territory."¹⁵¹² Directive 6¹⁵¹³ was issued on 11 November 1993 and signed by KARADŽIĆ. In light of his direction concerning Sarajevo and Teočak on 24 October, the Directive provided that the main forces of the VRS "during offensive operations" were to "create objective conditions for the achievement of strategic war goals of the Army of Republika Srpska, including the liberation of Sarajevo"¹⁵¹⁴ and also ordered the IBK to "liberate Teočak."¹⁵¹⁵ The Directive reflected further efforts to implement the strategic objectives, including defining the borders of RS on the Neretva river and gaining access to the sea in the Neum–Zaton and the Cavtat–Prevlaka sectors (strategic objectives 4 and 6); defining the RS borders in the Una river basin (strategic objective

¹⁵⁰⁸ P2085(emphasis added). See further M.ŽIVANOVIĆ:T.42595-42596; R.BUTLER:P4914,para.1.24.

¹⁵⁰⁹ Directive for Further Operations No.5(02/2-479):P843.

¹⁵¹⁰ D2149,p.24.

¹⁵¹¹ D2149,p.24.

¹⁵¹² P1483,p.396.

¹⁵¹³ Directive for Further Operations No.6(02/2-934):P3039.

¹⁵¹⁴ P3039,p.6.

¹⁵¹⁵ P3039,p.9.

4); and expanding the borders of RS in its north-eastern part and establishing firm ties with Serbia (strategic objectives 2 and 3).¹⁵¹⁶

422. On 13 and 14 December 1993, **KARADŽIĆ**, **KRAJIŠNIK**, **MLADIĆ** and **MILOVANOVIĆ** met with **MILOŠEVIĆ**, **PERIŠIĆ**, and Jovica **STANIŠIĆ** to discuss improving the Bosnian Serbs' operational and tactical position.¹⁵¹⁷ **KARADŽIĆ** explained that the Bosnian Serbs were holding 75% and the most important parts of the territory and it was a favourable time to end the war—"unification with Serbia is smiling upon us".

423. Putting the operational and tactical issues in context, **KARADŽIĆ** outlined the strategic objectives.¹⁵¹⁸ He pointed out that "Sarajevo is the priority and the key to the war" and asserted that "Žuč is especially important" and "Mojmilo is also an important point for Sarajevo." **KRAJIŠNIK** noted that "[w]e have to finish Žuč before the Conference," referring to the upcoming resumption of negotiations in Geneva.¹⁵¹⁹ **MILOŠEVIĆ** then promised everything for a Sarajevo operation that did not jeopardize Serbian combat readiness, including a great deal of fuel.¹⁵²⁰

424. Within two days, **KARADŽIĆ** issued an addition to Directive 6, which incorporated the precise priority targets he had identified in the meetings with **MILOŠEVIĆ** to secure support. The Combat Order directed the VRS to "seize the Žuč and Mojmiilo features to ensure the most favourable position for dividing the town of Sarajevo and protecting the special-purpose industry facilities."¹⁵²¹ It also reflected the concerns expressed by **KRAJIŠNIK** in the earlier meetings about the imminent negotiations, noting that the Geneva negotiations would resume on 21 December and directing the VRS to "carry out offensive tasks by 21 December 1993."¹⁵²²

425. **KARADŽIĆ**'s addition to Directive 6 also directed the VRS to improve the operational and tactical position in Goražde and "to gain control over the right bank of

¹⁵¹⁶ See also R.THEUNENS:P3033,pp.369-370.

¹⁵¹⁷ P1484,pp.53-61.

¹⁵¹⁸ P1484,p.53.

¹⁵¹⁹ P1484,p.59.

¹⁵²⁰ P1484,pp.56-58.

¹⁵²¹ P4925,p.1.

¹⁵²² P4925,p.2.

the Drina River."¹⁵²³ That was not achieved and on 27 March 1994, **KARADŽIĆ** "gave an oral approval for the HK /Herzegovina Corps/ units to perform the operation "Zvijezda-94 /Star-94/ in the surroundings of Goražde, scheduled to begin on March 29."¹⁵²⁴ This attack provoked strong condemnation from the international community, including the use of NATO close air support.¹⁵²⁵ Anticipating that a cease-fire could not be avoided, **KARADŽIĆ** ordered that "maximum use be made of this intervening period and that as much as possible be done in the sector of Goražde in the given conditions."¹⁵²⁶ On 17 April, **KARADŽIĆ** ordered the cessation of artillery fire "into the city of Goražde" and a 3km radius on the left bank, with the exception of the "Pobeda" Factory which he ordered "liberated," along with all features "and in particular the urban part of the city" within the 3km radius of the right bank.¹⁵²⁷ Meanwhile, **KARADŽIĆ** lied to members of the international community and even the FRY leadership in an effort to protract the bombardment of Goražde.¹⁵²⁸

vii. Directive 7

426. **KARADŽIĆ** signed Directive 7,¹⁵²⁹ dated 8 March 1995, another facially criminal order, and even bragged about it ("My Order No.7"¹⁵³⁰).

427. MLADIĆ designated General MILETIĆ to draft Directive 7.¹⁵³¹ According to procedure, MLADIĆ would have reviewed the directive before it was sent to **KARADŽIĆ**.¹⁵³² Once **KARADŽIĆ** signed, no alterations could be made.¹⁵³³ On 8 March 1995, MLADIĆ, DK Commander ŽIVANOVIĆ and other VRS generals met

¹⁵²³ P4925,p.1.

¹⁵²⁴ D2149,p.40.

¹⁵²⁵ P1659; P1661.

¹⁵²⁶ P1684.

¹⁵²⁷ R.THEUNENS:P3033,p.519. *See also* D706,pp.3-4. For further evidence of **KARADŽIĆ**'s command and control in respect of VRS operations around Goražde, *see* P1646,p.4; P829,pp.1-5; D4624; D4611; D4819. The context to both D4611 and D4819 is P829 (16 April 1994), D3497 (17 April 1994), P852 (17 April 1994), and P853 (18 April 1994). These documents show that among other things, the BSL detained UN peacekeepers and violated cease-fires, and were now making limited concessions only in the face of concerted international pressure to refrain from continued attacks on Goražde and release peacekeepers. Therefore D4611 does not reflect any humanitarian policy. *See also* P1412,pp.72-74.

¹⁵²⁸ M.BULATOVIĆ:T.34536-34539; P6160,pp.5-6; D162,p.133; Y.AKASHI:T.37757-37759; D3489,p.43; P1390,p.47.

¹⁵²⁹ Directive for Further Operations No.7(03/4-434):P838.

¹⁵³⁰ P4515,p.12; R.ĐURĐEVIĆ:T.25907,25938-25939.

¹⁵³¹ M.MILOVANOVIĆ:T.25495. *See also* P.SALAPURA:T.40241-40242;

Lj.OBRADOVIĆ:P4444,pp.68-69,75.

¹⁵³² Lj.OBRADOVIĆ:P4444,pp.68,83.

and discussed Directive 7.¹⁵³⁴ ŽIVANOVIĆ noted MLADIĆ's remark: "Make life impossible"¹⁵³⁵—the same phrase found in Directive 7.¹⁵³⁶

428. **KARADŽIĆ**'s arguments that he did not sign the Directive, or—if he did, he was not aware of what he was signing¹⁵³⁷—is belied by his signature on Directive 7,¹⁵³⁸ and his claims of responsibility for signing it on several occasions. For example, at the 52nd Assembly, **KARADŽIĆ** stated: "the time had come, I put my mark on Directive No. 7".¹⁵³⁹

c. Other examples of **KARADŽIĆ**'s exercise of his command authority

429. As noted above, **KARADŽIĆ** claimed to the Assembly in 1993 that his involvement in tactical matters occurred when he considered that things were going wrong.¹⁵⁴⁰ As seen above and as reflected in numerous non-strategic orders,¹⁵⁴¹ this characterisation understated his interventions as commander.

d. Situational awareness

430. **KARADŽIĆ**'s decisions reflect his ongoing awareness of operations. Throughout the relevant period, **KARADŽIĆ** received information on events in the field through the NSC,¹⁵⁴² Presidency,¹⁵⁴³ and Assembly;¹⁵⁴⁴ Supreme Command meetings;¹⁵⁴⁵ consultative meetings of civilian and military leaders;¹⁵⁴⁶ visits to the

¹⁵³³ M.MILOVANOVIC:T.25499.

¹⁵³⁴ M.ŽIVANOVIĆ:T.42650-42653. *See also* P1473,pp.52-53.

¹⁵³⁵ P6483,p.4.

¹⁵³⁶ P838,p.10.

¹⁵³⁷ *See e.g.* G.MILINIC:D3682,paras.21-22; G.MILINIC:T.39754-39755,39758,39761,39765.

¹⁵³⁸ P838. *See also* M.MIHAILOVIC:T.24337,25497; M.TRIVIC:T.40536.

¹⁵³⁹ P1412,p.75. *See also* P1415,p.84; R.ĐURĐEVIĆ:T.25906-25908,25910-25911,25938-25939,25959.

¹⁵⁴⁰ P1379,p.255.

¹⁵⁴¹ *See e.g.* R.THEUNENS:P3033,pp.509-541; R.THEUNENS:T.16859-16860,16891-16893; P2276; P3053; P2645; P5083; P846; P2661; P5058; P3053; D43; P1684; P4447; P4495; P2664; P5042; D4812; P3042,p.6; P5190; P2459,p.2; P1503; P1299; D2149,pp.5,7,10,12,13,15,16,18,22,26,27,28,35,36,37,39,40,44,45,48,49,50,55,56,57.

¹⁵⁴² *See e.g.* P3051; P3050; R.THEUNENS:T.16886-16889.

¹⁵⁴³ *See e.g.* P3061; D428; P1093; P3063; P3064; P1504; P1465; P1467; P3072; P3073; D456,p.19; P1004.

¹⁵⁴⁴ *See e.g.* P1379,p.355; P970,pp.218,219,352.

¹⁵⁴⁵ *See e.g.* P1469; P970,pp.342-343.

field and units;¹⁵⁴⁷ reporting and briefings on VRS combat readiness;¹⁵⁴⁸ combat reports;¹⁵⁴⁹ VRS Intelligence reports;¹⁵⁵⁰ MUP reports,¹⁵⁵¹ and telephone conversations.¹⁵⁵² The elaborate communications systems at **KARADŽIĆ**'s disposal are discussed below.¹⁵⁵³

431. Reports from the Corps level to the VRS-GŠ were made orally and in written regular combat reports and special reports.¹⁵⁵⁴ These written reports contained sections relating to enemy forces, the state of combat readiness of the units of the Corps, the situation on the ground, unusual incidents, security and morale issues, logistics support, casualties, and conclusions and anticipated developments.¹⁵⁵⁵ According to the 1993 Combat Readiness Report, the system of communication in the VRS was graded "VERY GOOD,"¹⁵⁵⁶ a conclusion echoed by international observers.¹⁵⁵⁷

432. The regular information flow to **KARADŽIĆ** functioned throughout the relevant period.¹⁵⁵⁸ As noted in the Combat Readiness Report, **KARADŽIĆ** was informed, often in great detail, about operations not only before they began but once they were underway,¹⁵⁵⁹ thus ensuring he had the information necessary to determine whether he was satisfied with the results or wished to intervene.

e. **KARADŽIĆ** retained control over MLADIĆ throughout the Indictment period

¹⁵⁴⁶ See e.g. N.PRSTOJEVIĆ:T.13264,13267-13268; P1006; P1508; P3037. See also R.THEUNENS:T.16842-16843; P5053; [REDACTED]

[REDACTED]. See also R.THEUNENS:P3033,pp.552-554; J.WILSON:P1029,paras.130,132-133.

¹⁵⁴⁷ See e.g. P1466; P5522; P2845.

¹⁵⁴⁸ See e.g. D325,pp.153,155; P2685. See also P970,p.21; D456,p.14; P2459; P3042.

¹⁵⁴⁹ P1478,p.126; R.THEUNENS:P3033,pp.546-550; R.THEUNENS:T.16855-16856,16848-16849; P3039,p.15. See e.g. P2276; P3054; P3042; P4464; P3043; P4457; P1662; P3043; P1786; P1663.

¹⁵⁵⁰ R.THEUNENS:P3033,p.550; D4780,pp.1,7; D4785,pp.1,6; P5086.

¹⁵⁵¹ See examples in R.THEUNENS:P3033,p.551. See also P857; P4906; P5190; P5451.

¹⁵⁵² P4786; P4803; P4806.

¹⁵⁵³ See III.C.9: **KARADŽIĆ** had a comprehensive communications network.

¹⁵⁵⁴ E.BROWN:P3914,p.171; R.THEUNENS:P3033,pp.546-549. See e.g. P3054; P3042; P3043; P3664,p.3; P3658,p.1; P5459,p.2; P3931.p.1.

¹⁵⁵⁵ E.BROWN:P3914,p.171.

¹⁵⁵⁶ D325,p.41.

¹⁵⁵⁷ See e.g. J.WILSON:P1029,para.130; M.ROSE:P1638,para.100; A.VANBAAL:P1818,paras.23-24,63-66.

433. In the course of its effort to distance **KARADŽIĆ** from what he had once claimed as his army and from the men he once claimed as his assistants, the Defence suggested a schism between **KARADŽIĆ** and MLADIĆ.¹⁵⁶⁰

434. Although tensions emerged in the relationship between **KARADŽIĆ** and MLADIĆ, no disagreement over the common purpose or the commission of crimes in furtherance of that purpose existed between them. Instead, tensions stemmed from such matters as MLADIĆ's complaints that **KARADŽIĆ** was undercutting the chain-of-command, a military principle MLADIĆ considered to be of key importance for any army.¹⁵⁶¹ Even Defence expert RADINOVIĆ confirmed that their disagreements were not about war goals and strategy but rather different views as to how to execute a particular task,¹⁵⁶² while SUBOTIĆ—who started as Minister of Defence in April 1992 and remained at **KARADŽIĆ**'s side as military advisor throughout the war—could not identify a single military action or operation in which MLADIĆ went beyond what the political leadership wanted him to do.¹⁵⁶³

435. Throughout most of the Indictment period, the public face of the relationship between the two men was generally one of sufficient accord within the context of a superior-subordinate relationship. At a 4 August 1994 briefing of the VRS Corps, for example, MLADIĆ records **KARADŽIĆ** as saying: "Everyone is looking to find a rift among individuals in the leadership, especially between me and MLADIĆ. They will fail at that, because MLADIĆ and I talk about things as brothers. We tell each other face to face what we think and our aim is to move together towards the same goal."¹⁵⁶⁴

436. Even implied acknowledgements of disagreements were treated as conventional and constructive. As **KARADŽIĆ** stated when he praised the VRS in January 1995:

¹⁵⁵⁸ See III.C.9: **KARADŽIĆ** had a comprehensive communications network.

¹⁵⁵⁹ D325,p.153.

¹⁵⁶⁰ See e.g. R.RADINOVIĆ:D3864,para.102; R.RADINOVIĆ:T.41502-41503,41604-41607,41613,41615-41619; B.SUBOTIĆ:D3695,paras.124-140,144,148,160,166,169,174-175.

¹⁵⁶¹ P3149,pp.9,32,57.

¹⁵⁶² R.RADINOVIĆ:T.41382-41383,41448-41451,41502-41503,41602-41608,41610.

¹⁵⁶³ B.SUBOTIĆ:T.40047-40049. See also D.MILOŠEVIĆ:T.33089.

¹⁵⁶⁴ P1486,p.269.

I am saying that all speculations about the army not obeying the civilian authority are out of place. As the supreme commander, I get all the respect from the officers and soldiers, and I wouldn't even want our officers to be obedient or soft [...] I want them to "argue" with me about various solutions because it helps me to make the right decision, but when I make a decision, they carry it out brilliantly.¹⁵⁶⁵

437. MLADIĆ remained deferential to his commander-in-chief, even where disagreements arose between them. For example, at the 14th Supreme Command session on 31 March 1995, MLADIĆ—while affirming **KARADŽIĆ**'s right as Supreme Commander to give orders¹⁵⁶⁶—complained that **KARADŽIĆ** and the civilian government were "stripping down" the authority of the VRS-GŠ by, for example, rescinding MLADIĆ's authority to make unilateral promotions of lower-ranking soldiers, by communicating directly to MLADIĆ's subordinates in breach of the standard chain of command and by not giving the military sufficient power over the military justice system.¹⁵⁶⁷

438. The sometimes-heated discussion that follows, however, shows that the two men worked together, as superior and subordinate and within the chain of command, to achieve their common goals. **KARADŽIĆ** reminds MLADIĆ that each of his proposals for promotions had been approved,¹⁵⁶⁸ that the VRS-GŠ was given the opportunity to comment on the law governing promotions before it was enacted,¹⁵⁶⁹ and that he was invited to the meetings in question.¹⁵⁷⁰ Ultimately, MLADIĆ does not dispute **KARADŽIĆ**'s statement that "[e]very army, every structure; and every honour to it if it succeeds; I am responsible. The army is mine as much as the minister's. As much as the Prime Minister is mine, so the army is mine [...]."¹⁵⁷¹ MLADIĆ even makes reference to the false rumours spread by others "that there was some sort of an argument between me and [**KARADŽIĆ**], some animosity between me and [**KARADŽIĆ**]"¹⁵⁷²

¹⁵⁶⁵ P953,p.9. *See also* P970,p.322.

¹⁵⁶⁶ P3149,p.32.

¹⁵⁶⁷ P3149,pp.8-14. *See also* R.THEUNENS:P3033,p.562.

¹⁵⁶⁸ P3149,p.13.

¹⁵⁶⁹ P3149,p.15.

¹⁵⁷⁰ P3149,p.20.

¹⁵⁷¹ P3149,p.21.

¹⁵⁷² P3149,p.57.

439. As a subordinate addressing a superior, MLADIĆ reports about military matters.¹⁵⁷³ At the end of the meeting, MLADIĆ seeks from **KARADŽIĆ** and is granted leave to make a clandestine visit to Russia and to meet with President Boris YELTSIN.¹⁵⁷⁴

440. Even when tensions between the two men led to **KARADŽIĆ** briefly removing MLADIĆ as VRS-GŠ commander in August 1995,¹⁵⁷⁵ in what amounted to a public rebuke of MLADIĆ's failure to properly defend the Croatian Krajina,¹⁵⁷⁶ MLADIĆ still refused to make a public statement that would contradict his Commander-in-Chief.¹⁵⁷⁷ At a FRY SDC meeting on 23 August 1995, the FRY leadership (including MILOŠEVIĆ) repeatedly pressured MLADIĆ to express his views on possible peace settlements and to publicly express his support for peace, in contradiction to **KARADŽIĆ**'s public statements. MLADIĆ refused, saying he was "only a soldier of the people" and "not an elected representative".¹⁵⁷⁸

441. As **KARADŽIĆ** affirmed on 16 August 1995, after he had rescinded his decision to remove MLADIĆ as commander of the VRS-GŠ:

There is no conflict, the competence is very clear. I am the President of the Republic and the only Commander of the Army, the Commander-in-chief. General Mladić is the second man in that hierarchy, the operative commander of the Army, that is, the Chief Headquarters Commander. There is mutual criticizing, I cannot say misunderstanding.¹⁵⁷⁹

442. None of these incidents of tension between MLADIĆ and **KARADŽIĆ** show any divergence between them on the question of the common purpose or the criminal means with which the VRS pursued them. **KARADŽIĆ** never rebuked MLADIĆ for VRS attacks on non-Serb civilians, abuses in VRS-run detention camps or the murders of thousands of men and boys following the fall of Srebrenica. In fact, even as **KARADŽIĆ** was explaining his demotion of MLADIĆ for the military's failure to

¹⁵⁷³ P3149,p.86.

¹⁵⁷⁴ P3149,p.93.

¹⁵⁷⁵ See R.THEUNENS:P3033,pp.569-578. See also P1412,p.22.

¹⁵⁷⁶ See P2565. See also B.SUBOTIĆ:T.40067; P6407. See also P1412,p.14.

¹⁵⁷⁷ P2627.

¹⁵⁷⁸ P2567,pp.5,6.

¹⁵⁷⁹ P6407,p.3; B.SUBOTIĆ:T.40068.

defend the Krajina, he was praising MLADIĆ and other military commanders for the "excellent job" they did in Srebrenica.¹⁵⁸⁰

443. Whatever the personal differences between MLADIĆ and **KARADŽIĆ**—or between any members of the JCE—the BSL and the VRS worked closely together to translate the common criminal purpose into political goals carried out by military means.

(j) JNA/VJ

444. Completing a process that had begun in Croatia, the JNA, in cooperation with the authorities in Serbia/Yugoslavia and the BSL, transformed from an army protecting all peoples in the former Yugoslavia into an army protecting the interests of the Serbian people.¹⁵⁸¹

445. On 10 December 1991, the Yugoslav Federal Secretariat for National Defence ("SSNO")—still ostensibly charged with the protection of all of Yugoslavia's citizens—issued a Directive on the use of the armed forces including as one of the "ultimate aims of the war: protection of the Serbian population".¹⁵⁸² A day later, KRAJIŠNIK requested several Assembly delegates to draft a request to the JNA to protect the territorial integrity of Yugoslavia, including the territories targeted by the BSL.¹⁵⁸³

446. From the beginning of the fighting in Croatia **KARADŽIĆ** maintained contact with the leadership in Belgrade and spearheaded the mobilisation of recruits and volunteers.¹⁵⁸⁴ As Bosnian independence became increasingly likely, **KARADŽIĆ** and MILOŠEVIĆ discussed military action in BiH.¹⁵⁸⁵

447. Thus, when the JNA was required to withdraw from Croatia,¹⁵⁸⁶ the SFRY Supreme Command established the JNA 2nd Military District ("MD") covering most

¹⁵⁸⁰ P2565. *See also* P1412, pp.14,17.

¹⁵⁸¹ R.THEUNENS:P3033, pp.155-173.

¹⁵⁸² P2601, p.3. *See also* R.THEUNENS:P3033, pp.170-172; A.VASILJEVIĆ:T.34673-34675.

¹⁵⁸³ D84, pp.4-10.

¹⁵⁸⁴ *See e.g.* P5889; P5883. *See also* A.VASILJEVIĆ:D3065, paras.139,206; A.VASILJEVIĆ:T.34707-34708.

¹⁵⁸⁵ P5790, p.3.

¹⁵⁸⁶ P753, pp.6-7; R.THEUNENS:P3033, pp.241,244.

of BiH territory, effective 10 January 1992.¹⁵⁸⁷ JNA units were redeployed to areas in BiH with a Bosnian Serb majority or areas of military or strategic importance,¹⁵⁸⁸ and weapons and equipment were transferred from "hostile" environments in BiH to Serb-inhabited areas.¹⁵⁸⁹

448. The SDS leadership embraced the JNA as sharing its interests and by March 1992 were fully prepared to wage war should their political option not be accepted.¹⁵⁹⁰ By this time, the JNA consisted mostly of officers and soldiers of Serb ethnicity.¹⁵⁹¹ As discussed above, the JNA collaborated with the SDS in arming the Bosnian Serb people;¹⁵⁹² by March 1992 they had together armed 69,000 Bosnian Serbs outside the JNA or TO structures.¹⁵⁹³ As noted in the 1993 Combat Readiness Report, the SDS, in conjunction with the JNA, armed local Serbs, and local armed Serb units were created on a "massive scale".¹⁵⁹⁴

449. A close relationship of coordination, cooperation and support existed between **KARADŽIĆ** and the BSL, the Serb TO, and elements of the JNA before the JNA's withdrawal and the establishment of the VRS in mid-May 1992.¹⁵⁹⁵ Municipal CSs coordinated closely with JNA commanders, some of whom became CS members.¹⁵⁹⁶ JNA units participated in attacks on towns, villages and non-Serb settlements together with TO and paramilitaries and volunteers.¹⁵⁹⁷ As **KARADŽIĆ** stated in 1995:

The war began, and the JNA helped as much as it could [...] Together with the police, those were the armed forces of the Serbian Republic of Bosnia and Herzegovina, they created the space,

¹⁵⁸⁷ See further R.THEUNENS:P3033,pp.234-237,243-244; P753; P979.

¹⁵⁸⁸ A.VASILJEVIĆ:D3065,paras.210-211; A.VASILJEVIĆ:T.34697-34699; D3065,para.133; P6170,pp.3-6; P979; P148.

¹⁵⁸⁹ A.VASILJEVIĆ:D3065,paras.213-214; P979,pp.7-8.

¹⁵⁹⁰ P979,pp.4-5.

¹⁵⁹¹ P6170,pp.3-6,8-9,13-14; A.VASILJEVIĆ:D3065,paras.138-139,209; A.VASILJEVIĆ:T.34673-34675,34692; P2601; R.THEUNENS:P3033,pp.170-171,173,241; P3035; R.RADINOVIĆ:D3864,para.76.

¹⁵⁹² See III.C.8.(a).(iii): The SDS implemented the common criminal purpose.

¹⁵⁹³ P979,p.6. See also P6170,p.8; R.THEUNENS:T.16865-16869,17008-17010.

¹⁵⁹⁴ D325,pp.13-15,158-159. See also P979,p.6; P978; P970,pp.316-317; P1379,p.354; D1610; P6170,pp.8,13,22; A.VASILJEVIĆ:D3065,paras.207,209; A.VASILJEVIĆ:T.34673-34675,34683,34711; R.THEUNENS:P3033,pp.251-259.

¹⁵⁹⁵ E.BROWN:P3914,pp.68-81; R.THEUNENS:P3033,pp.251-259; P979.

¹⁵⁹⁶ See e.g. **ARK**:P3924; **Sanski Most**:P2614; **Prijedor**:P2630,p.1; **Zvornik**:P2590.

¹⁵⁹⁷ R.THEUNENS:P3033,pp.372-430,439-451. See e.g. Bratunac, Brčko, Zvornik Summaries.

liberated and created the space. In some places with the help of the JNA, in others without the help of the JNA [...]¹⁵⁹⁸

450. When the JNA withdrew from BiH in May 1992, hundreds of JNA officers, including General MLADIĆ, remained in BiH or were deployed to BiH and became VRS members, at the same time retaining their status as JNA (or, as it was later renamed, VJ) members and continuing to receive their JNA/VJ salary and payments.¹⁵⁹⁹ The VJ continued to provide the VRS with logistical and financial support and training,¹⁶⁰⁰ and at times participated covertly¹⁶⁰¹ in military activities in BiH after May 1992.¹⁶⁰²

(k) TO

451. Notwithstanding the JNA's support, the BSL developed their own military structures, which were formed from Serb elements in the existing multi-ethnic BiH TO, in particular in the areas with a significant Serb population.¹⁶⁰³

452. The SDS played the central role in establishing the Serb TO units.¹⁶⁰⁴ TO's were "formed on the initiative and under the leadership of the [SDS] as a self-organisational form of the Serbian people".¹⁶⁰⁵ As **KARADŽIĆ** later stated: "We made various calculations and agreements with Yugoslavia, we decided to set up the TO, the Serbian brigades, which were indeed led by the SDS, but not as a Party army, but as [a] people's army".¹⁶⁰⁶

¹⁵⁹⁸ P970,p.316.

¹⁵⁹⁹ R.THEUNENS:P3033,pp.245-251,355-357,480-492; R.THEUNENS:T.16870-16873,16876; P5477; P3048,pp.7-8,13-14; P3049,pp.32-38.

¹⁶⁰⁰ R.THEUNENS:P3033,pp.355,480-481,488-492; R.THEUNENS:T.16870-16873,16876; P3048,pp.5-7,8-12; P3049,pp.37-38,40.

¹⁶⁰¹ R.THEUNENS:P3033,pp.473-491.

¹⁶⁰² R.THEUNENS:P3033,pp.493-494; P3052.

¹⁶⁰³ R.THEUNENS:P3033,pp.260-279.

¹⁶⁰⁴ D325,pp.69,75; R.THEUNENS:P3033,pp.260-261. *See also* D.ANDAN:D3774,pp.323-327,385-389; D.ANDAN:T.40871-40872.

¹⁶⁰⁵ D325,p.69.

¹⁶⁰⁶ P970,pp.316-317.

453. These units participated together with the JNA, MUP and other Serb Forces in the military takeovers of Serb-targeted municipalities and related crimes, including the killings, detentions and expulsion of non-Serb civilians.¹⁶⁰⁷

454. As Foča SDS main board member Miroslav STANIĆ stated about June 1991: "The SDS promptly formed eight battalions, which were led [...] by the then reserve Serbian officers."¹⁶⁰⁸ He explained that "I was the commander, on behalf of the SDS", and detailed how "we liberated" Foča town and municipality in April 1992.¹⁶⁰⁹

455. Similarly, SDS Main Board member Rajko KUŠIĆ formed and led a unit, referred to either as TO or paramilitary,¹⁶¹⁰ in Rogatica, which was subsequently incorporated into the VRS.¹⁶¹¹ This unit participated in the violent removal of Rogatica's non-Serb population and killed and detained non-Serb civilians.¹⁶¹²

456. Ljubiša SAVIĆ, a.k.a. MAUZER, a prominent Bijeljina SDS member formed and led a unit that called itself the Serbian National Guard or the Black Panthers, that was at times called a paramilitary unit but functioned and was at times perceived as a TO unit.¹⁶¹³ The unit members were trained at ARKAN's camp on the border between Bijeljina and Serbia.¹⁶¹⁴ MAUZER's unit was involved in attacks¹⁶¹⁵ and related crimes¹⁶¹⁶ in Bijeljina, Brčko and Zvornik, fighting alongside ARKAN's unit.¹⁶¹⁷ Subsequently, MAUZER's unit was incorporated into the VRS.¹⁶¹⁸ Despite an arrest in July 1992,¹⁶¹⁹ MAUZER was never tried and convicted for his crimes,¹⁶²⁰ but

¹⁶⁰⁷ See e.g. Bijeljina, Zvornik, Brčko, Foča, Rogatica, Ilidža Summaries. See also E.BROWN:P3914,pp.68-75; R.THEUNENS:P3033,pp.260-279,316-317; D325,pp.7,10,69,75; D296,pp.18-19.

¹⁶⁰⁸ P6081.

¹⁶⁰⁹ P3476,pp.2-3.

¹⁶¹⁰ AF2494; [REDACTED]; P2830,p.2; A.DŽAMBAŠOVIĆ:P2828,paras.65-68,71,119,121; [REDACTED]; [REDACTED]; T.BATINIĆ:T.33676-33677; D568,pp.1-2; P1505,p.2; M.LELEK:T.34374.

¹⁶¹¹ P1505,p.2; P2834; P2830,pp.4,15; M.LELEK:D3031,para.15; D308,p.2; D568,pp.1-2.

¹⁶¹² See Rogatica Summary.

¹⁶¹³ AF2237; M.DAVIDOVIĆ:P2848,paras.96,118,120; P2875; D1458; P2883; KDZ446:P29,p.55; C.SIMIĆ:T.35698-35699; P2855,p.5; D1585; R.THEUNENS:P3033,pp.270-271.

¹⁶¹⁴ M.DAVIDOVIĆ:P2848,paras.89,93,117; KDZ446:P29,pp.53-55.

¹⁶¹⁵ P5474; M.DAVIDOVIĆ:P2848,paras.118,120; KDZ446:P29,p.55; C.SIMIĆ:T.35698-35699; R.THEUNENS:P3033,pp.375-385. See Bijeljina, Zvornik, Brčko Summaries.

¹⁶¹⁶ M.DAVIDOVIĆ:P2848,para.95; P2896; P2855; D1412,pp.6-7. See Bijeljina, Zvornik, Brčko Summaries.

¹⁶¹⁷ D1612,pp.11-12; Ž.FILIPOVIĆ:T.35815-35816.

¹⁶¹⁸ P2855,p.5; D1458; P1480,p.40; P2716,p.7; P6133; M.DEURIĆ:T.33937-33938; D2137,p.1; R.THEUNENS:P3033,pp.270-271; D825,p.26.

¹⁶¹⁹ M.DAVIDOVIĆ:P2848,para.95; P2896.

¹⁶²⁰ C.SIMIĆ:T.35699-35700.

rather continued to enjoy support from the local¹⁶²¹ and RS leadership,¹⁶²² including **KARADŽIĆ**,¹⁶²³ and continued to commit crimes against non-Serbs in Bijeljina throughout the conflict.¹⁶²⁴ **KARADŽIĆ** was also present when MAUZER's unit paraded in Bijeljina in 1995.¹⁶²⁵

457. Throughout, **KARADŽIĆ** was at the apex of the TO structure and had command authority over the TO. Under RS legislation, the RS President supervised the TO in peace and wartime, and issued orders on combat readiness and deployment during a state of imminent threat of war and other emergency situations.¹⁶²⁶ The TO could also be reinforced with volunteers¹⁶²⁷ and indeed volunteers and paramilitaries were enlisted in the TO.¹⁶²⁸

458. As noted earlier,¹⁶²⁹ the NSC functioned from the outset as a *de facto* Presidency dominated by **KARADŽIĆ**. In addition to his other powers and duties as NSC President,¹⁶³⁰ he was charged with coordinating the TO command¹⁶³¹ and creating a city TO staff.¹⁶³² Under **KARADŽIĆ**'s chairmanship, the NSC decided on important issues for the functioning of the Serb TO such as civilian authority over the TO and the appointment of a TO Commander;¹⁶³³ declaration of a "State of Imminent Threat of War";¹⁶³⁴ provision of uniforms and insignia to the TO;¹⁶³⁵ appointment of TO Staff members;¹⁶³⁶ securing of salaries for TO members;¹⁶³⁷ requesting uniforms from the SSNO;¹⁶³⁸ preparation of defence legislation;¹⁶³⁹ transfer of JNA personnel

¹⁶²¹ P2855,p.5; M.DAVIDOVIĆ:P2848,paras.78,84.

¹⁶²² M.DAVIDOVIĆ:P2848,para.84; D.ANDAN:T.40882-40885; P6434,pp.3-4.

¹⁶²³ P2856; M.DAVIDOVIĆ:T.15481-15482; P5525,pp.17-18.

¹⁶²⁴ P1473,pp.87-88; M.DAVIDOVIĆ:P2848,paras.70,89; M.DAVIDOVIĆ:T.15582-15583; [REDACTED]; P2889. *See* Bijeljina Summary.

¹⁶²⁵ P2856; M.DAVIDOVIĆ:T.15480-15483.

¹⁶²⁶ R.THEUNENS:P3033,pp.272-273.

¹⁶²⁷ R.THEUNENS:P3033,p.274.

¹⁶²⁸ *See* III.C.8.(l): Paramilitaries/Volunteers/Serbian MUP.

¹⁶²⁹ *See* III.C.8.(d): National Security Council (NSC).

¹⁶³⁰ *See* P.TREANOR:P2536,para.269; D394; R.THEUNENS:P3033,pp.265-267; P3050; III.C.8.(d): National Security Council (NSC).

¹⁶³¹ P3051.

¹⁶³² P1087.

¹⁶³³ P3050.

¹⁶³⁴ P3050.

¹⁶³⁵ P1087.

¹⁶³⁶ P1087.

¹⁶³⁷ D406.

¹⁶³⁸ P2627, showing also the cooperation with the JNA.

¹⁶³⁹ P3078.

to the VRS;¹⁶⁴⁰ status and take-over of the special purpose industry;¹⁶⁴¹ establishment of State Commission for exchange of PoWs and dead;¹⁶⁴² and the transfer of weapons from Serbia.¹⁶⁴³

459. **KARADŽIĆ**'s pre-existing command authority through the SDS—functioning long before the NSC's establishment—was an additional source of authority. As discussed above,¹⁶⁴⁴ **KARADŽIĆ** issued military-related orders to municipal presidents through the "chain of command" which ran from **KARADŽIĆ** to municipal presidents¹⁶⁴⁵ who were members of the local TOs.¹⁶⁴⁶

460. The TO was declared an "armed force of SBH" on 16 April 1992, by order of Acting TO Commander and Minister of Defence Bogdan SUBOTIĆ.¹⁶⁴⁷ The order also called for general mobilisation and for cooperation with JNA units and "where possible, establish a unified command". The order thus echoed on a state level the Variant A/B instructions, which directed CS's to assist with mobilisation of the Serb TO, police and civil defence, and cooperate with the JNA.¹⁶⁴⁸ Until the VRS's establishment, CS's participated in the command and control of Serb TO "infantry units".¹⁶⁴⁹ After the VRS's formation, most TO units were renamed as "light infantry brigades" and integrated into existing VRS commands.¹⁶⁵⁰

(1) Paramilitaries/Volunteers/Serbian MUP

461. **KARADŽIĆ** and other JCE members also used paramilitary and volunteer formations to implement the common purpose. The BSL¹⁶⁵¹ and the Serbian

¹⁶⁴⁰ D409; D406.

¹⁶⁴¹ D409.

¹⁶⁴² D409. *See also* P1087.

¹⁶⁴³ P3079, showing again cooperation with the authorities in Belgrade.

¹⁶⁴⁴ *See* III.C.1: Preparations to create a Serb-dominated state within Bosnia.

¹⁶⁴⁵ P6510,p.7.

¹⁶⁴⁶ P.TREANOR:P2536,paras.267-270.

¹⁶⁴⁷ P2412. *See also* P3050.

¹⁶⁴⁸ P1634,p.23.

¹⁶⁴⁹ D325,p.13.

¹⁶⁵⁰ E.BROWN:P3914,pp.68-75; D325,p.13; P1505; P1509; D.HANSON:P2589,para.82;

D.HANSON:T.14570; R.THEUNENS:P3033,pp.316-318.

¹⁶⁵¹ M.DAVIDOVIĆ:P2848,para.55; M.DAVIDOVIĆ:T.15464-15465; [REDACTED]; R.THEUNENS:P3033,pp.173-205,279-282,289,320-329;

D.HANSON:P2589,para.75. *See e.g.* P1478,pp.250,252,263-270; P3384; [REDACTED]; P1106; P5669; P2629; D1612,p.11. *See also* P2914; D1591; P1105,p.20; M.STANIŠIĆ:T.46385-46386.

leadership in Belgrade (in particular the SDB)¹⁶⁵² coordinated the formation, training, support and use of paramilitary and volunteer units.

462. In his July 1992 report on paramilitary formations to the VRS-GŠ, TOLIMIR identified the main characteristics of the paramilitary formations operating in BiH, noting that "[m]any formations [...] display hatred of non-Serbian peoples and one can conclude without reservations that are the genocidal element among the Serbian people".¹⁶⁵³

463. A number of paramilitary groups, including ARKAN's Serbian Volunteer Guard and ŠEŠELJ's men, had been involved in the Croatian campaign before arriving to BiH.¹⁶⁵⁴ ARKAN's unit was stationed in Erdut, Croatia, where it ran a training camp.¹⁶⁵⁵ The unit members called themselves "the Serbian Tigers", whose purpose was "the capture of Croatian held villages".¹⁶⁵⁶ It was infamous for its cruelty.¹⁶⁵⁷ ARKAN was subordinated to the Serbian MUP.¹⁶⁵⁸ J.STANIŠIĆ controlled the unit through the Serbian DB operatives, including Radoslav KOSTIĆ, a.k.a. Rade.¹⁶⁵⁹

464. From the outset, J.STANIŠIĆ worked with **KARADŽIĆ** in pursuit of territory. As early as May 1991, he and **KARADŽIĆ** were clandestinely studying maps of Bosnian municipalities in **KARADŽIĆ**'s apartment.¹⁶⁶⁰ **KARADŽIĆ** and J.STANIŠIĆ remained in frequent contact discussing and coordinating plans for Serb activities in Croatia and BiH.¹⁶⁶¹ On 22 January 1992, while discussing what would happen if Serbs and Croats did not reach agreement on Croatia and Bosnia,

¹⁶⁵² P6388,pp.3-4; M.DAVIDOVIĆ:P2848,para.66; P2852/P4263(partial duplicates). *See also* P1484,pp.53-58.

¹⁶⁵³ P2855,pp.1-2.

¹⁶⁵⁴ H.OKUN:P776,pp.12-13; M.BABIĆ:P742,pp.54-56.

¹⁶⁵⁵ D1612,p.14; M.DAVIDOVIĆ:P2848,para.125; P2021.

¹⁶⁵⁶ P2021.

¹⁶⁵⁷ A.VASILJEVIĆ:T.34700; P5589; P2021; H.OKUN:T.1513. *See also* M.STANIŠIĆ:T.46385-46386.

¹⁶⁵⁸ M.DAVIDOVIĆ:P2848,para.125.

¹⁶⁵⁹ R.THEUNENS:P3033,pp.185-189; M.DAVIDOVIĆ:P2848,paras.80,121,125; [REDACTED]; M.MARTIĆ:T.38125,38138-38141; P6314,pp.3-4; P6315,pp.2-4; P3153; P1473,p.213; P1489,pp.53,72-73; P6210; [REDACTED].

¹⁶⁶⁰ M.BABIĆ:P741,pp.97-98; M.BABIĆ:P742,pp.28-30.

¹⁶⁶¹ P2223; P5614; P5801; P5872; P5788; P5772; P5773; P5771; P5768; D301; P5622.

J.STANIŠIĆ told **KARADŽIĆ**, "[o]r we'll exterminate them completely so let's see where we'll end up."¹⁶⁶²

465. At the commencement of the takeovers, ARKAN went to BiH¹⁶⁶³ to do what he had done in Croatia, *i.e.*, to use "an argument of self defence to extend their control into formerly mixed areas".¹⁶⁶⁴ As Mićo STANIŠIĆ explained, ARKAN's men came to Bijeljina and Zvornik to help the Bosnian Serbs liberate territory they believed should become part of RS, pursuant to an agreement that ARKAN and his men could take whatever property and war booty they wanted as "the price to pay for their engagement there".¹⁶⁶⁵ During the takeovers ARKAN coordinated his activities with the local Serb Forces and authorities.¹⁶⁶⁶ PLAVŠIĆ received "Mr Arkan and his associates"¹⁶⁶⁷ in the Bijeljina CS premises in the midst of the takeover. A video of her kissing ARKAN in front of the Bijeljina town hall was played on television.¹⁶⁶⁸

466. By 4 April 1992, the town of Bijeljina was "controlled by the SDS and Arkan's men".¹⁶⁷⁰ ARKAN thereafter transferred his focus to Zvornik, where on 9-10 April 1992 his forces participated in taking control of Zvornik in the course of a single morning, killing civilians and forcing over 20,000 Muslims out.¹⁶⁷¹ Such impressive results could not have been achieved without well organised and synchronised operations of the paramilitary formations and the Serb authorities.¹⁶⁷² As **KARADŽIĆ** said, one of the reasons the Bosnian Serbs had not formed an army by that time was because they "had strong support from the State Security".¹⁶⁷³

467. Sometime during April or May 1992, **KARADŽIĆ**, SIMATOVIĆ, ARKAN and others met in Belgrade to discuss further activities of the Federal and Serbian

¹⁶⁶² D301,p.7.

¹⁶⁶³ P6388,pp.3-4; [REDACTED] M.DAVIDOVIĆ:P2848,para.117; H.OKUN:T.1513-1514.

¹⁶⁶⁴ P2002; *See* Bijeljina, Zvornik, Brčko Summaries.

¹⁶⁶⁵ M.DAVIDOVIĆ:P2848,p.24.

¹⁶⁶⁶ *See* Bijeljina, Zvornik, Brčko, Iliđa Summaries.

¹⁶⁶⁷ P6211,p.8.

¹⁶⁶⁸ P1108.

¹⁶⁶⁹ [REDACTED]; [REDACTED]

¹⁶⁷⁰ P5474,p.1; Bijeljina Summary.

¹⁶⁷¹ *See* Zvornik Summary.

¹⁶⁷² T.BANBURY:T.13338; P6388,p.4.

¹⁶⁷³ P1478,p.133.

MUP forces.¹⁶⁷⁴ **KARADŽIĆ** said that they had arranged that ARKAN be involved in Sarajevo in order to support Serb efforts there.¹⁶⁷⁵ PLAVŠIĆ discussed with ARKAN's deputy having ARKAN come to Sarajevo.¹⁶⁷⁶

468. These arrangements with ARKAN were part of a broader BSL policy of seeking assistance from paramilitaries. PLAVŠIĆ told the Assembly in November 1992 that she sent letters to people "willing to fight for the Serbian cause [...] to ŠEŠELJ, Arkan and JOVIĆ [...]".¹⁶⁷⁷

469. ŠEŠELJ's volunteers also contributed to the takeover of Bijeljina, Zvornik and Brčko.¹⁶⁷⁸ ŠEŠELJ took the position that BiH was Serbian,¹⁶⁷⁹ and that those who did not like that would "have to pack their suitcases and leave";¹⁶⁸⁰ supported the SDS policies in BiH,¹⁶⁸¹ and referred to **KARADŽIĆ** as a "true friend"¹⁶⁸² and the "true leader of the Serbian people" who "enjoys undivided trust".¹⁶⁸³

470. ŠEŠELJ's men took part in combat operations throughout BiH.¹⁶⁸⁴ Among his men involved in Sarajevo were: the group of Branislav GAVRILOVIĆ, a.k.a. BRNE, in Ilidža, Slavko ALEKSIĆ's group in Grbavica, Jovo OSTOJIĆ's "Šoša detachment" in Vogošća and the group of Vasilije VIDOVIĆ, a.k.a. VASKE, in Ilijaš.¹⁶⁸⁵

471. As with ARKAN's forces, the BSL, including **KARADŽIĆ**, was well aware of those efforts. When GAVRILOVIĆ's group was encircled while conducting operations in late April 1992, ŠEŠELJ threatened to withdraw all of his men and to "never deploy them again", if his men were not extracted.¹⁶⁸⁶ He tried to reach **KARADŽIĆ**,¹⁶⁸⁷ and talked to MANDIĆ who in turn made contact with the forces on

¹⁶⁷⁴ M.DAVIDOVIĆ:P2848,para.66.

¹⁶⁷⁵ M.DAVIDOVIĆ:P2848,para.55; M.DAVIDOVIĆ:T.15464-15465. *See* Pale, Ilidža, Novi Grad Summaries.

¹⁶⁷⁶ P1106,p.1; P5669; D1248,pp.8-9,13,18; N.PRSTOJEVIĆ:T.13829-13832.

¹⁶⁷⁷ P1105,p.20. *See also* M.STANIŠIĆ:T.46385-46386.

¹⁶⁷⁸ P6388,pp.3-4; V.ŠEŠELJ:T.39569-39573. *See* Bijeljina, Zvornik, Brčko Summaries.

¹⁶⁷⁹ V.ŠEŠELJ:D3665,para.15; V.ŠEŠELJ:T.39547-39548; P6389; P6390; P6391; P6392.

¹⁶⁸⁰ V.ŠEŠELJ:T.39547-39548; P6387,p.6.

¹⁶⁸¹ P2527,p.1.

¹⁶⁸² P6388,p.1.

¹⁶⁸³ V.ŠEŠELJ:T.39543-39544; P6387,pp.1-2; P2527,p.1.

¹⁶⁸⁴ Bijeljina, Zvornik, Brčko, Vogošća, Ilidža, Novo Sarajevo Summaries.

¹⁶⁸⁵ R.THEUNENS:P3033,pp.20,327-328. *See also* P5630; P5713.

¹⁶⁸⁶ P2228. *See also* P1148.

¹⁶⁸⁷ P2228,p.1; P5707.

the ground directing that they pull out the encircled group.¹⁶⁸⁸ At the time, GAVRILOVIĆ was taking part in combat operations along with the Serb TO units, and was issued weapons by the RS MUP and Minister M.STANIŠIĆ.¹⁶⁸⁹ Similarly, ALEKSIĆ, who fought alongside the VRS at Grbavica, was a member of the Novo Sarajevo SDS municipal board and in personal contact with **KARADŽIĆ** in 1991.¹⁶⁹⁰

472. Paramilitaries and volunteers committed serious crimes, detailed elsewhere.¹⁶⁹¹ In particular the volunteers and paramilitaries associated with ARKAN and ŠEŠELJ were widely known and feared for committing atrocities against non-Serbs that were extensively reported from 1991 onwards.¹⁶⁹²

473. **KARADŽIĆ** was aware of the criminal propensity of paramilitary units through his various channels of communication and his contacts with local authorities and internationals.¹⁶⁹³

474. Despite this information, **KARADŽIĆ** and the BSL continued to use ARKAN and ŠEŠELJ's men throughout the conflict period. ARKAN remained at **KARADŽIĆ**'s disposal whenever needed to "protect Serbian nationality and Orthodoxy".¹⁶⁹⁴ In September 1992, ARKAN's unit participated in the attack on Čelić near Brčko alongside VRS units.¹⁶⁹⁵ In 1995, **KARADŽIĆ** brought ARKAN to BiH again with the support of the Serbian MUP and J.STANIŠIĆ.¹⁶⁹⁶ During that time, as MLADIĆ informed **KARADŽIĆ**, ARKAN abused VRS members and "liquidated a certain number of loyal Muslim citizens, including family members of some VRS servicemen".¹⁶⁹⁷ As a result, it was agreed that ARKAN's men leave BiH.¹⁶⁹⁸ ARKAN's unit left BiH in the same style they had come to BiH several years earlier.

¹⁶⁸⁸ P1148.

¹⁶⁸⁹ P6640. *See also* P2302.

¹⁶⁹⁰ P6056; Z.SALIPUR:T.31641-31645; D825,p.26.

¹⁶⁹¹ *See* Bijeljina, Zvornik Summaries.

¹⁶⁹² A.VASILJEVIĆ:T.34700; P5589; P2021; H.OKUN:T.1513; [REDACTED]. *See also* M.STANIŠIĆ:T.46385-46386;

R.THEUNENS:P3033,pp.175-176,187-189.

¹⁶⁹³ P5594; M.BELL:P1996,paras.24-26; M.BELL:T.9785-9789; C.DOYLE:T.2910-2911,2931-2933; C.DOYLE:P918,p.29; [REDACTED]; H.OKUN:T.1515; P780,p.38; M.DAVIDOVIĆ:T.15464-15465; M.DAVIDOVIĆ:P2848,paras.54-55; P1478,pp.219-222,246,250,270; P2900; P2855.

¹⁶⁹⁴ P2854.

¹⁶⁹⁵ Ž.FILIPOVIĆ:T.35806-35807.

¹⁶⁹⁶ M.MILOVANOVIĆ:T.25455-25458; P3056,p.3; P1473,pp.209,213; P1489,pp.48,53,72-73.

¹⁶⁹⁷ P3056,p.2. *See also* M.MILOVANOVIĆ:T.25456.

¹⁶⁹⁸ M.MILOVANOVIĆ:T.25455-25458.

KARADŽIĆ lined them up in front of the town hall in Bijeljina and awarded them for their achievements. He kissed ARKAN at the same location in Bijeljina as PLAVŠIĆ did during the very first Serb takeover.¹⁶⁹⁹

475. Similarly, ŠEŠELJ remained in contact with the BSL. In May 1993, he toured the frontlines in Sarajevo and met the BSL, including **KARADŽIĆ**, at Pale.¹⁷⁰⁰ His volunteers continued to fight along the VRS units, such as VASKE's and ALEKSIĆ's Chetniks around Sarajevo.¹⁷⁰¹

476. Apart from forces that came from Serbia, there were also paramilitary formations established with SDS support, such as the Serbian Defence Forces ("SOS"), paramilitary formations which played a significant role in key locations in the city of Banja Luka¹⁷⁰² and in the takeover of Sanski Most.¹⁷⁰³ The SOS paramilitary group under Nenad STEVANDIĆ, a close associate of **KARADŽIĆ** and ARK official,¹⁷⁰⁴ operated in Banja Luka municipality in spring and summer of 1992.¹⁷⁰⁵ [REDACTED]

477. Once paramilitaries had played their role in the permanent, forcible removal of non-Serbs from territories sought by the BSL, some of them turned their criminal propensities towards Serbs. Having looted the property of non-Serbs who had been cleansed, "once they ran out of Muslim houses they switched to robbing Serb houses",¹⁷⁰⁸ and "even killing [Serbs]".¹⁷⁰⁹ It was only then that the authorities sought to get rid of them.¹⁷¹⁰ As Momir BULATOVIĆ explained at the SDC session on 7 August 1992: "Let's be honest, we needed those paramilitary formations for a while. They are now a great burden and a problem".¹⁷¹¹

¹⁶⁹⁹ P2858; P1108. *See also* M.DAVIDOVIĆ:T.15714-15715.

¹⁷⁰⁰ P2445; D3666; KDZ354:T.13199-13202.

¹⁷⁰¹ D825,p.26.

¹⁷⁰² P6522,p.1; AF2224-AF2226.

¹⁷⁰³ P3397; [REDACTED]. *See* Sanski Most Summary.

¹⁷⁰⁴ *See* III.C.8.(g).(vii): The ARK as an example of CS implementation of the common criminal plan.

¹⁷⁰⁵ AF2223-AF2226.

¹⁷⁰⁶ [REDACTED].

¹⁷⁰⁷ [REDACTED].

¹⁷⁰⁸ D.ANDAN:T.40829-40830. *See also* M.DAVIDOVIĆ:P2848,paras.52,78-79; D1412,p.5; P2888,p.5; D.PLANOJEVIĆ:D3197,paras.29-30; P36.

¹⁷⁰⁹ P2855,p.3.

¹⁷¹⁰ M.DAVIDOVIĆ:P2848,para.72.

¹⁷¹¹ P6165,p.5; M.BULATOVIĆ:T.34565-34567.

478. For example, the Yellow Wasps—a paramilitary group responsible for systematic crimes against Zvornik’s non-Serbs¹⁷¹²—“overstepped the limit”¹⁷¹³ when they stopped and harassed Minister OSTOJIĆ at a checkpoint outside Zvornik on 26 July 1992, which triggered an operation to disarm paramilitary formations.¹⁷¹⁴ Members of the Yellow Wasps were detained and charged with the theft of vehicles and other property at checkpoints¹⁷¹⁵ despite the knowledge that they had committed far worse crimes against non-Serbs.¹⁷¹⁶ Arrested paramilitary members were released shortly after¹⁷¹⁷ with no criminal trial conducted.¹⁷¹⁸ During the operation, the unit of Yellow Wasps was disbanded,¹⁷¹⁹ around 40 paramilitary members were returned to Serbia and banned from entering the RS,¹⁷²⁰ and others returned to units of the VRS.¹⁷²¹

479. Other paramilitary formations taken into custody in Brčko and Bijeljina were also either released or taken to the border and handed over to the Serbian police and also not prosecuted for their crimes against the non-Serb population.¹⁷²²

480. The BSL’s support for the paramilitaries from the beginning of the conflict and their failure to take any genuine steps to punish the paramilitaries for systematic crimes committed against non-Serbs¹⁷²³ belies the Defence contention¹⁷²⁴ that these were out-of-control groups whose activities the authorities disapproved of. On 28 July

¹⁷¹² See Zvornik Summary.

¹⁷¹³ B.ĐERIĆ:T.28041.

¹⁷¹⁴ V.OSTOJIĆ:D2361,pp.31-32; V.OSTOJIĆ:D2362,para.45; M.DAVIDOVIĆ:P2848,paras.126-127; P6435,p.2; D.ANDAN:T.40885-40887,40907; [REDACTED]

[REDACTED]. See Zvornik, Bijeljina, Brčko Summaries.

¹⁷¹⁵ P2882; M.DAVIDOVIĆ:T.15522-15524; [REDACTED]

[REDACTED]; P2855,p.3; P36; P2903; P2882,p.3.

¹⁷¹⁶ M.DAVIDOVIĆ:P2848,para.141; [REDACTED]

[REDACTED]; P2904,p.3.

¹⁷¹⁷ P2905; M.DAVIDOVIĆ:P2848,paras.142,144,168; [REDACTED];

Zvornik Summary.

¹⁷¹⁸ P6435,p.3; D.ANDAN:T.40887-40888; R.THEUNENS:P3033,p.403; [REDACTED]; D482;

¹⁷¹⁹ KDZ555:T.17313.

¹⁷²⁰ D1418.

¹⁷²¹ KDZ555:T.17313; KDZ340:T.17528-17529; E.BROWN:P3914,pp.84-86; D825,p.26. See also D1076; P5404.

¹⁷²² D.ANDAN:D3774,pp.109-112,122-127,318-319,323-327;

M.DAVIDOVIĆ:P2848,paras.80,103,105,107,110; M.DAVIDOVIĆ:T.15612,15614. See also

D.SPASOJEVIĆ:T.35857-35864; P6218,p.5,fn.101; P6219.

¹⁷²³ See III.D.2: KARADŽIĆ failed to prevent common purpose crimes or punish the perpetrators.

¹⁷²⁴ See e.g. M.STANIŠIĆ:T.46376-46382,46553-46556; M.VASILIĆ:D3693,paras.33-45; M.VASILIĆ:T.39970-39971; J.IVANOVIĆ:D3692,paras.25-31; D.ANDAN:D3774,pp.81-82,102-104,126-135,159-176; D.ANDAN:T.40827-40833; D.PLANOJEVIĆ:D3197,paras.24-30; M.ĐURIĆ(KW117):T.35021-35023; C.SIMIĆ:T35709-35713.

1992, MLADIĆ issued an order to incorporate paramilitary formations into the VRS and arrest those who disobeyed.¹⁷²⁵ While his order states that criminal proceedings are to be initiated against those paramilitaries who have committed crimes,¹⁷²⁶ the BSL's clear goal was to incorporate the paramilitaries into VRS ranks¹⁷²⁷ rather than to combat crimes against the non-Serb population.¹⁷²⁸

481. As discussed above, members of the notorious Yellow Wasps unit were incorporated into the VRS. The SOS, infamous for its crimes against non-Serbs in Sanski Most,¹⁷²⁹ was incorporated into the 1KK 6th Brigade;¹⁷³⁰ one of its members who subsequently executed Croat villagers was not tried until after the war.¹⁷³¹ Borislav RADIĆ's Special Detachment, comprised mostly of criminals, was incorporated directly into the VRS's Vogošća Brigade.¹⁷³² Equally, having terrorised the Muslims of Prnjavor municipality prior to the conflict,¹⁷³³ Veljko MILANKOVIĆ's unit was incorporated into the VRS,¹⁷³⁴ where they and their "legendary commander" MILANKOVIĆ were praised by KRAJIŠNIK as "history's favourites" for their "difficult but glorious" war path.¹⁷³⁵ Thus, most of these paramilitary formations were incorporated into the VRS or the police,¹⁷³⁶ many of them fighting—in MILOVANOVIĆ's words—as VRS "shock troops" that "won considerable glory".¹⁷³⁷

482. Many of those paramilitaries that were purportedly banned from RS territory¹⁷³⁸ remained in or returned to the RS,¹⁷³⁹ and paramilitary units were replenished with new members from Serbia throughout 1992.¹⁷⁴⁰

¹⁷²⁵ P1500. *See also* D93/P3057(duplicates); D1933.

¹⁷²⁶ P1500,p.2.

¹⁷²⁷ E.BROWN:P3914,paras.2.57-2.72; E.BROWN:T.21699-21700; D825,pp.22,26.

¹⁷²⁸ E.BROWN:P3914,paras.2.57-2.72; E.BROWN:T.21700-21701.

¹⁷²⁹ *See* Sanski Most Summary.

¹⁷³⁰ P6680; P6681; P3397.

¹⁷³¹ *See* SIC:A.12.5.

¹⁷³² *See* Vogošća Summary.

¹⁷³³ P3000,pp.4-5.

¹⁷³⁴ A.GRAHOVAC:T44045-44046.

¹⁷³⁵ P3001. *See* A.GRAHOVAC:T44050-44051(confirming this same Vukovi group referenced in P2855).

¹⁷³⁶ P2855,pp.3-5.

¹⁷³⁷ D825,p.26.

¹⁷³⁸ D1418; B.GRUJIĆ:T.40452-40453. *See also* D.ANDAN:T.40874-40875; M.DAVIDOVIĆ:T.15674-15675.

¹⁷³⁹ [REDACTED]; D1416; D1418; P3387; D1637; D1638;

C.NIELSEN:P2958,para.367.

¹⁷⁴⁰ D.ANDAN:T.40874-40875; D.ANDAN:D3774,pp.350-354; A.VASILJEVIĆ:T.34703.

9. KARADŽIĆ had a comprehensive communications network

483. **KARADŽIĆ** had a comprehensive communications network at his disposal throughout the conflict, through which he was in near constant communication with his civilian and military subordinates throughout the RS. In **KARADŽIĆ**'s words, "[m]y desk is a screen which reflects everything that is going on [in] the country, both good and bad".¹⁷⁴¹

(a) Communications systems at **KARADŽIĆ**'s disposal

(i) Republic Communications Centre

484. In March 1992, **KARADŽIĆ** announced the establishment of the Republic Communications Centre ("RCC") to all municipality presidents, and directed that regional and municipal operations centres be set up.¹⁷⁴²

485. The purpose of the RCC, operational from 10 April 1992,¹⁷⁴³ was to service the civilian republican and municipal leadership.¹⁷⁴⁴ Regional communications centres were located in Banja Luka, Bijeljina, Zvornik and Bileća and municipal communications centres existed in all municipalities.¹⁷⁴⁵

486. The RCC was equipped with telephones, short wave and ultra-short wave radios, fax machines, teleprinters, radio relay communications, wire communications, a developed courier system,¹⁷⁴⁶ and VATRA, a back-up radio communication system.¹⁷⁴⁷ Generators would be used during power cuts.¹⁷⁴⁸

487. The RCC, RS MUP, and VRS assisted each other in order to ensure that communication was uninterrupted and "with a view to creating the most resistant and resilient system of communications".¹⁷⁴⁹

(ii) RS MUP communications

¹⁷⁴¹ P1473,p.124.

¹⁷⁴² P2560.

¹⁷⁴³ P2804. *See also* R.VUKOVIĆ:P2794,para.45.

¹⁷⁴⁴ R.VUKOVIĆ:P2794,p.4.

¹⁷⁴⁵ R.VUKOVIĆ:P2794,paras.49-50,64. *See also* M.SAJIĆ,D4114,para.38.

¹⁷⁴⁶ R.VUKOVIĆ:P2794,pp.4-5,paras.30-31.

¹⁷⁴⁷ R.VUKOVIĆ:P2794,paras.7-9.

¹⁷⁴⁸ M.SAJIĆ:T.44174-44175.

¹⁷⁴⁹ R.VUKOVIĆ:P2794,p.50. *See also* R.VUKOVIĆ:P2794,paras.11,13,29; D.KEZUNOVIĆ:T.15083.

488. From the beginning of the conflict, the MUP established effective communications between the MUP, CSBs and SJBs.¹⁷⁵⁰ The MUP established communications centres in Vraca (in the early weeks of the war), Pale and Bijeljina.¹⁷⁵¹ Its communications network included shortwave radio, ultra shortwave radio, telephone, telegraph, fax and teleprinters.¹⁷⁵² At Pale, employees worked around the clock in three shifts, sleeping in the building to ensure constant coverage.¹⁷⁵³ Generators were used by the MUP¹⁷⁵⁴ and in individual CSBs and SJBs¹⁷⁵⁵ to ensure continuity during power cuts. CSBs could communicate directly with each other.¹⁷⁵⁶ The MUP also used couriers throughout the war.¹⁷⁵⁷ "[T]here was always some way of communication".¹⁷⁵⁸

489. Multiple daily dispatches were received and sent by the MUP headquarters between April and December 1992.¹⁷⁵⁹ M.STANIŠIĆ ordered his subordinates to report up the chain of command,¹⁷⁶⁰ and CSBs and SJBs did so.¹⁷⁶¹ On 22 April 1992, the RS Government ordered the MUP to report daily on the situation in RS territory,¹⁷⁶² whose bulletins included reports on subordinate SJBs.¹⁷⁶³ These daily bulletins were forwarded to the Presidency.¹⁷⁶⁴

(iii) VRS communications

490. **KARADŽIĆ** also had the VRS communication system—a highly sophisticated mix of hard-wire and radio relay links—at his disposal.¹⁷⁶⁵ The centre of this web was the VRS-GŠ communications headquarters located at Crna Rijeka,

¹⁷⁵⁰ See e.g. D.KEZUNOVIĆ:P2743,paras.21,84; P2760,p.8.

¹⁷⁵¹ D.KEZUNOVIĆ:P2743,para.2,p.84; D.KEZUNOVIĆ:T.14958; R.VUKOVIĆ:P2794,para.13.

¹⁷⁵² D.KEZUNOVIĆ:P2743,paras.6-7.

¹⁷⁵³ D.KEZUNOVIĆ:P2743,para.11.

¹⁷⁵⁴ D.KEZUNOVIĆ:P2743,para.12.

¹⁷⁵⁵ D.KEZUNOVIĆ:P2743,para.12.

¹⁷⁵⁶ D.KEZUNOVIĆ:P2743,para.9.

¹⁷⁵⁷ D.KEZUNOVIĆ:P2743,para.14. See also D.KEZUNOVIĆ:P2743,p.21.

¹⁷⁵⁸ D.KEZUNOVIĆ:P2743,para.10. See also D.KEZUNOVIĆ:P2743,p.16.

¹⁷⁵⁹ P2761,p.23. See also e.g. P2760,p.8; D1367; P2750,pp.1,3-4,7-8,22,25; P2752; D1366;

D.KEZUNOVIĆ:P2743,pp.38-43; D.KEZUNOVIĆ:T.14954-19957; P2744, explained at

D.KEZUNOVIĆ:T.14943-14946.

¹⁷⁶⁰ P2715; C.NIELSEN:P2958,paras.236,389; C.NIELSEN:T.16270-16272; P2761,pp.22-23.

¹⁷⁶¹ See e.g. P2763; P2751; P2769; P2770; P2765; P2772; P2773; D1367; P2775; P2780. See also

Municipality Summaries.

¹⁷⁶² P3051,p.2. See also C.NIELSEN:P2958,para.236; C.NIELSEN:T.16270-16272.

¹⁷⁶³ See e.g. P2748; P2749; P2790; P2791; P2792; P2762; P2753; P2754; P2755; P2756. See also

D.KEZUNOVIĆ:T.14950-14951; D.KEZUNOVIĆ:T.14965-14967.

¹⁷⁶⁴ C.NIELSEN:T.16270-16271; P2761,p.23.

¹⁷⁶⁵ M.MILOVANOVIĆ:T.25472-25473.

which was connected to Pale so **KARADŽIĆ** and other BSL members could be connected to the VRS-GŠ and Corps Commands.¹⁷⁶⁶ The VRS took over the existing JNA communications system at Crna Rijeka,¹⁷⁶⁷ ensuring unbroken communications from the date of the VRS's establishment.¹⁷⁶⁸ **KARADŽIĆ** received regular VRS reports from the field.¹⁷⁶⁹ The VRS system was functional throughout the conflict, except for two hours in late August 1995.¹⁷⁷⁰

(iv) PTT communications

491. Both the civilian authorities and the army had access to the civilian telephone system (PTT or public telecommunications network).¹⁷⁷¹

(v) Couriers

492. Even during the limited times that communication lines with local municipalities were not working, couriers were available to deliver and receive messages. If an RCC courier was not available, **KARADŽIĆ** used his personal drivers to deliver messages.¹⁷⁷²

(vi) State security

493. Head of RS DB Dragan KIJAC testified that the DB's priority was to obtain and distribute information.¹⁷⁷³ KIJAC met **KARADŽIĆ** at least four or five times per month.¹⁷⁷⁴ The DB also shared information with the VRS.¹⁷⁷⁵

(vii) Visits by **KARADŽIĆ** and republican representatives

494. In addition to the sophisticated communications systems at **KARADŽIĆ**'s disposal, he and other members of the BSL travelled to the field and met local

¹⁷⁶⁶ P2795; P2796; P2797; P2798.

¹⁷⁶⁷ A.DŽAMBASOVIĆ:P2828,para.10.

¹⁷⁶⁸ M.MILOVANOVIĆ:T.25437-25439.

¹⁷⁶⁹ See III.C.8.(i).d: Situational awareness.

¹⁷⁷⁰ M.MILOVANOVIĆ:T.25474; R.VUKOVIĆ:P2794,para.24; P2825; P2826.

¹⁷⁷¹ R.VUKOVIĆ:P2794,para.3.

¹⁷⁷² R.VUKOVIĆ:P2794,paras.52-53. See also N.RISTIĆ:T.15382.

¹⁷⁷³ D.KIJAC:T.44327. See also P5557,p.8.

¹⁷⁷⁴ D.KIJAC:T.44321.

¹⁷⁷⁵ D.KIJAC:T.44321-44322.

military and civilian leaders.¹⁷⁷⁶ For example, from the beginning of the war, **KARADŽIĆ** and **KRAJIŠNIK** generally went to Bijeljina weekly on their way to Belgrade.¹⁷⁷⁷ On 18 April 1992, **KARADŽIĆ** visited Iliđža¹⁷⁷⁸ and encouraged **PRSTOJEVIĆ** in "driving the Muslims out of the territories where they had actually been majority".¹⁷⁷⁹ Hadžići CS President Ratko **RADIĆ** spent much of his time with **KARADŽIĆ** in Pale during the critical period at the beginning of the conflict.¹⁷⁸⁰ After the 16th Assembly session, attended by representatives from all over the RS¹⁷⁸¹ **KARADŽIĆ**, **MLADIĆ** and other JCE members continued to meet with municipal representatives throughout summer 1992, meeting with:

- Municipal representatives from Rogatica, Sokolac and neighbouring municipalities in Sokolac on 17 May 1992;¹⁷⁸²
- the ARK military and civilian leadership in Banja Luka on 2 June (where **BRĐANIN** updated them on the "problem" of 14,500 Muslims);¹⁷⁸³
- municipality representatives including from Novo Sarajevo, Iliđža, Vogošća and Bratunac on 6 June (where they were updated on the complete "liberat[ion]" of Bratunac town, free of Muslims);¹⁷⁸⁴
- military and civilian authorities from Zvornik, Vlasenica, Srebrenica and Bratunac and surrounding areas in Zvornik on 30 June (where they were updated on the expulsion of Muslims from Zvornik);¹⁷⁸⁵

¹⁷⁷⁶ See III.C.5.(c): The strategic objectives were transformed into concrete results on the ground. See also III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose; III.C.8.(i).d: Situational awareness.

¹⁷⁷⁷ M.DAVIDOVIĆ:P2848,para.86.

¹⁷⁷⁸ N.PRSTOJEVIĆ:T.12965,13012-13015; R.KEZUNOVIĆ:P2526,para.69.

¹⁷⁷⁹ D92,p.66.

¹⁷⁸⁰ T.GLAVAŠ:P2296,paras.24-25.

¹⁷⁸¹ See III.C.5: Formalisation of ethnic separation at the 16th Assembly and establishment of VRS to implement; P6373 detailing 16th Assembly Session attendees, including **BRĐANIN** (ARK), **BOGIĆ** (Bosanski Novi), **BUHA** (Sarajevo), **ERCEG** (Banja Luka), **KASAGIĆ** (Banja Luka), **KUPREŠANIN** (Banja Luka), **Dragoljub MIČIĆ** (Bijeljina), **Marko SIMIĆ** (Sokolac), **SRDIĆ** (Prijedor), **VESELINOVIĆ** (Pale), **VOJINOVIĆ** (Brčko).

¹⁷⁸² P1477,p.349; P6254; M.BJELICA:T.36443-36447.

¹⁷⁸³ P1478,pp.53-61; R.BRĐANIN:T.43681-43682; [REDACTED]

¹⁷⁸⁴ P1478,pp.93-111.

¹⁷⁸⁵ P1478,pp.246-272; [REDACTED]

- Assembly representatives from all over the RS¹⁷⁸⁶ at the 17th Session in July, where they were informed (a) of a huge problem with the thousands of "captured people of other nationalities";¹⁷⁸⁷ (b) that the Muslims were people "whose executioners we are to be";¹⁷⁸⁸ (c) that the number of Muslims in Birač had hopefully been "halved";¹⁷⁸⁹ and (d) of the Sarajevo authorities' success—with **KARADŽIĆ**'s encouragement—in forcibly removing Muslims;¹⁷⁹⁰
- Assembly representatives from all over the RS¹⁷⁹¹ at the 18th Session in August 1992;¹⁷⁹² and
- military representatives and civilian officials from municipalities including Bijeljina and Brčko in September 1992.¹⁷⁹³

495. In addition, **KARADŽIĆ**'s close associates visited the municipalities. For example, **PLAVŠIĆ** was amongst a high-ranking delegation to Bijeljina in the immediate aftermath of its takeover, where she met with the CS and **ARKAN**, and praised him for a job well done.¹⁷⁹⁴ **KRAJIŠNIK**¹⁷⁹⁵ [REDACTED] visited Zvornik in the days before its takeover, [REDACTED]

[REDACTED]
Velibor **OSTOJIĆ** took an active part in the Foča takeover,¹⁷⁹⁸ reporting back to the

¹⁷⁸⁶ See P6373 detailing 17th Assembly attendees, including **GAKOVIĆ**, **BOGIĆ** (Bosanski Novi), **BOSILJČIĆ** (Iliđža), **BUHA**, **TRBOJEVIĆ** (Sarajevo), **ČANČAR** (Foča), **KASAGIĆ**, **KUPREŠANIN** (Banja Luka), **MAKSIMOVIĆ** (Sarajevo), **Dragoljub MIČIĆ**, **NOVAKOVIĆ** (Bijeljina), **Jovo MIJATOVIĆ** (Zvornik), **RAŠULA** (Sanski Most), **SAVKIĆ** (Milići), **Marko SIMIĆ** (Sokolac), **VESELINOVIĆ** (Pale), **VOJINOVIĆ** (Brčko), **SRDIĆ** (Prijeđor).

¹⁷⁸⁷ D92,p.32.

¹⁷⁸⁸ D92,p.41(emphasis added).

¹⁷⁸⁹ D92,p.73.

¹⁷⁹⁰ D92,p.66.

¹⁷⁹¹ See P6373 detailing 18th Assembly Attendees, including **BOGIĆ**, **GAKOVIĆ** (Bosanski Novi), **BOSILJČIĆ** (Iliđža), **BRĐANIN**, **GRAHOVAC**, **KASAGIĆ**, **KUPREŠANIN** (Banja Luka), **BUHA**, **MAKSIMOVIĆ**, **TRBOJEVIĆ** (Sarajevo), **ČANČAR** (Foča), **BALABIĆ** (Ključ), **Dragoljub MIČIĆ**, **NOVAKOVIĆ** (Bijeljina), **Jovo MIJATOVIĆ** (Zvornik), **Dragan MILANOVIĆ** (Bosanski Petrovac), **RAŠULA** (Sanski Most), **Marko SIMIĆ** (Sokolac), **SRDIĆ** (Prijeđor), **VESELINOVIĆ** (Pale), **VOJINOVIĆ** (Brčko), **SAVKIĆ** (Milići).

¹⁷⁹² P1357.

¹⁷⁹³ P1479,pp.131-156.

¹⁷⁹⁴ AF2247; P6185; C.SIMIĆ:D3133,para.32; P6211,p.8; I.OSMANOVIĆ:P3212,para.16; AF2248; AF2236.

¹⁷⁹⁵ J.IVANOVIĆ:T.39897.

¹⁷⁹⁶ [REDACTED]

¹⁷⁹⁷ [REDACTED]

¹⁷⁹⁸ See Foča Summary.

republic-level as he did so,¹⁷⁹⁹ before visiting Pale, Sarajevo, Banja Luka, Bijeljina and other towns in the newly formed RS.¹⁸⁰⁰ Minutes from RS Government meetings held on 1 and 2 June 1992 state that the "reports from the official visits to [Foča], SAO Semberija, Majeвица, and AP Krajina have been accepted".¹⁸⁰¹

496. Municipal representatives also came to see **KARADŽIĆ** and **KRAJIŠNIK** in 1992, including frequent visits from Vogošća, Ilidža and Banja Luka.¹⁸⁰²

(viii) War Commissioners

497. War Commissioners were another communications link between the republic authorities and the municipalities. In April 1992, Crisis Staffs were instructed to "notify and consult the competent authorities in Serbian [BiH], i.e. commissioners of the Government".¹⁸⁰³ The later Presidential Decisions on War Presidencies and War Commissions instructed Commissioners to "convey information about the problems, needs and work of the municipal bodies"¹⁸⁰⁴ and "ensure permanent coordination and implementation of the policies and measures that are established and adopted by the republican state organs and the [VRS-GŠ]".¹⁸⁰⁵ In the words of one such Commissioner, War Commissions were formed "to be the point of contact between the RS War Presidency and RS government and the local authorities",¹⁸⁰⁶ "to interpret some decisions of the government and the Presidency, to point out shortcomings on the ground, and suggest solutions".¹⁸⁰⁷ War Commissions were established pursuant to **KARADŽIĆ**'s order in municipalities including Foča,¹⁸⁰⁸ Bratunac,¹⁸⁰⁹ Vlasenica,¹⁸¹⁰ Vogošća¹⁸¹¹ and Zvornik.¹⁸¹² **KRAJIŠNIK**, the Presidency member

¹⁷⁹⁹ P4986.

¹⁸⁰⁰ P6265,p.6. *See also* P956,p.27.

¹⁸⁰¹ D415,p.4.

¹⁸⁰² B.ĐERIĆ:P4982,para.41.

¹⁸⁰³ P2717.

¹⁸⁰⁴ P2611.

¹⁸⁰⁵ P2607.

¹⁸⁰⁶ N.POPLAŠEN:D4027,para.7.

¹⁸⁰⁷ N.POPLAŠEN:T.43585. *See also* M.KRAJIŠNIK:T.43338-43339.

¹⁸⁰⁸ P3339; P6266.

¹⁸⁰⁹ P5491.

¹⁸¹⁰ P5486.

¹⁸¹¹ N.POPLAŠEN:T.43585; N.POPLAŠEN:D4027,para.7.

¹⁸¹² P5479.

responsible for the work of the War Commissioners,¹⁸¹³ said that the use of Commissioners was "very efficient and good."¹⁸¹⁴

(ix) Communications via SDS representatives

498. The Assembly was a key means of communication between the leadership and the field.¹⁸¹⁵ Bosanska Krupa official Gojko KLIČKOVIĆ¹⁸¹⁶ acknowledged to **KARADŽIĆ** that when there were bad telecommunications, "we could only communicate with you at Pale through the delegates and the club of representatives of the [SDS], which you favoured."¹⁸¹⁷

499. As noted above, the Assembly was used by deputies to report on events on the ground,¹⁸¹⁸ including expulsions¹⁸¹⁹ and detentions¹⁸²⁰ of non-Serbs. Brčko CS member Đorđe RISTANIĆ confirmed that, from its inception, the Brčko War Presidency would directly contact the Presidency or the government,¹⁸²¹ and that instructions arrived through Assembly deputy and SDS Brčko President VOJINOVIĆ.¹⁸²² Banja Luka major Predrag RADIĆ confirmed that Assembly deputies would convey decisions from Pale which were followed by the ARK and municipal authorities, and deputies would likewise report back to Pale on the implementation of directives in the ARK municipalities.¹⁸²³ As discussed above, CS members from Prijedor¹⁸²⁴ and Ključ¹⁸²⁵ reported back to their municipalities on the 16th Assembly Session.

500. Deputies would also receive and send republic-level information by communicating amongst themselves and ultimately with the BSL. MILINČIĆ testified in relation to ARK municipality presidents that "[w]e met often, we communicated. If somebody did not attend a Main Board meeting for any reason, then

¹⁸¹³ D440,p.3.

¹⁸¹⁴ P1105,p.102.

¹⁸¹⁵ See III.C.8.(f): Assembly.

¹⁸¹⁶ G.KLIČKOVIĆ:T.46916.

¹⁸¹⁷ G.KLIČKOVIĆ:T.46840.

¹⁸¹⁸ See e.g. P956,pp.12-13,15-16,20,24-27,44; D92,pp.30-31,47,60,66-67,72-74,83.

¹⁸¹⁹ D92,p.66.

¹⁸²⁰ D92,p.32.

¹⁸²¹ D.RISTANIĆ:P3023,para.29.

¹⁸²² D.RISTANIĆ:P3023,paras.13-14.

¹⁸²³ P.RADIĆ:P1,pp.85-87.

¹⁸²⁴ P6589; S.MIŠKOVIĆ:T.45381-45383.

¹⁸²⁵ P3439,p.2.

those who did go would convey what happened there."¹⁸²⁶ Zvornik municipal officials sent information to **KARADŽIĆ** and **KRAJIŠNIK** about what was happening in Zvornik through Deputies Branko **SIMIĆ** and Dragan **MIĆIĆ**.¹⁸²⁷

(x) **KARADŽIĆ's personal access to information**

501. In addition to the communications systems discussed above, **KARADŽIĆ** had 24/7 access to communication in his residences and offices, including a telephone, radio and secure military line.¹⁸²⁸ In case of power cuts, each location had a generator to ensure that he was able to stay in touch.¹⁸²⁹

502. **KARADŽIĆ** and other BSL members were also able to receive communication even while they were away from Pale, pursuant to an agreement between the MUP and the RCC. At any time, **KARADŽIĆ** could call the RCC and he would be connected to the person to whom he wished to speak.¹⁸³⁰

503. Helicopters were available to transport **KARADŽIĆ** and the BSL from the beginning of the war: on 18 April Čedo **KLJAJIĆ** stated that helicopters were flying back and forth between Pale and Belgrade "daily" and "operating constantly".¹⁸³¹

(b) **KARADŽIĆ and the BSL had effective communications**

504. In light of the above, the repeated Defence assertion that there was a lack of communications between the republican leadership and the municipalities for several months from April 1992¹⁸³² does not stand up to scrutiny. CSs reported to republic-level organs following the takeovers.¹⁸³³ For example, Sokolac CS President **TUPAJIĆ** reported directly to **KARADŽIĆ** on mobilisation and establishing united

¹⁸²⁶ M.MILINČIĆ:T.44955.

¹⁸²⁷ KW317:T.39374.

¹⁸²⁸ R.VUKOVIĆ:P2794,paras.14-26.

¹⁸²⁹ N.RISTIĆ:T.15381.

¹⁸³⁰ R.VUKOVIĆ:P2794,para.65. *See also* H.OKUN:P776,p.82.

¹⁸³¹ P2227,p.2; Č.KLJAJIĆ:T.42202-42204.

¹⁸³² *See e.g.* M.KRAJIŠNIK:T.43315; **ARK**:R.BRĐANIN:D4034,para.9; N.ERCEG:D4086,para.29;

M.SAJIĆ:D4114,para.12; KW426:D4300,para.3; **Bratunac**:R.ĐUKANOVIĆ:D3194,para.51;

Hadžići:M.TOLJ:D3063,para.18; **Sanski Most**:M.ORLOVIĆ:D4294,para.27;

Prijedor:B.MANDIĆ:D4229,para.22; **Zvornik**: [REDACTED];

Foča:S.AVLJIJAŠ:D3105,paras.33,35,60.

¹⁸³³ D.HANSON:P2589,para.63; D.HANSON:T.14556-14562. *See e.g.* P2627,p.1; P3080;

Bijeljina:P2626; D1585; **Vogošća**:P2359; **Sanski Most**:P3399; P2806; **Novo Sarajevo**:P5957;

P2908,p.1; **Foča**:P3476,p.3.

command in the municipality.¹⁸³⁴ Moreover, many Defence witnesses affirmed that there were communications during the relevant period.¹⁸³⁵ For example, **KARADŽIĆ** called **MILINČIĆ** in Srbac immediately after a Croatian shelling of the municipality in June 1992.¹⁸³⁶

505. Moreover, the Defence argument that municipalities were like isolated para-state bodies or mini-states for the first months of the war¹⁸³⁷ is untenable in view of their consistent conduct toward non-Serbs, in particular the persecutions, detentions and expulsions which were carried out in a similar manner across the RS. The mass detention and expulsion of thousands of Bosnian Muslims and Bosnian Croats throughout the RS required a substantial logistical undertaking, the scale of which required extensive co-ordination at all levels of RS military and civilian authorities. In one example, the expulsion of the Bratunac 400 involved the government Exchange Commission listing the prisoners on behalf of the MUP,¹⁸³⁸ the Prime Minister arranging for the Sokolac CS to provide trucks to the Pale CS¹⁸³⁹ and the government Secretary arranging for the Ilijaš CS to provide passage for the prisoners from Pale to Visoko.¹⁸⁴⁰

506. Defence contentions that the ARK was "[cut] off" until the corridor breakthrough in late June¹⁸⁴¹ do not stand up to scrutiny. For example, both ERCEG, who claimed a "total breakdown of [...] all forms of communication",¹⁸⁴² and SAJIĆ, who asserted "[t]here were no links with Pale",¹⁸⁴³ admitted personally receiving Republic-level orders during this time.¹⁸⁴⁴ As RCC Chief Rade VUKOVIĆ explained, while there were often problems connecting immediately with Banja Luka, "we found

¹⁸³⁴ P6236.

¹⁸³⁵ See e.g. Z.ČVORO:T.30928-30930; S.STANIĆ:D2678,para.8; S.BUDIMIR:D4463,p.268; R.DUKANOVIĆ:T.36190-36192.

¹⁸³⁶ M.MILINČIĆ:T.45005-45006; M.MILINČIĆ:D4188,para.16.

¹⁸³⁷ See e.g. M.KRAJIŠNIK:T.43315; T.KOMAD:D3198,para.20;

ARK:A.GRAHOVAC:D4077,para.26; N.KONDIĆ:D4063,para.16; N.ERCEG:D4086,para.85; M.SAJIĆ:D4114,para.55; **Hadžići**:R.PANDUREVIĆ:D2490,para.61; **Ključ**:S.JURIŠIĆ:T.47062; **Zvornik**:J.IVANOVIĆ:D3692,para.25; J.IVANOVIĆ:T.39897-39898.

¹⁸³⁸ P3208(B/C/S).

¹⁸³⁹ P4983; P2619.

¹⁸⁴⁰ P1604. See B.ĐERIĆ:P4982,para.34.

¹⁸⁴¹ See e.g. KW426:D4300,para.3.

¹⁸⁴² N.ERCEG:D4086,para.29.

¹⁸⁴³ M.SAJIĆ:D4114,para.12.

¹⁸⁴⁴ N.ERCEG:T.44079-44083. See also P6531; M.SAJIĆ:D4114,paras.18-19. See also M.SAJIĆ:T.44131.

a way to get through to them",¹⁸⁴⁵ including via the VRS-GŠ.¹⁸⁴⁶ Moreover, ARK authorities could travel by helicopter¹⁸⁴⁷ and Banja Luka representatives made frequent visits to **KARADŽIĆ** in 1992.¹⁸⁴⁸

507. Specifically, there was a clear line of communication between the ARK and Pale in the crucial period of April-June 1992, prior to the corridor being opened.¹⁸⁴⁹ While phone lines had been down at the beginning of the conflict, during this time the Banja Luka regional communications centre was operational, with its chief stating on 9 May 1992 that it had "phone lines, teleprinting lines, telefax, radio and radio links for the needs of Banja Luka Municipality and the entire region".¹⁸⁵⁰ As discussed above, both the 16 April 1992 MOD TO mobilisation order and the 20 May 1992 Presidency general mobilisation order were received and implemented at ARK and municipal level.¹⁸⁵¹ ARK implementation of republic-level orders continued in June 1992, with, for example, the implementation of a 5 June RS Government order by the ARK Presidency just one day later.¹⁸⁵²

508. Multiple MUP documents evidence frequent communications between police in the ARK municipalities and the MUP during April-June 1992.¹⁸⁵³ A MUP report on the period April-June 1992 affirms that while communication was difficult at times, the MUP headquarters maintained contact with CSBs including Banja Luka during this period.¹⁸⁵⁴ CSB Banja Luka was in direct contact with its subordinate SJBs throughout this period.¹⁸⁵⁵ [REDACTED]

¹⁸⁴⁵ R.VUKOVIĆ:P2794,paras.66-67.

¹⁸⁴⁶ R.VUKOVIĆ:P2794,para.67. *See also* N.ERCEG:T.44085.

¹⁸⁴⁷ M.SAJIĆ:D4114,para.47; M.SAJIĆ:T.44132.

¹⁸⁴⁸ B.ĐERIĆ:P4982,para.41.

¹⁸⁴⁹ *See e.g.* P2804,pp.2-3; R.VUKOVIĆ:P2794,para.45; P2807; P2821; M.SAJIĆ:T.44131; R.VUKOVIĆ:P2794,para.72,p.31; M.MILINČIĆ:T.45005-45006; P2746; P2758; P2747; P2787; P2806; P5453; P2750; P2805; P2752; P3662; P956; P1355; P1478,pp.53-60; P4987; P3084.

¹⁸⁵⁰ P2805.

¹⁸⁵¹ *See* Brief,paras.300,314.

¹⁸⁵² P2824,p.4, implemented by P6532; N.ERCEG:T.44083-44085.

¹⁸⁵³ *See e.g.* P2748, 22/23 April 1992; P2749, 25 April 1992; P2751, 10 May 1992; P2791, 15 May 1992; P2792, 16 May 1992; P2762, 18 May 1992; P2753, 22 May 1992; P2754, 23 May 1992; P2755, 27 May 1992; P2756, 25 May 1992; P2750 showing dispatches sent to Banja Luka on 22,23,26,27 April and 4,8,10,11 May, sometimes multiple dispatches per day; P2231,p.5; P2759;

D.KEZUNOVIĆ:P2743,para.20.

¹⁸⁵⁴ P2760,p.8; D.KEZUNOVIĆ:P2743,para.21.

¹⁸⁵⁵ *See e.g.* P2744; D.JANKOVIĆ:T.47340-47341; [REDACTED].

[REDACTED]

[REDACTED]

509. Equally, multiple VRS documents confirm communications links between Banja Luka and the republican authorities during this period.¹⁸⁵⁷ On 1 June, for example, the IKK reported "about 7,000" prisoners in Prijedor in two separate combat reports to the VRS-GŠ.¹⁸⁵⁸

¹⁸⁵⁶ [REDACTED]

¹⁸⁵⁷ See e.g. P3317, 29 May 1992; P5441, 31 May 1992; P5469, 9 June 1992; D1809, 10 June 1992; P5395, 14 June 1992; P3664, 14 June 1992; P2807, 17 June 1992; P5509, 1 July 1992.

¹⁸⁵⁸ P5398,p.1, 1 June 1992; P5407, 1 June 1992.

D. **KARADŽIĆ** shared the intent for the crimes

510. As discussed above,¹⁸⁵⁹ **KARADŽIĆ** was central to the formulation and implementation of a common criminal purpose encompassing the crimes in Counts 1, 3-8.¹⁸⁶⁰ He and other JCE members sought an ethnically-homogeneous Serb state encompassing territories inhabited by tens of thousands of non-Serbs; they knew that force would be required to achieve these territorial and demographic goals. At the same time, **KARADŽIĆ** led Bosnian Serb efforts to establish organs later used to implement this forcible demographic transformation. **KARADŽIĆ** then commanded and directed these organs as they implemented the common purpose, praised the successful implementation of the common purpose and worked to cement the demographic transformation achieved. A finding that **KARADŽIĆ** shared direct intent for the crimes encompassed by the common purpose is the inevitable conclusion to be drawn from his acts and conduct in furtherance of that purpose.¹⁸⁶¹

511. **KARADŽIĆ**'s response to the flood of information he received of crimes falling within the common purpose are further reflections of his intent for those crimes. He knew of the extent and nature of the crimes being committed by organs under his authority and control, and continued to support their actions. **KARADŽIĆ** consistently failed to take measures genuinely aimed at preventing or punishing those crimes, and rewarded perpetrators, thus creating an environment of impunity which both enabled and encouraged their commission.

1. **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose

512. [REDACTED] **KARADŽIĆ** was notified of crimes committed against non-Serbs in the municipalities by his forces and those collaborating with them. His information came from international observers and

¹⁸⁵⁹ See III.B: **KARADŽIĆ** shared the common purpose of a JCE to permanently and forcibly remove Bosnian Muslims and Croats from Bosnian Serb-claimed territories.

¹⁸⁶⁰ See III.B.4: Crimes were an essential part of the achievement of the common purpose.

¹⁸⁶¹ **KARADŽIĆ**'s specific intent for genocide under Count 1 is discussed below. See III.E: Genocide.

¹⁸⁶² [REDACTED]

agencies,¹⁸⁶³ as well as his own subordinates at the republic, regional and municipal levels.¹⁸⁶⁴ The BSL were also kept well-informed through print and broadcast media,¹⁸⁶⁵ and the issue of ethnic cleansing was directly raised with **KARADŽIĆ** in press interviews.¹⁸⁶⁶ [REDACTED]

513. In the space of just a few days in early April, **KARADŽIĆ** was personally informed by two international observers of the events in Zvornik. Journalist Martin BELL was present in Zvornik on 8 and 10 April and saw "Arkan's Tigers [...] providing the firepower for the eviction of Muslims from Zvornik";¹⁸⁶⁸ he encountered a column of around 20,000 fleeing Muslims who pleaded for help.¹⁸⁶⁹ Upon his return to Sarajevo, he urged Colm DOYLE to inform **KARADŽIĆ** of the number of refugees fleeing Zvornik, which he did.¹⁸⁷⁰ [REDACTED]

¹⁸⁶³ Specific examples are discussed below. *See also* H.OKUN:P776,pp.50-52;

J.WILSON:P1029,paras.101-102,104,113-115; [REDACTED];

B.ĐERIĆ:T.27949-27950.

¹⁸⁶⁴ *See* III.C.8.(a).(ii): **KARADŽIĆ**'s authority over the SDS; III.C.8.(h).(vi): **KARADŽIĆ**'s authority and control over the RSMUP; III.C.8.(i).(iii).d: Situational awareness; III.C.8.(f): Assembly; III.C.9: **KARADŽIĆ** had a comprehensive communications network.

¹⁸⁶⁵ [REDACTED]; V.OSTOJIĆ:D2361,pp.86,87,97; H.OKUN:P776,p.228;

¹⁸⁶⁶ *See e.g.* J.BOWEN:T.10095-10096.

¹⁸⁶⁷ [REDACTED] *See further*

¹⁸⁶⁸ M.BELL:P1996,para.24.

¹⁸⁶⁹ P2002; M.BELL:T.9782-9785; M.BELL:P1996,para.24.

¹⁸⁷⁰ M.BELL:P1996,para.25; M.BELL:T.9787; C.DOYLE:P918,pp.28-29; C.DOYLE:T.2911,2933.

¹⁸⁷¹ [REDACTED]

¹⁸⁷² [REDACTED]

¹⁸⁷³ [REDACTED]

[REDACTED]

514. As Serb Forces continued to commit crimes in furtherance of the common purpose throughout the summer of 1992, it was "repeatedly"¹⁸⁷⁵ addressed in meetings with and reports prepared by international observers and negotiators. For example, in early June, WILSON confronted PLAVŠIĆ, in **KARADŽIĆ**'s presence, with allegations of "large-scale detention of civilians" that had appeared in the press.¹⁸⁷⁶ PLAVŠIĆ acknowledged the camps and claimed they were only for "people of military age."¹⁸⁷⁷ [REDACTED]

[REDACTED]

[REDACTED]

515. By 24 May, reports of crimes against non-Serbs were so widespread in the international media that ĐERIĆ felt compelled to write to US Secretary of State James BAKER falsely claiming the Serbs were "holding no hostages, operating no concentration camps and [...] not killing unarmed civilians".¹⁸⁸⁰

516. While **KARADŽIĆ** rejected reports of ethnic cleansing in public,¹⁸⁸¹ in meetings with international observers he "almost never" denied what was occurring.¹⁸⁸² Rather, he attempted to deflect media and international observers' concerns from the suffering of Muslims and Croats with assertions of crimes committed against Serbs.¹⁸⁸³

517. For example, in a 25 August 1992 letter to the London Peace Conference participants **KARADŽIĆ** noted the "great deal of concern over what has become known as 'ethnic cleansing,'" admitting that "[t]he majority of those displaced are

¹⁸⁷⁴ [REDACTED]
¹⁸⁷⁵ H.OKUN:P776,p.50.
¹⁸⁷⁶ J.WILSON:P1029,paras.84-90.
¹⁸⁷⁷ J.WILSON:P1029,paras.101-102.
¹⁸⁷⁸ [REDACTED], *See also* Bosanski Novi Summary.
¹⁸⁷⁹ [REDACTED].
¹⁸⁸⁰ P1094. *See also* [REDACTED].

¹⁸⁸¹ *See e.g.* P3778; P3698; P809,p.10; P3030; P2072.

¹⁸⁸² H.OKUN:T.1505-1506. *See also* H.OKUN:P776,pp.50-51; J.WILSON:T.3995; J.WILSON:P1029,para.122.

undoubtedly Bosnian-Muslims".¹⁸⁸⁴ While **KARADŽIĆ** claimed to the international audience that this "so-called practice of ethnic cleansing has been an issue of prime concern to me",¹⁸⁸⁵ his own Government had systematized ethnic cleansing by way of the Exchange Commission.¹⁸⁸⁶

518. **KARADŽIĆ** also acknowledged to his own followers the destructive impact resulting from the campaign of violence targeting Bosnian Muslims, while revealing his true sentiments regarding that campaign. In late July, after tens of thousands of non-Serbs had been killed, expelled or detained in sub-human conditions, **KARADŽIĆ** explained to the Assembly that there was "truth" in the statement that "this conflict was roused in order to eliminate the Muslims", declaring "they think that they are being nationally established, but in fact they are vanishing."¹⁸⁸⁷

519. The crimes—and protests—continued into the autumn of 1992. The issue of ethnic cleansing was at the forefront of meetings between **KARADŽIĆ**, other members of the BSL and international representatives in mid-September.¹⁸⁸⁸ By the time **KARADŽIĆ** accompanied Lord OWEN and Secretary VANCE to Banja Luka to convince them ethnic cleansing was not occurring, "it had become clear what had been happening, because people had come out and had spoken of it, and it had been reported [...] the fact of ethnic cleansing was, even at that point, being treated as something that was incontrovertible".¹⁸⁸⁹

520. On 1 October, UNPROFOR Commander Major-General MORILLON informed **KARADŽIĆ** he had received "dismaying news that your forces have proceeded with the forced expulsion of nearly three hundred persons from GRBAVICA".¹⁸⁹⁰ General ABDEL-RAZEK also raised this expulsion with PLAVŠIĆ, who promised to look into the matter, but without result.¹⁸⁹¹

¹⁸⁸³ See e.g. H.OKUN:P776,pp.50-51,59,62,111-112; H.OKUN:T.1505-1506,1508-1510; P785,p.24; P786,p.17; P809,pp.1-2; P790,pp.9,15,37; J.BOWEN:P2068,paras.70-71; J.BOWEN:T.10142-10144; P2084; [REDACTED]. See also T.17861.

¹⁸⁸⁴ D4720. See also C.DOYLE:P918,pp.61-62; C.DOYLE:T.2675-2676.

¹⁸⁸⁵ D4720.

¹⁸⁸⁶ See III.C.8.(c): Exchange Commission.

¹⁸⁸⁷ D92,p.86.

¹⁸⁸⁸ H.OKUN:P776,pp.250,256. See also P939,p.4; P1105,p.112.

¹⁸⁸⁹ J.BOWEN:T.10096-10098; P2072.

¹⁸⁹⁰ P5419.

¹⁸⁹¹ H.ABDEL-RAZEK:T.5521.

521. Throughout 1992, **KARADŽIĆ** and the BSL also received reports from their associates and subordinates regarding the forcible removal of non-Serbs from Bosnian Serb-claimed territories. As discussed above, **KARADŽIĆ** was in near constant contact with his military and civilian subordinates through his comprehensive communications network.¹⁸⁹² Reports to **KARADŽIĆ** throughout the summer of 1992 on the expulsion of Muslims from municipalities including Bosanska Krupa, Ilidža and Zvornik are also discussed above.¹⁸⁹³ In other examples of reporting of crimes to **KARADŽIĆ** and the BSL:

- On 6 May, General MANDARIĆ told MLADIĆ that SDS representatives DERONJIĆ and ĐUKANOVIĆ "are killing all Muslims by slitting their throats" in Bratunac and two detachments of the Bratunac TO "brought in all the cutthroats from Vukovar, and killed everyone they laid their hands on", proposing that **KARADŽIĆ** "appease them".¹⁸⁹⁴
- On 2 June, MANDIĆ informed Ilidža CS President PRSTOJEVIĆ: "It has come to our attention and that of the Government that you are issuing ultimatums to some Turks; evicting people from certain settlements", which was causing "very bad publicity for us".¹⁸⁹⁵ It had also "already reached the top" that in one settlement PRSTOJEVIĆ had given the inhabitants "24 hours to move out".¹⁸⁹⁶ That MANDIĆ was concerned about the negative publicity rather than the crimes themselves is evidenced not only by the very terms of his warning, but also by the fact that PRSTOJEVIĆ proudly took credit for these expulsions at the Assembly.¹⁸⁹⁷
- On 7 July, President of the Pale CS Zdravko ČVORO complained to the Presidency and personally to PLAVŠIĆ that there had been "forced and wilful moving out of the Muslim population, which created a series of other problems" including "a large number of illegal and criminal actions".¹⁸⁹⁸

¹⁸⁹² See III.C.9: **KARADŽIĆ** had a comprehensive communications network.

¹⁸⁹³ See III.B.4.(b): **KARADŽIĆ**'s response to the crime evidences the common criminal purpose.

¹⁸⁹⁴ P1477,p.253.

¹⁸⁹⁵ P1110,p.3.

¹⁸⁹⁶ P1110,p.4.

¹⁸⁹⁷ D92,p.66.

¹⁸⁹⁸ P6034.

- At the 24-26 July Assembly, in addition to PRSTOJEVIĆ reporting "driving the Muslims out" of territories where they had been a majority,¹⁸⁹⁹ another deputy noted the problem of "hundreds and thousands" of captured people of other nationalities,¹⁹⁰⁰ and a third acknowledged that "all Muslim judges from Vlasenica, Bratunac and Zvornik" had been "expelled" and expressed hope that the number of Muslims in Birač "has at least been halved."¹⁹⁰¹
- In late July, President of the ARK Assembly KUPREŠANIN informed KRAJIŠNIK and PLAVŠIĆ¹⁹⁰² of the VRS mass killing of unarmed Croats in Briševo village in Prijedor.¹⁹⁰³

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Serb military and civilian authorities from the local to republic level were informed of the 21 August 1992 massacre at Korićanske Stijene¹⁹⁰⁶—including the Prijedor police intervention platoon's involvement—almost immediately.¹⁹⁰⁷ By the morning of 23 August, news of the killings reached **KARADŽIĆ** in London.¹⁹⁰⁸ The massacre was so notorious that, as one Defence witness put it, "[t]he entire RS" knew who was responsible.¹⁹⁰⁹
- At a 15 November SRK meeting at Lukavica barracks, attended by MLADIĆ, TOLIMIR, GALIĆ, other senior SRK and VRS-GŠ leaders, it was noted that

¹⁸⁹⁹ D92,p.66.

¹⁹⁰⁰ D92,p.32.

¹⁹⁰¹ D92,pp.72,73.

¹⁹⁰² V.KUPREŠANIN:T.43532-43535; P6510,pp.17-18.

¹⁹⁰³ See SIC:A.10.9(Prijedor); V.KUPREŠANIN:T.43531-43532,43575.

¹⁹⁰⁴ KW317:T.39367-39368,39370-39374; [REDACTED].

¹⁹⁰⁵ [REDACTED].

¹⁹⁰⁶ See SIC:B.15.6(Prijedor).

¹⁹⁰⁷ D2040; D2041,p.2; P5446; M.STAKIĆ:D4195,para.30; N.KREJIĆ:P3760,pp.10-14,18-27,40-41;

N.KREJIĆ:T.20857-20861; M.KOMLJENOVIC:P3768,paras.4,12,14,16; V.GLAMOČIĆ:T.47243-47244; J.JANKOVIĆ:D4235,para.9; D.JANKOVIĆ:T.47303-47304,47345-47348;

[REDACTED]; [REDACTED];

D.JANKOVIĆ:T.47302-47303,47343-47344; N.KREJIĆ:P3760,pp.10,12-13.

¹⁹⁰⁸ V.GLAMOČIĆ:T.47234-47235; V.GLAMOČIĆ:D4379,paras.14-17;

B.SUBOTIĆ:D3695,paras.243,246; M.KOMLJENOVIC:P3768,para.5; M.KOMLJENOVIC:T.20927.

one of the main "[f]laws" of the campaign in Novo Sarajevo was the "[g]enocide on other nations" and the "[e]xtremely widespread theft, robbery, violent, and other crimes"¹⁹¹⁰ including "unnecessary mistreatment and killing of members of other ethnicities, especially Muslims".¹⁹¹¹ Novo Sarajevo Municipality President PRIJIĆ also commented that "[a] great portion of soldiers [are] exercising unruly behavior" such as "[m]ass removals of property from the municipality, rape, expulsions from flats" and that the crimes "are going unpunished".¹⁹¹²

522. Throughout the summer of 1992, **KARADŽIĆ** also received a steady stream of information that forces under his command and those with whom they collaborated were unlawfully detaining thousands of non-Serb civilians in dire conditions in camps across the RS. Following the Exchange Commission's creation on 8 May, **KARADŽIĆ** and the BSL were kept apprised of its work,¹⁹¹³ and informed "on a daily basis" about the inhumane treatment to which non-Serb civilians were subjected in detention facilities and camps.¹⁹¹⁴ The BSL could witness this inhumane treatment itself when, in mid-May 1992, televised images of the Bratunac 400 arriving in Visoko depicted the extreme abuse detainees were suffering at the hands of the Bosnian Serbs.¹⁹¹⁵ Around the same time, as noted above, ĐERIĆ falsely denied media reports that Serbs were holding hostages, operating concentration camps and killing unarmed civilians.¹⁹¹⁶

523. At a Presidency session on 10 June, the Government reported—based on media and information it received from the front¹⁹¹⁷—"bad news"¹⁹¹⁸ of "certain instances of the inhuman treatment of detained persons".¹⁹¹⁹ The Presidency ordered ĐERIĆ to "submit a report on prisoners, with proposed measures",¹⁹²⁰ a task it

¹⁹⁰⁹ S.AVLJIJAŠ:T.35187-35188.

¹⁹¹⁰ P5065,pp.3-4,9.

¹⁹¹¹ P5065,pp.3,9.

¹⁹¹² P5065,p.12.

¹⁹¹³ P1091,pp.1-2; P1092,p.3; P1095,p.4; M.MANDIĆ:T.4567.

¹⁹¹⁴ M.MANDIĆ:C2,p.278. *See also* P2334,pp.1-2.

¹⁹¹⁵ *See* P3206. [REDACTED]

¹⁹¹⁶ P1094.

¹⁹¹⁷ P1093,p.2; M.MANDIĆ:T.4559.

¹⁹¹⁸ M.MANDIĆ:T.4568-4569.

¹⁹¹⁹ M.MANDIĆ:T.4556.

¹⁹²⁰ P1093,p.2.

assigned to the MOJ (MANDIĆ) the same day.¹⁹²¹ After receiving the report five days later, Government members discussed what they referred to as "the prisoner exchange problem"¹⁹²² stating that the issue was "complex and delicate" and acknowledging that the problem had an international dimension and could cause "a number of negative consequences for the whole Republic".¹⁹²³ SUBOTIĆ admitted that this "delicate" issue was the detention of Muslim civilians.¹⁹²⁴ The report was found sufficiently alarming to justify the appointment of a "working group" charged with urgently proposing "regulations and concrete measures for solving of this issue".¹⁹²⁵

524. At the same time, it was clear to outside observers that this network of formal and "unrecognized" prisons jammed with civilians was a part of the "policy of ethnic cleansing".¹⁹²⁶

525. Nonetheless, the BSL took no steps to remedy these problems, even as fresh evidence rolled in. On 25 June, STANIĆ informed MLADIĆ that "[o]ver 800 prisoners, 200 of whom are women and children" were being detained in Vlasenica.¹⁹²⁷ A 17 July MUP report from STANIŠIĆ sent to **KARADŽIĆ** personally stated that the VRS, CSs and War Presidencies "have requested that the Army round up or capture as many Muslim civilians as possible" and that they were leaving "such undefined camps to internal affairs organs". The report further noted that "[t]he conditions in some of these camps are poor: there is no food, individuals sometimes do not observe international norms, etc".¹⁹²⁸

526. On 22 July, the question of the "unlawful treatment of war prisoners" was discussed at a Government session.¹⁹²⁹ On 24 July, ARK representative MILANOVIĆ reported to Assembly attendees, including **KARADŽIĆ**,¹⁹³⁰ the "huge problem" with captured people of other nationalities: "we have hundreds and thousands of these prisoners".¹⁹³¹ On 28 July, the Government asked the MOJ to "prepare a Report on the

¹⁹²¹ P1092,p.3.

¹⁹²² P1091; P3091,p.5; P1095.

¹⁹²³ P1095; P1110.

¹⁹²⁴ B.SUBOTIĆ:T.40117-40118.

¹⁹²⁵ P1095.

¹⁹²⁶ P1265,paras.33-34. *See also* H.OKUN:P776,pp.49,255-256.

¹⁹²⁷ P1478,p.232.

¹⁹²⁸ P1096,p.3; M.MANDIĆ:T.4571-4572. *See also* D447,p.7; Č.KLJAJIĆ:T.42215; P1097.

¹⁹²⁹ D430,pp.6,7.

¹⁹³⁰ D92,p.10.

¹⁹³¹ D92,p.32.

state of penal correctional facilities and concentration centres for prisoners, focusing on living conditions".¹⁹³²

527. Between 14 and 16 July, the ICRC was given access "reluctantly" to the Manjača camp.¹⁹³³ A few days later, on 25 July, it reported to **KARADŽIĆ** the Manjača visit was "terminated prematurely [...] when delegates observed that two detainees had been subjected to ill treatment during the visit".¹⁹³⁴ The report also cited evidence of "recent and often severe beatings" of the prisoners and detainees showing "marked weight loss and signs of anaemia", and described the general living conditions as "absolutely insufficient".¹⁹³⁵ **KARADŽIĆ** was informed that a number of detainees suffered from tuberculosis, chronic physical or mental illnesses, war wounds or disabilities, none of whom were receiving sufficient treatment.¹⁹³⁶

528. In late July, **KARADŽIĆ**—well aware that organs under his control had detained massive numbers of non-Serb civilians¹⁹³⁷—falsely denied that the Bosnian Serbs "have organised concentration camps or that we hold civilian prisoners", challenging British journalists to view the camps for themselves.¹⁹³⁸ Ed VULLIAMY from the *Guardian* and ITN journalists traveled immediately to Belgrade, where they were met by Serbian and Bosnian Serb officials, including KOLJEVIĆ.¹⁹³⁹ In preparation for the media visit, **KARADŽIĆ** and others among the BSL strove to conceal the dire conditions in camps that they had known of since at least June. On 3 August—as the journalists were flown to Pale and met by **KARADŽIĆ**¹⁹⁴⁰—MLADIĆ was ordering that the camps be "prepare[d] [...] for visits" by foreign journalists and the ICRC,¹⁹⁴¹ and the 1KK was ordering the commanders of the camps at "Manjača, Trnopolje, Omarska and Prijedor" to "make conditions in these camps satisfactory".¹⁹⁴² Despite these clean-up efforts and despite being refused access to most of Omarska and Trnopolje, when the journalists were finally permitted to visit

¹⁹³² P3098,p.10.

¹⁹³³ P3758,p.5.

¹⁹³⁴ P3758,p.5.

¹⁹³⁵ P3758,pp.5-6.

¹⁹³⁶ P3758,pp.6-7.

¹⁹³⁷ See e.g. P1096,p.3

¹⁹³⁸ E.VULLIAMY:P3777,pp.6-7; E.VULLIAMY:T.21037-21038; P3778.

¹⁹³⁹ E.VULLIAMY:P3777,pp.7-10; E.VULLIAMY:T.21038.

¹⁹⁴⁰ E.VULLIAMY:P3777,pp.10-11; E.VULLIAMY:T.21038-21041; P3784.

¹⁹⁴¹ P5461.

¹⁹⁴² P5460.

on 5 August, they gathered information clearly indicating that non-Serbs were detained in inhumane conditions and suffered physical abuse.¹⁹⁴³

529. In the immediate aftermath of VULLIAMY and ITN's reports, **KARADŽIĆ** agreed on air to accompany journalists and ICRC representatives to Omarska to ensure they gained full access to the camp.¹⁹⁴⁴ The military and police then hurriedly further cleaned up the camp, and transferred the majority of the detainees out of Omarska¹⁹⁴⁵ in anticipation of the "media circus" that was about to descend.¹⁹⁴⁶ **KARADŽIĆ** was overheard discussing the need to provide beds and soap to prisoners urgently with KUPREŠANIN,¹⁹⁴⁷ and KUPREŠANIN took an SDA functionary from Omarska on **KARADŽIĆ**'s instructions and sought to "fatten [him] up" so that he would appear better in staged public appearances¹⁹⁴⁸ and at a planned meeting with VANCE and OWEN in Banja Luka.¹⁹⁴⁹ By 7 August, only 179 detainees remained at Omarska for "show",¹⁹⁵⁰ where they suddenly received new beds and two meals per day.¹⁹⁵¹

530. The international media exposure created a sense of urgency among the BSL, as revealed by RS Presidency sessions attended by **KARADŽIĆ** on 5,¹⁹⁵² 6¹⁹⁵³ and 8 August.¹⁹⁵⁴ Nevertheless, as discussed below, **KARADŽIĆ** failed to exercise his authority to release civilians from camps to return to their homes or properly remedy the substandard conditions and abuses endured by camp prisoners. He and the BSL took relatively superficial measures—such as closing down Omarska and

¹⁹⁴³ E.VULLIAMY:P3777,pp.40-65; E.VULLIAMY:T.21043-21053; P3779; P3780; P3781; P3782; P3785; P3797; P3543.

¹⁹⁴⁴ P3783; E.VULLIAMY:T.21056. *See also* D4716.

¹⁹⁴⁵ [REDACTED]; [REDACTED]; P2772; [REDACTED]; N.SIVAC:P3478,p.137; K.MEŠANOVIĆ:P3528,paras.59-60,64. *See also* AF2489; D470,pp.4,31; C.NIELSEN:P2958,para.301.

¹⁹⁴⁶ E.VULLIAMY:T.21057-21058. *See also* P3724,p.2; P731.

¹⁹⁴⁷ M.SEJMENOVIĆ:T.20503-20504. *See also* Z.MEJAKIĆ:T.44273-44274; P3549,p.4;

K.MEŠANOVIĆ:T.19840.

¹⁹⁴⁸ M.SEJMENOVIĆ:T.20503-20505.

¹⁹⁴⁹ M.SEJMENOVIĆ:T.20509-20510.

¹⁹⁵⁰ D470,p.4; KW609:T.46137; K.MEŠANOVIĆ:T.19840; [REDACTED]

¹⁹⁵¹ Ž.MEJAKIĆ:T.44273-44274.

¹⁹⁵² P3070.

¹⁹⁵³ D465.

¹⁹⁵⁴ P3071.

Keraterm¹⁹⁵⁵—while allowing the system of detention of non-Serb civilians in abusive and sub-standard conditions to continue.¹⁹⁵⁶

531. Similarly, as expulsions of non-Serbs continued in 1993 and 1994, international observers persisted in their reports and protests to **KARADŽIĆ**. For example, Vojislav ĐURKOVIĆ ("VOJKAN")—an SDS "field operative"¹⁹⁵⁷ and member of ARKAN's unit¹⁹⁵⁸—[REDACTED] [REDACTED] was specifically identified in a number of international reports and letters to **KARADŽIĆ** beginning in September 1993 and continuing into 1994.¹⁹⁶⁰

532. As over 2,400 Muslims were expelled from Bijeljina to Tuzla between mid-July and early September 1994,¹⁹⁶¹ UNHCR, UNPROFOR and the ICRC wrote and spoke to **KARADŽIĆ** repeatedly, calling for action. On 20 August, Yasushi AKASHI raised the abuses in Bijeljina with **KARADŽIĆ** directly.¹⁹⁶² Nevertheless, large numbers of refugees continued to arrive in Tuzla in late August.¹⁹⁶³ By 30 August, the ICRC had made "repeated representations at all levels" regarding the developments in Bijeljina, to no avail.¹⁹⁶⁴ Over the next few days, the expulsions "increased dramatically in size."¹⁹⁶⁵ On 5 September, UNHCR wrote to **KARADŽIĆ** noting that it had expressed "the gravest concern" regarding these practices on "many occasions", yet the expulsions "continue and even intensify".¹⁹⁶⁶ On 20 September, AKASHI conveyed to **KARADŽIĆ** his "utter dismay" at the recent expulsions of more than 2,500 Muslims who were forced to cross the frontline between Bijeljina and Tuzla on 18 and 19 September.¹⁹⁶⁷

¹⁹⁵⁵ P6585. *See also* M.MANDIĆ:T.4596; P6584.

¹⁹⁵⁶ *See* III.C.8.(c): Exchange Commission; III.D.2.(a): **KARADŽIĆ** made no genuine attempt to exercise his authority to prevent crimes or punish the perpetrators.

¹⁹⁵⁷ M.DAVIDOVIĆ:P2848,para.159.

¹⁹⁵⁸ D.ANDAN:T.40869; M.DAVIDOVIĆ:T.15714-15716; P2858; Ž.FILIPOVIĆ:T.35799; D.LJUBOJEVIĆ:T.35897-35898. *See also* D1136,para.6.

¹⁹⁵⁹ *See* [REDACTED]. *See further* Bijeljina Summary.

¹⁹⁶⁰ [REDACTED]; P2471,para.8; P2087; D1136,para.6; P5423,p.2.

¹⁹⁶¹ D3145,p.2.

¹⁹⁶² D3145,p.1. *See also* P5423,p.2.

¹⁹⁶³ D3145,p.1.

¹⁹⁶⁴ P5483.

¹⁹⁶⁵ D3145,p.2.

¹⁹⁶⁶ P2087.

¹⁹⁶⁷ P5423,p.2; P2932; P5423,p.2.

533. On 23 September, the UNSC expressed its grave concerns "at the persistent and systematic campaign of terror perpetrated by the Bosnian Serb forces in Banja Luka, Bijeljina and other areas [...] under the control of Bosnian Serb forces" and demanded "that the Bosnian Serb authorities immediately cease their campaign of 'ethnic cleansing'".¹⁹⁶⁸ In late 1994, BBC journalist Jeremy BOWEN met with VOJKAN in Bijeljina, and witnessed his open and "institutionalised" ethnic cleansing activities first hand, in the presence of a "minder from the Bosnian Serb press office in Pale".¹⁹⁶⁹ As discussed below, despite these reports and international pressure, **KARADŽIĆ** "turn[ed] a blind eye" to VOJKAN's activities because they furthered **KARADŽIĆ**'s goal of having as few Muslims as possible in BiH.¹⁹⁷⁰

2. **KARADŽIĆ** failed to prevent common purpose crimes or punish the perpetrators

534. Well aware of the crimes committed in furtherance of the common purpose, and positioned at the apex of the military and civilian justice systems, **KARADŽIĆ**'s intent for those crimes is illustrated by his failure to make any genuine effort to exercise his authority to prevent those crimes or punish the perpetrators. Instead, he propagated a policy of non-prosecution of crimes against non-Serbs, and rewarded notorious perpetrators.

(a) **KARADŽIĆ** made no genuine attempt to exercise his authority to prevent crimes or punish the perpetrators

535. **KARADŽIĆ** and the BSL's response to the flood of information about abusive conditions in camps and the detention of civilians¹⁹⁷¹ exemplifies their efforts to perpetuate the common purpose while pretending to take steps to bring it to a halt. Rather than exercise their authority over the camps to put an end to unlawful detentions and prisoner abuses, **KARADŽIĆ** and other BSL members worked to ensure the system of detention in sub-standard conditions—as part of their broader campaign of permanent removal—would continue.

536. **KARADŽIĆ**'s ability to release camp detainees is demonstrated by his release or 'pardon' of a handful of individuals for personal or political reasons, while

¹⁹⁶⁸ P5424.

¹⁹⁶⁹ J.BOWEN:T.10099-10103; J.BOWEN:P2068,para.11; P2073.

¹⁹⁷⁰ See Brief,paras.82-83,553-555.

allowing thousands of non-Serbs to languish in sub-standard conditions.¹⁹⁷² For example, in September 1992, the Presidency ordered the release from Manjača and Trnopolje of 69 detainees who were "quite ill" and whose appearance was "attracting attention from the media and humanitarian organisations",¹⁹⁷³ including minors and men suffering from tuberculosis, kidney disease and diabetes.¹⁹⁷⁴ **KARADŽIĆ** later characterised this release of "69 sick people" as a way to get "great credit among the international public".¹⁹⁷⁵

537. In the face of the international outcry regarding camps, the BSL commissioned a number of reports into camps and prisoners.¹⁹⁷⁶ Those inquiries reveal no meaningful attempt to determine the legitimacy of the detention or the treatment to which detainees had been subjected, much less an effort to determine responsibility and hold accountable those responsible for illegal detention and systemic maltreatment. To the extent that these reports touch upon the issue of civilian detention and mistreatment in facilities, their findings contrast so starkly with reports by international organisations and the internal information available to the inquiry members and the BSL that they can only be understood as a cover-up.¹⁹⁷⁷

538. [REDACTED]

539. Though the Presidency decided to close down Omarska and Keraterm camps in August 1992, in part due to international pressure,¹⁹⁷⁹ it was not until 27 October 1992 that the Government concluded that "existing illegal camps and assembly

¹⁹⁷¹ III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.

¹⁹⁷² M.MANDIĆ:C2,p.249. *See also* M.MANDIĆ:C2,pp.204,207-208; P1101; M.MANDIĆ:T.4599,4606,4608; [REDACTED]; D1894; [REDACTED]

¹⁹⁷³ P3491,p.1; R.RADINKOVIĆ:T.45326; P3721.

¹⁹⁷⁴ P3491; R.RADINKOVIĆ:T.45326.

¹⁹⁷⁵ D456,p.55; R.RADINKOVIĆ:T.45329-45330.

¹⁹⁷⁶ *See* P1093; P1092; P3098,pp.10-11; D3109.

¹⁹⁷⁷ P3549; [REDACTED]; P534; D447,p.7; P1096,p.3; P1097; D430,p.7.

¹⁹⁷⁸ [REDACTED].

¹⁹⁷⁹ P6585; P5555,p.4; AF2486; P6584. *See also* M.MANDIĆ:T.4596.

centers are to be dissolved as soon as possible".¹⁹⁸⁰ By this time, the network of makeshift detention facilities had already largely served its primary purpose of gathering and permanently removing the non-Serb population from RS-held territory. Further, non-Serb civilians continued to be detained and abused in prisons for years, including in Rasadnik, KP Dom Foča, Batković and Kula,¹⁹⁸¹ and the BSL continued to use the Exchange Commission to expel these civilian detainees.¹⁹⁸²

540. The BSL accompanied such superficial remedial measures with empty promises to the international community. On 21 August 1992, for example, **KARADŽIĆ** pledged that "[w]e shall prevent ethnic cleansing" and "[w]e shall carry out investigations into all cases of doubt about forceful transfer of the civilian population and shall punish all responsible persons".¹⁹⁸³ Apart from the fact that his own Government had institutionalised ethnic cleansing and forceful transfer of civilians through the Exchange Commission,¹⁹⁸⁴ the cleansing of Serb-coveted areas that had already taken place by that date, and the expulsions, detentions, and killings of non-Serb civilians which the BSL allowed to continue in some of these areas until the end of the war, render such commitments utterly hollow.

541. The Defence relied throughout trial on a number of orders issued by **KARADŽIĆ** that address or touch upon crimes against non-Serbs, presumably in an attempt to negate his intent for those crimes.¹⁹⁸⁵ The evidence shows these orders were simply window dressing designed to disguise **KARADŽIĆ**'s role in supporting the very crimes he was purporting to address.

542. For example, **KARADŽIĆ** relies upon a 14 July 1992 telegram¹⁹⁸⁶ to presidents of all municipalities in the Goražde area, holding them responsible for the protection of Croat and Muslim villagers who had handed over their weapons. However, as Sokolac CS President TUPAJIĆ's response makes clear, this telegram reflects **KARADŽIĆ**'s disingenuous efforts to pass responsibility for protecting non-

¹⁹⁸⁰ P3102,p.6.

¹⁹⁸¹ See P2684,p.1. See further SIC:C.2.1;C.10.1;C.18.2;C.21.3(Bijeljina; Foča; Ilidža; Rogatica).

¹⁹⁸² See III.C.8.(c): Exchange Commission.

¹⁹⁸³ D109.

¹⁹⁸⁴ See III.C.8.(c): Exchange Commission.

¹⁹⁸⁵ See e.g. T.1728,1733-1734,1736-1737,1739-1742,1745-1748,1753-1763,1765-1767,1773,1777-1778,1780-1781,1784-1787; S.KRALJ:T.36555-36557; T.9843; M.KRAJIŠNIK:T.43316; T.15693-15698; [REDACTED]; T.46140-46142.

¹⁹⁸⁶ D95; D3190.

Serbs onto those outside the military and police chains of command—chains of command over which **KARADŽIĆ** himself exercised ultimate authority.¹⁹⁸⁷

543. Other orders issued in English and/or presented to international organisations and negotiators were clearly intended for an international audience.¹⁹⁸⁸ For example, **KARADŽIĆ** brought his 12 August 1992 order that "forced transfer of people and other illegal measures against [the] civilian population must be prevented", and certificates transferring property "are not legally valid and are out of force"¹⁹⁸⁹ to the attention of the London Conference, accompanied by his claim that "ethnic cleansing has been an issue of prime concern to me".¹⁹⁹⁰

544. **KARADŽIĆ**'s April 1994 order to take steps "in order to shed light on the crimes committed in the [RS], with particular urgency in Prijedor"¹⁹⁹¹ only highlights his failure to address the horrific crimes in that municipality in 1992¹⁹⁹² which came to his attention almost immediately.¹⁹⁹³ Similarly, **KARADŽIĆ**'s order that **MLADIĆ**, **STANIŠIĆ** and **MANDIĆ** ensure the ICRC "unfettered access to prisons and prisoners" on 22 October 1992¹⁹⁹⁴ came only after **KARADŽIĆ**'s failed attempt to keep the international community from discovering the terrible conditions at Omarska and Trnopolje, and after the camps had largely served their purpose.¹⁹⁹⁵ Moreover, this order addresses a relatively peripheral problem with the camps—lack of ICRC access—when viewed in light of the systematic detention and expulsion of civilians that was taking place and that the camps were designed to implement.¹⁹⁹⁶

545. Similarly, **KARADŽIĆ**'s order banning the formation and operation of paramilitaries in June 1992 and putting existing groups and individuals "under the unique command of either the [VRS] or [MUP]"¹⁹⁹⁷ was a wholly inadequate

¹⁹⁸⁷ P6236. *See also* D.OBRADOVIĆ:T.36117-36118; M.TUPAJIĆ:P5238,pp.56-58,62-63,65-66; R.NESKOVIĆ:P2568,p.124.

¹⁹⁸⁸ D1850; D93; D1138; D109.

¹⁹⁸⁹ D1754; D101.

¹⁹⁹⁰ D4720,p.1.

¹⁹⁹¹ D1138.

¹⁹⁹² *See* SICs(Prijedor); Prijedor Summary.

¹⁹⁹³ *See* III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.

¹⁹⁹⁴ D103.

¹⁹⁹⁵ III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose;

III.C.8.(c): Exchange Commission. *See also* Prijedor Summary.

¹⁹⁹⁶ *See* III.C.8.(c): Exchange Commission.

¹⁹⁹⁷ D93.

response to the rampant crimes against non-Serbs committed by paramilitaries.¹⁹⁹⁸ Indeed, not only were paramilitaries known to have committed crimes incorporated into regular army and police structures,¹⁹⁹⁹ but many were lauded by **KARADŽIĆ** for their services to the RS.²⁰⁰⁰ In the same manner, as discussed above, the various reports the BSL ordered and produced in relation to detention facilities were obvious whitewashing efforts that were not accompanied by any steps to properly remedy the situation or hold perpetrators accountable.²⁰⁰¹

546. Moreover, despite **KARADŽIĆ**'s enormous power and authority, his failure to ensure the implementation of orders ostensibly directed at preventing or punishing crimes against civilians²⁰⁰²—as demonstrated by the continuation of crimes against non-Serbs throughout the war, and the promotion or rewarding of notorious perpetrators²⁰⁰³—demonstrates their disingenuous nature.²⁰⁰⁴ For example, while **KARADŽIĆ** demanded "an inspection of work of the military prosecution in Bijeljina" in order to address its "flaws" in January 1994,²⁰⁰⁵ he deliberately allowed one of Bijeljina's most notorious criminals—**VOJKAN**—to forcibly expel Muslims throughout 1994.²⁰⁰⁶

547. Evidence of crimes against non-Serbs slowing or abating in specific instances connected to international presence or pressure²⁰⁰⁷ demonstrates the ability of **KARADŽIĆ** and the BSL to address these crimes, and their selective use of this authority to further their political interests.

548. Any doubt about the disingenuous nature of these orders is resolved by the fact of **KARADŽIĆ**'s explicit policy that there be no arrests of Serbs, regardless of

¹⁹⁹⁸ See Bijeljina, Bratunac, Brčko, Zvornik Summaries; III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP; III.D.2.(b): **KARADŽIĆ** propagated a policy of non-prosecution of crimes against non-Serbs. See also [REDACTED].

¹⁹⁹⁹ See III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

²⁰⁰⁰ See III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

²⁰⁰¹ See III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.

²⁰⁰² See e.g. D434; P1090; D96; D101; P3609; D102; D4255; D104; D43; D108. See also D426; D1850; D94; D701,p.2; S.KRALJ:T.36555-36557; M.MANDIĆ:T.5081-5082; T.GLAVAŠ:T.11955.

²⁰⁰³ See III.D.2.(c): **KARADŽIĆ** rewarded perpetrators of crimes against non-Serbs; III.C.5.(c): The strategic objectives were transformed into concrete results on the ground; III.C.6: Pattern of crimes.

²⁰⁰⁴ See also H.OKUN:T.1818; [REDACTED].

²⁰⁰⁵ D1419. See also M.DAVIDOVIĆ:T.15677; D1425. See further P2900,pp.2,6. But see

M.DAVIDOVIĆ:P2848,para.101.

²⁰⁰⁶ See Bijeljina Summary; Brief,paras.82-83,531-533,556-558.

²⁰⁰⁷ [REDACTED]; [REDACTED].

the crimes they had committed, which (as discussed below) was implemented by both the military and civilian justice systems.²⁰⁰⁸

(b) KARADŽIĆ propagated a policy of non-prosecution of crimes against non-Serbs

549. From the beginning of the conflict, **KARADŽIĆ**'s position was clear: there should be no arrests of Serbs or conflicts between Serbs, even at the expense of not punishing perpetrators of crimes.²⁰⁰⁹ **KARADŽIĆ** blocked the investigation and punishment of crimes in accordance with his explicit position that "this could be dealt with later".²⁰¹⁰ **KARADŽIĆ**'s policy—reflected in the actions of those tasked with investigating and prosecuting crimes on the ground—furthered the common plan to permanently and forcibly remove non-Serbs from Bosnian Serb-claimed territory by allowing the crimes charged in Counts 1 and 3-8 to continue unchecked. As ĐERIĆ explained, given **KARADŽIĆ**'s policy, it was "[n]o wonder the problem escalated in this period of time".²⁰¹¹

550. **KARADŽIĆ**'s policy to 'delay' investigation and prosecution of crimes committed by Serbs was reflected in the activity of both the military and civilian justice systems. While it was "common knowledge"²⁰¹² that Serbs were killing non-Serbs in 1992, the priority cases before the newly-founded Bijeljina and Banja Luka Military Courts in August 1992 involved failure to respond to mobilisation and desertion.²⁰¹³ Similarly, the focus of SJB investigations was "Muslim extremists" or "genocide against the Serbian nation", while mass crimes against non-Serbs were essentially ignored.²⁰¹⁴ As one Defence witness admitted, after examining the Ključ Prosecutor's Office Logbook for 1992, "[t]he only thing I can conclude from this is that reports were filed against one side only and that's the Muslim side".²⁰¹⁵ In

²⁰⁰⁸ See III.D.2.(b): **KARADŽIĆ** propagated a policy of non-prosecution of crimes against non-Serbs.

²⁰⁰⁹ M.DAVIDOVIĆ:P2848,para.54.

²⁰¹⁰ B.ĐERIĆ:P4982,paras.14,15,17,22; B.ĐERIĆ:T:27999.

²⁰¹¹ B.ĐERIĆ:T.28002-28003.

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²⁰¹² [REDACTED]. See also P3606,pp.2-3; D.RAĐETIĆ:T.45697.

²⁰¹⁴ See III.C.8.(h).(v): RSMUP failure to protect non-Serbs or investigate crimes against them.

²⁰¹⁵ S.JURISIĆ:T.47083-47085; P6671.

contrast, Serbs who committed violent crimes against non-Serbs were often released by authorities without trial.²⁰¹⁶

551. A September 1992 IBK report to the VRS-GŠ reflects the common knowledge of mass crime against non-Serbs, the policy of inaction by local officials, and the general climate of impunity. It explains that the Brčko Municipality President had reported that 300 Muslims and Croats were killed in Brčko but he "personally is not upset because of that. When certain organs warned him to take some measures to prevent information leaking, he said he didn't care because there were much larger graves in Prijedor".²⁰¹⁷ Other examples of crimes of which military and/or civilian officials—acting as either JCE members or tools—were aware and failed to punish include the following:

- Municipal authorities in Zvornik were aware of the executions at Drinjača Dom Kulture, and at Karakaj Technical School and Gero's Slaughterhouse, yet no action was taken.²⁰¹⁸
- Bratunac municipal authorities and police learned that villagers from Hranča had been brought to the hanger of Vuk Karadžić School by Serb Forces, but the Bratunac SJB Chief strictly forbade the police from interfering and no action was taken.²⁰¹⁹
- Serb authorities, including the civilian police, failed to adequately investigate or prosecute crimes committed at Manjača, even though the perpetrators' identities were readily available.²⁰²⁰

²⁰¹⁶ See e.g. **Ključ**:A.DŽAFIĆ:P3488,para.42; A.DŽAFIĆ:T.19708-19709; P3616; **Prijedor**: See Brief,paras.553-555; **Brčko**:Đ.RISTANIĆ:P3023,para.210; O.MARKOVIĆ:T.34792-34793; P6176; P6177; **Foča**:R.MLADENOVIĆ:T.36652,36673; [REDACTED]; P6082; P6267,p.2.

²⁰¹⁷ P2889.

²⁰¹⁸ See Zvornik Summary; SIC:A.16.3;B.20.1;B.20.3(Zvornik). See also KDZ555:T.17299-17301; [REDACTED]; J.IVANOVIĆ:T.39875-39878; P.PANIĆ:P3380,p.36; P.PANIĆ:T.19142; [REDACTED].

²⁰¹⁹ B.TEŠIĆ:D3115,para.24; R.ĐUKANOVIĆ:D3194,para.40. See also Bratunac Summary; SIC:C.6.2(Bratunac).

²⁰²⁰ See Banja Luka Summary.

- Although reported to the Prijedor CS, SJB and VRS, no criminal investigation was ever ordered into the Room 3 killings in Keraterm Camp²⁰²¹—a crime that "resounded in Prijedor."²⁰²²
- Despite the regular killings, beatings and mistreatment at the KP Dom Foča, none of the guards were disciplined.²⁰²³ Similarly, none of the men responsible for the systematic rape, abuse and torture of Muslim women and girls at the Foča camps were held accountable for their crimes.²⁰²⁴
- Sokolac municipal authorities were informed of the killings in Novoseoci—an incident that people in Sokolac were "generally talking about" within hours²⁰²⁵—but no investigation was carried out and the bodies were only exhumed in 2000.²⁰²⁶
- Nobody was prosecuted or punished for the crimes committed at Luka Camp in Brčko; both JELISIĆ and ČEŠIĆ remained at large until brought before the ICTY.²⁰²⁷
- As the Novo Sarajevo Municipality President reported, mass looting, rapes and expulsions were "going unpunished".²⁰²⁸ For example, while informed of beatings, rapes and plunder committed by notorious criminal Veselin VLAHOVIĆ (a.k.a. BATKO) against non-Serbs in Novo Sarajevo, Serb authorities took virtually no action to apprehend or punish him. ĐERIĆ reported BATKO's crimes to KARADŽIĆ who "thought that this could be dealt with later."²⁰²⁹
- While it was widely known that Serb Forces were committing crimes against Muslims during and following the takeover of Vlasenica including killing

²⁰²¹ See Prijedor Summary.

²⁰²² M.STAKIĆ:D4195,para.24. See also M.KVOČKA:T.45622; S.MIŠKOVIĆ:T.45393-45394.

²⁰²³ See Foča Summary.

²⁰²⁴ See Foča Summary.

²⁰²⁵ D.OBRADOVIĆ:T.36095-36096,36129. See also M.TUPAJIĆ:P5238,pp.106-107.

²⁰²⁶ See Sokolac Summary; SIC:A.13.1(Sokolac).

²⁰²⁷ See Brčko Summary.

²⁰²⁸ P5065,p.12. See also Novo Sarajevo Summary.

²⁰²⁹ B.ĐERIĆ:P4982,paras.14-14a. See also Novo Sarajevo Summary.

civilians and detainees, not a single case was prosecuted and no disciplinary measures were imposed.²⁰³⁰

552. These and other instances of local inaction in response to crimes against non-Serbs not only reflect **KARADŽIĆ**'s own non-prosecution policy, they also echo **KARADŽIĆ**'s reactions to serious crimes against non-Serbs that were brought to his personal attention.

553. For example, as noted above, by 23 August—two days after the Korićanske Stijene massacre—news of the killings had already reached **KARADŽIĆ**.²⁰³¹ In his Defence, **KARADŽIĆ** emphasised his "enraged" response.²⁰³² However, the evidence shows he was angered by the publicity surrounding the crime—at a time when he was already under pressure as a result of VULLIAMY and ITN's coverage of Omarska and Trnopolje²⁰³³—rather than the crime itself. Indeed, what followed **KARADŽIĆ**'s 23 August phone call was a calculated strategy of delay and deception at all levels to avoid international scrutiny and opprobrium.²⁰³⁴

554. On **KARADŽIĆ**'s return from London, the RS Presidency hurriedly met to discuss the massacre.²⁰³⁵ **KARADŽIĆ** then dispatched Defence Minister SUBOTIĆ to Banja Luka.²⁰³⁶ By this time, the very perpetrators of the crime—on DRLJAČA's orders and in his and ŽUPLJANIN's presence—had already begun their (ultimately unsuccessful) attempt to remove, burn and eventually hide the bodies at the crime scene.²⁰³⁷ From that point on, SUBOTIĆ coordinated the cover-up, chairing meetings

²⁰³⁰ See Vlasenica Summary.

²⁰³¹ See Brief, para. 521.

²⁰³² V. GLAMOČIĆ: T.47234-47235; B. SUBOTIĆ: D3695, paras. 243, 246; M. KOMLJENOVIC: P3768, para. 5.

²⁰³³ See Brief, paras. 528-529. See also AF2484; P5437, p. 2; E. BROWN: P3914, paras. 2.125-2.126.

²⁰³⁴ See e.g. P3929, p. 4; AF2491.

²⁰³⁵ B. SUBOTIĆ: D3695, paras. 242-246.

²⁰³⁶ B. SUBOTIĆ: D3695, paras. 242-246.

²⁰³⁷ AF2490; D. JANKOVIĆ: T.47346-47348; [REDACTED]; [REDACTED]; N. KREJIĆ: P3760, pp. 25-26, 31; V. GLAMOČIĆ: T.47240-47241; P6673; M. KOMLJENOVIC: T.20916-20919; M. KOMLJENOVIC: P3768, paras. 13-14, 19, 23.

with relevant officials,²⁰³⁸ [REDACTED]
 [REDACTED] and reporting back to **KARADŽIĆ**.²⁰⁴⁰

555. ARK and RS officials issued *pro forma* orders to investigate,²⁰⁴¹ which were never implemented. The police intervention platoon was disbanded and its members sent on a combat mission at Han Pijesak,²⁰⁴² where DRLJAČA claimed he could no longer reach them for questioning.²⁰⁴³ Police, military, judicial and municipal authorities all refused to take responsibility for the investigation,²⁰⁴⁴ citing a range of excuses that ring hollow in light of the perpetrators' treatment: DRLJAČA was promoted by republic authorities and rewarded by **KARADŽIĆ**,²⁰⁴⁵ as were others involved in the killings and cover-up;²⁰⁴⁶ no further investigation was requested until 1999;²⁰⁴⁷ and RS authorities never held anyone responsible.²⁰⁴⁸

556. Similarly **KARADŽIĆ** responded to the repeated concerns expressed by international observers regarding VOJKAN's expulsion of Bijeljina Muslims in 1993 and 1994,²⁰⁴⁹ with false assurances while deliberately allowing VOJKAN to continue his crimes.

557. On 20 August 1994, in discussions with AKASHI in Pale, **KARADŽIĆ** "attributed the problem to criminals and undertook to replace the Chief of Police".²⁰⁵⁰ As the expulsions "increased dramatically in size" over the following weeks,²⁰⁵¹

²⁰³⁸ B.SUBOTIĆ:T.40106-40108; N.KREJIĆ:P3760,pp.28-30;
 M.KOMLJENOVIĆ:P3768,paras.4,13,19; S.AVLJIAŠ:T.35186-35187; P3769,pp.12-13;
 N.KREJIĆ:T.20869.

²⁰³⁹ [REDACTED]
 N.KREJIĆ:P3760,pp.30-32; M.KOMLJENOVIĆ:P3768,paras.4,14.

²⁰⁴⁰ See e.g. P3073.

²⁰⁴¹ See e.g. M.STAKIĆ:D4195,para.30; D1881; P3763; D1884. See also
 C.NIELSEN:P2958,paras.327-328.

²⁰⁴² D.JANKOVIĆ:T.47303-47304,47345-47349; [REDACTED];
 [REDACTED]; D1882; AF2492; D1885.

²⁰⁴³ [REDACTED]; P3763; C.NIELSEN:P2958,paras.327-328; AF2492;
 D1882; D1885.

²⁰⁴⁴ See e.g. B.SUBOTIĆ:T.40106-40109; G.MAČAR:T.39493-39498; M.STANIŠIĆ:T.46412,46545-
 46547; M.KOMLJENOVIĆ:P3768,paras.4-9,13; V.GLAMOČIĆ:T.47243-47244,47246;
 M.STAKIĆ:D4195,para.30; J.JANKOVIĆ:T.45989,45990,45992-45994,46006-46008,46013; D2043.
 See also D2044; [REDACTED]; D4236; D4238; D4237; D1883.

²⁰⁴⁵ D3107; P4261,p.1; P2978,p.2; P4265; P6638. See also S.AVLJIAŠ:T.35188-35190.

²⁰⁴⁶ P4261,pp.1-2; P2978,pp.5,7; [REDACTED]; [REDACTED].
²⁰⁴⁷ D1886.

²⁰⁴⁸ [REDACTED]; C.NIELSEN:P2958,para.328;

E.BROWN:P3914,paras.2.88-2.91.

²⁰⁴⁹ See Brief,paras.82-83,531-533,546.

²⁰⁵⁰ D3145,p.1. See also P5423,p.2.

²⁰⁵¹ D3145,p.2.

KARADŽIĆ assured AKASHI and Vieira de MELLO that he had "taken measures to identify, arrest, and prosecute those responsible" for the expulsions,²⁰⁵² claiming that Bijeljina's Police Chief had been replaced, and that "two small independent criminal gangs had been identified", adding that "it would take time to identify the remaining criminal sub-groups".²⁰⁵³ De MELLO pressed **KARADŽIĆ** for VOJKAN's arrest.²⁰⁵⁴ Despite **KARADŽIĆ**'s claim to have initiated investigations into VOJKAN's role in the expulsions,²⁰⁵⁵ VOJKAN remained at large, and the expulsions continued.²⁰⁵⁶ Indeed, on 15 September, de MELLO stressed that "[b]y the time the investigations were over there would be nobody left to expel".²⁰⁵⁷ When more than 2,500 Muslims were forced to cross the frontline between Bijeljina and Tuzla on 18 and 19 September,²⁰⁵⁸ AKASHI again reminded **KARADŽIĆ** of the commitments he had repeatedly made to stop the forceful expulsions.²⁰⁵⁹

558. Nevertheless, VOJKAN was still expelling Bijeljina Muslims in July 1995,²⁰⁶⁰ and no genuine efforts were made to punish him for these crimes.²⁰⁶¹ Rather, VOJKAN was publicly honoured.²⁰⁶² At an August 1995 Supreme Command meeting, **KARADŽIĆ** made clear why he did not take the "resolute corrective action" towards VOJKAN he had promised to international agencies.²⁰⁶³ He explained that a "private agenc[y]" making "private arrangement[s]" was "absolutely none of our business".²⁰⁶⁴ Thus the BSL could "turn a blind eye"²⁰⁶⁵ to VOJKAN's activities—activities which, as **KARADŽIĆ** noted, would result in an accusation of ethnic cleansing if done by a state institution.²⁰⁶⁶ As MILOVANOVIĆ explained,

²⁰⁵² D3145,p.1; P5423,p.2; D1136,para.6.

²⁰⁵³ D1136,para.6. *See also* P2458,para.6.

²⁰⁵⁴ D1136,para.6.

²⁰⁵⁵ P3862,para.7.

²⁰⁵⁶ P3862,para.7; P5423,p.2.

²⁰⁵⁷ P3862,para.7. *See also* P5423,p.2.

²⁰⁵⁸ P2932; P5423,p.2.

²⁰⁵⁹ P5423,p.2.

²⁰⁶⁰ D1429.

²⁰⁶¹ M.DAVIDOVIĆ:T.15702-15707; D1429; S.MIHAILOVIĆ:D3137,para.14;

S.MIHAILOVIĆ:T.35737-35740; [REDACTED]

²⁰⁶² M.DAVIDOVIĆ:T.15712-15713,15715,15821-15823. *See also* P2858.

²⁰⁶³ P2087.

²⁰⁶⁴ P3149,p.65. *See also* M.MILOVANOVIĆ:T.25540-25544.

²⁰⁶⁵ P3149,p.66.

²⁰⁶⁶ P3149,pp.65-66.

KARADŽIĆ's remarks reflect his view that "it would be good to have as small as possible number of Muslims in Bosnia and Herzegovina".²⁰⁶⁷

559. RS authorities also failed to prosecute paramilitaries for crimes committed against non-Serbs, and, as discussed above, took action against them only after the common purpose had largely been implemented and those groups began to turn their criminality towards Serbs or became too powerful.²⁰⁶⁸ Despite their known propensity for crimes, particularly against non-Serbs, paramilitaries were often simply incorporated into the VRS or MUP.²⁰⁶⁹

560. [REDACTED]

[REDACTED] Thus, by early 1993, it had become a Banja Luka Military Court practice to unlawfully revoke mandatory custody in the handful²⁰⁷² of cases involving Serb accused, and to send them off to the battlefield.²⁰⁷³ Examples of successful interventions by military or civilian authorities in cases involving Serb accused and non-Serb victims include the following:

- Despite reasonable grounds to suspect Ključ Brigade members committed war crimes by killing scores of Muslim civilians at Velagići school in June 1992,²⁰⁷⁴ the VRS soldiers arrested in connection with the killings were released to their units shortly thereafter,²⁰⁷⁵ and the Military Prosecutor (with the support of the RS Deputy Prime Minister and Ključ Municipality Executive Committee Chairman) proposed that the investigation be suspended

²⁰⁶⁷ M.MILOVANOVIC:T.25543-25545.

²⁰⁶⁸ See III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP. See also Bijeljina, Brčko, Zvornik Summaries.

²⁰⁶⁹ See III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP.

²⁰⁷⁰ [REDACTED]; P3632.

²⁰⁷¹ [REDACTED]; . See e.g. P3612; P3610; P3611.

²⁰⁷² P3607; P3608;

²⁰⁷³ [REDACTED]. See also P3612;

[REDACTED]; P2972,p.2; D.KESEROVIĆ:T.42018-42019.

²⁰⁷⁴ P3613; P3614; P3513; [REDACTED]. See also SIC:B.10.1(Ključ).

²⁰⁷⁵ AF2447.

in July 1993.²⁰⁷⁶ The Military Court agreed to the proposal and released the two suspects in detention.²⁰⁷⁷ To date, none have been prosecuted.²⁰⁷⁸

- SOS and 6th Brigade member Daniluško KAJTEZ confessed to killing several Croat civilians in Škrļjevita village in November 1992.²⁰⁷⁹ He was released as a result of pressure exerted on the Military Court by, among others, Sanski Most SDS Municipal Board President Vlado VRKEŠ.²⁰⁸⁰
- Although accused MP members confessed²⁰⁸¹ to killing Salko KUKIĆ, a Bosniak IBK unit commander,²⁰⁸² and the evidence gathered implicated the accused,²⁰⁸³ nine days after the investigating judge decided to open an investigation²⁰⁸⁴ the case was terminated by the Military Prosecutor following the IBK Chief of Security's intervention.²⁰⁸⁵

561. **KARADŽIĆ** cannot plausibly distance himself from such interventions by his subordinates and officials given that they were wholly consistent with his explicit non-prosecution policy, and in light of **KARADŽIĆ**'s enormous power and authority, which would have enabled him to ensure the proper functioning of the military justice system. [REDACTED]

562. The resulting climate of impunity [REDACTED]

²⁰⁷⁶ P3616; [REDACTED]

²⁰⁷⁷ P6143, pp.1-2; [REDACTED]

[REDACTED] N.TODOROVIĆ:T.34072,34074-34075. *See also* S.JURISIĆ:T.47080-47082.

²⁰⁷⁸ [REDACTED] N.TODOROVIĆ:T.34077.

²⁰⁷⁹ *See* SIC:A.12.5(Sanski Most).

²⁰⁸⁰ *See* Sanski Most Summary.

²⁰⁸¹ [REDACTED] P2930,p.38.

²⁰⁸² [REDACTED]

²⁰⁸³ P2930,pp.9-11,31-32,38-39,41,56-57,63-64; [REDACTED]

²⁰⁸⁴ P2930,pp.5-6,12-14.

²⁰⁸⁵ [REDACTED];

P2930,pp.5-7.

²⁰⁸⁶ [REDACTED]

²⁰⁸⁷ [REDACTED]

As one accused observed, his fellow prisoners "who also killed the Baliya and the Ustasha, are being acquitted and helped by their municipalities".²⁰⁸⁹ By comparison, there was no pressure to release Serb accused where the victim was also a Serb.²⁰⁹⁰ Those cases were tried according to the law.²⁰⁹¹ Exemplifying this differential treatment, Zoran TOMIĆ was charged with killing two families in Bijeljina: the Muslim ĆEHAJIĆ family in late October 1992, and the Serb ALEKSIĆ family in late January 1993.²⁰⁹² The Military Prosecutor dropped the case involving the Muslim family's "brutal" murder, despite the fact that the accused confessed to the crime.²⁰⁹³ The accused was convicted for the Serb family's murder, and imprisoned for 20 years.²⁰⁹⁴

563. Similarly, Zoran ŽIGIĆ—who, along with Duško KNEŽEVIĆ, frequently beat and killed Muslim detainees at Keraterm and Omarska in June 1992²⁰⁹⁵—was initially only arrested and investigated for extorting money from detainees in return for their release.²⁰⁹⁶ On 4 July 1992, three days after ŽIGIĆ's arrest, Duško SIKIRICA reported to the Prijedor SJB that ŽIGIĆ, KNEŽEVIĆ and two others repeatedly entered Keraterm camp and "beat prisoners to exhaustion", resulting in their deaths.²⁰⁹⁷ Nevertheless, ŽIGIĆ was released on 9 July 1992 at the request of KNEŽEVIĆ (writing on behalf of the 43rd Brigade's Sabotage and Reconnaissance Unit), on the basis that his unit was "getting ready to go to the front" and needed this "very capable, obedient and [...] diligent fighter".²⁰⁹⁸ ŽIGIĆ was arrested a second time six weeks later on robbery charges,²⁰⁹⁹ released again in early October 1992,²¹⁰⁰ and only effectively prosecuted after killing a Serb civilian woman in June 1993.²¹⁰¹ ŽIGIĆ was eventually held responsible for his crimes against non-Serbs at Omarska,

²⁰⁸⁸ [REDACTED]

²⁰⁸⁹ P6556.

²⁰⁹⁰ [REDACTED]

²⁰⁹¹ [REDACTED]. Examples of Serbs being lawfully prosecuted and punished for crimes committed against Serbs include the [REDACTED] cases:

[REDACTED]; D1762; [REDACTED]; D1764; [REDACTED]

²⁰⁹² [REDACTED]; P2931.

²⁰⁹³ [REDACTED]; P2931.

²⁰⁹⁴ [REDACTED]; P2931, pp.61-87.

²⁰⁹⁵ See SIC:B.15.2;C.20.2-C.20.3(Prijedor).

²⁰⁹⁶ D1926; D1925; P6597.

²⁰⁹⁷ D4140. See also D.RADETIĆ:T.45690,45711-45713.

²⁰⁹⁸ P6596; P6598. See also D.RADETIĆ:T.45691,45700-45701,45715.

²⁰⁹⁹ P6599.

²¹⁰⁰ P6601. See also P3608, pp.87-90.

²¹⁰¹ D.RADETIĆ:T.45708. See also [REDACTED].

Keraterm and Trnopolje camps by the ICTY,²¹⁰² and KNEŽEVIĆ was convicted of crimes committed in Omarska and Keraterm before the BiH Court.²¹⁰³

564. Likewise, although Ljubomir STANKOVIĆ confessed to murdering two Muslim civilians and attempting to murder two others in August 1992, he was released prior to trial in February 1993. Despite being convicted in October 1993, his sentence was only enforced after he accidentally shot two Serb children in September 1994.²¹⁰⁴

565. None of the Defence attempts to justify the lack of prosecutions for crimes against non-Serbs or the difference in treatment of cases involving Serb and non-Serb accused withstand scrutiny:

- Contrary to Defence claims that the Military Courts were not functioning and the Military Prosecutor's Office lacked the necessary resources to conduct investigations,²¹⁰⁵ successful prosecutions of non-Serbs for armed rebellion demonstrate that they functioned to some degree during the summer of 1992, and were conducting trials by at least September 1992.²¹⁰⁶ Similarly, Defence claims that the RS MUP had insufficient staff and resources to effectively investigate crimes²¹⁰⁷ do not explain the SJBs' focus on investigating crimes against Serbs.²¹⁰⁸
- While charges against some Serb accused released from custody remained pending,²¹⁰⁹ even criminals who confessed to murdering non-Serbs were

²¹⁰² Ž.MEJAKIĆ:T.44234-44235.

²¹⁰³ Ž.MEJAKIĆ:T.44234.

²¹⁰⁴ [REDACTED] P6146; [REDACTED]. See also N.TODOROVIĆ:T.34082-34087;

²¹⁰⁵ See [REDACTED];
N.TODOROVIĆ:D2986,paras.4-5,20; D.RADETIĆ:D4226,paras.8-9,34; D.RADETIĆ:T.45694-45695.

²¹⁰⁶ [REDACTED]
P3605,p.2; P3608. See also D2999.

²¹⁰⁷ See e.g. G.MAČAR:D3663,paras.23-27.

²¹⁰⁸ See III.C.8.(h).(v): RSMUP failure to protect non-Serbs or investigate crimes against them.

²¹⁰⁹ See e.g. [REDACTED]

released,²¹¹⁰ demonstrating a lack of will on the authorities' part to prevent the commission of serious crimes against non-Serbs.

- Purported difficulties in locating witnesses²¹¹¹ do not account for the failure to investigate or prosecute notorious crimes,²¹¹² the practice of releasing even self-confessed accused, or the drastic difference in treatment of cases involving Serb and non-Serb accused.
- While at the very beginning of the conflict there may have been some ambiguity as to whether certain specific cases fell within the jurisdiction of the military or civilian justice system,²¹¹³ and while Defence witnesses who previously served in the MUP often blamed the military for failing to process crimes against non-Serbs and vice versa,²¹¹⁴ this does not account for the total failure to conduct any effective investigation or prosecution of cases involving mass crimes committed against non-Serbs.²¹¹⁵

566. The handful of successful prosecutions of Serbs for crimes committed against non-Serbs²¹¹⁶ only underscores the fact that they were generally "insufficient and inadequate."²¹¹⁷

²¹¹⁰ For example, Special Brigade member Rade MIHAJLOVIĆ, despite confessing to firing 25 rounds from an automatic rifle at point blank range into a Muslim detainee in his bed at the Bijeljina barracks on 27 September 1992, was released from detention on 30 December 1992. He was only tried in absentia in 2001. D1476, pp.2-3; D1473; D1470; D1471; D1472; D1473; [REDACTED]/P6179(partial duplicates); P6180/[REDACTED](duplicates); D1476; D1477; D1478; [REDACTED]; S.BOJANOVIĆ:T.34813-34816,34835-34841,34866-34871; D1479; D1480. Similarly, despite "confess[ing] fully" to killing nine Croatian civilians from Sasina village in December 1992, the four accused Serb soldiers in the GVOZDEN case were released from custody within a month after expressing their willingness to return to their unit. [REDACTED] D1795; P3623; P3624.

²¹¹¹ See [REDACTED].

²¹¹² [REDACTED].

²¹¹³ See e.g. M.MANDIĆ:T.5111,5125-5127; S.BOJANOVIĆ:D3076,para.16. See also [REDACTED].

²¹¹⁴ See e.g. Sokolac/Novoseoci:D.OBRADOVIĆ:T.36096-36097,36100-36103; Zvornik/Drinjača:M.VASILIC:T.39937-39938; Prijedor: Compare D.RADETIĆ:T.45690-45691 with P6599; B.SUBOTIĆ:T.40106-40109; M.STANIŠIĆ:T.46545-46547.

²¹¹⁵ See e.g. D.SPASOJEVIĆ:T.35860-35862.

²¹¹⁶ See D1465; D1466; D1467; D1468; D1469; D1481; D1482; D1483; D1484; D1485; D1486; D1487; D3078; D1488; [REDACTED]; D1490; D1757; [REDACTED]; [REDACTED] D1799; D3079; D3080; D3081; D3082; D3083; D3084; D3085; D3086; D3087; D3088. See also [REDACTED].

[REDACTED] N.TODOROVIC:T.34095-34096, [REDACTED]; S.BOJANOVIĆ:T.34817-34828; S.BOJANOVIĆ:D3076,paras.23-27.

²¹¹⁷ [REDACTED].

(c) KARADŽIĆ rewarded perpetrators of crimes against non-Serbs

567. A number of notorious perpetrators—who either participated as members of the JCE or were used as tools—were rewarded rather than punished. The accolades received by ARKAN and VOJKAN are discussed above.²¹¹⁸ Other examples include:

- Stanislav GALIĆ—whose 1KK 30th Division subordinates were involved in the killings at Velagići²¹¹⁹—was promoted to the rank of General by **KARADŽIĆ** and later given SRK command.²¹²⁰
- Simo DRLJAČA—who, as Prijedor SJB Chief in 1992, oversaw the notorious Omarska and Keraterm camps, and whose subordinates participated in the massacre of approximately 200 Trnopolje detainees at Korićanske Stijene—was promoted.²¹²¹ Moreover, both he and his subordinates received commendations from **KARADŽIĆ**.²¹²²
- TG Foča commander Gojko JANKOVIĆ and his subordinates—who participated in the systematic killings, rapes, beatings and mistreatment of male and female Muslim detainees—were publicly lauded by Miroslav STANIĆ for their role in Foča’s takeover.²¹²³ In addition, JANKOVIĆ’s subordinate STANKOVIĆ was promoted by **KARADŽIĆ** to commander of a special police unit.²¹²⁴
- Radislav KRSTIĆ—whose subordinates murdered at least 40 men and boys in Novoseoci village in Sokolac—was later promoted to DK Chief of Staff.²¹²⁵
- Rogatica Brigade Commander Rajko KUŠIĆ—who was responsible for horrendous crimes against non-Serbs in both Rogatica and Pale²¹²⁶—was

²¹¹⁸ See III.C.8.(I): Paramilitaries/Volunteers/Serbian MUP; III.B.5.(j): Željko RAŽNATOVIĆ, a.k.a. ARKAN; Brief, paras.82-83,546.

²¹¹⁹ See SIC:B.10.1(Ključ).

²¹²⁰ S.GALIĆ:T.37155; P2650; R.THEUNENS:P3033,p.504. See also Ključ Summary.

²¹²¹ P4261,p.1; P2978,pp.1-2; P4265; P6638. See also SIC:B.15.6(Prijedor); Prijedor Summary.

²¹²² P4261. See also P2978,pp.1-2,7; [REDACTED]; [REDACTED].

²¹²³ P6081. See also Foča Summary.

²¹²⁴ P6267,p.2.

²¹²⁵ R.KRSTIĆ:D4136,p.30. See also P1412,p.17; P5182,p.3. See also SIC:A.13.1(Sokolac); Sokolac Summary.

²¹²⁶ See SIC:B.16.1-B.16.2; C.21.1-C.21.3(Rogatica); Pale, Rogatica Summaries.

promoted, and his Brigade members rewarded and congratulated for their contribution to the VRS's "magnificent successes in 1992".²¹²⁷

- Duško MALOVIĆ—whose Special Police Unit was widely considered to be responsible for the killing of two Muslim families in Bijeljina in September 1992—was commended for his service by the RS Presidency.²¹²⁸
- Svetozar ANDRIĆ—who ordered the expulsion and detention of the Muslim population in Birač—was promoted by **KARADŽIĆ** in 1995.²¹²⁹
- Milenko ŽIVANOVIĆ, a key figure in forcing out the Muslim population of eastern enclaves in accordance with Directive 4,²¹³⁰ was promoted by **KARADŽIĆ** in 1995.²¹³¹
- Jovan TINTOR—who was responsible for mistreatment of detainees and other crimes in Vogošća—was appointed by **KARADŽIĆ** as a presidential advisor.²¹³²

568. On 9 January 1994, at a ceremonial Assembly session, **KARADŽIĆ** announced that "[c]ontrary to all the lies and slander of international propaganda-mongers, the Serbian army maintained the knightly character and military honour, worthy of it",²¹³³ and bestowed awards on individuals who participated in implementing the common plan,²¹³⁴ including:

- Nedeljko RAŠULA, President of the Sanski Most Municipal Assembly and CS, who hated Muslims,²¹³⁵ led a general witch-hunt against Bosnian Muslims and Bosnian Croats in Sanski Most,²¹³⁶ and in one instance oversaw the massacre of 17 Bosnian Muslim men;²¹³⁷

²¹²⁷ P6108; P2832,pp.1,4; A.DŽAMBASOVIĆ:P2828,para.120. In 1994, KUŠIĆ recommended Radisav LJUBINAC (a.k.a. "PJANO"), for promotion, citing his "exceptional bravery" during the "liberation" of Rogatica. P3287; P3407,p.31; M.UJIĆ:T.33474; P5586. *See also* Rogatica Summary.

²¹²⁸ P2978,pp.1,3. *See also* Bijeljina Summary.

²¹²⁹ P3044. *See also* Vlasenica Summary.

²¹³⁰ *See* III.C.5.(c): The strategic objectives were transformed into concrete results on the ground;

III.C.8.(i).(iii).b.iv: Directive 4.

²¹³¹ P4501.

²¹³² P5430. *See* Vogošća Summary.

²¹³³ P5525,p.10.

²¹³⁴ P5525,pp.15-19.

²¹³⁵

²¹³⁶

²¹³⁷ *See* SIC:B.17.1(Sanski Most).

- MAUZER's Panthers, a paramilitary group that participated in the brutal takeover of Bijeljina and established a detention facility to detain, interrogate, and torture Muslims;²¹³⁸
- Miroslav DERONJIĆ, who orchestrated the cleansing of Bratunac in 1992 and was reported on 6 May 1992 to be "killing all Muslims by slitting their throats" together with another Bratunac SDS representative;²¹³⁹ and
- ARK CS President BRĐANIN, whose role in the implementation of the common criminal purpose is discussed in detail above.²¹⁴⁰

569. **KARADŽIĆ** continued to rely upon such individuals to effectuate his policies, in particular: DERONJIĆ, appointed Civilian Commissioner for the Srebrenica area by **KARADŽIĆ** on 11 July 1995;²¹⁴¹ ARKAN, who returned to BiH in 1995 upon **KARADŽIĆ**'s request;²¹⁴² ŽIVANOVIĆ, as DK Commander;²¹⁴³ ANDRIĆ, as DK Chief of Staff;²¹⁴⁴ KRSTIĆ, as Chief of Staff and later DK Commander;²¹⁴⁵ and GALIĆ, as SRK Commander.²¹⁴⁶

E. Genocide

1. Introduction

570. As reflected above, under **KARADŽIĆ**'s overall authority, Bosnian Serb Forces implemented the common purpose through attacks which killed thousands, brutalised countless others and rendered many municipalities largely free of non-Serbs. These crimes were not aimed at these victims as individuals but as members of an undesired community. **KARADŽIĆ** intended the demographic restructuring of Bosnia to be accomplished by the destruction of substantial parts of the Bosnian

²¹³⁸ See Bijeljina Summary.

²¹³⁹ P1477,p.253. See also Bratunac Summary.

²¹⁴⁰ See III.C.8.(g).(vii): The ARK as an example of CS implementation of the common criminal plan.

²¹⁴¹ D2055.

²¹⁴² See III.C.8.(l): Paramilitaries/Volunteers/Serbian MUP.

²¹⁴³ P5532.

²¹⁴⁴ P3044.

²¹⁴⁵ D.KRSTIĆ:D4136,p.30; P3044.

²¹⁴⁶ See IV.D.2.(a): GALIĆ.

Muslim and Bosnian Croat communities²¹⁴⁷—as charged, the Bosnian Muslim and Bosnian Croat communities in the municipalities specified in Count 1. This intention is revealed by **KARADŽIĆ**'s statements, as well as indirect or circumstantial evidence. The proper name for this crime is genocide.

571. Article 4(2) of the Tribunal's Statute defines genocide to encompass certain acts "committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such". Thus, (a) one or more of the prohibited acts falling within Article 4(2) must be established and (b) it must be established that the act was committed with the requisite intent.²¹⁴⁸

2. The *actus reus* of genocide is satisfied

4. Proof of the underlying, prohibited act (*actus reus*) is "analytically distinct" from the intent requirement.²¹⁴⁹ Thus, although the scale of the prohibited acts may bear on intent, there is no requirement that underlying acts of genocide reach a certain scale or have any particular destructive impact on the group: there is no "numeric threshold" for Article 4(2)(a), concerning "killing members of the group";²¹⁵⁰ there is no requirement that Article 4(2)(b) acts causing "serious bodily or mental harm to members of the group", have a particular impact on the group as such;²¹⁵¹ and similarly conditions of life calculated to bring about physical destruction (Article 4(2)(c)) are met if the conditions in question (*e.g.*, deprivation of nourishment or access to medical care) are sufficiently grave.²¹⁵² Assuming that the accused has the requisite intent, it is only necessary to show that it materialised in one or more genocidal acts.²¹⁵³

572. Here, the evidence is overwhelming that genocidal acts within the meaning of Article 4(2) occurred on a massive level: thousands were killed; thousands more suffered serious bodily or mental harm as a result of being wounded, horribly beaten

²¹⁴⁷ The overall protected group is the national group of Bosnian Muslims and of Bosnian Croats. *See e.g. Krstić* AJ, para.15.

²¹⁴⁸ *Karadžić Genocide* AJ, para.22.

²¹⁴⁹ *Karadžić Genocide* AJ, para.22.

²¹⁵⁰ *Karadžić Genocide* AJ, para.23, citing T.28765; *Semanza* TJ, para.316; *Stakić* TJ, para.522. *See also Akayesu* TJ, para.521; *Sikirica* Rule 98bis Decision, para.65; *S.Milošević* Rule 98bis Decision, para.123, fn.226; *Muvunyi* TJ, para.483.

²¹⁵¹ *Akayesu* TJ, para.502; *Krstić* TJ, para.513; *Krajišnik* TJ, para.862; *ICC First Decision on Bashir Arrest Warrant*, para.119.

²¹⁵² *Karadžić Genocide* AJ, paras.48-50.

or having to live in fear for their lives, or were subjected to conditions calculated to bring about destruction in brutal and degrading detention facilities.²¹⁵⁴ All of these underlying acts, as described in detail above,²¹⁵⁵ are attributable to **KARADŽIĆ** through his participation in the overarching JCE.

3. KARADŽIĆ intended to destroy the Bosnian Muslim and Bosnian Croat communities in each of the seven identified municipalities

(a) The meaning of "intent to destroy"

573. Intent to destroy the group means the intent to cause the "physical demise" of the community.²¹⁵⁶ Thus, the intention to culturally destroy is not recognised. The physical destruction of a group, however, "is not necessarily the death of the group members".²¹⁵⁷ As Articles 4(2)(b)-(e) make clear, the intent to physically destroy a group in whole or in part can be reflected by means other than killing its members. For example, there can be no doubt that forcibly transferring all the children of the group to another group (Article 4(2)(e)), or sterilising every member of the group (Article 4(2)(d)), could reflect the intention to physically destroy the group "as such", although every individual member remains alive. Similarly, traumatising or debilitating members of the group can advance the physical demise of the group and is therefore a factor from which genocidal intent may be inferred. Equally, attacking a group's leadership can evidence an intent to physically destroy the group, although most group members are not themselves physically destroyed.

574. The "physical demise"²¹⁵⁸ of a group can be brought about by destructive acts that disrupt the characteristics that allow the group to exist or function as such, including acts that have an impact on:

- A. the capacity of group members to function normally as productive members of their society;²¹⁵⁹

²¹⁵³ *Stakić* TJ, para. 522.

²¹⁵⁴ See SICs; Municipality Summaries.

²¹⁵⁵ See III.C.6: Pattern of crimes.

²¹⁵⁶ *Krstić* AJ, paras. 28, 31, 35.

²¹⁵⁷ *Tolimir* TJ, para. 764 citing *Blagojević* TJ, para. 666.

²¹⁵⁸ *Krstić* AJ, para. 35; *Krstić* AJ, Partial Dissenting Opinion of Judge Shahabuddeen, para. 47.

²¹⁵⁹ *Tolimir* TJ, para. 755.

- B. family structures within the group;²¹⁶⁰
- C. relationships between group members;²¹⁶¹
- D. the group's ability to reconstitute itself;²¹⁶²
- E. the fabric of the group's society, including the extent to which it is affected by eradicating a group's leadership;²¹⁶³
- F. the group's relationships with other groups and with the land;²¹⁶⁴
- G. the group's history and traditions;²¹⁶⁵ and
- H. the group's houses, property and/or religious symbols.²¹⁶⁶

575. These factors—which address the impact on the group as such—make clear that the intent to physically destroy a group embraces much more than the intent to exterminate a certain number of its individual members. Each of these factors must be viewed in the context of other criminal operations against the same targeted group to properly determine its overall effect on a given population²¹⁶⁷ and thus the intent with which those acts were done. The factors must also be considered in light of the fact that the intent to destroy is limited by the circumstances presented.²¹⁶⁸ In this case, for example, **KARADŽIĆ** was obliged to close Omarska and Keraterm in the face of an international outcry in early August 1992.²¹⁶⁹

576. While forcible transfer alone does not "necessarily" constitute genocide,²¹⁷⁰ forcible transfer can be a powerful additional means—when coupled with any of the specified *actus reus*—by which to ensure the physical destruction of a group.²¹⁷¹ As emphasised by the *Tolimir* Trial Chamber, citing the *Blagojević* Trial Judgement,

²¹⁶⁰ *Krstić* AJ, paras. 28, 31; *Krstić* AJ, Partial Dissenting Opinion of Judge Shahabuddeen, para. 47.

²¹⁶¹ *Blagojević* TJ, para. 666; *Tolimir* TJ, para. 764.

²¹⁶² *Krstić* AJ, paras. 28, 31; *Tolimir* TJ, paras. 766, 781.

²¹⁶³ Final Report of the Commission of Experts for the Former Yugoslavia (S/1994/674), para. 94; *Tolimir* TJ, para. 749.

²¹⁶⁴ *Blagojević* TJ, para. 666.

²¹⁶⁵ *Blagojević* TJ, para. 666; *Tolimir* TJ, para. 764.

²¹⁶⁶ *Krstić* AJ, Partially Dissenting Opinion of Judge Shahabuddeen, paras. 53-54, 57; *Tolimir* TJ, para. 746; *Karadžić & Mladić* Rule 61 Decision, p. 53.

²¹⁶⁷ See e.g. *Tolimir* TJ, para. 765.

²¹⁶⁸ *Krstić* AJ, para. 13.

²¹⁶⁹ See III.D: **KARADŽIĆ** shared the intent for the crimes.

²¹⁷⁰ See ICJ Bosnia Judgement, para. 190; *Krstić* AJ, para. 33; *Blagojević* AJ, para. 123.

when forcible transfer is conducted in such a way that the group "can no longer reconstitute itself", the likely outcome is the physical destruction of the group.²¹⁷² This is particularly the case when the forcible transfer involves the separation of its members.²¹⁷³ Certainly, as repeatedly confirmed in ICTY case-law, forcible transfer and genocide are not mutually exclusive crimes.

577. Here, as detailed further below, virtually all factors identified above from which intent to destroy can be inferred are met.

(b) Direct evidence proves that **KARADŽIĆ** had genocidal intent

578. **KARADŽIĆ** is charged with committing genocide through his participation in the overarching JCE as the supreme leader of the Bosnian Serb political and military machinery that implemented the common purpose on the ground. Therefore, it is his genocidal intent and that of other JCE members that is determinative, not the intent of the physical perpetrators of underlying genocidal acts.²¹⁷⁴ While the determination of intent in previous ICTY cases may have turned largely, if not exclusively, on the intent that could be inferred from the underlying events that took place, there is here powerful and explicit direct evidence of **KARADŽIĆ**'s intention—and that of the other JCE members—to destroy the targeted groups in part.

579. Before the implementation of the JCE began on the ground, **KARADŽIĆ** repeatedly explained what would happen to Bosnian Muslims and Bosnian Croats if they persisted in pursuing independence. On multiple occasions, he stated that if the Bosnian Muslims and Bosnian Croats were "insane" enough to provoke the Serbs by pursuing independence, they would "disappear",²¹⁷⁵ be "annihilated",²¹⁷⁶ or "be up to their necks in blood",²¹⁷⁷ that Muslims were inviting a "highway of hell" and "possible extinction" because the "Muslim people" would not be able to defend itself.²¹⁷⁸ **KARADŽIĆ** has tried to characterise these comments—the latter in

²¹⁷¹ *Krstić* AJ, para. 31.

²¹⁷² *Tolimir* TJ, para. 764, citing *Blagojević* TJ, para. 666.

²¹⁷³ *Tolimir* TJ, para. 764, citing *Blagojević* TJ, para. 666.

²¹⁷⁴ *Karadžić Genocide* AJ, para. 79.

²¹⁷⁵ P3200, p. 2; P5846, p. 3.

²¹⁷⁶ P3200, p. 2.

²¹⁷⁷ D279, pp. 7-8.

²¹⁷⁸ D267, p. 3.

particular—as well-intended warnings of chaos rather than expressions of what he intended if he were to "release [his] tigers".²¹⁷⁹ Apart from the fact that most of these comments were made privately to his associates, and the preposterous nature of casting the crimes as beyond his control and himself as a detached, helpless observer, the evidence outlined below confirms that the destruction campaign was exactly what he intended.

580. **KARADŽIĆ** prepared his followers for the use of destructive force by casting the conflict as existential and genocidal,²¹⁸⁰ and asserting their entitlement and indeed obligation to use reciprocal force.²¹⁸¹ **KARADŽIĆ** was aware that his followers took seriously his characterisation of the looming conflict with non-Serbs as existential justifying an equivalent response.²¹⁸² His threats of Muslim or Croat "disappearance" similarly resonated among his followers. For example, **DERONJIĆ** in Bratunac threatened Muslims that they would disappear²¹⁸³ and once the implementation of the common purpose began, and many of the genocidal acts described above had taken place, **KARADŽIĆ** agreed that the conflict "was roused in order to eliminate the Muslims," and that the Bosnian Muslims were "vanishing," acknowledging an earlier comment that it was the Serbs who had been assigned to be their "executioners".²¹⁸⁴

581. Further, while expressions of direct intent must ultimately be assessed in light of the totality of the circumstances, as explained in detail below, those circumstances only confirm that **KARADŽIĆ**'s statements were direct assertions of what awaited non-Serbs at the hands of his forces. When statements reflecting genocidal intent are not followed by genocidal acts, there is no combination of acts and intent and therefore no crime. When statements reflecting genocidal intent are followed by isolated or insignificant numbers of genocidal acts, it may be difficult to link those isolated events to the genocidal intent. Here, however, the massive extent of the

²¹⁷⁹ P5779,p.5.

²¹⁸⁰ P5525,p.7; H.OKUN:P776,p.31.

²¹⁸¹ P958,p.7.

²¹⁸² D86,p.27.

²¹⁸³ P3196,paras.31-32.

²¹⁸⁴ D92,p.86. *See also* p.41. Although Miladin NEDIĆ claimed he was advocating a peaceful solution to the conflict in his "executioners" speech (*see* ██████████,paras.3,5) this is patently contradicted by the speech itself, in which he explicitly stated twice that Serbs were to be the Muslims' executioners, asserting that their "state" and "territory" depended on it so they should "not hurry" and make a mistake; NEDIĆ's contemporaneous statements indicating his opposition to reaching a peaceful solution (*see* D115,p.25 and T.45876-45877; D1379,p.103 and T.45878; P1394,p.85 and T.45879-

crimes, and their occurrence in municipality after municipality by forces under **KARADŽIĆ**'s control explicitly implementing his policies leave no doubt that the entire scope of these destructive acts effectuated his expressions of genocidal intent.

(c) Indirect evidence confirms that **KARADŽIĆ** had genocidal intent

582. The crimes unleashed against the groups clearly manifested **KARADŽIĆ**'s intent to commit genocide in each of the municipalities identified in Count 1. When multiple massacres of group members have taken place, when many if not most of the individual members have been brutalised, terrorised and traumatised,²¹⁸⁵ when the group has been simultaneously deprived of its leaders,²¹⁸⁶ when the familial, community and historical fabric binding the group and its most sacred symbols have been destroyed²¹⁸⁷ and when the group members have been physically separated and scattered,²¹⁸⁸ it is an inescapable conclusion that the very existence of the community has been intentionally attacked. That conclusion only confirms **KARADŽIĆ**'s direct expressions of genocidal intent and his clear intention that the groups not be able to reconstitute themselves.

583. While the same general pattern of crimes occurred in all of the municipalities charged in Count 1, it is instructive to focus on one to illustrate how far removed from "mere" forcible transfer this was and how clearly the underlying crimes reflect **KARADŽIĆ**'s intent to destroy the group in part. In Prijedor, up to 800 Muslim civilians were killed in the first attacks in late May²¹⁸⁹ and at least 350 more in the cleansing of the Brdo in July.²¹⁹⁰ Over 150 men were murdered in a single massacre in Keraterm in late July.²¹⁹¹ Similarly, over 150 men detained at Omarska following the Brdo cleansing were executed in the course of a single night.²¹⁹² Killings at

45881); and his extreme anti-Muslim views (*see* M.NEDIĆ:T.45864-45865,45867-45868,45869,45877,45882.

²¹⁸⁵ Above list of factors (A).

²¹⁸⁶ Above list of factors (E).

²¹⁸⁷ Above list of factors (G and H).

²¹⁸⁸ Above list of factors (B and E).

²¹⁸⁹ SIC:A.10.1; A.10.2; A.10.3(Prijedor).

²¹⁹⁰ SIC:A.10.5;A.10.6(Prijedor).

²¹⁹¹ SIC:B.15.1(Prijedor).

²¹⁹² SIC:B.15.4(Prijedor).

Omarska were so routine that prisoners feared death "every second".²¹⁹³ Approximately 200 Muslim men who survived the horrors of Omarska or Keraterm were massacred at Korićanske Stijene.²¹⁹⁴ Serb Forces raped, tortured, beat, shot or hacked to death 68 Bosnian Croats during an attack on Briševo, including 14 women, 2 minors and a number of elderly and invalid.²¹⁹⁵ In Miška Glava Dom and Ljubija football stadium, 114 non-Serbs were rounded up and detained, beaten and tortured, and a number killed;²¹⁹⁶ the rest were brought to Ljubija mine where 90 men were summarily executed.²¹⁹⁷ Meanwhile, prominent Bosnian Muslim and Bosnian Croat political leaders and other significant members of the community were targeted in an organised series of killings, their bodies dumped in mass graves.²¹⁹⁸ Thousands of men (and some women) were separated from their families and taken to Omarska and Keraterm (while women, children and the elderly were taken to Trnopolje),²¹⁹⁹ where they were starved, denied medical treatment, beaten, sexually assaulted and tortured, psychologically abused and often killed;²²⁰⁰ survivors were forcibly transferred outside RS, often outside Bosnia.²²⁰¹

584. Thus, in a matter of a few months, thousands of Prijedor's non-Serbs had been killed, thousands more brutalised, beaten, tortured, subjected to sexual violence and degraded and many thousands expelled. The groups' religious structures and symbols were destroyed or badly damaged²²⁰² and its members' livelihoods, homes and property lost. By October 1992, roughly 38,000 members of the targeted groups had been expelled from the municipality, a figure which increased to 44,000 by May 1993.²²⁰³

585. That devastating attack in Prijedor and the other municipalities unleashed a destructive impact on group members in many ways: from lingering physical and

²¹⁹³ [REDACTED]. See also K.MEŠANOVIĆ:P3528,para.29.

²¹⁹⁴ SIC:B.15.6(Prijedor).

²¹⁹⁵ SIC:A.10.9(Prijedor).

²¹⁹⁶ SIC:A.10.8;C.20.5;C.20.6(Prijedor).

²¹⁹⁷ SIC:A.10.7(Prijedor).

²¹⁹⁸ Prijedor Summary.

²¹⁹⁹ Prijedor Summary.

²²⁰⁰ SIC:B.15.1;B.15.2;B.15.3;B.15.4;B.15.5;B.15.6;C20.2;C.20.3;C20.4.

²²⁰¹ SIC.C.20.4(Prijedor); Prijedor Summary.

²²⁰² AF1086-AF1091; AF1282-AF1293; D4010,p.3; K.MEŠANOVIĆ:P3528,paras.3,67; I.ATLIJA:P3672,p.53; P.RADIĆ:P1,p.105. See SIC:D.17(Prijedor).

²²⁰³ P3852,p.2; P10,p.2; P.RADIĆ:P1,pp.74-75.

psychological debilitation²²⁰⁴ to loss of ties and connection to their previous communities.²²⁰⁵ The same destructive factors have been present in other cases recognised as genocide. The crime of persecution does not adequately capture the destructive impact on the targeted communities. **KARADŽIĆ**, well-aware of these events²²⁰⁶ and in possession of more power and ability to control them than any other individual—could only have intended the physical demise of the community. Not only can the paramount leader of the Bosnian Serbs' intent to destroy be inferred, it is compelled by the nature and extent of the underlying genocidal acts. This intent is confirmed by **KARADŽIĆ**'s own statements anticipating, threatening, and embracing just such acts.

(d) Other JCE members had genocidal intent

586. Other members of the JCE shared **KARADŽIĆ**'s genocidal intent, in particular **MLADIĆ**, the man he personally selected to command his military forces²²⁰⁷ and continued to entrust with carrying out his policies as the VRS perpetrated widespread genocidal acts.²²⁰⁸ Even after **MLADIĆ** had led the VRS in forcibly and dramatically altering Bosnia's demographics, he warned that Serbs were still under threat from Muslims and Croats, and emphasised that the answer to the threat lay in their permanent destruction. Thus, in 1994 **MLADIĆ** stated that this was an historical opportunity to create "[n]ot any kind of state, but an all-Serbian state [...] with [...] as little enemies as possible, those who could be our potential enemies, and raise against us in a few years" and explained that "[m]y concern is not that they will create the state. My concern is to have them vanish completely."²²⁰⁹ On 11 April 1994, **MLADIĆ** ordered subordinate units to "[k]eep pushing energetically onwards, pay no attention to what is going on around us. The Turks must disappear from these areas."²²¹⁰ On another occasion in 1994, **MLADIĆ** surveyed a panorama of destroyed Muslim homes in eastern Bosnia and told his companion—an ethnic Serb who had

²²⁰⁴ See e.g. [REDACTED]; KDZ017:P3568,pp.164-165; KDZ239:P3336,pp.108-109; A.ZULIĆ:P718,para.139; A.ZULIĆ:T.1037; A.MALAGIĆ:P405,p.4; G.STOJIĆ:T.19758; G.STOJIĆ:P3515,pp.29-30.

²²⁰⁵ See e.g. S.HODŽIĆ:T.18435-18436; [REDACTED]; A.MALAGIĆ:P405,pp.2-3.

²²⁰⁶ See III.D.1: **KARADŽIĆ** knew of crimes being committed in furtherance of the common purpose.
²²⁰⁷ P970,p.317.

²²⁰⁸ See e.g. AF1056-AF1059; AF1061-AF1062; AF930; AF2439.

²²⁰⁹ P1385,pp.47-49.

²²¹⁰ P1645.

emigrated to North America—to film it to show "how we took care of the Turks", further explaining that if not for the internationals, "[Muslims] would have disappeared from this area long ago."²²¹¹ As MLADIĆ explained, he routinely killed someone "in passing" when he came to Sarajevo because "who gives a fuck for them [Turks] [...] I don't know whether you kill that kind over there in Canada and America, you ought to kill these Ustasha there".²²¹²

(e) KARADŽIĆ and the other JCE members intended to destroy the parts of the groups in each of the seven identified municipalities

587. The intent to destroy "in part" "means seeking to destroy a distinct part of the group as opposed to an accumulation of isolated individuals within it."²²¹³ The accused "must view the part of the group they wish to destroy as a distinct entity which must be eliminated as such."²²¹⁴ Although the part must be substantial, *i.e.*, "significant enough to have an impact on the group as a whole",²²¹⁵ by definition this does not mean an impact on the whole significant enough to cause its destruction. Such a requirement would reflect an attack on the group "in whole" rendering the "in part" provision meaningless. Instead, the "impact on the whole" refers, for example, to demonstrating the "vulnerability and defenselessness" of the overall group.²²¹⁶ "[I]n part" also encompasses the heightened impact that results from the destruction of an "emblematic"²²¹⁷ or "strategic[ally] importan[t]" part of the group.²²¹⁸

588. Whether a part of a protected group is substantial is determined by considering (i) the numeric size of the part intended for destruction in absolute terms and in relation to the overall size of the entire group, (ii) the significance of the targeted part, including its prominence within the group and whether it is emblematic of the overall group or essential to its survival and (iii) the area of the perpetrators' activity and control, as well as the possible extent of their reach.²²¹⁹ These factors are neither

²²¹¹ P4442.

²²¹² P4442.

²²¹³ *Krstić* TJ, para. 590.

²²¹⁴ *Krstić* TJ, para. 590.

²²¹⁵ *Krstić* AJ, para. 8.

²²¹⁶ *Krstić* AJ, para. 16.

²²¹⁷ *Krstić* AJ, para. 12, 16.

²²¹⁸ *Krstić* AJ, para. 15.

²²¹⁹ *Krstić* AJ, paras. 8, 12-13. *See also Tolimir* TJ, para. 749; *Brdanin* TJ, paras. 701-703.

exhaustive nor dispositive; their applicability and relative weight will vary depending on the circumstances of the case.²²²⁰

589. The targeted communities within the municipalities specified in Count 1 were not random aggregations of individuals—they were each "distinct entit[ies]"²²²¹ with specific histories, attachments and identities, developed over centuries.²²²² The BSL itself recognised the distinct nature of municipalities in its plans for implementing ethnic division, particularly Variant A/B. While each community was a relatively small percentage numerically of the overall groups of Bosnian Muslims and Bosnian Croats, a pure statistical assessment belies the inevitable impact of the physical demise of such a distinct community on the overall group. No one, for example, could plausibly suggest that the destruction of a community of 50,000 people of the same nationality, even in a far more populous country than Bosnia and Herzegovina, would not "serve as a potent example"²²²³ of the overall group's vulnerability. This is particularly so if, as here, the perpetrator simultaneously targeted for destruction multiple other communities within the same national group, further compounding the impact of each community's destruction on the group as a whole. The power of that "example" on the overall group is even clearer if the same ratio of destruction is transposed to larger countries. The Muslim community of Prijedor or Zvornik targeted for destruction in 1992 represented approximately 2.6% of the pre-war Bosnian Muslim population of BiH.²²²⁴ This would translate to a municipal area of approximately 1.7 million people in France, 2.1 million in Germany, or 8.1 million people in the United States, given their populations.

590. Moreover, the impact on the overall group is further heightened by the strategic importance or emblematic nature of the group. In terms of the former, the *Krstić* Appeals Chamber emphasised that Srebrenica (and the surrounding Central Podrinje region) was of "immense strategic importance" to the BSL because control over the Srebrenica region was essential to their goal of a viable political entity in

²²²⁰ *Krstić* AJ, para. 14.

²²²¹ *Krstić* TJ, para. 590.

²²²² P2001; A.RIEDLMAYER:P4070, pp.65-69; Nusret.SIVAC:P3478, p.6;

²²²³ *Krstić* AJ, para. 16.

²²²⁴ The total pre-war Bosnian Muslim population was approximately 1,900,000 (43.7% of 4,354,911: *See* P783). Pre-war Prijedor had 49,351 Muslims (*see* Prijedor Summary) while Zvornik had 48,102 (*see* Zvornik Summary).

Bosnia.²²²⁵ Yet that importance was no different for the other communities in the region that had already been targeted; indeed, Srebrenica was comprised in part of Bosnian Muslims who had survived the destructive acts targeting their communities in Vlasenica, Bratunac and Zvornik.²²²⁶ On the other side of the country, in the northwest, the same strategic significance for the same underlying reasons applied to Prijedor, Sanski Most and Ključ.²²²⁷

591. Applying the substantiality factors to just one of the Count 1 specified municipalities, the numeric size of the Bosnian Muslim population in Prijedor in 1991 was nearly 25% larger than the Bosnian Muslim population in Srebrenica at the time of the 1995 genocide which was found to meet the substantiality requirement based on all the circumstances.²²²⁸ In addition, more than 6,000 Bosnian Croats lived in Prijedor.

592. Furthermore, as with Srebrenica, the Bosnian Muslim and Bosnian Croat communities in Prijedor were both strategically important (discussed above) and prominent within, and emblematic of, the larger groups. Prijedor itself and the Bosnian Muslim and Bosnian Croat communities living there symbolised WWII throughout the region;²²²⁹ and for **KARADŽIĆ** and the BSL, in particular, these populations symbolised WWII sufferings and victimisation of Serbs. In negotiations, **KARADŽIĆ** claimed Prijedor on the basis of the 1931 census—when internationals told him it was history, he asserted: "That is not a history. This is a continuation of the World War Two."²²³⁰ As Prime Minister LUKIĆ stated, "after the crimes that were committed in 1941 [...] it was a given that Prijedor had to be in Serbian hands."²²³¹ Similarly, Prijedor SDS Municipal Board President Simo MIŠKOVIĆ claimed that the Serbs were "forced" to take over Prijedor due to fear resulting from events in WWII.²²³²

²²²⁵ *Krstić* AJ, para. 15.

²²²⁶ *See* Podrinje Summary.

²²²⁷ *See* III.C.5.(a): The strategic objectives as articulated at the 16th Assembly; Prijedor, Sanski Most, Kjuč Summaries.

²²²⁸ *Compare* *Krstić*, para. 15 with P6684, pp. 1-2(B/C/S).

²²²⁹ M.MUJADŽIĆ: P3703, p. 15.

²²³⁰ P6164, p. 32.

²²³¹ V.LUKIĆ: T.38783-38784. *See also* V.LUKIĆ: T.38797.

²²³² S.MIŠKOVIĆ: T.45378-45379. *See also* B.MANDIĆ: T.45790-45792.

593. Moreover, Prijedor was the symbol throughout the region of Yugoslavia²²³³ of "brotherhood and unity".²²³⁴ Thus, the targeting of the Bosnian Muslims and Bosnian Croats of Prijedor represented an attack on the very concept that the BSL insisted had to be replaced with ethnic division.

594. These factors combined to make Prijedor emblematic of the overall group—the destruction of the groups in Prijedor sent a potent message of "vulnerability and defenselessness"²²³⁵ to the Bosnian Muslims and Bosnian Croats. Just as the destruction of the desperate holdouts in Srebrenica served as an example to the overall group at the end of the war, the physical demise of the Prijedor Muslim and Croat communities, among others, served as an example in the relatively early stages of the war that "brotherhood and unity" was dead and a new order was being imposed that the overall group should not attempt to withstand.

595. In conclusion, the requisite combination of acts and intent are fulfilled here and **KARADŽIĆ**'s responsibility for the crime of genocide has been established.

F. KARADŽIĆ significantly contributed to the common criminal purpose

596. As the paramount military and political leader in the RS, **KARADŽIĆ** stood at the apex of Bosnian Serb power structures that he and his fellow JCE members built and used to achieve their common criminal objective. As such, he was the guiding figure behind the common purpose, making significant and leading contributions to it from its inception.

597. **KARADŽIĆ** led the JCE in translating its members' pro-Serb chauvinistic ideology into SDS and governmental policies designed to further the permanent forcible removal of Muslims and Croats from Serb-claimed territories.²²³⁶

²²³³ M.MUJADŽIĆ:P3703,p.16.

²²³⁵ *Krstić* AJ,para.16.

²²³⁶ See III.B.1-4: The goal of ethnic separation; Territorial aspirations of the BSL; Population movement was essential to achieve the common purpose; Crimes were an essential part of the achievement of the common purpose; III.C.1-5,8: Preparations to create a Serb-dominated state within Bosnia; Variant A/B; Countdown to war; The municipality takeovers; The strategic objectives as articulated at the 16th Assembly; Organs used by **KARADŽIĆ** and other JCE members to implement the common criminal purpose. Indictment para.14(a).

KARADŽIĆ disseminated propaganda intended to foment Serb fear and hatred of Muslims and Croats, encouraging his subordinates to follow his example.²²³⁷

598. **KARADŽIĆ** was the key figure in creating the power structures that would transform policy into action. He led the transformation of SDS bodies into RS state structures²²³⁸ and remained the undisputed leader of the SDS throughout the Indictment period.²²³⁹ **KARADŽIĆ** laid the groundwork for the ethnic division of the SRBiH MUP and, together with fellow JCE members, created the RS MUP.²²⁴⁰ He initiated and oversaw the creation of CSs in the charged municipalities,²²⁴¹ and instructed them in their preparation for the takeovers.²²⁴² **KARADŽIĆ** led the formation of the RS Government and Presidency,²²⁴³ ordered the formation of TO brigades,²²⁴⁴ and oversaw the pre-war arming of Bosnian Serbs.²²⁴⁵ He also played a central role in the VRS's creation, including choosing MLADIĆ as its Commander.²²⁴⁶ **KARADŽIĆ** dominated these organs throughout the Indictment period.²²⁴⁷ He maintained a central role in the Assembly,²²⁴⁸ controlled the Government and its ministries,²²⁴⁹ supervised CSs,²²⁵⁰ commanded the VRS and TO²²⁵¹ and controlled the NSC and Presidency.²²⁵² He guided and directed the actions of each of these organs as they furthered the common purpose.²²⁵³

²²³⁷ See III.B.1-3: The goal of ethnic separation; Territorial aspirations of the BSL; Population movement was essential to the common purpose; III.C.1: Preparations to create a Serb-dominated state within Bosnia. See also Brief, para. 188. Indictment para. 14(c).

²²³⁸ See III.C.2-3: Variant A/B; Countdown to war. Indictment para. 14(b).

²²³⁹ See III.C.8.(a).(ii): **KARADŽIĆ**'s authority over the SDS.

²²⁴⁰ See III.C.8.(h).(i): Creation of the RSMUP. Indictment para. 14(b).

²²⁴¹ See III.C.2: Variant A/B; III.C.8.(g): CSs/War Presidencies/War Commissions. Indictment para. 14(b).

²²⁴² See III.C.8.(g): CSs/War Presidencies/War Commissions. See also III.C.2-3: Variant A/B; Countdown to war. Indictment para. 14(a),(d),(e).

²²⁴³ See III.C.8.(b): Government; III.C.8.(d): National Security Council (NSC); III.C.8.(e): Presidency. Indictment para. 14(b).

²²⁴⁴ See III.C.8.(k): TO. Indictment para. 14(b).

²²⁴⁵ See III.C.8.(a).(iii): The SDS implemented the common criminal plan. Indictment para. 14(b),(e).

²²⁴⁶ See III.C.8.(i): VRS. Indictment para. 14(b).

²²⁴⁷ See III.C.8.(a).(ii): **KARADŽIĆ**'s authority over the SDS; III.C.8.(b): Government; III.C.8.(d): National Security Council (NSC); III.C.8.(e): Presidency; III.C.8.(f): Assembly; III.C.8.(g).(vi): **KARADŽIĆ**'s authority and control over CSs; III.C.8.(h).(vi): **KARADŽIĆ**'s authority and control over the RSMUP; III.C.8.(i).(iii): **KARADŽIĆ**'s command and control authority over the VRS; III.C.8.(k): TO. Indictment para. 14(b).

²²⁴⁸ See III.C.8.(f): Assembly.

²²⁴⁹ See III.C.8.(b): Government; III.C.8.(h).(vi): **KARADŽIĆ**'s authority and control over the RSMUP. See also III.C.8.(h)(i): Creation of the RSMUP; III.C.8.(b): Government; III.C.8.(h): RSMUP.

²²⁵⁰ See III.C.8.(g).(vi): **KARADŽIĆ**'s authority and control over CSs.

²²⁵¹ See III.C.8.(i).(iii): **KARADŽIĆ**'s command and control authority over the VRS; III.C.8.(k): TO.

599. By liaising with MILOŠEVIĆ and other Serb and Bosnian Serb leaders, **KARADŽIĆ** also obtained, facilitated and encouraged the participation of JNA forces in arming Serbs and in municipal takeovers, and ensured continued support from the JNA/VJ after its formal withdrawal from BiH in May 1992.²²⁵⁴ Moreover, **KARADŽIĆ** coordinated with Jovica STANIŠIĆ, ARKAN, ŠEŠELJ and others to ensure and oversee the participation of Serb paramilitaries in pursuit of the common purpose and encouraged their participation.²²⁵⁵

600. Throughout the Indictment period **KARADŽIĆ** formulated, approved, and disseminated policies, instructions and orders that furthered the common criminal purpose.²²⁵⁶ Examples include his roles in: creating and disseminating the policy of forcible ethnic separation;²²⁵⁷ formulating and disseminating the strategic objectives;²²⁵⁸ formulating and approving VRS Directives;²²⁵⁹ approving and implementing the system of detention and "exchange" through which thousands of non-Serbs were mistreated, killed and expelled;²²⁶⁰ and directing and authorising the restriction of humanitarian aid to the Eastern enclaves in an effort to create unbearable living conditions.²²⁶¹

601. **KARADŽIĆ** failed to prevent or punish the systematic crimes committed during the municipal takeovers and subsequent operations by his civilian and military

²²⁵² See III.C.8.(d): National Security Council (NSC); III.C.8.(e): Presidency.

²²⁵³ Indictment para.14(a),(d),(e).

²²⁵⁴ See III.C.8.(j): JNA/VJ. See also III.C.8.(a).(iii): The SDS implemented the common criminal plan. Indictment para.14(f).

²²⁵⁵ See III.C.8.(l): Paramilitaries/Volunteers/Serbian MUP. See also III.B.5.(h): Jovica STANIŠIĆ; III.B.5.(j): Željko RAŽNATOVIĆ, a.k.a. ARKAN; III.B.5.(k): Vojislav ŠEŠELJ. Indictment para.14(f),(h).

²²⁵⁶ See e.g. III.B.1-4: The goal of ethnic separation; Territorial aspirations of the BSL; Population movement was essential to achieve the common purpose; Crimes were an essential part of the achievement of the common purpose; III.C.5.(a): The strategic objectives as articulated at the 16th Assembly; III.C.8.(i).(iii).a: **KARADŽIĆ**'s strategic direction to the VRS; III.C.8.(i).(iii).b: Directives; III.D.2: **KARADŽIĆ** failed to prevent common purpose crimes or punish the perpetrators; Indictment para.14(a),(d),(e),(j).

²²⁵⁷ III.B.1-4: The goal of ethnic separation; Territorial aspirations of the BSL; Population movement was essential to achieve the common purpose; Crimes were an essential part of the achievement of the common purpose. Indictment para.14(a),(d),(e).

²²⁵⁸ III.C.5.(a): The strategic objectives as articulated at the 16th Assembly; III.C.8.(i).(iii).a: **KARADŽIĆ**'s strategic direction to the VRS. Indictment para.14(a),(d),(e).

²²⁵⁹ III.B.4.(c): **KARADŽIĆ**'s orders, directions and guidance evidence the common criminal purpose; III.C.8.(i).(iii).b: Directives.

²²⁶⁰ III.C.8.(c): Exchange Commission. Indictment para.14(a),(d),(e).

²²⁶¹ Section III.B.4.(c): **KARADŽIĆ**'s orders, directions and guidance evidence the common criminal purpose; III.C.8.(i).(iii).b: Directives. Indictment para.14(a),(d),(e),(j).

subordinates.²²⁶² Moreover, he sought to deny those crimes, justify them, and/or mislead the international community and media as regards the role that Serb Forces had played in them.²²⁶³ In so doing, **KARADŽIĆ** created an environment of impunity, through which he encouraged the ongoing implementation of the common criminal purpose²²⁶⁴ and utterly failed to protect the non-Serbs living in areas under his forces' control.²²⁶⁵

IV. KARADŽIĆ WAS A MEMBER OF THE JCE TO SPREAD TERROR AMONG THE CIVILIAN POPULATION OF SARAJEVO THROUGH SNIPING AND SHELLING

A. Overview

602. As the supreme military and political leader of the Bosnian Serbs, **KARADŽIĆ** was a key participant in a JCE to spread terror among the civilian population of Sarajevo through a sniping and shelling campaign principally implemented by SRK forces.

603. During the 44-month campaign of sniping and shelling, Bosnian Serb Forces carried out widespread sniping of civilians engaged in civilian activities and launched tens of thousands of shells and bombs into Sarajevo which were often directed at populated residential areas or had no target, frequently as retaliation for BiH military or political actions or to leverage negotiations. The impact of the sniping and shelling campaign was amplified by restrictions on humanitarian aid and utilities that forced residents to expose themselves to attacks when searching for fuel for heating or cooking; or queuing for water or food. The campaign killed thousands of civilians,

²²⁶² See III.D.2: **KARADŽIĆ** failed to prevent common purpose crimes or punish the perpetrators. Indictment para.14(a),(g),(h).

²²⁶³ See III.B.4: Crimes were an essential part of the achievement of the common purpose; III.D: **KARADŽIĆ** shared the intent for the crimes. Indictment para.14(a),(g),(h),(i).

²²⁶⁴ See III.B.4.(b): **KARADŽIĆ**'s response to the crimes evidences the common criminal purpose. See also III.C.8.(h).(iv)-(v),(vii): Non-punishment of RSMUP perpetrators for crimes against non-Serbs; RS MUP failure to protect non-Serbs or investigate crimes against them; **KARADŽIĆ** rewarded and commended RS MUP personnel; III.D.2: **KARADŽIĆ** failed to prevent common purpose crimes or punish the perpetrators. Indictment para.14(a),(d),(g),(h).

²²⁶⁵ Indictment para.14(g). See *Rutanagira* TJ, paras.78-79. See e.g. *Martić* TJ, para.498; *Bagilishema* TJ, para.665. See also *Mrkšić* AJ, para.151; *Orić* TJ, para.304; *Krajišnik* TJ, para.1159; *Halilović* TJ, para.82; *Stanišić and Župljanin* TJ, paras.489,518.

injured countless others, caused vast damage to Sarajevo's infrastructure, and terrorised its civilian population.

604. Terror was the primary purpose of the shelling and sniping campaign, as evidenced by its duration and intensity, its application and modulation as a political tool, and its almost exclusive focus on targeting civilians and civilian objects. The nature and pattern of sniping and shelling attacks against civilians (exemplified by Schedules F and G), the strict command and control of SRK snipers, mortars and other artillery, the longevity of the campaign, and the personal involvement of **KARADŽIĆ** and **MLADIĆ** in Sarajevo events, make clear that the campaign resulted from a common criminal plan emanating from the top of the Bosnian Serb political and military hierarchy. Apart from **KARADŽIĆ**, members of the JCE included **MLADIĆ**, **GALIĆ**, **D.MILOŠEVIĆ**, and other members of the Presidency, all of whom intended that the crimes of terror, unlawful attacks against civilians and murder be committed in furtherance of the JCE.

605. During this entire period, **KARADŽIĆ** had ultimate control over the VRS and other Bosnian Serb Forces engaged in the shelling and sniping campaign in Sarajevo. Had he wanted to end the campaign of terror, he could have done so. Instead, he used terror as a tool, modulating the violence against the civilian population in accordance with the BSL's political and strategic interests. **KARADŽIĆ** recruited **MLADIĆ**, who marked his arrival to the Sarajevo theatre in May 1992 with the immediate intensification of the terror campaign. **KARADŽIĆ** allowed the campaign to continue for almost four years while denying or deflecting international protests and failing to take any genuine steps to punish the perpetrators.

B. The JCE to spread terror

1. The common purpose

606. **KARADŽIĆ** and other JCE members (including **MLADIĆ**, **GALIĆ** and **MILOŠEVIĆ**) all shared the common purpose of establishing and carrying out a campaign of sniping and shelling against the civilian population of Sarajevo, the primary purpose of which was to spread terror among the civilian population, and involving the crimes of terror, unlawful attacks on civilians and murder ("Terror JCE").

607. The common purpose arose in April 1992, as the sniping and shelling campaign began. As detailed below,²²⁶⁶ the sniping and shelling attacks against civilians of Sarajevo continued for the next 44 months. The campaign abated and flared in response to outside pressure or to exploit perceived opportunities, but was never abandoned. The campaign, and thus the common purpose, ended in November 1995 with the end of hostilities in BiH.

608. The primary purpose of the campaign was obvious to those who observed it, and is the only conclusion that can be drawn from many months of attacks on civilians with very little effect other than to create and sustain an environment of terror.²²⁶⁷

609. **KARADŽIĆ** and other JCE members used the terror caused by the sniping and shelling campaign as leverage in negotiations;²²⁶⁸ as retaliation for military action by the ABiH within Sarajevo or elsewhere;²²⁶⁹ to otherwise put pressure on the Bosnian government; and to weaken the will of the Muslim population.²²⁷⁰ The campaign also furthered the blockade of Sarajevo, perpetuated the ethnic division

²²⁶⁶ See IV.E.2.(a)-(c).

²²⁶⁷ [REDACTED]:P6060,pp.13,1416; [REDACTED]; KDZ185:T.4178; KDZ450:P5906,paras.68; [REDACTED]:T.13038-13039,13051,13093; M.ROSE:T.7267; A.VANBAAL:P1818,paras.48-49; D.FRASER:P1762,p.5; D.FRASER:T.8018,8030-8031; P.BRENNKAG:P1851,para.62; D.HARLAND:P820,paras.32-35,41,219,291; D.HARLAND:T.2018,2020,2023,2351; R.SMITH:T.11333-11334; H.KONINGS:P1953,para.35,43; A.VANLYNDEN:P926,para.25; P897,p.4; A.BANBURY:P2451,paras.197,199,202. A.BANBURY:T13330; M.ROSE:T.7267; [REDACTED]; P.TUCKER:P4203,para.4490; J.BOWEN:T.10213-10214 P1265,p.6;

AF137.

²²⁶⁸ R.DONIA:P973,pp.71-81; D568,p.3; D.HARLAND:P820,paras.35-36,41,45,53,63,155,270-271,300; R.MOLE:P1426,paras.91-96,116; [REDACTED]:P5906,paras.25-26,48,140; M.BELL:P1996,para.60; M.BELL:T.9769-9770; J.BOWEN:T.10105; A.BANBURY:T.13310-13312; A.VANLYNDEN:P926,para.22; M.ROSE:P1638,paras.28,197,199; P.TUCKER:P4203,para.49; A.BANBURY:P2451,para.200.

²²⁶⁹ [REDACTED]:P5906,paras.28,37,70,141; [REDACTED]:T.10550-10551,10571-10573; [REDACTED],4318; D.HARLAND:P820,paras.171,203,214,290-292; P2257,p.3; P1429; P1433; P1434; P896,p.2; P2455,p.4; P.TUCKER:P4203,paras.82-86,90-91,295; J.BOWEN:T.10105; R.MOLE:P1426,paras.91-96,105; R.MOLE:T.5912; A.BANBURY:P2451,paras.197,199; A.BANBURY:T.13330;P.TUCKER:P4203,paras.82-85,91,95

²²⁷⁰ D.HARLAND:P820,para.63; [REDACTED]; H.OKUN:P776,p.70; M.ROSE:P1638,para.199; J.BOWEN:P2068,para.20; J.BOWEN:T.10105; A.BANBURY:P2451,paras.73,197; M.ROSE:T.7267; P1265,p.6; P.TUCKER:P4203,paras.44,82-85,90-91,295; J.BOWEN:T.10213-10214; A.VANBAAL:[REDACTED]para.50.

KARADŽIĆ and others had accomplished in the city by May 1992,²²⁷¹ and made it impossible for the BH government to properly function.²²⁷²

2. Crimes within the common purpose

610. The common purpose encompassed the crimes charged in Counts 5, 6, 9 and 10 of the Indictment: terror, unlawful attacks against civilians and murder. As detailed below, and in the Appendices for Schedules F and G, the Prosecution has proven beyond a reasonable doubt the elements for each crime,²²⁷³ the chapeau elements for Articles 3 and 5,²²⁷⁴ and **KARADŽIĆ**'s individual criminal responsibility.²²⁷⁵

611. Contrary to **KARADŽIĆ**'s claim, the crime of terror is established in customary international law.²²⁷⁶

C. **KARADŽIĆ contributed to and shared the common purpose of the terror JCE**

612. **KARADŽIĆ** worked together with the other JCE members to implement the common criminal purpose of spreading terror through a campaign of shelling and sniping. In particular, **KARADŽIĆ**:

1. Oversaw as Supreme Commander the strategy and implementation of the campaign;²²⁷⁷
2. Modulated the level of terror through the shelling and sniping campaign and restrictions on humanitarian aid and utilities in accordance with the BSL's strategic and political interests;²²⁷⁸
3. Denied and deflected international criticism;²²⁷⁹

²²⁷¹ P781; P1379,pp.14-15,63; P1390,pp.70,71; R.DONIA:P973,pp.58,71-77,80-81; P1379,pp.14-15; P1383,pp.128-129; P1419,p.104; P1485,p.164; P1484,pp.53-54,59; P1473,pp.168-169; H.OKUN:P776,pp.63-64,108; D2149,p.17.

²²⁷² P956,p.10; D92,p.16; P969,p.6; P1383,p.129.

²²⁷³ *D.Milošević* AJ,paras.31-37,57; *Galić* AJ,paras.102,104(elements for terror); *D.Milošević* AJ,paras.57,60; *Strugar* AJ,paras.270-271; *Galić* AJ,fn.411(elements for unlawful attacks against civilians). See III.B.4.

²²⁷⁴ See III.B.4. For crimes against humanity, they were committed as part of a widespread or systematic attack directed against the civilian population of Sarajevo. See Indictment,para.88.

²²⁷⁵ See VII.

²²⁷⁶ *D.Milošević* AJ,para.30; *Galić* AJ,paras.86,98. *Contra Karadžić* Pre-Trial Brief, paras.24-25.

²²⁷⁷ Indictment, para.14(a),(b),(d),(e) and para.19. In relation to para.14(f), as discussed below, **KARADŽIĆ** controlled and/or cooperated with Serb Forces including the RSMUP, TO, JNA and paramilitaries in establishing and implementing the early stages of the campaign. See IV.E.2.(a).

4. Brought in MLADIĆ and approved his intensification of the terror campaign;²²⁸⁰
5. Allowed the campaign to continue, despite his awareness of its illegality and devastating effect on civilians and his demonstrated ability to halt it;²²⁸¹ and
6. Promoted and rewarded key implementers of the campaign.²²⁸²

613. He therefore made a significant contribution to, and shared the common criminal purpose of, the Terror JCE.

1. KARADŽIĆ's command and control over Bosnian Serb Forces in Sarajevo

614. **KARADŽIĆ** was at the apex of control of the Bosnian Serb Forces,²²⁸³ including those in Sarajevo.²²⁸⁴ He repeatedly claimed such authority²²⁸⁵ and was uniformly recognized as having such authority by his own subordinates and international observers.²²⁸⁶ When **KARADŽIĆ** wanted the shelling and sniping to stop, it did.²²⁸⁷

615. **KARADŽIĆ's** powers stemmed from his position as President of the SDS, President of the Presidency, sole President and Supreme Commander.²²⁸⁸ He exerted this control over the SRK in Sarajevo by planning and directing military operations;²²⁸⁹ determining military tasks, military and political strategy for the SRK

²²⁷⁸ Indictment, para.14(a),(d),(e),(j) and para.19.

²²⁷⁹ Indictment, para.14(a),(c),(d),(i) and para.19.

²²⁸⁰ Indictment, para.14(a),(b),(d) and para.19.

²²⁸¹ Indictment, para.14(d),(h) and para.19.

²²⁸² Indictment, para.14(d),(h) and para.19.

²²⁸³ See III.C.8.(i). See also M.MILOVANOVIĆ:T.25518-25519; M.ROSE:T.7596; P1684; C.DOYLE:P918,pp.34-35; A.BANBURY:P2451,para.212.

²²⁸⁴ S.GALIĆ:T.37598; D.MILOŠEVIĆ:T.33108; M.MILOVANOVIĆ:T.25477-25478,25480-25481; P846/P3053(duplicates).

²²⁸⁵ P1388,pp.85-86.

²²⁸⁶ A.BANBURY:T.13313,13349-13350; M.ROSE:P1638,para.207; P2459:V000-3179;

M.MILOVANOVIĆ:T.25477-25478,25480-25481; P846/P3053(duplicates); S.GALIĆ:T.37594.

²²⁸⁷ D.HARLAND:P820,paras.64,77-78,125,133; D.HARLAND:T.2096-2097; [REDACTED]; D.FRASER:P1762,p.41; M.ROSE:P1638,paras.45,141; A.BANBURY:P2451,para.50;

A.VANLYNDEN:P926,para.143.

²²⁸⁸ See III.C.8.(b).1.

²²⁸⁹ 1992: P1478,pp.166-175; [REDACTED] P991; P2023; P1499;

[REDACTED] July 1993: D2149,p.26; December 1993-January

1994: M.MILOVANOVIĆ:T.25547-24459; P2019:V000-0800; P4925; P1484,pp.53-59;

D2149,pp.26,33-35; P3052; P5989.

forces and Serb municipality organs and authorities in the Sarajevo area;²²⁹⁰ and through his orders to, and frequent personal contacts with, MLADIĆ, members of his VRS-GŠ and SRK commanders (discussed in more detail below).²²⁹¹ **KARADŽIĆ** appointed or promoted each SRK commander.²²⁹²

616. Apart from his broad strategic control,²²⁹³ **KARADŽIĆ** issued specific tactical orders to Bosnian Serb Forces in Sarajevo.²²⁹⁴

617. Illustrations of **KARADŽIĆ**'s powers over the sniping and shelling campaign, include:

- Shelling and sniping ceased when **KARADŽIĆ** committed Bosnian Serb Forces to cease-fire agreements²²⁹⁵ which halted the shelling or sniping.²²⁹⁶
- **KARADŽIĆ** gave specific orders to military commanders to cease firing.²²⁹⁷ For example, after expressions of outrage from parties including the SG and UNSC related to the city-wide bombardment at the end of May 1992 (G1), **KARADŽIĆ** called MLADIĆ to stop the bombardment.²²⁹⁸
- **KARADŽIĆ** also controlled firing during specific individual moments or in specific locations. For example, **KARADŽIĆ** instructed MLADIĆ and GALIĆ to ensure that an UNPROFOR football match could safely proceed without sniping or shelling.²²⁹⁹

²²⁹⁰ P1484,pp.133-134; P1004; P1005; P1006/P5060(duplicates). *See also* D324; P5049; P5065; P6297; P5053; P1478,pp.92-93; P1477,p.347.

²²⁹¹ P1388,p.253; P2683; [REDACTED] M.GAGOVIĆ:T.31910-31911; P1508; P2685; P1481,pp.141-144; D456,p.19; P5044; P4796; P4800; D4507; P4799; D4511; D4513; D4512; P4783; P4806; P4805; D3872; P4803; P4804; P4802; D3871; P4786; D4508; P4801; P4807.

²²⁹² [REDACTED] P1478,pp.279-280; [REDACTED] P2649; P2678; P2676; P2677; D2149,p.24.

²²⁹³ *See* III.C.8.(i).

²²⁹⁴ P1379,p.255; P1412,p.13; A.VANBAAL:P1818,para.21-30; A.VANBAAL:T.8535-8536; P5066; P5042; P4783; P4807; P2661; [REDACTED]; D331; P2680; P5742,pp.3-4. *See also* P2691; P2679; P2681; P2680.

²²⁹⁵ D920,p.2; M.ROSE:P1638,para.64; D.HARLAND:P820,paras.43,64,79,125,133; D.HARLAND:T.2018-2020; F.THOMAS:P1558,paras.97,100,105,107; [REDACTED]:T.4216-4218; [REDACTED]; P2664; P4798; P4799; D2149,p.28. *See* IV.C.2.

²²⁹⁶ D.HARLAND:P820,paras.82-86; P827; M.ROSE:P1638,para.45; A.VANLYNDEN:P926,paras.139,143; F.THOMAS:P1558,para.107.

²²⁹⁷ P1504; P4802; P4804,pp.1-3; D920,p.2; P5702; P1478,pp.238-241; D431; P1481,p.48. *See also* P1270; D4506; P4796; D4507; P2664; P4798; P4799; D2149,p.28.

²²⁹⁸ P1036. *See also* IV.E.2.(a)(i).

²²⁹⁹ M.ROSE:P1638,para.64; P1643.

- He issued orders regarding deployment and use of military units and assets – including heavy artillery – around Sarajevo.²³⁰⁰ For example, on 7 February 1994, **KARADŽIĆ** ordered "uncontrolled shelling" to cease in the wake of international condemnations surrounding G8, saying he was to be personally informed of every incident.²³⁰¹ This was described by MILOVANOVIĆ as showing **KARADŽIĆ**'s direct command and control over the SRK corps and brigade commanders pursuant to "the power of the supreme commander."²³⁰²

618. **KARADŽIĆ** was recognised, both at the time and in retrospect, as the undisputed ultimate Bosnian Serb military decision-maker in Sarajevo (and the entire RS). Such acknowledgements came from within the VRS by MLADIĆ,²³⁰³ MILOVANOVIĆ,²³⁰⁴ GALIĆ,²³⁰⁵ MILOŠEVIĆ²³⁰⁶ and others.²³⁰⁷ GALIĆ affirmed that he sometimes received orders directly from **KARADŽIĆ**.²³⁰⁸ The subordination and general deference of the military to **KARADŽIĆ** was also observed by international observers during the conflict, who recorded it contemporaneously and testified to it before this Trial Chamber.²³⁰⁹

619. Finally, in light of his position as Supreme Commander and the normal and functioning military reporting chain, **KARADŽIĆ** received regular military reports on the situation in and around Sarajevo.²³¹⁰ **KARADŽIĆ** also personally received reports from, and was briefed by, SRK officers including the Commander and Chief

²³⁰⁰ P1479,pp.107-108; D456,p.51; P4806; P.TUCKER:P4203,para.69; D.HARLAND:P820,p.77,para.250; D2149,p.9; P1261; P1036; P1481,p.59; P1425,p.10; P5054; P4804; P5056; D.HARLAND:P820,para.250; P1820. D3384.

²³⁰¹ P846/P3053(duplicates). *See also* P4493; Brief,para.625.

²³⁰² M.MILOVANOVIĆ:T.25477-25478.

²³⁰³ P1040,p.2; J.WILSON:P1029,paras.77-78,127,132-137; J.WILSON:T.3924-3926; P1043,p.2; P970,p.344; P5663,pp.10,26.

²³⁰⁴ M.MILOVANOVIĆ:T.25477-25478; P846/P3053(duplicates).

²³⁰⁵ S.GALIĆ:T.37598.

²³⁰⁶ D.MILOŠEVIĆ:T.33089-33090.

²³⁰⁷ [REDACTED].

²³⁰⁸ S.GALIĆ:T.37193,38030,38033.

²³⁰⁹ D.HARLAND:T.2029-2030; H.OKUN:P776,pp.51-52; H.OKUN:T.1511-1513; A.BANBURY:P2451,paras.200-201,209,212; M.ROSE:P1638,paras.205, 206; M.ROSE:T.7262; 7596; P1641; P1684; C.DOYLE:P918,pp.34-35.

²³¹⁰ D428; [REDACTED] *See also* S.VELJOVIĆ:T.29241-29243; P1647; P5943; P1646; P1663; D3277; D625; D730; P879; P6575; P2138; D2015; P1646; P1663; D625; D730; P879; P6575; P2138; D2015. *See also* D2313; AF35.

of Staff.²³¹¹ **KARADŽIĆ** also made field visits to SRK units and personnel in the Sarajevo theatre.²³¹²

2. **KARADŽIĆ** modulated the campaign of terror

620. Throughout the JCE time period, **KARADŽIĆ** modulated the level of terror on the civilian population of Sarajevo through his control over the sniping and shelling campaign. He thereby used terror as a tool to force the BiH government to concede to Serb peace terms or to negotiate;²³¹³ to leverage negotiations;²³¹⁴ or as retaliation for actions elsewhere in the theatre.²³¹⁵ By contrast, he ratcheted the terror down when under sufficient pressure, such as the threat of Western military intervention.²³¹⁶ It was, in the words of one international, "high-intensity gangsterism."²³¹⁷

621. For example, in a meeting with SMITH on 5 April 1995, **KARADŽIĆ** warned that an imminent Bosnian offensive to open a land corridor to Sarajevo would mean that "we will take Sarajevo," threatening to use weapons they had not yet used.²³¹⁸ Just one day later, MILOŠEVIĆ ordered a MAB attack at the centre of Hrasnica (G10),²³¹⁹ which was reported to **KARADŽIĆ** that same night.²³²⁰ This was part of a more general pattern of **KARADŽIĆ** attacking civilians in Sarajevo in response to ABiH military offensives attempting to break the siege or elsewhere throughout the country.²³²¹ Indeed, at a meeting with Generals JANVIER and SMITH on 30 April 1995, **KARADŽIĆ** made explicit his view that "retaliation is productive. When they shell Doboj and we retaliate, it's effective."²³²²

²³¹¹ P1481,pp.141-144; P5043,p.2; P5044,p.2; P5252,p.1; P1508; P1004; P4804; P4803; D4513; D4511; P4799; P4800; P4796; P4801; P4807; P4783.

²³¹² P2693; P1512.

²³¹³ D.HARLAND:T.2018-2020; D.HARLAND:P820,paras.28,35-39,43,63,155; [REDACTED]; M.BELL:T.9769-9770; M.BELL:P1996,para.60; P.TUCKER:P4203,para.49; M.ROSE:P1638,paras.28,197,199.

²³¹⁴ See Brief,fn.2268.

²³¹⁵ See Brief,fn.2269.

²³¹⁶ D.HARLAND:T.2018-2020.

²³¹⁷ D.HARLAND:P820,para.41.

²³¹⁸ P2260,p.3.

²³¹⁹ See SIS.G10.

²³²⁰ P1782; P5943.

²³²¹ KDZ450:P5906,paras.28,141; [REDACTED]; KDZ450:T.10549-10551,10571-10573.

²³²² A.BANBURY:P2451,para.154; P2493,p.9.

622. **KARADŽIĆ**'s modulation of the campaign of terror can also be seen in his restrictions of humanitarian aid and cutting of utilities to Sarajevo,²³²³ restrictions levied in support of his campaign of terror,²³²⁴ and often timed to coincide with periods of increased shelling and sniping.²³²⁵ These denied residents the basic necessities for life, increasing their sense of helplessness and fear, and forced civilians out of their homes to search for food, water and fuel, where they became easy targets for snipers or shells.²³²⁶ This was another way for **KARADŽIĆ** to turn the "spigot of terror."²³²⁷

623. **KARADŽIĆ** also ratcheted down the campaign of terror in response to international pressure and international agreements:

- On 26 June 1992, the UN SG issued a statement to the UNSC calling for the Bosnian Serb attacks and use of heavy artillery against the civilian population in Dobrinja to cease immediately.²³²⁸ The following day, the Presidency—considering that "[w]e are walking the edge of the abyss"²³²⁹—ordered the VRS-GŠ to cease artillery and infantry operations in the Dobrinja area due to "political consequences,"²³³⁰ a decision **KARADŽIĆ** reported to CUTILIERO and CARRINGTON that same day.²³³¹
- At a meeting on 9 October 1992, Presidency decided to halt artillery bombardment on Sarajevo "because UNPROFOR is "exerting control."²³³² These instructions were implemented by the SRK in the city the very next day.²³³³
- On 16 July 1993, the SRK Command issued an order not to fire at "the central Sarajevo area" but only to fire "in case of necessary self-defence." The reason

²³²³ D.HARLAND:P820,paras.122,171; D.HARLAND:T.2018-2020,2234; D2294; P834; P859; P860; D1160,p.3; P1639; M.ROSE:P1638,paras.118,127-129,150; P6068; D1175; P834; [REDACTED]; P2256; P879,p.3; D.MILOŠEVIĆ:T.33228.

²³²⁴ M.ROSE:T.7255-7256.

²³²⁵ D.HARLAND:P820,paras.38-39; D.HARLAND:T.2018-2020.

²³²⁶ A.VANLYNDEN:P926,para.23-24. *See also* J.BOWEN:P2068,para.19; M.BELL:P1996,paras.49-50; P2016; P1999;P.TUCKER:P4203,paras.44,49; S.DŽEVLAN:P2291,p.2.

²³²⁷ D.HARLAND:P820,para.39. *See also* D.HARLAND:P820,paras.37-38; P.TUCKER:P4203,para.44.

²³²⁸ P1523.

²³²⁹ P1478,p.240.

²³³⁰ P1504. *See also* P1523; [REDACTED]; P1478,pp.238-240. *Contra* D590.

²³³¹ D2977.

²³³² D431; P1270,p.4.

²³³³ P1264.

for the restraint was an "agreement between President **KARADŽIĆ**, UNPROFOR and our enemy."²³³⁴

624. A further telling example of **KARADŽIĆ**'s modulation of the shelling and sniping campaign occurred after a Serb offensive in the area of Igman and Bjelašnica, part of a larger operation which had been launched in June 1993,²³³⁵ aimed at consolidating and expanding territory prior to peace talks in late July.²³³⁶ As a result of the offensive, IZETBEGOVIĆ asked that talks be postponed and NATO threatened airstrikes.²³³⁷ An alarmed **KARADŽIĆ** took steps to forestall international military action,²³³⁸ including orders to his VRS-GŠ.²³³⁹ These orders, implemented by the SRK,²³⁴⁰ included directives that no shell was to land on Sarajevo.²³⁴¹ On 11 August, when the parties signed the Military Agreement on Peace in BiH,²³⁴² **KARADŽIĆ** ordered GVERO to ensure that no shell goes "towards town at any price."²³⁴³ This order, and its underlying rationale, was immediately conveyed by the SRK Command, which ordered units "[n]ot to open fire over the city of Sarajevo, at any price,"²³⁴⁴ based on political considerations.²³⁴⁵

625. On 7 February 1994, in the aftermath of G8, **KARADŽIĆ** made all SRK commanders answerable to him for their actions following objections from the "international community" for what he described as the SRK's "scale of retaliation."²³⁴⁶ The order was implemented by the VRS-GŠ²³⁴⁷ and the SRK.²³⁴⁸ Committing, in KRAJIŠNIK's words, to do everything to avoid airstrikes "except capitulate,"²³⁴⁹ **KARADŽIĆ** then ordered and implemented a number of dramatic

²³³⁴ P2661.

²³³⁵ D.HARLAND:P820,paras.43-46; P824; P977pp.3-4; D568,p.4.

²³³⁶ D.HARLAND:P820,paras.44-46; P835,p.5.

²³³⁷ D.HARLAND:P820,para.49; D.HARLAND:T.2020.

²³³⁸ P1483,pp.262-264; D.HARLAND:T.2029-2032; P824; D3328. Re:MUP withdrawal: D3581.

²³³⁹ P1483,pp.262-263; P4786; P4796(date corrected to 02 August 1993;

██████████ P5054; P4802; P4804; D3872; P4805; P4806; P4783; P5042; D4512; D4513; D4511; P4799; P4802; D.HARLAND:T.2030. *See also* P5054; P5056.

²³⁴⁰ P825/P2665(duplicates); P5042.

²³⁴¹ P4802.

²³⁴² P5041.

²³⁴³ P4804; P825/P2665(partial duplicates); D.HARLAND:T.2033-2036.

²³⁴⁴ P825/P2665(partial duplicates). *See also* D.HARLAND:T.2020 on reduction in shelling and sniping in Sarajevo around this time.

²³⁴⁵ P825/P2665(partial duplicates); D.HARLAND:T.2034-2035. *See also* P5042.

²³⁴⁶ P846/P3053(partial duplicates).

²³⁴⁷ P4493.

²³⁴⁸ P1642.

²³⁴⁹ P827,p.6.

military and humanitarian concessions to head off the possibility of NATO attacks, including a cease-fire for the Sarajevo area, and the imposition of the TEZ.²³⁵⁰

626. **KARADŽIĆ**'s strategy of modulating the level of terror was apparent to international observers, who remarked on his ability to improve conditions by stopping the sniping and shelling, and vice-versa, as well as his propensity to use this as leverage in negotiations.²³⁵¹

627. The strategic importance of Sarajevo made it particularly vulnerable to its use as leverage in negotiations, retaliation or degrading Muslim will to resist.²³⁵²

KARADŽIĆ underlined the importance of Sarajevo to the Assembly, telling delegates that the battle in Sarajevo was of decisive importance, "because it does not allow the establishment of even the illusion of a state. Alija does not have a state while we have part of Sarajevo."²³⁵³

3. **KARADŽIĆ** denied and deflected international criticism

628. **KARADŽIĆ** had a range of responses to the many protests he received against the sniping and shelling of civilians. Although at times he would acknowledge responsibility, such as when acknowledging to international interlocutors that Serb retaliation was "unappropriate" (sic)²³⁵⁴ or the shelling of Sarajevo was "senseless,"²³⁵⁵ he generally responded with a range of deflections, including false assurances, false denials, pointing the finger at others, *tu quoque*, cavalier brush-offs or even threatening to do worse. All his deflections and denials had the same purpose—to advance the campaign.

²³⁵⁰ D.HARLAND:P820,paras.79,84-86; F.THOMAS:P1558,paras.97,100,105,107; P826,pp.4-5; P827,pp.2-3. *See also* D961.

²³⁵¹ *See* Brief,fn.2268; A.BANBURY:P2451,para.200; A.BANBURY:T.13310-13313; M.BELL:T.9769-9770; M.BELL:P1996,para.60; TUCKER:P4203,para.49; ROSE:P1638,paras.28,197,199; M.ROSE:T.7456-7458; KDZ450:T.10548-10550,10676; A.VANLYNDEN,P926,para.22; D.HARLAND:P820,paras.35-37,53.

²³⁵² A.BANBURY:P2451,para.73; P.TUCKER:P4203,paras.44,49,82-85,90.

²³⁵³ P956,p.10; D92,p.16. *See also* P969. *See also* A.VANBAAL:P1818,paras.31-32; A.BANBURY:P2451,para.197; P973,pp.58-63; P1483,pp.392-396.

²³⁵⁴ P5034,p.3.

²³⁵⁵ M.ROSE:P1638,paras.26,30-31,34; D700,pp.1-2; P1650p.2. Other examples include: on 18 April 1992, the Sarajevo TV station was hit by Serb mortar fire in an attack acknowledged by **KARADŽIĆ**. C.DOYLE:P918,pp.31-33; P2045. At the beginning of June, **KARADŽIĆ** and other members of the BSL admitted that their forces were responsible for an attack on unarmed civilian personnel delivering food. J.WILSON:P1029,para.70; P1039.

629. **KARADŽIĆ** sometimes impliedly acknowledged responsibility by falsely promising an end to the attacks. For example, ABDEL-RAZEK described his meetings with the Accused as "positive" and "happy," with agreements to stop shelling, but "the problems continued. The shelling intensified [...] I heard so many happy words from you and Mr. GALIĆ; however, that was contrary to what happened on the ground."²³⁵⁶

630. On other occasions, **KARADŽIĆ** provided false excuses when confronted about the sniping and shelling campaign. For instance, when MORILLON conveyed the SG's plea to stop the bombardment in May 1992 (G1), **KARADŽIĆ** disingenuously explained that the attack—which had been executed as ordered²³⁵⁷—was an over-reaction by his "inexperienced and self-organised" forces.²³⁵⁸ At a meeting on 16 October 1993, when BRIQUEMONT protested about the shelling and sniping of civilians, **KARADŽIĆ** replied he had ordered firing to stop, and that any subsequent firing was the result of "rogue individuals."²³⁵⁹ He repeated this "rogue" excuse throughout the conflict,²³⁶⁰ despite the manifest falsity of this claim in light of such factors as SRK command and control, the resources expended, the coordination required and the failure to punish perpetrators.²³⁶¹

631. **KARADŽIĆ** also deflected protests by falsely blaming the Muslim side, or saying it was necessary to defend the Serbs in Sarajevo.²³⁶² ROSE said of **KARADŽIĆ** that: "[w]hen accused of carrying out some terrible atrocity, such as the shelling of the market place in Sarajevo, he would always blame the actions on the Muslims."²³⁶³ OWEN noted: "When asked, 'Why are you shelling Sarajevo?' he

²³⁵⁶ H.ABDEL-RAZEK:T.5530-5531,5586; D.HARLAND:T.2037-2038; D3489,p.43. *See also* C.DOYLE:P918,pp.32-33; *See* Brief,para720.

²³⁵⁷ *See* IV.E.2.(a).(i): Scheduled incidents G1 and G2

²³⁵⁸ P1036,p.1. *See also* P1039,p.3; J.WILSON:P1029,para.80-82; J.WILSON:T.4079-4080.

²³⁵⁹ P830,p.5; D.HARLAND:P820,paras.60-64.

²³⁶⁰ D.HARLAND:P820,paras.106,302-303; V.JOVANOVIĆ:D3015,para.52;

V.JOVANOVIĆ:T.34325-34326; AF43.

²³⁶¹ *See* IV.C.5.(b): Failure to investigate or punish. P.TUCKER,P4203,paras.109-113;

D.HARLAND:P820,paras.60-64.

²³⁶² J.WILSON:P1029,paras.49,122; P809,pp.5,10,11; P941,para.4; D234; M.ROSE:P1638,para.201;

M.ROSE:T.7269; P2564,p.5/P4359,pp.4-5(partial duplicates); P799,book p.200; P1274,p.2; D682,pp.3-4; D1057,p.3.

²³⁶³ M.ROSE:P1638,para.209.

replies, 'We're not, it's the Muslims. We're not attacking, just protecting our homes in and around Sarajevo.'²³⁶⁴

632. When negotiators in the midst of a bombardment confronted **KARADŽIĆ** about the shelling, **KARADŽIĆ** responded by accusing the Muslims of starting the war by expelling him from his apartment in Sarajevo.²³⁶⁵

633. **KARADŽIĆ'S** false promises and false denials were echoed by his subordinates, **GALIĆ**,²³⁶⁶ **MILOŠEVIĆ**²³⁶⁷ and **INĐIĆ**,²³⁶⁸ and fit into an overall pattern. As Defence witness, **AKASHI** diplomatically observed, "**KARADŽIĆ** as a negotiator had the tendency to twist the truth rather nonchalantly – a trait I observed not a few times."²³⁶⁹ **KARADŽIĆ** simply did not tell the truth.²³⁷⁰

634. On other occasions, **KARADŽIĆ** treated protests capriciously. Once he refused to accept a protest letter from **ABDEL-RAZEK** because it did not address him as "President of the RS."²³⁷¹ On 30 April 1995, he responded to General **JANVIER'S** complaint that Bosnian Serb forces were firing on civilians in Doboj by saying, "[m]aybe some of our gunners have bad eyes,"²³⁷² thereby brushing off the shelling of civilians with a joke.

635. Finally, **KARADŽIĆ** issued threats in response to international criticism. When in May 1995, **SMITH** objected to Serb shelling of civilian areas, **KARADŽIĆ** threatened that the UN would be treated as an enemy if there were airstrikes to deter the shelling, and that the enemy's actions would result in "counter moves against them, particularly in Sarajevo."²³⁷³

²³⁶⁴ P799,book p.200.

²³⁶⁵ H.OKUN:P776,pp.60-61.

²³⁶⁶ D.FRASER:T.8025; *See also* P1785,p.1; H.ABDEL-RAZEK:P1258,pp.13,15; D.FRASER:T.8024-8025,8049-8050; [REDACTED]; P1066,p.2.

²³⁶⁷ [REDACTED]

²³⁶⁸ A.VANBAAL:P1818,para.39.

²³⁶⁹ D3489,p.43(AKASHI book).

²³⁷⁰ D162,p.49; M.ROSE:P1638,paras.93,208; P799,book p.200; H.OKUN:T.1844-1845.

²³⁷¹ H.ABDEL-RAZEK:P1258,p.22.

²³⁷² A.BANBURY:P2451,para.154; P2493,p.9.

²³⁷³ P2264; R.SMITH:T.11355-11357.

4. KARADŽIĆ brought in MLADIĆ and approved his plans for the campaign of terror

636. From the outset, MLADIĆ, who as discussed earlier was personally selected by KARADŽIĆ,²³⁷⁴ left no doubt as to his willingness to participate in the Terror JCE. On the day he was formally appointed, MLADIĆ proposed increasing the violence directed against civilians in encircled Sarajevo. He laid out his plans to KARADŽIĆ and others for ringing the city with hundreds of weapons,²³⁷⁵ besieging Sarajevo. He explained that efforts to date had been insufficient and needed to be intensified:

Just as this Military Hospital was under blockade, so the Muslims too are under a blockade. There is nowhere they can go. One of the reasons is because the head of the dragon of fundamentalism lies beneath our hammer. To tell the truth, what I have seen, and I must tell you that I have seen a very bad picture and have ordered officers from the Knin Corps to come who will very soon change this picture. One cannot take Sarajevo by spitting at it from a mortar or howitzer. You cannot win the negotiations that way either [...]²³⁷⁶

637. He advocated denying the city use of its hospitals "unless they accept peace."²³⁷⁷ He called for choking Sarajevo's access to electricity, gas and water, and then lying about it by blaming the Muslims.²³⁷⁸

638. Throughout May 1992, MLADIĆ made repeated terroristic threats of retaliation against the entire city of Sarajevo.²³⁷⁹ In a 19 May 1992 intercept, MLADIĆ threatened that if the Muslims brought a cistern to Sarajevo their commander "would sentence first himself and then entire Sarajevo to death."²³⁸⁰ He told BAROŠ on 19 May: "Anything they deprive you of, we will deprive Sarajevo of! If a bullet is fired at you, you will see what will be fired at Sarajevo."²³⁸¹ He showed his intention to carry out an indiscriminate military campaign against the city, telling

²³⁷⁴ See III.B.5.(a): Ratko MLADIĆ. See also M.MARTIĆ:T.38155; P6318; H.OKUN:P776,pp.47-48.

²³⁷⁵ P956,p.36.

²³⁷⁶ P956,p.35.

²³⁷⁷ P956,p.38.

²³⁷⁸ P956,pp.38-39.

²³⁷⁹ P6070; P1041; J.WILSON:P1029,paras.71-76; J.WILSON:T.3921-3922,4053-4057; P6069; P5657.

²³⁸⁰ M.GAGOVIĆ:T.31872-31974; P6070; P5673.

²³⁸¹ P5672,p.2.

POTPARA: "We'll wage our war and if necessary I'll tear down all of Sarajevo for you if that's what it takes."²³⁸²

639. Days later, MLADIĆ proposed to **KARADŽIĆ**, VRS personnel and political leaders that SRK forces massively bombard Sarajevo with all available weapons.²³⁸³

[REDACTED]
[REDACTED]
[REDACTED] **KARADŽIĆ** and others "backed" and "supported" the proposal.²³⁸⁶

640. The SRK then carried out a 24-hour bombardment of the entire city of Sarajevo on 28-29 May 1992 (G1) under MLADIĆ's personal, operational command.²³⁸⁷ This was followed a week later by another massive and indiscriminate shelling of the city (G2).²³⁸⁸

641. A year later, **KARADŽIĆ**'s continuing approval of the terror campaign was reflected in a 2 June 1993 meeting. MLADIĆ presented a report to **KARADŽIĆ**, the VRS-GŠ, the SRK Commander, and others²³⁸⁹ that underscored efforts that should be made to ensure "keeping constant the negative effect on the moral [sic] of Muslim forces and population, keep them in fear [...]".²³⁹⁰

642. **KARADŽIĆ** approved MLADIĆ's direction to the SRK: in his military notebook, MLADIĆ recorded that **KARADŽIĆ** supported "everything that had been said here."²³⁹¹

²³⁸² P5693.

²³⁸³ [REDACTED]. See also J.WILSON:P1029,paras.71-73; J.WILSON:T3921-3922,4052-4057; P1040; P1041,p.1.

²³⁸⁴ [REDACTED]

²³⁸⁵ [REDACTED]

²³⁸⁶ [REDACTED]

²³⁸⁷ [REDACTED];

J.WILSON:P1029,para.76; J.WILSON:T.3918,3922-3924; P1518; P5050; P1042; P1511; P1522; P1513; P1514. See also D574; [REDACTED]; D207.

²³⁸⁸ See IV.E.2.(a).(i): Scheduled incidents G1 and G2.

²³⁸⁹ P1483,pp.182-194.

²³⁹⁰ P2710,p.9. See also P5980.

²³⁹¹ P1483,p.194.

5. KARADŽIĆ permitted the campaign to continue and failed to prevent or punish perpetrators

643. Despite his awareness of the illegality of the sniping and shelling campaign and his demonstrated ability to halt it when he wished, **KARADŽIĆ** allowed the campaign of terror to continue for 44 months. He took no meaningful steps to prevent, investigate or punish SRK unlawful attacks on civilians in Sarajevo. Instead, he promoted or awarded those responsible for the campaign. He thereby created and sustained a culture of impunity.

(a) Awareness of the Campaign of Terror

644. The evidence is overwhelming that **KARADŽIĆ** knew about the nature and extent of the sniping and shelling campaign and its effects on the populace in Sarajevo. As a preliminary matter, his denials, deflections, and in particular occasional frank acknowledgments of protests, discussed above,²³⁹² demonstrate such awareness.

645. **KARADŽIĆ** received written and face-to-face protests from international observers, and was exposed to media reports in an environment saturated²³⁹³ with news about the effect of the terror campaign on Sarajevo civilians. **KARADŽIĆ** followed this media coverage closely.²³⁹⁴

646. Throughout the sniping and shelling campaign, UN and international political and military officials repeatedly and strongly protested to **KARADŽIĆ** about attacks on Sarajevo's civilians. For example:

²³⁹² See IV.C.3: **KARADŽIĆ** denied and deflected international criticism.

²³⁹³ KDZ450:P5906, paras. 131-132; [REDACTED]; A.VANLYNDEN:P926, para. 11; A.BANBURY:P2451, para. 201; M.BELL:P1996, paras. 3, 70; M.BELL:T.9755, 9795-9796; J.BOWEN:P2068, para. 70; J.BOWEN:T.10082-10083, 10110-10116, 10140-10141; A.VANLYNDEN:P926, paras. 6-13, 27, 30, 44, 53, 69-73, 75-77; A.VANLYNDEN:T.2417-2420; [REDACTED]

²³⁹⁴ [REDACTED]; [REDACTED]; A.VANLYNDEN:P926, paras. 12-13, 69-73, 76-77; A.VANLYNDEN:T.2417-2418; M.BELL:T.9795-9796.

- UN representatives met on 30 May 1992 with Slobodan MILOŠEVIĆ and **KARADŽIĆ** in an appeal to stop what even MILOŠEVIĆ described as the "bloody, criminal" bombardment of the civilian population of Sarajevo.²³⁹⁵
- At a December 1992 meeting with **KARADŽIĆ** and MLADIĆ, OWEN denounced the shelling of Sarajevo as a "disgrace", saying that on the previous day he had even seen artillery shells in the recovery room of a Sarajevo hospital.²³⁹⁶ One month later MORILLON protested to **KARADŽIĆ** about a direct artillery hit on the Koševo hospital that injured patients and staff, noting that "[t]here can be no excuse for shelling a hospital."²³⁹⁷

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- After women and children were killed in G4, MORILLON immediately sent a protest letter to **KARADŽIĆ** on 2 June 1993.²⁴⁰¹
- AKASHI met with **KARADŽIĆ** to discuss shelling, sniping and other issues.²⁴⁰²
- ROSE raised the issue of sniping and shelling of civilians with the BSL at every meeting from January 1994 onwards.²⁴⁰³ He also protested to

²³⁹⁵ P1035,para.3; P1036.

²³⁹⁶ P.TUCKER:P4203,paras.95-99; P2034; P1273; M.BELL:P1996,para.82.

²³⁹⁷ P1275. *See also* P6336.

²³⁹⁸

²³⁹⁹ [REDACTED]. *See also* [REDACTED]

²⁴⁰⁰

²⁴⁰¹ P5059. *See also* P1068.

²⁴⁰² D3491,pp.1,3,paras.3,8; P1676; P2479,p.3,para.6; P2255,p.7,para.6; A.BANBURY:P2451,paras.96-98.

²⁴⁰³ M.ROSE:P1638,paras.26,30,107,151,200-201.

KARADŽIĆ about shelling, sniping and harassment of convoys,²⁴⁰⁴ including specific protests about G7²⁴⁰⁵ and F11.²⁴⁰⁶

- As BANBURY explained, the problem of sniping at civilians in Sarajevo was so prevalent that the UN constantly raised the issue with **KARADŽIĆ**, his military and other officials.²⁴⁰⁷

647. These are just a sampling of the many protests made to **KARADŽIĆ** regarding the sniping and shelling of civilians in Sarajevo.²⁴⁰⁸

648. **KARADŽIĆ**'s subordinates, MLADIĆ,²⁴⁰⁹ GALIĆ,²⁴¹⁰ MILOŠEVIĆ,²⁴¹¹ and INDIĆ²⁴¹² also received protests against the shelling and sniping of civilians as well as other parts of the campaign of terror.

649. **KARADŽIĆ** (and other members of the BSL) were also "absolutely" aware of UNSC resolutions condemning the shelling and sniping of civilians in Sarajevo,²⁴¹³ yet ignored them. **KARADŽIĆ** confirmed his contempt for—and awareness of—

²⁴⁰⁴ P1656; M.ROSE:P1638,paras.35,63,146; M.ROSE:T.7269-7271; P868.

²⁴⁰⁵ M.ROSE:P1638,para.35.

²⁴⁰⁶ P1644,p.2.

²⁴⁰⁷ A.BANBURY:T.13469.

²⁴⁰⁸ J.WILSON:P1029,paras.49,122; [REDACTED]; P4216,pp.1-2; P.TUCKER:P4203,para.15; P4226; P845; P830,p.5; D.HARLAND:P820,paras.60-64,122-123; D.HARLAND:T.2037-2038; P1672,para.5; P3862,para.3; P2260,para.3; R.SMITH:T.11655-11657; P2264,paras.3,6; H.ABDEL-RAZEK:P1258,pp.17,21-22,24.

²⁴⁰⁹ P1043; P1044; P1478,p.34 J.WILSON:P1029,paras.55,77-78,126-127; J.WILSON:T.3924-3926; P1271; H.ABDEL-RAZEK:P1258,p.22; P1672p.2; P867; M.ROSE:T.7268-7271; P1644,p.2; M.ROSE:P1638,paras.56,155-156; D.HARLAND:P820,paras.143-145; D.HARLAND:T.2037-2038; P876,para.3; P1470,para.3; P2455,para.9; P2274; R.SMITH:T.11309-11311,11420-11421; AF2877; P2107; P.TUCKER:P4203,paras.25-26; [REDACTED]; P2125; [REDACTED]; P5906,para.54; [REDACTED].

²⁴¹⁰ D.FRASER:T.8018,8024-8025,8049-8050; D.FRASER:P1762,pp.21-23,43-46; H.ABDEL-RAZEK:P1258,pp.13,15,16-17,18,24,26,27; H.ABDEL-RAZEK:T.5553-5556; P1054; P1059; R.MOLE:P1426,paras.97-100; AF38-AF41; S.GALIĆ:T.37643-37646; P1065,pp.2,4; P1061; P1066; [REDACTED]; P1785,p.1;

A.VANBAAL:P1818,para.39; P1059; P1060; P6298.

²⁴¹¹ D.FRASER:T.8018; D.FRASER:P1762,pp.8-9; AF2876-AF2877; P2134; [REDACTED]; [REDACTED]; T.10490,10496; [REDACTED]; [REDACTED]; [REDACTED];

P895; P2107,p.3; D.HARLAND:P820,paras.210-212. See also AF2873.

²⁴¹² M.INDIĆ:D2774,paras.84-85; F.THOMAS:P1558,paras.53-54,57-58.

²⁴¹³ P.TUCKER:P4203,para.288; P981; P982; P984; D.HARLAND:P820,para.185; AF9; AF10; AF12; D1509; D162,p126.

such condemnations when, on 29 May 1995, the Supreme Command declared all UNSC resolutions null and void.²⁴¹⁴

(b) Failure to investigate or punish

650. If **KARADŽIĆ** had wanted to order investigations of SRK crimes occurring in Sarajevo, he could have done so effectively. On occasions where he genuinely sought information about SRK conduct, **KARADŽIĆ** issued such orders and they were acted upon.²⁴¹⁵ Defence witnesses acknowledged that from the earliest days of the conflict the SRK could investigate the criminal conduct of its soldiers for incidents such as theft, assault, and attempted murder,²⁴¹⁶ and even conducted investigations of crimes against humanity committed against Serbs.²⁴¹⁷ SRK Command documents confirm its use of the power to investigate and punish its soldiers,²⁴¹⁸ and MILOŠEVIĆ acknowledged his power to submit criminal reports.²⁴¹⁹

651. Unsurprisingly, this power was not exercised. **KARADŽIĆ** would not logically have punished his subordinates for implementing his policies and did not do so. Instead, his deflections and denials of unlawful shelling and sniping²⁴²⁰ reflected a climate of impunity for such conduct within the SRK. **KARADŽIĆ** attempted during the war to maintain the falsehood that no investigations or punishment were required and the stream of witnesses who testified for him attempted to perpetuate the same falsehood,²⁴²¹ contrary to the vast weight of the evidence. Denying the occurrence of unlawful shelling and sniping within their range of knowledge,²⁴²² they necessarily implied an absence of any reporting or investigations regarding such crimes, a fact

²⁴¹⁴ P887.

²⁴¹⁵ For example, in March 1995, incensed by a report written by Colonel DRAGIČEVIĆ (P2691), **KARADŽIĆ** issued an order to the SRK Command demanding information about this act (P2679), and this order was immediately acted upon (P2681); P2680. Likewise, in May 1995, **KARADŽIĆ** issued an order to the SRK through the VRS-GŠ to establish an investigation into an incident "which happened in the Independent Prača Battalion on 10 May 1995". P2682.

²⁴¹⁶ See, e.g., V.LUČIĆ:T.30785-30787,30803-30804.

²⁴¹⁷ P2646.

²⁴¹⁸ P2695; P2708; P2706.

²⁴¹⁹ D.MILOŠEVIĆ:T.32859; AF2881-AF2882.

²⁴²⁰ See IV.C.3: **KARADŽIĆ** denied and deflected international criticism.

²⁴²¹ See, e.g., S.VELJOVIĆ:D2351,para.15; M.DŽIDA:D2375,para.19; M.GARIĆ:D2379,para.25; S.DŽINO:D2387,para.38; B.TOMIĆ:D2418,paras.17-18; V.DUNJIĆ:D2451,para.10; R.MAKSIMOVIĆ:D2667,para.10.

²⁴²² See, e.g., S.VELJOVIĆ:D2351,para.15; M.DŽIDA:D2375,para.19; M.GARIĆ:D2379,para.25; S.DŽINO:D2387,para.38; B.TOMIĆ:D2418,paras.17-18; V.DUNJIĆ:D2451,para.10; R.MAKSIMOVIĆ:D2667,para.10.

that several of them confirmed.²⁴²³ Moreover, if **KARADŽIĆ** had ever ordered the Main Staff or SRK Command to investigate or refer for prosecution SRK members for any of the countless shelling or sniping incidents forming the basis for UNPROFOR protests, it would have been known by GALIĆ or MILOŠEVIĆ—yet of approximately 70 criminal reports he referred for further procedure, MILOŠEVIĆ could not name a single one that related to firing on civilians in Sarajevo,²⁴²⁴ while GALIĆ simply repeated the same pretextual excuses in court that he used with UNPROFOR at the time, ultimately claiming that he did not have enough "information" to initiate investigations.²⁴²⁵

652. **KARADŽIĆ**'s approval of the unlawful sniping and shelling campaign is plainly revealed by the promotions and awards he gave to those chiefly responsible for its implementation. He promoted GALIĆ and MILOŠEVIĆ,²⁴²⁶ promoted MLADIĆ to Colonel-General,²⁴²⁷ and awarded a medal to MILOŠEVIĆ for humanitarian work.²⁴²⁸

D. KARADŽIĆ worked with other JCE members to implement the Terror JCE

653. **KARADŽIĆ** worked with other members of the JCE to achieve the common criminal purpose in Sarajevo, some of whom are addressed below.

1. MLADIĆ oversaw the strategy for the campaign of terror

654. MLADIĆ was a key member of the Terror JCE. As VRS-GŠ Commander for the duration of the war, he significantly contributed to the JCE by intensifying and overseeing the strategy for the campaign of terror. He personally commanded the massive bombardment of the city on or around 28 May 1992 (G1), and he maintained the campaign of sniping and shelling.

²⁴²³ See, e.g. V.LUČIĆ:T.30786; L.DRAGIČEVIĆ:T.31438-31440; B.KOVAČEVIĆ:T.28993-28994,29076-29077; S.GENGO:T.29829-29830.

²⁴²⁴ D.MILOŠEVIĆ:T.32859-32860; S.GALIĆ:T.33212-33213.

²⁴²⁵ GALIĆ:T.37822,37811,37809.

²⁴²⁶ P2649; P2678; P2676; P2677; D2149,p.24.

²⁴²⁷ P3046.

²⁴²⁸ D.MILOŠEVIĆ:T.32416-32417.

655. MLADIĆ maintained firm control over the implementation of the campaign of terror throughout the Indictment period.²⁴²⁹ It was graphically illustrated by MLADIĆ himself, when he stopped near a Serb artillery position with VANLYNDEN,²⁴³⁰ pointed to the city of Sarajevo, and then pointed to the palm of his hand, saying: "Sarajevo is there."²⁴³¹

656. Following his call at the 16th Assembly for an intensified campaign of violence,²⁴³² as mentioned earlier, MLADIĆ spoke repeatedly of the devastation he intended levying against the entire city of Sarajevo.²⁴³³ In a conversation dated 11 May 1992 he told POTPARA that if the Muslims didn't allow withdrawal of their forces, he would open fire on Sarajevo and it would be "worse than Zadar."²⁴³⁴ He ordered subordinates to shell neighbourhoods and areas in the context of the large-scale bombardment of the city in May 1992 (G1).²⁴³⁵ He further helped introduce MABs into the VRS's arsenal.²⁴³⁶

657. MLADIĆ openly acknowledged his use of terror as a retaliatory tool. When confronted with a complaint about intensified SRK sniping of civilians in March 1995, he admitted it was in retaliation for Serb casualties suffered in military offensives launched by the BiH government.²⁴³⁷

658. MLADIĆ even congratulated "the heroism of units" for their use of MABs.²⁴³⁸

659. His role was consistent throughout: "[REDACTED]
[REDACTED]
[REDACTED].²⁴³⁹

²⁴²⁹ [REDACTED]; [REDACTED]; [REDACTED]; H.ABDEL-RAZEK:P1258,p.28; P1788; D.FRASER:T.8028-8029; R.SMITH:T.11302-11305; M.ROSE:P1638,para.204.

²⁴³⁰ A.VANLYNDEN:P926,paras.77-87; P842.

²⁴³¹ A.VANLYNDEN:P926,para.79.

²⁴³² See III.B.5.(a): Ratko MLADIĆ.

²⁴³³ P6070; P1041,p.1; J.WILSON:P1029,paras.75-76; J.WILSON:T.3921-3922,4053-4057; P5670; P5673,p.2; P5657,p.2.

²⁴³⁴ P5693. See also D207,p.7. Zadar is a Croatian coastal city where MLADIĆ led "decisive" and "daring" operations. P3033,p.172. It was besieged by the JNA Knin Corps in September 1991. R.DONIA:P971,p.17.

²⁴³⁵ P1522/P5601(partial duplicates); P1511; P1521/D931Conversation15(partial duplicates); P1042; P1518/D931,Conversation3/P5601(partial duplicates); P1513; P1514.

²⁴³⁶ P1484,p.108; B.ZEČEVIĆ:P2318,pp.12,69; P5064; AF2818; P1277; P2320.

²⁴³⁷ A.BANBURY:P2451,para.94; P2455,para.9; A.BANBURY:T.13467-13468. See also: M.BELL:P1996,paras.98-99; P2032; P2017; P2482,para.10; D.HARLAND:P820,para.171; [REDACTED]:T.10492-10493; P2480,pp.3-4; D1123,p.3. See SIS:F16.

2. GALIĆ and MILOŠEVIĆ supervised the SRK's implementation of the campaign of terror

660. As SRK Corps Commanders, GALIĆ and MILOŠEVIĆ were key implementers of the campaign of terror. Both were convicted at this Tribunal for the crime of terror and related crimes stemming from the sniping and shelling campaign against the civilian population of Sarajevo.²⁴⁴⁰

(a) GALIĆ

661. A career JNA officer,²⁴⁴¹ GALIĆ was SRK Commander from 10 September 1992 to 10 August 1994.²⁴⁴² In this position, he directed and oversaw his subordinates' sniping and shelling attacks against the civilian population of Sarajevo, stonewalled protests from international observers, and did nothing to prevent or punish his subordinates' crimes. In short, he implemented and supported the campaign of terror.

662. During his testimony, GALIĆ admitted receiving information from his Corps Command Staff, Major INĐIĆ, UNPROFOR and UNMO officers, and media reports, that his subordinates were sniping and shelling in the Sarajevo city centre, causing civilian casualties.²⁴⁴³

663. During the campaign, GALIĆ made frank admissions that his forces were sniping or shelling civilians. On one occasion, GALIĆ admitted to ABDEL-RAZEK "that the shelling came from the Serb side and that it came in retaliation" and that "he shelled the UN building."²⁴⁴⁴ Faced in 1992 with protests about the deliberate sniping of civilians crossing the airport, "GALIĆ said that if the civilians continued to cross the airport, his side would continue shooting at them."²⁴⁴⁵ That is exactly what happened. When desperate conditions caused more civilians to attempt night-time crossings of the airport in early 1993, from five to thirty civilians per night were shot

²⁴³⁸ D854.

²⁴³⁹ [REDACTED]

²⁴⁴⁰ See *Galić* AJ, sec.XVIII(Disposition); *D.Milošević* AJ, sec.XIII(Disposition).

²⁴⁴¹ S.GALIĆ:T.37154.

²⁴⁴² S.GALIĆ:T.37155; AF25-AF27; AF31.

²⁴⁴³ S.GALIĆ:T.37788-37789. See also S.GALIĆ:T.37643-37646.

²⁴⁴⁴ H.ABDEL-RAZEK:P1258,p.21.

²⁴⁴⁵ H.ABDEL-RAZEL:P1258,pp.18,21; H.ABDEL-RAZEK:T.5658-5661; D523.

by GALIĆ's forces over a two-three-month period, as well as dozens of French UNPROFOR soldiers.²⁴⁴⁶

664. As referred to above, senior UN officials described "countless" protests and complaints to GALIĆ regarding the shelling and sniping of civilians in Sarajevo.²⁴⁴⁷ Verbal protests to GALIĆ were made immediately when UNMOs became aware of the shelling of civilian areas.²⁴⁴⁸ In one instance, shelling of civilian areas continued even as UN officials were meeting with GALIĆ to protest about it.²⁴⁴⁹

665. On some of these occasions, GALIĆ, echoing KARADŽIĆ's similar responses,²⁴⁵⁰ denied the facts on the ground as observed by UNMOs²⁴⁵¹ or automatically blamed "Turks."²⁴⁵² On other occasions, he would conflate the two responses, first denying that the SRK was responsible for shelling, and then threatening to continue the SRK's (supposedly nonexistent) shelling if the Muslims continued their "violations."²⁴⁵³

666. In spite of GALIĆ's knowledge of the unlawful sniping and shelling²⁴⁵⁴ and his ability to initiate disciplinary or criminal measures,²⁴⁵⁵ as noted above, GALIĆ admitted taking essentially no steps to initiate investigations into such incidents.²⁴⁵⁶

(b) MILOŠEVIĆ

667. MILOŠEVIĆ furthered the common purpose by, *inter alia*, continuing the implementation of the shelling and sniping campaign as SRK commander, and exacerbating the terror campaign by personally commanding the deployment and use of MABs in SRK-held territory.

668. MILOŠEVIĆ served in the Sarajevo theatre from the first weeks of the conflict, initially as commander of the 1st Romanija Brigade under GALIĆ,²⁴⁵⁷ then as

²⁴⁴⁶ P.TUCKER:P4203,paras.117-123; [REDACTED].

²⁴⁴⁷ See IV.C.5.(a): Awareness of the campaign of terror.

²⁴⁴⁸ J.HAMILL:P1994,pp.91-92.

²⁴⁴⁹ H.ABDEL-RAZEK:P1258,p.26.

²⁴⁵⁰ See IV.C.3: KARADŽIĆ denied and deflected international criticism.

²⁴⁵¹ D.FRASER:T.8024-8025,8049-8050; [REDACTED].

²⁴⁵² See P1066,p.2.

²⁴⁵³ H.ABDEL-RAZEK:P1258,p.15. See also p.13; D.FRASER:T.8025. See also P1785,p.1.

²⁴⁵⁴ AF41. See also AF33-34.

²⁴⁵⁵ D3461; D3483; AF2881.

²⁴⁵⁶ See IV.C.5.(b): Failure to investigate or punish.

²⁴⁵⁷ D.MILOŠEVIĆ:T.32495,32500-32501,32503.

SRK Chief of Staff,²⁴⁵⁸ and finally as SRK Commander from 10 August 1994 until the end of the conflict.²⁴⁵⁹ He was seen as "**KARADŽIĆ's** man."²⁴⁶⁰

669. MILOŠEVIĆ acknowledged his contribution to and support for the terror campaign in his March 1996 speech where he explained how he used the SRK to keep Sarajevo a "permanently boiling kettle under control and blockade," and only restrained the Corps when "some conferences were taking place,"²⁴⁶¹ *i.e.* negotiations between the BSL and others about the conflict.

670. MILOŠEVIĆ was directly and frequently involved in the deployment of inherently indiscriminate²⁴⁶² MABs from at least April 1995.²⁴⁶³ His deliberate use of MABs to inflict terror is demonstrated by his 6 April 1995 order to fire a MAB at "the most profitable target" in Hrasnica or Sokolović Kolonija where "the greatest casualties and material damage would be inflicted,"²⁴⁶⁴ which resulted in G10.²⁴⁶⁵

671. MILOŠEVIĆ knew that subordinate units were sniping, and firing artillery and mortars into civilian areas in the Sarajevo city centre and causing civilian casualties. As referred to earlier, he received numerous oral and written protests from UNPROFOR about crimes committed by SRK troops.²⁴⁶⁶ He explicitly acknowledged that his subordinates had fired "at inhabited settlements and specific buildings when there are no combat actions whatsoever."²⁴⁶⁷ Tellingly, his complaint was that this used up too much needed ammunition.²⁴⁶⁸

672. In spite of his knowledge of the sniping and shelling campaign,²⁴⁶⁹ and his ability to file criminal reports,²⁴⁷⁰ as noted above, MILOŠEVIĆ could not identify an

²⁴⁵⁸ D.MILOŠEVIĆ:T.32503; D2149,p.24.

²⁴⁵⁹ D.MILOŠEVIĆ:T.32503.

²⁴⁶⁰ P1485,p.156; P01473,pp.264-267; D2901

²⁴⁶¹ D568,p.3.

²⁴⁶² See IV.E.1.(a).(ii).b.iii: SRK Artillery used inaccurate Modified Air Bombs (MABs).

²⁴⁶³ AF2863-AF2865; AF2867-AF2871; AF2877-AF2878; P1286; P1303; D782,p.1; P1299; P1283; P1309,p.2; D322,p.1; P1198; P1201; D.MILOŠEVIĆ:T.33163-33166,33171-33172,33175; P1301; P1309.

²⁴⁶⁴ AF2878; P1201. See also P1782.

²⁴⁶⁵ See SIS Shelling Appendix.

²⁴⁶⁶ See IV.C.5.(a): Awareness of the campaign of terror.

²⁴⁶⁷ P2668,p.1.

²⁴⁶⁸ P2668,p.1.

²⁴⁶⁹ See Brief,paras.667-672.

²⁴⁷⁰ D.MILOŠEVIĆ:T.32859.

occasion where he used that ability to initiate proceedings into unlawful shelling or sniping.²⁴⁷¹

3. Presidency Members

673. The other Presidency members, PLAVŠIĆ, KOLJEVIĆ, and KRAJIŠNIK, also shared and advanced the common criminal purpose.

674. They supported the shelling of the entire city,²⁴⁷² and deflected or falsely excused the campaign to the media. For example, in 1992 one UN officer protested the targeting of civilians in Sarajevo directly to PLAVŠIĆ,²⁴⁷³ who, following **KARADŽIĆ**'s example,²⁴⁷⁴ justified such Serb military action as being in self-defence.²⁴⁷⁵ Likewise, as a refined English-speaker, KOLJEVIĆ dealt extensively with international personnel, and frequently received and deflected protests about attacks on civilians by Serb forces.²⁴⁷⁶ KRAJIŠNIK was no less aware and supportive of the illegal attacks against civilians.²⁴⁷⁷ For example, representatives of the army told him that they were "responding *against the neighborhoods* from which fire was opened at the army,"²⁴⁷⁸ and in July 1995, he urged retaliation on the city using MABs.²⁴⁷⁹

E. **Bosnian Serb Forces in Sarajevo implemented the Terror JCE**

1. Composition of the Sarajevo Forces

675. **KARADŽIĆ** and the other JCE members used the Sarajevo Forces as tools²⁴⁸⁰ to implement the Terror JCE in Sarajevo. The main organ for the sniping and shelling campaign was the SRK. Other armed forces including the JNA, the MUP, the TOs and paramilitary groups also participated in implementing the sniping and shelling campaign.

²⁴⁷¹ See IV.C.5.(b): Failure to investigate or punish.

²⁴⁷² [REDACTED]

²⁴⁷³ H.ABDEL-RAZEK:P1258,pp.12-13,21,25.

²⁴⁷⁴ See IV.C.3: KARADŽIĆ denied and deflected international criticism.

²⁴⁷⁵ H.ABDEL-RAZEK:P1258,pp.21,25.

²⁴⁷⁶ H.ABDEL-RAZEK:P1258,pp.12-13,23; P1272,p.3.

²⁴⁷⁷ See IV.E.2.(a)(i): Scheduled incidents G1 and G2; M.KRAJIŠNIK:T.43333.

²⁴⁷⁸ M.KRAJIŠNIK:T.43333(emphasis supplied).

²⁴⁷⁹ P5653; M.KRAJIŠNIK:T.43911.

²⁴⁸⁰ See *Krajišnik* AJ,para.235.

(a) SRK

676. The SRK was formed in May 1992²⁴⁸¹ from volunteer units, the TO and the JNA (specifically, what remained of the JNA 4th Corps).²⁴⁸² Once formed, the SRK maintained the campaign of sniping and shelling within a professional, effective and functioning structure of command and reporting throughout the JCE time period.²⁴⁸³ SRK officers, including the SRK Commanders, confirmed its hierarchical command structure and functioning.²⁴⁸⁴

(i) General SRK Command and Control

677. Experienced military officers and commanders serving with the UN in Sarajevo were unanimous in their assessments of the SRK's excellent command and control throughout the conflict,²⁴⁸⁵ including the SRK's "absolute" control of the use of their heavy weapons.²⁴⁸⁶ SRK command and control was also illustrated in a selection of VRS-GŠ orders to the SRK on a range of aspects of the Corps' operation.²⁴⁸⁷

678. Both GALIĆ²⁴⁸⁸ and MILOŠEVIĆ²⁴⁸⁹ exerted effective daily control over the SRK during their command tenures, and were very familiar with the situation in the Corps overall.²⁴⁹⁰ Both regularly visited the lines, inspecting the troops.²⁴⁹¹

²⁴⁸¹ AF17; AF20; D568,p.1; D308; R.THEUNENS:P3033,p.351.

²⁴⁸² P1509; AF20; AF30; R.PHILIPPS:T.3747,3780,3826,3828; AF2803; AF2805;

[REDACTED]; P1505; D568,pp.1-2; [REDACTED]; D308.

²⁴⁸³ AF35; AF37; R.PHILIPPS:T.3755-3756,3818-3819; P993; P994; P995; D.FRASER:T.8014-8015; P1294.

²⁴⁸⁴ S.GALIĆ:T.37606,37962-37963,37970-37971; S.VELJOVIĆ:T.29235-29238; D.MILOŠEVIĆ:T.32736,33228; R.MAKSIMOVIĆ:T.31570-31571;

[REDACTED] S.GENGO:T.29792-29794.

²⁴⁸⁵ [REDACTED] KDZ185:T.4216 [REDACTED]

[REDACTED] P1299; P1198; R.MOLE:P1426,para.58;

F.THOMAS:P1558,paras.48-50; [REDACTED]

[REDACTED] P5906,paras.41,44,47; D.FRASER:T.8014-8015,8029; P1294; P1788; H.ABDEL-RAZEK:P1258,p.28; [REDACTED]

²⁴⁸⁶ M.ROSE:T.7263-7264; M.ROSE:P1638,para.45; P846/P3053(duplicates). *See also* R.MOLE:P1426,para.52; M.INDIĆ:D2774,para.33; P1641. *See also* AF2861-AF2880.

²⁴⁸⁷ S.GALIĆ:T.37193,37516; P2661,p.1; P2664; R.PHILIPPS:P989,pp.20,22-44(citing P1017,P1019,P1206,P1211); P1017,p.2; P1019,p.1; P1206; P1211; P2671,p.1; D629; P5054; P2647; P2648; P2654; P2655; P2682; P2690; P2666.

²⁴⁸⁸ AF28; AF36; S.GALIĆ:T.37461-37462, 37597; R.MOLE:P1426,paras.46,53-54,56; R.MOLE:T.5906-5907; H.ABDEL-RAZEK:P1258,pp.23-24; R.MAKSIMOVIĆ:T.31570-31571.

²⁴⁸⁹ S.GENGO:T.29792-29794; [REDACTED]; D.FRASER:P.1762,pp.9-10; D.FRASER:T.8014-8015,8028-8029; P1294; P1787; P1788; D.MILOŠEVIĆ:T.32736; P1763.

679. There was a detailed flow of information from frontline SRK units through superior units up to the VRS-GŠ.²⁴⁹² Daily reporting throughout the SRK was obligatory,²⁴⁹³ enabling the SRK to prepare orders and ensure their implementation.²⁴⁹⁴

680. The effectiveness of the SRK command and reporting structure—which was bolstered by the number of SRK officers who had been professional JNA officers and soldiers or JNA trained reserve officers²⁴⁹⁵—was also reflected in SRK orders²⁴⁹⁶ to subordinate units,²⁴⁹⁷ including orders on the positioning and use of artillery and ammunition,²⁴⁹⁸ sniping,²⁴⁹⁹ sniper training,²⁵⁰⁰ and discipline.²⁵⁰¹ Those orders were further disseminated and implemented.²⁵⁰²

681. MILOŠEVIĆ recognised and reported on the the effectiveness of the SRK's own command and control system, in a report to SRK command in September 1992 (in his capacity as commander of the 1st Romanija Infantry Brigade), saying that the Brigade's manpower levels "guarantee [...] successful command in all the units" and that "we really do not face any problems with command and control in the units in combat".²⁵⁰³

(ii) SRK Sniping and Shelling

682. SRK snipers, and mortars and artillery units operated within the SRK's command and control throughout the campaign.

²⁴⁹⁰ N.MIJATOVIĆ:T.30756-30757.

²⁴⁹¹ N.MIJATOVIĆ:T.30756-30757; S.VELJOVIĆ:T.29245,29261-29262; S.SIMIĆ:T.30018; M.VUJASIN:T.31840; D2352,p.1; P5049.

²⁴⁹² R.PHILIPPS:T.3766.

²⁴⁹³ S.SIMIĆ:T.30004-30008; D.ZUROVAC:T.30265; M.SLADOJE:T.30565-30566; R.MAKSIMOVIĆ:T.31570-31571; S.VELJOVIĆ:T.29239-29243; AF2858.

²⁴⁹⁴ R.PHILIPPS:T.3818-3819,3887.

²⁴⁹⁵ R.PHILIPPS:T.3769,3774.

²⁴⁹⁶ R.PHILIPPS:P989,pp.20,22-44; R.PHILIPPS:T.3755-3756,3818-3819.

²⁴⁹⁷ See e.g. R.PHILIPPS:P989,pp.20,22-44(citing following source documents); P1008; P1013; P1019; P1020; P1196; P1197; P1215; P2660. See also P2697; P1005; P2666; P2671.

²⁴⁹⁸ See, e.g., R.PHILIPPS:P989,pp.20,22-44(citing following source documents); P1008; P1018; P1205; P1207; P1212; P1213; P1214; P1216. See also P1203; P2110; P2656; P2668; P2698; P2688; D4646; S.SIMIĆ:T.30084; P.TRAPARA:D2389,para.5; AF2851; AF2852; AF2853; P1009; P1264.

²⁴⁹⁹ P1010; P1208; P2672.

²⁵⁰⁰ S.VELJOVIĆ:D2351,para.16; P1613; P1615; P1616,p.1.

²⁵⁰¹ See e.g. P2702; P2705; P2707; P2709.

²⁵⁰² See e.g. R.PHILIPPS:P989,pp.20,22-44(citing P1016); P1016; P2419; P2420; P1783; P1784. See also AF2857; V.LUČIĆ:T.30784-30785; 1208,p.1.

²⁵⁰³ P992,p.2.

a. SRK Snipers

683. The evidence is overwhelming that SRK snipers shot at innocent civilians in Sarajevo²⁵⁰⁴ almost every day.²⁵⁰⁵ The problem was so acute that local authorities and UNPROFOR erected anti-sniping barricades throughout the city to try to protect civilians from fire from SRK territory.²⁵⁰⁶ GALIĆ, MILOŠEVIĆ, and a number of their subordinates acknowledged that the SRK had snipers²⁵⁰⁷ and that their units had sniper equipment.²⁵⁰⁸ As MILOŠEVIĆ stated, "[a]ll units had sniper rifles. It was our obligation, it was our duty to provide every combat unit with sniper rifles and a dedicated marksman. That principle applied across the board in the entire zone of responsibility [...]."²⁵⁰⁹ GALIĆ acknowledged contemporaneously that the SRK was deliberately sniping civilians.²⁵¹⁰

684. In the Sarajevo context, the term "sniping" encompassed small arms fire, including machine guns, as well as professional sniping by trained snipers with specialized weapons.²⁵¹¹ Machine guns did not require the same precision as a rifle, and also made it possible for non-specialists to hit single targets at ranges they could not reach with an assault rifle.²⁵¹²

²⁵⁰⁴ A.BANBURY:T.13468-13469. *See also* A.VANLYNDEN:P926,paras.47-48; P1069; P1070; P1071; P1072; P1074; KDZ185:P5908,para.8; T.ŽUNIĆ:P496,pp.4,13; P.VANDERWEIJDEN:P1621,p.33; N.ĐOZO:P1978,para.22; AF128; [REDACTED]; M.KUČANIN:P21,p.2; AF123; AF2920.

²⁵⁰⁵ AF129; R.MOLE:P1426,para.86; [REDACTED]; S.ŠABANIĆ:P492,p.10,para.3.

²⁵⁰⁶ D.FRASER:P1762,pp.24-25,33-34; D.FRASER:T.8016-8017,8121; D.HARLAND:T.2027-2028; D.HARLAND:P820,para.25; M.BELL:P1996,para.35; P2012; J.BOWEN:P2068,para.17; A.VANLYNDEN:P926,paras.47-48; [REDACTED] P2407,pp.10-11; [REDACTED] P6060,p.13; [REDACTED]; P5906,para.64; [REDACTED] T.ŽUNIĆ:P496,pp.4,13; AF123; P1069; P1070; P1071; P1072; P1074; P.VANDERWEIJDEN:P1621,p.33; N.ĐOZO:P1978,para.22; AF128. [REDACTED]; M.KUČANIN:P21,p.2.

²⁵⁰⁷ D.MILOŠEVIĆ:T.32820; S.GALIĆ:T.37465-37466,37466,37478,37838-37840,37842-37844,38060-38061; D.MALETIĆ:D2519,para.31; [REDACTED] P1938,para.43; P1601,p.4. *See also* A.VANBAAL:P1818,paras.51-53. *See also* D.FRASER:T.8025P1785; AF2808; P1618; P.VANDERWEIJDEN:T.6948-6949; P1600,p.5; AF2808.

²⁵⁰⁸ D2422; P5930; P5991; P5976; P5945; P6014; S.GUZINA:T.31161,31165-31166; S.DZINO:T.29881-29883,29920; [REDACTED] P1938,paras.48,50; P1946; AF2812; S.GALIĆ:T.37202.

²⁵⁰⁹ D.MILOŠEVIĆ:T.32818-32820.

²⁵¹⁰ *See* IV.D.2.(a): GALIĆ.

²⁵¹¹ R.MOLE:P1426,para.88. *See also* J.WILSON:P1029,para.58; P.VANDERWEIJDEN:P1621,pp.3,107; P.VANDERWEIJDEN:T.6950-6951; D.MILOŠEVIĆ:T.32820-32821; D.FRASER:P1762,p.30; F.THOMAS:P1558,para.65; P1772 .

²⁵¹² P.VANDERWEIJDEN:P1621,p.107; P.VANDERWEIJDEN:T.6949-6950; R.THOMAS:P1558,para.65.

685. The existence and location of snipers was so well known that not only UNPROFOR,²⁵¹³ but even ordinary civilians learned their identity and location. [REDACTED]

[REDACTED]²⁵¹⁴

i. SRK control of snipers

686. International military officers and commanders serving in Sarajevo consistently concluded that Serb snipers around the city were centrally controlled,²⁵¹⁵ and "perfectly integrated into the military system," with the "specific mission of maintaining pressure through terror."²⁵¹⁶ Snipers and their actions were "controlled and regulated at the corps level," a "corps asset," and "personally controlled by the corps commander."²⁵¹⁷ In short, snipers operated as a "tool of the management."²⁵¹⁸

687. Central control of SRK snipers was also manifest by the fact that when the BSL wanted the sniping to stop, it did.²⁵¹⁹ The Anti-Sniping Agreement²⁵²⁰ resulted in a marked reduction in incidents,²⁵²¹ at a level which showed "a total and absolute control" over sniping.²⁵²²

688. SRK orders further reflect the chain of command under which sniping operated:

- In November 1992, SRK Deputy Commander MARČETIĆ ordered all SRK units to identify and prepare locations for snipers, to position those snipers,

²⁵¹³ D.HARLAND:P820,para.301; D.FRASER:P1762,pp.13-14,24,27-30; D.FRASER:T.8017;

[REDACTED]. See also [REDACTED].

²⁵¹⁴ [REDACTED] T.13196-13197,13200,13232; [REDACTED]

²⁵¹⁵ [REDACTED] P2407,pp.8,10; [REDACTED] P5906,paras.27,67-68,75; [REDACTED] T.10574;

[REDACTED] T.13041,13093-13095,13129-[REDACTED]

[REDACTED] T.4216,4218; A.VANBAAL:T.8534-8535; A.VANBAAL:P1818,paras.50,58;

R.THEUNENS:P3033,pp.21,352,452-454; J.HAMILL:P1994,pp.160,167-168; M.ROSE:T.7267.

²⁵¹⁶ KDZ185:P6060,p.14. See also M.ROSE:T.7267.

²⁵¹⁷ D.FRASER:T.8014,8018,8022; D.FRASER:P1762,pp.25,30-31; H.ABDEL-RAZEK:T.5508-5509;

[REDACTED] P2407,pp.810; KDZ450:P5906,pp.17-18; P.VANDERWEIJDEN:P1621,p.4. See

also P.VANDERWEIJDEN:T.69446; P1617,p.2.

²⁵¹⁸ J.HAMILL:P1994,p.160.

²⁵¹⁹ D.HARLAND:P820,paras.63-64; D.FRASER:P1762,p.41; D.FRASER:T.8018;

A.VANBAAL:P1818,paras.48-50; A.VANBAAL:T.8533-8535; [REDACTED] P5906,paras.24,105;

[REDACTED] (confidential); M.ROSE:P1638,paras.205-207

[REDACTED] P2447,p.35.

²⁵²⁰ P861,p.4. See also P863; AF2789.

²⁵²¹ P864; P1772; P1773,pp.3-4; D1164; KDZ182:P2447,p.35; AF2860.

²⁵²² M.ROSE:P1638,paras.139-141,205. See also KDZ450:P5906,para.70.

and to notify the command if more snipers, sniper rifles or night vision equipment was needed.²⁵²³

- GALIĆ issued an order to the SRK command on 29 October 1993 that each brigade set up a "platoon-strength snipers group (30 + 1 soldiers)" to be equipped with sniper rifles and other sniping equipment to immediately start carrying out assignments.²⁵²⁴ Brigades promptly reported back, detailing the numbers of snipers they had trained and the weapons they used.²⁵²⁵
- On 29 July 1994, MILOŠEVIĆ issued orders requiring improvement of reporting systems and sniping activities.²⁵²⁶ On 30 July 1994, SRK Brigade Commander ŠHOVAC promptly ordered the SRK 2nd Infantry Battalion command to select new positions and targets for snipers, to issue snipers precise tasks, to use silencers and to conserve ammunition.²⁵²⁷

ii. Proficiency of snipers

689. The duration of the war and the static confrontation line around Sarajevo allowed SRK snipers to become highly proficient at their deadly task. In addition to their targeted shooting every day, snipers on higher ground could and did take practice shots at clearly identifiable objects to establish their settings and ensure greater accuracy of future shots.²⁵²⁸ The SRK also held training courses for snipers and sniper instructors.²⁵²⁹ MILOŠEVIĆ said that snipers were carefully selected according to a number of criteria.²⁵³⁰

690. International observers concluded that SRK snipers were very skilled, as demonstrated when a French soldier on anti-sniping duty conducting observations

²⁵²³ P1010; P.VANDERWEIJDEN:T.7195-7196. *See also* D2839.

²⁵²⁴ D2902.

²⁵²⁵ P5930; P5945; P6014; P5976; P5991.

²⁵²⁶ P1763; P1208.

²⁵²⁷ P1208.

²⁵²⁸ P.VANDERWEIJDEN:T.6949-6951,6956-6957; P1619,p.1; D.FRASER:P1762,p.31.

²⁵²⁹ P1612,p.6; P1616,p.1; P1613; P1615; D.FRASER:T.8020-8022; P1783,p.3; P1784,p.4. *See also* P.VANDERWEIJDEN:T.6943-6945; P1616.

²⁵³⁰ D.MILOŠEVIĆ:T.32820. *See also* S.GALIĆ:T.37465,37466,37838-37840,37842,38060-38061.

through a small window was fatally shot in the head from SRK positions 200-300 metres away. The shot, witnesses agreed, "required very, very high skills."²⁵³¹

691. Their deadly proficiency belies any notion that they "accidentally" struck their targets. By 1994, when FRASER arrived in Sarajevo, he saw sniping to be primarily a terrorist activity, confined to "professional" sharpshooters. "All the amateurs," he said, "were long gone."²⁵³²

iii. Sniping locations

692. The geographical layout of SRK-held territory provided particular opportunities for sniping.²⁵³³ Certain locations in Sarajevo were notorious sniping "hotspots",²⁵³⁴ including the Marin Dvor area around the Holiday Inn.²⁵³⁵ The area south of the Miljacka River was recognised as conducive for snipers to get into good positions and find targets of opportunity.²⁵³⁶ GALIĆ, as well as his subordinates, confirmed SRK snipers operated from the skyscrapers in Grbavica, and from the Metalka 1 and 2 buildings.²⁵³⁷

693. Snipers were deployed to protected locations above and around the city, over the areas of responsibility of at least three SRK brigades. Their disposition and consistent behaviour underscores the central organisation of their deliberate attacks against civilians.²⁵³⁸

b. SRK artillery

694. The SRK employed a large number of heavy weapons in Sarajevo, including a range of anti-aircraft guns; 60, 82 and 120 mm mortars; direct fire weapons that

²⁵³¹ ██████████:T.10555-10556; D.FRASER:P1762,p.35; D.FRASER:T.8020.

²⁵³² D.FRASER:P1762,p.24. *See also* D.FRASER:T.8019-8021; D.HARLAND:P820,para. 301.

²⁵³³ AF119; AF121; A.VANLYNDEN:P926,paras.46,50; R.MOLE:P1426,para.87;

D.HARLAND:P820,para.294; F.THOMAS:P1558,paras.65-66; T.KNUSTAD:P152,p.4; P2041.

²⁵³⁴ H.ABDEL-RAZEK:P1258,p.24; A.VANLYNDEN:P926,para.47; M.KUČANIN:P16,pp.98-121; P22; P2012; AF69-AF70; AF75-AF81; AF92; AF108; AF120; AF122; AF125; AF2919.

²⁵³⁵ J.BOWEN:T.10111-10113; P2076; H.ABDEL-RAZEK:P1258,p.24; S.ŠABANIĆ:P492,p.10,para 6; M.KUČANIN:P21,p.2; ██████████; ██████████; S.MOROZ:D2373,p.26; A.VANLYNDEN:P926,para.48; AF124; AF2915; AF2916. *See also* AF2917-AF2918.

²⁵³⁶ D.FRASER:P1762,pp.13-14.

²⁵³⁷ *See* Brief,fn.2507.

included 76 and 100 mm T-12 guns, 105mm, 122mm and 155mm howitzers, as well as tanks.²⁵³⁹ They enjoyed weapons superiority in the Sarajevo theatre throughout the conflict.²⁵⁴⁰

i. SRK control of artillery

695. Numerous SRK officers confirmed the command authorisation required to use mortars and artillery,²⁵⁴¹ which continued under MILOŠEVIĆ's tenure as well.²⁵⁴² Heavy artillery was directly controlled by brigades and the Corps.²⁵⁴³

696. In some instances, the authorisation went higher up the chain of command. In a 7 February 1994 order to the VRS-GŠ and the SRK, **KARADŽIĆ** insisted on direct control over approving the opening of fire in Sarajevo.²⁵⁴⁴

697. MLADIĆ, through the VRS-GŠ, exercised direct operational control over the use of artillery weapons at various points throughout the conflict,²⁵⁴⁵ such as orders requiring direct VRS-GŠ authorization for firing²⁵⁴⁶ or temporarily banning firing.²⁵⁴⁷ Moreover, MABs (discussed more fully below),²⁵⁴⁸ were VRS-GŠ assets, and their use was contingent on orders or approval from the VRS-GŠ.²⁵⁴⁹

²⁵³⁸ D.FRASER:P1762,p.25; D.FRASER:T.8022-8023; P880; P1052; D2788; P1613; AF126; KDZ182:T.13093.

²⁵³⁹ See, e.g., P1494; [REDACTED]; P1506; P2008; [REDACTED]; P1077; [REDACTED]; D3383. See also P6301; P5056; P2319; P1599; D782; P1314; P5990P1077; P1506; P1496; AF2811.

²⁵⁴⁰ D.FRASER:P1762,p.52; [REDACTED]; J.WILSON:P1029,paras.27-31,43,48-50; J.WILSON:T.4044-4046. See also P1274; R.MOLE:P1426,para.135; F.THOMAS:P1558,para.71; M.ROSE:P1638,para.50; A.VANLYNDEN:T.2467; M.BELL:P1996,para.56; D.HARLAND:T.2133; AF2811; AF2813; P01314; D312,p.3; P1593, P1594; P1595; P1596; P1599; P5990; [REDACTED]; D336,p.2; P1021; D779. Compare P5968,p.3. See also P2668,p.1. See also AF2810.

²⁵⁴¹ See, e.g., S.GENGO:T.29771; S.SIMIĆ:D2412,paras.17,20,29; S.SIMIĆ:T.30045; I.GOLIĆ:D2665,para.15; M.INDIĆ:D2774,para.32.

²⁵⁴² See IV.D.2: GALIĆ and MILOŠEVIĆ supervised the SRK's implementation of the campaign of terror.

²⁵⁴³ S.GALIĆ:T.37195,37201. See also R.PHILIPPS:P989,p.19.

²⁵⁴⁴ P846/P3053(duplicates). See IV.C.1-2, IV.E.1.(a).(i).

²⁵⁴⁵ See IV.E.2.(a)(i): Scheduled incidents G1 and G2.

²⁵⁴⁶ P1502,p.1.

²⁵⁴⁷ P1264; P1030,p.1; AF2879.

²⁵⁴⁸ See IV.E.1.(a).(ii).b.iii: SRK Artillery used inaccurate Modified Air Bombs (MABs).

²⁵⁴⁹ See IV.E.1.(a).(ii).b.iii: SRK Artillery used inaccurate Modified Air Bombs (MABs); AF2864; AF2868; P1199; P2675; P2652; P2651; P2653; P2669; P1306; P1286; P1303; P1283.

ii. SRK mortar and artillery locations

698. Serb forces controlled positions in the hills and elevations surrounding Sarajevo, affording vantage-points from which to target ABiH-controlled territory.²⁵⁵⁰ Their topographical advantage is illustrated in news footage from Serb positions above the city.²⁵⁵¹

699. As a result of elevated positions around Sarajevo, the SRK had excellent observation of targets that reached all the way to the centre of the city. **KARADŽIĆ** himself noted this advantage when he told the Assembly in January 1994: "We are keeping an eye on them from Trebević, we can see what they eat, therefore they are in a more difficult situation than we are."²⁵⁵²

700. Witnesses confirmed the SRK had a "fantastic"²⁵⁵³ view over the city.²⁵⁵⁴ KOVAČEVIĆ explained that from their position it was possible to "see which buildings were inhabited by civilians."²⁵⁵⁵ Similarly, TUŠEVLJAK noted that from his unit's position near Ozrenska Street,²⁵⁵⁶ they could distinguish civilians in Muslim territory by direct observation: "We also often saw civilians cutting firewood or digging in their gardens or children sledding".²⁵⁵⁷

iii. SRK artillery used inaccurate modified air bombs

(MABs)

²⁵⁵⁰ AF119; A.VANLYNDEN:P926,paras.17-18,46,50,87,155; P815; J.BOWEN:P2068,paras.14,29-30; J.BOWEN:T.10190; P1997; P1998; H.ABDEL-RAZEK:P1258,p.22; J.WILSON:P1029,para.48; D3383; M.KUČANIN: [REDACTED] P22; P1494; D3382; P1021/blow up P1052; D2788; P1593; P1764; D02342; P1496; [REDACTED]; P1478,pp.282-284; P1058; D674; D497; D2791; D633,p.1; AF23; AF66-AF68; AF72-AF74; AF79-AF80; AF82-AF86; AF91; AF101-AF102; AF104-AF107; AF2824-AF2828; AF2830-AF2838; AF2840-AF2847; AF3016; D.FRASER:P1762,pp.11-20.

²⁵⁵¹ A.VANLYNDEN:P926,paras.76-82; P842; P933. *See also* [REDACTED]; [REDACTED]; M.BELL:P1996,paras.84-86; P1998; P2008; P1077; P1496; P1478,pp.282-284.

²⁵⁵² P1385,p.112.

²⁵⁵³ [REDACTED]

²⁵⁵⁴ M.DŽIDA:D2375,para.24; B.KOVAČEVIĆ:T.29068,29073-29074 ; S.SIMIĆ:T.30057. *See also*: H.PALO:P120,p.17; AF130.

²⁵⁵⁵ B.KOVAČEVIĆ:T.29072-29073.

²⁵⁵⁶ S.TUŠEVLJAK:D2391,paras.16,26.

²⁵⁵⁷ S.TUŠEVLJAK:D2391,para.22.

701. MABs were unguided,²⁵⁵⁸ highly inaccurate and highly destructive weapons that were solely in the possession of the VRS with regard to Sarajevo, and under the VRS-GŠ's strict command and control. VELJOVIĆ admitted that they could be off-target by huge margins and were therefore impermissible for use in urban areas—"because there was a risk that we might actually hit our own men or civilians".²⁵⁵⁹

702. At least two types of MABs (FAB-100 and FAB-250) were used in Sarajevo.²⁵⁶⁰ They were constructed by joining aircraft bombs to the rocket motors of multiple-barrel rockets such as the 122mm GRAD rocket and the 128mm OGANJ rocket²⁵⁶¹ and were fired from improvised launchers that were attached to the back of a truck.²⁵⁶²

703. MABs were introduced into the VRS arsenal in early 1994 through MLADIĆ and the VRS-GŠ working with PERIŠIĆ and the VJ, and were constructed at the SRK-controlled *PRETIS* factory in Vogošća.²⁵⁶³

704. MABs were VRS-GŠ assets and deployed in Sarajevo in 1994 and 1995.²⁵⁶⁴ A 12 June 1994 order from the VRS-GŠ explained: the "VRS-GŠ decides on the use of aerial bombs and possibly a Corps if the VRS-GŠ approves so and not a brigade according to its own plan".²⁵⁶⁵ MILOŠEVIĆ was responsible for the use and deployment of MABs in the Sarajevo theatre.²⁵⁶⁶ He was in frequent communication with the VRS-GŠ about them.²⁵⁶⁷

²⁵⁵⁸ D.FRASER:T.8010,8133; E.TURKUŠIĆ:T.8998-9000,9055-9056; E.TURKUŠIĆ:P1925,p.6; B.ZEČEVIĆ:P2318,pp.92-93. *See also* E.SULJEVIĆ:P1276,para.40; M.ŠOJA:P1633,pp.5-6,9-10; H.KONINGS:P1953,paras.42-44.

²⁵⁵⁹ S.VELJOVIĆ:T.29269-29270. *See also* P1310.

²⁵⁶⁰ AF2817; AF2815; AF2819; AF2862; P1629,pp.9-10; P2651; P1301; P1292;P1627,p.2; P1300; P1308; P1303,p.2; P1203; P1304; P2652; P1296.

²⁵⁶¹ B.ZEČEVIĆ:P2318,p.91; E.SULJEVIĆ:P1276,para.39; E.SULJEVIĆ:T.5684. *See also* E.TURKUŠIĆ:P1925,p.6; KDZ304:P2407,p.18.

²⁵⁶² AF2816; B.ZEČEVIĆ:P2318,p.101. *See also* E.TURKUŠIĆ:P1925,p.6; H.KONINGS:P1953,p.14; P5982.

²⁵⁶³ AF2818; B.ZEČEVIĆ:P2318,pp.12,97-98,185-186; P1277; P2320; P1296; P1298; P1287; P1280; P1284; P2321.

²⁵⁶⁴ B.ZEČEVIĆ:P2318,pp.75,107; P2675; P2652; P1294; AF2867; P1299; P1310; P1316; P2675; P1199; P1295; P1311; P6051; S.VELJOVIĆ:T.29271; D.MILOŠEVIĆ:T.33152-33154,33163; P1283.

²⁵⁶⁵ P1294; D.FRASER:T.8014-8015.

²⁵⁶⁶ AF2863-AF2865; AF2867-AF2871; AF2877-AF2878; P1286; P1303; D782,p.1; P1299; P1283; P1309,p.2; D322,p.1; P1198; P1201; D.MILOŠEVIĆ:T.33163-33166,33171-33172,33175; P1309; P1782,p.2; P1201; P1292. *See also* P1285; P1290; P1293; P1288; P1297; P1311.

²⁵⁶⁷ AF2863-AF2864; P1286; P1303; AF2867-AF2868; P1299; P1283; P1306; P1199; P5048; P2669; P1308; P1307; P1302; P1301; P2651.

705. Numerous international observers and other witnesses confirmed that MABs were in the sole possession of the VRS.²⁵⁶⁸ Moreover, the ABiH did not possess the materials or resources necessary to manufacture such weapons within Sarajevo.²⁵⁶⁹

706. MABs were incomparable during the conflict in their high destructive power.²⁵⁷⁰ With an ability to generate casualties at a distance of up to 200m in any direction,²⁵⁷¹ and an estimated 50-60 metre radius of destruction,²⁵⁷² they could destroy an area the size of a football field.

707. MABs were matched in their unusual destructiveness by their inaccuracy and imprecision. Their inaccuracy first stems from the fact that the underlying weapons systems that MABs were composed of—unguided multiple-barrel launched rockets and unguided or "dumb" aircraft bombs—both had wide ranges of dispersion or deviation covering distances of many hundreds of metres.²⁵⁷³ Rockets were area weapons, unsuitable for use in a densely populated location.²⁵⁷⁴

708. Fusing unguided rockets to unguided aircraft bombs in an improvised manner only enhanced the already substantial error inherent in the systems.²⁵⁷⁵ This was due to the following factors:

- There was no adequate testing of MABs.²⁵⁷⁶ Without such testing, there was no reliable set of firing tables to apply to the different types of MABs, or the

²⁵⁶⁸ D.FRASER:P1762,pp.63-64; M.ŠOJA:P1633,p.16; [REDACTED]; T.OVERGARD:P2058,p.23; H.KONINGS:P1953,paras.42,48; KDZ166:T.8350-8351; E.TURKUŠIĆ:T.9000; P.BRENNKAG:P1851,para.38; E.SULJEVIĆ:T.6174-6175.

²⁵⁶⁹ B.ZEČEVIĆ:P2318,pp.187-188.

²⁵⁷⁰ AF2820-AF2821; P1812; [REDACTED]; D.HARLAND:P820,para.210; P895; H.KONINGS:P1953,para.42; E.TURKUŠIĆ:T.9109; E.SULJEVIĆ:P1276,para.37; M.BELL:D921,p.14; M.BELL:P1996,para.100; S.VELJOVIĆ:T.29270; D.MILOŠEVIĆ:T.32768-32769,33149-33150; KDZ477:T.11024; M.ANDELKOVIĆ-LUKIĆ:D2662,para.6.79; I.MIŠČEVIĆ:T.32077; D.ŠKRBA:T.29160-29161; B.ZEČEVIĆ:P2318,pp.28-45.

²⁵⁷¹ B.ZEČEVIĆ:P2318,pp.39-40,50.

²⁵⁷² H.KONINGS:P1953,para.42.

²⁵⁷³ P6347,pp.2-3; P6347,p.4(B/C/S); P6346,p.3; M.POPARIĆ:T.39031,39037;

B.ZEČEVIĆ:P2318,pp.17-25,92.

²⁵⁷⁴ [REDACTED]; M.POPARIĆ:T.39035; B.ZEČEVIĆ:P2318,p.92;

Z.KOVAČEVIĆ:T.30604; Z.SUBOTIĆ:T.38482; S.SIMIĆ:T.30054-30055.

²⁵⁷⁵ H.KONINGS:P1953,para.43; B.ZEČEVIĆ:P2318,pp.82-84; Z.SUBOTIĆ:T.38497,38522; S.VELJOVIĆ:T.29284-29285; E.TURKUŠIĆ:T.8998-9000,9053-9054; E.SULJEVIĆ:P1276,paras.38-39.

²⁵⁷⁶ B.ZEČEVIĆ:P2318,p.95; B.ZEČEVIĆ:T.12180-12181,12220-12222,12225-12226,12229; M.ANDELKOVIĆ-LUKIĆ:T.31469-31470,31494-31496,31498,31504-31505,31516;

different conditions in which they were used.²⁵⁷⁷ Defence expert SUBOTIĆ confirmed that any accurate firing was "impossible" without reliable firing tables.²⁵⁷⁸

- MABs often had multiple rockets attached. If one rocket fired earlier or later than the others, this would cause changes in direction.²⁵⁷⁹
- MABs had a non-aerodynamic shape that was more affected by headwinds, tailwinds, and crosswinds than the underlying weapons.²⁵⁸⁰
- MABs were prone to ricochet. Aircraft bombs were designed to explode after falling from a plane. When fired more horizontally like a rocket, they could fail to explode on first impact and instead ricochet to another location.²⁵⁸¹

709. In light of the above factors, the reality of the MABs was that once one was launched, its flight path could not be managed; it could only be directed at a general area.²⁵⁸²

710. Although Defence expert witness SUBOTIĆ claimed that MABs were relatively precise weapons used by the SRK to target military objects,²⁵⁸³ she was not a credible witness²⁵⁸⁴ and her methodology was fundamentally flawed. She engaged in speculative reverse-engineering by identifying MAB impact locations and then

Z.SUBOTIĆ:T.38634-38635; S.VELJOVIĆ:T.29269-29270,29286. D.MILOŠEVIĆ claimed that some testing was done at Kalinovik testing ground and said "those assets were tested until they ended up with something that could be used in combat." D.MILOŠEVIĆ: [REDACTED]. This, however, was neither corroborated nor credible, and was in any event unspecific as to what type of testing this might have been.

²⁵⁷⁷ B.ZEČEVIĆ:P2318,pp.81,95-100; B.ZEČEVIĆ:T.12220-12222,12225-12226,12228. ZEČEVIĆ allowed for the existence of some "basic firing tables". B.ZEČEVIĆ:P2318,p.99. Documents, however, have never been located and in any event, rudimentary tables would not suffice for accurate firing. B.ZEČEVIĆ:T.12220-12221; Z.SUBOTIĆ:T.38470.

²⁵⁷⁸ Z.SUBOTIĆ:T.38231,38523,38527-38528.

²⁵⁷⁹ E.TURKUŠIĆ:T.8998-9000; B.ZEČEVIĆ:T.12177; Z.SUBOTIĆ:T.38492-38495. *See also* B.ZEČEVIĆ:P2318,pp.80-81.

²⁵⁸⁰ E.TURKUŠIĆ:T.8998-9000. *See also* B.ZEČEVIĆ:P2318,pp.81,95-100; D.FRASER:T.8133.

²⁵⁸¹ B.ZEČEVIĆ:T.12255-12270; Z.SUBOTIĆ: D3540,pp.67,74-106; Z.SUBOTIĆ:38544-38545.

²⁵⁸² AF2821. *See also* T.OVERGAARD:P2058,pp.55-57,71; H.KONINGS:P1953,paras.42-44; E.TURKUŠIĆ:P1925,p.6; D.FRASER:P1762,p.63; [REDACTED] T.8363-8364; A.DEMURENKO:P5925,

p.3.

²⁵⁸³ Z.SUBOTIĆ:D3540,paras.151-155.

²⁵⁸⁴ *See* SIS Shelling Appendix.

measuring the distance to the nearest object that she alleged was a military target.²⁵⁸⁵ Her "most probable target" analysis was devoid of factual basis and outside her area of expertise,²⁵⁸⁶ causing her to assert "targets" that were contradicted by SRK officers,²⁵⁸⁷ and bomb calibres that were contradicted by SRK documents.²⁵⁸⁸ She further displayed her bias (as well as her misapprehension of IHL) when declaring that she considered "Sarajevo as one, more or less single, large military target."²⁵⁸⁹

711. Indeed, VRS officers' own use of MABs indicated they knew it was a highly inaccurate weapon. MILOŠEVIĆ ordered the use of multiple MABs against a particular target expecting that one or more would miss.²⁵⁹⁰ This same inaccuracy also led the VRS to abort a planned attack when SRK forces were 500 metres away from the MAB's intended target,²⁵⁹¹ *i.e.*, they could not be sure they would avoid hitting their own soldiers.

²⁵⁸⁵ Although she claimed her assessment took into account "range testing for similar projectiles" she failed to identify what those projectiles were, as para.173 refers back to para.151, which makes the same claim, again without identifying the alleged "similar projectiles". In any event, these could not have been MABs, as SUBOTIĆ conceded she personally never tested one. *See* Z.SUBOTIĆ:T.38525. She also did not rely on—or even refer to—any firing tables for any MAB system or any contemporaneous test data for any MAB system or launch system. Z.SUBOTIĆ:T.38525,38527. Further reflecting the unsound nature of SUBOTIĆ's alleged range-tested data is the fact that she has imputed the same margins of error for all FAB-100 and FAB-250 MABs, regardless of the number of rocket engines attached to them. Z.SUBOTIĆ:D3540,para.151(DispersionTable). This was despite her acknowledgement that different configurations of rockets would have different masses and propulsive forces, resulting in different ballistic characteristics. Z.SUBOTIĆ:T.38484-38487.

²⁵⁸⁶ *See* Z.SUBOTIĆ:T.38533.

²⁵⁸⁷ *See, e.g.* G10: *Compare* Z.SUBOTIĆ:D3540,para.3&Figure1 with D.MILOŠEVIĆ:T.32783-32784,33155-33164; G11: *Compare* Z.SUBOTIĆ:D3540,para.21,T.38189-38190 with D.MILOŠEVIĆ:T.32776-32777; G12: *Compare* Z.SUBOTIĆ:D3540,pp.68-74,T.38192-38194 with D.MILOŠEVIĆ:T.32776-32778.

²⁵⁸⁸ *Compare* P5943(VRS-GŠ report stating a 250kg bomb used in G10) with Z.SUBOTIĆ:D3540,paras.9,151,DispersionTable(says 100kg).

²⁵⁸⁹ Z.SUBOTIĆ:D3540,Appendix4,p.214.

²⁵⁹⁰ AF2869; P1309. When confronted with these examples in court, MILOŠEVIĆ admitted that where possible situations when air bombs had to over-fly VRS forces were avoided due to the risk that "*the bomb may have landed on our forces*":D.MILOŠEVIĆ:T.33151. He indicated that the same principle applied to residential areas:D.MILOŠEVIĆ:T.33151. He also admitted that in the case of abandoning the MAB attack on the Butmir tunnel, firing was abandoned because "*the degree of caution expressed by this artillery expert was justified*": D.MILOŠEVIĆ:T.33154. When D. MILOŠEVIĆ was confronted with P1309 (his Order to prepare firing of multiple air bombs at a selected target in order to ensure it would be hit), he stated that in order to hit a target they needed four to six MABs:D.MILOŠEVIĆ:T.33165-33166.

²⁵⁹¹ P1310.

712. In short, MABs were highly inaccurate and highly destructive weapons that were "inappropriate" and had "no military value [...] inside an urban area."²⁵⁹² As FRASER stated such weapons sent "shudders through all of us, including the UN."²⁵⁹³

(iii) Other armed forces

713. Other Serb forces, including the JNA, TOs, MUP, paramilitaries and CSs, were used at the outset of the campaign to shell and snipe at the civilian population of Sarajevo. Their role is discussed in more detail below.²⁵⁹⁴

2. The Sniping and Shelling Campaign of Terror

714. Over a span of 44 months Serb Forces persistently attacked civilians,²⁵⁹⁵ overtly civilian objects²⁵⁹⁶ and civilian activities²⁵⁹⁷ in ABiH-held Sarajevo by sniping²⁵⁹⁸ and shelling,²⁵⁹⁹ including through MABs.²⁶⁰⁰ The shelling and sniping campaign—including the illustrative examples in Schedules F and G—comprised acts of violence directed against the civilian population of Sarajevo or individual civilians not taking direct part in hostilities, including indiscriminate attacks and attacks that were disproportionate in relation to the concrete and direct military advantage anticipated. They killed and injured thousands of civilians,²⁶⁰¹ and damaged or

²⁵⁹² D.FRASER:T.8010,8013-8014; D.FRASER:P1762,p.63. *See also* B.ZEČEVIĆ :P2318,p.92; P.BRENNKAG:P1851,paras.5,35,42; T.OVERGAARD:P2058,pp.19-20,72; S.VELJOVIĆ:T.29269-29271; P1310; P2108; ██████████ KDZ304: ██████████ T.KNUSTAD:P123,p.13.

²⁵⁹³ D.FRASER:P1762,p.64.

²⁵⁹⁴ *See* IV.E.2.(a): Beginning of the campaign.

²⁵⁹⁵ A.MULAOSMANOVIĆ:T.6757; N.ĐOZO:P1978,paras.19-20; M.BELL:P1996,paras.33,34,37,71,78,95; P2018; P2005; P1822; P2077; H.KONINGS:P1953,para.32; A.VANLYNDEN:P926,paras.26,60; M.KUČANIN:P23,p.3; AF51; AF53; AF116; AF118.

²⁵⁹⁶ H.PALO:P120,pp.14,15,17; ██████████ KDZ204:P492,p.10; M.KUČANIN:P17,pp.18-19; M.KUČANIN:P27,p.3; AF117.

²⁵⁹⁷ A.MULAOSMANOVIĆ:T.6757; P670; AF2888; ██████████

²⁵⁹⁸ A.BANBURY:T.13468-13469; D.FRASER:T.8018; ██████████ :T10549; P1829; ██████████ ; P1917; ██████████ ; M.KUČANIN:P21,pp.2-3; A.VANBAAL:P1818,para.50; M.BELL:P1996,paras.33,34,57-58,72,83; P2031; P2023; P2004; P2026; P2075; P2074; A.VANLYNDEN:P926,para.49; M.KUČANIN: ██████████ ; P20; M.KUČANIN:P21,pp.2-3,7-8; M.KUČANIN:P21,p.2; M.KUČANIN:P23,pp.4-5; M.KUČANIN:P17,pp.33-35; A.VANLYNDEN:P926,para.26; AF2920.

²⁵⁹⁹ ██████████ P1334; P670; P129; P1065; M.BELL:P1996,paras.33,34,57-58; Y.HAJIR:P1866,para.21.

²⁶⁰⁰ *See* IV.E.1.(a).(ii).b.iii: SRK Artillery used inaccurate Modified Air Bombs (MABs).

²⁶⁰¹ E.TABEAU:P4997,pp.4-7; E.TABEAU:P4998,pp.3-6; E.TABEAU:P5002,pp.3-7; B.NAKAŠ:P1525,paras.1-7,9-10,59,61-62,69,71-82,92; B.NAKAŠ:T.6730-6733,6675-6676,6681-6685; P1242; M.MANDILOVIĆ:P1217,paras.80,82-83,90-91; AF49; AF109; AF2887. *See also* M.BELL:P1996,para.37; P2018; R.MOLE:P1426,para.77; P1581; P2077; M.KUČANIN:P23,pp.2-4; F.ZAIMOVIĆ:P814,paras.9,16-18; F.ZAIMOVIĆ:T.1871-1873,1881-1883; P818; P819; S.DŽEVLAN:P2291,pp.42-43; Y.HAJIR:P1866,paras.1,48.

destroyed countless civilian objects²⁶⁰² in ABiH-controlled territory. Witnesses from all walks of life and experience, many of whom had served in conflict situations, all made the same determination: The purpose of the shelling and sniping of Sarajevo was to terrorise the population.²⁶⁰³

715. Specific instances of the sniping and shelling campaign can be found in the Appendices for Schedules F and G.

(a) Beginning of the campaign

716. Events in and around Sarajevo in early 1992 paved the way for the sniping and shelling campaign that started in April 1992. In coordination with the SDS, the JNA armed the Serb population in and around the city.²⁶⁰⁴ As GAGOVIĆ explained to an interlocutor pleading for an end to the shelling and destruction of Muslim settlements in early May, "this party [the SDS] has significant influence...they are armed *en masse*. They picked up the arms from Faletići. They have lethal weapons at their disposal."²⁶⁰⁵ In what BJELICA called the SDS party's "greatest success," SDS "activists" and Serb TO had looted the Faletići TO warehouse in April 1992, aided by troops under the command of MILOŠEVIĆ.²⁶⁰⁶

717. Senior RS MUP personnel, including MANDIĆ, STANIŠIĆ and KARIŠIK, JNA officers such as GAGOVIĆ, and local SDS leaders with close ties to **KARADŽIĆ** including TINTOR, cooperated in implementing the early stages of the shelling and sniping campaign.²⁶⁰⁷ **KARADŽIĆ** demonstrated his early control over the campaign when he told STANIŠIĆ on 2 May that "our lot will start hitting the city" and destroy Sarajevo if the exchange of KUKANJAC and IZETBEGOVIĆ situation was not resolved.²⁶⁰⁸ Similarly, on other occasions **KARADŽIĆ** ordered the firing to cease when EC monitors were surveying Serb positions or during cease fire talks.²⁶⁰⁹ **KARADŽIĆ** demonstrated his control over these early events when—three

²⁶⁰² M.BELL:P1996,para.41; R.MOLE:P1426,para.73; D.HARLAND:P820,para.27; P2015; J.WILSON:P1029,paras.48-49.

²⁶⁰³ H.OKUN:P776,p.70; A.BANBURY:P2451,paras.197-199; [REDACTED]; A.GIČEVIĆ:T.7614.

²⁶⁰⁴ P979/P3917(partial duplicates); P1477,pp.361-363; KDZ290:P17,pp.5,8,17.

²⁶⁰⁵ P6071,p.8.

²⁶⁰⁶ P6072,p.3; M.GAGOVIĆ:T.31882-31885; P5629; S.VELJOVIĆ:T.29258-29261.

²⁶⁰⁷ D1217; P5667; P6075 ; P6073. *See also* M.KUČANIN:P23,pp.8-9; P2041.

²⁶⁰⁸ P2330. **KARADŽIĆ**'s control over the RS MUP, TO, and SDS is discussed in III.C.8.(a),(h),(i),(k).

²⁶⁰⁹ P5702; D920

weeks into the conflict—he toured the frontlines around the city with international media, saying they could take Sarajevo "anytime."²⁶¹⁰

718. Serb TO and MUP forces, with JNA support,²⁶¹¹ began attacking civilian areas in early April 1992,²⁶¹² Their repeated targeting of civilian areas reveals that terror was the primary purpose of the campaign from the outset. As TINTOR made clear in his 1 May instruction to hit a village above the "Zrak" company: "You can't miss, it's all Muslim."²⁶¹³

719. Similarly, on 8 April 1992, the Pale municipality TO opened fire on Vratnik and the old part of the city of Sarajevo.²⁶¹⁴ Two days later mortar fire was "again" directed at features in the centre of Sarajevo with the results that "fear and panic" reigned and citizens of all ethnicities were moving out from the town.²⁶¹⁵

720. After failing to obtain agreement from BiH authorities to divide the assets and physical property of the Sarajevo television station in half in mid-April, Serb authorities in Pale gave the station an ultimatum to go off the air within 30 minutes or be shelled on 18 April. The station was then hit by Serb mortar fire, killing two people. DOYLE publicly condemned **KARADŽIĆ** for the attack on the basis of his admission that Serb forces had perpetrated the attack, his false assurances to DOYLE that he would prevent it, and his direct control over Serb forces.²⁶¹⁶ The TV building was targeted again the following month, along with civilian settlements.²⁶¹⁷

721. On 2 May 1992, KARIŠIK acknowledged that his MUP forces had fired on the "Old Town" and Nedžarići.²⁶¹⁸

722. From the beginning, terror was threatened as a retaliatory tool. On 21 April 1992, KARIŠIK threatened to launch an attack on Baščaršija if the other side attacked Vraca.²⁶¹⁹ Two days later MANDIĆ similarly threatened to "level" Sokolović

²⁶¹⁰ P1997; M.BELL:P1996,para.43.

²⁶¹¹ See Brief,fn,2607-2610.

²⁶¹² P5718; P5611; P940/alternate version of P5699; P5627; P5644; P5600; P5694; P5706; M.KUČANIN:P23,p.8; D495; P2849; P6071; P925,p.3; P5704; P5720; P2041; R.DONIA:P973,p.53.

²⁶¹³ P5697.

²⁶¹⁴ P06094. See also P925.

²⁶¹⁵ P925.

²⁶¹⁶ C.DOYLE:P918,pp.31-34; P2045.

²⁶¹⁷ P6071.

²⁶¹⁸ P5627.

²⁶¹⁹ P5706.

Kolonija if anything moved in Ilidža.²⁶²⁰ MLADIĆ stated on 11 May that if a threat came from the Muslim side (DIVJAK) would sentence first himself "and the entire Sarajevo to death."²⁶²¹

723. Artillery positions north-west, east, north-east and south-east of the city were established by TO and JNA forces by the end of April 1992.²⁶²² [REDACTED]

[REDACTED] „²⁶²³
They were used against the city.²⁶²⁴

724. Chetnik *Vojvoda* ALEKSIĆ, received his title from ŠEŠELJ in May 1993²⁶²⁵ and was a member of the the SRS since its inception,²⁶²⁶ commanded a paramilitary unit throughout the war²⁶²⁷ that controlled the Serb frontline at the Jewish cemetery.²⁶²⁸ This was a notorious source of shelling and sniping during the entire conflict.²⁶²⁹ His unit was immediately subordinated to the SRK when the SRK came into existence,²⁶³⁰ receiving support and ammunition from the Corps,²⁶³¹ the MUP²⁶³² as well as the SRS.²⁶³³ ALEKSIĆ was commander of the 3rd Company, 3rd Battalion of the 1.Smbr at the Jewish Cemetery, known as the Novo Sarajevo Chetnik Detachment.²⁶³⁴

²⁶²⁰ P1124; P5599(alternate versions).

²⁶²¹ P6070,p.2.

²⁶²² [REDACTED]. Regarding **Hreša** See maps at:P1496; P1077. See also P1478,pp.282-284; P2008. A.VANLYNDEN:P926,paras.76-82; P842; P933; M.BELL:P1996,paras.84-86; P1998; P2008; P1077; P1496; P1478,pp.282-284. Regarding **Paljevo**:

²⁶²³

²⁶²⁴ **Paljevo**: [REDACTED] T.8367-8368; [REDACTED] T.12097-12098; B.SELIMOVIĆ:P44,p.21; B.SELIMOVIĆ:P46,p.6; M.KUČANIN:P16,pp.87-88; M.KUČANIN [REDACTED] P22; P23,p.7; **Hreša**: A.VANLYNDEN:P926,paras.76-82; P842; P933; M.BELL:P1996,paras.84-86; P1998. See also [REDACTED]; P1077.

²⁶²⁵ V.ŠEŠELJ:D3665,para.62.

²⁶²⁶ P5035,p.1.

²⁶²⁷ B.KOVAČEVIĆ:T.29056.

²⁶²⁸ [REDACTED]; M.DAVIDOVIĆ:T.15463.

²⁶²⁹ See SIS.A.1. See also AF3016; D497.

²⁶³⁰ [REDACTED]. See also R.MAKSIMOVIĆ:T.31577-31578;

V.ŠEŠELJ:D3665,para.62.

²⁶³¹ [REDACTED]; B.KOVAČEVIĆ:T.29056; P5931; P5930.

²⁶³² P6057.

²⁶³³ KDZ310:P1938,para.30.

²⁶³⁴ D.ŠOJIC:T.31737-31738,31760-31762; M.MANDIĆ:T.4646; M.MANDIĆ:P1113,p.8; A.VANLYNDEN:P926,paras.109-112; KDZ310:P1938,para.30; R.THEUNENS:P3033,pp.445-446,447,449.

725. In the initial weeks following MLADIĆ's appointment, from 14 May to late June 1992, there was constant daily shelling of Sarajevo with only brief respites.²⁶³⁵ Mixed calibre artillery fire was launched daily into the city during this time, aimed at general areas as opposed to any specific target.²⁶³⁶ The indiscriminate shelling even affected PLAVŠIĆ who had not yet evacuated central Sarajevo, and complained on 14 May to the MUP secretary that it was "a horror" that her own building was being shelled, asking: "do they [Serb forces] really have to shell civilian targets?"²⁶³⁷ The shelling continued, with a substantial volume of indiscriminate heavy artillery fire directed towards the city centre in the days that followed.²⁶³⁸

726. In June 1992, BELL filmed Serbs "walking their mortar fire across Sarajevo, and onto the old town;" and repeated mortar shelling of the city's main shopping street at lunchtime the next day. "To say that the daily lives of these people is intolerable is an understatement," he reported, "There is no safe place or time."²⁶³⁹

(i) Scheduled Incidents G1 and G2

727. As noted above,²⁶⁴⁰ throughout the second part of May 1992, as the shelling of Sarajevo continued,²⁶⁴¹ MLADIĆ made repeated ominous threats,²⁶⁴² including a promise to "retaliate against the town" if a single bullet were fired at Serb-held barracks or if a single soldier were wounded.²⁶⁴³ He emphasized: "Sarajevo will shake, more shells will fall on per [*sic*] second than in the entire war so far."²⁶⁴⁴ These threats culminated as MLADIĆ assumed personal command over the execution of a massive bombardment that took place on 28-29 May 1992. [REDACTED]

[REDACTED] using a limited

²⁶³⁵ J.WILSON:P1029,paras.7,41-43,51,55-57,73,83; J.WILSON:T.3918; P1991,pp.65-87; A.BEGIĆ:T.9957-9958; P947; P6094; P944; P937,p.2); C.DOYLE:P918,pp.51-52; P6073.

²⁶³⁶ J.WILSON:T.4131-4133. *See also* M.KRAJIŠNIK:T.43333.

²⁶³⁷ P2234.

²⁶³⁸ J.WILSON:P1029,paras.64-66.

²⁶³⁹ P2005.

²⁶⁴⁰ *See* IV.C.4: KARADŽIĆ brought in MLADIĆ and approved his plans for the campaign of terror.

²⁶⁴¹ *See* Brief,para.725.

²⁶⁴² P6070; P1041; J.WILSON:P01029,paras.71-76; WILSON:T.3921-3922;4053-4057; P5672; P956,p.36; P5693; P5670; P5673,p.2; P5657,p.2).

²⁶⁴³ P1041,p.1.

²⁶⁴⁴ P1041,p.1.

²⁶⁴⁵ [REDACTED].

²⁶⁴⁶ [REDACTED].

ABiH military action as a pretext to launch the onslaught.²⁶⁴⁷ The shelling lasted 24 hours during night and day, and employed around 200 artillery pieces located around Sarajevo,²⁶⁴⁸ including twelve 130mm cannons and even MBRLs,²⁶⁴⁹ area weapons not suitable for use in urban areas (G1).²⁶⁵⁰ During the operation, MLADIĆ gave orders to shell entire areas of the city,²⁶⁵¹ selecting neighbourhoods where, in his words, "there is not much Serb population."²⁶⁵² Described by observers as "terrible" and "horrible,"²⁶⁵³ the attack hit "everything," including housing and accommodation buildings,²⁶⁵⁴ and had calamitous effects.²⁶⁵⁵ The manifest illegality of this all-out shelling was highlighted by [REDACTED] [REDACTED]

[REDACTED] JNA efforts to disassociate themselves from MLADIĆ's "personally directed ... artillery attack," which they "deplored."²⁶⁵⁷ The attack was condemned by the UNSC²⁶⁵⁸ and the SG.²⁶⁵⁹ Even Slobodan MILOŠEVIĆ described it as a "bloody, criminal" bombardment of the civilian population of Sarajevo.²⁶⁶⁰ In the face of overwhelming international pressure from all sides to end the attack, KARADŽIĆ called MLADIĆ to stop the bombardment.²⁶⁶¹

728. With the evacuation of the last JNA personnel from barracks inside the inner ring of Sarajevo,²⁶⁶² the SRK launched a second massive bombardment of the city centre on or about 6 June 1992 (G2). Some of this bombardment was captured on video by VANLYNDEN, who observed in one report on a massive nighttime shelling that it appeared "Sarajevo was being deliberately obliterated."²⁶⁶³ In addition to the

²⁶⁴⁷ P5663,p.7.

²⁶⁴⁸ J.WILSON:P1029,para.48; [REDACTED]; P1991,p.72

²⁶⁴⁹ P1514; P1513; [REDACTED]; J.WILSON:T.3922-3924.

²⁶⁵⁰ S.SIMIĆ:T.30054-30055; [REDACTED]; Z.KOVAČEVIĆ:T.30604;

M.POPARIĆ:T.39035; Z.SUBOTIĆ:T.38482.

²⁶⁵¹ P1518; P1521; P1522; P1511.

²⁶⁵² P1518.

²⁶⁵³ P5663,pp.8-9,15.

²⁶⁵⁴ [REDACTED].

²⁶⁵⁵ J.WILSON:T.3918,T.3922-3924; [REDACTED]; P1042,para.2;

P5663,pp.8-9,15. Among the civilian casualties include those listed in the appended Sarajevo Victim List.

[REDACTED]; [REDACTED]. *See also*

A.FAZLIĆ:P470,pp.3-4; F.TARČIN:P498,pp.4-5; P1991,p.71.

²⁶⁵⁷ P1042,pp.1-2.

²⁶⁵⁸ P1031.

²⁶⁵⁹ P5050

²⁶⁶⁰ P1036; P1035; P945,pp.3-5.

²⁶⁶¹ P1036.

²⁶⁶² [REDACTED]; D232. *See also* P998; P1498.

²⁶⁶³ A.VANLYNDEN:P926,para.53; P929.

"wild, scattered"²⁶⁶⁴ artillery attacks using a variety of shells across the city,²⁶⁶⁵ SRK forces showed their ability to direct concentrated fire when they wished with a shelling attack on the Maršal Tito barracks to destroy heavy weapons left behind following the JNA evacuation of the complex.²⁶⁶⁶

729. But the "intense" bombardment mainly hit many parts of the city with no apparent military targets,²⁶⁶⁷ resulting in a large number of civilian casualties.²⁶⁶⁸ Locations and victims in residential areas included apartments housing refugees,²⁶⁶⁹ and civilians putting out fires or fleeing to shelter.²⁶⁷⁰ By the evening of 7 June, with "the whole city becoming the target," Sarajevo was "all shaking" with "no district spared."²⁶⁷¹ After several days, the Bosnian Serb Presidency ordered the shelling halted,²⁶⁷² and the next day **KARADŽIĆ** wrote to CUTILEIRO appealing for the resumption of negotiations, saying the Serbs were prepared to stop artillery fire around Sarajevo.²⁶⁷³

(b) The campaign from summer 1992 through spring 1995

730. Following the massive artillery attacks in May and June 1992, the city of Sarajevo settled into a routine for the next three years where the abnormal—targeting of civilians through sniping and shelling—became normal; part of the daily reality of the city.²⁶⁷⁴ The city was frequently subjected to indiscriminate shelling that served no discernable purpose²⁶⁷⁵ other than to sustain the environment of terror.²⁶⁷⁶ People had to dodge sniper bullets throughout the war.²⁶⁷⁷

²⁶⁶⁴ A.VANLYNDEN:P926,paras.56.

²⁶⁶⁵ A.VANLYNDEN:P926,paras.53,55-60; P932; P929; P930; P931; [REDACTED]; J.WILSON:T.3918,3929-3931,4090-4091,4131-4132; J.WILSON:P1029,para.91; P1033; Z.AVDIĆ:P500,paras.3-5; Z.GRANILO:P499,paras.2-3; F.PALAVRA:P497,paras.2-6.

²⁶⁶⁶ A.VANLYNDEN:P926,para.55; P930; R.DONIA:P973,pp.85-86,89.

²⁶⁶⁷ VANLYNDEN:P926,paras.53,55,57.

²⁶⁶⁸ Among the civilian casualties include those listed in the appended Sarajevo Victim List, showing at least 17 confirmed civilian deaths and 28 wounded from the evidence presented at trial alone. *See also* P931; P932.

²⁶⁶⁹ Z.AVDIĆ:P500,para.1; Z.GRANILO:P499,para.2; F.PALAVRA:P497,paras.2-3; F.MUJANOVIĆ:P1865,paras.4-5.

²⁶⁷⁰ Z.AVDIĆ:P500,paras.2-8; Z.GRANILO:P499,paras.2-3,6-7); F.PALAVRA:P497,paras.2-8; F.MUJANOVIĆ:P1865,paras.8-12.

²⁶⁷¹ P932.

²⁶⁷² D428.

²⁶⁷³ D1509.

²⁶⁷⁴ J.WILSON:P1029,para.56; M.BELL:P1996,paras.33,54; R.MOLE:P1426,para.77. *See also* AF48; AF135-AF136,AF139; T.KNUSTAD:P123,pp.13-14.

²⁶⁷⁵ Z.MEĐEDOVIĆ:P129,pp.3-4; H.PALO:P119,p.2; [REDACTED]; M.KUČANIN:P23,pp.8-9; D.HARLAND:P820,paras.32-33,290; [REDACTED]:T.4182-4183;

731. Through periods of fluctuation and varying intensity, the sniping and shelling of civilians remained an enduring feature of the conflict in and around Sarajevo.²⁶⁷⁸ Senior, experienced UN military personnel on the ground in Sarajevo at different periods throughout the entirety of the campaign made strikingly similar observations about its characteristics. ABDEL-RAZEK, UNPROFOR Sarajevo Sector Commander from August 1992 to February 1993,²⁶⁷⁹ described "intense" shelling and sniping, stressing that "the Serbs shelled everywhere in Sarajevo, indiscriminately into civilian centres. These were not military targets."²⁶⁸⁰ Senior UNMO MOLE, in Sarajevo from September to December 1992,²⁶⁸¹ and his team dealt with sniping everyday, in virtually all locations in the city.²⁶⁸² [REDACTED]

[REDACTED] From May-August 1993²⁶⁸⁵ UNMO HAMILL experienced shelling so constant that "one small shelling wouldn't stand out after all this time"—"it was just one in a long, long list of incidents."²⁶⁸⁶ Senior UNMO THOMAS in Sarajevo from October 1993 to July 1994,²⁶⁸⁷ saw a pattern of "indiscriminate [...] Serb shelling, underscored by the fact that they never carried out a target assessment."²⁶⁸⁸ Rather, they "would shoot once and not follow up."²⁶⁸⁹ [REDACTED]

F.THOMAS:T.6798-6799,6829,6831-6832; P.TUCKER:P4203,paras.21-23; R.MOLE:P1426, paras.65,74-76,82; R.SMITH: T.11333-11334; A.VANLYNDEN:P926,paras.23-24,53,57; J.BOWEN:P2068,para.33; H.KONINGS:P1953,para.32; T.KNUSTAD:P152,p.3; T.KNUSTAD:P123,p.14; [REDACTED]; AF138; AF140; P1573; P1575; P1429,pp.4-6,8; P4218.

²⁶⁷⁶ See Brief,fn.2268.

²⁶⁷⁷ J.BOWEN:T.10108,10110-10114; P2074; P2076; M.BELL:P1996 para.72; P2031; A.VANLYNDEN:P926,paras.44-49,87; P928; D.HARLAND:P820,p.ara.29; P2010; P2012; P2031; P2075P2076; D655; D656; S.ŠABANIĆ:P491,p.10; AF129.

²⁶⁷⁸ M.BELL:P1996,paras.32,51,54; D.HARLAND:T.2026; [REDACTED]

R.MOLE:P1492,para.74.

²⁶⁷⁹ H.ABDEL-RAZEK:P1258,pp.2-4,13.

²⁶⁸⁰ H.ABDEL-RAZEK:P1258,p.15.

²⁶⁸¹ R.MOLE:P1426,para.4

²⁶⁸² R.MOLE:P1426,para.90.

²⁶⁸³ [REDACTED]

²⁶⁸⁴ [REDACTED]

²⁶⁸⁵ J.HAMILL:P1994,p.3.

²⁶⁸⁶ J.HAMILL:P1994,p.106.

²⁶⁸⁷ F.THOMAS:P1558,para.13.

²⁶⁸⁸ F.THOMAS:P1558,para.72.

²⁶⁸⁹ F.THOMAS:P1558,para.72.

[REDACTED]

732. VANBAAL, the Chief of Staff for BH Commander ROSE from February to August 1994,²⁶⁹² found that "[s]niping women and children was a strategy, to show the Bosnian people who was in control, and that they could not be protected by the world or the UN."²⁶⁹³ ROSE, UNPROFOR BH Commander throughout 1994,²⁶⁹⁴ said that the presence of snipers made normal life impossible in Sarajevo.²⁶⁹⁵ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

FRASER, who was in Sarajevo from April 1994 to May 1995,²⁶⁹⁸ testified to a "pattern" of sniping across the city.²⁶⁹⁹ He also explained that UNPROFOR or the UNMOs would investigate shelling incidents in the city centre, and that "for the most part, there were only civilian communities or people in those areas, no military target that we could identify."²⁷⁰⁰ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] UNMO KONINGS, in Sarajevo between April and October 1995,²⁷⁰³ saw "random fire" with civilian people "always" being hit²⁷⁰⁴ and "no military pattern" to the attacks.²⁷⁰⁵ He added that incident G19 fit

²⁶⁹⁰ [REDACTED]

²⁶⁹¹ [REDACTED] See also D.HARLAND:T.2038-2039.

²⁶⁹² VANBAAL:P1818,para.5.

²⁶⁹³ VANBAAL:P1818,para.50.

²⁶⁹⁴ M.ROSE:P1638,para.5.

²⁶⁹⁵ M.ROSE:T.7267.

²⁶⁹⁶ [REDACTED]

²⁶⁹⁷ [REDACTED]

²⁶⁹⁸ D.FRASER:P1762,pp.4-5.

²⁶⁹⁹ D.FRASER:T.8022-8023.

²⁷⁰⁰ D.FRASER:P1762,p.51.

²⁷⁰¹ [REDACTED]

²⁷⁰² [REDACTED]

²⁷⁰³ H.KONINGS:P1953,para.9.

²⁷⁰⁴ H.KONINGS:P1953,para.32. See also para.20 on at least 100, maybe up to 150 shelling and sniping investigations.

²⁷⁰⁵ H.KONINGS:P1953,paras.35,38.

into a pattern he had noticed for months: "just firing single rounds into the city knowing that you were hitting always something."²⁷⁰⁶

733. Local witnesses spoke of shelling and sniping being a constant feature of the siege²⁷⁰⁷ and a constant threat.²⁷⁰⁸ Residential neighborhoods were shelled constantly.²⁷⁰⁹ One resident recalled that Hrasnica was shelled so often that they became surprised when it was quiet.²⁷¹⁰ Similarly, the population grew so accustomed to being targeted by shells people learned to recognise their incoming sound.²⁷¹¹

734. Witnesses at all stages of the conflict made the same observation: No matter when, no matter where you lived, as soon as you stepped outside you could be killed at any moment.²⁷¹²

735. The character of the attacks against civilians in Sarajevo changed as the war went on. By 1994, SRK forces began to attack with different weapons, such as wire-guided and anti-tank missiles.²⁷¹³

736. **KARADŽIĆ** and **MLADIĆ** continued to modulate the campaign as circumstances appeared to them to warrant. Thus, undesired military actions by the ABiH engendered fierce retaliation directed at the vulnerable civilian population:²⁷¹⁴

- In response to an ABiH military offensive on 21 March 1993 aimed at cutting the Pale-Lukavica supply line, Serb forces shelled Sarajevo's Old Town area with over 400 shells in five hours an attack UNPROFOR characterised as the deliberate targeting of civilians,²⁷¹⁵ to harass the city's population.²⁷¹⁶
- Retaliating to ABiH mortar fire in late October 1993, Serb forces bombarded the densely populated Old Town of Sarajevo with almost 500 shells in one hour.²⁷¹⁷

²⁷⁰⁶ H.KONINGS:P1953,para.96.

²⁷⁰⁷ H.PALO:P119,p.2; S.CRNČALO:P733,para.86; F.ZAIMOVIĆ:P814,para.39.

²⁷⁰⁸ KDZ079:P480,p.6,para.17(confidential)..

²⁷⁰⁹ P1991; KDZ162:P498,p.11; P1580; P1583; P1584; P1585; P1586; D631; P1574; P1575; P1576; P1578; P1561; P1579; P1581; D3524; D3522; P1587.

²⁷¹⁰ KDZ110:P488,p.7.

²⁷¹¹ ██████████

²⁷¹² A.BANBURY:P2451,para.199; T.ŽUNIĆ:P496,p.5; S.LIVNJAK:P495,p.10;

S.ŠABANIĆ:P492,p.10; D.FRASER:T.8030-8031.

²⁷¹³ M.BELL:P1996,para.55; P1679; D.HARLAND:P820 paras. 151-152.

²⁷¹⁴ P1429,p.8; R.MOLE:P1426,paras.125,126.

██████████; P1065; P1050.

²⁷¹⁶ P1050.

²⁷¹⁷ P823,p.7; D.HARLAND:T.2025; D.HARLAND:P820,para.71.

- During an ABiH attack on Serb-held Grbavica in early January 1994, Serb forces responded with hundreds of shells on residential areas in Sarajevo as observed by UNMOs and UNPROFOR,²⁷¹⁸ and Serb forces issued "an ultimatum on the local radio stating that unless Bosnian forces ceased the attack then a massive retaliation would take place in the form of an artillery attack," putting "the whole town of Sarajevo" on alert.²⁷¹⁹

737. At other times, bombardments were prompted by little more than the apparent interest in reminding Sarajevans that they were never safe. Thus, Serb forces also indiscriminately shelled Sarajevo in huge indiscriminate barrages at midnight on 24 December 1992 and 7 January 1993.²⁷²⁰ There was also random shelling and shelling of residential areas in December 1993.²⁷²¹

738. By February 1994, SRK shelling of the city was so common that an SRK artillery officer interviewed as part of the investigation of G8 (Markale 1) said "that in the previous year, they had fired 30 to 40.000 rounds into the city and why were [the UN] so concerned about one round when they had fired so many."²⁷²²

739. By early August 1994, tram service had been suspended following a spate of sniping incidents.²⁷²³ There was a brief respite for the population when the Anti-Sniping Agreement²⁷²⁴ was signed on 14 August 1994. BANBURY described the Agreement's effect as a kind of "collective exhale," saying that while sniping was not eliminated 100 per cent, it was very close, and "people would congregate in places they had not previously congregated before."²⁷²⁵ The Agreement also led to the establishment by the UN of a specialised anti-sniping task force to engage snipers firing on civilians from SRK held territory.²⁷²⁶

740. This period was short-lived, as the safety, security and humanitarian situation for civilians in Sarajevo progressively deteriorated through autumn 1994. An

²⁷¹⁸ P1586/D3524(duplicates); D3522,p.1; P1587; D178; D3542.

²⁷¹⁹ D3522,p.2.

²⁷²⁰ P.TUCKER:P4203,paras.109-114.

²⁷²¹ P1578; P1573.

²⁷²² J.HAMILL:P1994,p.52.

²⁷²³ D714,p.5; M.ROSE:P1638,para.136.

²⁷²⁴ P861,p.4. *See also* P863; AF2789.

²⁷²⁵ A.BANBURY:P2451,para.50.

²⁷²⁶ D.FRASER:T.8016-8017; P1773,p.2; [REDACTED] P2407,pp.10-11; D.FRASER:P1762,pp.32-34;

[REDACTED]; [REDACTED] P5906,para.64;

[REDACTED]; T.ŽUNIĆ:P496,pp.4,13; P2028; P1075.

UNPROFOR report from early December 1994 recorded one of the attempts to re-start the tram service; Serbs opened fire on civilians waiting at a stop near the Holiday Inn, injuring a 16-year-old girl who lost a leg and a 70-year-old man.²⁷²⁷

(c) Final Stages of the Campaign

741. There was a noticeable upswing in the terror campaign against the civilian population in spring and summer 1995, when the intensity of sniping and shelling increased explicitly in retaliation for ABiH offensives. This period also witnessed the introduction of the highly inaccurate and destructive MABs.

742. With the breakdown of the COHA²⁷²⁸ and the widespread resumption of hostilities, it was evident by March 1995 that the BSL had ratcheted up their strategy. Serb forces retaliated against ABiH military successes outside the Sarajevo theatre by increasing pressure on Sarajevo's civilian population through sniping and shelling.²⁷²⁹ **KARADŽIĆ** and **MLADIĆ** made clear in a meeting with **AKASHI** that month that their intention was to pursue their objectives through military means if they couldn't achieve them at the negotiating table.²⁷³⁰

743. The rise in sniping incidents stopped the tram service. SRK snipers fired on members of the anti-sniping task force performing their duties, and UNPROFOR soldiers erecting anti-sniping screens and barriers.²⁷³¹ On 7 March, an anti-sniping team was hit with five rounds from SRK territory, followed by a VRS demand for UN withdrawal from that location.²⁷³² **MLADIĆ** told **SMITH** that the increase in sniping by Serb forces in Sarajevo was in retaliation for Serb casualties suffered in military offensives launched by the BiH government.²⁷³³

744. Directive 7, which ordered the SRK to prevent the "external lifting" of the siege of Sarajevo at any cost,²⁷³⁴ was distributed to the SRK at the end of March.²⁷³⁵

²⁷²⁷ P872,p.5; D.HARLAND:P820,paras.151-152.

²⁷²⁸ P876,p.3.

²⁷²⁹ D1124,para.5(c);KDZ450:P5906,para.70; A.BANBURY:P2451,paras.93-94; A.BANBURY:T.13467-13468; D.HARLAND:P820,para.171; KDZ304:T.10492-10493; M.BELL:P1996,para.99; P2032; P2480,pp.3-4; D1123,para.3.

²⁷³⁰ P2257,para.3; R.SMITH:T.11337-11338. *See also* P2480,pp.2-3; P2482,para.2; P838,p.8.

²⁷³¹ M.BELL:P1996,para.39; P2011; [REDACTED]

²⁷³² P2455,para.9.

²⁷³³ A.BANBURY:P2451,para.94; P2455,para.9; A.BANBURY:T.13467-13468; M.BELL:P1996,para.98; P2017.

²⁷³⁴ P838,p.11.

²⁷³⁵ P2673.

By mid-April, close to 1000 daily firing incidents were reported in the city, and mortar shells landed in populated areas throughout that month, killing and injuring civilians.²⁷³⁶

745. In this context and throughout the next four months, the SRK launched MABs into densely populated areas of Sarajevo, killing and injuring civilians and causing extensive damage.²⁷³⁷ Indeed, three Scheduled Incidents from this period, G10, G13 and G15, involved the launching of MABs in retaliation for ABiH or NATO actions.²⁷³⁸

746. As noted above, **KARADŽIĆ** explained to Generals JANVIER and SMITH on 30 April 1995 that he believed that retaliation for ABiH actions was effective.²⁷³⁹ Meanwhile, shelling in several localities, including the downtown area of Sarajevo, had increased,²⁷⁴⁰ and there was no abating in sniping incidents.²⁷⁴¹ The Sarajevo TEZ was collapsing.²⁷⁴² On 19 May, **KARADŽIĆ**, asserting that cease-fires only help the Muslims, stated that he would not stop the army—"They have to do their job."²⁷⁴³

747. An increase in the use of heavy weapons by both sides²⁷⁴⁴ against combatants did not mean an end to the campaign against civilians. Shelling of civilian areas remained a feature of Sarajevo²⁷⁴⁵ and the use of MABs increased. In two separate incidents,²⁷⁴⁶ G11 and G12 on 24 May 1995, SRK forces fired MABs into Sarajevo, killing three civilians and injuring a number of others.²⁷⁴⁷

748. NATO followed up with air strikes on 25 and 26 May 1995. These resulted in punitive, retaliatory Serb shelling of Sarajevo and other places.²⁷⁴⁸ In particular, within minutes of the second airstrike, the SRK launched another MAB against Sarajevo, destroying the top floor of an apartment building, injuring seventeen,²⁷⁴⁹

²⁷³⁶ D.HARLAND:P820,para.174; P882,p.2; P2486,p.3,para.4.

²⁷³⁷ See SIS Shelling Appendix.

²⁷³⁸ See SIS Shelling Appendix; IV.E.3.(b).(i): Modified Air Bombs.

²⁷³⁹ See Brief,para.621.

²⁷⁴⁰ P886,p.2.

²⁷⁴¹ [REDACTED]; P1911.

²⁷⁴² P4191.

²⁷⁴³ P4817.

²⁷⁴⁴ P2441,p.2.

²⁷⁴⁵ P1919; [REDACTED]; E.SULJEVIĆ:P1276,para.48.

²⁷⁴⁶ [REDACTED]; [REDACTED]

²⁷⁴⁷ See SIS. G11,G12.

²⁷⁴⁸ P6275,para.4; D1058,p.4,para.11; P6573; P6274,p.2.

²⁷⁴⁹ See SIS. G13; P1913; P1325.

and began taking UN personnel hostage.²⁷⁵⁰ Serbs also took other punitive measures against the citizens of Sarajevo, such as closing land and air access to the city, and cutting off gas, electricity and water.²⁷⁵¹

749. Shelling of civilians continued during June 1995.²⁷⁵² On 16 June 1995 three MABs impacted in populated areas of ABiH-held Sarajevo.²⁷⁵³ That same day, the UNSC issued Resolution 998, expressing grave concerns over increasing attacks on the civilian population.²⁷⁵⁴

750. Serb forces followed up by shelling water lines in Dobrinja on 18 and 21 June, killing thirteen people and injuring twenty-seven, and shelling the Ciglane outdoor market on 21 June, injuring five.²⁷⁵⁵ Six days after G14 and G15, another person was killed and five injured when an improvised rocket landed near the TV building in Alipašino Polje. Most of the victims were elderly; others were very young.²⁷⁵⁶ Similar incidents occurred in Novi Grad on 18 and 21 June.²⁷⁵⁷

751. On 29 June 1995, SRK forces fired two MABs at the Alipašino Polje area, one hitting an apartment building, killing four people and destroying three floors.²⁷⁵⁸ On 1 July, the central parts of Stari Grad and Centar were extensively shelled, killing and injuring numerous civilians.²⁷⁵⁹ Around this time, numerous other residential areas in Sarajevo were indiscriminately shelled, causing civilian casualties.²⁷⁶⁰ Meanwhile, sniping spread to a number of areas usually considered reasonably safe.²⁷⁶¹

752. An ABiH offensive during this period achieved very little, and engendered further retaliation.²⁷⁶² In the last week of June 1995, Bosnian Serb officials told UN Civil Affairs that they intended to launch punitive counter-attacks against the urban

²⁷⁵⁰ D1058; P6097; P2172. *See* VI.C: Hostage taking implementation.

²⁷⁵¹ P6276,p.7; D.HARLAND:P820,paras.197-204; P896,p.6; P6274,p.3; P6275,para.6; D1058,para.14; P2006.

²⁷⁵² P1326; E.SULJEVIĆ:P1276,para.54; P890,p.2.

²⁷⁵³ [REDACTED]; P1806; P1328; P1746 D.MILOŠEVIĆ:T.32779-32780; B.VIDOVIĆ:P1742,pp.36-40; E.SULJEVIĆ:P1276,paras.59-60.

²⁷⁵⁴ P5014.

²⁷⁵⁵ P892,p.3.

²⁷⁵⁶ P892,p.3; D.HARLAND:P820,paras.195-198; E.SULJEVIĆ:P1276,para.63; P1861; P1332. *See also* P1860.

²⁷⁵⁷ P1330; E.SULJEVIĆ:P1276,paras.61-62; P1331.

²⁷⁵⁸ P896,p.2; E.SULJEVIĆ:P1276,paras.64-68.

²⁷⁵⁹ P1990. *See also* P1862

²⁷⁶⁰ P896,p.2; E.SULJEVIĆ:P1276,paras.64-68; P1333; P1921; P1334; P1335; P1336

²⁷⁶¹ P896,p.3.

²⁷⁶² D.HARLAND :P820,para.203 ; D2901,pp.2-3.

area of Sarajevo in response to the offensive.²⁷⁶³ They followed up this announcement with indiscriminate bombarding of downtown Sarajevo, increased sniper activity, and the launching of MABs at the Alipašino Polje area. One struck the TV building, and four people were killed when a similar weapon hit a nearby apartment building.²⁷⁶⁴

753. An UNPROFOR report of July 1995 bluntly depicted the situation:

Sniping and mortaring are still at a reasonably high level. This seems to have no particular military value but contributes to a general atmosphere of terror in the city. Almost no civilians now use the city's main east-west thoroughfare ('Sniper Alley') -- so much so that snipers who used to work that area now seem to have relocated.²⁷⁶⁵

754. As July progressed Bosnian Serb Fforces continued their "sporadic" bombardment of the downtown area, "apparently in an effort to terrorise the population, rather than to attain any particular military objective."²⁷⁶⁶ On 18 July 1995, a volley of four mortar rounds hit Velešići, killing five civilians (including women and elderly) and wounding others.²⁷⁶⁷ In a warning to his troops the next day about the need to conserve ammunition, MILOŠEVIĆ explicitly acknowledged that his subordinates were targeting "inhabited settlements" when there are no combat actions whatsoever.²⁷⁶⁸ Despite a lull in military activity around the city, firing of mortars into the downtown area continued in late July 1995.²⁷⁶⁹ The day after an UNPROFOR sitrep reported on 27 August 1995 that the civilian population had begun to emerge from its respective shelters and to congregate outside again,²⁷⁷⁰ a 120mm mortar shell exploded outside the Markale marketplace, killing and injuring dozens of civilians in G19.²⁷⁷¹

²⁷⁶³ P896,p.2.

²⁷⁶⁴ D.HARLAND:P820,paras.213-214; P896. *See also* AF2903.

²⁷⁶⁵ D.HARLAND:P820,para.217; P822,p.2.

²⁷⁶⁶ D.HARLAND:P820,para.217; P897,p.4.

²⁷⁶⁷ P1340; P1338; E.SULJEVIĆ,P1276,para.72.

²⁷⁶⁸ P2668.

²⁷⁶⁹ P2282,p.3.

²⁷⁷⁰ D2323,p.6.

²⁷⁷¹ *See* SIS.G19.

3. Sniping and shelling targeted the civilian population of Sarajevo

755. Civilians in Sarajevo were killed and injured by sniping or shellfire from Serb-held territory when doing the simplest things: looking or waiting for water;²⁷⁷² shopping in marketplaces;²⁷⁷³ or queuing for food²⁷⁷⁴ or humanitarian aid.²⁷⁷⁵ The SRK shot at trams²⁷⁷⁶ and buses²⁷⁷⁷ packed with civilians. Victims of sniping and shelling included obvious civilians such as children.²⁷⁷⁸

756. Even funerals were targeted by sniping and shelling²⁷⁷⁹ and were often held at night because of the risk.²⁷⁸⁰ Because exposed areas of the city were dangerous due to shelling and sniping,²⁷⁸¹ civilians in Bosnian-held Sarajevo altered their behaviour.²⁷⁸² They developed alternative, less exposed routes to move about,²⁷⁸³ which were in any event shelled.²⁷⁸⁴

757. The risk of death and injury was so great that Sarajevo residents deferred basic survival tasks to times of reduced visibility.²⁷⁸⁵ They limited their time outdoors,²⁷⁸⁶ confining themselves to their homes and cellars for long periods, yet even there they

²⁷⁷² H.ABDEL-RAZEK:P1258,p.16; F.ZAIMOVIĆ:P814,para.44; M.BELL:P1996,paras.50,83; P1999; H.KONINGS:P1953,pp.11-12,32(Konings statement); D.HARLAND:P820,paras.197-198;213-214; S.CRNČALO:P733,para.91; KDZ090:P2923,p.5; P896,p.3; P2004; J.BOWEN:P2068,para.19; T.KNUSTAD:P152,p.3; T.KNUSTAD:P123,p.14; AF114; A.GIČEVIĆ:T.7624-7625.

²⁷⁷³ D.HARLAND:P820,para.197; S.CRNČALO:P733,paras.94-95; AF55.

²⁷⁷⁴ B.STANKOV:P670;S.CRNČALO:P733,para.91.

²⁷⁷⁵ KDZ090:P2923,p.5(public redacted version of [REDACTED]); AF62.

²⁷⁷⁶ See SIS.F8,F11,F14,F15,F16; [REDACTED] P2923,p.11; M.BELL:P1996,para.48; AF112; H.PALO:P120,pp.14,1517; KDZ289:[REDACTED]; KDZ204:P492,p.10; P2528,p.5; AF2910; P928.

²⁷⁷⁷ See SIS F7; M.KUČANIN:P23,p.5; AF2912; AF111; AF112.

²⁷⁷⁸ P896; D.HARLAND:P820,para.214; D.HARLAND,T.2028; F.ZAIMOVIĆ:P814,para.10; S.CRNČALO:P733,para.92; P1340; BOWEN,T.10211-10213; J.BOWEN:P2068,paras. 24,32,37,38; M.BELL:P1996,para.95; P1822; M.KUČANIN [REDACTED]; M.KUČANIN:P23,pp.5,9; AF115.

²⁷⁷⁹ J.BOWEN:P2068,para.37; P1933; P2078; J.BOWEN:T.10118-10122; E.TURKUŠIĆ:T.9157-9158; S.CRNČALO:P733,para.96; H.ABDEL-RAZEL:P1258,p.16; KDZ090:P16,pp.120-121; P1501; M.KUČANIN:[REDACTED]; P20; M.KUČANIN:P23,p.9; AF111; AF55.

²⁷⁸⁰ A.BEGIĆ:T.9967; S.CRNČALO:P733,para.96.

²⁷⁸¹ [REDACTED]:T.11008; A.BANBURY:P2451,para.199; M.BELL:P1996,para.35.

²⁷⁸² AF25; AF56-AF61; AF63-64, AF70-71, AF127; [REDACTED]:P2923,p.4; D.HARLAND:P820,paras.28-29; M.ROSE:T.7267; J.BOWEN:P2068,para.14; Y.HAJIR:P1866,para.55.

²⁷⁸³ F.THOMAS:T.6805; M.ROSE:T.7269-7270; D.FRASER:P1762,p.24; D.HARLAND,T.2027; A.GIČEVIĆ:P1690,para.2,pp.3-4; M.BELL:P1996,para.38; P2031; P2010:V000-7546; M.KUČANIN:P21,p.2; [REDACTED].

²⁷⁸⁴ See F.THOMAS:P1558,para.29.

²⁷⁸⁵ M.ROSE:T.7266-7267. See also [REDACTED].

²⁷⁸⁶ J.BOWEN,T.10117; D.HARLAND:P820,paras.25-26,29,198; D2884, p.2; A.VANLYNDEN:P926,para.21; J.BOWEN:P2068,para.25; I.MIŠČEVIĆ:T.32091-32092; T.ŽUNIĆ:P496,p.5; [REDACTED]

were not safe.²⁷⁸⁷ Defence witness MIŠČEVIĆ explained that the Hrasnica skyscraper where he lived was hit by Serb shells over a hundred times; his own apartment was attacked six or seven times, and he was inside it when, on three or four occasions, it was hit by tank fire.²⁷⁸⁸

758. Throughout the campaign, the main Sarajevo hospitals received hundreds of wounded and killed patients; there was insufficient space to accommodate the injured.²⁷⁸⁹ Serb forces repeatedly targeted ambulances²⁷⁹⁰ and hospitals, killing and injuring staff and patients.²⁷⁹¹

759. MANDILOVIĆ described "intense" shelling of the State hospital building and the surrounding Marin Dvor area, often for 10 to 12 hours at a time, and recalled that patients were moved to the lower floors and the basement to avoid shelling.²⁷⁹²

760. The whole city, including landmark buildings and residential apartment blocks, was damaged by shelling or gunfire.²⁷⁹³

761. Bodies of sniping victims lay in the open until they could be safely retrieved,²⁷⁹⁴ and rescuers trying to reach people hit by sniper fire were targeted as they assisted.²⁷⁹⁵

762. The endless Serb attacks sent one message to Sarajevo's civilians: no one was safe.

See [REDACTED]; S.DŽEVLAN:P2291,pp.6,8.
²⁷⁸⁷ A.VANLYNDEN:P926,paras.21,24; P2077; J.BOWEN.10116-10117,10212-10213; M.KUČANIN:P21,pp.2-3; F.TARČIN:P498,pp.4-5,11; P2074; M.KUČANIN:[REDACTED]; [REDACTED]; [REDACTED]P2413,p.14; F.ZAIMOVIĆ:T.1889; F.ZAIMOVIĆ:P814,paras.45-46; [REDACTED]; S.DŽEVLAN:P2291,pp.6,8.

²⁷⁸⁸ I.MIŠČEVIĆ:T.32087-32089.

²⁷⁸⁹ J.BOWEN:P2068,para.25.

²⁷⁹⁰ A.GIČEVIĆ:T.7624; Y.HAJIR:T.8788,8867; Y.HAJIR:P1866,para.47; AF54; AF55; P2031.

²⁷⁹¹ M.MANDILOVIĆ:P1217,paras.35,37,42-58,52,93,97-98; M.MANDILOVIĆ:T.5350; H.ABDEL-RAZEK:P1258,p.16; B.NAKAŠ:P1525,paras.19-26,28-33; B.NAKAŠ:T.6688-6690,6720-6722,6748-6749; P1526; F.ZAIMOVIĆ:P814,paras.11-14; F.ZAIMOVIĆ:T.1888; P1572,p.1; P1022; P6336; P.TUCKER:T.23301; P.TUCKER:P4203,para.98; P2034; M.BELL:P1996,para.82; P1221; P1222; J.BOWEN:P2068,para.25; AF3016-AF3019.

²⁷⁹² M.MANDILOVIĆ:P1217,paras.53-56; M.MANDILOVIĆ:T.5405; AF2883; AF2884.

²⁷⁹³ R.MOLE:P1426,paras.71-75; D.HARLAND:P820,para.27; M.BELL:P1996,para.41; P2015; J.WILSON:P1029,paras.48-49. See, e.g., P04212; P01065.

²⁷⁹⁴ P2018].

²⁷⁹⁵ T.ŽUNIĆ:P496,pp.4,13.

(a) Sniping targeted civilians

763. By its very nature, sniping victims were deliberate individual targets. As noted above, it was obvious both to the residents themselves and to international observers that Serb snipers deliberately targeted the civilian population of Sarajevo.²⁷⁹⁶ Civilians were killed or wounded in large numbers. Victims regularly included women, children and the elderly.²⁷⁹⁷

764. Sniping of civilians became so routine that "[e]xposed intersections often had hand-painted signs that said 'Beware of Snipers,'" and there would be "clumps of people standing waiting to cross these intersections, and then dashing to the other side when they felt there was a lull in the shooting."²⁷⁹⁸ Contemporaneous videos show civilians around the city running across open areas, sprinting through intersections or driving their cars erratically to avoid the fire around them.²⁷⁹⁹ One such video graphically depicts civilians attempting to cope: a group huddles behind a slow-moving French armoured vehicle sheltering them from sniper fire as they shuffle across a street near the Holiday Inn.²⁸⁰⁰

(b) Shelling targeted civilians

765. Serb shelling also targeted the civilian population of Sarajevo. Entire areas of the city were targeted, including places where people gathered; and no part of the city was spared. Artillery units directly attacked civilians by firing on residential areas with no military objects in the vicinity, undertaking massive indiscriminate bombardments of the city, firing shells randomly and sporadically into various parts of the city, and using MABs. Claims such as targeting mobile mortars, as discussed below, were either pretexts or false post-hoc justifications, or disproportionate attacks.

766. Serb artillery targeted residential areas, as confirmed by local²⁸⁰¹ and international witnesses,²⁸⁰² and contemporaneous UNMO reports.²⁸⁰³ SRK officers

²⁷⁹⁶ See IV.E.3: Sniping and shelling targeted the civilian population of Sarajevo.

²⁷⁹⁷ E.TABEAU:P4997,pp.4-7; E.TABEAU:P4998,pp.2-6; E.TABEAU:P5002,pp.3-7; A.BANBURY:T.13317; A.BANBURY:P2451,para.32.

²⁷⁹⁸ D.HARLAND:P820,para.29. See also A.VANLYNDEN:P926,para.48; KDZ289: [REDACTED].

²⁷⁹⁹ P928; P2010; P2012; P2031; P2075 ; P2076; D655; D656; S.ŠABANIĆ:P491,p.10.

²⁸⁰⁰ M.BELL:P1996,para.53; P2000.

²⁸⁰¹ N.ĐOZO:P1978,paras.19-20; B.VIDOVIĆ:P1742,p.39; F.ZAIMOVIĆ:P814,paras.25,27; GIČEVIĆ:P1690,p.9; E.TURKUŠIĆ:P1925,p.9; [REDACTED]:P2164,paras.58,60; M.KUČANIN:P27,p.4; M.SABLJICA:P1735,p.3; M.KUČANIN:P23,p.4; P1334; F.TARČIN:P498,pp.4-5,paras.2-9,p.11; M.KUČANIN:P:27,pp.3-4; M.KUČANIN:P23,pp.3,17-19; M.KUČANIN:P23,p.5.

also acknowledged firing on residential areas.²⁸⁰⁴ They aimed at apartment buildings, such as the attack on a high rise apartment block housing several hundred people on 5 December 1992, whose deliberate nature was revealed by an attack in two waves. The first wave attracted rescue workers by setting various floors of the building on fire with incendiary bullets. After fire-fighters arrived and made their way to the upper floors, more incendiary rounds struck and set alight the lower floors of the building, cutting off escape routes and forcing the firemen and the remaining occupants to climb from balcony to balcony to save themselves.²⁸⁰⁵

767. UNMO OPs were targeted with shells,²⁸⁰⁶ UNPROFOR battalion headquarters, OPs and checkpoints were shelled.²⁸⁰⁷ The home of UNPROFOR, the PTT building, far from the frontline, was repeatedly shelled.²⁸⁰⁸

768. The SRK shelled everywhere in Sarajevo, blanketing areas indiscriminately with shells: "These were not military targets."²⁸⁰⁹ In many cases it was clear that there was no specific target because "[t]here was no concentration of fire [...] just the general area was being fired upon."²⁸¹⁰

769. In addition to bombardments and blanketing whole areas, the shelling of Sarajevo featured "single shells landing arbitrarily around the city, to no military purpose,"²⁸¹¹ and with "no apparent target analysis of what they'd hit."²⁸¹² Instead, the SRK "would shoot once and not follow up."²⁸¹³ Shells were simply fired randomly "with single rounds or a few rounds on areas where there were no military targets

²⁸⁰² P1559,para.7; F.THOMAS:P1558,para.95,sub-para.19,p.26; P895.

²⁸⁰³ P1561; P1580; P1583; P1584; P1585; P1586; D631; P1574; P1575; P1576; P1578; P1579; P1581; D3524; D3522; P1587.

²⁸⁰⁴ N.MIJATOVIĆ:T.30727; M.ŠKRBA:T.29125,29201; P5940; S.GALIĆ:T.37359,37933-37934,37937; P2668,p.1; P1501.

²⁸⁰⁵ A.VANLYNDEN:P926,paras.122-126; P936,p.1; AF2888.

²⁸⁰⁶ D520; R.MOLE:P1426,pp.6-7; P1061; P6298; P6299; GALIĆ:T.37814-37822,37825;

²⁸⁰⁷ P2026; P4226; P1061; KDZ185:P6060,p.18; P2662; P6575,p.2; P892,p.1;

M.BELL:P1996,paras.39-40.

²⁸⁰⁸ R.MOLE:P1426,paras.66-70; [REDACTED] P2107;

D.HARLAND:T.2303-2305; P837; P1787; P895; H.ABDEL-RAZEK:T.5568;

P.BRENNKAG:P1851,paras.53-57.

²⁸⁰⁹ H.ABDEL-RAZEK:P1258,p.15.

²⁸¹⁰ J.WILSON:T.4132. *See also* J.WILSON:P1029,paras.51-53,56-57.

²⁸¹¹ P.TUCKER:P4203,para.23. *See also* [REDACTED] T.4182-4183.

²⁸¹² F.THOMAS:T.6799.

²⁸¹³ F.THOMAS:P1558,para.72.

whatsoever [...],"²⁸¹⁴ a practice observed by witness after witness.²⁸¹⁵ United Nations military personnel confirmed that "[y]ou have to adjust the fire [...] -- normally, it can take three or five or more rounds to adjust on to a target which you want to hit subsequently."²⁸¹⁶ Defence witnesses agreed that if a first shell fails to hit a military target, "then one would have to adjust the fire and fire again until the target is hit."²⁸¹⁷ Defence witness SIMIĆ said he "would consider this to be illegal" to order firing on a part of Sarajevo without specifying a particular target: "Firing upon a city without a specific target, that would be inflicting terror on the civilians, on the population of the city of Sarajevo."²⁸¹⁸ [REDACTED]

[REDACTED] Numerous examples of this practice are shown in detail in the Scheduled Incident Summaries for Schedule G.

770. Contemporaneous UNMO reports also recognized the random and therefore harassing nature of Serb shelling of civilian areas.²⁸²⁰ For example, on 14 December 1993, UNMOs observed 329 impacts in ABiH-controlled territory that appeared to be "directed at civilian and random targets."²⁸²¹

771. The SRK had the demonstrated capability to fire its artillery accurately, to observe military targets and civilians throughout the city, and to shell military objects when it chose to do so.²⁸²² Yet it engaged in massive indiscriminate bombardments of Sarajevo, and in random shelling, which by its very nature did not distinguish

²⁸¹⁴ H.KONINGS:T.9346. *See also* H.KONINGS:P1953,paras.35,38,96.

²⁸¹⁵ A.VANLYNDEN:P926,paras.23-24,53,57; D.HARLAND:P820,paras.33,290; [REDACTED] T.4182-4183; F.THOMAS:T.6798-6799,6829,6831-6832; P.TUCKER:P4203,paras.21-23; R.MOLE:P1426,paras.65,74-76,82; R.MOLE:T.5818-5819; R.SMITH:T.11333-11334; J.BOWEN:P2068,para.33; H.KONINGS:P1953,para.32; T.KNUSTAD:P152,p.3; T.KNUSTAD:P123,pp.13-14; [REDACTED]; KDZ185:P6060,p.16,para.8; R.THOMAS:P1558,para.72; P1575; R.THOMAS:T.6798-6799; R.HIGGS:P1437,p.4; P.TUCKER:P4203,para.22.

²⁸¹⁶ J.HAMILL:T.9730-9731. *See also* F.THOMAS:T.6798-6799.

²⁸¹⁷ I.GOLIĆ:T.31550. *See also* D.ŠKRBA:T.29117-29118.

²⁸¹⁸ S.SIMIĆ:T.30053.

²⁸¹⁹ [REDACTED].

²⁸²⁰ P1569,p.1; P1572,p.1; P1574,p.1; P1576,p.1; P1578,p.1; P1580,p.1; P1581,p.1; D3522; P1586; P1587; P1573; P1575; R.MOLE:P1426,paras.74-76; P1433,pp.2,4; P1434,p.15; P1429,pp.4-6,10. *See also* P1034. For evidence regarding UNMO reporting, including term "UNMO confirmed," *see* R.MOLE:P1426,paras.24-29; R.MOLE:T.5807-5811; F.THOMAS:P1558,paras.32-34; F.THOMAS:T.6801-6802,6925. For explanation of discrepancy in Lima- and Papa-side reporting, *see* R.MOLE:P1426,paras.16-23; R.MOLE:T.5815-5817,5851.

²⁸²¹ P1576.

²⁸²² *See* IV.E.2.(a)(i): Scheduled incidents G1 and G2. *See also* A.VANLYNDEN:P926,para.55; P930; A.VANLYNDEN:T.2495,2611; R.DONIA:P973,pp.88-89; S.GUZINA:T.31184-31185; P6039; D.FRASER:P1762,p.52; P.TUCKER:P4203,p.55,paras.229-230; H.ABDEL-RAZEK:P1258,pp.20,23; [REDACTED] KDZ304:P2407,p.23; F.THOMAS:P1558,p.23; P.BRENNKAG:P1851,para.53.

between civilian and military targets. Given the frequency of such indiscriminate attacks, as well as the fact that large numbers of military targets were left untouched,²⁸²³ it is clear that the aim was to ensure that civilians and civilian objects would in fact be shelled.²⁸²⁴ In this regard MILOŠEVIĆ's admission that the SRK did not even attempt to fire on any of the alleged 275 ABiH "command posts" he claimed existed in Sarajevo speaks for itself.²⁸²⁵

(i) Modified Air Bombs (MABs)

772. The SRK also launched highly inaccurate yet extremely destructive MABs into Sarajevo, despite their clear unsuitability for use in an urban environment.²⁸²⁶ The repeated use of such an indiscriminate and destructive weapon within Sarajevo itself demonstrates that their purpose was simply to target—and terrorize—the civilian population.

773. In particular, JCE members viewed the MABs as an instrument for retaliation, to be used on the civilian population in response to ABiH or NATO actions:

- At the conclusion of G10 (7 April 1995), following a period of military activity on the confrontation line through Ilidža, away from the centre of Hrasnica,²⁸²⁷ MILOVANOVIĆ reported to KARADŽIĆ that "enemy activity was adequately responded to whereby an air-bomb (250 kg) was launched on the centre of Hrasnica."²⁸²⁸
- In response to information indicating "the enemy is preparing for actions," MILOŠEVIĆ ordered on 19 April 1995 all units to have "launching pads and aerial bombs ready for *firing on the town*."²⁸²⁹
- After a second round of NATO airstrikes on 26 May 1995,²⁸³⁰ SRK forces responded by targeting civilians and UN personnel.²⁸³¹ This included the

²⁸²³ D.HARLAND:T.2303-2305,2351; [REDACTED]; KDZ185:P6060,p.4; D.FRASER:P1762,p.51; D.FRASER:T.8006-8007; [REDACTED].

²⁸²⁴ See *Galić* AJ, paras.132-133.

²⁸²⁵ D.MILOŠEVIĆ:T.33128.

²⁸²⁶ See IV.E.1.(a).(ii).b.iii: SRK Artillery used inaccurate Modified Air Bombs (MABs).

²⁸²⁷ P5943,p.4; P1201; T.OVERGARD:T10021-10022,10025.

²⁸²⁸ P5943,p.5. See SIS.G10.

²⁸²⁹ AF 2870(emphasis added).

²⁸³⁰ D1058.

shelling of Sarajevo,²⁸³² and, in particular, the launching of a MAB that landed in an apartment on Safeta Hadžića street (G13).²⁸³³

- ABiH military operations took place on 15 June at locations far outside urban, encircled Sarajevo,²⁸³⁴ and the following day along confrontation line locations on the "inner ring" of the city.²⁸³⁵ The Serb response on the afternoon of 16 June was to launch a MAB that struck the residential area of Alipašino Polje, where conflict was not occurring (G15).²⁸³⁶
- In a 17 June 1995 conversation between KRAJIŠNIK and PRETIS director MOTIKA about Visoko, "where there was a big attack," KRAJIŠNIK said "some retaliation should be done," sought assurances that MABs were being prepared, and agreed that retaliation should be done both "down there" in Višoko as well as "[h]ere in the town" in Sarajevo.²⁸³⁷ Five days later, an MAB exploded near the TV building in Alipašino Polje causing six civilian casualties,²⁸³⁸ followed by more shelling attacks in Sarajevo in the following week causing additional civilian deaths and injuries.²⁸³⁹

774. UNPROFOR described MABs as "highly inaccurate indiscriminate, highly destructive weapons of terror."²⁸⁴⁰

775. And that was their purpose, as acknowledged by a SRK liaison officer. On 9 July 1995, the liaison officer of the Ilidža Brigade told UNPROFOR that about a dozen modified air-bombs had been fired on the city of Sarajevo. The officer admitted that the use of this weapon was intended as "psychological warfare aimed at upsetting the ABiH soldiers engaged on the Treskavica front who would be worried about the

²⁸³¹ P6274; P6275; P6097; P2172.

²⁸³² P6274; P6275.

²⁸³³ D532. *See* SIS Shelling Appendix.

²⁸³⁴ D2691; D2692; D2690.

²⁸³⁵ D2416; D2415; D186; D187; AF21-AF22.

²⁸³⁶ *See* SIS Shelling Appendix.

²⁸³⁷ P5653; M.KRAJIŠNIK:T.43911.

²⁸³⁸ P892,p.3; D.HARLAND:P820,paras.195-198; E.SULJEVIĆ:P1276,para.63; P1861; P1862; P1332.

²⁸³⁹ P896,p.2; E.SULJEVIĆ:P1276,paras.64-68; P1333; [REDACTED]; P1334; P1335; P1336.

²⁸⁴⁰ D.HARLAND:P820,para.214; P896.

safety of their families in Sarajevo."²⁸⁴¹ Indeed, he explained that press reports informed Bosnian soldiers about the existence of these "weapons called Terror."²⁸⁴²

776. Specific examples of MABs targeting civilians can be found in the Appendix discussions of G10-G15.²⁸⁴³

4. Restrictions on aid and utilities supported the campaign of terror

777. In support of the sniping and shelling campaign of terror, **KARADŽIĆ** and others restricted humanitarian aid and cut off utilities within Sarajevo. These restrictions were often directed against the civilian population in retaliation for ABiH or NATO actions. As a result, people had to forage for water and wood, most often women.²⁸⁴⁴ Residents often had to go to collection points to get water when fighting was at its fiercest.²⁸⁴⁵ Every time someone went out to fetch something it was done in the knowledge that they were in danger of being shot or shelled.²⁸⁴⁶ Filling these basic needs put them at increased risk of death and injury from the constant shelling and sniping.

778. As previously discussed, **KARADŽIĆ** played an active role in restricting humanitarian aid and utilities to Sarajevo for purposes of retaliation.²⁸⁴⁷

779. Other Serb officials followed his lead, regularly imposing restrictions on utilities and the delivery of humanitarian aid into the city by blocking freedom of movement of the UN and aid agencies²⁸⁴⁸ and closing the airport.²⁸⁴⁹ For example, following the NATO bombardment in May 1995, UNPROFOR noted that Serbs had "cut the water and electricity supplies to Sarajevo" and had closed land access into the city.²⁸⁵⁰ TOLIMIR announced that there would be no restoration of utilities until the fighting was over.²⁸⁵¹ A few months later, Serb authorities openly admitted that they

²⁸⁴¹ P2108,p.3. *See also* M.TRIVIĆ:T.40565-40567.

²⁸⁴² P2108,p.4.

²⁸⁴³ *See* SIS.G10-G15.

²⁸⁴⁴ A.VANLYNDEN:P926,para.24. *See also* J.BOWEN:P2068,para.19; M.BELL:P1996,paras.49-50; P2016; P1999;P.TUCKER:P4203,paras.44,49.

²⁸⁴⁵ M.BELL:P1996,para.49.

²⁸⁴⁶ A.VANLYNDEN:P926,para.24; P1999; D.HARLAND:P820,paras.197-198..

²⁸⁴⁷ *See* IV.C.2: **KARADŽIĆ** modulated the campaign of terror.

²⁸⁴⁸ D1157; A.BANBURY:T.13440-13443.

²⁸⁴⁹ D1136; A.BANBURY:T.13312,13334-13335; P2456.

²⁸⁵⁰ P6275,p.3,para. 6.

²⁸⁵¹ D.HARLAND:P820,para.201; AF3084.

had cut off the water, electricity and gas supplies in Sarajevo in late May 1995 as punishment for an ABiH offensive.²⁸⁵²

780. Apart from facilitating the effects of the shelling and sniping campaign, restricting UNPROFOR's freedom of movement to deliver aid to the civilians of Sarajevo and restricting utilities was another way of punishing and obtaining leverage by targeting the civilian population. The timing of these deliberate restrictions often matched periods of increased sniping and shelling, and was unconnected to military action in the Sarajevo theatre. For example, following rejection of the CG plan in July 1994 and ABiH offensives in areas far away from Sarajevo, on 26 July, **KARADŽIĆ** ordered closure of the Blue Routes for delivery of humanitarian aid into Sarajevo.²⁸⁵³ A contemporaneous increase in sniping brought tram service to a halt following a spate of sniping incidents.²⁸⁵⁴ City residents were again returned to walking long distances, often in range of snipers.²⁸⁵⁵

781. In September 1994, **KARADŽIĆ** told the Assembly that Serbs should send a message to the EU by imposing the "strictest possible" sanctions on the Muslims so that "not a bird can cross over their territory," in an effort to force the EU to call for the lifting of the Yugoslav sanctions on the RS.²⁸⁵⁶ Despite assuring AKASHI that his threats had to do with commercial traffic only and not water, gas or electricity,²⁸⁵⁷ Sarajevo's gas was cut on 15 September.²⁸⁵⁸ Just days after another indiscriminate Serb shelling,²⁸⁵⁹ on 20 September, **KARADŽIĆ**, concerned over the possibility that the UNSC would tighten sanctions on Pale, said: "If the international community treats us like a beast, then we will behave like a beast," specifically mentioning the use of utilities as a means of war. Later that day, he indicated he might "consider" restoring water, gas and electricity to Sarajevo, in return for concessions.²⁸⁶⁰

²⁸⁵² P6276,p.7; D.HARLAND:P820,paras.200-204; P896,p.6; P6274,p.3; P6275,para. 6; D1058,p.5.

²⁸⁵³ D162,pp.167177; D.HARLAND:P820,paras.121-122; P859; P860; D1160,p.3; P1639;

M.ROSE:P1638,paras.127-129.

²⁸⁵⁴ See SIS.F8; D714,p.5; M.ROSE:P1638,para.136.

²⁸⁵⁵ D162,p.177.

²⁸⁵⁶ P1400,pp.42-43; A.BANBURY:P2451,para.56; P1689.

²⁸⁵⁷ D703.

²⁸⁵⁸ P6068,p.1.

²⁸⁵⁹ On 18 September 1994, Serb forces responded to an ABiH attack east of the city. D2688,pp.3-6; D774,p.1. They fired 12x120mm mortar rounds from Poljine on locations in Sarajevo. D774,p.1. These locations were not among the alleged ABiH firing positions cited by the VRS-GŠ. D773.

²⁸⁶⁰ P834,para.3; D.HARLAND:T.2233-2235; M.ROSE:P1638,paras.118,150.

KARADŽIĆ eventually agreed to restore gas to Sarajevo in a reciprocal agreement with IZETBEGOVIĆ.²⁸⁶¹ Gas was restored to Sarajevo on 27 September.²⁸⁶²

782. In a letter to **KARADŽIĆ** and others that same day from MAKSIMOVIĆ, on behalf of the Assembly of the Serbian City of Sarajevo, the Assembly observed that the recent cutting of electricity, water and gas to Sarajevo "for the purpose of raising and lowering tensions in the whole of former Bosnia and Herzegovina" had caused considerable financial damage to houses in Serb-held areas, and indicated that such activities should be carried out with prior consultation.²⁸⁶³

5. The primary purpose of the sniping and shelling campaign was to spread terror

783. The only reasonable conclusion that can be drawn from the protracted campaign of sniping and shelling the civilian population of Sarajevo is that its primary purpose was terror. The campaign served no military purpose. As shown above, there was an epidemic of sniping of civilians and obvious civilian conveyances like trams and buses,²⁸⁶⁴ and civilian areas were deliberately or indiscriminately shelled, often in retaliation for ABiH efforts outside the city or unrelated political events. Attacks on civilians waxed and waned according to the political environment and the desire to threaten and punish.²⁸⁶⁵ The only discernible rationale for these attacks was the use of the threat (and application) of terror to achieve political ends.²⁸⁶⁶ As BELL said: "The barometer of Bosnia's tensions is the situation in the capital itself".²⁸⁶⁷

784. Senior UN military and civilian personnel consistently recognized this activity as a campaign whose primary purpose was terror,²⁸⁶⁸ emphasizing, *inter alia*, that "there was a desire to spread terror among the population" because "these acts of terror were well-thought-out and deliberate actions".²⁸⁶⁹ UN political officials agreed

²⁸⁶¹ P865(confidential),paras.11,14.

²⁸⁶² P6272.

²⁸⁶³ P6300,pp.4-5.

²⁸⁶⁴ See SIS Sniping Appendix; IV.E.3: Sniping and shelling targeted the civilian population of Sarajevo.

²⁸⁶⁵ See IV.C.2: **KARADŽIĆ** modulated the campaign of terror.

²⁸⁶⁶ See Brief,para.753.

²⁸⁶⁷ P2017.

²⁸⁶⁸ [REDACTED]:P6060,pp.13,14,16; [REDACTED]:P5906,para.68; [REDACTED]; D.HARLAND:T.2351; P.TUCKER:P4203,paras.44,49,300.

²⁸⁶⁹ [REDACTED]:T.13093.

it was "clearly a campaign of terror,"²⁸⁷⁰ observing that the military activity "had no identifiable military tactical purpose."²⁸⁷¹ International journalists who were present made the same observations.²⁸⁷² The duration and intensity of the campaign left no doubt that there was, as one UN official described, "a general policy aimed at terrorising the population and targeting the population."²⁸⁷³

785. Moreover, although the actual propagation of terror is not an element of the crime, the extent of the horrors endured by the Sarajevo civilian population over 44 months further demonstrates that the primary purpose of the campaign could only have been terror.²⁸⁷⁴ The evidence is overwhelming that the protracted shelling, sniping, and deprivations had a palpable, visible and notorious effect on the population.²⁸⁷⁵ Those who escaped physical harm experienced the uncertainty, vulnerability, fear and anxiety of being murdered or maimed, or losing friends and family, at any given moment.²⁸⁷⁶ Sulejman CRNČALO arrived in Sarajevo with his family on 2 July 1992, the day they had been expelled from Pale.²⁸⁷⁷ He described how the hardship of daily life was compounded by the anguish caused by the sight of blood on the streets and corpses which could not be collected for burial due to the constant shelling and sniping.²⁸⁷⁸ He lived in constant fear that he or a member of his

²⁸⁷⁰ A.BANBURY:P2451,para.199.

²⁸⁷¹ D.HARLAND:P820,paras.33-34,219; D.HARLAND:T.2351.

²⁸⁷² A.VANBAAL:P1818,p.12,paras.48-49.

See also KDZ182:T.13038-13039; [REDACTED] M.ROSE:T.7267;A.VANBAAL:P1818,paras.48-49;

A.BANBURY:P2451,paras.197,199,202; [REDACTED].

²⁸⁷⁴ D.Milošević AJ,para35.

²⁸⁷⁵ M.BELL:P1996,paras.49-54; M.BELL:T.9776-9778; P2000; P2006; P2027; P2016; P2023;

P.TUCKER:P4203,paras.21-22,44; B.NAKAŠ:P1525,paras.50-54,57-58; B.NAKAŠ,T.6679-6680;

A.VANLYNDEN:P926,paras.24-25,51,127-128; KDZ185:P6060,p.16; R.MOLE:P1426,paras.8-9;

R.MOLE:T.5823; Y.HAJIR:P1866,paras.48-58; Y.HAJIR:T.8859-8861;

M.MANDILOVIĆ:P1217,paras.107-114, M.MANDILOVIĆ:T.5357-5358,5380-5381;

[REDACTED]; A.VANBAAL:T.8461-8462; D.FRASER:P1762,p.73;

[REDACTED] P2923:para.12; [REDACTED]; P482,p.19; P5925,p.4; D.MALETIĆ:D2519,para.26;

J.BOWEN:T.10109; J.BOWEN:P2068,para.43; M.ROSE:T.7266-7267; P1262,para.1;

V.RADOJČIĆ:T.31270.

²⁸⁷⁶ H.PALO:P120,p.14; [REDACTED];

A.VANLYNDEN:P926,paras.21,24,51,126-127; M.ROSE:T.7266-7267; I.MIŠČEVIĆ:T.32089;

N.KECMANOVIĆ:T.39140; H.ABDEL-RAZEK:T.5514-5515; [REDACTED];

A.VANDERWEIJDEN:[REDACTED] p.7; A.VANBAAL:P1818,paras.48-50; A.GIČEVIĆ:T.7614;

B.NAKAŠ:P1525,paras.50-54,57-58; B.NAKAŠ:T.6679-6680; M.MANDILOVIĆ:P1217,paras.107-

108; M.MANDILOVIĆ:T.5358; J.BOWEN:T.10114-10117,10212-10213; J.BOWEN:P2068,paras.

24,27-28; P2077; R.MOLE:P1426,para.9; P2005; M.BELL:P1996,para.78; F.TARČIN:P498,paras.3-7;

A.BANBURY:P2451,para.199; AF110; [REDACTED] T.4177-4178;

P1999.

²⁸⁷⁷ S.CRNČALO:P733,para.81.

²⁸⁷⁸ S.CRNČALO:P733,paras.85-86. See also P2018.

family would fall victim to the campaign.²⁸⁷⁹ His fears were realised on 28 August 1995, when his wife, who had gone to buy powdered milk, was killed in the shelling of the marketplace (G19).²⁸⁸⁰

786. Even UN military professionals in Sarajevo for only a fraction of the four-year campaign were affected by this climate of terror.²⁸⁸¹ The success of the terror campaign in accomplishing its purpose was widespread and widely-reported.²⁸⁸² Under these circumstances, the only reasonable conclusion to draw is that the SRK campaign of terror in Sarajevo was a calculated policy with political ends as its objective, whose primary director was Radovan **KARADŽIĆ**.

F. Defence Arguments Should be Rejected

1. Defence shelling arguments are false, pretextual and invalid

787. The Accused's Sarajevo defence consisted largely of calling SRK officers willing to assert that the SRK engaged in precise, targeted shelling and sniping of military targets in compliance with the Geneva Conventions and IHL principles, and that civilian casualties and damage were unintended collateral damage. These self-serving depictions of the campaign are not only completely at odds with the consistent accounts of dozens of experienced military observers who witnessed the campaign over many months, they were facially unreliable. For example, ŠKRBA resorted to the absurd claim that his unit did not fire within one kilometre of hospitals, schools, bus or train stations or "all the areas where larger groups of civilians tend to gather"²⁸⁸³. VELJOVIĆ similarly denied his brigade fired on any targets in Hrasno, Baščaršija, "the town" or "urban neighbourhoods" in order "to avoid civilian casualties" and suggested that any shells that hit the town were the result of incorrect data or wet gunpowder.²⁸⁸⁴ Such claims are not only unsustainable in light of the overwhelming contrary evidence, they are contradicted by other defence witnesses, such as GENGO, who freely admitted firing mortars from Mrkovići at targets in

²⁸⁷⁹ S.CRNČALO:P733,paras.87,91.

²⁸⁸⁰ S.CRNČALO:P733,paras.94-96.

²⁸⁸¹ R.MOLE:T.5819,5823; R.MOLE:P1426,para.86; R.SMITH:T.11333-11334.

²⁸⁸² See Brief,para.645.

²⁸⁸³ D.ŠKRBA:T.29131-29132.

²⁸⁸⁴ S.VELJOVIĆ:T.29282-29283.

inhabited urban areas 2-3 kilometres away, while blaming the other side for failing to take the precautions to avoid civilian casualties.²⁸⁸⁵

788. The Defence also claimed justifications for artillery attacks which, if indeed the basis for firing, represented indiscriminate attacks or disproportionate attacks, *i.e.*, attacks for which the expected civilian casualties would be disproportionate to the concrete and direct military advantage anticipated.²⁸⁸⁶

789. For example, the Defence claims that SRK artillery units targeted mobile mortars. Given the limited number of ABiH mobile mortars,²⁸⁸⁷ only a small fraction of shelling conducted by Serb Forces could plausibly be attributed to allegedly targeting mobile mortars. Yet in any event, returning fire on a mobile mortar was "a pointless mission."²⁸⁸⁸ As MOLE observed, "the time lapse between the initial contact and the response was such that the possibility of the originating units being in the same place were not high."²⁸⁸⁹ The SRK's heavy, dispersed responses, in the few cases where they may have been "responses," can therefore only be viewed as either indiscriminate or highly disproportionate, as the only likely consequence was widespread civilian destruction. Hrasnica resident MIŠČEVIĆ witnessed a Serb response that came more than ten minutes after a mobile mortar round was fired from nearby his apartment, by which point the mortar had disappeared and his apartment building was "quite damaged."²⁸⁹⁰ Likewise, in an example he described as "typical of what happened at the time,"²⁸⁹¹ Senior UNMO WILSON observed a mobile mortar fire two or three rounds of fire and approximately 200 rounds were fired in response scattered "over quite a large area" and unrelated to any particular target: "It was an urban area, full of tall apartment buildings. Many of them were hit and set on fire...such heavy weight of fire that can cause so much damage and so much collateral damage."²⁸⁹² It was "entirely disproportionate."²⁸⁹³

²⁸⁸⁵ S.GENGO:T.29780-29781.

²⁸⁸⁶ *See Galić* AJ,para.90.

²⁸⁸⁷ J.WILSON:P1029,para.53. *See also* M.MANDILOVIĆ:T.5439; I.MIŠČEVIĆ:T.32087-32088; R.MOLE:P1426,para.128; F.THOMAS:T.6841.

²⁸⁸⁸ R.MOLE:T.5893.

²⁸⁸⁹ R.MOLE:T.5893.

²⁸⁹⁰ I.MIŠČEVIĆ:D2765,para.9; I.MIŠČEVIĆ:T.32089.

²⁸⁹¹ J.WILSON:T.4133.

²⁸⁹² J.WILSON:T.4132-4133.

²⁸⁹³ J.WILSON:T.4132-4133.

790. Indeed, Defence witnesses admitted that the SRK did not even take into account the possibility of excessive civilian casualties when planning an artillery attack; asserting that it was up to the ABiH, and not them, to take steps to avoid civilian casualties in inhabited areas.²⁸⁹⁴ Such purposeful blindness to the responsibility to weigh the risk to civilians would inevitably result in disproportionate attacks.

791. Nor could the SRK's failures in this regard be excused by the ABiH's non-compliance with its duty to separate civilians from military objectives. Any such ABiH non-compliance did not relieve Serb Forces of their obligation to comply with the principles of distinction and proportionality.²⁸⁹⁵ Ultimately, given the "pointless[ness]" of such alleged targeting for the reasons described above, such claims represent either post-hoc attempts to justify shelling civilian areas, or contemporary pretexts.

2. Sniping victims were not caught in crossfire

792. Any claim that civilian sniping victims in Sarajevo were hit in the cross-fire of battle fails in light of the consistent evidence that they were shot at times when there were no combat operations in the area,²⁸⁹⁶ and that statistically, the timing of civilian and military casualties was either weakly correlated, or totally uncorrelated.²⁸⁹⁷ As BOWEN explained: "The dead and wounded in Sarajevo were not caught in the crossfire between two warring parties. Instead, between 1992 and 1995 they were subjected to an organised campaign of shelling and sniping by Bosnian Serb forces encircling the city."²⁸⁹⁸

793. As for the Defence argument that Sarajevo was filled with armed troops, this cannot explain the systematic targeting of obviously civilian targets.²⁸⁹⁹

²⁸⁹⁴ S.GENGO:T.29781-29782; S.SIMIĆ:T.30058-30059; M.SLADOJE:T.30573.

²⁸⁹⁵ *Galić* AJ, para.194.

²⁸⁹⁶ [REDACTED]:T.10514-10515; *See, e.g.* M.POPARIĆ: [REDACTED]; P928:V000-4581; [REDACTED]; H.PALO:P119,p.2; S.ŠABANIĆ:P492,para.5; S.LIVNJAK:P495,pp.4,11; T.ŽUNIĆ:P496,p.4; M.KUČANIN:P23,pp.3,4,6; [REDACTED] P1905,para.30; D.HARLAND:P820,para.293. *See* SIS Sniping Appendix,fn.13.

²⁸⁹⁷ E.TABEAU:P4997,p.6; E.TABEAU:P4998,p.5; E.TABEAU:P5002,pp.5,86-91);

E.TABEAU:P5002,p.5. *See also* E.TABEAU:P4997,p.6; E.TABEAU:P4998,p.5.

²⁸⁹⁸ J.BOWEN:P2068,para.24. *See also* KDZ485:P1905,para.30; D.HARLAND:P820,para.293.

²⁸⁹⁹ J.BOWEN:P2068,paras.35,37; A.VANLYNDEN:P926,para.26; A.BANBURY:T.13317; P1822; A.BANBURY:P2451,para.32; A.BANBURY:T.13317; KDZ304:T.10514-10515; AF141.

3. Shelling hospitals was not justified

794. To the extent that **KARADŽIĆ** claims that the ABiH used hospitals for military purposes, or placed military objects near them such, that Serb Forces were entitled to fire on them,²⁹⁰⁰ such arguments are misguided. First, this argument overlooks that hospitals were shelled even when there were no mortars there or military objects in the vicinity.²⁹⁰¹ Second, even assuming the SRK were on occasion engaging a mortar at or near the hospitals, the shelling of the hospital would reflect a disproportionate attack, as both the State Hospital and the Koševo Hospital were frequently penetrated by Serb artillery or direct fire tank rounds on multiple floors.²⁹⁰² Finally, the SRK never gave a warning or time to comply, as required by IHL,²⁹⁰³ prior to firing on Sarajevo hospitals in the event they genuinely believed such hospitals had been transformed into military objects.²⁹⁰⁴

4. The campaign and scheduled incidents were not a BiH government conspiracy

795. The Defence claim that the campaign of sniping and shelling was perpetrated by Muslims attacking themselves as part of a conspiracy to gain international sympathy and eventually military intervention²⁹⁰⁵ should be rejected. International witnesses consistently debunked this, explaining that to the extent it may have occurred it was *de minimus*.²⁹⁰⁶ Any such shelling is insignificant in light of the frequent sniping and shelling attacks conducted by Serb forces during the 44-month campaign of terror. Moreover, the untenability of this general claim is accentuated by SUBOTIĆ's analysis, discussed in the SIS G Incidents Appendix C, which shows that

²⁹⁰⁰ KARADŽIĆ conceded that it was Serb forces that shelled hospitals or areas around hospitals:T.1931,5400,6743. See also B.NAKAŠ:P1525,paras.20-25; B.NAKAŠ:T.6688-6690; P1526; S.GALIĆ:T.38055-38056.

²⁹⁰¹ A.VANLYNDEN:P926,paras.33,35,39; M.MANDILOVIĆ:P1217,paras.37,39. See also paras.38, 40-41; M.MANDILOVIĆ:T.5439; AF95-AF97.

²⁹⁰² J.BOWEN:P2068,para.25; M.MANDILOVIĆ:P1217,paras.42-46,53; B.NAKAŠ:P1525,paras.22-26; P1526; P6336,pp.1-4; P1221:V000-2817,01:54:03-01:54:56; P1222; F.ZAIMOVIĆ:P814,paras.11-13; F.ZAIMOVIĆ:T.1888.

²⁹⁰³ Galić AJ,para.344.

²⁹⁰⁴ F.ZAIMOVIĆ:P814,para.14.

²⁹⁰⁵ P1274:V000-0271.

²⁹⁰⁶ M.BELL:P1996,para.117; M.BELL:T.9920-9921; J.BOWEN:T.10165-10166,10172-10173,10182-10185,10194,10196;10201; J.BOWEN:P2068,para.39; D936,pp.5-6; [REDACTED]; H.KONINGS:T.9346-9349; [REDACTED] T.10517-10519; [REDACTED]; [REDACTED] T.10524; R.MOLE:P1426,paras.120-121; R.MOLE:T.5885-5886,5894-5895,5908-5909; M.ROSE: P1638,para.213; M.KUČANIN:P17,p.37.

attempting to apply these conspiracy theories to specific incidents yields preposterous results.²⁹⁰⁷

5. Serb Forces had equivalent personnel to the ABiH

796. Although the manpower issue is largely irrelevant to the issues relating to the shelling and sniping campaign, the Defence effort to emphasize a huge disparity is in any event inaccurate. In terms of manpower, no dramatic imbalance existed. Former ABiH 1st Corps Chief of Staff Asim DŽAMBAŠOVIĆ said that of the Corps' approximately 30,000 men inside Sarajevo, roughly only a quarter of them had weapons.²⁹⁰⁸ Meanwhile, the SRK had 23,000 men.²⁹⁰⁹ As for a report from TOLIMIR estimating the strength of the 1st Corps of ABiH at 70,000 soldiers,²⁹¹⁰ this represented full mobilisation strength across a vast territory, not in Sarajevo, which, by the VRS-GŠ's own estimate in June 1992 had "around 20,000 armed Muslims and Croats."²⁹¹¹

G. KARADŽIĆ Shared the Intent for the Crimes of Terror, Unlawful Attacks and Murder

797. As discussed above, **KARADŽIĆ** was central to the formulation and implementation of the common criminal purpose to spread terror among the civilian population through a campaign of shelling and sniping encompassing the crimes of terror, unlawful attacks against civilians and murder. As the supreme military and political leader of the Bosnian Serbs, **KARADŽIĆ** was in ultimate command of the SRK, the key forces implementing the common purpose. He recruited and commanded MLADIĆ, who embraced and escalated the terror campaign, and oversaw the modulation of terror as a strategic and political tool. In the face of repeated protests about the criminal nature of his shelling and sniping campaign, **KARADŽIĆ** continued the campaign for over three and a half years, while rewarding and promoting key implementers.²⁹¹² Moreover, as discussed above, the nature,

²⁹⁰⁷ See SIS Shelling Appendix.

²⁹⁰⁸ A.DŽAMBAŠOVIĆ:T.15296-15297. Cf. M.POPARIĆ:T.39209; ██████████.

²⁹⁰⁹ R.PHILIPPS:T.3774.

²⁹¹⁰ R.PHILIPPS:T.3815-3816,3816-3817; D315.

²⁹¹¹ P1478,p.128.

²⁹¹² See IV.C: **KARADŽIĆ** contributed to and shared the common purpose of the Terror JCE.

manner, timing and duration of the campaign²⁹¹³ make clear that terror was its primary purpose. **KARADŽIĆ**'s shared intent for the crimes underlying the common purpose—including his specific intent to spread terror—flows inevitably from these key contributions. In the same manner, as discussed above, other JCE members were aware of the criminal nature and effects of the campaign, acknowledged using the campaign to further their political and strategic interests, and contributed to, supported, and worked with **KARADŽIĆ** to lead the campaign. Their shared intent for the underlying crimes similarly follows.

²⁹¹³ *D.Milošević* AJ, para.37.

V. THE JCE TO ELIMINATE

A. KARADŽIĆ shared the common criminal purpose of the JCE to Eliminate

798. **KARADŽIĆ** directed and approved the forcible removal and murder operations, as the evidence overwhelmingly shows. His actions and statements from at least 11 July and active efforts to cover-up these crimes show that **KARADŽIĆ** intended to destroy the Bosnian Muslims in Srebrenica, and shared this intent with Ratko MLADIĆ and other members of the JCE to Eliminate.²⁹¹⁴

799. The JCE to Eliminate was intrinsically related to the Overarching JCE. Its objective was to eliminate the Bosnian Muslim population in Srebrenica by forcibly removing the Bosnian Muslim women, young children and some elderly men from the Srebrenica enclave ("forcible removal operation"²⁹¹⁵), and executing the men and boys ("murder operation").²⁹¹⁶

800. As described in the Srebrenica Narrative, the objectives of the JCE to Eliminate were achieved by the end of 16 July 1995, with the forcible removal of over 20,000 women, young children and some elderly men from the enclave to ABiH-held territory, and the execution and burial of over 7,000 Bosnian Muslim men and boys. The executions continued into early August, and their cover-up, including the reburials, until at least 1 November 1995.

801. **KARADŽIĆ** had long sought the removal of the Bosnian Muslim population from the eastern enclaves.²⁹¹⁷ He, with MLADIĆ, was the driving force in the final push to end the Muslim presence in Srebrenica and Eastern Bosnia, as exemplified, in

²⁹¹⁴ See V.H.1(c): **KARADŽIĆ** shared the intent to commit genocide.

²⁹¹⁵ For purposes of this section of the Brief, the phrase "forcible removal" encompasses forcible transfer and/or deportation, as alleged in the Indictment at paras.20,68-75.

²⁹¹⁶ The forcible removal and murder operations are described collectively in this part as "Srebrenica crimes".

²⁹¹⁷ See V.E: Goals of **KARADŽIĆ** and BSL for the Podrinje.

March 1995, by "My Order number 7" [Directive 7].²⁹¹⁸ Over the next few months, **KARADŽIĆ** ordered MLADIĆ to prepare to take the enclaves,²⁹¹⁹ met with KRSTIĆ to approve the attack,²⁹²⁰ issued instructions to subordinates directly via corps commanders,²⁹²¹ displayed complete mastery of operational details,²⁹²² ordered the final takeover of Srebrenica town,²⁹²³ deployed MUP forces to Srebrenica, and was informed virtually the moment Srebrenica fell, on the late afternoon of 11 July.²⁹²⁴

802. At that point he bolstered his already tight control, on 11 July appointing a trusted and reliable ethnic cleanser, Miroslav DERONJIĆ, to oversee "civilian" affairs²⁹²⁵ and on 14 July providing him with extraordinary powers to marshal military and police resources.²⁹²⁶ On 13 July, **KARADŽIĆ** sent acting Minister of Interior KOVAČ to the field, and met with him immediately before and after his trip.²⁹²⁷ He also continued to receive direct reports in writing, by telephone and in person from the civilian authorities, MUP and VRS at various levels from MLADIĆ down.²⁹²⁸ **KARADŽIĆ** was informed, for example, the moment that the last Muslims were bussed out of Potočari,²⁹²⁹ his oversight mechanisms were so substantial that on 16 July he knew a fleeing Muslim column had been allowed passage by the DK before the VRS-GŠ did.²⁹³⁰

803. **KARADŽIĆ** sealed the fate of the thousands of Muslims taken prisoner when on 13 July he ordered their removal from Bratunac to Zvornik²⁹³¹—where there was no reason for them to be except to be killed. Throughout, he used his powers to ensure that there would be no interference in the progress of the executions, controlling physical access to the area,²⁹³² fending off immediate and escalating international

²⁹¹⁸ R.ĐURĐEVIĆ:T.25906-25907, 25938-25939, 25959; P4515,p.12; P4515,p.12.

²⁹¹⁹ See V.F.1: **KARADŽIĆ** gave the order to prepare to seize the enclave.

²⁹²⁰ See V.F.2: **KARADŽIĆ** approved the attack on the Srebrenica enclave.

²⁹²¹ See V.F.1.(b): 8 July, **KARADŽIĆ** ordered KRSTIĆ to "go forcefully ahead".

²⁹²² See V.F.1.(b): 8 July, **KARADŽIĆ** ordered KRSTIĆ to "go forcefully ahead".

²⁹²³ See V.G.1.(c): 10 July, **KARADŽIĆ** deployed RS MUP forces to Srebrenica area.

²⁹²⁴ See V.G.1.(d): 11 July, GVERO reported to **KARADŽIĆ**.

²⁹²⁵ See V.G.1.(h): 11 July, **KARADŽIĆ** issued two Decisions/Orders.

²⁹²⁶ See V.G.2.(o): 14 July, **KARADŽIĆ** declared a State of War in Srebrenica – Skelani.

²⁹²⁷ See V.G.2.(g): 13 July, KOVAČ met with MLADIĆ.

²⁹²⁸ See V.D.2: **KARADŽIĆ** was kept informed.

²⁹²⁹ See V.G.2.(h): The 13 July MLADIĆ reported to **KARADŽIĆ** that Srebrenica was done.

²⁹³⁰ See V.G.2.(r): 16 July, **KARADŽIĆ** briefed by KARIŠIK.

²⁹³¹ See V.G.2.(i): 13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

²⁹³² See V.G.2.(t): **KARADŽIĆ** denied access to the Srebrenica area and lied to the media; V.G.3.(b): **KARADŽIĆ** maintained restrictions on access.

concern with a succession of lies²⁹³³ and "pardon[ing]" a handful of men whose murders would too clearly reveal the systemic murder operation.²⁹³⁴ He revelled in the apparent success of the reburials in keeping evidence of the murder operation from the international community,²⁹³⁵ praised and rewarded the perpetrators²⁹³⁶ (while claiming much credit for the Srebrenica operation for himself²⁹³⁷), commissioned sham investigations to whitewash the crimes²⁹³⁸ and directed that inculpatory evidence be hidden or destroyed.²⁹³⁹

804. **KARADŽIĆ**'s oversight of the genocide plan was necessary and instrumental to its success. He approved and directed the forcible removal and murder operations, from the beginning to the end; his only regret ever being that some Muslim men got away.²⁹⁴⁰

B. **KARADŽIĆ** significantly contributed to the common purpose

805. As President and Supreme Commander, **KARADŽIĆ** used his unique position and singular authority over all members of the JCE to Eliminate from the VRS, MUP and civilian authorities, and made, acting in concert with them, significant contributions to, and further the objectives of, the JCE to Eliminate as set out in detail in this part of the Brief.

1. Directing and authorising his subordinates²⁹⁴¹

806. As President of the RS and Supreme Commander of the Armed Forces, **KARADŽIĆ** was the only individual in the RS with the *de jure* and *de facto* authority over all three branches of the RS involved in the forcible removal and murder operations: the VRS, MUP and RS civilian authorities. He alone could direct, approve and authorise the participation of all three in the forcible removal and murder operations.²⁹⁴² The VRS, MUP and civilian authorities obeyed his orders, acted in

²⁹³³ See V.G.2.(t): **KARADŽIĆ** denied access to the Srebrenica area and lied to the media; V.G.2(v):17 July, **KARADŽIĆ** lied to the international media.

²⁹³⁴ See V.G.2.(u): 17-18 July, **KARADŽIĆ** "pardoned" local staff.

²⁹³⁵ See V.G.3.(f): September-October 1995, Reburial operations.

²⁹³⁶ See V.G.3.(d): **KARADŽIĆ** took credit for Srebrenica and praised/rewarded perpetrators.

²⁹³⁷ See V.G.3.(d): **KARADŽIĆ** took credit for Srebrenica and praised/rewarded perpetrators.

²⁹³⁸ See V.G.4.(b): March-April 1996, **KARADŽIĆ** ordered cover-up investigations.

²⁹³⁹ See V.G.3.(d): **KARADŽIĆ** took credit for Srebrenica and praised/rewarded perpetrators.

²⁹⁴⁰ See V.G.6: **KARADŽIĆ** obstructed ICTY investigations.

²⁹⁴¹ Indictment, paras.14(d) and 24.

²⁹⁴² See V.C: Membership of the JCE to Eliminate.

concert, and reported to him throughout in carrying out the operations. **KARADŽIĆ**'s command relationship with the RS Armed Forces was intact and he was in regular and direct contact with **MLADIĆ**, **KOVAČ** and other VRS and RS MUP personnel throughout the Srebrenica events.²⁹⁴³

807. **KARADŽIĆ** directed his subordinates to carry out specific acts in furtherance of the JCE's objectives.²⁹⁴⁴ On the night of 11 July, **KARADŽIĆ** and his subordinate **MLADIĆ** took significant, concrete steps to implement the JCE to Eliminate. That night, **KARADŽIĆ** also issued written decisions/orders setting up Bosnian Serb civilian structures in Srebrenica,²⁹⁴⁵ and met with **KARIŠIĆ**, in advance of the operation to takeover Potočari the following day.²⁹⁴⁶ **KARADŽIĆ** also appointed his trusted confidante **DERONJIĆ** as Civilian Commissioner of Srebrenica, and remained in close contact with him throughout these events.²⁹⁴⁷ At the same time, **MLADIĆ**, at a meeting at Hotel Fontana in Bratunac, took steps to secure the surrender of the Bosnian Muslim men. He promised, falsely: "we guarantee that everybody will live, even those who committed crimes against our people."²⁹⁴⁸ The identification and detention of the Muslim men in Potočari represented an integral part of, and the first step in, the murder operation.²⁹⁴⁹

808. Significantly, on 13 July, **KARADŽIĆ** sent **KOVAČ** to the field to arrange logistics for the murder operation with **MLADIĆ**, then spoke directly with **MLADIĆ**, and then ordered that the thousands of Muslim prisoners be moved from Bratunac to Zvornik, where they were to be killed.²⁹⁵⁰ **KARADŽIĆ**'s orders were implemented by the VRS and MUP, starting that night.²⁹⁵¹

²⁹⁴³ See V.D.2: **KARADŽIĆ** was kept informed.

²⁹⁴⁴ Indictment, paras.14(d) and 24.

²⁹⁴⁵ See V.G.1.(h): 11 July, **KARADŽIĆ** issued two Decisions/Orders.

²⁹⁴⁶ See V.G.1.(h): 11 July, **KARADŽIĆ** issued two Decisions/Orders.

²⁹⁴⁷ See V.G.1.(h): 11 July, **KARADŽIĆ** issued two Decisions/Orders; V.D:Reporting Chain to **KARADŽIĆ**.

²⁹⁴⁸ P4202,p.241. See V.G.1.(j): 11 July, Second Hotel Fontana Meeting.

²⁹⁴⁹ See Srebrenica Narrative, paras.19-23.

²⁹⁵⁰ See V.G.2.(g): 13 July, **KOVAČ** met **MLADIĆ**; V.G.2(i):13 July **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

²⁹⁵¹ See V.G.2.(i): 13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik; V.G.2.(m):14 July, MUP secure transport of the convoy of prisoners to Zvornik; Srebrenica Narrative, paras.97-98.

2. Participating in the design or formulation of acts²⁹⁵²

809. **KARADŽIĆ** participated in the design and formulation of acts carried out by his subordinates in the implementation of the JCE to Eliminate, primarily through issuing orders and oversight, via meetings and conversations with his fellow JCE members, including with his subordinates MLADIĆ, KOVAČ and DERONJIĆ.²⁹⁵³ He supervised his subordinates' implementation of these acts in person, over the phone and through daily written reports.²⁹⁵⁴

3. Facilitating and encouraging his subordinates and failing to prevent or punish the crimes²⁹⁵⁵

810. **KARADŽIĆ** deliberately failed to take measures to prevent, punish or investigate his subordinates' involvement in crimes he knew were being, and had been, committed pursuant to the JCE to Eliminate.²⁹⁵⁶ In addition to his deliberate inaction, he praised and promoted key JCE members such as DERONJIĆ²⁹⁵⁷ and KRSTIĆ.²⁹⁵⁸ **KARADŽIĆ** created and sustained an environment of impunity, through which he encouraged the ongoing implementation of the JCE to Eliminate and utterly failed to protect the Bosnian Muslims of Srebrenica.²⁹⁵⁹

811. **KARADŽIĆ** took the lead in keeping the international community at bay so that implementation of the JCE to Eliminate could proceed to its full conclusion unchecked and without external pressure.²⁹⁶⁰ **KARADŽIĆ** deliberately disseminated false information to the media²⁹⁶¹ and denied or deliberately ignored requests by UN and international humanitarian agencies for access to Srebrenica, Bratunac and

²⁹⁵² Indictment, paras. 14(e) and 24.

²⁹⁵³ See V.G.1: Formation and Initial Steps of the Implementation and Cover-Up of the JCE to Eliminate; V.G.3: Continued implementation of the JCE to Eliminate including its cover-up.

²⁹⁵⁴ See V.D.2: **KARADŽIĆ** was kept informed.

²⁹⁵⁵ Indictment, paras. 14(a), (d), (g), (h), (i) and 24.

²⁹⁵⁶ Indictment, paras. 14(g), (h) and 24. See V.G.3(e): No investigation or prosecution of Srebrenica Crimes; V.G.4(b): March-April 1996, **KARADŽIĆ** ordered cover-up investigations.

²⁹⁵⁷ See V.G.1(h): 11 July, **KARADŽIĆ** issued two Decisions/Orders. See V.G.2(o): 14 July, **KARADŽIĆ** declared a State of War in Srebrenica-Skelani.

²⁹⁵⁸ See V.G.2(h): 13 July, MLADIĆ reported to **KARADŽIĆ** that Srebrenica was done.

²⁹⁵⁹ Indictment, paras. 14(d), (h) and 24.

²⁹⁶⁰ Indictment, paras. 14(d) and 24.

²⁹⁶¹ Indictment, paras. 14(c), (i) and 24. See V.G.2(t): **KARADŽIĆ** denied access to the Srebrenica area and lied to the media; V.G.2(v): 17 July, **KARADŽIĆ** lied to the international media.

Zvornik in July and August 1995, despite pressures from these actors to investigate the mass executions.²⁹⁶²

812. Once it became apparent that the international community had learned of the executions, VRS, MUP and civilian authorities subordinate to **KARADŽIĆ**, with his approval, engaged in a highly secret and coordinated operation to conceal the murders by exhuming the bodies of Muslim men from the initial mass grave sites and transferring them to secondary grave sites in more remote areas.²⁹⁶³ The reburials were part of a continuing cover-up of Srebrenica crimes, including MLADIĆ's 13 July order regulating access and banning the provision of information about prisoners,²⁹⁶⁴ **KARADŽIĆ**'s order to move prisoners to Zvornik away from the full glare of international attention in Bratunac,²⁹⁶⁵ and his continued approval of cover-up efforts by the VRS security organs and DB including (a) in August 1995, finding Muslim prisoners to exchange in lieu of the executed men of Srebrenica;²⁹⁶⁶ and (b) in October 1995, repressing the investigation of Srebrenica crimes by US journalist David ROHDE.²⁹⁶⁷ **KARADŽIĆ** also supported the cover-ups through his continued public praise of the Srebrenica operation.²⁹⁶⁸ Through the cover-ups, he directed, encouraged, facilitated and authorised acts in furtherance of the objective of the JCE to Eliminate.²⁹⁶⁹

813. The VRS, MUP and civilian authorities subordinate to **KARADŽIĆ** are described in section (C) and the reporting chains to **KARADŽIĆ** in section (D) below.

C. Membership of the JCE to Eliminate

814. During the Srebrenica events, as President of the RS and Supreme Commander of the Armed Forces, **KARADŽIĆ** commanded the VRS, MUP and

²⁹⁶² See V.G.2(t): **KARADŽIĆ** denied access to the Srebrenica area and lied to the media; V.G.3(b): **KARADŽIĆ** maintained restrictions on access.

²⁹⁶³ See V.G.3.(f): September-October 1995, Reburial operations.

²⁹⁶⁴ See V.G.2.(f): 13 July, MLADIĆ issued written order controlling access and information.

²⁹⁶⁵ See V.G.2.(i): 13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

²⁹⁶⁶ See V.G.3.(c): **KARADŽIĆ** under pressure to find prisoners for exchange.

²⁹⁶⁷ See V.G.3.(g): October 1995, ROHDE arrested. Indictment, paras.14(d),(h) and 24.

²⁹⁶⁸ See V.G.3.(d): **KARADŽIĆ** took credit for Srebrenica and praised/rewarded perpetrators.

²⁹⁶⁹ Indictment, paras.14(d) and 24. See also Indictment paras.14(a) and 24.

Civilian Protection.²⁹⁷⁰ **KARADŽIĆ** alone had the *de jure* and *de facto* authority to direct and approve the involvement of the VRS, MUP and RS civilian authorities in the JCE to Eliminate and ensure that they worked in coordination. During the Srebrenica events and the cover-up operations, all members of the JCE to Eliminate within the VRS, MUP and civilian authorities (including Civilian Protection) acted under **KARADŽIĆ**'s authority and control.

1. MLADIĆ and the VRS

815. In addition to **KARADŽIĆ**, MLADIĆ participated in the JCE as one of its two key members. Despite some tensions between them,²⁹⁷¹ **KARADŽIĆ** and he shared the objectives of the JCE to Eliminate and worked together in pursuing that objective, in accordance with the military chain of command.²⁹⁷²

816. The following military personnel were either JCE members or were used by JCE members to implement the common criminal objective: TOLIMIR;²⁹⁷³ MILETIĆ;²⁹⁷⁴ GVERO;²⁹⁷⁵ BEARA;²⁹⁷⁶ SALAPURA; Radoslav JANKOVIĆ; KESEROVIĆ; TRKULJA; KRSTIĆ;²⁹⁷⁷ POPOVIĆ;²⁹⁷⁸ PANDUREVIĆ;²⁹⁷⁹ BLAGOJEVIĆ;²⁹⁸⁰ OBRENOVIĆ;²⁹⁸¹ JOKIĆ;²⁹⁸² Momir NIKOLIĆ;²⁹⁸³ Drago

²⁹⁷⁰ "Karadžić as the supreme commander of the armed forces does not command the army or the police or the civilian protection directly. Rather, he does that through Ratko Mladić, he commands the army. Through the Ministry of the Interior, he commands the police. And through the chief or commander [...] in charge of civilian protection, he commands the civilian protection." M.MILOVANOVIĆ:T.25444-25445. See also P.ŠKRBIĆ:T.25972,26023-26026; R.BUTLER:P4917,paras.2.0-2.1; R.BUTLER:T.27430-27431.

²⁹⁷¹ See D3879; P2565,pp.2-4; P4555; P2566,p.2; D2843.

²⁹⁷² See P6407,p.3; P5237. Even after **KARADŽIĆ**'s attempt to dismiss him, MLADIĆ maintained he was not willing to take a role other than that of a soldier. MLADIĆ said: "I do not want to wash my hands in dirty political waters". P2286,p.2; R.SMITH:T.11448-11449.

²⁹⁷³ Convicted on 12 December 2012 of committing Genocide, Conspiracy to Commit Genocide, Extermination, Murder (war crime), Persecution, Inhumane Acts (forcible transfer).

²⁹⁷⁴ Convicted on 10 June 2010 of committing Murder (crime against humanity), Persecution, Inhumane Acts (forcible transfer).

²⁹⁷⁵ Convicted on 10 June 2010 of committing Persecution, Inhumane Acts (forcible transfer).

²⁹⁷⁶ Convicted on 10 June 2010 of committing Genocide, Extermination, Murder (war crime), Persecution.

²⁹⁷⁷ Convicted on 19 April 2004, following appeal, of aiding and abetting Genocide, Extermination, Persecution and Murder (war crime), and committing Murder (war crime) and Persecution.

²⁹⁷⁸ Convicted on 10 June 2010 of committing Genocide, Extermination, Murder (war crime), Persecution.

²⁹⁷⁹ Convicted on 10 June 2010 of aiding and abetting Murder (crime against humanity), committing Murder (war crime), Persecution, Inhumane Acts (forcible transfer), and under Article 7(3) of the Statute, Murder (crime against humanity), Murder (war crime).

²⁹⁸⁰ Convicted on 9 May 2007, following appeal, of aiding and abetting Murder (Crime Against Humanity), Murder (war crime), Persecution, Inhumane Acts (forcible transfer).

NIKOLIĆ;²⁹⁸⁴ TRBIĆ.²⁹⁸⁵ Other commanders, assistant commanders and senior VRS officers operating in or with responsibility over territory within the DK AOR and/or Trnovo municipality also participated in the JCE as either members or tools.

(a) VRS-GŠ

817. The VRS-GŠ structure in July 1995 is described in the charts attached as Appendix E,²⁹⁸⁶ and amplified in the evidence of BUTLER,²⁹⁸⁷ MILOVANOVIĆ²⁹⁸⁸ and OBRADOVIĆ.²⁹⁸⁹ In July 1995, MILETIĆ headed the Operations and Training Administration²⁹⁹⁰ and was also standing in as VRS Chief of Staff, in the absence of MILOVANOVIĆ.²⁹⁹¹ GVERO headed the Sector for Moral Guidance, Religious and Legal Affairs.²⁹⁹² TOLIMIR was Assistant Commander and Chief of the Sector for Intelligence and Security Affairs.²⁹⁹³ BEARA, Chief of the Security Administration, and SALAPURA, Chief of the Intelligence Administration, were subordinate to TOLIMIR.²⁹⁹⁴

²⁹⁸¹ Following guilty plea, found guilty of aiding and abetting, and under Article 7(3), Persecution on 10 December 2003.

²⁹⁸² Convicted on 9 May 2007, following appeal, of aiding and abetting Extermination, Murder (war crime), Persecution.

²⁹⁸³ Following guilty plea, convicted on 8 March 2006 of committing Persecution.

²⁹⁸⁴ Convicted on 10 June 2010 of aiding and abetting Genocide, and committing Extermination, Murder (war crime), Persecution.

²⁹⁸⁵ Convicted of committing Genocide before the State Court of BiH. V.POPOVIĆ:T.43025.

²⁹⁸⁶ VRS Organisational Charts:P4920. *See also* P4920,p.1; P4446.

²⁹⁸⁷ R.BUTLER:P4913,paras.2.0-2.13; R.BUTLER:P4914,para.2.20. *See also* VRS organisational charts:P4920,p.1; P4446.

²⁹⁸⁸ M.MILOVANOVIĆ:T.25441-25444.

²⁹⁸⁹ Lj.OBRADOVIĆ:T.25089-25093; Lj.OBRADOVIĆ:P4444,pp.7-19,27-34.

²⁹⁹⁰ P4446; P4920,p.1; P.ŠKRBIĆ:P4523,p.41. *See also* P.ŠKRBIĆ:P4523,p.124.

²⁹⁹¹ P.ŠKRBIĆ:P4523,pp.42-45,49-52,124-126. *See also* VRS-GŠ reports to KARADŽIĆ type-signed by MILETIĆ, "Standing in for the Chief of Staff":D2102; D2103; D2104; D2105; D2106; P4459; D2118; D2119; D2094; D2107; P4461; P4464; Lj.OBRADOVIĆ:P4444,p.10.

²⁹⁹² M.MILOVANOVIĆ:T.25442; P4920,p.1; L.OBRADOVIĆ:P4444,pp.12,23; P.ŠKRBIĆ:P4523,pp.134-135.

²⁹⁹³ Z.TOLIMIR:T.45063; R.BUTLER:T.27536; M.NIKOLIĆ:T.24837; Lj.OBRADOVIĆ:T.25123.

²⁹⁹⁴ M.MILOVANOVIĆ:T.25442; Lj.OBRADOVIĆ:T.25123; Lj.OBRADOVIĆ:P4444,pp.24,37; M.BIRCAKOVIĆ:P360,p.6; P.SALAPURA:D3720,pp.2,3,5,7,11; AF1461; D3721; D3722; P.ŠKRBIĆ:P4523,p.38. *See also* R.BUTLER:P4917,paras.2.13-2.15.

(b) DK

818. KRSTIĆ assumed command of the VRS DK from ŽIVANOVIĆ at some time before 20:00 on 13 July 1995.²⁹⁹⁵ KARADŽIĆ approved the appointment earlier that day,²⁹⁹⁶ and on 14 July, signed a formal Presidential Decree to that effect.²⁹⁹⁷

819. POPOVIĆ was DK Chief of Security.²⁹⁹⁸ While directly commanded by the commander of the unit or institution to which they were assigned, the professional activities of VRS security and intelligence organs fell under the purview of the VRS-GŠ Sector for Intelligence and Security Affairs.²⁹⁹⁹ Brigade security (or intelligence and security)³⁰⁰⁰ organs were similarly responsible for directing the work of the intelligence and security organs of subordinate units.³⁰⁰¹ POPOVIĆ was thus professionally managed by BEARA,³⁰⁰² and himself professionally managed the activities of the 1st Bratunac Light Infantry Brigade's Assistant Commander for Intelligence and Security Affairs, Momir NIKOLIĆ,³⁰⁰³ and the 1st Zvornik Infantry Brigade's Assistant Commander for Security Affairs, D.NIKOLIĆ.³⁰⁰⁴

820. DK subordinate units participating in the Srebrenica crimes included the 1st Bratunac Light Infantry Brigade and the 1st Zvornik Infantry Brigade, commanded in July 1995 by BLAGOJEVIĆ and PANDUREVIĆ, respectively.³⁰⁰⁵

821. Brigade security (or intelligence and security)³⁰⁰⁶ organs managed the activities of the military police unit of the brigade.³⁰⁰⁷ In July 1995, the Bratunac

²⁹⁹⁵ P4485.

²⁹⁹⁶ S.RISTIĆ:P4556,pp.26-27,34-41,43-47,50; S.RISTIĆ:T.26071-26076,26088;

T.PREMOVIĆ:P4911,pp.48,54,61-66,71-72,79; T.PREMOVIĆ:T.27414-27415;

S.TRIFKOVIĆ:D2905,paras.24-35; S.TRIFKOVIĆ:T.33353-33359. *See also* D2239.

²⁹⁹⁷ P3044; P2242,p.91; P.ŠKRBIĆ:T.25977-25978; P.ŠKRBIĆ:P4523,pp.23-25,79-82;

R.BUTLER:P4913,paras.4.0-4.5.

²⁹⁹⁸ P4920,p.2; R.BUTLER:P4914,para.2.4; M.BIRČAKOVIĆ:P360,pp.6,18-19; *see also* P4388;

AF1445; AF1453.

²⁹⁹⁹ R.BUTLER:P4917,para.2.15; R.BUTLER:P4915,paras.3.13-3.14; P4913,para.3.0.

³⁰⁰⁰ R.BUTLER:P4915,para.3.9.

³⁰⁰¹ R.BUTLER:P4915,para.3.10.

³⁰⁰² P4920,p.2; D.OBRADOVIĆ:P4444,pp.270-271; D.OBRADOVIĆ:P4444,pp.271-272.

³⁰⁰³ R.BUTLER:P4915,para.3.16; R.BUTLER:P4914,para.2.8. *See also* P4920,p.4.

³⁰⁰⁴ R.BUTLER:P4915,para.3.16; R.BUTLER:P4914,para.2.8. *See also* P4920,p.3.

³⁰⁰⁵ AF1448; AF1458; AF1459; R.BUTLER:P4914,para.2.8; V.BLAGOJEVIĆ:T.45013;

V.BLAGOJEVIĆ:T.45045-45046; P.SALAPURA:D3720,p.19. *See also* AF1454; AF1455; AF1456;

P4920:pp.2-4; P4941,p.6; R.BUTLER:T.27435; R.BUTLER:P4913; R.BUTLER:P4915. *See also*

L.BOJANOVIĆ:P116,pp.21-36.

³⁰⁰⁶ R.BUTLER:P4915,para.3.9.

³⁰⁰⁷ R.BUTLER:P4915,paras.3.12-3.15.

Brigade Military Police Platoon was commanded by Mirko JANKOVIĆ,³⁰⁰⁸ who was subordinate to BLAGOJEVIĆ.³⁰⁰⁹ His immediate professional superior was M.NIKOLIĆ.³⁰¹⁰

822. The Zvornik Brigade MP Company was commanded by JASIKOVAC,³⁰¹¹ who was subordinate to PANDUREVIĆ. His immediate professional superior was D.NIKOLIĆ.³⁰¹²

(c) VRS-GŠ units in the DK AOR

823. The 10th DOD, a VRS-GŠ unit directly subordinated to MLADIĆ and under the professional control of the Intelligence Administration,³⁰¹³ was deployed to the Srebrenica area on 10 July.³⁰¹⁴ In July 1995 the 10th DOD comprised 50-60 men in two platoons,³⁰¹⁵ and was commanded by PELEMIS.³⁰¹⁶

824. The 65th ZMTP, a VRS-GŠ unit commanded by Milomir SAVČIĆ,³⁰¹⁷ notably included a Military Police Battalion, commanded by Zoran MALINIĆ (aka "Zoka"),³⁰¹⁸ which was headquartered in Nova Kasaba, on the Milići-Konjević Polje-Zvornik road.³⁰¹⁹

³⁰⁰⁸ R.BUTLER:P4914,para.2.8; P4920,p.4; M.NIKOLIĆ:T.24570; [REDACTED]

[REDACTED]. See also M.PETROVIĆ:D4218,pp.1,3.

³⁰⁰⁹ P4920,p.4.

³⁰¹⁰ M.NIKOLIĆ:D2081,para.1; [REDACTED]. See also M.NIKOLIĆ:D2081,para.9; M.PETROVIĆ:D4218,p.1; P4920,p.4(M.NIKOLIĆ was subordinate to Bratunac Brigade Commander BLAGOJEVIĆ); M.NIKOLIĆ:D2081,paras.8-10;

[REDACTED]
³⁰¹¹ R.BUTLER:P4914,para.2.8; P4920,p.3; M.BIRČAKOVIĆ:P360,p.6; [REDACTED]

³⁰¹² M.BIRČAKOVIĆ:P9208; M.GALIĆ: [REDACTED]; M.BIRČAKOVIĆ:P360,pp.5,6,154; P4920,p.3; AF1457; [REDACTED]

³⁰¹³ P4920,p.1; P4446; R.BUTLER:P4914,para.2.13; Lj.OBRADOVIĆ:P4444,pp.35,47; AF1462; D.TODOROVIĆ:P4353,p.5; P.SALAPURA:D3720,p.20; D.ERDEMOVIĆ:P332,p.13; P6408; P.ŠKRBIĆ:T.25969-25970. See also P4487.

³⁰¹⁴ D.ERDEMOVIĆ:P332,pp.17-18,82; D.ERDEMOVIĆ:T.25362; P4351;

[REDACTED]
³⁰¹⁵ D.ERDEMOVIĆ:P332,pp.10-11,13; D.TODOROVIĆ:P4353,p.5; F.KOS:D3927,pp.3-4.

³⁰¹⁶ D.ERDEMOVIĆ:P332,pp.14,31,83; P.SALAPURA:D3720,p.20. See also P4488,p.3. Members included Dragan ERDEMOVIĆ and Franc KOS. D.ERDEMOVIĆ:P332,pp.10-11,13-14,41-42; F.KOS:T.42358; F.KOS:D3927,p.4.

³⁰¹⁷ P4920,p.1; P4446; BUTLER:P4914,para.2.12; M.SAVČIĆ:D3918,paras.24-25; Lj.OBRADOVIĆ:T.24123; P.SALAPURA:D3720,p.19; Lj.OBRADOVIĆ:P4444,p.38; see also D3920; D3926.

³⁰¹⁸ M.SAVČIĆ:T.42257-42258.

³⁰¹⁹ P.SALAPURA:D3720,p.19; M.SAVČIĆ:D3918,paras.26-27; Lj.OBRADOVIĆ:P4444,pp.37-38; R.BUTLER:P4914,para.2.12. See also AF1471.

2. KOVAČ, BOROVCANIN and the MUP

825. MUP authorities who participated in the JCE as either members or tools were MUP commanders, assistant commanders, senior officers and chiefs operating in or with responsibility over territory within the DK AOR and/or Trnovo municipality, including KOVAČ and BOROVCANIN, as well as members of the Scorpions, a Serbian MUP unit.

826. During the Srebrenica events, KOVAČ was both Deputy and acting Minister of the Interior,³⁰²⁰ and Commander of the Police Forces Command Staff ("Staff")³⁰²¹ created in late June 1995 "to command police forces in the zone in which a state of war has been declared."³⁰²² Members of the Staff included Milenko KARIŠIK,³⁰²³ then also Head of the RJB³⁰²⁴ and *de jure* and *de facto* subordinate to KOVAČ.³⁰²⁵

827. BOROVCANIN was Deputy Commander of the SBP of the RS MUP,³⁰²⁶ and commander of a MUP unit deployed to the Srebrenica area by KARADŽIĆ on 10 July 1995.³⁰²⁷ Upon his deployment to the Srebrenica area, BOROVCANIN was re-subordinated to KRSTIĆ,³⁰²⁸ but continued to report to KOVAČ in his positions as Deputy and acting Minister of the Interior,³⁰²⁹ and Police Forces Staff Commander.³⁰³⁰ BOROVCANIN also later commanded MUP units in search operations in the Bratunac and Zvornik areas, as ordered by Goran SARIĆ on 17 July 1995.³⁰³¹ SARIĆ was Commander of the SBP.³⁰³²

³⁰²⁰ C.NIELSEN:T.16309. *See also* T.KOVAČ:T.42719-42720.

³⁰²¹ P2981,p.1; T.KOVAČ:T.42720.

³⁰²² P2981; T.KOVAČ:T.42720; M.KARIŠIK:T.40596. *See also* R.BUTLER:P4915,paras.6.1-6.2; P4923,p.1.

³⁰²³ P2981,p.1; T.KOVAČ:T.42720; M.KARIŠIK:T.40596.

³⁰²⁴ C.NIELSEN:T.16308-16309.

³⁰²⁵ C.NIELSEN:T.16308-16309; T.KOVAČ:T.42736. *See also* M.KARIŠIK:T.40625-40626.

³⁰²⁶ Lj.BOROVCANIN:D3659,paras.10-11; Lj.BOROVCANIN:T.39436;

R.BUTLER:P4914,para.2.15; M.PEPIĆ:P373,p.4.

³⁰²⁷ P2992/P2993(duplicates); Lj.BOROVCANIN:D3659,paras.10,15; T.KOVAČ:T.42732-42737. *See* V.G.1(c):10 July, KARADŽIĆ deployed RS MUP forces to Srebrenica area.

³⁰²⁸ P2992/P2993(duplicates); P2993; R.BUTLER:27496-27498. *See also* P4960,p.1.

³⁰²⁹ C.NIELSEN:T.16308.

³⁰³⁰ P2987; C.NIELSEN:T.16323. As of June 1995, the RS MUP had its seat in Bijeljina, but also maintained important offices at Pale. Orders, instructions and other documentation during this period were issued through the offices in Bijeljina and Pale. C.NIELSEN:T.16310-16311. Reports to the MUP and/or the Police Forces Command Staff and/or to KOVAČ directly were sent to both Pale and Bijeljina to ensure that KOVAČ, and his subordinates, were informed of their content.

C.NIELSEN:T.16314. *See also* P5166; P2983; P5153.

³⁰³¹ P5097,p.1.

³⁰³² Lj.BOROVCANIN:T.39436; R.BUTLER:P4914,para.2.15; M.PEPIĆ:P373,p.4.

828. **KARADŽIĆ** had the authority to engage MUP units in combat.³⁰³³ He ordered the deployment of MUP units upon request by the VRS-GŠ,³⁰³⁴ and only he had the power to issue orders to the MUP and VRS jointly.³⁰³⁵ MUP units deployed in combat operations retained their structure but were re-subordinated to VRS units.³⁰³⁶

(a) Structure of the RS MUP in the DK zone

829. The independent MUP unit deployed to Srebrenica under BOROVIČANIN's command comprised the 2nd Special Police Detachment from Šekovići, the 1st Zvornik PJP Company and the 1st MUP Company from the Jahorina Training Centre.³⁰³⁷

830. The 2nd Šekovići Detachment was an SBP detachment commanded by Rade ČUTURIĆ (aka "Oficir") in July 1995.³⁰³⁸ Its third platoon (third "Skelani" platoon) was led by Milenko TRIFUNOVIĆ.³⁰³⁹ Duško JEVIĆ, Assistant Commander for Operations and Training for the Special Police Brigade, led the MUP from the Jahorina Training Centre. The 1st MUP Company from Jahorina was commanded by Mendeljev (aka "Mane") ĐURIĆ (KW118).³⁰⁴⁰

831. The 1st Zvornik PJP Company was one of six PJP companies subordinated to the Zvornik CJB.³⁰⁴¹ These PJP companies comprised of ordinary policemen from the SJBs subordinated to the Zvornik CJB.³⁰⁴² Danilo ZOLJIĆ was in overall command of the PJP units. Radomir PANTIĆ commanded the 1st Zvornik PJP Company.³⁰⁴³

³⁰³³ P4923; R.BUTLER:P4915,paras.6.1-6.2; R.BUTLER:T.27454-27456; Lj.OBRADOVIĆ:T.25320. For example, in March 1995, the 2nd Zvornik PJP Company was deployed to Konjević Polje on 23 March 1995, following TOLIMIR's recommendation and **KARADŽIĆ**'s order of 21 March 1995. P330; P5086,p.2; P329.

³⁰³⁴ P4923; R.BUTLER:T.27454-27456; L.OBRADOVIĆ:T.25320; P329.

³⁰³⁵ See e.g. on 26 March 1995, **KARADŽIĆ** issued an order on general mobilisation(P2248) which was transmitted down the chain of command:P2250. See also P5180; P2251.

³⁰³⁶ P4923,p.2; R.BUTLER:P4915,paras.6.2-6.4; R.THEUNENS:T.16890-16891; L.OBRADOVIĆ:T.25320.

³⁰³⁷ P4960,p.1. The mixed company of joint RSK, Serbian and RS MUP forces never arrived:R.BUTLER:T.27498-27499.

³⁰³⁸ M.PEPIĆ:P373,p.4; P4960,p.5.

³⁰³⁹ M.PEPIĆ:P373,pp.5-6.

³⁰⁴⁰ P4960,pp.1,5; M.ĐURIĆ(KW118):D3903,paras.4-6; [REDACTED]

[REDACTED] See also M.ĐURIĆ(KW118):T.42076-T.42079. Mendeljev "Mane" ĐURIĆ (KW118) should not be confused with Mane ĐURIĆ (KW117), Deputy Chief of the Zvornik CJB. M.ĐURIĆ (KW118) was convicted of genocide in proceedings before the State Court in 2012. P6378.

³⁰⁴¹ R.BUTLER:P4914,paras.2.16-2.17; P4970. See also P4949.

³⁰⁴² R.BUTLER:P4914,para-2.17; D.MIČIĆ:T.36242-36243; N.DERONJIĆ:D3760,p.30.

³⁰⁴³ D.MIČIĆ:D3196,paras.15-16; D.MIČIĆ:T.36243-36245; P4960,p.5.

832. During the Srebrenica events, Dragomir VASIĆ was Chief of the Zvornik CJB,³⁰⁴⁴ and Mane ĐURIĆ(KW117) his deputy.³⁰⁴⁵ The SJBs in Bratunac and Srebrenica-Skelani were subordinated to the Zvornik CJB and therefore VASIĆ.³⁰⁴⁶ VASIĆ reported to the Police Forces Command Staff, including KOVAČ,³⁰⁴⁷ and to KOVAČ in his function as Deputy/acting Minister.³⁰⁴⁸

833. Other MUP units were subsequently deployed to the Srebrenica area, including a second company from the Jahorina Training Centre under the command of Nedo IKONIĆ,³⁰⁴⁹ elements of the 4th Special Police Detachment from Janja, and additional PJP companies.³⁰⁵⁰

(b) The Scorpions

834. The Scorpions were a Serbian MUP unit based in Đeletovci, in what was then RSK.³⁰⁵¹ They were deployed to the Trnovo front in late June³⁰⁵² under BOROVIĆANIN.³⁰⁵³

(c) State Security Service

835. KIJAC, head of the DB during the Srebrenica events, and *de jure* and *de facto* subordinate to KOVAČ,³⁰⁵⁴ also reported directly to KARADŽIĆ.³⁰⁵⁵

836. During the Srebrenica events, DB operatives worked in the Potočari, Bratunac, and Zvornik areas, as described in KIJAC's regular written reports to KOVAČ and

³⁰⁴⁴ M.ĐURIĆ(KW117):T.35031; D.MIČIĆ:T.36244-36245; R.BUTLER:P4914,para.2.17. *See e.g.* P4949; P5152.

³⁰⁴⁵ M.ĐURIĆ(KW117):T.35031.

³⁰⁴⁶ *See* P2995; P6427; P6428; P4966.

³⁰⁴⁷ P5159; P2985; P2996/P4373; P4937; P4935; P6189; P4942; P4949; P5137; P5191; P5138; P5152; P4965; P5141; P5088.

³⁰⁴⁸ P5159; P2985; P2996/P4373; P4937; P4935; P6189; P4942; P4949; P5191; P5138; P5152; P4965; P5141; P5088.

³⁰⁴⁹ P4960,pp.3,5.

³⁰⁵⁰ P4960,p.3.

³⁰⁵¹ S.STOJKOVIĆ:P4751,pp.2-3; R.THEUNENS:P3033,pp.6,189-190; [REDACTED]

³⁰⁵² P2983; P5153. *See also* [REDACTED]

P665,00:05:00-00:11:20.

³⁰⁵³ C.NIELSEN:T.16314-16319; M.KARIŠIĆ:T.40600-40602,40687-40688; S.STOJKOVIĆ:P4751,pp.8-9; P4960,p.1; P2983; P5153. *See also* P2984/P6421; P5169; P665,00:05:00-00:11:20,00:36:00-00:38:00(Scorpions' departure from Djelakovci, 25 June 1995; their arrival in Jahorina/Pale, 26 June 1995(00:11:20)); D783; [REDACTED]; [REDACTED]

³⁰⁵⁴ D.KIJAC:T.44320.

³⁰⁵⁵ D.KIJAC:T.44321,44329-44330; P6538; D.KIJAC:D4143,para.39. *See also* D4155,p.8.

KARIŠIĆ.³⁰⁵⁶ These operatives reported up the DB reporting chain to KIJAC.³⁰⁵⁷ Goran RADOVIĆ was head of the CRDB in Bijeljina.³⁰⁵⁸ Under him, Mile RENOVIĆ was head of the DB department in Zvornik. SDB operatives in the Bratunac area—including Potočari—included Vito TOMIĆ and Siniša GLOGOVAC.³⁰⁵⁹ They reported the content of UNMO reports on the humanitarian situation,³⁰⁶⁰ worked alongside DK security organs,³⁰⁶¹ interrogated prisoners,³⁰⁶² shared information with MUP units³⁰⁶³ and BOROVIĆANIN,³⁰⁶⁴ and reported on the Hotel Fontana meetings.³⁰⁶⁵ DB operatives also reported from the Zvornik area about prisoners,³⁰⁶⁶ and the activities of the column of Muslim men.³⁰⁶⁷ Sources of information for DB operatives included international organisations³⁰⁶⁸ and PoWs.³⁰⁶⁹

3. DERONJIĆ and other civilian structures

837. Other republic level and regional, municipal and local level members of the RS political and governmental organs with responsibility in or for the Srebrenica, Vlasenica, Bratunac and/or Zvornik municipalities, including Miroslav DERONJIĆ, were also members of the JCE, or were used by JCE members to implement the common criminal objective.

³⁰⁵⁶ P4933; P5091; P4939; P4389; P5093; D2058; P5092; P4981; P5094; P5095; P5188. *See also* M.NIKOLIĆ:D2081,p.8; P4943.

³⁰⁵⁷ D.KIJAC:D4143,paras.29-31. *See also* D4147,p.3.

³⁰⁵⁸ D.KIJAC:T.44328.

³⁰⁵⁹ D.KIJAC:T.44334,44336; M.NIKOLIĆ:T.24627-24629. M.KATANIĆ saw DB operative GLOGOVAC in Bratunac between 12-14 July. M.KATANIĆ:P4374,para.95;

L.BOROVIĆANIN:T.39456. *See also* D.KIJAC:T.44329,44350.

³⁰⁶⁰ P2986; P841. The UNMOs were by then based in Potočari. J.KINGORI:P4140,paras.113,116. *See also* P4936.

³⁰⁶¹ P4388.

³⁰⁶² P4389; P4388,p.2; P4960,p.2; Lj.BOROVIĆANIN:T.39456; D.KIJAC:T.44332-44333. KIJAC did not deny the presence of one, possibly two, DB operatives in Potočari but claimed that as far as he knew, they did not conduct any interviews with Muslim men there. D.KIJAC:T.44332-44334.

³⁰⁶³ P5088,p.2.

³⁰⁶⁴ P4960,p.2; Lj.BOROVIĆANIN:T.39456. *See also* P2987,p.2.

³⁰⁶⁵ P5091,p.1.

³⁰⁶⁶ P4981. At this time, KIJAC testified he was no longer in Pale, returning only on the evening of 18 July. D.KIJAC:D4143,para.52. *See also* M.KARIŠIĆ:T.40635-40636; R.BUTLER:T.27895-27896.

³⁰⁶⁷ P4981. *See also* P5094; P5095; P4960,p.2; Lj.BOROVIĆANIN:T.39456.

³⁰⁶⁸ D4152,p.1; P5089; P6538,p.3; D4156,p.4; D4155,pp.4-5.

³⁰⁶⁹ P5557,p.4; D4156,p.7; D.KIJAC:T.44325; P4389.

(a) DERONJIĆ and municipal authorities

838. **KARADŽIĆ** issued orders to RS municipal authorities, including in the Zvornik and Bratunac areas, which were followed.³⁰⁷⁰ His subordinate,³⁰⁷¹ Miroslav DERONJIĆ,³⁰⁷² whose roles had included SDS President in Bratunac,³⁰⁷³ President of the SDS Bratunac Municipal Board,³⁰⁷⁴ President of the Bratunac CS,³⁰⁷⁵ SDS deputy President for the Birač region,³⁰⁷⁶ was appointed by **KARADŽIĆ** on 11 July to the position of Civilian Commissioner for Srebrenica.³⁰⁷⁷

839. DERONJIĆ had authority and control over the civilian authorities in the Bratunac and Srebrenica areas in July 1995, as a result of his relationship with **KARADŽIĆ**,³⁰⁷⁸ his previous position of influence in Bratunac,³⁰⁷⁹ and his 11 July appointment to the position of Civilian Commissioner for Srebrenica following which DERONJIĆ became "responsible" to **KARADŽIĆ**, and local Serb civilian leadership was "directly responsible" to DERONJIĆ.³⁰⁸⁰ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **KARADŽIĆ** appointed DERONJIĆ on 14 July as President of the War Presidency of Srebrenica-Skelani Municipality.³⁰⁸³

(b) MOD and Civilian Protection

840. **KARADŽIĆ** issued direct orders to the MOD,³⁰⁸⁴ and commanded the Civilian Protection at the Republican level through the chief or commander in charge

³⁰⁷⁰ P2248; P5212; P5215; P4553; P5143.

³⁰⁷¹ M.KATANIĆ:T.24466.

³⁰⁷² DERONJIĆ was convicted on 30 March 2004 of Persecution (a Crime Against Humanity) following a guilty plea for the mass killing of Muslim men in Glogova, Bratunac on 9 May 1992.

³⁰⁷³ M.KATANIĆ:P4374,para.13; M.KATANIĆ:T.24463; P3197,pp.4-5.

³⁰⁷⁴ M.KATANIĆ:P4374,para.12; P3197,pp.1-2; P2598; P2597; P4378; J.NIKOLIĆ:D3126,para.29.

³⁰⁷⁵ A.TEŠIĆ:D3118,para.20. *See also* M.KATANIĆ:T.24463; P3197,pp.1-3.

³⁰⁷⁶ D.KATANIĆ:T.38657.

³⁰⁷⁷ D2055; M.KATANIĆ:P4374,para.59.

³⁰⁷⁸ *See e.g.* P4966,p.2; P4967; R.BUTLER:T.27616.

³⁰⁷⁹ [REDACTED]

³⁰⁸⁰ M.KATANIĆ:P4374,para.59; M.KATANIĆ:T.24465.

³⁰⁸¹ [REDACTED]

³⁰⁸² [REDACTED]; [REDACTED] *See also*

J.NIKOLIĆ:T.35520.

³⁰⁸³ *See* V.G.2.(o): 14 July, **KARADŽIĆ** declared a State of War in Srebrenica-Skelani.

³⁰⁸⁴ P5212.

of Civilian Protection.³⁰⁸⁵ Civilian Protection was not subordinate to the VRS,³⁰⁸⁶ [REDACTED]
 [REDACTED] The Civilian Protection Staff in Bratunac was
 subordinate to a Regional Staff in Zvornik and a Republican-level staff in Pale.³⁰⁸⁸

841. [REDACTED]
 [REDACTED] *Asanacija* or
 "sanitisation" meant, in relation to the battlefield, removing bodies and burying
 them.³⁰⁹⁰ Within the context of the Srebrenica events, *asanacija* meant burying and
 re-burying the executed Muslim men.³⁰⁹¹

842. DERONJIĆ, with other civilian officials, including [REDACTED]
 [REDACTED]
 [REDACTED] Srbislav DAVIDOVIĆ (President of the Bratunac Municipal Executive
 Board³⁰⁹⁴ [REDACTED] [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

³⁰⁸⁵ M.MILOVANOVIC:T.25444-25445.

³⁰⁸⁶ A.TEŠIĆ:T.35301-35302; [REDACTED]

³⁰⁸⁷ [REDACTED]

³⁰⁸⁸ A.TEŠIĆ:T.35302; [REDACTED]

³⁰⁸⁹ [REDACTED] A.TEŠIĆ:T.35299-35302.

³⁰⁹⁰ KDZ107:P345,pp.156-157.

³⁰⁹¹ R.BUTLER:T.27850; M.NIKOLIĆ:T.24688.

³⁰⁹² [REDACTED]

³⁰⁹³ [REDACTED]

³⁰⁹⁴ S.DAVIDOVIĆ:P4100,p.5; A.TEŠIĆ:D3118,para.33.

³⁰⁹⁵ [REDACTED]

³⁰⁹⁶ [REDACTED] A.TEŠIĆ:T.35302; [REDACTED]

³⁰⁹⁷ [REDACTED];

KDZ107:P345,pp.22-23.

D. Reporting Chain to KARADŽIĆ

1. Functioning reporting chain

843. During the Srebrenica events, there was a functioning chain of reporting both within and between the VRS and RS MUP (including DB) structures as demonstrated by the frequency and nature of written reporting.

844. The VRS and RS MUP (including the DB) all reported on the movement of the column of Muslim men in the Bratunac and Zvornik areas,³⁰⁹⁸ the capture or surrender of large numbers of Muslim men,³⁰⁹⁹ their detention³¹⁰⁰ and killing.³¹⁰¹ For example:

- KRSTIĆ reported on 13 July to the VRS-GŠ the surrender of Muslim men "in great numbers", and described "reception of Muslim civilians and soldiers who surrender" in Konjević Polje and Nova Kasaba.³¹⁰²
- KIJAC reported on 13 July to KOVAČ and KARIŠIK the capture of a "large number" ("over 300") prisoners in ambushes set up in the Konjević Polje area,³¹⁰³ and on 15 July that "a group of about 100 captured Muslims from Srebrenica managed to escape from Gornja Pilica, Zvornik municipality."³¹⁰⁴ This must have been a reference to the detention of Muslim men in the Pilica area.

³⁰⁹⁸ See e.g. MUP: P5136; P5137; P5191,p.2; P5138; P5088. VRS: P6432; P5112; P4460,p.3; P5117; D2101,p.4; P5132,p.4; P5193,p.3; P5195,p.4; P5194,pp.4-5; P5196,p.4; P5436,p.6; D2108,pp.5-6; DB: P2986; P5091,p.1; P4943; D4152,p.1; P4389; P5093,p.1; P5092; D2058; P4981; P5094,p.1; P5095.

³⁰⁹⁹ P4937; P5102; P4577; P4388; P4939,p.1; P4578; P3054,p.4; D1970,p.1; P2987, p.2; P4389; P4464,p.3; P247,p.1; P4943; P4949; P4457,p.3. During the sweep operations from 17 July 1996:P5188. P4965.

³¹⁰⁰ D1970,p.1; P4981; P5188.

³¹⁰¹ VASIĆ reported on 12 July about 8,000 men (of whom 1,500 were armed) in the Konjević Polje and Sandići sector. MUP forces were "blocking this sector with the goal of destroying these forces". P4937. VASIĆ reported on 13 July about the "[k]illing of about 8,000 Muslim soldiers whom we blocked in the woods near Konjević Polje", and about MUP efforts to seal off and destroy a "large number of enemy soldiers". P4942; P6189; R.BUTLER:T.27540-27542; P2987,p.2; P247; P5152; P4965.

³¹⁰² D1970,p.1.

³¹⁰³ P4389,p.1.

³¹⁰⁴ P4981. See also M.KARIŠIK:T.40635-40636; R.BUTLER:T.27895-27896.

- VASIĆ reported on 14 July to Pale (Office of the Minister) and Bijeljina (Police Forces Command Headquarters) the surrender of a "large number of enemy soldiers".³¹⁰⁵
- On the night of 13 July, BOROVIČANIN reported to the Police Forces Command Staff in Pale that his units had "captured, or had surrender to us, around 1,500 Muslim soldiers", and that the number was increasing "by the hour." The number of Muslim soldiers who did not manage to "break through" was on the rise and was "approximately between 5,000 and 6,000".³¹⁰⁶
- KUŠIĆ reported to the DK Command on 8 August about the execution of Muslim men.³¹⁰⁷ KARADŽIĆ later expressed, in relation to his regret that 9,000 "Turks" escaped through the corridor opened by PANDUREVIĆ, that it would have been preferable to "hav[e] Rajko KUŠIĆ deal with it or perhaps General KRSTIĆ who had proven to be very good."³¹⁰⁸

845. The RS MUP, DB and VRS security and intelligence organs cooperated in the sharing of information.³¹⁰⁹ On 12 July, MUP, DB and VRS security and intelligence organs reported increasingly accurate information on the movement of the column of Muslim men from Jagličići and Šušnjari in the direction of Konjević Polje and Cerska,³¹¹⁰ and demonstrated a high degree of coordination in sharing this information,³¹¹¹ both on the ground³¹¹² and between the highest levels of the MUP, DB and VRS OBP.³¹¹³ On 12 and 13 July, effective communication between the MUP, DB and VRS concerning the movement of the column of Muslim men in the

³¹⁰⁵ P4949.

³¹⁰⁶ P2987,p.2.

³¹⁰⁷ P5109. A group of Bosnian Muslims and one "Ustasha" were "liquidated" in circumstances where the only inference must be that they were arrested/captured and questioned, then killed.

³¹⁰⁸ P1412,p.17.

³¹⁰⁹ On 6 July, for example, RADOVIĆ, Chief of the Bijeljina CRDB, reported to the DB in Pale on Srebrenica events, copying and verbally informing the VRS OB/Security Department. P4927,p.1; R.BUTLER:T.27472-27474. The content of this communication was also forwarded "personally" to KOVAČ:P4928,p.1. *See also* D.KIJAC:T.44321-44322,44365.

³¹¹⁰ In contrast, in the morning hours the VRS and MUP did not know where the column was. *See* P2996; P4935,p.2; P5102; P4577; P4388.

³¹¹¹ *See e.g.* the similar content of reports from (a) KIJAC, (b) VASIĆ and (c) Cpt. PEĆANAC (VRS-GŠ security officer) to GOLIĆ (KOSORIĆ's deputy in the DK). P4939; P4937; P5114. *See also* P5102; P4920,p.1; S.KOSORIĆ:T.38717; P4920,p.2; R.BUTLER:P4914,para.2.5.

³¹¹² P4388,p.2; P4960,p.2.

³¹¹³ *See e.g.* P5103,p.2.

Bratunac area³¹¹⁴ underpinned the deployment of MUP and VRS units to ambush, capture and kill them. For instance, BOROVIČANIN deployed men along the Kravica to Konjević Polje road to intercept the column, based on information provided by DB operatives at Potočari on 12 July.³¹¹⁵

846. This level of cooperation continued throughout the Srebrenica events,³¹¹⁶ and during subsequent efforts to cover up and repress the investigation of crimes. For instance, during the sweep operations in late July 1995, the DB provided information on the movement of Muslim men to MUP units "so that they can be promptly discovered and destroyed."³¹¹⁷ The DB coordinated **KARADŽIĆ**'s security arrangements with the VRS security organs during his visit to Srebrenica in August 1995,³¹¹⁸ and coordinated with the VRS-GŠ Security Administration on the arrest of ROHDE.³¹¹⁹

847. VRS and MUP written reports during the Srebrenica events generally avoided explicit references to the organised killing operations,³¹²⁰ but there were notable exceptions, including: (a) on 12 July, POPOVIĆ reported to the VRS-GŠ Security Administration, and DK Security Department on the separations of Muslim men aged 17-60 years in Potočari;³¹²¹ (b) on 14 July, SIMANIĆ reported on the arrest and killing of "[a]bout 1,000 to 1,500 enemy civilians and soldiers" in the Pobude Brdo and Konjević Polje areas;³¹²² (c) on 15 July, PANDUREVIĆ reported on the "additional burden" for the Zvornik Brigade of a "large number of prisoners distributed throughout schools in the brigade area";³¹²³ and (d) on 18 July, PANDUREVIĆ reported to the DK command his irritation that thousands of "Turks"

³¹¹⁴ See e.g. a) 12 July: P5103,p.2; P4960,p.2. b) 13 July: P5145; P4944; P2989. KOVAČ forwarded the content of both reports on to VASIĆ. P2988 (forwarding the content of P5145); P5098 (forwarding the content of P4944). KARIŠIK also received and sent on some of the content of P4943 to VASIĆ on 13 July. P5099. See also R.BUTLER:T.27546-27547.

³¹¹⁵ P4960,p.2; P2987; L.BOROVČANIN:T.39456.

³¹¹⁶ P4960,p.2; L.BOROVČANIN:T.39456; P4974. See also P2986; P4939,p.1; P5091,p.1; P4943; D4152,p.1; P4389; P5093,p.1; P5092; D2058; P4981; P5094,p.1; P5095.

³¹¹⁷ P5088,p.2.

³¹¹⁸ P2784; P2844.

³¹¹⁹ P5227; P6539. See also P6423. See V.G.3(g):October 1995, ROHDE arrested.

³¹²⁰ [REDACTED]

³¹²¹ P4388,p.2.

³¹²² P247. See also M.SIMANIĆ:P355,pp.21,48,81.

³¹²³ P138,p.1; R.BUTLER:P4914,para.7.72; R.BUTLER:T.27839-27840.

from Srebrenica had been detained in Zvornik, causing discontent amongst the locals, and risking Zvornik's security.³¹²⁴

2. KARADŽIĆ was kept informed

848. There was a functioning official and unofficial chain of reporting to **KARADŽIĆ** during the Srebrenica events, as demonstrated by daily written reports from the VRS-GŠ,³¹²⁵ and VRS OBP,³¹²⁶ and regular, in person and telephone contacts between **KARADŽIĆ** and individuals within the VRS, RS MUP and civilian structures.

849. **KARADŽIĆ** was kept informed via regular telephone and in person contacts with his subordinates. During the Srebrenica events, he was in regular telephone contact with the VRS-GŠ and VRS field commanders including MLADIĆ,³¹²⁷ ŽIVANOVIĆ,³¹²⁸ KRSTIĆ,³¹²⁹ TOLIMIR³¹³⁰ and GVERO,³¹³¹ and with MUP official KARIŠIK on 16 July.³¹³² He spoke by telephone with BAJAGIĆ³¹³³ on 14 July and met him late at night on 14/15 July.³¹³⁴ **KARADŽIĆ** met with RS MUP officials KOVAČ on 13, 14, 15 and 18 July,³¹³⁵ KARIŠIK on 10, 11 and 31 July,³¹³⁶ and KIJAC at least³¹³⁷ on 10, 11, 19 and 31 July.³¹³⁸ **KARADŽIĆ** spoke to DERONJIĆ

³¹²⁴ P181, pp.2-3.

³¹²⁵ See e.g. D2100; P4449; P4450; P3054; P4464; P4457; P4460; D2101; D2102; P4459; P5132. See also P2989.

³¹²⁶ See daily reports from the VRS OBP to **KARADŽIĆ**, the DB and MOD between 11-17 July 1995. These reports bear the notation "12/45". P2989, pp.4,6,10,12-14,16-18 (communication numbers 2251,2265,2298,2320,2334,2351,2365); C.NIELSEN:T.16324-16328; R.BUTLER:T.27612-27613. These reports have never been found in any archive. C.NIELSEN:T.16328; R.BUTLER:T.27612-27613. The evidence shows that they were removed on **KARADŽIĆ**'s instruction.

See V.G.(6):**KARADŽIĆ** obstructed ICTY investigations. Other reports notated "12/45" were signed by SALAPURA and TOLIMIR. D3721; D3722; P6408; P6411; P4463; P5226 (all except one are headed VRS-GŠ OBP. P6411 is headed VRS-GŠ Intelligence Administration).

³¹²⁷ T.PREMOVIĆ:P4911, pp.61-63; T.PREMOVIĆ:T.27406,27414-27415,27417-27419; S.RISTIĆ:P4556, pp.26-27,34-41,43-47,50; S.RISTIĆ:T.26071-26076,26088.

³¹²⁸ P4484.

³¹²⁹ T.KOVAČ:D3960, paras.110,129.

³¹³⁰ P2276; Z.TOLIMIR:T.45063.

³¹³¹ P4629; P4630.

³¹³² See V.G.2(r):16 July, **KARADŽIĆ** briefed by KARIŠIK.

³¹³³ BAJAGIĆ "was on excellent terms both personally with Dr. Radovan Karadzic and the other members of the leadership in Pale". M.ŽIVANOVIĆ:T.42655. See also Z.BAJAGIĆ:D3853, para.9; T.41152.

³¹³⁴ P2242, p.91. See also T.KOVAČ:T.42803-42805.

³¹³⁵ P2242, pp.91-93.

³¹³⁶ P2242, pp.89-90,100.

³¹³⁷ D.KIJAC:T.44320-44321.

regularly by telephone,³¹³⁹ including on 12³¹⁴⁰ and 13³¹⁴¹ July, and met him on 14 July.³¹⁴² **KARADŽIĆ** both initiated,³¹⁴³ and received telephone calls from the field to his Pale office directly.³¹⁴⁴ In a transparent effort to distance himself from Srebrenica responsibility, KOVAČ nevertheless underscored **KARADŽIĆ**'s multiple sources of information to explain why he allegedly did not speak to **KARADŽIĆ** about Srebrenica in his multiple discussions during that time, insisting that one of the many others who were reporting to **KARADŽIĆ**, such as the DB,³¹⁴⁵ the VRS-GŠ,³¹⁴⁶ KRSTIĆ,³¹⁴⁷ DERONJIĆ,³¹⁴⁸ and also BAJAGIĆ,³¹⁴⁹ would have informed him.

850. **KARADŽIĆ** issued orders and instructions related to the forcible removal and killing operations in writing, by telephone and in person.³¹⁵⁰ He also received reports related to the forcible removal and killing operations through his telephone contacts and meetings with VRS commanders, MUP officials and DERONJIĆ. For example, first, on 13 July, **KARADŽIĆ** sent KOVAČ to the field where he met with MLADIĆ and then went to Hotel Vidikovac in the Zvornik area, to where the prisoners were bound. Given the timing, the route and the participants, this mission was unmistakably about the transfer of the prisoners to where they would be killed.³¹⁵¹ KOVAČ reported back late at night on 14 July.³¹⁵² Second, **KARADŽIĆ** received a report from MLADIĆ on 13 July by telephone that the forcible removal operation was complete.³¹⁵³ Third, in a telephone conversation with DERONJIĆ on 13 July, **KARADŽIĆ** gave orders to ensure that the Muslim prisoners then in Bratunac would

³¹³⁸ P2242,pp.89-90,94,100; D.KIJAC:D4143,para.54; D.KIJAC:T.44320-44321. *See also* T.KOVAČ:D3960,paras.110,129; T.KOVAČ:T.42804-42805.

³¹³⁹ M.KATANIĆ:P4374,para.70; P6692. *See also* T.KOVAČ:D3960,paras.110,129; T.KOVAČ:T.42804-42805.

³¹⁴⁰ *See* V.G.1(h):11 July, **KARADŽIĆ** issued two Decisions/Orders.

³¹⁴¹ *See* V.G.2(i):13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

³¹⁴² P2242,p.91; P4382,p.2; R.DURĐEVIĆ:P4513,pp.24-26.

³¹⁴³ S.RISTIĆ:P4556,pp.34-35; S.RISTIĆ:T.26072.

³¹⁴⁴ *See e.g.* V.G.2(q):14 July, **KARADŽIĆ** briefed from the field.

³¹⁴⁵ T.KOVAČ:D3960,para.129;T.42804.

³¹⁴⁶ T.KOVAČ:T.42804.

³¹⁴⁷ T.KOVAČ:D3960,para.129.

³¹⁴⁸ T.KOVAČ:T.42804-42806.

³¹⁴⁹ T.KOVAČ:T.42804.

³¹⁵⁰ *See e.g.* (a) to DERONJIĆ (via an intermediary) by telephone (*see* V.G.2(i):13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik); (b) to KOVAČ in person(*see* V.G.2(g):13 July, KOVAČ met with MLADIĆ); and (c) on 14 July, in writing (*see* V.G.2(o):14 July, **KARADŽIĆ** declared a State of War in Srebrenica-Skelani).

³¹⁵¹ *See* V.G.2(g):13 July, KOVAČ met with MLADIĆ.

³¹⁵² *See* V.G.2(g):13 July, KOVAČ met with MLADIĆ.

be transported to Zvornik.³¹⁵⁴ Fourth, on 14 July, **KARADŽIĆ** received in-person briefings from **DERONJIĆ**, **KOVAČ** and **BAJAGIĆ**,³¹⁵⁵ and via a telephone call from a field commander in the Nova Kasaba/Konjević Polje area.³¹⁵⁶ These, and other meetings and telephone conversations about which the Prosecution has led direct evidence, reflect the minimum contact that **KARADŽIĆ** must have had in this period with his informants and subordinates. Not every meeting was diarised, nor every telephone conversation either diarised or intercepted by the ABiH.³¹⁵⁷

851. **KARADŽIĆ** was familiar with the detail of VRS and MUP reporting, and all aspects of the progress of events on the ground. This is evidenced in particular by his conversation with **ŽIVANOVIĆ** on 8 July when he was informed—and clearly understood the import—of the success of VRS tactics in the advance on the Srebrenica enclave,³¹⁵⁸ and, on 16 July, when he was informed by **KARIŠIĆ** that **PANDUREVIĆ** had agreed to allow the safe passage of Muslim men to ABiH-held territory, raising the issue with the VRS-GŠ.³¹⁵⁹

852. In the case of the VRS, daily written reports supplemented the direct reporting of his involved subordinates, informing **KARADŽIĆ** that on:

- 12 July, VRS and MUP units had "organised ambushes in order to destroy Muslim extremists who have not surrendered",³¹⁶⁰
- 13 July, Muslim men surrendered in "large numbers",³¹⁶¹

³¹⁵³ See V.G.2(h):13 July, **MLADIĆ** reported to **KARADŽIĆ** that Srebrenica was done.

³¹⁵⁴ See V.G.2(i):13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

³¹⁵⁵ See V.G.2(n):MUP officials kept **KARADŽIĆ** informed of events in the Zvornik area; V.G.2(q):14 July, **KARADŽIĆ** briefed from the field.

³¹⁵⁶ See V.G.2(q):14 July, **KARADŽIĆ** briefed from the field.

³¹⁵⁷ See e.g. **KARADŽIĆ**'s call with **ŽIVANOVIĆ** on 8 July, not intercepted by the ABiH but otherwise recorded (see V.F.2(b):8 July, **KARADŽIĆ** ordered **KRSTIĆ** to "go forcefully ahead"); and **KARADŽIĆ**'s calls with **DERONJIĆ** on 12 July (see V.G.1(h):11 July, **KARADŽIĆ** issued two Decisions/Orders), with **MLADIĆ** on 13 July (see V.G.2(h):13 July, **MLADIĆ** reported to **KARADŽIĆ** that Srebrenica was done), and with a field commander on 14 July (see V.G.2(q):14 July, **KARADŽIĆ** briefed from the field), all of which were witnessed, but not diarised or intercepted.

³¹⁵⁸ See V.F.2(a):6-8 July, Attack on Srebrenica enclave; V.F.2(b):8 July, **KARADŽIĆ** ordered **KRSTIĆ** to "go forcefully ahead".

³¹⁵⁹ See V.G.2(r):16 July, **KARADŽIĆ** briefed by **KARIŠIĆ**.

³¹⁶⁰ P3054,pp.3-4. See also P2989,p.10, line 2297.

³¹⁶¹ P4464,p.3. Situation Report 03/3-194 is not recorded in P2989, RS State Centre for Encrypted Communications logbook.

- 14 July, DK units were "scouring the terrain" and taking a "large number of Muslim fugitives" prisoner,³¹⁶²
- 15 July, prisoners surrendered,³¹⁶³ and that there were ongoing efforts around 16 July to search the terrain for "remaining enemy groups",³¹⁶⁴ continuing into late July and early August.³¹⁶⁵

853. The VRS-GŠ OBP also reported to **KARADŽIĆ** daily from 11 to 17 July 1995.³¹⁶⁶

854. KIJAC testified that he knew about Muslim prisoners after the fall of Srebrenica,³¹⁶⁷ and that he was keeping the President informed of the figures "stated in our documents".³¹⁶⁸ KIJAC also reported to **KARADŽIĆ** directly in writing.³¹⁶⁹

E. Goals of **KARADŽIĆ** and BSL for the Podrinje

1. 1992 to 1995

855. **KARADŽIĆ** had been for years committed to the removal of the Bosnian Muslim population from the region in and around Srebrenica as part of the Overarching JCE.³¹⁷⁰ **KARADŽIĆ** promulgated strategic objective 3, authorised criminal orders such as Directive 4³¹⁷¹ and DK order 2-126,³¹⁷² authorised his subordinates' unlawful military attacks against Muslim civilians in the region in and around Srebrenica, and orchestrated an unlawful policy of restricting humanitarian aid and UNPROFOR supplies into Srebrenica.³¹⁷³

³¹⁶² P4457,p.3. *See also* P2989,p.13, line 2333.

³¹⁶³ P4460,p.3; P2989,p.15,line 2347.

³¹⁶⁴ D2101,p.4; P2989,p.17,line 2364.

³¹⁶⁵ P5132,p.4; P5193,p.3; P5195,p.4; P5194,pp.4-5; P5196,p.4; P5436,p.6; D2108,pp.5-6.

³¹⁶⁶ *See* P2989,pp.4,6,10,12-14,16-18(lines 2251,2265,2298,2320,2334,2351,2365).

³¹⁶⁷ D.KIJAC:D4143,para.53.

³¹⁶⁸ D.KIJAC:T.44349-44350.

³¹⁶⁹ P6538,p.3; D4155,p.8("507 pieces of information" were conveyed to the President in the form of consolidated daily and current reports, or as reports dedicated to specific topics).

³¹⁷⁰ *See* Podrinje Summary,para.2; III.C.8.(i).(iii).b.iv: Directive 4.

³¹⁷¹ *See* Podrinje Summary,paras.1-3.

³¹⁷² *See* Podrinje Summary,para.2.

³¹⁷³ *See* Podrinje Summary,paras.1-20.

2. Directive 7

856. In March 1995, **KARADŽIĆ** issued Directive 7,³¹⁷⁴ a criminal order intended to eliminate the Srebrenica enclave by militarily attacking the Muslim civilian population and restricting their access to humanitarian aid, as well as disabling the UNPROFOR soldiers in the enclave. This was **KARADŽIĆ**'s Directive—signed by him and for which he claimed responsibility at the time, telling Robert DJURĐEVIĆ on 14 July 1995 that the attacks on Srebrenica and Žepa were part of "My Order number 7."³¹⁷⁵

857. As **KARADŽIĆ** explained on 14 July, the BSL's strategy in relation to the enclaves was "to raise the temperature to the boiling point";³¹⁷⁶ in other words, to illegally deprive the Bosnian Muslim population of Srebrenica and Žepa of the necessities for survival and create a humanitarian disaster that would force them to leave the enclaves to survive.³¹⁷⁷

F. **KARADŽIĆ** ordered the attack on the Srebrenica enclave

1. **KARADŽIĆ** gave the order to prepare to seize the enclaves

858. On 21 May 1995, **KARADŽIĆ** told SMITH that the enclaves were "a time bomb about to explode" and that UNPROFOR should leave as they would get caught in the cross-fire.³¹⁷⁸ On 28 May, at the 16th session of the Supreme Command attended by MLADIĆ and others, **KARADŽIĆ** gave the order to "[p]repare to seize the enclaves".³¹⁷⁹ As he recalled at the 52nd RS Assembly session on 6 August 1995:

³¹⁷⁴ P838. See Podrinje Summary, paras.21-29.

³¹⁷⁵ P4515,p.12; R.ĐURĐEVIĆ:T.25906-25907,25938-25939,25959.

³¹⁷⁶ R.ĐURĐEVIĆ:T.25906-25907,25938-25939,25959; P4515,p.12. In KOLJEVIĆ's words, it was time to "up the ante". R.DJURĐEVIĆ:P4513,p.19; R.ĐURĐEVIĆ:T.25907-25908,25910-25911; P4515,pp.7 (KOLJEVIĆ),13 (KRAJIŠNIK). There is no reason to doubt the accuracy of ĐURĐEVIĆ's recollection of what **KARADŽIĆ** said to him at this meeting. ĐURĐEVIĆ was an honest and reliable witness, who recorded the content of this meeting contemporaneously. P4515,p.9; R.ĐURĐEVIĆ:T.25898,25903-25904; P4513,pp.9-12,34-35; P4514. His evidence was all the more compelling because he had never read Directive 7. R.ĐURĐEVIĆ:T.25959.

³¹⁷⁷ Once Žepa fell and the Bosnian Muslim population were removed, Srebrenica and Žepa were "finished". P5645,p.3. See also P5193,p.3; P5142.

³¹⁷⁸ P2266,p.2; R.SMITH:T.11363-11364.

³¹⁷⁹ P1473,p.148. See P2242,p.68.

the Supreme Command /meetings/ have all been recorded and everything is there, both in verbal and in written form I ordered to push ahead to Žepa and Srebrenica.³¹⁸⁰

859. Any successful attack on the Srebrenica enclave required access through Zeleni Jadar—the site of the UN checkpoint known as "OP Echo"—to control road communications.³¹⁸¹ On the day after **KARADŽIĆ** ordered the VRS to prepare to seize the enclaves, the DK command issued an order to take control of the Zeleni Jadar area.³¹⁸² This was a prelude to the attack on the enclave—preparation for their seizure³¹⁸³—as ŽIVANOVIĆ confirmed in his victory speech after the fall of Srebrenica: "at the end of May, we started to carry out preparations and then took Zeleni Jadar and tested what the expulsion of UNPROFOR with weapons looks like."³¹⁸⁴

860. On 2 June, ŽIVANOVIĆ issued an order for the removal of the UN checkpoint at Zeleni Jadar and outlined the steps for doing so.³¹⁸⁵ On 3 June, the VRS attacked OP Echo and DutchBat soldiers withdrew under FRANKEN's orders.³¹⁸⁶ VASIĆ visited the area in mid-June and reported to KOVAČ that a MUP checkpoint had been established near the factories. He noted that full and unhindered access to the plant equipment in the factories had not been achieved because the army had failed to do what had been "agreed with President KARADŽIĆ".³¹⁸⁷

³¹⁸⁰ P1412,p.75.

³¹⁸¹ R.FRANKEN:P4175,paras.43-44; E.RAVE:P3995,paras.23-24; J.KINGORI:P4140,paras.59-60; R.BUTLER:T.27477-27480; P4929. *See also* P4941,p.26; P4481,p.3. The *Krivaja-95* attack order included an attack along the Zeleni-Jadar-Srebrenica Axis. P4481,pp.3-4; P5133,p.2.

³¹⁸² P5219.

³¹⁸³ R.FRANKEN:P4175,para.44; R.FRANKEN:T.23078-23079; P1473,p.148. *See also* J.KINGORI:P4140,paras.59-60.

³¹⁸⁴ P4201,V000-9035,00:35:40-00:36:08; P4202,pp.83-85,256. *See also* ŽIVANOVIĆ's statement to UNPROFOR in January 1995: "UNPROFOR owes Jadar personally to me". P3996,p.2; E.RAVE:P3995,paras.14-15.

³¹⁸⁵ P4199; R.FRANKEN:T.23079-23080.

³¹⁸⁶ R.FRANKEN:P4175,paras.38,44; R.FRANKEN:T.23078-23079; E.RAVE:P3995,paras.25-28; P4200. *See also* P5111; P5110.

³¹⁸⁷ P5159,p.2.

2. KARADŽIĆ approved the attack on the Srebrenica enclave

861. The attack on the Srebrenica enclave implemented Directive 7 and was approved by **KARADŽIĆ**³¹⁸⁸ in late June 1995.³¹⁸⁹ In October 1995, he took credit for it:

As the Supreme Commander, I stood behind the plan for Žepa and Srebrenica, mainly for Srebrenica, Žepa was implied. [...] I personally supervised the plan without the knowledge of the GŠ, not even hiding /anything/ but I happened to run into General KRSTIĆ and advised him to go straight into town and to pronounce the fall of Srebrenica, and later we will chase the Turks around the woods. I approved an /?immediate/ task and a radical task and I don't regret it.³¹⁹⁰

862. The *Krivaja-95* Attack Order, dated 2 July,³¹⁹¹ explicitly referred to Directives 7 and 7/1 in the most relevant portion pertaining to the objective of the operation:

The Command of the Drina Corps, *pursuant to Operations Directive no. 7 and 7/1* of the GŠ VRS /Main Staff of the Army of Republika Srpska/, and on the basis of the situation in the Corps area of responsibility, has the task of carrying out offensive activities with free forces deep in the Drina Corps zone, as soon as possible, in order to split apart the enclaves of Žepa and Srebrenica, *and to reduce them to their urban areas.*³¹⁹²

863. In relation to Srebrenica, the unlawful objective of reducing the enclave to its urban area was to force the Bosnian Muslim population into the small town of Srebrenica, thereby creating conditions in which it would be impossible for the Muslim population to sustain itself, replicating the humanitarian disaster of 1993. Thus the Attack Order also issued the task "to create conditions for the elimination of the enclaves."³¹⁹³ Whatever legitimate objectives there could have been for military

³¹⁸⁸ **KARADŽIĆ** later confirmed that KRSTIĆ planned the Srebrenica operation in front of him, and he approved it. P4555,00:00:30-00:00:47; P5121; P2565,p.4.

³¹⁸⁹ **KARADŽIĆ** met KRSTIĆ at the DK Command in Vlasenica in late June. V.POPOVIĆ:D3993,para.7; P5087,p.2; Rule 84bis Statement:T.28876. POPOVIĆ testified that either on the evening **KARADŽIĆ** met with KRSTIĆ, or the day after, KRSTIĆ called his assistants and informed them about a military operation to separate the enclaves of Srebrenica and Žepa, and reduce them to their 1993 borders. V.POPOVIĆ:D3993,para.9.

³¹⁹⁰ P1415,p.86.

³¹⁹¹ P4481,p.10. See also P4941,pp.25-27; P5126,para.6; D2094,p.4.

³¹⁹² P4481,p.3(emphases added). See also P4571,para.2 (also issued "pursuant to Operations directive no.7 and 7/1"); M.LAZIĆ:P4072,pp.11-12.

³¹⁹³ P4481,p.3.

operations in the area, they did not negate the illegal and criminal objective to forcibly drive out the civilian population.³¹⁹⁴

864. The falsity of Defence claims that the *Krivaja-95* attack was responsive to ABiH operations in the Srebrenica enclave in June, as opposed to a planned implementation of Directive 7,³¹⁹⁵ is demonstrated by VRS operations in the Spring of 1995. A May 1995 operation "to establish conditions for the liberation of the enclaves"—which had to be aborted for lack of resources—evidenced the ongoing commitment to the goals of Directive 7.³¹⁹⁶

(a) 6-8 July, Attack on Srebrenica enclave

865. On 6 July 1995, the VRS DK attacked the Srebrenica safe area.³¹⁹⁷ During the subsequent days the VRS used tanks, artillery, aerial bombs, mortars, rockets and heavy machine guns to pound the entire enclave. Srebrenica town became more and more crowded as the Muslim population fled their villages which had come under attack.³¹⁹⁸ In the course of this military operation, the VRS attacked and disabled the UNPROFOR forces tasked to protect the civilian population. The attack included deliberate firing on DutchBat OPs, positions and vehicles, and the targeting of DutchBat's Potočari compound and the area around it. DutchBat soldiers were also taken prisoner and held at Hotel Fontana in Bratunac.³¹⁹⁹

866. By the night of 8 July, KRSTIĆ reported that key installations, including the "Tri Sise" feature, had been seized in an assault on the Zeleni Jadar-Živkovo Brdo-Srebrenica axis creating "favourable conditions for an incursion into Srebrenica."³²⁰⁰ By about 11:00 on 9 July ŽIVANOVIĆ conveyed a message of congratulations and encouragement from him and MLADIĆ to the DK IKM and units under his command.³²⁰¹

³¹⁹⁴ An accused's legitimate military objective demonstrates his motive, not his intent. As the Tribunal has repeatedly held, motive is irrelevant for establishing criminal intent. *See e.g. Jelišić* AJ, para.49; *Tadić* AJ, paras.268-269.

³¹⁹⁵ R.RADINOVIĆ:T.41429,41536-41549; M.TRIVIĆ:D3747,p.15.

³¹⁹⁶ P5216; P4979; D3958,pp.1-2; P4980; P5217; P5218; D4442.

³¹⁹⁷ AF1472; R.BUTLER:P4914,p.35; J.KINGORI:P4140,paras.63-67; C.SCHMITZ:P4752,para.26.

³¹⁹⁸ *See* Srebrenica Narrative, para.5.

³¹⁹⁹ *See* Srebrenica Narrative, para.6.

³²⁰⁰ P4482,p.1.

³²⁰¹ P5104,p.1.

(b) 8 July, KARADŽIĆ ordered KRSTIĆ to "go forcefully ahead"

867. **KARADŽIĆ** was fully engaged in the progress of the *Krivaja-95* attack and contacted VRS commanders directly to apprise himself of the situation on the ground.³²⁰² At some time on or around 8 July,³²⁰³ **KARADŽIĆ** was personally informed in a conversation with ŽIVANOVIĆ of the assault on and seizure of the "Tri Sise" elevations.³²⁰⁴ He had evidently also received a prior report that the "immediate task" had been completed.³²⁰⁵ **KARADŽIĆ** was aware of the significance of the capture of the elevations above Zeleni Jadar for the success of the operation;³²⁰⁶ and it was the first issue he raised with ŽIVANOVIĆ.³²⁰⁷

868. **KARADŽIĆ** was also well aware at this time that DutchBat soldiers had been detained by the VRS:

RK: So, what's going on? There are some *blue guys with us*, right?

MŽ: Pardon?

RK: There are some blue guys with us, right?

MŽ: Yes.

RK: They should be treated well.³²⁰⁸

869. **KARADŽIĆ** had also clearly been informed via other sources that KRSTIĆ had requested resources. He told ŽIVANOVIĆ that "we could probably reinforce you a little", but instructed ŽIVANOVIĆ to make his request via the VRS-GŠ ("Barijera")³²⁰⁹, in accordance with the VRS chain of command.³²¹⁰ KRSTIĆ had made a written request for reinforcements in an interim combat report dated 8 July

³²⁰² R.BUTLER:T.27728. In his office on 14 July, **KARADŽIĆ** had maps on the wall showing the position of VRS armed forces and circles around the enclaves, including Srebrenica. R.DURĐEVIĆ:P4513,pp.19-20. The VRS-GŠ also provided written reports to **KARADŽIĆ** every day from 5-8 July summarising the progress of the attack on the enclave. *See e.g.* D2096,p.3D2097,p.4; D2098,p.4; D2099,p.3.

³²⁰³ Given the corresponding content of numerous exhibits, the only reasonable inference is that this undated conversation took place on or around 8 July. *See* P4930,p.1; P4482,p.1; P4931; D2099,p.3. *See also* M.ŽIVANOVIĆ:D3932,p.10,para.A2.

³²⁰⁴ P4484,p.1(translated as "the tits"); M.ŽIVANOVIĆ:D3932,p.10,para.A3.

³²⁰⁵ P4484, p.1.

³²⁰⁶ R.BUTLER:T.27476-27481; P492. *See also* P4941,p.26; P4481,p.3; Lj.OBRADOVIĆ:T.25215-25216,25298-25302.

³²⁰⁷ P4484,p.1.

³²⁰⁸ P4484,p.1(emphasis added). "Blue ones" is clearly a reference to DutchBat soldiers who were identifiable by their UNPROFOR blue helmets. R.FRANKEN:T.23122;

M.ŽIVANOVIĆ:D3932,p.10,para.A4.

³²⁰⁹ This is a code name for the VRS-GŠ:P4938,p.1; R.BUTLER:T.27534-27535.

³²¹⁰ P4484,p.1.

1995,³²¹¹ and ŽIVANOVIĆ had requested that the VRS-GŠ "engage MUP forces from Zvornik (their first company) through the RS /Republika Srpska/ MUP".³²¹² **KARADŽIĆ** had been informed of this request, as evidenced by his instruction to tell "KRLE"³²¹³ that this particular unit was the last reserve for the MUP engaged on the Trnovo front.³²¹⁴

870. ŽIVANOVIĆ also informed **KARADŽIĆ** that he had told GVERO to work on what is clearly a reference to the Muslim population of Srebrenica³²¹⁵ via the Milići and Bratunac radio "actually to let them know that they are being offered to get out, to get away, so they don't get killed etc", to which **KARADŽIĆ** responded, "[a]ll right, have someone prepare instructions for the journalists and I will approve them".³²¹⁶

871. **KARADŽIĆ** concluded this conversation with an order:

RK: All right General, *full speed ahead. Tell KRSTIĆ, order to go full steam ahead.*

MŽ: We are working pretty much according to plan and it's going well, and thank God that we don't have any losses. That's the key, especially in these first attacks.³²¹⁷

872. **KARADŽIĆ** and ŽIVANOVIĆ acknowledged during the conversation that they were talking on a secure line, and emphasised the importance of ensuring future conversations between them are made using secure communications.³²¹⁸ In fact, their conversation was recorded and later found on a tape seized from MLADIĆ's house.³²¹⁹ This suggests that there were other oral communications between **KARADŽIĆ** and his commanders during and after the takeover of Srebrenica that were not intercepted by the ABiH.

³²¹¹ P4482,p.2.

³²¹² P4930,p.2; R.BUTLER:T.27486-27487.

³²¹³ An abbreviation for KRSTIĆ. R.BUTLER:T.27765.

³²¹⁴ P4484,p.2; M.ŽIVANOVIĆ:D3932,para.A5.

³²¹⁵ P4931.

³²¹⁶ P4484. *See also*, in 1993, ŽIVANOVIĆ's use of Radio Zvornik to tell Muslims that they could leave Cerska and Kamenica "unhindered" and that "[n]o repressive measures" would be used against them. P5499,p.2.

³²¹⁷ P4484,p.2(emphasis added).

³²¹⁸ P4484,p.2.

³²¹⁹ T.BLASZCYK:T.27367-27368.

(c) 9 July, VRS-GŠ deceived UNPROFOR

873. On 9 July the VRS-GŠ lied to UNPROFOR to delay the decision-making process regarding the employment of NATO close air support, which—as all the parties in the conflict understood—was UNPROFOR's primary means of repelling a VRS attack on the safe area. These lies and deception were instrumental to the success of the VRS action to takeover the enclave and remove the civilian population.

874. On the evening of 9 July, NICOLAI expressed to TOLIMIR deep concern about the attack on the enclave, and requested an explanation for the VRS's actions. NICOLAI demanded that the VRS withdraw and stated that UNPROFOR would defend the safe area against the VRS attack with all available means. TOLIMIR sought to obstruct UNPROFOR's attempt to stop the assault by promising he would check NICOLAI's information directly on the ground and denying that there was any conflict between the VRS and UNPROFOR or the Srebrenica civilian population.³²²⁰ UNPROFOR issued a written warning that was sent to MLADIĆ and released as a press statement.³²²¹

875. TOLIMIR sent an urgent communication asking KRSTIĆ to send a situation report every hour so that he could communicate with UNPROFOR, "which will enable you to continue to work according to plan."³²²² The plan was to continue the attack on the enclave and intimidate and neutralise UNPROFOR without causing significant UNPROFOR casualties.

³²²⁰ P5128; P5229; P4788; P5131; P4821; P5127. *See also* P5266,pp.1-2; P.BOERING:P3969,pp.55-57.

³²²¹ P2275. *See also* P4820. Later that night, TOLIMIR confirmed to JANVIER he had received the UNPROFOR warning. P5266,pp.1,3.

³²²² P5131.

G. Formation, implementation and cover-up of the JCE to eliminate

1. Formation and initial stages in the implementation of the JCE to Eliminate

(a) 9 July, KARADŽIĆ ordered the final attack and takeover of Srebrenica

876. On 9 July 1995, **KARADŽIĆ** ordered the VRS to attack Srebrenica town.³²²³ This order implemented Directive 7 and was a final step towards eliminating the Srebrenica enclave and removing its inhabitants.³²²⁴

877. On the night of 9 July, **KRSTIĆ** reported to the VRS-GŠ that the DK's objectives for Srebrenica under the *Krivaja-95* attack order had been achieved:³²²⁵ the enclaves of Žepa and Srebrenica were separated and the Srebrenica enclave reduced to its urban area; conditions were thereby created to eliminate the enclave.³²²⁶ By this time, the VRS were one kilometre short of the town.³²²⁷

878. At about 23:20, **KRSTIĆ** proposed a new attack order, which **KARADŽIĆ** approved.³²²⁸ Shortly before midnight, **TOLIMIR**, the senior officer at the VRS-GŠ command post,³²²⁹ passed down **KARADŽIĆ**'s order ("the 9 July attack order"):

The President of the Republic [...] has agreed with the continuation of operations for the takeover of Srebrenica, disarming of Muslim terrorist gangs and complete demilitarisation of the Srebrenica enclave.³²³⁰

879. The order further stated that "full protection be ensured to UNPROFOR members and the Muslim civilian population", directing that orders be issued to VRS

³²²³ P2276. **KARADŽIĆ** has conceded on the record that he gave approval to enter Srebrenica. Rule 84bis Statement:T.28877. See also M.NIKOLIĆ:T.24834; Lj.OBRADOVIĆ:T.25223; R.BUTLER:T.27725-27726.

³²²⁴ See P838,p.10; P4481,p.3.

³²²⁵ P4481,p.3.

³²²⁶ D2080,p.1. See also P4481,p.3; R.BUTLER:T.27490; P4150,p.1.

³²²⁷ AF1483; P5131; P5229; P4788; P5128.

³²²⁸ D2080,p.1.

³²²⁹ R.BUTLER:T.27492-27493.

³²³⁰ P2276. See also J.KINGORI:T.22958-22960. The short time-frame within which these two communications were received indicates that **KRSTIĆ** had at least verbally briefed **ŽIVANOVIĆ** and the VRS-GŠ about the military situation so that even before they received his interim report in writing, they were able to brief **KARADŽIĆ** and receive his orders for the next objective. R.BUTLER:T.27491-27492. See also Z.TOLIMIR:T.45063.

combat units to "offer maximum protection and safety" to UNPROFOR and the civilian population, and "treat the civilian population and war prisoners in accordance with the Geneva Conventions".³²³¹ These aspects of the order were meaningless, as the evidence shows, and part of repeated efforts to cloak written orders implementing illegal objectives with simulated adherence to international law.

880. Within four days after **KARADŽIĆ** issued his 9 July attack order, the Bosnian Muslim population of Srebrenica had been forcibly removed from the enclave.³²³²

881. On 10 July there was "massive" shelling of Srebrenica, including the DutchBat compound there.³²³³ DutchBat blocking positions were also under fire. Thousands of refugees from the surrounding area had gathered around the UN base in Srebrenica town and at the UNPROFOR headquarters in Potočari. The heavy shelling continued throughout the day, resulting in civilian casualties.³²³⁴

(b) VRS-GŠ continue to disable and deceive UNPROFOR

882. On 10 July, the VRS and DutchBat exchanged ultimata. The UN threatened the VRS with massive air strikes, while the VRS issued ultimata which included a demand that DutchBat and the population should leave the enclave.³²³⁵ The same day, MLADIĆ wrote to SMITH claiming falsely that "[o]ur activities are by no means directed against civilians or the UNPROFOR members".³²³⁶ TOLIMIR also falsely denied to JANVIER that the VRS was attacking DutchBat soldiers.³²³⁷ GVERO issued a false statement claiming that VRS actions were "directed towards simply neutralising the Muslim terrorists, and are in no way directed against civilians or members of UNPROFOR." He stated that "[t]he civilians from Srebrenica who wish to do so can in an organised and safe manner leave the settlement".³²³⁸

³²³¹ P2276. *See also* P5221.

³²³² *See* Srebrenica Narrative, paras. 7-18, 24, 28.

³²³³ AF1484-AF1485; R.FRANKEN:P4175, para. 55; P.BOERING:P3969, pp. 64-65; P.BOERING:T.22138-22140, 22150-22151; P3991; J.RUTTEN:P3948, paras. 18-20; P4151; P4152; J.KINGORI:P4140, paras. 116-118; E.RAVE:P3995, paras. 44-45, 47.

³²³⁴ *See* Srebrenica Narrative, para. 8.

³²³⁵ P4154, pp. 2-3; P4176. *See also* R.FRANKEN:P4175, para. 56.

³²³⁶ D1038; R.SMITH:T.11691-11692.

³²³⁷ P5270, p. 1; P4836, p. 1. *See also* P5268.

³²³⁸ D2013, p. 2.

883. KARREMANS sent urgent requests for NATO air support to defend Srebrenica, but no assistance was forthcoming until around 14:30 on 11 July, when NATO bombed VRS tanks advancing towards the town.³²³⁹ NATO planes also attempted to bomb VRS artillery positions overlooking the town, but had to abort the operation due to poor visibility.³²⁴⁰

(c) 10 July, KARADŽIĆ deployed RS MUP forces to Srebrenica area

884. At some time before 14:50³²⁴¹ on 10 July, "[a]s a result of the newly arisen situation around the Srebrenica enclave",³²⁴² MLADIĆ issued an order to the DK command to plan and launch an offensive around the Žepa enclave.³²⁴³ It was apparent by this time that the ABiH were in "disarray",³²⁴⁴ and the attack on Srebrenica was a "success".³²⁴⁵

885. KARADŽIĆ ordered the deployment of RS MUP forces to the area, as is evidenced by KOVAČ's order of the same date ("KOVAČ's 10 July order"),³²⁴⁶ in which BOROVCANIN was appointed commander of a new "independent unit" and ordered to report to KRSTIĆ on the following day.³²⁴⁷

886. KARADŽIĆ deployed MUP forces to Srebrenica to participate in the longstanding objective of forcibly removing the Bosnian Muslim population, as had been his aim in ordering the takeover of the enclave on 9 July.³²⁴⁸ Over the

³²³⁹ AF1495; R.FRANKEN:P4175,para.65; R.BUTLER:P4914,p.37; V.EGBERS:P331,pp.12,154; J.KINGORI:P4140,paras.128,130; E.RAVE:P3995,paras.52,57.

³²⁴⁰ AF1496; R.BUTLER:P4914,p.37.

³²⁴¹ P5106,p.2.

³²⁴² P5106,p.1.

³²⁴³ P5106,pp.1-2.

³²⁴⁴ P2985.

³²⁴⁵ P5106,p.1.

³²⁴⁶ P2992/P2993(duplicates)(B/C/S). P2993 includes a version of KOVAČ's order signed "for" (B/C/S "za") KOVAČ by R.NIKOLIĆ. P2993,p.2(BCS). The other versions of this order are type-signed by KOVAČ. P2992; P2993,p.1(BCS). R.NIKOLIĆ must be Radomir NIKOLIĆ, a member of the MUP Police Forces Command Staff. P2981,p.2(point 6); C.NIELSEN:T.16335-16336. *See also* C.NIELSEN:T.16337.

³²⁴⁷ P2992/P2993(duplicates); L.BOROVCANIN:D3659,para.15. *See also* M.ĐURIĆ(KW118):D3903,para.6.

³²⁴⁸ P2996. KOVAČ and KARIŠIK were both at pains to distance themselves from KOVAČ's 10 July order, motivated by their interest in disassociating themselves from KARADŽIĆ's criminal aim in ordering the deployment of a MUP unit to Srebrenica. KARIŠIK testified that although he met KARADŽIĆ on the afternoon of 10 July with KIJAC (P2242,p.89), he did not know about the 10 July order (M.KARIŠIK:T.40605-40606) or that BOROVCANIN was sent to Srebrenica from the Sarajevo front (M.KARIŠIK:T.40609). KARIŠIK assumed he did not discuss Srebrenica with KARADŽIĆ

subsequent days, MUP forces under BOROVIČANIN's command took control of Potočari,³²⁴⁹ participated in the separations of Muslim men in Potočari,³²⁵⁰ and captured thousands along the Bratunac-Konjević Polje road.³²⁵¹ On 13 July, men under BOROVIČANIN's command killed over 1,000 men at Kravica Warehouse and at Sandići Meadow.³²⁵²

(d) 11 July, GVERO reported to KARADŽIĆ

887. At 16:15 on 11 July, GVERO spoke to NICOLAI, threatening that if he did not halt NATO air support he would be held responsible for "the destiny of his men and the civil population in SREBRENICA."³²⁵³ He repeated the lie that the VRS was not attacking UNPROFOR, but that UNPROFOR soldiers had been forced by the ABiH to send such reports.³²⁵⁴

888. At 16:23, GVERO spoke with KARADŽIĆ,³²⁵⁵ updating him on NICOLAI's complaint that the VRS was attacking UNPROFOR in Srebrenica.³²⁵⁶ GVERO referred to KARADŽIĆ as "President" and advised him that "[e]verything is going according to plan and do not worry."³²⁵⁷

889. Approximately 20 minutes later, GVERO again spoke to KARADŽIĆ to report that Srebrenica had fallen. He advised KARADŽIĆ that the Serbian flag was flying above the Serbian church in Srebrenica but that NATO planes were in the air

because he was dealing with the Sarajevo theatre at the time. M.KARIŠIĆ:T.40607-40608; D3749,para.60. KOVAČ claimed that the 10 July order was sent to the field "using [his] name, but without [his] knowledge". T.KOVAČ:D3960,para.114. *See also* T.KOVAČ:T.42733-42737; DCC(M.KARIŠIĆ; T.KOVAČ).

³²⁴⁹ *See* V.G.2.(c): 12 July, BOROVIČANIN took control of Potočari.

³²⁵⁰ *See* Srebrenica Narrative, paras.11,14,19.

³²⁵¹ *See* Srebrenica Narrative, paras.36-37,45.

³²⁵² *See* Srebrenica Narrative, paras.54-73.

³²⁵³ P4541 and P4632 are two different records of this conversation. P4632 records only what GVERO says because NICOLAI's voice could not be heard by the intercept operators. *See also* P3992; P4669,pp.2-9.

³²⁵⁴ P4541; P4632.

³²⁵⁵ P4630.

³²⁵⁶ P4629.

³²⁵⁷ P4629.

again above Srebrenica.³²⁵⁸ **KARADŽIĆ** ordered that the NATO jets be shot down if they dived.³²⁵⁹

890. **KARADŽIĆ** has maintained on the record that he is not the collocutor with GVERO in these conversations,³²⁶⁰ but this is untrue. First, the relevant ABiH intercept operator recorded contemporaneously and reliably that GVERO and **KARADŽIĆ** were the collocutors in both conversations.³²⁶¹ The second conversation was separately recorded and noted **KARADŽIĆ** as one of the speakers.³²⁶² [REDACTED]
[REDACTED] Second, GVERO's references to "President" and his respectful tone indicate that he was speaking to **KARADŽIĆ**, to whom he was subordinated. Third, **KARADŽIĆ** was the only President with the authority to order GVERO to shoot down a NATO jet. Fourth, the content and context of the conversations signify that **KARADŽIĆ** was a participant. The first conversation occurred just minutes after an exchange between GVERO and NICOLAI regarding attacks on UNPROFOR.³²⁶⁴ The second conversation followed the significant news that Srebrenica had fallen but that NATO jets were still a threat. **KARADŽIĆ** was the only President directly implicated in the Srebrenica campaign so as to require information of this nature on an immediate basis.

891. After his call with **KARADŽIĆ**, GVERO lied to GOBILLIARD, claiming that the VRS had never attacked UNPROFOR, and that neither the UN nor the Muslim civilians were the VRS' enemy.³²⁶⁵ He warned that UN soldiers would be safe if they "do not take any actions today", and emphasised that calling in air support "was a fatal mistake".³²⁶⁶ He added that the Muslim civilians "would be totally safe and were welcome to leave the enclave."³²⁶⁷ This was another deliberate lie, as the evidence shows. Plans to continue the air strikes were abandoned following VRS

³²⁵⁸ P4630. *See also* P4669, pp.18-22; P4201, V000-9014, 00:27:50-00:28:00 (11 July 1995 footage of the Orthodox Church in Srebrenica with Serbian flag).

³²⁵⁹ P4633.

³²⁶⁰ *See* R.SMITH:T.11689-11690; KDZ357:T.26423-26426, 26461. *See also* KDZ357:T.26416-26421.

³²⁶¹ KDZ357:T.26417-26431, 26463-26464.

³²⁶² P4633.

³²⁶³ P4633. [REDACTED]
[REDACTED]. P4633;

³²⁶⁴ P4632; P4541.

³²⁶⁵ P2435, p.1. *See also* P4679.

³²⁶⁶ P4679, p.2.

threats to kill Dutch troops being held in VRS custody, and threats to shell the UN Potočari compound where thousands were sheltering.³²⁶⁸

(e) 11 July, "The time has come to take revenge on the Turks"

892. By the morning of 11 July, the ABiH "had disappeared" from the enclave.³²⁶⁹ Muslim "refugees", desperate for protection, crowded in and around the Bravo Company compound in Srebrenica, which the VRS shelled. Thousands fled to the UNPROFOR compound in Potočari and sought protection there.³²⁷⁰

893. On 11 July, the VRS entered the town of Srebrenica.³²⁷¹ The first outward indication that the longstanding objective of the Overarching JCE had been supplemented by a new common plan came on the late afternoon of 11 July, when MLADIĆ, accompanied by ŽIVANOVIĆ³²⁷², KRSTIĆ,³²⁷³ POPOVIĆ³²⁷⁴ and other VRS officers, including TRIVIĆ³²⁷⁵ and ANDRIĆ,³²⁷⁶ took a triumphant walk through the empty streets of Srebrenica town.³²⁷⁷ MLADIĆ stated into a TV camera:

Here we are, on 11 July 1995, in Serb Srebrenica. On the eve of yet [another] great Serb holiday, we give this town to the Serb people as a gift. Finally, after the Rebellion against the Dahis, *the time has come to take revenge on the Turks in this region.*³²⁷⁸

894. By the end of 11 July, it was estimated that over 20,000 Bosnian Muslim "refugees" were in Potočari.³²⁷⁹ A column of between 13,000-15,000 mostly men and boys aged between 16-65 years had set out that evening from Jagličići and Šušnjari to Bosnian-Muslim held territory in the north. Around one-third were 28th Division soldiers, not all armed.³²⁸⁰

³²⁶⁷ P2435,p.2. See also P4679,pp.1-2.

³²⁶⁸ AF1497; R.FRANKEN:P4175,para.65; J.KINGORI:P4140,para.137; P3992; P.BOERING:P3969,pp.61-62; P4154,p.4.

³²⁶⁹ R.FRANKEN:P4175,para.57.

³²⁷⁰ See Srebrenica Narrative,para.10.

³²⁷¹ AF1488; P4201,V000-9014,00:23:04-00:24:36; P4202,pp.29-40.

³²⁷² P4202,pp.33,36,37.

³²⁷³ P4202,pp.32,38. See also D.ERDEMOVIĆ:P332,pp.38-39; P237.

³²⁷⁴ P4202,pp.37,38.

³²⁷⁵ P4202,p.35.

³²⁷⁶ P4202,p.39.

³²⁷⁷ AF1499; P4201,V000-9014,00:24:37-00:33:20; P4202,pp.32-40,197-205.

³²⁷⁸ P4201,V000-9014,00:30:42-00:31:07; P4202,p.203(emphasis added).

³²⁷⁹ See Srebrenica Narrative,paras.10,12.

³²⁸⁰ See Srebrenica Narrative,para.9.

(f) 11 July, First Meeting at Hotel Fontana

895. During the day and evening of 11 July, the VRS became aware of the presence of 1,000-2,000 able-bodied men among the Bosnian Muslim population around the DutchBat compound in Potočari.³²⁸¹ Momir NIKOLIĆ reported this information to the Bratunac Brigade command, and to the DK intelligence and security officers whom he knew to be at Hotel Fontana.³²⁸² This information would have been available to MLADIĆ at his meetings at Hotel Fontana that night.³²⁸³ Given the regularity with which the VRS, MUP and DB shared intelligence during the Srebrenica events,³²⁸⁴ senior RS MUP and DB officials must have been aware of this significant information at the time.

896. At around 20:00 on 11 July, UNPROFOR leaders met with VRS officials for the first of three meetings at Hotel Fontana in Bratunac.³²⁸⁵ The first meeting was attended by MLADIĆ, and other VRS officers, including ŽIVANOVIĆ, KRSTIĆ, KOSORIĆ and JANKOVIĆ.³²⁸⁶ KARREMANS, BOERING and RAVE attended from DutchBat's Command Staff.³²⁸⁷

897. MLADIĆ dominated the meeting.³²⁸⁸ He inquired menacingly about who had ordered NATO air strikes and threatened to harm DutchBat soldiers.³²⁸⁹ MLADIĆ demanded an end to air support and threatened to shell the UN Potočari compound along with the Muslim refugees.³²⁹⁰ He told KARREMANS that "you can [...] all

³²⁸¹ M.NIKOLIĆ:T.24614-24615; M.NIKOLIĆ:D2081,p.1. NIKOLIĆ received this information through both the regular chain of command and the professional line of reporting in the VRS. M.NIKOLIĆ:T.24614.

³²⁸² M.NIKOLIĆ:D2081,p.1.

³²⁸³ M.NIKOLIĆ was present at Hotel Fontana at the time of the two meetings on 11 July. M.NIKOLIĆ:D2081,p.1; M.NIKOLIĆ,T.24610-24615; AF1520; P.BOERING:P3969,pp.74-75,84. *See also* E.RAVE:P3995,paras.66,80; P.BOERING:P3969,p.84. At the Second Hotel Fontana meeting, KARREMANS said there were between 15,000-20,000 refugees, approximately 95% women and children. P4202,pp.230-231.

³²⁸⁴ *See* V.D.1:Functioning reporting chain.

³²⁸⁵ AF1516; PBOERING:P3969,p.74; E.RAVE:P3995,para.67; P4201,V000-9014,00:33:21-01:12:42; P4202,pp.41-44,205-229.

³²⁸⁶ AF1520-AF1521; P4202,pp.43-44; M.NIKOLIĆ:D2081,p.1; M.NIKOLIĆ:T.24610-24612; P.BOERING:P3969,pp.74-75; E.RAVE:P3995,paras.68,70,76; S.KOSORIĆ:T.38694.

³²⁸⁷ AF1517-AF1518; P.BOERING:P3969,p.73; E.RAVE:P3995,para.78.

³²⁸⁸ AF1519; P4201,V000-9014,00:33:21-01:12:42; P4202,pp.41-44,205-229.

³²⁸⁹ P.BOERING:P3969,pp.77-78; E.RAVE:P3995,paras.69-70. The video footage does not capture MLADIĆ's threats to shell the UN and refugees in Potočari and harm UN soldiers held at Hotel Fontana if the air strikes continued. E.RAVE:P3995,para.76; P4201,V000-9014,00:33:21-00:40:01; P4202,pp.41,205-208,221.

³²⁹⁰ P3974,p.1; E.RAVE:P3995,para.69; P.BOERING:P3969, p.78.

leave [...] all stay [...] or all die here",³²⁹¹ and warned, "make sure your airforce is not airborne".³²⁹² The meeting ended with MLADIĆ instructing KARREMANS to bring representatives of the Muslim civilians and ABiH to a second meeting later that evening ("Second Hotel Fontana Meeting").³²⁹³

(g) 11 July, MLADIĆ ordered ŠKRBIĆ to arrange buses

898. On the evening³²⁹⁴ of 11 July, MLADIĆ ordered Petar ŠKRBIĆ, VRS Assistant Commander for Organisation, Mobilisation and Personnel Affairs, to arrange buses to be sent to Bratunac by the following afternoon.³²⁹⁵ ŠKRBIĆ telephoned KOVAČEVIĆ at the MOD, and followed up with a written request that the MOD issue an order to their secretariats to mobilise buses to be sent to Bratunac by 14:30 on 12 July,³²⁹⁶ which the MOD duly issued.³²⁹⁷ At about 07:35 on 12 July, KRSTIĆ, also on MLADIĆ's orders,³²⁹⁸ ordered Col. KRSMANOVIĆ, the DK's Chief of Transportation Services, to obtain 50 buses to be at the stadium in Bratunac by that afternoon.³²⁹⁹ ŽIVANOVIĆ followed up at around 10:00 with a request to the VRS-GŠ for fuel.³³⁰⁰

899. Buses were procured both from VRS units and, through the MOD, from state and private owners³³⁰¹ to a level that "paralysed" passenger transport.³³⁰² By the early afternoon of 12 July, the removal of the women, children and elderly in Potočari had begun.³³⁰³

³²⁹¹ AF1523; P4201, V000-9014, 01:01:43-01:01:55; P4202, pp.41, 221.

³²⁹² P4201, V000-9014, 01:09:37-01:09:40; P4202, pp.41, 43, 227.

³²⁹³ AF1524-AF1526; P4201, V000-9014, 01:01:18-01:12:42; P4202, pp.221-229.

³²⁹⁴ P.ŠKRBIĆ:T.25973, 26004-26007.

³²⁹⁵ P.ŠKRBIĆ:T.25972-25974; P4523, pp.11-13. ŠKRBIĆ testified that he received MLADIĆ's order from someone calling from extension 250, which was MLADIĆ's line, and that he was also told that the order came from MLADIĆ. P.ŠKRBIĆ:T.25974.

³²⁹⁶ P.ŠKRBIĆ:P4523, pp.8-12, 15-16; P4525.

³²⁹⁷ P.ŠKRBIĆ:P4523, pp.13-20; P4526; P4527; P4528; P4538; P4539. *See also* P4529; P4530; P4531.

³²⁹⁸ ŽIVANOVIĆ states in his request for fuel from the VRS-GŠ (timed at around 10:00): "[p]ursuant to the VRS GŠ Commander's order to provide 50 buses for evacuation from the Srebrenica enclave". D1971. *See also* P4533; P4540.

³²⁹⁹ P4680.

³³⁰⁰ D1971; P5901; P5364.

³³⁰¹ P.ŠKRBIĆ:P4523, pp.8-23; P.ŠKRBIĆ:T.25973-25977, 26004-26007; P4538; P4552; P4533;

P4525. *See also* P4960, p.2.

³³⁰² P4552.

³³⁰³ D2258; P4388, p.2; P4939; P5172, pp.3, 5, 7.

(h) 11 July, KARADŽIĆ issued two Decisions/Orders

900. In the late evening of 11 July 1995, **KARADŽIĆ** issued two written decisions/orders as a significant step in implementing the decision to finally remove the Bosnian Muslim population from Srebrenica. Both decisions also reflect **KARADŽIĆ**'s authority and control over the civilian and RS MUP structures used to implement the JCE to Eliminate in the following days, and both ensured their cooperation under his authority and control.

901. First, **KARADŽIĆ** appointed DERONJIĆ as "Civilian Commissioner for the Serbian Municipality of Srebrenica" and ordered him to establish civilian authorities in Srebrenica in cooperation with the MUP.³³⁰⁴ Second, **KARADŽIĆ** issued an order to the MUP to establish a Public Security Station in "Serb Srebrenica" and directed the MUP to "establish close cooperation with Miroslav DERONJIĆ".³³⁰⁵

902. By appointing DERONJIĆ and establishing RS authorities in Srebrenica, **KARADŽIĆ** was identifying the Srebrenica area permanently as Bosnian Serb territory. Both decisions ordered that civilians (other than those who had "participated in combat") be free to "choose" whether to leave the enclave or stay.³³⁰⁶ This was knowingly false and another simulation of adherence to law—a transparent veneer proven a lie by **KARADŽIĆ**'s longstanding intent to remove the Muslim civilians from Srebrenica and indeed the flight of Muslims to Potočari in fear and terror which was the culmination of his order to create an unbearable situation of total insecurity with no hope of further survival or life in Srebrenica.³³⁰⁷

903. DERONJIĆ's appointment and the establishment of the MUP were communicated down the chain of command and acted upon.³³⁰⁸ DERONJIĆ called meetings that night and the next day to inform officials of his appointment.³³⁰⁹ At the latter meeting on 12 July, after **KARADŽIĆ** had a private conversation with DERONJIĆ, **KARADŽIĆ** informed the gathered officials on speaker-phone that

³³⁰⁴ D2055.

³³⁰⁵ P2994.

³³⁰⁶ D2055; P2994.

³³⁰⁷ See V.E.2:Directive 7; Srebrenica Narrative, paras.5-18,24,28-32.

³³⁰⁸ DERONJIĆ's appointment as Civilian Commissioner was forwarded to the Bratunac Municipal Assembly at 23:10 on 11 July 1995. P2803,p.3. KOVAČ forwarded and implemented **KARADŽIĆ**'s order on the night of 11/12 July and VASIĆ subsequently reported back on its implementation. P2995; P2996; R.BUTLER:T.27512-27513,27515-27516; C.NIELSEN:T.16338-16440.

DERONJIĆ had been appointed Civilian Commissioner for Srebrenica, was "responsible" to him for all civilian affairs in the municipality of Srebrenica³³¹⁰ and [REDACTED] They, in turn, were "directly responsible" to DERONJIĆ.³³¹² [REDACTED]³³¹³ and [REDACTED] were amongst those present during the call on 12 July.

904. **KARADŽIĆ**'s appointment of DERONJIĆ and the subsequent telephone call both reinforced his *de jure* and *de facto* control over DERONJIĆ and his subordinates, and strengthened DERONJIĆ's considerable authority over civilian officials in the Bratunac and Srebrenica areas.³³¹⁵ In addition to ordering the MUP to cooperate with DERONJIĆ,³³¹⁶ **KARADŽIĆ** gave DERONJIĆ authority over the treatment of "prisoners of war".³³¹⁷

905. At around 22:30 on 11 July, **KARADŽIĆ** met with KARIŠIĆ in Pale.³³¹⁸ KARIŠIĆ had travelled to Zvornik during the day and checked on the status of preparations ("expressed an interest")³³¹⁹ as the Zvornik CJB PJP prepared to deploy to the Srebrenica area pursuant to KOVAČ's 10 July order.³³²⁰ On his return, he would have briefed **KARADŽIĆ** before the operation to be led by BOROVIČANIN on the following day.³³²¹ KARIŠIĆ claimed, in evidence, that he was "sure" he "did not speak with the president about Srebrenica" because he had "no information";³³²² he was conducting "completely different activities related to the Sarajevo front" on 11 July.³³²³ This denial—from a witness demonstrably lacking in credibility³³²⁴—is

³³⁰⁹ D.KATANIĆ:D3561,para.6; D.KATANIĆ:T.38656-38657.

³³¹⁰ M.KATANIĆ:P4374,para.59; A.TEŠIĆ:D3118,para.38; [REDACTED]

³³¹¹ M.KATANIĆ:P4374,para.59; [REDACTED]

³³¹² M.KATANIĆ:P4374,para.59; M.KATANIĆ:T.24465.

³³¹³ A.TEŠIĆ:D3118,para.37. [REDACTED]

³³¹⁴ [REDACTED]

³³¹⁵ See V.C.3.(a):DERONJIĆ and municipal authorities.

³³¹⁶ P2994.

³³¹⁷ In this respect, D2055 ordered: "The commissioner *shall ensure that all civilian and military organs* treat all citizens who participated in combat [...] as prisoners of war"(emphasis added).

³³¹⁸ P2242,p.90.

³³¹⁹ P6190,p.1; M.ĐURIĆ(KW117):T.35037. See also P4581. KARIŠIĆ testified that he could not remember if he went to Zvornik on 11 July. M.KARIŠIĆ:T.40611-40612; M.ĐURIĆ:T.35036,35039; P2992/P2993(duplicates).

³³²⁰ P2992/P2993(duplicates). KARIŠIĆ claimed that he could not remember but it was "possible" that he had travelled to Zvornik. M.KARIŠIĆ:T.40611-40615.

³³²¹ P2987. See also P2996.

³³²² M.KARIŠIĆ:T.40615. See also M.KARIŠIĆ:T.40621.

³³²³ M.KARIŠIĆ:T.40616. See also M.KARIŠIĆ:D3749,para.60.

utterly implausible. The only reasonable inference is that KARIŠIK travelled to Zvornik that day, and back to Pale to meet **KARADŽIĆ** that night, to report on the deployment of MUP forces to the Srebrenica area.

906. Late that night, KOVAČ issued two written orders. The first forwarded and implemented **KARADŽIĆ**'s 11 July decision concerning the MUP,³³²⁵ and the second ordered the commander of the RS MUP's "Centre for the breeding and training of police dogs" to "[u]rgently dispatch all available guides with police dogs to the Srebrenica sector" by 06:00 on 12 July and to report to BOROVIČANIN.³³²⁶ The second order related to the "*čišćenje terena*"—cleansing/mopping up of terrain—in the Srebrenica sector, a reference to the removal of the civilian population from Potočari.³³²⁷

907. At or around the time of his meeting with KARIŠIK, **KARADŽIĆ** would have been informed through one or more of his reporting chains within the MUP, VRS and civilian authorities of conditions in Potočari and the progress and outcome of the two Hotel Fontana meetings. First, there were DB operatives reporting to KIJAC from both Bratunac and Potočari; KIJAC was in turn reporting his information to both KOVAČ and KARIŠIK.³³²⁸ Second, there were civilian representatives present at the Second Hotel Fontana Meeting.³³²⁹ **KARADŽIĆ** must have been in direct contact at least with DERONJIĆ who, as Civilian Commissioner of Srebrenica, had arranged a meeting with civilian officials that night to inform them of **KARADŽIĆ**'s decision.³³³⁰ Third, **KARADŽIĆ** was also in direct contact with the VRS.³³³¹

³³²⁴ See DCC(M.KARIŠIK).

³³²⁵ P2995,p.1(A hand-written note on the first page of KOVAČ's order reads: "[c]opy given to duty officer at 0235 hours"); P2994. KOVAČ gave implausible evidence that his 12 July order "went out of [his] office but not with [his] knowledge". Shown an earlier interview, when he said the opposite, KOVAČ claimed that he believed his answers "[we]re completely the same". T.KOVAČ:T.42739-42741. VASIĆ reported back on the morning of 12 July on the implementation of his orders from KOVAČ. P2996.

³³²⁶ P4934.

³³²⁷ P4934.

³³²⁸ P5089; P2986; P5091; P4936; P4939; P4389; D4152.

³³²⁹ See V.G.1.(j):11 July, Second Hotel Fontana Meeting.

³³³⁰ D.KATANIĆ:D3561,para.6; D.KATANIĆ:T.38656-38657.

³³³¹ M.ŽIVANOVIĆ:D3932,para.8. See DCC(M.ŽIVANOVIĆ).

908. By this time, reports to **KARADŽIĆ** would have included information on the 1,000-2,000 Muslim men in the crowd in Potočari.³³³² This information was particularly important to the MUP as MUP units were to lead the entry into Potočari the next morning. Both **KARADŽIĆ**'s decisions also contained orders related to the treatment of Muslim men ("citizens" who participated in "combat"), instructing that they be treated as PoWs, and (in relation to the MUP order) in accordance with international conventions.³³³³ These instructions—that Muslim men were to be treated in accordance with international conventions—were knowingly false, but the references to PoWs nevertheless evidenced **KARADŽIĆ**'s awareness that the able-bodied Muslim men in Potočari would be separated from the rest of the population and detained. As the evidence shows, the separation and detention of Muslim men was an integral part of, and the first step in the murder operation.³³³⁴

(i) 11 July, **KARADŽIĆ** re-affirmed control over humanitarian access

909. At around 22:45 on 11 July, **KARADŽIĆ** re-affirmed his authority and control over humanitarian access to the enclave through the issuance of an order requiring that approval for cooperation with the UN and international humanitarian organisations be given "exclusively by the State Committee" and "following prior consultation" with him.³³³⁵

910. **KARADŽIĆ** knew that humanitarian access to the enclaves would become an issue in the coming days, and by this order ensured that the Bosnian Serb relationship with international humanitarian actors, including UNHCR, ICRC and MSF, was ultimately controlled by him. This order became a means by which **KARADŽIĆ** controlled access to the enclave by international organisations, including UNHCR and ICRC, allowing the murder operation to proceed unchecked.³³³⁶

³³³² See V.G.1.(f):11 July, First Meeting at Hotel Fontana.

³³³³ D2055; P2994.

³³³⁴ See Srebrenica Narrative, paras.19-23,25-27,36-48.

³³³⁵ P5183. See P2803,p.3,line326. This directive was forwarded and implemented by KOVAČ on 12 July. P2997. KOVAČ's order also evidences the continued cooperation between the VRS and MUP during the Srebrenica events. P2997,p.2; C.NIELSEN:T.16340-16341. See also P4543.

³³³⁶ See V.E:GOALS of **KARADŽIĆ** and BSL for the Podrinje; Podrinje Summary, paras.30-37. See also P4536.

(j) 11 July, Second Hotel Fontana Meeting

911. At around 23:00,³³³⁷ MLADIĆ, along with KRSTIĆ, JANKOVIĆ and KOSORIĆ, met KARREMANS for a second time at Hotel Fontana. KARREMANS was accompanied by DutchBat officers BOERING, RAVE, and a Muslim civilian representative, Nesib MANDŽIĆ.³³³⁸ Serb civilians from the police and local Bratunac authorities were also present, including Ljubisav SIMIĆ.³³³⁹ MLADIĆ again created an atmosphere of intimidation and control,³³⁴⁰ threatening MANDŽIĆ and telling him "the future of your people is in your hands".³³⁴¹ MLADIĆ gave MANDŽIĆ an ultimatum, foreshadowing future events:

In order to make a decision as a man and a Commander, I need to have a clear position of the representatives of your people on whether you want to survive... stay or vanish.³³⁴²

912. MLADIĆ said that the Serbs would provide transportation for the Bosnian Muslim population and discussed the provision of fuel.³³⁴³ He had, by this time, ordered ŠKRBIĆ to make arrangements for the provision of buses.³³⁴⁴ He then focused on his principal interest: securing the surrender of the able-bodied Muslim men.³³⁴⁵ He claimed, falsely, that the Muslim soldiers who laid down their arms would be treated in accordance with international conventions,³³⁴⁶ stating "we guarantee that everybody will live, even those who committed crimes against our people."³³⁴⁷

913. Insisting on another meeting for the following day ("Third Hotel Fontana Meeting"),³³⁴⁸ MLADIĆ ordered MANDŽIĆ to:

³³³⁷ E.RAVE:P3995,para.78; AF1527.

³³³⁸ AF1530-AF1531; E.RAVE:P3995,paras.77,80.

³³³⁹ E.RAVE:P3995,para.80; P.BOERING:P3969,p.84. The Prosecution notes that not all the meeting was taped. P.BOERING:P3969,p.91.

³³⁴⁰ AF1528; P.BOERING:P3969,pp.85,91-92; E.RAVE:P3995,paras.78-79,81; E.RAVE:T.22176-22178,22228-22229.

³³⁴¹ P4202,p.241.

³³⁴² P4202,p.241. *See also* E.RAVE:P3995,para.82; AF1533-AF1534.

³³⁴³ AF1532; E.RAVE:P3995,paras.82-83.

³³⁴⁴ *See* V.G.1.(g):11 July, MLADIĆ ordered ŠKRBIĆ to arrange buses. P.ŠKRBIĆ:T.25972-25973,26004-26007.

³³⁴⁵ E.RAVE:P3995,para.84.

³³⁴⁶ P4202,p.241.

³³⁴⁷ P4202,p.241.

³³⁴⁸ P4202,p.241; E.RAVE:P3995,para.86; AF1536.

[b]ring the people who can secure the surrender of weapons and save your people from destruction.³³⁴⁹

(k) 11 July, MLADIĆ ordered BOROVIČANIN to attack Potočari

914. After his first meeting with UNPROFOR officers and others at Hotel Fontana in Bratunac on 11 July, MLADIĆ ordered BOROVIČANIN, who was deployed to the area pursuant to **KARADŽIĆ**'s orders,³³⁵⁰ to "launch an attack" on Potočari "in the early hours of the following morning".³³⁵¹ On the morning of 12 July, BOROVIČANIN duly led joint VRS and RS MUP forces towards Potočari.³³⁵² Within less than two days, the Bosnian Muslim women, children and some elderly men in Potočari were removed, and thousands of men and boys detained, both separated in Potočari and captured or surrendered in sweep operations on the Bratunac–Konjević Polje–Milići road.³³⁵³

915. All of these acts, coupled with the explicit instructions given to Momir NIKOLIĆ the following morning—and the evidence of what then happened—overwhelmingly makes clear that **KARADŽIĆ** and MLADIĆ were acting in concert on the night of 11 July to establish structures and means to implement the JCE to Eliminate. The evidence overwhelmingly shows that by this time **KARADŽIĆ** had directed and approved the forcible removal and murder operations.

2. Implementation of the JCE to Eliminate, 12-17 July

(a) 12 July, Momir NIKOLIĆ told about the plan to separate and kill Muslim men

916. Momir NIKOLIĆ spoke to POPOVIĆ and KOSORIĆ on 12 July outside Hotel Fontana, prior to the Third Hotel Fontana Meeting at 10:00. POPOVIĆ was the first to tell him there would be an operation transferring Bosnian Muslim women and children to Muslim-held territory, and that military-aged or able-bodied men would be separated and killed, "every one of them".³³⁵⁴ Momir NIKOLIĆ then had the same

³³⁴⁹ P4202,p.241.

³³⁵⁰ P2992/P2993(duplicates).

³³⁵¹ P4960,p.1.

³³⁵² P4960,p.2.

³³⁵³ See Srebrenica Narrative,paras.14-32.

³³⁵⁴ M.NIKOLIĆ:T.24621,24646-24647; M.NIKOLIĆ:D2081,para.4.

conversation with KOSORIĆ.³³⁵⁵ Momir NIKOLIĆ suggested empty buildings in the centre of Bratunac town to detain the men, including the Vuk Karadžić school and the hangar; and two locations where they could be executed, the Ciglana (brick factory), and the Sase mine.³³⁵⁶ POPOVIĆ told Momir NIKOLIĆ that it was his responsibility to help coordinate and organise the operation.³³⁵⁷

917. Momir NIKOLIĆ's evidence related to this conversation (and a later related conversation with JANKOVIĆ)³³⁵⁸ is reliable and corroborated by other reliable evidence. First, video evidence shows NIKOLIĆ talking outside Hotel Fontana with JANKOVIĆ, POPOVIĆ, and Branislav PUHALO (MLADIĆ's bodyguard) before the Third Hotel Fontana Meeting began,³³⁵⁹ and that KOSORIĆ and POPOVIĆ were present at the Third Hotel Fontana Meeting.³³⁶⁰ Second, Petar UŠČUMLIĆ's evidence corroborates NIKOLIĆ's testimony that a conversation between him, POPOVIĆ and KOSORIĆ took place.³³⁶¹ UŠČUMLIĆ's evidence does not contradict NIKOLIĆ's evidence as to the content of his conversation with POPOVIĆ and KOSORIĆ; he merely stated that he "never heard anyone say that the prisoners from Srebrenica should or would be killed".³³⁶² Third, BOERING saw KOSORIĆ and NIKOLIĆ together in Bratunac after the Third Hotel Fontana Meeting.³³⁶³

918. Fourth, several, specific events which followed the conversation support NIKOLIĆ's version of what was discussed. At the Third Hotel Fontana Meeting, MLADIĆ announced for the first time the separation and "screening" of men to be carried out in Potočari.³³⁶⁴ NIKOLIĆ claimed that he had suggested the Vuk Karadžić School and the hangar as detention sites, and indeed those sites were ultimately used.³³⁶⁵ Further, NIKOLIĆ mentioned the Ciglana as a potential execution site,³³⁶⁶

³³⁵⁵ M.NIKOLIĆ:T.24623.

³³⁵⁶ M.NIKOLIĆ:T.24622,24648; M.NIKOLIĆ:D2081,p.2.

³³⁵⁷ M.NIKOLIĆ:D2081,para.4.

³³⁵⁸ See V.G.2.(b):12 July, KARADŽIĆ's subordinates working together in Bratunac.

³³⁵⁹ P4201,V000-9035,00:05:30-00:05:45; P4202,pp.61-63,245.

³³⁶⁰ P4201,V000-9035,00:06:47-00:15:06; P4202,pp.61,65,68,245-250.

³³⁶¹ P.UŠČUMLIĆ:D3552. See also M.NIKOLIĆ:T.24623.

³³⁶² D3552,p.1.

³³⁶³ P.BOERING:P3969,pp.108-109.

³³⁶⁴ AF1545; P.BOERING:T.22063-22065; P.BOERING:P3969,pp.100-101,104-105.

³³⁶⁵ See Srebrenica Narrative,paras.80-84.

³³⁶⁶ M.NIKOLIĆ also testified that he found out later that some officers went to the Ciglana/brick factory and asked about it as a possible execution site. M.NIKOLIĆ:T.24622. N.NIKOLIĆ testified that VRS officers, including M.NIKOLIĆ, visited the Ciglana on 14 July. This evidence is mistaken as to the date, or entirely dishonest, because on the morning of 14 July, the convoy of Muslim men was on its way to Zvornik. N.NIKOLIĆ:D3690,paras.15-17,18B. See Srebrenica Narrative,para.96.

and BEARA visited this location with DERONJIĆ looking for a site to detain Muslim men.³³⁶⁷

919. Finally, NIKOLIĆ's account of what he was told would happen to the Muslim men in Potočari corresponds exactly to the tragic events which then followed, as set out in detail in the Srebrenica Narrative.

(b) 12 July, KARADŽIĆ's subordinates working together in Bratunac

920. On the morning of 12 July, KARADŽIĆ's subordinates were working together in Bratunac to coordinate efforts in advance of the takeover of Potočari and the commencement of the removal of the women and children, as well as the separations and detentions of the men.

921. At around 08:00, as forces under BOROVIĆANIN's command were advancing on Potočari,³³⁶⁸ MLADIĆ and KRSTIĆ held a meeting at the Bratunac Brigade, attended by VASIĆ, at which "tasks were assigned to all participants".³³⁶⁹ Srblisav DAVIDOVIĆ, Aleksandar TEŠIĆ and Ljubisav SIMIĆ, representing the local civilian authorities, also met MLADIĆ at the Bratunac Brigade before the Third Hotel Fontana Meeting.³³⁷⁰ DERONJIĆ met with VASIĆ and NIKOLIĆ at the SDS office in Bratunac.³³⁷¹ Plainly these meetings involved steps to be taken by each of the RS MUP, VRS and civilian authorities in implementation of the JCE to Eliminate. There was no other reason for all of these actors to be congregating in Bratunac on the morning of 12 July.

922. At 10:00 on 12 July, the third and final meeting at Hotel Fontana took place. Present were MLADIĆ, KRSTIĆ, JANKOVIĆ, KOSORIĆ and POPOVIĆ, along with DERONJIĆ, SIMIĆ and DAVIDOVIĆ, on behalf of the local civilian authorities, VASIĆ, on behalf of the MUP, KARREMANS and BOERING,

³³⁶⁷ M.KATANIĆ:P4374,para.84. See also M.KATANIĆ:T.24549-24550.

³³⁶⁸ P2987,p.1; P4960,pp.1-2. See also P2996/P4373(duplicates); R.PATELSKI:P4173,paras.15-17; M.PEPIĆ:P373,pp.3,10-11; [REDACTED]

³³⁶⁹ P2996/P4373(duplicates); M.NIKOLIĆ:T.24617-24618.

³³⁷⁰ S.DAVIDOVIĆ:P4100,pp.19-22; A.TEŠIĆ:D3118,paras.33-34; L.SIMIĆ:D3398,para.72; L.SIMIĆ:T.37264. SIMIĆ testified that VASIĆ and KRSTIĆ were not there when he met with MLADIĆ and DAVIDOVIĆ. L.SIMIĆ:T.37264.

representing UNPROFOR, and MANDŽIĆ and two additional Muslim representatives, Ibro NUHANOVIĆ and Čamila OMANOVIĆ.³³⁷²

923. The clear aim of this meeting was to facilitate the removal of the women and children from Potočari and the separations of the Muslim men and boys, through intimidating the Bosnian Muslim representatives, and ensuring the continued passivity of DutchBat. As VASIĆ stated in his report to KOVAČ, prior to the meeting:

an agreement *will be reached* on the evacuation of the civilian population [...] 100 trailer trucks have been provided for transport.³³⁷³

924. The Bosnian Muslim population had no genuine choice to remain in Srebrenica.³³⁷⁴ Apart from the other aspects of Directive 7's implementation that the population had experienced, **KARADŽIĆ** had already established Serb institutions in Srebrenica,³³⁷⁵ and MLADIĆ had ordered both the attack on Potočari³³⁷⁶ and buses for the removal of the Muslim population³³⁷⁷ the evening before. FRANKEN testified that the Muslim population "did not have a realistic opportunity to stay or to move in any direction."³³⁷⁸ As VASIĆ also reported before the third meeting, Bosnian Serb Forces were advancing on Potočari "with the aim of taking UNPROFOR personnel prisoner" and "surrounding the entire civilian population".³³⁷⁹ MLADIĆ was intercepted in a conversation at 12:50 saying:

They've all capitulated and surrendered and we'll evacuate them all – those who want to and those who don't want to.³³⁸⁰

925. During the meeting, the Bosnian Muslim representatives "request[ed] free passage for able-bodied men because, allegedly, they [we]re unarmed and they [we]re

³³⁷¹ P2996/P4373(duplicates). VASIĆ had made contact with DERONJIĆ by the time of writing this report. KATANIĆ saw VASIĆ and NIKOLIĆ meet DERONJIĆ at the SDS office but was unsure of whether they met DERONJIĆ separately or together. M.KATANIĆ:P4374,para.68.

³³⁷² AF1537-AF1540; P4201,V000-9035,00:06:47-00:15:06; P4202,pp.61-68,245-250; P.BOERING:P3969,pp.100-101; P.BOERING:T.22060-22065; Lj.SIMIĆ:D3398,paras.72-73; Lj.SIMIĆ:T.37270; S.DAVIDOVIĆ:P4100,pp.23-25; S.DAVIDOVIĆ:T.24403.

³³⁷³ P2996/P4373,para.5(duplicates)(emphasis added).

³³⁷⁴ See Srebrenica Narrative,paras.5-18,24,28-32.

³³⁷⁵ See V.G.1.(h):11 July, **KARADŽIĆ** issued two Decisions/Orders.

³³⁷⁶ See V.G.1.(k):11 July, MLADIĆ ordered BOROVIČANIN to attack Potočari.

³³⁷⁷ See V.G.1.(g):11 July, MLADIĆ ordered ŠKRBIĆ to arrange buses.

³³⁷⁸ R.FRANKEN:P4175,para.105. See also E.RAVE:T.22225.

³³⁷⁹ P2996/P4373,paras.3,6(duplicates).

³³⁸⁰ [REDACTED]. See also J.KINGORI:P4140,paras.167-168.

not in contact with their army in the woods."³³⁸¹ MLADIĆ demanded the "absolute co-operation" of the civilian population "because your army has been defeated", and demanded the "armed men" surrender their weapons.³³⁸² MLADIĆ repeated his threat from the Second Hotel Fontana Meeting that the Muslims could either "survive or disappear."³³⁸³ He declared that all Muslims had to lay down their arms as a condition for the survival of the Bosnian Muslim population.³³⁸⁴ He made several comments about the Muslims leaving the enclave, sometimes disingenuously adding that they could choose to remain in Srebrenica.³³⁸⁵

926. Finally, MLADIĆ announced that all Muslim men in Srebrenica between the ages of about 17 and 70 would have to be separated and screened as possible war criminals.³³⁸⁶ There was a lengthy discussion about this screening³³⁸⁷ and DAVIDOVIĆ was singled out as responsible for selecting potential war criminals from among the civilian population.³³⁸⁸ MLADIĆ's statement was untrue. There was never any organised screening or inspection of the prisoners at Potočari.³³⁸⁹ Instead, MLADIĆ made this false statement to give an appearance of legality to the detention of the Muslim men, to facilitate the implementation of the JCE by forestalling any interference from UNPROFOR.

927. After the Third Hotel Fontana Meeting, NIKOLIĆ spoke to JANKOVIĆ in front of the hotel. JANKOVIĆ said that everything had been agreed concerning the transfer of Muslims to Muslim-held territory. He told NIKOLIĆ to help during this operation and instructed him to meet SBP officer Duško JEVIĆ (aka "Stalin"), in Potočari.³³⁹⁰ JANKOVIĆ also told NIKOLIĆ to coordinate the transportation of all the women and children and the separation of the able-bodied Muslim men.³³⁹¹

³³⁸¹ P4935.

³³⁸² P4201,V000-9035,00:10:06-00:10:42; P4202,p.248.

³³⁸³ P4201,V000-9035,00:10:00-00:10:25; P4202,pp.61,64,67,248.

³³⁸⁴ AF1542; P4201,V000-9035,00:10:25-00:10:59; P4202,pp.61,64,67,248.

³³⁸⁵ P4201,V000-9035,00:11:33-00:12:30; P4202,pp.61,64,67,248-249.

³³⁸⁶ AF1545; P.BOERING:T.22063-22065; P.BOERING:P3969,pp.100-101,104-105. *See also* P4935; R.FRANKEN:P4175,para.86.

³³⁸⁷ P.BOERING:T.22064. This part of the meeting is not shown on the segment of video of the Third Hotel Fontana Meeting which forms part of P4201. P.BOERING:T.22064-22065.

³³⁸⁸ P.BOERING:P3969,p.105; P.BOERING:T.22063-22064; P4201,V000-9035,00:13:09 *See also* P4202,p.67(where the man identified on the video by BOERING as responsible for the "screening" is identified as DAVIDOVIĆ).

³³⁸⁹ *See* Srebrenica Narrative,para.22.

³³⁹⁰ M.NIKOLIĆ:T.24624-24625; D2081,para.5.

³³⁹¹ D2081,para.5.

928. At around midday on 12 July, ŽIVANOVIĆ gave a speech in Vlasenica in which he made clear that the Muslim population had no option to remain in Srebrenica.³³⁹² He described how the previous evening, when Srebrenica fell, "any organized Muslim life to the left of Jadar ceased existing".³³⁹³ He also stated that as of the morning of 12 July, one of the mosques in Srebrenica should have already been "flattened" or "finished".³³⁹⁴

(c) 12 July, BOROVIČANIN took control of Potočari

929. On the morning of 12 July, BOROVIČANIN led MUP forces towards Potočari,³³⁹⁵ taking over control by around 13:00.³³⁹⁶ Forces under his command included the 2nd Šekovići Police Detachment, the 1st Zvornik PJP Company, the Jahorina Recruits, and members of the Bratunac Brigade 2nd Battalion.³³⁹⁷ As reported by VASIĆ,³³⁹⁸ the operations in and around Potočari included steps to disable UNPROFOR to ensure their non-interference with the Srebrenica crimes.³³⁹⁹

(d) 12 July, POPOVIĆ and DB reported from Potočari

930. The separation of the men and boys in Potočari, without screening, and removal of their forms of identification, together with the organised transportation of the women and children on 12 and 13 July,³⁴⁰⁰ provided a clear indication of the common purpose to eliminate the Bosnian Muslims of Srebrenica. The MUP, DB and VRS all reported at this time on the numbers of able-bodied men in Potočari.³⁴⁰¹ By

³³⁹² P4201,V000-9035,00:30:55-00:45:43; P4202,pp.83-85,255-260; P6442.

³³⁹³ P4201,V000-9035,00:41:35-00:41:53; P4202,p.259. ŽIVANOVIĆ suggested that he was talking about the takeover of the dominant features on the left bank of the Jadar river. M.ŽIVANOVIĆ:T.42661-42662. It is clear when reviewing the whole of his speech he was referring to the removal of the Muslim population from Srebrenica. P4201,V000-9035,00:30:55-00:45:43; P4202,pp.83-85,255-260.

³³⁹⁴ P4202,p.258.

³³⁹⁵ P4960,pp.1-2; P2996/P4373(duplicates).

³³⁹⁶ P2987,p.1.

³³⁹⁷ P2987,p.1; P4960,pp.1-2; P2996/P4373(duplicates); R.FRANKEN:P4175,para.69;

R.PATELSKI:P4173,paras.13-17; M.PEPIĆ:P373,pp.3,9-11; [REDACTED]; P4388,p.1; M:ĐURIĆ:T.42080-42081; P4201,V000-9035,00:01:21-00:05:29,00:16:41-00:30:55,00:53:08-00:54:00; P4202,pp.57-60,69-81,91-98,242-245,250-255,265.

³³⁹⁸ P2996.

³³⁹⁹ See Srebrenica Narrative,para.33. The forcible removal and murder operations (in Potočari and Tišća) on 12 and 13 July are described in the Srebrenica Narrative,paras.12-32,34-35(Potočari),74-79(Tišća).

³⁴⁰⁰ See Srebrenica Narrative,paras.14-32.

³⁴⁰¹ BOROVIČANIN reported to the Pale Police Staff (KOVAČ) on 13 July that "approximately five percent" of the between 25,000 and 30,000 civilians gathered in Potočari were "able-bodied" men. P2987,p.1. KIJAC reported on 12 July information from the UNMOs that there was "not a single armed

around 17:30 on 12 July, POPOVIĆ reported to the VRS-GŠ OBP that 5,000 women and children had been removed from Potočari and that Muslim men were being separated:

We are separating men from 17-60 years of age and we are not transporting them. We have about 70 of them so far and the security organs and the DB /state security/ are working with them.³⁴⁰²

931. KIJAC, tellingly, distanced himself and the DB from any association with the VRS security organs, denying that the "one [...] possibly two" DB operatives in Potočari were taking part in "what is referred to" by POPOVIĆ,³⁴⁰³ or that the DB were interrogating prisoners in Potočari.³⁴⁰⁴ The evidence, however, shows that DB operatives were interrogating Muslim men in Potočari and also obtaining information from the UN³⁴⁰⁵ and other international organisations.³⁴⁰⁶ On 12 July, DB operatives Vito TOMIĆ and Siniša GLOGOVAC passed information to BOROVIČANIN as to the whereabouts of the column of Muslim men.³⁴⁰⁷ Acting upon this information, MLADIĆ ordered BOROVIČANIN to deploy MUP forces to block the area.³⁴⁰⁸

932. On the morning of 13 July, **KARADŽIĆ**'s official spokesman, ZAMETICA, made numerous false statements in an interview with the BBC about the Muslim men being separated and detained by Bosnian Serb Forces in Potočari.³⁴⁰⁹ ZAMETICA, representing **KARADŽIĆ**,³⁴¹⁰ revealed their awareness of the separations of Muslim men in Potočari but said this was "for a very good reason":

soldier of the so-called BH Army" among the refugees in Potočari. P4936. KIJAC later reported that "among the people staying in Potočari there are hardly any men fit for fighting". P4939,p.2. VASIĆ reported on 12 July to KOVAČ that "only 10 percent" of the refugees in Potočari were "conscripts from 17 to 60 years old". P4935.

³⁴⁰² P4388,p.2.

³⁴⁰³ D.KIJAC:T.44332.

³⁴⁰⁴ D.KIJAC:T.44332-44335. KIJAC conceded that DB operatives were conducting interviews at the Bratunac SJB. D.KIJAC:T.44334-44336. When informed on 12 July that Ibran MUSTAFIĆ, a former SDA deputy in the former BiH Assembly and "great opponent of Naser ORIĆ," had been identified as amongst the prisoners, KIJAC ordered RADOVIĆ, Chief of the Bijeljina CRDB, to lead an operation to remove MUSTAFIĆ from detention and transfer him to Bijeljina. P4389; D.KIJAC:D4143,para.50; D.KIJAC:T.44338-44339. MUSTAFIĆ had been held in the hangar behind the Vuk Karadžić School in Bratunac. KDZ039:P3940,p.23. *See also* R.DUKANOVIĆ:T.36165.

³⁴⁰⁵ P4152; P2986.

³⁴⁰⁶ P4936.

³⁴⁰⁷ P4960,p.2; P2987; L.BOROVČANIN:T.39456.

³⁴⁰⁸ P4960,p.2; P2987; L.BOROVČANIN:T.39456. *See* Srebrenica Narrative,para.36.

³⁴⁰⁹ P6475.

³⁴¹⁰ *See* J.ZAMETICA:T.42444.

we simply wish to question those men to find out whether some of them may have been responsible for those massacres [of Serb civilians in the region of Srebrenica]³⁴¹¹

933. Asked why "all the males" were being separated from their families, "not just a few", ZAMETICA answered: "we wish to carry out a thorough investigation",³⁴¹² then said that the process of assessing whether they had committed war crimes would take "days, maybe weeks, but certainly no longer than that."³⁴¹³ He claimed: "when the investigation is over, they will [...] be presented with a choice, either they [...] stay in their homes in Srebrenica [...] or if they so wish, they can go further".³⁴¹⁴ These were lies, as the evidence shows.³⁴¹⁵

(e) 13 July, Thousands of Muslim prisoners in the Bratunac area

934. On the morning of 13 July, BEARA issued instructions regarding the detention of Muslim men at Nova Kasaba. Told that Muslim men were killing themselves, he said: "excellent. Just let them continue, fuck it."³⁴¹⁶ By around 14:00, there were over 1,000 Muslim prisoners at Nova Kasaba under the control of the 65th ZMTP MP battalion.³⁴¹⁷

935. By 17:30 on 13 July, Bosnian Serb Forces had captured approximately 6,000 Muslim men from the column along the Bratunac–Konjević Polje–Milići Road.³⁴¹⁸ Approximately 1,500-2,000 men were detained at three major sites:³⁴¹⁹ Nova Kasaba, Konjević Polje and Sandići Meadow. From the moment of their capture, these men were marked for death.³⁴²⁰

³⁴¹¹ P6475,p.3.

³⁴¹² P6475,pp.3-4.

³⁴¹³ P6475,p.5.

³⁴¹⁴ P6475,pp.4-5.

³⁴¹⁵ See Srebrenica Narrative,paras.12-35.

³⁴¹⁶ D2204,p.2/P5354,p.3(partial duplicates); D2197.

³⁴¹⁷ P168,p.1. This information corresponds to an aerial image timed at around 14:00 which shows rows of what can only in the context have been Muslim PoWs at the Nova Kasaba football field.

P4308,pp.36-38. For reasons stated by R.BUTLER, SAVČIĆ's information about prisoner numbers at Nova Kasaba must have been as accurate an estimate as he was able to give at the time. R.BUTLER:T.27893-27894.

³⁴¹⁸ P4945/P5374,pp.1-4(partial duplicates). See also Srebrenica Narrative,para.36.

³⁴¹⁹ P4945/P5374,pp.1-4(partial duplicates). See also Srebrenica Narrative,paras.36-48.

³⁴²⁰ See KDZ333(Nova Kasaba-Branjevo Military Farm survivor); KDZ065(Konjević Polje-Jadar River survivor); KDZ064(Sandići Meadow – Orahovac survivor).

936. MLADIĆ spoke to prisoners at each location, giving them false assurances.³⁴²¹ Asked by Momir NIKOLIĆ what would happen to the men at Konjević Polje, he responded with a sweeping gesture across his waist with his right hand from left to right,³⁴²² an indication that they were to be killed.

(f) 13 July, MLADIĆ issued written order controlling access and information

937. At around 15:00 on 13 July, SAVČIĆ, Commander of the 65th ZMTP, transmitted to MALINIĆ,³⁴²³ MLADIĆ and GVERO, TOLIMIR's proposal to prohibit access "to all unauthorised individuals, filming and photographing of prisoners", prohibit traffic "for all United Nations vehicles en route Zvornik – Vlasenica" and to:

take measures to remove war prisoners from the main Milići – Zvornik road, place them somewhere indoors or in the area protected from sighting from the ground or the air.³⁴²⁴

938. Consistent with TOLIMIR's proposal, that afternoon, approximately 1,200 Muslim men were moved from Sandići Meadow to the relative cover of Kravica Warehouse, where they were executed.³⁴²⁵ At around 20:40, BOROVIČANIN reported to KRSTIĆ, his commander: "It's going well."³⁴²⁶

939. TOLIMIR's proposal was later approved by MLADIĆ,³⁴²⁷ and followed by his order 3/4-1638,³⁴²⁸ which closed main roads, strictly regulated access, and banned the entry of journalists and the provision of any information about prisoners.³⁴²⁹

³⁴²¹ See Srebrenica Narrative, paras.43,47.

³⁴²² M.NIKOLIĆ:D2081,para.9; M.NIKOLIĆ:T.24655-24657.

³⁴²³ Commander of the MP battalion at Nova Kasaba. See V.C.1.(c):VRS-GŠ units in the DK AOR.

³⁴²⁴ P168,p.1. D.GOJKOVIĆ typed and sent this document. D.GOJKOVIĆ:P248,pp.21-22,24,25; P346,pp.5-6. SAVČIĆ testified that he did not remember sending this document but that he could not "rule it out all together either". M.SAVČIĆ:T.42289. See also M.SAVČIĆ:D3918;para.57.

³⁴²⁵ See Srebrenica Narrative, paras.54-58,64. In addition, on 13 July POPOVIĆ destroyed photos taken of the prisoners at Nova Kasaba. Z.BAJAGIĆ:T.41149-41151,41153-41154; V.POPOVIĆ:T.43040-43043.

³⁴²⁶ P4946.

³⁴²⁷ TOLIMIR's proposal was to be "approved by the Commander of the GŠVRS". P168,para.4. SAVČIĆ gave various spurious reasons as to why TOLIMIR's proposal was not connected to a plan to kill the men. M.SAVČIĆ:D3918,paras.56-74; M.SAVČIĆ:T.42292-42298,42306-42308,42341-42345. For example, he suggested a large group of prisoners in the open could have been mistaken for a tactical group and attacked by NATO planes. M.SAVČIĆ:D3918,para.73. See also DCC(M.SAVČIĆ).

³⁴²⁸ P4407(received by at least one recipient (the 2nd Romanija Motorised Brigade) at around 22:00, per the times on the delivery stamp on the bottom right of the B/C/S original).

940. These were measures to ensure that the murder operation could be carried out in secret.³⁴³⁰

(g) 13 July, KOVAČ met with MLADIĆ

941. From about 15:50 to 16:10 on 13 July, KOVAČ met with **KARADŽIĆ** in Pale,³⁴³¹ then travelled to the "field",³⁴³² where he met with MLADIĆ in Vlasenica.³⁴³³ KOVAČ and BAJAGIĆ gave different accounts of the location and nature of KOVAČ's meeting with MLADIĆ, but both agreed that they met.³⁴³⁴ BAJAGIĆ "assumed that as two commanders, commander of the Serbian Army and the commander of the Serbian police, [they] had something to talk about".³⁴³⁵

942. KOVAČ later spent the night at Hotel Vidikovac³⁴³⁶ in Zvornik,³⁴³⁷ then on 14 July, travelled from Zvornik to Bratunac,³⁴³⁸ where he met with VASIĆ.³⁴³⁹ Mane ĐURIĆ(KW117), VASIĆ's deputy, was also at Hotel Vidikovac on the morning of 14 July.³⁴⁴⁰ In Bratunac, VASIĆ and KOVAČ met with BOROVIČANIN, and they all

³⁴²⁹ P4407. Consistent with this order, on 14 July, TOLIMIR ordered all units to be on the alert for, and destroy, a spy plane (an unmanned aircraft) identified in the DK zone. P5101. GVERO ordered the DK to use all available manpower to discover, block, disarm and capture Muslim men and place them in "appropriate facilities that can be secured by fewer troops"(P4532,p.1) which ŽIVANOVIĆ followed with an order to all DK subordinate units in almost identical terms. P5100(requiring cooperation with the "competent authorities" and the MUP (p.2); see timestamps reading 16:00 and 17:20 (p.3)).

³⁴³⁰ See also P4439.

³⁴³¹ P2242,p.91.

³⁴³² T.KOVAČ:T.42767,42792-42793. See also T.KOVAČ:D3960,para.117.

³⁴³³ T.KOVAČ:T.42767-42771; T.KOVAČ:D3960,paras.117-118; Z.BAJAGIĆ:T.41161-41163.

³⁴³⁴ KOVAČ said he was *en route* from Pale to Bijeljina and stopped at the checkpoint in Vlasenica, then taken to the DK Command to meet MLADIĆ. T.KOVAČ:T.42770-42771; T.KOVAČ:D3960,paras.117-118. BAJAGIĆ said that MLADIĆ and KOVAČ met at his house, after MLADIĆ sent BAJAGIĆ to find KOVAČ whom he was told was in Vlasenica; it was a "short encounter". Z.BAJAGIĆ:T.41161-41162.

³⁴³⁵ Z.BAJAGIĆ:T.41162-41163.

³⁴³⁶ KOVAČ said that Hotel Vidikovac was used by the MUP for organisation of the procurement of ammunition, fuel, food and other supplies. T.KOVAČ:T.42772.

³⁴³⁷ T.KOVAČ:D3960,para.119; T.KOVAČ:T.42772. KOVAČ testified that he left Vlasenica at around 18:30, arrived in Konjević Polje at about 19:30, continued to Bijeljina, then returned to Hotel Vidikovac in Zvornik during the night. T.KOVAČ:D3960,para.119.

³⁴³⁸ T.KOVAČ:D3960,para.120; T.KOVAČ:T.42777.

³⁴³⁹ KOVAČ said in his statement that he travelled from Zvornik to Bratunac with VASIĆ but in cross-examination that he "picked up" BOROVIČANIN and VASIĆ in Bratunac and then went to Srebrenica with them. D3960,para.120; T.KOVAČ:T.42786-42787. See also T.KOVAČ:T.42777; Lj.BOROVIČANIN:D3659,para.40. The evidence is clear that VASIĆ was in Bratunac on the night of 13/14 July. See V.G.2.(i):13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

³⁴⁴⁰ M.ĐURIĆ(KW117):T.35041.

visited Srebrenica together.³⁴⁴¹ According to KOVAČ, BOROVIČANIN told him that an "incident" had occurred at Kravica Warehouse; one of BOROVIČANIN's men had been killed and another wounded by a Muslim prisoner as a result of which "several" Muslim men were "liquidated" by the "special policemen".³⁴⁴² In fact, BOROVIČANIN's subordinates had massacred approximately 1,200 Muslim men at Kravica Warehouse on the previous day.³⁴⁴³

943. KOVAČ returned to Pale on the night of 14 July, and met with KARADŽIĆ again at 22:45.³⁴⁴⁴

944. The only reasonable inference, as is clear from the sequence of events which followed KOVAČ's meeting with KARADŽIĆ on 13 July, is that KOVAČ travelled to Vlasenica on KARADŽIĆ's orders, to arrange with MLADIĆ logistics for the murder operation, and then reported back. On 13 July, after KOVAČ's meeting with KARADŽIĆ:

- KOVAČ met MLADIĆ in Vlasenica;³⁴⁴⁵
- KARADŽIĆ spoke to MLADIĆ directly by phone;³⁴⁴⁶
- MLADIĆ gave written instructions to conceal activities in the Bratunac area;³⁴⁴⁷
- KARADŽIĆ [REDACTED] gave orders about the movement of prisoners to Zvornik to be killed there, and were plainly acting in concert in doing so;³⁴⁴⁸
- KARADŽIĆ's subordinates from among the RS MUP, VRS and civilian authorities—BEARA, VASIĆ, DERONJIĆ and M.NIKOLIĆ—met in

³⁴⁴¹ T.KOVAČ:D3960,para.120; T.KOVAČ:T.42777,42787,42793;

Lj.BOROVIČANIN:D3659,paras.40,42. *See also* P667,00:27:21-00:27:50,00:42:42-00:46:28,pp.17,23.

³⁴⁴² T.KOVAČ:T.42790-42791.

³⁴⁴³ *See* Srebrenica Narrative, paras.54-58,64. KOVAČ conceded that the MUP could "never wash itself" from the killings at Kravica Warehouse. T.KOVAČ:T.42791.

³⁴⁴⁴ P2242,p.91; T.KOVAČ:T.42792-42793.

³⁴⁴⁵ *See* V.G.2.(g):13 July, KOVAČ met with MLADIĆ.

³⁴⁴⁶ *See* V.G.2.(h):13 July, MLADIĆ reported to KARADŽIĆ that Srebrenica was done.

³⁴⁴⁷ *See* V.G.2.(f):13 July, MLADIĆ issued written order controlling access and information.

³⁴⁴⁸ *See* V.G.2.(i):13 July, KARADŽIĆ ordered that prisoners be transferred to Zvornik.

Bratunac that night to discuss and arrange logistics for the murder operation;³⁴⁴⁹

- The first Muslim prisoners travelled from Bratunac to Zvornik that night.³⁴⁵⁰

945. On the morning of 14 July, the rest of the Muslim prisoners travelled from Bratunac to Zvornik, secured by members of the RS MUP.³⁴⁵¹

946. KOVAČ gave dishonest and utterly implausible evidence about his meetings with **KARADŽIĆ** on 13 and 14 July, the reasons why he travelled to the field on 13 July, and the substance of his meeting with MLADIĆ. He claimed that: (a) **KARADŽIĆ** did not send him to the field, rather, he chose to go himself to the Srebrenica area to set up a police station;³⁴⁵² (b) MLADIĆ was drunk when they met, and it was "impossible to discuss anything" with him;³⁴⁵³ and (c) he and **KARADŽIĆ** only ever talked about Sarajevo, not Srebrenica.³⁴⁵⁴

947. However, it is inconceivable, given KOVAČ's movements between the two meetings on 13 and 14 July, and the striking sequence of events occurring within that time-frame, that he and **KARADŽIĆ** would have talked about anything other than Srebrenica at their meetings on 13 and 14 July,³⁴⁵⁵ that he and MLADIĆ would have talked about anything other than logistics for the murder operation when they met on 13 July, or that he travelled to the field for any purpose other than to meet with MLADIĆ to arrange logistics for the murder operation, and then report back to **KARADŽIĆ**.

948. The only reasonable inference is that on 14 July, KOVAČ reported back to **KARADŽIĆ** about the murder operation, his meetings with MLADIĆ, BOROČANIN and VASIĆ, what he had seen and heard in the Srebrenica, Bratunac

³⁴⁴⁹ See V.G.2.(i):13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik; V.G.2.(j):13 July, BEARA sent Momir NIKOLIĆ to Drago NIKOLIĆ.

³⁴⁵⁰ See V.G.2.(i):13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

³⁴⁵¹ See Srebrenica Narrative, para.96.

³⁴⁵² T.KOVAČ:T.42767,42792-42793. See also P2994; P2995,p.2.

³⁴⁵³ T.KOVAČ:T.42770-42771; T.KOVAČ:D3960,paras.117-118.

³⁴⁵⁴ T.KOVAČ:D3960,paras.117,129-131; T.KOVAČ:T.42764-42766,42793-42794.

³⁴⁵⁵ KOVAČ had also received written reports on 13 July from KIJAC, BOROČANIN and VASIĆ. P4389; P2987,p.2; P4942; T.KOVAČ:T.42754-42755,42759-42761,42765; C.NIELSEN:T.16322-16323.

and Zvornik areas, and most significantly the implementation of **KARADŽIĆ**'s order to move the prisoners to Zvornik.

(h) 13 July, MLADIĆ reported to **KARADŽIĆ** that Srebrenica was done

949. At some time between 17:00 and 18:40 on 13 July,³⁴⁵⁶ **KARADŽIĆ** spoke with MLADIĆ by telephone.³⁴⁵⁷

950. MLADIĆ reported that Srebrenica was "done".³⁴⁵⁸ They discussed the Žepa campaign as the next step³⁴⁵⁹ and the promotion of a commander who, by the description, was KRSTIĆ.³⁴⁶⁰ **KARADŽIĆ** said words to the effect of "[t]he war is over", "[t]hey'll bring us [a] deal",³⁴⁶¹ and ended the call: "Thank you, General MLADIĆ".³⁴⁶²

951. This call took place during a 13 July meeting at **KARADŽIĆ**'s office, attended by Tomislav PREMOVIĆ, Slavica RISTIĆ and Srđa TRIFKOVIĆ.³⁴⁶³ Everyone knew it was MLADIĆ on the phone.³⁴⁶⁴

952. The transportation of Muslim civilians from Potočari began at about 12:40 on 12 July.³⁴⁶⁵ When MLADIĆ made the statement that Srebrenica was "done," he was

³⁴⁵⁶ The telephone call took place during a meeting on 13 July between 17:00 and 18:40 attended by S.TRIFKOVIĆ, T.PREMOVIĆ and S.RISTIĆ:P2242,p.91. *See also* S.RISTIĆ:P4556,pp.31,34-35,41-43; S.RISTIĆ:T.26071-26076; P4557,pp.3-4; P4560.

³⁴⁵⁷ S.RISTIĆ:P4556,pp.34-47,50; S.RISTIĆ:T.26071-26074; T.PREMOVIĆ:P4911,pp.48,54,61-66,71-72,79; T.PREMOVIĆ:T.27414-27415.

³⁴⁵⁸ S.RISTIĆ:T.26073-26074,26076-26077; S.RISTIĆ:P4556,pp.35-38,41.

³⁴⁵⁹ S.RISTIĆ:P4556,pp.37-39; S.RISTIĆ:T.26087-26088.

³⁴⁶⁰ T.PREMOVIĆ:P4911,pp.61-63; T.PREMOVIĆ:T.27414-27415.

³⁴⁶¹ S.RISTIĆ:P4556,pp.37-38; S.RISTIĆ:T.26077-26078. PREMOVIĆ suggested the conversation centred on the fall of Žepa, however, he was obviously mistaken as Žepa did not fall until later in July. *See* T.PREMOVIĆ:P4911,pp.62-64. *See also* P5193,p.3; P2282,pp.1-3,7-16.

³⁴⁶² S.RISTIĆ:P4556,p.47.

³⁴⁶³ P2242,p.91.

³⁴⁶⁴ T.PREMOVIĆ:P4911, pp.61-64,73; T.PREMOVIĆ:T.27406,27414-27415,27417-27419. Defence witness S.TRIFKOVIĆ gave evidence that **KARADŽIĆ** did not speak to MLADIĆ during this meeting, but "someone from the VRS command". D2905,paras.29-31. TRIFKOVIĆ was not a credible or reliable witness. His evidence on this issue should be dismissed. *See* DCC(S.TRIFKOVIĆ). There is no reason to doubt the evidence of Prosecution witnesses T.PREMOVIĆ and S.RISTIĆ that **KARADŽIĆ** and MLADIĆ spoke on the phone.

³⁴⁶⁵ *See* Srebrenica Narrative,para.14.

reporting to **KARADŽIĆ** about the forcible removal operation, which by the evening of 13 July was completed.³⁴⁶⁶

953. **KARADŽIĆ**'s conversation with MLADIĆ is corroborated by evidence that some time before 20:00 on 13 July 1995, KRSTIĆ, in the presence of MLADIĆ, assumed command of the VRS DK from ŽIVANOVIĆ.³⁴⁶⁷ On 14 July, **KARADŽIĆ** met ŠKRBIĆ and signed a formal Presidential Decree on KRSTIĆ's promotion to Corps Commander, which was referenced—though not numbered—in the DK handover document of 13 July, indicating that MLADIĆ knew that **KARADŽIĆ** would be signing a Decree.³⁴⁶⁸

954. Within one or two hours of this conversation taking place, MLADIĆ and **KARADŽIĆ** both gave orders to move the Muslim prisoners then in Bratunac to Zvornik, where they were to be killed.³⁴⁶⁹ The plain inference is that they were acting in concert in doing so.

(i) 13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik

955. Some time before 19:00 on 13 July, MLADIĆ gave an order that the Muslim prisoners in Bratunac were to be brought to Zvornik to be shot.³⁴⁷⁰ This order was communicated down the VRS chain of command, as evidenced by a telephone call between Drago NIKOLIĆ and POPOVIĆ at about 19:00.³⁴⁷¹

[REDACTED]

³⁴⁶⁶ JANKOVIĆ reported that the "evacuation" of the "entire Muslim population" was completed at 20:00. P166; AF1586; E.RAVE:P3995,para.116(between 6-8pm); C.SCHMITZ: P4752, para.56(4pm). See also [REDACTED]; J.KINGORI:P4140,paras.195-196,198; P4160(13 July UNMO Report at 8.45pm); R.FRANKEN:P4175,para.98.

³⁴⁶⁷ P4485(the received stamp on this document bears the time 20:00, suggesting that the ceremony for KRSTIĆ's promotion occurred before 20:00 on 13 July 1995).

³⁴⁶⁸ P3044; P2242,p.91. See also P.ŠKRBIĆ:T.25977-25978; P4523,pp.23-25,79-82; R.BUTLER:P4913,paras.4.0-4.5. See also P5085.

³⁴⁶⁹ See V.G.2.(i):13 July, **KARADŽIĆ** ordered that prisoners be transferred to Zvornik.

³⁴⁷⁰ [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] Momir NIKOLIĆ arrived at around 21:45, sent by BEARA.³⁴⁷⁵

[REDACTED]
[REDACTED]
[REDACTED]

959. At 20:10, **KARADŽIĆ** spoke to DERONJIĆ *via* an intermediary and ordered that the thousands of Muslim prisoners then in Bratunac were to be moved to detention facilities in Zvornik.³⁴⁷⁸ **KARADŽIĆ** has conceded on the record that this call took place.³⁴⁷⁹

960. DERONJIĆ informed **KARADŽIĆ** that approximately 2,000 men were being held in Bratunac and more were expected throughout the night.³⁴⁸⁰ **KARADŽIĆ** stated (through an intermediary): "[a]ll the goods must be placed inside the warehouses before twelve tomorrow" and DERONJIĆ was told "not in the warehouses /?over there/, but somewhere else."³⁴⁸¹ DERONJIĆ acknowledged this instruction saying, "understood".³⁴⁸²

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3475 See V.G.2.(j):13 July, BEARA sent Momir NIKOLIĆ to Drago NIKOLIĆ.

3476 [REDACTED] D.NIKOLIĆ was relieved of his duty at the IKM at 23:00 by Major GALIĆ (not TALIĆ):P4582,p.6.

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3478 P6692.

3479 See T.24491(**KARADŽIĆ** questioning M.KATANIĆ). See also T.24410(**KARADŽIĆ** questioning S.DAVIDOVIĆ). KDZ126 confirmed he recorded the conversation in a handwritten note. KDZ126:T.26400-26404.

³⁴⁸⁰ BUTLER testified that DERONJIĆ's statement that there were 2,000 prisoners then in Bratunac and that more were expected reflected the situation as it was unfolding that evening. As the evening wore on, additional thousands of prisoners were brought in from places like Nova Kasaba and Konjević Polje. R.BUTLER:T.27558-27559.

³⁴⁸¹ P6692,p.1 .

³⁴⁸² P6692,p.1.

961. **KARADŽIĆ**'s concern was to keep the murder operation secret and out of sight of the UN and international organisations then in, or waiting to gain access to the Bratunac area.³⁴⁸³ It is clear that he was talking about prisoners and detention facilities, and that he was using code to conceal this fact.

962. In ordering DERONJIĆ that prisoners were to be placed inside detention facilities "somewhere else",³⁴⁸⁴ as the evidence shows, **KARADŽIĆ** was referring to Zvornik. The use of code to refer to Zvornik, in combination with the movement of the first convoy of prisoners to Zvornik that night, supports an inference that it was by then known to **KARADŽIĆ**'s subordinates that Zvornik was selected as the alternative location for execution of the Muslim men. **KARADŽIĆ**'s order to DERONJIĆ signified that the Muslim men had to be concealed there by midday the following day.

963. DERONJIĆ's role was to ensure that **KARADŽIĆ**'s subordinates in the MUP and VRS³⁴⁸⁵ move the Muslim prisoners then in Bratunac to Zvornik, and this is what then happened. The first convoy of prisoners set off for Zvornik that night, at around 20:00 or 21:00.³⁴⁸⁶ The rest followed, in a huge convoy, on the morning of 14 July.³⁴⁸⁷

964. There was no legitimate explanation for moving the prisoners to Zvornik to be held in schools there. If the intention was to exchange them, then they could have been taken to Batković camp.³⁴⁸⁸ **KARADŽIĆ**'s use of code ("goods"; "somewhere else", "warehouses") in his instructions to DERONJIĆ overwhelmingly supports an inference that his intentions were malign.

965. DERONJIĆ and **KARADŽIĆ**'s subordinates in the VRS and MUP—BEARA and VASIĆ³⁴⁸⁹—met at the SDS offices in Bratunac later that night.³⁴⁹⁰ At this

³⁴⁸³ P4160; P166; P667,00:24:39-00:25:06.

³⁴⁸⁴ P6692,p.1.

³⁴⁸⁵ Compare **KARADŽIĆ**'s earlier decision by which he ordered DERONJIĆ to "ensure that all civilian and military organs treat all citizens who participated in combat [...] as prisoners of war"(emphasis added). D2055.

³⁴⁸⁶ KDZ039:P3940,pp.28-30. See also M.NIKOLIĆ:T.24671-24672.

³⁴⁸⁷ See Srebrenica Narrative,para.96.

³⁴⁸⁸ Upon receiving instructions, the Batković camp made preparations to accommodate 1,000-1,200 men from Srebrenica. The camp was later told that these men would not be arriving. M.TODOROVIĆ:D4124,pp.17-18,21-23,37,66-67; M.TODOROVIĆ:T.44189-44190,44193-44194.

³⁴⁸⁹ M.NIKOLIĆ:T.24676-24677; M.NIKOLIĆ:D2081,pp.6-7.

³⁴⁹⁰ NIKOLIĆ testified this was around midnight. M.NIKOLIĆ:T.24676,24678; M.NIKOLIĆ:D2081,pp.6-7. BOROVIČANIN corroborated M.NIKOLIĆ's evidence about this meeting,

meeting, DERONJIĆ said that the prisoners should be taken to Zvornik and that those were the instructions he had received from **KARADŽIĆ**.³⁴⁹¹ While BEARA wanted to kill them in Bratunac,³⁴⁹² DERONJIĆ said "he had enough problems".³⁴⁹³ BEARA and DERONJIĆ agreed that the prisoners would be moved to Zvornik,³⁴⁹⁴ just as **KARADŽIĆ** had ordered. The fate of the prisoners was at this time certain.³⁴⁹⁵

966. As the combination of events on the late afternoon and night of 13 July shows, **KARADŽIĆ** and his subordinate, MLADIĆ, were directing the murder operation in concert, and in agreement that the Bosnian Muslim men were to be moved to Zvornik to be killed.

(j) 13 July, BEARA sent Momir NIKOLIĆ to Drago NIKOLIĆ

967. At about 20:00-20:30,³⁴⁹⁶ Momir NIKOLIĆ met BEARA in Bratunac town. BEARA ordered Momir NIKOLIĆ to go to Zvornik to convey to Drago NIKOLIĆ the decision that the prisoners in Bratunac were to be transferred to the Zvornik Brigade's AOR to be killed.³⁴⁹⁷ Momir NIKOLIĆ thereafter drove to the Zvornik Brigade Command and thence to the IKM where he delivered BEARA's order to Drago NIKOLIĆ at around 21:45. He then returned to Bratunac and reported to BEARA.³⁴⁹⁸

968. At some point late in the evening of 13 July, a detachment of military police from the Zvornik Brigade was dispatched to Orahovac.³⁴⁹⁹ Between 00:00 and 02:00 on 13/14 July, the buses carrying Muslim prisoners arrived.³⁵⁰⁰

which he said took place sometime after 20:00 at the Bratunac Brigade Headquarters. Lj.BOROVČANIN:T.39442. See also Lj.BOROVČANIN:D3659,para.35; Lj.BOROVČANIN:T.39439-39441.

³⁴⁹¹ M.NIKOLIĆ:T.24676-24680. See also M.KATANIĆ:P4374,paras.83,91,93; M.KATANIĆ:T.24496,24499-24504; P4384.

³⁴⁹² M.NIKOLIĆ:T.24676-24680(this was, according to NIKOLIĆ, in spite of BEARA having earlier ordered him to go to Zvornik with orders that prisoners would be transferred there from Bratunac).

³⁴⁹³ M.NIKOLIĆ:T.24878-24879.

³⁴⁹⁴ M.NIKOLIĆ:T.24678,24876.

³⁴⁹⁵ BEARA and DERONJIĆ's discussion concerned where, not if, they were to be killed.

M.NIKOLIĆ:T.24678,24878.

³⁴⁹⁶ M.NIKOLIĆ:T.24666-24667,24679; M.NIKOLIĆ:D2081,p.6.

³⁴⁹⁷ M.NIKOLIĆ:T.24668-24669; M.NIKOLIĆ:D2081,p.6.

³⁴⁹⁸ M.NIKOLIĆ:T.24670-24671,24676; M.NIKOLIĆ:D2081,p.6.

³⁴⁹⁹ AF1754; R.BUTLER:T.27560-27564; P4947,p.2. See also P4948;

³⁵⁰⁰ KDZ039:P3940,p.30.

(k) 13 July, DERONJIĆ and BEARA arranged logistics for burials

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 3501 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

970. Some time after 21:00, KDZ107 met BEARA at the SDS offices in Bratunac. BEARA instructed KDZ107 to deliver machinery to Milići, because "a lot of dead" needed to be buried. At around 01:00 or 02:00 on 14 July, KDZ107 met BEARA again, and was taken by a MP to Glogova, where a grave was to be dug. At around 09:00 on the following day, KDZ107 returned to Glogova with his crew. They dug graves using equipment from the state-owned Ciglana/brickworks company (in Bratunac) and from Zvornik.³⁵⁰³ Equipment from the Ciglana was secured after Srbslav DAVIDOVIĆ called the Director, Nedo NIKOLIĆ. DAVIDOVIĆ realised that the machinery would be used to bury bodies at Kravica Warehouse, having been told that morning about the murder of hundreds of Muslims there.³⁵⁰⁴

(l) 14 July, BEARA, POPOVIĆ and D.NIKOLIĆ organised executions in the Zvornik area

971. On the morning of 14 July, BEARA, POPOVIĆ and D.NIKOLIĆ met at the Zvornik Brigade HQ (the Standard barracks).³⁵⁰⁵ At this time, they each knew of the

³⁵⁰¹ [REDACTED]

³⁵⁰² [REDACTED]

³⁵⁰³ KDZ107:P345,pp.9,12-19,22-24; S.DAVIDOVIĆ:P4100,pp.50-60,92-93; S.DAVIDOVIĆ:T.24364-24365; [REDACTED]. *See also* N.NIKOLIĆ:T.39816. BEARA and MITROVIĆ, President of Zvornik municipality, discussed obtaining a bulldozer to be sent to Bratunac at the time of the burials. P4585-ENG2,p.34. *See also* [REDACTED].

³⁵⁰⁴ S.DAVIDOVIĆ:P4100,pp.50-60,92-93; S.DAVIDOVIĆ:T.24364-24365. DAVIDOVIĆ was told this by Jovan NIKOLIĆ and Dragan NIKOLIĆ, directors of the cooperative in Kravica. S.DAVIDOVIĆ:P4100,pp.49-50,60-61. *See also* N.NIKOLIĆ:T.39816.

³⁵⁰⁵ M.BIRČAKOVIĆ:P360,pp.5,7-9; P4585-ENG2,p.38. Major Pavle GOLJIĆ was Assistant Chief of Intelligence at the DK. P4920,p.2.

plan to murder the Muslim men from Srebrenica and had significantly contributed to its implementation.³⁵⁰⁶ Given the circumstances and the identities of the participants, this meeting was held to organise and coordinate the detention and execution of the Muslim prisoners.

972. After his meeting with BEARA and D.NIKOLIĆ, POPOVIĆ led a convoy of vehicles transporting thousands of Bosnian Muslim men who had been detained at various locations around Bratunac to Zvornik.³⁵⁰⁷ POPOVIĆ accompanied the vehicles to Orahovac School, where he oversaw the organisation of the detention of the prisoners and their murder later that day.³⁵⁰⁸ D.NIKOLIĆ and MP BIRČAKOVIĆ drove to the Vidikovac Hotel, about two kilometres from Zvornik, to meet part of the prisoner convoy.³⁵⁰⁹ D.NIKOLIĆ instructed BIRČAKOVIĆ to get on the first bus and go to Orahovac, which he did.³⁵¹⁰ Civilian policemen provided security on the buses from Bratunac, and assisted in putting the prisoners into Orahovac School.³⁵¹¹

973. Throughout the day of 14 July, D.NIKOLIĆ had various meetings at Orahovac School with JASIKOVAC and senior VRS officers.³⁵¹² BEARA was also seen at the school.³⁵¹³ By the time POPOVIĆ arrived, Zvornik Brigade MPs were positioned around the school, providing security.³⁵¹⁴ In the afternoon, D.NIKOLIĆ's deputy, TRBIĆ, requested and secured reinforcements from the Zvornik Brigade's 4th Battalion to assist with the guarding and execution of prisoners held at the school.³⁵¹⁵ BEARA, POPOVIĆ and D.NIKOLIĆ continued to coordinate and oversee the ongoing detention and murder of prisoners at Petkovci and Ročević School. On the evening of 14 July, Marko MILOŠEVIĆ went to the crossroads adjacent to the Petkovci School to find BEARA and delivered a message to him that BEARA was to report to the brigade command.³⁵¹⁶ D.NIKOLIĆ was seen with BEARA, together with

³⁵⁰⁶ See V.G.2.(i)-(k).

³⁵⁰⁷ See Srebrenica Narrative, para.96.

³⁵⁰⁸ KW582:D4291, pp.60-63; V.POPOVIĆ:D3993, paras.47-51; V.POPOVIĆ:T.43062-43066.

³⁵⁰⁹ M.BIRČAKOVIĆ:P360, pp.11-13.

³⁵¹⁰ M.BIRČAKOVIĆ:P360, pp.12,48-49.

³⁵¹¹ KDZ407:P379, pp.9,12,38-39; M.BIRČAKOVIĆ:P360, pp.12-15,70,106,133-134,137-138.

³⁵¹² M.BIRČAKOVIĆ:P360, pp.16-17; KDZ407:P379, pp.14-15; T.TANIĆ:P369, p.19.

³⁵¹³ N.STOJANOVIĆ:D2266, pp.27,39,43. See also P4585-ENG2, p.42("1500 hrs. – Colonel BEARA is coming in order to Orovoc Petkovci Ročević Pilica"). "Orovoc" is clearly a misspelling of "Orahovac".

³⁵¹⁴ M.BIRČAKOVIĆ:P360, pp.15-19,70-71; T.TANIĆ:P369, pp.19-20; KDZ064:P769, p.84;

[REDACTED]; AF1772.

[REDACTED] AF1773, AF1774.

³⁵¹⁶ O.STANIŠIĆ:P382, pp.14-15,60.

troops and military police as well as trucks and buses, at the Petkovci School.³⁵¹⁷ The presence of vehicles and the deployment of soldiers around the school clearly indicates that the Muslim prisoners had already arrived from Bratunac and were inside the school.

974. At 21:02 on 14 July, the Zvornik Brigade duty officer informed BEARA, who was then in Bratunac, that there were problems with prisoners.³⁵¹⁸ He was asked to "urgently" call extension 155, MILETIĆ's extension at the VRS GŠ.³⁵¹⁹ JOKIĆ reported:

There are big problems. Well with the people, I mean, with the parcel [...] Drago is nowhere around.³⁵²⁰

975. This call, and the reference to D.NIKOLIĆ in the context of prisoners, indicates that both BEARA and NIKOLIĆ were involved in coordinating and overseeing the ongoing detention and murder of the prisoners at this time.

976. At 22:27, JOKIĆ, Zvornik Brigade duty officer, reported to MILETIĆ, the problems they were having with the column of Muslim men: "there is a large group going this way". The police were "nowhere to be seen".³⁵²¹ He reported: "OBRENOVIĆ is really engaged to the hilt [...] this package really did for us... we've been reporting about the number of people since this morning" to which MILETIĆ responded: "Go to VASIĆ",³⁵²² meaning the Chief of the Zvornik CJB.³⁵²³

977. On the morning of 15 July, BEARA was working at the Zvornik Brigade HQ,³⁵²⁴ looking for men to execute 3,500 Muslim men ("parcels").³⁵²⁵ At 09:54, he

³⁵¹⁷ P4585-ENG2,p.42; V.POPOVIĆ:T.43074-43075; O.STANIŠIĆ:P382,pp.14-15.

³⁵¹⁸ P5070. *See also* S.FREASE:T.26721("Badem" is the codename for the Bratunac Brigade); R.BUTLER:T.27438,27567.

³⁵¹⁹ Extension 155 was the VRS-GŠ telephone extension used by General MILETIĆ and the VRS-GŠ Administration for Operations and Training. R.BUTLER:T.27568; L.OBRADOVIĆ:P4444,pp.65-66.

³⁵²⁰ P5070,p.1. *See also* P4585-ENG2,p.52(entry by JOKIĆ: "BEARA to call 155").

³⁵²¹ P5071,p.1(intercept of conversation between MILETIĆ and JOKIĆ on 14 July). The intercept incorrectly identifies MILETIĆ as "General VILOTIĆ". R.BUTLER:T.27571;

[REDACTED]. JOKIĆ's comment that they were waiting for reinforcements from "the blues" is a clear reference to the blue uniformed civilian police, particularly since MILETIĆ's response was to take the matter up with VASIĆ. *See also* KDZ407:P379,pp.9,12,38-39(referring to the blue uniforms of the civilian police); M.BIRČAKOVIĆ:P360, pp.106,133-134.

³⁵²² P5071,p.2.

³⁵²³ *See* V.C.2.(a): Structure of the RS MUP in the DK zone.

³⁵²⁴ P4585-ENG2,p.54("0900 BEARA is coming"); P5072("Colonel BEARA was looking for General ŽIVANOVIĆ, but he was not there. He said he was to call him at ext.139"). Extension 139 was the Zvornik Brigade HQ extension for D.NIKOLIĆ. *See* R.BUTLER:T.27575; P4568,p.7.

spoke to ŽIVANOVIĆ asking for at least half a platoon. ŽIVANOVIĆ instructed him to call the DK.³⁵²⁶ Shortly after, BEARA was intercepted talking to KRSTIĆ, asking for 30 men because FURTULA had not carried out "the boss's order".³⁵²⁷

978. BEARA's reference to the "boss's order" here is clearly a reference to MLADIĆ.³⁵²⁸ KRSTIĆ was at this time commanding the attack on Žepa³⁵²⁹ and did not have troops to spare to assist BEARA, saying to him, "I can't pull anything out of here for you".³⁵³⁰ KRSTIĆ told BEARA to check with BLAGOJEVIĆ, and also M.NASTIĆ³⁵³¹, and then to "take those MUP men" from "up there", meaning the Zvornik area.³⁵³² BEARA responded that the MUP "won't do anything", and told KRSTIĆ:

I don't know what to do. I mean it, Krle. There are still 3,500 "parcels" that I have to distribute and I have no solution.³⁵³³

979. By "3,500 parcels" BEARA was referring to the Muslim prisoners being held at the Ročević School, the Kula School in Pilica and the Pilica Cultural Centre, who were still to be executed.³⁵³⁴ KRSTIĆ responded by saying "Fuck it, I'll see what I can do", and the conversation ended.³⁵³⁵ BEARA's reference to 3,500 parcels is supported by the numbers of individuals identified in the primary and secondary graves linked to the Kozluk and Branjevo Farm executions. As of January 2012 the remains of 2,550 victims had been identified from those graves.³⁵³⁶ This conversation

³⁵²⁵ P5074,p.1.

³⁵²⁶ P5073(ŽIVANOVIĆ instructs BEARA to call "Zlatar and 385"). "Zlatar" was the telephonic code name for the DK; extension 385 is associated with the DK Command Post. *See* R.BUTLER:P4914,para.10.24. ŽIVANOVIĆ was no longer DK commander at this time. *See* V.C.1.(b):DK.

³⁵²⁷ P5074. A reference to Radomir FURTULA, then commander of the 5th Podrinje Light Infantry Brigade. *See* V.BLAGOJEVIĆ:T.45073; R.BUTLER:T.27576; P4920,p.2.

³⁵²⁸ The only person in the command chain for the *Krivaja-95* operation who would be "the boss" for both KRSTIĆ and BEARA. *See* V.C.1.(a):VRS-GŠ; V.C.1.(b):DK.

³⁵²⁹ P5106; P4073,p.1; P4941,p.34(KRSTIĆ signs statement that "Žepa is also Serbian").

³⁵³⁰ P5074.

³⁵³¹ V.BLAGOJEVIĆ:T.45073-45074; P4920,p.2.

³⁵³² P5074,p.1.

³⁵³³ P5074,p.1.

³⁵³⁴ JOKIĆ's slip of the tongue in a previous intercept shows that "parcel" was the codename for "people". P5070,p.1("These are big problems. Well with the people, I mean, with the parcel."). *See also*

³⁵³⁵ P5074,p.1. *See* [REDACTED] P5392,p.2(POPOVIĆ said "we had some parcels"). *See* Srebrenica Narrative,paras.121,126,131-132.

³⁵³⁵ P5074,p.1. *See* [REDACTED].

³⁵³⁶ D.JANC:P4772,pp.40-42.

shows that BEARA was organising troops to carry out the killing operation in the Pilica and Ročević areas and that he turned to KRSTIĆ for assistance.

(m) 14 July, MUP secure transport of the convoy of prisoners to Zvornik

980. Mane ĐURIĆ was at Hotel Vidikovac in Zvornik when the convoy of Muslim prisoners arrived from Bratunac on 14 July.³⁵³⁷ KOVAČ was also in Zvornik when the convoy arrived.³⁵³⁸ VASIĆ, KOVAČ's subordinate, had been in Bratunac the night before meeting with DERONJIĆ and BEARA, when DERONJIĆ told BEARA about KARADŽIĆ's order to move the Muslim prisoners then in Bratunac to Zvornik, where they would be killed.³⁵³⁹

981. Given the sequence of events prior to the arrival of both the convoy and KOVAČ in Zvornik, the only reasonable inference is that KOVAČ was in Zvornik arranging logistics for the murder operation; at the very least ensuring the secure transport of the convoy of prisoners from Bratunac, past Hotel Vidikovac, and onwards to detention facilities in the Zvornik area, as ordered by KARADŽIĆ the day before.³⁵⁴⁰

982. This inference is further compelled by the facts that civilian policemen were on the buses providing security from Bratunac to Zvornik, and onwards to the detention sites³⁵⁴¹ and that the 6th Zvornik PJP Company secured the Drinjača – Han Pijesak road,³⁵⁴² along which the convoy travelled. Further, civilian policemen who secured the buses to Orahovac assisted in putting prisoners in the school.³⁵⁴³ Civilian police were also stationed in Orahovac on 14 July.³⁵⁴⁴

³⁵³⁷ M.ĐURIĆ(KW117):T.35041-35043. See also M.ĐURIĆ(KW117):T.35081-35082.

³⁵³⁸ T.KOVAČ:D3960,para.126; T.KOVAČ:T.42776.

³⁵³⁹ See V.G.2.(i):13 July, KARADŽIĆ ordered that prisoners be transferred to Zvornik.

³⁵⁴⁰ P6692.

³⁵⁴¹ See Srebrenica Narrative,paras.40,81,98,121.

³⁵⁴² P4949,p.1(point 4).

³⁵⁴³ See Srebrenica Narrative,para.98.

³⁵⁴⁴ P6191,p.2(intercept regarding request for security to Omega); P6190,p.12(excerpt from DJURIĆ diary indicating call from POPOVIĆ from number "592-029"); P6191,p.2(excerpt from tactical intercept of 14 July 1995 conversation noting "Čelik requested from Omega to send security for Orahovac"); P4585-ENG2,pp.48,50("TRBIC = 592-029" and "CJB – Mane – One unit of 100 soldiers arriving"); M.ĐURIĆ(KW117):T.35032,35047-35051; P6188,p.3; [REDACTED]

983. KOVAČ's testimony that he only "noticed" the buses while in Zvornik and that he was "told by the police that they were being taken to the Zvornik Brigade barracks for screening"³⁵⁴⁵ was absurd, given that the RS MUP were securing the convoy from Bratunac.³⁵⁴⁶ In addition, his evidence that he "ordered the police to cease communication with the military security organ and not to be involved in any way in their activities"³⁵⁴⁷ was telling.³⁵⁴⁸ KOVAČ testified that on about 14 July³⁵⁴⁹ he was told by ĐURIĆ that BEARA had requested a police unit, and that ĐURIĆ and VASIĆ were worried that the unit "might be used for illegal activities, including liquidations of prisoners".³⁵⁵⁰ On the basis of this information, KOVAČ claimed, he ordered the police "not to cooperate with BEARA".³⁵⁵¹ Asked why he did not raise this with KARADŽIĆ when they met on 15 July, KOVAČ claimed that he "considered the problem solved",³⁵⁵² that he had "no reason to believe that [the VRS] were planning mass executions and killings,"³⁵⁵³ then, bizarrely, that he "saw BEARA as a petty manipulator", "a man bent on crime"—but "had no idea that he was capable of such great evil".³⁵⁵⁴ KOVAČ's absurd attempt to lay the blame for the organised execution of thousands on the rogue acts of BEARA here compel the conclusion that he knew that the Muslim men were transported from Bratunac to Zvornik to be executed, but that he lied to the Trial Chamber consistently in an effort to separate himself and the MUP from the murder operations in the Zvornik area.

██████████; T.TANIĆ:P369,p.17(a guard at Orahovac told TANIĆ that he was a policeman from Doboj).

³⁵⁴⁵ T.KOVAČ:D3960,para.126; T.KOVAČ:T.42776. KOVAČ denied that the convoy of prisoners stopped at Hotel Vidikovac. T.KOVAČ:T.42797-42798. ĐURIĆ similarly maintained the absurd claim that he had no advance knowledge of the convoy's arrival. M.ĐURIĆ(KW117):T.35041-35044.

³⁵⁴⁶ M.ĐURIĆ(KW117):T.35041-35044.

³⁵⁴⁷ T.KOVAČ:D3960,para.124. *See also* T.KOVAČ:T.42787-42788.

³⁵⁴⁸ ĐURIĆ also claimed that he spoke to KOVAČ by telephone, and was ordered to secure the road to allow the traffic to go through, but to "[k]eep the police out of it". M.ĐURIĆ:T.35043-35046. BOROVCANIN claimed that KOVAČ told him on 14 July that MUP units should "distance [them]selves from anything other than combat tasks". Lj.BOROVCANIN:D3659,para.41. ██████████

³⁵⁴⁹ KOVAČ was inconsistent about the date of this conversation. *See* T.KOVAČ:T.42787(perhaps two days later),42788(day or 2 later)-42789(in the night between 14/15);

T.KOVAČ:D3960,para.124(perhaps on 14 July).

³⁵⁵⁰ T.KOVAČ:D3960,para.124; T.KOVAČ:T.42787.

³⁵⁵¹ T.KOVAČ:D3960,para.125; T.KOVAČ:T.42801.

³⁵⁵² T.KOVAČ:T.42801.

³⁵⁵³ T.KOVAČ:T.42801.

³⁵⁵⁴ T.KOVAČ:T.42802.

(n) MUP officials kept **KARADŽIĆ** informed of events in the Zvornik area

984. As the organised executions (between 14 and 16 July) were ongoing in the Zvornik area, the MUP (including DB) reporting chain remained a consistent and reliable means by which **KARADŽIĆ** was kept informed.³⁵⁵⁵

985. On 15 July, VASIĆ reported to **KARADŽIĆ** directly about the danger to Zvornik presented by the column of Muslim men.³⁵⁵⁶ On 16 July, KARIŠIK travelled to Zvornik and informed **KARADŽIĆ** that PANDUREVIĆ had opened a corridor for the Muslim men to pass through, even before the VRS-GŠ were made aware of this.³⁵⁵⁷ KARIŠIK was briefed at the Zvornik CJB about the situation and problems in Zvornik, then travelled with VASIĆ to the Zvornik Brigade IKM, where he met and spent several hours with PANDUREVIĆ.³⁵⁵⁸ [REDACTED]
[REDACTED].³⁵⁵⁹ KARIŠIK had also received information from KIJAC that there were prisoners in Zvornik.³⁵⁶⁰ PANDUREVIĆ, whom KARIŠIK met, had also reported to the DK command on 15 July about the "large number of prisoners distributed throughout schools in the brigade area".³⁵⁶¹

986. KOVAČ briefed **KARADŽIĆ** in person on the night of 14 July,³⁵⁶² and met with him again on 15 July, along with others, including KRAJIŠNIK.³⁵⁶³ KOVAČ said that "[a]t that time, [he] was moving intensively around the area every day, Vidikovac, Pale",³⁵⁶⁴ but denied he and **KARADŽIĆ** spoke about Srebrenica on 15 July because two of the other men present were "leaders of the city of Sarajevo".³⁵⁶⁵

³⁵⁵⁵ See V.D:Reporting Chain to **KARADŽIĆ**.

³⁵⁵⁶ P5137.

³⁵⁵⁷ See V.G.2.(r):16 July, **KARADŽIĆ** briefed by KARIŠIK.

³⁵⁵⁸ M.KARIŠIK:D3749,paras.38-39; M.KARIŠIK:T.40636,40644-40647,40649-40650,40652.

³⁵⁵⁹ [REDACTED]

³⁵⁶⁰ M.KARIŠIK:T.40635-40636; P4981. See also R.BUTLER:T.27895-27896. KARIŠIK conceded, on the basis of KIJAC's report, that he knew there were prisoners in Zvornik. M.KARIŠIK:T.40635-40636.

³⁵⁶¹ P138,p.1; R.BUTLER:P4914,para.7.72; R.BUTLER:T.27839-27840.

³⁵⁶² See V.G.2.(g):13 July, KOVAČ met with MLADIĆ.

³⁵⁶³ P2242,p.92.

³⁵⁶⁴ T.KOVAČ:T.42796.

³⁵⁶⁵ T.KOVAČ:D3960,paras.129-132.

987. The evidence overwhelmingly shows that MUP officials—including KARIŠIĆ³⁵⁶⁶ and KOVAČ—had direct access to **KARADŽIĆ**. They were in a position to, and did, keep him informed of events in Zvornik municipality, ensuring his absolute oversight of the Srebrenica crimes. Their staggering denials and efforts to disassociate themselves from the Srebrenica events only reinforced the obvious truth of their—and **KARADŽIĆ**'s—complicity in the Srebrenica crimes.

(o) 14 July, **KARADŽIĆ** declared a State of War in Srebrenica-Skelani

988. On the morning of 14 July, **KARADŽIĆ** issued two consecutive decisions. The first (01-1371/95) provided for the appointment and organisation of Serb civilian authorities in Srebrenica, thereby ensuring permanent Serbian control over the town.³⁵⁶⁷ DERONJIĆ was appointed President of the War Presidency.³⁵⁶⁸

989. The second (01-1372/95), which was sent to the VRS-GŠ and the DK at 11:55 on 14 July 1995,³⁵⁶⁹ proclaimed a "State of War in Srebrenica-Skelani Municipality"³⁵⁷⁰ to "enable the full engagement of human and material resources in the defence of the Republic". Among other things, it ordered that "Armed forces *in zone of the Drina Corps* shall take all necessary measures to accomplish the *set goals*" and that all state organs were obliged to provide support.³⁵⁷¹

990. As ŠKRBIĆ testified, the effect of the decision was to circumvent the need to submit a specific request or follow a particular procedure to secure civilian resources.³⁵⁷² Although ŠKRBIĆ did not understand at the time why a state of war had only been declared in Srebrenica-Skelani Municipality,³⁵⁷³ the decision related to the "zone of the Drina Corps",³⁵⁷⁴ which included Srebrenica and the Bratunac and

³⁵⁶⁶ See V.G.1.(h):11 July, **KARADŽIĆ** issued two Decisions/Orders.

³⁵⁶⁷ P5143.

³⁵⁶⁸ P5143.

³⁵⁶⁹ P2803,p.3,line340.

³⁵⁷⁰ P4553. See also P2998.

³⁵⁷¹ P4553(emphasis added).

³⁵⁷² P.ŠKRBIĆ:T.25986-25987. See also P.ŠKRBIĆ:T.25998-25001.

³⁵⁷³ P.ŠKRBIĆ:T.25984.

³⁵⁷⁴ P4553,para.3.

Zvornik areas where the "set goals"³⁵⁷⁵ included the executions and burials of thousands of Muslim men.

991. The only reasonable inference is that **KARADŽIĆ** issued his decision (01-1372/95) for two reasons. First, to give his appointee, **DERONJIĆ**, as President of the War Presidency of Skelani-Srebrenica Municipality, extraordinary powers;³⁵⁷⁶ and second, to facilitate the use of civilian personnel and equipment for the murder and burial operations.³⁵⁷⁷

(p) 14 July, BEARA met [REDACTED] in Zvornik

992. [REDACTED]³⁵⁷⁸ met with BEARA at the Zvornik Brigade command on 14 July.³⁵⁷⁹ BEARA told him: "We have a lot of prisoners and it is very hard for us to control them. They are at various locations in the Zvornik municipality. We have to get rid of them. I expect assistance from the municipality."³⁵⁸⁰ BEARA expected help from the civilian authorities in burying the bodies.³⁵⁸¹

993. BEARA said that the order to "get rid" of the prisoners came from "two presidents."³⁵⁸²

994. **KARADŽIĆ** must have been one of the "presidents" to whom BEARA was referring; he was the only President in the RS to whom BEARA was subordinate, [REDACTED]

³⁵⁷⁵ P4553,para.3. The evidence does not support an inference that on 14 July the column of Muslim men fleeing towards Tuzla, or the smaller groups of Muslim men that remained scattered around the territory of Srebrenica, were a threat to Srebrenica-Skelani Municipality such as to require the full engagement of human and material resources towards the end of protecting this municipality. M.KATANIĆ:T.24484-24487. *Contra* T.TODOVORIĆ:T.24204-24205.

³⁵⁷⁶ The War Presidency was invested with all executive and legislative powers and had direct links to Republican level authorities. D.HANSON:P2589,paras.122,126,131-132.

³⁵⁷⁷ P.ŠKRBIĆ:T.25986-25987. *See also* P.ŠKRBIĆ:T.25998-25001.

³⁵⁷⁸ [REDACTED]
³⁵⁷⁹ KDZ320:P4990,pp.5-6; KDZ320:T.28082-28083. [REDACTED]

[REDACTED]. KDZ320:P4990,pp.5-6; KDZ320:T.28083; [REDACTED] An entry in the Zvornik Duty Officer Notebook on that date has his name and number. P4585-ENG2,p.48 [REDACTED]. KDZ320's visit to the Zvornik Brigade command was on a day when PANDUREVIĆ was absent, and when prisoners were being held at various locations throughout Zvornik municipality. KDZ320:P4990,p.6.

³⁵⁸⁰ KDZ320:P4990,p.7; KDZ320:T.28086-28088.

³⁵⁸¹ KDZ320:P4990,pp.8-9; KDZ320:T.28083-28086.

³⁵⁸² KDZ320:P4990,p.9; KDZ320:T.28083-28084; [REDACTED]

998. **KARADŽIĆ** and **DERONJIĆ** must have discussed the murder and burial operations then in progress in the Bratunac and Zvornik areas. More particularly, **DERONJIĆ** would have reported back to **KARADŽIĆ** on the implementation of **KARADŽIĆ**'s order that Muslim prisoners were to be transported to Zvornik by midday that day.³⁵⁸⁸

999. **DERONJIĆ** knew about the killings at Kravica Warehouse,³⁵⁸⁹ and, with **BEARA**, had been organising logistics for burying the bodies and covering up the massacre since the night before.³⁵⁹⁰ By the morning of 14 July, the burials were underway.³⁵⁹¹ The only reasonable inference is that **DERONJIĆ** travelled to Pale in advance of his meeting with the delegation from Srebrenica, to meet with **KARADŽIĆ** in private, report on these significant events and receive further instructions.³⁵⁹²

1000. **KARADŽIĆ** was continually updated. During his meeting with **DJURDJEVIĆ** between 17:00 and 19:15 later that day,³⁵⁹³ **KARADŽIĆ** received a telephone call from a "field commander defending the major road north of Srebrenica". **KARADŽIĆ** said: "There's been a lot of fighting today around Konjević Polje and Kasaba. The Muslim soldiers are trying to break through toward Tuzla. He claims there are 10,000 of them in the woods. But 2,000 to 3,000 seem more likely to me."³⁵⁹⁴ This call must have related to the activities of MUP and VRS units then setting up ambushes to capture and kill remnants of the column of Muslim men in the

³⁵⁸⁸ P6692.

³⁵⁸⁹ On 13 July, **M.KATANIĆ** had been told by **DERONJIĆ** at the SDS office in Bratunac about the killings at Kravica Warehouse. **M.KATANIĆ**:P4374,para.72; **M.KATANIĆ**:T.24474. **BOROVČANIN** testified that **BEARA** and **DERONJIĆ** had talked about what had happened at Kravica Warehouse on the evening before, though not about "any subsequent killings" at the warehouse.

Lj.BOROVČANIN:D3659,para.36; **Lj.BOROVČANIN**:T.39444-39445. **Jovan NIKOLIĆ** testified that he reported to **DERONJIĆ** and the civilian authorities in Bratunac the "horrible sight" that he had witnessed in Kravica. **J.NIKOLIĆ**:T.35501. **Aleksandar TESIĆ** testified that on 14 July he saw a huge number of dead bodies outside Kravica, like "stacked firewood". **A.TEŠIĆ**:D3118,para.40; **A.TEŠIĆ**:T.35325-35327.

³⁵⁹⁰ See Srebrenica Narrative,para.60.

³⁵⁹¹ See Srebrenica Narrative,para.61.

³⁵⁹² See also **M.KATANIĆ**:P4374,para.72. See also **L.SIMIĆ**:T.37306-37308,37292-37293; **L.SIMIĆ**:D3400,pp.21-22.

³⁵⁹³ P2242,p.91.

³⁵⁹⁴ **R.ĐURĐEVIĆ**:P4513,pp.26-27; **R.ĐURĐEVIĆ**:T.25951; P4514,p.2.

area of Konjević Polje, consistent with VASIĆ's written reports of 14³⁵⁹⁵ and 15 July,³⁵⁹⁶ and BLAGOJEVIĆ's report to the DK Command on 15 July.³⁵⁹⁷

1001. On the night of 14/15 July, **KARADŽIĆ** met with BAJAGIĆ.³⁵⁹⁸ BAJAGIĆ tried to dismiss this, asserting that their meeting was "for a short time", first claiming that they only "ran into each other in the hallway" and had a short exchange.³⁵⁹⁹ This was a false attempt to hide a lengthy meeting. **KARADŽIĆ**'s agenda records that they met for 50 minutes.³⁶⁰⁰ In short, this was a briefing at which BAJAGIĆ would have informed **KARADŽIĆ** on events in the Srebrenica area about which he had direct knowledge,³⁶⁰¹ including, on 13 July, his visit to Srebrenica with MLADIĆ and SALAPURA,³⁶⁰² his meeting with MLADIĆ in Vlasenica,³⁶⁰³ the executions at Kravica Warehouse about which he had been told on 14 July,³⁶⁰⁴ and that he had seen Muslim men held at the Nova Kasaba football field.³⁶⁰⁵

(r) 16 July, **KARADŽIĆ** briefed by KARIŠIK

1002. At approximately 04:00 on 15 July, the ABiH 2nd Corps attacked, from the direction of Kalesija and Tuzla, the positions of the Zvornik Brigade in the areas of the 4th, 6th and 7th Battalions.³⁶⁰⁶ OBRENOVIĆ requested reinforcements that morning.³⁶⁰⁷ In the circumstances, the Muslim column posed a significant threat to the Zvornik Brigade 4th, 6th and 7th Battalion positions on the morning of 15 July.³⁶⁰⁸

³⁵⁹⁵ P4949.

³⁵⁹⁶ P5191,p.1.

³⁵⁹⁷ P5117.

³⁵⁹⁸ P2242,p.91; P6443.

³⁵⁹⁹ Z.BAJAGIĆ:D3853,para.36; Z.BAJAGIĆ:T.41184.

³⁶⁰⁰ P2242,p.91.

³⁶⁰¹ Z.BAJAGIĆ:T.41185-41193.

³⁶⁰² P4201,V000-9016,00:00:08-00:01:13,00:01:39-00:02:41; P4202,pp.113,115,268-26.

³⁶⁰³ Z.BAJAGIĆ:T.41161-41163.

³⁶⁰⁴ Z.BAJAGIĆ:T.41170,41207. BAJAGIĆ's claims that he had no knowledge about killings when he met with **KARADŽIĆ** are not credible. See DCC(Z.BAJAGIĆ).

³⁶⁰⁵ Z.BAJAGIĆ:T.41148-41156.

³⁶⁰⁶ P4586; P138/P179(duplicates); P4585-ENG2,pp.58-68.

³⁶⁰⁷ P4585-ENG2,p.62("0921 OBRENOVIĆ – ordered an urgent request for reinforcenemtns from the Corps REPORTED").

³⁶⁰⁸ R.BUTLER:P4914,para.10.22; P4586.

1003. PANDUREVIĆ returned to the Zvornik area on 15 July,³⁶⁰⁹ and by about 19:25 reported to the DK command about the increasingly serious situation in the Zvornik Brigade's AOR.³⁶¹⁰

[REDACTED]

1005. VASIĆ reported in the late evening on 15 July to **KARADŽIĆ**, the VRS-GŠ and MUP directly:

Forces are urgently needed to comb the terrain and destroy them as there is a danger that they might block communications and directly endanger Zvornik and the general area.³⁶¹⁴

1006. In the early hours of 16 July, Zvornik Brigade units suffered heavy losses fighting the Muslim column of men desperately seeking to escape to ABiH-held territory.³⁶¹⁵ PANDUREVIĆ made contact with the ABiH commander and, around 13:00, negotiated a ceasefire and temporary corridor to allow passage to ABiH-held territory.³⁶¹⁶ The corridor was opened between 14:00 and 17:00-18:00.³⁶¹⁷ About 4,000 Muslims, "soldiers and civilians", passed through the VRS frontline. It was

³⁶⁰⁹ P4586; P138/P179(duplicates); R.BUTLER:P4914,p.8. [REDACTED]

³⁶¹⁰ P138,p.1; R.BUTLER:P4914,pp.8-9.

³⁶¹¹ [REDACTED]

³⁶¹³ [REDACTED]

³⁶¹⁴ P5137(the timestamp reads 23:00). *See also* P4981.

³⁶¹⁵ P4587; P180; [REDACTED]

³⁶¹⁶ P180; P4960,p.4; R.BUTLER:T.27588-27589; [REDACTED]

³⁶¹⁷ [REDACTED]. *See also* P5310. '01' is the codename used by the commander of a unit and must therefore be a reference to PANDUREVIĆ, Zvornik Brigade commander. R.BUTLER:T.27588-27589.

further agreed that "another 1,500 civilians on their way from Konjević Polje" be allowed through.³⁶¹⁸

1007. **KARADŽIĆ** was informed of the agreement by **KARIŠIK**,³⁶¹⁹ who was in Zvornik on 16 July 1995, with **PANDUREVIĆ**.³⁶²⁰ **KARADŽIĆ** has conceded on the record that **KARIŠIK** spoke to him on 16 July from Zvornik.³⁶²¹ **KARIŠIK**, incredibly, denied this. Although apparently able to contact the Pale Police Forces Command Staff at 15:00 on the same day,³⁶²² he claimed his "technical capacities were very poor",³⁶²³ insisting: "I was not the man who was reporting on operation Srebrenica to President Karadzic at any point in time."³⁶²⁴

1008. At 15:00, **KARIŠIK** informed the Police Forces Command Staff in Pale about **PANDUREVIĆ**'s negotiations with the ABiH, and at around 16:35, the Staff was able to confirm that an agreement had been reached by telephone with the Zvornik CJB.³⁶²⁵ **VASIĆ** meanwhile reported to the Office of the Minister in Pale and the Police Forces Command Staff that at 13:00 **PANDUREVIĆ** had agreed to open a one kilometre corridor to allow the Muslim forces to leave.³⁶²⁶

1009. **KARADŽIĆ** called the VRS-GŠ a "short while" before 16:15 and the VRS-GŠ duty officer called **MLADIĆ**,³⁶²⁷ who was then in Belgrade.³⁶²⁸ **KARADŽIĆ** was able to and did make immediate contact with the VRS-GŠ when he considered it necessary. His contact with the VRS-GŠ concerning the column and his later comments³⁶²⁹ reveal he was concerned that Muslims were getting away while the killing and burial operations in the Zvornik area were proceeding as planned.

³⁶¹⁸ P5138.

³⁶¹⁹ D2002.

³⁶²⁰ M.KARIŠIK:D3749,paras.37-39; M.KARIŠIK:T.40634-40635,40649-40650. *See also* V.G.2.(n):MUP officials kept **KARADŽIĆ** informed of events in the Zvornik area; P4981.

³⁶²¹ T.22942. [REDACTED]

³⁶²² M.KARIŠIK:T.40653; P5222.

³⁶²³ M.KARIŠIK:T.40654,40657.

³⁶²⁴ Rather, he claimed, he was "only negotiating with Mr. Pandurević to bring about the exchange of [a] policeman". M.KARIŠIK:T.40656-40657.

³⁶²⁵ P5222.

³⁶²⁶ P5138.

³⁶²⁷ D2002.

³⁶²⁸ P4201,V000-9016,00:43:39-00:51:53; P4202,pp.167,169,286-289.

³⁶²⁹ P1412,p.17.

1010. At about 15:29, the VRS-GŠ requested of the Zvornik Brigade duty officer, then TRBIĆ,³⁶³⁰ an urgent report from "Vinko" as to "what has been done" because the VRS-GŠ had to "get permission from the main boss", "from the main head of state."³⁶³¹ VRS-GŠ efforts to contact PANDUREVIĆ, who was "currently far off in the field", were unsuccessful. VASIĆ had information on PANDUREVIĆ's activities and communicated it to the VRS.³⁶³² MLADIĆ ordered POPOVIĆ to go to see PANDUREVIĆ,³⁶³³ and order him to report on the agreement with the other side.³⁶³⁴ POPOVIĆ met PANDUREVIĆ in the Zvornik area³⁶³⁵ and reported.³⁶³⁶ PANDUREVIĆ advised the DK command in an interim report³⁶³⁷ that he had opened a corridor "for the civilian population – about 5,000 of them".³⁶³⁸ He also noted that he would seal off the Kamenica area and "start searching the terrain", because "the Krivaja 95 operation is not complete as long as a single enemy soldier or civilian remains behind the front line".³⁶³⁹

1011. PANDUREVIĆ's actions—which superficially were seen to deviate from the plan to murder the Muslim men and boys of Srebrenica—did not have the approval of **KARADŽIĆ** and/or the VRS-GŠ.³⁶⁴⁰ The efforts made to contact PANDUREVIĆ demonstrate that **KARADŽIĆ**, as Supreme Commander, was at the apex of the chain of command of the VRS, and that MLADIĆ was his direct subordinate; that **KARADŽIĆ**'s approval was sought at each and every step during the Srebrenica events—from the beginning, to the very end.

(s) 16-17 July, BEARA and POPOVIĆ arranged logistics

1012. On 16 July, the killing operations in the Zvornik area continued.³⁶⁴¹ On the night of 15 July and morning of 16 July, D.NIKOLIĆ organized fuel "for the transport

³⁶³⁰ P4585-ENG2,pp.82,84.

³⁶³¹ P5076,p.1.

³⁶³² P5316. *See also* P5320(33 minutes later, Zlatar requests Palma have the commander call Zlatar at extension 385); R.BUTLER:T.27577(noting that "Zlatar" is the code-name used by the DK); P5138.

³⁶³³ P5078.

³⁶³⁴ P4585-ENG2,pp.84,149,150.

³⁶³⁵ P4585-ENG2,p.84; V.POPOVIĆ:D3993,para.76.

³⁶³⁶ P5079,p.1.

³⁶³⁷ P180,p.2; R.BUTLER:T.27595-27596. *See also* P5095.

³⁶³⁸ P180,p.1.

³⁶³⁹ P180,p.2.

³⁶⁴⁰ PANDUREVIĆ was "not to do anything without authorisation". D2002.

³⁶⁴¹ *See e.g.* Srebrenica Narrative,paras.102,122,125-126,131.

of troops to Kula" as well as ammunition to the 1st Battalion.³⁶⁴² The fuel and ammunition would be used to transport and summarily execute the prisoners at the Kula School.³⁶⁴³

1013. At 11:11, CEROVIĆ told BEARA, who was in the Zvornik area,³⁶⁴⁴ that TRKULJA, VRS-GŠ Chief of Armoured Mechanised Unit³⁶⁴⁵, "was here with me" with instructions "from above" that "triage has to be done on the prisoners".³⁶⁴⁶ BEARA answered "[y]es".³⁶⁴⁷ In this context, "Triage" was clearly a coded reference to the killing operation planned for the 1,000-2,000 Bosnian Muslim prisoners being held at the Kula School in Pilica and the Pilica Cultural Centre³⁶⁴⁸ as no legitimate medical triage was carried out on these Bosnian Muslim prisoners.³⁶⁴⁹ The instructions must have also come from MLADIĆ, the only commander "above" both BEARA and TRKULJA.³⁶⁵⁰

1014. In the early morning of 16 July, BEARA contacted KOS (a member of the 10th DOD³⁶⁵¹) and requested that seven members of the 10th DOD be brought to the Corps command in Vlasenica.³⁶⁵² A few hours later, when members of the 10th DOD returned to base, KOS was ordered to take the men to guard prisoners.³⁶⁵³ They travelled from their base in Dragaševac to the Zvornik Brigade's Standard Barracks.³⁶⁵⁴ A VRS Lieutenant Colonel accompanied by two DK MPs led the 10th

³⁶⁴² See Srebrenica Narrative, para.131.

³⁶⁴³ See Srebrenica Narrative, para.131.

³⁶⁴⁴ See P4585-ENG2, pp.76,78 ("BEARA to call Panorama 155 at 0930 hrs" and "It was reported to BEARA"). Panorama 155 was the VRS-GŠ telephone extension used by General MILETIĆ. S.FREASE:T.26721; R.BUTLER:T.27518; R.VUKOVIĆ:T.15099.

³⁶⁴⁵ L.OBRADOVIĆ:T.25122; R.BUTLER:T.27587.

³⁶⁴⁶ P5075; [REDACTED]; [REDACTED]. R.BUTLER:T.27585-27586. Participant X is Captain Milorad TRBIĆ, the brigade Duty Officer that day; he entered the substance of the intercept in the Duty Officer's Logbook nearly simultaneously at 11:15. P4585-ENG2, p.78 ("At 1115 hrs. It was reported from Zlatar that a triage of wounded and prisoners must be carried out (It was reported to BEARA)"). TRBIĆ was NIKOLIĆ's assistant in the Zvornik Brigade Security Organ. R.BUTLER:T.27605.

³⁶⁴⁷ P5075; [REDACTED]; [REDACTED].

³⁶⁴⁸ R.BUTLER:T.27586-27587.

³⁶⁴⁹ R.BUTLER:T.27586.

³⁶⁵⁰ See P4446.

³⁶⁵¹ F.KOS:D3927, p.2.

³⁶⁵² F.KOS:D3927, pp.20,36.

³⁶⁵³ F.KOS:D3927, pp.20-21,36.

³⁶⁵⁴ D.ERDEMOVIĆ:P332, pp.41-42; F.KOS:D3927, pp.21-23.

DOd soldiers from Standard Barracks to Branjevo Farm.³⁶⁵⁵ The members of the 10th DOd spent the day at Branjevo Farm executing over 1,000 Muslim men.³⁶⁵⁶

1015. At 13:58, TRBIĆ,³⁶⁵⁷ the Zvornik Brigade Duty officer relayed POPOVIĆ's request for "500 litres of D2" (diesel fuel) to the DK Command Duty Officer.³⁶⁵⁸ TRBIĆ later called BAŠEVIĆ and told him to pass on POPOVIĆ's message from the field in the Zvornik area that "500 litres of D2 are urgently being asked for him or else the work he's doing will stop."³⁶⁵⁹ TRBIĆ then called GOLIĆ repeating POPOVIĆ's urgent request for fuel.³⁶⁶⁰

1016. Finally, TRBIĆ spoke to an unidentified participant and told him that "[a] bus loaded with oil is to go to Pilica village", and advised that KRSMANOVIĆ (DK Transportation Chief) call the Zvornik Brigade Vehicle Battalion.³⁶⁶¹ A Zvornik Brigade material dispatch order, dated 16 July 1995, memorialised the disbursement of 500 litres of D2 to the DK Command addressed "for Lt. Col. POPOVIĆ".³⁶⁶²

1017. At the time of this intercept, the only activities ongoing in the area were the execution of the remaining Muslim men held at the Kula School.³⁶⁶³ There were no combat activities.³⁶⁶⁴ The only reasonable inference that can be drawn is that the fuel POPOVIĆ requisitioned was used to "finish [] the job"³⁶⁶⁵ at Kula School, enabling the transportation of the Muslim men for execution at the Branjevo Military Farm to continue.³⁶⁶⁶

³⁶⁵⁵ D.ERDEMOVIĆ:P332,pp.44-48; P249.

³⁶⁵⁶ D.ERDEMOVIĆ:P332,pp.37-40,42-49. *See* Srebrenica Narrative,paras.131,133,136.

³⁶⁵⁷ P4585-ENG2,p.82.

³⁶⁵⁸ *See* P5077,p.1. *See also* S.FREASE:T.26720("Zlatar was the code-name of the Drina Corps based in Vlasenica, and Palma was the code-name of the Zvornik Brigade based in Zvornik.").

³⁶⁵⁹ P5077,p.1.

³⁶⁶⁰ P5077,p.2("GOLIĆ, Pop just called me and told me to contact you. 500 litres of D2 to be sent to him immediately, otherwise his work will stop.").

³⁶⁶¹ P5077,p.2. POPOVIĆ's urgent request for fuel is further corroborated by a contemporaneous notation made in the Zvornik Brigade Duty Officer's Notebook: P4585-ENG2,p.82.

³⁶⁶² S.FREASE:P4669,p.67; R.BUTLER:T.27594.

³⁶⁶³ *See* Srebrenica Narrative,para.132. *See also* D.ERDEMOVIĆ:P332,p.51.

³⁶⁶⁴ R.BUTLER:T.27835-27837; D.MANNING:T.25849.

³⁶⁶⁵ P5079,p.1.

³⁶⁶⁶ *See* Srebrenica Narrative,para.134.

1018. In the afternoon, the Lieutenant Colonel returned to Branjevo Farm and told the 10th DOD soldiers that some 500 prisoners at the Pilica Cultural Centre were also to be executed.³⁶⁶⁷

1019. Drazen ERDEMOVIĆ sat in the coffee bar³⁶⁶⁸ together with the Lieutenant Colonel who had been at Branjevo Farm and 10th DOD members B.GOJKOVIĆ and KOS.³⁶⁶⁹ One Bratunac soldier who had been at Branjevo Farm arrived and told the Lieutenant Colonel, "everything is finished".³⁶⁷⁰ The Lieutenant Colonel stood up and said "[w]ho remained alive has remained alive."³⁶⁷¹

1020. BEARA, who was also present at the coffee bar, told the assembled soldiers, "you have done a great job and the state will be grateful to you".³⁶⁷² BEARA's statement, when considered in light of all of the other evidence showing the planned and highly coordinated nature of the executions, confirms that the highest levels not just of the VRS and RS MUP, but of the RS state itself, headed by **KARADŽIĆ**, were behind these executions.

1021. On 17 July, the burying of murdered Muslim prisoners executed at Branjevo Farm and Pilica Cultural Centre began in earnest and under POPOVIĆ's supervision.³⁶⁷³ In an intercepted communication at 12:49, TRBIĆ was told by a caller that POPOVIĆ should "finish the jobs he is working on", and then report "immediately".³⁶⁷⁴ [REDACTED]

[REDACTED]³⁶⁷⁵ POPOVIĆ was in Zvornik³⁶⁷⁶ and his reference to the "job" referred to his work assisting the killing and burying of Bosnian Muslim males between 13 and 17 July.

³⁶⁶⁷ D.ERDEMOVIĆ:P332,pp.45-46,49-50,53,60-61,63-64; D.MANNING:P4504,p.7; AF1860.

³⁶⁶⁸ P4308,pp.233-236; J.RUEZ:T.23850-23852.

³⁶⁶⁹ D.ERDEMOVIĆ:P332,pp.64-65.

³⁶⁷⁰ D.ERDEMOVIĆ:P332,pp.64-65. *See also* F.KOS:T.42413; P169,p.16.

³⁶⁷¹ D.ERDEMOVIĆ:P332,p.65.

³⁶⁷² F.KOS:T.42414.

³⁶⁷³ *See* Srebrenica Narrative,para.141.

³⁶⁷⁴ P5081,p.4. The caller is looking for POPOVIĆ, as can be seen in an earlier intercepted communication the same day. P5080.

³⁶⁷⁵ [REDACTED]

³⁶⁷⁶ P4961; P5080.

(t) KARADŽIĆ denied access to the Srebrenica area and lied to the media

1022. **KARADŽIĆ** controlled access by the UN and international humanitarian organisations to the Srebrenica, Bratunac and Zvornik areas.³⁶⁷⁷ As early as 13 July, the UN Secretary-General was informed of concerns over the fate of "about 4,000 males of draft age still in Bratunac awaiting 'screening'" by the VRS,³⁶⁷⁸ and MLADIĆ's refusal "to allow all access, whether it be to personnel or convoys" to Srebrenica.³⁶⁷⁹ SMITH reported late that night to UNPF HQ in Zagreb that the Bosnian Serbs wanted "to remove the Enclaves"; they were "cleansing" Srebrenica, and men of military age were being "separated" from the refugees.³⁶⁸⁰ On 14 July, the UNMOs in Potočari reported concerns for the welfare of the men who had been taken to Bratunac, noting "we fear for the wors[t]."³⁶⁸¹ A 15 July 1995 report noted:

There was believed to be approx 38000 people in the enclave prior to the disaster. Therefore, approx 18-20000 are still not yet within UN/ABiH control. The BSA have confirmed that they are holding a quantity of males in Bratunac and Srebrenica. They have declared that the civ[ilian] males will be released soon and the ABiH males will be held for the purpose of PoW exchange.³⁶⁸²

1023. On 15 July, MLADIĆ met with AKASHI, STOLTENBERG, BILDT and MILOŠEVIĆ in Belgrade, and separately with UNPROFOR commanders SMITH and de La PRESLE.³⁶⁸³ SMITH and de La PRESLE pressed for the ICRC to gain immediate access to PoWs,³⁶⁸⁴ and for access by UNHCR to Srebrenica and Žepa because there were "rumours about atrocities, massacres and rape".³⁶⁸⁵ They also discussed the "immediate evacuation" of the injured from Potočari and Bratunac.³⁶⁸⁶

³⁶⁷⁷ P5183, paras. 2, 7, 8. *See also* P4536.

³⁶⁷⁸ P5204, p. 1.

³⁶⁷⁹ P5204, p. 1. On 14 July, MLADIĆ met with BILDT, UNPROFOR Commander de la PRESLE and MILOŠEVIĆ in Belgrade and discussed access by ICRC to Muslim prisoners and humanitarian access. P1488, pp. 2-3. They also discussed the "liberation of Dutch soldiers" who were freed and crossed over to the FRY on 15 July. P1488, p. 3; P5117; P4586. *See also* C.SCHMITZ: P4752, para. 64; P4757, p. 4; P1488, p. 4.

³⁶⁸⁰ P2278, p. 2; R.SMITH: T.11428-11431.

³⁶⁸¹ P4163, p. 2; J.KINGORI: P4140, paras. 205-208.

³⁶⁸² P4162, p. 3.

³⁶⁸³ R.SMITH: T.11431-11433; P1488, pp. 4-6; P2279. *See also* P4757, p. 4.

³⁶⁸⁴ R.SMITH: T.11431-11433; P1488, pp. 5-6; P2279, p. 2.

³⁶⁸⁵ P1488, pp. 5-6; P2279, p. 2.

³⁶⁸⁶ P2279, p. 2.

MLADIĆ met SMITH again on 19 July,³⁶⁸⁷ and agreed to provide access to the ICRC and UNHCR, and clearance for humanitarian aid convoys to enter Srebrenica.³⁶⁸⁸ He also agreed to allow UNPROFOR to withdraw from the enclave with "up to thirty locally-employed personnel,"³⁶⁸⁹ only agreeing unconditionally to the latter "[a]fter some debate."³⁶⁹⁰ As far as SMITH was aware, about 2,000 Muslim men separated in Potočari were unaccounted for;³⁶⁹¹ he was "still trying to find out what had [...] happened."³⁶⁹² MLADIĆ told him that Srebrenica was "finished in a correct way," claiming, like **KARADŽIĆ**,³⁶⁹³ that the civilian population were "evacuated at their own request and with the full cooperation and help of UNPROFOR."³⁶⁹⁴

1024. The "ethnic cleansing" of Srebrenica and separation of Bosnian Muslim men was reported by the BBC on 12 and 13 July,³⁶⁹⁵ and *The Independent* newspaper on 14 July.³⁶⁹⁶ On 15 or 17 July, independent Serb television channel, Studio B, broadcast a documentary showing footage video-taped on 13 and 14 July by Serbian journalist Zoran PETROVIĆ-PIROČANAC³⁶⁹⁷ of dead bodies of Muslim men outside the Kravica warehouse, and Muslim men detained in the White House in Potočari.³⁶⁹⁸ This documentary formed the basis for an article published in *The Independent* on 17 July, entitled "Bodies pile up in horror of Srebrenica".³⁶⁹⁹ Three days later, the "[m]ass slaughter" of "as many as 4,000 captured Muslim men from Srebrenica" was reported in the same newspaper.³⁷⁰⁰ On 16 July, MSF nurse

³⁶⁸⁷ This time accompanied by TOLIMIR and Lt.Col. INDIĆ. P2280; P1473,p.227.

³⁶⁸⁸ P2280,p.5. SMITH revealed he had information that not all the injured had been evacuated. MLADIĆ "appeared to have no knowledge of this" but "agreed to find out and resolve the matter". P2280, p.3.

³⁶⁸⁹ P2280,p.5.

³⁶⁹⁰ P2280,p.3.

³⁶⁹¹ R.SMITH:T.11435.

³⁶⁹² R.SMITH:T.11435.

³⁶⁹³ See V.G.2.(v):17 July, **KARADŽIĆ** lied to the international media.

³⁶⁹⁴ P2280,p.3; R.SMITH:T.11435-11437.

³⁶⁹⁵ P2081,p.1; P2082. See also J.BOWEN:T.10134.

³⁶⁹⁶ P4396,p.1.

³⁶⁹⁷ Z.PETROVIĆ-PIROČANAC:P376,p.25; T.BLASZCZYK:T.23573; [REDACTED]

³⁶⁹⁸ P1193; P4269; T.BLASZCZYK:T.23578-23579; Z.PETROVIĆ-PIROČANAC:T.28445.

³⁶⁹⁹ [REDACTED] R.BLOCK:T.24921-24924; P4397.

³⁷⁰⁰ P4398.

C.SCHMITZ reported in a telex: "[a]ccording to FRANKEN [the VRS] seem to have already more than 7000 PoW[s] in Bratunac."³⁷⁰¹

1025. **KARADŽIĆ** was aware of concerns expressed by the UN and international organisations,³⁷⁰² and of their requests for access to PoWs, but chose to ignore them.³⁷⁰³ For instance, on 21 July, KIJAC reported to him directly on DB monitoring of the ICRC, attaching an ICRC report "for the period between 10 and 16 July 1995,"³⁷⁰⁴ and noting that the ICRC in Belgrade had been inundated with phone calls as soon as BILDT announced negotiations to allow them "to visit the prisoners from Srebrenica".³⁷⁰⁵

1026. **KARADŽIĆ** was also aware of reports in the international media.³⁷⁰⁶ His response was to lie:

- To SRT³⁷⁰⁷ on 12 July,³⁷⁰⁸ he made false statements concerning the forcible removal of the Bosnian Muslim population and conditions in Potočari, claiming "the inhabitants are being simply taken care of and, of course, if they want to stay they may."³⁷⁰⁹
- To *El Pais* on 13 July,³⁷¹⁰ he claimed that "anyone" in the Bosnian Muslim community "who wanted to stay could stay",³⁷¹¹ but that "unfortunately" they would not because they were aware that "Srebrenica is going to belong to the Serbian state," and that they had "expressed their own willingness" to go.³⁷¹²

³⁷⁰¹ P4757,p.5(formatting removed). This report is corroborated by FRANKEN's evidence that he was told by JANKOVIĆ that they "already had 6,000 PoWs". R.FRANKEN:P4175,para.112. *See also* P4757,p.4.

³⁷⁰² *See* V.D.2:KARADŽIĆ was kept informed; V.G.2.(v):17 July, **KARADŽIĆ** lied to the international media; V.G.3.(b):**KARADŽIĆ** maintained restrictions on access.

³⁷⁰³ *See* V.G.3.(b):**KARADŽIĆ** maintained restrictions on access.

³⁷⁰⁴ P6538,p.3.

³⁷⁰⁵ P6538,pp.4-5.

³⁷⁰⁶ *See* V.G.3.(b):**KARADŽIĆ** maintained restrictions on access.

³⁷⁰⁷ SRT was a state-owned station founded by the RS Assembly. P5572.

³⁷⁰⁸ P4201,V000-9035,00:45:44-00:53:07; P4202,pp.87-89,261-265. *See also* P2081,p.1;

J.BOWEN:T.10133. **KARADŽIĆ**'s comment on the transfer of the refugees having just begun and his comments that the Serbs are beginning to set up civilian structures in Srebrenica date the interview as sometime on 12 July 1995, most likely in the afternoon or early evening.

³⁷⁰⁹ P4201,V000-9035,00:49:12-00:49:19; P4202,pp.87,89,263.

³⁷¹⁰ P2242,p.91.

³⁷¹¹ P4359,p.5.

³⁷¹² P4359,p.4.

- Asked by David FROST for CNN on 17 July, about "figures we've re[a]d in the media [...] about 15 000 men missing, unaccounted for, from Srebrenica,"³⁷¹³ **KARADŽIĆ** tellingly chose to explain that "we are not interfering" with the free passage of Muslims because "they want to leave" and many were still in the forests trying to get to Muslim-held territory.³⁷¹⁴ He claimed, falsely, "[m]any of [the Bosnian Muslim men] have join[ed] their own people yesterday, and today... even tomorrow, they will be many more of them passing t[h]rough Serbian lines."³⁷¹⁵

(u) 17-18 July, **KARADŽIĆ** "pardoned" local staff

1027. Once the Bosnian Muslim population was removed from Potočari, FRANKEN, SCHMITZ and KINGORI turned their attention towards ensuring the safe transport from the enclave of the Muslim sick and wounded, and their Muslim "local staff".³⁷¹⁶ These men escaped execution only because their identities were known to the international organisations then in Bratunac and Potočari.

1028. On 17 July, a convoy of Muslim sick and wounded was escorted by ICRC from Potočari and the Bratunac Health Centre to Tuzla.³⁷¹⁷ The convoy's passage was approved by the BSL,³⁷¹⁸ under **KARADŽIĆ**'s ultimate authority.³⁷¹⁹

1029. An additional 22 sick and wounded men at the Bratunac Health Centre (including seven of SCHMITZ's patients from Potočari³⁷²⁰), identified as "fit for military service," were not permitted to leave with the ICRC convoy.³⁷²¹ However,

³⁷¹³ P5235,pp.2-3.

³⁷¹⁴ P5235,pp.2-3.

³⁷¹⁵ P5235,p.3.

³⁷¹⁶ P4757,pp.4-11; R.FRANKEN:D2022,p.1; J.KINGORI:P4140,para.199;

C.SCHMITZ:P4752,paras.63,65; R.FRANKEN:P4175,paras.101-102. *See also* M.NIKOLIĆ:T.24684.

³⁷¹⁷ C.SCHMITZ:P4752,paras.63,68-69; P4757,pp.10-11; P5188,p.1; P4161,p.1; P5177,p.12,para.50; P5318. *See also* P4758; R.FRANKEN:P4175,paras.102-103; E.RAVE:P3995,paras.128,132.

³⁷¹⁸ P5188,p.1. *See also* P4161,p.1; J.KINGORI:P4140,para.211. Christine SCHMITZ knew that the head of the MSF Belgrade office was in contact with KOLJEVIĆ in Pale. C.SCHMITZ:P4752,para.72. *See also* R.FRANKEN:P4175,para.108; R.FRANKEN:D2022,p.5.

³⁷¹⁹ *See* P5183.

³⁷²⁰ SCHMITZ noted these patients' identities on her list of patients compiled by UNHCR.

C.SCHMITZ:P4752,paras.63,68; C.SCHMITZ:T.26823-26824; P4758,pp.3-8; P4161; R.FRANKEN:P4175,para.103. FRANKEN testified that one of his surgeons was left with these patients in Bratunac to ensure that they were treated as wounded, but was later called away and on his return the men "were gone". R.FRANKEN:P4175,para.103. *See also* E.RAVE:P3995,paras.130,132. However, all seven men were transported to Batković and included on the list of PoWs exchanged at the end of 1995. P5440.

³⁷²¹ P5188; P5440; P5177,para.50.

they were registered by ICRC, treated formally as PoWs, and ultimately taken by the Eastern Bosnian Corps MP to Batković camp, arriving on 18 July.³⁷²² These sick and wounded were the first Muslim men to arrive in Batković camp after the Srebrenica events,³⁷²³ and were amongst the 171 PoWs exchanged from Batković at the end of 1995.³⁷²⁴ They escaped execution because they were registered by ICRC and their deaths would have attracted unwanted international attention.

1030. On or about 17 July 1995, **KARADŽIĆ** granted an "amnesty" or "pardon[]" of the Muslim "local staff" remaining in Potočari, including those who worked for UNPROFOR³⁷²⁵ and MSF.³⁷²⁶ SCHMITZ understood the amnesty of her local staff to mean that they would not be killed.³⁷²⁷ Nesib MANDŽIĆ was also granted an amnesty, and thus was "free to go."³⁷²⁸

1031. **KARADŽIĆ** had authority and control over the murder operation such that he had the power of life or death over the Muslim men and boys of Srebrenica. Without his amnesty, the Muslim men amongst the local staff remaining in Potočari would have been killed.³⁷²⁹

1032. SCHMITZ was informed of the amnesty of her staff when, on 17 July 1995, she and FRANKEN met a delegation of VRS and Bosnian Serb civilian officials in Potočari.³⁷³⁰ The delegation was headed by JANKOVIĆ, and included M.NIKOLIĆ

³⁷²² D4132/P6261(duplicates); M.TODOROVIĆ:D4124,pp.285-291; P4758; P5440; P5177,para.50; R.FRANKEN:P4175,para.103; P5188,p.1.

³⁷²³ P5440(see column marked "date of arrival").

³⁷²⁴ P5440.

³⁷²⁵ P4390,p.1; P4161,p.1.

³⁷²⁶ P4390,p.1; C.SCHMITZ:T.26824-26825; P4161,p.1; P4758,p.10. *See also*

E.RAVE:P3995,paras.131-132; P5262,p.4.

³⁷²⁷ C.SCHMITZ:T.26825-26826. *See also* M.NIKOLIĆ:T.24686. SCHMITZ's evidence is corroborated by a conversation on 19 July between JANKOVIĆ and ĐURĐIĆ, in which JANKOVIĆ stated that the seven "able-bodied" Muslim men amongst MSF's local staff had "permission" to go. P5262,p.4. (ĐURĐIĆ was the VRS Colonel responsible for coordination with UNPROFOR and UNHCR. M.MILOVANOVIĆ:T.25443.) The seven men were identified by name. P5262,pp.3-4; C.SCHMITZ:T.28626-26830. SCHMITZ had recorded the names of the MSF local staff members in a telex sent on 16 July 1995. P4757,pp.8-9. She confirmed that the seven men identified were able-bodied. C.SCHMITZ:T.26830.

³⁷²⁸ P4161,p.1(This document refers to an amnesty granted "by the RSK" but must mean to state the "RS" or "VRS"). *See also* P4758,p.10(noting that Nesib MANDŽIĆ has an amnesty ("Ref. Rep. [...] amnesty")); P4757,p.8(Ref. Rep. is shorthand for "refugee representative").

³⁷²⁹ One such local staff member was MSF employee Meho BOŠNJAKOVIĆ. BOŠNJAKOVIĆ had decided to remain with his family and was later executed. His body and MSF ID card were found in the Orahovać (Lažete) grave. P4756; P4754; C.SCHMITZ:T.26830-26833; D.MANNING:P4504,p.102; P5913(Meho (Mehmed) BOSNJAKOVIĆ (Protocol ID 7371/06)); W.HAGLUND:P4318,p.217.

³⁷³⁰ R.FRANKEN:P4175,para.102; C.SCHMITZ:P4752,paras.67-68; P4161,p.1.

and DERONJIĆ.³⁷³¹ There was subsequent lack of clarity over whether or not MSF, as well as UNPROFOR local staff would be released. A dispatch sent on 18 July under the name of Momir NIKOLIĆ (but hand-written by JANKOVIĆ)³⁷³² requested:

Please send me your view on the permission to evacuate the *Medecins Sans Frontieres* international organisation, that is to say, what to do with the so-called local staff. The same relates to the military observers' and UNPROFOR's interpreters. *The RDB/State Security Department/ has conveyed to us the view that President KARADŽIĆ apparently pardoned all the local staff who worked for UNPROFOR.* It is our opinion that they should not be detained.³⁷³³

1033. MSF left Potočari on 21 July with their local staff, including the able-bodied Muslim men.³⁷³⁴

(v) 17 July, KARADŽIĆ lied to the international media

1034. The same delegation that met with FRANKEN and SCHMITZ on 17 July, brought a pre-prepared statement ("17 July Statement"³⁷³⁵) for MANDŽIĆ and FRANKEN to sign.³⁷³⁶ This statement, headed "Statement by representatives of the civilian authorities of the Srebrenica enclave", provided that MANDŽIĆ and the other Muslim civilian representatives had agreed during negotiations conducted at the Third Hotel Fontana Meeting

³⁷³¹ R.FRANKEN:P4175,para.103. DERONJIĆ was a signatory of the 17 July Statement. P4185,p.1. He was described by FRANKEN as "a civilian who appeared to be later on the new mayor or something of Srebrenica". R.FRANKEN:P4175,para.103. SCHMITZ testified, and recorded in her notes of the meeting, that she met with M.NIKOLIĆ and the "Civil Affairs Commissioner". C.SCHMITZ:P4752,para.68; C.SCHMITZ:T.26824-26825; P4758,p.10. This must have been DERONJIĆ. SCHMITZ testified that this "would only be logical" but that she did not remember that at that time she realised that it was him. *See also* C.SCHMITZ:T.26820-26821,26824-26825. In an earlier telex she referred to a phone call she received on 16 July 1995 from DERONJIĆ whom she described as "special rep of KARADŽIĆ in Bratunac". P4757,p.7. KINGORI testified that NIKOLIĆ and a "Civilian Affairs officer" were involved with the effort to transport some wounded and injured from Potočari. J.KINGORI:P4140,para.209.

³⁷³² P4390. The original handwritten report bears the initials "RJ" (B/C/S p.4) which stands for Radoslav JANKOVIĆ. The handwritten document (B/C/S pp.3-4) was taken by Momir NIKOLIĆ to be typed and transmitted. The typist inadvertently replaced "RJ" with Momir NIKOLIĆ, though NIKOLIĆ was not the author of the report. M.NIKOLIĆ:T.24683.

³⁷³³ P4390,p.1(emphasis added). According to Momir NIKOLIĆ, this report was handwritten by Colonel JANKOVIĆ, after which Momir NIKOLIĆ took it to the communications centre to be sent. The person in the communications centre typed it and sent it on, including Momir NIKOLIĆ's name on it. Thus, the report has JANKOVIĆ's text with Momir NIKOLIĆ's name in the signature block. M.NIKOLIĆ:T.24682-T.24683. *See also* P5188.

³⁷³⁴ C.SCHMITZ:P4752,para.76.

³⁷³⁵ *See* V.G.2(t):KARADŽIĆ denied access to the Srebrenica area and lied to the media.

³⁷³⁶ P4185,p.1. *See also* P3997; R.FRANKEN:P4175,para.104; E.RAVE:P3995,para.131.

- that our civilian population could stay in the enclave or move out, depending on the wish of each individual;
- should we wish to move out from the enclave, it was agreed that we could choose where we wanted to go; we decided that the entire civilian population move out of the enclave and be evacuated to the territory of Kladanj municipality.³⁷³⁷

1035. **KARADŽIĆ** knew that this statement in no way reflected the reality of either the Third Hotel Fontana Meeting or the departure of the Muslim population from Potočari, not least because the Muslim population was forcibly removed from Potočari, and the men and boys separated and killed, under his authority and direction.³⁷³⁸ **DERONJIĆ**, who co-signed the 17 July Statement, was present at the Third Hotel Fontana Meeting,³⁷³⁹ directly responsible to **KARADŽIĆ**,³⁷⁴⁰ and the recipient of his 13 July order to ensure that thousands of Muslim men in Bratunac were transported to Zvornik, to be killed there.³⁷⁴¹

1036. **MANDŽIĆ** and **FRANKEN**, also signatories of the 17 July Statement, were by then aware, as everyone was,³⁷⁴² that Muslim men and boys in Potočari had been separated and detained, feared killed. **FRANKEN** testified that the part of the statement referring to the wishes of the civilian population was "nonsense".³⁷⁴³ He sought to neutralise the whole statement³⁷⁴⁴ by adding to the concluding paragraph—which stated that the Serb side had observed the Geneva Conventions and rules of IHL—a handwritten reservation limiting the statement to those convoys escorted by UN forces;³⁷⁴⁵ DutchBat had only escorted the first and second convoys.³⁷⁴⁶ **FRANKEN** signed the 17 July Statement to ensure the safe transportation of the refugees, wounded and "locals working for the aid organisations".³⁷⁴⁷ **JANKOVIĆ**

³⁷³⁷ P4185,p.1(formatting removed).

³⁷³⁸ Defence witness **DMIČIĆ** testified that **SUBOTIĆ** had received the English version of the 17 July Statement in his office at 18:36 hours and gave it to **KARADŽIĆ**. He said, "[w]e were both satisfied with this deal with the Muslims," and that he, as a lawyer, believed "a signed and a certified document to be a public document", so he "couldn't doubt its validity". M.**DMIČIĆ**:D3977,para.17; M.**DMIČIĆ**:T.42896-42897. **DMIČIĆ**'s evidence is not credible or reliable and should be dismissed. See DCC(M.**DMIČIĆ**).

³⁷³⁹ See V.G.2.(b):12 July, **KARADŽIĆ**'s subordinates working together in Bratunac.

³⁷⁴⁰ See V.C.3.(a):**DERONJIĆ** and municipal authorities.

³⁷⁴¹ P6692.

³⁷⁴² See e.g. P4163,p.2.

³⁷⁴³ R.**FRANKEN**:P4175,para.105.

³⁷⁴⁴ R.**FRANKEN**:P4175,para.106.

³⁷⁴⁵ P3997; R.**FRANKEN**:P4175,paras.104,106; E.**RAVE**:P3995,para.131.

³⁷⁴⁶ R.**FRANKEN**:P4175,paras.79,82,84,106; P.**BOERING**:T.22148-22149.

³⁷⁴⁷ D2022,p.1.

had made clear to him that his signing of the statement would "favour" the evacuation of the sick and wounded.³⁷⁴⁸ Indeed after the agreement was signed, the first convoy of sick and wounded left Potočari with ICRC.³⁷⁴⁹ On 17 July, MANDŽIĆ was also given amnesty and told that he was free to leave Potočari with DutchBat.³⁷⁵⁰

1037. **KARADŽIĆ** and ZAMETICA understood the propaganda value of the 17 July Statement. Both used it immediately in the media to disseminate the lie that the Muslim population had left Srebrenica voluntarily.³⁷⁵¹ **KARADŽIĆ**'s use of the statement was tellingly anticipated in a conversation with a supporter in the US on the day before:

it would help immensely if we could get a faxed statement from [inaudible] from Pale which expressed very clearly what the treatment of civilian population [inaudible] both in Srebrenica and from Žepa.³⁷⁵²

1038. In the event, in his interview with David FROST late that night, **KARADŽIĆ** said:

what I have to tell is that those civilians have been offered either to stay, or to leave. And we have the document, I can show it to you, signed [...] in the presence of the UNPROFOR³⁷⁵³

1039. **KARADŽIĆ**'s interview with FROST on 17 July recalled JANKOVIĆ's suggestion on 13 July:

if we want to take over the enclaves of Žepa and Goražde in the same way, it will be necessary to present the operation in Srebrenica in the media, so as to show that we had rendered adequate treatment to the civilians, and even to soldiers who surrendered their weapons.³⁷⁵⁴

³⁷⁴⁸ R.FRANKEN:P4175,para.107.

³⁷⁴⁹ P4161,p.1; R.FRANKEN:P4175,para.107.

³⁷⁵⁰ P4161,p.1; P4758,p.10(noting that Nesib MANDŽIĆ had amnesty ("Ref. Rep. [...] amnesty")).

³⁷⁵¹ P6410,p.2. *See also* D3931,p.1; P6410,p.1. ZAMETICA's claim that he spoke to the media on the basis of the 17 July Statement and what he and **KARADŽIĆ** knew at the time was not credible. J.ZAMETICA:T.42485; T.42535-42536. ZAMETICA was neither a credible nor reliable witness. *See* DCC(J.ZAMETICA).

³⁷⁵² P5609,p.1.

³⁷⁵³ P5235,p.2.

³⁷⁵⁴ P166.

3. Continued implementation of the JCE to Eliminate including its cover-up

(a) 17 July, MLADIĆ and SARIĆ issued orders to sweep the terrain

1040. With the corridor closed, MLADIĆ's focus turned to the murder of all Muslim men remaining in the Bratunac and Zvornik areas. On 17 July, he ordered combined VRS and MUP units, under the command of KESEROVIĆ,³⁷⁵⁵ to "comb the territory in the zone of Bratunac-Drinjača-Milići-Bešići village with the aim of discovering and destroying lagging Muslim groups",³⁷⁵⁶ and VRS-GŠ officers TRKULJA, STANKOVIĆ and SLADOJEVIĆ to draw up a plan with PANDUREVIĆ for coordinated combat operations with MUP units to "comb the terrain, block, crush and destroy the straggling parts of armed Muslim groups in the wider areas of Kamenica, Cerska and Udrič."³⁷⁵⁷ Manpower from the Civilian Protection was to "clear up" the terrain as it was "being swept".³⁷⁵⁸

1041. Also on 17 July, SBP Commander SARIĆ issued an order to MUP units to search the terrain in the Pobude sector and "fully [očistila-cleanse/mop up] the right side of the Milići-Drinjača road, before regrouping for the search of Cerska".³⁷⁵⁹ BOROVIČANIN was "in charge of command and control"³⁷⁶⁰ and responsible for implementing this order.³⁷⁶¹

1042. VRS and MUP forces thereafter participated jointly in sweep operations in the Bratunac and Zvornik areas, during which Bosnian Muslim men were summarily executed upon their capture or surrender.³⁷⁶² These operations continued to the end of July and into August.³⁷⁶³ KARADŽIĆ was kept informed of the ongoing searches for groups of Muslim men from Srebrenica,³⁷⁶⁴ and of "ambushes" of groups of men from

³⁷⁵⁵ P4588; D.KESEROVIĆ:T.42032-42034.

³⁷⁵⁶ P4588.

³⁷⁵⁷ P4588. See also R.BUTLER:T.27613-T.27615.

³⁷⁵⁸ P4588.

³⁷⁵⁹ P5097,p.1.

³⁷⁶⁰ P5097,p.1.

³⁷⁶¹ P5097,p.2; D.KESEROVIĆ:T.42034-42035. See also P5140,p.3.

³⁷⁶² P5152; P4965; P5170; P5088,p.2; P5188. See also P181,p.1; [REDACTED]; R.BUTLER:T.27614-T.27615;

³⁷⁶³ See P5109. See Srebrenica Narrative,paras.145-163.

³⁷⁶⁴ P5132,p.4; P5193,p.3; P5195,p.4; P5194,pp.4-5; P5196,p.4; P5436,p.6; D2108,pp.5-6.

both the "enclaves of Žepa and Srebrenica".³⁷⁶⁵ Scheduled incidents within this period are described in the Srebrenica Narrative.³⁷⁶⁶ On 2 August 1995, KRSTIĆ, intercepted in a conversation with OBRENOVIĆ, said of the Muslim men: "Kill them all, God damn it."³⁷⁶⁷

(b) KARADŽIĆ maintained restrictions on access

1043. In late July, **KARADŽIĆ** continued to maintain restrictions on access to the Srebrenica and Bratunac areas in the face of intensifying pressure from international actors to provide access to Bosnian Muslim prisoners. On 24 July, Tadeusz MAZOWIECKI, Special Rapporteur of the UN Commission on Human Rights, wrote to **KARADŽIĆ** directly expressing his "deepest concern" over the Srebrenica events which "resulted in the forced displacement of some 40,000 individuals" and that "several thousand individuals are unaccounted for and there is fear that many of these have either been killed or detained."³⁷⁶⁸

1044. In light of these concerns, MAZOWIECKI requested "access to those who have been detained during the recent events."³⁷⁶⁹ While **KARADŽIĆ** most certainly received this request,³⁷⁷⁰ MAZOWIECKI received no response.³⁷⁷¹

1045. On 10 August, the UNSC passed a resolution demanding immediate access for UNHCR and ICRC to persons displaced from Srebrenica, including PoWs.³⁷⁷² By 30 August 1995, virtually every relevant UN agency, including UNPROFOR, UNHCR, UNHCHR, the Special Rapporteur of the Commission of Human Rights, and the ICTY, as well as ICRC, had received reports of the displacement and disappearances

³⁷⁶⁵ P5194,pp.4-5; P5196,p.4.

³⁷⁶⁶ See Srebrenica Narrative,paras.145-154.

³⁷⁶⁷ P6065,p.1. KRSTIĆ denied that he was a conversant on this intercept (D4136,pp.837-838), but his evidence on this issue and generally was plainly not credible. See DCC(KRSTIĆ). See also

[REDACTED]

³⁷⁶⁸ P6396,p.3.

³⁷⁶⁹ P6396,p.3.

³⁷⁷⁰ M.TOHOLJ:T.42901; D4509,pp.3-4.

³⁷⁷¹ P5177,para.38. During this period, SMITH was also negotiating with MLADIĆ regarding ICRC access to the men of Srebrenica. R.SMITH:T.11437-11438; P2281,p.1.

³⁷⁷² P5177,p.3.

of Bosnian Muslims.³⁷⁷³ **KARADŽIĆ** either denied or ignored repeated requests by these agencies for access to the Srebrenica and Bratunac areas.³⁷⁷⁴

1046. The ICRC finally gained access to prisoners at Batković camp on 26 July and to the Bratunac-Srebrenica area on 27 July.³⁷⁷⁵ In the Bratunac-Srebrenica area they met with DERONJIĆ³⁷⁷⁶ and were "shown a number of empty detention centres".³⁷⁷⁷ By the end of the war, there were 171 Muslim men held at Batković, of whom the majority (save for a handful) had arrived on either 18 July or between 23 and 26 July 1995.³⁷⁷⁸ The ICRC was only able to register 164 prisoners from Srebrenica.³⁷⁷⁹

(c) **KARADŽIĆ** under pressure to find prisoners for exchange

1047. In August and September 1995, **KARADŽIĆ** was increasingly under pressure to secure the exchange of Serb PoWs held by the Muslim side.³⁷⁸⁰ The VRS exchange difficulties should have been solved by the capture of thousands of Muslim men from Srebrenica, but were instead exacerbated by the need to cover-up the murder of those prisoners while keeping the exchange process active. TOLIMIR complained that the Muslim side was making exchanges conditional upon "a larger number of Muslims from the area of Srebrenica and Žepa" than "we have in our prisons."³⁷⁸¹ The RS State Commission for Exchange of PoWs reported to **KARADŽIĆ** and others on 12 August 1995 that there were no more than a few hundred Muslim men from Srebrenica detained at Batković camp.³⁷⁸²

1048. At around this time, BEARA and KRSTIĆ led efforts, approved by **KARADŽIĆ** and MLADIĆ,³⁷⁸³ to retrieve from the Republic of Serbia Muslim men

³⁷⁷³ P5177.

³⁷⁷⁴ See e.g. P6396,p.203; P5177,pp.9,10,13. See also M.DMIČIĆ:T.42901.

³⁷⁷⁵ P5125,pp.1,3; P2284,para.409(p.90).

³⁷⁷⁶ P5125,p.3. See also P5125,p.3.

³⁷⁷⁷ P2284,para.409(p.90); R.SMITH:T.11440-11442.

³⁷⁷⁸ P5440.

³⁷⁷⁹ P2284,para.409(p.90). See also P4975.

³⁷⁸⁰ P5440;P5226,p.4; R.RADINOVIĆ:T.41629-41630.

³⁷⁸¹ See also P5226,p.2; P4975; D3869; R.BUTLER:T.27628-27629.

³⁷⁸² P4975,pp.2-3; R.BUTLER:T.27628-27629; R.RADINOVIĆ:T.41624-41627. See also R.RADINOVIĆ:T.41629-41630; D3869.

³⁷⁸³

See also P5358(BEARA refers to "their highest", which must be a reference to MILOŠEVIĆ); [REDACTED]; P5358.

who had fled across the River Drina from Žepa.³⁷⁸⁴ The VRS needed Muslim men from Žepa because they had "nobody to exchange."³⁷⁸⁵ [REDACTED]

[REDACTED]³⁷⁸⁶

1049. By mid-August, Republic of Serbia authorities had agreed to extradite Muslim men from Žepa for whom the RS authorities had compiled documentation showing the commission of international crimes.³⁷⁸⁷ BEARA, working in cooperation with the deputy head of the DB, Dragiša MIHIĆ, and others,³⁷⁸⁸ set about mobilising the entire RS military justice system to move all Žepa detainees, including the returned detainees, to a central location where they could be interviewed by an investigation team comprising VRS security officers, DB operatives, and members of the MUP, to gather information on the Muslim men still held in Serbia. The team was to be joined by a military prosecutor and investigating judges from Bijeljina, to be agreed by BEARA.³⁷⁸⁹ By this time, the ICRC had registered 44 prisoners from Žepa in Rogatica prison, and had had access to 796 men from Žepa in the FRY.³⁷⁹⁰

1050. The process established by BEARA did not involve the *bona fide* investigation of the commission of international crimes by Muslim PoWs. [REDACTED] Rather, these activities reveal the extent to which the VRS, DB and MUP were prepared to go in August to cover up the disappearance of thousands of Muslim men and boys. These activities also reflect the access that the VRS security organs, MUP and DB had to the military justice system which *could* have been used more appropriately to prosecute those responsible for the Srebrenica killings.

³⁷⁸⁴ [REDACTED]

³⁷⁸⁵ P4971,p.1; [REDACTED]; P5358; [REDACTED]

³⁷⁸⁶ [REDACTED]

³⁷⁸⁷ P2933,p.1(BEARA report to TOLIMIR 14 August 1995, p.1). *See also* D4859.

³⁷⁸⁸ P2933,p.2.

³⁷⁸⁹ P2933,pp.4-5(notably, access to the PoWs was to be denied during this process to the ICRC and UNHCR).

³⁷⁹⁰ P5177,para.52; P2284,para.409(p.89); R.SMITH:T.11441-11442; P5135,p.2.

³⁷⁹¹ [REDACTED]

(d) KARADŽIĆ took credit for Srebrenica and praised/rewarded perpetrators

1051. At the 52nd Assembly Session on 6 August 1995 **KARADŽIĆ** expressed his only regret regarding the Srebrenica operation—that 9,000 Muslim men were able to escape and survive:

Turks from Gorazde can break through whenever they feel like it, just as they could have taken Srebrenica again from us, nine thousand armed Turks in the mountains, in the woods. [...] That was an airborne division, nine thousand people, that's an airborne assault [...] and in the end several thousand fighters did manage to get through nevertheless, now the Srebrenica division was established, they were lined up in Tuzla and ordered to go back to Srebrenica. We were not able to encircle the enemy and destroy them, because we rushed into Žepa³⁷⁹²

1052. He was otherwise consistent in taking credit for the attack,³⁷⁹³ and praising those who had led it. On 20 July, he promoted ŽIVANOVIĆ to the rank of Lieutenant General, describing him and KRSTIĆ as the "main architect[s]" of the "Serbian victories in Srebrenica and Žepa", and congratulated the VRS-GŠ, DK command and "Staff of the Police Armed Forces" on the "brilliant victory in Srebrenica and Žepa".³⁷⁹⁴ Even in August 1995 when their relationship was at a low point,³⁷⁹⁵ **KARADŽIĆ** never criticised MLADIĆ for his role in the Srebrenica events. Instead he made efforts to shift responsibility for the success of the Srebrenica operation, and therefore his praise, onto "individual corps commanders",³⁷⁹⁶ singling out KRSTIĆ as a "great army leader."³⁷⁹⁷

1053. Other participants in the Srebrenica events were rewarded. On 7 August 1995, DB operatives, including RENOVICA and GLOGOVAC, were singled out for financial award by KIJAC as a result of their "extraordinary contribution and

³⁷⁹² P1412,p.17.

³⁷⁹³ P1415,p.86.

³⁷⁹⁴ As well as "crushing the offensive in Serbian Sarajevo". P4501; P.ŠKRBIĆ:T.25982-25984.

³⁷⁹⁵ When **KARADŽIĆ** dismissed MLADIĆ because of events in Western Slavonia. D3879; P5156,p.2; P2565; R.BUTLER:T.27879-27880; P.TREANOR:P2538,paras.305-313. *See also* R.THEUNENS:P3033,pp.568-578. *See also* III.C.8.(i).(iii).e:**KARADŽIĆ** retained control over MLADIĆ throughout the indictment period.

³⁷⁹⁶ P4555.

³⁷⁹⁷ P4555,00:00:30-00:00:47/P5121(partial duplicates). *See also* P2565,p.4. *See also* P1412,p.17; P6407,p.8.

engagement during the liberation of Žepa and Srebrenica".³⁷⁹⁸ On 20 October 1995, KOVAČ, then Minister of the Interior, awarded BOROVIČANIN early promotion to the rank of Colonel for "personal bravery, ability to command and control police units and special wartime services".³⁷⁹⁹ At a ceremony celebrating the one year anniversary of the 10th DOD on 14 October 1995, 10th DOD members KOS and ERDEMOVIĆ were promoted, in the presence of KRSTIĆ, PELEMIŠ, KOSORIĆ and POPOVIĆ.³⁸⁰⁰ KRSTIĆ congratulated the soldiers of the 10th DOD on completing all their tasks successfully and called them "Serbian heroes."³⁸⁰¹

(e) No investigation or prosecution of Srebrenica crimes

1054. There was never an investigation or prosecution by either the VRS³⁸⁰² or MUP³⁸⁰³ into the Srebrenica events, [REDACTED]

[REDACTED] The only Srebrenica-related prosecution ever initiated by the RS MUP—against US journalist David ROHDE—was to repress the investigation of Srebrenica crimes.³⁸⁰⁸ KOVAČ, KARIŠIK and KIJAC gave manifestly dishonest and inconsistent accounts as to why. KARIŠIK claimed that the information in the MUP's possession in 1995 was "very weak and insufficient", that "war crimes during those operations" were the responsibility of the Military Prosecutor,³⁸⁰⁹ and that the MUP was in any event re-subordinated to the VRS.³⁸¹⁰ KOVAČ said he knew in September 1995 "what the execution sites were",³⁸¹¹ but did not launch a MUP investigation for a number of unconvincing reasons: "the war", they "did not have the powers",³⁸¹² the RS was

³⁷⁹⁸ P4974.

³⁷⁹⁹ P5228.

³⁸⁰⁰ P4490,00:00:07-00:01:32; S.KOSORIĆ:T.38734-38735. D.ERDEMOVIĆ:T.25345-25348.

³⁸⁰¹ P4490,00:01:32-00:02:12.

³⁸⁰² P.DRINIĆ:P374,pp.35,48-49; [REDACTED]; P5120.

³⁸⁰³ T.KOVAČ:T.42819; T.KOVAČ:D3960,para.134; D.KIJAC:T.44372-44373;

M.KARIŠIK:T.40666-40668.

³⁸⁰⁵ [REDACTED]

³⁸⁰⁶ [REDACTED]

³⁸⁰⁷ [REDACTED]

³⁸⁰⁸ See V.G.3.(g):October 1995, ROHDE arrested.

³⁸⁰⁹ M.KARIŠIK:T.40666-40667.

³⁸¹⁰ M.KARIŠIK:T.40667-40668.

³⁸¹¹ T.KOVAČ:T.42810-42811.

³⁸¹² T.KOVAČ:T.42819.

about to "collapse", "there was a threat of a military coup", the situation was "completely chaotic", "there would have been a conflict between the army and the police".³⁸¹³ KIJAC claimed he received no information about the executions, both as head of the DB and later as Minister of the Interior.³⁸¹⁴

1055. In fact, any investigation of the Srebrenica events by RS MUP or VRS officers who were not involved in crimes was unimaginable because the Srebrenica crimes were directed and approved by **KARADŽIĆ**.

1056. Instead, the VRS, MUP and civilian authorities, with **KARADŽIĆ**'s involvement and oversight, colluded both in the cover-up of Srebrenica crimes, and efforts to repress their investigation, most significantly during reburial operations in September and October 1995,³⁸¹⁵ the arrest of David ROHDE in late October 1995,³⁸¹⁶ and the issuance in January/February 1996 of fake IDs to members of the 10th DOD who had participated in the massacre at Branjevo Farm.³⁸¹⁷ The cover-up of Srebrenica crimes by VRS, MUP and civilian authorities under **KARADŽIĆ**'s authority and control is additional confirmation that **KARADŽIĆ** shared the common criminal purpose of the JCE to Eliminate.

(f) September-October 1995, Reburial operations

1057. In September and October 1995, VRS and civilian authorities subordinate to **KARADŽIĆ** executed an organised and comprehensive effort to conceal the mass murders by exhuming bodies from primary mass graves (including Glogova, Orahovac (Lažete), Petkovci Dam, Kozluk and Branjevo Military Farm) and transferring them to secondary graves.³⁸¹⁸

1058. The reburial operation was an enormous coordinated effort,³⁸¹⁹ involving cooperation as between different state structures³⁸²⁰ and access to significant RS state

³⁸¹³ T.KOVAČ:D3960,para.134.

³⁸¹⁴ D.KIJAC:T.44372.

³⁸¹⁵ See V.G.3.(f):September-October 1995, Reburial Operations.

³⁸¹⁶ See V.G.3.(g):October 1995, ROHDE arrested.

³⁸¹⁷ See V.G.4.(a):February 1996, 10th DOD soldiers issued fake IDs.

³⁸¹⁸ AF1864; AF1872; AF1875-AF1879; AF1889; P4512,pp.6-7; D.MANNING:T.25803-25804; D.JANC:T.26961-26962; P4772,pp.47-84. See Srebrenica Narrative,paras.62-64(Glogova),103-106(Orahovac),112-113(Petkovci Dam),123-124(Kozluk),142-144(Branjevo Military Farm).

³⁸¹⁹ M.NIKOLIĆ:T.24689-24690.

resources.³⁸²¹ Although intended to be conducted in secrecy,³⁸²² the operation was, by virtue of its nature and scale, common knowledge.³⁸²³ Orders concerning the reburials came from the highest levels of the RS military and civilian authorities, including MLADIĆ³⁸²⁴ and M.DERONJIĆ.³⁸²⁵ In the circumstances, the reburial operation must have been approved by KARADŽIĆ. Evidencing his approval, KARADŽIĆ said to MLADIĆ in March 1996:

A big show was put on for ALBRIGHT, she expected they would find 1,200 Muslim bodies /?at/ Pilica, but they found some five bodies.³⁸²⁶

1059. It was only possible to put on a "big show"³⁸²⁷ for ALBRIGHT because the majority of bodies buried at Branjevo Farm had by then been removed and reburied. Of the 1,735 victims identified from the Branjevo Farm grave and its related secondary graves as of January 2012, only 138 bodies were found in the Branjevo Farm primary grave; the rest had been removed to secondary graves.³⁸²⁸

(i) Zvornik reburials

1060. VRS security organs led the reburial operation in the Zvornik area. [REDACTED]
[REDACTED]
[REDACTED] but that same day MLADIĆ issued an order to provide TRBIĆ with the fuel for "engineering

³⁸²⁰ AF1865; AF1868-1869. *See e.g.* P4592; P4593; P4391; M.NIKOLIĆ:T.24688-24690;; D2081,para.13; [REDACTED];

³⁸²¹ M.NIKOLIĆ:T.24689-24690.

³⁸²² M.NIKOLIĆ:T.24690. *See also* R.BUTLER:P4914,para.11.0.

³⁸²³ M.NIKOLIĆ:T.24689-24690; M.KATANIĆ:P4374,para.98. *See also* D.ĐUKANOVIĆ:P407,para.7; D.ĐUKANOVIĆ:P408,para.10.

³⁸²⁴ *See* P4592; P4593; AF1865.

³⁸²⁵ [REDACTED]

M.KATANIĆ:P4374,paras.59,70.

³⁸²⁶ P1490,p.47. *See* J.RUEZ:T.23840-23842; P4308,p.221.

³⁸²⁷ P1490,p.47.

³⁸²⁸ P4772,pp.40-42,83. *See also* Srebrenica Narrative,paras.142,144.

³⁸²⁹ [REDACTED]

³⁸³⁰ [REDACTED]

³⁸³¹ [REDACTED]

works".³⁸³² [REDACTED]

POPOVIĆ's involvement in managing and overseeing the reburials is further evident from a 22 September conversation in which he inquired about the status of the fuel and personnel assigned to the operation.³⁸³⁴

1061. Within the Zvornik Brigade, Drago NIKOLIĆ was responsible for the operation.³⁸³⁵ [REDACTED]

1062. Zvornik Brigade Engineering Company leaders D.JOKIĆ and S.BOGIČEVIĆ assigned Company member D.LAZAREVIĆ to the reburial operation.³⁸³⁷ D.LAZAREVIĆ was given a list of personnel and was told to exhume and transfer the bodies.³⁸³⁸ Some Engineering Company operators who had taken part in the original burials, and personnel from other Brigade units were involved.³⁸³⁹ TRBIĆ coordinated, evaluating after every job.³⁸⁴⁰ D.NIKOLIĆ and Brigade MPs provided traffic security.³⁸⁴¹

1063. The Orahovac (Lažete 1 and 2), Kozluk, and Branjevo Farm grave sites were exhumed, mostly at night.³⁸⁴² The operation took five or six days.³⁸⁴³

(ii) Bratunac reburials

1064. VRS security organs also led reburials in the Bratunac area. In September 1995,³⁸⁴⁴ POPOVIĆ told M.NIKOLIĆ that the VRS-GŠ had ordered the operation,

³⁸³² P4592; P4593. *See* [REDACTED]; P4914, paras.11.2-11.3. *See also* AF1870.

³⁸³³ [REDACTED].
³⁸³⁴ P5360 (identifying POPOVIĆ and someone identified as "Mihalic", who POPOVIĆ calls familiarly "Nido"; "Nido" reciprocates with "Pop.>"). [REDACTED]

³⁸³⁵ AF1869. *See also* AF1866;

³⁸³⁶ [REDACTED].
³⁸³⁷ D.LAZAREVIĆ: P352, pp.40, 88.

³⁸³⁸ D.LAZAREVIĆ: P352, pp.39-40.

³⁸³⁹ D.LAZAREVIĆ: P352, pp.39-40, 56, 60-62, 71, 85-86. *See also* [REDACTED]

³⁸⁴⁰ D.LAZAREVIĆ: P352, pp.60-62. *See also* P5360.

³⁸⁴¹ AF1871. *See also* [REDACTED]

³⁸⁴² D.LAZAREVIĆ: P352, pp.41, 56-57, 73, 92.

³⁸⁴³ D.LAZAREVIĆ: P352, pp.58-59, 73-74.

³⁸⁴⁴ M.KATANIĆ: P4374, para.98; D.ĐUKANOVIĆ: P407, para.7; D.ĐUKANOVIĆ: P408, para.10.

dubbed "asanacija", and ordered him to relocate the Glogova grave.³⁸⁴⁵ Bratunac Brigade MPs and Bratunac civilian police secured the Konjević Polje-Bratunac and Bratunac-Ljubovija roads, diverting traffic.³⁸⁴⁶

1065. Civilian authorities were also involved.³⁸⁴⁷ M.DERONJIĆ assigned the Bratunac Civilian Protection to assist, under Momir NIKOLIĆ's direction.³⁸⁴⁸ This included drivers and vehicles from the RAD Public Utility Company, which the Civilian Protection would engage as needed.³⁸⁴⁹ Other local enterprises' machinery was also requisitioned.³⁸⁵⁰

1066. Reburials occurred at night.³⁸⁵¹ The operation lasted until late October.³⁸⁵²

(g) October 1995, ROHDE arrested

1067. On 29 October 1995, journalist David ROHDE was arrested by the DB. He had been taking photographs of "a number of facilities" where he had information that Muslim men from Srebrenica had been detained, and was found with two military maps of the Srebrenica and Zvornik areas, with crime sites "clearly marked."³⁸⁵³ ROHDE was gathering evidence of atrocities.³⁸⁵⁴ KIJAC sent a dispatch to the VRS-GŠ Security Administration with this information on 31 October.³⁸⁵⁵ He also noted that forthcoming articles about the Srebrenica events in the New York Times and Washington Post would talk about "6,000 victims" and "about 3,000" respectively.³⁸⁵⁶ The DB received a follow-up from BEARA on 3 November.³⁸⁵⁷

³⁸⁴⁵ M.NIKOLIĆ:T.24688-24689; M.NIKOLIĆ:D2081,para.13; AF1868; M.KATANIĆ:P4374,para.98. *See also* AF1866.

³⁸⁴⁶ M.NIKOLIĆ:T.24689.

³⁸⁴⁷ M.NIKOLIĆ:T.24689. *See e.g.* [REDACTED]

³⁸⁴⁸ [REDACTED]

³⁸⁴⁹ M.NIKOLIĆ: T.24689; [REDACTED].

³⁸⁵⁰ M.NIKOLIĆ:T.24689.

³⁸⁵¹ [REDACTED];

D.DUKANOVIĆ:P407,para.7;

D.DUKANOVIĆ:P408,para.10.

³⁸⁵² P4391; M.NIKOLIĆ:T.24688; M.NIKOLIĆ:D2081,para.13; AF1865.

³⁸⁵³ P5227, p.1.

³⁸⁵⁴ P5227. In a Christian Science Monitor article published on 18 August ROHDE had described how he had visited the alleged sites of mass graves and executions, and found evidence of killings. P6422. *See* P3187.

³⁸⁵⁵ P5227,p.1.

³⁸⁵⁶ P5227,p.2.

³⁸⁵⁷ P6539; KIJAC gave evidence that his 31 October dispatch was not addressed to BEARA, but to the VRS Intelligence Administration. He said the DB "had no correspondence with the military police and the military security" and their telegrams "were never sent to Colonel BEARA". D.KIJAC:T.44358-44359. This was not true because his report was addressed to the VRS-GŠ "Security Administration" of

1068. BEARA told the DB on 3 November that ROHDE had been reported missing and the UN was trying to locate him.³⁸⁵⁸ This prompted Goran RADOVIĆ to issue an order that day, authorising ROHDE's detention retroactively from 29 October to 6 November 1995. RADOVIĆ also issued a request to initiate criminal proceedings.³⁸⁵⁹ The only reasonable inference is that the detention order and request were a response to information received from BEARA; an effort to give ROHDE's detention a veneer of legality in the face of international efforts to locate him.

1069. ROHDE was charged with entering the RS using falsified personal documents and for taking photographs of Petkovci Dam.³⁸⁶⁰ **KARADŽIĆ** "acquitt[ed]" ROHDE on 8 November.³⁸⁶¹ **KARADŽIĆ** claimed that ROHDE had been tasked with obtaining "classified military and other intelligence in the combat operations zone in [...] Zvornik municipality",³⁸⁶² when he must have known, through his contacts with both KIJAC and KOVAČ, that ROHDE was investigating the Srebrenica events.³⁸⁶³

4. Continued Cover-Up of Srebrenica Crimes

(a) February 1996, 10th DOD soldiers issued fake IDs

1070. On 16 January 1996, at the request of SALAPURA, KIJAC, then Minister of the Interior, ordered KARIŠIK to issue fake IDs for eight members of the 10th DOD who were "foreign citizens or on a list of individuals who have been indicted by the [ICTY]".³⁸⁶⁴ Fake IDs were thereafter issued³⁸⁶⁵ to members of the 10th DOD,³⁸⁶⁶ including ERDEMOVIĆ, KOS and one other, who had participated in the executions of Muslim men at Branjevo Farm on 16 July 1995.³⁸⁶⁷ Defence witnesses KIJAC and

which BEARA was Chief. P5227,p.1. BEARA's follow-up referenced KIJAC's dispatch. P6539,p.1. KIJAC also claimed he saw BEARA's telegram for the first time in court. D.KIJAC:T.44358.

³⁸⁵⁸ P6539.

³⁸⁵⁹ P6423; P6424; D.KIJAC:T.44354-44355.

³⁸⁶⁰ P6424; D.KIJAC:T.44354-44356; P6425; P6426. *See also* D.KIJAC:T.44376.

³⁸⁶¹ P6425; P6426,p.3.

³⁸⁶² P6425.

³⁸⁶³ P5227; P6426,p.3. *See also* T.KOVAČ:T.42820-42822. **KARADŽIĆ**'s agenda records that he spoke to both KIJAC and KOVAČ by telephone on 7 November and met with KOVAČ on 8 November. P2242,pp.133-134.

³⁸⁶⁴ P4491; D.ERDEMOVIĆ:T.25353-25354. P4491 was issued to the head of the RJB, who at the time was KARIŠIK. M.KARIŠIK:D3749,para.33.

³⁸⁶⁵ D.ERDEMOVIĆ:T.25351,25354(in January or February).

³⁸⁶⁶ D.ERDEMOVIĆ:T.25351-25354; D.KIJAC:T.44365; F.KOS:T.42416-42417. *See also* P.SALAPURA:T.40287-40288.

³⁸⁶⁷ D.ERDEMOVIĆ:T.25353; P.SALAPURA:T.40288-40289.

SALAPURA gave incredible and conflicting accounts as to what the request and order related to. KIJAC claimed it was "standing practice" between the MUP and military for the MUP to issue false IDs to members of the military when "their people" needed to travel abroad;³⁸⁶⁸ he did not know "who these passports were made for."³⁸⁶⁹ SALAPURA conceded that amongst the men issued fake IDs were "three or four" perpetrators of the Branjevo Farm executions,³⁸⁷⁰ but that the VRS Intelligence Administration wanted simply to protect these men against anyone "taking law into their own hands";³⁸⁷¹ the goal was to have "these people" "brought before justice".³⁸⁷² In fact, KIJAC's order speaks for itself. The only reasonable inference is that the BSL—a "grateful" state³⁸⁷³—were protecting these individuals and themselves from arrest and transfer to the ICTY.

(b) March-April 1996, **KARADŽIĆ** ordered cover-up investigations

1071. On 22 March 1996, **KARADŽIĆ** expressed concern to MLADIĆ that "those two would sell the story about [...] Srebrenica to The Hague".³⁸⁷⁴ **KARADŽIĆ** was referring to ERDEMOVIĆ, one of the members of the 10th DOD issued a fake ID in February, and ERDEMOVIĆ's former deputy commander, KREMENOVIĆ.³⁸⁷⁵ That day, an interview with ERDEMOVIĆ was published in *Slobodna Bosna*. He gave an account of the executions of Muslim men at Branjevo Farm ("Pilice farm") and at the Pilica Cultural Centre.³⁸⁷⁶ He said that "1,200" Muslim men were executed at Branjevo Farm, "all of them civilians".³⁸⁷⁷

1072. In his diary entry for 22 March, MLADIĆ noted **KARADŽIĆ**'s comments about ALBRIGHT's visit to the Pilica area: that a "big show" was put on for her, and

³⁸⁶⁸ D.KIJAC:T.44364-44365.

³⁸⁶⁹ D.KIJAC:T.44366.

³⁸⁷⁰ P.SALAPURA:T.40285-40289. He also testified that KIJAC knew their identity and gave his approval for the issuance of false IDs. P.SALAPURA:T.40288.

³⁸⁷¹ P.SALAPURA:T.40288-40289.

³⁸⁷² P.SALAPURA:T.40287.

³⁸⁷³ F.KOS:T.42414. *See also* V.G.2.(s):16-17 July, BEARA and POPOVIĆ arranged logistics.

³⁸⁷⁴ P1490,p.47; D.ERDEMOVIC:T.25356. In early 1996 his ICTY indictment and potential arrest were a matter of concern for MLADIĆ, and something he was discussing with others: P1490, pp.27-28,35.

³⁸⁷⁵ D.ERDEMOVIC:T.25356. ERDEMOVIĆ had contacted the media with KREMENOVIĆ. Both were arrested by the Republic of Serbia DB shortly thereafter, then transferred to the ICTY.

D.ERDEMOVIC:T.25354-25356. *See also* D.KIJAC:T.44368.

³⁸⁷⁶ P6451.

³⁸⁷⁷ P6451,p.2.

that she had expected to "find 1,200 Muslim bodies".³⁸⁷⁸ Confronted with **KARADŽIĆ**'s admission of a cover-up, KOVAČ nevertheless testified that MLADIĆ's diary entry did not "fit into covering up crimes";³⁸⁷⁹ then said that his diary was a "construct", not the "writings of a normal person" and "[t]here are quite a few elements of schizophrenia here".³⁸⁸⁰

1073. Under obvious international pressure, **KARADŽIĆ** proposed at his meeting with MLADIĆ on 22 March: "a commission to be formed on the basis of equal parity to really investigate all the deaths and killings around Srebrenica during the war".³⁸⁸¹ He also suggested—if "they", meaning international actors, "expand the campaign"—a "joint commission" "to investigate the killing of every individual."³⁸⁸² On 23 March, **KARADŽIĆ** ordered the VRS-GŠ and MUP to set up a "mixed expert commission" of three members each

to fully investigate and determine the facts regarding the alleged discovery of two decomposed bodies at the scene of earlier battles with the Muslim side in the Pilica area, Zvornik Municipality.³⁸⁸³

1074. The order's very wording provided the basis for a cover-up, because there were no "battles" in the "Pilica area" in July 1995;³⁸⁸⁴ specifically, no battles at Branjevo Farm or the Pilica Dom.³⁸⁸⁵ The commission's membership (MUP and VRS) assured that there would be no real investigation. This was confirmed by a meeting on 25 March 1996, chaired by CSB Zvornik Chief, VASIĆ, and attended by

³⁸⁷⁸ P1490,p.47. **KARADŽIĆ** also informed MLADIĆ that Dragiša "MILIĆ" "will come and he will show a cassette about her visit". P1490,p.47. See also P4369,p.27. The figure of "1,200 Muslim bodies" came from ERDEMOVIĆ's interview. P1490,p.47; P6451,p.2; D.ERDEMOVIĆ:T.25356. See also R.RADINOVIĆ:T.41583-41584. See also V.G.3.(f):September-October 1995, Reburial Operations.

³⁸⁷⁹ T.KOVAČ:T.42847.

³⁸⁸⁰ T.KOVAČ:T.42848.

³⁸⁸¹ P1490,p.47.

³⁸⁸² P1490,p.47.

³⁸⁸³ P3163,pp.6,8. Defence expert witness RADINOVIĆ testified that the 23 March 1996 order demonstrated that **KARADŽIĆ** did not know there was no fighting in the Pilica area, that he did not know about the Pilica Dom killings, that he was bombarded with information from the media and "international factors" about war crimes after the fall of Srebrenica but "was not convinced" because the VRS-GŠ did not report such events to him, so he considered the allegations to be propaganda. R.RADINOVIĆ:D3864,paras.425-427; R.RADINOVIĆ:T.41583-41585. This evidence should be dismissed because it is plainly incredible given the information then available to **KARADŽIĆ** (including ERDEMOVIĆ's interview, P6451), and because RADINOVIĆ was an unreliable witness. See DCC(R.RADINOVIĆ). KOVAČ bizarrely testified that MLADIĆ's diary "is a construct"; "I do not think these are writings of a normal person"; "[t]here are quite a few elements of schizophrenia here". T.KOVAČ:T.42848. His evidence should be dismissed.

³⁸⁸⁴ P3163,pp.6,8. See also R.RADINOVIĆ:D3864,para.427.

³⁸⁸⁵ D.ERDEMOVIĆ:T.25357.

TRBIĆ on behalf of the Zvornik Brigade.³⁸⁸⁶ Both were deeply involved in the Srebrenica events.³⁸⁸⁷ P.DRINIĆ, a Bijeljina Military Prosecutor who attended this meeting "by accident",³⁸⁸⁸ reported afterwards to the VRS-GŠ Sector for Intelligence and Security Affairs, proposing that the "Intelligence and Security Organ members" of the commission "obtain accurate information [...] through on-site intelligence work".³⁸⁸⁹ The VRS security organ—BEARA's "men"—was supposed to collect additional information for submission to the military prosecutor.³⁸⁹⁰ Unsurprisingly, P.DRINIĆ received no response.³⁸⁹¹ He noted that "[n]one of the people present knew any details [o]f the locality and [o]f the actions that needed to be undertaken nor was anyone informed about what would be found on site, or else no one wanted to know."³⁸⁹² Of course, VASIĆ and TRBIĆ knew exactly what was to be found in the Pilica area. As revealed by the accidental presence of a military prosecutor who, alone, was not implicated in the Srebrenica events, this meeting was not intended to achieve anything. Like **KARADŽIĆ**'s order it was a sham; intended to cover-up the Srebrenica crimes.

1075. On 1 April 1996, **KARADŽIĆ** issued a further order for an investigation that was never intended to happen:

a detailed investigation be carried out of the locations where victims of the armed conflict in and around Srebrenica are to be found [...]

It should be most properly investigated whether any intentional murder of civilians, of wounded or of prisoners of war occurred³⁸⁹³

1076. The RS Military Prosecutor's office did not receive the order.³⁸⁹⁴ KIJAC, then Minister of the Interior, did not "recall" receiving it.³⁸⁹⁵ In any event, it was never implemented.³⁸⁹⁶ By this time both **KARADŽIĆ** and MLADIĆ were indicted by the

³⁸⁸⁶ P.DRINIĆ:P374,pp.35-40; P3163,pp.4,6.

³⁸⁸⁷ TRBIĆ was also involved, with D.NIKOLIĆ, in the cover-up reburial operations. *See* V.G.3.(f):September-October 1995, Reburial Operations.

³⁸⁸⁸ P.DRINIĆ:P374,p.35.

³⁸⁸⁹ P3163,p.4.

³⁸⁹⁰ P.DRINIĆ:P374,pp.39-40. *See* P3163,p.4(handwriting on top right hand corner: "for BEARA").

³⁸⁹¹ P.DRINIĆ:P374,p.40; P3163,p.5.

³⁸⁹² P3163,p.3.

³⁸⁹³ P164.

³⁸⁹⁴ P.DRINIĆ:P374,pp.41-42.

³⁸⁹⁵ D.KIJAC:T.44372.

³⁸⁹⁶ P.DRINIĆ:P374,pp.42-44.

ICTY for Srebrenica crimes.³⁸⁹⁷ This order was intended to cover up, rather than investigate, their crimes.³⁸⁹⁸

1077. As Minister, KIJAC never conducted an investigation into the Srebrenica events.³⁸⁹⁹ However, as is evidenced by his 23 September 1996 report—"concerning the period when Srebrenica was liberated"³⁹⁰⁰—he and the MUP collected "new information" about "the area of Srebrenica",³⁹⁰¹ including information that "could be used for the defence."³⁹⁰² By "the defence",³⁹⁰³ he must have meant the defence of ICTY indictees, MLADIĆ and **KARADŽIĆ**.³⁹⁰⁴ In this report, KIJAC described allegations by two "eyewitnesses" that a Muslim commander had shot Muslims in the column, and created "'chain' killings and suicides."³⁹⁰⁵ He also described members of IFOR forces "documenting war crimes allegedly committed by the VRS against the population of Srebrenica", "exhumations in the area of Kasabe near Milići", "witnesses" who had been taken to The Hague and that "judges of the Tribunal, insisted [...] on proving the direct participation of the President of RS and the Chief of the VRS Main Staff."³⁹⁰⁶ KIJAC had the capacity to investigate the Srebrenica crimes, just as he did on taking up office as Minister in December 1995, but he chose not to do so; instead selectively collecting "information" for use in covering up the crimes.

5. **KARADŽIĆ**'s state of knowledge

1078. **KARADŽIĆ** has claimed that he "did not receive any information about mistreatment of civilians" or "any information of even individual murders in Srebrenica".³⁹⁰⁷ He claims he only ever heard "rumours" about Srebrenica crimes which he did not trust or verify, and because he would have come into conflict with

³⁸⁹⁷ See Original Indictment.

³⁸⁹⁸ KOVAČ's inconsistent evidence on this issue should be dismissed as irrelevant and in any event not credible. T.KOVAČ:T.42815-42819,42844-42845. See also P6202.

³⁸⁹⁹ D.KIJAC:T.44371-44372.

³⁹⁰⁰ P165,p.2.

³⁹⁰¹ P165,p.1.

³⁹⁰² P165,p.1.

³⁹⁰³ P165,p.1.

³⁹⁰⁴ KIJAC said his report related to "talks" which the Ministry of Justice had started with representatives of the ICTY. D.KIJAC:T.44371.

³⁹⁰⁵ P165,p.1.

³⁹⁰⁶ P165,p.1.

³⁹⁰⁷ Rule 84bis Statement:T.28877.

the army if he had accused it "for the umpteenth time".³⁹⁰⁸ These claims are both incredible and untrue.

1079. The streams of information available to him during the Srebrenica events were more than sufficient to put him on notice, almost immediately, of the Srebrenica crimes, including the mass executions of Muslim men. His active efforts to deflect international attention from the Srebrenica events, allowing the crimes to proceed unchecked, in and of itself constitutes a substantial contribution to the JCE to Eliminate.

1080. Information concerning the mass executions in the Zvornik area was [REDACTED]
[REDACTED]
[REDACTED] VRS and RS MUP reporting during the Srebrenica events described the capture, surrender, and execution of large numbers of Muslim men.³⁹¹⁰ The numbers of Muslim prisoners were widely known and discussed amongst **KARADŽIĆ**'s subordinates.³⁹¹¹ These figures were also reported by international organisations;³⁹¹² and the evidence shows that **KARADŽIĆ** was aware of these reports.³⁹¹³ **KARADŽIĆ** even visited Srebrenica on 4 August 1995³⁹¹⁴ and met with civilian officials, including Milenko KATANIĆ, DERONJIĆ and representatives of the civilian authorities of Srebrenica.³⁹¹⁵

³⁹⁰⁸ Rule 84bis Statement:T.28878-28879.

³⁹⁰⁹ [REDACTED] See also N.JEREMIĆ:P348,pp.11,37; [REDACTED].

³⁹¹⁰ See V.D.1:Functioning reporting chain.

³⁹¹¹ M.JANJIĆ:P1194,pp.20,22-23,31-32; P5374,pp.2-3/P4945(partial duplicates); P5374(B/C/S)/P4945(B/C/S)(partial duplicates); P4201,V000-9016,00:27:50-00:28:17; P4202,pp.137,147,278(member of the Jahorina Recruits near Sandić Meadow, 13 July:"three to four thousand" have come out.); P2987,p.2; P247; P5380;P4670,p.1; P168; P5074,p.1; P181; R.FRANKEN:P4175,para.112 (at some point after 11 July, JANKOVIĆ told FRANKEN that the Serbs had 6,000 PoWs); P4949; D1970,p.1; P4464,p.3; P4457,p.3. Around 14 July, Serbian MUP officer KDZ446 was told at the Zvornik Brigade HQ that BEARA had ordered that "6,900 people had to disappear within five days". KDZ446:P29,pp.40-41. See also [REDACTED]

[REDACTED] See also V.G.1.(f):11 July, First Meeting at Hotel Fontana.

³⁹¹² See V.G.2.(t):**KARADŽIĆ** denied access to the Srebrenica area and lied to the media; V.G.3.(b): **KARADŽIĆ** maintained restrictions on access.

³⁹¹³ See V.G.2.(t):**KARADŽIĆ** denied access to the Srebrenica area and lied to the media; V.G.3.(b): **KARADŽIĆ** maintained restrictions on access.

³⁹¹⁴ P2242,p.102; P2845. KIJAC arranged **KARADŽIĆ**'s security for the trip, in cooperation with the VRS security organs. P2784; P2844; N.RISTIĆ:T.15394-15404,15419-15423,15437-15440; M.KATANIĆ:T.24548. See P2843.

³⁹¹⁵ M.KATANIĆ:P4374,paras.96-97; M.KATANIĆ:T.24545-24546. *Contra* N.RISTIĆ:T.15419-15420(N.RISTIĆ testified that as far as he remembered, they did not visit local authorities, and that

1081. International press and UN reporting³⁹¹⁶ represent the minimal limits of what **KARADŽIĆ** must have known, even if all regular reporting chains through the MUP, DB, VRS and civilian authorities were dysfunctional—and the evidence is clear that they were not.³⁹¹⁷ **KARADŽIĆ** was sensitive to the world's reaction to Bosnian Serb actions in Srebrenica, and closely monitored the western press from his office in Pale.³⁹¹⁸ By the end of July, the mass displacement and executions of Bosnian Muslims from Srebrenica had been widely reported.³⁹¹⁹ On 25 July, for instance, *The Independent* newspaper reported the mass execution of Muslim men on the banks of the River Drina, witnessed by Serbs living on the opposite bank, in Loznica, Serbia.³⁹²⁰ In addition, **KARADŽIĆ** received direct notice from the UN Special Rapporteur of several thousand missing Muslim men and a request for access to the area, which he ignored.³⁹²¹

1082. In reaction to the consistent flow of negative media reporting, **KARADŽIĆ** and his associates used the RS media to propagate lies about the treatment of Bosnian Muslims following Srebrenica's takeover.³⁹²² In an interview with the BBC on 13 July, ZAMETICA justified the separation of men, claiming they were being questioned about crimes against Serb civilians.³⁹²³

1083. In early November 1995, as negotiations at Dayton were ongoing, **KARADŽIĆ** gave a press interview in which he stated "nothing happened" after the takeover of Srebrenica; that the issue was a "propaganda trick in the run up to the

there were no "encounters" with military or civilian authorities). On 19 November **KARADŽIĆ** also reviewed RS MUP special units and attended a ceremony in Zvornik. P5184; P2242,p.139.

³⁹¹⁶ See V.G.2.(t):**KARADŽIĆ** denied access to the Srebrenica area and lied to the media; See V.G.3.(b):**KARADŽIĆ** maintained restrictions on access.

³⁹¹⁷ See V.D:Reporting Chain to **KARADŽIĆ**.

³⁹¹⁸ R.ĐURĐEVIĆ:P4513,pp.13,15-16(noting that during his meeting with **KARADŽIĆ** in Pale on 14 July, "there were a couple of TV sets he was watching the whole time, not realizing he was getting his information the same way we get ours to us, from CNN and Sky News." **KARADŽIĆ** was commenting on the coverage and making disparaging remarks about those being interviewed); R.ĐURĐEVIĆ:T.25905-25906; P4514(noting how **KARADŽIĆ** "would then flick back and forth between CNN and Sky News, his main sources of information about the world's reaction to his latest moves"). See also V.MATOVIĆ:D4184,p.2; S.RISTIĆ:P4556,pp.55-57,64,74(watched CNN with **KARADŽIĆ**); S.TRIFKOVIĆ:D2905,paras.32-33; P2242,p.91.

³⁹¹⁹ See e.g. P4400; P6395; P6394.

³⁹²⁰ P4401; R.BLOCK:P4393,paras.35-41; R.BLOCK:T.24919-24920,24932-24936.

³⁹²¹ See V.G.3.(b):**KARADŽIĆ** maintained restrictions on access.

³⁹²² See V.G.2.(t):**KARADŽIĆ** denied access to the Srebrenica area and lied to the media. See V.G.2.(v):17 July, **KARADŽIĆ** lied to the international media.

³⁹²³ P6475,p.3.

negotiations in Dayton".³⁹²⁴ **KARADŽIĆ** denied allegations that the VRS was responsible for the disappearance of large numbers of Muslim men, saying "'the puzzle is simple' [...] 'the actual number of the Muslims of Žepa and Srebrenica was smaller than the number they had reported in order to get more humanitarian aid, which was later distributed among their soldiers'."³⁹²⁵ In a CNN interview on 28 November 1995—after **KARADŽIĆ** and MLADIĆ were indicted by the ICTY³⁹²⁶—**KARADŽIĆ** claimed he had ordered an investigation "about any allegations and among them about Srebrenica". He denied any mass killings, claiming that the inflated figures were a result of Muslims misstating the number of refugees in Srebrenica to get more aid.³⁹²⁷

1084. Defence witnesses who denied hearing about the Srebrenica crimes from the media or UN reports were dishonest or otherwise unreliable.³⁹²⁸ **DMIČIĆ** and **MILINIĆ**, for example, were unable, even today, to acknowledge the truth that thousands of men were killed in Srebrenica.³⁹²⁹ **MILINIĆ** testified:

[t]he Srebrenica graveyard is one big farce [...] The Serbs were set up with the whole thing. I will never acknowledge it.³⁹³⁰

6. **KARADŽIĆ** obstructed ICTY investigations

1085. In an intercepted conversation on 24 April 1996, **KARADŽIĆ** instructed his interlocutor from Banja Luka not to give documents to ICTY investigators.³⁹³¹ While a fugitive, in the months and years later, **KARADŽIĆ** directed close associates, including **TOHOLJ** and **VUKAŠINOVIĆ**,³⁹³² to identify, remove, hide or destroy incriminating documents.³⁹³³

³⁹²⁴ P6410,p.4.

³⁹²⁵ P6410,p.4.

³⁹²⁶ Original Srebrenica Indictment.

³⁹²⁷ P6202; D4490,p.4. *See also* T.36300-36301.

³⁹²⁸ *See e.g.* M.DMIČIĆ:T.42897-42898; G.MILINIĆ:T.39793; B.SUBOTIĆ:T.40085-40094. *See* DCC(M.DMIČIĆ); DCC(G.MILINIĆ); DCC(B.SUBOTIĆ).

³⁹²⁹ M.DMIČIĆ:T.42902-42903; G.MILINIĆ:T.39793. *See also* M.TOHO LJ:T.42957-42958; P6488,pp.2-3.

³⁹³⁰ G.MILINIĆ:T.39793.

³⁹³¹ P4835.

³⁹³² P6489,p.2; [REDACTED]; P6291,p.2; P4370. *See also* [REDACTED].

³⁹³³ *See e.g.* [REDACTED] P4370; P6489.

1086. [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED] Those with custody of the archives were **KARADŽIĆ**'s close associates, former Presidential advisers **SUBOTIĆ**, **DMIČIĆ** and **MILINIĆ**.³⁹⁴¹

1087. **KARADŽIĆ** was personally and directly involved in ensuring that incriminating documents would be withheld or destroyed.³⁹⁴² He requested that he be informed "at least once a day [...] on how things are going"³⁹⁴³ and was regularly updated about the ICTY's investigation.³⁹⁴⁴ He was given specific information about disclosed documents,³⁹⁴⁵ and informed about the destruction of unfavourable documents³⁹⁴⁶ and those which, if found, "would invalidate/revoke all documents in your defense".³⁹⁴⁷ [REDACTED]

[REDACTED] **KARADŽIĆ**'s family was also actively involved in concealing of documents and records identified by **KARADŽIĆ**.³⁹⁴⁹

1088. **KARADŽIĆ** coordinated with other RS officials and organs, including RS TV and the SDS, in his attempt to hide evidence.³⁹⁵⁰ **KARADŽIĆ** gave specific

3934 [REDACTED]
 3935 [REDACTED]; G.MILINIĆ:T.39734.
 3936 [REDACTED]

3938 [REDACTED] G.MILINIĆ:T.39734.
 3939 [REDACTED]
 3940 [REDACTED]

3941 P6397,pp.1-2.
 3942 [REDACTED]

3943 P6399,p.1.
 3944 [REDACTED]

[REDACTED] See e.g. [REDACTED];
 P6489,p.1; P4835.

3945 See e.g. [REDACTED]; P6489,p.1.
 3946 [REDACTED]

3947 P4370.
 3948 See e.g. [REDACTED]

3949 [REDACTED]; [REDACTED].
 3950 P6399,p.1; [REDACTED]; P6489. This also contradicts the Accused's suggestion that it

would be difficult to hide all copies of documents from the Presidential archives as there would always be copies elsewhere. M.MIHAILOVIĆ:T.24310,24314 ; [REDACTED].

instructions, including for example with respect to the review of television footage, "personally review every segment [...] and select those favourable to us and detrimental to the Muslims."³⁹⁵¹ **KARADŽIĆ** also instructed VUKAŠINOVIĆ to "determine the associates from the TV and the costs, that is, the fees, in order to have everything reviewed before it's offered to them. There should be nothing else outside of that which you will have reviewed".³⁹⁵²

1089. To cover-up his actions, **KARADŽIĆ** instructed VUKAŠINOVIĆ to lie about the whereabouts of TV footage which was not disclosed. He was told to say, "[n]othing else exists because the archives have been moved, destroyed and so forth".³⁹⁵³ Similarly he suggested with regards to the SDS archives, "[t]he best would be if the archives did not exist at all because the party was frozen for a year".³⁹⁵⁴ As a result of **KARADŽIĆ**'s actions, misinformation was spread that the archives had been stolen by Mauzer's men.³⁹⁵⁵

1090. **KARADŽIĆ**'s position that the only documents withheld were those implicating state secrets³⁹⁵⁶ is false and conflicts with his own contemporaneous statements. A letter from **KARADŽIĆ** to VUKAŠINOVIĆ on 8 February 1998 is instructive:

There are many statements that go to my and our advantage. Everything else needs to be darkened out, it doesn't exist [...] They have received that which we, too, were interested in, and now we should be discretely obstructing them [...] The more good documents and the less bad ones they have, the easier it will be for them to work in our favour.³⁹⁵⁷

³⁹⁵¹ P6490,p.1.

³⁹⁵² P6490,p.1.

³⁹⁵³ See P6490,p.1.

³⁹⁵⁴ P6490,p.1.

³⁹⁵⁵ [REDACTED]. See also M.MIHAILOVIĆ:T.24312.

³⁹⁵⁶ M.MIHAILOVIĆ:T.24313; [REDACTED]

³⁹⁵⁷ P6490,pp.1-2.

1091. **KARADŽIĆ**'s efforts to conceal or destroy these documents reflects his consciousness of guilt, including concerning his involvement in the Srebrenica crimes.³⁹⁵⁸

H. KARADŽIĆ IS RESPONSIBLE FOR THE CRIMES IN COUNTS 2 AND 3 TO 8 AS THEY RELATE TO THE JCE TO ELIMINATE

1. Genocide

(a) The Bosnian Muslims of Srebrenica were subjected to genocidal acts attributable to **KARADŽIĆ**

(i) Killings

1092. Over 7,000 Bosnian Muslim men and boys were killed by Bosnian Serb Forces in Srebrenica and the surrounding area through large-scale executions carried out from 12 July until late July 1995.³⁹⁵⁹ These killings were planned, resourced and carried out with purpose and efficiency.³⁹⁶⁰

(ii) Serious bodily and mental harm

1093. In addition to the mass executions, the Bosnian Muslims of Srebrenica were subjected to acts causing them serious bodily or mental harm, including being congregated in horrid conditions in circumstances so dire that several refugees committed suicide or attempted to do so,³⁹⁶¹ and enduring physical and emotional distress, in some instances to the point of incapacity³⁹⁶² or loss of will to live.³⁹⁶³ Virtually all of the survivors still struggle to achieve long-term recovery.³⁹⁶⁴

³⁹⁵⁸ See *Vasiljević* AJ, Shahabuddeen Dissent, para.24. See also P2989, pp.4,6,10,12-14,16-18; V.D.2: **KARADŽIĆ** was kept informed. **KARADŽIĆ**'s attempts to obstruct the work of the Tribunal are also an aggravating factor in the determination of his sentence. See *Popović* TJ, para.2199.

³⁹⁵⁹ See Srebrenica Narrative, para.173.

³⁹⁶⁰ See V.C: Membership of the JCE to Eliminate; V.F: **KARADŽIĆ** ordered the attack on the Srebrenica enclave; V.G: Formation, Implementation and Cover-Up of the JCE to Eliminate.

³⁹⁶¹ See AF1510; M.MALAGIĆ: T.23533,23536; M.MALAGIĆ: P356, pp.20-21; J.KINGORI: P4140, para.204; J.KINGORI: T.22933; R.FRANKEN: P4175, para.97; R.PATELSKI: P4173, para.24.

³⁹⁶² See e.g. S.MEHMEDOVIĆ: P399, p.4; A.MALAGIĆ: P405, p.3.

³⁹⁶³ See e.g. T.IBRAHIMEFENDIĆ: P4646, pp.13,38. See also KDZ265: P367, pp.18,20,27; H.HAFIZOVIĆ: P396, p.4; R.MALKIĆ: P403, p.3; S.OSMANOVIĆ: P398, pp.3-4.

³⁹⁶⁴ See e.g. T. IBRAHIMEFENDIĆ: P4646, pp.13,20; T. IBRAHIMEFENDIĆ: T.26681-26682,26700.

1094. Killing thousands of the men and uprooting the women, children, and elderly also destroyed the population's traditional familial and community structures³⁹⁶⁵ and has disrupted the formation of new social relationships.³⁹⁶⁶ Some survivors simply cannot imagine the future.³⁹⁶⁷ Many do not wish to, or feel that they cannot, return to their former homes.³⁹⁶⁸

(b) Substantial part of a protected group

1095. It is a fact of common knowledge³⁹⁶⁹ that the Bosnian Muslims constitute a protected group under Article 4 and that the Bosnian Muslims of Srebrenica are a substantial component of that group. These conclusions were settled in the *Krstić* Appeal Judgement and are beyond reasonable dispute.³⁹⁷⁰ They are also borne out by the evidence adduced in this case.

(c) KARADŽIĆ shared the intent to commit genocide

1096. As reflected throughout this part of the Brief, **KARADŽIĆ**, together with other members of the JCE to Eliminate,³⁹⁷¹ shared the intent to destroy the Bosnian Muslims of Srebrenica. That intent manifested itself through **KARADŽIĆ**'s acts, omissions and statements and the systematic, coordinated and targeted manner in which the genocidal acts were carried out.

1097. The crimes were not isolated acts of violence. They were coordinated, enormous in scale, systematic and methodological in their execution and involved members at the highest levels of the RS government. They were also carried out with

³⁹⁶⁵ T.IBRAHIMEFENDIĆ:P4646,pp.53-55; T.IBRAHIMEFENDIĆ:T.26683. *See e.g.* H.DELIĆ:P400,p.2; S.MEHMEDOVIĆ:P399,pp.3-4. *See also* S.OSMANOVIĆ:P398,p.2; KDZ265:P367,pp.5-6; R.MALKIĆ:P403,p.3; M.MEŠANOVIĆ:P393,p.3; S.SALČINOVIĆ:P404,p.3; H.HAFIZOVIĆ:P396,p.3; S.SULJIĆ:P392,p.2; H.SALIHović:P391,pp.2,3; S.IBIŠEVIĆ:P401,p.4.

³⁹⁶⁶ T.IBRAHIMEFENDIĆ:P4646,pp.21,23,55; T.IBRAHIMEFENDIĆ:T:26680,26682-26683,26687. *See e.g.* S.SALČINOVIĆ:P404,p.4.

³⁹⁶⁷ T.IBRAHIMEFENDIĆ:P4646,pp.29-30.

³⁹⁶⁸ T.IBRAHIMEFENDIĆ:P4646,pp.27,29; *See e.g.* S.OSMANOVIĆ:P398,p.4; S.IBIŠEVIĆ:P401,p.4; H.DELIĆ:P400,pp.2-3; H.HAFIZOVIĆ:P396,p.2; S.SULJIĆ:P392,p.2.

³⁹⁶⁹ Facts of common knowledge can be judicially noticed at the judgement stage. *See e.g. Karera* TJ,para.536; *Muvunyi* TJ,para.16. Rule 94(A) also requires trial chamber to take judicial notice of such facts. *D.Milošević* Judicial Notice Appeal,para.21.

³⁹⁷⁰ *Krstić* AJ,paras.15-23.

³⁹⁷¹ The intent of the other JCE members can be inferred from their statements, act and conduct as detailed throughout this Brief. *See e.g.* MLADIĆ's statement that "the time has come to take revenge on the Turks in this region":P4202,p.203.

ethnic animosity.³⁹⁷² The underlying acts of genocide and related acts—including the killings, forcible removals, infliction of serious bodily and mental harm, destruction of mosques, replacement of Muslim administrative structures for Serb—were intended to ensure that the Bosnian Muslim community of Srebrenica could not reconstitute itself.

1098. **KARADŽIĆ**'s endorsement of the genocide plan was both necessary and instrumental to its success. He was in contact with virtually every major figure within the BSL, collecting information, coordinating their actions, and ensuring that a complex genocidal operation was carried out efficiently.³⁹⁷³ **KARADŽIĆ**'s supreme position and his knowledge of the crimes, combined with his actions, demonstrate that he shared the intent with MLADIĆ and others to destroy the Bosnian Muslims in Srebrenica.³⁹⁷⁴

1099. **KARADŽIĆ**'s genocidal intent is also made clear by his statements after the genocide, when his only regret was that not all of the Bosnian Muslim men were killed,³⁹⁷⁵ and in his active efforts to cover-up the forcible removal and murder operations.³⁹⁷⁶

1100. When taken as a whole, and in regards to **KARADŽIĆ**'s supreme position, the evidence establishes beyond reasonable doubt that **KARADŽIĆ** shared the intent to destroy the Bosnian Muslims of Srebrenica.

2. Persecution, murder, extermination, forcible transfer, and deportation

1101. The facts proving **KARADŽIĆ**'s genocidal intent also prove his intent to commit persecution,³⁹⁷⁷ murder as a crime against humanity and as a violation of the laws or customs of war, extermination, forcible transfer, and deportation.³⁹⁷⁸

³⁹⁷² See e.g. Srebrenica Narrative, paras. 76, 101, 109.

³⁹⁷³ See V.B: **KARADŽIĆ** significantly contributed to the common purpose; V.D: Reporting Chain to **KARADŽIĆ**; V.F: **KARADŽIĆ** ordered the attack on the Srebrenica enclave; V.G: Formation, Implementation and Cover-Up of the JCE to Eliminate.

³⁹⁷⁴ See e.g. V.B: **KARADŽIĆ** significantly contributed to the common purpose; V.G.5: **KARADŽIĆ**'s state of knowledge.

³⁹⁷⁵ P1412, p.17.

³⁹⁷⁶ See V.G.3: Continued implementation of the JCE to Eliminate including its cover up; V.G.4: Continued Cover-Up of Srebrenica Crimes.

³⁹⁷⁷ Acts of persecution committed against the Bosnian Muslims of Srebrenica include killings, terrorisation and abuse of Bosnian Muslims of Srebrenica in Potočari, beatings of men and boys prior

VI. HOSTAGE-TAKING JCE

A. Overview

1102. Following NATO airstrikes against Bosnian Serb military targets on 25 and 26 May 1995, Bosnian Serb Forces took more than 200 UN military observers (UNMOs) and peacekeepers hostage. The BSL informed the UN that the hostages would be killed or injured if airstrikes continued. These acts were part of a JCE to compel NATO to abstain from conducting further strikes. **KARADŽIĆ**, with others, intended that the personnel be taken hostage; he ordered subordinates in the VRS and MUP to seize them and use them as human shields.

B. **KARADŽIĆ** shared the JCE's common purpose and the intent for the crime of hostage taking

1103. **KARADŽIĆ** shared the common purpose of taking UN personnel hostage to compel NATO to abstain from conducting air strikes, and shared the intent for the underlying crime of hostage-taking.³⁹⁷⁹ Before the airstrikes, he had warned that UN forces would be "detained"³⁹⁸⁰ if NATO used force against the RS. **KARADŽIĆ** concedes that he decided to seize the hostages,³⁹⁸¹ which he in any event acknowledged at the time.³⁹⁸² He also approved their use as human shields.³⁹⁸³ He said he would consider releasing them only if the Security Council "abolish[ed] the use of force".³⁹⁸⁴

to their execution as cruel or inhumane treatment, forcible transfer or deportation of the women, children and elderly, and imposition and maintenance of restrictive and discriminatory measures, such as unlawful arrests and/or the denial of the right of judicial process.

³⁹⁷⁸ The elements of each of these crimes is referenced in Section III.B.4: Crimes were an essential part of the achievement of the common purpose.

³⁹⁷⁹ The *Blaškić* AJ defines hostage-taking as, "when a person seizes or detains and threatens to kill, injure or continue to detain another person *in order to compel* a third party to do or abstain from doing something as a condition for the release of that person." *Blaškić* AJ, para.639 (emphasis added). See also *Sesay* TJ, para.240; Art.8(2)(c)(iii), International Criminal Court Elements of Crimes, ICC-ASP/1/3(part II-B).

³⁹⁸⁰ P2265, pp.3,6/P2264, p.1 (partial duplicates). See also Notice of Special Defence, para.10; D1055, p.4; J.ZAMETICA:T.42474; D988; D987; D2149, p.57.

³⁹⁸¹ Notice of Special Defence, paras.7,10.

³⁹⁸² P1410, p.329; P5026, p.2. See also D2149, pp.56-57.

³⁹⁸³ P2137, p.2. See also D2149, pp.56-57.

³⁹⁸⁴ P5626, p.2. See also P5607; P2182; D1055, p.5; P6474.

1104. Despite international condemnation,³⁹⁸⁵ **KARADŽIĆ**'s participation continued. On 1 June, he warned that attempts to liberate the hostages by force "would be a slaughter" and only a "political" resolution was possible.³⁹⁸⁶ He issued orders staggering the hostages' release³⁹⁸⁷ to avoid military intervention and maximize the BSL's negotiating leverage.³⁹⁸⁸ After the hostages' release, a reporter asked him if it wasn't a "terrible mistake to have allowed your people to have captured UN soldiers, to—for the world to have seen them chained, to have seen masked men holding guns at their heads." **KARADŽIĆ** then admitted both his involvement, and his intent, explaining "we felt hopeless and helpless, and we had to do something very drastic in order to prevent further attacks and in order to show to the international community that we are cornered and that we, being cornered, are ready to defend ourselves by all means."³⁹⁸⁹

1105. **MLADIĆ** and senior VRS officers³⁹⁹⁰ also shared the common purpose and intent for the crime of taking hostages. **MLADIĆ** threatened the hostages with death in the event of further air strikes,³⁹⁹¹ and later released them on **KARADŽIĆ**'s orders.³⁹⁹² **KRAJIŠNIK** made clear at the time and in his testimony that he, too, shared the common purpose and intent for the crime.³⁹⁹³

C. Implementation

1106. Following increased shelling of civilian areas in Sarajevo and the BSL's refusal to comply with an UNPROFOR demand to return weapons that had been removed from WCP's,³⁹⁹⁴ NATO carried out airstrikes against Bosnian Serb military targets on 25 and 26 May 1995.³⁹⁹⁵ On 25 May **KARADŽIĆ** ordered **MILOVANOVIC** to "arrest everything foreign in RS territory and to treat military

³⁹⁸⁵ See e.g. P2268; P2269,p.2. See also R.SMITH:T.11370-11374; P5014; P2284,p.47.

³⁹⁸⁶ D1056. See also P888,p.2.

³⁹⁸⁷ See VI.C: Implementation.

³⁹⁸⁸ With 15 hostages still held, **KARADŽIĆ** boasted about the success. See P1410,pp.328-333. See also P2182,00:00:42-00:01:08.

³⁹⁸⁹ P5026,p.2.

³⁹⁹⁰ See e.g. P2149; P2137; P2151; P2147.

³⁹⁹¹ P2268,p.4; R.SMITH:T.11372-11374; P2269,pp.3-4. See M.KRAJIŠNIK:T.43341. See also P2273,p.4.

³⁹⁹² See e.g. P2152; P889; P2139; P891; P2183; P893.

³⁹⁹³ See e.g. M.KRAJIŠNIK:T.43340; P2271,p.2; P2272; P5626,p.3; P5610; P1410,p.136; D1055,p.6.

³⁹⁹⁴ R.SMITH:T.11365-11369; P2267.

³⁹⁹⁵ AF2796; R.SMITH:T.11367-11369,11371; P2024; P2184, p.1; D2149,p.56; D1051.

personnel as prisoners of war and hold them as hostages till the end of war.³⁹⁹⁶ By the afternoon of 26 May, Bosnian Serb forces had taken hostage eight UNMOs and placed them at sites of earlier NATO targets.³⁹⁹⁷ MLADIĆ told SMITH these hostages would be killed if there were further airstrikes,³⁹⁹⁸ a threat MLADIĆ's liaison officer also made.³⁹⁹⁹ In the following days, Bosnian Serb Forces took at least 200 UN personnel hostage.⁴⁰⁰⁰ The media broadcast images of the hostages and threats against them.⁴⁰⁰¹ They were held by force or threat of force⁴⁰⁰² and used as human shields.⁴⁰⁰³ Some were assaulted or otherwise mistreated.⁴⁰⁰⁴

1107. The JCE was implemented systematically⁴⁰⁰⁵ and was centrally controlled, as affirmed by UN personnel who were involved and contemporaneous RS documentation.⁴⁰⁰⁶ It was well-organised by the VRS and MUP.⁴⁰⁰⁷ VRS orders relating to the captured personnel were followed.⁴⁰⁰⁸ During and after negotiations,⁴⁰⁰⁹

³⁹⁹⁶ D2149,pp.56-57.

³⁹⁹⁷ P2268,p.4; P5013,p.2; P6474. *See also* P2171,p.2.

³⁹⁹⁸ P2268,p.4; R.SMITH:T.11372-11374.

³⁹⁹⁹ R.SMITH:T.11371-11373,11409-11410. *See also* P.RECHNER:P2170,paras.27-28,31,36,38; P.RECHNER:T.11089; P2268,p.4; P5013,p.2.

⁴⁰⁰⁰ *See* R.SMITH:T.11374; P2173,p.1; P2270,p.1; D1056,p.1. *See e.g.* J.RILEY:P2148,p.5;

M.CORNISH:P52,pp.6-9; A.VISHNEVSKI:P2135,pp.1-3; KDZ196:T.10728-10729;

[REDACTED]; [REDACTED]; P2171.

⁴⁰⁰¹ P2179; P2024,00:00:00-00:01:50; P2180; P2181; P2157; P2174; P2154; P2182; P6474; P2024; P2184,pp.1-3/P2153/P2155(partial duplicates); P2143. *See also* R.SMITH:T.11371-11373. *See e.g.* P.RECHNER:P2170,paras.39-40,42-43,52-53; G.EVANS:P2525,p.8; J.GELISSEN:P56,pp.5-6,8; J.KALBARCZYK:T.10843.

⁴⁰⁰² *See e.g.* G.EVANS:P2525,p.6; H.NIGHTINGALE:P50,p.6; M.CORNISH:P52,pp.7-9. *See also* J.GELISSEN:P56,p.5.

⁴⁰⁰³ *See e.g.* P.RECHNER:P2170,paras.31,41-45,51-53,55-56; P.RECHNER:T.11090-11091,11100-11101,11104; P2171,p.4; P2172,pp.3-4; J.KALBARCZYK:T.10838,10842,10848-10849,10852; P2162; M.HELGER:P2117,pp.2-3; P2145; M.HELGER:T.10752,10759; G.WESTLUND:P49,pp.5-6; G.EVANS:P2525,pp.6-8; J.GELISSEN:P56,pp.6-7; A.VISHNEVSKI:T.10709; P2136; KDZ196:P5907,paras.27-31 ; H.NIGHTINGALE:P50,p.7; P2024,00:00:00-00:01:50; P2184,p.2/P2155(partial duplicates). *See also* P2147; P2146; Y.AKASHI:T.37769-37770.

⁴⁰⁰⁴ P.RECHNER:T.11119-11120; P2172,p.3; G.WESTLUND:P49,p.6; KDZ196:P5907,paras.18,22; [REDACTED]; M.HELGERS:P2117,pp.2-3; A.VISHNEVSKI:P2135,p.3.

⁴⁰⁰⁵ *See* R.SMITH:T.11376; P2150; P2178,pp.3-4.

⁴⁰⁰⁶ R.SMITH:T.11374-11376. *See* J.RILEY:T.10783; P2137; P2150. *See also*

A.VISHNEVSKI:P2135,p.3; P.RECHNER:T.11085-11086.

⁴⁰⁰⁷ *See e.g.* KDZ196:P5907,paras.25-31,35; H.NIGHTINGALE:P50,pp.5-6;

A.VISHNEVSKI:P2135,pp.2-3. *See also* P2178,p.3; P2150,pp.2-6.

⁴⁰⁰⁸ *See* J.RILEY:T.10784-10786; R.SMITH:T.11374-11376. *Compare* P2137; P2147; P2151,pp.1-2; P2109 with P2184,p.2/P2155(partial duplicates); P2024; P2138,p.6; P2171,p.5; P2178,p.2. *See also* A.VISHNEVSKI:P2135,p.3; H.NIGHTINGALE:P50,p.6; P.RECHNER:P2170,paras.51,53; P.RECHNER:T.11100-11103; J.KALBARCZYK:T.10844-10845,10852; G.EVANS:P2525,pp.7-9; J.GELISSEN:P56,pp.5-7.

⁴⁰⁰⁹ *See e.g.* P2273; D1034; P2161,pp.1-2; P1410,pp.329-333; C.KIRUDJA:P3804,paras.149-164.

the hostages were released in stages between 2 and 19 June, in accordance with **KARADŽIĆ**'s and **MLADIĆ**'s orders.⁴⁰¹⁰

D. **KARADŽIĆ significantly contributed to the JCE**

1108. **KARADŽIĆ** was a central participant at every stage of the implementation of the common purpose. As discussed above, **KARADŽIĆ** admitted his involvement in the decision to detain UN personnel,⁴⁰¹¹ publicly warned that attempts to liberate the hostages by force "would be a slaughter" and only a "political" resolution was possible.⁴⁰¹² He ordered the VRS to take foreign military personnel hostage,⁴⁰¹³ approved a VRS order to place hostages at potential targets to prevent air strikes,⁴⁰¹⁴ and controlled the hostages' release, issuing orders releasing them in stages.⁴⁰¹⁵

E. **Reprisals is not a valid defence**

1109. **KARADŽIĆ** concedes that he took the decision to detain the UN personnel,⁴⁰¹⁶ and—by putting forward a reprisals defence—that the act was contrary to IHL.⁴⁰¹⁷ These acts cannot, however, constitute lawful reprisals. Under IHL, detainees may never be subject to reprisals.⁴⁰¹⁸ Therefore, the unlawful act of

⁴⁰¹⁰ **2 June 1995**: P889; P2152; P3873; P3874; P3875; P3876; P3877; P3805; P3806; P3807; J.RILEY:T.10788-10789; **6 June 1995**: P891; P2139; KDZ196:T.10726; **13 June 1995**: P2156; P2159; P2160; P2161; J.KALBARCZYK:T.10863-10865; P2158; **17 June 1995**: P893; P2183; M.HELGERS:T.10761.

⁴⁰¹¹ Indictment, para.14(a),(d),(e). *See* VI.B: **KARADŽIĆ** shared the JCE's common purpose and the intent for the crime of hostage taking.

⁴⁰¹² Indictment, para.14(a),(e). D1056.

⁴⁰¹³ D2149,pp.56-57.

⁴⁰¹⁴ Indictment, para.14(d),(e). *See* VI.B: **KARADŽIĆ** shared the JCE's common purpose and the intent for the crime of hostage taking.

⁴⁰¹⁵ Indictment, para.14(a),(e). As one of the main proponents of and participants in the hostage-taking who openly-acknowledged his participation and sought to justify it (*see e.g.* P2137;P1410,p.329;P5026,p.2) it follows that **KARADŽIĆ** also facilitated and encouraged the crime by failing to prevent, investigate or punish the perpetrators within the meaning of Indictment para.14(h), *See* VI.C: Implementation.

⁴⁰¹⁶ *See* Notice of Special Defence,paras.6, 7, 10.

⁴⁰¹⁷ **KARADŽIĆ** claims that the act was a reprisal—an unlawful act rendered lawful by other elements of the reprisal defence. *See* Notice of Special Defence,para.5. In any event, the Appeals Chamber has held that Common Article 3—which establishes minimum protections for individuals placed *hors de combat* that are applicable under the Geneva Conventions and enshrined in customary international law—prohibits the taking of hostages. Decision on Appeal of Trial Chamber's Decision on Preliminary Motion to Dismiss Count 11 of the Indictment, 9 July 2009, paras.21-27. *See also* T.28735.

⁴⁰¹⁸ Common Article 3 establishes minimum protections for all persons placed *hors de combat* for any cause. The absolute nature of this protection includes prohibition of reprisals. GCIII Commentary,p.40. *See also* GCIV,Art.33; GCIII,Art.13; GCI,Art.14; GCII,Art.16; API,Art.20; ICRC Study,Rule 146,pp.519-523.

threatening detainees so as to obtain a concession from NATO⁴⁰¹⁹ cannot be justified as a reprisal.⁴⁰²⁰

VII. ALTERNATE MODES OF LIABILITY

A. JCE III

1110. For the reasons set forth in Sections III, IV, V, and VI, **Radovan KARADŽIĆ** is responsible for the charged crimes through his participation in the four pleaded joint criminal enterprises. The charged crimes formed part of the common purpose of one or more of those joint criminal enterprises as set out in the Indictment.⁴⁰²¹

1111. In the event the Chamber finds that one or more pleaded crimes do not fall within the common purpose to permanently remove Bosnian Muslims and Bosnian Croats from Serb-claimed territories through the commission of crimes, that common purpose included at least the crimes of forcible transfer and deportation; it was foreseeable that the crimes of genocide (under Count 1), persecution, extermination, and murder might be perpetrated by JCE members or persons used by such members to carry out crimes forming part of the common purpose. **KARADŽIĆ** was aware that such crimes were a possible consequence of the implementation of the common purpose, and willingly took that risk.⁴⁰²²

1112. In the event the Chamber fails to find that **KARADŽIĆ** was a member of a JCE to eliminate the Bosnian Muslims in Srebrenica, then (i) the forcible transfer of women, children and elderly men from the Srebrenica enclave formed part of the common purpose to permanently remove Bosnian Muslims and Bosnian Croats from Serb-claimed territories;⁴⁰²³ and (ii) it was foreseeable that members of the JCE to permanently remove Bosnian Muslims and Bosnian Croats from Serb-claimed territories—or persons used by such members to carry out crimes forming part of the

⁴⁰¹⁹ The "essential element" of hostage-taking is "the use of a threat concerning detainees so as to obtain a concession or gain an advantage." *Blaškić* AJ, para.639.

⁴⁰²⁰ See also Response to Notice of Special Defence, which sets out in detail the reasons **KARADŽIĆ**'s reprisals defence fails.

⁴⁰²¹ See Indictment, paras.9,15,20,25.

⁴⁰²² See Indictment, para.10; JCE III Decision, para.18; *Šainović* AJ, para.1557; *Brdanin* AJ, paras.365, 427-430).

⁴⁰²³ See Indictment, para.75.

permanent removal common purpose—might perpetrate genocide, persecution, extermination and murder against the Bosnian Muslims of Srebrenica. **KARADŽIĆ** was aware that such crimes were a possible consequence of the implementation of the common purpose to permanently remove Bosnian Muslims and Bosnian Croats from Serb-claimed territories, and willingly took that risk.⁴⁰²⁴

B. Superior Responsibility (Article 7(3))

1113. As SDS party leader,⁴⁰²⁵ President of the SNB,⁴⁰²⁶ President of the Presidency,⁴⁰²⁷ Supreme Commander of the VRS⁴⁰²⁸ and the acknowledged leader of the Bosnian Serbs, **KARADŽIĆ** had command and effective control⁴⁰²⁹ over a vast network of subordinates in the Bosnian Serb Forces—including the MUP,⁴⁰³⁰ the TO,⁴⁰³¹ the VRS⁴⁰³² and Bosnian Serb paramilitaries⁴⁰³³—and the Bosnian Serb Political and Governmental Organs, including municipality-level Serb Crisis Staffs.⁴⁰³⁴

1114. During the Indictment period, **KARADŽIĆ** knew or had reason to know⁴⁰³⁵ that his subordinates were about to commit or had committed crimes charged in the Indictment. He nevertheless failed to take the necessary and reasonable measures to prevent the commission of these crimes and/or to punish his subordinates who perpetrated them.⁴⁰³⁶

C. Planning (Article 7(1))

1115. **Radovan KARADŽIĆ** designed, or approved the designs of others, the crimes charged in the Indictment.⁴⁰³⁷ These acts substantially contributed to these

⁴⁰²⁴ See Indictment, paras.10,43,59,64.

⁴⁰²⁵ See SDS Section.

⁴⁰²⁶ See SNB.

⁴⁰²⁷ See Presidency Section.

⁴⁰²⁸ See VRS Section

⁴⁰²⁹ *Čelebići* AJ, para.256; *Halilović* AJ, para.59.

⁴⁰³⁰ See MUP Section.

⁴⁰³¹ See TO Section.

⁴⁰³² See VRS Section.

⁴⁰³³ See Paramilitaries Section.

⁴⁰³⁴ See Government and Crisis Staff sections.

⁴⁰³⁵ See *Čelebići* AJ, paras.232,239; *Hadžihasanović* AJ, para.27; *Orić* AJ, para.51.

⁴⁰³⁶ See *Blaškić* AJ, para.417 citing *Čelebići* TJ, para.395. See also *Orić* AJ, para.18.

⁴⁰³⁷ *D.Milošević* AJ, para.268; *Kordić* AJ, para.26.

crimes.⁴⁰³⁸ **Radovan KARADŽIĆ** intended that these crimes be committed, or acted with an awareness of the substantial likelihood that a crime would be committed in the execution of the acts or omissions planned.⁴⁰³⁹

D. Instigating (Article 7(1))

1116. Through his acts and omissions, **Radovan KARADŽIĆ** prompted others to commit the crimes charged in the Indictment.⁴⁰⁴⁰ These acts or omissions substantially contributed to the conduct of others in committing the crimes.⁴⁰⁴¹ **Radovan KARADŽIĆ** intended that these crimes be committed, or acted with an awareness of the substantial likelihood a crime would be committed in the execution of the acts or omissions instigated.⁴⁰⁴²

E. Ordering (Article 7(1))

1117. **Radovan KARADŽIĆ**, acting from his position of *de jure* and *de facto* authority within the RS, instructed others to commit the crimes charged in the Indictment.⁴⁰⁴³ These acts had a direct and substantial effect on the commission of the crimes.⁴⁰⁴⁴ **Radovan KARADŽIĆ** intended that these crimes be committed, or acted with an awareness of the substantial likelihood a crime would be committed in the execution of the acts or omissions instigated.⁴⁰⁴⁵

F. Aiding and abetting (Article 7(1))

1118. Through his acts⁴⁰⁴⁶—and his omissions while under a legal duty and ability to act⁴⁰⁴⁷—**Radovan KARADŽIĆ** provided practical assistance, encouragement or moral support that had a substantial effect on the perpetration of the crimes charged in the Indictment.⁴⁰⁴⁸ He acted with the awareness of the probability that a one of a

⁴⁰³⁸ *D. Milošević* AJ, para.268; *Kordić* AJ, para. 26.

⁴⁰³⁹ *D. Milošević* AJ, para.268; *Kordić* AJ, paras.29,31.

⁴⁰⁴⁰ *Kordić* AJ, para.27.

⁴⁰⁴¹ *Kordić* AJ, para.27.

⁴⁰⁴² *Kordić* AJ, paras.29,32.

⁴⁰⁴³ *D. Milošević* AJ, para.290; *Kordić* AJ, para.28.

⁴⁰⁴⁴ *Kamuhanda* AJ, para.75; *Kayishema* AJ, para.186; *Gacumbitsi* AJ, paras.184-185.

⁴⁰⁴⁵ *Blaškić* AJ, para.166. *See also Blaškić* AJ, paras.42,166.

⁴⁰⁴⁶ *See Šainović* AJ, para.1649 ("specific direction" is not an element of aiding and abetting liability under customary international law).

⁴⁰⁴⁷ *Mrkšić* AJ, para.134; *Orić* AJ, para.43.

⁴⁰⁴⁸ *Šainović* AJ, para.1649; *Blaškić* AJ, para.46.

number of crimes would be committed and that his acts or omissions would probably assist the commission of these crimes.⁴⁰⁴⁹

VIII. SENTENCING

1119. **Radovan KARADŽIĆ** was far and away the most powerful individual in the RS. He commanded a vast array of state forces and organs, which he had played a key role in establishing,⁴⁰⁵⁰ and deployed them as tools of violence and destruction. State authorities such as the police, army and municipal governments, authorities that ordinary people would normally turn to for protection, became—for Muslims and Croats in Serb-claimed territory, the civilian population of Sarajevo, and the UN hostages—forces of terror.

1120. **KARADŽIĆ** had more ability than any other individual in the RS to direct the course of his subordinates' violent campaigns and indeed stop them. He did the opposite. He provided strategic supervision and issued specific directives that furthered these violent campaigns, rewarded perpetrators, lied to internationals and covered up crimes. When NATO intervention interfered with these campaigns, he directed his subordinates to take UN personnel hostage and treat them as human shields. Along the way, he periodically issued sham orders and instructions which complemented false public claims that he was interested in protecting the very people he was targeting. This is abuse of authority on a massive and sustained basis—abuse of authority writ large.⁴⁰⁵¹

1121. Under his command and oversight, **KARADŽIĆ**'s subordinates and those cooperating with them expelled, killed, tortured and otherwise mistreated hundreds of thousands of Muslims and Croats; they bombarded Sarajevo with shells and bullets, killing, maiming and terrorising its civilian population for over three and a half years. The scale and scope of these criminal campaigns is vast.⁴⁰⁵² **KARADŽIĆ** played a

⁴⁰⁴⁹ *Simić* AJ, para.86. See also *Mrkšić* AJ, paras.49,63; *Blaškić* AJ, paras.45,50; *Ndindabahizi* AJ, para.122; *Furundžija* TJ, para.246; *Blaškić* TJ, para.287; *Brdanin* TJ, para.272; *Strugar* TJ, para.350. In the jurisprudence "probable" is synonymous with "likely". See *Martić* TJ, para.79,fn.150.

⁴⁰⁵⁰ **KARADŽIĆ**'s senior position(s) is a factor relevant to assessing the gravity of the offence pursuant to Article 24(2) of the Statute. See *Strugar* AJ,para.353.

⁴⁰⁵¹ Abuse of authority may be considered as an aggravating factor pursuant to Article 24(2) and Rule 101(B(i)). See *D.Milošević* AJ,paras.302-303.

⁴⁰⁵² The scale and scope of the crimes pertains to a number of factors relevant to assessing the gravity of the offence under Article 24(2) including: the scale of the crimes (see *Galić* AJ,para.450; *Mrkšić* AJ,para.413; *Krajišnik* AJ,para.779); the nature of the offences (see *Mrkšić* AJ,para.400); their

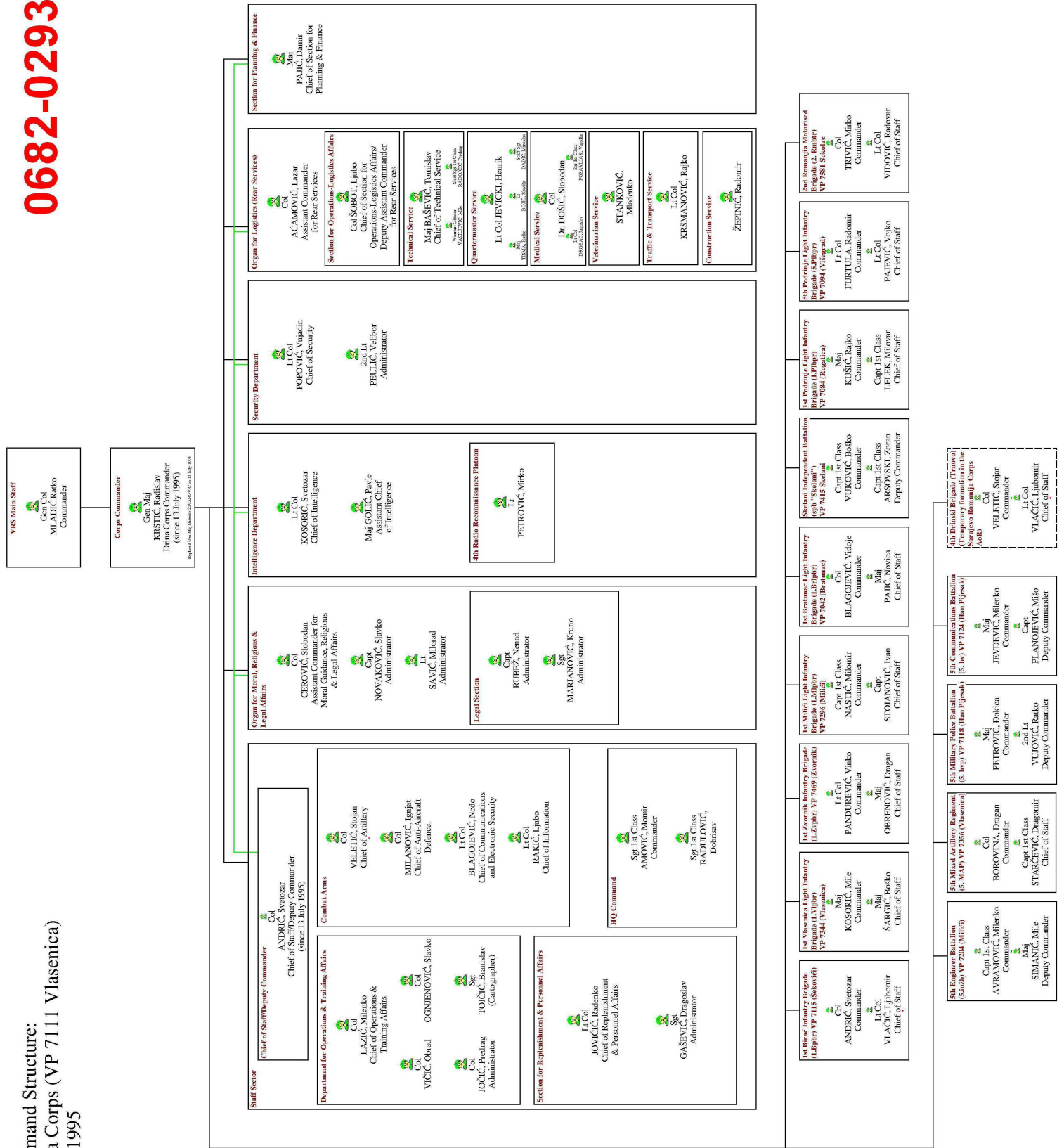
key role throughout each of them. The persistence with which **KARADŽIĆ** pursued his goal of a "clean" Drina in the face of immense international pressure, culminating in arguably the biggest single crime in Europe since WWII, is indicative of the "form and degree"⁴⁰⁵³ of his participation.

1122. In light of the vast scope of criminality encompassed by each one of the three main components of this case, and **KARADŽIĆ**'s uniquely powerful position, should the Chamber find **KARADŽIĆ** responsible for a substantial portion of the crimes encompassed by any of these three components under any mode of liability, life imprisonment is the only appropriate sentence.

systematic pattern and continuous repetition (*see Galić* AJ,para.450); the number of victims and the effect of the crimes upon them (*see Galić* AJ,paras.410,450).

⁴⁰⁵³ When assessing the gravity of the offence, the inherent gravity of the crime and the criminal conduct of the convicted person must be considered in the light of the particular circumstances of the case and the form and degree of participation of the convicted person. *Čelebići* AJ,para.731. For example, extensive contributions to a JCE warrant a severe sentence. *See Krajišnik* AJ,para.739. *See also Čelebići* AJ,para.739.

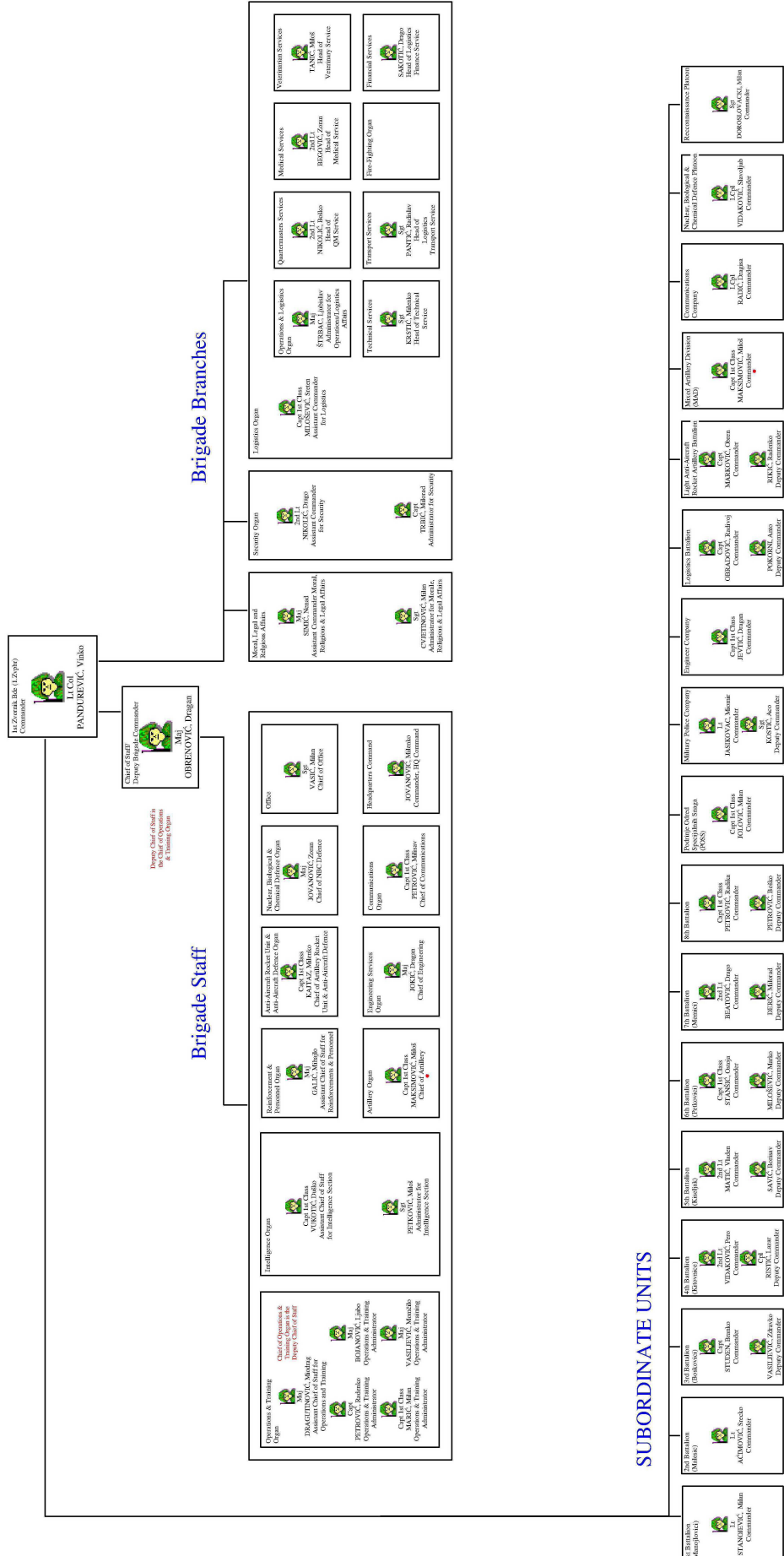
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APPENDIX E





1st ZVORNIK INFANTRY BRIGADE STRUCTURE

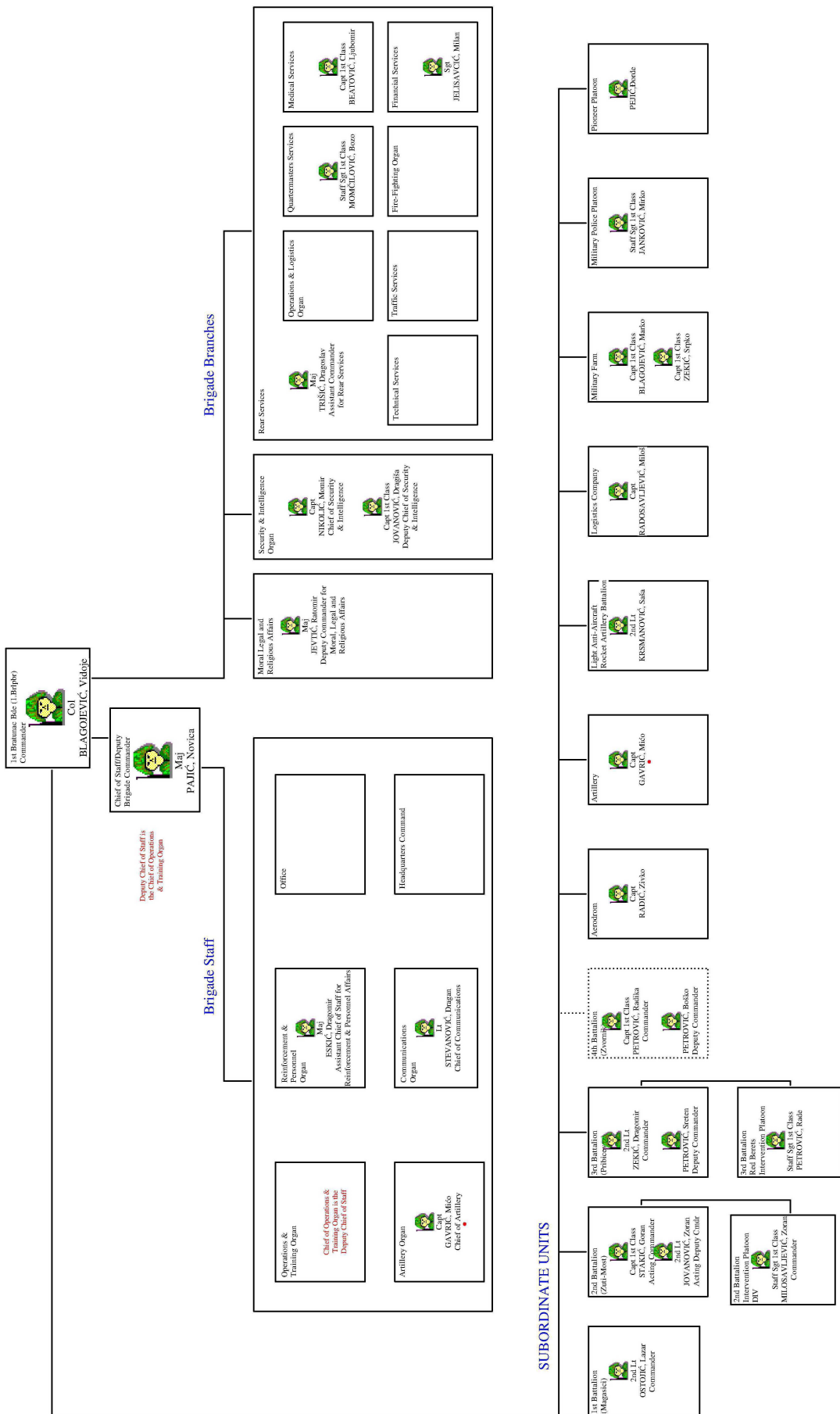
July 1995



1st BRATUNAC LIGHT INFANTRY BRIGADE STRUCTURE

July 1995

KEY
 Dual Function
 1st Adj. Lt. Bratunac (1st Battalion)
 (H) Battalion, 1st Zvornik (1st Temporary Assignment) (1st Adj. Lt. Bratunac (1st Battalion))



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Prosecution's Final Trial Brief - Appendix XX

Overarching JCE / General

Dragomir ANDAN	
Claim contradicted by own statement	
Claim	Contradiction
MUP positions were staffed according to party affiliation and not professionalism by all sides. However, the Serb side did that only on the local level, not for senior positions. Did not know that changes on the senior level were based on the agreement of the political parties:T.40844-40846.	Confronted with his contradictory prior testimony(D3774,pp.34,44), ANDAN confirmed his earlier evidence:T.40846.
Had no knowledge about Rajko DUKIĆ at the time, nor his involvement in the erection of barricades in Sarajevo:T.40853-40854.	Confronted with his prior testimony/statement(D3774,pp.50-52;P6434,p.5), ANDAN confirmed the role of DUKIĆ in the events in Sarajevo and his various positions in the SDS and Serb CS:T.40854-40855.
Propaganda and problems that witness and Milorad DAVIDOVIĆ had in Bijeljina, including ANDAN's removal, were caused by Ljubisa SAVIĆ (MAUZER) not by government officials:T.40864-40865.	Confronted with a report on paramilitary formations(P2855,p.5), ANDAN confirmed that MAUZER was close to the authorities. Confronted with excerpts from his prior interviews(P6434,p.3), confirmed that he had stated in his previous interview that the BSL (KARADŽIĆ and KRAJIŠNIK) wanted him to be removed but was evasive about what he meant:T.40882-40885.

Slobodan AVLIJAŠ	
Claim contradicted by own statement	
Claim	Contradiction
"The food at KP Dom Kula was prepared in one cauldron both for employees and the inmates":D3105,para.17.	Confronted with earlier testimony, agreed he was not in a position to know and "I couldn't know that":T.35184.
People feared him because he was honest and told them that "someone will be held accountable" for detention facilities:T.35138.	When asked why he did not make an effort to determine whether people who begged him for help were being held illegally and should be immediately released, witness pleaded, "I was just a simple man" who was "left without any work in 1992" so "I was not in any position" to "tell anyone to do anything":T.35181-35182.
The central government had no information about camps	Confronted with KOVAČ letter to president and prime minister that civilians

<p>(“events that took place the length and breadth of Republika Srpska”) until his visit:D3015,para.57.</p>	<p>were being held in violation of international law(P1100) and MANDIĆ’s claim that the letter was hypocritical because KOVAČ was aware and such information was received on a daily basis, claimed that he was not privy to regular information about prisoners because this wasn’t part of his work or “daily dealings”:T.35171.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim Central authorities had no communication with Foča until December 1992:D3105,paras.33,35,60.</p>	<p>Contradiction Confronted with information the republic leadership received about Foča well before December 1992, claimed “I really don’t know” whether information was submitted:T.35150. Confronted with a May 1992 request by ĐERIĆ for a member of the Foča CS to come to Pale, claimed, “I had nothing to do with the government.”:T.35150-35151. Confronted with D415 dated 3-Jun-1992 reflecting the government’s receipt of a report from Foča, claimed “I don’t know who could have been there.”:T.35154. Finally, confronted with his <i>Stanišić-Župljanin</i> testimony referring to the visit by members of a working group in which he participated to Foča, and a report to the government confirming that visit, witness admitted, “That’s correct [...] they went to Foča by way of Niksić”:T.35154-35155.</p>
<p>P1090,p.4 makes clear that the Exchange Commission was never in the service of ethnic cleansing because “it can be seen” that all persons, including adult male civilians, had to be allowed unhindered and safe relocation per their wishes:D3105,para.44.</p>	<p>To the contrary, P1090,p.3 addresses the issue of persons whose detention is not related to the war or war activities and directs that only women, children, the old and helpless should be released. In addition, witness omitted reference to the provision that “freedom of movement” was contingent on not “jeopardising general safety”:P1090,p.3;D3105,para.44.</p>

<p>Savo BOJANOVIĆ</p>	
<p>Claim contradicted by own statement</p>	<p>Contradiction</p>
<p>Claim Detainees in Batković were POWs, and witness didn’t know whether and how civilians had been brought there:T.34855.</p>	<p>Previously stated detainees whom BOJANOVIĆ visited at the camp were civilians:T.34853.</p>
<p>Other credibility/reliability issue Responsible for releasing a number of Serbs who had committed serious crimes against Muslims, following which their trials never took place:<i>Cyjetković and Jurošević</i> case:D1481;D1482;D1483;D3078;T.34834-34835.</p>	

Considered it appropriate that MIHAJLOVIĆ, a self-confessed murderer of a Muslim detainee, be granted pre-trial release:T.34838,34866;D1479;P6179.

Was only Military Judge for limited period: left Military Court in September 1993:T.34863.

Momir BULATOVIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>Expulsions took place on all sides but were not a result of policy of the respective leaderships:D3051,para.20:T.34540-34542.</p>	<p>Confronted with excerpts from SDC minutes 12-Mar-1993(P6161,p.32), BULATOVIĆ confirmed the accuracy of the minutes and that RS Prime Minister LUKIĆ had advised him to ethnically cleanse Sandžak and kill the Muslims there:T.34543-34547,34549, Confronted with Death of Yugoslavia interview(P6160,p.25), BULATOVIĆ confirmed his observations while travelling to Pale through Serb-controlled area that if a village was empty and destroyed it must have been a Muslim village:T.34556-34557. Confronted with Council for Coordination of state policy minutes dated 18-Aug-1992(D3054,pp.19,75), BULATOVIĆ confirmed to have received information from the UN that 15,000 Muslims had been cleansed from Sanski Most and heard from General PANIĆ that when Serb forces came across a Muslim village they would kill everybody. However, BULATOVIĆ claimed not to know whether the information was accurate:T.34557-34561.</p>
<p>Shelling of civilian areas in Sarajevo was not ordered or part of a policy but done by untrained local soldiers protecting their own homes; KARADŽIĆ and MLADIĆ were not in control of the guns; shelling was going on without logic and plan:D3051,paras.24-26,31:T.34525-34527.</p> <p>Was proud that Montenegro received 72,000 refugees from BiH including Muslims and that Montenegro treated them equally:T.34540-34541,34570.</p>	<p>KARADŽIĆ told BULATOVIĆ that according to MLADIĆ shelling of Sarajevo was necessary to avoid Serb positions being overrun by the ABiH, and that VRS could only defend themselves by shelling:D3051,para.23.</p> <p>Admitted that some of the Muslim refugees were deported to BiH and ended up in the Foča KP Dom, a “tragic incident”, “these people suffered tragic fate”:T.34571-34572.</p>

Kosta ČAVOŠKI

Kosta ČAVOŠKI	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>Was not in contact with KARADŽIĆ during his years in</p>	<p>Received “a number of letters” from KARADŽIĆ; knows that he frequently</p>

hiding; it was impossible to establish contact with him:T.37122.	wrote letters during his time of hiding:T.37125-37126. KARADŽIĆ 's letter to TOHOLJ states he has written to Kosta, actively coordinating with him on publication of RK materials, has received material from him:P6291,pp.2-3.
Other credibility/reliability issue	
Chaired the Committee on Establishing the Truth about Radovan KARADŽIĆ ; editor and publisher of six volumes of KARADŽIĆ 's works while he was in hiding:T.37065-37066.	
Called KARADŽIĆ "the herald of Serbian freedom, the creator of the [RS], the chivalrous knight who will not surrender":T.37114;P6289.	
Claimed the ICTY "was working badly and in no way did it guarantee... "a fair trial", so an honourable and an honest trial and that it was trying to sabotage the whole proceedings to the detriment of Doctor Radovan KARADŽIĆ "; "I think that, from the very start, this trial was a true judicial scandal and it can only end that way":P6290.	

Savo ČEKLIĆ	
Claim contradicted by other reliable evidence	
Claim	Contradiction
The SDS was not a centralist party; party boards at all levels made decisions at their various levels:D3854,para.4.	Confronted with passages from minutes of 11-Mar-1992 meeting of SDS Main Board, Executive Board and Political Council regarding ensuring implementation of republic level SDS policies in the field and insisting on "a stronger centralised policy"(D1277), ČEKLIĆ provided a long, non-responsive answer:T.41219-41222.
It is "not correct" that the BSL claimed areas of BiH where Serbs were a minority:T.41227.	Confronted with claim that RS territory includes "areas in which the Serbian people is now a minority due to the genocide carried out against it in World War II," contained in the proclamation of the Republic of the Serbian people of BiH, ČEKLIĆ denied the plain words of the document:T.41228-41229;P6444.
Other credibility/reliability issue	
As of July 1991, ČEKLIĆ was no longer a member of SDS Main or Executive Boards and between 9-May-1992 and November 1993 he lived in Serbia:T.41219,41222, undermining the reliability of his claims regarding the conduct/intentions of the Accused/BSL during the Indictment period:T.41218-41219,41222.	

José CUTILEIRO	
Claim contradicted by own statement	
Claim	Contradiction
Asked whether it was correct, as he wrote in 1992, that the	Confronted with his own article stating this(D2980), conceded writing

<p>Bosnian Serbs “went brutally on the offensive” in the aftermath of 18 March, he stated, “I didn’t write anywhere that anybody had gone brutally on anything”:T.33950.</p>	<p>it:T.33953-33954.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>KARADŽIĆ wrote CUTILEIRO in June 1992 that he was firmly committed to the principles of the agreement of 18 March:D2968,para.29.</p>	<p>Contradiction</p> <p>Confronted with KARADŽIĆ’s statements that the agreement on principles “was the moment when Bosnia collapsed”/“exploded”(P1394.p.82) and “at that moment, Bosnia was finished for the MZ /International Community/. That was a great achievement.”(P1388.p.86) CUTILEIRO stated that he was not aware of these statements(T.33957), but acknowledged that the destruction of Bosnia was not part of the agreement in principle:T.33958.</p> <p>When confronted with KRAJIŠNIK’s assertion that the negotiations provided an opportunity to preserve the Serb people in Bosnia and “have it become part of the Serbian empire”(D88.p.64), acknowledged that the agreement in principle did not envision the Bosnian Serb entity becoming part of the Serbian empire—“On the contrary”:T.33960-33961.</p>
<p>The Dayton Agreement map was “about the same” as the map annexed to the Statement of Principles of 18-Mar-1992:D2968,para.33.</p>	<p>Confronted with a map reflecting the difference between the Dayton map and the map affixed to the Agreement on Principles, particularly that many formerly majority Muslim municipalities fell within the Bosnian Serb province under Dayton(P6135), agreed that this was “probably” the result of the conflict:T.33969-33970. Asked whether he was aware that KARADŽIĆ had been dissatisfied with many aspects of the map attached to the Statement of Principles, including Eastern Bosnia(T.33964-33965) said he did not recall:T.33966. Further confronted with KARADŽIĆ’s emphasis that Bosnian Serbs would insist on the factual situation in negotiations(e.g. P2554.p.78;P1479.p.22;P1403.p.157), stated that KARADŽIĆ had not indicated to him that he would be insisting on the de facto situation:T.33976. Witness was also not aware of KARADŽIĆ’s statement at the 53rd Assembly in 1995 that there were municipalities where the Serbs had been the minority but which they had to have for “strategic reasons” and now no one is practically questioning it anymore:T.33970.</p>

Milorad DODIK	
Claim contradicted by own statement	
Claim	
Did not hear about promotion of forcible displacement:T.36842-36843.	<p>Contradiction</p> <p>Confronted with Serbian press report that he accused the SDS of “organizing and committing crimes during the war” and it was to be expected that “all leading SDS officials at various levels stand before the Hague tribunal”(P6278), witness minimised it as “the political struggle between me and the SDS [...] which need not necessarily be based on facts”:T.36903-36904.</p>

Ronald HATCHETT	
Claim contradicted by own statement	
Claim	
During meetings with KARADŽIĆ , never heard KARADŽIĆ express the view that the RS should be ethnically pure; an interview with KARADŽIĆ was tendered through witness in which KARADŽIĆ claimed ethnic cleansing was not Serb policy and only a “regrettable consequence” of the war:D2741,paras.12-13.	<p>Contradiction</p> <p>Asked whether KARADŽIĆ mentioned that he had insisted that Eastern Bosnia be Serbian, said, “He wanted that territory to be part of Republika Srpska [...] And it would have involved trading territories which would imply movement of populations”:T.31951.</p> <p>Confronted with the likelihood that he had not asked KARADŽIĆ, specifically what the forces under his control had been doing in specific municipalities, witness confirmed and added that “it was obvious” to anyone who was following what was going on at this time “that ethnic cleansing had been taking place on the part of all parties”:T.31941-31942.</p>

Vladislav JOVANOVIĆ	
Claim contradicted by own statement	
Claim	
RS and RSK were not recognised by Serbia but not contested either:D3015,para.25.	<p>Contradiction</p> <p>Agreed while testifying in <i>Milošević</i> that Serbia’s supportive relationship toward RS was greater than that and that Serbia supported the Bosnian Serbs “politically, financially, and diplomatically, yes. They were our people”:T.34289. Further claimed that he couldn’t speak to the level of military support because “I knew nothing about military matters”:T.34290.</p> <p>Confronted with his comments to KARADŽIĆ and the BSL at the Council for</p>
Never heard during his discussions with KARADŽIĆ	

<p>anything about establishing ethnically pure Serbian territories:D3015,para.50.</p>	<p>Coordination/Harmonisation(P794,p.2) that “the territory that we get, nationally homogeneous as soon as possible” and observing that if freedom of movement would bring the “mixing of populations to our detriment, then what has been gained would be lost,” witness said “of course both objectives would have to be achieved by peaceful means...and most definitely not by crimes”:T.34318-34320. But confirmed his <i>Milošević</i> testimony (asked whether KARADŽIĆ in making this comment “was describing massive ethnic movements to achieve Serb domination of an area,” witness said, “That is the position that Mr. KARADŽIĆ was presenting and I have nothing to do with that”):T.34323.</p>
<p>As far as Sarajevo was concerned, KARADŽIĆ told him that there was not a policy of shelling and targeting the city and “if” such incidents occurred, they were “sporadic” and caused by “a few frustrated individuals”:D3015,para.52.</p>	<p>Confronted with his <i>Milošević</i> testimony that: (i) “from the very beginning at all levels, we, the Presidency of SFRY, the government of the republic, you (<i>Milošević</i>) personally and I in numerous statements condemned the shelling and demanded that the parts of Republika Srpska cease that activity”; (ii) “The shelling of Sarajevo was something that was constantly condemned by our government”; (iii) “we were constantly opposed to the shelling”; (iv) “let me stress once again that we always condemned the siege of Sarajevo,” witness agreed that it was correct but said “That’s the explanation I received” from KARADŽIĆ:T.34325-34326.</p>

Dragan KAPETINA

Dragan KAPETINA	
<p>Claim contradicted by own statement</p> <p>Claim</p> <p>Variant A/B(P960) was elaborated by the SDS “in a professional and lawful manner” in accordance with the obligation of each political party to prepare a contingency plan for situations which might threaten peace:T.41269.</p>	<p>Contradiction</p> <p>Unresponsive when asked to identify legal and constitutional provisions which allowed a political party to unilaterally create Serb municipality organs including separate police station and police forces; rhetorically asked whether it was constitutional and lawful for representatives of a constituent people to be outvoted:T.41291-41293.</p>
<p>Claim contradicted by other reliable evidence</p> <p>Claim</p> <p>KAPETINA came to RS President’s office between 5 and 10-Jul-1995. KARADŽIĆ was very angry, asking KAPETINA whether he had any information from the Main Staff or DK as he was unable to establish communication with them; who the</p>	<p>Contradiction</p> <p>Confronted with KARADŽIĆ’s statement at T.982(opening address) that he himself ordered entry into Srebrenica, KAPETINA nevertheless stood by his written evidence:T.41305-41308.</p>

<p>idiots were who ordered Srebrenica; and that he had said not to take any offensive actions towards the safe areas. KAPETINA's limited response so infuriated KARADŽIĆ that he kicked and knocked over furniture and pulled out his hair:D3856,paras.41-43;T.41298-41302.</p>	<p>When shown communication and contact between KARADŽIĆ, the GŠ and DK during period KAPETINA purported to meet with KARADŽIĆ(D2097, D2080, P2276), and KARADŽIĆ's statement(T.27725), KAPETINA said "maybe" KARADŽIĆ invited him on 4 or 5 July, before he had this information:T.41310-41312.</p> <p>Conceded that KARADŽIĆ was not literally pulling his hair out, but in making gestures sometimes put his fingers through his hair:T.41300-41301.</p> <p>Shown a 13-Jul-1993 photo of KARADŽIĆ in his office filled with heavy furniture(P4560,p.1) and asked to identify which pieces KARADŽIĆ kicked and knocked over, KAPETINA said they did not meet there but in KRAJIŠNIK's office and that KARADŽIĆ knocked the chair over inadvertently:T.41300-41304.</p>
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Nenad KEČMANOVIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>The BSL never wanted to create a state of their own but rather wanted to create a confederate or federal unit based on territorial and ethnic concentration of the population (even after Apr 1992):T.39107-39109.</p>	<p>Confronted with excerpts from his own expert report prepared for the <i>Kvočka</i> case(P6351,pp.3,4),stating that Muslims, Croats and Serbs aspired to create their own ethnic space and establish their own nation states, admitted that the report seems to contradict what he said in court, then embarked on an unrelated historical overview of events in 1918 and 1941:T.39109-39112.</p>
<p>Believed it was possible to transform BiH territorially and ethnically without any radical or forced changes to the ethnic structure on the ground; the leopard skin metaphor is largely a construct:D3645,para.56;T.39112.</p>	<p>Confronted with excerpts from his <i>Kvočka</i> expert report(P6351,p.21), stating that the problem was the territorial and ethnic structure of BiH resembling a leopard's skin: combining unconnected ethnically homogeneous enclaves could not be done without massive movement of peoples, and as neither Muslims, Serbs nor Croats were prepared to leave their homes, civil war was inevitable. Witness confirmed his report and that people were moved from Banja Luka, Foča, Eastern Bosnia but did not want to call it ethnic cleansing because ethnic cleansing took place on all sides:T.39112-39115.</p>
<p>Not a single Serb was on the list of military commanders appointed to the ABiH:D3645,para.30.</p>	<p>Admitted that DIVJAK, a Serb, was one of the top three men in the ABiH:T.39092.</p>

Other credibility/reliability issue

In the context of RS Assembly session of 24 and 26-Jul-1992(D92,p.86) and KARADŽIĆ's reference to the Muslims' birth rate quadrupling and that we cannot live together, Kecmanović claimed not to know of KARADŽIĆ's statement but in fact shares that view; gave the example of Lebanon as a prosperous country falling apart because demographic changes favoured the Muslims and the Muslims then demanded more powers:T.39126.

Čedomir KLJAJIĆ**Claim contradicted by own statement****Claim**

Between 1979 and September 1992, KLJAJIĆ worked as a full-time police official with the Bosnian MUP or RS MUP, with the exception of one five-month period:D3917, para.2;T.42184-42185.

Contradiction

[REDACTED]

RS MUP insisted that all victims and perpetrators were treated equally and that "any crime of which we learned must be investigated":T.42232.

When asked to name a single individual who was investigated and prosecuted for rounding up Muslims and detaining them in camps in poor conditions (see discussion of D447 below), avoided answering the question before finally conceding that he could not do so, while claiming the question was unfair:T.42238-42240.

Claim contradicted by other reliable evidence**Claim**

Did not believe he ever said that helicopters were flying back and forth every day between Vrace/Pale and Belgrade in mid-April 1992:T.42203.

Contradiction

When shown an 18-Apr-92 intercept in which he stated helicopters were flying back and forth "daily" and "operating constantly"(P2227,p.2), stated that there was "just one or perhaps two" helicopters transporting the wounded:T.42203-42204.

RS MUP had many problems including poor communications:D3917, para.12.

Although he was the #3 person in the RS MUP at the time, was unaware that by 20-Apr-92 the RS MUP was producing daily bulletins based on information received regularly from the CSBs:T.42204.

Other credibility/reliability issue

When shown a 16-Apr-92 conversation between himself and JEŠURIĆ, Bijeljina CSB Chief(DI694), did not think there was “anything out of the ordinary” in JEŠURIĆ’s report that 15,000 Muslims had escaped from Zvornik:T.42208-42209. Further claimed he did not have to ask JEŠURIĆ about the circumstances of their departure because he had heard on the radio and seen on TV that there was combat there, then claimed he had no power to save these people anyway:T.42208-42210. Later when asked what means of intervention he had in such circumstances, claimed that due to poor communications, he was unable to issue orders to SJBs, a claim directly contradicted by his telephone conversation with JEŠURIĆ:T.42230-42231.

Trifko KOMAD	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>KOLJEVIĆ met with TUDMAN in January 1992 in an effort to avoid bloodshed and war; TUDMAN did not agree to a division without war:D3198,para.24.</p>	<p>Confronted with the transcript of the meeting revealing that KOLJEVIĆ appealed to the common interest of Serbs and Croats for no independent Bosnia(P986,p.6), for “separation”(P986,p.5), “the homogeneity of certain areas”(P986,p.13), territorial delimitation and population exchanges(P986,p.25) and “exchanges”(P986,p.32;T.36342-36343), responded “of course I was not fully informed”:T.36344.</p>
<p>Knew nothing about Variant A/B, other than that a group of retired JNA officers were “probably” working on it:D3198,para.23.</p>	<p>Confronted with ČIZMOVIĆ’s explicit call at the BSA for the Instructions to be carried out,(P1349,p.13;T.36319), claimed that he “probably” did not attend that session(T.36319), although he had previously claimed that he attended “most” BSA sessions:D3198,para.22.</p>
<p>Local leaderships were “rather autonomous” in their work:D3198,para.20.</p>	<p>Confronted with the Deputies’ Club transcript, at which KARADŽIĆ mentioned Variant A/B four times and stated “that is why we called you today, to intensify, to introduce the ‘second level’”(P12,pp.5,7,17,24,26) continued to claim that he was not aware of Variant A/B:T.36320.</p> <p>Confronted with KARADŽIĆ’s removal of local officials who threatened to replace “my man Bozo Vučurević”, observed that the problem was solved not only in Trebinje but “in other places also”:T.36325.</p>
	<p>Confronted with his own telephone conversation with a local official who called the republic level and said “of course, that’s why I’m asking you because nothing can be done without your approval”(P6248,p.2), acknowledged that this was the type of conversation he had with local officials concerning the</p>

implementation of regionalisation:T.36344-36345.

Dušan KOVAČEVIĆ

Claim contradicted by own statement

Claim

During ambush at Dobrovoljačka street during 2nd MD evacuation a group yelled they had orders from GANIĆ and DIVJAK to kill them all:D3671,paras.9-15.

Contradiction

Confirmed his *Perišić* testimony stating that during this incident he saw DIVJAK giving orders to cease fire, adding:“In the statement I signed, the last which was drafted by Radovan Karadžić’s Defence team, my previous statements were not reflected in totality having to do with Dobrovoljačka Street”:T.39641-39642.

Vladimir LUKIĆ called the witness to Pale; told him on arrival he was going to propose witness as defence minister:D3671, para.18.

Admitted that once Lukić said he would nominate the witness as defence minister, they went together to see **KARADŽIĆ**, who said the Main Staff supported his nomination:T.39654.

Operations were planned without the knowledge of the members of the Supreme Command and were exclusively with the jurisdiction of the Main Staff of the VRS:D3671,para.27.

Confirmed his *Perišić* testimony that in principle, while military operations were planned outside the knowledge of members of the Supreme Command and government, and lay solely within the competence of the Main Staff, they were planned with the knowledge and approval of the President of the Republic, adding that the President could occasionally directly authorise the Main Staff to carry out urgent operations:T.39657-39660.

400 people were intentionally killed at Srebrenica; the greatest number were killed in the breakthrough, and a number were executed in retaliation for crimes committed against the Serbs in 1992-1993; witness has never received contrary or different information:T.39673-39674,39676-39677.

Acknowledged following some Tribunal witnesses and Srebrenica judgments, yet stated “it is up to this Tribunal to establish the exact figures and correct information as part of the proceedings, and that should be authoritative for me and for others too”:T.39679-39680.

Other credibility/reliability issue

Witness claimed no knowledge that on 12-Jul-1995 the VRS ordered MoD to mobilise buses across nine municipalities to move civilians from Srebrenica, asserted he was not involved:T.39681. However, when asked about same mobilisation of buses, Defence Ministry Secretary Dragan KAPETINA testified it was KOVAČEVIĆ who was in charge of mobilisation and staffing:T.41316-41317.

Dušan KOZIĆ

Claim contradicted by other reliable evidence

Claim

KOZIĆ did not use inflammatory language in BSA:T.36982.

Contradiction

At the 16th BSA session, 12-May-1992, KOZIĆ stated: “The enemy, Ustashes

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	and Mujahedin must be defeated by whatever means are necessary and only after that can we negotiate”:P956,p.28;T.36983-36984.
KOZIĆ uncovered weapons smuggling in Bileća municipality on 26-May-1991:D3364,para.12;D3374,p.1.	Confronted with a MUP report showing KOZIĆ took active part in this arms smuggling, having been found in a truck containing rifles and ammunition, KOZIĆ contradicted himself, first denying knowledge of what was in the truck, then accepting that he accompanied the truck of weapons:T.36987-36991.
The work of the government was independent of KARADŽIĆ :D3364,para.17.	Confronted with KARADŽIĆ 's statements on his control of the government (“Believe me, the government is mine. I am responsible for its functioning”(P1379,p.255); “We must control the executive power on a daily basis. We have to keep an eye on it daily”(P6287)), denied that these were true:T.36999-37000.
There was a lack of cooperation between the civilian and military sectors:D3364,paras.26-27.	Confronted with KARADŽIĆ 's statement to the BSA—attended by KOZIĆ—that KARADŽIĆ “examined, approved and signed seven directives”, “as the Supreme Commander I stood behind the plan for Žepa and Srebrenica”, and “personally supervised the plan”(P1415,p.84,86), KOZIĆ stated that he could not remember it:T.37011-37013.

Momčilo KRAJIŠNIK

Momčilo KRAJIŠNIK	
Claim contradicted by other reliable evidence	<i>Contradiction</i>
Claim Attended “few meetings” that General MLADIĆ had with the leadership(T.43756); there were “two or three briefings”(T.43755); meetings were “few and far between”:T.43812.	MLADIĆ's 1992 diary(P1478) reveals over 30 meetings with MLADIĆ and KRAJIŠNIK in 1992 alone.
What was discussed at meetings with MLADIĆ was simply what they “saw on TV as well”(T.43812); didn't know specific tasks assigned the army or what goals they were pursuing(T.43757); apart from possible random information, not informed of military actions before or after they happened(T.43755,43759-43761); knew nothing about directives:T.43816,43816-43817.	Confronted with BSL-MLADIĆ meeting the day before Directive One, at which “demands” by KARADŽIĆ (T.43800) include “očistite” Butmir, Hrasnica, Dobrinja, and Sokolović Kolonija(P1478,p.93), which was reflected almost verbatim in Directive One the next day, witness said it “is only natural that a directive would follow after certain talks”(T.43801) but was “not obligatory for the military”:T.43803. Confronted with 4-Aug-1992 BSL-MLADIĆ meeting at which Directive 3 was “accepted without objections”(P1479,p.24), said “I don't remember that it was presented like this and that someone mentioned the directive”:T.43818.

<p>Didn't know whether the army carried out objectives put to it by the political leadership(T.43762) and didn't know whether the strategic objectives of the war served as guidelines and were translated into operational formations:T.43763. Strategic goals were political goals(T.43302) not military tasks for the army(T.43301), and the army didn't work towards accomplishing the strategic objectives:T.43791. There was "not much planning in advance. It would just happen that you would lose a territory or gain a territory":T.43765.</p>	<p>Confronted with his statements at 8-Nov-1992 BSL meeting with Main Staff members and corps commanders that "we have a disproportionate engagement of the army in relation to the strategic objectives [...] We have not achieved: The Neretva, the sea and the Podrinje. We have achieved: the corridor and separation with the Muslims [...] The most important objective is the task assigned to Zivanović—the mopping up of the Drina"(P1481,pp.146-147), witness claimed he was reminding the army of the need to end the war as soon as possible by "conceding territory but not by taking the territory of others":T.43834.</p>
<p>Didn't meet with MLADIC before the 16th session and didn't speak to him about goals:P6516,pp.17-19.</p>	<p>Confronted with meetings in the week preceding the 16th session at which the Strategic Objectives were laid-out to MLADIC on two consecutive days by KARADŽIĆ and the witness, witness said that MLADIC was not yet commander and talks "could have been held with anyone":T.43794.</p>
<p>BSL never asked the army to conquer majority Muslim and Croat territories:T.43305.</p>	<p>Confronted with his 8-Nov-1992 comments to MLADIC that one of the two most pressing tasks was <i>očistite</i> Orašje(P1481,p.147), witness acknowledged it was a predominantly Croat municipality:T.43839. Confronted with his statement to Judge Orić in his own case that his public comment on video that Orašje had not yet been liberated was not a "correct statement" and they "didn't have a right" to Orašje(T.43840-43841), claimed that the video reflected him showing that "Orašje should belong to the Croats" and he "never entertained an opinion" that the Serbian army should take hold of the area:T.43842. When reminded by Judge Kwon that his comments indicated that Orašje should be liberated, the witness stated that "maybe it was not put in a correct way":T.43842-43844. Further confronted with MILOŠEVIĆ telling MLADIC that the witness and KARADŽIĆ in 1995 were still urging that "they should seize Orašje"(P1473,pp.130-131), witness stated that he was not "ruling out" that by 1995 "this was something that we discussed":T.43848-43849.</p>
<p>BSL did not ask MLADIC to enhance the factual situation through military operations:T.43783.</p>	<p>Confronted with 22-Jul-1992 MLADIC order stating that the VRS liberated territories "we consider ours" and "created conditions for political and military leadership of the [RS] so that they could perform all activities and negotiations from the position of the stronger one in this territory"(D593), stated "nobody told them explicitly what to do":T.43808. Confronted with BSL-MLADIC meeting immediately preceding the issuance of Directive 3 at which KARADŽIĆ explicitly noted that no military concessions should be made</p>

	<p>because “the European community will accept the factual state of affairs,”(P1479,pp.16-23), witness said “these were not orders, they were wishes”:T.43816.</p>
<p>MLADIĆ “never received a request from us to ethnically cleanse the Drina.”:T.43825.</p>	<p>Confronted with his assertions at 8-Nov-1992 meeting that “the most important objective is the task assigned to ŽIVANOVIĆ – the mopping up of the Drina,”(P1481,p.147), witness said he was “just trying to channel things and say what the political objective was, and the objective was not to cleanse the Drina”:T.43835.</p>
<p>There could not have been a policy to cleanse because they took on commitments that everyone could return to their homes: See e.g. T.43376,43779.</p>	<p>Confronted with his speech in Srinje (formerly Foča) that:“Today you are not as you were before. Now I see a true Serbian town, and you proudly bear your true Serbian name. You are the example to every Serb because all that was coming from this town you’ve managed to eliminate,”(P6204), and asked whether he was preparing the people of Foča for the return of the Muslim population after the war, said that “of course today I would speak differently”:T.43854.</p>
<p>Didn’t know that Variant A/B had been distributed(T.43201), didn’t receive the document, would have ignored it if he had because it was unimportant and unnecessary, never heard that anyone had implemented it:T.43854-43855. There was no SDS directive to set up CS:T.43877.</p>	<p>Confronted, <i>inter alia</i>, with</p> <p>(a) 21-Dec-1991 intercept in which he and KARADŽIĆ discuss “who will implement what we issued last night,” with KARADŽIĆ indicating ČIZMOVIĆ(P2550),</p> <p>(b) ČIZMOVIĆ stating to BSA that “tasks set out in the instructions of 19-Dec-1991 should be carried out”(P1349,p12);</p> <p>(c)-Jan-1992 report forwarded to the witness’s personal attention on Ilidža’s establishment of a Serbian municipal assembly “in accordance” with the Instructions(P975), and</p> <p>(d) comments of Jajce representative to the witness at an Assembly session regarding his response to Variant A/B the instructions and his discussion with KRAJŠNIK and KARADŽIĆ about implementation difficulties(P1377,p148), witness said it may have been discussed in his presence but since it was irrelevant “why does it matter”(T.43873) and “The A and B Variant is not relevant” because it was “not something that was adopted by the Assembly”:T.43883.</p>
<p>The taking of hostages was a “desperate” attempt “by the army.”:T.43340.</p>	<p>Confronted with intercepts in which:</p> <p>(a) KARADŽIĆ agreed that hostages should be kept until final solution stating “That’s our decision, that’s out of the question, there is no release”(P5607),</p>

(b) witness assured interlocutor that “we let some go and we captured some others...we’re doing that [holding on to hostages]. We have an excellent method. We always have an ace up our sleeve”(P2271), and
 (c) witness stated “we are not crazy to release them [...] we need those people. Believe me, we are very pleased, very pleased, because there are many things we have achieved”(P6520),
 witness stated that he was “not sure now” the initiative and whole implementation was carried out by the army(T.43887) and “the hostages were our trump card, if I can put it that way, and that’s what it says here, in order to avert the danger of bombing our positions. The intention was not to kill people, but to prevent terrible things that were happening in our area then”:T.43897-43898.

Vladimir LUKIĆ

Claim contradicted by own statement

Claim

First read the strategic goals at the end of 1993 or beginning of 1994:T.38817-38818. Was present at the 34th Assembly in late 1993 at which **KARADŽIĆ** discussed the strategic goals at length; recalled some of the things said in that regard:T.38818-38819.

Contradiction

Confronted with his Mar 2006 ICJ testimony where he claimed to be unaware of the strategic goals until two or three months before giving testimony, now claimed he “made a mistake” in testifying that he first read the strategic goals in late 1993 or the beginning of 1994:T.38821-38823. Asked whether he wanted to change his earlier testimony that he was familiar with **KARADŽIĆ**’s 1993 Assembly speech on the strategic goals he stated he was familiar with it “in general terms” but it was impossible to retain everything heard at the session:T.38823. In re-direct, LUKIĆ changed his position again, stating it was difficult to pinpoint the time when he first heard of the strategic goals but it was perhaps sometime when he became prime minister or somewhat later, and told **KARADŽIĆ** that “I remember your presentation most of all” but that “I don’t remember the details of that presentation, of that speech, that you gave”:T.38824.

The exchange of “civilian prisoners” dealt with suspected criminals, exchanged in order to save Serb civilians who had been imprisoned by the other side:D3563,para.33.

Shown **TOLMIR**’s 3-Oct-1994 order stating that “in the exchanges we receive captured soldiers of the Republika Srpska while we mostly give them civilians”(P2684), LUKIĆ responded, “often in war one does not choose. One does what one has to do. [...] And I have to say that others, Muslims, et cetera, when we did not have firm, solid evidence of major crimes, we would exchange

	them; or to put it more precisely, release them thereby”:T.38813.
Claim contradicted by other reliable evidence	
Claim	
<p>Did not remember any shells falling on civilian facilities in Sarajevo; claimed that Serb artillery targeted military targets “as a rule”:T.38755-38756.</p> <p>He “never had problems with Dr. Karadžić with regard to my independence or the independence of the Government.”:D3563,para.27. When asked what the SDS response was to the government’s decision to set up a personnel commission which included one member of the SDS Main Board(P3129, Item 45), witness stated “nothing special happened that I could highlight today”:T.38759.</p> <p>LUKIĆ insisted that all illegally-acquired property be returned to its owners regardless of ethnicity:D3563, para.19. When put to him that his government’s concern about stolen property was about collecting it and using it to fund the state, responded, “God forbid [...] I could never espouse a principle which would take someone’s property away from him”:T.38768.</p>	<p>Contradiction</p> <p>Shown an UNPROFOR damage assessment of the Sarajevo state hospital dated 31-Dec-1992 describing extensive damage to the hospital from tank, anti-aircraft, artillery, heavy machine gun and rocket fire, refused to accept that “so many shells [...] landed on the hospital”:T.38756-38758.</p> <p>Confronted with a letter to him from the SDS Executive Committee criticizing his attempts at “taking unauthorized authorizations on all levels of conducting the policy”, reminding LUKIĆ of his task to “implement the policy of [the SDS] party”, and stating “no appointments will be possible without our approval”(P6337), LUKIĆ stated that this letter jogged his memory on this difference of opinion between the government and certain members of the SDS Executive Committee:T.38760-38761.</p> <p>Confronted with the 20-Mar-1993 government session(P3129) concluding that material assets and money seized from war profiteers and money earned in unlawful and illegal ways is to be placed under the control of the state and used for the defence of the republic (pp.3-4), LUKIĆ persisted in denying his government was collecting unlawfully obtained property and using it to fund the defence of the Republic:T.38770-38772.</p> <p>Confronted with minutes of the 82nd government session (P3141), attended by KARADŽIĆ, concluding that “all goods treated as war booty and which was obtained illegally, which is presently in the possession of the Ministry of the Interior, shall be given to the republican commodity reserves”, LUKIĆ initially denied that these minutes reflected government efforts to collect for its own benefit unlawfully acquired property, only to state moments later, “Why would it constitute a mistake that the government should make sure that the unlawfully acquired property is given over for the purposes of the general good?”:T.38771-38772.</p>
Goran MAČAR	
Claim contradicted by other reliable evidence	

<p>Claim</p> <p>Municipal authorities, “not the Ministry” paid the SJB police:D3663,para.20.</p> <p>The RS MUP paid particular attention to the investigation of war crimes; there was no bias with regard to the ethnic background of the perpetrator or the victim:D3663,para.27. Denied a focus on documenting crimes against the Serbian people(T.39485) and that this focus continued throughout the conflict:T.39489.</p>	<p>Contradiction</p> <p>Confronted with documents evidencing authorisation of payment of SJB police salaries and approval and payment by CSBs and RS MUP accounts (P6380,P6381,P6382,P6383), admitted the documents showed MUP paying police salaries:T.39477-39478,39481-39483.</p> <p>Confronted with a MUP report from his own department, stating that all SJBs were told to emphasise the documentation of war crimes against the Serbian population(P3302,pp.6-7) and a dispatch from Banja Luka CSB(P6384), MAČAR denied the plain words of the documents:T.39485-39486.</p> <p>Confronted with evidence that STANIŠIĆ ordered MAČAR’s service to make a list of all Serbian women raped by Muslim extremists, and Biljana PLAVŠIĆ. requested details on the compilation of this list, MAČAR acknowledged such activity by the BSL:T.39487-39488.</p> <p>Confronted with his November 1995 dispatch to Zvornik CJB: in view of the current events pertaining to the intense activity before the ICTY and the attempts to tarnish the reputation of the RS leadership, it is necessary to intensify activities in connection with preparing and filing criminal reports against perpetrators of war crimes against the Serbian people(P6385), MAČAR claimed this dispatch had to do with “gathering information on the plight of Serbs in the Drina region where the Srebrenica formations killed over 2,000 Serbs”:T.39488-39489. Questioned why the document didn’t say investigate war crimes against all ethnicities, MAČAR claimed that he did not draft the document, persisted that the reason for the dispatch was a propaganda broadcast:T.39490.</p>
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Milan MARTIĆ

<p>Claim contradicted by own statement</p> <p>Claim</p> <p>There was no “parallel structure” in the Krajina involving Jovica STANIŠIĆ and Frenki SIMATOVIĆ that reported to Slobodan MILOŠEVIĆ:D3528,paras.42-43.</p>	<p>Contradiction</p> <p>Agreed when confronted that Radoslav KOSTIĆ and Ilija KOJIĆ were Assistant Ministers in the RSK MUP, and were also members of the State Security Service of Serbia(T.38129-38130;P6311), that their superior was Jovica STANIŠIĆ and that STANIŠIĆ’s superior was Slobodan</p>
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MILOŠEVIĆ:T.38130.	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Witness did not report directly or indirectly to S.MILOŠEVIĆ:D3528,para.43.	Confronted with a telegram to MARTIĆ from General Momčilo PERIŠIĆ to urgently facilitate passage of UNPROFOR “[o]n the order of the President of the Republic of Serbia, Mr. Slobodan MILOŠEVIĆ”(P6312), stated that he did not consider this to be an order:T.38134-38135. Confronted with a report from General ČELEKTIĆ to MILOŠEVIĆ and PERIŠIĆ on the same day specifically referencing the earlier telegram and explaining that “we inform you that we carried out your order”(P6313), claimed the term “order” was used as an “expression of [...] respect for President MILOŠEVIĆ”:T.38136.
Contrary to BABIĆ’s evidence, the JNA never engaged in offensive operations in Croatia, serving instead as a buffer between Croatian and Serb positions:D3528,para.16.	When confronted with his own videotaped words that MLADIĆ came in June or July 1991 to “create self-confidence to serbs, and openly stated that the serbs were right. Until that moment JNA and it’s officers were a buffer zone between us and Croations” [sic](P6318,emphasis added), claimed it was a “distortion” of his words to suggest that the situation changed when MLADIĆ took command but then acknowledged that the clashes in Kijevo happened quite near to this time and “that” was when the JNA “practically got involved in the conflict”:T.38155.
Miladin NEDIĆ	
Claim contradicted by own statement	
Claim	Contradiction
Was in favour of reaching an agreement and negotiating with the Muslim/Croat side during the war; denied ever thinking or saying that Serbs should not negotiate with Muslims:T.45862-45866,45874-45875.	Contradicted by his contemporaneous Assembly speeches and own testimony: 25 th Assembly: noting that the Assembly had adopted the position that the Muslims were a religious sect, witness stated, “[N]egotiations can only be conducted with a people, and I am not in favour of negotiations with religious sects”:D115,p.26. Confronted with this speech, he initially contradicted himself, claiming that he did negotiate with religious sects, then asserted that the Muslims “did not want negotiations. They wanted their own sovereign Bosnia where I would have to tolerate the Sharia law”:T.45876-45877.

	<p>34th Assembly: stated that he would hang himself if Ozren were given to the Muslims in a negotiated agreement:P1379,p.103. Did not recall speech, but agreed “it would have been only normal for me to have said it”:T.45878.</p> <p>Testified that he never recognized the borders of BiH and “I still do not recognize the state borders that we have now”:T.45879.</p>
Other credibility/reliability issue	
Obvious pro-Accused bias: greeted Accused with, “Good afternoon, Mr. President. You are our president for all times, forever”:T.45858. “If anybody deserves the Nobel prize for peace and humanity, it is Dr. Radovan Karadžić”:T.45879.	
Extreme anti-Muslim views: “Nobody wanted to see an Islamic state in the Balkans. Who? Who could have wanted that?”(T.45864-45865); agreed that Serbs faced extermination in a state governed by Muslims(T.45868); claimed, “I have lived for 500 years under the Sharia law”(T.45877); lives in great fear of the Muslim people”:T.45882.	

Velibor OSTOJIĆ

Claim contradicted by own statement	
Claim	Contradiction
Did not meet with MLADIĆ in Herzegovina before 12-May-1992:D2361,p.60.	Denied his own 12-May-92 Assembly statement that he travelled with MLADIĆ in Herzegovina the day before:D2362,para.41;D2361,pp.56-57.
RS media was independent and not under SDS influence:D2362,para.31.	Confronted with his own words contradicting this, claimed not to remember them:D2361,p.122.
Claim contradicted by other reliable evidence	
Claim	Contradiction
“The Council of Ministers was not established and did not function as a body”:D2362,para.3.	Confronted with minutes of 2 nd meeting of Council of Ministers, including his own contributions(D2361,p.34), claimed did not recall any Council activities:D2361,p.35. While admitting that “the minutes challenge” his own statement(D2361,p.36), repeatedly claimed no recollection of this(D2361,pp.36-39).
Denied knowing anything about Variant A/B:D2362,para.39.	Confronted with version of Variant A/B printed in Slobodna Bosna, would not even confirm that the article was about A/B:D2361,p.41. Acknowledged received Slobodna Bosna, but claimed did not read it because it was not credible:D2361,pp.43-44.
Was in village remote from Foča from 25-Mar-1992 to approximately 20-Apr-1992:D2362,para.36;D2361,pp.125-	Confronted with evidence showing his presence in Foča during that period including his reports from Foča on 8 and 14 April(D3319;P3338), [REDACTED]

127.	
Other credibility/reliability issue	
Denied having given interviews published in Reuters(D2361,pp.163-164) and Kozarski Vjesnik(D2361,p.77).	
Frequently relied on lack of recollection when confronted:e.g.D2361,pp.35,36,39,46,56,61,62,67,70,112,123(D2361,p.35). On occasion combined poor memory with denial e.g.D2361,p.69;“I don’t remember, and I simply haven’t been there”D2361,p.77.	
Consistently evasive, e.g. on judge’s questions on formation of municipal territories(D2361,pp.49-53), on who exactly constituted BSL:D2361,pp.53-55. So evasive all three judges reprimanded him: “Outside the question that I didn’t ask but that you almost answered”(D2361,p.94);“I would highly appreciate it if you do not change my question while giving an answer”(D2361,p.135. <i>See also</i> p.76).	
Challenged by Judge Hanoteau on his failure to answer a question, OSTOJIC said, “I’m having some sort of stage-fright”:D2361,p.81. Trying to backtrack on his testimony because of what he called “an incautious comment”(on a topic relevant to KRAJISNIK’s defence), Judge Orie said “No. What you said is part of your evidence. I do understand that you say it’s incautious”:D2361,p.156.	

Stevo PAŠALIĆ	
Claim contradicted by own statement	
Claim	Contradiction
Speculated that population movement in Bosnia during conflict may have been due to “professional reasons” or to reunite families, and criticized TABEAU for not investigating reasons for population movement:T:35362;D3125,paras.66-67.	Admitted that his own research had focused exclusively on the reasons for the movement of the Serb population(T.35394-35398), and that nowhere in his report(D3125) did he share his methodology, the extent of his research, or a sample of any questionnaires he may have used:T35395-35396.
All of TABEAU’s data in municipalities TABEAU report (P4994,p.29,AnnexA1) was erroneous in determining number of individuals born before 1980, using example of Bijeljina:D3125,paras.85-86;D3125.p.32,Table1M;T.35426-35427.	Confronted with error in his own methodology for performing the same calculation in his report(D3125,para.93) with respect to Prijedor, made the absurd claim that it was “skipped while in the printing”, which is impossible in light of the accompanying calculations:T.35429-T.35431.
Challenged the mathematical validity of TABEAU’s “capture-recapture” formula:P4997;P4998;P5002.	Witness conceded that mathematically the formula “might be seen as valid” but that he disputed its application in this case:T.35447. Upon questioning, his main source of contention was that the source data had not been published:T.35449.
Criticized TABEAU Sarajevo reports(P4997;P4998;P5002), for “loosely” studying causes of death, claimed that there were increases in other causes of death	Admitted he did not have any data to support this, saying it “would not be appropriate for an expert”:T.35373-35374.
Claim contradicted by other reliable evidence	
Claim	Contradiction

<p>TABEAU report(P4994,p.30,AnnexA1,Table1) presented calculations “performed only for the Serbs and the Muslims” and not for Croats and “Others”:D3125,para.41.</p> <p>TABEAU Srebrenica report(P4995) ignored evidence that an alleged Srebrenica victim might be alive after the conflict and registering to vote in another part of the country:D3125,p.110;T.35451-35452.</p> <p>Criticized TABEAU municipalities report(P4994) for relying on 1991 BiH census results published in 1995 in Croatia, Witness said “it is unusual and even absurd that a serious study should be based on census results of one country that were published in another, maybe even more biased country!”:D3125,para.57.</p>	<p>Confronted with fact that this table included Table 1C(P4994,p.33) presenting calculations for Croats and Table 1O(P4994,p.36) presenting calculations for “Others”, witness gave vague, non-responsive answers:T.35411-35413.</p> <p>Witness used quote from report(P4995,p.73) out of context; when viewed in its entirety, it shows that such cases were flagged for detailed review using census data to ensure that matching was done correctly:T.35453-35456.</p>
<p>Criticized TABEAU municipalities report(P4994) for relying on 1991 BiH census results published in 1995 in Croatia, Witness said “it is unusual and even absurd that a serious study should be based on census results of one country that were published in another, maybe even more biased country!”:D3125,para.57.</p>	<p>Shown that census figures published in Croatia(P6199) were identical to the figures published earlier in BiH(P6200) and asked how bias could be a factor when the numbers are identical, admitted “we did not challenge the difference in the figures” and claimed that his “main objection” was that publishing another country’s census data was “strange”:T.35439-35442.</p>
Other credibility/reliability issue	
<p>Claimed TABEAU municipalities report(P4994) drew conclusions that population movement was due to “unnatural trends” and described those conclusions as “very bold” and “biased””:T.35369. When asked by the Chamber to identify where TABEAU drew such conclusions, Witness was unable to answer but said it was “based on what Dr. Karadzic said”:T.35371-35372.</p> <p>Said that when people abandon their property to flee to safety, “This is what I called voluntary migration”:T.35402-35406.</p> <p>Was repeatedly unable to demonstrate his methodology and sources for various claims he made against TABEAU’s calculations, claiming he used e.g. “a selection of various variables”(D3125,para.11&n.19); “a certain statistical formula,” which he did not describe, “I had to use my own standards to calculate that”(T.35415); numbers from a “scientific book” the witness authored(D3125,para.115,n.20); stated “it is unnecessary to burden the report with calculations and mathematical statistical formulae”(T.35422); that “this is a very complex problem” and “we used our own calculations,” :T.35449-35451.</p>	<p>Claimed TABEAU municipalities report(P4994) drew conclusions that population movement was due to “unnatural trends” and described those conclusions as “very bold” and “biased””:T.35369. When asked by the Chamber to identify where TABEAU drew such conclusions, Witness was unable to answer but said it was “based on what Dr. Karadzic said”:T.35371-35372.</p> <p>Said that when people abandon their property to flee to safety, “This is what I called voluntary migration”:T.35402-35406.</p> <p>Was repeatedly unable to demonstrate his methodology and sources for various claims he made against TABEAU’s calculations, claiming he used e.g. “a selection of various variables”(D3125,para.11&n.19); “a certain statistical formula,” which he did not describe, “I had to use my own standards to calculate that”(T.35415); numbers from a “scientific book” the witness authored(D3125,para.115,n.20); stated “it is unnecessary to burden the report with calculations and mathematical statistical formulae”(T.35422); that “this is a very complex problem” and “we used our own calculations,” :T.35449-35451.</p>
Dobrislav PLANOJEVIĆ	
Claim contradicted by own statement	
<p>Claim</p> <p>There was a communication breakdown; there were no written documents and no way to know whether dispatches and reports from CSBs and SJBs were received and by whom:D3197,para.20.</p>	<p>Contradiction</p> <p>Confronted with evidence that the CSBs were reporting to the MUP(P2760), admitted this was correct:T.36271.</p> <p>Confronted with evidence that the MUP had multiple means to communicate with subordinate organs, including telephones, facsimile machines, short-wave and ultra short-wave radios and teleprinters, and couriers(P2743,pp.20-21,26),</p>

	<p>witness admitted that when communications were down and there was something urgent to dispatch, that couriers would be employed:T.36272.</p> <p>When confronted with an inspection report from Vogošća and Ilijaš SJBs(P6241), witness admitted that he had probably received this report because he sent a man into the area:T.36274-36275.</p>
<p>Claim contradicted by other reliable evidence</p> <p>Claim</p> <p>The priority was to document all crimes:T.36258; denied that the government's priority was to investigate war crimes against Serbs:T.36258.</p>	<p>Contradiction</p> <p>Confronted with STANIŠIĆ's order of 16-May-1992 to CSBs on "investigation with the entire team in all cases of crimes against the Serbs"(P2715), claimed he did not recall that order(T.36258-36259), even though he was chief of crime prevention and detection until mid-July 1992:D3197,para.2.</p> <p>Confronted with STANIŠIĆ's 26-May-1992 request for information on serious crimes committed against Serbs in territories controlled by the "MUP of the former SRBiH"(P6240), admitted there was an emphasis to document crimes committed against Serbs, claiming this was because "we had been receiving numerous reports from the ground regarding crimes committed against Serbs, particularly in Podrinje" then immediately contradicting himself by asserting "we had no communications at all":T.36262-36263.</p>

Tomislav PUHALAC	
<p>Claim contradicted by other reliable evidence</p> <p>Claim</p> <p>Provided detailed evidence about arming of Muslim "paramilitary and parastate organisations" and "SDA extremists and criminals" via Croatia and the Islamic countries and through the intervention of named individuals:D3104,paras.7,11;D3121. Insisted he knew nothing about Serb police involvement in arming Serb civilians in Sarajevo area:T.35103-35104.</p>	<p>Contradiction</p> <p>Confronted with contemporaneous records showing involvement of Tihomir GLAVAŠ, Tomo KOVAČ and Momčilo MANDIĆ in arming Serbs around Sarajevo, PUHALAC conceded he knew GLAVAŠ(T.35104), and knew KOVAČ(T.35106) and MANDIĆ(T.35108) well. In spite of this, and his thirteen years service, before, during and after the war, in the BiH then RS State Security Services(D3104,para.2;T.35093), insisted he was unaware of any such arming activities by Serb police officials:T.35105-35106,T.35108.</p>
<p>Other credibility/reliability issue</p>	

The witness removed his family from Sarajevo on 1-Apr-1992(D3104,para.12). Anything in his statement about events in the city after that date were things he had no personal experience of, but had heard either from ethnic Serbs who had left Sarajevo, or the news media:T.35101-35102.

Radovan RADINOVIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>Directives had no executive power; they only laid down general guide-lines:T.41392,41500.</p> <p>The Supreme Commander doesn't issue oral orders:T.41455.</p> <p>KARADŽIĆ's command authority as Supreme Commander was limited by appointing MLADIĆ as "commander" of the GŠ rather than "chief". The doctrine of singleness of command was disrupted and a dualism of command established which resulted in conflict and disobedience to the civilian head of the state:T.41379-41381,41484-41485;D3864,paras.80-81,99-101.</p> <p>Calculated 2,200(2,000 in D3864,para.289) legitimate military targets in Sarajevo city:T.41410,41421,41507-41508.</p> <p>The departure of the population was voluntary based on the wish of the Srebrenica civilian authorities and the UN's initiative:T.41434-41435.</p>	<p>Identified "directives" as "command documents" used to "assign[] [...] tasks to subordinates":D3864,para.64. Referred to tasks within directives to be carried out:T.41395.</p> <p>Confronted with P4484 containing oral orders, merely claimed that KARADŽIĆ did not order a new employment of forces:T.41519-41520. Similarly conceded possibility of oral order, became evasive or speculated:T.41431,41539-41546.</p> <p>Provided or confirmed details of KARADŽIĆ's command responsibility as Supreme Commander on the strategic and operational level. Also confirmed the VRS operated under the principle of singleness of command and gave examples of KARADŽIĆ's orders to various command levels:D3864,paras.86-88,95-97:T.41381,41397,41410,41431,41448-41451,41487-41499;D325,pp.7,69,152-155;P1388,pp.85-86;T.41502-41504,41517-41518;P2603.p.24;T.41534,41541-41547,41550-41551,41577,41608,41611-41613.</p> <p>Apart from his calculations being based on the unsupported assertion of 80-120 military targets per brigade(D3864,para.289) admitted that based on similar calculations arrived at the figure of 1,500 military targets in <i>Galici</i>(T.41509), and 1,800 in his book:P6449,p.13;T.41509-41510. Agreed he identified only 222 military targets(P6449,pp.18-30) based on military documents(T.41510-41511) and these related to different time periods and included temporary positions and mobile targets:T.41511-41512.</p> <p>Confronted with his report (D3864,para.360), admitted that conditions were terrible and the population believed that there were no conditions for them to live there; conceded he could not decide whether the departure was voluntary or not:T.41552-41554. [REDACTED] continued to claim the Muslim population could have stayed, but conceded it was outside his expertise to</p>

<p>The separation of the military-aged men in Potočari was part of a legitimate screening process to check their identity:D3864,para.377.</p> <p>The transfer of prisoners from Bratunac to Zvornik was a legitimate military security action:D3864,para.413.</p>	<p>establish legitimacy of the departure:T.41555-41557.</p> <p>Challenged with the fact that stripping the men of their identity cards would not help the identification, claimed this was a temporary measure done to prevent them from fleeing:T.41558-41560. Confronted with his <i>Krstić</i> testimony that it was criminal and unjustifiable to strip the men of their identification, insisted it was necessary to take the documents:T.41560.</p> <p>Confronted with his <i>Krstić</i> testimony (stating that the transfer was completely to military doctrine(T.41562); and that it was inconceivable that prisoners were taken to Zvornik at a time of intense fighting there(T.41566), claimed his earlier testimony was focused on the length of detention and that sending the prisoners to Zvornik was based on proper VRS orders:T.41562-41563; but conceded, however, that the prisoners should have been transferred to Batković:T.41564.</p>
Claim contradicted by other reliable evidence	
Claim	
<p>Civilians and civilian objects in Sarajevo were not deliberately targeted:T.41504-41505;D3864,para.285.</p>	<p>Contradiction</p> <p>When confronted with Scheduled Incident G5 evidence, conceded that he did not examine this incident, but claimed it was a “regular phenomenon for facilities and civilians to be misused for military purposes”, and that “all” “civilian targets [...] had been turned into military facilities”:T.41505-41506.</p>
<p>The murder of prisoners was not under KARADŽIĆ’s control/authority because the daily sitreps from the VRS GŠ contained no information about the killings:D3864,para.130.</p>	<p>Confronted with evidence that, in addition to receiving daily sitreps, KARADŽIĆ also spoke with MLADIĆ on 13 July, DERONIĆ on 13-14 July, KOVAČ on 13, 14 and 15 July, and received a report every day from the VRS GŠ Security Organs, conceded not having this information when writing his report:T.41574-41577.</p>
<p>KARADŽIĆ thought that the Branjevo Farm killings were combat deaths when he ordered an investigation in March 1996:D3864,para.427.</p>	<p>Confronted with evidence that KARADŽIĆ’s only source of information about Branjevo Farm was an interview with Dražen ERDEMOVIĆ, in which ERDEMOVIĆ only spoke of executions, continued to insist that KARADŽIĆ’s order was genuine:T.41581-41585.</p>
Other credibility/reliability issue	
<p>Did not receive, or excluded, significant documents or information from his report:T.41476,41480-41482,41529,41543-41546,41575-41577.</p> <p>Did not provide sufficient references to support facts/assertions in his report; when confronted with deficiencies referred to “common knowledge” and engaged in speculation:e.g. T.41481-41482;D3864,para.78(KARADŽIĆ’s control over the TO). When shown that facts/assertions were inaccurate, conceded inaccuracy or became evasive:T.41485-41486;D3864,para.81(KARADŽIĆ’s authority over the VRS);T.41396-41397;D3864,paras.139-144(adoption of strategic goals);T.41392-41396(nature of directives);T.41412-41415(Sarajevo targeted/random shelling);T.41425-41426(sniping);T.41489-41495(relevance of D325);T.41484-41486,41502-</p>	

41503;D3864,para.105(KARADŽIĆ-MLADIĆ relationship);T.41518-41526,41552-41555;D3864,paras.320,348,360,370,389,401,408(Srebrenica).

Vojislav ŠEŠELJ

Claim contradicted by own statement

Claim

There was no joint criminal enterprise involving KARADŽIĆ, the witness and MILOŠEVIĆ:D3665,paras.32-33,41.

Contradiction

Confronted with previous statements, acknowledged that he supported SDS policies and that he considered KARADŽIĆ a true leader of the Serbian people in Bosnia and a true friend as long as he pursued the policies the witness supported:P6387;P6388;T.39543,T.39563.
 Advocated the unification of a united Serbian state, encompassing all Serbian territories in Bosnia:D3665,para.15;T.39555-39556.
 Threatened before the conflict that Bosnia is “undoubtedly” Serbian, that “any Muslim fundamentalists” who don’t like it will “have to pack their suitcases and leave”(P6387;T.39547) and that if Muslims opposed the attempt to deprive them of nation status, “they will be expelled from Bosnia”:T.39577-39579. Also stated before the war that if Croats resort to “genocidal activities” against the Serbian people, Serbs shall not only take revenge for every victim but “settle scores for the victims of World War I and II(P6391;T.39582) and that if Muslims side with the Croats, “our revenge is going to be terrible”:P6389;T.39574.
 Around 100 volunteers from his party fought in Zvornik at the beginning of the conflict(D3665,para.50) along with Bosnian Serb forces; the operation was planned in Belgrade and included Serbian State Security Service special units, SRS volunteers and ARKAN’s volunteers, with the army providing artillery support where needed:P6388;T.39569-39575.
 Acknowledged that MILOŠEVIĆ provided a great deal of help to RS and “without the help of Serbia, neither the RS nor the RSK would have been able to survive probably”:T.39565.

Mičo STANIŠIĆ

Claim contradicted by own statement

Claim

Contradiction

<p>Shown a 3-Aug-1992 RS MUP report(D1076) stating that paramilitary groups helped the Serbian police and army, could not identify or confirm receiving the report. As the report had no number or signature, it would not have been delivered to him and may have been written by someone from the street:D1076;T.46519,46522.</p>	<p>During re examination, identified the same report as being based on one of his orders:T.46560. Asked by Judge Kwon whether he stood by his previous answer that someone from the street may have written the report, claimed he had not previously recognized the report since his attention had been focused on one paragraph:T.46560.</p>
<p>Denied serving as a republican advisor to the RS Presidency:T.46437.</p>	<p>Confronted with a 7-Apr-1993 letter(P6628) containing a signature under the title “Republican Advisor for Domestic Policies: Mico Stanišić”, insisted it was not his signature:T.46438. Confronted with 36th Assembly transcript(P1382) referring to STANIŠIĆ as a republican advisor, agreed he had received a decision that KARADŽIĆ had appointed him to that position. Asked by Judge Kwon whether he admitted to being a republican advisor, responded “formally yes; but in fact no”:T.46438-46439.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p>	
<p>The March 1992 barricades in Sarajevo were not planned:T.46337.</p>	<p>Confronted with P5612, intercepted conversation where DUKIĆ commented that the incident was a “big test” to which STANIŠIĆ responded “Definitely, it was a live practice”, STANIŠIĆ claimed he made this statement as a joke:T.46456-46457.</p>
<p>The police provided information to the Banja Luka Prosecutor about the identity and whereabouts of the perpetrators of the Korićanske Stijene massacre:T.46547.</p>	<p>Confronted with two contemporaneous BiH MUP documents(D3803;P6630) stating that the barricades incident was planned, STANIŠIĆ claimed he had never seen the first document before and the information in the second document was incorrect:T.46452-46453.</p>
<p>P1097, a dispatch from ŽUPLJANIN contains a translation error. It actually states that detainees which were of no security interest to the army and police “cannot be treated as hostages” rather than “can be treated as hostages”:P1097;T.46496-46497.</p>	<p>Shown a 1999 letter from the Banja Luka police(P6644) stating that the police took no action to identify and arrest the perpetrators of the Korićanske Stijene massacre(D1883) nor was any report submitted to the Banja Luka prosecutor’s office, STANIŠIĆ maintained that the police had cooperated with the prosecutor’s office:T.46546-46548.</p> <p>The meaning of the sentence as “can be treated as hostages” was later confirmed by CLSS:See CLSS Memorandum, Response to Translation Verification Request Exhibit P1097, 10-Mar-2014.</p>

Other credibility/reliability issue

Frequently avoided answering questions, e.g. when asked to confirm that he made the decision to appoint DR LJ AČA as Prijedor SJB Chief (P6638), STANIŠIĆ did not answer the question, instead claiming it was not his signature, and speculating as to who might have signed it (T.46518); repeatedly avoided answering when asked to confirm that he knew in 1992 that members of his police force had committed the Korićanske Stijene massacre (T.46545); when shown RS MUP documents referring to very few Muslim employees in the RS MUP in 1992 (P2760; P6634) repeatedly avoided answering the question asked, instead fixating on formalistic aspects of the documents: T.46485-46488.

Bogdan SUBOTIĆ**Claim contradicted by own statement****Claim**

KARADŽIĆ and the witness believed in October 1995 that prisoners from Srebrenica had been exchanged; witness had no information suggesting the contrary: T.40094; D3695, para.185.

SRBH did not have a territorial defence before 12 May (D3695, para.58)

Doubts that anyone in Pale was informed about the transfer by Bosnian Serb forces of thousands of Muslims to Blagaj Japra: D3695, para.241.

Contradiction

Claimed he had no knowledge of intense pressure on **KARADŽIĆ** to locate the thousands of missing Muslim men and boys: T.40085-40086. Confronted with a 24-Jul-1995 letter from the Special Rapporteur regarding thousands of unaccounted for individuals, claimed he was unaware of that: T.40089-40090. Confronted with a letter from AKASHI regarding the many unaccounted persons from Srebrenica, claimed he attended “practically all the meetings between Akashi and Mr. Karadžić” but he was unaware of this: T.40091-40092. Acknowledged that **KARADŽIĆ** coordinated the TO in April: D3695, para.68.

Agreed, when confronted, that he had testified in *Krajšnik* that he believed “that there is no municipal authority or police force in that area that could have kept this from the government or Pale” and that “I simply cannot conceive that something like that could have happened without anybody having been informed whereas the communication lines were working”: T.40103-40104.

Other credibility/reliability issue

Outlandish allegations, e.g. “Had the killing of Gardović not happened, the war would have been avoided” (D3695, para.28); the police force had been “almost completely cleansed of Serbs by the time the conflict began”: D3695, para.31.

Highly evasive responses, e.g., asked whether he acknowledged that Muslim prisoners were held in inhumane conditions, or denies that or claims he doesn’t know, the witness said he stood by his testimony in the *Krajšnik* case (“that statement that I provided Judge Orić”) and claimed that “you are asking me in a suggestive way for me to accuse somebody or defend somebody in a way and that’s something that I cannot do.”: T.40120.

Novak TODORVIĆ

Novak TODORVIĆ	
Claim contradicted by own statement	
Claim	Contradiction
There were “quite a few” cases of prosecutions of VRS soldiers for war crimes against the civilian population under Art.142:T.34075.	Acknowledged that there were no cases in which the VRS Military Court prosecuted VRS soldiers for war crimes under Art.142:T.34076.
Claim contradicted by other reliable evidence	
Claim	Contradiction
There was not a single case involving Serbs accused of serious crimes, such as the murder of Muslims or Croats, being released from detention to return to their original units:D2986,para.15.	Shown documents evidencing the release of soldiers alleged to have committed war crimes at Velagići on 1-Jun-1992 after nine days in detention (P3513;P3614;P6143;P3616), denied knowledge of the case:T.34075.
Sentences were the same for Serb soldiers who killed other Serbs as they were for Serb soldiers who killed Muslim or Croat civilians:D2986,para.19;T.34082.	When confronted with: <ul style="list-style-type: none"> • 22-Jun-1993 Banja Luka Military Court (“BLMC”) judgement, sentencing Serb soldier to 12 years in prison for the murder of a Serb boy(P6145), contrasted with • (i) 21-Oct-1993 BLMC judgement, sentencing Serb soldier to four years six months in prison for murder of two Muslims and attempted murder of two others(P6146); and [REDACTED]
Despite living and working in VRS Supreme Court in Zvornik in July 1995, witness only learned of the Srebrenica murders “many years later”, and “whether they really happened and what kind of murders, I still do not know today”:T.34091.	said it was difficult to compare sentences in different cases and denied knowledge of these cases:T.34086-34087. Confronted with a PBS television interview with him on 25-Jan-1996 about the murders, TODORVIĆ continued to assert that at that point he still knew nothing about the murders:T.34092.

Miroslav TOHOLJ

Miroslav TOHOLJ	
Claim contradicted by own statement	
Claim	Contradiction
Vatican had information about crimes in Srebrenica in advance, on 12 July:D3981,para.87.	Admitted the date is 13 or 14 July, and that he did not read the article that supposedly talked about genocide in Srebrenica:T.42954-42955,T.42959.

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Confidential

Was not involved in disseminating propaganda:T.42928.	Confronted with a decision on the appointment of the SDS Commission for Information and Propaganda(P6486), admitted that he was appointed to that Commission:T.42931.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Put all material on the KARADŽIĆ website, even unfavourable:D3981, para. 78;T.42964-42965.	Confronted with his letter from KARADŽIĆ stating that KARADŽIĆ deleted all material “that I thought should not go” on the website, including “our worst disgraces”(P6291), responded that KARADŽIĆ was employing a “a special kind of jargon that is close to the jargon that is used in love”, that it was not manipulation but “encouragement, spurring on some positive feelings”:T.42963-42965.
Other credibility/reliability issue	
Claims of Serbian crimes in Srebrenica were a Vatican forgery:P6488;T.42957-42958. Never read the 2004 RS report on crimes in Srebrenica(P6220), but claims it is an “extorted document”:T.42960-42962.	
Had contact with KARADŽIĆ when he was a fugitive:T.42962,T.42982.	
After claiming no one ever talked to him about the missing archives, immediately added: ‘Perhaps there is a record and then my denial can be refuted’:T.42968.	

Aleksandar VASILJEVIĆ	
Claim contradicted by own statement	
Claim	Contradiction
The JNA did not become a Serb army because not all Muslims left the JNA by 19-May-1992:T.34690.	Confronted with his <i>S.Milošević</i> testimony confirmed that in spring of 1992 the JNA was cleansed of non-Serbs and those such as himself who wanted a multi-ethnic army:T.34672-34673. Shown a statement from ADŽIĆ that over 80% of JNA personnel came from BiH and over 90% were BiH Serbs(P6170,pp.3,9), VASILJEVIĆ stated he “suppose[d]” the information was correct:T.34691-34692.
The JNA did not change its mission, did not take sides and remained a buffer between the opposing sides, although some local JNA commanders supported local Serb forces:T.34673,34677-34682.	Confronted with a document confirming the SSNO directive to protect the Serbian people(P2601), admitted that the JNA protected the Serbian people in danger:T.34673-34675. Confronted with reports showing the issuance of weapons and equipment to Serb TOs(P5431,P5432,P6169), admitted that the JNA cooperated with the Serb TO(T.34675-34680); confirmed that local Serb commanders requested weapons and equipment from the JNA and General

	ADŽIĆ centralized this process through the chain of command:T.34679,34683-34686; <i>see also</i> D3065,para.207.
Serbs in Croatia and later on BiH did not have paramilitary organisations. There were armed Serbs but these were all minor situations:D3065,para.88.	Confronted with a transcript of an audio recording of talks between KOSTIĆ and ADŽIĆ(P6170,p.22), confirmed that SDS paramilitary forces had control in Bijeljina, Zvornik and Višegrad and also mentioned the forces infiltrating from Serbia:T.34693. He also confirmed that paramilitaries and volunteers he observed in Croatia reappeared in BiH, such as ARKAN's men in Bijeljina, and that he was aware that some of them looted, mistreated non-Serbs and killed POWs and civilians:T.34700.

Jovan ZAMETICA

Claim contradicted by own statement	
Claim	Contradiction
Knows of no threats made at the end of May 1995 to the UN detainees:T.42476.	Confronted with a 26-May-1995 Reuters press statement quoting ZAMETICA as stating "If the NATO alliance wishes to continue with the air strikes than it will have to kill the U.N. troops here on the ground"(P6474), denied these words, claiming this line was not his:T.42502-42504.
KARADŽIĆ did not issue any order about taking UN personnel prisoner:T.42494,42497,42505-42506	On cross-examination, could neither confirm nor deny that KARADŽIĆ issued the order to take UN prisoners:T.42505-42506.
Authenticated his AFP statement dated 17-Jul-1995(D3931), denying allegations of torture, rape and deportation of Muslim civilians made repeatedly without independent verification, saying the truth was they never happened:T.42485-42486.	Could not answer Chamber's specific question as to what steps Serbs took to verify reports of Srebrenica events:T.42486-42488.
Claim contradicted by other reliable evidence	
Claim	Contradiction
"I think I was privy to everything that was important":T.42443.	Initially signed a statement denying any RS leadership policy decision to take UN prisoners; confirmed this was contradicted by a 30-31-May-1995 intercept involving DUTINA, KRAJIŠNIK and KARADŽIĆ , based on which "[a]ny Prosecution could establish that, in fact, either [ZAMETICA] is lying or he's a fool being fooled by the [RS] leadership":T.42490-42494. ZAMETICA later established that it was the latter by stating "I personally opposed the whole policy of taking UN personnel prisoner":T.42503.
ZAMETICA relied on the 17 July agreement signed by	When confronted with evidence of Robert FRANKEN(P4175,paras.105-106)

<p>Bosnian Muslims, Serbs and UNPROFOR as evidence there was no maltreatment of Muslims in Srebrenica:T.42485-42486.</p>	<p>confirming that the agreement was executed under duress and the population had no realistic choice to stay, ZAMETICA speculated that perhaps FRANKEN felt ashamed, wanted to re-paint history or his own role then eventually conceded that it was “theoretically possible” the agreement was signed under duress “but how was I to know that”:T.42543-42546.</p>
<p>Vítomir ŽEPINIĆ</p>	
<p>Claim contradicted by own statement</p>	
<p>Claim</p> <p>“Karadzic often expressed the view that Serbs could not live together with Muslims, but I understood this to mean that they could not live together politically or culturally, not physically. I never understood Dr. Karadzic to favor physical separation of Serbs and other ethnic groups through expulsions.”:D2923,para.30.</p>	<p>Contradiction</p> <p>Confirmed his prior testimony that when KARADŽIĆ told him that life together in Bosnia between two nationalities was impossible, witness asked KARADŽIĆ what would happen to the mixed marriages in witness’s family, and added, “Not only about what was going to happen with my family but what will happen with about 65 percent of mixed families in Bosnia-Herzegovina”:T.33588. Confirmed his prior testimony that when PLAVŠIĆ maintained that Serbs and other nationalities could not live together, witness told her that “if you tried to separate the ethnic communities, then there would be violence and thousands of innocent civilians would be killed”:T.33589-33590. Further, KOLJEVIĆ stated that the ethnic communities could not live together and the Serbs should just expel the Muslims; KOLJEVIĆ’s extreme views were “very evident at some of the most important meetings and gatherings”:T.33594-33595.</p> <p>In re-direct, when asked “did you ever get the impression that I was in favour of anybody being expelled from Serbian areas?” answered, “Well, I cannot answer that question”:T.33656.</p>
<p>STANIŠIĆ arrested ŽEPINIĆ and told him KARADŽIĆ had ordered his arrest. However, ŽEPINIĆ did “not believe that Dr. Karadžić was involved in the decision to arrest me”:D2923,para.74.</p>	<p>Agreed with his prior statement that he learned on the fifth or sixth day of his imprisonment that KARADŽIĆ had stated ŽEPINIĆ should be killed, but insisted that the investigation and procedure be completed first because STANIŠIĆ had publicly announced the arrest:T.33605.</p>
<p>While detained at Kula and Lukavica barracks, was treated “fairly” by prison officials:D2923,para.76.</p>	<p>While interrogated, was subjected to physical violence by members of the RSMUP as “normal procedure”; the exception was Tomo PUHALAC, an inspector “who was extremely fair in his behaviour”:T.33610.</p>

Claim contradicted by other reliable evidence	
<i>Claim</i>	<i>Contradiction</i>
When KARADŽIĆ , in conversations with ŽEPINIĆ, threatened to divide the MUP, ŽEPINIĆ did not take these comments seriously: D2923, paras. 35, 40, 43, 47.	Agreed he was unaware at the time of events/meetings at which the division of the MUP was concretely discussed by Bosnian Serb officials, e.g. 11-Feb-1992(P1083); 24-Mar-1992 KARADŽIĆ Assembly speech (P961, pp. 21-22); T.33598-33599.

ARK

Miloš BOJINOVIĆ

Claim contradicted by own statement	
Claim People who were leaving on buses were mostly Muslims, but there were others too: Croats, Serbs, mixed marriages. Witness claimed that “[w]ho was leaving and for what reasons, I wouldn’t know”:T.44716.	Contradiction Admitted he knew “perfectly well why they were leaving [...] [t]hey were leaving because of uncertainty”, referring to the need to be safe from “unofficial elements”:T.44719. Similarly testified in <i>Brdanin</i> that the resettlement agency was established to protect people from the many “illegal acts” of “unofficial elements”. Whoever felt unsafe would address the agency; the majority were Muslim:D4176,pp.136,138.
Claim contradicted by other reliable evidence	
Claim Had no official position in the SDS; not a member of the SDS Main Board:T.44697. Was not first President of Glamoč SDS:T.44700.	Contradiction When confronted with a document from the Defence exhibit list(P6558) listing members of the SDS Main Board including BOJANOVIĆ at number 3, witness claimed the document was not in fact a list of Main Board members and claimed it was not “official”:T.44696-44698. When confronted with a 1995 statement from a Glamoč resident that he was the first President, witness admitted he chaired SDS meetings, but claimed he had not been officially appointed:T.44701-44702.

Radoslav BRDANIN

Claim contradicted by other reliable evidence	
Claim ARK CS policy never included forcible transfer or deportation:D4034,para.23. There was no relationship of subordination or hierarchy between the ARK and municipal crisis staffs:D4034,para.20.	Contradiction Agreed that he was convicted of multiple crimes including persecutions, deportation, forcible transfer and willful killings:T.43641-43642. Agreed that the Trial Chamber found and the Appeals Chamber affirmed that ARK municipalities “unquestionably” accepted the authority of the ARK CS as “an intermediate level of authority between the republic level and the municipalities to issue binding instructions”:T.43643-43646. Further, his Trial Chamber found that the crimes charged were the implementation of a plan that originated “from the top level of the Bosnian Serb leadership and whose

	<p>implementation by the municipalities was co-ordinated by the regional authorities of the ARK”:T.43647-43648. Confronted with specific documents demonstrating such a hierarchical relationship(P3497), the witness conceded that it was “correct” that some municipalities accepted the ARK CS but “it depended on the decisions made by me and the other officials”:T.43655-43656.</p>
<p>Witness and the ARK CS did not want non-Serbs to leave and pursued a non-discriminatory policy toward all ethnicities:D4034,paras.23-24,26.</p>	<p>Confronted by the findings of his Trial Chamber that “in unambiguous terms and in a frightening manner” he called upon the non-Serb population to leave, causing non-Serbs to leave in fear and inciting people to commit crimes against non-Serbs, he acknowledged that his statements “could have been harsh and offensive” but they were addressed to the national leaderships rather than the Muslim or Croat peoples:T.43699-43701. Then, when confronted with his comment that “it is the obligation of Serbs over the next hundred years to wipe their feet from the foul non-Christians who have befouled this soil of ours”(P6515.p.2), he stated that “when a person is enraged and angry” he “can say all sort of things”:T.43703-43704. When confronted with his comment that Serbs should put up “barbed wire” so that “never again will our enemies spread throughout Krajina”(P6515,p.2), he claimed that was a “figure of speech” and that separation was better than “people being killed”:T.43704-43705. Finally, confronted with his Assembly comment that the greatest wonder in the world would be “that BRĐANIN could participate in a process of return of Croats and Muslims”(P1392,p.50), stated that when someone suggested that he was creating a new form of brotherhood and unity and that he wanted Croats and Muslims to return, he said they should not resort to that:T.43707-43708.</p>
	<p>Other credibility/reliability issue</p> <p>ARK CS was “superfluous” because the ARK Assembly and the Executive Committee existed at the same time and Nikola ERCEG was “superior to me”:D4034,para.12. This is contradicted by Defence witness ERCEG’s testimony that after the ARK CS was set up, the Assembly and Executive Committee effectively ceased to operate, BRĐANIN became the number one man, and ERCEG reported to him:D4086,paras.12-13,18.</p>
	<p>Claimed that non-Serbs were dismissed due to security and loyalty concerns:D4034.para.15. This is contradicted by ERCEG’s testimony that dismissals were “no doubt [...] motivated by reciprocity”, adding that such steps “did not have to be taken” and were a retaliatory response to “what was happening in Bosnia and Herzegovina where the other crisis staffs [sic] considered Serbs disloyal”:D4086,paras.99-100.</p>

Nikola ERCEG

Claim contradicted by own statement

IT-95-5/18-T

Confidential

<p>Claim</p> <p>Everyone had the right to their property even after moving out:D4086,para.69.</p> <p>There was a “total breakdown of telephone lines, all forms of communication [...] [e]verything was cut...all the communication lines with us had been severed”:D4086,para.29.</p>	<p>Contradiction</p> <p>Confronted with the suggestion that “you don’t know really whether people had the right to their property or not” confirmed “Correct”:T.44065.</p> <p>Agreed that the ĐERIĆ instructions of 26-Apr-1992 “somehow made it through this impenetrable barrier”:T.44080. When confronted with a 29-Apr-1992 document from him to Municipal presidents enclosing an order from Sarajevo(P6531), witness claimed “I’d never seen it”:T.44081. Then, when confronted with a previous draft of his amalgamated statement, in which he referred explicitly to this document as an “enactment of mine” which “relies on an order of the Ministry of Defence” he agreed he had confirmed it was his document:T.44083. Asked whose idea it was to take this paragraph out of his statement, witness said that he had “no way of knowing”:T.44083.</p> <p>Conceded stating in a previous interview that he believed that guidelines from Pale were forwarded using the military communications system and a messenger service:T.44085.</p>
<p>P3647, an order from the Sanski Most CS to the TO Staff, was a “completely autonomous decision of the Sanski Most Crisis Staff”:D4086,para.85.</p> <p>BRĐANIN’s relations with the SDS leadership were good for a time but changed such that at one point he left the SDS:D4086,para.26.</p>	<p>Agreed when confronted that the order “reflected the hierarchy, beginning with the republican level and going down to the municipalities via the intermediate level of the ARK” and the “republican level decision on taking all necessary measures” to which the ARK responded by issuing orders to disarm paramilitary formations which Sanski Most then implemented:T.44093-44094.</p> <p>Confronted with the fact that BRĐANIN didn’t leave the SDS until years after he was president of the ARK, witness admitted “I don’t know about these dates”:T.44086. Also agreed that in 2001, he had told investigators that BRĐANIN had a “very good relationship” with KARADŽIĆ, it was “obvious”, one could “feel it, that there was the common goal that they all shared which brought them all together”(T.44088) and that “what I said ten years ago was obviously more accurate than what I’m saying now”:T.44091.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>ARK was formed at the outbreak of the war due to the impossibility of communications with Pale:D4086,paras.22,34.</p>	<p>Contradiction</p> <p>When confronted with the proclamation of the ARK on 16-Sep-1991(P3421), witness said it was “not the same” ARK established due to war activities:T.44076-44077.</p>

Duško JAKŠIĆ

Claim contradicted by own statement	
Claim	The ZOBK project and constitutive session was not founded on a national basis but on economic reality:D4259,para.21. Until the independence referendum, all three ethnicities supported regionalization in Krajina:T.46159.
Contradiction	Agreed that the HDZ and SDA were against the creation of the ZOBK because they saw it as an entity dominated by one ethnic group:T.46172. Shown statements from HDZ and SDA representatives that the ZOBK was “unconstitutional”, “done behind the backs of others” and created for political rather than economic reasons(P6615), agreed that this was the other parties’ position:T.46173.
Claim contradicted by other reliable evidence	
Claim	Not true that an ethnically clean Serb area was created in RS:T.46185.
Contradiction	Shown a video from a talk show in which, while discussing the peace plan proposal, witness said: “[n]ot a single area could be found that is not ethnically clean Serb area” (P6618), conceded that it was very difficult to find RS areas where they could have made concessions without giving up ethnically pure Serb areas:T.46185-46188.
Other credibility/reliability issue	
	Having testified that the SDS had nothing to do with regionalisation(T.46170), confirmed that he had never been an SDS member or attended a single SDS meeting:T.46171.

Dragomir KESEROVIĆ

Claim contradicted by own statement	
Claim	JNA and IKK “did everything through a long period of time to calm down the situation, to keep it under control, to ensure protection for all ethnic communities”:T.40915. “The sole purpose was to make the area more peaceful and safer. After all, the people everywhere, including in [BiH], felt safer if they had army units deployed in certain areas”:T.40956. “[P]erpetrators were arrested and criminally prosecuted” for crimes against non-Serbs:D3848,p.20. Criminal offences against non-Serbs “always ended up by discovering the perpetrators and prosecuting them or applying appropriate
Contradiction	When confronted with numerous references in BASARA’s war record to the role of the 6 th Brigade in arming and protecting the Serbs in Sanski Most(P3660,pp.2-3), witness confirmed, “[i]t is true that the 6th Brigade had a task to protect the Serbian population in view of the fact that in the previous two world wars they suffered at the hand of their neighbours: Croats and Muslims”:T.41948-41952. When asked whether aware of anyone being prosecuted for the Večići massacre, stated that proceedings were “initiated” but “I don’t know anything about the epilogues of those activities, I didn’t analyse them. I don’t know how that all ended up” and could not point to any prosecution during the war for IKK

<p>measures against them”:T.40955.</p>	<p>soldiers for this crime:T.41938-41939. Agreed that VRS soldiers committed a mass killing of Muslims at Velagići School in Kluč on 1-Jun-1992:T.41942. When confronted with the fact that the perpetrators weren’t prosecuted until the year 2000, the witness referred to “proceedings” being conducted stating, “the way they ended is something that is for a different type of analysis that I did not do”:T.41943-41944. Did not know if anyone was convicted for these killings before the end of the war:T.41945-41946. Eventually conceded that his claim of “prosecution” included merely taking a criminal report and sending perpetrators back to the front:T.41947;<i>see also</i> T.42018-42019.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>There was no forced departure of Muslims and Croats in 1992. Each group wanted to go where their group was a majority:T.41955. The documents of the Accused, Main Staff, IKK and civilian authorities “show that they insisted that no pressure should be put to bear on the population, forcing them to move out”:T.41955-41956.</p>	<p>Contradiction</p> <p>Confronted with excerpt from Sanski Most CS member’s diary, stating “everyone resisting Serbian authorities will be expelled together with their families”(P3635.p.13), did not deny it referred to expelling families, merely noting that this was an addition to expelling extremists:T.41966-41967. Confronted with notes of 25-May-92 CS meeting which it was stated “Captured civilians to be used for exchanges” and “/Take/ no prisoners if armed”(P3329,pp.32-33), claimed that “[o]nly what is stated in an official document in keeping with professional rules is something we could consider to be correct and official conduct”:T.41978. When confronted with a Sanski Most MUP report noting the capture of 2,000 civilians during the attack on Mahala(P3928), continued to insist that there was no official policy of capturing civilians:T.41986-41988. Confronted with notes of a 26-May-92 CS meeting during which Major BRAJIĆ states “prisoners of war are to be taken over from MUP, held overnight, and the most extreme among them isolated and punished so as not to walk this earth”(P3329,p.33), claimed this phrase should be understood “in a symbolic light” and was “not something that can actually be implemented”:T.41979-41980. When confronted with the fact that after the operation in question Muslims were indeed imprisoned and beaten to death in Sanski Most, the witness agreed, but insisted there was no such plan:T.41980.</p>
<p>Other credibility/reliability issue</p>	

In spite of credentials reflecting military and academic expertise(D3848,pp.101-102) testified that he only found out in 2011 that civilians could not be POWs:T.41994.

Vojo KUPRESANIN	
Claim contradicted by own statement	Contradiction
<p>Claim Was not aware that KARADŽIĆ was involved in any way in regionalization:“Radovan Karadžić was not to be found even in traces” and denied (“I don’t think it ever happened”) that he ever spoke to KARADŽIĆ about regionalisation:T.43472-43473.</p>	<p>Confronted with two intercepts discussed in his statement reflecting KARADŽIĆ bragging to KUPRESANIN about having created regionalization:(D1084, cited in witness’s statement(D4011, para.30);D424, cited at D4011, para.30), first said that he hadn’t read the intercepts, despite the fact that his statement said the contrary (T.43473), then said “I don’t remember” that he and KARADŽIĆ discussed regionalization at any time (T.43476) and finally admitted one of the conversations but said that KARADŽIĆ didn’t “participate” in the process:T.43478.</p>
<p>The purpose of the regions was “the economic assertion, self-assertion of Krajina” not the destruction of Bosnia:T.43467-43468.</p>	<p>Confronted with his 1992 statements that “[l]ast year we built up the region and made it strong with the clear purpose and goal, the task of the region of Krajina was to destroy Alija’s state”(D456,p.70;T.43468) and it was “our holy mission” that Bosnia “cease to exist”(P12,p.13;T.43470), said he didn’t “remember” saying that task was to destroy:T.43468-43469.</p>
<p>“I was concerned about Muslims and Croats because of the situation they found themselves in”:T.43504.</p>	<p>Confronted with his contemporaneous statements that Muslims in Cazin Krajina should be shut off in a ring because of concern for Bosnian Serb “living space”(D84,pp.26-27); that Serbs should conquer territories in which Serbs were a minority because of WWII(D456,pp.24-25); that Bosnia had always been a Serbian land and in that state there could not be three masters(P1394,p.47); and that war was necessary because otherwise there would be too many Muslims(P921,p.77), witness stated that there were great problems during the war with Cazin Krajina even though the statement was made before the conflict began, that he “probably” meant Muslims in Cazin Krajina were a threat as a military power, that Serbs were indeed “the remains of a people whose throats had been cut” and that “the Muslims are Muslim Serbs and so there can’t be three masters”:T.43505-43509.</p>
<p>KARADŽIĆ opposed efforts to replace former cadres with SDS staff,“and insisted on the old staff remaining in their old</p>	<p>Confronted with an intercept in which KARADŽIĆ learns that a Muslim is director of Banja Luka radio, responds “What the fuck!” and demands his</p>

<p>positions”:D4011,para.22.</p>	<p>dismissal(P6509), a 29-Oct-91 Sarajevo SDS order(P2548), ARK Assembly minutes notifying KARADŽIĆ that not all conclusions from 26-Oct-91 could be successfully carried out(P5551) and plebiscite speech(P958,p.4), witness then changed his approach to suggest that there was nothing wrong with such dismissals:“What’s so sinful about that?”(T.43527); “So what’s so bad about that?”(T.43529).</p>
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KW-426	
Claim contradicted by own statement	
<p>Claim</p> <p>When the war broke out, there was no direct communication between Krajina and Pale:D4300,para.3.</p> <p>[REDACTED]</p>	<p>Contradiction</p> <p>When challenged, qualified this, saying that “communications were bad” with total interruptions “at times”:T.46707. Confronted with the fact that between mid April and late June 1992, the RS MUP produced daily bulletins containing information from municipalities in the CSB Banja Luka area(P2748;P2749;P2791;P2762), stated: “I was not directly involved in communications, so I can’t speak about them”:T.46708.</p> <p>[REDACTED]</p>
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Most Special Police Unit members were conscientious and responsible, and unit members were removed for committing crimes:D4300,para.11. Paramilitaries responsible for crimes at Omarska camp:D4300,para.37.</p>	<p>Contradiction</p> <p>Confronted with 13-Jun-92 report from Prijedor SJB Chief Simo DRLJAČA to CSB Banja Luka describing misconduct at Omarska by special police unit members(D4139), witness claimed the “main problem” were units from Slovenia and Croatia out of army control:T.46715-46716.</p> <p>[REDACTED]</p>
Other credibility/reliability issue	
<p>Consistently evasive, e.g. T.46717,46725,46728-46730.</p>	

Milorad SAJIĆ

Claim contradicted by own statement	
Claim	Contradiction
<p>Between the outbreak of war and the forcing of the corridor in late June “there were no links with Pale”:D4114,para.12.</p>	<p>Acknowledged receiving SUBOTIĆ’s 16-Apr-92 mobilization order and implementing it on 4-May-92:P2412; P2818;D4114,para.19. Confronted with VUKOVIĆ’s evidence on the teleprinter connection, stated “[t] hat was the only connection that I deemed usable, the teleprinter in the centre for information and communication”:T.44131.</p>
<p>“Some municipalities did not accept the decisions of the ARK crisis staff”:D4114,para.55.</p> <p>Denied that the statement: “[a] portion of the Muslim and Croatian population is moving out, and the Region of Bosnian Krajina has issued a decision to facilitate such departures, providing that Serbs from Central Bosnia and places with predominantly Muslim and Croatian populations were also allowed to move out. Those departing will not be allowed to return”, contained in the 1-Jun-92 IKK report(P3656), reflected the implementation of the first strategic goal in the Krajina:T.44154-44156.</p>	<p>Agreed he could only speak about Banja Luka; unaware of the extent to which other ARK municipalities accepted ARK CS conclusions:T.44132.</p> <p>When asked in <i>Brdanin</i> whether this reflects the first strategic goal, he testified, “[t]o leave room for those who will be coming from elsewhere, the Serbs coming from other parts. In that sense, yes.... It is linked up in the text. In the statements, it is all linked up. Yes.”:P6534,pp.167-168. Confronted with this testimony, was evasive, stating, <i>inter alia</i>, “I’m not denying what I said as a witness against Brdo. However, the question is now put in a different context. If you were to ask me whether the moving out of Muslims was carried out or – in an organised manner, I would say no. If you ask me the same question in a different way, I would say yes.”:T.44158-44161.</p>

Banja Luka

Andjelko GRAHOVAC	
Claim contradicted by own statement	
Claim	Contradiction
The Krajina leadership's attitude could be summed up as "Who gives a fig about [KARADŽIĆ] [...] we're going to do as we please":D4077,para.26.	Agreed that KARADŽIĆ's opposition to the establishment of a Krajina state was determinative and that KARADŽIĆ "was the greatest authority for us and he had the best ideas and the best solutions for all issues crucial to the Serbian people in Bosnia-Herzegovina.":T.44053.
Claim contradicted by other reliable evidence	
Claim	Contradiction
KARADŽIĆ favoured the arrest of members of MILANKOVIĆ's unit and his attitude was that Serbs could not rely on criminals:D4077,para.31.	Confirmed that MILANKOVIĆ's unit was incorporated into the regular army(T.44045-44046) and praised by KRAJIŠNIK:P3001,T.44050-44051. When confronted with TOLIMIR's 1995 report on paramilitary formations on RS territory evidencing continued commission of crimes by MILANKOVIĆ's "Vukovi"(P2855,p.4), denied the whole unit was problematic, stating "we did not have a choice" in using such people:T.44047-44048. Considered membership of the Vučijak Wolves would be "an honour":T.44056.
Other credibility/reliability issue	
Was not involved in politics for seven/eight months following his dismissal as ARK Prime Minister in December 1991, and eliminated from KARADŽIĆ's circle and that of other RS/ARK leaders during 1992:T.44036-T.44037.	

Radomir RADINKOVIĆ	
Claim contradicted by own statement	
Claim	Contradiction
Maximum number of prisoners at Manjača at one time was around 2,000:T.45312.	Confirmed his prior BiH State Court testimony that the prison population was almost 3,000 and at one point went up to 4,500:T.45312.
Denied that non-Serb civilians were rounded up and detained arbitrarily: T.45319,T.45323.	

	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>and further categorically claimed “with full responsibility” that not a single person was arrested on ethnic grounds:T.45323.</p>
<p>Other credibility/reliability issue</p> <p>Despite claiming to honour Geneva Conventions, maintained that because of camp regulations, he and other camp personnel were not permitted to intervene to prevent the killing of prisoners 20-30m away from them outside camp grounds:T.45336-45338.</p>	

Bijeljina

Gojko ČEKIĆ	
Claim contradicted by other reliable evidence	
Claim	<p>The contention that Batković detainees were beaten or forced to engage in degrading sexual acts is “a complete lie”. The witness “would certainly have learned about” such shocking acts:D3236,para.25.</p> <p>There were no women, children or elderly in Batković:D3236, para.19.</p>
Contradiction	<p>Confronted with evidence of guards beating, torturing, killing and hiding prisoners from the ICRC in 1992-1993, acknowledged that he was never at the collection centre in 1992 or 1993 and “couldn’t have been aware of” such events:T.36493-36495.</p> <p>When confronted with prison records indicating the detention of an 81-year-old and a number of minors during the period the witness was commander, acknowledged this to be true and tried to conform his earlier evidence to this evidence:T.36503-36505. Later acknowledged there was a group of 50-60 elderly people that he claimed were released within 20 days of their arrival:T.36508-36509.</p>

Živan FILIPOVIĆ	
Claim contradicted by own statement	
Claim	<p>Pašaga HALILOVIĆ, a Muslim, led a VRS battalion that existed until the end of the war:D3140,para.20.</p>
Contradiction	[REDACTED]

Milivoje KIĆANOVIĆ	
Claim contradicted by other reliable evidence	
Claim	<p>There was no Serb takeover in Bijeljina. After 31 March things “went on as it was before”:D3089, para.22;T.34881-34884.</p> <p>“There was never a crisis staff in Bijeljina”:D3089,para.27.</p>
Contradiction	<p>Had no explanation for contemporaneous documents/statements(P2629;P956,p.22) expressing a transformation to Serbian rule in Bijeljina:T.34884-34886.</p> <p>Confronted with four contemporaneous references to a Bijeljina CS(P2629;P2626;P5587;P2855,p.5), agreed that a CS “existed somewhere” although he was unaware of it:T.34889,T.34907.</p> <p>Confronted with numerous contemporaneous documents recording the</p>

34898.	expulsion of Muslims, particularly by “Vojkan”(P5483; P5423; P5424; P2073; P1473,p.87), acknowledged that Vojkan was taking Muslims to the front line, but claimed “[t]hey probably requested to go somewhere where they would live better” and then complained that “no one talks here about the multitude of Serbs who had come from the towns which were under Muslim control”:T.34898-34901.
Other credibility/reliability issue	
Large passages of witness’s Rule 92ter statement were identical to another defence witness’s statement, indicating that the statement did not reflect the witness’s own words:T.34879-34881;P6184.	
Dragomir LJUBOJEVIĆ	
Claim contradicted by other reliable evidence	
Claim	There was no CS in Bijeljina:D3144,para.11.
Contradiction	After being shown several contemporaneous references to a Bijeljina CS(P2629; P5587), continued to insist that it did not exist:T.35899-35901.
Svetozar MIHAJLOVIĆ	
Claim contradicted by own statement	
Claim	AF2264, describing a plan to rid Bijeljina of Muslims by killing a Muslim family on each side of town implemented by Duško MALOVIĆ’s special police unit was “absolutely untrue”:D3137,para.21.
Claim contradicted by other reliable evidence	
Claim	Admitted awareness of PLA VŠIĆ’s public statement at the time that it was her choice to first visit the local CS “and meet here with Mr. ARKAN and his associates”(P5587,p.3); had no knowledge of the fact that, three weeks after meeting ARKAN in Bijeljina, PLA VŠIĆ called Arkan’s headquarters and asked him to come to Sarajevo and “bring the merchandise”(P1106,p.2):T.35725-35726.
Claim	ARKAN, a notorious manipulator, imposed himself on Biljana PLA VŠIĆ in Bijeljina in front of the media, which gave the impression they were old acquaintances:T.35722-35723.
Claim	Could not reconcile his evidence that this was an unplanned encounter with the contemporaneous footage depicting KARADŽIĆ handing prepared certificates

KARADŽIĆ was in a meeting and then took the opportunity to have KARADŽIĆ greet the unit. This event “was certainly not planned in advance”:D3137, para.10;T.35721-35722.	to Arkan:T.35728-35730.
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Cvijetin SIMIĆ

Claim contradicted by other reliable evidence	Contradiction
Claim Claimed that SAOs were formed after 15-Oct-1991 in response to SDA/HDZ activities:D3133,para.12.	Confronted with evidence that SAOs were discussed and several SAOs formed well before 15-Oct-1991(P2536,pp.81-82), provided evasive answers and eventually acknowledged that he did not know what was going on outside SAO Semberija:T.35643-35645.
“There was no crisis staff in Bijeljina”:D3133,para.42.	Insisted there was no CS in Bijeljina after being confronted with numerous pieces of contemporaneous evidence to the contrary, including a video depicting 2-Apr-1992 meeting hosted by SIMIĆ where the existence of the CS was mentioned(P2626;P2629;P6211):T.35653-35667.
Other credibility/reliability issue	
Large passages of witness’s Rule 92ter statement were identical to another defence witness’s statement, indicating that the statement did not reflect the witness’s own words:P6184.	

Dušan SPASOJEVIĆ

Claim contradicted by own statement	Contradiction
Claim Approximately half the victims during the Bijeljina takeover were killed during street fighting:D3141,para.20.	In cross-examination, admitted that he never saw anyone get killed, he only saw one corpse, he was not personally involved in collecting bodies from the street, there were no onsite investigations of these bodies, [REDACTED] Ultimately conceded that his claim that half the victims were killed during the street fighting was based on talk among colleagues and “is not a precise conclusion”:T.35842-35843.
Asserted that “[a]ll crimes against the non-Serbian citizens in Bijeljina municipality were handled by the members of the Public Security Station in Bijeljina, and any possible	Confronted with three reports concerning investigations undertaken in 2002(P6215;P6216;P6217), acknowledged that the murder of members of two Muslim families (SARAJLIĆ and MUJAGIĆ) in September 1992 was not

<p>perpetrators that were discovered were handed over to the relevant prosecutor's offices and courts to be dealt with further":D3141, para.18.</p>	<p>investigated at the time, and no investigation initiated until 2002:T.35844-35848.</p> <p>Also acknowledged that the perpetrators of the murder/rape of members of the AVDIĆ family on 14-Jun-1992 by SRS volunteers who had been armed and supplied by the VRS were not tried and punished until 2011/2012:T.35857-35864;P6218;P6219.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>ARKAN had no checkpoints and did not control entry or exit to the town:T.35837-35838.</p>	<p>Contradiction</p> <p>Had no explanation for contemporaneous documents(D1612,p.11;P5474) making clear that ARKAN had set up checkpoints and controlled entry/exit to the town:T.34836-35838.</p>
<p>The commission investigating Srebrenica events that he worked on was under pressure and ignored real facts:D3141,para.19.</p>	<p>Confronted with the actual 2004 report(P6220), could not confirm or deny key findings, and could not point to any finding that was false. Ultimately agreed that the mass executions described in the report did happen:T.35865-35871.</p>
<p>Other credibility/reliability issue</p>	
<p>Provided detailed evidence-in-chief about events in Bijeljina in late March-early April, with no mention of ARKAN(D3141). When asked whether ARKAN's involvement in Bijeljina was not sufficiently important to mention in his evidence, SPASOJEVIĆ gave the internally inconsistent response: "He's absolutely inconsequential to me because I had had some problems with his men concerning crime and I saw no reason to mention him specially":T.35838.</p>	

Bosanski Novi

Radomir PAŠIĆ

Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Denied “shelling” occurred in the Muslim villages of Japra Valley, claiming that the Serb TO did not have tanks and the JNA no longer officially existed:D3849,paras.49,50,51,54,55.</p>	<p>Confined his definition of “shelling” to shelling from heavy artillery with larger armaments:T.41031. Confronted with contemporaneous documents referring to attacks on Muslim villages with mortars and heavy artillery(P3818;P6440;P2632, pp.4-5;D470,p.17), denied hearing any shelling and evaded response:T.41034-41038,41044-41046.</p>
<p>Denied issuing an order to attack Blagaj:T.41038-41041.</p>	<p>Confronted with an intercept of General ŽELJAJA reporting the President of Bosanski Novi municipality had ordered the unnecessary attack on disarmed villagers(P6436), admitted he was the President, but continued his denials of the order:T.41042-41043.</p>
<p>Muslims left Bosanski Novi voluntarily(T.41047-41049) and “there was no motive, desire or intention to expel or evict someone and was not orchestrated from any level of authority.”:D3849,para.58.</p>	<p>Confronted with a conclusion reached at a meeting of representatives of municipalities including Bosanski Novi, that “Muslims and Croats should move out of our municipalities until a level is reached where Serbian authority can be maintained and implemented”(P2641, para.6), PAŠIĆ provided inconsistent and evasive responses :T.41051-41058.</p>
<p>Had no memory of attending the 2nd Inter-municipality meeting on 14-Jun-1992 recorded in P6437:T.41062.</p>	<p>Confronted with his signature on the attendance sheet of P6437, claimed that it was “forged”, scanned and affixed to the document. He verified his signature and offered no further explanation for the “forgery.”:T.41061-41062,41064.</p>
<p>Desired the participation of Muslims in the TO Staff and SJB, which would give civilians a greater sense of security; he would welcome non-Serbs with open arms:T.41109-41110;D3849,para.14.</p>	<p>Confronted with documents wherein the Serbs demand that the 1st KK be purged of Muslims and Croats(T.41058;P2641, para.4;P6438;P6437,p.2), PAŠIĆ avoided answering the simple question of whether he remembered attending a meeting at which this was discussed, but admitted to concerns about treason and espionage:T.41059. Denied any memory of discussions regarding purging the military, in spite of his signature on the attendance sheet(P6437) for a meeting where it was discussed:T.41058-41063.</p>
<p>The official records signed by Muslims that they were leaving the municipality permanently did not mean they must move out permanently:T.41081,41086.</p>	<p>Confronted with an official record stating in three separate sections that the signer is leaving Bosanski Novi municipality permanently(P6439,p.1), PAŠIĆ attempted to redefine the plain meaning of “permanent” and “temporary”, claiming they could not be understood in the general sense that people would be</p>

	<p>prohibited from returning:T.41081-41085. He insisted the document was not legally binding, in spite of its express words “This statement is legally binding”:P6439,p.2;T.41086.</p>
<p>Other credibility/reliability issue Repeatedly responded to questions with long, evasive answers, resulting in the Court chastising the witness several times:T.41021,41041,41054-41055.</p>	

Bratunac

Rodoljub ĐUKANOVIĆ	
Claim contradicted by other reliable evidence	
<i>Claim</i>	<i>Contradiction</i>
<p>Did not receive any oral or written orders from KARADŽIĆ at any time before or during the conflict:T.36168-36171.</p>	<p>Confronted with 19-Oct-1991 minutes of Emergency Meeting of the Bratunac SDS Municipal Board to discuss an order from KARADŽIĆ(P3197) and KARADŽIĆ's declaration of a state of emergency on 18-Oct-1991, ĐUKANOVIĆ responded evasively, claiming DERONJIĆ misrepresented his own orders as KARADŽIĆ's, there was no proof of an order and he could not recall the meeting:T.36171-36176.</p> <p>Further confronted with KARADŽIĆ's 18-Oct-1991 telegram to Zavidovići Main Board regarding the state of emergency(P6238), clarified that he meant that he <i>personally</i> did not receive/see orders, but DERONJIĆ conveyed messages to the municipal board:T.36176-36179.</p>
<p>Unaware of Variant A/B instructions; as Executive Board President and Municipal Board member, he would have known about them had they existed:D3194,para.27;T.36159,36179-36182,36184-36185.</p>	<p>Asserted during re-examination that he would attribute the 19 October minutes to DERONJIĆ's plea bargain agreement with the ICTY Prosecutor:T.36210.</p> <p>Confronted with minutes from 23-Dec-1991 Bratunac SDS Municipal Board meeting discussing SDS Presidency decision to establish a Serbian BiH and issue Variant A/B instructions(P2598), claimed not to remember the meeting, despite the CS—of which witness was member—being activated at this meeting:T.36180-36183.</p>
<p>Did not know who brought paramilitaries into Bratunac:D3194,paras.29,31;T.36185-36186.</p>	<p>Confronted with 6-May-1992 excerpt from MLADIĆ's diary, wherein a JNA general said ĐUKANOVIĆ and DERONJIĆ had brought in the “cutthroats from Vukovar” who are killing all Muslims(P1477, pp.253-254), denied this true and stated he was not sure MLADIĆ wrote the diary:T36187-36188.</p>
<p>Between April and July 1992, there was practically no communication between Bratunac and Pale:D3194,para.51.</p>	<p>Confronted with entries from MLADIĆ diaries showing meetings on 6 and 30-Jun-1992, where KARADŽIĆ and other leaders received information about Bratunac and other municipalities(P1478,p.101,p.258), responded evasively, then finally confirmed that—while difficult—there were communications:T.36190-36192.</p>

Other credibility/reliability issue

Removed from positions within SDS Main Board and RS Assembly and banned from political engagement in 2004 by High Representative for hindering Bosnia's commitments to the peace agreement:D3194,para.3;T.36156-36158.

Dušan MIČIĆ	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>On the morning of 12 July, the 1st PJP were deployed to Srebrenica to search the terrain on the right side of the road between Žuti Most and Potočari, to ensure no one was left in the houses:D3196,para.21.</p>	<p>Confronted with Dragomir VASIĆ's report, 12 July(P2996,para.6):"[j]oint police forces are advancing on Potočari with the aim of taking UNPROFOR personnel prisoner, surrounding the entire civilian population and clearing the terrain of enemy groups," said, "[h]e was my chief, and it's up to him what he wants to write down. I'm only telling you about where I was and what I did together with my unit. I received my tasks from Radomir PANTIĆ directly and not from VASIĆ":T.36228. Shown a video still showing him, other 1st PJP members, Bratunac Brigade members and MAUZER's men walking into Potočari together(P4202,p.71), denied that he cooperated with these other troops in a joint force:T.36237.</p>
<p>On 12 July the 1st PJP was assigned the task of securing the Bratunac to Konjević Polje road, around Sandići. The concern was that the Muslim column advancing from the direction of Bokčin Potok, Donji Mratinjci and Kamenica would cut off the road and endanger those using it:D3196,paras.25-26.</p>	<p>Confronted with VASIĆ's 12 July report stating that the Šekovići Special Detachment and PJP 1st Company are in Konjević Polje and Sandići sector with the goal of blocking and "destroying" the 8000 Muslim men in the column(P4937), said: "I can't say that he's lying [...] It's up to him how he viewed the situation. My view was different":T.36231.</p>
Jovan NIKOLIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>On 14-Jul-1995, Jovan NIKOLIĆ went to his office in Bratunac in the morning, and then to Kravica with Dragan NIKOLIĆ concerning the purchase of raspberries:D3126,para.55;T.35502.</p>	<p>Confronted with his prior statement that he also visited the warehouse at 22:00 hours on 13 July, and learned that there were a lot of dead Srebrenica Muslims there, and that the Special Police from Skelani were there(T.35497-35498), confirmed that he visited the warehouse on the night of 13 July:T.35499. Confirmed he saw a "horrible sight":T.35501. Said his visit to the warehouse on 13 July was not "consciously omitted" from his statement in this case:T.35500. Conceded he called Dragan NIKOLIĆ on the night of 13 July, and they agreed</p>

<p>After he witnessed events at Kravica Warehouse on the morning of 14 July, including prisoners being shot, he immediately went to the municipal authorities and reported the event. They were completely unaware of events. DERONJIĆ said he would report the matter to the Bratunac Brigade Command and civilian protection:D3126,paras.56,58.</p>	<p>to go to Kravica the next day:T.35529.</p> <p>Confronted with his prior BiH statement(P6201) that the clean up crew were already at the warehouse when he was there on 14 July(T.35521-35522), maintained that when he reported events to the municipal authorities they were unaware of what had occurred:T.35522.</p> <p>Said he did not tell DERONJIĆ and other municipal authorities about the killings on the night of 13 July as it was already 22:30 hours when he returned to Bratunac. Said he did not know whom to contact and thought, “it can wait until the following morning”:T35528.</p>
Other credibility/reliability issue	
<p>Said he went to Kravica warehouse late on the evening of 13 July as he was concerned about raspberries:T.35507.</p>	
<p>Confronted with his 2001 OTP statement , in which he failed to mention he reported events to DERONJIĆ on 14 July, refuted the suggestion he lied in 2001 to protect DERONJIĆ:T.35525.</p>	
<p>Confirmed he knows Ljubiša BOROVIĆANIN from before the war, yet when asked whether the Skelani Police were under BOROVIĆANIN’s command at the time of the killings said, “[y]ou can mention Ljubiša or any other people. I don’t know any of them.”:T.35515-35517.</p>	

Mirko PERIĆ	
Claim contradicted by own statement	
<p>Claim</p> <p>[REDACTED]</p>	<p>Contradiction</p> <p>Confronted with the evidence of KDZ605, a Muslim who was captured and detained, PERIĆ stated he did not know what happened in Bratunac as he was not in Bratunac at the time, but rather in Serb villages Rakovac and Podbrde. Acknowledged that he could not say whether or not the Muslims left voluntarily:T.40804-40806.</p>
<p>[REDACTED]</p>	<p>Confronted with Milenko KATANIĆ’s evidence that police participated in the Glogova attack(P4374,para.35), acknowledged that he did not know whether or not the police participated, and that he does not know anything about what happened in Glogova:T.40803-40804.</p>
Other credibility/reliability issue	
<p>Several defence witnesses testified regarding the Jadar River scheduled incident. Their evidence was contradictory, suggesting all defence</p>	

witnesses gave unreliable evidence. PERIĆ denied Nenad DERONJIĆ was at Konjević Polje on 13-Jul-1995:D3852,paras.28-32. Confronted with Nenad DERONJIĆ's evidence confirming that he was at Konjević Polje on 11 and 12 July, maintained that he did not see DERONJIĆ during the three days he was there:T.40788-40789. PERIĆ claimed he alone escorted Rešid SINANOVIĆ to the command centre, and that he did not escort any other prisoner:D3852,paras.20,28.

Ljubisav SIMIĆ

Claim contradicted by other reliable evidence

Claim

Attended a meeting at the Bratunac Brigade Command on the morning of 12-Jul-1995:D3398,para.72.

There was no discussion of the transport of Muslims from Srebrenica and the need to get as many trucks as soon as possible:T.37258.

At the Hotel Fontana meeting on 12 July, the Muslim representatives "asked" that transportation be arranged and the evacuation of the people in Potočari to Kladanj start as soon as possible:D3398,para.73. There was no coercion and the Muslims left Potočari voluntarily:D3398,para.80:T.37265-37266.

Contradiction

Confronted with the statement of Aleksandar TEŠIĆ(D3118,paras.34-35) that there was such a discussion, SIMIĆ maintained there was not:T.37259-37260. Confronted with VASIĆ's 12 July report stating that a meeting "will begin at 1000 hours" "at which an agreement will be reached on the evacuation of the civilian population", "100 trailer trucks have been provided for transport"(P2996), said "who stayed behind or who arrived there later is something I don't know", "what happened next, how long this meeting took and who was there is something that I don't know":T.37261-37264.

Asked if the women and children could have returned to Srebrenica if they had wanted, answered, "[i]n my mind, it would not have been a problem":T.37266-37267. Shown a 17 July DK Command report(P3994) (two women who returned to Kladanj had been shot and killed) said "[t]hese things can be interpreted in a number of ways":T.37268.

Other credibility/reliability issue

Maintained that, although President of the municipality, he did not learn anything about the murders at the Vuk Karadžić school in 1995 until 2008, even when confronted with the evidence of defence witnesses Aleksandar TEŠIĆ, Branimir TEŠIĆ and Milenko KATANIĆ that they learned about the killings within a matter of days:T.37290-37291.

Confronted with excerpt from MLADIĆ's diary relating to a 30-Jun-1992 meeting attended by **KARADŽIĆ**, **MLADIĆ** and various municipality officials at which, following a report from the Zvornik authorities on the cleansing of Zvornik, SIMIĆ stated "[a]ccording to the last census it was 64/36 in favour of the Muslims. In Bratunac municipality we now have two Muslims"(P1478,p.258;T.37301-37302). First claimed he was referring to two Muslim children he had seen on the street and highlighting problems caused by paramilitaries; then claimed he was speaking "ironically" when he said that there were only two Muslims in Bratunac, and—despite the clear wording of the diary—claimed

was referring to Bratunac town rather than the entire municipality:T.37302-37304,37310-37311.

Vujadin STEVIĆ	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Najdan MLADENOVIĆ was not his superior and he “did not know anyone called Najdan”. Denied TALOVIĆ’s claim that MLADENOVIĆ ordered the execution of 20 Muslims who had been captured in Glogova in 1992:D3174,paras.21-22.</p>	<p>Confirmed TALOVIĆ’s evidence(P3188,para.25) that he had told the Muslims to line up beside the supermarket:T.36037. Qualified his previous statement by saying that “at the time” he didn’t know MLADENOVIĆ:T.36037. Confronted with article on MLADENOVIĆ’s BiH trial for crimes in Hranča and Glogova, admitted knowledge of MLADENOVIĆ, stating that MLADENOVIĆ was wounded in 1992 and they first met in 1993:T.36037-36038. Confronted with TALOVIĆ’s statement that MLADENOVIĆ ordered “Dragan” to execute the Muslims(P3188,paras.24,31), confirmed his Christian name is Dragan, yet continued to deny MLADENOVIĆ ordered him to kill the Muslims:T.36039. Challenged that those Muslims he had captured and others were in fact killed, did not dispute the killings, but simply their number:T.36041-36042.</p>
<p>Did not see and was not informed that thousands of Muslims were detained in Bratunac in 1992 and that men were maltreated and killed at Vuk Karadžić school during 1992:T.36045.</p> <p>Other credibility/reliability issue</p> <p>Confronted with testimony that Mihaljevići was set “ablaze” during an operation in which he had participated, surmised that a haystack had been set on fire as a signal to start the disarming process:T.36043.</p>	<p>Confronted with interview in which detainee Sakib AHMETOVIĆ stated STEVIĆ had escorted him to Vuk Karadžić school in 1992(P6232), suggested that AHMETOVIĆ’s statement was motivated by a civil dispute in which STEVIĆ was involved:T.36046-36047.</p>

Aleksandar TEŠIĆ	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Did not hear that any soldiers abused or killed Muslims on 13-Jul-1995 in Bratunac; there were no soldiers in the town. Over the next days he learned there were corpses at Vuk Karadžić school:D3118,para.41.</p>	<p>Agreed that his office in Bratunac was a five minute walk from the Vuk Karadžić school, the hangar and the stadium:T.35317. Confronted with Zoran PETROVIĆ-PIROČANAC’s testimony that he saw a truckload of corpses in Bratunac town, said he was not denying there were crimes, but he never saw them:T.35321. Shown BLOCK’s article in a British newspaper on 21-Jul-1995(P4398) describing accounts by Serbian women from Bratunac and Serbia</p>

	of the killing of Muslim men in Bratunac, said “I didn’t know myself”:T.35322-35324.
Other credibility/reliability issue	
	Saw buses loaded with Muslims in Bratunac on 13-Jul-1995. Believed the Muslims were from Potočari and had stopped in Bratunac for the night on their way to free territory:D3118,para.41;T.35312. Denied he knew at the time those on the buses were prisoners who could not move around the town freely. Said there was no military presence in the town. Claimed the people he saw were elderly people, women and children:T.35313-35315. Conceded that they were guarded by an “escort” on each bus:T.35315-35316.
Branimir TEŠIĆ	
Claim contradicted by own statement	
Claim	Contradiction
Doesn’t know if there was shooting during the night on 12/13-Jul-1995 when the buses with Muslims were parked near the Vuk Karadžić school in Bratunac:D3115,para.37.	Accepted that he had heard shooting that night in Bratunac, “all about the place, from the stadium, from the school.” Said he learned only later about the killings once the school was vacated and civilian protection found the corpses:T.35247-35248.
Denied civilian police guarded the prisoners in Bratunac on the night of 12/13-Jul-1995:T.35246.	Confronted with his 2008 BiH statement, said it was possible the civilian police had assisted in securing the prisoners at the Vuk Karadžić school, but denied that an order was issued that they provide security:T.35246-35247.
The day after the 9-May-1992 Glogova operation, heard “a few hours later” that Muslims were gathered at football stadium. Police were not there:D3115,para.27;T.35252.	When challenged, admitted he knew at the time that Muslims were gathered at the stadium:T.35253-35254. [REDACTED]
Claim contradicted by other reliable evidence	
Claim	Contradiction
Serb authorities had problems with paramilitaries from the beginning, and not only after they attacked Serb homes:T.35261.	Confronted with August 1992 report on SJB Bratunac recording discussion at meeting—attended by witness—of paramilitaries who had “played a role in the war” at the beginning but who “later” began troublemaking, and SIMIĆ’s statement that it was necessary to prevent further looting “because Serbian houses are now being looted too”(P6196,p.3), maintained his position:T.35261-35264.

Other credibility/reliability issue

Confronted with August and September 1992 reports on SJB Bratunac evidencing investigations of crimes by Muslims against Serbs (P6196.p.2;P6197.p.4) and asked why no crimes by Serbs against Muslims were being investigated, claimed that as SJB Deputy Commander this wasn't his job and he "didn't really go into investigations":T.35264-35266.

Acknowledged he went to Potočari on 12/13-Jul-1995 with Dragan NEŠKOVIĆ. Saw a very large crowd of Muslims gathered there:D3115,para.36. Claimed he did not see any separations:T.35272. Said that he did not see any women and children there, rather he was present only for the boarding of the first couple of buses, and he saw elderly persons and able-bodied men being boarded:T.35268-35270. Confronted with NEŠKOVIĆ's statement that he had left when he could no longer stand the pleas for help from the crowd of refugees, claimed he had walked through the crowd independently of NEŠKOVIĆ:T.35270.

Brčko

Petar KAURINOVIC

Claim contradicted by own statement	
Claim Upon his return to Brčko in early May 1992 the paramilitaries were in authority:D3003,paras.18,21-24.	Contradiction Confronted with his OTP statement that CS “were the one who were the authority in town” on his return to Brčko, claimed that while he thought the CS was in power, he subsequently came to the conclusion that the CS did not have power:T.34120-34122.
In an early May 1992 radio request that police officers report to their workplaces, “[t]hey didn’t mention Serb or any other ethnicity. They simply stated that policemen should report to their workstations”:T.34122-34123.	Confronted with his OTP statement he heard a radio call that “the police officers of Serb ethnic origin were called to report[...]to their work”(P6147,p.1), stated, “I really don’t remember whether it was expressly stated that only Serb policemen should report. I was completely unaware of the situation in Brčko at the time”:T.34124.
When identifying bodies of 60 executed Muslim people in civilian clothes, “didn’t pay much attention to whether they had been shot at close range” and was “not in a situation [...] to assess”:T.34125-34126.	Claimed not to remember his OTP statement that he observed that they had been killed “at close range to the head, mostly”:T.34126. Confronted with his previous confirmation that “none” of the bodies were soldiers, witness stated he didn’t know whether or not they were engaged in military activity:T.34126-34127.
It was “impossible” that he had previously seen some of the executed people being assembled and detained outside Brčko police station:T.34127.	Confronted with his OTP statement, accepted that he “recognised a few of them in front of the station as well as at the site of identification”:T.34128.
Claim contradicted by other reliable evidence	
Claim Kosta SIMONOVIC was never member of the MUP:D3003,para.32.	Contradiction Confronted with list of Brčko SJB employees showing that Kosta SIMONOVIC was MUP employee(P3005), accepted that SIMONOVIC wore a police uniform during the war:T.34133.
Other credibility/reliability issue	
Witness was SJB Brčko member who went to Luka Camp during period in which crimes were being committed by his associates:D3003,paras.2,25.	

Obren MARKOVIĆ	
Claim contradicted by own statement	
Claim Unaware that paramilitaries came to Brčko prior to war breaking out:T.34781.	Contradiction Confronted with evidence of the formation of CAPTAIN DRAGAN's special unit 4-6 months before the war(P2888,p.3), accepted that "we heard of the existence of these units":T.34783.
Claim contradicted by other reliable evidence	
Claim Once the armed conflict broke out, local authorities were in disarray, criminals and paramilitaries took advantage of this anarchy, and the authorities were unable to suppress their criminal activities:D3073,paras.29-30.	Contradiction Confronted with evidence that the Serb authorities invited in and worked with the paramilitaries, i.e. Brčko War Presidency report stating that members of a special unit of Serb forces who arrived in Brčko "joined the police intervention platoon"(P2888,p.3); September 1992 Eastern Bosnia Corps report that Bijeljina leadership had sent about 550 fighters to Brčko, among them MAUZER, GAVRILOVIĆ and Arkan's men(P2889); BLAGOJEVIĆ statement that he and his unit they put themselves at the disposal of the Brčko CS and had good cooperation with the military in taking over the city(P2901,p.9), denied knowledge:T.34786-34787. Brčko police were actively involved in the crimes: MARKOVIĆ personally signed documents(P6176;P6177) confirming that some of the perpetrators of crimes at Luka Camp were police officers when they committed those crimes:T.34792-34796. Confronted with 7-May-1992 dispatch from Bijeljina Security Services Centre to Minister of the Interior stating that "[a]bout 150 policemen have been [in Brčko] since the beginning"(P2763); stated that his military department "was not engaged in this":T.34789.
Around eight Serbian policemen remained in town and were totally disorganised:D3073,para.29. In May 1992 there was chaos in Brčko, the JNA withdrew,	Confronted with evidence that Serb officials in Brčko asked for assistance from

Pero MARKOVIĆ	
Claim contradicted by other reliable evidence	
Claim JNA commander Pavle MILINKOVIĆ left Brčko in May 1992:T.34729-34730;D3072,para.20. In May 1992 there was chaos in Brčko, the JNA withdrew,	Contradiction MILINKOVIĆ issued a travel permit in Brčko on 8-Jul-1992:D1577. Confronted with evidence that Serb officials in Brčko asked for assistance from

the police was powerless, the civilian authorities dysfunctional, and paramilitaries controlled the town:T.34725-34727,34730-34732;D3072,paras.20,30-31.

SAO Semberija and Majeвица(D.RISTANIĆ:T.16711), accepted that War Presidency asked for assistance and Serb forces came to Brčko in response to this request:T.34734-T.34735.
War Presidency travel passes(P6173;P2874), Luka Camp release(P3026) and other documents were discussed with witness showing War Presidency's authority in Brčko, and War Presidency and JNA coordination with paramilitaries and perpetrators of crimes:T.34731-34733.

Other credibility/reliability issue

Stated in 1994 TV broadcast that Brčko is Serbian, will serve as a connection between Krajinas and motherland Serbia, and will remain Serbian:P6619.

Foča

Milorad KRNOJELAC

Other credibility/reliability issue

Witness's testimony was given in his own defence in Case No.IT-97-25, in which he was convicted.

Persistently evasive:e.g.D2716,pp.200,205-211,212-214,228-230,232,240-242,244-45,259-264,270-279,287,294-298,336-339,342-345,335-336,368-374,375-377,384,389-402,510-514,516,522-525,537-539,576,601-617,635-644,648,650-652.

Presiding judge expressed "mounting irritation" at the witness's attitude toward Prosecution and his responses under cross-examination:D2716,p.300. At one point, the presiding judge interrupted cross-examination to ask for a direct answer, and after receiving an indirect answer, remarked, "I think that's about the best we can get.":D2716,p.539.

Persistently and incredibly minimised own authority as prison warden, e.g. claimed was not "in charge" of providing food to detainees at KP Dom and his attempts to obtain food for the inmates out of "humanitarian" concern was "by no means[...]based on an obligation"(D2716,pp.357-359). Shown two letters with his signature addressed directly to the military command requesting food, including one requesting specific quantities "for a month's food requirements", acknowledged that he signed and sent the requests but maintained it was only on behalf of the head of the kitchen:D2716,pp.356-362.

Frequently claimed that he did not remember or was unaware of information, events, or circumstances, or that he was not present when they occurred:e.g.D2716,pp.92,147,160,237,278-279,339,349-350,353-356,370,376-377,381-386,395,398,411-412,501,508-509,545,552-554,561-562,565,579-581,588-589,606-614,657-658.

Admitted to signing numerous documents, the contents of which he claimed to have no real knowledge:e.g.D2716,pp.358-362,388-402,627-644.

Trivko PLJEVALJIĆ

Other credibility/reliability issue

Although claimed to have no knowledge of the pre-war organization or forming of Serb armed units(T.32333-32343), testified to detailed information about Muslim pre-war arming, organization, and activities:T.32291-32296.

Witness left Foča town before the start of the conflict, returning on approximately 12 April 1992, and was in Belgrade from 14 July 1992 until sometime in 1993(T.32285-32286,32324), yet much of his testimony related to events which occurred in his absence.

Radojica MLADENOVIC

Claim contradicted by other reliable evidence

Claim

Contradiction

IT-95-5/18-T

Confidential

<p>Serb municipality of Foča and its bodies were “absolutely not” formed pursuant to KARADŽIĆ’s instructions:T.36626.</p>	<p>Confronted with intercept of 6-Jan-1992 in which STANIĆ informed KARADŽIĆ that they were doing “everything as it is in the instructions”(P3337,p.2), witness stated this was “a matter of recommendation rather than instruction”:T.36629. Confronted with his own statement at 14-Feb-1992 SDS meeting in Sarajevo that “we did everything that the centre had requested us to do, and considering the instructions we received in this field when setting up the Serbian Assembly and Executive Committee”(P6264), admitted these bodies were founded pursuant to SDS Main Board instructions and that “perhaps” these instructions were signed by KARADŽIĆ:T.36627-36633. Back-tracked on re-examination to contend this was reference to KRAJIŠNIK’s recommendation of 11-Dec-1991:DI1183,T.36681.</p>
<p>Local authorities had limited control in Foča and the situation bordered on anarchy:D3314,paras.20,25.</p>	<p>Confronted with CS President STANIĆ’s statement that the CS led the takeover(P3476), witness responded evasively:T.36636. Confronted with 14-Apr-1992 OSTOJIĆ report from Foča on the takeover(P3338), and OSTOJIĆ’s statement that his task was to establish civilian authority in all parts of RS(P6265), witness contended that OSTOJIĆ “just happened” to be in Foča “because his mother lived there”:T.36641. Confronted with OSTOJIĆ’s statement that Foča was run by the CS(P6265,p.6), accepted that “perhaps some of the component affiliated with the army and the TO staff” was in authority:T.36642.</p>
<p>Partizan Hall perpetrators were processed and punished with involvement of both civilian and military authorities:D3314,para.49.</p>	<p>██████████ conceded that these individuals “could not have been punished”:T.36652. Confronted with KARADŽIĆ’s 1995 appointment of perpetrator STANKOVIĆ as commander of special police unit, evidencing failure to punish(P6267), stated that KARADŽIĆ would have acted on someone’s proposal:T.36653.</p>
<p>KP Dom was military prison and civilian authorities’ relationship with the facility was “minor”:D3314,para.48.</p>	<p>Confronted with evidence that KP Dom was set up as a detention centre pursuant to CS President STANIĆ’s order(P3341;P3342), denied knowledge:T.36660. Admitted, when confronted with document he personally signed(P3340), that he was involved in staffing KP Dom guard service:T.36661. Accepted, when confronted, that CS approval was required for appointment of KP Dom interrogators:P6268,T.36662. Denied CS was involved in decisions on detention and release despite contrary evidence:P5540;P5539;P5526,T.36662-36663.</p>

Mitar RAŠEVIĆ	
Claim contradicted by own statement	Contradiction
<p>All detainees at KP Dom had documents “issued by competent authorities who ordered their detention” stating grounds for detention that were always “concrete deeds”:D4307,para.43.</p>	<p>When challenged that the detainees were civilians, stated that didn’t know whether there were in fact legitimate grounds for their detention and that others “were supposed to know”(T.46777-46778) these grounds. Confronted with his own confirmation before the BiH state court that a CS certificate stating that a detainee was “captured in combat operations” was simply a “standard form, which would be used to everyone”(P6656,pp.5-6), stated that the CS or army issued such documents and that no one could be brought in or out of the prison without one:T.46777-46780.</p>
<p>Didn’t remember or believe that elderly people were detained at KP Dom and it was certainly not the case after mid-May 1992:D4307,para.43;T.46776-46777.</p>	<p>Confronted with his prior testimony relating to the release of certain men from KP Dom on 14-Jan-1993 by VRS MS order(P6656,p.7), admitted that one of those being released was elderly:T.46780-46781. Confronted with record of a 31-Aug-1992 release of “55 elderly, unfit Muslim males”(P6660), confirmed these were non-Serbs released from the KP Dom:T.46783.</p>
<p>Never made a distinction between POWs and convicts in relation to food distribution:D4307,para.20.</p>	<p>Confronted with <i>Krnjelac</i> TJ(para.442), describing unequal food distribution as between Serbs and non-Serbs, maintained there was no discrimination, but stated “I don’t know if somebody perhaps received more or less in a portion. I mean, there was always something like that going on”:T.46794-46795. Accepted that he personally asked the warden to distribute leftovers from Serbs to non-Serbs:T.46795.</p>
<p>Never witnessed the beatings or mistreatment of any detainees at KP Dom and no prisoner ever complained of mistreatment by the guards:D4307,para.25.</p>	<p>Prompted with a prisoner’s name, recounted an incident when he encountered military police beating a prisoner during an interrogation and he “coincidental[ly] intervene[ed] to save a man”:T.46796. Prompted with a failed escapee’s name, accepted that this prisoner had told him he had been beaten by military security, but maintained prisoner never told him of beatings by prison guards:T.46796-46797. Confirmed saw injured people in the isolation cells, and reluctantly confirmed, when confronted with his BiH court testimony, that detainees told him they were beaten by military officers:T.46804-46805;P6656,p.8.</p>
<p>He did not know if prisoners were hidden from the ICRC</p>	<p>Confronted with his ICTY statement that “prisoners were hidden from [the</p>

during visits:T.46801.	ICRC], that's true," stood by this statement, but maintained "the army came and took people away" during ICRC visits, not people "from the KP Dom":T.46802.
Claim contradicted by other reliable evidence	
Claim	Contradiction
KP Dom prisoners could not see outside of the prison complex, and it was "physically impossible" for the prisoners to see the rooms where interrogations took place:D4307,para.30.	Admitted when confronted with photos that prisoners on top floors could see outside KP Dom to the iron bridge over the Drina(P3353,p.5;P3569,p.4) and prisoners in Room 11 could see across to the administration building rooms in which—according to testimony—interrogations took place:P6657;P3569,pp.4-5;P6658;T.46789-46793.
Other credibility/reliability issue	
Convicted to seven year prison sentence in BiH court for his involvement in crimes at KP Dom, in judgement finding that treatment of non-Serbs at KP Dom amounted to a "gross and flagrant denial of fundamental rights", including right to life and right not to be subjected to torture and inhuman and degrading treatment:T.46765-46766.	
Persistently maintained that "nobody was ever killed" at KP Dom(D4307,paras.25,27,35;T.46785) despite contrary findings in <i>Krmjelac</i> Trial Judgement(paras.333-334,339) and witness's own BiH trial:T.46784-46788.	

Milutin VUJIĆIĆ

Claim contradicted by other reliable evidence	
Claim	Contradiction
While SDA members were invited to SDS founding rally, SDS members were not invited to SDA founding rally:D2767,para.3.	Confronted with video of Velibor OSTOJIĆ giving speech at SDA founding rally(P6078), stated that he never saw him in person:T.32114.
"Just before the war broke out," Serbian employees of Foča trans had a strike and the Republic-level special police intervened and beat up civilians:D2767,para.4.	Confronted with 11-Sep-1990 Foča SJB report on these events, conceded it was "possible" they happened in 1990 or 1991:T.32121.
Serbs only started to arm in mid-1992:D2767,para.21.	Confronted with CS President and war commander Miroslav STANIĆ's statement that he saw a Serb battalion inspection in June 1991, and that they "prepared the military organisation of the Serbian people a year before"(P6081), maintained army units were only set up in April 1992:T.32127-32128.
Muslim forces were fighting from mosques, which is why Serbs attacked mosques:D2767,paras.22,24,29.	Shown expert report showing the location of the razed Aladža mosque(P4070,pp.129-131), conceded there was no fighting in Foča at the time it was razed to the ground:T.32135-32136.
Muslims left Foča of their own free will, and those who	Confronted with 10-Oct-1992 report of TG Foča Commander KOVAČ stating

<p>wished to stay in their homes and villages were allowed to do so:D2767,paras.8,16,30,32;T.32142.</p>	<p>that Muslim women and children were ready for exchange(P6080), admitted that there were exchanges, but maintained this was a matter of choice:T.32134.</p>
<p>Other credibility/reliability issue</p>	
<p>Only guarded Partizan for “three or four nights, only during the night” in late April/early May, after which he was mobilized to the front line and doesn’t know what happened. Admitted he has “no clue” about other facilities where women were held:D2767,para.11;T.32131-32132,32134.</p>	

Hadžići

Vitomir BANDUKA

Claim contradicted by own statement	
<p>Claim</p> <p>CS decided to use Hadžići Sports Centre as “holding centre” in response to Muslims’ security complaints and for the protection of the people being accommodated there. These people came to the centre voluntarily:D2915.paras.54-56;T.33515.</p>	<p>Contradiction</p> <p>Confronted with testimony of witnesses BALIĆ(P161), MUSIĆ(P2403) and OKIĆ(P125), and SJB Commander GLAVAŠ(P2296,pp.19-20;T.11784) that Hadžići Sports Centre detainees were taken and held against their will, stated that “whether they were taken or whether they were persuaded to do that but in agreement. That is something that I really cannot answer now”:T.33512-33513. Confronted with previous testimony in <i>Krajšnik</i> in which accepted that Muslims were held against their will in the Sports Centre(P6110,p.3) continued to deny Muslims were held against their will, claiming his <i>Krajšnik</i> testimony was badly translated:T.33515-33516. Confronted with MANDIĆ 22-Oct-1992 letter stating that 90 Muslims were imprisoned in Hadžići Sports Centre(P1607,p.28), accepted this did not suggest people were being held voluntarily for their own protection, but speculated that they might be awaiting prosecution or transfer to Kula prison:T.33520-33521. Accepted that the security personnel had to give approval in order for anyone to leave:T.33514.</p>
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Serbs didn’t get weapons from the JNA before the war:T.33499.</p>	<p>Contradiction</p> <p>Confronted with JNA 2nd MD Commander KUKANJAC 20-Mar-1992 report showing that by 20-Mar-1992, 1,500 men who were not part of the JNA or the TO had been armed by either the JNA or the SDS in Hadžići Municipality(P979,pp.6-11), maintained denial:T.33502.</p>

Nevenko SAMUKOVIĆ

Claim contradicted by own statement	
<p>Claim</p> <p>Muslim population went to the collection centre, where they</p>	<p>Contradiction</p> <p>Confronted with Prosecution witness evidence that people were detained in the</p>

felt safer:D3062,para.18.	Hadžići Sports Centre against their will, accepted that “police brought in some people and took them from their houses”, claiming they “had their reasons”, but also that some police could have “abuse[d] their position and powers”:T.34613-34614.
Claim contradicted by other reliable evidence	
Claim	
CS did not receive any directions or instructions from anyone, not even from the central government:D3062,para.14. It was impossible for the Hadžići authorities to get in touch with the Presidency or Government in Pale:D3062,para.20.	<p>Contradiction</p> <p>Confronted with:</p> <ul style="list-style-type: none"> - Minutes of 18-May-1992 RS Government meeting, evidencing government awareness of situation in Hadžići(P2625). - Report on combat readiness of Serb municipality of Hadžići to SRK Command, 29-May-1992, evidencing request to Republican authorities for military personnel, which request was met(D317). - Minutes from 11-Jun-1992 RS Government meeting evidencing financial assistance being provided to Hadžići(P3087). - Minutes of 17-Jun-1992 RS Presidency meeting, evidencing KARADŽIĆ being briefed on the situation on the Hadžići front(P3064). -Hadžići municipality representative, signing on behalf of witness, acting on KARADŽIĆ's instructions of 19 July(P739) in making a housing inventory(P6167), <p>conceded that it was “possible that there was some communication” with the government, but he was “not sure”:T.34612.</p>
Other credibility/reliability issue	
By witness’s own account he stopped being politically active after police split, resigned in early May, was ill from May and “almost completely withdrew from political and social life” at that point(D3062,paras.10,11,15,16).	

Mladen TOLJ	
Claim contradicted by own statement	
Claim	
Muslims went to the Hadžići Sports Centre voluntarily in order to be protected from out-of-control groups:D3063,para.9.	Conceded on cross-examination that very few people went from the Hadžići SJB to the Sports Centre voluntarily:T.34636-34637.
The Hadžići Sports Centre was not a camp, but a space for temporary accommodation:D3063,para.9.	Conceded on cross-examination that in wartime, places of temporary accommodation and prisons were indistinguishable—they “boiled down to the

<p>Those Sports Centre detainees who had violated the law were transported to Kula prison:D3063,para.10.</p>	<p>same thing terminologically”:T.34642.</p>
<p>The records show the reason people were taken into custody in the Police Station and time spent in it:D3063,para.14.</p>	<p>Conceded on cross-examination that not all of the detainees who were transferred to Kula prison had broken the law: rather the order came that they could no longer be held at the Sports Centre so they were transferred to other institutions:T.34638.</p> <p>Conceded on cross-examination that detainees were held well beyond the legal limit without receiving a decision on detention in accordance with the law then in force:T.34635.</p>

Ilidža

Momčilo ČEKLIĆ

Claim contradicted by own statement	
<i>Claim</i>	<i>Contradiction</i>
Denied that Serb police in Ilidža were taking repressive measures against Muslims causing them to flee:T.35218.	Confronted with Ilidža SJB Report(P2308), stating that Muslims were detained and repressive measures were taken against them resulting in their flight, stated he “wasn’t up to date on the Ilidža police station reports”, “wasn’t privy” to police-generated information, and had only a “rough understanding of how the situation evolved in terms of any population movements”:T.35219.
“[A]bsolutely false” that Bosnian Serb forces repelled the attacks of 22 April 1992 and 14-May-1992 and conquered new territory in the course of the attacks:T.35215.	Confronted with Ilidža SJB Report(P2308), describing successful defence of these two attacks and the conquering of new territory and listing additional successful offensive operations in the area, claimed his earlier answer referred only to 22 April 1992 and did not contest the document’s contents:T.35216-35217.
Paramilitaries were not tolerated by the army, MUP, or municipal authorities and the municipality tried to have them removed:D3112,paras.45-46.	Confronted with 13-May-1992 intercept of Col. GAGOVIĆ, then JNA 4 th Corps Commander, and Legija, one of Arkan’s men, coordinating military operations in Ilidža(P5691) and asked if he was aware of this kind of coordination, stated, “No. First I hear of it”:T.35229. Confronted with 15-May-1992 intercept in which M.STANIŠIĆ approves of the reinforcement of the Ilidža forces with Arkanovci and Šešeljevci(P2229) and asked if he was aware of STANIŠIĆ’s approval of these men’s presence in Ilidža, stated, “I wasn’t privy to this information. I don’t know anything about it”:T.35230.

Slavko MIJANOVIĆ

Claim contradicted by own statement	
<i>Claim</i>	<i>Contradiction</i>
The authorities of Serbian municipality of Ilidža did not expel non-Serbs. They moved out of their own accord and in an unorganised manner:D2773,para.6.	Confronted with Ilidža SJB report(P2308) stating that SJB took repressive measures against Muslims resulting in their flight, initially avoided answering, then acknowledged he was unaware of these activities:T.32365-32366.

<p>Ilidža authorities maintained contact with RS authorities and organs but there were no instructions or orders issued by RS authorities to expel or carry out ethnic cleansing of non-Serbs:D2773,para.6.</p>	<p>Asked whether the Muslims of Gornji Kotorac moved out of Ilidža of their own accord, stated that he could not reach that part of the territory and could not speak to what happened to Muslims in parts of Ilidža that he did not go to:T.32389-32390.</p> <p>Agreed he had no contact with republic-level authorities during the war, had no detailed knowledge about contacts that other municipal authorities had with RS authorities, was unaware of the 15-Jun-1992 meeting between Ilidža officials and MLADIĆ reaching conclusions on the clearing of Serbian territory(P1478,pp.170-171), and was unaware that in July 1992, PRSTOJEVIĆ reported to the RS Assembly that the Serbs in Ilidža had been “driving the Muslims out of the territories where they had actually been a majority”:D92,p.66;T.32397-32399.</p>
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Soniboj ŠKILJEVIĆ

Claim contradicted by own statement	Contradiction
<p><i>Claim</i></p> <p>MANDIĆ informed witness of the visit of a high-level delegation to Kula prison just an hour or an hour and half before KARADŽIĆ's arrival:T.36780. MANDIĆ did not tell the witness that journalists would be coming:T.36818.</p> <p>Was never at the Kula prison compound between 6 April and 18-May-1992:T.36807.</p> <p>Kula prisoners under army's authority were POWs:D3331,para.7.</p>	<p>MANDIĆ told the witness approximately two or three days in advance that a delegation would be coming headed by the RS President and international community members and that a great number of journalists would come:P6277,pp.6-7.</p> <p>Was present at the Kula prison compound on 20 and 21-Apr-1992:T.36810.</p>
<p>Kula prisoners occasionally went to work on the orders of the military:D3331,para.6.</p>	<p>Confronted with his 2003 OTP statement that, “Theory and practice are two different things. My logic tells me bringing people from one area of another ethnic group is not a [POW]” and confirming that was happening in practice(P6277,p.5), now claimed that the only civilians at KP Dom were not detained, but were brought for “family reunification”, a claim that was further impeached below:T.36822-36823.</p>
<p>None of Kula prisoners complained about being mistreated while working or at the prison:D3331,para.7.</p>	<p>Confronted with his own prison records recording groups of Muslim prisoners being sent out virtually every day to work at military locations(P6280), acknowledged this:T.36936-36939.</p>
	<p>Confronted with his own prison records reflecting prisoner complaints of physical mistreatment at a military work site(P6281,pp.4-5), acknowledged that</p>

	he knew this had occurred, and explained that they sent different people to work there after this:T.36939-36940.
Claim contradicted by other reliable evidence	
Claim	
The letters in D3350 show that Kula helped civilians cross over and families reunite:D3331,para.47.	Confronted with a letter entitled “Reuniting Families”(D3350,p.10), could not identify who was being reunited with whom and eventually stated, “I know that the family went to Sarajevo. This document shows it all.”:T.36824-36825. Also acknowledged that some of these people were held at Kula for several months(T.36825-36826) and that these people were subject to “exchange”:T.36932-36933.
Kula prisoners under the army’s authority were POWs:D3331,para.7.	Confronted with his own prison records reflecting the detention and exchange of teenage girls and elderly men(P6281,pp.6-8; [REDACTED] asked whether he ever questioned whether this was about POWs or “just about getting Muslims and Croats out” answered ‘I did think along those lines’; admitted informing Minister of Justice about civilians at the prison but the Minister did not want to discuss it:T.36931-36932.
Kula prisoners occasionally went out to work on military orders; witness did not know what kind of labour they did:D3331,paras.6-7.	Documents attached to witness’s own statement show that he had detailed information about the kind of work prisoners did, including front line work under dangerous conditions:D3352,pp.6,9;P5987;T.36934-36936.
The same food was served to the prisoners, guards and KP Dom officials and prisoners ate in the dining room. None of the prisoners went hungry:D3331,para.8.	Confronted with an inspection report stating “Everyone eats in the facility dining room except Muslim prisoners whose food is brought to the rooms they inhabit”(P6283), claimed that they prepared different food for Muslims for religious reasons:T.36948.
“No single crime was committed in Kula, specifically”:T.36953.	Confronted with the Appeals Judgment in his own trial which notes that he himself argued that “detention conditions with respect to the provision of food and hygienic accommodation, were not satisfactory but argued that the army was responsible”(P6294,p.70), claimed this incorrect:T.36950-36951. Acknowledged that civilians were detained (see above). Appeals judgement in witness’s case concluded that Kula prison constituted an organized criminal system in which large numbers of non-Serb civilians were unlawfully detained and provided with inadequate food, hygienic facilities and medical care and subjected to forced labour resulting in injuries and deaths and the witness was undoubtedly aware of this:P6294,pp.44-46,61-78,84-93.

Other credibility/reliability issue

Acknowledged that either he or Dragan BULAJIĆ crossed out the words “10,000 civilians” and wrote “exactly 119 civilians” on associated exhibit D3343(an altered version of the 1994 document P1127) in preparation for the witness’s BiH trial. Confirmed that at the time he received this document at Kula prison it did not have these markings on it:T.36816-36818.

Ključ

Marko ADAMOVIĆ

Claim contradicted by other reliable evidence	
<i>Claim</i>	<i>Contradiction</i>
<p>Denied Serbs were in control of Ključ municipality on 27-May-1992:T.44479-44480.</p>	<p>Confronted with 23-Apr-1992 Ključ CS meeting minutes stating that Serbs controlled all positions in Ključ(P3438,pp.1-2), continued to claim that in mid-May 1992 the municipality was split between Muslims and Serbs:T.44481-44482. Refused to comment on with 8-May-1992 Ključ CS announcement(D1724) setting out details of the Serb takeover:T.44483.</p>
<p>Ključ "battalion was not engaged in combat in Ključ":T.44464-44465.</p>	<p>Confronted with military report that on 27-May-1992 the Ključ Battalion was ordered to mop up the town and surrounding settlements(P6543,p.3) claimed the report was false:T.44464.</p> <p>Further confronted with 28-May-1992 combat report written by the witness' commander detailing planned mop-up operations(P5406,p.2), witness denied knowledge of document:T.44484-44486.</p> <p>Further confronted with 30-May-1992 combat report stating that his battalion was conducting mop-up operations in the relevant area(P6544,p.2), witness continued to deny unit carried out mopping-up operations:T.44486-44489.</p>
<p>Not in Prhovo area in the days preceding and on the day of 1-Jun-1992 attack:T.44472-44477.</p>	<p>Confronted with his BiH State Court Trial Judgement which concluded that ADAMOVIĆ was present when soldiers mistreated the residents of Prhovo the day before the attack, maintained that he was not there, claiming he attended a CS meeting that day:T.44472-44473.</p> <p>Confronted with evidence of three additional witnesses who put him in Plamenica on 28 or 30-May-1992 and in Prhovo on 1-Jun-1992, continued to deny he was there:T.44474-44477.</p>
Other credibility/reliability issue	
<p>At the time of his <i>Karadžić</i> testimony, witness was awaiting judgement in BiH re-trial on charges relating to allegations of war crimes in Ključ, including killings in Prhovo and Velagići on or around 1-Jun-1992(T.44457-44458), therefore it was in his interest to lie about his role in these crimes.</p>	

Slobodan JURIŠIĆ

Claim contradicted by own statement	
<p>Claim</p> <p>Denied that the Kluč authorities acted on instructions from the top political leaders of the Serbian people:T.47062.</p>	<p>Contradiction</p> <p>Confronted with his BiH Court testimony that everything going on in Kluč until May 1992 was conducted “according to the regulations as we received them from the higher instance of the Serbian Republic of Bosnia-Herzegovina”, confirmed this was “fully correct”(T.47061), however then limited this to mobilisation:T.47061-47062.</p> <p>Confronted with minutes of 23-Dec-1991 SDS Municipal Board meeting at which KARADŽIĆ’s instructions were adopted and the CS established(P2592), claimed this was “grossly unfamiliar”:T.47073. Confronted with record of his attendance at this meeting, witness accepted he had attended, and that the Kluč CS was established pursuant to KARADŽIĆ’s instructions:T.47073-47075.</p> <p>Confronted with his BiH testimony that the CS made decisions about mobilisation, refused to confirm:T.47068-47070.</p>
<p>Denied Kluč CS made decisions about mobilisation:T.47068.</p>	<p>Contradiction</p> <p>Confronted with 1992 Kluč Prosecutor’s office logbook extract(P6671), accepted that criminal reports were filed against the Muslim side only:T.47083-47085. Confronted with 16-Feb-1993 1KK report that Serb military, police and locals were illegally appropriating Muslim property “in full view of those who are supposed to stop and prevent them”(D1738,p.2-3), continued to maintain that efforts were made to prevent looting of property:T.47090-47091.</p> <p>Confronted with 30-Jul-1992 Kluč War Presidency Decision(P3462) providing that property of those leaving must be exchanged or signed over to Kluč municipality, claimed that the permit was to enable citizens to be able to cross check-points and that records were required to preserve the property:T.47097-47098.</p>
<p>Denied non-Serbs had to sign statement that they were leaving the territory forever and handing over their property in order to get a permit to leave the Kluč municipality:T.47095.</p>	<p>Other credibility/reliability issue</p> <p>Suspect in an ongoing BiH investigation for committing crimes against humanity against the non-Serb population in Kluč, including the killings of civilians in Velagići, Pudín Han, and Prhovo in 1992 and the imprisonment of civilians at Manjača:D4363,para.2;T.47056-47057.</p>

Claimed “that there were no excesses in Ključ [...] There were very few killings, nobody was detained. So I think it was an example in the whole region in comparison to other towns”:T.47104.

Rajko KALABIĆ	
Claim contradicted by own statement	
Claim There were no inter-ethnic frictions in Ključ between the multi-party elections and 27-May-1992:D4169,para.5.	Contradiction Confronted with his September 1991 speech on the “unleashing of a genocidal fascist hysteria”(P3423,p.2), claimed that he wasn’t sure he used certain words quoted therein:T.44543-44544. Further confronted with his <i>Brdanin</i> testimony in which he confirmed these were his words(P6550,pp.1-2), stated that the symbols emerging at the time “did take one’s mind back to 1941”:T.44545-44547.
Couldn’t remember seeing Variant A/B at Sarajevo meeting in December 1991:T.44549	Confronted with his <i>Brdanin</i> testimony that he saw the instructions in Sarajevo and they were given to SDS representatives who brought them to their municipalities(P6550,pp.3-4), maintained couldn’t remember seeing document:T.44549-44551
Claim contradicted by other reliable evidence	
Claim KARADŽIĆ had no influence on officials or bodies in Ključ either before or after the war:D4169,para.15.	Contradiction Confronted with 23-Dec-1991 minutes(P2592) showing that Ključ SDS was informed of and adopted the mandatory instructions, including on CS formation, and that witness himself explained Variant A/B stages at meeting, ultimately accepted that the CS was established pursuant to the instructions:T.44553-44556.
Did not attend 14-Feb-1992 SDS meeting in the Holiday Inn where KARADŽIĆ activated stage two of Variant A/B:T.44556-44557, [REDACTED].	Confronted with Holiday Inn receipt for “R.KALABIĆ” for 14-Feb-1992(P6551,p.6), claimed that whenever he went to Sarajevo he would only stay at a private apartment:T.44557,T.44596.
“Nothing special” was noticed in Ključ until 27-May-1992(D4169,para.6), there was no significant army presence, and power wasn’t seized in Ključ:T.44565-44566.	Confronted with 6 th Brigade report listing all the military and police units that participated in taking over power in Ključ(P3663,p.5), denied there was a takeover:T.44567. Further confronted with 8-May-1992 Ključ CS announcement regarding increased presence of armed forces in the municipality(P3497), incredibly claimed that he “wasn’t aware of the fact that there was an increased presence of troops there, and this really wasn’t noticeable in Ključ.”:T.44569.

Ključ CS was not involved in military matters:D4169,para.9.	Confronted with 29-Jul-1992 report on Ključ CS War Presidency(P2643,p.3) stating “[a]ll major questions related to the army and police were resolved within the Crisis Staff of the Municipal Assembly” and describing “very successful cooperation between the Crisis Staff and the military organs in crushing armed resistance by Muslim extremists”, claimed that cooperation between the CS and the military existed only as regards assisting families of soldiers:T.44571.
Other credibility/reliability issue	

Jovo KEVAC	
Claim contradicted by own statement	
Claim At Biljani school, individuals and groups broke free of army and police control and killed a number of Muslims:D4268,para.9. After Biljani incident, an on-site investigation was conducted, perpetrators arrested and proceedings conducted against them:D4268,para.9.	Contradiction Admitted he did not know who was present at the school, who was guarding the prisoners and what orders they had:T.46230-46231.
Claim contradicted by other reliable evidence	
Claim Denied being battalion commander on 10-Jul-1992, date of killings at Biljani:T.46207.	Contradiction Omitted from his statement that he was a VRS company commander and battalion commander during 1992:T.46202-46203;P6620. Confronted with Sanica SJB official note dated 10-Jul-1992(P3366), referring to witness as battalion commander and noting his “mopping up” operations in Biljani, maintained he was not battalion commander at this time:T.46211. Confronted with witness testimony in other cases, admitted speaking with SAMARDŽIJA on 10-Jul-1992, yet denied he was informed of what was happening in Biljani, and claimed he had no involvement in the killings:T.46217;T.46222-46225.
No SDS/military policy of ethnic cleansing or forcible transfer in Ključ:D4268,para.13.	When confronted with CS President BANJAC’s statement that the areas “be ethnically cleansed”(P6552,p.2), stated this was “a warning and a suggestion of different ways the situation should be solved”:T.46244.

Novo Sarajevo

Momir GARIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>Not present at Novo Sarajevo CS meetings in Lukavica and Pilava:T.29650-29652.</p>	<p>Confronted with his prior OTP statement that he was present at CS meetings in Lukavica and Pilava(P5965.p.4), continued to deny his attendance, claimed not to recall his conversation with OTP:T.29649-29652.</p> <p>Confronted with minutes of 29-Jan-1992 CS meeting in Lukavica identifying “Momo GARIĆ” as one of the participants(P2583), stated “[a]nd then there’s myself”:T.29653. Confronted with this admission by Judge Kwon, avoided the issue, noting that his name is Momir and that “Momo isn’t the same as Momir”:T.29653-29655(see below, re: nickname “Momo”).</p> <p>Confronted with his prior OTP statement that MILINKOVIĆ “was one of the commanders of MUP”(P5965,p.11), responded “[w]ell, perhaps I said that, but I don’t remember.”:T.29693.</p> <p>Confronted with the several references in his initial Defence statement that he was a VRS battalion commander, claimed that the Defence never asked whether he was a commander during their initial conversation:T.29642-29645.</p> <p>Confronted with a 30-May-1992 MLADIĆ notebook entry mentioning “reserve Captain Momir GARIĆ, Commander of the Novo Sarajevo Light Brigade ([approximately] 730 men)”(P1478,p.31), admitted to being at this meeting but continued to deny that he was a VRS commander and was unable to explain why MLADIĆ referred to him as such:T.29714-29717.</p>
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Was not called “Momo”:T.29696.</p>	<p>Admitted that “Momo” is the nickname used for Momir(T.29655), but confronted with numerous intercepts involving “Momo” GARIĆ claimed his nickname was not “Momo”(T.29696) despite: Defence <i>65ter</i> witness list identified him as “Momo”; intercepts with “Momo” GARIĆ relate to matters he admitted were within his area of operation; facts and circumstances discussed in</p>

<p>Was not a TO commander, there was no TO operation in the Vraca area on 21-Apr-1992, and never had a conversation with KRAJIŠNIK or PRSTOJEVIĆ concerning TO activities:T.29655,T.29663,T.29665,T.29683,T.29691.</p>	<p>an intercept between “Momo” GARIĆ and “Neso” GARIĆ(P5963) parallel those described in his statement; and “Neso” is a nickname for Nenad, the witness’s brother’s name:T.29667-29702,T.29713-29741.</p> <p>Confronted with multiple 21-Apr-1992 intercepts concerning “Momo” GARIĆ and a TO operation ongoing in Vraca, including GARIĆ conversations with KRAJIŠNIK and PRSTOJEVIĆ(P5703;D1202,p.4;P5705;P5957;P5958;P5959) and PRSTOJEVIĆ’s testimony that one of these conversations was with the witness, who was the TO commander, concerning a TO operation that day in Vraca(PRSTOJEVIĆ:T.13688-13690), denied or otherwise could not recall having these conversations and continued to deny that a TO operation occurred on 21-Apr in Vraca, where he admitted he and his TO operated:T.29669-29701.</p>
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Milorad KATIĆ

<p>Claim contradicted by own statement</p> <p>Claim</p>	
<p>Bosnian Muslims could have fired shots from the “Red Building” into the area in front of the Holiday Inn to cause incidents:D2651,para.16.</p> <p>Armed soldiers were located in the upper floors of the Metaljka building:T.31406,31409; <i>see also</i> T.31417(Judge Kwon agreeing witness had confirmed this fact).</p> <p>Snipers in Metaljka building could engage targets in front of the Holiday Inn with or without telescopic sights:T.31406-31407.</p>	<p>Contradiction</p> <p>Conceded that an ABiH soldier could not shoot at the S curve in front of the Holiday Inn building from the “Red Building” as their line of sight would have been obstructed by tall buildings:T.31411.</p> <p>Backtracked in re-examination, suggesting that he “did not claim then that they could have climbed the roof or these higher floors” because “I was never as a soldier on this position” and “did not see them”:T.31418; <i>see also</i> T.31419-31421 (Judge Kwon challenging the witness on this discrepancy).</p> <p>Pressed on this in re-examination (and following KARADŽIĆ’s leading explanation of a photograph:T.31423), backtracked and claimed the S curve in front of the Holiday Inn could not be hit from Metaljka:T.31424.</p>

Branko RADAN

<p>Claim contradicted by other reliable evidence</p> <p>Claim</p>	
<p>Unlike the Muslims and Croats, the Serbs were not preparing for war:D.2549,para.7. Novo Sarajevo CS was not formed until mid-March 1992:T.31093.</p>	<p>Contradiction</p> <p>Confronted with Variant A/B(P5), NEŠKOVIĆ’s testimony on Variant A/B’s distribution(P2568 p.70), and 23-Dec-1991 minutes of Novo Sarajevo CS(P2575), claimed he was unaware of the formation and taskings of the CS:T.31104-31108.</p>

BATKO and eight other Serbs committed crimes against non-Serbs in Grbavica, but the local police knew of these crimes and succeeded in removing them from Grbavica:D.2549,para.13.	Conceded that BATKO was in Novo Sarajevo until at least September 1992, that there was a significant army and police presence in Novo Sarajevo, and that given that police were aware of BATKO's crimes in May 1992(P6017) "something could have been done earlier" to stop him. Also conceded one of BATKO's group arrested for shooting at the witness's car but released a few days later:T.31109-31113.
The situation with crime in Novo Sarajevo improved over time:D2549,para.13.	Confronted with minutes of a November 1992 meeting between SRK commanders and municipality presidents describing widespread crimes in Novo Sarajevo(P5065), suggested that it "wasn't massive", but then contradicted himself and noted "I accept all the rest [...] except for this formulation, that it was genocide":T.31121-31124.
Denied that hundreds of Muslims were expelled from Grbavica on 30-Sep-1992:T.31130.	Confronted with UNCIWPOL report concerning the expulsion of Muslims from Grbavica on 30-Sep-1992(P1266), conceded that he had heard about the expulsions at the time and had contacted "official sources" for more information who informed him that the whole thing was "self-organized":T.31131-31133.

Dragan SOJIC

Claim contradicted by own statement

Claim

Denied that the SDS CS in Novo Sarajevo was created on instructions from SDS Main Board:T.31752.

Contradiction

Confronted with 23-Dec-1991 minutes of the Novo Sarajevo CS making clear that the CS was established on such instructions(P2575), continued to deny this, although acknowledged his presence at the meeting:T.31752-31755.

Further confronted with 27-Jan-1992 minutes of Grbavica SDS local board meeting attended by the witness, stating that CS "is formed according to SDS Main Board guidelines" (P6066), continued to deny this was the case without explanation:T.31755-31756.

Claim contradicted by other reliable evidence

Claim

The unit led by Slavko ALEKSIĆ that the witness joined in June 1992 was not a volunteer or paramilitary group, but a regular unit, that "wasn't special" and in which "there wasn't a single volunteer":T.31737-31738,T.31760. Denied that

Contradiction

Unaware that at the beginning of the war, ALEKSIĆ led a group of volunteers known as the "Novo Sarajevo Chetnik Detachment" (P5035):T.31760.

Confronted with 16-Dec-1993 request for weapons and ammunition type-signed

<p>ALEKSIĆ referred to himself as a “Vojvoda”:T.31761.</p>	<p>“Commander Vojvoda Slavko ALEKSIĆ” and stamped “Sarajevo local commune board of the Serbian Radical Party”(P5931) and asked to confirm that it was not typical of a VRS Commander to sign and stamp a VRS document in this manner, responded “I have no comment.”:T.31760-31762.</p>
<p>Other credibility/reliability issue</p>	
<p>From April 1992 until mid-December 1993, did not personally participate in the work of CS or any other municipal organs in Novo Sarajevo:T.31749-31751.</p>	
<p>Disputed that Slavko ALEKSIĆ’s long hair and beard depicted a typical Chetnik appearance, claiming that he resembled Moses:T.31760-31761.</p>	

Pale

Zdravko ČVORO

Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Muslims left Pale voluntarily and of their own free will:D2530,paras.5-6;T.30939.</p>	<p>Confronted with his own statement at an 18-Jun-1992 Pale Municipal Assembly meeting objecting to the SJB's activities "because it had participated in the attempt to organise the Muslims and to move them out"(D31,p.4), denied knowledge of any such police activities:T.30939.</p> <p>Despite denying knowledge of whether Muslims were expelled from other RS municipalities(T.30941-30942), accepted that a large group of beaten Muslim civilians passed through Pale in May 1992 and were escorted out of Pale by the police:T.30945-30946.</p> <p>Confronted with fact that notorious paramilitaries were put up at the Panorama Hotel in Pale(P733,para.39-40;P1107,p.3), denied knowledge and said he had no authority over the army or police:T.30947-30948.</p> <p>Confronted with fact that Presidency member Nikola KOLJEVIĆ told Muslims that they were not wanted and should not stay in Pale(P733,para.38), denied knowledge:T.30949.</p> <p>Confronted with his own letter to PLAVŠIĆ on 7-Jul-1992 stating "there was forced and willful moving out of the Muslim population"(P6034), maintained there were "misinterpretations" by both Muslims and Serbs of the Assembly decision, causing Muslims to believe they had to leave, and "individual" Serbs to apply pressure on them to do so:T.30964-30965.</p> <p>Confronted with 6-Jul-1992 Pale executive committee decision, signed by him personally, stating that non-Serbs must not be allowed to leave the municipality until a list of property is made and property taken over by the municipal authorities(P738), maintained that this was to protect movable and immovable assets:T.30951.</p>
<p>Both Serbs and non-Serbs signed over their property when leaving the municipality in order to protect it:D2530,paras.7,15. Non-Serbs were not required to do so in order to leave the municipality:T.30950.</p>	

	Confronted with Government instructions on war booty(P5502;P6031), accepted 6-Jul-1992 decision was based on these:T.30954.
Tomislav HRŠUM	
Claim contradicted by own statement	
Claim	Contradiction
Has never been an SDS member:T.32918.	Confronted with fact he was an SDS candidate in 2012 in Rogatica(P6088), admitted he was politically active:T.32918.
Claim contradicted by other reliable evidence	
Claim	Contradiction
On 17-Mar-1992, Muslim policemen from Pale SJB requested to be relieved of duty:D2850,para.13;T.32922.	Confronted with evidence of CS Pale Municipality decision to remove Muslim policemen from duty(P6089) and an SJB Pale record stating that in mid-March 1992, non-Serb policemen were disarmed and removed from duty(P6090), maintained that the Muslim policemen requested approval to stop working and voluntarily handed over their weapons:T.32923-32924,32926.
Muslims voluntarily left Pale municipality and SJB was unaware that Muslims were being forcibly moved out:D2850,para.22;T.32919-32920,32927.	Confronted with CS President's complaint to RS Presidency and War Commissioner that Muslims were being forcibly moved out(P6034) and CS President's complaint before 18-Jun-1992 Pale Municipal Assembly about SJB's activities in organising the Muslims and moving them out of the municipality(D31), maintained SJB's only involvement was to provide security to Pale's Muslims:T.32928,32969.
In mid-April the RS Presidency established the TO which was mobilised at a later date:D2850,para.15.	Confronted with Ministry of National Defence 16-Apr-1992 decision mobilising TO on the entire territory of Serbian BiH(P2412), accepted that "relatively speaking", the TO was operating in Pale by mid-April 1992, but denied they took part in military activity in Sarajevo:T.32946-32947. Confronted with 8-Apr-1992 2 nd Military District Operation Report, stating that Pale TO opened fire on the old part of Sarajevo(P6094,p.2), accepted on the basis of the report that the Pale TO were involved in the operations in Sarajevo:T.32948.
Other credibility/reliability issue	
Despite being in a position to describe the clothes the Bratunac 400 were wearing when they arrived in Pale, refused to confirm whether they had been mistreated at that point:T.32941.	

Jovan ŠARAC	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>KARADŽIĆ had no control over the army or parts of the Government: D4368, para.9.</p>	<p>Witness was not a soldier, never attended military or Supreme Command meetings, nor did he have access to military directives or orders: T.47159-47160. Confronted with GVERO's 1992 statement that army was subordinated to the President (D422, p.63), accepted KARADŽIĆ was Supreme Commander, but claimed he was not "responsible in the operational sense": T.47162. Confronted with supplement to Directive 6 issued by KARADŽIĆ on 12-Dec-1993 (P4925) issuing specific tasking to VRS, and the implementation orders issued by MLADIĆ (P3052) and the SRK command (P1196), accepted that KARADŽIĆ had supreme control over the army: T47163-47164. Confronted with statement by KARADŽIĆ at the 34th Assembly session that "...the government is mine. I am responsible for its functioning" (P1379, p.255), claimed this could only be a show for the public: T.47169.</p>
Other credibility/reliability issue	
<p>Made extraordinary assertion that, until attack on JNA convoy in Dobrovoljačka Street in Sarajevo on 2/3 May, "One could say that going to the positions was seen rather as some kind of fun, or an excursion, than going to war", and that only after this date did people realise "the time of jokes was over": D4368, para.22.</p> <p>Accepted that when he asserted in D4368, paras.50-60 that certain adjudicated facts were untrue, he meant that they were untrue according to the information he had "at his disposal": T.47156-47158.</p>	

Prijedor

Slavko BUDIMIR	
<i>Contradiction</i>	
<p>Claim contradicted by other reliable evidence</p> <p><i>Claim</i></p> <p>Prijedor CS had no influence or authority over the army, police or other defence structures:D4463,pp.70-71.</p>	<p>Confronted with:</p> <ul style="list-style-type: none"> -CS decision stating CS established to coordinate defence of municipality(P3536,p.2/<i>Stakić</i>S180,p.51); -17-Jun-1992 CS order to Prijedor SJB and Regional Command to set up unified intervention platoon(P3536,p.42/<i>Stakić</i>S180,p.42); -29-May-1992 CS Conclusion ordering Serbian TO be incorporated into army structure of Region and placed under its command(P3536,pp.80-81/<i>Stakić</i>S180,p.69); and -CS order putting TO Commander under regional command of the army(P3536,p.49/<i>Stakić</i>S180,p.54), insisted CS had no legal authority, characterised these “orders” as a “requests” to army and police and otherwise had no explanation:D4463,pp.71-74. <p>Under close questioning regarding:</p> <ul style="list-style-type: none"> -the responsibilities of the Prijedor CS, of which BUDIMIR was a member, to “keep abreast of all aspects of the situation in the municipality”(D4463,p.137;P3536,p.4/<i>Stakić</i>S180(Issue1)); -awareness of DRLJAČA’s order to set up Omarska(P2640/<i>Stakić</i>S107); -CSB Banja Luka report indicating CS set up camps(D470,p.2/<i>Stakić</i>S152); -ARK confirmation of CS decision prohibiting release of persons from camps(D4468,p.11/<i>Stakić</i>S250); and -video of STAKIĆ stating civilian authorities created these camps(D4463,pp.152-153/<i>Stakić</i>S187-1), continued to deflect his responsibility and awareness of the camps and claimed not to recall whether he attended CS meetings or discussed these matters:D4463,pp.137-153,219,297-298. <p>Confronted with 5-May-1992 National Defence Council Minutes(P3535/<i>Stakić</i>S28), listing JAVORIĆ (TO Staff Commander), KURUZOVIĆ (TO commander), ARSIĆ (43rd Motorised Brigade) and</p>
<p>Never discussed issues concerning Omarska, Keraterm or Trnopolje camps in any CS meeting he attended:D4463,pp136-140,294.</p>	<p>Members of military were not members of the Municipal Assembly’s National Defence Council:D4463,pp.259-262.</p>

	ZELJAJA (ARSIC's assistant:D4463,p.48), as "members of the Council" and listing separately 6 other people who merely "attended" the meeting, persisted they were not members under the law as written:D4463,pp.262-263.
The National Defence Council never functioned during the time BUDIMIR was Secretary of the Secretariat:D4463,p.263.	Shown two separate sets of National Defence Council meeting minutes(P3535-5-May-1992/ <i>Stakic</i> S28; P3529-15-May-1992/ <i>Stakic</i> S60), explained that technically he did not consider the Council as "functioning" because the Municipal Assembly did not formally appoint the Council and legalise its operation, but agreed he could not "argue with the facts and evidence produced" in court:D4463,pp.263-264.
Never spoke to foreign journalists:D4463,pp.334-337.	Shown two articles by foreign journalists with multiple quotes from BUDIMIR, maintained his denials:D4463,pp.334-337. When Judge Schomburg raised the possibility of perjury charges under Rule 91, fell back on a lack of memory or awareness that he spoke with journalists, suggested the journalists had spoken to a colleague, or called the journalists' quotes "fabrications":D4463,pp.342-350.
Other credibility/reliability issue	
Judge Schomburg repeatedly chastised BUDIMIR for circumventing questions:D4463,pp.28,71,73,76,140,143,206.	
Overall, was extremely evasive, claimed lack of memory and relied on legalistic formulations even when directed by Chamber to describe the <i>de facto</i> reality (see above).	

Vladimir GLAMOČIĆ

Claim contradicted by other reliable evidence	Contradiction
Claim	
Denied attending 24-Aug-1992 meeting in ŽUPLJANIN's Banja Luka office:T.47238.	Confronted with statements from KOMLJENOVIC(P3768,para.4;T.20914) and KREJIĆ(P3760,pp.21-23) that he was present at the meeting, changed his testimony to a lack of memory as to whether he attended:T.47238-47239.
There was no cover-up of the Koričanske Stijene massacre:D4379,para.29.	Confronted with the fact that the victims' burial site was not revealed until 2009, when perpetrator admitted guilt and disclosed the site, had no explanation:T.47249-47250.

Momčilo GRUBAN

Claim contradicted by own statement	Contradiction
Claim	
Non-Serb minorities in Serb-dominated territory in Prijedor	During cross-examination, limited this statement to just his local commune—in

<p>municipality enjoyed the protection of the authorities and most still live there:D4388,para.2.</p> <p>Conditions were as humane as possible in wartime circumstances; guards ate same food as detainees:D4388,para.8;T.47490.</p> <p>No reserve police members ill-treated detainees during his shift:T.47457;D4388,para.8.</p>	<p>which there were 5 Croats and no Muslims(P6684,pp.3-4)—and surrounding communes:T.47449.</p> <p>Conceded inspectors given steak meals. Maintained guards ate same food as detainees but admitted “perhaps” guards got larger rations:T.47491.</p>
<p>Detainees had access to water, toilets and showers and could freshen up and get their rooms cleaned:D4388,paras.8,17,23.</p>	<p>Confronted with the BiH Court finding that during shifts commanded by GRUBAN, guards given lists of people to be called out and taken away from the camp and some were killed, downplayed his responsibility, stating he had no right to question where people were taken, and claimed he did not know people were killed when taken away. Confronted with BiH Court evidence that when he prevented a detainee from being taken away, GRUBAN had told others he “saved” him from certain death, incongruously claimed he helped many detainees “survive all these things” while continuing to deny any knowledge of killings:T.47457-47462.</p> <p>Admitted, “in view of the large number of detainees”, there were “perhaps not enough” water facilities; stated epidemiologists came to chlorinize the toilets to avoid infection or contagion, “but that was two months after the establishment” of the camp, and admitted “Of course the rooms were overcrowded [...] but that was the situation and nothing could be changed”:T.47490.</p>
<p>Other credibility/reliability issue</p> <p>Convicted in BiH in 2008 of crimes against humanity for crimes committed in Omarska and sentenced to 7 years’ imprisonment. BiH Court rejected claim he had no command position, a claim repeated in his testimony(T.47456-47457), finding he was one of three guard-shift commanders:T.47440-47442,47456.</p>	

Dušan JANKOVIĆ

<p>Claim contradicted by own statement</p>	
<p>Claim</p> <p>After massacre at Koričanske Stijene, it was impossible to arrest intervention platoon members:T.47303.</p>	<p>Contradiction</p> <p>Confirmed previous testimony that the intervention platoon fled to Mt. Kozara, but later returned to the Koričanske Stijene execution site to clear up bodies from the terrain:T.47346-47347. Asked whether it was improper to ask suspected perpetrators to clean up their own crime scene, avoided question, denying knowledge of their assignment. Maintained it was impossible to arrest the 40 platoon members, despite the platoon having obeyed the order to return</p>

	to the crime scene, and having a 1500-strong police force:T.47347-47348.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Was not Prijedor police station commander in 1992; police station ceased to operate in September 1991 for the duration of the war; job only involved logistics:T.47280-47281.	Confronted with numerous contemporaneous documents establishing Prijedor police station was operational in 1992 and JANKOVIĆ was Commander. In an attempt to minimize his role, continually evaded direct response to persistent questioning by the Chamber and prosecutor regarding his role as commander and failed to adequately address the plain language in documents detailing the activities of a functioning Prijedor police station:P6674:T.47314-47319; P6675:T.47320-47324;P6676:T.47326-47328;P6677:T.47329-47332;P6678:T.47332-47334;P6679:T.47335. KARADŽIĆ defence lawyers' summary of JANKOVIĆ's expected evidence stated he was Prijedor police chief:T.47337-47338.
There was communication between the Prijedor SJB and Banja Luka CSB only when electricity was available:T.47263.	Confronted with logbook of dispatches received by Prijedor SJB for 1992, establishing almost daily contact with Banja Luka CSB during May and throughout 1992(P2744), admitted they "probably" turned on a power generator when they needed to receive dispatches:T.47340-47341.
Muslim or Croat villages that didn't engage in fighting were not destroyed during the war:T.47297-47298.	Confronted with October 1992 Banja Luka report detailing villages fully and partially destroyed due to armed conflict(P3852), admitted he had not been to any of the villages he claimed were untouched and based his testimony on "stories" that circulated:T.47349-47350.
Other credibility/reliability issue	
In February 2013, convicted in BiH Court of massacre committed at Koričanske Stijene; serving a 21-year prison sentence:T.47306. BiH Court rejected JANKOVIĆ's claims, repeated during his <i>Karadžić</i> testimony, that he was not Prijedor police station commander and was not present in the Koričanske Stijene area when the massacre occurred:T.47306-47307.	

Jevto JANKOVIĆ	
Claim contradicted by own statement	Contradiction
Claim	Contradiction
He was never influenced by anyone regarding the investigations he conducted:D4235,para.7.	Previously told OTP it was impossible to fulfil his obligations to investigate and punish crimes by Serbs against Muslim and Croats:T.45976. Then inconsistently stated he was jeopardised by his legal decisions as judge, but no one exerted pressure against him. He then surmised that foreign intelligence

<p>Was abused for 10 hours by OTP investigator from Pakistan and pressured to give a false statement:D4235,para.15;T.45981-45983.</p>	<p>services were pressuring him:T.45978-45979.</p> <p>Asked to review the transcript of the entire interview and point out those times when he was abused or pressured(T.45982-45984), admitted the transcript did not reflect abuse:T.46003-46004. Denigrated investigator because of his nationality and accused him of colluding with Serb criminals (“I mean, we don’t want a man from Pakistan coming in, rather have someone from Norway. [...] I mean, I’m not saying they’re not a good people in general.”):T.45982; <i>see also</i> T.46001.</p>
<p>Was at the Koričanske Stijene massacre scene for 4 hours:T.45990,46005-46006.</p>	<p>Initially testified he was at the crime scene for 2 hours, but when KARADŽIĆ interceded with a comment “Four hours”, then agreed, but testified he was there “between 1500 and 1700 hours,” or 2 hours(T.45990; <i>see also</i> T.46005—both 2 and 4 hours stated). Confronted with prior statement that he was only at the massacre scene for 2 hours during a storm, then altered his time estimate of 4 hours to include time spent in town, away from the scene:T.46006.</p>
<p>Became an investigating judge in 1977, graduated from law school 5 to 6 years before that, worked as an investigating judge until dismissed by OHR in 2002, and had been working in the judiciary for 40 years:T.45955,45960.</p>	<p>When confronted with 6-Jul-1992 letter from Banja Luka public prosecutor(P6525), stating JANKOVIĆ graduated from law school in 1983, passed the bar in 1985 and had been a judge since 1989 (<i>i.e.</i>, 12, rather than 24 years), admitted this information is true, claiming it was a long time ago:T.45962-45963.</p>
<p>Other credibility/reliability issue</p>	
<p>Frequently rambled and dissembled in court, requiring the Chamber to cut off his non-responsive answers, refocus him, ask that the question be repeated and direct that he answer the question:T.45961,45983-45984,45998,46004,46012,46017,46024.</p>	
<p>Complained that his written statement(D4235) had been compiled by someone who was not a lawyer and in response to a question by the Chamber, testified he did not agree with some of the statements in it:T.45986-45987.</p>	

Miroslav KVOČKA

Claim contradicted by own statement	Contradiction
<p>He “personally never saw a single murder at the Omarska SJC”, although saw several dead bodies:D4219,para.58.</p>	<p>Saw a man drive to camp entrance and shoot at detainees killing at least two of them:D4219,paras.59-60;T.45594-45595.</p>
<p>Saw only 50 men lying prostrate on runway, or “pista”:D4219,para.42.</p>	<p>Confronted with prior statements, recalled that as many as 400 men on the “pista”:T.45606-45607.</p>
<p>In addition to specific instances discussed in his statement,</p>	<p>When questioned by the Chamber, admitted that evidence adduced at his trial</p>

had the impression only 10 people were beaten out of the 2,500 people detained in Omarska:T.45655-45656.	established more than 10 were beaten:T.45655-45656.
Other credibility/reliability issue	
Convicted of crimes against humanity (persecutions) and violations of laws or customs of war (murder, torture) and sentenced to 7 years in prison:T.45577-45578.	

KW-609	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Did not see dead bodies in Omarska, except on one occasion:T.46127-46128.	Confronted with the fact that he worked at the camp for 3 months, 8-10 hours per day, and that bodies were seen lying around the camp on a regular basis, responded evasively, tried to limit his observations to the one occasion he saw a dead body, and finally claimed he could not remember:T.46128.

Boško MANDIĆ	
Claim contradicted by own statement	
Claim	Contradiction
It was generally known that police and prosecutors investigated and filed reports regarding individual murders:D4229,para.15.	Could only name a single case, and was not sure if perpetrator had been prosecuted. Asked for the basis of his statement that investigations were done, stated he “assumed” police and prosecutors did what they were supposed to do and he “supposed” they documented things and caught perpetrators:T.45780-45782.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Civilians kept at Trnopolje for own safety; people not detained but free to come and go at will:T.45764;D4229,para.10.	Confronted with Executive Committee conclusion forbidding the individual release of persons from Trnopolje(P2915,p.3), admitted people were detained, but claimed this was “temporary” due to danger posed by mop-up operations, landmines in houses and armed Muslims:T.45765-45766.
People who participated in combat or were captured with weapons were taken to Omarska where an investigation was conducted:D4229,paras.12,20;T.45766-45767.	Challenged, agreed “there were those who didn’t have weapons”, said he “assumed” people had undergone “triage”, but that he wasn’t there and didn’t know. Confronted with Prijedor SJB report acknowledging there were people in Omarska of no security interest and no proof they had participated in armed rebellion(D470,p.30), stated “if that’s what they wrote, then that’s the way it

<p>Persons of any nationality could remain in leadership positions provided they were loyal to the state:D4229,para.28;T.45768.</p> <p>During the first few months, Prijedor authorities did not have contact with authorities in Pale:D4229,para.22.</p>	<p>was.”:T.45766-45767.</p> <p>Confronted with ARK CS order requiring certain posts considered to be important only be held by ethnic Serbs(P2740), and Prijedor SJB report indicating that order was implemented within the SJB(P2637), accepted “[o]bviously” the order had been forwarded by the Prijedor CS and implemented by the Prijedor SJB:T.45767-45770.</p> <p>Asked for a time-frame when no contact occurred, and confronted with contemporaneous documents establishing Prijedor CS contact with Pale government(P3919:20-May-1992 RS Presidency decision on general public mobilisation;P3537:Record of CS discussing and implementing this decision on 22-May-1992;P6589:18-May-1992 Prijedor Municipal Board minutes where MIŠKOVIĆ briefed SDS on 12 May Assembly), admitted there was contact, but evasively claimed he did not personally receive documents and didn’t remember them being discussed:T.45770-45774. Further challenged, eventually admitted when reporting on the 12 May Assembly MIŠKOVIĆ “certainly touched upon some strategic objectives”:T.45774-45775.</p>
<p>Villages with “loyal” Muslims such as Cela were not attacked:T.45812.</p>	<p>Confronted with October 1992 Banja Luka SMB report, listing Cela as a partially destroyed village(P3852), claimed Serb population looted and destroyed houses after Muslims had left, despite document stating that “[t]his destruction saw the beginning of mass exodus” of non-Serbs:T.45814-45817.</p>

Željko MEJAKIĆ

Claim contradicted by own statement	<i>Contradiction</i>
<p><i>Claim</i></p> <p>There was no plan, “attitude”, design or agreement to maltreat prisoners; primarily, members of paramilitary formations or criminal groups were responsible, and very rarely, security service members:D4138,para.20;T.44216-44217.</p>	<p>Confirmed arrival of Banja Luka MUP Special Unit, sent by DRLJAČA, and admitted this unit maltreated the prisoners, causing “immense problems”. Despite having received many previous complaints about this unit’s conduct, DRLJAČA sent the unit to Omarska anyway. MEJAKIĆ sent daily reports to DRLJAČA about the crimes committed by this unit at Omarska, most of which were ignored:D4138,paras.15,19;D4139;T.44218-44220,44231.</p>
<p>Admitted giving an interview to Monica GRAS, mentioning the deaths of only two persons from natural causes in the camp; denied participating in a cover-up to avoid</p>	<p>Confronted with previous testimony admitting he had not told the truth to Monica GRAS about killings at the camp; admitting that an “official version” of the facts concerning Omarska had been given by DRLJAČA and by a</p>

responsibility for killings at Omarska:T.44284-44288.	commission's official report; and no one dared change anything about that version when talking to the media:T.44292-44294. Claimed he had not properly understood the prosecutor's previous questions, then admitted he had followed orders to provide an official version of events paraphrasing information from the CSB Banja Luka commission report and that DRLJAČA and other SJB officials also gave "official versions" to the media:T.44294-44295.
Denied being issued an ID card with a false name by the RS government; the transcript of his previous testimony in the BiH Court, which states he was issued such an ID card, does not accurately reflect his testimony:T.44290-44291.	In previous testimony, stated: "I simply sat on a bus and with a falsified ID card. It was not a falsified ID card with respect to the authenticity and the stamp. I was issued by Ministry of the Interior card to a false name, and I went to Serbia and I stayed there until surrendering to the Tribunal.":T.44291.
Claim contradicted by other reliable evidence	
Claim	
When an ARK delegation led by ŽUPLJANIN came to Omarska in mid-July 1992 and met with DRLJAČA, ŽUPLJANIN angrily told DRLJAČA to dismantle the "collection centre" immediately:D4138, para.25; T.44264-44265.	Contradiction Confronted with ŽUPLJANIN report to the RS MUP and Mićo STANIŠIĆ, written 5 days after the ARK delegation visit, proposing Muslim detainees of "no security interest" be treated as "hostages", indicating no real intention that the camp be closed "immediately"(P1097), claimed he knew nothing about that report:T.44265.
DRLJAČA was a man who "did mostly as he pleased"; there was not much cooperation between DRLJAČA and ŽUPLJANIN:T.44265.	Confronted with 30-Jul-1992 decision from ŽUPLJANIN appointing DRLJAČA as Prijedor SJB Chief retroactive to 29-Apr-1992(P6379), asked why such an appointment would be made if ŽUPLJANIN were displeased with DRLJAČA, stated he did not know anything about the appointment and persisted that the two men did not agree, despite the fact that DRLJAČA continually filed reports from the Prijedor SJB to the Banja Luka CSB:P6379, pp.5-6;T.44265-44266.
Other credibility/reliability issue	
Admitted that on DRLJAČA's orders, destroyed documents pertaining to the wartime period in 1992 he had kept in his Omarska Police station locker:T.44288-44290.	

Ratko MILOJICA

Claim contradicted by own statement	
Claim	
Denied being present or having any involvement with murder of Catholic priest, Ivan GRGIC, in 1992:T.46303.	Contradiction Confronted with statement(P6623), which he acknowledged signing, wherein he admitted he was present inside the priest's house when cohorts searched it, stole

	<p>priest's money and beat him; he was in the car together with cohorts and priest when priest was kidnapped and then killed with MILOJICA's rifle; MILOJICA shared the stolen money. Claimed he could not remember statement and that someone else may have given it, but accepted he was in fact present at the killing, giving an alternative account of events that minimised his own involvement:T.46303-46307.</p>
Other credibility/reliability issue	
	<p>Testified in BiH Court on behalf of cousin accused of murder. Court did not accept testimony, determining it was designed only to help his relative:T.46300-46303;P6622.</p>

Simo MIŠKOVIĆ

Claim contradicted by own statement	
Claim	Contradiction
<p>Refused to accept prior testimony on the purpose of Variant A/B:T.45365-45367.</p>	<p>Previously testified the purpose of Variant A/B was to create functioning Serb organs in the event Serb territories were to secede from the rest of Bosnia:P6587,p.60.</p>
<p>Shown point 5 of 23-Apr-1992 SDS minutes which state, "immediately start working on the take-over, the coordination with the JNA notwithstanding"(D1830), refused to acknowledge that this entry reflects that the SDS was preparing to take over power and if the JNA was not willing to do it, they would carry it out with armed Serb reservists and police:T.45377-45379.</p>	<p>Shown same entry of same document in prior testimony(P6587,p.84), stated "[I]t meant that certain preparations had to be made [...] in order to take over power" and that if the JNA was not willing to do it then they would carry it out with armed police and reserve forces:T.45379-45380.</p>
<p>Denied going to Kozarac after it was shelled and seeing homes and buildings destroyed by the shelling:T.45385.</p>	<p>Confronted with prior testimony stating(P6587,p.104) he went to Kozarac after the shelling and saw houses and buildings destroyed, said "Thank you for having reminded me" and agreed to this prior testimony:T.45385-45386.</p>
<p>When he visited Omarska, he could not determine the physical state of the detainees:T.45388.</p>	<p>Previously stated that detainees "looked ill or looked bad":P6590,p.63.</p>
<p>Did not know whether the Omarska detainees he saw were forced to sing Serb or Chetnik songs, although he heard them sing:T.45391.</p>	<p>Previously stated that someone made the detainees sing Serb or Chetnik songs:P6590,p.69.</p>
<p>Only "later" learned about the Keraterm investigation centre:D4206,para.13.</p>	<p>Acknowledged learning about a massacre of Keraterm prisoners shortly after it happened:T.45393-45394.</p>

<p>Did nothing to find out what was being done to investigate alleged massacre of Keraterm prisoners or to bring the perpetrators to justice. Claimed the party was frozen at the time and he could not interfere as an ordinary citizen in the work of others, particularly armed persons:T.45394-45395.</p>	<p>Asked about references to theft and war profiteering in his 5-Oct-1992 platform(P6592,p.2), stated “you must request all the authorities, including the military authorities, to do their job in order to prevent such behaviour”:T.45400-45401.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p>	
<p>Did not remember attending a February 1992 extended Main Board session at which KARADŽIĆ activated stage two of Variant A/B or passing on KARADŽIĆ's instruction to the Municipal Board:T.45367.</p>	<p>Contradiction Confronted with 17-Feb-1992 Prijedor SDS Municipal Board meeting minutes(P5516,p.1) recording MIŠKOVIĆ reporting on the meeting held in Sarajevo, that KARADŽIĆ was the main speaker and that “it is necessary to activate the second stage of the position stated by the SDS BH Main Board”, refused to acknowledge he was transmitting KARADŽIĆ's instructions to activate stage two of Variant A/B:T.45368-45369. Shown Sarajevo Holiday Inn receipt for the night of 14/15 February in MIŠKOVIĆ's name(P6551), claimed he only stayed at the Holiday Inn once, when he received Variant A/B:T.45374-45375.</p>
<p>Prijedor SDS had a conflict with local municipal officials which culminated in October 1992 with MIŠKOVIĆ threatening to resign; was seeking to distance himself and the party from “all the negative conduct in Prijedor” and MIŠKOVIĆ's 5-Oct-1992 platform reflected the Municipal Board's basic policy:D4206,paras.6,16.</p>	<p>Put to MIŠKOVIĆ that his platform(P6592,p.3) and related letter to STAKIĆ, KOVAČEVIĆ and DRLJAČA(D4209) only mention theft, war profiteering, and abuse of office, claimed they were concerned with all crimes, but that these crimes were the most “obvious”:T.45400,45402. Confronted with the fact that the Keraterm massacre was known to MIŠKOVIĆ and was an “obvious” and much more serious crime, initially claimed the platform was adopted before the massacre, then admitted the platform was issued on 5-Oct-1992 and the Keraterm massacre happened in July:T.45403.</p>
<p>Other credibility/reliability issue</p>	
<p>Claimed that the 30-Apr-1992 SDS takeover in Prijedor was intended to ease rising tensions and ensure peace:D4206,para.14. Refused to agree that Muslims and Croats would have viewed the SDS's unilateral takeover from the democratically elected authorities as a provocative move that would inflame ethnic tensions:T.45376-45377. Later claimed “the Serb side was forced to carry out this take-over” in light of WWII events:T.45378-45379.</p>	
<p>Asked in re-direct what he meant by point 6 of his 5-Oct-1992 platform(P6592) which states, “To establish a general and unified policy towards the non-Serbian population”, incredulously claimed that ‘Prijedor was an exception because there was not a single excess on our territory against the Croat or the Muslim population [...] and that's why we wanted a general policy established to maintain that’:T.45421.</p>	

Slavko PUHALIĆ

Claim contradicted by own statement	
Claim	Contradiction
People in Trnopolje were not surrounded with barbed wire as claimed by foreign media; journalists filmed from an area where they were surrounded by a barbed wire fence:D4008,para.18;T.43397-43398.	Trnopolje camp and the building complex were fenced in, with concrete posts, netting on bottom and barbed wire on top(D4008,paras.15,17); . See <i>also</i> E. VULLIAMY:T.21114-21116: compound fenced on 3 sides, building on 4 th side; detainees were fenced in.
No one was brought to Trnopolje by force:D4008,para.19.	Confronted with evidence that people had been rounded up and brought involuntarily by bus to Trnopolje, backtracked, saying, “[w]ell, I don’t know exactly”, claiming he was not present at those times:T.43427. Admitted maybe he was there during the time Prijedor was “attacked” and some people were brought to Trnopolje, then claimed lack of memory:T.43427.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Trnopolje was not surrounded by soldiers; there were no machine gun nests or guards holding guns against the camp:D4008,para.21;T.43425-43426.	Confronted with evidence (C.MCLEOD:P712; [REDACTED] equivocated and claimed he did not remember. Then claimed the guard may have put his gun down as he passed by, then narrowed his denial to the claim he did not see civilians held at gunpoint:T.43426.
Trnopolje was an open camp; people were free to leave even if they did not have documents:T.43430,43432.	Confronted with evidence that: -People required to leave documents with guard before leaving camp, ensuring their return:D4008,para.9;T.43429-43431. -Bosnian Serb military and political authorities referred to Trnopolje as a “prisoner-of-war” camp:D1872,p.1;P3721. -Hospital records indicated treatment given to a “prisoner” from Trnopolje:P6501. disclaimed knowing why documents had to be left with guards and wondered aloud, “Where could they go?”; had no explanation for the other evidence that people were referred to as “prisoners”:T.43431-43432.

Dragan RADETIĆ

Claim contradicted by other reliable evidence	
Claim	Contradiction

<p>The military prosecutor and military court were set up at the end of September or beginning of October:T.45690;D4226,paras.8-9.</p>	<p>Confronted with KARADŽIĆ's 31-May-1992 Decision establishing military courts and prosecutor's office(P3602), [REDACTED], military prosecutor's logbook showing office was operational at least from 19-Jul-1992(P3608) and 24-Aug-1992 military prosecutor file for ZIGIĆ with RADETIĆ as desk officer(P6595), RADETIĆ admitted the military prosecutor's office was in existence in mid-July and he began work there at the end of Aug-1992, then attempted to downplay its role by claiming it was poorly manned and furnished:T.45695-45696.</p>				
<p>Other credibility/reliability issue</p> <p>Emphasised only present at Keraterm for 12-15 days, worked only from 10:00am to 4:00pm, entered the premises through a backdoor to the interrogation offices, and never entered the general area where detainees could be observed:T.45667-45675,45683-45684;D4226,paras.28-31,33. Despite such limited experience and exposure, offered sweeping opinions about: the "proper treatment" of detainees and that they were not verbally or physically tortured(D4226,para.32); the number of people in Keraterm and in Keraterm rooms (D4226,paras.36-38); and whether people were beaten on arrival(D4226,para.43). Although backtracked from his assertion that no one was beaten at Keraterm, to a claim that no one was beaten in his presence(D4226,paras.44-45), otherwise disclaimed other facts merely because he had not heard about them:D4226,paras.46-48.</p> <p>Despite being a lawyer, former JNA and MP member, and long-time Prijedor resident, could not read simple maps of Prijedor to mark the locations of Keraterm camp where he worked, Kozara Putevi military barracks where his military command was located across the street from Keraterm, or Zarko Zgonjanin military barracks where he also worked:T.45671-45676,45687;P6594.</p>					
<p style="text-align: center;">Srdo SRDIĆ</p> <table border="1" style="width: 100%;"> <tr> <td data-bbox="901 1232 1061 2060"> <p>Claim contradicted by own statement</p> <p><i>Claim</i></p> <p>Helped Muslims and Croats during the war:D2265,pp.6,13,22,50,55.</p> </td> <td data-bbox="901 174 1061 1232"> <p><i>Contradiction</i></p> <p>At 34th Assembly, openly criticized those who "ha[d] not done what they had been asked. They should have cleansed their municipalities, as we had done":P1379,p.161. At 24th Assembly, praised Bosnian Serbs who restored Serb territory taken in 1941 and declared not "a single inch of the land" should be given to "those vile traitors and brats who want to share the municipality of Prijedor":P921,p.32. At 53rd Assembly, warned against entering into an agreement which would enable Muslims to return "like a swarm of flies [...] to the territory they had left":P988,p.49.</p> </td> </tr> <tr> <td colspan="2" data-bbox="1061 174 1396 2060"> <p>In OTP interview, acknowledged it was the army that attacked Hambarine and</p> </td> </tr> </table>		<p>Claim contradicted by own statement</p> <p><i>Claim</i></p> <p>Helped Muslims and Croats during the war:D2265,pp.6,13,22,50,55.</p>	<p><i>Contradiction</i></p> <p>At 34th Assembly, openly criticized those who "ha[d] not done what they had been asked. They should have cleansed their municipalities, as we had done":P1379,p.161. At 24th Assembly, praised Bosnian Serbs who restored Serb territory taken in 1941 and declared not "a single inch of the land" should be given to "those vile traitors and brats who want to share the municipality of Prijedor":P921,p.32. At 53rd Assembly, warned against entering into an agreement which would enable Muslims to return "like a swarm of flies [...] to the territory they had left":P988,p.49.</p>	<p>In OTP interview, acknowledged it was the army that attacked Hambarine and</p>	
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<p>leadership, to remove Muslims from Prijedor:D2265,pp.50,56.</p>	<p>created an “ethnically cleansed part of Prijedor”:D2265,pp.28-30,57. Agreed the widespread destruction of non-Serb homes in Prijedor and elsewhere was so that the Muslims would “move away and have nothing to come back to”:D2265,p.56.</p> <p>At 34th Assembly, stated some municipalities were experiencing problems with housing of Serb families because “they have not done what they had been asked. They should have cleansed their municipalities, as we had done, and they would have not had any problems”:P1379,p.161.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>Denied seeing or receiving Variant A/B and was not present at any meeting where they were discussed:D2265,pp.11-13.</p>	<p>Contradiction</p> <p>Present and/or actively participated in 5 separate meetings where Variant A/B explicitly discussed:</p> <p>-27-Dec-1991, SDS Prijedor Municipal Board meeting where MIŠKOVIĆ relayed and explained Variant A/B(P2595). Despite speaking at meeting(P2595,p.3), denied being present:D2265,p.13.</p> <p>-26-Jan-1992 6th Assembly where ČIZMOVIĆ stated “[t]asks set out in the instructions of 19-Dec-1991 should be carried out”:P1349,pp.9(SRDJIĆ listed to speak),14.</p> <p>-14-Feb-1992 extended session of the SDS Main and Executive Boards where KARADŽIĆ activated the second stage of Variant A/B:P12,pp.17,24. <i>See also</i> SDS Prijedor meeting at which MIŠKOVIĆ gives briefing on 14 February meeting and SRDIĆ briefs on Assembly session:P5516.</p> <p>-33rd Assembly at which Jajce Municipality President recalled Variant A/B and its implementation:P1377,p.148(SRDIĆ present/speaking at p.153).</p>

<p>Milomir STAKIĆ</p>	
<p>Claim contradicted by own statement</p>	
<p>Claim</p> <p>“The main reason for moving out [of non-Serbs] was the constant fighting, the lack of electric power, water and basic food provisions”:D4195,para.26.</p>	<p>Contradiction</p> <p>Admitted, “It is a fact that crimes were committed. It is a fact that they [Muslims] were expelled from their homes and thereby compelled to leave the area”; agreed that “most of them left out of fear and so on and so forth”:T.45269. Confronted with contradiction between this evidence and witness statement, claimed statement was merely a summary, then provided a</p>

<p>“[A]t the time, I knew about two natural deaths that occurred at the Omarska centre” based on a report from Simo DRLJAČA(D4195,para.24); “that is the only thing I know with regard to Omarska”:T.45192.</p>	<p>non-responsive answer about the nature of war:T.45270. Acknowledged he had information that people were going to centres like Omarska, taking out prisoners and killing them:T.45249-45250.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p>	
<p>Prijedor CS met for the first time on 29-May-1992:D4195,para.39.</p>	<p>Contradiction Shown Prijedor CS’s 23-May-1992 ultimatum to Hambarine’s population(P3485), claimed this did not reflect a CS decision but was a press release issued by CS press officer:T.45230-45231. Shown document stating the Prijedor CS decision on mobilization was reached at the 22 May meeting(P3537), could not plausibly reconcile this document with his evidence:T.45276-45277.</p>
<p>Trnopolje was not under CS’s control. They turned to CS for assistance with food and medicine:D4195,para.49;T.45239-45240.</p>	<p>Shown CS decision forbidding individual release of persons from Trnopolje, Omarska and Keraterm(P2915,p.3), claimed this was not an order but “some kind of opinion on my part”:T.45241-45242.</p>
<p>“I could not issue any orders to Mr. DRLJAČA to release somebody or to keep him there”:T.45242.</p>	<p>Shown 2-Jun-1992 CS order signed by STAKIĆ ordering release of various categories of persons and placing the SJB in charge of implementing the decision(P2741), claimed document was a decision, not an order, DRLJAČA could implement it or not, and it was just “a request on our part to seek the help of the police”:T.45243-45244. Regarding the decision’s mandatory language, stated only that it says “decision” rather than “order”:T.45244-45245. Asked whether an SJB document stating the police were fully observing a CS conclusion on the release of prisoners(P2637) reflected DRLJAČA’s implementation of a CS decision, didn’t answer the question, instead straying into the reason for the CS conclusion:T.45245-45248.</p>
<p>CS could not give orders to the army or police. As far as STAKIĆ is aware, the intervention platoon that the CS ordered be created was never formed:D4195,para.21.</p>	<p>Shown SJB report informing CS about the implementation of CS order to form intervention platoon(P2637), denied this document contradicted his claim that the CS could not give orders to the police, claiming what DRLJAČA wrote is one thing “and his actions were different”:T.45247-45248.</p>
<p>Asked whether Keraterm, Omarska and Trnopolje “were formed according to a decision of the civilian authorities in</p>	<p>Shown an interview from late 1992 where he answered “[y]es, yes” to the exact same question(P6582,p.2), questioned the accuracy of the translation of his</p>

Prijedor”, denied this, stating that the CS did not establish these centres:T.45254.

testimony:T.45256-45257.

Other credibility/reliability issue

Agreed that when he stated in an interview with a foreign journalist that Muslims were “artificially created” that this was “ugly” and “sounds offensive” and “it was a mistake that I said this”. Added that “this was wartime” and “[t]here was propaganda on both sides”:T.45258-45259.

Rogatica

Novica ANDRIĆ	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Šefik HURKO's "false testimony" was rejected by Sarajevo's Cantonal Court, resulting in an acquittal for the mistreatment of HURKO's family in Mićo ANDRIĆ's garage:T.34448-34449.	After Defence checked the Cantonal Court's judgment which did not mention the incident(D3044), claimed Prosecutor amended the indictment to withdraw allegations relating to HURKO's family:T.34450-34453.
HURKO family members were not mistreated while in the garage:D3038,paras.10-11;T.34456.	Informed that Stojan PERKOVIĆ pleaded guilty and was convicted for this incident(D1665,pp.2-3), maintained there was no mistreatment:T.34456.
Civilians were not detained with other military prisoners at Rasadnik, but housed in a reception centre next to it:T.34457-34458.	Confronted with DK list of "prisoners of war in the <i>Vilji</i> Camp, Rogatica" which included Muslim females(P6155), denied " <i>Vilji</i> " referred to Rasadnik, and maintained civilians were held at a "reception centre" at Rasadnik:T.34458-34461,34479.
Had "no insight" into identities of civilians detained at Rasadnik; his job was only to deal with soldiers who violated military discipline:T.34460.	Confronted with evidence of his involvement in transfer of civilian detainees from Rasadnik to Zvornik(P6153;T.34461-34462), admitted the civilians identified were held at the "reception centre" at Rasadnik but stated he did not know "about all the people who were there":T.34462,34479.
Other credibility/reliability issue	
Witness's father, Miodrag (Mićo) ANDRIĆ(D3038,paras.10-13;T.34453-34454), owned the garage where the HURKO family was mistreated in mid-August 1992:P3267,paras.6-11;T.18226-18230.	

Tomislav BATINIĆ	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Put to him Rogatica's Serb Municipal Assembly was established pursuant to SDS Main Board instructions, claimed he had not received any such instructions:T.33668.	Confronted with report on Municipal Assembly's work(P3407,p.5) reflecting creation of the Assembly pursuant to Variant A/B, acknowledged reading this document and learning this fact two or three days previously:T.33669-33670.
Serbian Municipal Assembly held no sessions until after the municipality's division on 3-May-1992:D2930,para.14;T.33670-33671.	Confronted with contradictory documents, agreed—with no explanation for his prior denial—the Assembly sat on 26-Dec-1991 where he was elected President(P3407,p.8), and on 15-Apr-1992 where it authorised the CS to

<p>Rogatica CS was formed in early April 1992:D2930,para.18;T.33673.</p>	<p>perform the duties of the Executive Committee:P2835,p.3;T.33671-33673. Admitted—without explaining his contrary evidence—the CS existed prior to 8-Apr-1992, was extended on that date(P2835,p.1), and he was a member of both:T.33673-33674.</p>
<p>Never heard from Rogatica Brigade command that Muslim civilians were taken from their villages to Veljko Vlahović Secondary School:T.33681-33683;D2930,para.26.</p>	<p>Confronted with KUŠIĆ's letter informing him directly that, with the Municipal Assembly's approval, civilians were being taken to the School and elsewhere(D2913,D2914), stated this "reminded" him that he received such information:T.33683-33684.</p>
<p>Muslim inhabitants of Šatorovići, Osovo, Okruglo, Tmorni Do and Burati remained in their villages throughout the war:T.33690;D2930,para.30.</p>	<p>Put to him the remaining Muslims from these villages were in fact expelled in October 1994, agreed they left at that time but claimed it was "at their request":T.33691. Eventually conceded these people lived "in fear daily":T.33691-33695.</p>

Milovan LELEK

<p>Claim contradicted by own statement</p>	
<p>Claim</p> <p>Provided detailed evidence regarding Veljko Vlahović Secondary School, stating civilians received three meals a day, were free to go to their houses, there was no minefield and no machine-gun nests, no one was raped or mistreated, and not more than 200-250 people passed through the centre:T.34384-34391.</p>	<p>Contradiction</p> <p>Confronted with official note of his 2004 interview where he stated he had heard from unknown persons that there were some collection centres where Bosniaks were kept, did not know they were mistreated or tortured, and did not go to areas where collection centres were located(P6151), agreed this accurately reflected what he told police in 2004:T.34406-34410.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>There was no shelling by Serb forces on 22-May-1992:T.34401.</p>	<p>Contradiction</p> <p>Confronted with evidence of numerous witnesses(T.18223;P59,pp.21-24; [REDACTED];P127,pp.3-4;P128,pp.2-3; [REDACTED]), including a Defence witness(T.33460), that there was a major shelling attack on 22-May-1992, continued to deny it took place, claiming it was not possible because there were still Serbs in Rogatica town at the time:T.34402-34404,34433-34434.</p>
<p>People came to Veljko Vlahović Secondary School "of their own free will" and for their own safety:T.34384-34385,34428-34429.</p>	<p>Confronted with passage from verdict against Rogatica Brigade member Radosav LJUBINAC (aka "PJANO") describing forcible transfer of Muslims from Seljani to the School, their detention and expulsion(P6106,p.3), stated he</p>

<p>Rasadnik was a military detention facility; Muslim detainees held there were being investigated on various grounds, including for possessing weapons or firing at Serb villages:D3031,para.19;T.34412-34413,34419-34420,34426.</p>	<p>was unaware of these facts and not in a position to comment:T.34410-34412. Confronted with evidence showing detention of a number of elderly men and women at Rasadnik(P4867,p.4;P6152,pp.9-14; [REDACTED];P3267,para.38), conceded there were civilians detained there when the School was closed:T.34414-34418. Then claimed civilians at Rasadnik, including Muslims from Berkovici village, were not in fact detained, but housed in a “collection centre” next to the military detention facility:T.34419-34420. Confronted with DK list of “captured persons of Muslim ethnicity” in Rogatica(P6153), listing persons from Berkovici, including three women, continued to deny they were detained despite the document’s title:T.34421.</p>
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Mile UJIĆ

Mile UJIĆ	
<p>Claim contradicted by own statement <i>Claim</i></p> <p>Was Rogatica Brigade Acting Chief of Staff from June until September 1992; was not artillery coordinator until end of 1993:D2909,para.4;T.33445-33447.</p>	<p>Contradiction</p> <p>Confronted with 2004 statement that he was Rogatica Brigade Chief of Staff between early May and end of 1992, and the main artillery coordinator until end of 1993(P6104,p.4), agreed with it, without explaining prior contrary evidence:T.33447-33448.</p>
<p>Claim contradicted by other reliable evidence <i>Claim</i></p> <p>Denied that, by 24-Mar-1992, the Serb TO was threatening to attack Rogatica town, stating both sides were issuing such threats:T.33452.</p>	<p>Contradiction</p> <p>Confronted with letter signed by himself, BATINIĆ and VESELINOVIĆ to KARADŽIĆ on 25-Mar-1992(P6105) referring to a group of “armed Serbs” headed by KUŠIĆ threatening to attack the town if the municipality and police station were not unconditionally divided, with no mention of threats from the Muslim side, nevertheless insisted such a threat existed:T.33452-33454.</p>
<p>Veljko Vlahović Secondary School was a “safe house” where civilians of all three ethnicities took shelter voluntarily. They were not forcibly expelled from Serb-held territory, but left voluntarily:D2909,paras.27,41;T.33461-33464,33476-33477.</p>	<p>Confronted with conviction of Rogatica Brigade member Radosav LJUBINAC (aka “PJANO”) for forcibly transferring Muslims to and away from the School(P6106), continued to deny the School was a camp, but admitted if they were not at the School these Muslims faced “murders, mistreatment, and torture”:T.33464-33465.</p>

Sveto VESELINOVIĆ

Claim contradicted by own statement	
<p>Claim</p> <p>Was a JNA member between early April and late May 1992(T.33892-33894), when deployed to the CS:D2959;D2960;T.33879-33880. Was assigned to the Rogatica Municipal Assembly Executive Committee on 30-Jun-1992(D2961;T.33881). Entered Rogatica town once it came under Serb forces' control(D2963;T.33883-33887).</p>	<p>Contradiction</p> <p>Confronted with official note of his 2004 interview stating he remained in the JNA until around-Sep-1992, was not present in Rogatica town between March-September 1992, and was not aware of events surrounding the creation of the CS or its later actions(P6129), claimed it was a "typo" or a "mistake". Could not plausibly explain why the substance of the note completely contradicted his testimony:T.33905-33909.</p>
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Rogatica's Serbs were ready to face any threat posed by Muslims, but did not organise themselves to take action. Only "tried to help the JNA to mobilise people" in response to boycotts:T.45093-45094.</p> <p>Denied Serb forces deployed tanks or heavy weapons around Kramer Selo:T.33896.</p> <p>Denied Serb soldiers were capturing, detaining and expelling Muslim civilians in Rogatica; "Muslims soldiers were being captured":T.45107.</p>	<p>Contradiction</p> <p>After several evasive answers, eventually admitted to being "Sveto" in 20-Sep-1991 conversation with KARADŽIĆ where witness stated "OK boss" to KARADŽIĆ's instructions to fully mobilise the party and "all the forces that you have":P3406;T.45094-45101.</p> <p>When confronted with Mile UJIĆ's evidence that UJIĆ coordinated artillery for Rogatica Brigade's attack on Kramer Selo(T.33466-33467), disclaimed any knowledge of the attack or weapons used:T.33896-33897.</p> <p>Confronted with DK list of captured Muslims, including 16 mostly elderly women from Rogatica(P6153), provided inconsistent answers, initially claiming they "probably happened to be in a combat zone", then stating he had no idea as he had no contact with the army, before asserting "[t]hese women must have been evacuated from a combat zone":T.45107-45108.</p>

Sanski Most

Branko DAVIDOVIĆ

Claim contradicted by own statement	Contradiction
<p><i>Claim</i></p> <p>Not true that Serbs seized power by force and that 6th Brigade took part in the attack on the Municipal Assembly: D4233, paras. 18, 27.</p>	<p>Confronted with 6th Brigade Commander BASARA's war-time record describing how the Brigade assisted in seizing power and securing the takeover of the municipality (P3660, p.3), denied knowledge of the document: T.45900-45901.</p> <p>Confronted with 1992 6th Brigade combat report he took part in drafting (D4233, para. 15), stating that on 20-Apr-1992 "the brigade took control of all the more important facilities and localities in town" (P3663, p.4), maintained position that Brigade did not play integral part in Serb takeover: T.45902-45903.</p> <p>Confronted with 6th Brigade Commander BASARA's war-time record, stating that with the arrival of the Brigade the Muslims and Croats became afraid and "the Serbs heaved a sign of relief", that task of the Brigade was "to prevent the slaughter of the Serbian people," and that a trick was devised to prevent Muslim and Croats joining the Brigade and to "arm the Serbs publicly and legally" (P3660, p.2), maintained the Brigade's task was to prevent interethnic conflicts: T.45896-T.45899.</p>
<p>It was not 6th Brigade policy to destroy villages in which resistance was shown or suspected: T.45909.</p>	<p>Confronted with Serb armed forces statement broadcast on Radio Sanski Most that "resistance will force us to destroy and devastate your villages [...] As long as one of you has a weapon, you risk the destruction of your houses and families" (P725, p.7), denied knowledge: T.45909-45911.</p> <p>Confronted with fact that 6th Brigade members shot unarmed women and children sheltering in a garage in Hrustovo, stated there was "real combat at the time and it's possible that such things happened": T.45911.</p> <p>Confronted with BASARA's order, the day after Hrustovo and Vrhpolje incidents, in which he forbids "acts of genocide against the population of the</p>

<p>Brigade neither arrested nor brought in civilians:D4233,para.26.</p>	<p>opposing side who are unable to fight”(P3601), claimed there were out-of-control individuals:T.45911-45913.</p> <p>Confronted with 3-Sep-1992 1st KK combat morale report (from period in which he was the 6th Brigade assistant commander for morale) stating that in towns including Sanski Most there is a large number of arrested citizens for whom there is no evidence or criminal reports that they participated in armed rebellion(P3929,p.3), claimed people were brought in by public security workers not army:T.45914-45915.</p> <p>Confronted with CSB Banja Luka report, 18-Aug-1992, stating specifically for Sanski Most that “most of the persons, about 90%, were brought in by the army as prisoners from the zones where there had been fighting”(D470,p.14), maintained with “full responsibility” that he does not know about this and that he and his battalion “never arrested a single Muslim”:T.45915-45916.</p>
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Mikan DAVIDOVIĆ

Claim contradicted by other reliable evidence

Claim

Nobody forced non-Serbs to move out. Rather, they were part of a process that entailed resettlement of all ethnic groups seeking to leave a territory controlled by another ethnic majority and move to an area controlled by their own people:D4166,paras.7,20.

Contradiction

Confronted with May 1992 Serbian Armed Forces Command statement broadcast on Serb Sanski Most Radio(P725,p.7) stating: “you’re not capable of standing up to the forces of the [VRS] [...] your resistance will force us to destroy and devastate your villages, which means that you will not be able to live with us in these territories”, said he could not comment on how this affected non-Serbs and limited his knowledge to end of 1993:T.44516-44521.

“Not correct” that almost all Muslims had left the municipality in 1992:D4166,para.23.

Confronted with 1993 census showing of 28,285 Muslims living in the municipality in 1991 only 4390 remained in 1993(P6548,p.6), stated he “possibly” knew this at the time:T.44524. Confirmed only when shown decision appointing him to 1993 census commission(P6549) that he participated in production of this census:T.44525.

Mile DOBRJIJEVIĆ

Claim contradicted by own statement

<i>Claim</i>	<i>Contradiction</i>
<p>Denied people were detained without any need, claiming those detained were part of armed rebellions or subjects of investigation:T.44636-44639.</p>	<p>Confirmed his BiH testimony that “maybe not all rules were obeyed at the time [...] Simply, some citizens were brought in by the army, some by the police, without any knowledge on our part, and in my opinion, without any need”:T.44637. Confronted with August 1992 IKK report stating tensions are still present in Sanski Most and other areas “because of a large number of arrested citizens for whom there is no evidence or criminal reports that they participated in the armed rebellion”(P3929,p.3), confirmed that from April until August 1992 only one prisoner was charged with criminal offenses:T.44639-44640.</p>
<p>Most detainees were interviewed in Sanski Most:T.44641.</p>	<p>Confronted with his BiH testimony, stating “it was a large number of people so most probably they could not all be interviewed [...] because of the workload and the number of people who were transported” to Manjača”(P6555,p.1), claimed the quote is “incorrect”:T.44641-44643.</p>
Claim contradicted by other reliable evidence	
<i>Claim</i>	<i>Contradiction</i>
<p>Witness and his colleague treated everyone “professionally, very humanely and within the limits of our powers”:D4170,para.13.</p>	<p>Confronted with Daniluško KAJTEZ’s letter to Vlado VRKEŠ stating that at Manjača, KAJTEZ and others liquidated 12 people on two occasions, as ordered and witnessed by VUJANIĆ, KRUNIĆ, and “Mile and other inspectors”(P6556), witness—nickname “Mile”(T.44628)—claimed this did not refer to him:T.44644-44645.</p>
<p>It was Sanski Most police policy and practice to fully investigate crimes regardless of ethnicity:D4170,paras.21-22.</p>	<p>Confronted with Daniluško KAJTEZ case showing: -KAJTEZ, who murdered 8 Croats, was released on his own proposal to be returned to his unit(P6557); and -Sanski Most SDS municipal board president VRKEŠ and the 6th Brigade 4th Battalion commander advocated to the Military Court that KAJTEZ be treated leniently(P6542), denied knowledge. Confronted with fact that KAJTEZ was not tried for these crimes until 2006, in which trial the witness himself testified, first claimed he did not know when KAJTEZ was tried, stating “perhaps I read it in newspapers”, but finally conceded that he testified as a prosecution witness in 2006: [REDACTED]</p>
Other credibility/reliability issue	

Witness, SJB member who interrogated detainees at Sanski Most detention facilities and Manjača camp, sought to minimise his role in inhumane treatment of detainees:P6556;T.44643-44651.

KW-540	
Claim contradicted by own statement	Contradiction
Claim [Redacted]	[Redacted]
[Redacted]	[Redacted]
Other credibility/reliability issue	
[Redacted]	[Redacted]

KW-545	
Claim contradicted by other reliable evidence	Contradiction
Claim [Redacted]	[Redacted]
[Redacted]	[Redacted]

Other credibility/reliability issue	

Dušan MUDRINIĆ	
Claim contradicted by own statement	
Claim	Contradiction
Not correct that SOS members were trained in handling explosives:T.47375.	Confronted with his 22-Dec-1992 statement to Sanski Most Police that he and SOS unit members were trained in handling explosives(P6683,pp.2-3), continued to deny this, claiming perhaps this was a reference to his JNA training in 1975:T.47375-47376.
Claim contradicted by other reliable evidence	
Claim	Contradiction
SDS had nothing to do with establishment of the SOS. Sanski Most SOS did not receive any directives from anybody:D4387,para.4. Witness never heard of monies received from CS, if anything received it was a minor financial aid:T.47369-47370.	Confronted with SOS Staff Proclamation, 13-Apr-1992, stating that on 12-Apr-1992 an SOS unit was formed in Luška Palanka and put under JNA command, and that the unit's insignia and uniforms were designed on the basis of an agreement with the JNA and ARK(P6680), did not agree SOS belonged to a larger organisation but confirmed JNA insignia were adopted:T.47366-47367. Confronted with 6 th Krajina Brigade report on SOS activities and participation in combat, 4-Sep-1992, stating the SOS was formed and placed under the command of the Brigade, that all actions were carried out with the approval of

	<p>the Brigade command, and that members of the SOS have carried out “many important tasks and activities as the members of the Sanski Most SDS”(P6681), disputed contents of report:T.47368-47369.</p> <p>Confronted with Sanski Most CS conclusions, 18-Jun-1992, showing TO commander ANIČIĆ reporting to the CS on SOS activities and CS approving financial assistance to the SOS(P6682), claimed he never received that financial assistance:T.47370-47371.</p>
<p>Not true that SOS blew up buildings of non-Serbs:T.47377.</p>	<p>Confronted with-Sep-1992 SOS Report, stating “blowing up buildings was not in anyone’s interest, but we could not crush Ustashas and the Green Berets any other way”(P3397), stated the explosions that happened were “not major explosions”, were “perhaps hand-grenades” and nobody was hurt or wounded:T.47385.</p>
<p>Other credibility/reliability issue</p>	
<p>Witness was leading member of notorious SOS group, responsible for systematic crimes against non-Serbs in Sanski Most as evidenced by Prosecution and Defence witness testimony and contemporaneous documents: [REDACTED];P6681. Sought to minimise his responsibility by claiming there was no crime and fewer criminals in Sanski Most(T.47379), that he and his fellow SOS members were “gifted” non-Serbs’ property(T.47394-47397) and that he had no involvement with ARKAN in 1995:T.47403-47407.</p>	
<p>Vinko NIKOLIĆ</p>	
<p>Claim contradicted by own statement</p>	
<p>SOS did not forcibly remove Croatian SDK director:T.45446.</p> <p>SOS was not armed until April 1992:D4214,para.28.</p> <p>Not true the SOS blew up buildings owned by Muslims and Croats:T.45453.</p>	<p>Contradiction</p> <p>Confronted with-Sep-1992 report on the work and activities of the SOS, signed by himself, stating “we, fellow Serbs, carried out a raid on the Sanski Most SDK, took away the keys from the stubborn Croatian woman-director who refused any form of cooperation or agreement, and continued according to the plan”(P3397,p.4), denied this:T.45446-454478.</p> <p>Confronted with SOS report, signed by himself(P3397,p.2), confirmed the SOS helped arm Serbs in Sanski Most prior to conflict:T.45452-45453.</p> <p>Confronted with SOS report, signed by himself(P3397,p.3), stating “blowing up buildings was not in anyone’s interest but we could not crush the Ustasha and Green Berets any other way”, claimed they were there to keep the peace,</p>

	and “some individuals, taking advantage, probably did things like this”:T.45453-45454.
Claim contradicted by other reliable evidence	
Claim	Contradiction
People left voluntarily and the authorities did not plan, instigate, or order permanent removal of Muslims from Sanski Most:D4214,paras.14,24.	Confronted with CS member Nenad DAVIDOVIĆ’s notes from: -CS meeting, 8-Jun-1992, stating “move the Muslims and Croats to the extent which would provide for a steady control of power”; and -CS meeting, 10 June, stating “the job of deportation of part of the Muslim population failed.[...]Proposal:[...] appoint a person for deportation of part of the population”(P3635,pp.42,49), didn’t agree CS required Muslims to leave, but subsequently conceded that “in fear for their lives, most of them decided to ask us to secure their journey so that they could go to their own territory”:T.45467-45468.
Other credibility/reliability issue	
Leading member of notorious SOS group and CS member, responsible for systematic crimes against non-Serbs in Sanski Most as evidenced by Prosecution and Defence witness testimony and contemporaneous documents: [REDACTED];KW545:T.46964-46966;P3397; [REDACTED];P6681;D1681.	
Mihajlo ORLOVIĆ	
Claim contradicted by own statement	
Claim	Contradiction
Never personally spread fear:T.46628.	Confronted with his article stating that Muslim and Croats “heinously” killed 5,500 Serbs in WWII, referring to the “Ustasha serpent” rearing its head again, stating “the genocide must not be repeated” and that “the Serbian Democratic Party is working feverishly to pull the Serb people out from under the fierce Islamic clutches and Vatican knife”(P6645), claimed not all these words were his, because newspaper editor “changed a lot and added words of his own”, but accepted “the gist is true”:T.46628-46632. See also P6647, discussed at T.46634-46635;P6652, discussed at T.6648-46649.
Claim contradicted by other reliable evidence	
Claim	Contradiction
All PTT and road connections were cut:D4294,para.27.	Confronted with: -newspaper article, authored by him, published in Banja Luka the day after the

<p>Communiqués given to radio station mainly insisted on preserving peace and order, disarming illegal formations and placing weapons under control. Not true that radio broadcast appeals called on wealthy Muslims and intellectuals to surrender:D4294,para.66.</p>	<p>Sanski Most take-over(P6648); -14-May-1992 CS conclusions appointing him to Sanski Most information service reporting to Radio and Television Banja Luka and Belgrade(P6649); and -summary of his 26-May-1992 news report broadcast(P6650); accepted there were communications, although “impaired”, and they had local road links with Banja Luka:T.46638-46642. Confronted with late May 1992 radio broadcast stating “as long as one of you has a weapon, you risk the destruction of your houses and families [...] If not, we will be forced to act as we did with Mahala”(P725,p.7), agreed this was “probably” a warning:T.46645. Confronted with Faik BIŠĆEVIĆ’s forced statement that Sanski Most is a Serb town, warning that if Muslims and Croats don’t hand over their weapons the town will “continue to be destroyed” and calling on his named “sympathisers” “to join me, to surrender”(P725,pp.5-6), claimed this was done of BIŠĆEVIĆ’s own free will and he read it like a “professional”:T.46649-46652.</p>
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Boro TADIĆ

Claim contradicted by other reliable evidence

Claim

Had no information about BSL or KARADŽIĆ spreading propaganda among the Serbs specifically in relation to the danger that they could be victims of genocide:D4163,para.38. Serbs tried to calm situation and prevent conflict:D4163,paras.38,21(f).

Contradiction

Confronted with:
-speech at Banja Luka SDS rally, 3-Mar-1991(P6540), confirmed it referred to the threat of genocide:T.44396;
-KARADŽIĆ speech at same rally, stating “if it comes to the fall of authority in BiH, you will still have your Serb National Council which will not let you be slaughtered like in 1941”(P6540), accepted this made Serbs more cautious and “organised in order to avoid a repetition of that evil”:T.44397-44398;
-July 1992 propaganda bulletin issued by witness and other leading SDS Sanski Most members(P3640,p.6), referring to a planned genocide against Serbs being schemed by “bloodthirsty enemies”, namely “the Muslims, if indeed they are people (THEY ARE NOT) and the Croats, who have forever carried in their genes a sick pathological desire and urge to kill those better and more honest and-do we need to say this-stronger than they are”, claimed this was still repeating today:T.44399-44402.

Serbs were also engaged in work obligation units:T.44430.

Confronted with his 5-Oct-1994 letter to the Sanski Most Municipal Assembly Executive Board stating that work obligation units “comprising non-Serbs began to be utilized, while the units made up of Serbs never were”(P6541), continued to assert that Serbs had work obligation, and that non-Serbs were put in work obligation units in order to make them “feel useful”(T.44429-44432), while conceding that non-Serbs sent to frontline:T.44433.

Other credibility/reliability issue

Witness, a CS member and 6th Brigade Battalion Commander, contended that an effective way of protecting non-Serbs was to persuade Muslim villagers that the “original hatred that they had of their own brethren whom they deserted by changing their religion, will turn them towards the evil and sly intentions of the West”:D4163,para.7. Testified that non-Serbs could understand he was telling the truth by looking at his face “which emanated love and desire for peace,” and this went towards convincing non-Serbs not to repeat what they had done in 1941. He also inquired, “what would have happened had the Muslims and Croats had the JNA weapons that the Serbs actually had”:T.44402-44404.

Sokolac

Milovan BJELICA	
Claim contradicted by own statement	
Claim	Contradiction
Hygiene was satisfactory at Čavarine:D3206,para.65.	When referred to his contradictory evidence(D3206,para.54), admitted “hygiene measures were not satisfactory”:T.36448-36449. Admitted he did not see the conditions first-hand:T.36450.
Did not say the Serbs did not want to live with Muslims:T.36465.	Admitted it was possible he said this in an interview with the <i>Washington Post</i> in July 2004(P6257,p.3), and that he previously testified that he said it, but it was “taken out of context”:T.36466-36467.
Claim contradicted by other reliable evidence	Contradiction
Claim	Contradiction
SAO Romanija Assembly, which only held one session, was consultative in character:D3206,para.8;T.36416-36417. SAO Romanija government “may have issued a few communiqués” but there were “no other activities”:T36417-36418.	Admitted there may have been “meetings”(P6250,p.1), but maintained there was only one Assembly session:T.36416-36417. When shown evidence of a detailed programme for SAO Romanija Government activities(P6251), denied knowledge:T.36419. Confronted with evidence the Sokolac CS referred question witness himself had raised to the SAO Romanija for resolution(D3227,p.4), maintained it was not a decision-making body:T.36420-36421. Shown a request from the SAO Romanija Ministry of Defence regarding the needs of the wartime hospital in Sokolac(P6252), denied knowledge:T.36424-36425.
Witness and KARADŽIĆ were not involved in sending troops to the Croatian front in 1991:T.36430.	Confronted with intercept between KARADŽIĆ and witness requesting witness to send troops to Western Slavonia(P5802,p.1), claimed this was a misinterpretation of their conversation:T.36430-36431.
Variant A/B neither issued, received or discussed by SDS party organs:T.36439.	Confronted with Jajce Municipal President’s comments regarding the receipt and implementation of Variant A/B at the 33 rd Assembly(P1377,p.148), maintained there is no record of this kind of discussion at an Assembly meeting:T.36440.
Muslims suspected of taking part in sabotage or terrorist operations were detained by military security organs:D3206,paras.54,65.	Confronted with evidence that a 62-year-old Muslim woman was detained first in Sokolac primary school then in Čavarine(P6255), insisted there must have been a justifiable reason for detention, resiling from his previous statement that he hadn’t a clue why she and others were detained:T.36450-36454;P6256.

Dragomir OBRADOVIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>In Muslim villages such as Meljine, there was resistance by Muslim forces:D3175,paras.17,30.</p> <p>The military detention unit was at the Sokolac primary school for only a short period of time, maybe 10 days or so:D3175,para.25;T.36114.</p> <p>Individuals detained temporarily at the Sokolac SJB were either released or referred to the Office of the Prosecutor for further action:D3175,para.23.</p>	<p>Admitted didn't witness the attack on Meljine, and "couldn't even get near there":T.36111.</p> <p>Admitted didn't know how long it operated:T.36115.</p> <p>Admitted Bećir HOMARAC was sent from Sokolac SJB to the military detention facility at Čavarine, but claimed it was "for an exchange" because his village had been "cleansed" and he had "nowhere to return":T.36115-36116.</p>
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Serb forces began disarming Muslim villages only after the end of July 1992:D3175,para.15;T.36091,36120.</p> <p>Muslims from Vrhbarje village remained there until October 1994, when they requested to leave, then "got into their cars and [...] simply left" "of their free will":D3175,para.19;T.36083,36109.</p>	<p>Confronted with evidence that TO Commander Drago MAČAR was disarming Muslim villages in late May 1992(P5242,p.7;M.SELMANOVIĆ:P3295,para.3,T.18550-18551), claimed MAČAR "may have initiated some action on his own," but he was "not in a position to comment":T.36092-36093. Despite purported inability to comment, asserted in re-examination that no weapons were surrendered to MAČAR at that time:T.36120,36130.</p> <p>Confronted with evidence that the villagers were taken under police escort to Kula prison(P6235,p.4), admitted they were taken to Kula by bus:T.36110. Shown his own report that Muslim civilians "were handed over to the Kula KP Dom" by Sokolac policemen(D3189), refused to confirm they were taken to Kula by Sokolac police:T.36110-36111.</p>

Vlasenica

Savo ČELIKOVIĆ

Claim contradicted by own statement	
Claim	Contradiction
The authorities had formed commissions that sealed the houses and flats of Muslims who had left Vlasenica so their property would not be stolen:D2922,para.24.	Acknowledged in cross-examination that the commission allocated this property to Serb refugees and that some Serbs forcibly broke into empty Muslim houses and some forcibly evicted Muslim families from their houses:T.33564.
Serb attacks on Muslims and their property were “not on a large scale”:T.33564.	Confronted with his statement that municipal authorities established Sušica camp “to spare the Muslim population from experiencing stress and mistreatment” and to “protect them from mistreatment or possible physical attacks”(D2922,para.26), stated these groups “demanded” temporary accommodation “on account of fear for their safety”:T.33565.
Muslims were sent to Sušica in order to give them better safety and security guarantees:D2922,para.26;T.33565.	Confronted with evidence reflecting the conditions at Sušica camp to which Muslims were subjected, acknowledged that “the conditions were not fully proper” but stated he “was not familiar with any details relating to the conditions and events taking place in that facility”:T.33565-33566.
Other credibility/reliability issue	
The OHR:	
(i) removed the witness from his position in local government in 1999 on basis that he abused his power by persistently and seriously obstructing the implementation of the General Framework Agreement for Peace, pursued an extra-legal agenda, and consistently refused to take ownership of BiH laws(P6111), and banned him from holding executive office at any level in 2004:T.33551-33556.	

Momir DEURIĆ

Claim contradicted by other reliable evidence	
Claim	Contradiction
Not aware of anyone being killed at Sušica:D2967,para.19.	Confronted with fact of murders, beatings, torture and rapes at Sušica, attempted to minimise his knowledge of events there, then qualified his evidence, saying “no one was killed in my presence”:T.33927. Confronted with BiH State Court judgement convicting a member of the police and a VRS

	<p>member for crimes at Sušica(P6132), conceded “[y]es. I heard of murders, but I wasn’t present”:T.33931-33932.</p>
<p>In Marh 1993, a group of Muslim fighters stationed on Udrč mountain attacked a 1KK unit and killed 12 soldiers:D2967,para.26.</p>	<p>Challenged on this incident, accepted Muslim civilians were passing this way en route from the enclaves to Tuzla, but claimed they attacked the VRS:T.33935. Confronted with 2-Mar-1993 Zvornik Brigade report detailing how the columns of civilians were hit “with every available means”(P4252), stated he was in Cerska at the time of the attack on the 1KK and “what was going on over there, I don’t know”:T.33936.</p>
<p>Other credibility/reliability issue Persistently minimised his knowledge of events at Sušica.</p>	

<p>Mane ĐURIĆ</p>	
<p>Claim contradicted by own statement</p>	
<p>Claim CS adopted the decision of 19-Apr-1992(P6138) to disarm the joint police as the citizens no longer trusted it. The decision was not an attempt to change the ethnic makeup of the police by getting rid of Muslims:D3093,paras.23-26;T.35062-35063.</p>	<p>Contradiction [REDACTED]</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim CS decision to disarm civilians applied to all ethnicities:D3093, para.22. 108 criminal reports were filed against citizens with illegal weapons:D3093,para.47.</p>	<p>Contradiction Confirmed all 108 cases of illegal weapons in the SJB Vlasenica crime register for 1992(P3216) were brought against Muslims:T.35059-35060.</p>
<p>Vlasenica SJB filed criminal reports against policemen for criminal offences and grave violation of duty:D3093,para.39.</p>	<p>[REDACTED]</p>
<p>The special purpose unit under the command of Miroslav KRALJEVIĆ caused problems; they mistreated Muslims and made them “disappear” without a trace. The authorities had no time to control the unit and the police wanted to get rid of it:D3093,paras.31-38.</p>	<p>Confirmed when confronted that unit paid by MUP and witness himself signed payroll:T.35066. Confronted with August 1992 report prepared by the witness(P6192) providing that the unit was formed in April 1992 within the SJB by the Serb authorities and disbanded in late July 1992 by redeploying it to the VRS, confirmed the report:T.35069. Challenged that the unit was disbanded only when there were</p>

	<p>hardly any Muslims left in Vlasenica, conceded “[i]f one was to go by dates, that is so”:T.35068-35069.</p> <p>Shown list of SJB Vlasenica reserve police force(P6193) including unit commander Miroslav KRALJEVIĆ and deputy commander Elvis ĐURIĆ, confirmed they stayed with the police after the unit was disbanded in August 1992:T.35070-35071.</p>
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Zoran DURMIĆ	
<p>Claim contradicted by own statement</p> <p><i>Claim</i></p> <p>To his knowledge, Zaklopača attack was spontaneous. There were JNA convoys passing through Milići that day who had “survived many traumas served up by the Muslims along the way”:D2944,paras.30,31.</p> <p>Claim contradicted by other reliable evidence</p> <p><i>Claim</i></p> <p>On 16-May-1992, the day of Zaklopača incident, witness and all Milići reserve police force were securing an area that had been de-blocked by the TO:D2944,para.30;T.33860-33861.</p>	<p><i>Contradiction</i></p> <p>Challenged on JNA involvement in the attack, testified he didn’t witness attack, only heard about it subsequently, and couldn’t say who committed it:T.33863.</p> <p><i>Contradiction</i></p> <p>Confronted with two contemporaneous SJB Milići police reports for 16-May-1992 providing that all police personnel were engaged in a “ciscenje” operation(P6127;P6128), stated report’s author “probably believed it to be a mopping up operation”, but maintained police were simply providing security along the road:T.33861-33862.</p>

Zoran JOVANOVIĆ	
<p>Claim contradicted by other reliable evidence</p> <p><i>Claim</i></p> <p>Pre-war ethnic structure of Vlasenica was 50/50 Serbs and Muslims:D3007,para.4.</p>	<p><i>Contradiction</i></p> <p>Confronted with official 1991 census showing 55% Muslims and 42% Serbs, claimed this was “done very randomly”:T.34204. Confronted with fact that he cited precisely the same census, for the same year, as support for his own witness statement, admitted citing it but replied incredibly that “I never recognised it and I never used it in my work as a journalist”, relying solely on previous censuses. Further challenged on his assertion regarding the 50/50 ethnic breakdown, responded that in his “mind” it has “always been 50/50”:T.34203-34205.</p>

<p>Muslims were held in Sušica for their own protection and he went there once to take supplies to some “friends”, who told him that it was “not that bad because no one was disturbing them”:D3007,para.29.</p>	<p>Confronted with Dragan NIKOLIĆ’s admission of responsibility before the ICTY for his personal involvement in killing, torture and sexual assault at Sušica, and asked to name which friends had told him it was not so bad, was unable to remember a single name:T.34207.</p>
<p>Other credibility/reliability issue</p>	
<p>Admitted when confronted that he was head of the DK information service and a DK war correspondent and propagandist:P6149;T.34194.</p>	
<p>As Radio Vlasenica manager announced on a post-1995 broadcast that MLADIĆ was a great man whose role in Bosnia’s war was to keep Islam from spreading across Europe. Acknowledged that “I still think that today”:T.34210.</p>	
<p>Co-authored a book entitled “Srebrenica, How it Really Happened”, and endorsed comments from the book’s foreword calling Srebrenica “a propaganda lie” and “NATO’s Auschwitz fake”, stating these comments were “close to my heart”, if not “the absolute truth”:T.34211-34212.</p>	
<p style="text-align: center;">Tomislav SAVKIĆ</p>	
<p style="text-align: center;">Claim contradicted by other reliable evidence</p>	
<p>Claim</p>	
<p>Was not member of the SAO Birač Assembly and doesn’t recall participating in councils and meetings dealing with political and ethnic issues in the region:T.33752-33754.</p>	<p>Contradiction</p> <p>Confronted with SAO Birač Assembly records evidencing him speaking at an Assembly session(P6112,p.4), his appointment to the SAO Birač Assembly Political Council(P6112,p.7), and his appointment to a team tasked with reviewing the ethnic map of the region(P6113), accepted he dealt with political and ethnic issues in the region but denied Assembly membership, maintaining he “may have sort of walked in”:T.33756-33759.</p> <p>Confronted with several documents confirming the existence of the Milići CS, claimed:</p> <ul style="list-style-type: none"> - 31-Mar-1992 Milići CS Decision evidencing witness as CS President(P6114) is forgery:T.33761-33763; - 27-May-1992 SJB report’s reference to “Milići Crisis Staff” being informed of an attack(P6115) was mistaken reference to “the communications centre at the miners’ hall”:T.33763; - 30-May-1992 decision on discontinuation of Milići CS(P6116) also a forgery:T.33764-33766.
<p>No CS was established or functioned in Milići:D2932,para.46.</p>	<p>Confronted with several documents confirming the existence of the Milići CS, claimed:</p> <ul style="list-style-type: none"> - 31-Mar-1992 Milići CS Decision evidencing witness as CS President(P6114) is forgery:T.33761-33763; - 27-May-1992 SJB report’s reference to “Milići Crisis Staff” being informed of an attack(P6115) was mistaken reference to “the communications centre at the miners’ hall”:T.33763; - 30-May-1992 decision on discontinuation of Milići CS(P6116) also a forgery:T.33764-33766.
<p>Unaware of the existence of Variant A/B:D2932,para.31.</p>	<p>Confirmed he was present at 46th and 50th Assembly but claims didn’t hear or perhaps he left the room when Variant A/B was discussed:T.33779-33781.</p>
<p>There can be no talk of the expulsion of Muslims from Vlasenica, and the SAO Birač government never</p>	<p>Confronted with 6-Jun-1992 <i>Javnost</i> article recording the SAO Birač Government’s decision on the “safe moving of Muslims from that</p>

<p>existed:D2932,para.36;T.33786.</p>	<p>area”(P6030), stated this was not the government’s position “but a poetic licence that the author took”:T.33786-33787.</p>
<p>On 11-Jul-1995 Muslim forces broke through at Bokčin Potok and crossed the road at Kaldrmica and Zuberi fighting, many fatalities on both sides:D2932,paras.89-91.</p>	<p>Shown 12-Jul-RDB report that large groups of Muslims left Srebrenica area on the night of 11/12 July(P4939), contradicting his statement that they were in the Kaldrmica and Zuberi area, said that’s what he was told:T.33797; Shown 11-Jul-1995 DK regular combat report indicating no combat around Konjević Polje and Nova Kasaba, five VRS casualties unrelated to that area(P6125) said: “[i]n Bokčin Potok, when crossing over, the Muslim formations were not fighting with the Army of Republika Srpska. Rather, they were fighting between themselves, because communications were down, and everyone knows that”:T.33799; Referred to BOROVIĆANIN 10-20-Jul-report showing on 12 July there was also no battle with heavy losses(P4960), and VRS GŠ report to KARADŽIĆ that in the DK AOR one VRS soldier was wounded(P3054,p.3). Told there were no Serb casualties caused by the Muslim column until 16 July, while on 13 July Serb forces were capturing thousands of Muslim civilians and soldiers, stated: “[h]e has no idea. Information on the breakthrough of the Muslim forces [...] on the 11th, I personally communicated that to MALINIĆ”:T.33800.</p>
<p>Other credibility/reliability issue</p>	
<p>Evidence on Zaklopača attack(D2932,paras.63-65) not based on personal knowledge, but rather hearsay account of witness Božidar TRIŠIĆ’s evidence:T.33788-33790.</p>	
<p>Asked by bench how he knew some of them were killed by Chinese LPGs, said it was an assumption, maybe they were killed by rifle grenades:T.33822.</p>	

<p>Milenko STANIĆ</p>	
<p>Claim contradicted by other reliable evidence</p>	<p>Contradiction</p>
<p>Claim Birač Autonomous District (AO) joined by Vlasenica on 26-Dec-1991 was not SAO:D2982,para.13;T.33994.</p>	<p>Confronted with: -minutes of the Executive Council session, signed by witness, referring to the “Serbian Autonomous District”(P6113), claimed this was due to inattentive secretary:T.33998-33999; -<i>Politika</i> article which records witness as SAO Birač Prime Minister saying in the event of an independent BiH its laws would not be accepted in Serb</p>

<p>Unable to recall decision of 4-Apr-1992 establishing Vlasenica CS and appointing him president, and not familiar with Variant A/B:D2982,paras.29,42.</p>	<p>houses(P6136), denied this was his position, but accepted he made the statement:T.33999-34000.</p> <p>Confronted with 4-Apr-1992 decision, taken “Following instructions from the Main Board of the BH SDS regarding operations under conditions of imminent threat of war”(P6121), claimed this was a municipal secretariat document rather than an SDS document:T.34003-34005. Admitted when challenged that heard about the contents of Variant A/B, but claimed—despite being a prominent SDS member—he was very busy in the Municipal Assembly building and didn’t have time for party matters, accepting however, that “I suppose they invoked a certain document when adopting this decision”:T.34005-34006.</p>
<p>Doesn’t recall CS meetings before 21 -Apr-1992:D2982,para.29.</p>	<p>Confronted with several Vlasenica CS decisions issued at its 19-Apr-1992 meeting to:</p> <ul style="list-style-type: none"> -introduce imminent threat of war(P6137), -disarm SJB active and reserve forces(P6138), -take over power in Vlasenica municipality(P3214), <p>claimed the dates are wrong; some CS documents were drafted in the municipal secretariat while he was not present(T.34007); the stamp is wrong, the documents unsigned, and they were “planted by some services”(T.34008-34009); and—despite the clear terms of the decision to take over power(P3214)—maintained the CS met only after the take-over:T.34010-34012. Made vague and outlandish assertion in re-examination that “[c]ertain forces which I assume have something to do with corruption [...] and who are probably in cahoots with the Prosecution are producing these false documents”:T.34046.</p>
<p>The 1st Vlasenica Light Infantry Brigade report stating the SDS and CS were involved in the armed takeover of power in Vlasenica(P2636) is “a completely false document”:T.34017-34019.</p>	<p>Confronted with 19-Apr-1992 CS decision on establishing a TO Staff, corroborating the 1st Vlasenica Brigade report(P6140), claimed “this also is one of those false documents”:T.34019-34020.</p>
<p>The SAO Birač authorities were not involved in moving out of population:T.34022.</p>	<p>Confronted with:</p> <p>-31-May-1992 VRS Birač Brigade order regulating the moving out of the Muslim population from the area pursuant to the decision of the SAO Birač government(P3240), maintained there was no SAO Birač government, and no such decision:T.34022-34024;</p>

	<p>- 6-Jun-1992 <i>Javmost</i> article regarding SAO Birač Government decisions(P6030), implicitly accepted there was such a government decision by confirming the first part of the article, but claimed the government decision on the “safe moving of Muslims from the area” was “probably the position of the journalist who reported on the events in his own way”:T.34024.</p>
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Božidar TRIŠIĆ

Claim contradicted by own statement

Claim

Police were not involved in the Zaklopača attack on 16-May-1992:D3048,para.26.

Contradiction

Confronted with evidence of several attack survivors who saw police cars in Zaklopača that day, accepted there could have been police cars without him personally seeing them:T.34505-34507. Stated on re-examination that not everyone who entered the village would have had to pass him:T.34509.

Other credibility/reliability issue

Never went to the upper part of the village where the attack took place:T.34504. Accepted his evidence relating to the spontaneous and unplanned nature of the Zaklopača attack, as well as the possible motivation behind it(D3048, paras.23;27) was just a guess since he had no knowledge as to who the attackers were:T.34507-34508.

Vogošća

Nikola POPLAŠEN

Claim contradicted by own statement	
Claim	Contradiction
KARADŽIĆ was not an authoritative leader and could not entrench his authority at the required level:D4027,para.21.	Accepted his previous testimony that KARADŽIĆ 's influence was important and decisive as he was both RS and SDS President, which had absolute power:T.43588-43589. Denied Jovan TINTOR's statement: "I went from municipality to municipality and created military formations on order from my President"(P970,p.298) was an example of KARADŽIĆ making his authority felt at local level:T.43595.
Civilian authorities did not have any military competence:T.43595.	Confronted with KARADŽIĆ 's statement that the SDS organized the people, set up the TO, and led the army(P970,pp.316-317), stated it was the SDS's duty, as part of the authorities, to organise the TO:T.43597-43598.
CS and War Presidencies had no role in planning the persecution of the non-Serb population:D4027, para.6.	Limited this broad statement to his experience in Vogošća:T.43606-43607.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Restrictive measures in RS were applied to everyone regardless of ethnic affiliations:D4027,para.15.	Confronted with Čelinac War Presidency decision imposing restrictive measures on non-Serbs only(P2638), denied this was discriminatory:T.43602. Further questioned, limited his broad statement to Vogošća:T.43605.
Vogošća had no electricity from the first armed clashes through the middle of 1993:D4027, para.7.	Confronted with Rajko KOPRIVICA's-Jun-1992 statement that he listened to the radio and could watch TV(D4028,p.6) and a November 1992 notice requesting citizens of Vogošća to limit their consumption of electricity to avoid power cuts(P6511), conceded there were generators, batteries, and some power by November 1992, but maintained he was "there all the time" and knew "with certainty" there was no electricity/hot water:T.43617-43618. Further confronted with his previous testimony that he was actually rarely in Vogošća(T.43618-43619), implicitly changed his evidence, accepting his previous testimony was accurate.
Other credibility/reliability issue	
Proclaimed as "Chetnik Vojvoda" in 1994 and later removed from RS President's office by OHR:T.43587-43588.	

Svetozar STANIĆ	
Claim contradicted by own statement	
Claim	Contradiction
Vogošća CS was established on the basis of the Law on All People's Defence and Social Self-Protection:D2678, para.8:T.31669.	Admitted Vogošća CS was established in accordance with Variant A/B:T.31669-31670.
The list of "citizens of Muslim ethnicity" captured in Svrake to be released for exchange(P2367) were members of the Patriotic League, a paramilitary unit:T.31696.	Later stated did not know the people listed, they were detained to see who they were, whether they were members of the paramilitary unit or not, and if they were not, they were exchanged:T.31698.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Jovan TINTOR was Vogošća CS President and a Main Board member and did not organize any military brigades:T.31676.	Confronted with KARADŽIĆ 's statement that TINTOR put himself at the head of an illegal brigade to oppose the Green Berets(P970,p.317), claimed the "crisis staff" had issued guidelines for mobilisation:T.31676-31677.
Muslim majority communities were left alone:T.31681.	When shown notes of a meeting he chaired, stating that they took 80% out of 30% of the territories and have to clean up Kobilja Glava (a Muslim community) and liberate it(P5511,p.2), responded they did not take or conquer anything and there were no discussions about taking Kobilja Glava:T.31680-31683.
Although Vogošća was a Muslim-majority municipality, Serbs did not "take" the industry in Vogošća but "protected" it:T.31679-31680.	Chaired meeting(P5511) at which KRAJIŠNIK stated in the beginning the opinion was to take Vogošća because of its industry:T.31680.
Never knew that the Bunker in Vogošća was used as a detention facility:T.31687.	Attended meeting a few meters from the Bunker together with AVLIJAŠ at which the Bunker was discussed:S.AVLJAŠ:T.35159-31561.

Zvornik

Branko GRUJIĆ

Claim contradicted by own statement	
<p>Claim</p> <p>Proceedings against all of the paramilitaries arrested on 29-Jul-1992 were held before relevant courts in RS and Serbia:D3724,para.42.</p> <p>KARADŽIĆ was visibly surprised and astonished by what witness told him about paramilitaries in Zvornik at the beginning of July:D3724,para.41.</p>	<p>Contradiction</p> <p>Admitted when confronted that the paramilitaries spent only a few days in prison in Bijeljina before being released:T.40391-40392.</p> <p>Confronted with:</p> <ul style="list-style-type: none"> -prior OTP statement that he and VASILJIĆ went to inform KARADŽIĆ about the paramilitaries on the day the JNA left and KARADŽIĆ told him he had heard about these incidents and would sort them out(P6414,pp.7-8); -Belgrade Court statement that he and VASILJIĆ visited KARADŽIĆ around 20-Jun where KARADŽIĆ said he knew all about ŽUČO, and that ŽUČO was his responsibility(P6415,pp.7-8) -fact that at the 30-Jun-1992 meeting, GRUJIĆ and others informed KARADŽIĆ of problems the paramilitaries were causing, and KARADŽIĆ was already aware of their criminality(P1478,p.270), changed his story yet again, claiming he visited KARADŽIĆ at the end of July, two or three days before the paramilitaries were arrested, insisting this was the first KARADŽIĆ heard about the problems with the paramilitaries:T.40426-40427,T.40430.
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Muslims were not evicted by the authorities and KARADŽIĆ was not involved in the decision to move Muslims out of Kozluk and settle Serbs there:D3724,para.72;T.40418.</p>	<p>Contradiction</p> <p>Confronted with his 30-Jun-1992 statement to KARADŽIĆ and MLADIĆ “We have 32,000 Serbs. We have successfully implemented the President’s decision to settle Divič and Kozluk with our children” and PAVLOVIĆ’s statement “We were most active in evicting the Muslims”(P1478,pp.249-250,253-254), denied them, suggesting MLADIĆ was drunk or mistaken or MLADIĆ’s diary was a forgery:T.40420-40421.</p>
<p>Only learned of the fate of the Muslims in Čelopek Dom Kulture during his trial in Belgrade or in ICTY interviews:D3724,para.49.</p>	<p>[REDACTED]</p>

Other credibility/reliability issue	
	Belgrade District Court found witness's account of events in relation to Kozluk, Divić and Djulići to lack credibility and convicted him and PAVLOVIĆ for their role in the unlawful imprisonment of Muslims from Divić, the unlawful imprisonment of Muslims from Djulići, and the forcible displacement of the Muslims from Kozluk:P6416.
	Made patently incredible claims e.g. When he spoke to Zvornik SDA president JUSBASIĆ in early 1992, JUSBASIĆ told him the US had decided to create an Islamic state in Europe and to assist IZETBEGOVIĆ in so doing, in order to achieve the US's global objective for Europe which was to slow down the creation of a united Europe:D3724,para.22. See also D3724,para.69.
	Repeatedly resiled from his prior OTP statement, claiming things had been omitted or badly translated from the tape recording(e.g. T.40363;T.40374;T.40375). Claimed OTP investigators behaved inappropriately, despite record of him thanking OTP investigators for their fair-treatment:T.40375-40376.
	Repeatedly resiled from statement in own trial(e.g. T.40369-40371;T.40383). Refused to confirm he spoke the truth when he gave statement in his defence at his own trial:T.40405-40408.
	Gave interview to <i>New York Times</i> on 7-Mar-1994 in which he made multiple Serb nationalist statements, including that Zvornik was being reclaimed as Serbian land forever, that CLINTON should abandon the Muslims and return to his true Christian allies, and that the Muslims would never return to Zvornik:P6417.

Jovo IVANOVIĆ	
Claim contradicted by own statement	
Claim	Contradiction
After Zvornik takeover, Zvornik leadership had almost no contact with the Pale leadership:D3692,para.25;T.39897-39898.	Confronted with prior statement, in which he repeatedly stated he didn't know what communications existed between Zvornik municipality and Pale after the takeover(P6403,pp.5-6), accepted he didn't know what road communications there were:T.39873.
There was anarchy in Zvornik after the takeover, with ARKAN and the paramilitaries exercising power:D3692,paras.24-28.	Confronted with evidence of the command and control over the paramilitaries, stated he was not a "relevant witness" for events following the Zvornik takeover, during which period he was not part of the authorities. In particular, said he "shied away from the municipality, army, paramilitaries et cetera":T.39866,T.39868.
Only after the paramilitaries had been arrested were many crimes committed by them discovered:D3692,para.28.	Upon cross-examination confirmed his own knowledge of killings at the Karakaj Technical School and Čelopek Dom Kulture within days of those events:T.39875-39878.

Other credibility/reliability issue

Repeatedly denied his earlier statements, e.g. first denying he made a statement, then claiming he had signed his statement without reading it, then ultimately accepting he had made the statement:T.39861-39862. See also T.39844-39849.

By his own admission unreliable: denied the truth of a previous statement about GRUJIĆ stating he was trying to take revenge on GRUJIĆ, explaining “if two Serbs quarrel, then rest assured that they will try to lie. One will try to lie about the other one”:T.39881-39882.

KW-317	
Claim contradicted by own statement	Contradiction
<p><i>Claim</i></p> <p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>First opportunity to speak to KARADŽIĆ was in August:T.39371.</p>	<p>Admitted that prior to August 1992, he had sent KARADŽIĆ and KRAJŠNIK information through deputies SIMIĆ and MIČIĆ:T.39374.</p>
<p>Did not speak to KARADŽIĆ about the detentions and killings in Čelopek:T.39379-39380,T.39382.</p>	<p>[REDACTED] claimed did not talk to KARADŽIĆ at that point in time:T.39376-39377.</p> <p>[REDACTED] maintained that first saw KARADŽIĆ and KRAJŠNIK face-to-face in August 1992:T39382.</p>
Other credibility/reliability issue	
<p>attended:T.39329, but see [REDACTED]</p>	<p>Claimed not to remember meeting which he previously confirmed he [REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>

Marinko VASILIĆ	
Claim contradicted by own statement	Contradiction
Claim Didn't hear about KTS, Gero's Slaughterhouse or Čelopek killings until he left police, after the arrest of the paramilitaries, months after they occurred:T.39940-39943,T.39952.	Confronted with prior statement that he heard about the killings at KTS and Gero's Slaughterhouse immediately after the events had taken place and it was "the rumour of the town"(P6405,pp.4-5), claimed this was a "mistake":T.39941. Confronted with report of Zvornik SJB inspection between 29 May and 12 June, a period during which witness was either most senior or second most senior police official, which states that paramilitary groups were killing Muslims(D1436), accepted he knew paramilitaries were killing Muslims:T.39949-39953.
The paramilitaries were so strong that local authorities and policemen could have no influence on them whatsoever:D3693,para.34.	Accepted when confronted that GOGIĆ's men were brought in when Milos PANTELIĆ was police chief, they wore police uniforms and were paid by the municipality, and PANTELIĆ stated they were under his control and reported exclusively to him:T.39945-39947.
Claim contradicted by other reliable evidence	Contradiction
Claim In mid-July 1992, witness and GRUJIĆ went to Pale to inform the leadership about the situation in Zvornik and GRUJIĆ told the witness that KARADŽIĆ was "visibly surprised" by the situation in Zvornik:D3693,paras.40-41.	Confronted with fact KARADŽIĆ and MLADIĆ met with Zvornik authorities, including him, on 30-Jun-1992, at which meeting KARADŽIĆ was informed of problems the paramilitaries were causing, and KARADŽIĆ was already aware of their criminality(P1478,pp.246,250,270), first claimed didn't attend meeting(T.39957), then accepted complaints were made about the paramilitaries at this meeting:T.39960.
Paramilitaries so strong that police and other authorities ran away from them in fear for their lives:D3693,paras.34-35.	Confronted with his statement to KARADŽIĆ and MLADIĆ at 30-Jun-1992 meeting that "[s]ecurity conditions are at a satisfactory level"(P1478,p.272), denied making this statement:T.39962-39963.
Other credibility/reliability issue	
Persistently evasive and refused to adopt previous statements:T.39921-39929,T.39932-39936,T.39940-39943.	
Čedo ZELENVIĆ	
Claim contradicted by own statement	Contradiction
Claim IT-95-5/18-T <i>Confidential</i>	

<p>On 6 April, ARKAN asked GRUJIĆ and Zvornik authorities for assistance and they refused him because they were trying to resolve things in a peaceful way:D3723,para.24;T.40314-40315.</p>	<p>Confronted with evidence of Serb authorities' support for ARKAN, witness stated that authorities "genuinely saw in ARKAN a force that would establish a balance from the Serbian side in order to resolve things in a peaceful way":T.40324-40325. Further contended that in beating up the Serb negotiators in front of the Muslims in Mali Zvornik, ARKAN wanted "to make a show of force or [...] compel the other side to find a peaceful solution to these problems":T.40341.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p><i>Claim</i></p>	
<p>ARKAN took over all the power and commanded his forces in the operation to lift the blockade of Zvornik, joined by people from Serbia and Croatia:D3723,para.26.</p>	<p><i>Contradiction</i> Confronted with Serbian MUP 1992 Annual Report stating "SJB personnel, acting together with forces of the Serb TO entered Zvornik and took hold of the town's vital facilities on 8-Apr-1992"(P3390,p.22), first denied the SJB took part in the takeover operation, then stated: "I wasn't doing any counting and I didn't look at who was participating":T.40326-40327.</p>
<p>Paramilitaries seized power in the town and made all the decisions based on their fighting strength and power, which was why local authorities could not stand up to them:D3723,para.30.</p>	<p>Confronted with evidence of the authorities' support for paramilitaries(P2867), contended that GRUJIĆ was coerced into providing support:T.40330-40331. Confronted with GRUJIĆ's 6-Jun-1992 letter to the republican authorities requesting additional money to pay the TO(P2913), with no mention of these payments being coerced, contended GRUJIĆ was afraid to put complaints about the paramilitaries on paper:T.40330-40332.</p>
<p>Other credibility/reliability issue</p>	
<p>Repeatedly emphasised his lack of involvement in and knowledge of relevant events:T.40318-40321;D3723,para.28;T.40328;T.40336-40337.</p>	

Non-Indictment Municipalities

Gojko KLIČKOVIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>Denied Bosanska Krupa SDS adopted instructions for the work of the SDS party in the municipality pursuant to Variant A/B:T.46861.</p> <p>Muslims were only evacuated from Serb-claimed parts of the municipality temporarily and/or voluntarily and would return after combat operations ended:D4313,para.13;T.46869,T.46873.</p>	<p>Previously confirmed this to OTP:T.46860-46861;P6662,pp.32-33.</p> <p>Told Banja Luka TV the “arrival of any Muslim formations or Muslim population to this area is not a possibility any longer. [...] there is not even a possibility of co-existence and let alone us living together.” Admitted this statement reflected his view at that time:P6665;T.46876-46877.</p>
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Muslim civilians were temporarily moved from the zone of combat operations. As soon as the situation calmed down they would return to their homes. P2737 reflects this temporary relocation:D4313,para.13.</p> <p>A few days after 16th Assembly, ordered the evacuation of the remaining Muslim population from the Serbian Municipality of Bosanska Krupa at the request of the Muslims themselves:T.46869.</p> <p>Did not propose the cleansing and destruction of property along the Una’s left bank in an effort to establish a border on the Una in accordance with the strategic objectives:T.46871.</p>	<p>Could not plausibly explain how an order to selectively remove Muslims from a mixed Muslim/Serb area(P6663;T.46862-46865) could be about removing people from a combat zone for their own safety. Claimed “the Muslims felt threatened where they were surrounded by Serbs” and this evacuation was at their own request:T.46865-46867. Confronted with Miroslav VJEŠTICA’s 16th Assembly statement that Muslims from the Una’s right bank had been evacuated and would not likely return due to the “happy news” that the Una is the border, contradicted the speech’s plain words and claimed “statements can never be the official position of the policy.”:T.46868.</p> <p>Confronted with his written order for this evacuation, stating as reasons that the political situation is becoming more complex, and that “no personal or collective safety can be guaranteed to the Muslim population if the war escalates”, while saying nothing about any Muslim evacuation request, claimed that, due to regulations governing the document’s contents, he could not refer to such requests in the document:T.46870.</p> <p>Confronted with his 25-May-1992 proposal to cleanse and “destroy [...] as many residential and other buildings as possible” for stated reasons including the “[p]olitical determination to have the border [...] established along the river Una”(P2616), continued to deny his proposal was connected to efforts to</p>

<p>Purporting to illustrate KARADŽIĆ's generous, democratic nature and conciliatory approach to non-Serbs, stated that KARADŽIĆ "often cited Njegoš to us [...] repeating [...] A timid chief has no business ruling":D4313,para.6.</p>	<p>establish a border on the Una and provided incoherent explanation, focusing on the irrelevant point that this was a non-binding proposal:T.46872-46873.</p> <p>Confronted with extracts from the poem in question ("Mountain Wreath"), celebrating the mass killing by Montenegrins of Montenegrin Muslims and destruction of their homes and mosques, refused to acknowledge this was the poem's subject, claiming he did not study the Mountain Wreath, and was not interested in it:T.46877-46882;P6666. In re-direct, gave detailed evidence on it, naming several characters, describing its subject-matter and interpreting specific passages; acknowledged "it was mandatory reading at school":T.46889-46892,46897-46899.</p>
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Sveto KOVAČEVIĆ

Claim contradicted by own statement	
<i>Claim</i>	<i>Contradiction</i>
<p>Was SDS Main Board member and familiar with the SDS's workings and the positions taken and decisions issued by the Main Board and the party:D4194,paras.6,7,9,12,15,37;T.45160.</p>	<p>In his 2003 OTP interview(P6580,pp.3-4), could not remember anything specific about the SDS Main Board meetings, and was not able to describe the Main Board functions within the party:T.45160-45162.</p>
Claim contradicted by other reliable evidence	
<i>Claim</i>	<i>Contradiction</i>
<p>Muslim population remained in Čelinac throughout the war:D4194,para.29.</p>	<p>Confronted with Banja Luka RDB document comparing the 1991 Muslim population (1440) with the 1995 population (190)(P5449), agreed Muslims left, but claimed it was to be "schooled" and other reasons including "natural selection", going on to claim document was not "valid":T.45138-45139.</p>
<p>Perpetrators of crimes against non-Serbs (SUGIĆ brothers) were arrested immediately, brought to trial and sentenced to 18 years' imprisonment:D4194,paras.16,17,28.</p>	<p>Confronted with a series of documents showing that the brothers were released in February 1993(P6578); requests for their release included one from the Čelinac Executive Board(P3610,P3611,P3612); and only in 2002 was Obrenko ŠUGIĆ convicted and sentenced to 15 years' imprisonment for this crime(P6578), witness stated he had learned only later of their release and re-arrest, but could not be sure about the details:T.45145-45150.</p>
<p>CS was independent and did not take any instructions:D4194,para.23.</p>	<p>Confronted with ĐERIĆ's 26-Apr-1992 instructions for the CS's work(P3459), and witness's signed and stamped 13-May-1992 decision repeating ĐERIĆ's words(P6579), continued to deny following the instructions:T.45151-45153.</p>

Miloš MILINČIĆ	
Claim contradicted by own statement	Contradiction
<p>His entire witness statement was his own words:T.44970.</p> <p><i>Claim</i></p>	<p>Praise of KARADŽIĆ in statement(D4187,para.22) was identical to previous witness Dragomir LJUBOJEVIĆ's statement:D3144;P6565. Confronted with this(T.45970-45972), indicated that in fact someone else wrote his statement: "The essence of my statement and the person who drafted it is identical [...]. The author looked at the contents of my statement and Ljubojević's statement, provided this definition. [...] the author of this text, when he was listening to me and Ljubojević, he provided his own wording.":T.44979-44980. The next day, again claimed statement was all his original words:T.45005.</p>
<p>The investigation of STANKOVIĆ, murderer of HADŽISELIMOVIĆ, showed how well the Srbac authorities responded to the murder of a prominent Muslim:P6564,pp.125-126;T.44961-44965.</p> <p>Other credibility/reliability issue</p>	<p>STANKOVIĆ murdered HADŽISELIMOVIĆ in May 1992, murdered two more Muslims and seriously injured two others in August 1992, then in September 1994 shot two Serb children and was finally put in prison until approximately 2002:P6564,pp.140-141;T.44966-44967.</p>
<p>Confronted with his call to take hostages like the Ayatollah Khomeini did in Iran:"It shook America quite well. Well, we also have enough of those white men or the others and [that] can be used as our weapon"(P921,p.80), insisted this was "taken out of context" and he merely meant "let's bring them in by force and they will come to pick them up" and "we'll talk to them" and say "hey people, we don't want war.":T.44993-44994.</p>	<p>Confronted with his call to take hostages like the Ayatollah Khomeini did in Iran:"It shook America quite well. Well, we also have enough of those white men or the others and [that] can be used as our weapon"(P921,p.80), insisted this was "taken out of context" and he merely meant "let's bring them in by force and they will come to pick them up" and "we'll talk to them" and say "hey people, we don't want war.":T.44993-44994.</p>
Božidar VUČUREVIĆ	
Claim contradicted by own statement	Contradiction
<p>No property was destroyed in Trebinje: [REDACTED], T.35992.</p> <p><i>Claim</i></p>	<p>[REDACTED]</p>
<p>There were no inter-ethnic conflicts in Trebinje:T.35992.</p>	<p>Confronted with a transcript of own interview stating "they left singing in the buses"(P6225), described organized departure of Muslims as "very joyous" compared to fate of Serbs in Sarajevo:T.35980.</p> <p>Confronted with own interview, saying, "to have anything to do with the Muslims is like dealing with the devil himself. [...] This is a civilisational war. This miserable Islam, this civilisation of theirs is about to explode. The way</p>

	they breed, you cannot even count them.”(P6226), denied saying that:T.35999-36000.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Muslims left Trebinje voluntarily on SDA orders:T.35941-T.35942,T.35964,T.35973.	Confronted with account of Muslim refugees from Trebinje who describe persecution and deny acting on SDA instructions(P6222), admitted he told Muslims he could not guarantee their safety:T.35960-35964. <i>See also</i> [REDACTED].
Other credibility/reliability issue	
Did not recall remarks included in Defence witness statement, casting doubt on his memory or authorship of the statement:T.35983-35984.	
Evasive on incriminating interview(P6226): claimed the Bosnian Serb newspaper was in a “media war” against him, the article was “apparently doctored,” the conversation “never happened”:T.35993-35996. Claimed same thing about another incriminating interview:P6227;T.36003-36004.	
Confirmed he said “we will build an older and more beautiful Dubrovnik” but claimed was just a joke in reaction to a Croatian statement:T.36007.	

Sarajevo

Željko BAMBAREZ

Claim contradicted by own statement	
<p>Claim</p> <p>Photograph 1D8543 “show(s) the Osmice feature as well as the view of the city and Breka from that feature. I think it would be impossible to see a tank at such a distance with the unaided eye”:D2622,para.7.</p>	<p>Contradiction</p> <p>Shown 1D8543 in cross-examination, stated, “[t]his picture is so unclear, so foggy. I cannot discern anything. I don’t even know where it was taken from. But it is so unclear, the picture.” Denied seeing it before, then admitted receiving it along with his witness statement, but claimed he could not comment on it:T.31314. Asked by the Chamber to reconcile his written statement with his in-court claim that he could not comment on this photo, stated that he had seen the photograph before but had not commented on it. The Chamber consequently struck the photograph from the admitted associated exhibits:T.31315-31316.</p>
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>The 1.Smbr did not have any tanks stationed in the area of Zlatište or Osmice:T.31312.</p>	<p>Contradiction</p> <p>Confronted with May 1995 SRK document referring to “fire support” for the 1.Smbr including “two T-55 tanks from the area of Zlatište and Vraca”(P5941), qualified his previous testimony, stating he could only speak about the time he was at Zlatište, and was not there at the time and could not comment:T.31313-31314.</p>

Prvoslav DAVINIĆ

Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Claimed that the report UNPROFOR Command officially submitted to the UN on G19 had allowed political considerations to outweigh other factors in the investigation:D4217,paras.6-8.</p>	<p>Contradiction</p> <p>Admitted he knew nothing about the extent, nature and findings of the multiple technical analyses for G19 and that his assertions were based on the comment of an unnamed colleague:T.45524-45526.</p>
Other credibility/reliability issue	
<p>Admitted that, even though he was a senior-level UN official, his last two meetings with KARADŽIĆ (including one at KARADŽIĆ’s home where the witness wished him well) were when KARADŽIĆ was under indictment and in hiding:T.45508-45511.</p>	

Claimed in 2004 when he was Serbian Defence Minister that MLADIĆ was not on Serbian territory:T.45531. In spite of his position, witness denied knowing at the time, and even to this day, that MLADIĆ was being moved around Belgrade by VJ transport:T.45531-45533.

Asked repeatedly whether he was aware, during his first meeting with **KARADŽIĆ** in witness's UN office in New York in 1993, that UNSC had recently condemned Serb restrictions on humanitarian aid and attacks on civilians, witness was highly evasive (e.g., "I did not follow it officially. If I followed it privately, maybe I followed, maybe I did not"):T.45515-45516. Complained his words were being "twist[ed]", which was rejected by the Chamber, and ultimately claimed he did not remember and may or may not have known:T.45516-45517.

Andrey DEMURENKO	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>Witness based his investigation of the areas on the Serb side from which the G19 mortar might have been fired on firing table for an M52 120mm mortar, which lists distances for each charge:D2270,para.92;D1010;T.28949-28950.</p>	<p>Confronted with the fact that he didn't know whether the M52 fired more than one type of shell(T.28952), agreed had ignored whether the system fired two different shells but suggested that the differences between the two were "not great":T.28954. Confronted with the M52 firing table, which revealed a difference of over 1 km between the M49 and M62 shells at charge 6, conceded that he didn't know which kind of shell was used:T.28956-28958.</p> <p>Conceded it was generally correct that he "had no basis" for asserting an M52 was used, given that the VRS also possessed M74 and M75 mortar systems(T.28958-28959;P5919). Confronted with firing tables revealing the difference between the locations was potentially greater than 1.5km, agreed this was "perfectly right"(T.28959) but claimed it made no difference because "we checked everything"(T.28960), contradicting his original assertion that his investigation was based on the M52 firing table.</p>
<p>Where the mortar had been placed didn't matter because every possible location had been checked:T.28960. Witness explored the "gigantic area, the entire slope of that mountain, thousands of square meters":T.28927.</p>	<p>Apart from the facial absurdity of this claim, confronted with his previous <i>D.Milošević</i> testimony where he repeatedly emphasized the precision of the "exact" locations he visited or checked ("the very spot from which this shell was allegedly fired")(T.28927), when the <i>D.Milošević</i> Chamber questioned his reliance on the alleged precision of his locations, and asked how he could exclude that "the mortar could not have been fired even from an area adjacent to the place where you were?"(T.28930), he further underscored the alleged precision: "It's the science of physics. We cannot go beyond that. If you take a certain line of fire, only six possible firing points exist depending on the charges used. We photographed an area of 20, 30 square meters":T.28930-</p>

<p>The <i>D.Milošević</i> Chamber confused the margin of error for where a shell may land with the deviation of error for a potential firing site(D2270,paras.121-122), thus were wrong to find him “vague and evasive” when addressing the contention that he “confined himself to too narrow an area”:T.28922.</p>	<p>28931. Confirmed this inconsistent testimony, saying “had I covered the map with my hand and said that I investigated this entire area, it would not have sounded convincing”:T.28928.</p> <p>Refused to stand by his evidence, testifying that he could not doubt the conclusions of the <i>D.Milošević</i> Chamber:T.28923. When the Presiding Judge asked what he meant by his assertion that the <i>D.Milošević</i> Chamber was confused, witness first stated that it was difficult to recall his “level of understanding” five years ago and, when reminded that this assertion was from his recent statement said, “[i]t’s difficult for me to judge the basis on which high court made its conclusions”:T.28935.</p>
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Luka DRAGIČEVIĆ

Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Claimed that the village of Gojčevići, which he ordered to be set on fire(P6047), had no inhabitants and only three houses:T.31443.</p>	<p>Contradiction</p> <p>Witness’s own report describes having “liberated” the village(P6048), and the 1991 census gives a population of 48(P6049), which the witness agreed would represent more than three houses:T.31445.</p>
<p>Testified in <i>D.Milošević</i> that in 2006 he heard for the first time that air bombs “had been launched from the ground. I wasn’t familiar with that kind of weapon or the mode of its use, and I still don’t know anything about it. That’s when I heard for the first time that this bomb was being launched from the ground.”(T.4074;T.31449-31451.</p>	<p>Confronted with his own order to the Igpbr and Idžpbr to prepare airbomb launchers, load four airbombs onto vehicles and suggesting SRK Command deploy the 3.Spbr launcher, positioned in Trnovo, for activities from the direction of Lukavica(P6051), claimed “I don’t know whether it was to be launched from the ground or from elsewhere” suggesting that he had to sign this order regardless of his understanding of its contents:T.31453. After acknowledging that airbombs could not have been dropped from aircraft due to the no-fly zone, and asked where else airbombs could be launched from, attempted to distinguish a launch from the ground versus a launch from a lorry and finally made the astonishing claim that air bombs could have been launched “from a platform on the sea or on the river surface”:T.31454-31455. When it was put to him that he did not tell the truth when he previously testified that he first learned of air bombs being launched from the ground in a 2006 interview, witness responded that he “never saw any launchers” but avoided answering the question:T.31458-31459.</p>
Other credibility/reliability issue	

When asked whether “Turks” meant “Muslims” in an order stating “[t]he Turks must disappear from these areas”(P1645), the witness responded: “Well, most probably Muslims. That was the usual, or rather, frequent not usual name used for Muslims”:T31448.

Velimir DUNJIĆ	
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Unaware of the criminal reputation of the paramilitary groups under his command, such as the unit of Branislav GAVRILLOVIĆ:T.30489-30490.</p>	<p>Contradiction</p> <p>Confronted with evidence showing: local complaints of crimes committed by these groups pre-dating his arrival in command(D1080;T.30490-30491); Iliđža SJB statement that GAVRILLOVIĆ’s unit was involved in thefts and looting on their territory(P2296,para.74;T.30496-30497); GALIĆ’s awareness that “a paramilitary formation [...] commanded by Branislav Gavrilovic [...] is a group of criminals whose behaviour is damaging the reputation of the [VRS] in the eyes of the population”(P2303;T.30506-30508); and SRK Corps Command report identifying DUNJIĆ as “the main organiser of paramilitary formations” in his zone of responsibility, that he supplied those formations with arms and munitions, and that he personally arrested members of the SRK Corps Command using members of GAVRILLOVIĆ’s unit who perpetrated crimes during the episode(P6005;T.30509-30512). Admitted he had arrested SRK Corps Command officers using members of GAVRILLOVIĆ’s unit, but denied knowing about crimes and suggested that the author of the document was biased(T.30511-30513), or that GALIĆ’s knowledge of the paramilitary group’s criminal reputation was simply a difference of opinion, “like assessments of ice skating where you say artistic impression”:T.30507.</p> <p>Confronted with contemporaneous TOLMIR document calling the “Wolves” and others “paramilitary formations” containing convicts and “pathological criminals”(P2855;T.30544-30545), derisively responded that the document “will provoke laughter first and then disappointment” from the Wolves, and that they “cannot be classified as a paramilitary unit, irrespective of this document”:T.30545-30546.</p>
<p>Testified that paramilitary units “in the heads of many officers of the former JNA, were paramilitary only because they were called Vučjak, wolves, and other names. By the same analogy, the Deltas and the Seals are also paramilitary formations. Those how those people reasoned, due to ideological differences, whereas I was not interested in any ideological differences”:T.30505. When asked whether someone who had a more objective perspective, who was not burdened by ideological differences may not consider, for example, BRNE’s unit as paramilitaries, answered: “Yes, you understood me perfectly well”:T.30544.</p>	

Milorad DŽIDA	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>Informed about G8 by brigade command on afternoon of 5-Feb-1994, and that a mixed commission would carry out an on-site investigation that same day or the following day:D2375,para.16. On 6 February, between 0900 and 1000 hours, representatives of the VRS GŠ, SRK, UNPROFOR and 1.Rpbr came to inspect firing positions:D2375,para.17.</p>	<p>Contradicted by late additions to his statement, indicating that an UNPROFOR commission came to inspect brigade's mortars two or three days after G8, and that the brigade command informed him of the impending visit only half an hour in advance:D2375,para.29. Pressed on the clear contradiction in his statement, stated: "Maybe this was erroneously transcribed. I don't know"(T.29574), despite having admitted that the first version of his statement (which included D2375,paras.16-17) had been based on a transcript of his interview and "accurately reflected what I said":T.29571-29572.</p>
<p>"The firing positions of the 120-mm and 82-mm MB battery were in the sector of Debelo Brdo (three pieces) and Mrkovići (three pieces)":D2375,para.15. Repeatedly questioned based on the assertion that there were three mortars in each location(T.29577-29578), and confirmed that in each location, two mortars were 120mm and the other was 82mm(T.29578), marking their locations on a map:P5952.</p>	<p>In another added paragraph to his statement, changed his initial evidence, saying there were four mortars in his unit, not six:D2375,para.28. Confronted with the inconsistency, replied "I left out one 82-millimetre, probably by mistake"(T.29579), finally stated there were a total of eight mortars:T.29579,29614-29615.</p>
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Informed about G8 by brigade command on afternoon of 5-Feb-1994, and that a mixed commission would carry out an on-site investigation that same day or the following day:D2375,para.16. On 6 February, between 0900 and 1000 hours, representatives of the VRS GŠ, SRK, UNPROFOR and 1.Rpbr came to inspect firing positions:D2375,para.17.</p>	<p>Contradicted by late additions to his statement, indicating that an UNPROFOR commission came to inspect brigade's mortars two or three days after G8, and that the brigade command informed him of the impending visit only half an hour in advance:D2375,para.29. Pressed on the clear contradiction in his statement, stated "[m]aybe this was erroneously transcribed. I don't know"(T.29574), despite having admitted that the first version of his statement (which included D2375,paras.16-17) had been based on a transcript of his interview and "accurately reflected what I said":T.29571-29572.</p>
<p>Informed about G8 by brigade command on afternoon of 5-Feb-1994, and that a mixed commission would carry out an on-site investigation that same day or the following day:D2375,para.16. On 6 February, between 0900 and 1000 hours, representatives of the VRS GŠ, SRK, UNPROFOR and 1.Rpbr came to inspect firing positions:D2375,para.17.</p>	<p>Contradicted by late additions to his statement, indicating that an UNPROFOR commission came to inspect brigade's mortars two or three days after G8, and that the brigade command informed him of the impending visit only half an hour in advance:D2375,para.29. Pressed on the clear contradiction in his</p>

hours, representatives of the VRS GŠ, SRK, UNPROFOR and 1.Rpbr came to inspect firing positions:D2375,para.17.	statement, stated: “Maybe this was erroneously transcribed. I don't know”(T.29574), despite having admitted that the first version of his statement (which included D2375,paras.16-17) had been based on a transcript of his interview and “accurately reflected what I said”:T.29571-29572.
Stojan DŽINO	
Claim contradicted by own statement	
Claim	Contradiction
There was no persecution in the “Serbian municipality of Rajlovac”:D2387,para.68.	Denied knowing the name of the municipality and whether it was preceded by “Serbian”:T.29852-29854.
Agreed that the Muslim civilians of Ahatovići were detained in Rajlovac after Serb forces took over Ahatovići:T.29857.	Later abandoned this claim—when asked if he remembered his previous days’ testimony that the civilians from Ahatovići “were indeed taken to Rajlovac” claimed he did not because the questions “confused me”, asserting that “I’m much more stable today and my answers will be better today than yesterday”:T.29870-29871.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Was not an SDS candidate in any elections in 1990:T.29849.	When confronted with 1990 candidate list for the Novi Grad elections, agreed that it was a list of SDS candidates:T.29849-29850. When shown his name on this list, claimed it was not a list of candidates:P5975;T.29850-29851.
Only economic reasons were in place for Rajlovac municipality to separate from Novi Grad municipality:T.29852.	When confronted with a document, confirmed that the Rajlovac municipality president stated that the Serbian municipality was established “in order to prevent an even bigger expansion in the settling of Muslims in the area which has increased as well as the legal building of houses”:T.29875-29880.
Other credibility/reliability issue	
Stated that he saw the Ahatovići mosque being destroyed during the Serb taking of the village, but refused to acknowledge that Serb forces were responsible, suggesting instead that he believed, without having seen for himself, a rumour that ammunition was being stored inside and it had “exploded”:T.29867-29868.	
Evasive, e.g. when refusing to answer questions about whether he received a copy of another witness’s statement from a member of the Defence team and later denying knowledge of how he received it:T.29868-29870; supplied inappropriate commentary:T.29873-29874.	

Miroslav GAGOVIĆ**Claim contradicted by other reliable evidence**

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Claim	Contradiction
<p>JNA was “the army of all the various ethnicities”(T.31859-31860); the SDS had no influence over the JNA and witness cooperated with “all the legal representatives of people in his zone of responsibility”:D2738,para.36.</p>	<p>Confirmed evidence which shows witness himself collaborating with and supporting the Bosnian Serbs, including:P6073(agree to help Serb commander who requested supporting fire:T.31895);P6074(told Mićo STANIŠIĆ “we are waging war” and STANIŠIĆ said witness should call if he needs anything:T.31898); and three intercepts with Iliđža CS commander Neđeljko PRSTOJEVIĆ in which PRSTOJEVIĆ refers to witness as “great leader” and in which witness agrees to provide powder for guns(D1217), advised PRSTOJEVIĆ to use infantry instead of the requested APCs and “we will be active in front and securing the flank;”(P5667) and redirected request for truck, stating “we’re doing everything we can” to support Serbs surrounded in Buća Potok(P6075). Admitted these conversations with PRSTOJEVIĆ were “a common occurrence” during that time:T.31898-31903.</p>
<p>Claimed that SDS “did not have any weapons as a party” and “never had any armed formations”:T.31880.</p>	<p>Confronted with 11-May-1992 intercept(P6071) in which witness says “this party has significant influence” and is heavily armed with weapons they seized from Faletići, witness said he was referring to weapons that were taken by the Serb TO, not SDS as “a party” and that in any event the Serbian TO did not have “lethal or destructive weapons”:T.31879-31880,31882-31883. Confronted with 1994 <i>Srpska Oslobođenje</i> article(P6072) where SDS executive committee member Milovan BJELICA said activists seized weapons from Faletići, including “about three hundred artillery tubes”, witness said he was talking about something “different” in the intercept:T.31884-31885.</p>
<p>When Muslims attacked Iliđža on 22-Apr-1992, there were no “military features” there:D2738,para.14.</p>	<p>Even PRSTOJEVIĆ, witness’s frequent interlocutor during that period, acknowledged a general mobilisation was declared in Iliđža on 5-Apr-1992(T.12968) and made it clear that there was a Serbian TO when SUBOTIĆ was named defence minister on 11-Apr-1992:T.12971.</p>
<p>During time witness was in Lukavica (April-June 1992), “Sarajevo was not bombed. [...] I mean artillery or air force attacks on a city without military features. [...] if the artillery attacked parts of the city, then these were attacks against noticed military targets.”:D2738,para.39.</p>	<p>Apart from the totality of evidence to the contrary, including S.MILOŠEVIĆ’s condemnation of the bombing during this period as “a bloody criminal bombardment”(P1035), witness was directly contacted during this period about “enormous fire” opened on Muslim civilian settlements, prompting the witness to note that the SDS was armed “en masse” and had “lethal weapons at their disposal”:P6071,p.8.</p>

Stanislav GALIĆ

Claim contradicted by own statement	
<p>Claim</p> <p>Claimed he did not remember a single protest that was lodged “just because of a sniping incident”(T.37397,37792); and that UN observers never alerted him to the fact that “the artillery forces of the SRK were acting in a way that would not have been legitimate;” and that he didn’t “receive ever information to that effect”:T.37210.</p>	<p>Contradiction</p> <p>Reminded of this evidence, GALIĆ initially claimed documents contained no reference to artillery fire, only mortar shelling(T.37648), then immediately admitted receiving protests about shelling, and general protests about sniping in a particular area(T.37649), and learning that SRK shelling and sniping into Bosnian-held Sarajevo was causing civilian casualties through sources including his staff(T.37788); UNPROFOR and the UNMOs(T.37647,37788-37789); the media(T.37397) and the Main Staff(T.37397). Later backtracked, saying while he didn’t specifically recall notice from Main Staff, he accepted it was possible if transmitted via INDIĆ and his people that it had been conveyed to him:T.37794. Accepted that cross-examination documents established he had notice of casualties:T.37791.</p>
<p>Stated that whenever the SRK received protests, they took the allegations very seriously, treated them responsibly, and he ensured that all the allegations from UNPROFOR were checked:T.37210-37211,37224,37644.</p>	<p>Testified that he could not respond to general protests and investigate alleged incidents unless they were backed up by commission reports with specific supporting documentation in the format defined in Protocol I:T.37649-37650,37658-37660,37796-37797. Asked to identify what part of Protocol I he referred UNPROFOR to in order for them to adopt the required format, admitted that “protest” appears neither in the Geneva Conventions nor in Protocol I, then changed his evidence, claiming he pointed them to Art.90 regarding commissions in charge of establishing grave violations of the conventions:T.37796-37801.</p>
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>UN equipment, command posts and positions were never targeted by the SRK:T.37815.</p>	<p>Contradiction</p> <p>Confronted with two letters from SMO CUTLER to GALIĆ personally, dated 13 and 14-Feb-1993, protesting the repeated, deliberate SRK shelling of OP Papa 5(P6298;P6299), GALIĆ offered inconsistent responses, initially stating he was unaware of this OP’s location, then implicitly admitting the shelling. Regarding P6299, initially said he didn’t recall the situation in the area, but then testified that there was combat ongoing at the time. Confronted with CUTLER’s testimony in <i>Galić</i> trial that he had investigated and found no evidence of outgoing fire nearby, GALIĆ said he simply didn’t remember this</p>

	<p>specific day, then claimed to remember many details, saying the OP was not visible enough, too close to Muslim positions, and may have changed position:T.37814-37822. Unable to say why no one answered CUTLER's protests, GALIĆ then undermined all his previous answers saying that he wasn't there and didn't really know what happened:T.37825.</p> <p>Confronted with UNMO report showing SRK forces heavily shelled northern and western areas of Sarajevo and city centre for the entire week of 31-Dec-1993 to 6-Jan-1994 (date of F6)(P2293), GALIĆ stated that the shelling described in this report took place outside of Dobrinja (where F6 occurred):T.37827-37831.</p>
<p>Re:F6 and D3452, stated that during Orthodox and Muslim holidays there was as little war activity as possible:T.37521.</p>	<p>Confronted with the assertion that the SRK 1st SmbR had a sniper unit, quipped: "Not correct. If you know better was the situation was in the Sarajevo-Romanija Corps, then fine, you can testify. I'll do something else":T.37838. Then responding to Defence witness MALETIĆ's testimony(D2519,para.31) that there was a sniper squad in the 2nd Battalion of the 1st SmbR, he replied: "I did not understand these statements and assertions. To arrive at conclusions based on partial information, if anybody had such units, they should tell us when they were set up, who set them up, under whose command they were." Asked by the Chamber whether he excluded the possibility that a sniper squad existed, GALIĆ then said he didn't know, but it was possible:T.37838-37842.</p>
<p>From the reports he read in respect of G8 after returning to corps command, GALIĆ learned that some commission was established to inspect the units:T.37863.</p> <p>KARADŽIĆ would never have punished the Serbs by robbing them of electricity and water:T.37877.</p>	<p>Testified he didn't know who was on the commission, who led it, who commanded it, what they worked on, what they did, and where that report is:T.37867.</p> <p>Confronted with 27-Sep-1994 complaint of the Assembly of Serb Sarajevo to KARADŽIĆ and KRAJIŠNIK about the cutting off of supplies to Sarajevo to raise tension(P6300), replied that he had no such information, and that if this is the way to manipulate the situation, then this was bad, because civilians on both sides suffered the most. Concluded with the implausible assertion that OTP was the first one saying that utilities were manipulated:T.37877-37879.</p>
<p>SRK complied with the total exclusion zone agreement to the last letter, and if they ever did anything fully and completely, "then it was the implementation of your agreement with AKASHI that was reached on the 18th of February, 1994. That's the so called TEZ agreement":T.37447-37448,37458-</p>	<p>Confronted with his 9-Feb-1994 order to all units to move defective weapons to visible locations towards Sarajevo, so that if the agreement was signed the defective weapons could be removed and basic weapons systems would meanwhile remain at vital positions(P6303), claimed he was not at Corps Command at that time, and this was a preparatory order for what would follow</p>

37459.

on the 18th or 19th:T.37952-37955. Shown his 20-Feb-1994 personal report to the Main Staff, confirming SRK had actually not complied, and “parts of units with their private weapons were kept in full combat readiness with enhanced measures of surveillance and position maintenance”(D2802), GALIĆ maintained that weapons remaining in the TEZ were not in working order, and this order only referred to light weapons from 12.7mm downwards:T.37956-37959.

Other credibility/reliability issue

Frequently completely unresponsive: e.g. on the questions of the basis for his conviction(T.37638-37639); whether he ever took action in response to Maj. BERGERON’s sniping protests(T.37655-37657); who in UNPROFOR he told about the prescribed format he required in order to action a protest(T.37797-37798); why he never told CUTLER that he needed a commission report, an on-site investigation, the azimuth or the direction of fire(T.37823-37924); whether a cease-fire was in force in May 1994(T.37834-37835); whether there was firing coming from next to the atomic shelter on the date of G3(T.37854-37855); whether he would fire a mortar at a target 150m away(T.37856-37862); whether SRK forces shelled Sarajevo on 4-Feb-1993(D3410;T.37925-37928); and whether he was familiar with the Old Town of Sarajevo:T.37929. Several times GALIĆ stressed that the source of his evidence was not his direct knowledge of the events but evidence elicited during his own trial or general knowledge unrelated to the specific time he was asked about: e.g. T.37478-37480,37495,37564,37833,37837,37854-37855, 37863,37924,37936,38038.

Edin GARAPLIJA

Claim contradicted by other reliable evidence

Claim

The Bosnian Human Rights Chamber quashed the entire judgement that resulted in GARAPLIJA’s conviction:T.33404.

Contradiction

Confronted with the fact that the Bosnian Human Rights Chamber ultimately upheld his conviction for mistreatment and attempted murder, he claimed that he was only ultimately convicted for “overstepping [...] official authorities” but not attempted murder:T.33405. When confronted with the Bosnian Human Rights Chamber Judgement upholding the Bosnian Supreme Court conviction of GARAPLIJA for maltreatment in discharge of duty and attempted murder(P6103) and asked to confirm that these were the charges upon which he was ultimately convicted, the witness provided evasive and non-responsive answers:T.33405-33408.

Other credibility/reliability issue

Was convicted for the mistreatment and attempted murder of HERENDA perpetrated in the course of the very same interrogation in which he gathered all the information, with respect to the activities of the Ševe unit, that he testified about:T.33403-33409.

Slavko GENGO	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Stated that fire opened “exclusively” against enemy’s combat positions and mostly in response to their actions; civilian facilities were endangered by “our fire” only in the event that they were in the direct proximity of military targets:D2383,para.20. Added that in 1994 and 1995 SRK “lacked ammunition [...] the Muslims had more and that’s why they shelled us more. [...] That’s why we did not respond in equal measure to the fire opened by the opposing side”:T.29825.</p>	<p>Confronted with P846, in which KARADŽIĆ states: “There is evidence that Serbs are not responding in equal measure to Muslim artillery provocations—sometimes twenty to thirty, or even seventy times more”(P846), responded that this was “absolutely impossible”:T.29826.</p>
<p>Re:G8, witness stated that in the weeks preceding 5-Feb-1994, there were no SRK plans to undertake offensive operations in Sarajevo area and no direction to 1.Rpbr in particular to undertake any offensive operations against the city:T.29799.</p>	<p>Confronted with 26-Jan-1994 GALIĆ order ordering a continuance of “offensive activities” and “holding the MOS in Sarajevo firmly encircled, inflicting casualties, preventing supplies from arriving, and preventing evacuations, using all means to exasperate them and with offensive activities”, which was directed at 1.Rpbr among others(P5968,pp.4,8,10), witness acknowledged that he was on this order, then claimed he “did not have this order”:T.29802. After questions from Judge Kwon about references to “liberat[ing]” certain villages(P5968,p.5;T.29833) and “wider-scale offensive activities”(P5968,p.8), witness stated he did not know what GALIĆ “had in mind”:T.29842.</p>
<p>Stated he was informed on the same day as G8 that an inspection team of individuals from the VRS Main Staff, SRK and Brigade Command, and UNPROFOR, would come to his battalion’s zone of responsibility to conduct an inspection related to the incident; that this “mixed commission” arrived the next day (6-Feb-1994) and toured the battalion’s 120mm mortar position in Mrkovići sector, speaking to soldiers and officers. Testified DŽIDA escorted the team and reported to the witness after the visit that “everything was fine” Claimed that several days later, an UNPROFOR team conducted a “regular visit” and a French officer told the witness that his</p>	<p>No mention of an intended or actual visit by a mixed commission in SRK regular combat reports from 5, 6 and 8-Feb-1994:P5969; P5971;P5972;P5973;T.29808-29810;T.29815-29818.</p> <p>The entire compilation of UNPROFOR documents relating to G8 does not refer to any site visit by a mixed commission. It contains a UN report stating that CVETKOVIĆ admitted the SRK had 120mm mortar positions in Mrkovići area but that they “have not been visited by UN personnel in at least four months, and cannot be located with any accuracy. Since October 1993, UNMOs have been denied freedom of movement in this brigade area”:P1441,p.44. This compilation also contains a UN report on a 13-Feb-</p>

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<p>battalion had nothing to do with the incident:D2383,para.32.</p>	<p>1994 meeting between UNPROFOR and CVETKOVIĆ stating that CVETKOVIĆ “had no specific evidence to offer of direct relevance to the investigation”:P1441,p.56.</p> <p>Confronted with each example, witness acknowledged discrepancies and simply repeated a version of “that’s all I know. I’m not aware of anything else”:T.29822..see also T.29815,29818-29820,29827.</p>
<p>Other credibility/reliability issue</p>	
<p>Claimed that DŽIDA wrote a report related to the alleged inspection by UNPROFOR of SRK mortar locations at Mrkovići and Debelo Brdo the day after the attack that was sent up the chain of command; that he kept a copy of the report safely with the battalion documents, and that he “suppose[d]” that JAKOVljević wrote a separate report:T.29807-29808. DŽIDA himself testified that only JAKOVljević wrote a report:T.29591-29592.</p>	

<p>Izet GOLJIĆ</p>	
<p>Claim contradicted by own statement</p> <p><i>Claim</i></p> <p>Referring to the Koševo hospital complex, stated: “We never received orders to return fire on the complex”:D2665,para.24.</p>	<p><i>Contradiction</i></p> <p>Identified the hospital complex among a number of other locations used as “staging areas” for “enemy infantry forces,” saying “[t]hose were the locations of targets at which we opened fire in case of large concentration of their forces which had been reconnoitred or if fire had been opened at our forces from those locations”:D2665,para.17.</p>
<p>Other credibility/reliability issue</p>	
<p>Assertion that the Muslims in Sarajevo had fewer heavy weapons until they seized the barracks in Sarajevo(D2665,para.19) has no basis other than his vague and implausible observation that he personally “felt it all” because he was exposed to their artillery fire(D2665,para.19) and is contradicted by the weight of Prosecution evidence, including testimony(J.WILSON:T.4074;R.MOLE:T.5817;A.VAN LYNDE:T.2467) and the SRK map, the legend of which shows the SRK-ABiH weapons disparity existed even in 1995:P5990. His claims that he “know[s]” the Muslims had infantry weapons, “if not more than us, then equally as us”(D2665,para.19); that Muslims had snipers on “all high-rise buildings” on the north bank of the Miljacka(D2665,para.27) and that car money he had been cheated out of was “obviously” used to buy weapons discovered about a year later in a flat rented by one of the car company managers(D2665,para.20) are patently unreliable exaggerations.</p>	

<p>Richard GRAY</p>	
<p>Claim contradicted by own statement</p> <p><i>Claim</i></p>	<p><i>Contradiction</i></p>

Believes ABiH likely fired mortars at PTT building on 13-Jul-1992, killing and wounding several people, even though there was no direct evidence of which side was responsible:D2398,para.13;T.29980-29981.	Confronted with UNPROFOR report stating origin of fire was not confirmed, stated “we did not make a judgement call on it at the time” and agreed he could not make such a call now either:T.29985-29986.
Stated that excerpt from news article quoting witness as saying “Serbs had enough firepower to flatten Sarajevo ten times over but they don’t want to do it” was an accurate reflection of his assessment of intentions of Bosnian Serbs:D2398,para.35;D2403.	Confronted with complete copy of article(D2403), claimed twice that he had not previously seen the article and it misrepresented his position:T.29982-29984,29991-29992.
Verified MLADIĆ diary entry that records his statement at 18-Aug-1992 meeting with KARADŽIĆ , MLADIĆ and others that Serbs had not initiated fire but returned fire for the past two months:D2398,para.34;P1479,p.73.	Confronted with 29-Jul-1992 excerpt from Colonel Stjepan Šiber’s diary quoting witness as saying, “I know they are lying when they say they are only returning fire”, admitted it was hard to determine who fired first and could not say with certainty that in those two months that Serbs only returned fire:T.29977-29979.

Svetozar GUZINA

Claim contradicted by own statement	
Claim	
The SRK had no sniper rifles in the area of the 1 st Battalion, nor any trained sniper shooters:T.31157-31158.	Contradiction The 4 th Company of the 1 st Battalion had three snipers, as well as M48 rifles with optic sights that were used for sniping:T.31161;P6014.
Could not remember what type of rifle an M76 was:T.31164.	Stated “I said a moment ago that I had M48 and three M76 rifles”(T.31165), and then acknowledged that the M76 was “probably” a standard sniper rifle:T.31166.
Stated F9 took place near front line and “it was not logical to assume that there would be civilians” there(D2553,para.45) in particular due to conflict in the area:T.31168.	Aware that in his zone, civilians “constantly turned up near the first lines, despite all the warnings and prohibitions” due to desire “to be in their homes and look after of their property”, acknowledged this “was probably the case on the other side of the conflict line”:D2553,para.39.
Issued orders not to fire at civilians and saw a decree from the Accused in the early days of the war “to take care about civilians and such things”:T.31181.	Asked whether he gave any order explaining rules of engagement to his subordinates, stated he ordered that the lines of defence should at no cost be threatened and said nothing about not firing at civilians:T.31182-31183.
Claim contradicted by other reliable evidence	
Claim	
Attributed F9 to the fact that “during 26 June, there were	Contradiction Shown D2554, which described fire from Muslim positions on 25-Jun (24

<p>battles in this area” as reflected in a 26-Jun-1994 SRK report(D2554):D2553,para.45.</p> <p>The SRK had no sniper rifles in the area of the 1st Battalion, nor any trained sniper shooters, and when confronted by UNPROFOR about sniping, witness denied to UNPROFOR that his Battalion was sniping:T.31157-31158.</p>	<p>hours before F9) and asked to confirm that the document did not bear on the situation a day later, insisted that there was firing on 26 June, stating “I did not base myself on reports of the Corps”:T.31175-31176. Further confronted with AF229, stating that the victim heard no firing and saw no troops in nearby trench on the day of the incident, witness stated he was unaware of that information “but the fact is you believe Muslim reports, not Serb ones. That’s up to you. I don’t believe this happened that way”:T.31177.</p> <p>Confronted with UNMO report stating: “Commander of the 1st Battalion of the BSA Iliđa Brigade admitted the sniping by BSA from BP 859578 (house for the blind people). He promised that there would be no more sniping from that place”(P1601,para.24;T.31179); admitted being the commander described in the document but said “UNPROFOR was able to write whatever they pleased”:T.31181.</p>
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Milenko INDJIĆ

Claim contradicted by other reliable evidence

Claim

Doubted that MLADIĆ is speaking in MLADIĆ/VUKAŠINOVIĆ intercept P1518, regardless of the similarity of voice, because MLADIĆ had a house close to Velešići so it is “scarcely probable” that he would have referred to the neighbourhood as “Velešići”:D2774,para.116.

GALIĆ expressed full readiness to support anti-sniper teams in Sarajevo and personally signed the agreement to cease such action (sniping):D2774,para.139.

In context of establishment of TEZ, witness was a member of the negotiations delegation and personally in charge of coordinating activities regarding the grouping of weapons:T.32451-32452.

Emphasized that all artillery available to the SRK was placed

Contradiction

Confronted with evidence that MLADIĆ had confirmed he was the speaker in this conversation, witness stated “I did not say that I doubted whether that was General Mladić” then illogically maintained that his doubt centered on MLADIĆ’s use of the term Velešići versus Velešići because MLADIĆ had a family house in that area:T.32625-32626.

MLOŠEVIĆ, not GALIĆ, signed anti-sniping agreement:P861. Confronted with SRK report(P1617) and UNPROFOR letter(P862), both detailing 15-Aug-1994 meeting on implementation of anti-sniping agreement in which witness took part and showing VRS refused UN anti-sniping teams on their territory, agreed that the VRS did not accept anti-sniping teams, claiming this was because they exceeded UNPROFOR’s mandate:T.32627-32630.

Shown SRK command document listing weapons not pulled out(P6016), witness contradicted his earlier testimony stating, “I don’t know what was happening up and down the chain of control and command” and acknowledging “There may have been some initial attempts to avoid placing all the artillery weapons under control”, then claimed he stood by his previous

<p>under control, stating “the essence of what really matters is what actually happened on the ground [...] So what happened in actual reality on the ground is all of the artillery weapons were placed under effective control”:T.32446-32447,32642-32643,32645.</p>	<p>testimony before contradicting that testimony yet again by stating “if there was a ruse somewhere between the corps commanders and the brigade commanders going on, I wasn’t interested in that”:T.32644-32646.</p>
<p>Denied telling SMITH that UNPROFOR prisoners would be killed or that harm would come to them in any way from VRS:D2774,para.171.</p>	<p>Confronted with 3-Jun-1995 UNPROFOR protest letter noting that INDJIC threatened to kill one of the French soldiers if they didn’t stop the attack immediately(P2434), unresponsive to the question of whether he received this protest, called the allegations a blatant lie, adding “I am sufficiently trained and a sufficiently skilled professional to know that were I to go on and say something like that, I certainly wouldn’t do it over the phone”:T.32638-32639.</p>

Janko IVANOVIC	
Claim contradicted by own statement	
Claim	Contradiction
Saw Muslim soldiers “every day” mainly going in direction of Igman and knew where Muslim military department was located:D2763,para.2.	Asked how he was able to see events outside his building, witness said he did not see anything because had no electricity and did not go out except when receiving news that somebody was killed:T.32058-32059.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Muslim forces seized two APCs after attacking Krtelj in April 1992:D2763,para.3.	Shown report(P2308,p.2) that Serb police seized equipment in Krtelj attack, admitted he only heard people say the Muslims seized two APCs:T.32062.

Steven JOUDRY	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Challenged reliability of UNPROFOR’s conclusions because of alleged late gathering of evidence:D2363,para.26.	Confronted with evidence of continuous UN presence from five minutes after the explosion, acknowledged he “did not have a specific knowledge of that”:T.29334. Confronted that he did have such knowledge – because it was in the UNPROFOR report he reviewed – said that he could not “confirm” whether it was true or not, but admitted that the report indicated no tampering with the scene and he had no basis for disputing that:T.29335

<p>UNPROFOR's conclusions were questionable because fuse tunnel had been disturbed and therefore angle of descent could not be known:D2363,para.23.</p>	<p>Agreed not only that the fuse tunnel could have remained intact after removal of the tail fin(T.29337) but that evidence indicated that the tunnel was in fact intact:T.29338. Further, witness admitted that this information had been included in the materials he had reviewed:T.29339. Further, witness had "no idea" whether Bosnian forensic officials re-inserted the tail fin(T.29346) and when confronted with the evidence that the tail fin fit snugly back into the crater(P2317) indicating that it was in the same position it had been when removed, witness conceded:"If that was his evidence, that's fine":T.29346. Finally, asked whether he was aware that the calculations from the reconstruction were essentially the same as those done by HAMILL earlier, acknowledged: "That sounds reasonable":T.29347</p>
<p>Distance the projectile would have been fired from was likely on the Bosnian side because he would have expected a low mortar charge:D2363, para.24B.</p>	<p>Agreed that the depth of the stabiliser in the ground indicated a high-impact velocity and therefore a higher charge:T.29351-T.29352</p>
<p>One of the factors underlying his conclusions concerning a hand-thrown projectile was the disturbance of the asphalt in several areas, thus calling into question the crater:D2363, para.26;T.29356.</p>	<p>Confronted with the repeated assessment of those who had actually been to the scene that the clearly-defined crater and shrapnel pattern "definitely" indicated a mortar bomb, claimed: "That's not my recollection of the information I reviewed":T.29356. Confronted with numerous references in the UNPROFOR report(P1441) to the sharpness, clarity and "classic" nature of the mortar crater, said:"I don't recall reading that information at the time I did my review, sir.":T.29356-T.29357.</p>
<p>Other credibility/reliability issue</p>	
<p>Offered an opinion, despite fact that he had never seen the scene or examined any physical evidence; also, never interviewed witnesses(D2363,para.14;T.29348) and had no experience with 120mm mortars:T.29329.</p>	

Blagoje KOVAČEVIĆ

Claim contradicted by own statement

Claim

Indicated that his unit was under orders to the effect that if fire was opened at civilians in Muslim held Sarajevo, an investigation was to be conducted and the perpetrators punished. He also issued such orders:D2331, para.33. There were individual cases of breaches of discipline:D2331, para.34.

Contradiction

Could not say whether any of those breaches dealt with killing or injury of civilians in Bosnian-held territory by forces under his command, because he couldn't say "what exactly happened over there." Indicated that he gathered his information from BiH TV and on that basis, believes many things were staged:T.29076-29077. He did not conduct any investigations of shelling

	civilians in Bosnian-held territory and could not identify a single such investigation at the battalion or brigade level:T.29076-29077.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Re:G19, stated that the blue line on map D2333 passes through his AOR and along that axis, 220°, there was no Serb artillery at all, even 82mm mortars:D2331,para.51.	D2333 inaccurate. Location where the market was hit is about 200m north of marking on D2333 – see D617. SRK maps P1021 and P1077 show the Brigade Artillery Group, with 120mm mortars, at a roughly 210-215° axis from Markale.
Other credibility/reliability issue	
Denied 1.Smbr had organised sniper groups, only individuals “who wanted to portray themselves as being some sort of specialists in order to boost their image”:D2331,para.36;T.29050-29051. MALETIĆ, company commander in 3 rd battalion of 1.Smbr(T.30844), however testified that there was a sniper squad in Battalion Command, directly subordinated to the commander:D2519,para.31;T.30847-30848.	

Zoran KOVAČEVIĆ	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Nobody from Pretis or the witness’s brigade launched an MAB at Dositejeva Street on 16-Jun-1995:D2484,para.23.	Confronted with an SRK report dated 15-Jun-1995 showing his brigade had an MAB launcher the day before G14(P1283), responded that he was not competent to answer whether it was possible the MAB was launched from the Vogošća zone of responsibility and that he did not even know where Dositejeva Street was located:T.30617.
“It was explained to me” that the alleged incoming trajectory of the G8 shell pointed towards the village of Mrkovići. “To my knowledge, there were no artillery units or mortar on the axis towards the village of Mrkovići”:D2484,para.22.	Asked who “explained” the trajectory to him, KOVAČEVIĆ claimed he “saw it on television” when the Russian officer gave an expert opinion and “it was all over the media,” when in fact DEMURENKO’s televised opinions were about G19:T.30618. Pressed further, KOVAČEVIĆ said, “I am not asserting anything because I was not there. Therefore I cannot claim anything”:T.30618.
Other credibility/reliability issue	
KOVAČEVIĆ claimed that he never heard of civilians casualties or injuries during his unit’s combat operations:T.30612; when questioned about firing on the city, evaded the question by volunteering a suspicious legalistic formulation, saying “we did not understand that as part of a systematic or widespread attack on civilians”:T.30611.	

Other credibility/reliability issue	KW-554
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While he was present in former Yugoslavia when May 1995 air strikes took place(D2762,para.14), admitted that he was not in Pale, and any information received about UN hostage-taking came second-hand and not in realtime:T.32032-32034.

Regarding a photo purportedly showing that the Bosnian side carried out the Markale I shelling by dropping a mortar shell from a window overlooking the marketplace(D2762,paras.10-11), admitted he did not see what was on the picture, and accepted that for such a photo to have been taken the photographer and camera would have to have been reasonably close and survived a massive explosion that killed about 66 people and wounded over 140:T.32036-32037.

[REDACTED]

KW-570

Claim contradicted by own statement

Claim

[REDACTED]

Given height of buildings immediately adjacent G8 impact site it appeared, and all reporting from various sources, including Major RUSSELL, indicated that the G8 shell would have had to come in with a very high trajectory, suggesting that it had been fired at close range:[REDACTED];T.32229-32230.

Contradiction

Basis for alleging Serbs had the practice of “ranging in” their mortars when targeting Sarajevo comes from his single experience of being caught with civilians under mortar fire during Serb advance on Konjević Polje and his information, that five mortar rounds were fired in order to hit the target the day before (G7):T.32223-32224.

While witness agreed mortars can fire on up to six charges, and as the charges increase the distance range of the mortar also increases, admitted he was “no expert” and can’t read a mortar firing table: 32229-T.32230. Confronted with RUSSELL’s *Karadžić* testimony that RUSSELL agreed he had applied an erroneous principle at the time of the incident and had come to an incorrect conclusion when calculating the angle of descent (T.29399-29400), witness said he wasn’t disputing this, and had been unaware:T.32230.

Confronted with fact that there had been a number of investigations on the site before RUSSELL went to the scene, witness said he “assumed it would have happened” but that RUSSELL said there was no physical evidence of what kind of mortar explosion it was(T.32231). Confronted them with the fact that the mortar tail fin had been recovered before RUSSELL visited the scene, witness simply said “I’ve never seen that, no”:T.32231.

Confirmed that the only time he had ever heard of the Mujahedin being physically active in Bosnia was around Maglaj, and neither Mujahedin nor anything resembling Mujahedin was ever seen in or around Sarajevo:T.32232

KW-586

Other credibility/reliability issue

Unable to recall any dates of events during the war:T.47195-47196.

Claims simply released from Biseri unit in 1994 when the unit was being disbanded(D4374,para.8) despite wartime situation and shortage of men,

Sought out **KARADŽIĆ** defence(T.47197) offering evidence he witnessed a massive conspiracy by **IZETBEGOVIĆ** and other leaders to involve the international community in BiH by sacrificing Bosnian population, in actions which included staging G8:D4374,paras.5,7-8. A former truck-driver(D4374,para.1) confirmed he was just a guard for **IZETBEGOVIĆ**(T.47213) and “nothing” to the members of the alleged conspiracy, and was unable to explain why influential personalities would discuss actions in his presence which could turn world opinion against BiH:T.47215-47218.

Explanation as to why he only came forward after 20 years with these important allegations wholly unconvincing. He never said anything despite ample opportunities: first in Germany(T.47205); then during several years’ stay in Belgium(T.47207-47208); after returning to Bosnia where ICTY Sarajevo field office and witness protection services were available to him(T.47213); even during the trials of **HALILOVIĆ** and **ORIĆ**(T.47210), both alleged members of the witness’ conspiracy:T.47207-47213. Testified that in 2000 he told his closest relative he would testify and the next day received threats:T.47210-47211. Reminded that two days prior to testifying, he recounted the same story to OTP investigators saying it happened in 2012, responded, “You obviously misunderstood all of that”; then stated this was in 2001:T.47211-47212.

Claimed the shell fired in G8 came from BiH positions under Mirkovići by **HAJRUHAHOVIĆ** on orders of **HALILOVIĆ** with knowledge of **IZETBEGOVIĆ** and other leaders and an UNPROFOR team:D4374 para.8;T.47221-47224. Confronted with assertion that his claim was impossible, as **HALILOVIĆ** was had been dismissed from the army and ostracised months before, witness could only say that **HALILOVIĆ** had been removed, not dismissed, and was not in Sarajevo all the time, but would come by when he was:T.47225-47226.

Vlado LIZDEK

Claim contradicted by other reliable evidence

Claim

Relevant to F17, witness claimed that the nearest inhabited area to Špicasta Stijena was 1.5-2km:D2267,p.45.

Contradiction

Confronted with evidence that the nearest civilian area in Sedrenik was only 400-500m away from Špicasta Stijena (*see e.g.* H.KONINGS:P1953,paras.10,40), witness first denied it(D2267,p.46), then said infantry arms could not be used with effect from Špicasta Stijena to

	<p>Sedrenik because that distance was more than 1000m, excluding the houses at the foot of Špicasta Stijena:D2267,p.47, then appeared to admit that there had been civilian casualties but blamed the Muslim side for not removing civilians from the area(D2267,pp.47,67), and finally implied that the Muslim side forced civilians into the area to cause the media to “report that we are actually shooting at civilians and not at soldiers”:D2267,p.48.</p>
<p>Other credibility/reliability issue</p>	<p>Claimed 1.Rpbr, which he commanded, “did not have mortars” at the time of G8:D2267,p.64. This was contradicted by DŽIDA, former Assistant Commander for Intelligence and Security in the 1.Rpbr 7th Battalion(D2375,para.5); and GENGO, former 1.Rpbr 7th Battalion Commander(D2383,para.3), confirming the 1.Rpbr had mortars at the time of G8:M.DŽIDA:D2375,paras.17-18,29;T.29574-29576; S.GENGO:D2383,para.32;T.29767-29768;T.29774-29775;P5966.</p> <p>Appeared to confuse G8 and G19: in comments regarding G8, he referred to “deputy commander of SFOR, General DEMERENKO” and stated, “they have proven that this shell did not come from our [SRK] side”:D2267,p.63. DEMURENKO, by his own testimony, investigated G19, not G8:D2270,para.42.</p> <p>Evasive and vague when asked to explain how the command of the brigade and the battalion had determined that the mortar responsible for G8 had not been fired from its positions, stating: “I guess even if you would ask the crews [...] It would be the same as asking me how you learned to ride a bicycle. How you did with your left foot, and the right foot”:D2267,p.65.</p>

Veljko LUBURA

<p>Other credibility/reliability issue</p>	<p>Had virtually no knowledge of issues regarding utilities relevant to this case <i>e.g.</i> knew nothing about Bosnian Serbs denying access to repair lines as reflected in UNPROFOR report from July 1993(P6270), and “had no connections to either of the armed forces”:T.31057-31058; unaware of Bosnian Serb efforts to condition the restoration of utilities on military events, as reflected in UNPROFOR report from 2-Jul-1995 (P896):T.31062-T31064; was not present when decision made in Pale to cut off electricity into the city, as reflected in, an UNPROFOR report dated 26-May-1995(P6274), and did not recall this:T.31075-31083.</p>
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Vlade LUČIĆ

<p>Claim contradicted by own statement</p> <p><i>Claim</i></p>	<p><i>Contradiction</i></p> <p>Repeatedly denied knowledge of orders to his brigade even though serving in its command:T.30792-30796(P847;P1654;P6016);T.30798-30799(P2668);T.30802-30804(P6017);T.30808-30809 (P1300;P1315); T.30814(P1060);T.30817(P1644).</p>
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Claim contradicted by other reliable evidence	
Claim	Contradiction
It was the BSL's sincere intention to remove heavy weapons under the agreement with the UN:T.30792.	Shown a Main Staff order to move inoperative weapons into firing positions by night and then move them out by day in the event of a ceasefire agreement, while hiding operative weapons(P847), denied seeing this order:T.30792-T.30794. Shown an agreement on the TEZ and WCPs(P1654), claimed his unit was 70km from Sarajevo at the time:T.30794-30795. Confronted with an SRK report dated one day after the deadline for moving heavy weapons to the monitoring sites, listing material "not pulled out" including "hidden" weapons of his own brigade(P6016), denied knowing anything about this list or "that anyone hid anything":T.30795-30796.
Ammunition in his unit was under strict control and there was no misuse:D2516,para.24. He heard nothing while in brigade command about vast quantities of ammunition being fired in areas where there were no combat activities, and such misuse would have been unlawful:T.30797-30798.	Shown a warning from the SRK to all brigades including his own condemning the firing of vast quantities of ammunition at inhabited areas where there is no combat activity(P2668), denied seeing this order and reiterated his claim that his brigade had no artillery directed to Sarajevo at that time:T.30798-30799.
Denied I.Rpbr had air bombs:T.30808.	Confronted with two SRK orders showing witness's brigade possessed airbombs(P1300;P1315), stated "I was not privy to that" and "I am unaware of any information concerning the bombs":T.30808-30809.
BSL's policy was to enable, not prevent, delivery of humanitarian aid to Sarajevo: D2516,para.26; T.30811-30813.	Denied knowledge of an order to SRK command to close the blue road(P1639), and of a Main Staff report(P879) stating "any movement of humanitarian organizations and convoys is prohibited until further notice":T.30812-30813. Contradicted the plain words of P879 claiming "it is stated that convoys should not be prevented from passing through":T.30812-30814.

Ratomir MAKSIMOVIĆ	
Claim contradicted by other reliable evidence	Contradiction
Claimed that he did not know until "later" that Jovo OSTOJIĆ, the commander of 40 volunteers taken into Vogošća Brigade in March 1994, was a member of ŠEŠELJ's party; and that he "had no particular contact" with this group, "just saw them":D2667,para.57;T.31578.	Confronted with BEARA's 14-Apr-1994 report that witness led briefing attended by "Vojvoda Jovo OSTOJIĆ, commander of the SRS volunteers detachment" and that witness ordered this unit to be equipped, admitted he met OSTOJIĆ; denied he made the decision to arm this unit and said SRK "had nothing to do with" arming unit. Then admitted unit received weapons from

<p>Claimed that he was at SRK Command between 1-Apr-1993 and 1-Sep-1994 and “occasionally dispatched” to the field, and when specifically asked by Trial Chamber about his capacity and rank during this time, claimed he was chief for morale and information in the SRK:D2667,paras.4,15;T.31568-31569.</p>	<p>SRK; and denied BEARA’s report there were 100 volunteers while saying BEARA knew more than he did:T.31578,31584,31583-31584;P6054,p.2.</p> <p>When confronted with 14-Apr-1994 report describing witness as Chief of Staff of 3.Spbr(P.6054), weakly responded these positions were not part of his military career and he was not asked about this by KARADŽIĆ; only when pressed by the Trial Chamber agreed he was Chief of Staff for 1½-2 months:T.31580-31583.</p>
<p>Other credibility/reliability issue</p>	

Siniša MAKSIMOVIĆ

<p>Other credibility/reliability issue</p>	
<p>Gave evidence regarding F2 and F17, admitted not being company commander at the time of either incident:T.29296. Made multiple assertions based on erroneous information provided by Defence or on his own faulty assumptions: gave evidence and marked photo about F2 which he had “been told” marked the approximate place where the victim was located:D2354,para.7;D2358. Confronted with the fact that this photo was taken from a different location than P2207, which shows the actual line of sight from incident location to Špicasta Stijena, stated “In that case I can’t say anything about the position from which it was allegedly fired because it doesn’t seem to belong to the [AOR] of my company.”:T.29300. Regarding F17, admitted his estimate of the distance from incident location to source of fire(D2354,para.8) was an assumption based on the photo he was shown:T.29300-29301. After asserting the SRK on Špicasta Stijena only fired at enemy positions(T.29297), confronted with UN document on wounding of two civilians in Sedrenik by sniper fire from Špicasta Stijena(P1619,para.8), and SRK reference to Sedrenik as their “target practice area”:P1619,para.3. Said he could not say the report was incorrect, and could not comment on those events because he was not present in the unit at the time:T.29297-29298.</p>	

Dragan MALETIĆ

<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p>	<p>Contradiction</p>
<p>Asked whether warned against the use of prisoners for forced labour in dangerous conditions, said “I was aware of some of these things, but I’m not aware of all the details”, conceding they used prisoners at “certain moments, like in workshops”:T.30865-30866.</p>	<p>Contradicted by his contemporaneous report on the escape under fire of Muslim prisoners from Kula who had been used for forced labour on a location “constantly under infantry and rifle grenade fire”:P5987;T.30866-30867.</p>
<p>Other credibility/reliability issue</p>	
<p>Throughout 1992 was front-line company commander at notorious sniping locations along River Miljacka including skyscrapers on former</p>	

Lenjinova street and Metalka building:D2519,para.9;D2521;T.30849-30851;AF121;AF2583;AF2917;AF2946. Throughout 1993 held battalion headquarters-level security and intelligence position, thereafter officer in his battalion's Quartermaster Service:D2519,para.9.

Confirmed a sniper squad in his battalion command, directly subordinated to commander:D2519,para.31;T.30847. Despite positions on the ground and at command, maintained he knew nothing about sniper squad's assignment or how it was carried out:D2519,para.31;T.30847-30848. Despite last assertion, admitted there was a firing position on or in Metalka building in 1992 but then claimed they "withdrew in depth", unable to remember when this allegedly occurred:T.30849-30851. Confronted with photo of Holiday Inn(P6024), taken from Metalka, and asked whether it showed a view behind the enemy's front line(T.30851-30852), incredibly insisted "I don't know where this was taken from"(T.30851), "I cannot answer your question because I don't know"(T.30852), and "I never saw the Holiday [Inn] from this point of view"(T.30853), even though he "lived in [Sarajevo]" and "[knew] exactly where all of this [was]":T.30853.

Having admitted existence of sniper squad at battalion command, shown a list of what he acknowledged were his battalion command personnel, directed to names of eleven individuals under the heading "Snipers":T.30847. Claimed not to be familiar with those names:T.30848.

[REDACTED], naming three who also appeared on the list shown to MALETIĆ(T.13196-13197;T.30848), as well as D.FRASER's testimony that the UNPROFOR anti-sniping task force was "very familiar" with Serb sniping positions, locating them with specialised troops with reconnaissance/surveillance capabilities:T.8016-8017. Confronted with this evidence showing local civilians and UN forces better informed about snipers than witness, nevertheless maintained assertion of ignorance, replying: "I said that I did not remember their names and I can only repeat that today":T.30873-30874.

Nikola MIJATOVIĆ	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>"We did not cause the UNPROFOR problems in its work except when it abused its mandate for the benefit of the Muslim army":D2497,para.33.</p>	<p>Shown UN report concerning SRK firing on UN aid convoys on Mount Igman(P897,pp.4-5), claimed it was "obvious" that the SRK "were not the ones who opened fire" because they did not have the weapons described in the report, and stated "somebody just sat down and wrote this off the top of their head":T.30752-30754. On re-direct, authenticated Iliđža Brigade report on the same incident, confirming the Brigade "started" the attack:D2512;T:30764-30765.</p>
<p>Other credibility/reliability issue</p> <p>Stated information on military targets(D2497,paras.8-9) allegedly came from, <i>inter alia</i>, "some commanding officers of the BH army who</p>	

collaborated with us”:D2497,para.10. Pressed to identify these officers, declined the Accused’s suggestion that he answer in closed session, refusing to disclose the information “to anyone in the world”:T.30715-30716.

Despite claiming to have detailed knowledge of arms held by opposing forces(D2497,paras.35-37), testified he did not know whether his own brigade had a single sniper rifle:T.30722. Confronted with 31-Oct-1993 document showing Ilidža Brigade had 30 sniper rifles(P6014), stated he was not present on 31 October due to his family’s saint’s day, so he was “personally unaware” of the document:T.30723-30724.

Claimed MAB trajectories were “predetermined and could be controlled”:D2497,para.18;T.30750-30751. Asked whether this meant the civilian house demolished in G10 was the intended target of the MAB launched by the Ilidža brigade, said “No house was destroyed in that area. It’s an enemy lie”:T.30751.

Persistently non-responsive throughout cross-examination, at the end of testimony called out to **KARADŽIĆ**: “Mr. President, I hope you get out as soon as possible”:T.30769.

Dragomir MILOŠEVIĆ

Claim contradicted by own statement

Claim

Relationship between MLADIĆ and **KARADŽIĆ** was one of domination, with MLADIĆ wanting to be independent and not controlled by any superior body:T.32903.

Contradiction

Unable to provide a single example of MLADIĆ disobeying an order from the president, indicating the extent of his knowledge was his “general impression”(T.32906), later confirming he had never actually seen or heard of MLADIĆ disobeying an order from **KARADŽIĆ**:T.33089.

Claim contradicted by other reliable evidence

Claim

SDS leaders had no influence on his work(T.32815), and while it was “implied” that he was an SDS member and obeyed **KARADŽIĆ**, this was incorrect:T.32904.

Contradiction

Confronted with transcript of 13-Jun-1995 meeting of FRY SDC in which **PERIŠIĆ** specifically describes **MILOŠEVIĆ** as an SDS member; as well as his own 19-May-1996 letter to MLADIĆ reporting that the VRS GŠ had described him as an “SDS general” “in cahoots with Karadžić”:T.33082-T.33083. While insisting he was never an SDS member, admitted he had SDS contacts and conceded he had general contacts with **KARADŽIĆ**(T.33085-33086), but they had “nothing to do with managing any combat activities”:T.33087.

Admitted he was present (along with **KARADŽIĆ** and **KRAJIŠNIK**, among others) at a high-level political/military meeting in Belgrade on 13-14-Dec-1993 to discuss a military operation to take Žuč and Mojmito, to create the

	<p>most favourable conditions for the division of Sarajevo before Geneva negotiations resumed:T.33095;P4925. Refused to acknowledge the obvious contradiction with earlier evidence, and evasively answered he wasn't the initiator or driver of this meeting, and what he meant to say was there was no separate meeting with KARADŽIĆ alone:T.33097.</p>
<p>In early August 1995 he set off with SRK Chief of Staff Čedo SLADOJE to see KARADŽIĆ "in an attempt to resolve the situation" over his effort to have MLADIĆ removed:T.32888. KARADŽIĆ did not order them to meet him; they decided to go on their own initiative:T.33105.</p>	<p>Confronted with 5-Aug-1995 telegram from KARADŽIĆ(P2683) specifically directing MILOŠEVIĆ and SLADOJE to urgently attend a meeting in his office that day(T.33106), testified SLADOJE didn't show him this document, and when they set off for Pale there was no mention of going because the President had asked, but was their own decision:T.33107. Pressed by Chamber as to how it could be possible that a Chief of Staff would not show this urgent document to his own commander, conceded he was informed MLADIĆ was summoning people, and KARADŽIĆ was summoning all the Generals, but maintained he didn't see the document; then completely contradicted his initial evidence, saying "There was no question of to go or not to go":T.33107-33108. Despite being repeatedly asked, unable to identify a single piece of hard data to support his contention, saying "it must be with you" (OTP), and he didn't know which data he was being asked about:T.33130. Confronted with hard data in contemporaneous ABiH order(D663), GALIĆ operations order(P5968) and ABiH attack order(D2791), showing figure of 275 was inaccurate and inflated, refused to accept the obvious contradiction, commenting to OTP that the evidence was contrary "in your opinion":T.33131-33136.</p>
<p>There were 275 command posts in Bosnian-held Sarajevo throughout the war(T.32553,33124-33125); this was based on "hard data":T.33130.</p>	<p>Confronted with his own order on rational expenditure of ammunition specifically acknowledging the SRK fired at inhabited settlements and specific buildings <i>when there are no combat actions whatsoever</i>(P2668), claimed—contrary to order's express wording—this did not refer to Sarajevo and its residential buildings, but areas where there were no settlements, small abandoned settlements which housed only their forces, rural areas just outside Sarajevo:T.33145-33147.</p>
<p>Repeatedly denied SRK targeted civilians or civilian areas:T.32582,32585,32794,32833.</p>	<p>Confronted with his own order on rational expenditure of ammunition specifically acknowledging the SRK fired at inhabited settlements and specific buildings <i>when there are no combat actions whatsoever</i>(P2668), claimed—contrary to order's express wording—this did not refer to Sarajevo and its residential buildings, but areas where there were no settlements, small abandoned settlements which housed only their forces, rural areas just outside Sarajevo:T.33145-33147.</p>
<p>G10 was fired to neutralise four mortars(T.33162,33171,33176) in Hrasnica that had been firing on Ilidža:T.33171.</p>	<p>Pressed to identify exactly where the mortars in question were located, said they were in an area like a park(T.33170) where there were no buildings except in the surrounding areas:T.33169. Confronted with Ilidža Brigade Commander RADOJČIĆ's evidence that the target in this incident was the 4th (later 104th) Motorised Muslim Brigade's command post (which he first said was located at</p>

	<p>the school in Hrasnica, then said was located in the post office)(T.31258) and said nothing about neutralising mortar fire, observed: "Now, what he said may be a result of his faulty memory or something else which guided him in his testimony. I really can't say":T.33182.</p>
<p>Got the report back that the action was carried out and the target hit:T.33175-33177.</p>	<p>Never once confirmed the mortars he had earlier alleged to be targets were hit, saying it would be "superfluous to specify" this in any report and it "wasn't necessary" for him to hear that(T.33175-33177). Confronted with evidence that G10 landed on a civilian house (and not on the mortars), said their goal was to prevent any further fire from those mortars and it was met. Effectively undermining his own assurances of proportionality(T.33123), said "the airbomb need not land straight on top of the mortar to have it hit," and despite his earlier evidence that there were no buildings around the target except in the surrounding areas, then said "in the immediate vicinity of these mortars there was something else, and even if something else is being struck it was of lesser importance than neutralizing the mortars":T.33178</p>
<p>SRK forces were not at Špicasta Stijena:T.32567-32568.</p>	<p>Confronted with evidence of two SRK officers who all confirmed the SRK had positions at Špicasta Stijena(MAKSIMOVIĆ:D02354,paras.4,9-10,T.29296,T.29303;RAŠEVIĆ:D2527,para.20,29,T.30911;GENGO:T.29786). After a lengthy, evasive answer(T.33192-33194), eventually responded to Chamber's questions and confirmed this feature had been included in his indictment(T.33196); he understood where the location was(T.33196), but said "I'm not specifying the area, and I don't call it Špicasta Stijena" reluctantly conceding: "They did have conditions from that position to execute possible fire, and that possible fire was executed to the degree required for them to protect themselves":T.33197.</p>
<p>Flow of humanitarian aid was not disturbed by the corps command or obstructed in any way whatsoever:T.32893-32894,32899.</p>	<p>Confronted with evidence that his forces closed all blue routes around Sarajevo after the sniping death of two girls, claimed he didn't recall that, but did not exclude the possibility that it happened, merely asserting "I think that this was ordered to do so" and if he was ordered to do so, he was in no position "not to heed such an order":T.33227-33228. Contradicted this evidence, saying it wasn't his forces that closed road access to the city:T.33232. See P2256(MILOŠEVIĆ's 12-Mar-1995 report stating that the GŠ order about closing blue routes was being implemented). Then admitted that in June and July 1995 his forces shot at humanitarian convoys using the Igman road if that</p>

	<p>kind of transport connected with the UN or humanitarian aid included Muslim forces vehicles or combat assets:T.33235. Refused to accept the contradiction, however, saying that reviewing the situation over a long period of time, the flow was normal, and the OTP had “lost sight of such circumstances”:T.33235.</p>
<p>Other credibility/reliability issue</p>	
<p>Expressly rejected “yes or no” as a variant of providing answers:T.33087. Testimony markedly unresponsive and evasive on a wide range of issues: division of Sarajevo(T.33099-33104); operation Udar(T.33114-33115); alleged facilities for weapons manufacture in Hrasnica(T.33156-33157); how long it took the crew to respond to his order to launch the MAB on 7-Apr-1995(T.33172-33174); on receipt of information confirming mortars which were the alleged target of G10 were neutralised(T.33163,33174-33178); whether protracted Serb sniping of civilians was a policy(T.33202-33203); whether bullets from SRK side hit trams(T.33210); whether he could confirm he ordered weapons within the TEZ be hidden(T.33219-33221); whether the use of MABs in Sarajevo in 1995 was a violation of the TEZ:T.33227.</p>	

<p>Sergey MOROZ</p>	
<p>Claim contradicted by own statement</p>	
<p><i>Claim</i></p> <p>The only difficulty civilians were having during wartime with regard to water supply was that they had to take water from the ground floor upstairs to their apartments:D2373,p.16;T.29544.</p>	<p><i>Contradiction</i></p> <p>Pressed, recalled “only one period” of two or three days where there was great shortage of water and people had to go outside their homes to get water from trucks with water tanks, and accepted that “of course it took times and efforts to get water”, but denied civilians risked being targeting for sniping and shelling while queuing for water “because usually those trucks were in safe places where people can hardly be targeted”:T.29545. Confronted with the fact that water distribution points were frequently easy targets for snipers, accepted: “Well, of course it was military situation and people always were under risk of being killed, so”:T.29546-29547.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p><i>Claim</i></p> <p>Nikolay RUMYANSTEV, former UNPROFOR member and member of G8 UN investigation team, told him the explosion was not caused by a conventional mortar, could not have come from the Bosnian Serb side and that a special explosive device had been brought into the market place:D2373,p.45.</p>	<p><i>Contradiction</i></p> <p>Confronted with the official report of the investigation, co-signed by RUMYANSTEV, stating the explosion was caused by a conventional 120mm mortar bomb while also describing the shell’s trajectory(P1441,paras.12,14-15), maintained his position that he didn’t know about the report and didn’t know why RUMYANSTEV would tell him something contrary to the report’s findings:T.29543. In re-examination, stated he was unaware of any cases in which UNPROFOR officers were not willing/not authorized to dissent from</p>

official conclusions:T.29548.	
Vladimir RADOJČIĆ	
Claim contradicted by own statement	
Claim	Contradiction
MABs had satisfactory precision; deviations were minimal (10m at 1000m):D2562,para.55;T.31252.	Allowed for the possibility that alleged military targets in the G13 and G15 cases may have been missed:D2562,paras.113-114.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Discussing interim combat he drafted(D2512), claimed UNPROFOR did not protest Ilidža Brigade's 14-Jul-1995 attack on their convoy travelling over Igman because they knew they were violating their agreement with Serbs for the passage of convoys on the road and were offering logistical support to the ABiH:D2562,para.87.	This was an UNPROFOR-escorted UNHCR convoy carrying flour:P897,pp.4-5. Admitted UNPROFOR did not require Serb agreement to use Igman road to access Sarajevo, but denied the UN was forced to use the road because VRS had blocked all land routes to Sarajevo:T.31237(see also P2256). Confronted with UNPROFOR documents reporting UNHCR's stock nearly exhausted and lack of convoys because of land routes closure(P888,p.3), and Serb blockage of UNPROFOR freedom of movement forcing UNPROFOR to use Igman road, where convoys were targeted nightly by Serb gunners(P822,pp.1,3), unresponsively stated movement restrictions must have been agreed at a higher level, and were "not within [his] purview", and that he was unaware of the land route closures:T.31238-31239. Asked by Chamber whether he was aware all land routes to Sarajevo were closed, said "Nobody informed me of that":T.31244.
Other credibility/reliability issue	
Claimed target of G10 was Aleksa Šantić School, a "training centre for Muslim special units" in the centre of Hrasnica, located near the enemy brigade command:D2562,para.108. Later stated the target was "the main command post" and located next to school, and that he personally determined the target:T.31258,31262. Contradicted by his commander D.MILOŠEVIĆ who testified that target was chosen to neutralise four mortars:T.33162,33171,33176. Confronted with RADOJČIĆ's contradictory evidence, D.MILOŠEVIĆ stated RADOJČIĆ knew "what we had agreed upon" but that his testimony "may be a result of his faulty memory or something else which guided him in his testimony":D.MILOŠEVIĆ:T.33182.	
Blaško RAŠEVIĆ	
Claim contradicted by own statement	
Claim	Contradiction

<p>Denied having received or issued orders to shoot at civilians and civilian targets:D2527,para.21.</p>	<p>Testified they were targeted by Bosnian mobile mortars, and from firing positions which—while camouflaged in a number of civilian facilities—were visible as weapons there opened fire:T.30915. While initially asserting they would not engage any kind of mobile mortars, then contradicted this initial denial by saying they did respond to those that fired from “different kind of positions,” on the basis of superior command’s decision:T.30916. Would use a Browning, the biggest piece they had, in order to “make them run”:D2527,para.23;T.30915-30916.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim “We never opened fire at civilians in Sedrenik”(D2527,para.29); was there “non-stop” at the lines and to his knowledge, SRK never fired from Špicasta Stijena at all:T.30917.</p>	<p>Contradiction Confronted with 5-Mar-1995 UN report regarding F17, stating two civilians had been wounded from fire from Serb positions on Špicasta Stijene(P1619) and 22-Aug-1995 UN report stating the VRS fired shells from Špicasta Stijene toward downtown Sarajevo(P6028), maintained his unit never opened fire at civilian targets and he was no longer there at that time so could not comment on things he hadn’t seen. He then nevertheless stated his unit never opened fire at the civilian population, except where they had observed their machine-gun nests or mortars:T.30917-30920.</p>
<p>Other credibility/reliability issue</p>	
<p>Denied knowledge of his appointment as a member of the War Commission for the Serbian municipality of Sarajevo Centre by KARADŽIĆ’s order of 21-Jul-1992:P6027;T.30913.</p>	

<p>John RUSSELL</p>	
<p>Claim contradicted by own statement</p>	
<p>Claim “Based on the evidence available at the site, the minimum and maximum range at which the weapon system could have been fired, straddles the confrontation line”:D2367,p.2. Asked how he measured the angle of descent in order to assess range, could not remember but agreed he most likely used his normal method of inserting a 12-inch nail into the hold and using a protractor to determine the angle:T.29389-29390. Mortars found in the basement where Bosniaks kept</p>	<p>Contradiction Confronted with his statement “I do not believe that re-inserting the tail fin into the hole would provide an accurate measurement of the angle of descent since the hole had been disturbed in the intervening period”(D2364,para.25), agreed this was the same as his own procedure of inserting a nail into the hole and therefore that his statement(D2364,para.25) was “not entirely clear”:T.29392-29393. Admitted he saw no writing or identification marks on the mortars in the</p>

ammunition and the tail fin of the mortar found at the market were similar:T.29401-29402;D2364,para.37.	basement whereas he knew the stabiliser found at the market place had writing on it:T.29402. Confronted with the fact that the report from his visit to the basement concluded the tail fins of the mortars at the market versus those in the basement were different(P1441), had “no problem” accepting the report “which identifies batch lot numbers and stuff on the primer and the fuse. I didn’t look at that”:T.29403-29404.
Claim contradicted by other reliable evidence	
Claim	
Diary entry stating his belief that “the BiH shot at themselves”(D2366) was based on his assessment that the angle of descent was steep, and his belief that a steep angle meant a closer firing point:T.29395-29397.	Contradiction Confronted with firing table for the shell in question(P5921) showing that, based on witness’s assessed angle, the shell could have been fired from between 900-4800m, depending on the charge, agreed that, had he applied the correct principle (as the charges increase the distance increased) he would have reached a different conclusion:T.29396-29400.
Other credibility/reliability issue	
Admitted his conclusion that “the BiH shot at themselves”(D2366) was “just my own personal feeling”, conceding the facts in the report did not prove that an individual side fired:T.29406.	

Desimir ŠARENAC

Claim contradicted by own statement	
Claim	
He marked confrontation line, deployment of ABiH forces, and weapons on map(D3091) “[B]ased on the information I had. I spent a number of years along that line, and it all remains vividly in my memory. I’ve also reminded myself only recently of it. That is why I was able to reconstruct the position of these elements. Perhaps I was off by a couple of dozen metres, but this is what it was like”:T.34935,34938.	Contradiction Testified he refreshed his memory by consulting documents because: “I had forgotten all of it”:T.34955. Confronted with map of shelling and sniping incidents in Dobrinja(P1739), implied a marking was incorrect and admitted he marked the map without “precise information”, stating it is “only natural after 20 years that I cannot find it in my memory exactly”:T.34960-34961.
Affirmed that markings he made on map(D3091) indicating location of light artillery battalion at school for dental technicians in Bjelave were based on verified information:T.34964-34965.	Unresponsive when asked location of school for dental technicians:T.34965. Confronted with different map(P6186) showing the dental technician school located on other side of Bjelave, responded: “I’m just saying that it was in the medical school, but the symbols were not shown in the exact positions”; that doesn’t change the fact that “they were there”:T.34966-34967.

Other credibility/reliability issue

Asked about ABiH forces with which he engaged directly in Sarajevo, alleged Muslim media reported ABiH having 120,000 armed combatants in the city:T.34926-34927. Challenged on this figure, insisted this was “their” (Bosnian) number and he had no “possibilities” of checking accuracy:T.34969. Confronted with dramatically lower number provided by his own superior SLADOJE, simply continued to focus on the alleged figures in the media:T.34969-34970.

Milorad ŠEHOVAC**Claim contradicted by own statement****Claim**

Confronted with the fact that despite a lengthy recitation of his military career, his statement omitted his time in Brčko in 1992 when, according to the *Krajišnik* Trial Judgement, he ordered the murder of a detained Croat, claimed: “I didn;t skip anything. In paragraph 2 of my statement I stated exactly the period when I was in Brcko, from mid-August 1991 until 15-Aug-1992”:T.31350-31355.

“We never attacked a Muslim-populated area. Ahead of the defence area of the brigade, the only Muslim settlements were Butmir and Hrasnica, and we never had any ambition to attack them nor did we attack them”:T.31344.

Regarding G10:“According to my information, a modified aerial bomb was fired on the *Aleksa Šantić* School, where shells were being produced for the use of the 1st Corps of the BH Army.”D2633,para.63. Emphasised in testimony that a document he wrote describing military targets in and around Hrasnica from August 1994(D2353), which names the Aleksa Šantić School as a place of “shell production,” “relates to” the order, eight months later, to fire an MAB on that area(P1201), stressing that “nothing changed from the moment when I sent my analysis to the moment the bomb was launched. All that time ammunition was being manufactured there”:T.31364-31366.

Claimed to have “some unofficial information” that some

Contradiction

Confronted with his statement(D2633), first avoided answering questions about its content(T.31358-31359), then admitted the statement does not mention Brčko at all:T.31359-31360.

Admitted an MAB was fired on a target in the “centre of Hrasnica”:D2633,para.63.

Stated the reason for the order to fire the MAB was not to target the school itself, but rather “to respond to enemy fire from Sokolović Kolonija and Hrasnica” and that this is “also explained by” D782, issued two days before the MAB was fired, which “concerns neutralisation in the event of fire from enemy mortars and artillery”:D2633,para.63. Stated: “The rule is that larger-calibre artillery are used to neutralise smaller-calibre artillery in combat” and asserted, with no support, that “there were mortar and artillery firing positions” in the “immediate vicinity” of the school:D2633,para.63.

Did not contest contents of forensic on-site investigation of the attack(P1798)

<p>soldiers had been killed in the G10 air bomb attack:T.31369.</p>	<p>indicating the individual killed was a Muslim woman, but instead blamed ABiH brigade commander for not “eliminat[ing] civilians from his deployment sector”:T.31370.</p>
<p>Regarding G10:“According to my information, a modified aerial bomb was fired on the <i>Aleksa Šantić</i> School, where shells were being produced for the use of the 1st Corps of the BH Army”:D2633,para.63.</p>	<p>Acknowledged the bomb had not hit the school(T.31367), and did not dispute that only one bomb was fired:T.31372. Admitted that if he commanded a unit being threatened by a target, and a first attempt to eliminate the target failed, he “would order continued action until the target is neutralised or destroyed”:T.31373. Further acknowledged that if the meaning of the order in G10 was its literal, plain meaning—“to launch one aerial bomb at a target in Hrasnica or Sokolović Kolonija where there will be the greatest human and material losses”—then the mission was accomplished:T.31371.</p>

Srdan ŠEHOVAC

Claim contradicted by own statement	
<p>Claim</p> <p>Claimed SNB used “well-known police methods”, which he defined as those used by “all police forces and courts in the world”(T.32989,33009), and claimed SNB did not use “any repressive measures”(T.33031-33032), or “beat people up”:T.33045.</p>	<p>Contradiction</p> <p>Confronted with prisoner’s report that he was beaten by his police interrogators in the presence of Mladen BAJAGIĆ, who witness confirmed was an SNB operative(T.33009), implicitly agreed this occurred at a time when BAJAGIĆ was helping the MP conduct interviews, but claimed BAJAGIĆ was “not the sort of person who would have done that”:T.33032-33033. Admitted he was once present when an interviewee was slapped:T.33035.</p>
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>“[B]y tying their flags together,” Muslims and Croats made clear they would act jointly against Serbs and that living together was no longer an option:D2852,para.10,36A;T.33035-33037.</p>	<p>Contradiction</p> <p>Confronted with MLADIĆ diary entry of 18-Aug-1992(P1479,p.76), in which KARADŽIĆ discussed cooperating with Croats and negotiating a separate peace, avoided question and instead discussed the Croats in Kiseljak who “disobeyed the policy” and refused to fight the Serbs:T.33037-33039.</p> <p>Confronted with his own report of 3-Jun-1993(P6095,pp.5-7), agreed SNB was working to fan conflict between Croats and Muslims, but denied this contradicted his claim those parties were allied:T.33039-33042.</p>
Other credibility/reliability issue	
<p>Asked why only a few of his intelligence reports and interviews(D2853-D2893) affirmatively stated the information had been verified(e.g.</p>	

D2859), was defensive and avoided directly answering the question, instead responding vaguely that his reports were “mostly supported by facts”:T.33013-33016.

Savo SIMIĆ	
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>“As far as I know, the SRK was surrounded doubly, internally and externally”:D2412,para.14.</p>	<p>Contradiction</p> <p>Asked to circle the areas he described as internally encircled on a map, drew red lines at three locations, none of which were entirely enclosed:P5978;T.30029. Asked to then circle the areas he referred to as externally encircled on the same map, drew two blue lines through areas north of Sarajevo, neither of which were enclosed in any way(P5978;T.30029-30030), insisting that “the SRK was encircled as well as the Muslim forces”:T.30033. Judge Kwon asked “you wouldn’t deny the ABiH inside Sarajevo city was also encircled by the SRK?”, answered “[i]n the beginning I said that everyone had—everyone else in an encirclement, everyone was encircled. What does that mean—or rather, there was a semi-encirclement”:T.30033-30034.</p>
<p>He never heard of any cases involving a few outgoing shells from Sarajevo responded to by a large number of VRS shells incoming into Sarajevo, and (at least in the second half of the war), the ABiH fired more shells at the SRK than vice-versa:T.30059.</p>	<p>Confronted with Dragomir MILOŠEVIĆ’s statement that at the beginning of the war “we used massive artillery at a time when the enemy had just a few mortars and the occasional gun”(P2668,p.1), admitted “I’m not disputing the fact that it was disproportionate at the beginning of the war [...] but gradually they armed themselves in various ways”:T.30082. When further pressed on MILOŠEVIĆ’s reference to SRK firing at inhabited settlements when there were no combat actions(P2668,p.1), admitted there were “probably cases, as stated in this document, where certain troops spent more ammunition than necessary and they probably targeted targets that they shouldn’t have”:T.30083-30084.</p>
<p>The term “fire control” in SRK documents refers to keeping a road constantly under fire to keep it under one’s control(T.30060), but this would be unlawful in the context of a road within a densely populated urban area: “All the streets, all the roads, are used by the inhabitants, by civilians, so it wouldn’t be lawful to fire on the civilians, to fire on those streets; and we didn’t act in this way”:T.30061.</p>	<p>Confronted with SRK order to place a major part of Stari Grad under “fire control” as part of operation “Talas 2”(P5940), and despite plain language of the document, insisted that in order to control fire coming from Stari Grad, it was necessary to improve their tactical position to prevent forces inside Stari Grad from taking action:T.30085. Stated you could have “control” without “fire”, and proceeded to interpret P5940 by explaining the language establishing fire control did not refer to artillery fire but to “control that</p>

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	<p>part”:T.30085-30088. Reminded he had named no military targets in Stari Grad in his statement(D2412,para.23), suddenly alleged mortar fire was opened from Bistrik and “the other side” of Sedrenik against Serb positions:T.30089.</p>
<p>Regarding UNPROFOR monitoring of SRK artillery, “there’s nothing that can be concealed”:T.30063.</p>	<p>Confronted with SRK order calling for removal of guns to new firing positions where they will be camouflaged, referring to their concealment from UNPROFOR(P1670); MILOVANOVIC’s order to put inoperative weapons at disposal of UNPROFOR to disguise their intentions(P847); order to prevent UNPROFOR observers from coming to SRK artillery positions to collect data(D312), claimed he did not hide his weaponry but was not in a position to know what others did:T.30068.</p>
<p>He never received or heard of orders to shell Sarajevo as punishment for ABiH military manoeuvres elsewhere or for outgoing shelling:T.30059.</p>	<p>Confronted with 25-May-1992 intercept in which MLADIC threatened “Sarajevo is going to shake”(P1041), stated he did not know whether such an order had been issued and did not fire in that way:T.30070-30071. Shown further intercepts(P1518;P1511;P1521) and videos(P931;P932) establishing a heavy SRK bombardment at that time, avoided responding as to his knowledge of the incident but focused on the intention of Muslims to break through in May 1992, saying “[s]o there was fire in retaliation and there were probably civilian casualties”:T.30078-30079.</p>
<p>Apart from seeing MABs used twice in 1994(T.30090-30091;D2412,paras.21-22), he was not involved “in any shape or form” with them:T.30091.</p>	<p>Confronted with Dragomir MILOSEVIC’s 11-Jul-1995 order to him to obtain MABs and prepare for their deployment(P1300), explained: “I’m not contesting that I may have been involved in the planning and delivery of those air bombs”:T.30120.</p>

Milorad SKOKO

Claim contradicted by other reliable evidence	
Claim	Contradiction
<p>There were never any decisions, orders, or any other instructions to cut off power supply to Federal Sarajevo deliberately:D3321,para.14.</p>	<p>Confronted with 26-May-1995 UNPROFOR code cable regarding weekly situation report from Sarajevo(P6274,p.3), showing electricity supply to the city was cut, stated the document did not show anything, because it uses the words “it appears that Pale authorities made a political decision to cut electricity supply along the Vogošća and Rejjevo lines”:T.36743-36744. Confronted with 28-May-1995 UNPROFOR report(P6275) stating Serbs had cut water and electricity to Sarajevo, did not deny its contents, simply stating</p>

<p>There were no systematic obstructions by the Bosnian Serb side regarding repairs to electricity lines:T.36735.</p>	<p>the document did not state the reasons or mention any orders:T.36745-36747. Confronted with July 1993 UNPROFOR report(P6270,p.1) stating “Serbs denied any access to the repair location on the line which is supplying the town (Reljevo/Vogosca)”, stated he did not know what was meant by the term “Serbs”:T.36735. Confronted with-Feb-1994 UNPROFOR report(P6271) stating “Pale” had not given clearance yet to a repair mission, claimed the reference to Pale referred to the Elektroprivreda headquarters:T.36736-36737. Confronted with another UNPROFOR report from October 1994(P6272) stating KARADŽIĆ had agreed to clear access for a repair team, claimed “repairs of the electric power network never required an approval of President Karadzic”:T.36737-36740. Confronted with October 1994 UNPROFOR report(P6273) stating Bosnian Serb authorities blocked the transport of oil needed for repairs unless 50% of the oil was given to the Serbs, claimed he knew nothing about this:T.36738-36740.</p>
<p>Other credibility/reliability issue</p>	
<p>Knew nothing about Sarajevo being without electricity for 140 days in 1993, including 53 consecutive days:T.36731. Confronted with an excerpt from “Elektroprivreda BiH” 1993 annual report(P6269) containing this information, claimed the information was manipulated and that 140 days without electricity was “impossible”, while admitting “I did not count the days during 1993”:T.36730-36732.</p>	

Dušan ŠKRBA

<p>Claim contradicted by own statement</p>	
<p>Claim</p> <p>“I had information that city hall had been turned into an ammunition depot”:D2341,para.18.</p>	<p>Contradiction</p> <p>Admitted his only source of information for this claim was television footage depicting people walking around in the vicinity of this location carrying ammunition:T.29150-29151.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>Regarding G7, no fire was opened on 4-Feb-1994 from 120mm mortars. If it had been, UN observers on duty at his command post (Lima 5), would have heard the firing of a shell and reported it:D2341,para.21. His unit would inform UN observers every time a round was fired, observers were constantly present 24 hours a day, from 1-Jul-1992 until the</p>	<p>Contradiction</p> <p>Confronted with evidence of senior military observer stating: “On several occasions I personally brought such pressure to bear on the local commanders concerning firing on the city. On occasions I received answers that I regarded as unsatisfactory. I received answers that were trivial, such as the commander telling me at the Lima 5 position, when firing his mortar rounds, that he was ‘warming the barrels.’ [...] The rationale for firing the weapon was irrational</p>

end of the conflict, and never objected to him or disagreed with his reports:T.29153-29155.	and vague; I don't think there was a specific target”(P1426,para.80), simply denied the evidence and asserted UNMOs could “see [...] where the fire went”:T.29154-29156.
Other credibility/reliability issue	
Made the absurd claim that his unit did not fire within 1km of hospitals, railway stations, bus stations or any other area where civilians tended to gather:T.29131-29132.	

Miloš ŠKRBA	
Claim contradicted by own statement	
Claim	Contradiction
There were no mortar positions in the village of Studenkovići(D2344,para.10), nor were there any artillery weapons or mortars between Petrovići village and Sarajevo city for the entirety of the war:T.29209.	Denied knowing about the placement of artillery and mortars, saying “I’m not an artillery man” and “There is really nothing that I could tell you with any certainty about such matters”:T.29214.
Claim contradicted by other reliable evidence	
Claim	Contradiction
The circled area along the winding road marked with a square on D2346, just to the southeast of Palez (as shown on P5942), indicates the approximate placement of an 82mm mortar in August 1995; this was the only mortar position in the vicinity, and there were no 120mm mortars in that area:D2344,para.10.	Confronted with SRK documents establishing that: the location around Palez had numerous SRK artillery units(P5942); forces would be supported by 82mm and 120mm mortar batteries from the sector of Trebevic-Palez(P5940;P5941); then confirmed the time period he was referring to was when he was commander (late 1992-1993) and conceded he did not know about mortar positions in 1995:T.29198.

Mile SLADOJE	
Claim contradicted by own statement	
Claim	Contradiction
Made the facially illogical assertion that no one controlled the checkpoint that he acknowledged existed at Kasindolska street, within his battalion’s area of responsibility:T.30564.	Later contradicted himself by implicitly acknowledging that Kasindolska checkpoint was operated by his battalion, stating, it was manned from time to time. There wasn’t any need for someone to be there all the time because our positions were nearby”:T.30581.
Initially asserted he was unsure that G5 even happened, then indicated it was “staged, rigged”, and he suspected that the shells were fired from Muslim positions at Butmir:T.30574-	Admitted “I did not investigate the matter and also I did not have an opportunity of seeing any kind of ballistic findings”:T.30575.

30575.	Asked to confirm he had “some experience with mortars”, evasively answered “I don’t know”(T.30575), despite his evidence that he had occupied various SRK command positions throughout the war and completed his JNA service in artillery:D2479,paras.1,5.	Further pressed, made clear he did, e.g., “Of course I know how a mortar fires” and that he was not a “layman”:T.30575-30576.
His battalion stopped a French battalion convoy and confiscated flak jackets “intended for the Muslim forces”:D2479,para.23.	Acknowledged the flak jackets were the French battalion’s property and justified his “intended for the Muslim forces” claim by claiming there was no need for the French to transport these flak jackets into Sarajevo because it was deployed at the airport. Admitted the flak jackets were never returned but were “of course” used by Serb soldiers:T.30581-30582.	
Other credibility/reliability issue		
Claims that humanitarian aid did not get through to the city because the “criminals” were not interested in vast delivery of humanitarian aid that would result in price drop on the black market(D2479,para.24), a suggestion that inverts responsibility by ignoring that Serb blockade of the city and consequent shortages created the captive market of its residents and a lucrative environment for black market profiteers.		

Mirko SOSIĆ		
Claim contradicted by own statement		
Claim	Events in the film “Sarajevo: the truth covered in silence” “have already been accepted by the Trial Chamber [...] under exhibit numbers D130, D131, D132 and D133”:D3138,para.5.	Contradiction Admitted he was not shown any part of this film by the Defence; knows only that the exhibit numbers in his statement relate to the movie, “otherwise they don’t mean anything to me”:T.35779.
“I personally saw on several occasions a cannon from which they often fired. They would do this by pulling the cannon out of the underground area below the entrance to the emergency ward, firing two or three projectiles and then hiding the cannon again underneath the emergency ward”:D3138,para.9.	Asked to confirm he never actually saw the cannon firing, avoided answering, eventually stating “I cannot say”:T.35773-35774.	

Božidar TOMIĆ		
Claim contradicted by own statement		
Claim	Not aware of any breaches of Geneva Conventions in his	Contradiction Acknowledged using Kula prisoners to work on the front line in immediate

unit:T.30199-30200.	vicinity of opposing line in an area he had earlier acknowledged was particularly dangerous:T.30181,30202-30205.
Claim contradicted by other reliable evidence	
Claim	Contradiction
Serb TO from Vraca did not participate in any offensive operation in Grbavica:T.30170-30171.	Shown a contemporaneous 21-Apr-1991 intercept where Momo GARIĆ states everyone from Vraca and the surroundings is participating in a Grbavica operation(D1202), implausibly claimed “that couldn’t have been done”:T.30171-30178.
The 2 nd battalion had no mortars of greater calibre than 60mm:T.30185.	Confronted with documents establishing the 2 nd battalion had 82mm mortars and shells:P5983-P5985.
Took UNMO’s to alleged Serb firing positions where they were assured the Serbs had not fired; UNMO’s had no complaints about his unit:D2418,para.23.	Shown UNMO report describing Serb forces obstructing UNMO access to an alleged Serb firing position in area of witness’s battalion(P1822), stated he was unfamiliar with the incident and could not comment:T.30213-30214.
Did not advocate preventing the return of Muslims to Grbavica post-Dayton:T.30196.	Shown record of witness seeking “[g]uarantees that the Muslims and their police and authorities will not come”(P1489,p.170), claimed he was only referring to preventing the return of Muslim police and authorities to Grbavica and “maybe this was wrongly recorded”:T.30197-30198.
Other credibility/reliability issue	
Claimed he would be “grateful” if IZETBEGOVIĆ had made a speech about the Serbs similar to KARADŽIĆ’s October 1991 speech warning the Muslims of possible extinction if it came to war:T.30156.	
Evasive, e.g. stated he was given weapons/tasks at the TO headquarters, but persistently refused to acknowledge the identity of those issuing weapons/tasks:T.30161-30164.	

Predrag TRAPARA

Claim contradicted by own statement	
Claim	Contradiction
Humanitarian relief to the Muslim part of Sarajevo passed through the witness’s zone of responsibility, and his unit always let such humanitarian relief pass through:D2389,para.17.	Confronted with GŠ order to ban movement of humanitarian aid convoys(P879), explained that it was the MP that would stop convoys, he did not have a MP unit, he “did not have much influence on convoys”, and did not receive orders related to humanitarian convoy movement(T.29924-29935).
Claim contradicted by other reliable evidence	
Claim	Contradiction
Did not accept that “within the 1st Sarajevo Mechanised	Confronted with P5930 showing 1st Sarajevo Mechanised Brigade in

<p>Brigade there were considerable quantities of sniper weapons and optical equipment and silencers for sniper rifles":T.29918.</p>	<p>possession of "rifles with optical sights, semi-automatic rifles with optical sights, machine-guns with optical sights, other sniper rifles, passive infrared sights, sniper rifle silencers", claimed his denial only related to his company and the one next to his:T.29919-29920.</p>
<p>Other credibility/reliability issue</p>	
<p>Was arrested for illegally transporting military weapons on 16-Oct-1991 but denied knowing the contents of the lorry he was in, along with his uncle and another relative:T.29909-29918. Asked why he was involved in transporting these weapons, stated he wanted to protect himself and his family because "our people", referring to Serbs, were afraid; asked whether these weapons were intended for distribution to Serbs, responded "I couldn't say yes, but probably":T.29917-29918. See also P5977.</p>	
<p>Miladin TRIFUNOVIĆ</p>	
<p>Claim contradicted by own statement</p>	
<p>Claim</p> <p>His unit had 120mm and 82mm mortars for support:D2444,para.6.</p>	<p>Contradiction</p> <p>Confronted, conceded they also possessed 105mm and 122mm howitzers:T.30381,30384.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim</p> <p>Never "aware" of the idea that parts of Sarajevo not populated predominantly by Serbs should be taken:D2444,para.16.</p>	<p>Contradiction</p> <p>Confronted with his report to SRK that future operational plans include "čišćenje" of Ugorsko, Menjak, and Barica(P5997), admitted that "Ugorsko, Menjak, and Barica were inhabited by Muslims":T.30393.</p>
<p>There were several paramilitary units in Vogošća and the civilian authorities, with the help of his units, took steps to "'get rid' of them because no unit wanted to include them into its ranks":D2444,para.21.</p>	<p>Confronted with list of Boro RADIĆ's paramilitary group members(P2366) and Vogošća Brigade command order disbanding RADIĆ's "intervention platoon"(P6002), conceded members of RADIĆ's group later joined the Vogošća Brigade:T.30447-30449.</p> <p>Confronted with 27-Jun-1992 request to War Commission for issuance of a vehicle to a member of RADIĆ's unit(P6001), conceded this was the same local authority he stated was trying to get rid of RADIĆ's group, but that he was otherwise unfamiliar with the request:T.30446.</p>
<p>Other credibility/reliability issue</p>	
<p>Confronted with documents and written statements showing prisoners, sometimes on his orders, were forced to carry out work on front lines and in combat areas(P45;P46;P1144;P2361;P2383;P2385;P2387;P2392;P5999;P6000), conceded prisoners were forced to work on front lines but attempted to justify it by asserting Serb forces were also there ("we were all exposed") and acts taken to fortify positions were "not directly</p>	

related to war operations”:T.30398-30414.

Slobodan TUŠEVLJAK	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>“We were careful not to target civilian objects in the zone of responsibility of the unit of the [...] BH Army that we fought against”:D2391,para.19. Describes a 12-Jun-1992 ABiH attack from mortars mounted on moving railway cars in the Pofalići area and says: “We responded to the attack because we received support from the rear”:D2391,para.12.</p> <p>Regarding F4, stated “no line-of-sight existed between our positions” and the scene of the incident:D2391,para.25.</p> <p>Regarding F10, claimed “no line-of-sight existed between our positions and this spot”, and that the distance was over 1,200m and his unit did not have weapons with that range:D2391,para.25.</p>	<p>Admitted the information that they were fired upon from railway cars only reached them from Serbs who crossed over from Muslim territory after the day of attack(T.29953-29954); asked how firing into a civilian area at targets that were only identified after the day of the attack reflected careful avoidance of civilian objects, simply said it was not his unit that fired:T.29954-29955.</p> <p>SRK had a line of sight. Shown photographs confirming a line of sight from Ozrenska Street to incident location(D2430;D2431), clarified that the photo was taken from territory occupied by the 2nd Company of the 2nd Battalion, 1st Sarajevo Mechanised Brigade, not his own 4th Company:T.29956-29957.</p> <p>Agreed that in 2000 Ozrenska street was visible from the incident location:T.29957-29958. Shown D2396, confirmed his platoon had M84 and M53 machine guns:T.29942-29943. Reminded of this evidence, agreed 1,200m was within the range of both weapons but said optical sights were needed to acquire a target at that distance, which they did not have for either gun:T.29959.</p>

Stevan VELJOVIĆ	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>On 7-Aug-1995, was appointed commander of a newly-formed brigade which included the Trebević battalion. Brigade had 120 and 82mm mortars in the Brus sector (see location Brus on Trebević:P2114.p.7). Around 24 August, under SRK Command orders, dispatched an intervention platoon and the entire 120mm and 80mm mortar battery to the Trebinje front:D2351,paras.28,30,31,34.</p>	<p>Contradicted his own written evidence by claiming they had no mortars on Trebević in 1995 because it was covered by forest, and that these weren't suitable firing positions. Immediately contradicted himself again, stating the mortars (which he had just given evidence weren't there in the first place) were “withdrawn because there was an order from Čedo SLADOJE, according to which some of the SRK forces should be sent to Trebinje”:T.29262-29263. Defence witness Jovan SARAC gave contradictory evidence that on his personal intervention in August 1995 KARADŽIĆ ensured the Trebević</p>

	battalion remained at Trebević:T.47160.
	In any event, VELJOVIĆ's inconsistent evidence as to the location of his brigade's mortars in the Brus sector is irrelevant to G19, as Brus is well outside the assessed direction of fire for that incident.
G10 never happened:T.29271-29272,29275-29277.	Shown SRK daily combat report(P1782), GŠ report(P5943) (copied to KARADŽIĆ) confirming SRK forces in Iliđa had fired a 250kg airbomb on the centre of Hrasnica (G10), insisted this incident didn't happen because, according to him, UNPROFOR didn't register it(T.29272-29273), and only UNPROFOR could confirm whether this happened:T.29274-29275. When Judge Kwon asked him to confirm his position that these two reports were lies, retreated from his denial claiming "I don't know [...]" but maybe. That moment I was not there so I was in no position to know that that bomb was launched":T.29276.
	Denial also contradicted by Defence witness Milorad ŠEHOVAC, who testified he saw G10 with his own eyes from his OP(T.31366); and by Defence witness Vladimir RADOJIĆ, who admitted his forces fired this air-bomb:T.31254-31257,31259,31261-31263,31267-31269.

Mihajlo VUJASIN

Claim contradicted by own statement	
Claim	Contradiction
The SRK's Rajlovac Brigade, where he was deputy commander, did not have any rifles that were used for sniping:T.31790-31791.	Acknowledged several soldiers had rifles with optical sights attached and that the Brigade also had M-76 and M-48 rifles, which could be used as sniper rifles but the "unit as a whole" did not possess sniper rifles:T.31791-31793.
Claim contradicted by other reliable evidence	Contradiction
Claim	Confronted with D.MILOŠEVIĆ's order concerning Talas 1, providing that the organisation of positions for designated artillery pieces "shall be directed by Major Mihajlo VUJASIN and Dušan VUKADIN" and for preparation of launchers for "aerial bombs"(P1309,p.2), responded "[w]e needed to make parapets. Now, whether someone indeed intended to use them, that's
Unaware of SRK Command's plan to use MABs in connection with the Talas 1 offensive in April 1995:T.31797.	

<p>“The SRK mostly defended itself,” referring only to one Rajlovac Brigade tactical operation aimed at “liberating Serbian houses near Muslim positions in Sokolj, when 13 people were killed.” During rest of war, the Brigade “was engaged in defence and carried out defensive operations”:D2686,para.18.</p>	<p>something I can't say”:T.31795-31797.</p> <p>Acknowledged an attack order including aggressive language to “launch a fierce attack and take control of the villages,” to “cut off the village, surround the enemy forces [...] and] thoroughly mop up”(P6067,pp.2-3) referred to the operation to liberate Serbian houses mentioned in his statement:T.31798-317801;D2686,para.18.</p> <p>Asked about the Rajlovac Brigade’s military action against Ahatovići, when he was deputy commander, refused to characterize that action as “offensive” because it was a “mixed population” village:T.31802-31805. Further claimed that those detained in this action were held for their own protection:T.31804-31806.</p>
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Dušan ZUROVAC

Claim contradicted by own statement	
Claim	Contradiction
<p>Sarajevo was not under siege, encircled, or otherwise contained by the SRK; it was “closed from the inside” by “criminals who became high-ranking officers in the [ABiH] overnight”:T.30290-30291.</p>	<p>Confirmed that ABiH “provocation” was, in fact, an effort to break the SRK’s siege of Sarajevo:T.30294.</p>
Claim contradicted by other reliable evidence	
Claim	Contradiction
<p>Lack of food and supplies was not one reason ABiH attempted to break the siege because “Sarajevo had a tunnel under the airport and that through that tunnel they transported not only food and footwear and clothes, but even weapons”:T.30295.</p>	<p>Confronted with June 1993 UNHCR report that Sarajevo was surviving due to air lift flights providing 44,000,000kg of humanitarian relief supplies, and condemning “those who are blocking the delivery of food, medicine, fuel, water, power, gas, and other humanitarian assistance in a cowardly attempt to starve and kill innocent civilians”(P5988), admitted “[i]n Sarajevo people who were starving included Serbs, Muslims, and Croats”:T.30296.</p>
<p>Stated that “[f]rom August 1993 until the end of the war” the ABiH “had superior fire-power, not only superior manpower”:T.30285.</p>	<p>Confronted with SRK Command map showing the SRK had far more tanks, howitzers, and mortars of all sizes than the ABiH(P5990), said his previous comments were only about infantry weapons:T.30302-30303.</p>
Other credibility/reliability issue	
<p>Claimed the term “active defence” “doesn’t contain the idea of [...] offensive action”:T.30299. Defence witnesses testified that “active defence”</p>	

implies offensive action: e.g. S.GALIĆ:T37900(“most [...] forces are engaged in the defence, and rest of the forces are engaged in attack”);S.SIMIĆ:T.30037-30038(referring to Lukavac 93—called an “active defence” in an SRK order(P5981,p.3)—as an “offensive [...] to prevent the unblocking of Sarajevo”).

Claimed there were no snipers in his company(T.30309), and maintained this position despite December 1994 document(P5991,pp.2,6) showing at least two members possessed sniper rifles, which they took from the unit when deserting:T.30309-30315.

Srebrenica

Svetozar ANDRIĆ

Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Handed over duty as Commander of the 1st Birač Infantry Bgd on 6-Aug-1995; appointed DK Chief of Staff on 8 August:T.41649;D3886,paras.1,26;D3889.</p>	<p>ANDRIĆ appointed DK Chief of Staff on 13-Jul-1995(P4485); Ljubomir VLAČIĆ appointed commander of the 1st Birač Infantry Bgd as of 15-Jul-1995(P6453); VLAČIĆ signed (as Commander) 1st Birač Infantry Bgd documents dated 22-Jul-1995(P6454) and 25-Jul-1995(P6455); ANDRIĆ signed (as Chief of Staff) DK Work Plan dated 28-Jul-1995(P6456):T.41650-41658 (testified he signed it retroactively, when he “arrived on the 8th”:T.41659); ANDRIĆ signed (as Chief of Staff) DK Order, 3-Aug-1995, (P6457); maintained his claim even in the face of this evidence:T.41660.</p> <p>ANDRIĆ reported, on 2-Mar-1993, that the village of Gobelji had been “burnt” and that “tomorrow the plan is to do Paljevine”(P3162,p.1); testified that Gobelji had already been destroyed in previous action by shells(T.41697-41699), but his report of 2-Mar-1993 said it had been destroyed “in the course of the day”:P3161.</p>
<p>The village of Gobelji was demolished during battle with “Muslim” units:D3886,para.8.</p>	<p>On 8-Feb-1993, at a moment when there were no ABiH attacks taking place, ŽIVANOVIĆ encouraged GABROVIĆ to burn “as many as possible” “Turks” houses in the area(P5261) (claimed burning, shelling and destruction that happened was of combat positions, after the people had already left:T.41699-41703.</p>
<p>Burning homes to force the Muslim population out of Podrinje was not a strategy of the DK, the Birač Bgd, the Supreme Command or the Main Staff:T.41699-41703.</p>	<p>Claimed to be unaware that within days of his 28-May-1992 order (P3055) 4,000-5,000 Muslim civilians were forced out of Zvornik(T.41666); over 700 men were separated and taken to the Karakaj technical school on 1 June(T.41667); over 20 male Muslim villagers were executed in Drum(T.41670-41672) and Muslims were detained in the Gradina operations and their houses burned:T.41673-41674.</p>
<p>D3887 “reverses” P3055 of 28-May-1992 (“6. The moving out of the Muslim population ... men fit for military service are to be placed in camps for exchange”), because the Zvornik TO Command did not place the cited units under the command of the Birač Brigade and ANDRIĆ had to “ask” not “order” the TO Commander to carry out actions in “coordination” with the VRS:D3886,para.3. D3887, an “order of a request nature” “proves” that P3055 was not implemented:T.41665-41666. Item 6 “referred only to those Muslims who expressed their wish to move out”:D3886,para.4.</p>	

Zvonko BAJAGIĆ	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Went to Pale on 13 or 14-Jul-1995 to see KARADŽIĆ about the Muslims being bussed out of Srebrenica in 1995:D3853, para.36. At that time, he had no information that any people from Srebrenica had been killed:D3853,para.36B.	Acknowledged that on 13-Jul-1995:(1) he stopped at the Nova Kasaba football field where one of his companions took photos of prisoners(T.41148-41156); (2) in Srebrenica he met MLADIĆ and SALAPURA as depicted in the Srebrenica trial video(P4201,part 3,00:01:39-00:02:31;P4202,p.115;T.41156-41160); (3) Tomo KOVAČ and MLADIĆ met at his house:T.41161-41163. Also acknowledged he heard about the killings at Kravica warehouse the day after (14-Jul-1995):T.41170,T.41207.
Met KARADŽIĆ in Pale in the early hours of 14 July:T.41188;D3853,para.36	Confronted with KARADŽIĆ 's appointment diary(P2242,p.91) recording a meeting with BAJAGIĆ in the early hours of 15 July, and BAJAGIĆ vehicle log(P6443,p.3) showing trip to Pale on 15-Jul-1995, he still maintained, incredibly, that the meeting took place in the early hours of 14 July:T.41188-41192,T.41208-41209.
Said meeting with KARADŽIĆ consisted of brief encounter in the hallway with KARADŽIĆ angrily telling him to go home:D3853,para.36.	Confronted with KARADŽIĆ 's appointment diary(P2242,p.91) recording the meeting with BAJAGIĆ lasting 50 minutes, claimed that represented the time spent in KARADŽIĆ 's office suite, including speaking with a family member:T.41184-41185.

Vidoje BLAGOJEVIĆ	
Claim contradicted by other reliable evidence	
Claim	Contradiction
Not aware of RS/VRS policy to force the Muslims out:T.45033-45034. Never got an illegal order to force the Muslim population out of the area:T.45034.	Asked if ŽIVANOVIĆ 's order of 24-Nov-1992(P2085) to force the Muslim population to abandon the area of Cerska, Žepa, Srebrenica and Goražde was criminal, replied after judge's intervention, "this is how it may be understood", says he did not know the commander's intentions:T.45036. Dismissed OGNJEHOVIĆ 4-Jul-1994 report(P4075,p.3), on execution of crucial task, the expulsion of Muslims from Srebrenica enclave, as not concerning him at all; "not interested in history and what happened a year or two years ago":T.45046-45048.
Other credibility/reliability issue	

Asked if he stands by his statement that crimes in Srebrenica were committed by individuals and uncontrolled groups answered: “[i]t’s a possibility [...] [v]ery probably [...] it was possible in that chaos”:D4189, point5;T.45018.

Asked if over 7,000 men and boys could be rounded up, detained, transported, summarily executed and buried in four days by individuals and uncontrolled groups, said could not be the judge of what happened outside his tasks:T.45018.

Questioned about how many Muslim men and boys were detained around Bratunac on 12 and 13 July, since he was there, replied: “I did not know that and I did not have an overview of the situation”:T.45019.

Shown 25-May-1995 Bratunac Bgd Interim Combat Report under his name(P4076: “we fired a total of four 105mm howitzer shells on the town of Srebrenica at 19:07 hours”), took responsibility “partly” as Colonel LAZIĆ issued the order to him on the spot:T.45049-45051.

To **KARADŽIĆ**’s question if he knows/ learned later that there were executions in Srebrenica, said: “I didn’t know then. I don’t know now. I know nothing [...] I don’t know a thing, I really do not”:T.45086.

Ljubomir BOROVIĆANIN

Claim contradicted by other reliable evidence

Claim

Between 1700 and 1730 hours on 13 July 1995, while driving from Sandići towards Zvornik, was informed that “something terrible had happened”, so he turned around and drove towards Bratunac. Passing Kravica warehouse, he observed 20-30 bodies on the ground in front of the building. Was told a Muslim prisoner had grabbed a police officer’s gun and killed him. Was told some Muslim prisoners had been killed as a result, and these were the bodies he had seen. Was told that no police officers (only VRS) had participated:D3659, paras.26-28.

Contradiction

Accepted he was in the car as PETROVIĆ filmed the scene at Kravica warehouse on 13 July 1995(P4201) (T.39446-39447); accepted he heard automatic weapon fire(see V000-9016 at 00:36:20). Asked about the people (bodies) visible on the footage, said he did not check to see if there was anybody still alive. Asked what he did to help the remaining people that were alive in the warehouse, said “I did not do enough [...] but as I passed by here, I saw something that was done and over with”(T.39448); then said “I thought then that they were not under my authority”(T.39448). In re-examination, said on his way back from Konjević Polje to Kravica there was constant shooting from the forest, hills and on the road; there was exchange of fire. When he passed Kravica warehouse, he did not see anyone firing, or hear any firing:T.39452.

Only knew about first “wave” of killings at Kravica warehouse—when he saw 20-30 bodies. Became obvious during his trial there was second round when far more were killed:T.39454-39455. Two members of his unit took part in the first round. Did not have any specific knowledge then whether someone from his unit participated in second round. It was his information that no one did:T.39457-39458.

Three men from his unit pleaded guilty, others convicted in BiH for participating in Kravica Warehouse killings (P6378). Confronted, said “I really hadn’t heard of some of these things up until now but certainly these are facts”:T.39458-39461.

Nenad DERONJIĆ	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Denied being in Konjević Polje on 13-Jul-1995 and being one of the Jadar River executioners. Claims he was in Konjević Polje on 11 and 12 July, but that he was performing police duties in Srebrenica from the afternoon of 12 July onwards:D3760,pp.7-21,36-40,54-57;T.40698;T.40704;T.40709-40710;T.40730-40731;D3761.</p>	<p>[REDACTED]</p> <p>Confronted with documents showing members of his unit were on combat duties on 13 July in the area of Konjević Polje(D3760,pp.45-46,59-62;T.40700-40704,T.40709-40710;P6431;P4935;P5136;D3761) nevertheless maintained his position that on 13 July he was in Srebrenica and not in Konjević Polje.</p> <p>Agreed that 13-Jul entry for the witness in the Srebrenica Police Station duty roster(P6431,p.3), which indicates he was on security duty from 07:00-19:00 hours appears to have been changed, claimed it was an innocent correction:D3760,pp.40,54-62;T.40711-40713.</p>

Mendeljev ĐURIĆ	
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p> <p>Did not participate in separating men in Potočari; did not know men were being separated:D3903,para.13.</p>	<p>Shown ZAMETICA 13 July BBC interview that men were being separated for questioning related to massacres of Serbs(P6467;T.42091-42092), said did not claim it did not happen but that he “never did that, nor was [...] in the position to see or to observe anyone in my immediate surroundings doing anything like that”:T.42094-42095.</p> <p>To Judge Kwon’s question if he was saying he knew but did not do that, replied: “No, I said it may have been happening. I’m not saying it was. I’m not saying it wasn’t”:T.42095.</p>
<p>DJURIĆ’s unit along the Bratunac-Konjević Polje road on 12 July evening was not involved in any combat</p>	<p>Confronted with report of 13 July(P2987,p.2) showing that MUP unit along Konjević Polje road captured around 1500 Muslims, said his colleagues never</p>

activity(D3903,para.11); did not catch a single prisoner:T.42100.	informed him “of anything similar”:T.42100-42101.
<p>Other credibility/reliability issue</p> <p>Confirmed visiting his subordinates along Konjević Polje road, [REDACTED]</p> <p>Maintained he heard about the Kravica murders “much later”, while his commander JEVIC heard that evening, “because people were talking about it”:T.42104-42105.</p>	

Mile DMIČIĆ

Other credibility/reliability issue

Asked if he denied at trial that thousands of Muslim men were executed in Srebrenica said: “I don’t have any knowledge and I cannot accept that”: T.42902-42903. Asked if he shared the position of a **KARADŽIĆ** advisor that the Srebrenica graveyard was a farce, replied “To a considerable part, yes”:T.42903.

Shown 14-Aug-1995 AKASHI letter(P2288, p.2) saying many former Srebrenica inhabitants unaccounted for, allegations of the existence of a mass grave, said such letters never crossed his desk: “Mass graves in such a small area like the enclave of Srebrenica would cover practically the entire urban area or the area of the enclave”:T.42904-42905.

- Of the 2004 RS Government Srebrenica Report(P6220), finding that several thousand Bosniaks were liquidated, said its validity “cannot be considered a historical fact”:T.42906. Added, in response to **KARADŽIĆ**, that it was created under international pressure:T.42906-42907.

Dušan DUNJIĆ

Claim contradicted by other reliable evidence

Claim

Destruction of artefacts means Prosecution experts’ conclusions cannot be tested:T.41736-41744.

Contradiction

Agreed it is acceptable to dispose of artefacts that pose health hazard, provided documentary and photographic records exist:T.41857. Acknowledged Prosecution records were “ample” and “extensive”:T.41735. Conceded he completed most of his reports without asking to inspect any artefacts:T.41853-41854.

Not all bodies in graves are Srebrenica-related: some graves were “enriched” with bodies buried at different times:T.41745-41747;T.41751;T.41758;T.41771-41772;T.41793-41794.

Different degrees of putrefaction in a single grave indicates different times of death or burial:T.41747;T.41761-

Confronted with testimony of R.WRIGHT(T.22313), F.PECERELLI(T.22741) and W.HAGLUND(T.23913-23914), on enrichment, who all testified they saw no evidence of enrichment in the graves they exhumed, and that of R.WRIGHT(T.22307) and C.LAWRENCE(T.22482) on putrefaction, who testified that bodies

<p>41763;T.41793-41794. Winter clothing indicates that the victims died at different times:T.41847-41848.</p>	<p>decomposed at different rates in different parts of a grave, he conceded that this, rather than enrichment, could explain differing rates of decomposition: T.41871-41878. T.41879-41882. Conceded that winter clothing did not necessarily mean the victims died in winter:T.41848.</p>
<p>Only bodies with ligatures/blindfolds are execution victims. No evidence to indicate that other bodies with gunshot or blast injuries were executed:T.41749-41750,T.41781.</p>	<p>Conceded that Branjevo autopsy reports showed injuries consistent with evidence of F.KOS and D.ERDEMOVIĆ (P332,pp.50-51):T.41894-41902. Conceded he did not look at cases with ligatures/blindfolds to determine whether any similarities with injuries on bodies without blindfolds/ligatures, which he agreed would have been useful:T.41898-41899. Conceded evidence of F.KOS describing use of grenades would assist in determining why Kravica victims had blast injuries:T.41902-41903. Conceded Defence only provided him with statements describing combat, not executions:T.41902.</p>
<p>Secondary graves are only secondary for bodies with a DNA connection to a primary grave; they are primary gravesites for all other bodies:T.41751,41882-41883.</p>	<p>Confronted with evidence of links between primary and secondary graves other than DNA (ballistics, soil and other material), and statements of engineers who moved primary graves to secondary locations(T.41883-41886), conceded he did not take any of those factors into account:T.41886.</p>
<p>Blindfolds may be headbands or bandages:T.41755.</p>	<p>Conceded he was not provided with such evidence that prisoners were blindfolded(KDZ064:P769,pp.110-111;KDZ039:P3940,p.37):T.41835-41836. Conceded he never mentioned this theory prior to hearing KARADŽIĆ put it to a witness in court because his evidence on this point was based on KARADŽIĆ's statement:T.41827-41834.</p>
<p>Cause of death cannot be determined on skeletonised remains: T.41775-41778;T.41781-41782. Prosecution experts' assumptions in assessing cause of death (that injuries occurred in life; and that an injury <i>was</i> the cause of death if capable of causing death), are not scientifically acceptable:T.71776-41782.</p>	<p>Conceded the assumptions were explained clearly and that it was up to the Court to determine their reasonableness:T.41859-41861. Shown one clear example of a body with a bullet still inside(D3896,p.193), continued to claim, unreasonably, that there were no grounds to conclude that the individual suffered a gunshot injury:T.41862-41866.</p>
<p>San Antonio Report(P4338) shows deficiencies in the work of Prosecution experts. Too much subjectivity and too little objectivity:T.41789. Prosecutor McCLOSKEY improperly edited autopsy reports:T.41786-41789.</p>	<p>Only parts of the Report(P4338) critical of the Prosecution:T.41811-41813. Deliberately ignored the Report's main recommendation, falsely claiming he did so because he did not have it "at [his] disposal":T.41813-41817. Confronted with W.HAGLUND testimony(e.g. T.23940) regarding allegations about McCLOSKEY, nevertheless continued to speculate without basis that</p>

	McCLOSKEY edited autopsy reports:T.41819-41821.
Other credibility/reliability issue	
Impartiality/independence:	Claimed without basis that C.LAWRENCE’s conclusions were “malicious”:T.41821-41824. Argued that civilian clothing did not mean the victims were civilians, despite arguing the opposite in a prior case where the victims were of Serb ethnicity:T.41841-41846. Claimed without foundation that unnamed individuals killed in 1992 were in Srebrenica graves:T.41904-41908.
Sources and methodology:	commented on documents whose provenance and contents he could not confirm:T.41765-41767. Did not provide citations for all material factual statements in his report:e.g. T.41827,T.41841. Did not receive, or excluded, relevant documents or information from his report:e.g. T.41885(not given statements of secondary grave excavators);T.41902-41905(only provided with statements describing combat, not executions, at Kravica). Made material errors when quoting source material:T.41889-41895.
Expertise:	admitted he was not a military expert, nor an expert in DNA, anthropology or archaeology:T.41808-41811. Nevertheless, speculated on these topics at length in his testimony and his reports:e.g. T.41766-41768,T.41773(demographics);T.41799-41802(allegations against ICMP);T.41827-41834(blindfolds).

Milenko KARIŠIĆ

Claim contradicted by other reliable evidence	
Claim	Contradiction
Did not speak to KARADŽIĆ about Srebrenica during 11 July, 10:30 p.m. meeting because “I had no information”:T.40615. Said he was at the (Police Forces Command) Staff in Pale on 11 July, conducting completely different activities related to Sarajevo front:T.40615-40616.	Shown Mane DJURIĆ ’s diary entry for 11-Jul-1995, “ KARIŠIĆ – came by [Zvornik] and expressed an interest”(P6190,p.1), and DJURIĆ ’s testimony that this entry “most likely” referred to Milenko KARIŠIĆ (T.35037), couldn’t remember if he went to Zvornik on 11-Jul-1995:T.40612. Shown intercept, morning of 11-Jul-1995, “Bor asked Omega 21 [Danilo ZOLJIĆ ; Zvornik CSB Commander of PJP units:T.36221] to check how many men he can collect. Karlo [Milenko KARIŠIĆ :T.40596] will take them.”(P4581), said he simply could not remember this:T.40614-40615. Shown KUAC ’s report, 13-Jul-1995, to the RS Deputy Minister of the Interior, and Head, RS MUP Bijeljina RJB [KARIŠIĆ], personally regarding Srebrenica: “VRS and MUP managed to capture a large number of Muslim soldiers” and referring to “interviews with prisoners”(P4389,p.1), said that “these dispatches” were arriving at the seat of the department in Bijeljina; he could not read them because he was in Sarajevo:T.40624. Shown BOROVIČANIN ’s 13-Jul-1995 report to the Pale Police Staff “we captured, or had surrender to us, around 1,500 Muslim soldiers. The number increases by the hour”(P2987,p.2), said he was out on the ground by Trnovo,
As head of the RJB in July 1995, it was never reported to him that the VRS and/or MUP had taken “large numbers of prisoners”:T.40604.	

<p>Shown intercept between Main Staff duty officer and MLADIĆ, 16-Jul-1995, 16:15 hours, “[w]ell the President called a short while ago and said that he had been informed by Karisik that Pandurević has arranged passage for the Muslims”(D2002), said he did not report to KARADŽIĆ. “I could not [...] because I did not have the technical requirements for it.”:T.40657.</p>	<p>and so did not see this dispatch:T.40630. Shown KIJAC’s report, 15-Jul-1995, addressed to him personally, that “a group of about 100 captured Muslims from Srebrenica managed to escape from Gornja Pilica”(P4981), accepted that he did receive information that there were prisoners in Zvornik the day before he went there (16 July):T.40635-40636. Shown dispatch from Pale Forces Command Staff to the Deputy Minister, 16-Jul-1995, re information from KARIŠIK received at around 1500 hours about negotiations between the VRS Command, represented by PANDUREVIĆ, and ABiH forces on the passage of “Turkish troops through a part of the territory of Zvornik municipality”(P5222), agreed that he informed the Pale Staff about these events at around 1500 hours on 16 July:T.40652-40653.</p>
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Dane KATANIĆ

Other credibility/reliability issue

Confirmed that on 13 July he heard of a Serb soldier being killed at Kravica Warehouse and that Muslims were then shot and killed:T.38666-38669. Denied he knew on 13 July of the scale of the killings or who was responsible:T.38684-38685. Stated “[t]o this very day I don’t know how many people got killed during the unrest, and on the 13th, how was I supposed to know? Please enlighten me. If you say that I was supposed to know, then please enlighten me [...] Go ahead, be my guest.”:T.38669. Confronted with evidence that other witnesses had driven past the warehouse on 14 July and seen bodies outside, he denied seeing any bodies outside the warehouse when he drove past on 14 July:T38672-38674.

Dragan KIJAC

Claim contradicted by other reliable evidence

Claim

The DB were not following the reporting of international organisations:T.44343.
KIJAC was not following the news media in Serbia, including newspaper reports:T.44346,44348.

Contradiction

Shown his report to **KARADŽIĆ** dated 21-Jul-1995, attaching a report by ICRC “for the period between 10 and 16-Jul-1995 and describing media reporting in Belgrade and Priština (P6538,p.3), said that in Pale they “didn’t receive a single written media from Serbia during the war, nor was I able to follow their TV programmes”:T.44348.
Shown his telegram dated 31-Oct-1995, to the VRS GŠ Security Administration regarding David RHODE’s arrest and investigation of Srebrenica-related mass graves(P5227), said “if one ID and one military

	<p>service book are evidence of crimes, then I have no further comment”:T.44356.</p> <p>Asked about his 16-Jan-1996 order (from the Minister of the Interior to the Head of the RJB) to act on SALAPURA’s request to “issue personal i.d.s” for members of the 10th Sabotage Detachment who were “foreign citizens” or “on a list of individuals” indicted by the Hague Tribunal (P4491,p.1), said he didn’t know who the passports were made for(T.44365-44366) and didn’t know to this day whether these persons were accused by the Hague Tribunal:T.44365-44366.</p>
<p>RS MUP did not investigate the events in Srebrenica because the MUP cannot do that on its own, but only pursuant to a decision-order of a court that has jurisdiction:D4143,para.57.</p>	<p>Confirmed he received KARADŽIĆ’s order dated 1 -Apr-1996, to carry out “a detailed investigation” of locations “where victims of the armed conflict in and around Srebrenica are to be found”(P164), but the MUP did not conduct any investigation:T.44372. KIJAC’s report, dated 23-Sep-1996(P165) did not refer to any investigation; it was addressed to the Ministry of Justice which had started talks with representatives of the ICTY:T.44371.</p>

Franc KOS	
Claim contradicted by own statement	Contradiction
<p>Claim</p> <p>150 were killed inside Kravica Warehouse (based on his estimation of the size of the warehouse) and 20 in front:D3927,pp.16-17.</p> <p>The 10th DOd executed six busloads of men at Branjevo Farm on 16-Jul-1995:D3927,pp.33-34. On the seventh bus, soldiers arrived to take over. The eighth bus was half full of prisoners:D3927,p.34.Between 350-370 were killed altogether:D3927,p.45. It was impossible that 1,200 were shot:D3927,p.46.</p>	<p>Confirmed that in 2004 interview he said the number killed was approximately 1,300 Muslims:T.42410. Said that this number was based on everything known by then, what people were saying:T.42411-42412.</p> <p>Confronted with 2010 OTP interview where he said relief executioners arrived on the 11th bus(T.42367-42368), accepted he had changed his account:T.42370. Confronted with prior statement to BiH prosecutor that he counted seven buses arrive and then for another hour and a half buses kept coming faster and faster(T.42371-42373) said “the events happened a long time ago” and “in 2010 at first I couldn’t remember all the details”:T.42374. Conceded his memory would have been clearer when he gave earlier statements, and it was never in his interest to inflate his prior estimates:T.42380.</p>
Claim contradicted by other reliable evidence	Contradiction
<p>Claim</p>	

<p>Only two buses were used to transport the prisoners to Branjevo Farm. These rotated with one arriving at a time:D3927,p.42.</p>	<p>Confronted with the evidence of survivors that the buses arrived in groups of two and three(P4342,p.26;P354) and a statement by ERDEMOVIĆ in an article from Slobodna Bosna dated 22-Mar-1996 that five buses in total were used(P6451,p.2), conceded that he could not exclude that there were five buses in total:T.42374-42376.</p>
<p>Other credibility/reliability issue Convicted in BiH and given 40-year sentence for his role in the Branjevo Farm killings:D3927,p.54;T.42359-42360.</p>	

Svetozar KOSORIĆ

Other credibility/reliability issue

DK Assistant Chief of Staff for Intelligence but denied knowing anything about the murder operation at the time, or being involved. Did not know that men were separated in Potočari or that they were brought to Bratunac, where he spent the night:(T. 38698); Shown Maj. BOERING's testimony in POPOVIĆ, "Kosović or Kosorić [...] responsible for transporting the refugees"(P3969,pp.80-81;T.38699), denied having anything to do with the transport or the busesT.38700;T.38704. Claimed he learned from the media, the Tribunal, about the murder of about 1000 men separated outside of Potočari:T.38713-38714. To Prosecution observation that the DK intelligence chief learned about murder in the DK area of responsibility from the media, "remembered" that in September or October 1995 "other international bodies spoke about that to us"(T.38714) and "There was talk about it in pubs, but those were rumours, and I didn't believe them":T.38714. Said was "very much surprised, because there is no order that can tell anybody to do that. Nobody must follow such an order":T.38715.

Shown 16-Jul-1995 intercept(P5077), GOLJIĆ informed POPOVIĆ urgently needs 500 litres of D2/diesel fuel or his work will stop(T.38718) and asked if he knew that his subordinate GOLJIĆ was assisting POPOVIĆ on 16 July, replied that he did not have "the faintest idea", was 30km away and had no contact with GOLJIĆ:T.38718-38719. Shown Zvornik Bgd duty officer's logbook, 14 July(P4585,ET-2,p.38): "Colonel SALAPURA called – Drago and BEARA are to report to GOLJIĆ" said "didn't know anything about this. I was 70 or 80 km away":T.38719-38720. To Prosecution description "you're in some kind of bubble in Žepa where you have no idea what's going on in the Drina Corps AOR even though you're chief of intelligence", agreed "That is correct. I didn't know anything":T.38721. Shown 14-Oct-1995 video(P4490), KOSORIĆ and POPOVIĆ at 10th Sabotage Detachment celebration and asked if October 1995 he knew from international organisations and others that the 10th Sabotage Detachment had taken part in mass execution at Branjevo, did not remember when he exactly found out, "it was in the autumn, but I had nothing to do with the 10th Sabotage Detachment. It's a Main Staff unit. I don't know":T.38734-38736.

Tomislav KOVAČ

Claim contradicted by own statement

IT-95-5/18-T
Confidential

Claim	Contradiction
Type-signed 12-Jul-1995 order forwarding KARADŽIĆ 's order to establish the police station in Srebrenica(P2995) went out of his office, but not with his knowledge:T.42738-342739.	Confronted with his 2003 OTP interview("[o]n the 12 th , I remember there was an overload of dispatches [...] and on that day we also received the order from the President [...] on forming of the police station [...] it's come from my office with my knowledge"), said "I'm not giving you a different answer":T.42739-42730.
Claim contradicted by other reliable evidence	
Claim In July 1995, focused exclusively on Sarajevo:T.42726; D3960,paras.117,131. After he was re-subordinated to the army, BOROVČANIN was not duty-bound to report what he had been doing to the police:T.42759.	Contradiction Shown dispatch type-signed KOVAČ , Staff Commander, 6-Jul-1995 (P6421,p.2 "the offensive against Srebrenica began"), said "I'm not reporting about Srebrenica. I am conveying information":T.42728. Shown BOROVČANIN 's report, 13-Jul-1995, to Pale Police Staff, Vogošća Police Staff, SBP Janja, on activities of MUP forces on 12 and 13 July(P2987,p.2 "we captured, or had surrender to us, around 1,500 Muslim soldiers"), said "he may report. It's up to him [...] he doesn't have the obligation to":T.42760.
At his meeting in President's office at 15:50 hours on 13 July(P4367) they discussed the shortage of ammunition on the Sarajevo-Trnovo front:D3960,para.117. At meetings with KARADŽIĆ on 13, 14, 15 July 1995 the main topic was the situation in Sarajevo, perhaps briefly touched upon the forming of a police station in Srebrenica:D3960,para.130. KOVAČ did not bring up Srebrenica(T.42766) because MUP forces were re-subordinated to the army and because he had opposed the engagement of units in Srebrenica, because of the real danger in Sarajevo:T.42764-42765.	Shown VASIĆ 's report to the MUP, 13 July, "killing of about 8,000 Muslim soldiers", "job is being done solely by MUP units"(P4942), maintained KARADŽIĆ and he did not discuss Srebrenica because there were no problems in Srebrenica, only Sarajevo:T.42765. Shown prior testimony in <i>Jević</i> case that he went to the field on 13 July on orders of KARADŽIĆ "with the intention of finding out about the situation in the town and the state of industrial facilities"("it was my obligation as a policeman to visit the terrain"), said he stood by that testimony:T.42767. KOVAČ did not raise with KARADŽIĆ on either 14 or 15 July BEARA 's request to use a MUP unit for executions because he, KOVAČ , was not aware of the plan to liquidate prisoners; and when he ordered the security centre and all the command structures not to co-operate with BEARA he considered the problem solved. Also, he did not understand BEARA 's request as a request from the GŠ; saw BEARA as a petty manipulator, had no idea he was capable of such great evil:T.42801-42802. Asked by the bench about his 2010 interview where he said the reason why he did not discuss with KARADŽIĆ what was happening with the army killing people when they met on 13, 14, 15 July was because KARADŽIĆ received

	<p>all the information that he needed from DERONJIĆ and BAJAGIĆ(T.42821-42822), said he did not think that KARADŽIĆ did receive this specific information that BEARA had requested police to kill prisoners:T.42822-42823. In re-examination, said “I said clearly that people came who were in charge of informing him about Srebrenica, not that they informed him about crimes in Srebrenica”:T.42853.</p> <p>Confronted with his 2010 interview when he said of KARADŽIĆ “there is no way he could not have known about BEARA’s behaviour”(T.42831), denied that he had changed his story:T.42832. Said that what he had meant by that was: “[i]f the military security and the GŠ of the VRS had acted lawfully, he should have had that information”:T.42834.</p>
Other credibility/reliability issue	
<p>Asked if he stood by his statements that “[o]ne day, perhaps on 14th July” Mane ĐURIĆ told him that BEARA had requested a police unit and that VASIĆ and ĐURIĆ were worried that the unit might be used for illegal activities, including liquidations of prisoners”: (D3960, para.124), said he learned this later in a telephone conversation with ĐURIĆ; ĐURIĆ was not in Bratunac or Srebrenica but in Zvornik on 14 July:T.42789. VASIĆ did not report to KOVAČ that he had information that BEARA intended to execute POWs when he met him on 14 July:T.42790.</p>	

Slavko KRALJ	
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>Did not agree that restrictions on troop relief, troop rotation and troop supply “substantially degraded the operational effectiveness” of the Dutch UN troops in Srebrenica; Col. ĐURĐIĆ knew precise quantities needed for Dutch Bat to function:T.36569.</p>	<p>Contradiction</p> <p>Shown 26 February-4 March 1995 UNPROFOR report that on 3 March Dutch troops in Srebrenica ran out of food(P2478, p.5) said: “[t]hey gave Muslims food and then they didn’t have enough and then they clamour saying that they did not have enough food, that Srebrenica did not have enough food”:T.36570-36571.</p> <p>Asked was he saying Dutch Bat were starving themselves, replied they gave part of their food reserves to the Muslims “and then it happened that for some reason they didn’t get enough food for themselves at a given point in time”:T.36571.</p> <p>To evidence of shortage of fuel, no re-supply from end of-Apr-1995 (FRANKEN testimony(T.23067-23068); 11-Jul-1995 UNMO report about hopeless food situation; Dutch Bat unable to help wounded because not re-supplied(P841), said they had sufficient fuel for a certain period of time; didn’t</p>

	<p>know of a systematic denial of re-supply:T.36571-36572. Shown 3July VRS MS dispatch from his sector refusing Dutch Bat troop rotation(P4454) said was not aware of VRS GŠ practice of reducing UN troop numbers in the enclave:T.36576.</p>
<p>Other credibility/reliability issue</p>	
<p>Claimed UNHCR could feed the civilian population but for part of the aid being given to the Muslim army in the enclaves. Asked if he was blaming the Muslims that UNHCR could not meet feeding targets, answered: “to a considerable degree their fault”:T.36566-36567. Did not agree humanitarian aid restrictions had a debilitating effect on the population in Srebrenica; said “the Muslim army, they took whatever they took from the convoy and they, thereby, had a debilitating effect on the civilian population”:T.36569. Was not informed about the situation of Dutch Bat and 40,000 civilians in Srebrenica in July 1995(T.36574-36575); had “no clue how many civilians there were in Srebrenica” and that the number of DutchBat personnel dropped from over 300 to 147:T.36575.</p>	

<p>Radislav KRSTIĆ</p>	
<p>Claim contradicted by own statement</p>	
<p>Claim KRSTIĆ did not design/plan Krivaja 95(P4481):D4136,pp.401-413.</p>	<p>Contradiction Shown P4555,P5121, [REDACTED] (KARADŽIĆ interview 4-Aug-1995, saying KRSTIĆ planned the Srebrenica operation “in front of me”), said he was involved in assessments (D4136,p.413) and elaboration of all operative plans, but that KARADŽIĆ “had no basis for this type of allegation”:D4136,p.413. To judge’s question whether he participated in the planning of the operation, replied: “[y]es”:D4136,p.452.</p>
<p>Claim contradicted by other reliable evidence</p>	
<p>Claim KRSTIĆ took over the duty of DK Corps Commander on either 20 or 21 July, on the day of the take-over of duty between him and General ŽIVANOVIĆ:D4136,p.321.</p>	<p>Contradiction Asked if 13-Jul-1995 “search the terrain” order signed by KRSTIĆ as “Commander”(D2239) was signed in the capacity of “Corps Commander,” said: “[n]o. It has nothing to do with the duty of the Corps Commander. But as the Commander of the forces that were engaged on the execution of the task against Žepa”:D4136,p.299. Confirmed in cross-examination that he was in command of forces searching the terrain in the Srebrenica enclave from 14 to 17 July but “[t]hose were units that had been engaged for Žepa, and they had to carry out this task”:D4136,p.715.</p>
<p>KRSTIĆ denied any contact with BOROVIĆANIN [REDACTED]</p>	

<p>██████████ on 13 July ██████████ D4136,pp.694-695.</p>	<p>things were going(P4946), said: "I did not communicate with Ljubisa BOROČANIN at all":D4136,pp.694-695.</p>
<p>KRSTIĆ never ordered summary executions of Muslims between 11-Jul and 1-Nov-1995:D4136,p.732.</p>	<p>Shown 2-Aug-1995 KRSTIĆ-OBRENOVIĆ intercept, "[k]ill them all" (P6065) and asked if he told Major OBRENOVIĆ to kill all the people captured that day, KRSTIĆ said: "no [...]. This is 100 percent montage. On that day I didn't talk to OBRENOVIĆ at all [...]. This is [...] rigged":D4136,pp.833-838.</p>

<p>KW-558</p>	
<p>Claim contradicted by own statement</p>	<p>Contradiction</p>
<p>Claim</p> <p>Nenad DERONJIĆ was at some point ordered from Konjević Polje to Srebrenica. Did not recall seeing DERONJIĆ in Konjević Polje on 13 July:D3764,pp.22-23,39-40;T.40759-40763;T.40767-40770.</p>	<p>Acknowledged that he was unsure of the exact date policemen including DERONJIĆ left Konjević Polje for Srebrenica and that he was unable to say whether DERONJIĆ was in Srebrenica on 13 July:D3764,pp.23,39-40;T.40761-40762;T.40768.</p> <p>Confirmed that he spent most of his time at the command post from which he could see little of what was happening outside including at the checkpoint:T.40768-40770; ██████████;T.40774-40775(partially confidential).</p>
<p>Claim contradicted by other reliable evidence</p>	<p>Contradiction</p>
<p>██████████</p> <p>On 13 July he only came across two Muslim men at the command post of the 6th PJP, the third location where KDZ065 was held. These two Muslims were Rešid SINANOVIĆ and Hasan SALJHOVIĆ: ██████████</p> <p>██████████;T.40755-40759;T.40768-40769(partially confidential).</p>	<p>██████████</p>
<p>Other credibility/reliability issue</p> <p>Claimed to have only learned about Kravica warehouse massacre in 2000. Maintained this position despite acknowledging that he knew MUP Officer KRSTO and had learned of his death between 14 and 16 July 1995, and confirming that he drove past Kravica warehouse on the morning of 14 July:T.40776-40781.</p>	

KW-582
<p>Other credibility/reliability issue</p> <p>KW-582 was evasive when asked about the activities of the Military Police in providing security for MLADIĆ(D4291,pp.7-9), his own activities on 12 July(D4291,pp.13,18-19), the activities of the Military Police in Pilica on 15,16 July(D4291,pp.65-66). Asked whether the Brigade Commander has any responsibility for the care of prisoners in his custody, said: "I am not familiar with the structure of the chain of command in the army":D4291,p.76.</p> <p>KW-582 was inconsistent.</p>

KW-679
<p>Other credibility/reliability issue</p> <p>[REDACTED]</p>

Gordan MILINIĆ	
Claim contradicted by other reliable evidence	
<p>Claim</p> <p>It is improbable that KARADŽIĆ signed Directive 7, though he may have been tricked into signing it. If he did sign it, he did not read it. It contains sentences completely contrary to his convictions. It is not a valid document:D3682,paras.21-22;T.39754-39755;T.39758;P838.</p>	<p>Contradiction</p> <p>Shown 52nd Assembly Session statement: "I signed Directive number 7"(P1412,p.95¹;T.39761), MILINIĆ disagreed that KARADŽIĆ's words meant that he signed Directive 7:T.39761. "He did not say "sign" he said "signirati" which is one thing, and to sign is a different thing":T.39763.</p> <p>Shown 54th RS Assembly session, 15/16-Oct-1995: "I have examined, approved and signed seven directives"(P1415,p.84):T.39765. Asked if KARADŽIĆ is saying that he signed seven directives, replied: "That's what it</p>

¹ Note: Revised translation for P1412,p.75 reads: "the time had come, I put my mark on Directive No. 7".

	says; however, by the same token, it is clear that he was being set up by the army, that they did not even show him some things. They didn't show him what was to be signed"; perhaps KARADŽIĆ was "set up and the seventh was slipped in to be signed alongside other documents":T.39765.
Other credibility/reliability issue	
Denied that Muslim men were killed on a mass scale. Srebrenica was "set up by the Muslim media and by different world factors", perhaps a few hundred were executed but most were killed in combat:T.39769. "Srebrenica is a huge set up":T.39770. Asked by KARADŽIĆ if there was any knowledge of illegal killings on 6 Aug-1995(P1412), reiterated that "no one sent any kind of information of any killings". Testified: "To date I still do not believe it took place", it was all part of "massive Muslim propaganda," 1000 "Srebrenica Muslims" were registered to vote in Vienna, "the Srebrenica graveyard is one big farce", "I will never acknowledge it:"T.39792-39793.	

Nedo NIKOLIĆ	
Claim contradicted by own statement	
Claim	Contradiction
In July 1995, was manager of Ciglana/brick factory in Bratunac:D3690,para.13. On 14 July between 10:00 to 11:00 hours Branimir TEŠIĆ, Momir NIKOLIĆ, BEARA and other came to his office. BEARA asked whether Muslims from Srebrenica could be put up temporarily in the factory compound. While at the factory BEARA spoke on the phone for a short while. After the call finished he announced that they were leaving. Neither BEARA or any of the others said anything to Nedo NIKOLIĆ and he assumed the plan to use the factory had fallen through:D3690,paras.15-18.	Elaborated on cross that after BEARA had finished the phone conversation, Momir NIKOLIĆ told Nedo NIKOLIĆ that "this combination was off":T.39824. Confronted with his 2004 statement(P6400,p.2) in which he said, "Momir NIKOLIĆ arrived and said that this location had been given up and that Muslim prisoners would not be held there. This was a final, definitive order from above. I noticed that BEARA became angry when he heard this, but he obviously had to accept it"(T.39824), claimed that Momir NIKOLIĆ told him the plan had been scrapped, but this was not announced to the group and it was Nedo NIKOLIĆ's assumption that the order came from above, and that BEARA was upset:T.39827. Confronted with his Feb 2012 statement(P6401) in which he said that BEARA had said they were giving up on the brick factory, maintained his position that BEARA said nothing to him after the phone call ended:T.39828. Confirmed that by saying the order came from above he meant from "the military top":T.39836.
On 13 July he did not know about the buses parked in Bratunac or the men held in the Vuk Karadžić school, as he went directly from his flat to work that day:D3690,para.19.	Confirmed the location of his flat in Bratunac:T.39808-39809. Confronted with an annotated photo showing the positions of the buses, including outside the school and the stadium(P257), maintained he did not see or hear anything that night(T.39812-39814); marked his route to and from the flat:D3691;T.39834-

39835.
<p>Other credibility/reliability issue</p> <p>Heard how at Kravica warehouse a Muslim had grabbed a rifle from a Serb guard and that many Muslims had then been shot:D3690,para.20. Confirmed in cross-examination, “I was not an eye-witness and I cannot claim anything”:T.39818. Admitted in cross-examination that machines from the brick factory were used for the original burial and then reburial operation for the victims from Kravica warehouse:T.39816-39817;T.39819-39823.</p>

Milan NINKOVIĆ	
Contradiction	
<p>Claim contradicted by other reliable evidence</p> <p>Claim</p> <p>NINKOVIĆ, member of the CS(T.40473) and President of the SDS municipal board(T.40482) in Dobojo, did not hold “a single important position” in the municipality of Dobojo in April 1992:T.40473.</p>	<p>Shown statement by KARADŽIĆ about NINKOVIĆ: “I heard that in Dobojo, he has things under his control [...] if he can control a huge municipality while he is not even its president, he can influence the events, it gave me some hope that it is possible for him to introduce order in the army as well.”(P1398,p.48):T.40486. To the claim that he controlled the municipality NINKOVIĆ replied: “That is not correct [...] I said I was a member of the Crisis Staff, but I was not the person at its head”:T.40487.</p> <p>Shown his statement on a Serbian Radio Dobojo programme stating “I was in charge of Dobojo municipality”(P6419,p.2), said “Yes”, but later claimed that “these political speeches and statements cannot always be taken at face value”:T.40496-40497.</p> <p>Shown an article by NINKOVIĆ in <i>Novi Glas</i> dated 26-Mar-1993 stating “Back in December 1991, according to precise and strict instructions of the Main Board of the party, OOSDS Dobojo formed a Secretariat of the party, formed a Crisis Staff and issued a decision on initiation of preparations for formation of the Serbian Municipality of Dobojo”(P6418,p.2):T.40488-40490. To the claim that he followed the precise and strict instructions of the SDS Main Board, the December 1991 instructions, said “Yes”(T.40490), but when asked again he said “No, we did not”. Said that the secretariat was formed but that he did not know if the instructions envisioned the formation of secretariats:T.40492. To the assertion that the instructions call for a party secretariat, replied “That is correct”:T.40492.</p>
<p>Variant A/B instructions were not followed in Dobojo:T.40473;T.40488. The instructions said one thing, we did another:T.40488.</p>	

Other credibility/reliability issue

Claimed that he first learned of the MOD's involvement in the mobilisation of buses used to remove thousands of elderly men, women and children from the Srebrenica area when he came to testify before the ICTY:T.40506-40508.

Mile PETROVIĆ**Claim contradicted by other reliable evidence****Claim**

The foreigners got onto the APC and we set off towards Bratunac. At about two km from Konjević Polje the foreigners asked us to return to Konjević Polje:D4218;T.45556.

Contradiction

To DutchBat member MULDER's statement that they "had to get into the APC", were "told to open the hatch", sit on top, "shoot any Muslim", given a Kalasnikov each, were driven 45 minutes in an area with Muslims, but didn't see any, said "half of it is not true":T.45558. They opened the hatch, asked for rifles, or perhaps I gave them my rifle. Maybe what they describe happened later after I left:T.45557-45559.

To DutchBat member DeBRUJNE's statement that the "gunner instructed" him to aim his firearm saying there were many Muslims walking around; later "the BSA fighters said we had taken part in a Serbian patrol and they laughed", witness replied "maybe that was after they left the APC", and he did not remember:T.45561-45662.

Other credibility/reliability issue

Told that witnesses testified were deceived into thinking it was safe to surrender when they saw a UN vehicle, said the thought never occurred to him at the time. "We just went there [to Konjević Polje] and we returned":T.45555.

Confirmed making the 17 July Bratunac Brigade Military Police Log entry that "[o]ne police patrol remained in Pilica to guard the Muslims"(PI69,p.16) but did not hear then that Muslims held in schools were executed on 16 July. "We transported those people to some school under escort, they got off a bus, they got into the school", did not know what happened afterwards. "Who would tell me?":T.45564.

Vujadin POPOVIĆ**Claim contradicted by other reliable evidence****Claim**

On 12-Jul-1995 in Potočari Muslim men were not separated while POPOVIĆ was there:D3993,para.24.

Contradiction

Shown report to VRS GŠ and DK Command, 12-Jul-1995 (P4388,para.3)

("[w]e are separating men from 17-60 years of age [...] We have about 70 of them so far"), said it was not his report; he did not know it existed until after his trial:T.43029.

Confronted with his own statement that confirmed reading P4388: "I read this

<p>On 13 July evening only men separated from Potočari were in Bratunac:T.43055;D3993,para.39.</p>	<p>telegram [...] the next day”(D3993,para.27), said he “got carried away” because irritated by the prosecutor:T.43032.</p> <p>Asked if he knew that in addition to men separated from Potočari, thousands captured along the Bratunac-Konjević Polje road were kept in Bratunac, where he spent the night on 13 July, admitted that he did know, but said he “did not see them”:T.43055-43057.</p> <p>Referred to the <i>Popović</i> Judgment (paras.400-404) and P769,p.69, about the situation in Bratunac(T.43057-43058) and asked if prisoners being beaten and killed all around him did not suggest to him that something was wrong, said he “did not know then that it was happening”:T.43058-43059.</p>
<p>On 14 July in the Orahovac school sports hall there were about 400-500 prisoners; some were sitting, some were standing or moving about:D3993,para.50.</p>	<p>Read KDZ039:P3940,pp.34-35, and KDZ064:P769,pp.98,102, said “[m]aybe there are truthful things in that”, but the hall was not so overcrowded and “[w]e gave them water”. “And everybody who gets out exaggerates their story a little”:T.43064-43066.</p>
<p>POPOVIĆ was not in Bišina at the time of the executions: [REDACTED]; D3993,paras.86-88.</p>	<p>[REDACTED]</p> <p>Rejected other evidence of involvement in the execution (P663 (vehicle log), P6499 and [REDACTED] (intercepts)) (T.43114-43122), but admitted being present when the “first several bodies” were loaded onto an excavator for burial:T.43128.</p>
<p>Other credibility/reliability issue</p>	
<p>Tried to find out what happened at Kravica warehouse, where he saw bodies:T.43045;D3993,para.36. Asked why, as chief of security, he accepted policemen at Kravica not telling him what happened, said: “I tried to find out what happened. The man didn’t want to tell me. And that was it”:T.43045.</p> <p>Asked by Judge Kwon if he was involved in the reburial operation, said: “[n]ot personally”, but he “controlled the use of fuel”:T.43114.</p>	<p>Asked why, as chief of security, he accepted policemen at Kravica not telling him what happened. The man didn’t want to tell me. And that was it”:T.43045.</p> <p>Asked by Judge Kwon if he was involved in the reburial operation, said: “[n]ot personally”, but he “controlled the use of fuel”:T.43113. “I just kept tabs on the use of fuel”:T.43114.</p>

Petar SALAPURA

<p>Claim contradicted by own statement</p>	
<p>Claim</p>	<p>Contradiction</p>
<p>Learned from PELEMIŠ in August 1995 about the 10th DOd participation in attack on Srebrenica:D3720,pp.21-22.</p>	<p>Referred to his evidence in <i>Tolimir</i> and at the BiH Court(T.40258), confirmed that a 10th DOd member on 11-Jul-1995 told him of 10th DOd involvement in the fall of Srebrenica:T.40259.</p>

		To the observation that the August PELEMIS talk was not when he first learned of the 10 th DOD's involvement, answered: "No", and "I found out immediately in Modriča":T.40258-40259.
Claim contradicted by other reliable evidence		
Claim		
During the war met with KARADŽIĆ only three times; did not remember ever speaking to him over the phone:D3720.p.26.		Contradiction To evidence of a number of meetings and telephone contacts (P2242.p.9;P4368.p.12;P1484.p.53) said he meant "direct contact", "it's a different thing when we met up [...] all together":T.40228-40233.
Learned about the killings in December 1995; did not discuss that with PELEMIS in August 1995:D3720.p.22;T.40261-40262.		Claimed he had no access to media in August because eastern and western RS had no electricity:T.40263-40264. Shown ZAMETICA's 17-July-1995 statement on RS TV and press denial of allegations about executions(P6409; P6410), replied: "Yes, I see that":T.40265-40267. Asked if Pale was better informed than he, said "It's possible" and most people from the Main Staff considered the executions "almost impossible even when they did hear about it", himself included:T.40267-40268.
Did not contact the 10 th DOD after 13-Jul-1995:T.40272.		Shown his 15 July order for painting two 10 th DOD terrain vehicles (P6411), said he signed it since he was at the command post:T.40273-40274.
Other credibility/reliability issue		
Confirmed role in drafting Directives 4, 5, 6(T.40239-40240) but denied his role in Directive 7 and its connection to 10th DO 23-24-Jun-1995 action in Srebrenica which he ordered(P6408):T.40250;T.40252-40254. Stated his 1996 order to issue 10 th DO members false IDs (P4491) was not a cover-up, the goal was for these people to stay and be brought before justice; to provide them safe shelter to avoid being executed:T.40285-40289.		

Milomir SAVČIĆ

Claim contradicted by other reliable evidence		
Claim		
On 13-Jul-1995 MALINIĆ informed that UNPROFOR members asked for help as it was unsafe to return to Potočari because of combat activities around Srebrenica:D3918,para.50;T.42263-42265.		Contradiction Shown EGBERS testimony in <i>Popović</i> trial(P331,p.35) that EGBERS was stopped at Nova Kasaba and met MALINIĆ(T.42264-42265), and asked if he knew that DutchBat did not ask for help, were halted there, their equipment stolen and were not free to leave, said they were stopped by other VRS units:T.42266-42267. Asked if his own statement was misleading, replied to judge's intervention, "I

	agree I omitted to state that fact” but did not wish to mislead anyone, the 65 th ZMTP can be “very proud” of its treatment of UNPROFOR members:T.42269-42270.
Other credibility/reliability issue	
<p>Learned “[a]fter a great many years” that more than 1000 men, who on 13 July were under his subordinate’s (MALINIĆ’s) control, were murdered:T.42253-42254. Upon judge’s intervention he stated: “Now I know that and now I accept that”:T.42253-42254. Later said they were under 65th ZMTP battalion control for “a very short time”; were told at Nova Kasaba by MLADIĆ they were going to be exchanged. “So how could I have known what later would happen to them”:T.42255.</p> <p>Asked if, as defence investigator, he knew that the men separated in Potočari and taken to Bratunac were murdered, responded he knew there were executions of POWs but he would “need to see some evidence” that people who were in Nova Kasaba were executed:T.42310.</p> <p>Shown TOLIMIR order dated 14-Jul-1995: destroy unmanned aircraft reconnoitring and jamming radio communications(P5101;T.42298), and his statement(D3918,para.70), claimed Art.13 of Geneva Convention III prevents aerial photography:T.42303-42304. To prosecution contention that the prohibition of (aerial) photography, and SAVČIĆ’s contested order to MALINIĆ (13 July: prohibit filming and photographing prisoners; remove prisoners from Milići-Zvornik road, place them somewhere indoors protected from sighting from ground or air(P168)), were to hide prisoners that were subsequently killed, said if his order was conveyed to MALINIĆ, moving prisoners from open spaces was to secure them with as little force as possible:T42305-42307.</p>	

Nada STOJANOVIĆ	
Claim contradicted by own statement	
Claim	Contradiction
<p>Not present at the Grbavci (Orahovac) School on 14-Jul-95 when prisoners were held there, instead at a field hospital and her sister-in-law/cousin’s house:D2266,pp.10-11,15-16. Not involved in providing blindfolds, and did not give water to prisoners as they were led out of the school to be executed:D2266,pp.17-19, 54-55.</p> <p>Did not hear the sound of gunfire from the Orahovac executions or alternatively did not register it as she had become oblivious to the sound of gunfire:D2266,pp.21-23,46-47.</p>	<p>When told witnesses placed her at the school and said she was handing out blindfolds and water, said “I really can’t remember.” Upon being challenged, said “I didn’t have any contact for sure”:D2266,p.18. Claimed she knew about the prisoners being held at the school, but this knowledge was from the radio. Claimed those witnesses who placed her at the school must be trying to shift blame from themselves:D2266,pp.20,56.</p> <p>At the time of the executions in Orahovac she was about 150-200m away:D2266,p.21. Confirmed that in general when she was 200-300m from a front line tending wounded she could hear gunfire during battles:D2266,pp.22-23.</p> <p>To the proposition that the execution gunfire would have been distinctive, as there would have been volleys of fire from only one side, she first claimed she</p>

	could not differentiate between different types of shooting, then agreed shooting from an execution would sound different. Witness suggested that drunken people in the village often shot in the air, then denied she heard any shooting:D2266,pp.23-24,46-47.
Other credibility/reliability issue	
No one from her MP unit spoke about the executions in the mini-van when returning to Zvornik. First heard about the Orahovac executions a month later as rumours were circulating in the town:D2266,pp.32-33. Claimed it took her so long to hear about the massacres because “people here think that women shouldn’t be told anything, or they shouldn’t know about [...] things”:D2266,pp.21.	

Srdja TRIFKOVIĆ

Claim contradicted by own statement	
Claim	Contradiction
During a meeting with TRIFKOVIĆ, PREMOVIĆ and RISTIĆ on 13 July, KARADŽIĆ spoke by telephone with an officer from the VRS Main Staff and was updated on the situation in Srebrenica. This officer was not Ratko MLADIĆ:D2905,paras.29-32.	Accepted that he testified in <i>Popović</i> that he was unable to recall any details about this meeting as he did not take notes, and his laptop failed. Accepted that he failed to mention the call when specifically asked whether KARADŽIĆ was in contact with anyone else during the meeting including soldiers:T.33353-33358.
Claim contradicted by other reliable evidence	
Claim	Contradiction
KARADŽIĆ ’s view was that “the Serb side did not want to defeat the Muslims militarily, but that each constituent nation should become master of its own fate”:D2905,para.20;T.33327.	Shown DK Command 24-Nov-1992 order(P2085,para.1) and Directive 7(P838,p.10), TRIFKOVIĆ conceded the language in these documents was inconsistent with the position conveyed to him by the BSL at the time:T.33328-33333.

Other credibility/reliability issue	
Testified that with the consent of the RS authorities he sought to represent Bosnian Serb views to the international media while not presenting himself as an official spokesperson, providing the ability to disassociate themselves from these statements:T.33319-33326;P6102(excerpt of testimony in the <i>Popović</i> trial). Accepted that in his writings he had been outspoken about Islam(T.33335; see generally:T.33335-33351,T.33361-33363), that he had described Islam as a psychosis(T.33348; P6100,p.3), confirmed he had previously been described as a genocide denier:T.33342.	

Mirko TRIVIĆ

Claim contradicted by other reliable evidence	
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Claim	Contradiction
The Supreme Command did not think that the Srebrenica enclave should disappear:D3747,p.15,para.2.6.2.	Shown Directive 7 statement: “create an unbearable situation of total insecurity with no hope of further survival or life”(P838,p.10), TRIVIĆ stood by his testimony in the <i>Mladić</i> case that the cited part meant the imposition of sanctions with a view to regime change: “the population should have a growing awareness of them being, in a way, prisoners of their own leaders and that therefore these leaders should be changed”:T.40537-40538.
Neither he nor other subordinate corps commands received an order with such the Directive 7 task to “create an unbearable situation”(P838,p.10):T.40539-40540.	Shown DK Command 20-Mar-1995 Order (P3040,p.6), “By planned and well-thought-out combat operations create an unbearable situation of total insecurity with no hope of further survival or life for the inhabitants of Srebrenica and Žepa”, TRIVIĆ confirmed receiving the order, but said he did not remember those words; did not “pay attention to this specific task”: T.40542-40544. Shown <i>Krivaja-95</i> Attack Order(P4481,p.3), TRIVIĆ denied the order was issued pursuant to Directives 7 and 7/1, but conceded that it states in the Order that it was issued pursuant to Directive 7 and 7/1:T.40545-40547.
Other credibility/reliability issue	
TRIVIĆ confirmed his testimony that the group at Nova Kasaba included civilians, but, because they had set out with the soldiers of the 28 th Division to flee, they had brought themselves into the position where they became “disarmed enemy soldiers”:T.40559-40560. Asked why he didn’t call them “detainees”, TRIVIĆ replied: “When the enemy side ... in an offensive is defeated and does not accept that defeat correctly but tries to break through to part of its own free territory, and then it gets to the stage where it is disarmed by the strength of the force that defeated it, that group of people brings itself in the situation of being a disarmed enemy force ... they have not become prisoners of war”:T.40562-T40563. Asked by the bench if he is saying that it is okay to kill all those at the football pitch because they were not prisoners of war, TRIVIĆ replied: “No, I never said that, and in any case I do not approve of something like that”:T.40563.	

Milenko ŽIVANOVIĆ

Claim contradicted by other reliable evidence	Contradiction
Claim The goal of Directive 4(P976) and ŽIVANOVIĆ’s order “deriving from” Directive 4(P2085) was not to expel Muslim civilians:D3932,para.15.	Agreed that forcing the Muslim population out was the task assigned to him by Directive 4:“But that Muslim population was staying at Serb villages and had taken Serb property too”:T.42596.
It was the DK’s right and duty to ensure restitution of houses and land belonging to Serbian civilians, and Muslim civilians	Shown reports and intercepted evidence(P3162:“village of Gobelji has been burnt”;P3161:“destroyed the village of Gobelji”;P5261:intercept between

<p>occupying that land “would have to be made to leave”:D3932,para.15.</p>	<p>ŽIVANOVIĆ and GABOROVIC: “Are the Turks’ houses burning?”;P4253:“propose that houses should not be torched...but that they be inhabited by people from Tuzla and other areas”), denied that DK was burning Muslim houses/villages and that he personally incited his units to do that:T.42604-42607.</p> <p>Shown OGNJENOVIC Information Report, 4-Jul-1994 stating “enemy’s life has to be made unbearable”(P4075,pp.2-3), confirmed that OGNJENOVIC was repeating MLADIC’s order given at a 1-Jul-1994 briefing:T.42618-42619.</p> <p>Shown his own 1-Jul-1994 notebook entry: “MLADIC:...the enclave is not to survive, but to disappear”(P6482,pp.5-6), said it was much better for the civilian population to go to areas outside of the combat zone than to be within such a zone “where there were no conditions for life because Srebrenica was too crowded with refugees who had gone there after our offensive in the spring 1993”:T.42625. Elaborated:“The idea is not that the population should be removed in the way that it should be killed...but that they would be saved”:T.42626.</p>
<p>ŽIVANOVIĆ personally arranged water supplies to Srebrenica; made sure that the civilians and the army got water:D3932,para.26;T.42626;T.42632.</p>	<p>Shown evidence of his 31-May-1993 verbal order to demolish the water supply system for Srebrenica “to be presented to the public as if the Muslim forces did it”(P5147) and his very urgent order, 21-Jun-1993, to submit the data on the “Muslim DTG that demolished the water supply system”(P5148), ŽIVANOVIĆ denied that in 1993 he ordered the destruction of the water supply for Srebrenica, and that he planned to blame the action on Muslim forces:T.42632-42635. Also shown 21-Jun-1993 DK report re attack by “Turks” on 26-May-1993 including destruction of the water tower(P5149):T.42634-42638.</p>
<p>DK never made life difficult for the inhabitants of Srebrenica; the controversial part of Directive 7 about the DK’s tasks was never implemented:D3932,para.26.</p>	<p>Shown DK Command Order, 20-Mar-1995(P3040,p.5), confirmed that in this order he was repeating, verbatim, the tasks assigned to the DK by Directive 7:T.42649.</p>

CONFIDENTIAL
APPENDIX G

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
Bijeljina A.1.1					
ŠABANOVIĆ	Admir	Redžep	29/02/1968	Male	P6185,p.1; D3142,p.52 (FN Amir)
ŠABANOVIĆ	Redžep	Adil	23/04/1942	Male	P6185,p.1; M.KIĆANOVIĆ:T.34891:13-14; D3142,p.52
ŠABANOVIĆ	Tita	Husein	02/08/1944	Female	P6185,p.1; D3142,p.52 (FN Tifa)
ŠINDRIĆ	Bego	Ahmet	01/02/1943	Male	P6185,p.1; M.KIĆANOVIĆ:T.34891:17-23; D3142,p.52
ARIFOVIĆ	Sabit	Osmo	10/06/1935	Male	P6185,p.1; D3142,p.52
BEGANOVIĆ	Ešef	Šerif	23/03/1969	Male	P6185,p.1; D3142,p.52
BELKIĆ	Almir	Mevludin	01/01/1976	Male	P6185,p.1; D3142,p.52 (FN Amir)
BELKIĆ	Ibrahim	Mevludin	21/08/1966	Male	P6185,p.1; D3142,p.52
BENLIĆ	Huso			Male	P6185,p.1; D3142,p.52 (LN BELKIĆ)
BIŠANOVIĆ	Bisera	Omer	07/08/1924	Female	P6185,p.1; D3142,p.50
BIŠANOVIĆ	Mirsada	Hamdija	27/10/1961	Female	P6185,p.1; D3142,p.50
BIŠANOVIĆ	Nermína	Hamdija	07/05/1953	Female	P6185,p.1; D3142,p.50
DANOVIĆ	Damir	Jusuf	12/01/1975	Male	P6185,p.1; D3142,p.52
DIZDAREVIĆ	Husein	Rifet	07/07/1941	Male	P6185,p.1; D3142,p.52
DOKIĆ	Mičo				P6185,p.1
ELMAZI	Mersim		01/01/1969	Male	P6185,p.1; D3142,p.52
GELJO	Husein	Osman	18/03/1933	Male	P6185,p.1; D3142,p.52
ILIĆ	Mirjana	Anto	27/07/1952	Female	P6185,p.1; REDACTED; D3142,pp.31,48-49
IMŠIROVIĆ	Hasan	Ahmet	17/06/1930	Male	P6185,p.1; D3142,p.52 (FN Haso)
IZIĆ	Majda	Mehmed	06/08/1927	Female	P6185,p.1; D3142,p.52 (LN ILIZ)
JAŠAREVIĆ	Dževad	Zuhdija	06/10/1956	Male	P6185,p.1; D3142,p.52
KARASULJIĆ	Feriz	Suljo	03/06/1959	Male	P6185,p.1; D3142,p.52
KOMŠIĆ	Adnan	Mustafa	14/02/1963	Male	P6185,p.1; D3142,p.52.; A.MAŠOVIĆ:P4853,p.1
KOMŠIĆ	Mustafa	Avdo	25/04/1933	Male	P6185,p.1; D3142,p.52.; A.MAŠOVIĆ:P4853,p.1
KOMŠIĆ	Rijad	Mustafa	18/06/1973	Male	P6185,p.1; A.MAŠOVIĆ:P4853,p.1
KRAJNOVIĆ	Sead			Male	P6185,p.1
LAZAREVIĆ	Zvonko	Blago	15/03/1972	Male	P6185,p.1; M.KIĆANOVIĆ:T.34891; D3142,pp.31, 50
LUKIĆ	Mile			Male	P6185,p.1
MUJKIĆ	Alija	Velaga	19/12/1927	Male	P6185,p.1; D3142,p.52 (LN MUJIĆ)
MULABDIĆ	Muhamed	Fikret	25/09/1964	Male	P6185,p.1; D3142,p.52 (LN MULAABDIĆ); A.MAŠOVIĆ:P4853,p.1
NARGALIĆ	Salko	Omer	28/12/1959	Male	P6185,p.1; D3142,p.26
NOVAKOVIĆ	Radmila				P6185,p.1; D3142,p. 50
OSMANOVIĆ	Dževad			Male	P6185,p.1; D3142,p.52
OSTOJIĆ	Antonija	Stevan	12/01/1926	Female	P6185,p.1; D3142,pp.31,49-50
PAJAZITI	Abdurahman	Čelebi	01/02/1954	Male	P6185,p.1; D3142,p.52
PAJAZITI	Bejtulah	Čelebi	10/03/1956	Male	P6185,p.1; D3142,p.52

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
SINANOVIĆ	Maid	Rahman	01/05/1965	Male	P6185,p.1; D3142,p.52
VRHOVAC	Ivica			Male	P6185,p.1; D3142,pp.30 (LN VRHOVEC),50 (FN Ivo, LN VRHOVEC)
ZIBERI	Ajruš	Sefer	01/01/1968		P6185,p.1; A.MAŠOVIĆ:P4853,p.2 (FN Ajrush)
Bratunac A.3.1					
HODŽIĆ	Hasan	Ibrik	01/01/1936	Male	A.MAŠOVIĆ:P4853,p.3 (FaN Ibiš)
HODŽIĆ	Selma	Hajrudin	01/01/1986	Female	AF2317 (Six year old girl)
HODŽIĆ	Suljo	Lutvo	06/08/1928	Male	A.MAŠOVIĆ:P4853,p.3
NUKIĆ	Abid	Ibrahim (aka Hašim)	01/01/1961	Male	A.MAŠOVIĆ:P4853,p.5
NUKIĆ	Ibrahim	Hašim	01/01/1935	Male	A.MAŠOVIĆ:P4853,p.5
NUKIĆ	Salih	Ibrahim	01/01/1956	Male	A.MAŠOVIĆ:P4853,p.5
RAMIĆ	Šaćir	Mušan	01/01/1952	Male	M.TALOVIC:P3188,para.16 ; M.TALOVIC:T.17659
RAMIĆ	FNU	Šaćir		Male	M.TALOVIC:P3188,para.16; M.TALOVIC:T.17659
SALKIĆ	Džemal	Meho	01/01/1941	Male	A.MAŠOVIĆ:P4853,p.5
SULEJMANOVIĆ	Musa	Alija	01/01/1928	Male	M.TALOVIC:P3188,para.16
Bratunac A.3.2					
ALJHROMIĆ	Hajdar			Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641
DELIĆ	Đafo			Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641
DELIĆ	Hamed			Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641
DELIĆ	Meho	Mehmed	01/01/1953	Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641; A.MAŠOVIĆ:P4853,p.3
DELIĆ	Redo			Male	M.TALOVIC:P3188,paras.35,36; M.TALOVIC:T.17640
DELIĆ	Meho			Male	M.TALOVIC:P3188,paras.35,36; M.TALOVIC:T.17640
DELIĆ	Bego			Male	M.TALOVIC:P3188,paras.35,36; M.TALOVIC:T.17640 ; A.MAŠOVIĆ:P4853,p.3
GEROVIĆ	Šaban			Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641
GEROVIĆ	Ramiz	Emin	01/01/1955	Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641; A.MAŠOVIĆ:P4853,p.6
GEROVIĆ	Ramo			Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641
GOLIĆ	Avdo			Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641
GOLIĆ	Ramo	Latif	01/01/1955	Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641; A.MAŠOVIĆ:P4853,p.6
GUŠIĆ	FNU			Male	M.TALOVIC:P3188,paras.35,36; M.TALOVIC:T.17640
HASIBOVIĆ	FNU			Male	M.TALOVIC:P3188,paras.35,36; M.TALOVIC:T.17640
IBIŠEVIĆ	Ilijaz	Lutvo	01/01/1974	Male	M.TALOVIC:P3188,paras.35,36; M.TALOVIC:T.17640 ; A.MAŠOVIĆ:P4853,p.3
IBIŠEVIĆ	Jusuf	Ramo	01/01/1955	Male	M.TALOVIC:P3188,para.38; M.TALOVIC:T.17641; A.MAŠOVIĆ:P4853,p.6

Municipalities Victim List

<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
IBIŠEVIĆ	Kemal	Hamid	01/01/1967	Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640 ; A.MAŠOVIC:P4853,p.3
IBIŠEVIĆ	Mehmed	Ibrahim	01/01/1941	Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641; A.MAŠOVIC:P4853,p.3
IBIŠEVIĆ	Osman	Meho	01/01/1961	Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641; A.MAŠOVIC:P4853,p.3
IBIŠEVIĆ	Ramo	Mujo	01/01/1970	Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640 ; A.MAŠOVIC:P4853,p.3
IBIŠEVIĆ	Sabrija	Mujo	01/01/1963	Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640
IBIŠEVIĆ	Mustafa			Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640
IBIŠEVIĆ	Mujo			Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640
IBIŠEVIĆ	Muharem			Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640
IBIŠEVIĆ	Refik	Abid	01/01/1975	Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641; A.MAŠOVIC:P4853,p.3
IBIŠEVIĆ	Sejid			Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17639-17640
IBIŠEVIĆ	Dževad	Hamid	01/01/1964	Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640; A.MAŠOVIC:P4853,p.3
JUNUZOVIĆ	Adem	Nazif	01/01/1935	Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641; A.MAŠOVIC:P4853,p.4
JUNUZOVIĆ	Banovka			Female	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641
JUNUZOVIĆ	Huso	Nazif	01/01/2027	Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640 ; A.MAŠOVIC:P4853,p.4
JUNUZOVIĆ	Abid	Huso	01/01/1951	Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640 ; A.MAŠOVIC:P4853,p.4
JUNUZOVIĆ	FNU	Abid		Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640
MILAČEVIĆ	Halid	Alija	01/01/1966	Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641; A.MAŠOVIC:P4853,p.4
MUŠIĆ	Šaban			Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641
OMERIVIĆ	Mirzet			Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640
OMERIVIĆ	Nezir			Male	M.TALOVIC:P3188, para.38 (LN OMEROVIC); M.TALOVIC:T.17641
OMEROVIĆ	Nermin			Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641
OMEROVIĆ	Selmo	Hakija	01/01/1946	Male	M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17640-17642; A.MAŠOVIC:P4853,p.6
OMEROVIĆ	Selmo	Adem		Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17640-17642
RIZVANOVIĆ	Čamil			Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641
RIZVANOVIĆ	Jasmin			Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641
RIZVANOVIĆ	Mustafa			Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
TALOVIC	Almaz				M.TALOVIC:P3188, paras.35,36; M.TALOVIC:T.17639-17640
TALOVIC	UZEIR	Huso	01/01/1933	Male	M.TALOVIC:P3188, para.38; M.TALOVIC:T.17641; A.MAŠOVIĆ:P4853,p.6
Foča A.5.2					
TUZLAK	ĆAMIL	HUSEIN	25/10/1904	Male	A.MAŠOVIĆ:P4853,p.6
Foča A.5.4					
ČOLO	ADEM	IZET	03/11/1967	Male	A.MAŠOVIĆ:P4853,p.6
ČOLO	IZET	ADEM	17/12/1947	Male	A.MAŠOVIĆ:P4853,p.6
ČOLO	SIFET	IZET	29/05/1969	Male	A.MAŠOVIĆ:P4853,p.6
BARLOV	HUSEIN	AVDIJA	21/06/1943	Male	A.MAŠOVIĆ:P4853,p.6 (DOB 1940)
BARLOV	MEHO	MEHO	15/07/1933	Male	A.MAŠOVIĆ:P4853,p.6
BARLOV	ZAIM	ZAHIR	01/01/1962	Male	A.MAŠOVIĆ:P4853,p.6(FN Azem)
ODOBAŠIĆ	FADILA	Velija	01/01/1961	Female	A.MAŠOVIĆ:P4853,p.6
PEKAZ	ARMIN	SMAJO	20/01/1972	Male	A.MAŠOVIĆ:P4853,p.6
PEKAZ	MUJO	UZEIR	19/06/1958	Male	A.MAŠOVIĆ:P4853,p.6
PEKAZ	SELIMA	ZEDIRA	03/03/1950	Female	A.MAŠOVIĆ:P4853,p.6(FaN Zecir)
Ključ A.7.1					
BEĆIREVIĆ	Denis	Refik	01/01/1987	Male	REDACTED; A.MAŠOVIĆ:P4853,p.6; P4878,p.10; P4880,p.15
BEĆIREVIĆ	Muharema	Osman	27/06/1962	Female	REDACTED; A.MAŠOVIĆ:P4853,p.6; P4878,p.10 (DOB 17/06/1962); P4880,p.13; see also A.MAŠOVIĆ:P4850,pp.43-44
BEĆIREVIĆ	Meris	Refik	28/09/1982	Male	REDACTED; A.MAŠOVIĆ:P4853,p.6; P4878,p.10; P4880,p.13; see also A.MAŠOVIĆ:P4850,pp.43-44
BEĆIREVIĆ	Refik	Ibrahim	17/09/1958	Male	REDACTED; A.MAŠOVIĆ:P4853,p.6; P4878,p.10 (DOB 17/08/1958); P4880,p.12 (DOB 27/08/1958); see also A.MAŠOVIĆ:P4850,pp.43-44
BEČIĆ	Esmā	Aiz	20/04/1976	Female	A.MAŠOVIĆ:P4853,p.7; P4878,p.10; P4880,p.8; see also A.MAŠOVIĆ:P4850,pp.43-44
BEČIĆ	Hamdo	Aiz	20/07/1966	Male	A.MAŠOVIĆ:P4853,p.7; P4878,p.10; P4880,pp.8-9; see also A.MAŠOVIĆ:P4850,pp.43-44
BEČIĆ	Refika	Safet	06/09/1971	Female	A.MAŠOVIĆ:P4853,p.7; P4878,p.10; P4880,p.9 (LN REČIĆ); see also A.MAŠOVIĆ:P4850,pp.43-44
DRAGANOVIĆ	Fikret	Smail	06/05/1948	Male	REDACTED; A.MAŠOVIĆ:P4853,p.7; P4878,p.10; P4880,p.14; see also A.MAŠOVIĆ:P4850,pp.43-44
DRAGANOVIĆ	Ibrahim	Jusuf	01/01/1921	Male	REDACTED; A.MAŠOVIĆ:P4853,p.7; P4878,p.10; P4880,p.10
KERANOVIĆ	Fadila	Atif	01/01/1955	Female	REDACTED; A.MAŠOVIĆ:P4853,p.7; P4878,p.10; P4880,p.11; see also A.MAŠOVIĆ:P4850,pp.43-44
KUMALIĆ	Ibrahim	Mumin	01/01/1953	Male	REDACTED; A.MAŠOVIĆ:P4853,p.7; P4878,p.10; P4880,p.10

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
SILAJDŽIĆ	Hava	Dedo	17/06/1940	Female	A.MAŠOVIĆ:P4853,p.7; P4880.p.18 (DOB 1946); see also A.MAŠOVIĆ:P4850,p.44
Ključ A.7.2					
BRKović	Ilfad	Šaban	08/09/1949	Male	P623.p.2; KDZ056:P686,p.34; REDACTED; P531.p.2; A.MAŠOVIĆ:P4853,p.7
BRKović	Nisveta	Ilfad	12/08/1983	Female	P622.p.9 (FaN Ilfada, DOB 14/08/83); KDZ056:P686,pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
BRKović	Rasema	Jusuf	01/01/1954	Female	P622; KDZ056:P686,pp.30-32; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
DEDIĆ	Mehmed	Smajo	28/09/1955		P623.p.2; KDZ056:P686,p.34; REDACTED; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	AMEL	ZIJAD	24/05/1979	Male	A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Amela	Zijad	23/09/1983	Female	P622.p.9; KDZ056:P686,pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Ekrem	Alem	21/10/1960	Male	P623.p.2; KDZ056:P686,p.34; REDACTED; P531.p.1; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Hašim	Hajro	12/01/1958	Male	KDZ056:P686,pp.11-12,30-32; P622,pp.12-13; REDACTED; P531,p.2; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Hajro	Hašim	15/02/1931	Male	P622,pp.2-3; KDZ056:P686,pp.30-32; REDACTED; P531,p.2; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Izet	Sulejman	10/04/1966	Male	P622.p.18; KDZ056:P686,pp.30-32; REDACTED; P531.p.1; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Rubija	RAMO	21/09/1956	Female	P622.p.6; KDZ056:P686,pp.30-32; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Senad	Fehrat	01/02/1976	Male	KDZ056:P686,pp.20,34; P623,p.2; REDACTED; P531,p.2; A.MAŠOVIĆ:P4853,p.7 (FaN Fahret)
HADŽIĆ	Suad	Sulejman	18/01/1964	Male	P623.p.2 (FN Suvad); KDZ056:P686.p.34; REDACTED; P531,p.1; A.MAŠOVIĆ:P4853,p.7
HADŽIĆ	Zijad	Bajro	05/12/1957	Male	P623,p.2; KDZ056:P686,p.34; REDACTED; P531,p.2; A.MAŠOVIĆ:P4853,p.7
ISLAMAGIĆ	Hamdija	Pašo	01/11/1953	Male	KDZ056:P686,pp.9-10 (FN Hamdo); P622,pp.16-17 (FaN Paša); REDACTED; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7
JUSIĆ	Azemina	Latif	05/11/1973	Female	P622,p.5; KDZ056:P686,pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.7

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
JUSIĆ	Emira	Latif	19/09/1978	Female	P622.p.6; KDZ056:P686.p.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.7
JUSIĆ	Enisa	Šaban	02/11/1970	Female	P622.p.10; KDZ056:P686.p.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.7
JUSIĆ	Hilimo	Hilimija	03/01/1975	Male	KDZ056:P686.p.13, 30-32; P622.p.7; REDACTED; P531.p.1; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.7
JUSIĆ	Latif	Nazif	19/02/1931	Male	P623.p.2; KDZ056:P686.p.34; REDACTED; P531.p.1; A.MAŠOVIĆ:P4853.p.7
JUSIĆ	Nedžad	Latif	08/07/1970	Male	KDZ056:P686.p.13,34; P623.p.2; REDACTED; P531.p.1; A.MAŠOVIĆ:P4853.p.7
JUSIĆ	Nermin	Bajro	23/08/1973	Male	P622.p.21-22; KDZ056:P686.p.30-32; REDACTED; P531.p.1; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.7
JUSIĆ	Osman	Ćamil	17/02/1931	Male	KDZ056:P686.p.13 (FN Osme), 30-32; P622.p.1-2; REDACTED; P531.p.2; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
JUSIĆ	Ramiza	Adil	01/01/1922		P622.p.3; KDZ056:P686.p.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
JUSIĆ	Samira	Latif	06/02/1977	Female	P622.p.6-7; KDZ056:P686.p.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEŠIĆ	Gane	Đulejman	01/04/1930	Male	P622.p.15-16; KDZ056:P686.p.30-32; REDACTED; P531.p.2; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEŠIĆ	Isak	Emsud	10/10/1973	Male	KDZ056:P686.p.11-12,30-32; P622.p.18-19; REDACTED; P531.p.2; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8 FaN (Mensud)
MEŠIĆ	Isma	Himzo	01/01/1935	Female	P622.p.3-4; KDZ056:P686.p.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEŠIĆ	Ismet	Emsud	16/03/1977	Male	KDZ056:P686.p.20,34; P623.p.2; REDACTED; P531.p.2; A.MAŠOVIĆ:P4853.p.7
MEDANOVIĆ	Šefik	Hamdija	03/02/1965	Male	P622.p.19; KDZ056:P686.p.30-32; REDACTED; P531.p.1; see also P4882 and P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Ćamil	Ferid	29/11/1955	Male	KDZ056:P686.p.11-12,34; P623.p.2; REDACTED; P531.p.1; A.MAŠOVIĆ:P4853.p.7
MEDANOVIĆ	Arif	Salko	11/01/1908	Male	P622.p.17-18; KDZ056:P686.p.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Ahmo	Hamid	01/01/1939		P623.p.2; KDZ056:P686.p.34; REDACTED; A.MAŠOVIĆ:P4853.p.7

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
MEDANOVIĆ	Enes	Ferid	30/03/1973	Female	P623.p.2; KDZ056:P686.p.34; REDACTED; P531.p.1; A.MAŠOVIĆ:P4853.p.7
MEDANOVIĆ	Enesa	Ferid	01/01/1973	Female	P622; KDZ056:P686.pp.30-32; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Vahid	Mustafa	19/07/1928	Male	P623.p.2; KDZ056:P686.p.34; REDACTED; P531.p.2; A.MAŠOVIĆ:P4853.p.7 (FN Vahid)
MEDANOVIĆ	Fatima	Mumin	12/11/1938	Female	P622.p.10; KDZ056:P686.pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Ferida	Ćamil	10/04/1976	Female	P622.p.8; KDZ056:P686.pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Hadžira	Derviš	17/07/1927	Female	P622.p.4; KDZ056:P686.pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Hali	Hasan	26/10/1972	Male	P622.pp.13-14; KDZ056:P686.pp.30-32; REDACTED; P531.p.1; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Hasan	Adem	28/04/1949	Male	P622.pp.7-8; KDZ056:P686.pp.30-32; REDACTED; P531.p.1; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	HAVA	Mehmed	23/11/1964	Female	P622; KDZ056:P686.pp.30-32; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Indira	Suad	31/03/1985	Female	P622.pp.4-5; KDZ056:P686.pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Mirdheta	Šefik	01/01/1972	Female	P622.pp.5-6; KDZ056:P686.pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Mujo	Hasan	12/04/1979	Male	P622.p.20; KDZ056:P686.pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Safet	Ferid	14/10/1966	Male	P622.p.13; KDZ056:P686.pp.30-32; REDACTED; P531.p.1; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Suad	Vahid	30/03/1962	Male	P623.p.2; KDZ056:P686.p.34; REDACTED; P531.p.1; A.MAŠOVIĆ:P4853.p.7
MEDANOVIĆ	Sulejman	Hasan	19/02/1933	Male	KDZ056:P686.p.22; REDACTED; P531.p.2; A.MAŠOVIĆ:P4853.p.8
MEDANOVIĆ	Teufik	Hamdija	24/09/1959	Male	P622.pp.20-21; KDZ056:P686.pp.30-32; REDACTED; P531.p.1; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8
OKIĆ	Nasiha	Husein	01/04/1971	Female	P622.pp.8-9; KDZ056:P686.pp.30-32; REDACTED; see also P4882 and A.MAŠOVIĆ:P4850.p.45; A.MAŠOVIĆ:P4853.p.8

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
OSMANOVIĆ	Karanfil	Abid	03/05/1941	Male	P622,pp.14-15; KDZ056:P686,pp.30-32; REDACTED; P531,p.1; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.8
OSMANOVIĆ	Rufad	Karanfil	14/03/1941	Male	P622,p.16; KDZ056:P686,pp.11-12 (FN Reuf),30-32; REDACTED; P531,p.1; see also P4882 and A.MAŠOVIĆ:P4850,p.45; A.MAŠOVIĆ:P4853,p.8 (DOB 1971)
OSMANOVIĆ	Tehvid	Karanfil	29/05/1961	Male	P623,p.2; KDZ056:P686,p.34; REDACTED; P531,p.1; A.MAŠOVIĆ:P4853,p.7
Ključ A.7.3					
ŠLJIVAR	Sabit	Abid	08/04/1918	Male	P4877,pp.7,10; P4878,p.6 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43
ŠUŠNJAR	Almedin	Meho	14/02/1973	Male	P3362,p.3; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.23
ŠUŠNJAR	Meho	Latif	10/10/1940	Male	P3362,p.6; see also KDZ075:T.19025-19026; P4878,p.5 (DOB 1941); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.78-79 (DOB 1941)
ČEHIĆ	Adnan	Hamdija	17/02/1972	Male	P3362,p.6; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.11-12
ČEHIĆ	Ahmo	Hašim	19/08/1925	Male	P3362,p.8; see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.51
ČEHIĆ	Asim	Latif	21/02/1951	Male	P3361,p.4; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.60
ČEHIĆ	Bećo	Ahmet	23/02/1907	Male	P4877,pp.7,13; P4878,p.6 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43
ČEHIĆ	Efraim	Abid	01/05/1946	Male	P4878,p.3 (LN ŠEHIĆ); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.45-46
ČEHIĆ	Elvir	Samed	09/05/1971	Male	P3361,p.7 (FN Elvir, DOB 09/05/1961); see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.11 (FaN Samo)
ČEHIĆ	Hamdija	Sulejman	07/03/1944	Male	P4877,pp.7,8-9; P4878,p.5 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43
ČEHIĆ	Latif	Meho	19/04/1922	Male	P3361,p.2; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.73

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
ČEHIĆ	Miralem	Derim	23/08/1932	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10 (FaN Cerim); P3363,pp.61-62
ČEHIĆ	Nail	Smajo	21/09/1931	Male	P3362,p.5 (DOB 21/05/1931); see also KDZ075:T.19025-19026; P4878,p.4 (DOB 21/05/1931); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.71 (DOB 21/05/1931)
ČEHIĆ	Nedžad	Hakija	17/08/1960	Male	P3361,p.6; see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.15
ČEHIĆ	Rasim	Ahmet	17/05/1932	Male	P3362,p.8; see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.56
ČEHIĆ	SUVAD	Ahmo	16/03/1963	Male	P3362,p.11; see also KDZ075:T.19025-19026; P4878,p.3 (DOB 18/03/1963); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.58
ČEHIĆ	Sulejman	Haso	07/05/1924	Male	P3362,p.8 (DOB 05/07/1922); see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.46
ČEHIĆ	Teufik	Čazim	12/02/1972	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.69-70
ČAJIĆ	Ale	Muharem	09/04/1955	Male	P3361,p.3; see also KDZ075:T.19018-19019,19023; REDACTED; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.40-41
ČAJIĆ	Šemso	Vahid	11/10/1964	Male	P3362,p.9; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.13
ČAJIĆ	Smajo	Hakija	11/10/1963	Male	P3362,p.7; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.13
AJKIĆ	Mujo	Jusuf	12/01/1964	Male	P3362,p.3; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.13
AVDIĆ	Šefko	Rašid	06/05/1937	Male	P3361,p.2; see also KDZ075:T.19018-19019; see also A.MAŠOVIĆ:P4850,pp.44-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.44
AVDIĆ	Abid	Muho	16/10/1933	Male	P3362,p.3 (FN Abib); see also KDZ075:T.19025-19026; P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,p.85
AVDIĆ	Abid	Crnko	13/03/1933	Male	P3362,p.1; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,p.75

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
AVDIĆ	Alija	Ahmo	27/04/1954	Male	P3362,p.4; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.8
AVDIĆ	Almas	Ramo	05/03/1940	Male	P3362,p.5; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.8 (FN Almaz, DOB1939)
AVDIĆ	Asim	Dedo	25/05/1928	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,p.63
AVDIĆ	Besim	Rasim	24/04/1967	Male	P3362,p.5; see also KDZ075:T.19025-19026; P4878,p.4 (DOB 1957); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED;
AVDIĆ	Elvir	Alija	19/08/1972	Male	A.MAŠOVIĆ:P4853,p.8; P3363,p.69 (DOB 1957)
AVDIĆ	Emsud	Jusuf	07/02/1953	Male	P3362,p.7; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.8 (DOB 1975)
AVDIĆ	Enes	Ramiz	13/09/1953	Male	P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,pp.25-26
AVDIĆ	Ermin	Osmo	03/03/1968	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,p.68
AVDIĆ	Fehret	Hamed	30/01/1965	Male	P3362,p.8; see also KDZ075:T.19025-19026; P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,p.87
AVDIĆ	Ferid	Hasib	11/10/1942	Male	P3362,p.7; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.8 (DOB 1964)
AVDIĆ	Feriz	Aziz	13/07/1926	Male	P3361,p.5 (FaN Habir); see also KDZ075:T.19018-19019; P3637,p.10; see also A.MAŠOVIĆ:P4850,pp.44-45; A.MAŠOVIĆ:P4853,p.8 (FaN Habir); see also P3363
AVDIĆ	Fuad	Abid	10/06/1961	Male	P3362,p.8; see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,p.39
AVDIĆ	Habir	Feriz	05/02/1955	Male	P3362,p.7; see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.8; P3363,pp.20-21
AVDIĆ	Hajrudin	Hamdija	17/08/1959	Male	P3361,p.4; see also KDZ075:T.19018-19019; P4878,p.4 (FN Kabir); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED;
AVDIĆ	Hakija	Hamdo	18/05/1932	Male	A.MAŠOVIĆ:P4853,p.9; P3363,p.62 (FaN Feris)
					P3361,p.5; see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED;
					A.MAŠOVIĆ:P4853,p.9; P3363,pp.26-27
					REDACTED; see also A.MAŠOVIĆ:P4850,pp.44-45;
					A.MAŠOVIĆ:P4853,p.9; P3363,pp.43-44 (FaN Bando, DOB 18/05/1937)

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AVDIĆ	Hamdija	Adem	05/06/1931	Male	P3361,p.4; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.8 (DOB 1935)
AVDIĆ	Ibrahim	Hamed	10/02/1958	Male	P3362,p.4; see also KDZ075:T.19025-19026; P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; A.MAŠOVIĆ:P4853,p.13; P4879,pp.19-20
AVDIĆ	Ismet	Tahir	28/10/1959	Male	P3362,p.7; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.13
AVDIĆ	Muharem	Hamid	12/03/1950	Male	P3361,p.2; see also KDZ075:T.19018-19019; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,pp.54-55
AVDIĆ	Nail	Adem	21/05/1928	Male	P3362,p.5; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.63
AVDIĆ	Nijaz	Osmo	04/06/1966	Male	P3362,p.4; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.10
AVDIĆ	Osman	Ahmo	07/07/1948	Male	P3362,p.3; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.9
AVDIĆ	Refik	Hamid	20/08/1964	Male	P3361,p.4; see also KDZ075:T.19018-19019; P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.87
AVDIĆ	Sead	Smajo	23/02/1970	Male	P3362,p.7; see also KDZ075:T.19025-19026; P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9 (FN Sejad); P3363,p.87
AVDIĆ	Senad	Islam	21/08/1965	Male	P3361,p.2; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.13
AVDIĆ	Smail	Šerif	07/11/1946	Male	P3361,p.2; see also KDZ075:T.19018-19019,19023; P4878,p.4 (FN Smajil); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.66 (FN Smajil)
AVDIĆ	Smajil	Crnko	19/08/1949	Male	P3362,p.5 (FaN Crnka); see also KDZ075:T.19025-19026; KDZ075:T.19023; P4878,p.3 (FN Smail); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.41 (FN Smail, DOB 19/08/1949)
AVDIĆ	Tahir	Muho	16/10/1938	Male	P3362,p.4; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.9
AVDIĆ	Zijad	Abid	01/01/1965	Male	P3362,p.7; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.9

Municipalities Victim List

<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
BAHTAGIĆ	Enver	Ahmo	26/04/1953	Male	P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; P4879,p.16; A.MAŠOVIĆ:P4853,p.13
BAJRAMOVIĆ	Ejub	Islam	03/10/1940	Male	P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; P4879,pp.16-17; A.MAŠOVIĆ:P4853.p.13
BAJRIĆ	Ibrahim	Ibro	12/05/1931	Male	P3361,p.6; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.71
BALAGIĆ	Abid	Meho	12/05/1921	Male	P3361,p.3 (DOB 05/12/1921); see also KDZ075:T.19018-19019; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,pp.39-40
BALAGIĆ	Avdo	Lutfija	20/02/1964	Male	P3362,p.6; see also KDZ075:T.19025-19026; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,pp.18-19 (FN Avtro)
BALAGIĆ	Derviš	Meho	15/08/1923	Male	P3362,p.8; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.9 (DOB 1927)
BALAGIĆ	Fikret	Arif	17/04/1940	Male	P3361,p.3; see also KDZ075:T.19018-19019; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.42
BALAGIĆ	Mehmed	Derviš	15/07/1967	Male	P3362,p.5; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.13
BALAGIĆ	Vehbija	Mustafa	13/05/1937	Male	P3361,p.5; see also KDZ075:T.19018-19019; P3637,p.10; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.22
BOTONJIĆ	Ćamil	Sulejman	18/09/1930	Male	P3362,p.11; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.12
BOTONJIĆ	Aziz	Ibro	01/06/1932	Male	P3362,p.10; see also KDZ075:T.19025-19026; P3637,p.10 (FN Aiz); P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363 pp.23-24 (FN Aiz)
BOTONJIĆ	Džafer	Rifet	09/01/1974	Male	P3362,p.10 (DOB 03/01/1974); see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.73 (DOB 03/01/1974)
BOTONJIĆ	Ejub	Musa	27/02/1932	Male	P3361,p.6; see also KDZ075:T.19018-19019; P4878,p.4 (FaN Muso); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.66
BOTONJIĆ	Fadil	Ragib	27/01/1968	Male	P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,pp.81-82

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
BOTONJIĆ	Feriz	Omer	03/08/1939	Male	P3362,p.10; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2 (DOB 1937); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,pp.12-13 (DOB 1937)
BOTONJIĆ	Hamdija	Iso	15/03/1939	Male	P3362,p.6 (FaN Sejo); see also KDZ075:T.19025-19026; P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; P4879,pp.14-15; A.MAŠOVIĆ:P4853,p.13
BOTONJIĆ	Hamed	Hakija	01/03/1960	Male	P3362,p.9 (FN Hamep); see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.57
BOTONJIĆ	Hamid	Ćamil	22/06/1926	Male	P3362,p.9 (DOB 22/06/1962); see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,pp.55-56 (DOB 1962)
BOTONJIĆ	Hikmet	Husnija	23/05/1966	Male	see also A.MAŠOVIĆ:P4850,pp.44-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.45
BOTONJIĆ	Hilmo	Redžo	01/05/1933	Male	P3362,p.10 (DOB 02/05/1933); see also KDZ075:T.19025-19026; P3637,p.10 (FN Ramo); P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.16 (FaN Redža)
BOTONJIĆ	Husein	Zejnir	25/03/1942	Male	P3362,p.10; see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.22
BOTONJIĆ	Muharem	Huso	29/06/1964	Male	P3362,p.6; see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.20
BOTONJIĆ	Mujo	Muharem	31/01/1930	Male	P3361,p.5; see also KDZ075:T.19018-19019; P4878,p.4 (DOB 20/05/1930); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.64 (DOB 20/05/1930)
BOTONJIĆ	Nail	Abid	10/08/1932	Male	P3362,p.11 (DOB 24/06/1932); see also KDZ075:T.19025-19026; P3637,p.9 (DOB 1927); P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; A.MAŠOVIĆ:P4853,p.13; P4879,pp.20-21 (FaN Abida)
BOTONJIĆ	Nail	Redžo	24/03/1924	Male	P3362,p.9; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.9 (DOB 1927)
BOTONJIĆ	Nijaz	Mujo	07/10/1965	Male	P3361,p.1 (LN BATONJIĆ, DOB 07/10/61); see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.67

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
BOTONJIĆ	Najil	Redžo	24/03/1927	Male	P3362,p.9 (FN Nail, DOB 24/03/1924); see also KDZ075:T.19025-19026; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.6
BOTONJIĆ	Omer	Hamid	10/01/1931	Male	P3361,p.6 (FaN Amid); see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,p.70
BOTONJIĆ	Ramiz	Omer	15/05/1925	Male	P3362,p.9; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2 (DOB 1929); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.9; P3363,pp.13-14
BOTONJIĆ	Rifet	Pašo	27/08/1936	Male	P3362,p.10 (DOB 28/08/1936); see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.7-8 (FaN Paša)
BOTONJIĆ	Sabahudin	Ramiz	09/10/1967	Male	P3362,p.9; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.60 (DOB 11/05/70)
BOTONJIĆ	Sabrija	Sabit	12/04/1966	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.61
BOTONJIĆ	Sadik	Dedo	23/11/1961	Male	P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.42-43
BOTONJIĆ	Saim	Aiz	25/03/1967	Male	P4878,p.3 (FaN Aziz); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; see also P3363
BOTONJIĆ	Suad	Hilmo	14/09/1969	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10 (FN Suvad); P3363,pp.58-59 (DOB 1965)
BOTONJIĆ	Sulejman	Ćamil	28/08/1965	Male	P3362,p.11; see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.48
BOTONJIĆ	Vehbija	Latif	21/05/1945	Male	P3362,p.3; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.67
BOTONJIĆ	Zijad	Muho	14/04/1953	Male	P3362,p.10; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.59-60
BOTONJIĆ	Zuhdija	Mehmed	17/11/1933	Male	P3362,p.11; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.15
BOTONJIĆ	Ćazim	Ala	01/01/1938	Male	P4877,pp.7,10 (LN BUTONJIĆ); P4878,p.6 (FaN Ale) (see also A.MAŠOVIĆ:P4850,p.43); A.MAŠOVIĆ:P4850,p.43

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
CRNOLIC	Mesud	Fejzo	03/01/1953	Male	P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.83 (LN CRNALIĆ)
DŽAFERAGIĆ	Abid	Arif	02/09/1953	Male	P4877,pp.7,13-14; P4878,p.6 (DOB 1938) (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4853,p.13; A.MAŠOVIĆ:P4850,p.43
DŽAFERAGIĆ	Ahmet	Hakija	01/07/1955	Male	P3361,p.1; see also KDZ075:T.19018-19019; P3637,p.10; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.24
DŽAFERAGIĆ	Almir	Šemso	17/05/1990	Male	P4878,p.5 (DOB 25/05/1988); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.85 (DOB 25/05/1988)
DŽAFERAGIĆ	Amila	Šemso	29/02/1992	Female	P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.84-85
DŽAFERAGIĆ	Besima	Rasim	01/04/1962	Female	P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.77
DŽAFERAGIĆ	Hamdija	Musa	15/07/1932	Male	P3361,p.2; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363, p.68
DŽAFERAGIĆ	Mehmed	Muho	08/07/1914	Male	P4878,p.5 (FaN Meho, DOB 11/08/1914); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.76-77 (DOB 11/08/1914)
DŽAFERAGIĆ	Safet	Arif	03/09/1955	Male	P3362,p.4; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.11
DŽAFERAGIĆ	Vehbija	Daut	04/12/1962	Male	P3362,p.2; see also KDZ075:T.19025-19026; P3637,p.9 (FaN Daur); P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.14
DERVIŠEVIĆ	Aiz	Huso	28/08/1972	Male	P3362,p.5 (FN Aziz); see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2 (FN Aziz); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.7
DERVIŠEVIĆ	Husein	Huso	13/08/1959	Male	P3361,p.3; see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,p.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.6
DERVIŠEVIĆ	Omer	Feto	09/11/1964	Male	P3361,p.5 (FaN Feta); see also KDZ075:T.19018-19019,19023; REDACTED; P4878,p.3 (FaN Feta); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.36 (FaN Feta)

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
DOŠEN	Mate	Karlo	23/02/1933	Male	P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; P4879,pp.13-14; A.MAŠOVIĆ:P4853,p.13
DOMAZET	Asim	Hamed	12/04/1948	Male	P3361,p.6; see also KDZ075:T.19018-19019; P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; P4879,p.23; A.MAŠOVIĆ:P4853,p.13
DOMAZET	Asmir	Hamdija	27/09/1969	Male	P3361,p.1 (FN Asmar); see also KDZ075:T.19018-19019; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.21
DOMAZET	Avdo	Hamdija	26/05/1973	Male	P3361,p.1; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.10
DOMAZET	Derviš	Ibrahim	25/10/1932	Male	P3362,p.2; see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.3 (FN Dervić); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.24
DOMAZET	Fadil	Ahmo	04/05/1946	Male	P3362,p.7; see also KDZ075:T.19025-19026; P3637,p.10 (LN DOMAZEL); P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.20
DOMAZET	Fahrudin	Safet	02/01/1970	Male	P3362,p.6; see also KDZ075:T.19025-19026; P4878,p.41; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,pp.70-71
DOMAZET	Fajka	Salko	07/06/1923	Female	P4877,pp.7,9; P4878,p.6 (FN Hasib) (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43
DOMAZET	Fuad	Feriz	03/02/1962	Male	P3362,p.1; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; see also P3363
DOMAZET	Hajrudin	Fehim	06/05/1971	Male	P3362,p.7 (FaN Safet, DOB 16/05/1971); see also KDZ075:T.19025-19026; P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.13; P3363,p.78 (DOB 16/05/1971)
DOMAZET	Hamdija	Hamed	15/04/1946	Male	P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.56
DOMAZET	Hamed	Avdo	01/09/1922	Male	P3361,p.2; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.61
DOMAZET	Hamid	Ćerim	03/09/1931	Male	P3361,p.5; see also KDZ075:T.19018-19019; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; see also P3363
DOMAZET	Hazim	Ahmo	08/04/1952	Male	P3361,p.2; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.13

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
DOMAZET	Husein	Derva	02/05/1965	Male	P3362,p.1 (FaN Derviš); see also KDZ075:T.19025-19026; P4877,pp.5-6,8; P4878,p.6 (FaN Dervo, DOB 1963) (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43
DOMAZET	Islam	Feho	31/03/1923	Male	P3362,p.8; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.10; P3363,p.63
DOMAZET	Mehmed	Sulejman	06/02/1971	Male	P3361,p.1; see also KDZ075:T.19018-19019; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.17-18
DOMAZET	Meho	Ibro	30/08/1932	Male	P3361,p.2; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.62
DOMAZET	Nail	Adil	19/10/1931	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.65
DOMAZET	Rifet	Safet	01/07/1968	Male	P3362,p.6; see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.37
DOMAZET	Safet	Ibrahim	17/01/1936	Male	P3362,p.5; see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.37-38
DOMAZET	Zijad	Atif	23/06/1952	Male	P3361,p.1 (FN Zihad, DOB 23/06/51); see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.10-11
HODŽIĆ	Abid	Muharem	02/04/1930	Male	P3362,p.7; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.69
HODŽIĆ	Adil	Aziz	15/05/1923	Male	P3362,p.1 (DOB 03/05/1923); see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.54
HODŽIĆ	Derviš	Nurija	13/08/1931	Male	P3362,p.1; see also KDZ075:T.19025-19026; P4878,p.3 (FN Dervić); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.57
HODŽIĆ	Osman	Ibro	19/02/1934	Male	P3361,p.2; see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.8
HODŽIĆ	Rufad	Abid	17/10/1956	Male	P3362,p.4; see also KDZ075:T.19025-19026; KDZ075:P3359,p.26; see also A.MAŠOVIĆ:P4850,pp.44-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; see also P3363

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
JAŠAREVIĆ	Almir	Sabit	15/01/1974	Male	P3637 p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; P3363,p.7
JAŠAREVIĆ	Bego	Ibrahim	10/01/1951	Male	P3362,p.4; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.75
JAŠAREVIĆ	Besim	Bego	13/03/1939	Male	P3362,p.6; see also KDZ075:T.19025-19026; P4878,p.2; see also A.MAŠOVIĆ:P4850,p.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.19
JAŠAREVIĆ	Ejub	Ragib	01/01/1929	Male	P4877,pp.15-17,21 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43; P4878,p.6 (see also A.MAŠOVIĆ:P4850,p.43)
JAŠAREVIĆ	Enes	Rasim	24/03/1963	Male	P3362,p.4 (DOB 29/03/1963); see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.18 (DOB 1965)
JAŠAREVIĆ	Hasib	Sabit	18/01/1968	Male	P3361,p.7; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.11
JAŠAREVIĆ	Ismet	Ibrahim	12/05/1959	Male	P3362,p.3; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.11 (DOB 1962)
JAŠAREVIĆ	Juso	Ejub	01/01/1955	Male	P4877,pp.15-17,22 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43; P4878,p.6 (see also A.MAŠOVIĆ:P4850,p.43)
JAŠAREVIĆ	Kemal	Bego	16/05/1941	Male	P3362,p.9; see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.17
JAŠAREVIĆ	Raif	Rasim	21/07/1961	Male	P3362,p.7; see also KDZ075:T.19025-19026; P4878,p.3 (DOB 06/1961); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.25 (DOB 06/1961)
JAŠAREVIĆ	Sabit	Sećer	10/10/1938	Male	P3362,p.4 (FaN Šaćir); see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2 (FaN Šaćir, DOB 1939); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.14 (FaN Bećir)
JAŠAREVIĆ	Senad	Rasim	08/05/1961	Male	P3362,p.3; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.11 (DOB 1965)
KAPIDŽIĆ	Bećir	Bećo	10/04/1945	Male	P3362,p.6 (FaN Beća, DOB 01/08/1945); see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.2 (DOB 01/08/1945); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.16 (FN Bećir, DOB 01/08/1945)

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
KAPIDŽIĆ	Jasmin	Bećir	21/03/1969	Male	P3362,p.5; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.13
KUBURAŠ	Muharem	Huso	23/02/1933	Male	P3361,p.1; see also KDZ075:T.19018-19019; P4878,p.3 (FaN Musa); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.38-39
KUBURAŠ	Nihad	Ramiz	11/05/1970	Male	P3361,p.7; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.60-61(FaN Esmi?)
MEŠANOVIĆ	Admir	Hajrudin	03/11/1971	Male	P3361,p.6; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.13
MEŠANOVIĆ	Asim	Vehbija	27/09/1968	Male	P3362,p.2; see also KDZ075:T.19025-19026; P4878,p.4 (FaN Rehbija); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.65-66
MEŠANOVIĆ	Asmir	Vehbija	21/04/1972	Male	P3362,p.2; see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.88
MEŠANOVIĆ	Hajrudin	Adil	21/08/1944	Male	P3361,p.6; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.13 (DOB 1974)
MEŠANOVIĆ	Muhamed	Ekrem	16/03/1966	Male	P3361,p.5; see also KDZ075:T.19018-19019; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.47-48 (LN MUŠANOVIĆ)
MEŠANOVIĆ	Suad	Latif	27/08/1957	Male	P3362,p.2 (FN Suvad, DOB 28/08/1957); see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,p.26
MEŠANOVIĆ	Zifad	Adam	24/03/1962	Male	P3362,p.2; see also KDZ075:T.19025-19026; P4878,p.3 (LN MUJEZINOVIC); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.11; P3363,pp.41-42 (LN MUJEZINOVIC)
MUJEZINOVIC	Asim	Meho	01/01/1924	Male	P3362,p.11; see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.3 (DOB 1919); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.21(DOB 1919)
MUJEZINOVIC	Emir	Rasim	30/06/1964	Male	P3362,p.2; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.72
MUJEZINOVIC	Hamdija	Hasan	25/07/1933	Male	P3362,p.8; see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.14-15

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
MUJEZINOVIC	Hilmo	Salko	20/02/1932	Male	P3361,p.7; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.12
MUJEZINOVIC	Ismet	Osman	26/05/1971	Male	P3361,p.1; see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363 p.25
MUJEZINOVIC	Muharem	Sulejman	19/07/1931	Male	P3362,p.10 (DOB 07/09/1931); see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.15-16
MUJEZINOVIC	Nail	Huso	18/01/1927	Male	P3362,p.11 (DOB 27/02/1927); see also KDZ075:T.19025-19026; P3637,p.10; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.17
MUJEZINOVIC	Osman	Haso	26/06/1934	Male	P3361,p.1; see also KDZ075:T.19018-19019; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.49-50
MUJEZINOVIC	Ramiz	Jusuf	02/08/1948	Male	P3361,p.3; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.13
MUJEZINOVIC	Smail	Hasib	20/09/1954	Male	P4877,pp.5-6,7-8; P4878,p.6 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4853,p.13; A.MAŠOVIĆ:P4850,p.43
MUJEZINOVIC	Sahib	Huso	18/03/1925	Male	P4877,pp.7,9; P4878,p.6 (FN Hasib) (see also A.MAŠOVIĆ:P4850,p.43); A.MAŠOVIĆ:P4850,p.43
MULAHMETOVIC	Adil	Ibro	04/09/1935	Male	P3362,p.3; see also KDZ075:T.19025-19026; A.MAŠOVIĆ:P4853,p.12
MULAHMETOVIC	Samir	Ale	01/10/1974	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.74
MULAHMETOVIC	Smajil	Ale	19/11/1929	Male	P3362,p.11; see also KDZ075:T.19025-19026; P3637,p.9 (LN MULALUNELOVIC); P4878,p.2 (LN MULAAHMETOVIC, DOB 1928); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.9 (FaN Ala, DOB 19/11/1928)
OMANOVIC	Šefkija	Šerim	28/09/1952	Male	P4877,pp.7,12; P4878,p.6 (FaN Cerim) (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43; A.MAŠOVIĆ:P4853,p.13
OMANOVIC	Abid	Ibrahim	03/03/1907	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.74
OMANOVIC	Adil	Abid	09/01/1934	Male	P3361,p.5; see also KDZ075:T.19018-19019; P4878,p.3 (FaN Asid, DOB 1937); see also A.MAŠOVIĆ:P4850,pp.43; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.58 (DOB 1937)

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
OMANOVIĆ	Asim	Hurem	09/12/1935	Male	P4877,pp.7,11; P4878,p.6 (DOB 1939) (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43; A.MAŠOVIĆ:P4853,p.13
OMANOVIĆ	Elkaz	Osmo	11/01/1936	Male	P3361,p.7 (FN Elhad); see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.72-73
OMANOVIĆ	Enid	Hilimo	31/12/1964	Male	P3361,p.8 (FN Eniz); see also KDZ075:T.19018-19019; P3637,p.10; P4878,p.3 (DOB 1966); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.22-23
OMANOVIĆ	Esad	Mumin	12/04/1929	Male	P3361,p.6; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.12
OMANOVIĆ	Hilimo	Hamid	27/02/1934	Male	P3361,p.7 (DOB 28/02/1934); see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.59
OMANOVIĆ	Mustafa	Mujo	02/04/1928	Male	P3362,p.1 (DOB 04/03/1928); see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; see also P3363
OMANOVIĆ	Omer	Nazif	12/01/1937	Male	P3362,p.6; see also KDZ075:T.19025-19026; P4878,p.4 (FaN Razif); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.76
OMANOVIĆ	Omer	Mustafa	19/07/1910	Male	P3362,p.1 (DOB 15/03/1910); see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.64
OMANOVIĆ	Pašo	Osman	01/01/1941	Male	P4877,pp.7,12-13; P4878,p.6 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4850,p.43; A.MAŠOVIĆ:P4853,p.13
OMANOVIĆ	Saudin	Aiz	19/07/1970	Male	P3361,p.4 (FN Suad, FaN Ajiz); see also KDZ075:T.19018-19019; P4878,p.3 (FaN Aziz); see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.36-37
OMANOVIĆ	Tehvid	Almaz	12/01/1961	Male	P4877,pp.7,11; P4878,p.6 (see also A.MAŠOVIĆ:P4850,p.43); REDACTED; A.MAŠOVIĆ:P4853,p.13; A.MAŠOVIĆ:P4850,p.43;
OMANOVIĆ	Zuhdija	Husein	10/06/1925	Male	P3361,p.7 (DOB 06/05/1925); see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.73-74 (DOB 19/06/1925)
OMERADŽIĆ	Džemal	Mehmed	22/03/1934	Male	P3362,p.11 (DOB 28/03/1934); see also KDZ075:T.19025-19026; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.6-7 (DOB 22/07/1934)

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
OMERADŽIĆ	Ibrahim	Arif	19/02/1968	Male	P3361,p.8; see also KDZ075:T.19018-19019; A.MAŠOVIĆ:P4853,p.13 (DOB 1961)
OMERADŽIĆ	Saliko	Osman	10/03/1944	Male	P3362,p.6; see also KDZ075:T.19025-19026; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363, pp.75-76
PEHADŽIĆ	Šerif	Čerim	13/05/1962	Male	P3362,p.9 (FaN Čamil); see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED;
SINANOVIĆ	Azra	Himzo	29/05/1975	Female	A.MAŠOVIĆ:P4853,p.12; P3363,p.47
SINANOVIĆ	Lejla	Mehmed	28/06/1940	Female	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.76
SUBAŠIĆ	Fadil	Adil	10/07/1931	Male	P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.48-49 (DOB 18/06/1940)
SUBAŠIĆ	Izedin	Nazif	05/09/1964	Male	P3361,p.1; see also KDZ075:T.19018-19019; P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.64-65
ZUKANOVIĆ	Hazim	Smail	17/09/1951	Male	P4878,p.4; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.67-68 (FaN Nasif)
ZUKANOVIĆ	Husein	Husein	06/04/1925	Male	P3361,p.6 (FN Hamiz, FaN Smajil); see also KDZ075:T.19018-19019; P3637,p.9; P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.9 (FaN Smajil)
ZUKANOVIĆ	Mujaga	Adil	30/09/1954	Male	P3362,p.5 (DOB 06/04/1923); see also KDZ075:T.19025-19026; P4878,p.3; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,pp.51-52
ZUKANOVIĆ	Salih	Suljo	15/05/1923	Male	P3361,p.4; see also KDZ075:T.19018-19019; P4878,p.7 (see also A.MAŠOVIĆ:P4850,pp.43-44); REDACTED; A.MAŠOVIĆ:P4853,p.13; P4879,p.21
ZUKANOVIĆ	Smail	Mehmed	01/07/1926	Male	P3362,p.8 (FaN Murat); see also KDZ075:T.19025-19026; P3637,p.9 (DOB 1933); P4878,p.2; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.10 (DOB 13/02/1923)
Novi Grad A.9.1					
BEŠIĆ	Elma	Šućrija	01/01/1976	Female	P3361,p.6; see also KDZ075:T.19018-19019; P4878,p.5; see also A.MAŠOVIĆ:P4850,pp.43-45; REDACTED; A.MAŠOVIĆ:P4853,p.12; P3363,p.77
BEŠIĆ	Razija	Kasim	01/01/1953	Female	R.MUJKIĆ:P2314,para.48; A.MAŠOVIĆ:P4853,p.13
BRAMAJ	Šaban			Male	A.MAŠOVIĆ:P4853,p.13
DIVOLIĆ	HAMID	AHMET	02/10/1950	Male	R.MUJKIĆ:P2314,para.40 REDACTED; A.MAŠOVIĆ:P4853,p.13

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
GAČANOVIĆ	AVDO	MEHO	22/03/1944	Male	REDACTED; R.MUJKIĆ:P2314, paras.40-41; A.MAŠOVIĆ:P4853,p.14
GAČANOVIĆ	HAMID	IBRAHIM	10/01/1952	Male	A.MAŠOVIĆ:P4853,p.14
LNU	"Kriminalac"			Male	REDACTED;
MESANOVIĆ	Nihad	AGAN	15/05/1970	Male	A.MAŠOVIĆ:P4853,p.14
MUJKIĆ	Ešref	Nazif	04/10/1938	Male	A.MAŠOVIĆ:P4853,p.14
MUJKIĆ	SAMIR	RAGIB	17/09/1965	Male	REDACTED; ; A.MAŠOVIĆ:P4853,p.14 (DOB 1966)
NOVALIJA	Amir	Vejsil	06/01/1965	Male	A.MAŠOVIĆ:P4853,p.14
NOVALIJA	Vejsil	Bajro	03/06/1936	Male	A.MAŠOVIĆ:P4853,p.14
SULJIĆ	JUSUF	SALIH	20/01/1961	Male	REDACTED; A.MAŠOVIĆ:P4853,p.14
TOKMO	NIHAD	FERID	15/09/1970	Male	REDACTED; A.MAŠOVIĆ:P4853,p.14
ŽIGA	BEĆIR	MEHO	22/01/1953	Male	REDACTED; A.MAŠOVIĆ:P4853,p.14
ŽIGA	MEHO	AGO	17/04/1930	Male	REDACTED; A.MAŠOVIĆ:P4853,p.14
Prijedor A.10.1					
BAHONIĆ	Nihad	Hasan	15/03/1955	Male	REDACTED; I.MERDŽANIĆ:P03881,p.30-33; I.MERDŽANIĆ:T.2.1449
BEŠIĆ	Mustafa	Muharem	11/03/1928	Male	REDACTED;
BEGOVIĆ	Ibrahim	Šerif	01/01/1939	Male	REDACTED;
ELEZOVIĆ	Edhem	Šerif	01/06/1943	Male	REDACTED; KDZ611:P4101,p.9; A.MAŠOVIĆ:P4853,p.15
ELEZOVIĆ	Eni Amir	Edhem	14/11/1970	Male	REDACTED; KDZ611:P4101,p.9 (Hali's younger brother); A.MAŠOVIĆ:P4853,p.15
ELEZOVIĆ	Hali	Edhem	11/09/1963	Male	REDACTED; KDZ611:P4101,p.9; A.MAŠOVIĆ:P4853,p.15
GARIBOVIĆ	Šerifa			Female	REDACTED;
GARIBOVIĆ	Atif	Murat	03/05/1920	Male	REDACTED;
GARIBOVIĆ	Husein	Sulejman	30/12/1929	Male	REDACTED;
GARIBOVIĆ	Mina			Female	REDACTED;
HODŽIĆ	Fikret	Meho	26/06/1953	Male	REDACTED; KDZ611:P4101,p.9; A.MAŠOVIĆ:P4853,p.16
HUSKIĆ	Šuhra	Abid	06/05/1930	Female	A.MAŠOVIĆ:P4853,p.16
HUSKIĆ	Edhem	Sulejman	15/08/1929	Male	A.MAŠOVIĆ:P4853,p.16; see also P4888,p.3 and A.MAŠOVIĆ:4850,p.48
HUSKIĆ	Enver	Šero	16/05/1956	Male	A.MAŠOVIĆ:P4853,p.16; P4888,p.3 (FaN Šerif, DOB 06/05/1956); see also A.MAŠOVIĆ:4850,p.48
KENJAR	Munib	Mahmut	25/09/1944	Male	REDACTED; A.MAŠOVIĆ:P4853,p.20
MEDUNJANIN	Haris	Bećir	13/09/1970	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.23
MUJAGIĆ	Esad	Sadik	11/10/1954	Male	REDACTED; KDZ611:P4101,p.9; A.MAŠOVIĆ:P4853,p.15
MUJKANOVIĆ	Ismet			Male	REDACTED;
MUJKANOVIĆ	Mirsad			Male	REDACTED;
MUJKANOVIĆ	Rifet			Male	REDACTED;

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PIDIC	IBRAHIM	BIBO	10/12/1930	Male	REDACTED; A.MAŠOVIĆ:P4853.p.23
POLJAK	Ibro	Muharem	06/09/1940	Male	REDACTED; A.MAŠOVIĆ:P4853.p.23
Prijedor A.10.2					
DZOLIĆ	Sead			Male	REDACTED;
EJUPOVIĆ	DŽEVAD			Male	REDACTED; REDACTED;
HABIBOVIĆ	ALMIR	SULJO	05/02/1975	Male	REDACTED; A.MAŠOVIĆ:P4853.p.32 (DOB 1971); P4892,p.4; see also A.MAŠOVIĆ:P4850.p.49
ČAUŠEVIĆ	Mevla	Osman	01/01/1912	Female	REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
MEDIĆ	Damir	Idriz		Male	REDACTED;
MEDIĆ	Hasan	Adem	27/12/1935	Male	REDACTED; A.MAŠOVIĆ:P4853.p.32
MEDIĆ	Idriz			Male	REDACTED;
MUHIĆ	Mehmed	Safet	15/10/1959	Male	REDACTED; A.MAŠOVIĆ:P4853.p.32 (FN Mehmed)
MUJŽIĆ	Mehmed	Mahmut	01/02/1933	Male	REDACTED; A.MAŠOVIĆ:P4853.p.32
MUJŽIĆ	Mujo	Mustafa	18/06/1931	Male	REDACTED; A.MAŠOVIĆ:P4853.p.32
MUJŽIĆ	Ramiz	Muharem	21/09/1956	Male	REDACTED; A.MAŠOVIĆ:P4853.p.32
RIZVANČEVIĆ	Hasnija			Female	REDACTED; REDACTED;
Prijedor A.10.3					
ŠAHURIĆ	Šerića	Mujo	01/01/1936	Female	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
ŠAHURIĆ	Mehmed	Meho	03/02/1923	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
FORIĆ	Jusuf	Huso	22/10/1928	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
FORIĆ	Lutvija	Ibrahim	10/05/1913	Female	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
FORIĆ	Teufik	Juso	01/12/1940	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
JAKUPOVIĆ	Atif	Sulejman	03/08/1914	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
MUJANOVIĆ	Đemila	Adem	15/05/1920	Female	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.32
MUJKANOVIĆ	Derviš	Adem		Male	REDACTED; REDACTED;
MUJKANOVIĆ	Ibrahim	Adem	15/06/1928	Male	REDACTED; A.MAŠOVIĆ:P4853.p.32
MUJKANOVIĆ	Zlatka			Female	REDACTED;
POLJAK	Ibro			Male	REDACTED; REDACTED;
ZENKIĆ	Arif	Omer	08/03/1934	Male	REDACTED;
Prijedor A.10.4					
ELKASOVIĆ	Ilijaz	Zijad	01/01/1961	Male	S.ELKASOVIĆ:P690.p.10,15,20,27,32 (FN Ilijas); REDACTED; A.MAŠOVIĆ:P4853.p.18
ELKASOVIĆ	Osmo	Osman	01/09/1963	Male	REDACTED; A.MAŠOVIĆ:P4853.p.15 (FN Osme)
ELKASOVIĆ	OSMAN	SALJH	22/08/1932	Male	S.ELKASOVIĆ:P690.p.17-20; REDACTED; A.MAŠOVIĆ:P4853.p.32
ELKASOVIĆ	Sakib	Zijad	24/05/1968	Male	REDACTED; S.ELKASOVIĆ:P690.p.17-20; REDACTED; A.MAŠOVIĆ:P4853.p.15
ELKASEVIĆ	Ziad				REDACTED;

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FORIĆ	Alija	Kasim	01/07/1969	Male	REDACTED; A.MAŠOVIĆ:P4853.p.15
FORIĆ	Smail	Teufik	27/01/1968	Male	REDACTED; A.MAŠOVIĆ:P4853.p.16
JAKUPOVIĆ	Samed	Hase	03/10/1973	Male	REDACTED; A.MAŠOVIĆ:P4853.p.16
JAKUPOVIĆ	Zilhad	Osman	15/10/1963	Male	REDACTED; A.MAŠOVIĆ:P4853.p.16
JASKIĆ	Abaz	Meho	17/05/1942	Male	REDACTED; S.ELKASOVIĆ:P690.p.17-20; REDACTED; A.MAŠOVIĆ:P4853.p.16
JASKIĆ	Nijaz	Abaz	23/11/1963	Male	REDACTED; S.ELKASOVIĆ:P690.p.17-20; REDACTED; A.MAŠOVIĆ:P4853.p.16
JAVOR	Alija	Fate	12/04/1952	Male	REDACTED; S.ELKASOVIĆ:P690.p.17-20; REDACTED; A.MAŠOVIĆ:P4853.p.32
MAJĐANAC	Senad	Sefer	01/01/1964	Male	S.ELKASOVIĆ:P690.p.10,15,20,27,32; REDACTED; A.MAŠOVIĆ:P4853.p.21
TURKANOVIĆ	Fehim	Sefer	01/01/1962	Male	S.ELKASOVIĆ:P690.p.10,15,20,27,32; REDACTED; A.MAŠOVIĆ:P4853.p.23
Prijedor A.10.5					
ŽERIĆ	Azra				REDACTED;
BEHLIĆ	Aziz		11/06/1952		REDACTED; REDACTED;
DŽANANOVIĆ	Azema	Latif	10/02/1932	Female	REDACTED; A.MAŠOVIĆ:P4853.p.33
DŽANANOVIĆ	Vejsil	Jakup	02/02/1932	Male	REDACTED; A.MAŠOVIĆ:P4853.p.33
FERIZOVIĆ	Husein	Vehbija	01/01/1956	Male	REDACTED; A.MAŠOVIĆ:P4853.p.34
HOPOVAC	Adem	Karanfil	15/10/1924	Male	REDACTED; KDZ014:P674.p.20-21
HOPOVAC	FNU			Male	REDACTED;
HOPOVAC	Hamdija	Smail	05/08/1947	Male	REDACTED; A.MAŠOVIĆ:P4853.p.34
HOPOVAC	Huse	Husein	19/06/1944	Male	REDACTED; KDZ014:P674.p.23 (Huse); A.MAŠOVIĆ:P4853.p.34 (FN Huse)
HOPOVAC	Mirhad			Male	KDZ014:P674.p.24
HOPOVAC	Nedžad	Kemal	07/07/1972		REDACTED; A.MAŠOVIĆ:P4853.p.34
HOPOVAC	Ramiz	Kemal	22/04/1961		REDACTED; A.MAŠOVIĆ:P4853.p.34
HOPOVAC	Suad	Huso	07/02/1974	Male	REDACTED; KDZ014:P674.p.23 (FaN Huse); A.MAŠOVIĆ:P4853.p.34
HOPOVAC	Velid			Male	KDZ014:P674.p.23
HUJIĆ	Husein				REDACTED;
KARUPOVIĆ	Fehim	Muharem	17/08/1939	Male	REDACTED; KDZ014:P674.p.20
MALOVČIĆ	Fadil	Husein	10/03/1960	Male	REDACTED; KDZ014:P674.p.23
MUŠIĆ	Badema	Ibro	01/01/1942	Female	REDACTED; KDZ014:P674.p.28
OSMANČEVIĆ	Hasan				REDACTED;
OSMANČEVIĆ	FNU	Hasan			REDACTED; KDZ074:P711.p.12; REDACTED;
REDŽIĆ	Asim	Muharem	02/04/1939	Male	REDACTED; KDZ014:P674.p.22-23 ; A.MAŠOVIĆ:P4853.p.36

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REDŽIĆ	Ešef	Muharem	19/04/1955	Male	REDACTED; A.MAŠOVIĆ:P4850,para.111; A.MAŠOVIĆ:P4853, p.34 (DOB 1957); P4868
REDŽIĆ	Naila	Vejsil	20/08/1955	Female	REDACTED; A.MAŠOVIĆ:P4853, p.34
REDŽIĆ	Namir	Ešef	08/01/1989	Male	REDACTED; A.MAŠOVIĆ:P4853, p.34
REDŽIĆ	Nijaz			Male	KDZ014:P674,p.23
REDŽIĆ	Nizam	Mehmed	01/10/1973	Male	REDACTED; A.MAŠOVIĆ:P4853,p.34
REDŽIĆ	Rubija	Muharem	10/04/1936	Unknown	REDACTED; KDZ014:P674,p.19
REDŽIĆ	Sabahudin			Male	REDACTED;
REDŽIĆ	Vahid	Ešef	18/03/1985	Male	REDACTED; A.MAŠOVIĆ:P4853, p.34
REKIĆ	Ramiz	Redžo	09/06/1952	Male	A.MAŠOVIĆ:P4853, p.36
SALIHović	Huse	Hilimo	27/06/1963	Male	REDACTED; KDZ014:P674,p.28 ; A.MAŠOVIĆ:P4853, p.36
SIJEČIĆ	Husein	Husein	17/07/1937	Male	REDACTED; KDZ014:P674,p.16 (LN SIJAČIĆ)
SIJEČIĆ	Jasmin	Safet	14/06/1963	Male	REDACTED;
SIJERČIĆ	Ermin			Male	REDACTED; KDZ014:P674,p.28 (LN SIJAČIĆ)
SIMBEGOVIĆ	Hasib			Male	REDACTED; KDZ014:P674,p.35
Prijedor A.10.6					
ŠABANOVIĆ	Ferid	Bego	24/01/1967	Male	REDACTED; KDZ038:P676,p.12-13 ; N.SEBIRE:P646 p.249; A.MAŠOVIĆ:P4853, p.36 (DOB 1966)
ŠVRAKA	Muharem			Male	REDACTED;
ALAGIĆ	Fikret	Jusuf	06/05/1967	Male	REDACTED; REDACTED; P587
AVDIĆ	Esef			Unknown	REDACTED; REDACTED; P587 ("Eka", FN may be Esef)
AVDIĆ	Muhamed	Hamed	28/05/1975	Male	REDACTED; REDACTED; P587
DŽOLIĆ	Besim	Ahmet	28/10/1960	Male	REDACTED; REDACTED; P587
DEDIĆ	FNU	Rifat		Unknown	P587; A.MAŠOVIĆ:P4853,p.34 (FN Nermin)
DEDIĆ	Rifat	Mustafa	17/10/1942	Male	REDACTED; P587
DIZDAREVIĆ	Nazif	Salih	08/11/1908	Male	REDACTED; KDZ014:P674,p.29; A.MAŠOVIĆ:P4853,p.34
DURATOVIĆ	Đula	Ibrahim	15/10/1924	Female	REDACTED; REDACTED; P587
DURATOVIĆ	Ešef	Husnija	07/09/1959	Male	REDACTED; REDACTED; P587
DURATOVIĆ	Ekrem			Male	REDACTED;
DURATOVIĆ	Hazim	Husnija	16/01/1964	Male	REDACTED; REDACTED; P587
DURATOVIĆ	Husnija	Avdo	10/02/1927	Male	REDACTED; REDACTED; P587
DURATOVIĆ	Ismet	Husnija	11/11/1949	Male	REDACTED; REDACTED; P587
DURATOVIĆ	Ismet			Male	REDACTED; P587
DURATOVIĆ	Mehmed	Husnija	01/09/1952	Male	REDACTED; REDACTED; P587
DURATOVIĆ	Mithet	Ismet	15/01/1959	Male	REDACTED; REDACTED; P587 ("Bita" or "Mita")
DURATOVIĆ	Zemira	Resid Okic	13/10/1965	Female	REDACTED; REDACTED; P587
DURATOVIĆ	Zlatan	Ismet	21/04/1965	Male	REDACTED; REDACTED; P587
EJUPOVIĆ	Irfan	Serif/Mejra	05/04/1964	Male	REDACTED; REDACTED; REDACTED;

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EJUPOVIĆ	Nedžad	Serif/Mejra	11/01/1959	Male	REDACTED; REDACTED; REDACTED;
FIKIĆ	Hamdija			Male	REDACTED; KDZ038:P676.p.12-13
HADŽIĆ	HUSNIJA	DEDO	30/03/1927	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.19; P4892.p.2; see also A.MAŠOVIĆ:P4850.p.49
HADŽIĆ	Muhamed	Meho	25/04/1967	Male	REDACTED; REDACTED;
HADŽIĆ	Smajil				REDACTED;
HEGIĆ	Hadžalija	Mustafa	10/02/1936	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.19
HEGIĆ	Hasan	Husein	10/02/1938	Male	REDACTED;
HEGIĆ	Husein	Osman	10/01/1954	Male	REDACTED;
HEGIĆ	Ismet	Salih	25/03/1954	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.19
HEGIĆ	Mujo	Smajo	10/01/1949	Male	REDACTED;
HEGIĆ	Salih	Salko	06/12/1928	Male	REDACTED; REDACTED;
HOPOVAC	Nijaz		30/01/1966		REDACTED; KDZ014:P674.p.23
HOPOVAC	FNU				REDACTED;
KADIĆ	Abdulah	Avdija	12/03/1941	Male	REDACTED;
KADIĆ	Amir	Mehmed	01/11/1968	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Bego	Huso	05/07/1952	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Enes	Ramo	17/03/1962	Male	REDACTED;
KADIĆ	Ferid	Omer	06/01/1953	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Hajdar			Male	REDACTED;
KADIĆ	Hamzalija	Omer	14/03/1939	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Huse	Meho	04/11/1920	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Kemal			Male	REDACTED; P587
KADIĆ	Mehmed	Meho	22/05/1928	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Mirzet	Alija	01/01/1959	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Mujaga	Mujo	22/09/1952	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Mujo	Agan	15/04/1915	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Sead	Rizah	22/01/1959	Male	REDACTED; A.MAŠOVIĆ:P4853.p.34
KADIĆ	Sead	Mujo	11/06/1960	Male	REDACTED; P587; REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIĆ	Sulejman	Omer	01/02/1949	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIRIĆ	Šaban	Šaban	22/03/1956	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIRIĆ	Šerif	Ibrahim	10/03/1947	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIRIĆ	Agan	Rasim	04/04/1968	Male	REDACTED;
KADIRIĆ	Avdo	Hasan	07/03/1948	Male	REDACTED;
KADIRIĆ	Edhem				REDACTED;
KADIRIĆ	Emdžad	Dževad	08/07/1973	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIRIĆ	Emsud	Safet	03/05/1954	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36
KADIRIĆ	Enes	Safet	12/04/1965	Male	REDACTED; A.MAŠOVIĆ:P4853.p.36

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
KADIRIĆ	Ermin	Hasan	01/01/1970	Male	REDACTED;
KADIRIĆ	Hasan	Šerif	15/03/1937	Male	REDACTED; A.MAŠOVIĆ:P4853,p.36
KADIRIĆ	Husein	Huso	13/01/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.37
KADIRIĆ	Mirsad	Idriz	08/02/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.36
KADIRIĆ	Nihad		10/08/1964	Male	REDACTED;
KADIRIĆ	Omer	Dervis	12/09/1930	Male	REDACTED; A.MAŠOVIĆ:P4853,p.36
KADIRIĆ	Rašid	Bajro	17/02/1935	Male	REDACTED;
KADIRIĆ	Rasim	Derviš	31/08/1951	Male	REDACTED;
KADIRIĆ	Safet	Redžo	06/03/1930	Male	REDACTED; A.MAŠOVIĆ:P4853,p.36
KADIRIĆ	Salih	Mujo	14/04/1915	Male	REDACTED;
KADIRIĆ	Samir	Izet	13/06/1969	Male	REDACTED;
KARAGIĆ	Derviš				REDACTED;
KARAGIĆ	Fikret	Šefik	01/01/1962	Male	REDACTED;
KARAGIĆ	Hamzo (Hamzalija)		25/09/1945	Male	REDACTED; REDACTED; P587
KARAGIĆ	Ifet	Ismet	06/06/1968	Male	REDACTED;
KARAGIĆ	Munib	Edhem	20/11/1943	Male	REDACTED; REDACTED; P587
KARAGIĆ	Saša			Male	REDACTED; KDZ038:P676,pp.13-14
KARAGIĆ	Salih	Rasim	16/06/1969	Male	REDACTED;
KARAGIĆ	Salvo	Šefik	01/10/1958	Male	REDACTED;
KARAGIĆ	Samir	Hamzalija	26/04/1972	Male	REDACTED;
KARAGIĆ	Saud	Munib	08/06/1970	Male	REDACTED; REDACTED; P587
KARAGIĆ	Seno			Male	REDACTED; REDACTED; P587
KARAGIĆ	Suad	Sulejman	20/04/1963	Male	REDACTED; P587; A.MAŠOVIĆ:P4853,p.37
KEKIĆ	Asmir			Male	KDZ038:P676,p.21
KEKIĆ	Emsud	Hamdija	25/07/1959	Male	REDACTED; A.MAŠOVIĆ:P4853,p.37
KEKIĆ	Halid	Hadžo	09/11/1952	Male	REDACTED; KDZ038:P676,p.21; REDACTED; P587
KEKIĆ	Nurija	Hadžo	10/06/1946	Male	REDACTED; KDZ038:P676,p.21; REDACTED; P587
KEKIĆ	Sabahudin		20/10/1970	Male	REDACTED; KDZ038:P676,p.21
MEDIĆ	Mirsad	Esad	15/05/1954	Male	REDACTED; KDZ038:P676,pp.13-14
MRKALJ	Elvedin	Ishak	22/03/1963	Male	REDACTED;
MRKALJ	Emsud	Kasim	05/08/1960	Male	REDACTED; REDACTED; P587
MRKALJ	Idriz			Male	P587
MRKALJ	Ifet	Abdulah	09/02/1948	Male	REDACTED; A.MAŠOVIĆ:P4853, p.36
MRKALJ	Isak		24/02/1934	Male	REDACTED;
MRKALJ	Kasim	Hamza	29/06/1930	Male	REDACTED; REDACTED; P587
MRKALJ	Latif	Hamza	04/06/1938	Male	REDACTED;
MRKALJ	Mirhad	Kasim	01/03/1958	Male	REDACTED; KDZ038:P676,p.12-13; REDACTED; P587
MRKALJ	Smajil	Malic	16/03/1933	Male	REDACTED;

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
NASIĆ	Uzeir			Male	E.NASIĆ:P696,pp.39,49; P697,p.2
PELAK	MUHAREM	AVDIJA	20/07/1952	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.22
RIZVANOVIĆ	Ferid			Male	KDZ038:P676,p.21
RIZVANOVIĆ	Hasan	Ibrahim	02/04/1935	Male	A.MAŠOVIĆ:P4853,p.37
RIZVANOVIĆ	Haso	Hamid	26/03/1950	Male	A.MAŠOVIĆ:P4853,p.37 (FN Hase)
TEDIĆ	Muhamed			Male	KDZ038:P676,p.21
TREPIĆ	Husein	Safet	03/02/1942	Male	REDACTED;
VOJNIKOVIĆ	Elvir	Muharem	13/11/1972	Male	REDACTED; KDZ038:P676,p.21 ; A.MAŠOVIĆ:P4853,p.37
VOJNIKOVIĆ	Ziyad			Male	P587
Prijedor A.10.7					
ČANČAR	Suvad	Adem	14/07/1957	Male	A.MAŠOVIĆ:P4853,p.34
DEDIĆ	Emsud	Kasim	16/02/1956	Male	REDACTED; A.MAŠOVIĆ:P4853,p.34
DEDIĆ	Samir	Said	18/02/1969	Male	REDACTED; A.MAŠOVIĆ:P4853,p.34
DURATOVIĆ	Ekrem	Rifet	29/01/1949	Male	REDACTED; N.SEBIRE:P694,p.28; A.MAŠOVIĆ:P4853,p.34
FATIMIĆ	Edin	Ilijaz	17/10/1969	Male	REDACTED; A.MAŠOVIĆ:P4853,p.35
FIKIĆ	Reuf	Ramo	14/07/1971	Male	REDACTED; E.NASIĆ:P696,p.30; E.NASIĆ:P697,p.5
HAMULIĆ	FNU			Unknown	E.NASIĆ:P696,p.31
HEGIĆ	Besim	Hasan	14/11/1950	Male	REDACTED; E.NASIĆ:P696,p.30-31; E.NASIĆ:P697,p.5 ; A.MAŠOVIĆ:P4853,p.35
HOPOVAC	Islam	Đemal	02/03/1956	Male	REDACTED; N.SEBIRE:P694,p.26; N.KARAGIĆ:P651,pp.25,46-49; E.NASIĆ:P696,p.30; E.NASIĆ:P697,p.5 ; A.MAŠOVIĆ:P4853,p.35
JAMASTAGIĆ	FNU			Unknown	E.NASIĆ:P696,p.31
JUJIĆ	Hasan	Sefer	23/03/1962	Male	A.MAŠOVIĆ:P4853,p.35
KADIĆ	Armin	Rizah	01/03/1963	Male	REDACTED; N.SEBIRE:P694,p.27; A.MAŠOVIĆ:P4853,p.35
KADIĆ	Edin	Dževad	27/09/1974	Male	REDACTED; N.SEBIRE:P694,p.27
KADIĆ	Elvis	Ferid	15/01/1977	Male	REDACTED; A.MAŠOVIĆ:P4853,p.35
KADIĆ	Vahidin	Dževad	11/10/1970	Male	REDACTED; N.SEBIRE:P694,p.27; A.MAŠOVIĆ:P4853,p.35
KADIĆ	Zejinil	Mehmedalija	23/12/1973	Male	REDACTED; A.MAŠOVIĆ:P4853,p.35
KADIRIĆ	Šabahudin	Redžep	01/01/1972	Male	REDACTED; P4415 (DOB 13/07/1972); E.NASIĆ:P696,p.31 (FNU); E.NASIĆ:P697,p.5 (FNU); A.MAŠOVIĆ:P4853,p.35
KADIRIĆ	Hilimija	Jasim	01/01/1963	Male	REDACTED; N.SEBIRE:P694,p.27; A.MAŠOVIĆ:P4853,p.35
KARAGIĆ	Ferid	Salih	06/05/1949	Male	REDACTED; P694,p.27; N.KARAGIĆ:P651,pp.37-38,46-48 (Father of Nermin KARAGIĆ); A.MAŠOVIĆ:P4853,p.35
KEKIĆ	Asmir			Male	REDACTED; N.SEBIRE:P694,p.27
KEKIĆ	Esad	Hakija	03/03/1942	Male	REDACTED; N.SEBIRE:P694,p.27; A.MAŠOVIĆ:P4853,p.35
KEKIĆ	Jasmir	Hamdija	27/08/1973	Male	REDACTED; A.MAŠOVIĆ:P4853,p.35

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KEKIĆ	Nurudin	Faik	21/07/1971	Male	REDACTED; N.SEBIRE:P694,p.27; E.NASIC:P696,p.31 (FNU, DOB 1971); E.NASIC:P697,p.5 (FNU, DOB 1971); A.MAŠOVIĆ:P4853,p.35
KEKIĆ	Ramo	Avdija	27/06/1950	Male	REDACTED; A.MAŠOVIĆ:P4853,p.35
KEKIĆ	Senad	Sadik	01/03/1966	Male	REDACTED; A.MAŠOVIĆ:P4853,p.35
KEKIĆ	Suvad	Sadik	15/12/1963	Male	REDACTED;
MEDIĆ	Rašid		01/01/1971	Male	REDACTED; E.NASIC:P696,p.30; E.NASIC:P697,p.5
MUHIĆ	Abdulah			Unknown	E.NASIC:P696,pp.30-31 ; A.MAŠOVIĆ:P4853,p.35 (FN Abdulah)
MULALIĆ	Suad	Adem	19/06/1962	Male	REDACTED; E.NASIC:P696,p.30; E.NASIC:P697,p.5 ; A.MAŠOVIĆ:P4853,p.35
MUSIĆ	Muho	Derviš	30/07/1954	Male	REDACTED; A.MAŠOVIĆ:P4853,p.35
SUJEČIĆ	Edin	Đemal	05/08/1974	Male	REDACTED; A.MAŠOVIĆ:P4853,p.36
Prijedor A.10.8					
AVDIĆ	Ismet	Muharem	16/05/1967	Male	N.KARAGIĆ:P65 I,pp.32-33; A.MAŠOVIĆ:P4853,p.34
KARAGIĆ	Mustafa	Mehmed	13/01/1966	Male	REDACTED;
NASIĆ	Irfan	Mehmed	01/01/1967	Male	REDACTED; E.NASIC:P696,p.19; E.NASIC:P697,pp.4,9,22-25
PETROVAC	Muharem	Osman	04/05/1962	Male	REDACTED; E.NASIC:P697,pp.4,9,23-25 ; A.MAŠOVIĆ:P4853,p.35
Prijedor A.10.9					
ŠVRAKA	Mirsad	Omer	01/01/1978	Male	REDACTED; I.ATLIJA:P3672,p.69 ; A.MAŠOVIĆ:P4853,p.39 (DOB 1975)
ATLIJA	Ilija	Lovro	01/01/1929	Male	I.ATLIJA:P3672,pp.36,56,65; I.ATLIJA:T.20313 ; A.MAŠOVIĆ:P4853,p.40
ATLIJA	Joso	Ilija	01/01/1935	Male	A.MAŠOVIĆ:P4853,p.40
BUJADILLOVIĆ	Katarina	Ivo	28/11/1943	Female	P3673; A.MAŠOVIĆ:P4853,p.44
BUJADILLOVIĆ	Markica	Pejo	29/03/1941	Male	P3673; A.MAŠOVIĆ:P4853,p.44 (FN Marko)
BUZUK	Ivica		01/01/1927	Male	I.ATLIJA:P3672,p.63; I.ATLIJA:T.20312
BUZUK	Mato	Vinko	27/01/1930	Male	I.ATLIJA:T.20312 (FN Mate); P3673; A.MAŠOVIĆ:P4853,p.44
BUZUK	Marija	Ivo	31/03/1929	Female	P3673; A.MAŠOVIĆ:P4853,p.44
BUZUK	Marko	Franjo	01/01/1932	Male	I.ATLIJA:P3672,p.65; A.MAŠOVIĆ:P4853,p.39 (DOB 1936)
BUZUK	Milan	Marko	12/04/1963	Male	I.ATLIJA:P3672,pp.63-64; I.ATLIJA:T.20312 ; A.MAŠOVIĆ:P4853,p.39
BUZUK	Miroslav	Mato	01/01/1960	Male	I.ATLIJA:T.20313; A.MAŠOVIĆ:P4853,p.39
BUZUK	Srećo	Franjo	26/05/1947	Male	I.ATLIJA:P3672,p.64; A.MAŠOVIĆ:P4853,p.39
BUZUK	Vlatko	Mato	01/01/1942	Male	I.ATLIJA:P3672,p.64; A.MAŠOVIĆ:P4853,p.39 (DOB 1965)
DIMAČ	Pero	Juro	02/12/1927	Male	I.ATLIJA:P3672,pp.36-38,56,65; I.ATLIJA:T.20313,20359
DIMAČ	Stipan	Ivan	12/04/1911	Male	I.ATLIJA:P3672,pp.60-61 (FN Stipo); A.MAŠOVIĆ:P4853,p.39 (FaN Ivo)

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DOŠEN	Luka	Mijo	16/10/1920	Male	P3673; A.MAŠOVIĆ:P4853,p.44
IVANDIĆ	Danica	Marko	01/01/1936	Female	I.ATLIJA:T.20315 ; A.MAŠOVIĆ:P4853,p.40
IVANDIĆ	FNU	Srećo		Unknown	A.MAŠOVIĆ:P4853,p.40 (FN Darko, DOB 1972)
IVANDIĆ	FNU	Srećo		Male	A.MAŠOVIĆ:P4853,p.40 (FN Miro DOB 1967)
IVANDIĆ	Jerko	Mato	01/01/1957	Male	I.ATLIJA:P3672,p.63; I.ATLIJA:T.20311 ; A.MAŠOVIĆ:P4853,p.40
IVANDIĆ	Mara	Marko	01/01/1933	Female	I.ATLIJA:T.20315 ; A.MAŠOVIĆ:P4853,p.40
IVANDIĆ	Milan	Ivo	01/01/1953	Male	I.ATLIJA:P3672,p.63; I.ATLIJA:T.20311,20355; A.MAŠOVIĆ:P4853,p.40
IVANDIĆ	Pejo	Ivo	01/01/1954	Male	I.ATLIJA:P3672,p.63; I.ATLIJA:T.20311 ; A.MAŠOVIĆ:P4853,p.39
IVANDIĆ	Srećo	Marko	01/01/1936	Male	I.ATLIJA:T.20315 (FN Sreto); A.MAŠOVIĆ:P4853,p.40
IVANDIĆ	Stipo	Ivo	01/01/1959	Male	I.ATLIJA:P3672,p.63,67; I.ATLIJA:T.20311-20312; A.MAŠOVIĆ:P4853,p.40
JAKARA	Jozo	Anto	01/01/1927	Male	I.ATLIJA:P3672,pp.66,83-84 ; A.MAŠOVIĆ:P4853,p.40
KOMLJEN	Ante	Luka	26/11/1956	Male	I.ATLIJA:T.20316 (son of Luka); A.MAŠOVIĆ:P4853,p.40
KOMLJEN	Ivo	Luka	01/01/1954	Male	I.ATLIJA:P3672,p.68; I.ATLIJA:T.20316 ; A.MAŠOVIĆ:P4853,p.40
KOMLJEN	Kaja (Wife of Ante)			Female	I.ATLIJA:P3672,p.68; I.ATLIJA:T.20316,20363 ; A.MAŠOVIĆ:P4853,p.40 (FN Kata)
KOMLJEN	Kaja (Wife of Joso)			Female	A.MAŠOVIĆ:P4853,p.40 (FN Kata)
KOMLJEN	Luka	Ivo	01/01/1926	Male	I.ATLIJA:P3672,p.68; I.ATLIJA:T.20316 ; A.MAŠOVIĆ:P4853,p.40
LOVRIĆ	Anto	Stipo	06/03/1943	Male	I.ATLIJA:P3672,p.84 (FN Ante); P3673; A.MAŠOVIĆ:P4853,p.44;
LOVRIĆ	Ivo	Joso	01/01/1934	Male	I.ATLIJA:P3672,p.64; A.MAŠOVIĆ:P4853,p.39
LOVRIĆ	Jozo	Addelko	01/01/1957	Male	I.ATLIJA:P3672,p.62 (FN Joso); A.MAŠOVIĆ:P4853,p.39
MARIJAN	Franjo	Joso	31/10/1927	Male	I.ATLIJA:P3672,p.60 ; A.MAŠOVIĆ:P4853,p.39
MARIJAN	Ivo			Male	I.ATLIJA:T.20317
MARIJAN	Mara	Lovro	15/05/1936	Female	I.ATLIJA:P3672,p.60 ; A.MAŠOVIĆ:P4853,p.39
MARIJAN	Zvonko	Joso	01/01/1952	Male	A.MAŠOVIĆ:P4853,p.40
MATANOVIĆ	Ante	Joso	01/01/1935	Male	I.ATLIJA:P3672,pp.65-66; I.ATLIJA:T.20313-20314; P3673; A.MAŠOVIĆ:P4853,p.40
MATANOVIĆ	Ervin	Mladen	29/03/1976	Male	P3673; A.MAŠOVIĆ:P4853,p.44
MATANOVIĆ	Fabijan	Pejo	30/10/1952	Male	P3673; A.MAŠOVIĆ:P4853,p.44
MATANOVIĆ	Goran	Ante	19/10/1973	Male	P3673; A.MAŠOVIĆ:P4853,p.44
MATANOVIĆ	Johan	Mladen	27/04/1974	Male	P3673; A.MAŠOVIĆ:P4853,p.44
MATANOVIĆ	Mladen	Pejo	01/01/1937	Male	P3673; A.MAŠOVIĆ:P4853,p.44;
MATANOVIĆ	Predrag	Pejo	01/01/1974	Male	P3673; A.MAŠOVIĆ:P4853,p.44
MATANOVIĆ	Zdravko	Ante	27/08/1962	Male	P3673; A.MAŠOVIĆ:P4853,p.44 (FaN Anto)
MATANOVIĆ	Zoran	Ante	25/04/1974	Male	P3673; A.MAŠOVIĆ:P4853,p.44 (FaN Anto, DOB 1975)
MLINAR	Ivica	Ivo	01/01/1930	Male	I.ATLIJA:P3672,p.63; I.ATLIJA:T.20311 ; A.MAŠOVIĆ:P4853,p.39 (FN Ivo)

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MLINAR	Luka	Mato	01/01/1978	Male	I.ATLIJA:P3672,pp.62-63,69; I.ATLIJA:T.20311 ; A.MAŠOVIĆ:P4853,p.40 (DOB 1976)
MLINAR	Mara	Pejo	13/01/1916	Female	I.ATLIJA:P3672,p.69 ; A.MAŠOVIĆ:P4853,p.39
Sanski Most A.12.1					
ŠLJIVAR	Rešid	Daut	18/05/1929	Male	REDACTED; P4901,p.12; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Daut	Muhamed	15/10/1921	Male	REDACTED; P557,p.2 ; P4901,p.21; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
BEGIĆ	ELMEDIN	Safet	22/06/1973	Male	R.BEGIĆ:P692,p.16; R.BEGIĆ:P691,pp.22,31; A.MAŠOVIĆ:P4853,p.44; see also P4901 and A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Fuad	Muhamed	30/07/1964	Male	REDACTED; P557,p.3 (DOB 1954); R.BEGIĆ:P692,p.16; R.BEGIĆ:P691,p.22; P4901,p.21; A.MAŠOVIĆ:P4853,p.44; see also A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Hakija	Haso		Unknown	REDACTED; R.BEGIĆ:P692,p.16; R.BEGIĆ:P691,p.22; P4901,p.21; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Irfan	Mustafa	13/03/1966	Male	REDACTED; P557,p.4; R.BEGIĆ:P692,pp.6,16,17; R.BEGIĆ:P691,p.25; P4901,p.5; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Muhamed	Latif	07/06/1923	Male	R.BEGIĆ:P692,p.16; R.BEGIĆ:P691,p.22; A.MAŠOVIĆ:P4853,p.45; see also P4901 and A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Muharem	Hakija	29/01/1968	Male	R.BEGIĆ:P692,p.16; R.BEGIĆ:P691,p.22; A.MAŠOVIĆ:P4853,p.45; see also P4901 and A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Munib	Began	22/11/1965	Male	R.BEGIĆ:P692,pp.6,16,18; R.BEGIĆ:P691,pp.22,29; P557,p.3; A.MAŠOVIĆ:P4853,p.45; see also P4901 and A.MAŠOVIĆ:P4850,p.52
BEGIĆ	NAJIL	LATIF	11/09/1929	Male	R.BEGIĆ:P692,p.16; R.BEGIĆ:P691,p.22; P4870; P4871; A.MAŠOVIĆ:P4853,p.45; see also P4901 and A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Nedžad	Ševkija	22/09/1973	Male	R.BEGIĆ:P692,pp.6,16; R.BEGIĆ:P691,pp.22,33; A.MAŠOVIĆ:P4853,p.45; see also P4901 and A.MAŠOVIĆ:P4850,p.52
BEGIĆ	Šaćir				R.BEGIĆ:P692,pp.16,19; R.BEGIĆ:P691,p.22
BEGIĆ	Safet				R.BEGIĆ:P691,p.22
CERIĆ	Enes			Male	R.BEGIĆ:P692,pp.6,16; R.BEGIĆ:P691,pp.22,23

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CERić	Midhat	Miralem	01/01/1956	Male	R.BEGić:P692,pp.6,16,18 (FN Midhet); R.BEGić:P691,pp.22,28-29
CERić	Miralem	Dedo	27/03/1928	Male	REDACTED; R.BEGić:P692,pp.6,16; R.BEGić:P691,pp.22,23; P4901,p.21; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
DIZDAREVIĆ	Enes	Ismet	07/07/1976	Male	R.BEGić:P692,pp.6,16; R.BEGić:P691,pp.22,30; A.MAŠOVIĆ:P4853,p.45; see also P4901 and A.MAŠOVIĆ:P4850,p.52
DIZDAREVIĆ	Ismet	Husein	01/07/1939	Male	REDACTED; R.BEGić:P692,p.16; R.BEGić:P691,p.22; P4901,p.21; A.MAŠOVIĆ:P4853,p.45 (FaN Huso); see also A.MAŠOVIĆ:P4850,p.52
DIZDAREVIĆ	Mirsad	Ismet	24/06/1974	Male	REDACTED; R.BEGić:P692,pp.6,16,18; R.BEGić:P691,pp.22,30; P4901,p.21; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
DIZDAREVIĆ	Muhamed	Ismet	23/01/1969	Male	REDACTED; P557,p.3 (DOB 1968); R.BEGić:P692,p.16; R.BEGić:P691,p.22; P4901,p.9; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
HANDANOVIĆ	Esad	Redžo	17/07/1939	Male	REDACTED; P4901,pp.16-17; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
HANDANOVIĆ	Ibrahim	Hasan	03/03/1930	Male	REDACTED; P4901,p.21; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
KADIRIĆ	Hasib	Ibro	17/02/1924	Male	REDACTED; P4901,p.20; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
KLJAJIĆ	Hasib	Hamid	03/03/1928	Male	REDACTED; P4901,p.16; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
KLJAJIĆ	Mumin	Omer	08/12/1906	Male	REDACTED; P4901,p.11; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
KLJAJIĆ	Safet	Mumin	03/05/1939	Male	REDACTED; P4901,p.13; A.MAŠOVIĆ:P4853,p.45; see also A.MAŠOVIĆ:P4850,p.52
KURBEGOVIĆ	Ismet		12/10/1954	Male	REDACTED; R.BEGić:P692,pp.6,16; R.BEGić:P691,pp.22,24
Sanski Most A.12.2					
BEKTAŠEVIĆ	Husein	Hasan	01/01/1966	Male	REDACTED; A.MAŠOVIĆ:P4853,p.45; P4898,p.10 (DOB 1946); see also A.MAŠOVIĆ:P4850,p.51
BRKOVIĆ	Namka	Husein	01/01/1975	Female	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45; P4898,pp.9-10; see also A.MAŠOVIĆ:P4850,p.51
HANDANOVIĆ	Emir		01/01/1973	Male	P3637,p.6; A.MAŠOVIĆ:P4853,p.47; P4898,pp.36-37; see also A.MAŠOVIĆ:P4850,p.51

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
HUKANOVIĆ	Hasan	Omer	01/01/1927		REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45; P4898,pp.17-18; see also A.MAŠOVIĆ:P4850,p.51
JELEČEVIĆ	Asim	Sefer	18/07/1978	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.45; P4894,p.10; see also A.MAŠOVIĆ:P4850,P.50
JELEČEVIĆ	Elvira	Fadil	01/03/1974	Female	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.45; P4894,p.10; see also A.MAŠOVIĆ:P4850,P.50
JELEČEVIĆ	Emin	Junuz	01/01/1933	Male	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45 (FN Emir); P4898,p.12 (DOB 15/09/1933); see also A.MAŠOVIĆ:P4850,p.51
KADIRIĆ	Idriz	Mustafa	01/01/1973	Male	REDACTED; P3637,p.6 (LN KADRIĆ); A.MAŠOVIĆ:P4853,p.45; P4898,pp.15-16; see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Aldina	Rufad	01/01/1984	Female	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45; P4898,pp.7-8; see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Almina	Ismet	22/09/1985	Female	REDACTED; KDZ097:P715,p.5 (FN Almadina); P3637,p.6; A.MAŠOVIĆ:P4853,p.45; P4898,p.6; see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Asim	Rufad	01/01/1988	Male	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45; P4898,p.13; see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Džehva	Redžo	01/01/1969	Female	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45; P4898,pp.19-20; see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Dursum	Biba	01/01/1961	Male	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45 (FaN Bibo, DOB 1965); P4898,pp.18-19 (FaN Bibo); see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Edin	Suad	01/01/1986	Male	REDACTED; P3637,p.6
KERANOVIĆ	Fatima	Ibrahim	01/01/1941	Female	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.45; P4898,pp.5-6; see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Jasima	Smail	01/01/1971	Female	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.46; P4898,pp.10-11 (FaN Smailo); see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Muharema	Husein	05/02/1962	Female	REDACTED; REDACTED; REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.46; P4898,pp.4-5 (DOB 1969); see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Nahid	Hasan	01/01/1977	Male	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.46; P4898,p.15 (DOB 25/02/1977); see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Nira	Aziz	01/01/1964	Female	REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.46 (FaN Aziza); P4898,p.7 (FN Mira); see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Sabina	Ismet	09/01/1990	Female	REDACTED; REDACTED; REDACTED; P3637,p.6; A.MAŠOVIĆ:P4853,p.46; P4898,pp.14-15; see also A.MAŠOVIĆ:P4850,p.51
KERANOVIĆ	Sejida	Omer	06/10/1963	Female	REDACTED; P3637,p.6

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
KERANOVIĆ	Smail	Osman	01/01/1936	Male	REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46 (FaN Osme, DOB 1926); P4898,pp.3-4 (DOB 1926); see also A.MAŠOVIĆ:P4850,p.51
MEHMEDOVIĆ	HIZA	ADIL	20/07/1932	Female	REDACTED; REDACTED; P3637.p.8; A.MAŠOVIĆ:P4853,p.47
MERDANOVIĆ	Besima	Taib	01/03/1961	Female	REDACTED; REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,p.9; see also A.MAŠOVIĆ:P4850,p.51
MERDANOVIĆ	EDITA	MUSTAFA	01/01/1991	Female	REDACTED; REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,pp.8-9 (DOB 01/12/1991); see also A.MAŠOVIĆ:P4850,p.51
MERDANOVIĆ	Husein		01/01/1987	Male	REDACTED;
MERDANOVIĆ	HUSEIN	MUSTAFA	01/02/1935	Male	REDACTED; REDACTED; REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,p.8; see also A.MAŠOVIĆ:P4850,p.51
MERDANOVIĆ	Jasmin	Ibrahim	04/12/1989	Male	REDACTED; A.MAŠOVIĆ:P4853,p.46; see also P4898 and A.MAŠOVIĆ:P4850,p.51
MERDANOVIĆ	Jasmina		01/05/1992	Female	REDACTED;
MERDANOVIĆ	Sabra	Junuz	29/11/1959	Female	REDACTED; REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,p.11; see also A.MAŠOVIĆ:P4850,p.51
MERDANOVIĆ	Sanida	Omer	01/01/1963		REDACTED; A.MAŠOVIĆ:P4853,p.46 (FN Seida); P4898,pp.16-17 (FN Seida); see also A.MAŠOVIĆ:P4850,p.51
MERDANOVIĆ	Zumra	Huso	01/01/1902	Female	REDACTED; REDACTED; P3637.p.6 (FN Zumrka); A.MAŠOVIĆ:P4853,p.46; P4898,p.19; see also A.MAŠOVIĆ:P4850,p.51
OMANOVIĆ	Đemka	Sadik	01/01/1934	Female	REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,p.4; see also A.MAŠOVIĆ:P4850,p.51
OMANOVIĆ	Emina	Meho	01/01/1942	Female	REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,pp.6-7; see also A.MAŠOVIĆ:P4850,p.51
ZUKIĆ	Arifa	Džebo	01/01/1937	Female	REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,pp.12-13; see also A.MAŠOVIĆ:P4850,p.51
ZUKIĆ	Fatima	Smail	11/11/1941	Female	REDACTED; REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46; P4898,pp.11-12; see also A.MAŠOVIĆ:P4850,p.51
ZUKIĆ	Smaila	Smajo		Female	REDACTED; P3637.p.6; A.MAŠOVIĆ:P4853,p.46 (FN Smajila, FaN Huso); P4898,pp.13-14; see also A.MAŠOVIĆ:P4850,p.51
Sanski Most A.12.3					
ALIBABIĆ	SAHID	HUSEIN	29/12/1928	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898,p.41/P3374,p.1 (partial duplicates); A.MAŠOVIĆ:P4853,p.46; see also A.MAŠOVIĆ:P4850,p.51
JAMAKOVIĆ	VAHID	Derviš	01/01/1936	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898,p.41/P3374,p.1 (partial duplicates); A.MAŠOVIĆ:P4853,p.46 (DOB 1930); see also A.MAŠOVIĆ:P4850,p.51

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
KALABIC	TEHVID	SAFET	31/01/1975	Male	REDACTED; REDACTED; P3637.p.7 (FN Tehvid) (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates)(FN Tehvid); A.MAŠOVIĆ:P4853.p.46; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	ASIM	SAFET	21/08/1953	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.46; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	DŽEVAD	HUSO	01/01/1962	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.46 (DOB 1961); see also A.MAŠOVIĆ:P4850.p.51
KENJAR	HASAN	HASO	24/10/1933	Male	REDACTED; P3637.p.7; A.MAŠOVIĆ:P4853.p.46; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	HASAN	HASAN	17/05/1944	Male	REDACTED; P3637.p.7 (FaN Husein); A.MAŠOVIĆ:P4853.p.46; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	Hasan	Bejdo	16/05/1919	Male	P3637.p.7 (FN Husein, FaN Meho); A.MAŠOVIĆ:P4853.p.40
KENJAR	HUSEIN	HASAN	19/10/1975	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.46; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	ILIJAZ	HASAN	01/10/1958	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.46; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	IRFAN	SMAIL	22/08/1975	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.47; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	MEHMED	SAFET	10/06/1958	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates)(FN Meho); A.MAŠOVIĆ:P4853.p.47; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	MIDHAT	SAFET	05/02/1962	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates)(FN Midhet); A.MAŠOVIĆ:P4853.p.47 (Midhet); see also A.MAŠOVIĆ:P4850.p.51
KENJAR	MUHAMED	NASIF	23/11/1931	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.47; see also A.MAŠOVIĆ:P4850.p.51
KENJAR	MUHAMED	HUSEIN	24/02/1968	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.47); see also A.MAŠOVIĆ:P4850.p.51

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
KENJAR	NEDŽAD	HUSO	26/10/1973	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.47; see also A.MAŠOVIĆ:P4850.p.51
ZUKIĆ	IZET	ISMET	29/04/1971	Male	REDACTED; REDACTED; P3637.p.7 (FN Ize) (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.47; see also A.MAŠOVIĆ:P4850.p.51
ZUKIĆ	SENAD	RIFET	24/12/1969	Male	REDACTED; REDACTED; P3637.p.7 (duplicate of P3376); P4898.p.41/P3374.p.1 (partial duplicates); A.MAŠOVIĆ:P4853.p.47; see also A.MAŠOVIĆ:P4850.p.51
Sanski Most A.12.4					
ALIBEGOVIĆ	Hasan	Husein	14/06/1956	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.47; P4899.p.8-9; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Hilmo	Suljo	10/07/1927	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.47; P4899.p.17-18; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Husein	Jusuf	10/08/1931	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.47; P4899.p.16-17; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Ibrahim	Mahmut	10/01/1943	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.47; P4899.p.12-13 (FaN Mehmed); see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Ismet	Hilmo	15/03/1971	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.47; P4899.p.18-19; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Jasmin	Ibrahim	01/01/1972	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.47; P4899.p.6-7; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Muhamed	Mahmut	10/04/1951	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.47; P4899.p.7-8; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Mujaga	Mujo	04/06/1928	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.48; P4899.p.11-12; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Nazif	Đulaga	15/11/1930	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.48; P4899.p.10; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Nijaz	Mujaga	13/09/1960	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.48; P4899.p.15-16; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Sakib	Sevdaga	06/07/1956	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.48; P4899.p.13-14; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Sejad	Nazif	02/04/1959	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.48; P4899.p.2-3; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Sevdaga	Mujo	15/09/1930	Unknown	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.48; P4899.p.3-4; see also A.MAŠOVIĆ:P4850.p.52
ALIBEGOVIĆ	Zijad	Nazif	31/08/1953	Male	REDACTED; see also P4900; A.MAŠOVIĆ:P4853.p.48; P4899.p.5-6; see also A.MAŠOVIĆ:P4850.p.52

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Sanski Most A.12.5					
BANOVIĆ	Josip	Ivo	14/10/1971	Male	REDACTED; G.STOJIĆ:P3515,pp.16,18; P3518 p.1; A.MAŠOVIĆ:P4853,p.48
NIKIĆ	Žarko	Martin	28/01/1958	Male	REDACTED; G.STOJIĆ:P3515,pp.16,18; P3518 p.1 (FN Žare); A.MAŠOVIĆ:P4853,p.48
NIKIĆ	Pero	Marko	09/09/1954	Male	REDACTED; G.STOJIĆ:P3515,pp.16,18,32-33; P3518 pp.1-2; A.MAŠOVIĆ:P4853,p.48 (DOB 1959)
POTALEC	Tomo	Josip	13/12/1950	Male	REDACTED; G.STOJIĆ:P3515 pp.32-33; G.STOJIĆ:T.19768; P3518 p.1 (FN Tomica); A.MAŠOVIĆ:P4853,p.48
TADIĆ	Dragan	Nikola	03/06/1967	Male	REDACTED; G.STOJIĆ:P3515,pp.16,18,32-33; P3518 p.2; A.MAŠOVIĆ:P4853,p.48
TADIĆ	Karlo	Marko	16/06/1952	Male	REDACTED; G.STOJIĆ:P3515,pp.32-33; P3518 p.2; A.MAŠOVIĆ:P4853,p.48
TUTIĆ	Anto	Ivo	30/09/1960	Male	REDACTED; G.STOJIĆ:P3515,pp.16,18,32-33 (FN Ante); P3518 p.2 (FN Ante); A.MAŠOVIĆ:P4853,p.48 (FN Ante, FaN Ivan)
TUTIĆ	Bone	Mate	26/08/1937	Male	REDACTED; G.STOJIĆ:P3515,pp.32-33 (FN Bono); P3518 p.1; A.MAŠOVIĆ:P4853,p.48
TUTIĆ	Ivo	Nikola	23/06/1931	Male	REDACTED; G.STOJIĆ:P3515,pp.32-33; P3518 p.1; A.MAŠOVIĆ:P4853,p.48
Sokolac A.13.1					
ŠETIĆ	Osman	Alija	05/09/1910	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.6(LN ŠESTIĆ); A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
ČATIĆ	Adem	Asim	01/01/1942	Male	P3297,p.16; A.MAŠOVIĆ:P4853,p.48; see also A.MAŠOVIĆ:P4850,pp.53- 54
ČOLIĆ	Hasib	Hasib	01/01/1945	Male	P3297,p.14; A.MAŠOVIĆ:P4853,p.48; see also A.MAŠOVIĆ:P4850,pp.53- 54
ČOLIĆ	Nezim	Ćamil	01/01/1953	Male	P3297,p.13; A.MAŠOVIĆ:P4853,p.48; see also A.MAŠOVIĆ:P4850,pp.53- 54
HODŽIĆ	Ismet	Mustafa	01/01/1925	Male	P3297,p.12; A.MAŠOVIĆ:P4853,p.48; see also A.MAŠOVIĆ:P4850,pp.53- 54
KABAŠ	ZAHID	EMIN	09/08/1935	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.15; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	EDHEM	ALLJA	01/01/1907	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.12; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	EDIN	HILMIJA	16/09/1970	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.11; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	FIKRET	NAIL	27/08/1956	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.16; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
KARIĆ	HALIS	KASIM	01/03/1967	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.4; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	HILMIJA	ŠAHIN	25/04/1943	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.11; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	HUSEIN	HASAN	17/11/1923	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.15(FN Huso); A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	IZET	SULJO	13/06/1917	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.14; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	KASIM	ADIL	02/02/1937	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.5; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	LUTVIJA	MURAT	13/09/1931	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.14(FN Lutvo); A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	MEHMED-MEŠA	HUSO	02/07/1952	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.8; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	NAIL	SALKO	08/11/1936	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.10; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	REDŽO	ŠEMSO	20/03/1956	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.11; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	RIFET	NAIL	27/02/1968	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.17; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	SEAD	IZET	05/08/1965	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.9; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
KARIĆ	SULJO	MURAT	12/07/1939	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.13; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
OČUŽ	ASIM	OMER	30/04/1942	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.6; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
OČUŽ	DAMIR	MUNEVER	11/04/1977	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.5; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
OČUŽ	HASAN	EMIN	15/10/1913	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.17; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
OČUŽ	ISMET	ASIM	01/09/1975	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.7; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
OČUŽ	LUTVO	OMER	07/04/1936	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.15; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
OČUŽ	MUNEVER	AHMET	17/08/1951	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.6; A.MAŠOVIĆ:P4853,p.49 (FaN Ahmed); see also A.MAŠOVIĆ:P4850,pp.53-54

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
PAŠIĆ	Salim	Himzo	01/01/1939	Male	P3297,p.7; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
PAŠIĆ	Sead	Rasim	01/01/1962	Male	P3297,p.4; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	ŠAČIR	RAMO	04/10/1930	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.9; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	ČAMIL	IBRO	04/07/1930	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.13; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	AMIR	MUSTAFA	25/05/1974	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.8; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	Amir	Memiš	02/01/1969	Male	M.SELMANOVIĆ:P3295,para.21
SELMANOVIĆ	AZIM	ŠAČIR	11/09/1958	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.12; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	MEMIŠ	MUJO	24/04/1936	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.4; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	MEMO	SALKO	18/09/1962	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.4; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	MUHAMED	MUHAREM	06/04/1974	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.8; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	Muharem	Ago	13/11/1942	Male	M.SELMANOVIĆ:P3295,para.21
SELMANOVIĆ	MUSTAFA	AGO	30/06/1941	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.10; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	OSMAN	RAMO	15/07/1926	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.16; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	SALKO	ALJA	06/08/1930	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.5; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	SMAIL	MUJO	25/12/1934	Male	M.SELMANOVIĆ:P3295,para.21 (FN Smajo); P3297,p.9; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
SELMANOVIĆ	VELJA	SMAJO	03/02/1957	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.10; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
VATREŠ	BAJRO	ŠEĆAN	26/02/1963	Male	M.SELMANOVIĆ:P3295,para.21; P3297,p.7; A.MAŠOVIĆ:P4853,p.49; see also A.MAŠOVIĆ:P4850,pp.53-54
Višegrad A.14.2					
ČELIK	HILMO	MUŠAN	05/03/1931	Male	F.SPAHIĆ:P60,p.10; P4902,p.14; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
ČELIK	MUŠAN	EŠEF	29/11/1963	Male	F.SPAHIĆ:P60,p.10; P4902,p.29; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
ABAZ	Hamid	Musan	01/01/1933	Male	F.SPAHIĆ:P60,p.10 ; A.MAŠOVIĆ:P4853,p.49 (DOB 1928); see also P4902 and A.MAŠOVIĆ:P4850,p.53
AHMETSPAHIĆ	ABID	HAŠIM	24/03/1952	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.16; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
AHMETSPAHIĆ	HAMED	HAŠIM	16/01/1961	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.13; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
DELIBAŠIĆ	HAŠIM	ARIF	11/03/1957	Male	P4902,p.23; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
HAJDAREVIĆ	ISMET	ĆAMIL	20/05/1940	Male	P4902,p.15; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
HALILOVIĆ	AHMO	MUSTAFA	01/01/1930	Male	P4902,p.25; A.MAŠOVIĆ:P4853,p.50 (FaN Osman); see also A.MAŠOVIĆ:P4850,p.53
IBIŠEVIĆ	OSMAN	VAHID	23/12/1951	Male	P4902,p.28; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARAMAN	ESAD	IBRAHIM	30/12/1960	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.38; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARAMAN	FIKRET	ABID	09/10/1948	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.35; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARAMAN	HAMED	IBRAHIM	01/11/1966	Male	P4902,p.41; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARAMAN	HASAN	HAMED	12/05/1967	Male	F.SPAHIĆ:P60,p.10 ; A.MAŠOVIĆ:P4853,p.50; see also P4902 and A.MAŠOVIĆ:P4850,p.53
KARAMAN	IZET	IBRAHIM	27/11/1973	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.26; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARAMAN	MIRSAD	IBRAHIM	25/05/1964	Male	F.SPAHIĆ:P60,p.10 ; A.MAŠOVIĆ:P4853,p.50; see also P4902 and A.MAŠOVIĆ:P4850,p.53
KARAMAN	SABIT	HAMED	11/02/1956	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.15; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARAMAN	SAFET	JUSUF	15/09/1969	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.28; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARAMAN	ZARIF	SABIT	10/03/1932	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.29; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARIŠIK	DŽEMAL	DŽEMAIL	14/06/1958	Male	P4902,p.26; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KARIŠIK	NESIB	HASIB	08/10/1933	Male	P4902 p.30; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KASAPOVIĆ	ZAIM	NURKO	20/11/1952	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.22; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
KUSTURA	DŽEMAL	OSMAN	16/11/1962	Male	P4902,p.25; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KUSTURA	ENES	ISMET	25/05/1975	Male	F.SPAHIĆ:P60,p.10 (Ismet KUSTURA and his two sons); P4902,p.33; A.MAŠOVIĆ:P4853,p.50; see also A.MAŠOVIĆ:P4850,p.53
KUSTURA	Esad	Medo	01/01/1967	Male	F.SPAHIĆ:P60,p.10 ; A.MAŠOVIĆ:P4853,p.50; see also P4902 and A.MAŠOVIĆ:P4850,p.53
KUSTURA	HUSO	HASAN	15/05/1934	Male	P4902,p.34; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
KUSTURA	ISMET	MUŠAN	29/01/1941	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.18; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
KUSTURA	MEDO	MEHO	23/08/1936	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.41; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
KUSTURA	MUHAMED	ALJIA	26/06/1965	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.27; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
KUSTURA	Smajo	Huso	07/09/1955	Male	A.MAŠOVIĆ:P4853,p.51; see also P4902 and A.MAŠOVIĆ:P4850,p.53
KUSTURA	SUVAD	ISMET	11/02/1972	Male	F.SPAHIĆ:P60,p.10 (Ismet KUSTURA and his two sons); P4902,p.13; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
KUSTURA	ZAIM	MEDO	27/09/1963	Male	A.MAŠOVIĆ:P4853,p.51; see also P4902 and A.MAŠOVIĆ:P4850,p.53
KUSTURA	Zajko			Male	F.SPAHIĆ:P60,p.10
LEMEZAN	ISMET	MUJO	20/07/1946	Male	P4902,p.37; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
LOŠIĆ	IBRAHIM	MEHO	15/05/1931	Male	A.MAŠOVIĆ:P4853,p.51; see also P4902 and A.MAŠOVIĆ:P4850,p.53
LOŠIĆ	JUSUF	MEHO	15/06/1939	Male	A.MAŠOVIĆ:P4853,p.51; see also P4902 and A.MAŠOVIĆ:P4850,p.53
MENZILOVIĆ	OMER	HUSEIN	15/10/1939	Male	P4902,p.38; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
MUNIKOZA	IBRAHIM	MUJO	01/01/1961	Male	P4902,p.24; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
OMEROVIĆ	ŠEVAL	MUJO	21/07/1952	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.7; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
OMEROVIĆ	MEHO	HAMED	15/08/1937	Male	P4902,p.19; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
OMEROVIĆ	MENSUR	MUSTAFA	26/06/1972	Male	F.SPAHIĆ:P60,p.10 (Musa OMEROVIĆ and his two sons); P4902,p.10 (FN Mesur); A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
OMEROVIĆ	MUSTAFA	SMAIL	13/03/1941	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.30; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
OMEROVIĆ	SALKO	ZAJKO	26/03/1949	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.32; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
OMEROVIĆ	SMAIL	MUSTAFA	08/12/1969	Male	F.SPAHIĆ:P60,p.10 (Musa OMEROVIĆ and his two sons); P4902,p.11; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
SPAHIĆ	EŠREF	ZAIM	15/09/1961	Male	F.SPAHIĆ:P60,p.10 ; P4902,p.34; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
ZUKIĆ	MUHAREM	MEHMED	04/10/1955	Male	P4902,p.27; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
ZUKIĆ	SMAIL	RAMO	11/04/1949	Male	P4902,p.9; A.MAŠOVIĆ:P4853,p.51; see also A.MAŠOVIĆ:P4850,p.53
Vlasenica A.15.1					
ALIĆEVIĆ	Huso	Adem	01/01/1944	Male	REDACTED; A.MAŠOVIĆ:P4853,p.51
HODŽIĆ	NEDŽAD	AVDO	20/10/1961	Male	I.OSMANOVIĆ:P3212,para.93; A.MAŠOVIĆ:P4853,p.55
HODŽIĆ	Osmo	Osman	29/04/1966	Male	REDACTED; I.OSMANOVIĆ:P3212,para.93; A.MAŠOVIĆ:P4853,p.53
JAHIĆ	EKREM	MEHO	18/10/1959	Male	REDACTED; I.OSMANOVIĆ:P3212,para.93; A.MAŠOVIĆ:P4853,p.53
JAHIĆ	Meho (Abdulah)	Aljo	01/01/1927	Male	REDACTED; I.OSMANOVIĆ:P3212,para.93 (FN Abdulah); A.MAŠOVIĆ:P4853,p.53
KIČIĆ	FNU (Brother of Jasmin)			Male	REDACTED;
KIČIĆ	Jasmin			Male	REDACTED;
MALEŠEVIĆ	Hadžo			Male	REDACTED;
SALJHOVIĆ	Braco			Male	REDACTED;
SALJHOVIĆ	Fadil	Smajo	13/08/1938	Male	REDACTED; A.MAŠOVIĆ:P4853,p.54
SALJHOVIĆ	Goro			Male	REDACTED;
Vlasenica A.15.2					
AVDIĆ	Šaban	Ramo	01/01/1931	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.55
AVDIĆ	Mustafa	Šaban	01/01/1964	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.55
AVDIĆ	Salim	Šaban	01/01/1964	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.55
BERBIĆ	Fatima			Female	REDACTED; M.SAIM-HODŽIĆ:P418,p.8
BERBIĆ	Mustafa	Osman	01/01/1928	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.55
DUGALIĆ	Šaha	Muharem	01/01/1933	Female	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.55

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
DUGALIC	Raif	Avdo	01/01/1962	Male	REDACTED; A. MAŠOVIĆ:P4853,p.55
HAMIDOVIĆ	Alija	Ibro	01/01/1952	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.55
HAMIDOVIĆ	Asim	Ibro	01/01/1966	Male	REDACTED; A. MAŠOVIĆ:P4853,p.55
HAMIDOVIĆ	Asko			Male	M.SAIM-HODŽIĆ:P418,p.7
HAMIDOVIĆ	Bego	Mujo	01/01/1973	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.55
HAMIDOVIĆ	Edin		01/01/1982	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7
HAMIDOVIĆ	Edina			Female	M.SAIM-HODŽIĆ:P418,p.7
HAMIDOVIĆ	Fata			Female	REDACTED;
HAMIDOVIĆ	Hašim	Ibro	01/01/1958	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.55
HAMIDOVIĆ	Hamed			Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7
HAMIDOVIĆ	Meho			Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7
HAMIDOVIĆ	Osman	Mujo	01/01/1964	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.55
HAMIDOVIĆ	Senahid	Saliko	01/01/1948	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.55
HAMIDOVIĆ	Zada			Female	REDACTED; M.SAIM-HODŽIĆ:P418,p.7
HODŽIĆ	Đulsuma	Hadžo	01/01/1930	Female	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Ades			Male	M.SAIM-HODŽIĆ:P418,p.7
HODŽIĆ	Adesa			Female	M.SAIM-HODŽIĆ:P418,p.7
HODŽIĆ	Admir	Fadil	01/01/1983	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.55 (DOB 1985)
HODŽIĆ	Admira	Rifet	01/01/1988	Female	REDACTED; A. MAŠOVIĆ:P4853,p.56 (DOB 1984)
HODŽIĆ	Admira		01/01/1980	Female	REDACTED; M.SAIM-HODŽIĆ:P418,p.7
HODŽIĆ	Anesa		01/01/1985	Female	REDACTED;
HODŽIĆ	Asim	Ramiz	01/01/1989	Male	REDACTED; A. MAŠOVIĆ:P4853,p.56 (DOB 1986)
HODŽIĆ	Bećir	Ibro	01/01/1948	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Behadil	Ibiš	01/01/1951	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Enisa	Hamed	01/01/1964	Female	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Fadil	Ibiš	01/01/1956	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Hamdija	Ibro	01/01/1960	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Haso	Ibro	01/01/1953	Male	REDACTED; M.SAIM-HODŽIĆ:P418,pp.5-7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Huso	Ibro	01/01/1951	Male	REDACTED; M.SAIM-HODŽIĆ:P418,pp.6-7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Ibiš	Rašid	01/01/1922	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Ibrahim	Redžo	01/01/1952	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Ibro	Bećir	01/01/1925	Male	REDACTED; M.SAIM-HODŽIĆ:P418,pp.6-7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Ismet	Bećir	01/01/1927	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A. MAŠOVIĆ:P4853,p.56
HODŽIĆ	Ismeta			Female	REDACTED;

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HODŽIĆ	Makbula	Ismet	01/01/1957	Female	M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56 (FN Magbula)
HODŽIĆ	Meho	Ismet	01/01/1964	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
HODŽIĆ	Mersudin	Huso	01/01/1977	Male	REDACTED; M.SAIM-HODŽIĆ:P418,pp.6-7; A.MAŠOVIĆ:P4853,p.56
HODŽIĆ	Muhamed	Abdulah	01/01/1963	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
HODŽIĆ	Mujo	Hasan	01/01/1927	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
HODŽIĆ	Rifet	Ismet	01/01/1956	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
HODŽIĆ	Sadmir	Behadil	01/01/1980	Male	REDACTED; A.MAŠOVIĆ:P4853,p.56 (DOB 1981)
HODŽIĆ	Safet	Ibro	01/01/1963	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
HODŽIĆ	Sajma			Female	M.SAIM-HODŽIĆ:P418,p.7
HODŽIĆ	Salih	Hasan	01/01/1982	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56 (DOB 1983)
HODŽIĆ	Sedin		01/01/1974	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7
HODŽIĆ	Velida	Huso	01/01/1957	Female	M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
HRELJIĆ	Muradif			Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7
HRELJIĆ	Murat	Osman	01/01/1963	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
MAHMUTOVIĆ	Mustafa	Fejzo	01/01/1951	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.56
SALJHOVIĆ	Bajro	Ibrahim	01/01/1933	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
SALJHOVIĆ	Edin	Osman	01/01/1979	Male	REDACTED; A.MAŠOVIĆ:P4853,p.56
SALJHOVIĆ	Edina	Osman	01/01/1982	Female	REDACTED; A.MAŠOVIĆ:P4853,p.56 (DOB 1983)
SALJHOVIĆ	Fatima	Hamed	01/01/1956	Female	REDACTED; A.MAŠOVIĆ:P4853,p.56
SALJHOVIĆ	Mujaga	Bajro	01/01/1966	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.56
SALJHOVIĆ	Nedžad	Saliko	01/01/1979	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.56
SALJHOVIĆ	Osman	Salih	01/01/1955	Male	REDACTED; A.MAŠOVIĆ:P4853,p.56
SALJHOVIĆ	Saliko	Ibrahim	01/01/1941	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.7; A.MAŠOVIĆ:P4853,p.56
SELIMOVIC	Adem	Junuz	01/01/1939	Male	REDACTED; A.MAŠOVIĆ:P4853,p.56
SELIMOVIC	Junuz	Adem	01/01/1963	Male	REDACTED; M.SAIM-HODŽIĆ:P418,p.8; A.MAŠOVIĆ:P4853,p.56
SELIMOVIC	Salih	Mehmed	01/01/1934	Male	REDACTED; A.MAŠOVIĆ:P4853,p.57
Zvornik A.16.1					
ŠEHIĆ	Hakija	Rašid	01/01/1931	Male	REDACTED; P2919,p.7; A.MAŠOVIĆ:P4853,p.57
AHMETOVIĆ	Šemsudin	Ahmet	01/01/1962	Male	A.MAŠOVIĆ:P4853,p.57
AHMETOVIĆ	Nusret	Ahmet	01/01/1966	Male	A.MAŠOVIĆ:P4853,p.57
ALAJBEGOVIĆ	Fahrudin	Džemaludin	01/01/1929	Male	A.MAŠOVIĆ:P4853,p.57 (FaN Džemal)
BILALIĆ	Sabid	Šerif	01/01/1943	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.57 (FN Sabit)
BILALIĆ	Samir	Sabit	07/03/1968	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.57
BILALIĆ	Senad	Sabit	15/12/1970	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.57
FALRUDIN	Nale (phoen)				P.PANIĆ:P3380,p.15

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FUTOVIĆ	FNU	Taib			KDZ059:P67,p.19; A.MAŠOVIĆ:P4853,p.57 (LN HUDOVIĆ, FN Asim, DOB 1958)
FUTOVIĆ	Taib				KDZ059:P67,p.19; A.MAŠOVIĆ:P4853,p.57 (LN HUDOVIĆ, DOB1929)
HIDIĆ	Sejad	Hasan	01/01/1967	Male	A.MAŠOVIĆ:P4853,p.57
HIDIĆ	Senad	Hasan	01/01/1972	Male	A.MAŠOVIĆ:P4853,p.57
KOJIĆ	Ivo	Mijo	01/01/1944	Male	A.MAŠOVIĆ:P4853,p.57
KARAOŠMANOVIĆ	Ilijaz	Rasim	01/01/1950	Male	J.AVDISPahiĆ:P70,p.6 (3 sons of Rasim); A.MAŠOVIĆ:P4853,p.58
KARAOŠMANOVIĆ	Nedžad	Rasim	01/01/1955	Male	J.AVDISPahiĆ:P70,p.6 (3 sons of Rasim); A.MAŠOVIĆ:P4853,p.58
KARAOŠMANOVIĆ	Nijaz	Rasim	01/01/1948	Male	J.AVDISPahiĆ:P70,p.6 (3 sons of Rasim); A.MAŠOVIĆ:P4853,p.58
KUJUNDŽIĆ	Fehim	Fahrija	01/01/1948	Male	REDACTED; P2919,p.7; REDACTED; A.MAŠOVIĆ:P4853,p.57
LNU	Izet			Male	REDACTED; P2919,p.7; A.MAŠOVIĆ:P4853,p.57 (LN SABIROVIĆ, FaN Daut)
ZAIMOVIĆ	Muhamed				REDACTED; P4849
Zvornik A.16.3					
HAMZIĆ	Asim	Abid	17/06/1961	Male	REDACTED; A.MAŠOVIĆ:P4853,p.66; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
HASANOVIĆ	MURADIF	ALIJA	21/07/1957	Male	REDACTED; A.MAŠOVIĆ:P4853,p.66; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
HASANOVIĆ	SEJDO	MUJO	10/10/1956	Male	REDACTED; A.MAŠOVIĆ:P4853,p.66; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
SMAJLOVIĆ	SMAJO	MAHMUT	01/02/1959	Male	REDACTED; A.MAŠOVIĆ:P4853,p.72; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
Banja Luka B.1.1					
BAHTIĆ	Ermin	Hasan	05/07/1931	Male	S.MUHIĆ:P700,p.30 (FN "Zenga"); S.MUHIĆ:P701,p.9-10; A.MAŠOVIĆ:P4853,p.73 (DOB 1961)
BIŠČEVIĆ	Haris	Faik	01/01/1964	Male	S.MUHIĆ:P700,p.30; S.MUHIĆ:P701,p.9-10; A.MAŠOVIĆ:P4853,p.73
HADŽIAHMETOVIĆ	Medin	Esad	01/01/1960	Male	S.MUHIĆ:P700,p.30 (FN Elvedin); S.MUHIĆ:P701,p.9-10; A.MAŠOVIĆ:P4853,p.73
JELEČEVIĆ	Jasmin	Aiz	01/01/1965	Male	S.MUHIĆ:P700,p.30 (FN Jasko); S.MUHIĆ:P701,p.9-10; A.MAŠOVIĆ:P4853,p.73
MEHADŽIĆ	Neron	Esad	10/11/1957	Male	S.MUHIĆ:P700,p.30; S.MUHIĆ:P701,p.9-10; A.MAŠOVIĆ:P4853,p.73 (DOB 1953)
PAŠIĆ	Fajko	Jusuf	01/01/1965	Male	S.MUHIĆ:P700,p.30; S.MUHIĆ:P701,p.9-10; A.MAŠOVIĆ:P4853,p.73
Banja Luka B.1.2					
AVDIĆ	Zijad			Male	A.ZULJIĆ:P718,paras.94,104

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BAJREKTAREVIĆ	Jasmin	Hakija	11/12/1973	Male	REDACTED; A.MAŠOVIĆ:P4853,p.48
BIŠEVIĆ	Edin	Faik	02/06/1966	Male	A.ZULJIĆ:P718,paras.100-101; A.MAŠOVIĆ:P4853,p.73
BURNIĆ	Enver	Mustafa	30/03/1959	Male	A.ZULJIĆ:P718,paras.99-101; A.MAŠOVIĆ:P4853,p.73
DELIĆ	ADAM	Ivo	09/04/1964	Male	A.MAŠOVIĆ:P4853,p.48
DELIĆ	Mirhad	Hajro	02/06/1957	Male	A.ZULJIĆ:P718,para.105; P724; A.MAŠOVIĆ:P4853,p.73
HODŽIĆ	Hivzo	Salih	03/04/1926	Male	P724; A.MAŠOVIĆ:P4853,p.48
HODŽIĆ	ISMET	AZIZ	07/11/1949	Male	REDACTED; P724 (LN HIDŽIĆ); A.MAŠOVIĆ:P4853,p.48
HODŽIĆ	Mustafa			Male	A.ZULJIĆ:P718,para.105; P724
HUKANOVIĆ	SEVDAGA	SAFET	30/05/1974	Unknown	REDACTED; A.ZULJIĆ:P718,paras.88,104,105; P724; A.MAŠOVIĆ:P4853,p.48
JAKUPOVIĆ	ADEM	HASAN	31/03/1928	Male	REDACTED; A.ZULJIĆ:P718,paras.94,104; A.MAŠOVIĆ:P4853,p.48
JUSIĆ	Ramo	Tale	01/06/1953	Male	REDACTED; P724
KAMIĆ	FADIL	MUSTAFA	11/04/1942	Male	A.ZULJIĆ:P718,paras.104,105; P724; A.MAŠOVIĆ:P4853,p.48
KERIĆ	Atif	Hasan	01/01/1949	Male	P724; A.MAŠOVIĆ:P4853,p.73
HALIMOVIĆ	MIRSAD	AVDO	13/12/1959	Male	A.ZULJIĆ:P718,paras.104,105; P724 (FN Mirsad); A.MAŠOVIĆ:P4853,p.48
MATANOVIĆ	Vinko	Ante	13/05/1954	Male	REDACTED; P724; A.MAŠOVIĆ:P4853,p.48
MAUZNER	Vencislav	Drago	23/09/1957	Male	A.ZULJIĆ:P718,paras.100-101
MEHIĆ	IZET	HUSEIN	26/10/1952	Male	A.MAŠOVIĆ:P4853,p.48
MEMIĆ	Ismet			Male	P724
MLINAR	Ivo			Male	A.ZULJIĆ:P718,para.104
MLINAR	Josip	Mato	01/12/1951	Male	REDACTED; A.ZULJIĆ:P718,para.105; P724; A.MAŠOVIĆ:P4853,p.48
MUŠIĆ	Ibrahim	Husein	02/03/1933	Male	P724 (FN Ibro); A.MAŠOVIĆ:P4853,p.73
MUHIĆ	DŽEVAD	JUSUF	29/01/1957	Male	A.ZULJIĆ:P718,paras.91,105 ("Rane"); P724; A.MAŠOVIĆ:P4853,p.48
MUHIĆ	NEDŽAD	JUSUF	04/10/1954	Male	A.ZULJIĆ:P718,paras.91,105; P724; A.MAŠOVIĆ:P4853,p.48
MUJADŽIĆ	ZIJAD	AVDO	14/07/1943	Male	P4408; P724; A.MAŠOVIĆ:P4853,p.48
PRŠIĆ	Muharem	Omer	01/01/1936	Male	P724; A.MAŠOVIĆ:P4853,p.48
TALIĆ	KEMAL	IBRAHIM	27/02/1954	Male	P724; A.MAŠOVIĆ:P4853,p.48 (Kemo)
TALIĆ	Zikret			Male	A.ZULJIĆ:P718,para.104
TUTIĆ	Ivica	Svetko	30/05/1954	Male	REDACTED; P724 (FN Ivan); A.MAŠOVIĆ:P4853,p.73
Banja Luka B.1.3					
ALISIĆ	Jasmin			Male	KDZ074:P711.p.14; REDACTED;
BABIĆ	Said	Džemal	27/07/1953	Male	REDACTED; REDACTED; P4873; A.MAŠOVIĆ:P4853,p.73; See also P4874 and P4875, Court Record of Exhumation and Autopsy reports, A.MAŠOVIĆ:P4850,pp.41-42

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BASIC	Mihad			Male	REDACTED;
CRNALIĆ	DEDO	DERVIŠ	15/10/1926	Male	REDACTED; P4874 (DOB 13/10/26); KDZ074:P711,p.14; REDACTED; REDACTED; KDZ048:P678,pp.60-64,169-170 ; P4873; See also P4874 and P4875, Court Record of Exhumation and Autopsy reports, A.MAŠOVIĆ:P4850,pp.41-42; A.MAŠOVIĆ:P4853,p.73
JAKUPOVIĆ	Kemal			Male	KDZ048:P678,p.64
KRAK	NEZIR	MUSTAFA	08/03/1950	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4850,para.111; P4873; A.MAŠOVIĆ:P4853,p.73; P6869,p.2; see also P4874 and P4875, Court Record of Exhumation and Autopsy reports, A.MAŠOVIĆ:P4850,pp.41-42
TOKMADŽIĆ	ZVONKO	JURE	31/07/1942	Male	P4873(FaN Juro); See also P4874 and P4875, Court Record of Exhumation and Autopsy reports,A.MAŠOVIĆ:P4850,pp.41-42; A.MAŠOVIĆ:P4853,p.73
Banja Luka B.1.4					
BENDER	Esad	Ibrahim	24/11/1959	Male	REDACTED; P4872; A.ZULIĆ:P718,para.123; S.MUHIĆ:P701,pp.11-12; N.SEBIRE:P694,p.197; P533 pp.3-7; P556; A.MAŠOVIĆ:P4850,p.41; A.MAŠOVIĆ:P4853,p.73
FILIPOVIĆ	Omer	Suljo	04/04/1953	Male	REDACTED; P4872; A.EGRLIĆ:P6586,p165; A.ZULIĆ:P718,para.123; S.MUHIĆ:P701,pp.11-12; N.SEBIRE:P694,p.197; P533 pp.8-12; P555; A.MAŠOVIĆ:P4850,p.41; A.MAŠOVIĆ:P4853,p.73
MULALIĆ	Emir	Hilmije	31/03/1962	Male	R.BEGIĆ:P692,p.7
Bijeljina B.2.1					
CUDIĆ	Edhem			Male	REDACTED; S.HUSREFOVIĆ:P58,p.12 (FN Ekrem); E.PASIĆ:P59,p.37; I.OSMANOVIĆ:P3212,para.164
CURTIĆ	Husein			Male	REDACTED; I.OSMANOVIĆ:P3212,para.168
HADZIJOMEROVIĆ	Žulfo	Meho	05/07/1922	Male	I.OSMANOVIĆ:P3212,paras.165-168; E.PASIĆ:P59,p.37
HODŽIĆ	Mehmed		01/01/1927	Male	E.PASIĆ:P59,p.37
LNU	Hamdo		01/01/1927	Male	E.PASIĆ:P59,p.37
ZEČEVIĆ	Fetid	Alija	01/01/1950	Male	REDACTED; I.OSMANOVIĆ:P3212,para.168 ; A.MAŠOVIĆ:P4853,p.73
Bratunac B.4.1					
ČOMIĆ	Hajrudin	Mustafa	01/01/1954	Male	REDACTED; A.MAŠOVIĆ:P4853,p.2
HADZIBULIĆ	Husnija	Huso	01/01/1963	Unknown	REDACTED; A.MAŠOVIĆ:P4853,p.3
HODŽIĆ	Džemo	Salcin	01/01/1952	Male	REDACTED; KDZ605:T.17922-17923 ; A.MAŠOVIĆ:P4853,p.3
HUSENOVIĆ	Zaim	Nedžib	01/01/1960	Male	REDACTED;
HUSIĆ	Mensur	Muhamed	01/01/1962	Male	REDACTED; A.MAŠOVIĆ:P4853,p.3

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
KARIĆ	Ramo	Suljo	01/01/1954	Male	REDACTED; A.MAŠOVIĆ:P4853,p.4
KARIĆ	Safet	Nurija	01/01/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.4
MUHIĆ	Omer	Šećo	01/01/1949	Male	REDACTED; A.MAŠOVIĆ:P4853,p.4
MUJKANOVIĆ	Mustafa	Miralem	01/01/1950	Male	REDACTED; A.MAŠOVIĆ:P4853,p.5
MURATOVIĆ	Hazim			Male	REDACTED;
SALKIĆ	Ahmet	Hamed	01/01/1964	Male	REDACTED; A.MAŠOVIĆ:P4853,p.5
Brčko B.5.1					
ČUMUROVIĆ	Jasminko	Jusuf	08/06/1954	Male	S.HUSREFOVIĆ:P58,pp.8-9 ; A.MAŠOVIĆ:P4853,p.74
DEDIĆ	Enver	Rasim	03/03/1953	Male	REDACTED;
GLAVOČEVIĆ	Stipo	Nikola	22/09/1939	Male	AF2363; REDACTED; A.MAŠOVIĆ:P4853,p.74
LNU	Faruk (aka Čita)			Male	S.HUSREFOVIĆ:P58,p.9
VATIĆ	Osman				REDACTED;
Foča B.8.1					
ŠLJIVO	Ekrem	Ibro	02/12/1966	Male	A.MAŠOVIĆ:P4853, p.79
ŠLJIVO	Mehmedalija	Hakija	02/08/1966	Male	A.MAŠOVIĆ:P4853, p.79
ŠLJIVO	Mustafa	Mujo	13/11/1956	Male	A.MAŠOVIĆ:P4853, p.83 (DOB 1905)
ŠORO	Ševal	Edhem	27/08/1956	Male	KDZ239:P3336,p.79; KDZ017:P3568,pp.95-96,189-191; P3351
ĐOZO	EKREM	IBRAHIM	16/06/1959	Male	A.MAŠOVIĆ:P4853, p.80; See also P4876 and A.MAŠOVIĆ:P4850,p.42
ČANKUŠIĆ	ŠEMSO	IBRO	17/01/1948	Male	A.MAŠOVIĆ:P4853, p.80; See also P4876 and A.MAŠOVIĆ:P4850,p.42
ČANKUŠIĆ	ABDURAHMAN	HASAN	22/03/1957	Male	KDZ239:P3336,pp.70-72; KDZ017:P3568,pp.111,192; P3351;
ČANKUŠIĆ	Refik	Hasan	01/01/1960	Male	A.MAŠOVIĆ:P4853, p.81
ČEDIĆ	Enko	Hamid	01/01/1964	Male	KDZ239:P3336,pp.72-73; KDZ017:P3568,p.110; P3351
ČEDIĆ	Zaim				KDZ017:P3568,pp.118,120
ALJUKIĆ	Munib	Hasan	31/05/1957	Male	A.MAŠOVIĆ:P4853, p.81
ALTOKA	Alija			Male	KDZ239:P3336,pp.70-71; KDZ017:P3568,pp.97,101,110,191-192; P3351
ALTOKA	Miralem			Male	KDZ017:P3568,pp.101,191
BAČVIĆ	SMAIL	LATIF	01/04/1947	Male	A.MAŠOVIĆ:P4853, p.79; See also P4876 and A.MAŠOVIĆ:P4850,p.42
BABALIJA	Nedžib	Sulejman	16/11/1960	Male	A.MAŠOVIĆ:P4853, p.81
BICO	Hamid	Selim	01/01/1950	Male	KDZ239:P3336,pp.58,60 (FN Hamdo, also called Salem); KDZ017:P3568,p.97,99 (FN Salem); KDZ017:T.19901-19004 (FN Salem); P3351; A.MAŠOVIĆ:P4853, p.82
BOROVINA	Ramiz	Edhem	09/02/1962	Male	A.MAŠOVIĆ:P4853, p.81

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
BUNDA	Edhem				KDZ239:P3336,pp.39-41; KDZ017:P3568,p.121
CRNETA	MURAT	RAŠID	04/09/1950	Male	A.MAŠOVIĆ:P4853, p.82
CULUM	FNU				KDZ017:P3568,p.121
DŽAFERPAHIĆ	Adnan	Juso	05/04/1970	Male	A.MAŠOVIĆ:P4853, p.78
DŽAMALJJA	Juso	Murat	01/01/1928	Male	KDZ239:P3336,pp.54,73-74; KDZ017:P3568,pp.121,191; P3351; M.KRNOJELAC:D2716,p.131; A.MAŠOVIĆ:P4853, p.82
DŽANKO	Elmedin				KDZ239:P3336,p.76; KDZ239:T.18920-18921,18979
DŽANKO	Eldin				KDZ239 P3336,p.76; KDZ239:T.18920-18921,18979
DŽANO	Hasan	Ahmet	12/01/1929	Male	KDZ017:P3568,pp.116,118,193
DŽELIL	Alija	Ramiz	01/01/1953	Male	KDZ017:P3568,p.118; A.MAŠOVIĆ:P4853, p.81
DŽELILOVIĆ	Kemal				KDZ239:P3336,p.74; P3351; KDZ017:P3568,p.120 (FN Kemo)
DŽENDUSIĆ	Ramo	Salko	01/01/1931	Male	KDZ239:P3336,p.74; KDZ017:P3568,pp.116-117,120,193,218,220-221; P3351; A.MAŠOVIĆ:P4853,p.107
DELEUT	Ismet				KDZ017:P3568,pp.122,191
DJENDUŠIĆ	Ramo				KDZ017:T.19903 (LN ODIJENDJOSIĆ /phoen/)
DURGUT	Mujo	Ahmo	01/08/1958	Male	A.MAŠOVIĆ:P4853, p.81
GRADISIĆ	FNU				KDZ239:P3336,pp.40-41
GRANOV	Adil	Safet	26/02/1957	Male	KDZ239:P3336,p.62; KDZ017:P3568,pp.110,116,192; P3351
HADŽIĆ	Esad				KDZ239:P3336,pp.51,74-76,135-136; KDZ017:P3568,pp.23-25
HADŽIMEŠIĆ	Meho	Aziz	01/07/1964	Male	A.MAŠOVIĆ:P4853, p.79
HADŽIMUŠIĆ	Nermin				KDZ017:P3568,pp.101,109,192
HADŽIMURATOVIĆ	Ahmo	Asim	13/09/1972	Male	A.MAŠOVIĆ:P4853, p.79
HAJDAREVIĆ	FNU				KDZ239:P3336,pp.39-41; KDZ017:P3568,p.121 (FN Hakan)
HASANBEGOVIĆ	Latif				KDZ017:P3568,pp.55-56
HASKOVIĆ	FNU				KDZ017:P3568,pp.55-56
HODŽIĆ	Šefik	Hali	01/01/1950	Male	A.MAŠOVIĆ:P4853, p.81
HODŽIĆ	Nail		01/01/1928	Male	KDZ017:P3568,pp.66,69,94-95,189-190; P3351
HUKOVIĆ	Gordan				KDZ239:P3336,pp.83-85
ISLAMBASIĆ	Suad				KDZ017:P3568,pp.110,116,120,193
IVANCIĆ	Mate	Mirko	04/01/1959	Male	KDZ239:P3336,p.74; KDZ017:P3568,pp.95-96,191-192; P3351
KAJGANA	Rasim	Alije	17/04/1950	Male	KDZ017:P3568,pp.119,193
KAMERIĆ	ABDULAH	AHMET	25/04/1952	Male	KDZ017:P3568,pp.128-129; A.MAŠOVIĆ:P4853, p.80; See also P4876 and A.MAŠOVIĆ:P4850,p.42
KARAHASANOVIĆ	Ismet	Edhem	01/01/1954		KDZ017:P3568,pp.101,110,116,120,192-193 ; A.MAŠOVIĆ:P4853, p.80; See also P4876 and A.MAŠOVIĆ:P4850,p.42
KISELICA	Esad				KDZ239:P3336,pp.51,74-76,135-136; KDZ017:P3568,pp.69-70,95,189- 191; P3351
KLJINAC	HAJRUDIN	ALJA	26/01/1942	Male	A.MAŠOVIĆ:P4853, p.82

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KONJO	HALID	AHMET	14/01/1956	Male	KDZ239:P3336,pp.58,60-61; P3351; A.MAŠOVIĆ:P4853, p.82
KONJO	HALIM	Ahmet	01/01/1955	Male	KDZ239:P3336,pp.58,60-61; KDZ017:P3568,pp.63-65,93,95,99,189; A.MAŠOVIĆ:P4853, p.82 (DOB 1953)
KRAJČIN	Adil	Rasim	01/01/1958	Male	KDZ239:P3336 p.76; KDZ017:P3568,pp.101,109,192; KDZ239:T.18979; P3351; A.MAŠOVIĆ:P4853, p.83
KREHO	Mirsad	Ejub	28/09/1963	Male	A.MAŠOVIĆ:P4853, p.82
KULOGLIJA	Mustafa	Bedir	15/05/1945	Male	KDZ239:P3336,p.77; KDZ017:P3568,pp.63,66 (LN KHLAGLIJA),87,94-95,189-191; KDZ017:T.19901-19904; P3351
KURTOVIĆ	MUJO	NEZIR	27/10/1962	Male	A.MAŠOVIĆ:P4853, p.83
LOJO	Nedžib	Halim	01/01/1941	Male	A.MAŠOVIĆ:P4853, p.83
MANDŽO	Fuad	Husnija	01/01/1957	Male	KDZ239:P3336,p.77; KDZ017:P3568,pp.98-99,109,192; P3351; A.MAŠOVIĆ:P4853,p.107
MARINOVIC	Krunoslav	Pero	06/04/1946	Male	KDZ239:P3336,pp.62-63; KDZ017:P3568,pp.63,66,94-95,189,192; P3351
MEZBUR	ASIM	ŠAČIR	01/01/1943	Male	KDZ239:P3336,p.64(FN Rasim); A.MAŠOVIĆ:P4853, p.80; See also P4876 and A.MAŠOVIĆ:P4850,p.42
MUJEZINović	Omer			Male	P3351; KDZ017:P3568,p.121
MUJEZINović	Samir	Dzermal	07/12/1971	Male	KDZ239:P3336,pp.77-78
MULAHASANović	Fehim	Suljo	01/01/1919	Male	A.MAŠOVIĆ:P4853, p.84
MURATOVIĆ	Avdo	Selim	01/05/1963	Male	A.MAŠOVIĆ:P4853, p.82
MURGUZ	Mujo			Male	KDZ017:P3568,pp.26-27
NIŠIĆ	Nurko	Salih	07/05/1949	Male	KDZ239:P3336,pp.58-59; KDZ017:P3568,pp.63,93,95,189-191; P3351
NIKŠIĆ	Kemo	Munib	06/04/1959	Male	A.MAŠOVIĆ:P4853, p.84
NIKŠIĆ	Sead	Vehbija	21/04/1956	Male	A.MAŠOVIĆ:P4853, p.84
OVCINA	Ibrahim	Šaban	01/01/1954	Male	KDZ017:P3568,pp.26-29,31; A.MAŠOVIĆ:P4853, p.82 (FN Ibro)
PAŠALJIĆ	Adnan			Male	KDZ017:P3568,pp.110,191
PAŠOVIĆ	Ismet			Male	KDZ017:P3568,pp.30-31
PAŠOVIĆ	Mersud	Mašo	01/01/1905	Male	A.MAŠOVIĆ:P4853,p.107
PAČO	Ismet	Rasid	27/11/1955	Male	KDZ017:P3568,pp.116,193; A.MAŠOVIĆ:P4853, p.80 (DOB 1954); See also P4876 and A.MAŠOVIĆ:P4850,p.42
RAMOVIĆ	HAMID			Male	KDZ239:P3336,p.78; P3351
REKO	RASIM	SALIKO	10/10/1938	Male	A.MAŠOVIĆ:P4853, p.80; See also P4876 and A.MAŠOVIĆ:P4850,p.42
RIKALO	HUSEIN	RAMO	18/11/1957	Male	KDZ239:P3336,pp.61,78-79; KDZ017:P3568,pp.65,189; P3351
RIKALO	MITHAT	Ramo		Male	KDZ239:P3336,pp.61,78-79; KDZ017:P3568,pp.63-65,189; P3351
RIKALO	ZAIM	RAMO	06/11/1963	Male	KDZ239:P3336,pp.61,78-79; KDZ017:P3568,pp.63-65,189; P3351
SELJANCI	Halim			Male	KDZ017:P3568,pp.55-56

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SOFRADZIJA	Mehmed	Ahmed	01/01/1946	Male	KDZ017:P3568,pp.116-118,120,193,200-201; A.MAŠOVIĆ:P4853, p.83
SUBAŠIĆ	Mirsad				KDZ239:T.18920-18921
TULEK	EKREM	AZIZ	16/07/1956	Male	KDZ017:P3568,pp.95,191; A.MAŠOVIĆ:P4853, p.81; See also P4876 and A.MAŠOVIĆ:P4850,p.42
TULEK	KEMAL	Aziz	21/10/1958	Male	M.RASEVIĆ:T.46788; KDZ239:P3336,p.79; KDZ017:P3568,pp.96,192; P3351; A.MAŠOVIĆ:P4853,p.107
TUZLAK	Husnija	Camil	01/01/1941	Male	A.MAŠOVIĆ:P4853, p.81; See also P4876 and A.MAŠOVIĆ:P4850,p.42
UZUNOVIĆ	Enes	Taiba	18/04/1960	Male	KDZ239:P3336,p.79; KDZ017:P3568,pp.101,109,192; P3351
VAHIDA	Džemal	Mustafa	15/04/1954	Male	KDZ239:P3336,p.79; KDZ017:P3568,pp.97,99,109,191-192 (FN Vahida, LN DŽEMAL); P3351
VEIZ	Munib	Edhem	31/01/1952	Male	KDZ239:P3336,pp.62-64; KDZ017:P3568,pp.63-65,189-191; KDZ017:T.19901-19004; P3351
VEIZ	ZULFO	Ibro	30/10/1950	Male	KDZ239:P3336,pp.62-64; KDZ017:P3568,pp.95,99,191; P3351
Ključ B.10.1					
ČEHIĆ	Asim	Hasan	10/06/1957	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.16; P4881,pp.50-51; see also A.MAŠOVIĆ:P4850,pp.43,45
ČEHIĆ	Husein	Hamed	20/09/1971	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.13; P3512,pp.32-33; P4881,pp.148-149; see also A.MAŠOVIĆ:P4850,pp.43,45
ČEHIĆ	Ilijas	Hamdija	23/09/1972	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,pp.13-14; P4881,pp.28-29; see also A.MAŠOVIĆ:P4850,pp.43,45
ČEHIĆ	Mirsad	Hamed	06/01/1965	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.31; P4881,pp.132-133; see also A.MAŠOVIĆ:P4850,pp.43,45
ČEMAL	Sabahudin	Hajrudin	25/03/1973	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.20; P4881,pp.70-71; see also A.MAŠOVIĆ:P4850,pp.43,45
ČEMAL	Saif	Bego	24/09/1959	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.12 (DOB 1969); P3512,pp.23-24 (FN Raif); P4881,pp.130-131; see also A.MAŠOVIĆ:P4850,pp.43,45
ČARKIĆ	Elvedin	Ferid	22/10/1973	Male	REDACTED; P3637 p.10 (LN ČERKIĆ); A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.30; P4881,pp.118-119; see also A.MAŠOVIĆ:P4850,pp.43,45
ALIČIĆ	Ramiz	Redžo	15/07/1949	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.13; P3512,p.36; P4881,pp.66-67; see also A.MAŠOVIĆ:P4850,pp.43,45

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BAJRIĆ	Šefik	Ramiz	05/10/1948	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12 (FN Refik); P3512,p.13; P4881,pp.24-25 (DOB 1950); see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Fehim	Huso	18/08/1959	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.19; P4881,p.36-37; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Husein	Huso	05/03/1953	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.26; P4881,pp.96-97; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Ibro	Ibro	10/04/1956	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,pp.19-20; P4881,pp.64-65; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Kasim	Ibrišim	29/09/1968	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.11; P3512,p.11; P4881,pp.12-13; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Meho	Meho	01/01/1955	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.13; P3512,p.35; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Mesud	Sulejman	16/07/1961	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,pp.11-12; P4881,pp.16-17; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Muharem	Huso	17/12/1964	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12, P3512,p.19; P4881,p.34-35; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Mustafa	Huso	06/03/1962	Male	REDACTED; P3637 p.11 (DOB 1963); A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.26; P4881,pp.98-99; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Nedim	Šefik	01/01/1971	Male	P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,pp.30-31; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Rifet	Mujo	29/05/1964	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,pp.25-26 (DOB 25/05); P4881,pp.94-95; see also A.MAŠOVIĆ:P4850,pp.43,45
BAJRIĆ	Zikret	Fetid	05/03/1962	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.13; P3512,p.34; P4881,pp.82-83; see also A.MAŠOVIĆ:P4850,pp.43,45
BEČIĆ	Emsud	Ajiz	15/09/1963	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12 (FaN Aziz, DOB 15/10/1963); P3512,p.14 (LN NEČIĆ, FaN Aiz, DOB 15/10/1963); P4881,pp.30-31 (FN Ensar); see also A.MAŠOVIĆ:P4850,pp.43,45
BEČIĆ	Refik	Ramiz	20/11/1955	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,pp.24-25; P4881,pp.88-89; see also A.MAŠOVIĆ:P4850,pp.43,45

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BILAJAC	Šaban	Muho	06/11/1928	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.31; P4881,pp.134-135; see also A.MAŠOVIĆ:P4850,pp.43,45
BUKVIĆ	Tifo	Vahid	05/07/1966	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.13 (DOB 1956); P3512,p.33 (DOB 1956); P4881,pp.142-143; see also A.MAŠOVIĆ:P4850,pp.43,45
BURZIĆ	Đulaga	Smail	20/09/1954	Unknown	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.15; see also A.MAŠOVIĆ:P4850,pp.43,45
DELIĆ	Almir	Mustafa	21/03/1974	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.13; P3512,p.33; P4881,pp.150-151; see also A.MAŠOVIĆ:P4850,pp.43,45
DELIĆ	Emil	Rasim	27/07/1974	Male	REDACTED; P3637 p.10 (LN DALIĆ); A.MAŠOVIĆ:P4853, p.84; P4878,p.13; P3512,p.37; P4881,pp.52-53 (FN Emir); see also A.MAŠOVIĆ:P4850,pp.43,45
DELIĆ	Fadil	Mumin	09/04/1943	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.84; P4878,p.12; P3512,p.13; see also A.MAŠOVIĆ:P4850,pp.43,45
DERVIŠEVIĆ	Karanfil	Mujo	04/06/1964	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.16; P4881,pp.44-45; see also A.MAŠOVIĆ:P4850,pp.43,45
DERVIŠEVIĆ	Rešid	Salko	17/04/1932	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.15; P4881,pp.40-41; see also A.MAŠOVIĆ:P4850,pp.43,45
DERVIŠEVIĆ	Safet	Dedo	15/05/1966	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.13; P3512,p.40; P4881,pp.10-11; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Adem	Arif	03/06/1937	Male	REDACTED; P3637 p.11; REDACTED; A.MAŠOVIĆ:P4853, p.85; P4878,p.12 (DOB 05/06/1937); P3512,p.29 (DOB 05/06/1937); see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Džemal	Nail	08/02/1958	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.13; P3512,pp.34-3; P4881,pp.2-3; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Emsud	Hilimija	07/10/1966	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85 (FaN Hilmo); P4878,p.12; P3512,pp.18-19; P4881,pp.62-63; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Esmin	Mehmed	30/10/1970	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.32; P4881,pp.136-137; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Fadil	Vahid	12/09/1959	Male	REDACTED; P3637 p.11; REDACTED; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,pp.29-30; P4881,pp.116-117; see also A.MAŠOVIĆ:P4850,pp.43,45

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
DRAGANOVIĆ	Fehret	Ago	04/04/1955	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.21 (FaN Aga); P4881,pp.18-19; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Hamdija	Ramiz	29/10/1970	Male	REDACTED; P3637 p.11 (DOB 1950); A.MAŠOVIĆ:P4853, p.85; P4878,p.13; P3512,p.38; P4881,pp.48-49; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Hilmo	Ibro	23/06/1935	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12 (DOB 23/03/1934); P3512,p.28 (DOB 23/03/1934); see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Hilmo	Hilmo	13/05/1964	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12 (DOB 30/05/1964); P3512,p.22 (DOB 30/05/1964); P4881,pp.78-79; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Mesud	Hilmija	09/07/1972	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85 (FaN Hilmo); P4878,p.12; P3512,pp.28-29; P4881,pp.112-113; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Nijaz	Nail	21/04/1961	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,pp.22-23; P4881,pp.80-81; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Ramiz	Ago	01/06/1950	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,pp.17-18; P4881,pp.60-61; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Safet	Adem	30/08/1970	Male	REDACTED; P3637 p.12 (FN Safer); REDACTED; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,pp.12-13; P4881,pp.22-23; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Rufad	Adem	29/05/1965	Male	REDACTED; P3637 p.12 (DOB 1970); REDACTED; A.MAŠOVIĆ:P4853, p.85; P4878,p.13; P3512,p.39; P4881,pp.128-129; see also A.MAŠOVIĆ:P4850,pp.43,45
DRAGANOVIĆ	Teufik	Ago	01/01/1959	Male	P3637 p.11; A.MAŠOVIĆ:P4853, p.85 (DOB 1956); P4878,p.12 (DOB 11/06/1956); P3512,p.29 (FaN Ago, DOB 11/06/1956); P4881,pp.124-125 (DOB 1969); see also A.MAŠOVIĆ:P4850,pp.43,45
FAZLIĆ	Husein	Ajiz	05/01/1961	Male	REDACTED; P3637 p.11; REDACTED; A.MAŠOVIĆ:P4853, p.85; P4878,p.11 (FaN Aziz); P3512,p.11 (FaN Aiz); P4881,pp.14-15; see also A.MAŠOVIĆ:P4850,pp.43,45
GROMILIĆ	Emir	Hasib	09/10/1973	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.13 (DOB 1972); P3512,p.39 (DOB 1972); P4881,pp.72-73 (LN GRANLIĆ); see also A.MAŠOVIĆ:P4850,pp.43,45

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
HALILOVIĆ	Saim	Sabit	24/02/1964	Male	REDACTED; P3637 p.10 (FN Salem); A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.23; P4881,pp.84-85 (FN Sajim); see also A.MAŠOVIĆ:P4850,pp.43,45
HOTIĆ	Dževad	Ejub	02/09/1967	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12 (DOB 01/09/1967); P3512,p.27 (DOB 01/09/1967); P4881,pp.104-105; see also A.MAŠOVIĆ:P4850,pp.43,45
JUKIĆ	Ismet	Muharem	12/05/1941	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.85; P4878,p.13; P3512,p.40; P4881,pp.152-153; see also A.MAŠOVIĆ:P4850,pp.43,45
KERANOVIĆ	Asim	Husein	11/01/1959	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.16; P4881,p.42-43; see also A.MAŠOVIĆ:P4850,pp.43,45
KERANOVIĆ	Emir	Husejin	02/05/1966	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.18 (FaN Husein); P4881,pp.46-47; see also A.MAŠOVIĆ:P4850,pp.43,45
KERANOVIĆ	Enes	Husein	11/06/1963	Male	REDACTED; A.MAŠOVIĆ:P4853,p.7; P4880,pp.11-12 (DOB 01/06/1963); see also A.MAŠOVIĆ:P4850,p.44
KERANOVIĆ	Jasmin	Husejin	29/12/1968	Male	REDACTED; P3637 p.11 (DOB 1956); A.MAŠOVIĆ:P4853, p.85 (FaN Husein); P4878,p.13 (FaN Husein, DOB 1959); P3512,p.34 (FaN Husein, DOB 1969); P4881,pp.146-147 (DOB 1965); see also A.MAŠOVIĆ:P4850,pp.43,45
KUJUNDŽIĆ	Derviš	Mumin	05/04/1937	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,pp.20-21; P4881,pp.68-69; see also A.MAŠOVIĆ:P4850,pp.43,45
MUHELJIĆ	Adem	Dedo	11/08/1951	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.21; P4881,pp.76-77; see also A.MAŠOVIĆ:P4850,pp.43,45
MUHELJIĆ	Dedo	Derviš	03/05/1932	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12 (FaN Mumin); P3512,p.17; P4881,pp.58-59; see also A.MAŠOVIĆ:P4850,pp.43,45
MURATOVIĆ	Ibrahim	Nurija	06/03/1930	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.27; P4881,pp.102-103; see also A.MAŠOVIĆ:P4850,pp.43,45
NEZIĆ	Atif	Husein	16/05/1972	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.12; see also A.MAŠOVIĆ:P4850,pp.43,45
NEZIĆ	Husein	Mumin	19/11/1937	Male	REDACTED; P3637 p.11 (DOB 1936); A.MAŠOVIĆ:P4853, p.85; P4878,p.12 (DOB 1936); P3512,p.17 (DOB 1936); P4881,pp.54-55 (DOB 1934); see also A.MAŠOVIĆ:P4850,pp.43,45

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
NEZIĆ	Islam	Meho	15/03/1929	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,pp.27-28; P4881,pp.108-109; see also A.MAŠOVIĆ:P4850,pp.43,45
NEZIĆ	Nijaz	Husein	08/09/1969	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.25; P4881,pp.92-93 (LN NEDIĆ); see also A.MAŠOVIĆ:P4850,pp.43,45
NEZIĆ	Rezak	Safeta	13/07/1969	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85 (FaN Safet); P4878,p.11 (FaN Safet); P3512,p.10 (FaN Safet); see also A.MAŠOVIĆ:P4850,pp.43,45
NEZIĆ	Safet	Mumin	18/12/1939	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.13; P3512,pp.38-39; see also A.MAŠOVIĆ:P4850,pp.43,45
ZEČEVIĆ	Esad	Ćamil	10/12/1953	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.11; P3512,pp.10-11; P4881,p.8-9; see also A.MAŠOVIĆ:P4850,pp.43,45
ZEČEVIĆ	Omer	Ćamil	01/07/1950	Male	REDACTED; P3637 p.11; A.MAŠOVIĆ:P4853, p.85; P4878,p.12; P3512,p.24; P4881,pp.86-87; see also A.MAŠOVIĆ:P4850,pp.43,45
ZUKIĆ	Denis	Ferid	05/07/1973	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.85; P4878,p.1; P3512,pp.9-10; P4881,pp.4-5; see also A.MAŠOVIĆ:P4850,pp.43,45
ZUKIĆ	Faik	Muharem	03/09/1939	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.86; P4878,p.12; P3512,p.22; P4881,pp.74-75; see also A.MAŠOVIĆ:P4850,pp.43,45
ZUKIĆ	Hasan	Rešid	01/04/1967	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.86; P4878,p.12; P3512,pp.8,14-15; P4881,pp.32-33; see also A.MAŠOVIĆ:P4850,pp.43,45
ZUKIĆ	Ramiz	Muharem	30/10/1940	Male	REDACTED; P3637 p.10; A.MAŠOVIĆ:P4853, p.86; P4878,p.12; P3512,p.25; P4881,pp.90-91 (FN Hamid); see also A.MAŠOVIĆ:P4850,pp.43,45
Novi Grad B.12.1					
BRAJLOVIĆ	EDIN	EJUB	22/09/1963	Male	KDZ041.T.12124; REDACTED; A.MAŠOVIĆ:P4853,p.86; P4883,p.45; P4884,pp.8,19; P4885,pp.33-34; see also A.MAŠOVIĆ:P4850,pp.45-47
BRAJLOVIĆ	ZAJKO	RAŠID	02/01/1939	Male	REDACTED; A.MAŠOVIĆ:P4853,p.86; P4884,pp.9,20,41; see also A.MAŠOVIĆ:P4850,p.46
BRAJLOVIĆ	ZUJAD	ZAJKO	02/10/1962	Male	REDACTED; A.MAŠOVIĆ:P4853,p.86; P4883,p.45; P4884,pp.9,20,41; P4885,p.38; see also A.MAŠOVIĆ:P4850,pp.45-47
CELIK	Enver			Male	KDZ041.T.12070
DELIC	Hajro			Male	REDACTED; KDZ041.T.12069-12070

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EFENDIĆ	DŽEMAL	ZAHID	05/10/1958	Male	A.MAŠOVIĆ:P4853,p.86; P4883,p.45; P4884,pp.9,20,42; P4885,pp.38-39; see also A.MAŠOVIĆ:P4850,pp.45-46
LNU	Amir			Male	REDACTED;
PAŠIĆ	RUSMIR	SAFET	02/04/1969	Male	REDACTED; A.MAŠOVIĆ:P4853,p.87; P4883,p.45; P4884,pp.9,19; P4885,p.36; see also A.MAŠOVIĆ:P4850,pp.45-47
RAMADANI	KADRIJA	ČAZIM	13/05/1933	Male	REDACTED; A.MAŠOVIĆ:P4853,p.87; P4883,p.45; P4884,pp.9,19,41; P4885,p.37; see also A.MAŠOVIĆ:P4850,pp.45-47
Novi Grad B.12.2					
BEŠIĆ	ŠUĆRIJA	RAMO	16/06/1949	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.34 (FaN Rama); see also A.MAŠOVIĆ:P4850,pp.45-46
BEŠIĆ	EDIN	SADRIRA	22/07/1971	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88 (FaN Šaćir); P4883,p.32 (FaN Šućra, DOB 05/08/1971); see also A.MAŠOVIĆ:P4850,pp.45-46
BEČIĆ	SALEM	RASIM	10/01/1945	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
BEČKOVIĆ	AHMILO	AHMET	30/03/1967	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
DURAKOVIĆ	AMIR	ŠERIF	30/01/1960	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88
GAČANOVIĆ	ČAZIM	MULO	06/04/1955	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.34 (FaN Mujo); see also A.MAŠOVIĆ:P4850,pp.45-46
GAČANOVIĆ	ALJA	MULO	01/01/1949	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
GAČANOVIĆ	MUFID	ASIM	11/11/1968	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
GAČANOVIĆ	MUJO	ABID	05/02/1920	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88 (DOB 1929); P4883,p.34 (DOB 1929); see also A.MAŠOVIĆ:P4850,pp.45-46
GAČANOVIĆ	MUSTAFA	ATIF	22/11/1959	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
GAČANOVIĆ	NEDŽIB	ATIF	04/07/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
HRUSTANOVIĆ	SAMIR	OSMAN	17/12/1966	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
KALKAN	EJUB	NURJA	15/02/1935	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
MUHAREMOVIĆ	MIDHAT	MURAT	02/10/1958	Male	REDACTED; A.MAŠOVIĆ:P4853,p.88; P4883,p.32 (FN Fikret); see also A.MAŠOVIĆ:P4850,pp.45-46

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MUJKIĆ	ŠAČIR	HEMED	27/07/1963	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	Almir			Male	REDACTED; A.MAŠOVIĆ:P4853.p.88 (FN Armin, FaN Ragib, DOB 1968); P4883,p.32 (FN Armin, FaN Ragib); see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	ELDIN	REFIK	12/04/1974	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.33 (DOB 14/04/1964); see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	EMIR (Edmir)	SALKO	23/02/1973	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	FIKRET	SULJO	27/07/1956	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.33 (FaN Sulejman); see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	Mehmed			Male	REDACTED; A.MAŠOVIĆ:P4853.p.88 (FN Hemed, FaN Alija, DOB 1936)
MUJKIĆ	MIRSAD	MEHMED	30/05/1958	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.33 (FaN Hamed); see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	MUHAMED	ŠERIF	18/02/1949	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.32; see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	Nazif			Male	REDACTED;
MUJKIĆ	REFIK	NURKO	15/04/1952	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	SALEM	AVDO	01/01/1952	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.34 (DOB 15/12/1952); see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	UZEIR	AHMED	05/05/1935	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
MUJKIĆ	ZIJAD	MUHAMED	07/06/1973	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.32; see also A.MAŠOVIĆ:P4850,pp.45-46
NOVALIJA	RAMIZ	BAJRO	11/07/1946	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.32; see also A.MAŠOVIĆ:P4850,pp.45-46
PAŠIĆ	Meho			Male	REDACTED; A.MAŠOVIĆ:P4853.p.88 (LN BAŠIĆ, FaN Omer, DOB 1944); P4883,p.33 (LN BAŠIĆ, FaN Omer, DOB 26/01/1944); see also A.MAŠOVIĆ:P4850,pp.45-46
RIZVANOVIĆ	Ismet	Ibro	10/11/1958	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
RIZVANOVIĆ	Nedžad	Ejub	01/01/1972	Male	REDACTED; A.MAŠOVIĆ:P4853.p.88; P4883,p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
RIZVANOVIĆ	Sulejman	Halim	15/06/1945	Male	REDACTED; A.MAŠOVIĆ:P4853.p.89; P4883,p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
RIZVAN	Vahid			Male	REDACTED;

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
RIZVANOVIĆ	Safet			Male	REDACTED; KDZ041:T.12114
SULJIĆ	ENES	JUSUF	22/09/1950	Male	REDACTED; A.MAŠOVIĆ:P4853.p.89; P4883.p.33; see also A.MAŠOVIĆ:P4850,pp.45-46
SULJIĆ	ENVER	JUSUF	04/02/1952	Male	REDACTED; A.MAŠOVIĆ:P4853.p.89; P4883.p.32; see also A.MAŠOVIĆ:P4850,pp.45-46
SULJIĆ	Muhamed	Mahmut	01/01/1936	Male	REDACTED; A.MAŠOVIĆ:P4853.p.89; P4883.p.33 (FN Mehmed); see also A.MAŠOVIĆ:P4850,pp.45-46
SULJIĆ	SALIH	JUSUF	24/04/1934	Male	REDACTED; A.MAŠOVIĆ:P4853.p.89; P4883.p.33 (DOB 18/04/1934); see also A.MAŠOVIĆ:P4850,pp.45-46
SULJIĆ	SUAD	MUHAMED	14/05/1972	Male	REDACTED; A.MAŠOVIĆ:P4853.p.89; P4883.p.34; see also A.MAŠOVIĆ:P4850,pp.45-46
TIRO	Nijaz			Male	REDACTED;
Iliđža B.13.1					
SALČINOVIĆ	Zlatan			Male	M.SMAJS:P43,p.5 ; A.MAŠOVIĆ:P4853.p.89 (LN SALČIN, FaN Todor, DOB 1955)
LNU	FNU			Male	M.SMAJS:P43,p.5
Iliđža B.13.3					
GAČANOVIĆ	VAHID	MUHAMED	04/06/1942	Male	KDZ542:P161.p.3; A.MAŠOVIĆ:P4853.p.90; P4886.p.40; see also A.MAŠOVIĆ:P4850,p.47
NIZIĆ	Zido			Male	KDZ542:P161.p.3 ; A.MAŠOVIĆ:P4853.p.91 (LN ISIĆ, FN Mehmed-z. v.Zido, FaN Atif, DOB 1945)
SMAJIĆ	Ramiz	Hasan	01/01/1946	Male	KDZ542:P161.p.3; A.MAŠOVIĆ:P4853.p.90; see also P4886 and A.MAŠOVIĆ:P4850,p.47
Pale B.14.1					
HRVO	Fehim			Male	H.KARIĆ:P2839,para.42; see also S.CRNČALO:P733,para.59
JAŠAREVIĆ	Izet	Ibro	10/04/1921	Male	H.KARIĆ:P2839,para.42; see also S.CRNČALO:P733,para.60
JUSUFOVIĆ	Alija	Edhem	03/08/1930	Male	H.KARIĆ:P2839,paras.37-39; H.KARIĆ:T.15303-15305; see also S.CRNČALO:P733,para.60
PANDŽIĆ	Selim	Alija	29/09/1929	Male	P4416
PANDŽIĆ	Smail			Male	H.KARIĆ:P2839,paras.37-39; H.KARIĆ:T.15303,15305
SMAJIĆ	Nasko			Male	H.KARIĆ:P2839,paras.37-40; H.KARIĆ:T.15303-15305,15373; see also S.CRNČALO:P733,para.60
Prijedor B.15.1					
ŽERIĆ	Sead	Meho	04/05/1955	Male	REDACTED; A.MAŠOVIĆ:P4853.p.23; see also A.MAŠOVIĆ:4850.p.49 and P4893
ČAUŠEVIĆ	Besim	Haso	20/04/1941		REDACTED; A.MAŠOVIĆ:P4853.p.25; see also A.MAŠOVIĆ:4850.p.49 and P4893

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
ČAUŠEVIĆ	ENVER	Alija	15/05/1950	Male	REDACTED; A.MAŠOVIĆ:P4853.p.25; P5909,p.35 (FaN Ale); see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
ČAUŠEVIĆ	Fikret		24/03/1962		REDACTED;
ČAUŠEVIĆ	Hamed		15/02/1965		REDACTED;
ČAUŠEVIĆ	Mehmed	Hamed	10/06/1937		REDACTED; A.MAŠOVIĆ:P4853.p.25; P5909,pp.35-36; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
ČAUŠEVIĆ	Mirhad	Ćamil	21/05/1958	Male	REDACTED; A.MAŠOVIĆ:P4853.p.25; P5909,p.8; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
ČAUŠEVIĆ	Muharem	Rašid	21/03/1936		REDACTED; A.MAŠOVIĆ:P4853.p.25; see also A.MAŠOVIĆ:4850,p.49 and P4893
ČAUŠEVIĆ	Nihad	Ćamil	17/06/1964	Male	P4409,pp.5-6
ČAUŠEVIĆ	Said	Huzeir	22/07/1968		REDACTED; A.MAŠOVIĆ:P4853.p.25; P5909,p.8, (DOB 02/07/1968); see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
ALIŠKOVIĆ	Adil	Osman	12/04/1963		REDACTED; A.MAŠOVIĆ:P4853.p.34
ALIŠKOVIĆ	EMSUD	ABDULAH	29/01/1953	Male	REDACTED; A.MAŠOVIĆ:P4853.p.23; P5909,p.3; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
ALIŠKOVIĆ	Esad		07/01/1967		REDACTED;
ALIŠKOVIĆ	Fuad	Smail	28/06/1967	Male	REDACTED; A.MAŠOVIĆ:P4853.p.23; see also A.MAŠOVIĆ:4850,p.49 and P4893
ALIŠKOVIĆ	HALID		26/09/1960		REDACTED;
ALIŠKOVIĆ	HALID	SMAIL	05/01/1960	Male	REDACTED; A.MAŠOVIĆ:P4853.p.23; see also A.MAŠOVIĆ:4850,p.49 and P4893
ALIŠKOVIĆ	IZET	RASIM	09/01/1958	Male	P4409,pp.3-4; A.MAŠOVIĆ:P4853.p.23; see also A.MAŠOVIĆ:4850,p.49 and P4893
ALIŠKOVIĆ	JASIM	NAZIF	23/08/1954	Male	REDACTED; A.MAŠOVIĆ:P4853.p.23; P5909,p.4; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
ALIŠKOVIĆ	JUSUF	MUSTAFA	12/04/1935	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850,p.49 and P4893
ALIŠKOVIĆ	NAZMIJA	IDRIZ	22/05/1961	Male	P4409,pp.1-2; A.MAŠOVIĆ:P4853,p.16
ALIŠKOVIĆ	Nedžad		10/11/1968		REDACTED;
ALIŠKOVIĆ	Sejad	Osman	01/09/1971	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850,p.49 and P4893
ALIŠKOVIĆ	VAHID	NAZIF	02/03/1965	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850,p.49 and P4893
AVDIĆ	Damir	Sejfulah	16/11/1972	Male	REDACTED;
AVDIĆ	Fahrudin	Omer	12/10/1963	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850,p.49 and P4893
AVDIĆ	Fikret		14/01/1951		REDACTED;

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AVDIĆ	Nihad	Ahmet	18/07/1954	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850.p.49 and P4893
AVDIĆ	RIZAD	IBRAHIM	01/01/1961	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24; P5909.p.31; see also A.MAŠOVIĆ:4850.p.48-49 and P4893
AVDIĆ	Samir	Sejfulah	14/03/1969	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24 (FN Samer); see also A.MAŠOVIĆ:4850.p.49 and P4893
AVDIĆ	SEJFO	MEHMED	10/03/1947	Male	P4409.p.13-14; REDACTED; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850.p.49 and P4893
AVDIĆ	Senad		07/05/1962		REDACTED;
AVDIĆ	ZINAD	IBRAHIM	08/09/1967	Male	REDACTED; A.MAŠOVIĆ:P4853.p.34
BEHLIĆ	Munib		28/12/1947	Male	REDACTED; A.MAŠOVIĆ:P4853.p.17
BEHLIĆ	Redžep		19/05/1956	Male	REDACTED;
BILALOVIĆ	ŠABAN	OMER	27/06/1946	Male	REDACTED;
BILALOVIĆ	Dževad	Omer	09/04/1950	Male	P4409.p.47-48; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850.p.49 and P4893
BILALOVIĆ	ISMET	ŠABAN	26/04/1968	Male	P4409.p.45-46; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850.p.49 and P4893
BILALOVIĆ	Mehmed	Omer	07/03/1944	Male	A.MAŠOVIĆ:4850.p.49 and P4893
BILALOVIĆ	Mehmed	Omer	07/03/1944	Male	P4409.p.43-44; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850.p.49 and P4893
CRLJENKOVIĆ	DERVIŠ	MUJO	16/10/1942	Male	REDACTED; A.MAŠOVIĆ:P4853.p.25; see also A.MAŠOVIĆ:4850.p.49 and P4893
CRLJENKOVIĆ	Emir		01/01/1965	Male	REDACTED;
CRLJENKOVIĆ	Fikret		04/08/1967		REDACTED;
CRLJENKOVIĆ	Hasan	Mujo	15/09/1945	Male	REDACTED; A.MAŠOVIĆ:P4853.p.25; see also A.MAŠOVIĆ:4850.p.49 and P4893
CRLJENKOVIĆ	Mirsad	Hakija	17/11/1962	Male	REDACTED;
CRLJENKOVIĆ	Ramo	Omer	06/06/1955	Male	P4409.p.39-40; REDACTED;
CRLJENKOVIĆ	SAFET	DERVIŠ	18/02/1971	Male	REDACTED; A.MAŠOVIĆ:P4853.p.24; see also A.MAŠOVIĆ:4850.p.49 and P4893
CRLJENKOVIĆ	SALKO	HASO	15/11/1942	Male	P4409.p.41-42; REDACTED; A.MAŠOVIĆ:P4853.p.25; see also A.MAŠOVIĆ:4850.p.49 and P4893
DŽAMASTAGIĆ	Ferid	Jusuf	02/01/1960	Male	P4409.p.37-38; A.MAŠOVIĆ:P4853.p.26; see also A.MAŠOVIĆ:4850.p.49 and P4893
DŽAMASTAGIĆ	Ilijaz	Ibrahim	12/05/1954		REDACTED; A.MAŠOVIĆ:P4853.p.34
DŽOLIĆ	HUSEIN	MUHAREM	27/09/1958	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.26; see also A.MAŠOVIĆ:4850.p.49 and P4893
DURATOVIĆ	Emin	Hilimija	05/02/1956	Male	P4409.p.35-36 (FaN Hilimo)

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DURATOVIĆ	HASIB	HASIB	02/03/1951	Male	P4409,pp.62-63; A.MAŠOVIĆ:P4853.p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
DURATOVIĆ	Kasim	Hilimija	17/09/1953	Male	REDACTED; P4409,pp.60-61 (FaN Hilimo); REDACTED; A.MAŠOVIĆ:P4853,p.18
DURATOVIĆ	RAMO	JASIM	02/03/1951	Male	P4409,pp.58-59 (DOB 01/07/1951); A.MAŠOVIĆ:P4853.p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
DURATOVIĆ	Sead	Derviš	16/06/1969	Male	REDACTED; A.MAŠOVIĆ:P4853.p.26; P5909,p.9; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
DURATOVIĆ	Senad	Derviš	25/05/1968	Male	P4409,pp.7-8; REDACTED; A.MAŠOVIĆ:P4853,p.18
FAZLIĆ	Džemal	Smail	08/04/1949	Male	P4409,pp.23-24 (FaN Smajo); A.MAŠOVIĆ:P4853,p.26; P5909,p.10; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
FAZLIĆ	BESIM	MUSTAFA (Mujo)	08/07/1952	Male	REDACTED; A.MAŠOVIĆ:P4853.p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
FAZLIĆ	Fadil	Salih	12/08/1947	Male	REDACTED; A.MAŠOVIĆ:P4853.p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
FAZLIĆ	Fuad	Smail	03/04/1967	Male	REDACTED;
FAZLIĆ	Kasim	Mujo	31/01/1943	Male	REDACTED; A.MAŠOVIĆ:P4853.p.26; P5909,p.10; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
FAZLIĆ	Kemal	Smail	10/06/1957	Male	P4409,pp.29-30 (FaN Smajo); A.MAŠOVIĆ:P4853.p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
FAZLIĆ	Nihad	Ahmet	22/04/1955	Male	REDACTED; A.MAŠOVIĆ:P4853,p.34
FAZLIĆ	Sejad		10/02/1962	Male	REDACTED;
FIKIĆ	Husein	Hakija	05/03/1962	Male	REDACTED; REDACTED; N.SEBIRE:P694,p.187; A.MAŠOVIĆ:P4853,p.18; P4892,p.1; see also A.MAŠOVIĆ:P4850,p.49
HAMULIĆ	Fadil	Mehmed	31/10/1953	Male	REDACTED; P4409,pp.27-28; A.MAŠOVIĆ:P4853,p.27; see also A.MAŠOVIĆ:4850,p.49 and P4893
HAMULIĆ	Muhamed	Atif	31/03/1965		REDACTED; A.MAŠOVIĆ:P4853.p.27; P5909,pp.11-12; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
HAMULIĆ	Mehmed		04/04/1967		REDACTED;
HAMULIĆ	Razim	Adem	10/11/1961	Male	REDACTED; A.MAŠOVIĆ:P4853,p.19
HERGIĆ	Besim	Ahmet	24/12/1954		REDACTED; A.MAŠOVIĆ:P4853.p.27; P5909,p.43; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
HODŽIĆ	Jasim	Mujo	12/01/1942		REDACTED; A.MAŠOVIĆ:P4853.p.27; see also A.MAŠOVIĆ:4850,p.49 and P4893
HOPOVAC	Aziz		27/06/1967	Male	REDACTED;
HOPOVAC	Hamed		18/05/1953		REDACTED;

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HORIĆ	Edin	Vahid	17/02/1964		REDACTED; A.MAŠOVIĆ:P4853.p.27; see also A.MAŠOVIĆ:4850.p.49 and P4893
HUSKIĆ	Ibro	Osman	10/01/1934	Male	REDACTED; A.MAŠOVIĆ:P4853.p.27; P5909,pp.12-13; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
KADIRIĆ	Mirhet	Abdulah	23/03/1964	Male	REDACTED;
KADIRIĆ	Mirzet		25/02/1962		REDACTED;
KARAGIĆ	SULEJMAN	HASAN	28/02/1937	Male	REDACTED; A.MAŠOVIĆ:P4853.p.28; P5909,pp.49-50; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
KARAHODŽIĆ	Husein	Fehim	25/03/1954	Male	P4409,pp.15-16; A.MAŠOVIĆ:P4853.p.28; see also A.MAŠOVIĆ:4850,p.49 and P4893
KARUPOVIĆ	Emir	Avdo	17/10/1967		REDACTED; A.MAŠOVIĆ:P4853.p.28; see also A.MAŠOVIĆ:4850,p.49 and P4893
KARUPOVIĆ	Ismet	Taib	13/03/1962	Male	P4409,pp.11-12; A.MAŠOVIĆ:P4853.p.20
KARUPOVIĆ	Mesud	Taib	02/01/1959	Male	P4409,pp.9-10; A.MAŠOVIĆ:P4853.p.41
KLJAJIĆ	Aziz	Latif	10/11/1935		REDACTED; A.MAŠOVIĆ:P4853.p.28; P5909,p.51; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
KLJAJIĆ	Fehim	Meho	22/11/1937		REDACTED; A.MAŠOVIĆ:P4853.p.28; see also A.MAŠOVIĆ:4850,p.49 and P4893
KLJAJIĆ	Latif	šerif	15/03/1953		REDACTED; A.MAŠOVIĆ:P4853.p.28; P5909,p.16; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
MEDIĆ	Fikret	Hasan	16/03/1958	Male	REDACTED; REDACTED;
MUHIĆ	Čamil	Salko	09/12/1936	Male	REDACTED; A.MAŠOVIĆ:P4853.p.29; see also A.MAŠOVIĆ:4850,p.49 and P4893
MUHIĆ	Asim	Mehmed	12/03/1958		REDACTED; A.MAŠOVIĆ:P4853.p.29; P5909,p.57; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
MUIJADŽIĆ	Džemal	Redžo	16/06/1943	Male	REDACTED; A.MAŠOVIĆ:P4853.p.30; P5909,p.58; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
MUIJADŽIĆ	Čazim	Kasim	15/10/1969	Male	P4409,pp.21-22; A.MAŠOVIĆ:P4853.p.30; see also A.MAŠOVIĆ:4850,p.49 and P4893
MUIJADŽIĆ	Asim	Kasim	10/08/1967	Male	P4409,pp.19-20; A.MAŠOVIĆ:P4853.p.30; see also A.MAŠOVIĆ:4850,p.49 and P4893
MUIJADŽIĆ	Kasim	Mehmed	10/05/1940	Male	P4409,pp.17-18; A.MAŠOVIĆ:P4853.p.30; see also A.MAŠOVIĆ:4850,p.49 and P4893
MUIJADŽIĆ	Mirsad	Jasim	26/01/1963		REDACTED; A.MAŠOVIĆ:P4853.p.30; P5909,p.19; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
MUIJADŽIĆ	Jasim	Huso	04/04/1952		REDACTED; A.MAŠOVIĆ:P4853.p.30; P5909,p.20; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893

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NASIĆ	Emsud	Mehmed	03/02/1958	Male	REDACTED; A.MAŠOVIĆ:P4853.p.30; see also A.MAŠOVIĆ:4850.p.49 and P4893
RAMČEVSKI	Rifet	Hasib	31/03/1954	Male	P4409,pp.56-57; A.MAŠOVIĆ:P4853.p.31; see also A.MAŠOVIĆ:4850.p.49 and P4893
RAMČILOVIĆ	SULEJMAN	SMAJO	15/01/1939	Male	P4409,pp.51-52; REDACTED; A.MAŠOVIĆ:P4853.p.34
RAMULIĆ	Dževad	Nail	02/05/1948	Male	P4409,pp.52-53; A.MAŠOVIĆ:P4853.p.31; see also A.MAŠOVIĆ:4850.p.49 and P4893
RAMULIĆ	Mustafa	Jasim	06/07/1972	Male	P4409,pp.49-50; A.MAŠOVIĆ:P4853.p.31; see also A.MAŠOVIĆ:4850.p.49 and P4893
RAMULIĆ	Nedžad	Ibrahim	27/02/1962	Male	REDACTED; A.MAŠOVIĆ:P4853.p.31; P5909,pp.22-23; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
REDŽIĆ	İrfad		14/06/1961		REDACTED; A.MAŠOVIĆ:P4853.p.31 (FN İrfan); see also A.MAŠOVIĆ:4850,p.49 and P4893
SADIĆ	ASMIR	ALİJA	14/06/1970	Male	P4409,pp.33-34; A.MAŠOVIĆ:P4853.p.31; see also A.MAŠOVIĆ:4850,p.49 and P4893
SELIMOVIĆ	Sead	Hamed	09/03/1954	Male	P4409,pp.31-32; A.MAŠOVIĆ:P4853.p.41
SIKIRIĆ	Mehmedalija	Rasim	07/08/1946	Male	REDACTED; A.MAŠOVIĆ:P4853.p.31; see also A.MAŠOVIĆ:4850.p.49 and P4893
TOKMADŽIĆ	Drago			Male	REDACTED;
Prijedor B.15.2					
ŽERIĆ	Enes		10/01/1966		REDACTED;
ŠOLAJA	Miroslav	Mate	05/04/1936	Male	REDACTED; A.MAŠOVIĆ:P4853.p.39
ČEHAJIĆ	MUHAMED	OSMAN	01/11/1938	Male	REDACTED; KDZ074:P709.p.86; REDACTED; KDZ048:P678,p.56
ALIĆ	Bahrija	Asim	01/01/1956		REDACTED; A.MAŠOVIĆ:P4853.p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
ALIĆ	Besim	Muharem	01/01/1959		REDACTED; A.MAŠOVIĆ:P4853.p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
ALIĆ	Ekrem	Ramo	25/07/1951		REDACTED; N.SEBIRE:P694,p.42; A.MAŠOVIĆ:P4853,p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
ALIĆ	Eno			Male	KDZ048:P678,p.54
ALIĆ	ESAD	OSMAN	07/10/1954	Male	KDZ048:P678,p.55; A.MAŠOVIĆ:P4853,p.23; see also A.MAŠOVIĆ:4850,p.49 and P4893
ALIĆ	Meho				REDACTED;
ALIĆ	Muhamed	Hilimija	01/01/1963		REDACTED; A.MAŠOVIĆ:P4853.p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
ALIĆ	MUSTAFA	HUSEIN	15/03/1964	Male	REDACTED; A.MAŠOVIĆ:P4853.p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
ALIĆ	Smail	Husein	20/08/1962	Male	REDACTED; N.SEBIRE:P694,p.42

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ALJIĆ	Zijad	Asim	31/01/1960	Male	REDACTED;
ALJIĆ	Zilhad			Male	REDACTED;
ALIBEGOVIĆ	Alija			Male	REDACTED; A.MAŠOVIĆ:P4853,p.41
ALIHODŽIĆ	Vasif			Male	KDZ048:P678,p.177
ALISIĆ	Mirsad			Male	KDZ048:P678,p.56
ALSKOVIĆ	Aziz			Male	NusretSIVAC:P3478,p.232-233
ARAŠ	Ismet			Male	NusretSIVAC:P3478,p.84
ARIFAGIĆ	Dedo			Male	KDZ048:P678,p.177
ARIFAGIĆ	Hamdija			Male	KDZ048:P678,p.55
ATAROVIĆ	Ahmet			Male	NusretSIVAC:P3478,p.130
BAHONIJIĆ	Islam	Jakup	24/02/1952	Male	REDACTED; REDACTED; NusretSIVAC:P3478,pp.136,232-233; K.MEŠANOVIĆ:P3528,para.65; A.MAŠOVIĆ:P4853,p.37 (1951)
BALIĆ	Fadil	Hasan	01/01/64		REDACTED; A.MAŠOVIĆ:P4853,p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
BALIĆ	Hamdija	Ekrem	16/12/1952	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.24; see also A.MAŠOVIĆ:4850,p.49 and P4893
BALIĆ	Mahmud				REDACTED;
BARIŠIĆ	Joso	Srećko	12/02/1936	Male	REDACTED; A.MAŠOVIĆ:P4853,p.37
BARIŠIĆ	Vladimir	Ivo	15/03/1941	Male	REDACTED; A.MAŠOVIĆ:P4853,p.37
BEŠIREVIĆ	Mugbila				REDACTED;
BEŠIREVIĆ	Zlatan			Male	REDACTED; REDACTED; NusretSIVAC:P3478,p.135; A.MAŠOVIĆ:P4853,p.24 (FN Zlatko); see also A.MAŠOVIĆ:4850,p.49 and P4893
BEGIĆ	ENIZ	EMIN	03/05/1950	Male	NusretSIVAC:P3478,p.136 (FN Enes); K.MEŠANOVIĆ:P3528,paras.34,56,65; I.MERDŽANIĆ:T.21404; A.MAŠOVIĆ:P4853,p.24; P5909,p.5; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
BURAZEROVIĆ	MUHAMED	HUSNIJA	01/03/1945	Male	REDACTED; K.MEŠANOVIĆ:P3528,para.51; A.MAŠOVIĆ:P4853,p.25; P5909,p.7; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
BURAZOVIĆ	Ismail			Male	NusretSIVAC:P3478,p.130; A.MAŠOVIĆ:P4853,p.25 (LN BURAZEROVIĆ, FN Smail); see also A.MAŠOVIĆ:4850,p.49 and P4893
BURAZOVIĆ	Muhamed			Male	K.MEŠANOVIĆ:P3528,para.34
CERIĆ	Amir	Jusuf	08/05/1971	Male	REDACTED; REDACTED;
CIRKIĆ	FNU			Male	KDZ048:P678,pp.47-48
CRNALIĆ	Asmir			Male	REDACTED; NusretSIVAC:P3478,pp.82-83,179-184; NusretSIVAC:T.19641-19648

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CRNALIĆ	FNU	Ziko		Male	REDACTED;
CRNALIĆ	Mustafa	Hasan	04/05/1945	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.25; see also A.MAŠOVIĆ:4850.p.49 and P4893
CRNALIĆ	Ziko			Unknown	REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.25 (FN Zijad); see also A.MAŠOVIĆ:4850.p.49 and P4893
CRNKIĆ	Ešef	RAMO	24/06/1949	Male	REDACTED; REDACTED; M.MUJADZIĆ:P3703.p.168; M.MUJADZIĆ:T.20725-20726; A.MAŠOVIĆ:P4853.p.25 (FN Ešref); P5909,pp.34-35; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
CRNKIĆ	Husein	Ramo	09/09/1945	Male	REDACTED; REDACTED; M.MUJADZIĆ:P3703.p.168; M.MUJADZIĆ:T20725-20726; N.SEBIRE:P646 p.40; A.MAŠOVIĆ:P4853.p.38
DAUTOVIĆ	Edna	Uzeir	18/03/1969	Female	REDACTED; N.SEBIRE:P694,p.42, 177; Ž.MEJAKIĆ:T.44257-44258; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49; REDACTED
DAUTOVIĆ	Edvin	Uzeir	13/08/1965	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853.p.38
DAUTOVIĆ	Hare			Male	KDZ048:P678.p.54
DIDOVIĆ	Osman			Male	NusretSIVAC:P3478,p.232-233
DIHIĆ	Fahrudin				REDACTED;
DIHIĆ	Sabit				REDACTED;
DROBIĆ	Ilijaz	Salih	15/09/1944	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.38; P4892,p.3; see also A.MAŠOVIĆ:P4850,p.49
EJUPOVIĆ	Fadil	Emin	17/08/1956	Male	P4410,pp.27-30; REDACTED; REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.38
EJUPOVIĆ	Ismet	Husein	12/11/1950	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.38
EKINOVIĆ	Adnan	Omer	01/10/1962	Male	REDACTED; REDACTED; K.MEŠANOVIĆ:P3528,para.65; A.MAŠOVIĆ:P4853,p.38
EKINOVIĆ	Omer	Idriz	25/01/1937	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
ELKAZ	Mehemed				REDACTED;
ERGELIĆ	MUHAMED	SAFET	15/03/1945	Male	REDACTED; A.MAŠOVIĆ:P4853.p.18; P4892,p.1 (DOB 20/02/1945); see also A.MAŠOVIĆ:P4850,p.49
FAZLIĆ	Muhamed	Ismet	02/11/1957	Male	REDACTED; P4410,pp.31-32; A.MAŠOVIĆ:P4853,p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
FIKIĆ	Said			Male	REDACTED; REDACTED;
FORIĆ	Amir				REDACTED;

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FORIĆ	Adem	Taib	17/05/1972	Male	REDACTED; A.MAŠOVIĆ:P4853.p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
FORIĆ	Bahrija	Kadir	15/04/1945	Male	P4410,pp.33-34; A.MAŠOVIĆ:P4853.p.14; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
FORIĆ	Fuad				REDACTED;
FORIĆ	Hajro			Male	REDACTED;
FORIĆ	MEHMED	AHMET	05/01/1942	Male	REDACTED; A.MAŠOVIĆ:P4853.p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
FORIĆ	Munib	Muharem	25/01/1961	Male	REDACTED; A.MAŠOVIĆ:P4853.p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
FORIĆ	Said	Taib	25/01/1968	Male	REDACTED; A.MAŠOVIĆ:P4853.p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
FORIĆ	Samir	Taib	11/05/1970	Male	REDACTED; P4410,pp.35-36 (FN Samir); A.MAŠOVIĆ:P4853,p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
GANIĆ	Sulejman	Muharem	20/06/1933	Male	REDACTED; P4410,p.7-8; REDACTED; K.MEŠANOVIĆ:T.19841 (FNU)
GARIBOVIĆ	Džemal	Muharem	15/01/1951	Male	REDACTED; P4410,pp.1-4; REDACTED; A.MAŠOVIĆ:P4853,p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
GARIBOVIĆ	DERVIŠ	IBRO	24/06/1956	Male	P4413; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.18
GARIBOVIĆ	DŽEVAD	MUHAREM	24/01/1954	Male	REDACTED; P4410,pp.39-40; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.18
GARIBOVIĆ	ENES	TAHIR	31/08/1964	Male	REDACTED; P4410,pp.41-42; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.18
GARIBOVIĆ	FERID	SEJFO	17/04/1962	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.18
GARIBOVIĆ	Hamdija	Mustafa	20/06/1966	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
GARIBOVIĆ	Hasan			Male	REDACTED;
GARIBOVIĆ	HASIB	AVDO	02/01/1968	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
GARIBOVIĆ	Hilimija	Muharem	27/07/1967	Unknown	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.26; see also A.MAŠOVIĆ:4850,p.49 and P4893
GARIBOVIĆ	IRFAN	ABDULAH	12/10/1968	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.18
GARIBOVIĆ	Mirsad			Male	REDACTED;
GARIBOVIĆ	Sabit	Muharem	10/08/1970	Male	REDACTED; REDACTED; ; A.MAŠOVIĆ:P4853,p.18
GARIBOVIĆ	Senad	Muharem		Male	REDACTED;

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GARIBOVIĆ	SENAD	TAHIR	04/12/1962	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.27; P5909,p.41; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
GARIBOVIĆ	Suad		27/09/1956	Male	REDACTED;
GARIBOVIĆ	Suvad	Muharem		Male	REDACTED; REDACTED;
GARIBOVIĆ	Tahir	Meho	27/03/1939	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.38
GROZDANIĆ	DŽEVAD	Murat	06/01/1952	Male	REDACTED; P4410,pp.5-6; A.MAŠOVIĆ:P4853,p.27; see also A.MAŠOVIĆ:4850,p.49 and P4893
HABIBOVIĆ	Mahmut	Ibrahim	04/06/1934	Male	P4410,p.9-10; NusretSIVAC:P3478,p.89; A.MAŠOVIĆ:P4853,p.27; P5909,p.42; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
HADŽALIĆ	Rizah	Hajrudin	20/09/1952	Male	REDACTED; P4410,pp.11-12; REDACTED; REDACTED; K.MEŠANOVIĆ:T.19853-19854; A.MAŠOVIĆ:P4853,p.38
HADŽIĆ	Hajra			Female	REDACTED;
HARAMBAŠIĆ	Fikret	Hamed	01/11/1962	Male	REDACTED; A.MAŠOVIĆ:P4853,p.38 (FaN Muhamed)
HODŽIĆ	ISMET	ŠABAN	20/04/1959	Male	REDACTED; P4410,pp.13-14 (DOB 23/04/59); A.MAŠOVIĆ:P4853,p.40
HODŽIĆ	Mehmed			Male	KDZ048:P678,p.54
HODŽIĆ	ZILHAD	SULEJMAN	01/05/1956	Male	REDACTED; A.MAŠOVIĆ:P4853,p.19
HRNIĆ	Dalija	Jasmin	01/01/1947	Male	REDACTED; A.MAŠOVIĆ:P4853,p.38; P4892,p.3 (DOB 09/09/1947); see also A.MAŠOVIĆ:P4850,p.49
HRNIĆ	Jasmin	Mehmed	06/05/1963	Male	KDZ048:P678,p.54; A.MAŠOVIĆ:P4853,p.38
HRUSTIĆ	Đevad	Omer	01/01/1968		REDACTED; A.MAŠOVIĆ:P4853,p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
JAKUPOVIĆ	Idriz	Fehim	26/11/1946	Male	REDACTED; P4410,pp.15-18; REDACTED; KMEŠANOVIĆ:P3528,para.65; A.MAŠOVIĆ:P4853,p.27; see also A.MAŠOVIĆ:4850,p.49 and P4893
JAKUPOVIĆ	Iljaz			Male	REDACTED;
JAKUPOVIĆ	Mirsad			Male	REDACTED;
JASKIĆ	Fikret				REDACTED;
JAVOR	BAHRIJA	HAMDIIJA	04/07/1956	Unknown	REDACTED; A.MAŠOVIĆ:P4853,p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
JUKIĆ	Hamed			Male	REDACTED;
JUKIĆ	Mujo	Aziz	11/11/1952	Male	N.SEBIRE:P646,p.149,301; REDACTED; A.MAŠOVIĆ:P4853,p.20
KAHRIMANOVIĆ	MUHAREM	ALJJA	22/07/1935	Male	REDACTED; A.MAŠOVIĆ:P4853,p.28; P5909,p.49; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
KAHRIMANOVIĆ	Vasif			Male	KDZ048:P678,pp.54,176-177
KAPETANOVIĆ	Asaf	Halid	17/07/1955	Male	REDACTED; P4410,pp.19-20 (FN Asaf); REDACTED; A.MAŠOVIĆ:P4853,p.28 (FN Asaf); see also A.MAŠOVIĆ:4850,p.49 and P4893

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KAPETANOVIĆ	Burhanudin	Osman	25/02/1948	Male	REDACTED; REDACTED; NusretSIVAC:P3478,pp.138-140 (FN Burho); A.MAŠOVIĆ:P4853,p.28; P5909,p.15; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
KAPETANOVIĆ	MEHMEDALIJA	OSMAN	06/09/1944	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.28; P5909,p.16; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
KARABAŠIĆ	Emir	Hamdija	20/09/1961	Male	REDACTED; KDZ048:P678,p.54; A.MAŠOVIĆ:P4853,p.38
KARAGIĆ	Emir	Smail	08/01/1959	Male	REDACTED; A.MAŠOVIĆ:P4853,p.28; see also A.MAŠOVIĆ:4850,p.49 and P4893
KARDUM	GORDAN	ZDRAVKO	03/06/1958	Male	REDACTED; A.MAŠOVIĆ:P4853,p.28; P5909,p.50; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
KERENOVIĆ	Omer	Hamdija	29/11/1934	Male	REDACTED; REDACTED; NusretSIVAC:P3478,p.130; A.MAŠOVIĆ:P4853,p.28; see also A.MAŠOVIĆ:4850,p.49 and P4893
KESIĆ	Fahrudin	Šerif	01/01/1965	Male	REDACTED; A.MAŠOVIĆ:P4853,p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
KEVLJANIN	FNU			Male	KDZ048:P678,p.55
KODŽIĆ	Emir			Male	NusretSIVAC:P3478,p.84
KOMŠIĆ	Aleksandar			Male	REDACTED; REDACTED;
KRUPIĆ	Velid			Male	NusretSIVAC:P3478,p.232-233
LISIĆ	Mirzet			Male	NusretSIVAC:P3478,p.84
MAHMULJIN	Osman	Husein	21/01/1944	Male	REDACTED; REDACTED; NusretSIVAC:P3478,p.136; K.MEŠANOVIĆ:P3528,para.65
MAHMULJIN	VELIDA	FEHIM	26/11/1948	Female	REDACTED; REDACTED; KDZ048:P678,pp.58-59 (LNU); A.MAŠOVIĆ:P4853,p.41
MAHMULJIN	ZIJAD	IDRIZ	01/06/1939	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.29; P5909,p.54; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
MAHMUTOVIĆ	MEHO	MUSTAFA	05/08/1952	Male	REDACTED; NusretSIVAC:P3478,p.84; A.MAŠOVIĆ:P4853,p.29; P5909,p.55; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
MARIĆ	Stjepan	Nikola		Male	K.MEŠANOVIĆ:P3528,para.31; K.MEŠANOVIĆ:T.19849
MARIANOVIĆ	Omer			Male	REDACTED; NusretSIVAC:T.20382
MESIĆ	Halim	Halid	01/01/1967	Male	K.MEŠANOVIĆ:P3528,para.48; A.MAŠOVIĆ:P4853,p.28; see also A.MAŠOVIĆ:4850,p.49 and P4893
MEDUNJANIN	Becir	Hajro	03/06/1943	Male	REDACTED; Ž.MEJAKIĆ:T.44245; REDACTED; REDACTED; NusretSIVAC:P3478,p.232-233; KDZ048:P678,p.58

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MEDUNJANIN	Sadeta	Hasan	26/02/1944	Female	REDACTED; N.SEBIRE:P694,p.42 (FN Sureta), 177; Ž.MEJAKIĆ:T.44257-44258; REDACTED; REDACTED; REDACTED; K.MEŠANOVIĆ:P3528,para.25; KDZ048:P678,p.58 ; A.MAŠOVIĆ:P4853,p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49; REDACTED
MEDUNJANIN	Vehida				REDACTED;
MEHMEDAGIĆ	ESAD	MEHMED	11/04/1938	Male	REDACTED; REDACTED; NusretSIVAC:P3478,pp.83-84,130; REDACTED; NusretSIVAC:T.20382; K.MEŠANOVIĆ:P3528,para.65; A.MAŠOVIĆ:P4853,p.29; P5909,p.55; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
MELKIĆ	Ekrem			Male	KDZ048:P678,pp.54,176-177
MEMIĆ	Ilijaz			Male	NusretSIVAC:P3478,p.232-233
MONTIJAN	Ivica			Female	REDACTED;
MUŠIĆ	Ilijaz	Kasim	02/11/1951	Male	REDACTED;
MUJIDŽIĆ	Fikret			Male	REDACTED; REDACTED;
MUJAKIĆ	Fikret	Mehmed	01/01/1948	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.39
MUJKANOVIĆ	Abdulah	Meho	31/07/1943	Male	REDACTED; A.MAŠOVIĆ:P4853,p.39
MUJKANOVIĆ	Kadir	Sulejman	17/03/1943	Male	N.SEBIRE:P646,pp.36,39; REDACTED; A.MAŠOVIĆ:P4853,p.39
MUJKANOVIĆ	SENAD	OSMAN	01/12/1957	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.30; P5909,p.60; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
OKANOVIĆ	IBRAHIM	SULEJMAN	10/10/1950	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.30; P5909,p.62; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
PAŠIĆ	Jusuf	Camil	14/05/1935	Male	REDACTED; NusretSIVAC:P3478,p.136; K.MEŠANOVIĆ:P3528,para.65; KDZ048:P678,pp.55-56 ; A.MAŠOVIĆ:P4853,p.30; see also A.MAŠOVIĆ:4850,p.49 and P4893
PEHADŽIĆ	Alijha Alija	Izet	29/04/1957	Male	REDACTED; A.MAŠOVIĆ:P4853,p.31; see also A.MAŠOVIĆ:4850,p.49 and P4893
PEZO	ČAMIL	MUŠAN	09/04/1941	Male	P4410,pp.21-24; REDACTED; A.MAŠOVIĆ:P4853,p.31; see also A.MAŠOVIĆ:4850,p.49 and P4893
PUŠKAR	ABDULAH	DERVIŠ	01/01/1946	Male	REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.31; P5909,p.22; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
RAMADANOVIĆ	Safet	Hajro	12/10/1929	Male	REDACTED; Ž.MEJAKIĆ:T.44239; REDACTED; NusretSIVAC:P3478,p.89; K.MEŠANOVIĆ:T19841
RUSTIĆ	Mahmud				REDACTED;
SADIKOVIĆ	AGO	AHMET	24/08/1950	Male	NusretSIVAC:P3478,p.84; K.MEŠANOVIĆ:P3528,paras.56,65; A.MAŠOVIĆ:P4853,p.31; P5909,p.23; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893

Municipalities Victim List

<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
SARAJLIĆ	FIKRET	HUSNIJA	29/09/1952	Male	REDACTED; NusretSIVAC:P3478,pp.84,232-233; A.MAŠOVIĆ:P4853,p.31; P5909,pp.63-64; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
SARAJLIĆ	Mehmedalija	Aziz	10/05/1942	Male	REDACTED; REDACTED; REDACTED; K.MEŠANOVIĆ:P3528,paras.29,43; A.MAŠOVIĆ:P4853,p.39
SARAJLIĆ	Senad			Male	KDZ048:P678,p.55
SARIĆ	Silvije	Josip	01/01/1943	Male	REDACTED; NusretSIVAC:P3478,p.130; REDACTED; A.MAŠOVIĆ:P4853,p.39
SERIĆ ŠERIĆ	Nedžad	Halid	17/04/1936	Male	REDACTED; P4410,pp.37-38 (LN ŠERIĆ); REDACTED; NusretSIVAC:P3478,p.130; REDACTED; NusretSIVAC:T.20382; K.MEŠANOVIĆ:P3528,para.65
SIKORA	Željko	Ivan	09/10/1957	Male	NusretSIVAC:P3478,p.136; NusretSIVAC:T.19529-19530; K.MEŠANOVIĆ:P3528,para.65; M.MUJADŽIĆ:P3703,p.321; M.MUJADŽIĆ:T.20691; A.MAŠOVIĆ:P4853,p.22
SIVAC	Šefik	Rasid	10/10/1949	Male	REDACTED; KDZ048:P678,pp.54-55; A.MAŠOVIĆ:P4853,p.39
SULJANOVIĆ	RUFAD	VEJSIL	29/01/1961	Male	REDACTED; REDACTED; NusretSIVAC:P3478,p.136 (FN Rufat); K.MEŠANOVIĆ:P3528,para.65; A.MAŠOVIĆ:P4853,p.31; P5909,p.65; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
TADŽIĆ	Huse Husein	Teufik	15/08/1947	Male	REDACTED; A.MAŠOVIĆ:P4853,p.22
TADŽIĆ	MUSTAFA	IBRAHIM	02/01/1945	Male	REDACTED; REDACTED; NusretSIVAC:P3478,p.232-233 (FN Muta); A.MAŠOVIĆ:P4853,p.32; P5909,p.66; see also A.MAŠOVIĆ:4850,pp.48-49 and P4893
TARAS	Ismet			Male	KDZ048:P678,p.55
TARIĆ	Ismet			Male	NusretSIVAC:P3478,p.232-233
TERSIĆ	Mirsad	Šaban	01/01/1967		REDACTED; A.MAŠOVIĆ:P4853,p.15 (LN Terzić); see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
TAZEROVIĆ	FNU			Female	REDACTED;
TOKMADŽIĆ	Drago			Male	NusretSIVAC:P3478,p.232-233
TURSIĆ	Mehmed	Hamed Ahmed	18/07/1953	Male	REDACTED; P4410,pp.25-26 (DOB 08/07/1953, FaN Ahmet); REDACTED; A.MAŠOVIĆ:P4853,p.32; see also A.MAŠOVIĆ:4850,p.49 and P4893
VELIĆ	Meho	Jusuf	25/07/1970	Male	REDACTED;
VELIĆ	Miralem	Jusuf	01/01/1965		REDACTED; A.MAŠOVIĆ:P4853,p.15; see also P4890, P4891 and A.MAŠOVIĆ:P4850,pp.48-49
ZGOG	Bajram		12/08/1954	Male	REDACTED; REDACTED;
Prijedor B.15.3					

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
ŠEHIĆ	Mirhad	Abdulah	25/07/1960	Male	REDACTED; P4887,pp.2,8 (FaN Avdo); see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.44
ŠVRAKA	Mustafa	Mustafa	01/02/1954	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44
ĆEMAN	Rasim	Mehmed	30/10/1937		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
AVDIĆ	Ismet	Bektas	31/08/1964	Male	P4887,p.2; P4414; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
AVDIĆ	Senad	Reuf	05/07/1962	Male	REDACTED; P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.42
BAŠIĆ	Hasan	Ibrahim	18/06/1949	Male	REDACTED; P4887,pp.2,8 (FaN Ibro); see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
BEHLIĆ	Adem	Ahmet	15/09/1947	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.42
BEHLIĆ	Hasan	Omer	25/02/1960	Male	KDZ050:P1949
BRDAR	Adam	Latif	16/06/1957	Male	REDACTED; P4887,pp.2,8 (FN Adem, FaN Atif, DOB 16/06/1951); see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.42
BRDAR	Smail	Mehmed	10/11/1971	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
BRDAR	Ziko	Hasib	31/03/1961	Male	P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
BRKIĆ	Ferid	Ibrahim	11/09/1961	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
BRKIĆ	Suljo				REDACTED;
CRLJENKOVIĆ	Nurija	Husein	13/06/1955	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
DŽANANOVIĆ	Suljo	Hakija	10/06/1952		REDACTED; P4887,pp.2,8 (LN DŽANOVIĆ); see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
DŽANANOVIĆ	Senad	Hakija	01/05/1966		REDACTED; P4887,pp.2,8 (FaN Safija); see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
DEMIROVIĆ	Refik	Husein	27/07/1949	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42 (FaN Huse)
DIZDAREVIĆ	Ibrahim	Salih	18/03/1964	Male	REDACTED; P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.42
DIZDAREVIĆ	Mustafa	Salih	18/03/1959	Male	REDACTED; P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.42

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
DRAČIĆ	Omer	Salko	28/06/1930		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
DURATOVIĆ	Mirsad	Esad	28/04/1958	Male	P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; N.SEBIRE:P646 p.109; A.MAŠOVIĆ:P4853,p.42
FERHATOVIĆ	Šefik	Ešref	15/04/1968		REDACTED; P4887,pp.2,8 (FaN Ešef); see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
FERIZI	Numija	Emrul	15/08/1948		REDACTED; P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42 (FN Nuhija, DOB 1949)
FERIZI	Albin	Nuhija	05/05/1971		REDACTED; P4887,pp.2,8 (DOB 05/06/1971); see also A.MAŠOVIĆ:P4850,pp.47-48
FERIZOVIĆ	Armin	Besim	01/01/1972		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
FERIZOVIĆ	Nerhin				REDACTED;
GAVRANOVIĆ	Ante	Ivo	08/07/1956	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
HAMULIĆ	Mehmed	Redžo	22/10/1955		REDACTED; P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.42
HOPOVAC	Fikret	Hamza	07/05/1970	Male	P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43
HOPOVAC	Mesud	Kasim	01/01/1962	Male	P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43
HOPOVAC	Miralem	Ćamil	25/10/1940	Male	REDACTED; P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43
HOPOVAC	Raif	Agan	01/01/1942	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
HOPOVAC	Rejhan	Miralem	10/08/1964	Male	REDACTED; P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43
HUJIĆ	Bajro				REDACTED;
HUJIĆ	Huskan			Male	REDACTED;
HUJIĆ	Meho	Idriz	05/04/1962	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
ISLAMOVIĆ	Esad	Meho	01/01/1952	Male	P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
KADIĆ	Ermin	Mehmedalija	10/06/1968	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
KAHTERAN	Šefik	Ejub	01/08/1957		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
KALENDER	Ibro				REDACTED;

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
KARUPOVIĆ	Adem	Mehmed	29/07/1953	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43 (FaN Meho)
KARUPOVIĆ	Osman	Bajro	14/11/1946	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43
KARUPOVIĆ	Redžep	Šaban	20/01/1959	Male	KDZ050:P1949; REDACTED;
KARUPOVIĆ	Samed	Šaban	13/07/1954	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43
KLJAJIĆ	Šaban	Omer	18/05/1951	Male	REDACTED; P4887,pp.2,8 (FaN Mehmed); see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
KLJAJIĆ	Fezih	Tahir	20/06/1949	Male	REDACTED; P4887,pp.2,8 (FaN Ibrahim); see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43
MATANOVIĆ	Juro	Ivo	19/08/1952	Male	REDACTED; P4887,pp.2,8 (FN Jure); see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
MEŠIĆ	Mehmed	Ibro	13/06/1945		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
MAHIĆ	Fikret	Jusuf	15/02/1948		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
MUJĐIĆ	Taib	Haso	05/11/1931	Male	REDACTED; P4887,pp.2,8 (DOB 1932); see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43 (FaN Hase)
MUSIĆ	Ćamil	Emin	10/02/1944	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
MUSIĆ	Faruk	Mumin	25/01/1960	Male	KDZ050:P1949
MUSIĆ	Mujo	Sejfo	07/07/1950	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.43
MUSIĆ	Rasim	Asima	04/07/1949	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.43 (FaN Asim)
MUSIĆ	Semir	Šaban	06/11/1958	Male	REDACTED; KDZ050:P1949 (FN Samir)
OKIĆ	Emsud	Atif	22/06/1956		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44
OMANOVIĆ	Nedim	Sakib	01/02/1966		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44
PAŠIĆ	Mujo	Muharem	06/04/1936	Male	REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44
PELAK	Refik	Ibrahim	06/05/1959	Male	P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; N.SEBIRE:P646 p.189, 308; A.MAŠOVIĆ:P4853,p.44

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
RAMADANOVIĆ	Jasmir	Šefik	01/01/1955		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44 (FN Jasmin)
REŠIĆ	Senad	Husein	09/05/1955		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44
REĐIĆ	Hasan	Ibrahim	05/03/1964		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44 (DOB 1962)
SADIKOVIĆ	Esad	Hasib	17/06/1948	Male	P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; D4138,para.83; Ž.MEJAKIĆ:T.44258-44259; AF1188-1189; REDACTED; NusretSIVAC:P3478,pp.136-137; D4138,para.83; A.MAŠOVIĆ:P4853,p.44
SIJEČIĆ	Enver	Meho	08/11/1944		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.44
SOFTIĆ	Asim	Mehmed	01/06/1944		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44
SUHONIĆ	Nail	Vehbija	01/08/1951		REDACTED; P4887,pp.2,8 (LN SUHOLJIĆ, DOB 1949); see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44 (DOB 1959)
ZAHIROVIĆ	Smajo	Huso	17/09/1963		REDACTED; P4887,pp.2,8; see also A.MAŠOVIĆ:P4850,pp.47-48; A.MAŠOVIĆ:P4853,p.44
ZUKANOVIĆ	Emsud				REDACTED;
ZUKANOVIĆ	Muste				REDACTED; KDZ050:P1949
ZUKANOVIĆ	Sabid	Huso	01/01/1948	Male	P4887,p.2; see also A.MAŠOVIĆ:P4850,pp.47-48; KDZ050:P1949; A.MAŠOVIĆ:P4853,p.44 (FN Sabit)
Prijedor B.15.5					
FORIĆ	FNU			Unknown	KDZ611:P4101,p.9 (6 persons FNU); KDZ054:P682,pp.29-30; I.MERDŽANIĆ:P3881,p.73,91 (5 or 6 persons FNU); M.SEJMENOVIĆ:T.20512,20576-20577
FORIĆ	Zihad			Male	KDZ054:P682,pp.29-30
FORIĆ	Zilhad			Male	KDZ054:P682,pp.29-30
KEKIĆ	Sulejman		03/05/1928	Male	REDACTED;
KLJIPIĆ	Fuad		11/02/1941		REDACTED; KDZ611:P4101,p.9
MURGIĆ	Ante	Anto	10/04/1935	Male	NusretSIVAC:P3478,p.140 (LN MUREGA, FN Anto)
MURGIĆ	FNU			Unknown	I.MERDŽANIĆ:P3881,p73
MURGIĆ	Zoran	Anto	01/01/1969	Male	NusretSIVAC:P3478,p.140 (LN MUREGA)
TALIĆ	Teufik			Male	I.MERDŽANIĆ:P3881,p72
Prijedor B.15.6					
ŽERIĆ	Ferid	Karanfil	14/05/1959	Male	A.MAŠOVIĆ:P4853,p.93; P5911,pp.204-206
ŽERIĆ	Sakib	Idriz	16/06/1967	Male	REDACTED; A.MAŠOVIĆ:P4853,p.93; P5911,pp.207-213

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ŠABANOVIĆ	Almir	Rešid	13/07/1974	Male	REDACTED; REDACTED;
ŠLJIVAR	Omer	Hali	29/06/1963	Male	A.MAŠOVIĆ:P4853,p.92
ČUSTIĆ	Hilimija	Mehmed	26/01/1960	Unknown	A.MAŠOVIĆ:P4853,p.92; P5911,p.39
ČUSTIĆ	Ismet	Mehmed	21/07/1968	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,p.40
ČAUŠEVIĆ	Besim	Smail	19/08/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.36-38
ČOLIĆ	Hasan	Džemal	15/05/1971	Male	P5912,p.41
ČORALIĆ	Emin	Hasan	26/09/1950	Male	REDACTED;
ALIŠIĆ	Edin	Mehmed	16/04/1966	Male	REDACTED;
ALIĆ	Mujo	Alija	14/09/1963	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,p.1
ALIĆ	Sejad	Rifet	18/03/1963	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.2-4
ANTUNOVIĆ	Ilija	Ivo	02/09/1946	Male	P5912,p.26
ARIFAGIĆ	Enver	Avdo	19/06/1944	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.5-13
ARIFAGIĆ	Mehmed	Ekrem	03/05/1973	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.14-15
AVDIĆ	Rasim	Sulejman	10/04/1939	Male	REDACTED; P5912,p.42
AVDIĆ	Sejad	Ibrahim	11/01/1955	Male	REDACTED; P4431 (under seal); see also P4851,p.58 (under seal)
BAŠIĆ	Rasim	Muharem	18/07/1941	Male	REDACTED; REDACTED; REDACTED;
BAJRIĆ	Šerif	Ramo	16/12/1941	Male	REDACTED; REDACTED;
BAJRIĆ	Zarif	Šerif	25/06/1971	Male	REDACTED; P5912,p.25
BEŠIĆ	Bećir	Adem	07/04/1931	Male	REDACTED; REDACTED; REDACTED;
BEŠIĆ	Mustafa	Ibrahim	10/05/1944	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,p.16
BEŠIĆ	Nermin	Izet	21/09/1969	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.17-22
BEŠIĆ	Nihad	Meho	22/04/1971	Male	REDACTED;
BEŠIĆ	Sead	Adem	06/12/1965	Male	A.MAŠOVIĆ:P4853,p.92; P5911,p.23-24
BEŠIĆ	Zilhad	Hamida	01/03/1941	Male	REDACTED; REDACTED;
BEŠLAGIĆ	SUVAD	Mustafa	23/07/1965	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.25-26
BLAŽEVIĆ	Ahmet	Hamdija	30/09/1962	Male	P5912,pp.30-31
BLAŽEVIĆ	Fadil	Ibrahim	22/12/1952	Male	A.MAŠOVIĆ:P4853,p.92; P5911,p.27-28
BLAŽEVIĆ	Fikret	Himzo	04/11/1962	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.29-31
BLAŽEVIĆ	Džemal	Sejdo	13/09/1970	Male	P5912,p.32
BLAŽEVIĆ	Mustafa	Edhem	25/07/1964	Male	A.MAŠOVIĆ:P4853,p.92; P5912,p.27
CEJVAN	Zijad	Ibrahim	25/07/1967	Male	P5912,p.13
CRLJENKOVIĆ	Muharem	Saban		Male	P5911,p.32-35
DERGIĆ	Admir	Džemal	04/04/1971	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.41-43
DJONLAGIĆ	Emir	Kemal		Male	P5912,p.1
DURATOVIĆ	Fadil	Fehim	07/09/1956	Male	P5911,pp.44-46
ELEZOVIĆ	Šaban	Šerif	29/05/1950	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.47-49
ELEZOVIĆ	Edin	Muharem	21/09/1968	Male	REDACTED; P5912,p.24
ELEZOVIĆ	Emir	Muharem	14/01/1970	Male	REDACTED; P5912,p.24

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Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
ELEZOVIĆ	Hajrudin	Salih	20/06/1947	Male	REDACTED; P5912,p.28
ELEZOVIĆ	Jasmin	Hajrudin	05/03/1971	Male	P5912,p.18
FAZLIĆ	Almir	Refik	10/02/1960	Male	REDACTED; REDACTED; REDACTED; REDACTED;
FAZLIĆ	EDIN	HILMIJA	17/04/1963	Male	REDACTED; A.MAŠOVIĆ:P4853,p.91; P4640,p.2
FAZLIĆ	Emir	Muharem	30/05/1970	Male	REDACTED;
FAZLIĆ	Ismet	Dervis	12/06/1955	Male	P5911,pp.50-54
FAZLIĆ	Jasim	Ismet	31/05/1950	Male	REDACTED; REDACTED; REDACTED; REDACTED;
FAZLIĆ	Mirsad	Ismet	30/07/1963	Male	REDACTED;
FORIĆ	Zijad	Rasim	11/05/1954	Male	REDACTED;
GARIBOVIĆ	Šefik	Osman	14/04/1957	Male	REDACTED; REDACTED; REDACTED;
GARIBOVIĆ	Kemal	Hamdija	12/05/1948	Male	REDACTED; REDACTED; P5911,pp.55-56
GARIBOVIĆ	Samir	Sadik	06/01/1973	Male	REDACTED; REDACTED; REDACTED;
GARIBOVIĆ	Taib	Arif	06/06/1958	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.57-58
GARIBOVIĆ	Vasif	Atif	27/08/1957	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.59-64
GARIBOVIĆ	Zuhdija	Emin	15/07/1966	Unknown	REDACTED;
GRABIĆ	Muhamed	Abaz	22/06/1971	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.65-69
GRABIĆ	Mustafa	Meho	20/07/1969	Male	A.MAŠOVIĆ:P4853,p.92; P5912,pp.10-12
GRABIĆ	Vejsil	Meho	28/03/1971	Male	P5912,p.12
GUTIĆ	Mirsad	Hasan	15/09/1968	Male	P5912,p.29
HANKIĆ	Husein	Salih	04/10/1948	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.70-72
HASANAGIĆ	Osman	Hasan	02/04/1957	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.73-77
HIRKIĆ	Šefik	Husein	15/06/1966	Male	A.MAŠOVIĆ:P4853,p.92; P5912,p.17
HIRKIĆ	Ismet	Husein	22/08/1950	Male	P5912,p.17
HIRKIĆ	Rifet	Husein	16/02/1960	Male	P5912,p.17
HODŽIĆ	Ahmet	Husein		Male	P5911,pp.78-82
HODŽIĆ	Midhet	Fehim	25/04/1966	Male	REDACTED;
HODŽIĆ	Mirsad	Hilmija	14/12/1957	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.83-86
HRUSTIĆ	Mahmut	Sefer	19/12/1971	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.87-88
HUSKANOVIĆ	Zijad	Muharem	02/01/1966	Male	REDACTED; REDACTED; REDACTED;
IČIĆ	Hajro	Huske	13/05/1946	Male	P5912,p.34
JAKUPOVIĆ	Armin	Mustafa	01/07/1967	Male	REDACTED;
JASKIĆ	Fehret	Jasim (Dedo)	31/07/1960	Male	REDACTED; REDACTED; REDACTED;
JUSUFAGIĆ	Senad	Latif	11/10/1965	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.89-90
KADIRIĆ	Sejad	Mustafa	24/10/1950	Male	REDACTED; REDACTED;
KADIRIĆ	Zuhdija	Meho	01/07/1959	Male	P5912,p.20
KAHRIMANOVIĆ	Uzeir	Muharem	20/03/1954	Male	P5911,pp.97-101
KAHRIMANOVIĆ	Mehmed	Sulejman	04/09/1964	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.91-96

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KAHRIMANOVIĆ	Rifet	Abid	08/05/1959	Male	P5912,p.2
KARABAŠIĆ	Derviš	Osman	26/01/1970	Male	P5911,pp.111-117
KARABAŠIĆ	Osman	Derviš	05/01/1943	Male	P5911,pp.108-110
KARABAŠIĆ	Samir	Dedo	20/06/1972	Male	P5912,p.2
KARARIĆ	Elvir	Kadir	23/02/1976	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.111-117
KARARIĆ	Isak	Ahmet	29/05/1959	Male	REDACTED; P5912,p.43
KARARIĆ	Kadir	Husein	01/07/1947	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.118-121
KAUKOVIĆ	Elvin	Mehmed	01/04/1972	Male	A.MAŠOVIĆ:P4853,p.91; P4640,p.3
KLJAJIĆ	Meho	Ahmet	01/06/1954	Male	P5911,p.122
KLJAJIĆ	Sakib	Ahmet	29/06/1962	Male	REDACTED; P5911,pp.123-127
KLJAJIĆ	Suad	Meho	16/07/1973	Male	REDACTED;
KRKIĆ	Ahmet	Salih	23/01/1943	Male	A.MAŠOVIĆ:P4853,p.92; P4640,p.4
KULAŠIĆ	Abaz	Omer	01/11/1950	Male	A.MAŠOVIĆ:P4853,p.92; P5912,pp.5-7
MAHMULJIN	Ibrahim	Arif	11/05/1963	Male	REDACTED;
MAROŠLIĆ	Himzo	Redžo	15/03/1945	Male	P5912,p.9
MAROŠLIĆ	Velid	Ramo	28/06/1972	Male	P5911,pp.128-130
MEDIĆ	Šefik	Hilimija	19/09/1949	Male	REDACTED;
MEDIĆ	Ejub	Abaz	28/10/1954	Male	REDACTED;
MEHMEDAGIĆ	Alija	Bečo	27/04/1951	Male	P5912,p.37
MEHMEDAGIĆ	Osman	Husein	12/10/1956	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.131-133
MEMIĆ	Asmir	Mehmed	27/03/1963	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.134-135
MEMIĆ	Nihad	Sulejman	16/06/1973	Male	REDACTED;
MRKALJ	Himzo	Omer	02/11/1942	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5912,p.40
MUJKANOVIĆ	Edin	Osman	23/10/1966	Male	REDACTED; A.MAŠOVIĆ:P4853,p.92; P5911,pp.136-146
MUJKANOVIĆ	Fahrudin	Redžep	26/09/1963	Male	REDACTED; REDACTED; REDACTED;
MUJKANOVIĆ	Fikret	Edhem	16/11/1961	Male	A.MAŠOVIĆ:P4853,p.92; P5911,pp.150-151
MUJKANOVIĆ	Husein	Hamdija	25/08/1966	Male	P5911,pp.147-149
MUJKANOVIĆ	Refik	Rasim		Male	P5911,pp.152-153
MUJKANOVIĆ	Senad	Esad	22/01/1971	Male	REDACTED;
MUJKANOVIĆ	Vasif	Mahmut	17/03/1960	Male	REDACTED; P5911,p.154
MURČEHAJIĆ	FUAD	DERVIŠ	28/07/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.93
MURČEHAJIĆ	Mehmed	Dervis		Male	P5911,pp.156-160
MURČEHAJIĆ	Idriz	Hase	01/01/1965	Male	P5912,p.33
MURANOVIĆ	Samir	Salih	05/08/1968	Male	REDACTED;
MURATČEHAJIĆ	Mehmed	Derviš	12/08/1960	Male	A.MAŠOVIĆ:P4853,p.93
PARATUŠIĆ	Zijad	Sulejman	10/10/1954	Male	A.MAŠOVIĆ:P4853,p.93; P5911,pp.161-163
RIZVANČEVIĆ	Faik	Osman	10/09/1963	Male	A.MAŠOVIĆ:P4853,p.93 (FN Fajko); P5911,pp.164-168
SADIĆ	Nail	Džemal	27/05/1950	Male	A.MAŠOVIĆ:P4853,p.93 (FaN Kemal); P5911,pp.177-184

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SALDUMOVIĆ	Bajazid	Hamza	05/07/1955	Male	A.MAŠOVIĆ:P4853,p.93 (DOB 1954); P5911,p.169
SALDUMOVIĆ	Jasmin	Mehmed	12/01/1970	Male	REDACTED; A.MAŠOVIĆ:P4853,p.93; P5911,pp.170-173
SELMOVIĆ	Said	Hamed	27/08/1968	Male	REDACTED;
SELMOVIĆ	Zilhad	Huska	12/05/1964	Male	A.MAŠOVIĆ:P4853,p.93; P5911,pp.174-176
SIVAC	Edin	Munib	01/07/1966	Male	P5912,pp.21-23
SIVAC	Kasim	Sefik	01/12/1968	Male	P5912,p.38
SIVAC	Merzuk	Ibrahim	30/01/1961	Male	REDACTED; P5912,p.39
SIVAC	Mujo	Salko	03/01/1940	Male	REDACTED; A.MAŠOVIĆ:P4853,p.93
SIVAC	Nedžad	Munib	04/07/1971	Male	P5912,pp.21-23
SIVAC	Safet	Džemal	06/10/1971	Male	REDACTED;
SLJIVAR	Omer	Halil		Male	P5912,p.3
SUŠIĆ	Nihad	Eniz	18/09/1971	Male	P5912,pp.14-16
TADŽIĆ	Zijad	Ibrahim	26/02/1953	Male	REDACTED; REDACTED; REDACTED;
TALJIĆ	Mehmedalija	Ibrahim	26/07/1963	Male	P5911,pp.185-190
TRNJANIN	Sakib	Bejdo	12/02/1953	Male	REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.92; P5912,p.19
TURKANOVIĆ	Senad	Hamdija	03/06/1961	Male	REDACTED; P5912,p.8
TURKANOVIĆ	Suad	Hamdija	26/01/1960	Male	REDACTED; P5912,p.8
VEHABOVIĆ	Mirsad	Miralem	11/02/1966	Male	P4640,p.1
VEHABOVIĆ	Seid	Miralem	28/04/1967	Male	A.MAŠOVIĆ:P4853,p.92; P4640,p.1
VELIĆ	Ekrem	Zuhdija	15/06/1967	Male	A.MAŠOVIĆ:P4853,p.93; P5911,pp.191-193
VELIĆ	Fadil	Ramo	09/03/1963	Male	A.MAŠOVIĆ:P4853,p.93; P5911,pp.194-197
ZAHIROVIĆ	Ziko	Husein	22/07/1962	Male	REDACTED; A.MAŠOVIĆ:P4853,p.93; P5911,pp.198-203
ZULIĆ	Mesud	Uzeir	08/01/1966	Male	REDACTED; REDACTED; REDACTED;
ZULIĆ	Mirsad	Alija	03/11/1961	Male	P5912,p.4
ZULIĆ	Nedžad	Latif	02/06/1970	Male	P5912,p.35
ZULIĆ	Suad	Alija	16/03/1965	Male	REDACTED; REDACTED; REDACTED;
Rogatica B.16.1					
BEŠILJA	Mujo			Male	KDZ051:P3405,para.88; P3283,pp.4,10
Rogatica B.16.2					
ŠETIĆ	FUAD	DERVIŠALIJA	15/03/1932	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.9,44-45,68; P4853,p.94; A.MAŠOVIĆ:P4853,p.94; P4895,pp.6,43-44; see also A.MAŠOVIĆ:P4850,p.50
ČATIĆ	EDIS	GALIB	31/03/1971	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.7,23-24,64,66; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.4,23-24 (DOB 30/05/1971); see also A.MAŠOVIĆ:P4850,p.50

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ČATIĆ	MEVLUDIN	SABRIJA	08/01/1976	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.8,29-30,65,67; P4853,p.93 ; A.MAŠOVIĆ:P4853,p.93; P4895,pp.5,29-30; see also A.MAŠOVIĆ:P4850,p.50
ČATIĆ	MIDHAT	RASIM	01/01/1974	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.10,37-38,69; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.7,37-38 (DOB 22/10/1974); see also A.MAŠOVIĆ:P4850,p.50
ČATIĆ	VAHUDIN	SABRIJA	22/11/1977	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7 (FN Vahidin); P3276,pp.10,33-34,69; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.7,33-34; see also A.MAŠOVIĆ:P4850,p.50
DELJUA	MEHMED	HAMDO	07/06/1953	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.10,31-32,69; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.7,31-32; see also A.MAŠOVIĆ:P4850,p.50
HALILOVIĆ	HALIL	HALIL	03/05/1944	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.12,50-51,67; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.9,49-50; see also A.MAŠOVIĆ:P4850,p.50
HODŽIĆ	ELDIN	RAMIZ	01/03/1975	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7 (FN Elvedin); P3276,pp.7,19-20,64,66; P4853,p.93 ; A.MAŠOVIĆ:P4853,p.93; P4895,pp.4,19-20; see also A.MAŠOVIĆ:P4850,p.50
ISAKOVIĆ	FARUK	ALJA	12/01/1972	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.8-9,27-28,68; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.6,27-28 (DOB 12/01/1971); see also A.MAŠOVIĆ:P4850,p.50
JAŠAREVIĆ	HAMDJUA	HALIL	07/01/1936	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.9,40-41,69; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.6,39-40 (DOB 07/01/1937); see also A.MAŠOVIĆ:P4850,p.50
JAŠAREVIĆ	HUSEIN	HALIL	03/03/1939	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7 (FN Huso); P3276,pp.10,35-36,69; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.7,35-36; see also A.MAŠOVIĆ:P4850,p.50

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JASAREVIĆ	SULEJMAN	HALIL	18/10/1954	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283.p.7 (FN Suljo); P3276,pp.11,58-59,67; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.8,57-58; see also A.MAŠOVIĆ:P4850,p.50
KAPO	ASIM	BEKTO	20/03/1967	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283.p.7; P3276,pp.8,17-18,65,67; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.5,17-18; see also A.MAŠOVIĆ:P4850,p.50
KAZIĆ	FUAD	MEHMED	09/08/1938	Male	REDACTED; REDACTED; KDZ606:P3279,para.100; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.11,54-55,67; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.8,53-54 (FaN Meho); see also A.MAŠOVIĆ:P4850,p.50
KAZIĆ	NEDŽAD	MEHMED	09/07/1936	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.9,42-43,68-69; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.6,41-42 (FaN Meho); see also A.MAŠOVIĆ:P4850,p.50
KAZIĆ	SULEJMAN	ČAMIL	17/08/1930	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283.p.7; P3276,pp.7,21-22,64,66; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.4,21-22; see also A.MAŠOVIĆ:P4850,p.50
KURČEHAJIĆ	BESIM	DEŠO	05/12/1935	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7 (LN KURČEHAJIĆ); P3276,pp.11,52-53,67; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.9,51-52; see also A.MAŠOVIĆ:P4850,p.50
OMERAGIĆ	ŠUĆRIJA	JUSUF	01/01/1957	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.9,25-26,68; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.6,25-26 (DOB 04/01/1957); see also A.MAŠOVIĆ:P4850,p.50
PAŠIĆ	DERVIŠ	MEHMED	06/05/1930	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.12,46-47,67; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.9,45-46 (DOB 07/01/1930); see also A.MAŠOVIĆ:P4850,p.50
PAŠIĆ	MESUD	IZET	04/05/1974	Male	REDACTED; REDACTED; KDZ607:T.18480; P6107.p.2; P3283,p.7; P3276,pp.8,13-14,65,67; P4853,p.93; A.MAŠOVIĆ:P4853,p.93; P4895,pp.5,13-14 (DOB 29/10/1967); see also A.MAŠOVIĆ:P4850,p.50

Municipalities Victim List

<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
PAŠIĆ	MUJO	AHMO	07/09/1953	Male	REDACTED; REDACTED; REDACTED; KZD607:T.18480; P6107,p.2; P3283,p.7; P3276,pp.8,15-16,65, 67; P4853,p.94; A.MAŠOVIĆ:P4853,p.94; P4895,pp.5,15-16; see also A.MAŠOVIĆ:P4850,p.50
SALJHOVIĆ	ZAJKO	ALJA	12/04/1938	Male	REDACTED; REDACTED; KZD607:T.18480; P6107,p.2; P3283,p.7; P3276,pp.12,48-49,67; P4853,p.94; A.MAŠOVIĆ:P4853,p.94; P4895,pp.9,47-48; see also A.MAŠOVIĆ:P4850,p.50
SOLAK	OSMAN	IBRAHIM	10/01/1932	Male	REDACTED; REDACTED; KZD607:T.18480; P6107,p.2; P3283,p.7; P3276,pp.1,56-57,67; P4853,p.94; A.MAŠOVIĆ:P4853,p.94; P4895,pp.8,55-56 (FaN Ibro); see also A.MAŠOVIĆ:P4850,p.50
TANKOVIĆ	MUSTAFA	HAMZA	05/05/1931	Male	REDACTED; REDACTED; KZD607:T.18480; P6107,p.2; P3283,p.7; P3276,pp.10,61-62,69; P4853,p.94; A.MAŠOVIĆ:P4853,p.94; P4895,pp.8,59-60; see also A.MAŠOVIĆ:P4850,p.50
Sanski Most B.17.1					
DZAFIĆ	FNU			Male	A.ZULJIĆ:P718,p.20
EMINIĆ	Ibro	Fehim	01/03/1934	Male	REDACTED; A.ZULJIĆ:P718,pp.20-21 ; A.MAŠOVIĆ:P4853,p.94; P4897,pp.16-17; see also P4896 and A.MAŠOVIĆ:P4850,pp.50-51
PAŠIĆ	Smail	Munib	20/10/1963	Male	A.ZULJIĆ:P718,p.20; A.MAŠOVIĆ:P4853,p.94; P4897,pp.43-44; see also P4896 and A.MAŠOVIĆ:P4850,pp.50-51
VELIĆ	FNU			Unknown	A.ZULJIĆ:P718,p.20; A.MAŠOVIĆ:P4853,p.94 (FN Sadmir, FaN Rifet, DOB 1966); P4897,pp.41-42; see also P4896 and A.MAŠOVIĆ:P4850,pp.50-51
Vlasenica B.18.1					
DEDIĆ	Ismet	Emin	15/10/1955	Male	REDACTED;
FERHATBEGOVIĆ	RAŠID	OSMAN	02/02/1940	Male	REDACTED; I.OSMANOVIĆ: P3212, para.140; REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.94
HANDŽIĆ	DURMO	MEHO	13/01/1933	Male	REDACTED; I.OSMANOVIĆ: P3212,paras.126-127; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.95
HATUNIĆ	Mevludin	Velija	20/01/1949	Male	REDACTED;
KOLAREVIĆ	MUHAREM	RAHMAN	17/12/1949	Male	REDACTED; REDACTED; REDACTED; REDACTED;
MUSIĆ	GALIB	IBRO	05/09/1932	Male	A.MAŠOVIĆ:P4853,p.94
SARIĆ	Dževad	Adem	04/09/1962	Male	REDACTED;
					REDACTED; I.OSMANOVIĆ:P3212,paras.135-136,139; REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.94 (LN ŠARIĆ)

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
ZEKIĆ	ISMET (Ibrahim)	IBRO	15/02/1963	Male	REDACTED; REDACTED; REDACTED; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.95
ZILDŽIĆ	ASIM	HASO	10/06/1935	Male	REDACTED; I.OSMANOVIĆ:P3212, paras.126-127; REDACTED; REDACTED; A.MAŠOVIĆ:P4853,p.95
Vlasenica B.18.2					
ŠAHBEGOVIĆ	Edhem	Omer	04/02/1953	Male	REDACTED; A.MAŠOVIĆ:P4853,p.54
ŠAHINPAŠIĆ	Esad	Osman	27/09/1946	Male	REDACTED; A.MAŠOVIĆ:P4853,p.54
ŠAHINPAŠIĆ	Mersudin	Esad	01/01/1969	Male	REDACTED;
ŠAHINPAŠIĆ	Nedim	Osman	07/06/1952	Male	REDACTED;
ŠAHINPAŠIĆ	Senahid	Osman	01/01/1948	Male	REDACTED;
AGANOVIĆ	Nedzim	Hajrudin	08/09/1962	Male	REDACTED;
ALIHODŽIĆ	Amir	Ibro	01/03/1958	Male	REDACTED;
ALIHODŽIĆ	Jakub	Ibro	12/08/1954	Male	REDACTED;
ARIFHODŽIĆ	Salko	Džemal	19/02/1942	Male	REDACTED;
ATALOV	Naser	Hakija	08/09/1957	Male	REDACTED;
DURMANOVIĆ	Šaban	Alija	13/01/1929	Male	REDACTED;
EFENDIĆ	Osmo	Ibro	10/01/1960	Male	REDACTED;
EFENDIĆ	Salko	Ibro	01/01/1964	Male	REDACTED; A.MAŠOVIĆ:P4853,p.95
FERHATBEGOVIĆ	Jasmin	Ragib	12/08/1972	Male	REDACTED;
FERHATBEGOVIĆ	Ragib	Šaćir	01/01/1950	Male	REDACTED; A.MAŠOVIĆ:P4853,p.52
GRUHONJIĆ	Jusuf	Hašim	15/01/1939	Male	REDACTED;
HADŽIĆ	Bernis	Muradif	04/04/1963	Male	REDACTED;
HADŽIĆ	Enes	Muradif	18/09/1961	Male	REDACTED; A.MAŠOVIĆ:P4853,p.95
HADŽIĆ	Namko	Edhem	20/05/1956	Male	REDACTED;
HANDŽIĆ	Suljo	Osman	03/02/1955	Male	REDACTED; A.MAŠOVIĆ:P4853,p.53
HASANBEGOVIĆ	ŠEMSUDIN	ZAIM	01/01/1960	Male	REDACTED; A.MAŠOVIĆ:P4853,p.53
HASANBEGOVIĆ	Armin	Šahbaz	22/11/1961	Male	REDACTED; A.MAŠOVIĆ:P4853,p.53
HASANBEGOVIĆ	Menstur	Šahbaz	01/01/1955	Male	REDACTED;
HASANBEGOVIĆ	Mevludin	Šahbaz	18/04/1955	Male	REDACTED; A.MAŠOVIĆ:P4853,p.53
HODŽIĆ	Mevludin	Mehemed	25/03/1950	Male	REDACTED;
MEHANOVIĆ	Sead	Adil	21/04/1958	Male	REDACTED;
MEHANOVIĆ	Seid	Adil	29/11/1954	Male	REDACTED;
MEHANOVIĆ	Sejfo	Adil	23/02/1949	Male	REDACTED; A.MAŠOVIĆ:P4853,p.54
MLAČO	Mehmed	Sulejman	20/01/1942	Male	REDACTED;
PARIĆ	Hasan	Ibro	21/07/1954	Male	REDACTED;
SARAČEVIĆ	OSMAN	SULJO	03/09/1956	Male	REDACTED; A.MAŠOVIĆ:P4853,p.54
SMAJLOVIĆ	Alija	Mujo	01/03/1954	Male	REDACTED; A.MAŠOVIĆ:P4853,p.54
SMAJLOVIĆ	Hazim	Mujo	09/09/1958	Male	REDACTED; A.MAŠOVIĆ:P4853,p.54

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SMAJLOVIĆ	MUJO	RASIM	10/10/1927	Male	REDACTED; A. MAŠOVIĆ:P4853.p.54
TALJIĆ	Ahmet	Ibrahim	06/03/1950	Male	REDACTED; A. MAŠOVIĆ:P4853.p.55
TELALOVIĆ	MUHAMED	ČAZIM	16/10/1961	Male	REDACTED; A. MAŠOVIĆ:P4853.p.55
TELALOVIĆ	Sejfo	Rešid	02/08/1952	Male	REDACTED;
TOPČIĆ	BEGO	MUHAREM	16/02/1955	Male	REDACTED; A. MAŠOVIĆ:P4853.p.55
TOPČIĆ	Enver	Muhidin	01/06/1954	Male	REDACTED;
TUTIĆ	Menstur	Mehmed	01/01/1954	Male	REDACTED; A. MAŠOVIĆ:P4853.p.55
ZLATIĆ	Ibrahim	Hasan	12/06/1952	Male	REDACTED;
Vlasenica B.18.3					
AMBEŠKOVIĆ	Džemal	Kadro	04/04/1931	Male	AF2700; I.OSMANOVIĆ:P3212, paras. 72-74; A. MAŠOVIĆ:P4853.p.95
Vlasenica B.18.4					
AHMETOVIĆ	GALIB	HAKIJA	12/05/1952	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.95
ALIĆ	ALIJA	OMER	19/04/1963	Male	A. MAŠOVIĆ:P4853.p.96
ALIĆ	HIDAJET	IBRO	26/06/1967	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
DŽAFIĆ	FAHRUDIN	SENAHID	17/09/1967	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
DŽAFIĆ	FEJZO	RAMIZ	04/01/1968	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
DŽAFIĆ	HAMED	MEHEMED	19/02/1970	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.95
DŽAFIĆ	HUSO	VEHBIJA	12/04/1960	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
DŽAFIĆ	IBRO	MEHEMED	16/08/1965	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.95
DŽAFIĆ	MEHEMED	IBRO	10/07/1945	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
DŽAFIĆ	MIRSAD	RAMIZ	25/01/1970	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
DŽAFIĆ	OSMAN	DŽAFER	01/07/1957	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
DŽAFIĆ	SAMIR	MAHO	29/12/1972	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
HUSEINOVIĆ	AZEM	HASIB	06/01/1972	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
KARIĆ	ARIF	OMER	09/02/1968	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.95
KARIĆ	RAMIZ	AVDO	25/01/1947	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.95
MUJIĆ	HALID	AZEM	05/11/1966	Male	A. MAŠOVIĆ:P4853.p.96
MUMINOVIĆ	Ibrahim	Nazif	01/01/1949	Male	A. MAŠOVIĆ:P4853.p.95 (FN Ibro)
SALJHOVIĆ	ISMET	IDRIZ	01/01/1941	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
SALJHOVIĆ	Ragib	IDRIZ	01/01/1954	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
SULJAGIĆ	ALIJA	DAUT	17/07/1951	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
SULJAGIĆ	Ibro	Daut	23/05/1953	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
SULJAGIĆ	MUNIB	HAKIJA	23/01/1957	Male	A. MAŠOVIĆ:P4853.p.96
SULJIĆ	ŠAHIN	SULJO	20/06/1944	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
SULJIĆ	HIMZO	ŠAHIN	26/09/1969	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96 (DOB 1962)
SULJIĆ	IZO	ŠAHIN	01/04/1971	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96
SULJIĆ	SULJO	SULEJMAN	10/06/1964	Male	S. DŽAFIĆ:P3263, para. 65 ; A. MAŠOVIĆ:P4853.p.96

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<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
Vogošća B.19.1					
ŠEHIĆ	DŽEMAIL	AVDIJA	21/08/1952	Male	P2397,p.24; B.SELIMOVIC:P47,para.26; E.MURACĀEVIC:P2361,paras.70,74 (FN Džemo); A.MAŠOVIC:P4853,p.98; P4883,p.24; see also A.MAŠOVIC:P4850,pp.45-46
ŠEHIĆ	FERID	IBRO	09/10/1968	Male	P2397,p.24; B.SELIMOVIC:P47, para.26; E.MURACĀEVIC: P2361, para.74 ; A.MAŠOVIC:P4853,p.98
ŠEHIĆ	Mehmed	Zilko	20/07/1956	Male	B.SELIMOVIC:P47,para.26 ; A.MAŠOVIC:P4853,p.98
ŠEHIĆ	Mustafa	Avdija	12/11/1939	Male	B.SELIMOVIC:P47,para.26
ŠUNJ	Sulejman	Bajro	01/01/1946	Male	P2397,p.25; A.MAŠOVIC:P4853.p.97; P4883,p.24; see also A.MAŠOVIC:P4850,pp.45-46
ČINARA	Enver	Ramiz	01/01/1936	Male	P2397,p.5; P1144,p.1; E.MURACĀEVIC:P2361,para.74; A.MAŠOVIC:P4853,p.98
ČOVIĆ	Šefik		01/01/1946	Male	P2397,p.5 (FN Šerif); A.MAŠOVIC:P4853,p.96
ČOVIĆ	AZIM	Ibrahim	01/01/1953	Male	P2397,p.5; Z.OKIĆ:P124,p.8 ; A.MAŠOVIC:P4853,p.98
AVDUKIĆ	RASIM	SALJH	06/09/1957	Male	B.SELIMOVIC:P47,para.26 ; P2397.p.3; A.MAŠOVIC:P4853.p.97; P4883,p.25 (LN AVDUKOVIC); see also A.MAŠOVIC:P4850,pp.45-46
DURMIĆ	Avdo			Male	B.SELIMOVIC:P47, para.26
DURMIĆ	AZEM	SALKO	28/05/1938	Male	P2397,p.6; B.SELIMOVIC:P47,para.26; P2387.p.1; E.MURACĀEVIC: P2361,para.74 ; A.MAŠOVIC:P4853,p.97
DURMIĆ	Hazem			Male	E.MURACĀEVIC:P2361,paras.70,74
DURMIĆ	Nail	Mumin	10/05/1957	Male	P2397,p.6; B.SELIMOVIC:P47,para.26; E.MURACĀEVIC: P2361,para.74 ; A.MAŠOVIC:P4853,p.98
FAZLIĆ	Hasan	Čamil	15/06/1944	Male	P2397,p.7; B.SELIMOVIC:P47,para.26; M.FAZLIĆ:P42,p.8
GUŠO	Mustafa	Hasib	01/01/1951	Male	P2397,p.8; A.MAŠOVIC:P4853.p.96; P4883,p.24 (LN GUŽO); see also A.MAŠOVIC:P4850,pp.45-46
HANDŽIĆ	Ramiz	Arif	24/08/1964	Male	B.SELIMOVIC:P47,paras.26-27 ; A.MAŠOVIC:P4853,p.98 (FaN Atif)
HOLUJIĆ	Bajro				P2397,p.10
HUJIĆ	Bajro	Meho	01/01/1954	Male	P2397,p.10 (DOB 1948); B.SELIMOVIC:P47,para.26; E.MURACĀEVIC: P2361,para.74 ; A.MAŠOVIC:P4853,p.97; P4883,p.25; see also A.MAŠOVIC:P4850,pp.45-46
ISMIC	Enver	Salko	01/01/1951	Male	P2397,p.11
ISMIC	Fejzo	Salko	01/01/1947	Male	P2397,p.11
KRUEZI	Safio	Kaplan	01/01/1945	Male	P2397,p.14 (FN Safet); B.SELIMOVIC:P47,para.27; E.MURACĀEVIC:P2361,para.74 (FN Safet); A.MAŠOVIC:P4853.p.98 (FN Safet)

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MEHANOVIĆ	Džemal	Hasan	01/01/1956	Male	P2397,p.15; A.MAŠOVIĆ:P4853,p.96; P4883,p.24; see also A.MAŠOVIĆ:P4850,pp.45-46
MUSIĆ	Šaban	Čamil	01/01/1946	Male	P2397,p.16; A.MAŠOVIĆ:P4853,p.96; P4883,p.24; see also A.MAŠOVIĆ:P4850,pp.45-46
MUSINOVIĆ	Nedžib	Edhem	01/01/1956	Male	P2397,p.16; A.MAŠOVIĆ:P4853,p.96; P4883,p.24; see also A.MAŠOVIĆ:P4850,pp.45-46
OMEROVIĆ	Sidik	Salko	01/01/1954	Male	P2397,p.19; A.MAŠOVIĆ:P4853,p.97 (DOB 1945); P4883,p.24; see also A.MAŠOVIĆ:P4850,pp.45-46
OMEROVIĆ	Suljo	Bajre	22/04/1951	Male	P2397,p.19; A.MAŠOVIĆ:P4853,p.96 (FN Sulejman, FaN Bajro); P4883,p.24; see also A.MAŠOVIĆ:P4850,pp.45-46
RIZVO	HAMID	HASAN	02/10/1969	Male	P2397,p.21; P1144,p.1; B.SELIMOVIĆ:P47,para.26 (son of Hasan); M.FAZLIĆ:P42,p.8 (son of Hasan); A.MAŠOVIĆ:P4853,p.98; P4883,p.25; see also A.MAŠOVIĆ:P4850,pp.45-46
RIZVO	Hasan			Male	P2397,p.21; B.SELIMOVIĆ:P46,para.32 (LN Rizva); M.FAZLIĆ:P42,p.8
SALKIĆ	BAJRAM	RAGIB	01/01/1948	Male	Z.OKIĆ:P124,p.8; P2397,p.22; A.MAŠOVIĆ:P4853,p.98
SELIMOVIĆ	NUSRET	ADIL	08/02/1970	Male	P2397,p.23; B.SELIMOVIĆ:P46,para.28; P47, para.26; P1144,p.1; E.MURAVEVIĆ:P2361,para.70; M.FAZLIĆ:P42,p.8 (LNU); A.MAŠOVIĆ:P4853,p.98
SKANDO	NERMIN	ČAMIL	30/04/1972	Male	P2397,p.23; P1144,p.1; E.MURAVEVIĆ:P2361,para.74; A.MAŠOVIĆ:P4853,p.98; P4883,p.23; see also A.MAŠOVIĆ:P4850,pp.45-46
TERZIĆ	Ferid			Male	E.MURAVEVIĆ:P2361,para.74
TIRIĆ	AVDO	ĐULAGA	01/01/1947	Male	P2397,p.25; P2387,p.1; E.MURAVEVIĆ:P2361,para.74; A.MAŠOVIĆ:P4853,p.98; P4883,p.23; see also A.MAŠOVIĆ:P4850,pp.45-46
Zvornik B.20.1					
ŠABANOVIĆ	Mujo	Alija	01/01/1954	Male	REDACTED; KDZ072:P425,pp.20-21,34-35; REDACTED; A.MAŠOVIĆ:P4853,p.105
ČOHADAREVIĆ	Aljo	Ibrahim	01/01/1931	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.101
ABIDOVIĆ	Beriz	Ramiz	01/01/1973	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.98
ABIDOVIĆ	Hariz	Ramiz	07/07/1968	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.98
ABIDOVIĆ	Muriz	Ramiz	01/01/1969	Male	REDACTED; KDZ072:P425,pp.22-23,34-35; A.MAŠOVIĆ:P4853,p.98
ABIDOVIĆ	Ramo	Ramiz	26/06/1972	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.98
AHMETOVIĆ	Asim	Hasan	01/01/1972	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.98

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AHMETOVIĆ	Fahro	Fadil	01/01/1973	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.98 (FN Fahrudin)
AHMETOVIĆ	Hasan	Alija	01/01/1935	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.98
AHMETOVIĆ	Hrusto			Male	REDACTED; KDZ072:P425,pp.34-35
AHMETOVIĆ	Mihrudin			Male	REDACTED; KDZ072:P425,pp.34-35
AHMETOVIĆ	Ramiz	Sulejman	01/01/1950	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.98
AHMETOVIĆ	Ramo			Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.98 (FN Rasim, FaN Rifet, DOB 1960)
AHMETOVIĆ	Senad			Male	REDACTED; KDZ072:P425,pp.34-35
AHMETOVIĆ	Venis			Male	REDACTED; KDZ072:P425,pp.34-35
ALIĆ	Aljo	Safet	01/01/1952	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.99
ALIĆ	Hasan	Aljo	01/01/1928	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.99
ALIĆ	Ibrahim		01/01/1940	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.99
ALIĆ	Kadrija			Male	REDACTED; KDZ072:P425,pp.34-35.
ALIĆ	Mehmedalija	Mehmed	01/01/1973	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.99
ALIĆ	Mujo	Hasan	01/01/1959	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.99
ALIĆ	Zahid	Hasan	01/01/1953	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.99
AVDIĆ	Asim	Avdo	01/01/1959	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.99
AVDIĆ	Muradif	Avdo	01/01/1952	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.99
BAŠIĆ	Sinan	Hasan	01/01/1933	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100
BARUČIĆ	Edin			Male	REDACTED; KDZ072:P425,pp.34-35
BARUČIĆ	Hakija	Meho	01/01/1927	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.99
BARUČIĆ	Hazim	Hakija	01/01/1961	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.99
BARUČIĆ	Mehmedalija	Mujo	01/01/1940	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100
BARUČIĆ	Mirsad	Mehmedalija	01/01/1965	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100

Municipalities Victim List

<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
BARUČIĆ	Suad	Džemal	01/01/1969	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100
BARUČIĆ	Vehid			Male	REDACTED; KDZ072:P425,pp.34-35
BARUČIĆ	Zulfo			Male	REDACTED; KDZ072:P425,pp.34-35
BEČIĆ	Osman	Haso	01/01/1938	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100 (FaN Huso, DOB 1936)
BEGANOVIĆ	Džemal	Osman	01/01/1959	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.100
BEGANOVIĆ	Esed	Smajo	01/01/1972	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100
BEGANOVIĆ	Mehmed	Smajo	01/01/1974	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100
BEGANOVIĆ	Mustafa	Smajo	01/01/1967	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100
BEGANOVIĆ	Nezir	Osman	01/01/1968	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.100
BEGANOVIĆ	Smajo	Omer	01/01/1938	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.100
BJELIĆ	Redžo	Semiz	01/01/1936	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.100
DAUTOVIĆ	Beriz	Nezir	01/01/1969	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Esad	Husein	01/01/1971	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Hasan	Husein	01/01/1961	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	HUSEIN	OMER	10/01/1931	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Huso	Husein	01/01/1964	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Idriz	Meho	09/05/1963	Male	REDACTED; KDZ072:P425,pp.34-35
DAUTOVIĆ	Mirsad	Mehmed	01/01/1975	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Mirzet	Selmo	31/03/1972	Male	REDACTED; KDZ072:P425,pp.34-35.
DAUTOVIĆ	Nezir	Husein	01/01/1947	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Omer	Selmo	01/01/1969	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Ragib	Muharem	01/01/1947	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
DAUTOVIĆ	Ramo	Omer	01/01/1949	Male	REDACTED; KDZ072:P425,pp.34-35.; A.MAŠOVIĆ:P4853,p.101

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
FEJZIĆ	Mevludin	Nuko	01/01/1967	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
FEJZIĆ	Nuko	Nurija	01/01/1926	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.101
HUSEINOVIĆ	Muriz	Mujo	01/01/1960	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.102
HUSEINOVIĆ	Velid	Mujo	01/01/1952	Male	REDACTED; KDZ072:P425,pp.22,34-35; A.MAŠOVIĆ:P4853,p.102
IBRALIĆ	Ahmet	Nezir	01/01/1967	Male	REDACTED; KDZ072:P425,pp.34-35.; A.MAŠOVIĆ:P4853,p.102
IBRALIĆ	Amil			Male	REDACTED; KDZ072:P425,pp.34-35
IBRALIĆ	Nezir	Mustafa	01/01/1940	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.102
KARIĆ	Mustafa	Hail	01/01/1948	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MEMIŠEVIĆ	Haso	Ibrahim	01/01/1960	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MEMIŠEVIĆ	Ramiz	Ibrahim	01/01/1949	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MEMIŠEVIĆ	Ramo	Ramiz	01/01/1971	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MEMIŠEVIĆ	Senaid	Ramiz	01/01/1972	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MEMIŠEVIĆ	Zaim	Ibrahim	01/01/1964	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MURATOVIĆ	Azem	Alija	01/01/1957	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103 (FaN Aljo, DOB 1959)
MURATOVIĆ	Bajro	Aljo	01/01/1967	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MURATOVIĆ	Mehmed	Alija	01/01/1963	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MUSTAFIĆ	Hasib	Salko	01/01/1910	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.103
MUSTAFIĆ	Juso	Hasib	01/01/1943	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.103
MUSTAFIĆ	Salko	Hasib	01/01/1939	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.103
OSMANOVIĆ	Šaban	Meho	01/01/1946	Male	REDACTED; KDZ072:P425,pp.34-35.; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Šabanija	Meho	01/01/1966	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Bajro	Meho	01/01/1949	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.104

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
OSMANOVIĆ	Džemail	Smajo	01/01/1958	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Juso	Meho	01/01/1964	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Mehmed			Male	REDACTED; KDZ072:P425,pp.34-35;
OSMANOVIĆ	Mehmedalija	Šaban	01/01/1956	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Meho	Bajro	01/01/1930	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Meho	Šaban	01/01/1958	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Muhamed	Redžo	01/01/1970	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Mujo	Šaban	01/01/1953	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Mujo			Male	REDACTED; KDZ072:P425,pp.34-35
OSMANOVIĆ	Ramo	Ibro	01/01/1925	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Redžo	Ramo	01/01/1952	Male	REDACTED; KDZ072:P425,pp.34-35; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Sefer	Šaban	06/08/1963	Male	REDACTED; KDZ072:P425,pp.34-35; REDACTED; A.MAŠOVIĆ:P4853,p.104
OSMANOVIĆ	Smajo			Male	REDACTED; KDZ072:P425,pp.34-35
Zvornik B.20.2					
ATLIĆ	HASAN	MEHMED	18/08/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.61; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.8
ATLIĆ	Abdula	Mehmed	01/01/1941		REDACTED; A.MAŠOVIĆ:P4853,p.61; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.8
BIKIĆ	Nurija	Hasan	01/01/1952	Male	REDACTED; A.MAŠOVIĆ:P4853,p.62; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.13
DŽIHIC	Enes	Salih	01/01/1935		REDACTED; A.MAŠOVIĆ:P4853,p.63; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.20
EFENDIĆ	Zulkarnejn	Omer	01/01/1935		REDACTED; A.MAŠOVIĆ:P4853,p.64; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.21
HADŽIAVIĆ	FARID	KASIM	14/07/1960	Male	REDACTED; ; A.MAŠOVIĆ:P4853,p.65; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.23
HADŽIAVIĆ	SALIH	MUSTAFA	01/01/1946	Male	REDACTED; ; A.MAŠOVIĆ:P4853,p.65; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.24
HALILOVIĆ	Abdurahman	Ahmet	01/01/1934		REDACTED; ; A.MAŠOVIĆ:P4853,p.65; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841,p.24

Municipalities Victim List

Last Name	First Name	Father's Name	Date of Birth	Sex	Proof Of Death (POD)
KULJANIN	Mustafa	Ibrahim	01/01/1953		REDACTED; ; A.MAŠOVIĆ:P4853.p.68; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841.p.40
MURATOVIĆ	Ahmet	Murat	01/01/1937		REDACTED; A.MAŠOVIĆ:P4853.p.69; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841.p.49
MUSTAFIĆ	Alija	Šaban	01/01/1953		REDACTED; ; A.MAŠOVIĆ:P4853.p.69; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841.p.50
PAŠIĆ	Mujo	Ahmet	01/01/1949		REDACTED; ; A.MAŠOVIĆ:P4853.p.70; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841.p.58
PEZEROVIĆ	Senaid	Mehmed	01/01/1957		REDACTED; ; A.MAŠOVIĆ:P4853.p.70; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841.p.58
PEZEROVIĆ	ZAIM	ŠEFO	09/04/1959	Male	REDACTED; P4417; A.MAŠOVIĆ:P4853.p.70; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55; P4841.p.58
TUHIĆIĆ	Safet	Salih	01/01/1937		REDACTED; A.MAŠOVIĆ:P4853.p.107; P4841.p.70
Zvornik B.20.3					
AHMETOVIĆ	ISMET	AGAN	20/11/1939	Male	REDACTED; A.MAŠOVIĆ:P4853.p.60; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
AVDIĆ	HASAN	ALJJA	15/03/1941	Male	A.MAŠOVIĆ:P4853.p.105
AVDIĆ	HRUSTAN	HAJDAR	12/10/1949	Male	REDACTED; A.MAŠOVIĆ:P4853.p.105
DEDIĆ	Himzo	Hilmo	02/06/1947	Male	P4418,pp.1-2
DELIĆ	Nurdin	Nurija	12/09/1974	Male	P4419,p.1
DELIĆ	NURJJA	MEHMED	30/06/1947	Male	A.MAŠOVIĆ:P4853.p.63; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
GOJKIĆ	ALJJA	MUJO	04/04/1939	Male	A.MAŠOVIĆ:P4853.p.64; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
GOJKIĆ	Hasan	Himzo	08/09/1952	Male	P4419,p.2
GOJKIĆ	HIMZO	OHRAN	13/06/1919	Male	A.MAŠOVIĆ:P4853.p.64; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
GOJKIĆ	Husein	Himzo	16/08/1946	Male	A.MAŠOVIĆ:P4853.p.64; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
GOJKIĆ	Ibro	Ibrahim	25/12/1939	Male	P4420
GOJKIĆ	Mensur	Mustafa	02/01/1974	Male	P4419,pp.3-4 (DOB 12/10/1967)
GOJKIĆ	Mustafa	Mujo		Male	A.MAŠOVIĆ:P4853.p.64; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
GOJKIĆ	Nijaz	Husein	28/07/1974	Male	P4418,pp.5-6; A.MAŠOVIĆ:P4853.p.65; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
GOJKIĆ	Senad	Dzemil	02/01/1974	Male	P4419,p.5
GOJKIĆ	Zijad	Husein	27/09/1969	Male	P4418,pp.3-4
HAMZIĆ	Nešad	Rasim	12/11/1956	Male	REDACTED; A.MAŠOVIĆ:P4853.p.106

Municipalities Victim List

<i>Last Name</i>	<i>First Name</i>	<i>Father's Name</i>	<i>Date of Birth</i>	<i>Sex</i>	<i>Proof Of Death (POD)</i>
JAŠAREVIĆ	AVDO	ABDULAH	20/09/1950	Male	REDACTED; A.MAŠOVIĆ:P4853.p.67; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
JAŠAREVIĆ	Nurija	Abdulah	28/03/1961	Male	REDACTED; A.MAŠOVIĆ:P4853.p.67; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
LUPIĆ	Adam	Ramo	26/01/1951	Male	P4419,p.6
SELIMOVIC	DŽEVAD	RIFET	12/02/1971	Male	A.MAŠOVIĆ:P4853,p.71; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
SELIMOVIC	Osman	Hrustan	01/01/1966	Male	A.MAŠOVIĆ:P4853,p.71; see also P4903 and A.MAŠOVIĆ:P4850,pp.54-55
SINANOVIC	Ramiz			Male	REDACTED;
SMAJLOVIĆ	Osman			Male	REDACTED;
Zvornik B.20.4					
BUKVIĆ	Bego			Male	J.AVDISPAHIĆ:P70,p.16
DAUTOVIĆ	FNU			Male	J.AVDISPAHIĆ:P70,p.12
LNU	FNU			Male	N.HADŽIEFENDIĆ:P62,p.1,12
OMEROVIĆ	Sead			Male	J.AVDISPAHIĆ:P70,pp.16-17
SALJHOVIĆ	Menstur ("Meco")			Male	REDACTED;

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APPENDIX H

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
Sniping Incident F1						
PITA	Anisa	Ekrem	01/01/1989	FEMALE	WOUNDED	P1991,pp.3-4(FNEmisa); AF155
Sniping Incident F2						
STOČANIN	Emira		12/08/1983	Female	WOUNDED	P1991,p.21; AF158
Sniping Incident F3						
ZAMETICA	Munira	Musan	10/06/1941	Female	KILLED	AF172; AF165; AF167; AF171; D672; S.SAHINOVIC:D673,p.2; P1622
Sniping Incident F4						
TARIĆ	Elma		01/01/1985	Female	WOUNDED	N.TARIĆ:D664,p.2; AF175; AF176; AF181; P1235; P1241,pp.1-3;
TARIĆ	Nafa		02/06/1958	Female	WOUNDED	N.TARIĆ:D664,p.2; AF175; AF176; AF181; P1245; P1241,pp.4-5
Sniping Incident F5						
KUNDO	Ramiza		01/01/1954	Female	WOUNDED	AF185; AF186; AF188; P1026
Sniping Incident F6						
DŽEVELAN	Sanija		01/01/1960	Female	WOUNDED	AF189; S.DZEVELAN:P2291,p.6; P1893; S.DZEVELAN:D670
Sniping Incident F7						
HAFIZOVIĆ	Hajra		01/01/1932	Female	WOUNDED	P1892; AF201; AF202
PLIVAC	Sehadeta		01/01/1941	Female	WOUNDED	P1892; AF201; AF202
Sniping Incident F8						
JUSIĆ	Mensur		07/07/1957	Male	WOUNDED	P1758,pp.1,3-5,16,17; P1757; AF212
KUĆINAR	Damir		01/01/1990	Male	WOUNDED	P1758,pp.1,3-5,16,17; P1757
SUKIĆ - LIKIĆ	Belma		07/07/1957	Female	WOUNDED	P1758,pp.1,3-5,17; P1757
Sniping Incident F9						
MURATOVIĆ	Sanela		01/01/1978	Female	WOUNDED	AF228; AF224; P1880
Sniping Incident F10						
SOLAK	Seid	Izet	21/06/1981	Male	WOUNDED	P18; AF237; AF244; REDACTED; REDACTED;
Sniping Incident F11						
ČUTUNA	Alma	Mehmed	01/03/1951	Female	WOUNDED	P1907,p.4; KDZ90:P2923,pp.5,8,11,12; AF2921; KDZ90:P482,p.5; AF2925; REDACTED
FRNJAK	Hedon	Ibrahim	14/07/1978	Male	WOUNDED	P1907,p.4
GAČEVIĆ	Aiša	Kasim	01/01/1950	Female	WOUNDED	P1907,p.3; P1255

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
GORO	Amir	Fahid	06/11/1980	Male	WOUNDED	P1907,p.4
HABIBOVIĆ	Zumra	Murat	25/04/1963	Female	WOUNDED	P1907,p.3; P1254
HADŽIBAJIĆ	Nedžad	Salko	16/11/1963	Male	KILLED	P1907,p.3
KAZIĆ	Džana	Nazim	01/05/1981	Female	WOUNDED	P1907,p.4
MEKIĆ	Almir		01/01/1974	Male	WOUNDED	P1907,p.4
MIHAČEVIĆ	Boris	Mladen	04/10/1978	Male	WOUNDED	P1907,p.4
MORO	Samir	Omer	05/05/1970	Male	WOUNDED	P1907,p.4; P1256
NIKOLIĆ	Davor	Momčilo	25/03/1978	Male	WOUNDED	P1907,p.3
USTAMUJIĆ	Mirza	Hajrudin	12/04/1981	Male	WOUNDED	P1907,p.3
Sniping Incident F12						
DIVOVIĆ	Nermin	Paso	14/10/1987	Male	KILLED	P459,pp.1,5,10,11-14; AF2940; AF2941; P2216; P1544
SOKOLOVIĆ,	Dženana		15/04/1963	Female	WOUNDED	P459,pp.1,2,5-9,11-14; AF2940; AF2945; P1023; S.BESLIĆ:P472,para.5; P1534,pp.1-2
Sniping Incident F14						
ŠABANIĆ	Sabina		03/01/1968	Female	WOUNDED	P1714,pp.1-2; S.ŠABANIĆ:P492,pp.4,10; P1833,p.2; P1545; AF2955; AF2958; AF2961; REDACTED; REDACTED
KARAČIĆ	Hafiza (Afeza)		03/05/1963	Female	WOUNDED	P1714,pp.1-2; P1833,p.2; AF2955; AF2959;
Sniping Incident F15						
ČEHAJIĆ	Alma		24/04/1976	Female	WOUNDED	P1729,pp.1,2,5,7,11,35; P1247; A.MULAOSMANOVIĆ-ČEHAJIĆ:P1551,pp.4-9; A.MULAOSMANOVIĆ-ČEHAJIĆ:D626; AF2979
BEČIĆ	Sead		01/01/1958	Male	WOUNDED	P1729,pp.1,2,5,8,11,34,35; P1546
HOLJAN	Alija		28/06/1939	Male	WOUNDED	P1729,pp.1,2,5,7,11,35; P1249; AF2979
JERLAGIĆ	Rabija		01/01/1929		WOUNDED	P1729,pp.1,2,5,7,11,25,35; P1546
KEŠMER	Senad		26/02/1964	Male	WOUNDED	P1729,pp.1,2,5,8,11,35; P1549
Sniping Incident F16						
AGOVIĆ	Azem		12/07/1948	Male	WOUNDED	P1727,pp.1,2,4,5,7,14,18,20,24; AF2992; AF2996
GAGULA	Enver			Male	WOUNDED	P1727,pp.2,5
GIČEVIĆ	Alen		02/06/1961	Male	WOUNDED	P1727,pp.1,2,4,5,7,15,19,21,24; AF2992; AF2996
Sniping Incident F17						

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
ŽUNIĆ	Tarik		23/12/1980	Male	WOUNDED	P6361, pp.1,3; T.ŽUNIĆ:P496, pp.4,13; T.ŽUNIĆ:P494,p.9; AF3000; AF3004; P1548
Shelling Incident G1						
ŠURKHOVIĆ	Samir			Male	WOUNDED	P1991,p.72
FAZLIĆ	Ašida	Himzo	11/04/1953	Female	WOUNDED	P1022; A.FAZLIĆ:P470,p.3
JUNUZOVIĆ	Sadija				KILLED	P1991,p.71
TARČIN	Esad				WOUNDED	P1991,p.72
TARČIN	Fadila		19/02/1976	Female	WOUNDED	F.TARČIN:P498, pp.4-5; P1991,p.71
Shelling Incident G2						
ŠAGOVIĆ	Munira				KILLED	P1991,p.77
ŠKULJ	Sadeta			Female	KILLED	F.PALAVRA:P497, para.10
ĆIRIĆ	Edis				WOUNDED	P1991,p.77
ČENGIĆ	Amra			Female	WOUNDED	P1991,p.77
ČENGIĆ	Ismet			Male	KILLED	P1991,p.80
ČOHODAR	Dženan				WOUNDED	P1991,p.77
ABADŽIĆ	Belma				WOUNDED	P1991,p.77
ABADŽIĆ	Rusmir			Male	WOUNDED	P1991,p.77
ARNAUTOVIĆ	Emir			Male	KILLED	P1991,p.77
ARNAUTOVIĆ	Hasan			Male	WOUNDED	P1991,p.80
AVDIĆ	Muhamed			Male	KILLED	Z.AVDIĆ:P500, paras.3,7
BEĆIREVIĆ	Fadil			Male	WOUNDED	P1991,p.80
BEĆIROVIĆ	Ismeta			Female	WOUNDED	F.PALAVRA:P497, paras.5,6,10; P1991,p.80
BEĆIROVIĆ	Sabina			Female	WOUNDED	F.PALAVRA:P497, paras.5,6,10; P1991,p.80(FNSabira)
BJELONJA	Davor				WOUNDED	P1991,p.77
BOZALIJA	Nihad			Male	KILLED	P1991,p.77
DUVNJAK	Sadeta				WOUNDED	P1991,p.79
FETAHOVIĆ	Abdulah			Male	KILLED	Z.AVDIĆ:P500, paras.6-7
GRANILO	Jasna			Female	KILLED	Z.GRANILO:P499, para.1
GRANILO	Zilha	Šerif	18/01/1941	Female	WOUNDED	Z.GRANILO:P499, para.3
HAJDINI	Fatima			Female	WOUNDED	P1991,p.80
HASTOR	Salko			Male	WOUNDED	P1991,p.81
HAZMAGIĆ	Nermin			Male	WOUNDED	P1991,p.77
HIROŠ	Ramiz			Male	KILLED	P1991,p.80
HODŽIĆ	Ferid			Male	KILLED	P1991,p.77
HODŽIĆ	Vasvija				WOUNDED	P1991,p.77
JUSUFOVIĆ	Salko			Male	KILLED	P1991,p.80

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
KAPETANOVIĆ	Osman			Male	KILLED	Z.AVDIĆ:P500,paras.6-7
KOŠ	Nedžad			Male	WOUNDED	P1991,p.77
LNU	Hasim			Male	WOUNDED	Z.AVDIĆ:P500,paras.6-7
MALETOVIĆ	Hikmet			Male	WOUNDED	F.PALAVRA:P497,paras.5,6,10; P1991,p.80
MELETOVIĆ	Senada				WOUNDED	P1991,p.80
MUŠIĆ	Nezira			Male	WOUNDED	P1991,p.77
MUŠOVIĆ	Idriz			Male	WOUNDED	P1991,p.77
MUJANOVIĆ	Fahra		31/10/1953	Female	WOUNDED	F.MUJANOVIĆ:P1865,p.3,para.12
MULAOMEROVIĆ	Salih				KILLED	P1991,p.77
NEIMARLIJA	Hasinja				KILLED	P1991,p.77
ONEŠČUK	Ivan			Male	WOUNDED	Z.AVDIĆ:P500,paras.6-7
PALAVRA	Fatima		18/03/1978	Female	WOUNDED	F.PALAVRA:P497,paras.5-8
PETROVIĆ	Simo				WOUNDED	P1991,p.80
PROZORAC	Dervis			Male	KILLED	P1991,p.77
SANĐAKOVIĆ	Mahmut			Male	KILLED	P1991,p.77
SANĐAKTAREVIĆ	Jasmina			Female	WOUNDED	P1991,p.77
SANĐAKTAREVIĆ	Salih			Male	KILLED	P1991,p.77
Shelling Incident G4						
ŽIŽIĆ	Marko	Krunoslav	18/01/1982	Male	KILLED	P1053,pp.4,42,48; P1869,p.6/P1898,p.12(duplicates); P1872,p.1; P463,p.9
ŠANDAL	Nedin		01/01/1980	Male	WOUNDED	REDACTED; P1898,p.7/P1869,p.9(duplicates); P1243,p.1
ŠTEKOVIĆ	Damir	Zlatan		Male	WOUNDED	P1053,p.4,46; (partialduplicates); P1869,p.4/P1898,p.4(duplicates)
ŠTEKOVIĆ	Zlatan		02/05/1951	Male	WOUNDED	P1053,pp.3-4,25-35,36,50; ; P1898,p.8/P1869,p.11(duplicates)
ČAMO	Samir			Male	WOUNDED	P1053,pp.4,50; P1898,pp.2,9/P1869,p.11(duplicates); P461,p.63; P462,p.3; P818,p.12
ČANKUŠIĆ	Edhem			Male	WOUNDED	P1053,pp.4,50; P1898,p.9/P1869,p.11(duplicates)
ČELEBIĆ	Smail			Male	WOUNDED	P1053,pp.4,51; P1898,p.14/P1869,p.12(duplicates); P1243,p.1

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
ČORAMBEGIĆ	Muamer	Ismet		Male	WOUNDED	P1053,pp.4,46; P1869,p.4/P1898,p.4(duplicates)(LNGORAMBEG OVIC)
ADROVIĆ	Malic				WOUNDED	P1053,pp.4,44
AGANSPAHIĆ	Rusmir				WOUNDED	P1053,pp.4,46
AGIĆ	Mirsad				WOUNDED	P1053,pp.4,45
ANTIĆ	Sasa			Male	WOUNDED	P1053,pp.4,46; P1898,p.5/P1869,p.5(duplicates)
AVDIĆ	Edo	Murat	19/06/1954	Male	WOUNDED	P1053,pp.4,48; P1898,p.13/P1869,p.6(duplicates)
BAJIĆ	Sead				WOUNDED	P1053,pp.4,50
BAJRAKTAREVIĆ	Atif	Asim	11/01/1951	Male	KILLED	P1053,pp.4,42,48; P1898,p.12/P1869,p.6(duplicates); P1889,p.1; P1872,p.1
BARISIĆ	Zoran				WOUNDED	P1053,pp.4,51
BASKARADA	Jakov				WOUNDED	P1053,pp.4,50
BEGLEROVIĆ	Lejla				WOUNDED	P1053,pp.4,45
BIHORAC	Šefto	Hlmo	10/09/1936	Male	WOUNDED	P1053,pp.4,45; P1898,p.2/P1869,p.3(duplicates)
BOSNJAK	Lazar				WOUNDED	P1053,pp.4,46
BRKIĆ	Neirmin				WOUNDED	P1053,pp.4,47
BUBREGOVIĆ	Vahid				WOUNDED	P1053,pp.4,44
CISIĆ	Zaim				WOUNDED	P1053,pp.4,44
COCALIĆ	Emina				WOUNDED	P1053,pp.4,43
CORANBEGIĆ	Muhamed				WOUNDED	P1053,pp.4,43
CURIĆ	Samir	Asim	29/02/1976	Male	WOUNDED	P1053,pp.4,47; P1898,p.16/P1869,p.15(duplicates); P461,p.62
CVJETANOVIĆ	Rešo				WOUNDED	P1053,pp.4,50
DŽAFEROVIĆ	Osman	Mujiro	09/05/1953	Male	WOUNDED	P1053,pp.4,48; P1898,p.13/P1869,p.6(duplicates)
DELJKOVIĆ	Mirza				KILLED	P1053,pp.4,42,51
DEMIĆ	Adnan				WOUNDED	P1053,pp.4,44
DZINO	Mehmed				WOUNDED	P1053,pp.4,47
FAZLIĆ	Ahmet			Male	WOUNDED	P1053,pp.4,44; P1898,p.10/P1869,p.7(duplicates)

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
FAZLIĆ	Ismet	Suljo		Male	WOUNDED	REDACTED; P1898,p.7/P1869,p.9(duplicates); P1243,p.1
FAZLIĆ	Ismet			Male	WOUNDED	
FETAHOVIĆ	Rešo	Čamil	07/03/1956	Male	WOUNDED	P1053,pp.4,46; P1898,p.4/P1869,p.4(duplicates); P461,p.63
FRANKOVIĆ	Ivica				WOUNDED	P1053,pp.4,48
GAŠI	Mirsad			Male	WOUNDED	P1053,pp.4,47; P1898,p.16/P1869,p.15(duplicates)(FNMistrad); P461,p.64
GASAJ	Hamdija			Male	WOUNDED	P1053,pp.4,50; P1898,p.8/P1869,p.10(duplicates)
GAVRANOVIĆ	Nedim			Male	WOUNDED	P1053,pp.4,43; AF256; P1898,p.3/P1869,p.1(duplicates)
GOJAK	Alija	Šemso	22/08/1956	Male	KILLED	P1053,pp.4,42,48; P1898,p.12/P1869,p.5(duplicates); P1872,p.1
GUSIC	Munib				WOUNDED	P1053,pp.4,48
HADČIABDIĆ	Omer			Male	WOUNDED	P1053,pp.4,45; AF254; AF255; P1898,p.1/P1869,p.3(duplicates)
HAIRO	Vehid	30-dec-68	30/12/1968	Male	WOUNDED	P1053,pp.4,51; P1898,p.14/P1869,p.12(duplicates)
HALILOVIĆ	Hamdija				WOUNDED	P1053,pp.4,50
HALILOVIĆ	KEMO			Male	WOUNDED	P1053,pp.4,48(FNKemal); P1898,p.13/P1869,p.6(duplicates)
HAMZA	Ismet				WOUNDED	P1053,pp.4,50
HAMZA	Tema				WOUNDED	P1053,pp.4,50
HASAGIĆ	Amri			Male	WOUNDED	REDACTED; P1243,p.1
HATIBOVIĆ	Hamdija				WOUNDED	P1053,pp.4,46
HODŽIĆ	Selvedin	Mirsad	01/01/1977	Male	WOUNDED	P1053,pp.4,48; P1898,p.13/P1869,p.6(duplicates); P461,p.61
HUSKIĆ	Hamdo			Male	WOUNDED	P1053,pp.4,44; P1898,p.10/P1869,p.7(duplicates)
HUSKIC	Nezir			Male	WOUNDED	P1053,pp.4,43; P1898,p.3/P1869,p.1(duplicates)
IMAMOVIĆ	Akif				WOUNDED	P1053,pp.4,48
IMAMOVIĆ	Haris				WOUNDED	P1053,pp.4,47
IMAMOVIĆ	Jasman				WOUNDED	P1053,pp.4,45
ISLAMOVIĆ	Benis				WOUNDED	P1053,pp.4,45

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
JACEVIC	Nermin				WOUNDED	P1053,pp.4,45
JAKŠIĆ	Vladimir	Vase	20/04/1947	Male	WOUNDED	P1053,pp.4,44; P1898,p.11/P1869,p.8(duplicates)
JAMAKOVIĆ	Rasid				WOUNDED	P1053,pp.4,44; D1272,p.1
JASAR	Jasminko				WOUNDED	P1053,pp.4,51; D1272,p.1
KADRIĆ	Dzemo		22/09/1974	Male	WOUNDED	P1053,pp.4,45; P1898,p.2/P1869,pp.3,12(duplicates)
KADRIĆ	Zufer			Male	WOUNDED	P1053,pp.4,47; P1898,p.16/P1869,p.14(duplicates); P461,p.60
KALAFAT	Asim			Male	WOUNDED	P1053,pp.4,43; P1898,p.3/P1869,p.1(duplicates)
KALAMUJIĆ	Elmir				WOUNDED	P1053,pp.4,43
KATAVIĆ	Miodrag				WOUNDED	P1053,pp.4,50
KATONIĆ	Miodrag				WOUNDED	P1053,pp.4,46
KEKETOVIĆ	Elvir				WOUNDED	P1053,pp.4,49
KOŽO	Raif			Male	WOUNDED	P1053,pp.4,51; P1898,p.14/P1869,p.12(duplicates)
KRAJČIN	Subhin				WOUNDED	P1053,pp.4,47
KRUPALIJA	Ramiz				WOUNDED	P1053,pp.4,45
KRVAVAC	Davor	Momir	08/03/1980	Male	WOUNDED	P1053,pp.4,45; P1898,p.2/P1869,p.3(duplicates)
LIGATA	Hajrudin	Alija	16/10/1965	Male	WOUNDED	P1053,pp.4,43; P1898,p.3/P1869,p.1(duplicates)
LJUBAS	Mišo	Marko	11/06/1950	Male	WOUNDED	P1053,pp.4,46; P1898,p.5/P1869,p.5(duplicates)
MANKO	Admir				WOUNDED	P1053,pp.4,47
MANKO	Adnan				WOUNDED	P1053,pp.4,44
MATOVIC	Miodrag				WOUNDED	P1053,pp.4,51
MIRVIĆ	Adnan	Adil	08/06/1977	Male	KILLED	P1053,pp.4,42,46; P1898,p.5(FNIllegible)/P1869,p.5(duplicates); P1872,p.1
MIRDIĆ	Muamer		01/01/1979	Male	WOUNDED	P1053,pp.4,51; REDACTED; P1898,p.14/P1869,p.12(duplicates); P1243,p.2; P461,p.63; P818,p.12
MIRDIĆ	Muhamed				WOUNDED	P1053,pp.4,50

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
MUTAPČIĆ	Jusuf	Husein	01/06/1960	Male	WOUNDED	P1053,pp.4,45; P1898,p.1/P1869,p.3(duplicates)
MUTAPČIĆ	Muamer				WOUNDED	P1053,pp.4,45
MUZAIĆ	Ferid	Ramadan	17/06/1977	Male	WOUNDED	P1053,pp.4,44; REDACTED; P1898,p.11/P1869,p.8(duplicates)(FNHUZAIĆ); P1053,p.44; P1243,p.2(LNNUZAIĆ)
OGLEČEVAC	Omer			Male	WOUNDED	P1053,pp.4,44; P1898,p.10/P1869,p.7(duplicates)
OMERAGIĆ	Almir	Šučro	19/01/1973	Male	WOUNDED	P1053,pp.4,47; P1898,p.17/P1869,p.15(duplicates)
OMERAGIĆ	Azem				WOUNDED	P1053,pp.4,47
OMIČEVIĆ	Senad			Male	WOUNDED	P1053,pp.4,44; P461,p.61; P462,p.2; P1869,p.7/P1898,p.10(duplicates)
OSADČIJI	Dragan	Antun	02/09/1966	Male	KILLED	P1053,pp.4,42,46; P1898,p.5/P1869,p.5(duplicates); P1872,p.1; P463,p.9
OSMANOVIĆ	Fadil				WOUNDED	P1053,pp.4,45
PAJIĆ	Miroslav				WOUNDED	P1053,pp.4,44
PASKARADA	Jakub				WOUNDED	P1053,pp.4,45
PERIŠIĆ	Goran			Male	WOUNDED	P1053,pp.4,45
PRPIC	Miroslav				WOUNDED	P1053,pp.4,51
RADACA	Izet				WOUNDED	P1053,pp.4,48
RAMIĆ	FNU			Unknown	KILLED	P1053,pp.4,42,46(FNRefik); P1898,p.5/P1869,p.5(duplicates)
RAZIĆ	Jusuf			Male	KILLED	P1053,pp.4,42,48; P1898,p.12/P1869,p.5(duplicates); P1872,p.1
RENER	Robert			Male	WOUNDED	P1053,pp.4,48(LNRESNER); P1898,p.13/P1869,p.6(duplicates)
ROVCANIN	Almedin				WOUNDED	P1053,pp.4,48
SABANOVIĆ	Munir				KILLED	P1053,pp.4,42,51
SAHAT	Hasan				WOUNDED	P1053,pp.4,44
SAMIR	Cano				WOUNDED	P1053,pp.4,45
SELMANOVIĆ	Adel			Male	KILLED	P1053,pp.4,42; P1898,p.14/P1869,p.12(duplicates)
SKEJOVIĆ	Nusret				WOUNDED	P1053,pp.4,47
SKOPLJAK	Igor		01/01/1974	Male	WOUNDED	P1053,pp.4,49; REDACTED; P1243,p.2
SKULJ	Izet				WOUNDED	P1053,pp.4,50

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
SMAJIĆ	Amir		06/06/1954	Male	WOUNDED	P1053,pp.4,47; P1898,p.16/P1869,p.15(duplicates); P461,p.62
SMAJIĆ	Nermin			Male	WOUNDED	P1053,pp.4,43; P1898,p.3/P1869,p.1(duplicates)
SOLAJA	FNU (Vladimir or Damjela)			Male	WOUNDED	P1053,pp.4,49; P1898,p.6/P1869,p.9(duplicates); P461,p.61
SUĆUROVIĆ	Ferid			Male	WOUNDED	P1869,p.9/P1898,p.7(duplicates)
SULJAGIĆ	Adnan	Numa	09/02/1974	Male	WOUNDED	P1053,pp.4,50; P1898,p.8/P1869,p.11(duplicates)
TANKOVIĆ	Ivica				WOUNDED	P1053,pp.4,47
TOJIĆ	Miodrag			Male	WOUNDED	P1053,pp.4,47; P1898,p.13/P1869,pp.5,14(duplicates)(LNTOLIĆ)
TRAMPA	Kemal			Male	WOUNDED	P1053,pp.4,51; P1898,p.14/P1869,p.12(duplicates)
TRAMPA	Salem				WOUNDED	P1053,pp.4,51
TREBO	Damir	Muhamed	08/11/1965	Male	KILLED	P1053,pp.4,42,51; P1898,p.14/P1869,p.12(duplicates); P1872,p.1; P463,p.9
TRLE	Kasim	Meho	02/09/1950	Male	WOUNDED	P1053,pp.4,46; P1898,p.4/P1869,p.5(duplicates)
TURAN	Jasmin				WOUNDED	P1053,pp.4,46
VARATANOVIĆ	Džemaludin	Halid	17/04/1958	Male	WOUNDED	P1053,pp.4,46(FNDžemal); P1898,p.4/P1869,p.4(duplicates)(FNDžemal)
VASIĆ	NEDELJKO			Male	WOUNDED	P1053,pp.4,44; P1898,p.11/P1869,p.7(duplicates); P461,p.62
VUJNOVIĆ	Vukoje				WOUNDED	P1053,pp.4,47
VUKOJICA	Vussinova				WOUNDED	P1053,pp.4,48
ZAGORICA	Asim	Muhamed	06/11/1953	Male	KILLED	P1053,pp.4,42,46; P1872,p.1; P1869,p.5; P1888,p.1
ZAHIROVIĆ	Esad				WOUNDED	P1053,pp.4,44
ZEČIĆ	Zejna		01/01/1928	Unknown	WOUNDED	REDACTED; P1243,p.1
ZORNIĆ	Eldin				WOUNDED	P1053,pp.4,50
ZRONIC	Elvir				WOUNDED	P1053,pp.2-4,12-24,50
Shelling Incident G5						
ČAUŠEVIĆ	Kasim			Male	WOUNDED	P1438,pp.4,46; P1890,p.4; P1887,p.1

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
ČOLAKOVIĆ	Izet			Male	WOUNDED	P1438,pp.4,24,46; P1890,p.5; P1887,p.2
ALIHODŽIĆ	Majda			Female	WOUNDED	P1438,pp.4,46; P1890,p.4
DŽANKOVIĆ	Mirsad				WOUNDED	P1890,p.5
DŽOZO	Hamid			Male	WOUNDED	P1438,pp.4,46; P1890,p.3
DANGUBIĆ	Manojlo			Male	WOUNDED	P1438,pp.4,46; P1890,p.5
DERVIŠEVIĆ	Sadeta				WOUNDED	P1890,p.5
DIZDAREVIĆ	Semija				WOUNDED	P1890,p.5
FAZLIĆ	Dervis			Male	WOUNDED	P1438,pp.4,23,46; P1890,p.4; P1887,p.1
GREBIĆ	Husein	Huso	16/03/1946	Male	WOUNDED	P1438,pp.4,23,46; P1890,p.3; P1887,p.1
JELOVAC	Ilhan			Male	KILLED	P1438,pp.4,46; P463,p.5
KIRLIĆ	Ajdin	Fejsal	29/06/1977	Male	KILLED	P1438,pp.2,3,46; P1890,p.2
KNEHTL	Vinka			Female	KILLED	P1438,pp.4,46; P1890,p.1; P463,p.5
KURIĆ	Fehma			Female	WOUNDED	P1438,pp.4,23,46; P1890,p.5; P1887,p.1
MAHONIĆ	Rasim			Male	WOUNDED	P1438,pp.4,46; AF275; P1890,p.3; P1887,p.2(LNMEHORIC)
MATIĆ	Ljiljana			Female	KILLED	P1438,pp.2,3,46; P1890,p.1
MEHONIĆ	Nedžiba			Female	KILLED	P1438,pp.2,3,3,1,46; P1883
MEHONIĆ	Rahima	Sehrija	19/04/1933	Female	KILLED	P1438,pp.2,3,3,3,46; P1890,p.2; P1884
MEHONIĆ	Sadajeta	Rasim	03/12/1961	Female	KILLED	P1438,pp.2,3,3,4,46; P1890,p.3; P1885
MIĆANOVIĆ	Dragica			Female	KILLED	P1438,pp.2,3,46; P1890,p.2
MILIĆ	Ahmed			Male	WOUNDED	P1438,pp.4,46; P1890,p.3
MRŠOVIĆ	Džulsuna			Female	WOUNDED	P1438,pp.4,46; P1890,p.3
SELIMOVIĆ	Sulejman	Nasuf	05/10/1929	Male	KILLED	P1438,p.2,3,35,46; P1890,p.3; P1886
SIMIĆ	Zora			Female	KILLED	P1438,pp.2,3,36,46; P1890,p.2
TALIĆ	Enisa	Uzeir	30/01/1944	Female	KILLED	P1438,pp.2,3,46; P1890,p.2
TALIĆ	Ibro				KILLED	P1438,pp.2,3,46
TASLAMAN	Enver			Male	WOUNDED	P1438,pp.4,25,46; AF276; P1890,p.3
TURHAN	Enes			Male	WOUNDED	P1438,pp.4,46; P1890,p.4
TVRTKOVIĆ	Jasminka	Ivan	29/03/1946	Female	KILLED	P1438,pp.2,29; P1882
TVRTKOVIĆ	Jasna			Female	KILLED	P1438,pp.2,3,46; P1890,p.1
TVRTKOVIĆ	Stela			Female	KILLED	P1438,pp.2,3,27,46; P1890,p.1; P1881
Shelling Incident G6						
AHMETHOĐIĆ	Admir		01/01/1982	Male	WOUNDED	P1443,pp.2,3,5,15,16/P2169,p.1(duplicateofP1443,p.5); P1236,p.1
AHMETHOĐIĆ	Elvir		01/01/1980	Male	WOUNDED	P1443,pp.2,3,5,15/P2169,p.1(duplicateofP1443,p.5); P1236,p.2

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
BRKović	Indira				KILLED	P1443, pp.2,4,6,8,15,16/P1696(duplicateofP1443,p.8)/P2169,p.2(duplicateofP1443,p.6)
BRKović	Jasmina				KILLED	P1443, pp.2,4,6,8,15,16/P1696(duplicateofP1443,p.8)/P2169,p.2(duplicateofP1443,p.6)
DEDOVIĆ	Mirza				KILLED	P1443, pp.2,4,6,8,15,16/P1696(duplicateofP1443,p.8)/P2169,p.2(duplicateofP1443,p.6)
JURENIĆ	Daniel			Male	KILLED	P1443, pp.2,3,5,8,11,15,16/P1696(duplicateofP1443,p.8)/P2169,p.1(duplicateofP1443,p.5)(L/NJURIN IC)
KAPETANOVIĆ	Muhamed			Male	WOUNDED	P1443, pp.2,4,6,15,16/P2169,p.2(duplicateofP1443,p.6)
RIZVANOVIĆ	Nirman			Male	KILLED	P1443, pp.2,4,6,8,15,16/P1696(duplicateofP1443,p.8)/P2169,p.2(duplicateofP1443,p.6)(FNNermin)
SARAC	Samir			Male	WOUNDED	P1443, p.15,16
SUBAŠIĆ	Admir			Male	KILLED	P1443, pp.2,4,6,8,11,15,16/P1696(duplicateofP1443,p.8)/P2169,p.2(duplicateofP1443,p.6)
TODOROVIĆ	Goran			Male	WOUNDED	P1443, pp.4,14,15,16
TOPEL	Nedžad			Male	WOUNDED	P1443, pp.2,4,6,13,15,16/P2169,p.2(duplicateofP1443,p.6)
Shelling Incident G7						
ŠITO	Aiša			Female	KILLED	P1710, pp.1,3,6,7,50-51,75
ŠITO	Fatima			Female	KILLED	P1710, p.70
BALIČEVAĆ	Refko			Male	WOUNDED	P1710, pp.4,6,24,77/P1878,p.4(partialduplicate)
BALIČEVAĆ	Saida			Female	KILLED	P1710, pp.1,3,6,46-47,75
BARIŠIĆ	Pero			Male	WOUNDED	P1710, pp.4,23,77/P1878,p.3(partialduplicate)
BEGIĆ	Fuad			Male	WOUNDED	P1710, pp.4,6,23,77/P1878,p.3(partialduplicate)
BULEVAC	Refka			Female	WOUNDED	P1710, p.4,77
DŽANKO	Zumran (Zumreta)	Ismet	03/08/1933	Unknown	WOUNDED	P1710, pp.4,6,35,70,77
DUBINJA	Huskija				KILLED	P1710, p.21/P1878, p.1 (partialduplicate)
EKMEČIĆ	Jadranka			Female	WOUNDED	P1710, pp.4,6,23,77/P1878, p.3 (partialduplicate)
HADŽIBEGIĆ	Šefika			Female	WOUNDED	P1710, p.4,77
HAFIZOVIĆ	Eldar			Male	WOUNDED	P1710, pp.4,6,57,77

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
HALILOVIĆ	Šefko			Male	WOUNDED	P1710,pp.3,6,21,77/P1878,p.1 (partialduplicate)
HASANOVIĆ	Sevda			Female	WOUNDED	P1710,pp.4,6,34,53-54,77
HEBIBOVIĆ	Osmo			Male	WOUNDED	P1710,pp.4,6,22,77/P1878,p.1 (partialduplicate)(FN Osman)
JABUČAR	Vezira			Female	WOUNDED	P1710,pp.4,6,32-33,62,77
KADRIĆ	Zahida			Female	WOUNDED	P1710,pp.4,6,22,63,77/P1878,p.2 (partialduplicate)
KOLAR	Emin		10/03/1937	Male	KILLED	P1710,pp.1,3,5,7,48-49,75
LJUSA	Sabaudin			Male	WOUNDED	P1710,pp.6,22,27,55,59,77/P1878,p.1 (partialduplicate)(FNSabahudin); P818,p.22; P1024
MAKSIMOVIĆ	Rajko			Male	WOUNDED	P1710,pp.4,6,36,55,72-73,77
MEHIČEVIĆ	Refik			Male	WOUNDED	P1710,pp.3,6,77(LNMALIČEVIĆ)
MUŠANOVIĆ	Arif			Male	WOUNDED	P1710,p.4,77
MUČANOVIĆ	Atif			Male	WOUNDED	P1710,pp.4,6,28-31,55,77(LNMUŠANOVIĆ); P462,p.15
MUSTAGRUDIĆ	Enver		13/02/1942	Male	KILLED	P1710,pp.1,3,5,7,43-45,75; P1878,p.1
OMERSPAHIĆ	Azra		19/11/1972	Female	WOUNDED	P1710,pp.4,6,25,68-69,70,77/P1878,p.5 (partialduplicate)
PRIBINJA	Muškića			Male	KILLED	P1710,pp.1,3,6,70,75,77; P463,p.13
SABAHUDIN	Ljuša			Unknown	KILLED	P1710,pp.1,3,75
SOKOLAR	Refik			Male	WOUNDED	P1710,pp.4,6,25,77/P1878,p.5 (partialduplicate)
SPAHIĆ	Fata	Mujo	05/05/1947	Female	WOUNDED	P1710,pp.4,6,22,66,70,77/P1878,p.2 (partialduplicate)e)
SPAHIĆ	Mirsad			Male	KILLED	P1710,pp.1,3,6,75; P463,p.13
SPAHIĆ	Selima	Ibro	08/05/1984	Female	KILLED	P1710,p.1,6,7,41-42/P1878,p.1 (partialduplicate)
TENŽERA	Jadranka			Female	KILLED	P1710,pp.1,3,5,7,38-40,55,75/P1878,p.1 (partialduplicate)
Shelling Incident G8						
ŠABANOVIĆ	HASIB	SALIKO	06/12/1948	Male	KILLED	P2047,p.2
ŠABANOVIĆ	Orhan	Hasib	03/06/1976	Male	WOUNDED	P2047,p.6
ŠAHOVIĆ	Zajko	Salih	02/10/1960	Male	WOUNDED	P2047,p.5
ŠATOROVIĆ	MELIHA			Female	WOUNDED	P1237,p.1
ŠEHAJRAKTAREVIĆ	AHMED	MUSTAFA	10/10/1940	Male	KILLED	P2047,p.2
ŠETA	Himzo	Halid	13/01/1955	Male	WOUNDED	P2047,p.3

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
ŠIJAK	Emir	Remzo	08/03/1975	Male	WOUNDED	P2047,p.4
ŠKRJELJ	Bejto	FAZLIJA	11/02/1942	Male	KILLED	P2047,p.1(FNBejto); P1973,p.9
ŠUBAŠIĆ	Mušan	Rasim	20/10/1947	Male	WOUNDED	P2047,p.4
ŠUVALIJA	Kenan	Nedžib	31/08/1974	Male	WOUNDED	P2047,p.5; A.BEGIĆ:P2050,para.7
ČELJO	Safija		01/01/1949	Unknown	WOUNDED	P1237,p.5; P1244,pp.6-10; REDACTED;
ČENAN	Ruža			Female	WOUNDED	P2047,p.3; P1238,p.1
ČERIĆ	Hamijeta		25/12/1936	Female	WOUNDED	P2047,p.3; P1238,p.4
ČLIMIDŽIĆ	VERICA	RAMIZA	14/03/1959	Female	KILLED	P2047,p.1; P1973,p.9
ČOSIĆ	ZLATKO	BORIVOJE	30/07/1961	Male	KILLED	P2047,p.2
ČEHAJIĆ	ALMASA	MEHO	18/05/1958	Female	KILLED	P2047,p.1; P1973,p.9
ČELIK	Muradif	Šaban	29/04/1939	Male	WOUNDED	P2047,p.4; P1244,pp.1-5; REDACTED; A.BEGIĆ:P2050,para.7
ČEVRIZ	JELENA	ANDELKO	01/01/1959	Female	KILLED	P2047,p.2(LNČARVIZ)
ČOLOVIĆ	Emina	Zahir	17/11/1945	Male	WOUNDED	P2047,p.6
ČOMOR	Dževad	Duran	12/01/1970	Unknown	WOUNDED	P2047,p.4
ČUKOJEVIĆ	ALJJA	ZEJNIL	10/05/1934	Male	KILLED	P2047,p.2
ČUSTO	Safet	Sejdo	05/12/1929	Male	WOUNDED	P2047,p.6
ABAZ	Avdija	Mušan	18/05/1924	Unknown	WOUNDED	P2047,p.4
ABAZ	Zekira	Ahmed	11/01/1955	Female	WOUNDED	P2047,p.6
ADILOVIĆ	Himzo	Hilmijo		Male	WOUNDED	P1244,pp.11-14; REDACTED; P1238,p.1
ALJKIĆ	Isma			Unknown	WOUNDED	P2047,p.7(LNALUKIĆ)
ALJUKIĆ	Irma			Female	WOUNDED	P2047,p.4
ARNAUTOVIĆ	Bahrija	Hamdija	22/12/1949	Unknown	WOUNDED	P2047,p.6
ARNAUTOVIĆ	SENAD	SAFET	03/04/1953	Male	KILLED	P2047,p.2
BAŠIĆ	Nejla	Fehim	21/08/1991	Female	WOUNDED	P2047,p.6
BABIĆ	IBRAHIM	MEHO	01/10/1950	Male	KILLED	P2047,p.2
BABIĆ	Vedmir			Male	WOUNDED	P2047,p.5
BABOVIĆ	Hašim	Zulfo	01/02/1946	Male	WOUNDED	P2047,p.4
BAJRAKTAREVIĆ	Behija	Saćir	01/03/1949	Male	WOUNDED	P2047,p.3; P1238,p.5
BAJRAKTAREVIĆ	Pasan	Hasan	03/12/1930	Male	WOUNDED	P2047,p.5
BANDA	Hasan	Selim	30/10/1956	Male	WOUNDED	P2047,p.6
BARAKOVAC	Halima	Hašim	22/04/1953	Female	WOUNDED	P2047,p.6
BARUČIJA	MEHMED	MURAT	17/11/1959	Male	KILLED	P2047,p.1; P1973,p.9
BEŠIĆ	Vahida	AVDIJA	22/03/1954	Female	KILLED	P2047,p.1; P1973,p.9
BEGIĆ	ĆAMIL	MUJO	31/03/1938	Male	KILLED	P2047,p.3; A.BEGIĆ:P2050,paras.3,4,6; A.BEGIĆ:T.9966; P2053; P2055
BEGIĆEVIĆ	Rifat	Mehmed	01/11/1933	Male	WOUNDED	P2047,p.7

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
BEGLEROVIĆ	Samira			Female	WOUNDED	P2047,p.3
BEGOVIĆ	EMIR	MUSTAFA	18/09/1964	Male	KILLED	P2047,p.2
BOŠKAILO	Ezrema	Mumina	06/05/1958	Female	WOUNDED	P2047,p.5
BOGDANOVIĆ	GORDANA	DRAGO	16/04/1951	Female	KILLED	P2047,p.2
BOJINOVIĆ	VASKRSIJE	STEVAN	15/09/1935	Male	KILLED	P2047,p.2
BOROVINA	MUHAMED	HALIL	10/12/1953	Male	KILLED	P2047,p.2; A.BEGIĆ:P2050,para.7
BRADIĆ	Medina	Zekija	07/01/1969	Female	WOUNDED	P2047,p.5
BRDARIĆ	Sakiba	Jusuf	26/11/1956	Female	WOUNDED	P2047,p.4
BRKANIĆ	FARUK	ABDULAH	01/01/1947	Male	KILLED	P2047,p.1; P1973,p.9
BULBUL	SAKIB	AVDO	15/06/1936	Male	KILLED	P2047,p.1; P1973,p.9
BUNTIĆ	Vlatko	Ilija	07/02/1933	Male	WOUNDED	P2047,p.6
DŽAFERAGIĆ	Galib	Zahid		Male	WOUNDED	P2047,p.6
DŽAKA	Fatima	Murat	23/08/1939	Female	WOUNDED	P2047,p.4
DŽEBO	KEMAL	IBRAHIM	06/06/1938	Male	KILLED	P2047,p.2
DŽUHO	Nermin	Salko	21/04/1971	Male	WOUNDED	P2047,p.4
DAJŽIĆ	Aldijan	Alija	01/01/1980	Male	WOUNDED	P2047,p.5
DAJŽIĆ	Enis	Vejsil	03/04/1952	Male	WOUNDED	P2047,p.5(FNEnisa)
DAMJANOVIĆ	FNU	Ivan		Unknown	WOUNDED	P2047,p.4(FNivan)
DELIĆ	SMILJA	STOJAN	28/08/1954	Female	KILLED	P2047,p.2
DELJKOVIĆ	Ajša	Medo	10/03/1941	Unknown	WOUNDED	P2047,p.6
DERVIŠEVIĆ	Muhamed	Avdo	04/11/1932	Male	WOUNDED	P2047,p.5
DJANKO	Djemka	Ramo	27/08/1933	Female	WOUNDED	P2047,p.6
DRINJAKOVIĆ	Enes	Nasuf	25/03/1957	Male	WOUNDED	P2047,p.4
DRUGOVAC	Avdija			Male	WOUNDED	P2047,p.5
DRUGOVAC	IFET	AVDIJA	01/01/1952	Male	KILLED	P2047,p.2
DUKATAR	Mehmedalija	Muhamed	01/02/1931	Male	WOUNDED	P2047,p.4
DURIĆ	Ramiza			Female	WOUNDED	P2047,p.7
DURIĆ	Senida	Alija	23/10/1960	Female	WOUNDED	P2047,p.5
DURMO	DŽEVAD	ALJA	08/08/1955	Male	KILLED	P2047,p.2
DURMO	FATIMA	ZAHID	20/01/1944	Female	KILLED	P2047,p.2
EFENDIĆ	Rahmana	Rasim	03/12/1957	Female	WOUNDED	P2047,p.4
FAZLIĆ	Ismet	OSMAN	01/05/1925	Male	KILLED	P1973,p.9; P1238,p.2
FEHTAGIĆ	Sead	Mustafa	23/12/1935	Male	WOUNDED	P2047,p.5(LNFEHTAHAGIĆ)
FERHATOBEGOVIĆ	Vejsil	ADEM	03/09/1939	Male	KILLED	P2047,p.2; P1973,p.9; P1238,p.2
FETAHOVIĆ	DŽEVDET	MUSTAFA	01/04/1932	Male	KILLED	P2047,p.1; P1973,p.9
FETAHOVIĆ	MUHAMED	MUSTAFA	09/04/1935	Male	KILLED	P2047,p.1; P1973,p.9
FOČO	AHMED	RAGIB	27/08/1947	Male	KILLED	P2047,p.1; P1973,p.9

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GANOVIĆ	MAIDA	MUSTAFA	22/11/1943	Female	KILLED	P2047,p.3(FNMajda)
GERH	Mirko	Jovan	14/09/1954	Male	WOUNDED	P2047,p.3; P1238,p.8(LNGERN)
GIBOVIĆ	ISMETA	SAHIN	01/01/1958	Female	KILLED	P2047,p.2(FNIsma)
GLJIVA	NAZIF	Ahmed	05/02/1934	Male	WOUNDED	P2047,p.3; P1237,p.8
GUSO	Fahrudin	Sulejman	18/01/1930	Male	WOUNDED	P2047,p.6
GUTA	SEJDA	Muradif	03/01/1947	Female	WOUNDED	P2047,p.3; P1237,p.4; P1238,p.4
HADŽIĆ	Salih			Male	WOUNDED	P1238,p.8
HADŽIĆ	Vasvija	Zahid	28/10/1957	Female	WOUNDED	P2047,p.4
HADŽIHASANOVIĆ	Amir	Fahro	20/09/1976	Male	WOUNDED	P2047,p.5
HADŽISMAJLOVIĆ	Azra	Ibrahim	15/11/1947	Female	WOUNDED	P2047,p.4
HADJAREVIĆ	Mejra			Female	WOUNDED	P2047,p.3; P1238,p.8
HAJRIĆ	Rasema	Avdo	13/03/1932	Female	WOUNDED	P2047,p.5
HAROVIĆ	Fikreta	Buto	14/03/1940	Female	WOUNDED	P2047,p.4
HASANOVIĆ	RASEMA	SALJH	11/05/1951	Female	KILLED	P2047,p.2
HASANOVIĆ	Selvar (Selver)	Hasan		Male	WOUNDED	P1244,pp.31-35; REDACTED; P1238,p.1
HASKOVIĆ	Hilimija	Šećo	11/04/1952	Unknown	WOUNDED	P2047,p.6
HEČAM	Ahmed	Salih	19/02/1932	Male	WOUNDED	P2047,p.6(LNHEČAN)
HELAĆ	Haris	Esad	22/05/1978	Male	WOUNDED	P2047,p.4
HODŽIĆ	Esmira	Rašid		Female	WOUNDED	P2047,p.3; P1237,p.2; P1244,pp.19-22; REDACTED;
HODŽIĆ	Rasim	Mehmed	27/12/1952	Male	WOUNDED	P2047,p.4
HODŽIĆ	Salih			Male	WOUNDED	P2047,p.4
HODŽIĆ	Salko	Avdo	12/02/1954	Male	WOUNDED	P2047,p.6
HRELJIĆ	Salko	Ćamil		Male	WOUNDED	P2047,p.4; P1244,pp.23-25; REDACTED; P1238,p.6
HRKOVIĆ	Mustafa	Jašar	16/02/1941	Male	WOUNDED	P2047,p.5
HUBIJAR	Mula	Mušan	24/04/1949	Unknown	WOUNDED	P2047,p.4
HURKO	Alija	IDRIZ	06/09/1937	Male	KILLED	P2047,p.1; P1973,p.9(LNHUKO)
IBRULJ	MIRSADA	REFIK	27/04/1953	Female	KILLED	P2047,p.1; P1973,p.9
IMAMOVIĆ	Ismet	Hamdija	20/05/1955	Male	WOUNDED	P2047,p.6
IMAMOVIĆ	Mejra		01/01/1954	Unknown	WOUNDED	P2047,p.5
IMANIĆ	MUSTAFA	ALJJA	11/05/1946	Male	KILLED	P2047,p.1; P1973,p.9
IMANIĆ	Sabira	Enis	21/01/1940	Female	WOUNDED	P2047,p.6
JAŽIĆ	RASEMA	RASIM	17/01/1935	Female	KILLED	P2047,p.1; P1973,p.9
JAZVIN	Mustafa		02/10/1933	Male	WOUNDED	P2047,p.3; P1238,p.4
JOKSIMOVIĆ	Marija	Milan	08/07/1935	Female	WOUNDED	P2047,p.3
JOKSIMOVIĆ	Radoje	Glgorije	13/01/1938	Male	WOUNDED	P1238,p.6

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JUNUZOVIĆ	RAZIJA	FIKRET	01/01/1953	Female	KILLED	P2047,p.2
KAHRICA	Kasim	Ramiz	04/04/1931	Male	WOUNDED	P2047,p.6
KALIMAN	Čazim	Vesilj	18/06/1959	Male	WOUNDED	P2047,p.7
KAPO	Nezira	Haili		Female	WOUNDED	P2047,p.3; P1238,p.8
KARALIĆ	Slobodan			Male	WOUNDED	P2047,p.4
KARAVDIĆ	HASNIJA	OSMAN	24/02/1959	Female	KILLED	P2047,p.3(FNHasija)
KAZIJA	Hasan	Mustafa	01/01/1925	Male	WOUNDED	P2047,p.5
KLAČAR	MLADEN	JEFTO	14/04/1937	Male	KILLED	P2047,p.1; P1973,p.9
KNEŽEVIĆ	MARIJA	BRANKO	04/06/1957	Female	KILLED	P2047,p.1; P1973,p.9
KORISTOVIĆ	Kenana	Alija	16/07/1958	Female	WOUNDED	P2047,p.4
KORORA	Hasib	Meho	15/07/1930	Male	WOUNDED	P2047,p.6
KOSO	Mugdin	Nezir	21/11/1956	Male	WOUNDED	P2047,p.3; P1531,p.1
KOVAČ	SELMA	SULEJMAN	19/01/1953	Female	KILLED	P2047,p.2
KOVAČEVIĆ	Abid	Šaho	27/02/1934	Male	WOUNDED	P2047,p.5
KOVAČEVIĆ	Kerim	Safet		Male	WOUNDED	P2047,p.6
KRAJČIN	IBRO	NAHOD	05/06/1941	Male	KILLED	P2047,p.1; P1973,p.9
KRALJEVIĆ	Dušan	Zdravko	02/10/1974	Male	WOUNDED	P2047,p.6
KUKAVICA	Šefik	Hailid	04/04/1938	Male	WOUNDED	P2047,p.3; P1237,p.3; P1244,pp.49-51; REDACTED;
KUNIĆ	SEJDA	AVDIJA	02/08/1952	Female	KILLED	P2047,p.2
KVESIĆ	Jozo	IVAN	16/08/1940	Male	KILLED	P2047,p.2; P1973,p.10; P1238,p.2
LAKAČA	NUMO	ŠEFKO	06/12/1926	Male	KILLED	P2047,p.1
LAZOVIĆ	Dževad	Mustafa	25/12/1935	Male	WOUNDED	P2047,p.5
LNU	SEJDA			Female	WOUNDED	P1237,p.6; P1238,p.6(LNLJUŠA)
LUCIĆ	Selva			Female	WOUNDED	P2047,p.5
LUTVIĆ	Mejra			Female	WOUNDED	P2047,p.3; P1244,pp.26-30; REDACTED; P1238,p.5(LNLUTIĆ)
MALOVIĆ	RUŽA	ZIVKO	15/08/1945	Female	KILLED	P2047,p.1(FNRužo); P1973,p.9
MEKIĆ	Himzo	Selim	13/09/1958	Male	WOUNDED	P2047,p.3
MEMIŠEVIĆ	Hasiba			Female	WOUNDED	P2047,p.4
MILANOVIĆ	Milenko	Milan	25/02/1965	Male	WOUNDED	P2047,p.4
MINIĆ	JADRANKA	MILETA	01/01/1954	Female	KILLED	P2047,p.2
MUŠIĆ	Safet			Male	WOUNDED	P2047,p.5
MUJIĆINOVIĆ	Mejra	Mujo	08/09/1961	Female	WOUNDED	P2047,p.4
MUJARIĆ	Avdija	Kasim	25/09/1957	Male	WOUNDED	P2047,p.6
MUJARIĆ	Rifet	Ibrahim	15/09/1950	Male	WOUNDED	P2047,p.3
MUSIĆ	Sefer	Rahman	08/08/1950	Male	WOUNDED	P2047,p.6

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ODŽAK	NURA	AVDO	04/03/1941	Female	KILLED	P2047,p.1; P1973,p.9; A.BEGIĆ:P2050,para.7
OLOVČIĆ	Hamid		12/09/1944	Male	WOUNDED	P1244,pp.36-39; REDACTED; P1238,p.5
ORMAN	MEJRA	JUSUF	08/04/1931	Female	KILLED	P2047,p.2
ORUČEVIĆ	HAJRIJA	AHMED	16/03/1944	Female	KILLED	P2047,p.2
OSMANOVIĆ	Husein	Velija	11/09/1958	Male	WOUNDED	P2047,p.3; P1238,p.5
OSMANOVIĆ	Velija	Hašim	05/09/1932	Male	WOUNDED	P2047,p.6
PECIKOZA	Idriz	Ibro	01/03/1913	Male	WOUNDED	P2047,p.6
PEJANOVIĆ	Miće	Zarko	28/07/1926	Male	WOUNDED	P2047,p.3; P1238,p.1
PELJTO	Edhem	Sačir	01/07/1946	Male	WOUNDED	P2047,p.7
PIRBO	Hasan	Suljo	16/06/1933	Male	WOUNDED	P2047,p.6
PROZORAC	SEID	MEHO	18/12/1941	Male	KILLED	P2047,p.2
PUŠKA	Danko	Salko		Male	WOUNDED	P2047,p.5
RAHIĆ	Smajo	Ibro	27/07/1929	Male	KILLED	P2047,p.1; P1973,p.9
RAJČEVIĆ	Vladan	Danilo	27/08/1982	Male	WOUNDED	P2047,p.7
RAONIĆ	Hasiba	Mešo	10/05/2026	Female	WOUNDED	P2047,p.6
REHAR	IGOR	DAVOR	25/03/1972	Male	KILLED	P2047,p.2
RIZVO	SABIT	SULJO	28/02/1926	Male	KILLED	P2047,p.1; P1973,p.9
SABLJA	ZAHIDA	MUHAREM	17/09/1941	Female	KILLED	P2047,p.1; P1973,p.9
SADIKOVIĆ	Mehmed	Safet	14/08/1930	Male	WOUNDED	P2047,p.6
SALIHAGIĆ	Nihad	Mehmed	17/11/1963	Male	WOUNDED	P2047,p.7
SALJHOVIĆ	Hadžira	Mujo	18/05/1938	Female	WOUNDED	P2047,p.6
SALJHOVIĆ	Nedžad	IBRAHIM	29/08/1971	Male	KILLED	P2047,p.1; P1973,p.9
SATROVIĆ	Merima	Nail	24/01/1973	Male	WOUNDED	P2047,p.3; P1244,pp.15-18; REDACTED;
SEJDIĆ	Dino			Male	WOUNDED	P2047,p.5
SEJDIĆ	Zina	Omer	06/05/1959	Female	WOUNDED	P2047,p.5
SELAK	ĐEMILA	Adil	13/01/1935	Female	WOUNDED	P2047,p.3; P1237,p.7; P1238,p.6
SIJERČIĆ	Ferid	Mustafa	29/05/1928	Male	WOUNDED	P2047,p.6
SIPOVIĆ	Enes	Nezir		Male	WOUNDED	P1244,pp.40-44; REDACTED; P1238,p.4
SKAMO	Asim	Muharem	10/01/1934	Male	WOUNDED	P2047,p.6
SMAJIĆ	Adisa			Female	WOUNDED	P2047,p.3; P1238,p.8(LNSMAIĆ)
SMAJIĆ	HAJRIJA	DERVIŠ	25/08/1948	Female	KILLED	P2047,p.2
SOMUN	Zahida	Hasib	08/06/1960	Female	WOUNDED	P2047,p.5
SPAHIĆ	Lejla	Mustafa	02/09/1974	Female	WOUNDED	P2047,p.6
SPAHIĆ	Međiha	Mustafa	04/05/1971	Female	WOUNDED	P2047,p.4
SPAHIĆ	Mejra	Fikret	19/08/1976	Female	WOUNDED	P2047,p.5
SPAHIĆ	Velida	Mustafa	18/02/1976	Female	WOUNDED	P2047,p.5
SPAHOVIĆ	Raza	Kasim	27/07/1972	Unknown	WOUNDED	P2047,p.5

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SRNJA	EMINA	RASIM	10/04/1947	Female	KILLED	P2047,p.2
STANAR	Zeljko	Nedjo	19/09/1944	Male	WOUNDED	P2047,p.5
STANIŠIĆ	Mira		18/04/1946	Female	WOUNDED	P2047,p.6; P1238,p.1
STANOJEVIĆ	Katarina	Nikola	07/02/1935	Female	WOUNDED	P2047,p.4
STUHLIK	Denis	Bruno	20/05/1979	Male	WOUNDED	P2047,p.5
SUŠKIĆ	Sakib	Hasan	17/02/1940	Male	WOUNDED	P2047,p.5
SUBAŠIĆ	DŽEMO	HAMDŽIJA	14/05/1961	Male	KILLED	P2047,p.1; P1973,p.9(LNDžemal)
SUBAŠIĆ	Mušan			Male	WOUNDED	P2047,p.4
SULJAGIĆ	Sabit	Esref	14/11/1950	Male	WOUNDED	P2047,p.6
SULJEVIĆ	SAČIR	HALIL	02/08/1935	Male	KILLED	P2047,p.2
SVRAKIĆ	JUNUZ	ZULFO	25/01/1907	Male	KILLED	P2047,p.1; P1973,p.9
TABAKOVIĆ	Irma			Male	WOUNDED	P2047,p.5
TIHIĆ	PAŠAGA	HASO	08/08/1928	Male	KILLED	P2047,p.2
TOPALBEČIREVIĆ	Ismet	Salih	13/10/1931	Male	WOUNDED	P2047,p.4
TORLAKOVIĆ	Munib	NURIIJA	24/04/1936	Male	KILLED	P2047,p.1; P1973,p.9
TRBIĆ	RUŽDIJA	PAŠO	23/02/1946	Male	KILLED	P2047,p.2; A.BEGIĆ:P2050,para.7
VATRIĆ	Edin	Safet	28/08/1966	Male	WOUNDED	P2047,p.5
VIDOVIĆ	Irena	Nikola	26/04/1940	Female	WOUNDED	P2047,p.4
VITEŠKIĆ	Zaim	Asim	20/11/1960	Male	WOUNDED	P2047,p.5
ZAMETICA	Suad	Subha	31/03/1951	Male	WOUNDED	P2047,p.4
ZAMETICA	Subhija	Husein	30/05/1929	Unknown	WOUNDED	P2047,p.4
ZAZULA	Srdjan	Vladimir	27/09/1957	Male	WOUNDED	P2047,p.4(FNSrdan)
ZEČIĆ	DŽEMIL	ALJJA	01/01/1949	Male	KILLED	P2047,p.1
ZEKIĆ	Hamiz	Džemo	29/05/1953	Male	WOUNDED	P2047,p.5
ZILJIĆ	Esed	Rašid	05/08/1940	Male	WOUNDED	P2047,p.4
ZUBOVIĆ	MUHAMED	OMER	10/11/1944	Male	KILLED	P2047,p.1; P1973,p.9
ZULČIĆ	Šahzija	Mujo	26/10/1936	Female	WOUNDED	P2047,p.3; P1244,pp.45-48; REDACTED; P1238,p.1
ZUNIĆ	SENAD	ISMET	09/03/1957	Male	KILLED	P2047,p.2
Shelling Incident G9						
DELIĆ	Mirsad	Derviš	19/03/1971	Male	KILLED	D554,pp.2,8,29,30/P1317,p.2(partialduplicates)
HANDŽIĆ	HASAN	MAHMUT	04/09/1956	Male	KILLED	D554,pp.2,8,29,30/P1317,p.2(partialduplicates)
HODŽIĆ	RAMIZ		01/01/1932	Male	WOUNDED	D554,pp.3,12-13,17,29,30/P1317,p.3(partialduplicates)/P1246(partialduplicates)/P1253(partialduplicates)

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KIHIC	REMZIJA		18/12/1934	Unknown	WOUNDED	D554,pp.2,14,17-18,29,30/P1317,p.2 (partialduplicates)/P1550(partialduplicates)
KRKA	KASIM		01/01/1928	Male	WOUNDED	D554,pp.3,29,30(FNRasim)/P1317,p.3 (partialduplicates)
LUKŠIJA	SALJHA		22/02/1940	Female	WOUNDED	D554,pp.2,13,16,29,30(FNSalih)/P1317,p.2 (partialduplicates)
MUJKOVIĆ	SAMIR		01/01/1973	Male	WOUNDED	D554,pp.3,29,30/P1317,p.3 (partialduplicates)
PAČARIZ	ISMET		01/01/1963	Male	WOUNDED	D554,pp.2,15,18-19,29,30/P1317,p.2 (partialduplicates)/P1535 (partialduplicates)
SADOVIĆ	ENVERA		01/01/1974	Female	WOUNDED	D554,pp.3,29,30/P1317,p.3 (partialduplicates)
Shelling Incident G10						
ŠUBO	Ziba		01/01/1945	Female	WOUNDED	Z,ŠUBO:P488,p.3; REDACTED;
ČUSTOVIĆ	Ziba	Adem	12/01/1946	Female	KILLED	Z,ŠUBO:P488,p.3; REDACTED;
BRAJLOVIĆ	Šerif		01/01/1984	Male	WOUNDED	REDACTED;
SARAJKIĆ	Gara	Alija	01/01/1955	Female	WOUNDED	REDACTED;
Shelling Incident G11						
GELO	DRAŽEN		01/01/1993	Male	WOUNDED	REDACTED; P1812,p.1
GOTOVAC	Andza (Anda)		01/01/1930	Female	WOUNDED	REDACTED; A.GOTOVAC:P490,pp.4,12; A.GOTOVAC:P489; P1812,p.1; REDACTED;
HRUSTEM	Ajša	Ahmed	07/03/1944	Female	KILLED	P1322,p.2(LNHRUSTAN); REDACTED; REDACTED; P1812,p.1
KUKULJAC	DŽEMAL		01/01/1962	Male	WOUNDED	REDACTED; REDACTED; P1812,p.1
MILETIĆ	IVAN	JOSIP	01/02/2029	Male	KILLED	REDACTED; REDACTED;
TOLIĆ	FRANJO			Male	WOUNDED	REDACTED; REDACTED; P1812,p.1
VUČIĆEVIĆ	IGOR		01/01/1964	Male	WOUNDED	REDACTED; P1812,p.1; REDACTED;
Shelling Incident G12						
HUSEINBEGOVIĆ	Mustafa			Male	WOUNDED	REDACTED;
HUSEINOVIĆ	NEZIR		01/01/1958	Male	KILLED	REDACTED; REDACTED; P1817,p.10(BCSversion)
JAŠAREVIĆ	Enes		29/11/1958	Male	WOUNDED	REDACTED; REDACTED;
JELEČIĆ	GORAN		01/01/1970	Male	WOUNDED	REDACTED; REDACTED;
JURIŠIĆ	LUCIJA		01/01/2029	Female	WOUNDED	REDACTED; REDACTED;
KONAKOVIĆ	FATIMA			Female	WOUNDED	REDACTED; REDACTED;
LOVRIĆ	MIRA		01/01/1946	Female	WOUNDED	REDACTED; REDACTED;

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
PRASKO	SULEJMAN			Male	KILLED	REDACTED; REDACTED; P1817,p.9(BCSversion)
SLATO	SALKO		01/01/1954	Male	WOUNDED	REDACTED; REDACTED;
Shelling Incident G13						
ABAŽA	ADNAN		01/01/1970	Male	WOUNDED	P1913,pp.3,6,14
ANDRIJATA	ALBINA		01/01/1931	Female	WOUNDED	P1913,pp.3,6,14
BEŠIĆ	HARIS		01/01/1995	Male	WOUNDED	P1913,pp.3,6,14
BEGOVIĆ	MUHAREM	Džemal	09/02/1942	Male	WOUNDED	P1913,pp.3,6,14; REDACTED;
BENGIR	HIDA			Female	WOUNDED	P1913,pp.3,6
GAVRILOVIĆ	SLAVICA		01/01/1935	Female	WOUNDED	P1913,pp.3,6,14
HATIĆ	ZAIM		01/01/1933	Male	WOUNDED	P1913,pp.3,6,14
HEVEŠLIJA	ALMA		01/01/1980	Female	WOUNDED	P1913,pp.3,6,14
HEVEŠLIJA	RAMIZ		01/01/1950	Male	WOUNDED	P1913,pp.3,6,14
HUREMOVIĆ	ŠABAN		01/01/1952	Male	WOUNDED	P1913,pp.3,6,14
KUDRA	ŠTEFICA		01/01/2028	Female	WOUNDED	P1913,pp.3,6,14
OSMANOVIĆ	ISMET		01/01/1933	Male	WOUNDED	P1913,pp.3,6,14
OSMANOVIĆ	NURA		01/01/1939	Female	WOUNDED	P1913,pp.3,6,14
PEROVIĆ	NEDŽIB		01/01/1951	Male	WOUNDED	P1913,pp.3,6,14
REDŽEPOVIĆ	Lejla		01/01/1962	Female	WOUNDED	P1913,p.14
REDŽEPOVIĆ	ZIJADA		01/01/1948	Female	WOUNDED	P1913,pp.3,6,14
SALČIN	ŠEFIK		01/01/1955	Male	WOUNDED	P1913,pp.3,6,14
ZAHIRAGIĆ	EMIRA		01/01/1983	Female	WOUNDED	P1913,pp.3,6,14
Shelling Incident G14						
MALJIĆ	MARJA			Female	WOUNDED	P1746,p.1; P1328,p.1
SKALJ	ARMIN			Male	WOUNDED	P1746,p.1; P1328,p.1
SKALJ	IVANKA			Female	WOUNDED	P1746,p.1; P1328,p.1
Shelling Incident G15						
BRZO	MIROSLAV			Male	WOUNDED	REDACTED; P1805,p.2(LNBREZO)
OSMANOVIĆ	SABIT			Male	WOUNDED	REDACTED; P1805,p.2
PARAVLIĆ	ADIL			Male	WOUNDED	REDACTED; P1805,p.2(LNPANAVLIĆ)
PAZINA	Mejra			Female	WOUNDED	REDACTED; REDACTED; P1805,p.2
SALTAGIĆ	DŽEMAL			Male	WOUNDED	REDACTED; P1805,p.2
SMAJIĆ	RASIM			Male	WOUNDED	REDACTED; P1805,p.2
SULJIĆ	ALMEDINA			Female	WOUNDED	REDACTED; P1805,p.2
Shelling Incident G19						

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
ŽIGA	MARINA	ALLJA	09/01/1953	Female	KILLED	P1449, pp.3,9,14/P1909,p.3(partialduplicates)/P1977,p.3(partialduplicates); P740,p.39(FNMerima)
ŠATARA	MINELA	ŠEVKO	28/05/1982	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1233,p.17
ŠATROVIĆ	HAIRO	VELIJE	16/10/1938	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.30
ŠIMUNOVIĆ	ANDRIJA	BARIŠA	07/07/1944	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates)
ĆULESKER	FATIMA	KARAHMET	12/04/1946	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1230,p.3
ČOLIĆ	Razija			Unknown	KILLED	P1449, pp.4,10/P1909,p.4(partialduplicates); P740,p.44
ČORAMBEGIĆ	ESAD	HAMDUIE	29/04/1960	Male	KILLED	P1449, pp.3,9,14(LNČORMAMMBEGIĆ)/P1909,p.3(partialduplicates)/P1977,p.3(partialduplicates); P740,p.38
ADEMOVIĆ	MIRSAD		01/01/1979	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates)
AHMETOVIĆ	AMERISA	VAHID	03/06/1978	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1233,p.26
AHMETOVIĆ	MEHMED	HRUSTO	04/07/1950	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1230,p.2
AJANOVIĆ	OMER	HALILA	07/05/1962	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.20
ALIĆ	HIDAJET	SULEJMANA	23/09/1954	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.24
ALIĆ	SALKO	ARIFA	15/02/1928	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.18
ALIHODŽIĆ	ŠEMSA	MUSTAFA	12/04/1929	Female	WOUNDED	P1531, pp.1,36; B.NAKAŠ:P1525,para.94; P1233,p.38
BAŠEVIĆ	Zeno	Ahmeta	05/04/1949	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.5,9
BAJRIĆ	FERIDA	NIJAZIJA	02/05/1940	Female	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1228,p.4-5
BEĆIREVIĆ	BERINA	ABID	10/01/1991	Unknown	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1233,p.27
BEGIĆ	MUHIDIN	IBRAHIM	08/11/1918	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1230,p.7
BEGIĆ	OMER			Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates)

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Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
BEJTIĆ	ZIJAD	MUHAMED	10/11/1957	Male	WOUNDED	P1449,pp.5,10/P1909,p.5(partialduplicates); P1232,p.1
BEKTAŠEVIĆ	Husein	Nazuf	21/04/1955	Male	KILLED	P1449,pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates)
BJELAK	HASIB	BAJRAM	10/08/1961	Male	WOUNDED	P1232,p.2
BOROVAC	SAMIR			Male	WOUNDED	P1449,pp.4,10/P1909,p.4(partialduplicates); P1233,p.34
BRKAN	SEVDA	HUSO	01/01/1947	Female	KILLED	P1449,pp.3,9,14/P1909,p.3(partialduplicates)/P1977,p.3(partialduplicates); P740,p.33
BRUTUS	VERA	ACO	15/12/1927	Female	KILLED	P1449,pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.29
BUBULJ	RADA	DUŠAN	17/02/1945	Female	WOUNDED	P1449,pp.4,10(LNLAUBUH)/P1909,p.4(partialduplicates)
BUNJO	ŠEMSA	REJZA	30/01/1939	Female	WOUNDED	P1449,pp.4,5,10/P1909,pp.4,5(partialduplicates)
CEPIĆ	HALIDA	MUHAMEDA	15/12/1927	Female	KILLED	P1449,pp.3,9,14/P1909,p.3(partialduplicates)/P1977,p.3(partialduplicates); P740,p.34
COCALIĆ	AJKONA	VELAGA	16/12/1966	Female	WOUNDED	P1449,pp.4,10/P1909,p.4(partialduplicates); P1229,p.1
COCALIĆ	MEJREMA	VELAGE	20/09/1971	Female	KILLED	P1449,pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.17
CRNČALO	HILMIJA	HAMZA	01/01/1945	Female	WOUNDED	P1449,pp.5,11/P1909,p.5(partialduplicates)(LNTR NČALO); P1531,pp.1,37; B.NAKAŠ:P1525,para.94; P1233,p.29
CRNČALO	PAŠA	ATIFA	04/09/1950	Female	KILLED	P1449,pp.3,9,14/P1909,p.3(partialduplicates)/P1977,p.3(partialduplicates); S.CRNČALO:P733,pp.1,15; P740,p.35
DŽEVLAN	ALIJA	DERVE	10/08/1952	Male	KILLED	P1977,p.1; P740,p.42
DIZDAREVIĆ	SUADA			Female	WOUNDED	P1449,pp.5,11/P1909,p.5(partialduplicates)
DLOUHI	DARIO	JOSIP	12/02/1981	Male	KILLED	P1449,pp.4,10(LNBLAUHI)/P1909,p.4(partialduplicates); P740,p.40
DUDIĆ	VIOLETA	DUŠKO	26/11/1980	Female	WOUNDED	P1449,pp.4,10,42/P1909,p.4(partialduplicates); P1233,p.28
DURAKOVIĆ	SALKO	NAZIFA	10/03/1927	Male	KILLED	P1449,pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,pp.6,10
DURAN	ADISA	NAIL	17/03/1976	Female	WOUNDED	P1449,pp.4,10/P1909,p.4(partialduplicates); P1229,p.5

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
FAKIĆ	RAMIZ	AJDIN	20/07/1959	Male	WOUNDED	P1531, pp.1.,33; B.NAKAŠ:P1525, para.94; P1233, p.10
FAZLIĆ	NAJLA	Fadil	20/10/1937	Female	KILLED	P1449, pp.3.,9,13/P1909, p.3(partialduplicates)/P1977, p.2(partialduplicates)
FEROVIĆ	ŠUKRIJA -SUĆO	ŠEMSO	02/10/1938	Male	WOUNDED	P1449, pp.5.,11/P1909, p.5(partialduplicates); P1531, pp.1.,26; B.NAKAŠ:P1525, para.94; P1233, p.2
GALIĆ	RUŽA	STJEPAN	11/11/1924	Female	WOUNDED	P1449, pp.5.,11/P1909, p.5(partialduplicates); P1233, p.23; P1226
GARBO	RIJAD	ZIJADA	17/03/1980	Male	KILLED	P1449, pp.5.,11(LNGRBO)/P1909, p.5(partialduplicates); P1977, p.1(LNGORVO); P740, p.45
GUBEROVIĆ	AMIRA	HAMID	10/03/1946	Female	WOUNDED	P1449, pp.5.,11/P1909, p.5(partialduplicates); P1531, p.1; B.NAKAŠ:P1525, para.94; P1233, p.22; P1234, pp.1.,44
HAŠIMBEGOVIĆ	JUSUF	HALILA	21/09/1934	Male	KILLED	P1449, pp.3.,10/P1909, p.4(partialduplicates); P740, p.43
HABIBOVIĆ	BILAL	MAHID	20/06/1934	Male	WOUNDED	P1449, pp.4.,10/P1909, p.4(partialduplicates); P1230, p.6
HADŽIĆ	AZIZ	MUJO	14/08/1935	Male	WOUNDED	P1449, pp.4.,10/P1909, p.4(partialduplicates)
HADŽIAHMIĆ	NIHADA	SALKO	15/08/1944	Female	WOUNDED	P1449, pp.4.,10/P1909, p.4(partialduplicates)(LNHA DŽIAHIC); P1233, p.36
HAJRIĆ	FERIDA			Female	WOUNDED	P1449, pp.4.,10/P1909, p.4(partialduplicates); P1233, p.33
HAJVAZ	IBRAHIM	IBRO	07/03/1929	Male	KILLED	P1449, pp.3.,9,13/P1909, p.3(partialduplicates)/P1977, p.2(partialduplicates); P740, p.32
HALILOVIĆ	ALMA	ALJJA	12/07/1961	Female	WOUNDED	P1449, pp.4.,10/P1909, p.4(partialduplicates); P1233, p.37
HERDELAS	IZET	SULEJMAN	24/07/1940	Male	WOUNDED	P1449, pp.5.,11/P1909, p.5(partialduplicates); P1233, p.19(LNMERDŽELAŠ)
HERCEGLIJA	MEHO	ABID	09/02/1954	Male	KILLED	P1449, pp.3.,9,13/P1909, p.3(partialduplicates)/P1977, p.2(partialduplicates); P740, p.27
HODŽIĆ	DŽEVAD	RAMO	30/06/1949	Male	WOUNDED	P1449, pp.5.,10/P1909, p.5(partialduplicates); P1231, p.1
HODŽIĆ	JASMINA	AHMO	09/03/1963	Female	KILLED	P1449, pp.3.,9,13/P1909, p.3(partialduplicates)/P1977, p.2(partialduplicates); P740, p.16
HODŽIĆ	MIRZA	ASIM	19/01/1948	Male	WOUNDED	P1449, pp.4.,10/P1909, p.4(partialduplicates); P1230, p.5

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
HOZO	Hajrudin	Mustafa	07/08/1965	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.3
HUSOVIĆ	ETHEM	ULA	28/11/1963	Male	WOUNDED	P1449, pp.4,9/P1909,p.4(partialduplicates); P1231,p.2(FNEthem)
IBRAHIMAGIĆ	ADNAN	FERHAT	06/05/1979	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.22
JAIĆMOVIĆ	PELKA	RADIVOJE	28/04/1964	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)
KADRIĆ	MUMO	MUSTAFA	14/10/1957	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1230,p.4
KALJANAC	HASENA	ZAHID	04/01/1969	Unknown	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)
KANLIĆ	FERID	ASIM	10/11/1944	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1228,p.2
KARKELJA	MUSTAFA	SULJO	04/11/1955	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1230,p.8
KERANOVIĆ	ILIJA	VIDOJA	30/07/1948	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.13
KEROVIĆ	MESUDIJA	RIZO	06/12/1947	Female	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.28
KLARIĆ	ISMET	OSMAN	09/08/1936	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.14
KLARIĆ	MENSURA	DERVIŠ	04/03/1940	Female	WOUNDED	P1449, pp.4,10(LNKARIC, FN Mensuda)/P1909,p.4(partialduplicates); P1449,p.41
KOŠARIĆ	ZAIM	ZAIM	22/06/1937	Male	WOUNDED	P1449, pp.5,11(LNKAKŠIRIĆ)/P1909,p.5(partialduplicates); P1531, pp.1,27; B.NAKAŠ,P1525, para.94; P1233,p.4
KOFRC	SABAHETA	REŠAD	27/05/1958	Female	WOUNDED	P1449, pp.4,10(LNKAFRC)/P1909,p.4(partialduplicates); P1233,p.11
KOMAR	VEHID	HABIB	29/05/1967	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.21
KORJENIĆ	NEDŽAD	SAKIB	02/01/1948	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)
KOSO	RASIM	AHMET	25/08/1947	Male	WOUNDED	P1449, pp.4,10,40/P1909,p.4(partialduplicates); P1228,p.1
KOVAČEVIĆ	MIRSAD	BEĆIR	13/12/1966	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.23
KUKIĆ	Muhammed	Mujo	23/12/1948	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.4

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
KURTOVIĆ	HAŠIM	ČERIMA	01/04/1960	Male	KILLED	P1449, pp.3,9,14/P1909,p.3(partialduplicates)/P1977,p.3(partialduplicates)(FNNašim); P740,p.37
KURTOVIĆ	HALKO	ZEČO	14/02/1957	Male	WOUNDED	P1531, pp.1,28; B.NAKAŠ:P1525,para.94; P1233,p.5
KURTOVIĆ	MAHIT	ŠEMSO	13/04/1935	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,32; B.NAKAŠ:P1525,para.94
KURTOVIĆ	SALKO	ZEČO	27/02/1958	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1531, pp.1,40,41; B.NAKAŠ:P1525,para.94; P1233,p.20
LEKA	ĐULA	AHMET	01/01/1930	Female	WOUNDED	P1449, pp.4,10(LNLEKO)/P1909,p.4(partialduplicates); Đ.LEKA:P117,p.2; Đ.LEKA:P141; P1449, p.44; P1229,p.2
LEVANTA	OSMAN			Male	WOUNDED	P1449, pp.4,9/P1909,p.4(partialduplicates); P1230,p.1
LONČAR	MASIJA	JUNUZA	27/04/1939	Female	KILLED	P740,p.47
MAHMUTOVIĆ	OSMAN	UZEIR	31/05/1944	Male	KILLED	P1449, pp.4,10/P1909,p.4(partialduplicates); P740,p.46
MANGO	NEDŽAD	MURADIF	30/03/1954	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates)
MAREVAC	MEJRA	SULJO	21/03/1953	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)
MAREVAC	SAMIR	ADEM	11/11/1970	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1227
MUJAČIĆ	DAMIR	AVDO	05/04/1984	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,35; B.NAKAŠ:P1525,para.94; P1233,p.14
MURATOVIĆ	Senad	Redžo	29/05/1964	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.2
MUSA	IBRAHIM	FEHIM	06/01/1940	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,42; B.NAKAŠ:P1525,para.94; P1233,p.13
OBRALIĆ	MERDŽANA	TARIK	07/04/1984	Female	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, p.1; B.NAKAŠ:P1525,para.94; P1233,p.1
PAŠIĆ	JANJA	MILJO	18/05/1932	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1229,p.4
PEĆANAC	KOSA	MILOŠ	20/11/1934	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
POTURKOVIĆ	GORAN	SALKE	11/12/1955	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.26
SANDŽAKTAREVIĆ	SUZANA	AHMED	25/10/1965	Female	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,31; B.NAKAŠ:P1525,para.94; P1233,p.8
SIJAMIĆ	NAZIF	SAFET	18/02/1939	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,29; B.NAKAŠ:P1525,para.94; P1233,p.6
SKENDEROVIĆ	SENAD	HARUN	17/05/1963	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,34; B.NAKAŠ:P1525,para.94; P1233,p.12
SMAILHODŽIĆ	HAMID	HUSE	12/08/1949	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.25
SMOLJAN	BLAŽENKA	PERO	03/02/1955	Female	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.19
STOMORNJAK	SELVER	RABIJA	30/04/1956	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,43; B.NAKAŠ:P1525,para.94; P1233,p.31
SVOBODA	ANDREA	EDVARD	22/03/1991	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)
SVOBODA	INDIRA	AKIF	21/09/1961	Female	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1233,p.30
SVRAKA	ISMET	HABIB	17/04/1944	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates); P1992, pp.2-3; I.SVRAKA:T.9662
TAHIROVIĆ	Halko			Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates)
TAHIROVIĆ	Sabit			Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates)
TERZIĆ	ČERIM	IBRAHIM	08/05/1933	Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)
TOPUZOVIĆ	SAMIRA	Jusuf	17/02/1963	Female	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P1977,p.2(partialduplicates); P740,p.1
TRHULJ	NEDŽAD	OMER	20/11/1949	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,38; B.NAKAŠ:P1525,para.94
TRNKA	AMIR	SABIT	10/03/1977	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1233,p.32
TUNOVIĆ	HAMZA	SABIT	13/04/1948	Male	KILLED	P1449, pp.5,11/P1909,p.5(partialduplicates); P740,p.41
TVICO	EMINA	SULEJMAN	26/09/1964	Female	WOUNDED	P1531, pp.1,39; B.NAKAŠ:P1525,para.94; P1233,p.15

Sarajevo Victim List

Last Name	First Name	Father or Mother's Name	Date of Birth	Sex	Wounded or Killed	Proof of Injury
VUKOTIĆ	AJDIN	HAMID	28/01/1938	Male	KILLED	P1449, pp.3,9,14/P1909,p.3(partialduplicates)/P197 7,p.2 (partialduplicates); P740,p.31
VUKOTIĆ	SABAHETA	AJDIN	25/04/1972	Female	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P197 7,p.3 (partialduplicates); P740,p.36
ZAHIRAGIĆ	MURAT			Male	WOUNDED	P1449, pp.4,10/P1909,p.4(partialduplicates)
ZEĆO	MEHO	HALIL	01/06/1922	Male	KILLED	P1449, pp.3,9,13/P1909,p.3(partialduplicates)/P197 7,p.2 (partialduplicates); P740,p.15
ZEC	OMER	MEHMED	07/08/1935	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates); P1531, pp.1,30; B.NAKAŠ; P1525, para.94
ZOLOTA	FEHIM	MEHO	06/04/1941	Male	WOUNDED	P1449, pp.5,11/P1909,p.5(partialduplicates)

CONFIDENTIAL
APPENDIX I

APPENDIX I

List of Abbreviations and Authorities (Glossary)

Abbreviation used	Full citation
Brief	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-T, Prosecution Final Trial Brief, 29 August 2014
DNA Evidence Decision	<i>Prosecutor v. Radovan Karadžić</i> , Case No. IT-95-5/18-T, Decision on the Accused's Motion to Exclude DNA Evidence, 16 April 2013
Indictment	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-PT, Third Amended Indictment, 27 February 2009 (Marked-up version filed on 19 October 2009)
JCE III Decision	Prosecutor v. Radovan Karadžić, Case No.IT-95-5/18-AR72.4, Decision on Prosecution's Motion Appealing Trial Chamber's Decision on JCE III Foreseeability, 25 June 2009
<i>Karadžić and Mladić</i> Rule 61 Decision	<i>Prosecutor v. Radovan Karadžić & Ratko Mladić</i> , Case Nos.IT-95-5-R61, IT-95-18-R61, T.Ch., Review of the Indictments Pursuant to Rule 61 of the Rules of Procedure and Evidence, 11 July 1996
<i>Karadžić Genocide</i> AJ	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-AR98bis.1, App.Ch., Judgement, 11 July 2013
<i>Karadžić</i> Pre-Trial Brief	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-PT, <i>Karadžić</i> Pre-Trial Brief, 29 June 2009
Notice of Special Defence	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-T, Notice of Special Defence as to Count 11: Reprisals, 14 December 2012
Original Srebrenica Indictment	<i>Prosecutor v. Radovan Karadžić and Ratko Mladić</i> , Case No.IT-98-18-I, Indictment, 14 November 1995
POPARIĆ Reports Response	<i>Prosecutor v. Radovan Karadžić</i> , Case No. IT-95-5/18-T, Prosecution's Response to Disclosure of Reports of Expert Witness Mile POPARIĆ and Request to Exclude Portions of POPARIĆ's Reports, 31 January 2013
PTB	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-PT, Prosecution's Submission of Interim Pre-Trial Brief, 8 April 2009 (Prosecution's Final Pre-Trial Brief filed on 18 May 2009)
Response to Notice of Special Defence	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-T, Prosecution's Submission Re: Notice of Special Defence as to Count 11: Reprisals, 5 March 2013
Second 73bis Submission	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-PT, Prosecution Second Submission Pursuant to Rule 73bis(D), 18 September 2009

73bis Submission	<i>Prosecutor v. Radovan Karadžić</i> , Case No.IT-95-5/18-PT, Prosecution Submission Pursuant to Rule 73bis(D), 31 August 2009
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General Sources

Abbreviation used	Full citation
API	Additional Protocol I to the Geneva Conventions of 12 August 1949, and Relating to the Protection of Victims of International Armed Conflicts (Protocol I) of 8 June 1977
GCI	First Geneva Convention for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the Field, 12 August 1949
GCII	Second Geneva Convention for the Amelioration of the Condition of Wounded, Sick and Shipwrecked Members of Armed Forces at Sea, 12 August 1949
GCIII	Third Geneva Convention Relative to the Treatment of Prisoners of War, 12 August 1949
GCIV	Fourth Geneva Convention Relative to the Protection of Civilian Persons in Time of War, 12 August 1949
GCIII Commentary	Commentary, III Geneva Convention Relative to the Treatment of Prisoners of War, The Geneva Conventions of 12 August 1949, Jean S. Pictet, ed. (Geneva: ICRC, 1960)
ICRC Study	J-M. Henckaerts and L. Doswald-Beck, eds., Customary International Humanitarian Law. International Committee of the Red Cross (Cambridge: Cambridge University Press, 2005)

ICTY Decisions and Judgements

Abbreviation used	Full citation
<i>Blagojević</i> AJ	<i>Prosecutor v. Vidoje Blagojević & Dragan Jokić</i> , Case.No.IT-02-60-A, App.Ch., Judgement, 9 May 2007
<i>Blagojević</i> TJ	<i>Prosecutor v. Vidoje Blagojević & Dragan Jokić</i> , Case No.IT-02-60-T, T.Ch., Judgement, 17 January 2005
<i>Blaškić</i> AJ	<i>Prosecutor v. Tihomir Blaškić</i> , Case No.IT-95-14-A, App.Ch., Judgement, 29 July 2004
<i>Blaškić</i> TJ	<i>Prosecutor v. Tihomir Blaškić</i> , Case No.IT-95-14-T, T.Ch., Judgement, 3 March 2000
<i>Boškoski</i> AJ	<i>Prosecutor v. Ljube Boškoski & Johan Tarčulovski</i> , Case No.IT-04-82-A, App.Ch., Judgement, 19 May 2010
<i>Brđanin</i> AJ	<i>Prosecutor v. Radoslav Brđanin</i> , Case No.IT-99-36-A, App.Ch., Judgement, 3 April 2007

<i>Brđanin</i> TJ	<i>Prosecutor v. Radoslav Brđanin</i> , Case No.IT-99-36-T, T.Ch., Judgement, 1 September 2004
<i>Čelebići</i> AJ	<i>Prosecutor v. Zejnil Delalić, Zdravko Mucić, a.k.a. "Pavo", Hazim Delić & Esad Landžo, a.k.a. "Zenga"</i> , Case No.IT-96-21-A, App.Ch., Judgement, 20 February 2001
<i>Čelebići</i> TJ	<i>Prosecutor v. Zejnil Delalić, Zdravko Mucić, a.k.a. "Pavo", Hazim Delić & Esad Landžo, a.k.a. "Zenga"</i> , Case No.IT-96-21-T, T.Ch., Judgement, 16 November 1998
<i>D.Milošević</i> AJ	<i>Prosecutor v. Dragomir Milošević</i> , Case No.IT-98-29/1-A, App.Ch., Judgement, 12 November 2009
<i>D.Milošević</i> Judicial Notice Appeal	<i>Prosecutor v. Dragomir Milošević</i> , Case No.IT-98-29/1-AR73.1, App.Ch., Decision on Interlocutory Appeals Against Trial Chamber's Decision on Prosecution's Motion for Judicial Notice of Adjudicated Facts and Prosecution's Catalogue of Agreed Facts, 26 June 2007
<i>Furundžija</i> TJ	<i>Prosecutor v. Anto Furundžija</i> , Case No.IT-95-17/1-T, T.Ch., Judgement, 10 December 1998
<i>Galić</i> AJ	<i>Prosecutor v. Stanislav Galić</i> , Case No. IT-98-29-A, App.Ch., Judgement, 30 November 2006
<i>Galić</i> TJ	<i>Prosecutor v. Stanislav Galić</i> , Case No. IT-98-29-T, T.Ch., Judgement and Opinion, 5 December 2003
<i>Hadžihasanović</i> AJ	<i>Prosecutor v. Enver Hadžihasanović & Amir Kubura</i> , Case No.IT-01-47-A, App.Ch. Judgement, 22 April 2008
<i>Halilović</i> AJ	<i>Prosecutor v. Sefer Halilović</i> , Case No.IT-01-48-A, App.Ch., Judgement, 16 October 2007
<i>Halilović</i> TJ	<i>Prosecutor v. Sefer Halilović</i> , Case No.IT-01-48-T, T.Ch., Judgement, 16 November 2005
<i>Kordić</i> AJ	<i>Prosecutor v. Dario Kordić & Mario Čerkez</i> , Case No.IT-95-14/2-A, App.Ch., Judgement, 17 December 2004
<i>Krajišnik</i> AJ	<i>Prosecutor v. Momčilo Krajišnik</i> , Case No.IT-00-39-A, App.Ch., Judgement, 17 March 2009
<i>Krajišnik</i> TJ	<i>Prosecutor v. Momčilo Krajišnik</i> , Case No.IT-00-39-T, T.Ch., Judgement, 27 September 2006
<i>Krnojelac</i> TJ	<i>Prosecutor v. Milorad Krnojelac</i> , Case No.IT-97-25-T, T.Ch., Judgement, 15 March 2002
<i>Krstić</i> AJ	<i>Prosecutor v. Radislav Krstić</i> , Case No.IT-98-33-A, App.Ch., Judgement, 19 April 2004
<i>Krstić</i> TJ	<i>Prosecutor v. Radislav Krstić</i> , Case No.IT-98-33-T, T.Ch., Judgement, 2 August 2001
<i>Kunarac</i> AJ	<i>Prosecutor v. Dragoljub Kunarac, Radomir Kovač & Zoran Vuković</i> , Case No.IT-96-23 & IT-96-23/1-A, App.Ch., Judgement, 12 June 2002
<i>Kunarac</i> TJ	<i>Prosecutor v. Dragoljub Kunarac, Radomir Kovač & Zoran Vuković</i> , Case No.IT-96-23-T&IT-96-23/1-T, T.Ch., Judgement, 22 February 2001
<i>Kvočka</i> AJ	<i>Prosecutor v. Miroslav Kvočka, Milojica Kos, Mlado Radić, Zoran Žigić & Dragoljub Prcać</i> , Case No.IT-98-30/1-A, App.Ch., Judgement, 28 February 2005
<i>Martić</i> TJ	<i>Prosecutor v. Milan Martić</i> , Case No.IT-95-11-T, T.Ch., Judgement, 12 June 2007
<i>Milutinović</i> TJ	<i>Prosecutor v. Milan Milutinović, Nikola Šainović, Dragoljub</i>

	<i>Ojdanić, Nebošja Pavković, Vladimir Lazarević & Sreten Lukić</i> , Case No.IT-05-87-T, T.Ch., Judgement, 26 February 2009
<i>Mrkšić</i> AJ	<i>Prosecutor v. Mile Mrkšić and Veselin Šljivančanin</i> , Case No.IT-95-13/1-A, App.Ch., Judgement, 5 May 2009
<i>Naletilić</i> TJ	<i>Prosecutor v. Mladen Naletilić & Vinko Martinović</i> , Case No.IT-98-34-T, T.Ch., Judgement, 31 March 2003
<i>Orić</i> AJ	<i>Prosecutor v. Naser Orić</i> , Case No.IT-03-68-A, App.Ch., Judgement, 3 July 2008
<i>Orić</i> TJ	<i>Prosecutor v. Naser Orić</i> , Case No.IT-03-68-T, T.Ch., Judgement, 30 June 2006
<i>Popović</i> TJ	<i>Prosecutor v. Vujadin Popović, Ljubiša Beara, Drago Nikolić, Ljubomir Borovčanin, Radivoje Miletić, Milan Gvero & Vinko Pandurević</i> , Case No.IT-05-88-T, T.Ch., Judgement, 10 June 2010
<i>Šainović</i> AJ	<i>Prosecutor v. Nikola Šainović, Nebojša Pavković, Vladimir Lazarević & Sreten Lukić</i> , Case No.IT-05-87-A, Judgement, 23 January 2014
<i>Sikirica</i> Rule 98bis Decision	<i>Prosecutor v. Duško Sikirica, Damir Došen & Dragan Kolundžija</i> , Case No.IT-95-8-T, T.Ch., Judgement on Defence Motions to Acquit, 3 September 2001
<i>Simić</i> AJ	<i>Prosecutor v. Blagoje Simić</i> , Case No.IT-95-9-A, App.Ch., Judgement, 28 November 2006
<i>S.Milošević</i> Rule 98bis Decision	<i>Prosecutor v. Slobodan Milošević</i> , Case No.IT-02-54-T, T.Ch., Decision on Motion for Judgement of Acquittal, 16 June 2004
<i>Stakić</i> AJ	<i>Prosecutor v. Milomir Stakić</i> , Case No. IT-97-24-A, App.Ch., Judgement, 22 March 2006
<i>Stakić</i> TJ	<i>Prosecutor v. Milomir Stakić</i> , Case No.IT-97-24-T, T.Ch., Judgement, 31 July 2003
<i>Strugar</i> AJ	<i>Prosecutor v. Pavle Strugar</i> , Case No.IT-01-42-T, T.Ch., Judgement, 31 January 2005
<i>Strugar</i> TJ	<i>Prosecutor v. Pavle Strugar</i> , Case No.IT-01-42-T, T.Ch., Judgement, 31 January 2005
<i>Tadić</i> AJ	<i>Prosecutor v. Duško Tadić</i> , Case No.IT-94-1-A, App.Ch., Judgement, 15 July 1999
<i>Tadić</i> Jurisdiction Decision	<i>Prosecutor v. Duško Tadić a/k/a "Dule"</i> , Case No.IT-94-1-AR72, App.Ch., Decision on the Defence Motion for Interlocutory Appeal on Jurisdiction, 2 October 1995
<i>Tolimir</i> TJ	<i>Prosecutor v. Zdravko Tolimir</i> , Case No.IT-05-88/2-T, T.Ch., Judgement (Public with Confidential Annex C), 12 December 2012
<i>Vasiljević</i> AJ	<i>Prosecutor v. Mitar Vasiljević</i> , Case No.IT-98-32-A, App.Ch., Judgement, 25 February 2004

ICTR Authorities

Abbreviation used	Full citation
<i>Akayesu</i> TJ	<i>Prosecutor v. Jean-Paul Akayesu</i> , Case No. ICTR-96-4-T, T.Ch., Judgement, 2 September 1998

<i>Gacumbitsi</i> AJ	<i>Sylvestre Gacumbitsi v. Prosecutor</i> , Case No.ICTR-2001-64-A, App.Ch., Judgement, 7 July 2006
<i>Kamuhanda</i> AJ	<i>Jean de Dieu Kamuhanda v. Prosecutor</i> , Case No.ICTR-99-54A-A, App.Ch., Judgement, 19 September 2005
<i>Karera</i> TJ	<i>Prosecutor v. François Karera</i> , Case No.ICTR-01-74-T, T.Ch., Judgement and Sentence, 7 December 2007
<i>Kayishema</i> AJ	<i>Prosecutor v. Clément Kayishema & Obed Ruzindana</i> , Case No.ICTR-95-1-A, App.Ch., Judgement (Reasons), 1 June 2001
<i>Muvunyi</i> TJ	<i>Prosecutor v. Tharcisse Muvunyi</i> , Case No.ICTR-00-55A-T, T.Ch., Judgement, 11 February 2010
<i>Ndindabahizi</i> AJ	<i>Emmanuel Ndindabahizi v. Prosecutor</i> , Case No.ICTR-01-71-A, App.Ch., Judgement, 16 January 2007
<i>Semanza</i> TJ	<i>Prosecutor v. Laurent Semanza</i> , Case No.ICTR-97-20-T, T.Ch., Judgement and Sentence, 15 May 2003

SCSL Authorities

Abbreviation used	Full citation
<i>Sesay</i> TJ	<i>Prosecutor v. Sesay et al</i> , SCSL 04-15-T, T.Ch., Judgement, 2 March 2009

Other Sources

Abbreviation used	Full citation
ICC <i>First Decision on Bashir Arrest Warrant</i>	<i>Prosecutor v. Omar Hassan Ahmad Al Bashir</i> , Case No.ICC-02/05-01/09, P.T.Ch., Decision on the Prosecution's Application for a Warrant of Arrest against Omar Hassam Ahmad Al Bashir, 4 March 2009
ICJ Bosnia Judgement	<i>Application of the Convention on the Prevention and Punishment of the Crime of Genocide (Bosnia and Herzegovina v. Serbia and Montenegro)</i> , International Court of Justice, Judgement, I.C.J. Reports 2007, 26 February 2007

Abbreviations

Abbreviation used	Full citation
ABiH	Army of Bosnia and Herzegovina (<i>Armija Bosne i Hercegovine</i>)
AF	Adjudicated Fact

AOR	Area of Responsibility
APC	Armoured Personnel Carrier
ARK	Autonomous Region of Krajina (<i>Automna Regija Krajina</i>)
Art.	Article
Arts.	Articles
Assembly	Assembly of the Serbian People of BiH (<i>later National Assembly of Republika Srpska</i>)
BiH	Socialist Federal Republic of Bosnia and Herzegovina (<i>later, Republic of Bosnia and Herzegovina</i>). Also abbreviated as SRBH, or BH in documents. <i>See</i> RBiH and SRBiH
BiH Court	Court of Bosnia and Herzegovina (<i>Sud Bosne i Hercegovine</i>)
Bosnian Serb Forces	VRS, TO, MUP, and Bosnian Serb paramilitary forces and volunteer units. As used in the Brief, this term refers to some but not necessarily all Bosnian Serb Forces.
BSL	Bosnian Serb Leadership
CG	Contact Group
Combat Readiness Report	Analysis of the Combat Readiness and Activities of the VRS in 1992, dated 1 April 1993 (D325)
CRDB	RDB Center (<i>RDB Centar</i>)
Croatia	Republic of Croatia
CS	Crisis Staff (<i>Krizni štab</i>)
CJB	Public Security Centre (<i>Centar javne bezbjednosti</i>)
Col.	Colonel
CSB	Security Services Centre (<i>Centar službi bezbjednosti</i>)
DB	<i>See</i> RDB and SDB
DCC	Defence Witness Credibility Chart
DK	Drina Corps of the VRS (<i>Drinski korpus</i>)
DMZ	Demilitarized zone
DutchBat	Dutch Battalion III, UNPROFOR
EU	European Union
Exchange Commission	Central Commission for the Exchange of Prisoners-of-War,

	Arrested Persons and the Bodies of Those Killed
Exh.	Exhibit
Exhs.	Exhibits
Federal MUP	Federal (SFRY) Secretariat for Internal Affairs (<i>Savezni sekretarijat za unutrašnje poslove</i>)
fn.	footnote
fns.	footnotes
FREBATT	French Battalion
FRY	Federal Republic of Yugoslavia
GC's	Geneva Conventions I to IV of 12 August 1949
Gen.	General
Gen. Maj.	General Major
HDZ	Croatian Democratic Union (<i>Hrvatska demokratska zajednica</i>)
HK	Herzegovina Corps of the VRS (<i>Hercegovački korpus</i>)
HQ	Headquarters
HVO	Croatian Defence Council (<i>Hrvatsko vijeće obrane</i>)
IBK	East Bosnia Corps of the VRS (<i>Istočno bosanski korpus</i>)
ICMP	International Commission on Missing Persons
ICRC	International Committee of the Red Cross
ICTY	International Criminal Tribunal for the Former Yugoslavia
IFOR	The Implementation Force - NATO-led peacekeeping forces in BiH
IHL	International Humanitarian Law
IKM	Forward Command Post
ITN	Independent Television News
Jahorina Recruits	MUP forces from the Jahorina Training Centre
JCE	Joint Criminal Enterprise
JCO	Joint Commission Observer (UNPROFOR)

JNA	Yugoslav People's Army (<i>Jugoslovenska Narodna Armija</i>)
KDZ	Anti-Terrorism Department of the MUP (<i>Kontradiverziona zaštita</i>)
KOG	Counter-Intelligence Group
Kula School	Nikola Tesla primary school, Kula, Pilica
Lt. Col.	Lieutenant Colonel
MAB	Modified aerial bomb
MBO	Muslim Bosniak Association
MBRL	Multiple barrel rocket launcher
MD	Military District
MOD	Ministry of Defence
MOJ	Ministry of Justice
MP	Military Police
MSF	Médècins Sans Frontières
mtbr	Motorised Brigade
MUP	Ministry of Internal Affairs (<i>Ministarstvo unutrašnjih poslova</i>)
NATO	North Atlantic Treaty Organization
NGO	Non-governmental organisation
NSC	National Security Council (<i>Savjet za nacionalnu bezbjednost</i>)
OBP	Intelligence and Security Sector (<i>Obavještajno bezbjednosni poslovi</i>)
OHR	Office of the High Representative in BiH
OP	Observation Post
para.	paragraph
paras.	paragraphs
p.	page. Page numbers provided in the Brief correspond to eCourt pages
PHR	Physicians for Human Rights
PJP	Regular police unit

PoWs	Prisoners of war
pp.	pages. Page numbers provided in the Brief correspond to eCourt pages
PTT Building	UNPROFOR Sector Sarajevo Headquarters
RCC	Republic Communications Centre
RBiH	Republic of Bosnia and Herzegovina (<i>Republika Bosna i Hercegovina</i>)
RDB	State Security Sector (<i>Resor državne bezbjednosti</i>)—part of the MUP. <i>See</i> DB and SDB
RJB	Public Security Sector (<i>Resor javne bezbjednosti</i>)
RS	<i>Republika Srpska</i> . Includes period of time when it was Serbian Republic of BiH (<i>Srpska Republika BiH</i>) before it was changed to RS on 12 August 1992 (P1358,p.3). <i>See</i> SerRBiH
RSK	Republic of Serbian Krajina (<i>Republika Srpska Krajina</i>)
SAO	Serbian Autonomous Region (<i>Srpska autonomna oblast</i>)
SBP	Special Police Brigade
SDA	Party of Democratic Action (<i>Stranka Demokratske Akcije</i>)
SDB	State Security Service (<i>Služba državne bezbjednosti</i>)—part of the MUP. <i>See</i> DB and RDB
SDC	Supreme Defence Council of the FRY
SDS	Serbian Democratic Party (<i>Srpska Demokratska Stranka</i>)
Serb Forces	MUP, VRS, JNA, VJ, TO, Serbian MUP, Serbian and Bosnian Serb paramilitary forces and volunteer units, and local Bosnian Serbs. As used in the Brief, this term refers to some but not necessarily all Serb Forces.
Serbian MUP	MUP of the Republic of Serbia
SerRBiH	Serbian Republic of BiH (<i>Srpska Republika BiH</i>). Changed to RS on 12 August 1992 (P1358,p.3)
SFRY	Socialist Federal Republic of Yugoslavia
SG	Secretary General of the United Nations
SIC	Scheduled Incident Chart
SIS	Sarajevo Scheduled Incident Summary
SJB	Public Security Station (<i>Stanica javne bezbjednosti</i>)
SNB	<i>See</i> NSC

SNO	Council for National Defence (<i>Savjet za narodnu odbranu</i>)
SOS	Serbian Defence Forces, paramilitary formation (<i>Srpske odbrambene snage</i>)
SRBiH	Socialist Republic of BiH
SRK	Sarajevo-Romanija Corps of the VRS (<i>Sarajevsko romanijski korpus</i>)
SRNA	Srpska Republika News Agency
SRS	Serbian Radical Party (<i>Srpska Radikalna Stranka</i>)
SSNO	Federal Secretariat for the National Defence (<i>Savezni sekretarijat za narodnu odbranu</i>)
State Committee	Republika Srpska State Committee for Co-operation with United Nations and International Humanitarian Organisations
Statute	Statute of the International Criminal Tribunal for the Former Yugoslavia established by UNSC Resolution 827 (1993)
SUP	Secretariat for Internal Affairs (<i>Sekreterijat za unutrašnje poslove</i>)
SVK	The Serbian Army of the RSK (<i>Srpska Vojska Krajine</i>)
T.	Trial Transcript
TEZ	Total Exclusion Zone (areas monitored by the UNPROFOR troops)
TG	Tactical Group (<i>Taktička grupa</i>)
TO	Territorial Defence (<i>Teritorijalna odbrana</i>)
UKRCOY	Ukrainian Company, UNPROFOR
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNPROFOR	United Nations Protection Forces
UNMO	United Nations Military Observers
UNSC	United Nations Security Council
Variant A/B	Instructions for the Organisation and Activity of Organs of the Serbian People in BiH in a State of Emergency, 19 December 1991 (P5-copy no.100 from Sarajevo; P960-copy no.93 from Boksit Office, Holiday Inn, Sarajevo; and P3470-copy no.96 from Trnovo)
ViPVO	Air-Force and Anti-Aircraft Defence (<i>Vazduhoplovstvo i protivvazdušna odbrana</i>)
VJ	Army of the FRY (<i>Vojska Jugoslavije</i>)

VRS	Army of Republika Srpska (<i>Vojaska Republike Srpske</i>)
VRS-GŠ	VRS Main Staff (<i>VRS Glavni Štab</i>)
WCP	Weapons collection point
WWII	World War II
Zvornik DO Notebook	Zvornik Brigade Duty Operations Officer's Notebook
1KK	First Krajina Corps of the VRS (<i>Prvi krajiški korpus</i>)
2KK	Second Krajina Corps of the VRS (<i>Drugi krajiški korpus</i>)
1.Smbr	1 st Sarajevo Mechanised (or Motorised) Brigade
6 th Brigade	1KK 6 th Brigade a.k.a. 6 th Infantry Brigade; 6 th Partisan Brigade; 6 th Sana Brigade; 6 th Sanska Brigade; 6 th Sanska Light Infantry Brigade; 6 th Krajiška Brigade; 6 th Krajina Brigade; 6 th Krajina Infantry Brigade
10 th DOD	10 th Sabotage Detachment
65 th ZMTP	65 th Motorised Protection Regiment

CONFIDENTIAL
APPENDIX J

List of Individuals Mentioned in the Final Trial Brief

Name / Pseudonym	Description
ABDEL RAZEK, General Hussein	Commander, Sector Sarajevo, UNPROFOR Aug 1992-Feb 1993
AČAMOVIĆ, Col Lazar	Assistant Commander, Rear Services (Logistics), Drina Corps
AĆIMOVIĆ, Srećko	Commander, 2nd Battalion, Zvornik Brigade
ADAMOVIĆ, Marko	Ključ Defence Commander; Assistant Commander, 3 rd (Ključ) Battalion, 1 st Infantry Brigade, 1KK
ADŽIĆ, Blagoje	Chief of General Staff of JNA
ADŽIĆ, Ratko	Member of SDS Main Board; President of Ilijaš Municipal Assembly; President of Ilijaš Crisis Staff
AKASHI, Yasushi	Japanese diplomat; personal representative of the Secretary-General of the UN in the former Yugoslavia
ALBRIGHT, Madeleine	US Ambassador to United Nations
ALEKSIĆ, Slavko	Commander of SRS volunteer unit in Grbavica, Sarajevo; Četnik <i>vojvoda</i>
ALEKSIĆ, Zoran	Commander of a paramilitary group in Zvornik
ALLSOP, Derek	Expert in forensic ballistics
ANDAN, Dragomir	Chief of CSB Bijeljina 1992
ANĐELKOVIĆ-LUKIĆ, Mirjana	Weaponry expert, Military Technical Institute, Belgrade
ANDREEV, Viktor	UN Civil Affairs Coordinator, UNPROFOR BiH
ANDRIĆ, Svetozar	1992: Commander of VRS Birač Brigade 13 July 1995: appointed Chief of Staff/Deputy Commander of Drina Corps
ANIČIĆ, Col Nedeljko	Serb TO Commander in Sanski Most; member of Sanski Most Crisis Staff
ARAPOVIĆ, Miško	Member of Military Police, Zvornik Brigade
ARKAN	<i>See</i> Željko RAŽNJATOVIĆ
ARSENOVIĆ, Đojo	President of Government (Prime Minister) of SAO Semberija and Majevisa
AŠĆERIĆ, Dragan	Military Police, Zvornik Brigade
ASHDOWN, Paddy	British politician; High Representative for BiH, 2002-2006
AVLIJAŠ, Slobodan	RS Assistant Minister of Justice
BABIĆ, Rajko	Assistant Commander for Moral Guidance, Zvornik Brigade
BABIĆ, Savo	TO Commander in Bratunac
BAJAGIĆ, Zvonko	Member of TO Vlasenica
BAKER, James	US Secretary of State, 1989-August 1992
BALABAN, Ranko	President of SDS local board for Jošava, Bosanski Novi
BANBURY, Anthony	Civil Affairs officer in UNPROFOR Headquarters, Sarajevo
BANJAC, Boško	President of Sanski Most Commission for Population Migration
BANJAC, Jovan	President of Serbian municipal assembly of Ključ; President of Ključ Crisis Staff
BANJANOVIĆ, Fadil	Resident of Kozluk, Zvornik 1992
BAROŠ, General Miloš	JNA General in Sarajevo barracks, May 1992
BASARA, Col Branko	Commander of 6 th Brigade, 1KK; member of Sanski Most Crisis Staff

Name / Pseudonym	Description
BAŠIĆ, Veljko	Warden of Sušica Camp, Vlasenica
BATINIĆ, Tomislav	President of the Rogatica Serb Municipal Assembly from December 1991; member of Rogatica Crisis Staff
BAXTER, Lt Col James	Military Assistant to Lt Gen Smith, UNPROFOR
BEARA, Col Ljubiša	Chief of Security Administration, VRS Main Staff
BEGOVIĆ, Dr. Zoran	Chief of Medical Centre, Zvornik Brigade
BELL, Dr.	<i>See</i> Milenko VOJINOVIĆ
BELL, Martin	BBC war correspondent
BENDER, Esad	Resident of Ključ municipality, killed at Manjača Camp
BERA, Vojin	Member of Banja Luka CSB
BEROVIĆ, Risto	Member of Vogošća SDS municipal board; member of a Serb unit in Vogošća
BEŠIĆ, Sead	Forensic Technician, Sarajevo CSB, MUP BiH
BILDT, Carl	Former Swedish Prime Minister; European Union Special Envoy to former Yugoslavia June-Dec 1995; High Representative for BiH Dec 1995-June 1997
BIRČAKOVIĆ, Milorad	Member of Military Police, Zvornik Brigade
BIRČAKOVIĆ, Stanoje	Member of Military Police, Zvornik Brigade
BJELANOVIĆ, Rade	Chief of Vlasenica SJB, later Chief of SJB Milići
BJELICA, Milovan	President of Sokolac SDS Municipal Board 1992; member of SAO Romanija Assembly; member of Sokolac Crisis Staff
BLAGOJEVIĆ, Mirko	SRS leader, commander of paramilitary group in Bijeljina
BLAGOJEVIĆ, Vidoje	1992: Commander, Zvornik Brigade and Zvornik Garrison 1995: Commander, Bratunac Brigade
BLISS (now SALE-SAYER), Capt Emma	Aide and interpreter to Gen Smith, UNPROFOR
BOERING, Maj Pieter	Staff Officer, DutchBat, Srebrenica
BOGDANOVIĆ, Goran	Military Police, Zvornik Brigade
BOGDANOVIĆ, Jevto	Member of 1st Battalion, Zvornik Brigade
BOGDANOVIĆ, Radmilo	Minister of Interior, MUP of Serbia
BOGIČEVIĆ, Slavko	Deputy Commander, Engineering Company, Zvornik Brigade
BOJANOVIĆ, Ljubo	Officer, Zvornik Brigade
BOJINOVIĆ, Mirko	Director of ARK Agency for Resettlement
BOROVČANIN, Ljubomir	Deputy Commander, RS MUP Special Police Brigade
BOSILJČIĆ, Ljubo	Assembly deputy from Ilidža; member of SDS Main Board
BOŠKIĆ, Marko	Member of 10 th Sabotage Detachment, VRS Main Staff
BOŠKOVIĆ, General Nedo	Head of JNA/VJ counter-intelligence KOS
BOŠKOVIĆ, Rade	ULT-220 (engineering machinery) driver
BOWEN, Jeremy	BBC war correspondent in Sarajevo, 1992-1995
BOŽIĆ, Jovo	President of Serb municipality of Rajlovac; President of Rajlovac municipal Crisis Staff
BRĐANIN, Radislav	Assembly deputy from Banja Luka; President of ARK Crisis Staff
BRENNKAG, Per Anton	Norwegian army officer; UNMO in Pale and Sarajevo March-Sept 1995
BRIQUEMONT, Gen	Belgian General; Commander of UNPROFOR in BiH July

Name / Pseudonym	Description
Francis	1993-January 1994
BUDIMIR, Slavko	Member of Prijedor Crisis Staff
BUHA, Aleksa	Member of SDS Main Board; Assembly deputy from Sarajevo; RS Minister of Foreign Affairs
BULATOVIĆ, Momir	President of Montenegro 1990-1998; member of FRY Supreme Defence Council
ČANČAR, Petko	Assembly deputy from Foča; President of Foča Municipal Assembly; Member of Foča Crisis Staff
CAPTAIN DRAGAN	<i>See Dragan VASILJKOVIĆ</i>
ČARKIĆ, Capt Zoran	Chief of Intelligence and Security, Rogatica Brigade
“ČARLI”/“Charlie”	Commander of a paramilitary unit active in Pale
CARRINGTON, Peter Lord	British diplomat; Chairman of international peace conference on the former Yugoslavia
ČAVOŠKI, Kosta	Professor of Law, University of Belgrade; President of Committee for Truth about Radovan Karadžić
ČEKIĆ, Gojko	Commander of Batković Camp
ČELANOVIĆ, Zlatan	Desk Officer for Moral, Legal and Religious Affairs, Bratunac Brigade
ČELIĆ, Predrag	2nd Šekovići Detachment, Special Police Brigade, RS MUP
CEROVIĆ, Col Slobodan	Assistant Commander for Moral, Legal and Religious Affairs, Drina Corps
ČESIĆ, Ranko	Member of Intervention Platoon, SJB Brčko
ČIZMOVIĆ, Jovan	Co-ordinator for SAO governments; member of RS Council of Ministers
CEKLIĆ, Momčilo	Secretary of the Municipal Assembly of Ilidža
CORWIN, Philip	UN Political Affairs Officer, UNPROFOR
ĆOSOVIĆ, Branimir	Commander of a unit within VRS Tactical Group Foča
CRNČALO, Sulejman	Resident of Pale, 1992
ČUKOV, Captain Ostoja	Commander of 4 th Battalion, 6 th Brigade, 1KK, Sanski Most
CUTILEIRO, José	Portuguese diplomat; EC mediator in BiH
ČUTURIĆ, Rade	Deputy Commander, 2nd Šekovići Detachment, PJP, RSMUP
CVETKOVIĆ, Col Radislav	Commander, 4 th Mixed Artillery Regiment, later SRK Chief of Artillery
CVIJETIĆ, Zoran	Chief of Sokolac SJB 1992; SAO Romanija Minister of Interior from 30 March 1992
ČVORO, Zdravko	President of Pale Crisis Staff and Pale Municipality Executive Committee
DAMJANOVIĆ, Mile	Commander of Bosanski Novi TO Staff; member of Bosanski Novi Crisis Staff
DAVIDOVIĆ, Milorad	Chief of Bijeljina SJB until May or June 1991, then in Federal SUP Belgrade; Head of special federal police unit assisting RS MUP in summer 1992
DAVIDOVIĆ, Radomir	Director, Milići Hospital
DAVIDOVIĆ, Srbislav	President, Executive Board, Bratunac Municipality; Commander, Bratunac Civil Protection
DE LA PRESLE, Gen Bertrand	French General; Commander, UNPROFOR, March 1994-February 1995
DE MELLO, Sergio Vieira	Brazilian diplomat; Special Representative of UN Secretary-General for Yugoslavia; later Head of Civil Affairs of

Name / Pseudonym	Description
	UNPROFOR
DEMURENKO, Andrej	Chief of Staff, Sarajevo Sector, UNPROFOR, Jan-Dec 1995
DERIĆ, Branko	Prime Minister of RS 1992
DERONJIĆ, Miroslav	1992: President of Bratunac SDS municipal board; President of Bratunac Crisis Staff 1995: Civilian Commissioner for Srebrenica
DERONJIĆ, Nenad	Member of 2 nd Zvornik PJP Company, RS MUP
DIBB, Capt Tomas	Liaison Officer, UNPROFOR
DIVJAK, General Jovan	Deputy Commander of the Supreme Staff, ABiH
DJURDJEVIĆ, Robert	Serbian-American businessman and publicist
DMIČIĆ, Mile	Chef de cabinet for KARADŽIĆ, 1995
DOBRIJEVIĆ, Mile	Police officer in Sanski Most SJB
DODIK, Milorad	Independent deputy in RS Assembly; postwar President of RS
ĐOGO, Gojko	Serbian writer, President of Association of BiH Serbs in Serbia
ĐOGO, Risto	Bosnian Serb journalist and television presenter
ĐOKIĆ, Neško	Member of Zvornik Brigade
ĐOKIĆ, Slobodan	Member of Zvornik Brigade
DONIA, Robert	American historian
DORST, Raymond	Member of DutchBat, Srebrenica
DOYLE, Colm	Irish military officer; Head of ECMM in Sarajevo (Nov 1991-March 1992); personal representative of Lord Carrington (April-August 1992)
DRAGIČEVIĆ, Krsto	Member, 3 rd Platoon, 2 nd Šekovići Detachment, PJP, RSMUP
DRINIĆ, Predrag	Military Appellate Prosecutor, VRS, Zvornik 1995
DRLJAČA, Simo	Chief of Prijedor SJB; Prijedor representative to ARK Assembly
DUDNJIK, Col Sejmon	Commander, UKRCOY, Žepa
ĐUKANOVIĆ, Rodoljub	President of Bratunac municipal Executive Board; member of Bratunac Crisis Staff
ĐUKIĆ, Lt Col Gen Đorđe	Assistant Commander, Rear Services, VRS Main Staff
DUKIĆ, Rajko	Member of SDS Main Board; President of SDS Executive Board; Head of <i>Boksit</i> Enterprise in Milići
DUNJIĆ, Dušan	Expert in forensic medicine
ĐURĐEVAC, Gen Vojislav	Commander, JNA 4 th Corps
ĐURĐIĆ, Col Miloš	Chief of Section for Communication with Foreign Military Representatives, VRS Main Staff
ĐURIĆ, Elvis	Commander of Special Police Platoon, Vlasenica
ĐURIĆ, Mane	Chief of SJB Vlasenica from August 1992 Deputy Commander, Zvornik CJB 1995
ĐURIĆ, Mendeljev	Commander, 1st Company, RS MUP Special Police Brigade Training Centre, Jahorina
ĐURKOVIĆ, Vojislav a.k.a. "VOJKAN" a.k.a. "PUŠKAR"	Paramilitary member active in expulsions in Bijeljina between 1992 and 1995; SDS Member
ĐUROVIĆ, Žarko	President of Novo Sarajevo SDS municipal board; President of Novo Sarajevo municipal Executive Board; first President

Name / Pseudonym	Description
	of Novo Sarajevo Crisis Staff; Minister without portfolio in Government of SAO Romanija
DŽAFIĆ, Atif	Commander of Ključ Police Station (uniformed police) within the Ključ SJB
DŽAMBASOVIĆ, Asim	Chief of Staff, 216 th Mountain Brigade JNA until early April 1992; Chief of Staff, ABiH 1 st Corps Nov 1992-Aug 1993
DŽIDA, Milorad	Company commander, 1 st Romanija infantry brigade, SRK till August 1993; Head of Intelligence and Security, 7 th Battalion, 1 st Rpbr, SRK Aug 93-Oct 94; later Commander, 4 th Battalion, 1 st Rpbr, SRK
EGBERS, Lt Vincentius	Commander, 3rd Platoon, DutchBat, Srebrenica
EGRLIĆ, Asim	President of Ključ SDA; President of Ključ Municipal Assembly Executive Committee
ELEZ, Pero	Commander of a unit within VRS Tactical Group Foča
ERCEG, Nikola	Assembly deputy from Banja Luka; President of ARK Executive Committee; member of ARK Crisis Staff
ERDEMOVIĆ, Dražen	Member of 10th Sabotage Detachment, VRS Main Staff
FILIPOVIĆ, Branislav a.k.a. "ŠUMAR"	SRS volunteer
FILIPOVIĆ, Omer	President of Ključ Muslim Bosniak Association (MBO), Vice-President of Ključ Municipal Assembly
FORTIN, Maj Louis	Military Assistant to Gen GOBILLARD
FRANKEN, Maj Robert	Deputy Commander, DutchBat, Srebrenica
FRASER, Brig Gen David	Canadian army officer; Military Assistant to Sarajevo Sector Commander, UNPROFOR Apr 1994-May 1995
FROST, David	British journalist and television host
FURTULA, Maj Radomir	Commander, Višegrad Brigade
GAGOVIĆ, Dragan	Chief of Foča SJB; Member of Foča Crisis Staff
GAGOVIĆ, Col Milisav	Acting Commander of JNA 4th Corps, later SRK 1992
GAJIĆ, Todo	Investigator, Ključ SJB
GALIĆ, Maj Mihajlo	Assistant Chief of Staff, Reinforcement and Personnel Affairs, Zvornik Brigade
GALIĆ, Gen Stanislav	Commander, 30 th Infantry Division in Ključ; Commander, Sarajevo-Romanija Corps Sept 1992-Aug 1994
GARIĆ, Momo	Commander, Serbian TO, Novo Sarajevo, later Novo Sarajevo Brigade
GAVRIĆ, Dr. Jugoslav	Director, Zvornik Hospital, Zvornik Brigade
GAVRIĆ, Mičo	Artillery Chief, Bratunac Brigade
GAVRILOVIĆ, Branislav a.k.a. "BRNE"	Četnik <i>vojvoda</i> , commander of SRS unit in Ilidža
GENGO, Slavko	Officer for Technical Supplies, 1 st Romanija infantry brigade Sept 1992-Jan 1994; Commander, 7 th Battalion, 1 st Rpbr Jan 1994-Feb 95; Logistics officer, SRK Command Feb 1995-end
GIČEVIĆ, Alen	Resident of Sarajevo
GLAVAŠ, Tihomir	Commander of Hadžići Serb SJB
GLOGOVAC, Siniša	SDB Operative, Bratunac area
[REDACTED]	[REDACTED]
GOJKOVIĆ, Brano	Member 10th Sabotage Detachment, VRS Main Staff

Name / Pseudonym	Description
GOJKOVIĆ, Danko	Communications specialist, Rogatica Brigade
GOLIĆ, Izet	Member of Rogatica Battalion, 216 th Mountain Brigade, SRK
GOLIĆ, Maj Pavle	Assistant Chief for Intelligence, Drina Corps
GOTOVAC, Đorđe	Driver, Zvornik Brigade
GRAHOVAC, Anđelko	Assembly deputy from Banja Luka; President of ARK Government (Prime Minister); member of RS Council of Ministers
GRAY, Col Richard	New Zealand military officer; Chief Operations Officer and Senior UNMO for Sector Sarajevo, June-Sept 1992
GRKOVIĆ, Ljubo	SDS Chef de Cabinet to KARADŽIĆ
GROEN, Maj	Commander, Bravo Company, DutchBat, Srebrenica
GROENEWEGEN, Paul	Member of DutchBat, Srebrenica
GRUJIĆ, Brane	President of Zvornik Crisis Staff
GUZINA, Svetozar	Commander, 5 th battalion, Ilidža Brigade, SRK, VRS
GVERO, Milan	Assistant Commander Moral, Legal Affairs, VRS Main Staff
HALILOVIĆ, Gen Sefer	Commander, ABiH
HAMILL, Lt Col John	Irish army officer; UNMO May 1993-July 1994
HARLAND, David	Civil Affairs Officer, UNPROFOR, Sarajevo
HATCHETT, Ronald	Former US Air Force officer; member of Lord Byron Foundation for Balkan Studies
HIGGS, Richard	British army Subject Matter Expert in mortars
HOGAN, Barry	Investigator, OTP, UN ICTY
IKONIĆ, Nedo	Commander, 2nd Company, RS MUP Special Police Brigade Training Centre, Jahorina
ILIĆ, Milisav	Policeman, RS MUP
INĐIĆ, Col Milenko	Liaison Officer, Sarajevo-Romanija Corps
IVANOVIĆ, Dragoje	Military Police, Zvornik Brigade
IVANOVIĆ, Jovan	President of Zvornik municipal Executive Board; member of Zvornik Crisis Staff
IVANOVIĆ, Stevan	Member of Zvornik War Staff, May 1992
IVANOVIĆ, Veljko	Driver, 2nd Battalion, Zvornik Brigade
IVANOVIĆ, Živojin a.k.a. "Žika CRNOGORAC" ("The Montenegrin")	Commander of Special Purposes Unit, MUP, Republic of Serbia
IZETBEGOVIĆ, Alija	President of Presidency of BiH; President of SDA
JAKOVLJEVIĆ, Col Pero	Head, Counter Intelligence Group (KOG), Security Administration, VRS Main Staff
JANC, Dušan	Former Investigator, OTP, UN ICTY
JANJIĆ, Mile	Member of Military Police, Bratunac Brigade
JANKOVIĆ, Lt Col Radoslav	Officer of JNA 4 th Corps command, member of Liaison Team with EUMM and UNPROFOR
JANKOVIĆ, Dušan	Deputy Chief, Prijedor SJB
JANKOVIĆ, Gojko	Commander of a unit within VRS Tactical Group Foča
JANKOVIĆ, Sgt Mirko	Commander, Military Police Platoon, Bratunac Brigade
JANKOVIĆ, Col Radoslav	Officer, Intelligence Administration, VRS Main Staff
JANVIER, Lt Gen	French General; Commander, UNPROFOR from March 1995

Name / Pseudonym	Description
Bernard	
JASIKOVAC, Lt Miomir	Commander, Military Police Company, Zvornik Brigade
JAZIĆ, Lt Col Jovo	Deputy Commander and Chief of Staff, 65th ZMTP, VRS Main Staff
JEKIĆ, Radivoje	Member of 2nd Battalion, Zvornik Brigade
[REDACTED]	[REDACTED]
JELIŠIĆ, Goran	Member of Serb forces, Brčko
JEREMIĆ, Nebojša	Member of Military Police, Zvornik Brigade
JEŠURIĆ, Predrag	Chief of Bijeljina SJB from May or June 1991; Head of Immigration Administration at RS MUP from approximately August 1992
JEVĐEVIĆ, Maj Milenko	Chief, Communications Battalion, Drina Corps
JEVIĆ, Duško a.k.a. "STALIN"	Assistant Commander, Operations and Training, Special Police Brigade, RS MUP
JOKIĆ, Maj Dragan	Chief of Staff, Engineering Company, Zvornik Brigade
[REDACTED]	[REDACTED]
JOSEPH, Edward	Civil Affairs Officer, UNPROFOR
JOSIĆ, Vlado	Driver for Ostoja STANIŠIĆ, Zvornik Brigade
JOUDRY, Steven	Canadian artillery officer; Staff Officer, UNPROFOR
JOVANOVIĆ, Milenko	Head of Novo Sarajevo SJB
JOVANOVIĆ, Slavko	Member of Vogošća Crisis Staff
JOVANOVIĆ, Vladislav	Foreign Minister of Serbia, later of FRY
JOVANOVIĆ, Capt Zoran	Deputy Commander, 6 th Battalion, Zvornik Brigade
JOVIĆ, Čedo	Member of Military Police, Zvornik Brigade
JOVIĆ, Dragan	Driver for Srećko AĆIMOVIĆ, Zvornik Brigade
JOVIĆ, Mirko	President of SNO (Serbian National Renewal) party in Serbia; leader of SNO's paramilitaries "White Eagles"
JOVIČIĆ, Milanko	Chief of Communications, Zvornik Brigade
KADIJEVIĆ, Gen Veljko	Minister of Defence of SFRY, until January 1992
KAJTEZ, Daniluško	Member of SOS, later 6 th Brigade, Sanski Most
KALABIĆ, Rajko	Assembly Deputy for Ključ; member of Ključ Crisis Staff
KALINIĆ, Dragan	Independent Assembly Deputy from Sarajevo; RS Minister of Health
KARABEG, Mirzet	Former President of Sanski Most municipal Executive Board
KARANOVIĆ, Lt Col Jovica	Chief of Section, Operations and Analytical Affairs, Intelligence Administration, VRS Main Staff
KARIĆ, Hajrudin	Resident of Pale, 1992
KARAŠIK, Milenko	Commander, Special Police Detachment, later Brigade, RS MUP, 1992-1994; Deputy Minister and Chief of Public Security Department, RS MUP from November 1994
KARREMANS, Lt Col Thomas	Commander, DutchBat, Srebrenica
KATANIĆ, Milenko	Member of Bratunac SDS municipal board; Construction engineer in Bratunac and later Srebrenica municipal administration
KAURINOVIĆ, Petar	Member of Brčko SJB
KECMANOVIĆ, Nenad	President of Alliance of Reform Forces of Yugoslavia for BiH; member of BiH Presidency, June-July 1992

Name / Pseudonym	Description
KEKIĆ, Dragan	President, Co-ordinating Board for Humanitarian Aid, RS
KESEROVIĆ, Dragomir	1992: brigade commander in 1 st Krajina Corps, Commander of Military Police Battalion of East Bosnia Corps; 1995: Chief of Police Section, Security Administration, VRS Main Staff
KEZUNOVIĆ, Dragan	Chief of Communications Department, RS MUP
KEZUNOVIĆ, Radomir	President of Ilidža municipal Executive Board
KIJAC, Dragan	Head of State Security Service, RS MUP; later, Minister of Interior, RS MUP
KINGORI, Maj Joseph	Kenyan Air Force Officer; UNMO, Srebrenica
KIRUDJA, Charles	UN Chief Civil Affairs Officer, later Civil Affairs Coordinator in UNPA Sector North from April 1992 to March 1994
KLIČKOVIĆ, Gojko	Member of SDS Main Board; President of Bosanska Krupa Crisis Staff
KLJAJIĆ, Čedomir	Under-Secretary in RS MUP
KNEŽEVIĆ, Lt Col Čedo	Head, 410 th Intelligence Centre, Intelligence Administration, VRS Main Staff
KNEŽEVIĆ, Duško	VRS soldier, convicted of crimes at Omarska and Keraterm
KNEŽEVIĆ, Srđan	Commander of a Serb armed unit in Pale
KNUSTAD, Thomas	Norwegian artillery officer; UNMO in Sarajevo Jun-Dec 1995
KOJIĆ, Ratomir/Radomir	Commander of a Serb armed unit in Pale
KOJIĆ, Savo	President, Bijeljina SDS Municipal Board
KOLJEVIĆ, Nikola	1992: Member of RS Presidency 1995: RS Deputy President, Head of Committee for Co-operation with the UN and International Organisations
KOMAD, Trifko	Secretary of SDS Executive Board
KONDIĆ, Veljko	President of Ključ SDS; Vice-President of Ključ Crisis Staff
KONDIĆ Vinko	Chief of Ključ SJB
KONINGS, Lt Col Harry	Dutch army officer; UNMO in Sarajevo, April-October 1995
KOPRIVICA, Rajko	President of Executive Committee of Serb municipality of Vogošća; later President of Serb municipality of Vogošća
KOROMAN, Malko	Chief of Pale SJB; Member of Pale Crisis Staff
KOS, Lt Franc	Commander, Bijeljina Platoon, 10th Sabotage Detachment, VRS Main Staff
KOSORIĆ, Lt Col Svetozar	Chief of Intelligence, Drina Corps
KOSTER, Lt Eelco	Logistics Officer, DutchBat, Srebrenica
KOSTIĆ, Rade	Member of State Security Service, MUP of Serbia
KOVAČ, Marko	Commander, Tactical Group Foča (TG Foča), VRS
KOVAČ, Radomir	Member of unit within Tactical Group Foča (TG Foča), VRS
KOVAČ, Tomislav a.k.a. "Tomo"	1992: Ilidža SJB Commander 1995: RS Deputy Minister, later Minister of Interior
KOVAČEVIĆ, Blagoje	Commander, 3 rd Battalion, 1 st Sarajevo mbr, SRK
KOVAČEVIĆ, Dušan	Logistics Officer, Command of 2 nd Military District Sarajevo 1992; Minister of Defence, Government of RS 1993-1994
KOVAČEVIĆ, Mićo	Representative of Prijedor in ARK Assembly
KOVAČEVIĆ, Sveto	Member of SDS Main Board; President of Čelinac Municipal Assembly; President of Čelinac Crisis Staff
KOVAČEVIĆ, Veljko	Driver, Zvornik Brigade
KRAJIŠNIK, Mirko	Brother of Momčilo KRAJIŠNIK; resident of Rajlovac

Name / Pseudonym	Description
KRAJIŠNIK, Momčilo	Close associate of Karadžić from founding of SDS; member of SDS Main Board; President of BiH National Assembly, later of RS National Assembly; member of RS Expanded Presidency
KRALJ, Slavko	Deputy Chief of Section, Communication with Foreign Military Representatives, VRS Main Staff
KRALJEVIĆ, Miroslav	Commander of Special Police Platoon, Vlasenica
KREMENOVIĆ, Lt Radoslav	Member of 10th Sabotage Detachment of VRS Main Staff
KRNOJELAC, Milorad	Warden, KP Dom Foča
KRSMANOVIĆ, Maj Aleksa	Deputy Chief, Section for Mobilisation and Personnel, 4 th Corps command, JNA
KRSMANOVIĆ, Đorđe	Member of Bijeljina War Presidency; Chief of Bijeljina municipal Housing Department
KRSMANOVIĆ, Željko a.k.a. "PUFTA"	Member of ŠEŠELJ's paramilitary group in Zvornik
KRSTIĆ, Radislav a.k.a. "KRLE"	1992-1994: Commander 2 nd Romanija Motorised Brigade 1995: appointed Commander, Drina Corps, on 13 July 1995
KUČANIN, Mirsad	Criminal Inspector, CSB Sarajevo
[REDACTED]	[REDACTED]
KUKANJAC, Milutin	Commander, 2 nd Military District Sarajevo, until May 1992
KULIĆ, Dragan	Commander, Ugljevik SJB, RS MUP
KULOVAC, Dr. Benjamin	Member of Žepa War Presidency
KUNARAC, Dragoljub a.k.a. "ZAGA"	Commander, "Independent Zaga Detachment," TG Foča, VRS
KUPREŠANIN, Vojislav	Assembly Deputy from Banja Luka; member of SDS Main Board; President of ARK Assembly
KURUZOVIĆ, Slobodan	Commander, Prijedor Serb TO; Commander of Trnopolje Camp; Member of Prijedor Crisis Staff
KUŠIĆ, Rajko	Commander, Rogatica Brigade; SDS Main Board member; Member of Rogatica Serb Municipal Crisis Staff
KUTILJA, Dragomir	Chief of Bosanski Novi SJB; member of Bosanski Novi Crisis Staff
LAKIĆ, Nedeljko	Secretary of RS Government
LAKIĆ, Capt Radivoje	Platoon Commander, 1st Battalion, Zvornik Brigade
LAZAREVIĆ, Damjan	Member of Engineering Company, Zvornik Brigade
LAZAREVIĆ, Mitar	Member of Battalion, Zvornik Brigade
LAZIĆ, Col Milenko	Member of Operations and Training Section, Drina Corps
LEGIJA	<i>See</i> Milorad ULEMEK
LIZDEK, Gen Vlado	Commander, 1 st Romanija Infantry Brigade, SRK
LJUBINAC, Radisav a.k.a. "PJANO"	Member of Rogatica Brigade, VRS
LUČIĆ, Aleksandar	Deputy Commander, Military Police Battalion, 65th ZMTP, VRS Main Staff
LUČIĆ, Svetislav	President of Pale SDS Municipal Board; member of Pale Crisis Staff
LUGONJA, Petar	Member of SDS in Ilidža
LUKIĆ, Vladimir	RS Prime Minister 1993-1994

Name / Pseudonym	Description
MAJKIĆ, Dragan	Prewar Chief of SJB Sanski Most
MAJKIĆ, Mladen	Assistant TO Staff Commander in Sanski Most
MAKSIMOVIĆ, Miloš	Member of SOS, Sanski Most
MAKSIMOVIĆ, Siniša	Member of Intervention Platoon, 4 th Battalion, Igman Brigade
MAKSIMOVIĆ, Vojislav	Assembly Deputy from Sarajevo; President, SDS Deputies' Club, BiH Assembly; Member of Foča Crisis Staff; Republican Commissioner in Foča from June 1992
MALETIĆ, Dragan	Commander, 1 st Company, 3 rd Battalion SRK1 st Sarajevo mbr in Grbavica
MALINIĆ, Major Zoran a.k.a. "ZOKA"	Commander, Military Police Battalion, 65th ZMTP, VRS Main Staff
MALOVIĆ, Duško	Head of a Special Police Unit of the RS MUP (active in Bijeljina in 1992)
MAMLIĆ, Lt Col Slobodan	Chief, Electronic Reconnaissance, Intelligence Administration, VRS Main Staff
MANDARIĆ, Lt General Nikola	1992: Deputy Commander, Chief of Staff, JNA 1 st Army 1993: Deputy Chief of GŠ, Logistics Section, Technical Department, VJ
MANDIĆ, Momčilo	Assistant Minister of the Interior (MUP) until May 1992; RS Minister of Justice May 1992-January 1993
MANDILOVIĆ, Dr. Milan	Chief of ENT Department, State Hospital, Sarajevo
MANDŽIĆ, Nesib	Srebrenica Muslim Civilian Representative, Hotel Fontana Meetings
MANOJLOVIĆ, Lt Col Tadija	Chief of Artillery, Sarajevo-Romanija Corps
MARČETIĆ, Lt Col Dragan	Deputy Commander, Sarajevo-Romanija Corps
MARIĆ, Lt Col Milorad	Chief, Counter Intelligence, Security Administration, VRS Main Staff
MARIĆ, Gen Jovo	Assistant Commander, Air Force and Air Defence, VRS Main Staff
MARIĆ, Milan	Officer, Zvornik Brigade
MARKOVIĆ, Dragan	Commander, Ilidža TO Staff
MARKOVIĆ, Slobodan	Member of RS Government Commission for Exchange of Prisoners of War
MARTIĆ, Milan	Minister of Defence and Minister of Interior, SAO Krajina, later RSK; President of RSK from 1994
MAŠOVIĆ, Amor	President, BiH State Commission for Tracing Missing Persons
MATIĆ, Vojo	2nd Company, 4th Battalion, Zvornik Brigade
MAUZER	See Ljubiša SAVIĆ
MAZOWIECKI, Tadeusz	Special Rapporteur, UN Commission of Human Rights
MEJAKIĆ, Željko	Chief of Security, Omarska camp
MIČIĆ, Dragan	Assembly deputy from Bijeljina
MIČIĆ, Mile	Driver for General TOLIMIR
MIČIĆ, Stjepan	Chief of Criminal Investigations Service, RS MUP
MIHAJLOVIĆ, Draženko	Resident of Seljani village, Rogatica, killed 20 May 1992
MIHAJLOVIĆ, Svetozar	Chairman of Bijeljina municipal Executive Committee

Name / Pseudonym	Description
MIHIĆ, Dragiša	Deputy Head, SDB, RS MUP
MIJATOVIĆ, Jovo	Assembly deputy from Zvornik
MIJATOVIĆ, Nikola	Resident of Alipašino Polje, Sarajevo
MIJIĆ, Ranko	Member of Banja Luka CSB
MIJOVIĆ, Vasilije	Commander of paramilitary unit of MUP of Serbia active in Croatia and Bosnia
MILADINOVIĆ, Milovan	Engineering Company, Zvornik Brigade
MILANKOVIĆ, Goran	Commander, “Vukovi” (Wolves) paramilitary unit
MILANOVIĆ, Milovan	Assembly Deputy from Banja Luka; member of ARK Crisis Staff
MILETIĆ, Col Radivoje	Chief of Operations and Training and Assistant Chief of Staff, VRS Main Staff
MILIČIĆ, Josip	President of Serbian Assembly of Foča; Member of Foča Crisis Staff
MILINČIĆ, Miloš	Member of SDS Main Board; President of Srbac Municipal Assembly
MILINIĆ, Gordan	Member of SDS Main Board; Presidential Advisor 1994-1995
MILINKOVIĆ, Lt Col Pavle	Brčko Garrison Commander, Serbian Armed Forces of RBiH
MILOJEVIĆ, Aleksa	Member of SDS Main Board and SDS Executive Board; later RS Minister for Reconstruction and Development
MILOŠEVIĆ, Dragomir	Commander, 216 th Mountain Brigade, JNA; Commander of Sarajevo Romanija Corps from Aug 1994
MILOŠEVIĆ, Marko	Deputy Commander, 6th Battalion, Zvornik Brigade
MILOŠEVIĆ, Milutin	Chief of Bratunac SJB
MILOŠEVIĆ, Slobodan	President of Serbia, later of Federal Republic of Yugoslavia
MILOŠEVIĆ, Capt 1st Class Sreten	Assistant Commander, Logistics, Zvornik Brigade
MILOŠEVIĆ, Svetozar	President of Novi Grad municipal Executive Board
MILOVANOVIĆ, Lt Col Gen Manojlo	Deputy Commander and Chief of Staff, VRS Main Staff
MILUTINOVIĆ, Lt Col Milovan	Chief, VRS Main Staff Press Center
MISKIN, Jovo	Republic War Commissioner for Bijeljina, Brčko and Derventa
[REDACTED]	[REDACTED]
MIRKOVIĆ, Mićo	Excavator Operator, Engineering Company, Zvornik Brigade
MIŠČEVIĆ, Ilija	Resident of Hrasnica, Sarajevo
MIŠKOVIĆ, Simo	President of Prijedor SDS Municipal Board; Prijedor representative to ARK Assembly
MITROVIĆ, Lt Col Ljubomir	Security Officer, East Bosnia Corps; President, Commission for Exchange of Prisoners, Bijeljina
MITROVIĆ, Col Mikajlo	Chief of Intelligence and Security Affairs, 2 nd Krajina Corps
MITROVIĆ, Miloš	Excavator Operator, Engineering Company, Zvornik Brigade
MITROVIĆ, Svetozar a.k.a. “NIŠKI”	Commander, “Kobras” paramilitary group, Zvornik
MLADENOVIĆ, Radojica	Chairman, Serbian municipal Assembly of Foča; Member of Foča Crisis Staff

Name / Pseudonym	Description
MLADIĆ, Ratko	Commander of VRS Main Staff
MOLE, Lt Col Richard	British army officer; Senior Military Observer, UNMO, in Sarajevo Sept-Dec 1992
MOMČILOVIĆ, Sgt. Božo	Member of 1st Battalion, Bratunac Brigade
MORILLON, Philippe	French General, Commander of UNPROFOR 1992-1993
MOROZ, Sergey	Mission Commander, Engineering Section, Sector Sarajevo UNPROFOR, Oct 1993-Oct 1994
MOTIKA, Milorad	Director, PRETIS Industry, Vogošća
MULAOSMANOVIĆ-ČEHAJIĆ, Alma	Resident of Sarajevo
NAKAŠ, Dr. Bakir	Administrator, State Hospital, Sarajevo
NASTIĆ, Lt Col Milomir	Commander, 1 st Milići light infantry Brigade
NEŠIĆ, Kosta	President of SDS local board for Svrake, Vogošća; commander of a Serb unit in Vogošća
NEŠKOVIĆ, Radomir	Member of SDS Main Board and SDS Executive Board; second president of Novo Sarajevo Crisis Staff
NICOLAI, Brig Gen Cornelis	Dutch General; Chief of Staff to Lt Gen Smith, UNPROFOR
NIKOLIĆ, Đoko	Member of 2nd Battalion, Zvornik Brigade
NIKOLIĆ, Lt Drago	Assistant Commander for Security, Zvornik Brigade
NIKOLIĆ, Jovan	Member of Bratunac municipal Executive Board; member of Bratunac Crisis Staff
[REDACTED]	[REDACTED]
NIKOLIĆ, Momir	1992: Chief of Bratunac TO Staff and member of Bratunac Crisis Staff 1995: Chief of Security and Intelligence, Bratunac Brigade
NIKOLIĆ, Nedo	Director, Ciglana/brickworks company in Bratunac
NIKOLIĆ, Vinko	Member of SOS in Sanski Most; member of Sanski Most Crisis Staff
NINKOVIĆ, Živomir	Commander of VRS Air Force and Anti-Aircraft Defence
NIŠKI	<i>See</i> Svetozar MITROVIĆ
NOVAKOVIĆ, Milan	Assembly Deputy from Bijeljina; member of SDS Main Board; President of Bijeljina SDS Municipal Board; Member of Bijeljina Crisis Staff
NOVAKOVIĆ, Capt Slavko	Officer, Logistics Sector, Drina Corps
NUHANOVIĆ, Ibro	Representative of Srebrenica Muslims at Third Fontana Meeting
OBRADOVIĆ, Budimir	Member of Serbian TO, Novo Sarajevo
OBRADOVIĆ, Dragomir	Commander of Sokolac Traffic Police Station, later Commander of SJB Sokolac from at least October 1992; member of Sokolac Crisis Staff
OBRADOVIĆ, Col Ljubomir	Assistant Chief of Section, Operations Affairs, VRS Main Staff
OBRENOVIĆ, Dragan	1992: Member of Zvornik War Staff, Commander of Armoured Bn 1993-1995: Deputy Commander and Chief of Staff, Zvornik Brigade, Drina Corps, VRS

Name / Pseudonym	Description
OGATA, Sadako	UN High Commissioner for Refugees
OGNJENović, Col Slavko	Operations and Training Section, Drina Corps
OKUN, Herbert	American diplomat, deputy to Cyrus VANCE
OSMANović, Čamila	Representative of Srebrenica Muslims at Third Fontana Meeting
OSTOJIĆ, Jovo	Commander of paramilitary "Šoša detachment" in Vogošća
OSTOJIĆ, Lazar	Commander, 1st Battalion, Bratunac Brigade
OSTOJIĆ, Velibor	R BiH, later RS, Minister of Information; Republican Commissioner in Foča until June 1992
OVERGARD, Maj Thomas	Norwegian military officer; UNMO in Sarajevo Oct 1994-May 1995
OWEN, David Lord	EU Co-Chairman, with VANCE, of Conference for the Former Yugoslavia
PALIĆ, Col Avdo	Commander, Žepa Brigade, ABiH
"PALIJA"	Member of 6 th Brigade, Sanski Most
PANDUREVIĆ, Major Vinko	Commander, Višegrad Town Defence Command; 1995 Commander, Zvornik Infantry Brigade
PANTELIC, Miloš	Member of Zvornik War Staff, May 1992
PANIĆ, Petko	Assistant Commander for Reserve Police, Zvornik 1992
PANTIĆ, Dragan	Assistant Commander for Moral and Information, 1 st Battalion, Zvornik Brigade
PANTIĆ, Radislav	Head, Logistic Transport Service, Zvornik Brigade
PANTIĆ, Radomir	Commander, 1st Zvornik PJP Company, RS MUP
PARAŠ, Miroslav	Commander, Intervention Platoon, SJB Prijedor
PAŠIĆ, Radomir	President of SDS Municipal Board for Bosanski Novi; President of Bosanski Novi Crisis Staff
PAUNOVIĆ, Dragoje a.k.a. "ŠPIRO"	Commander of a unit, Rogatica Brigade, VRS
PAVLOVIĆ, Marko a.k.a. Branko POPOVIĆ	Agent of State Security Service, MUP of Serbia; Commander of Serb TO, Zvornik
PEĆANAC, Capt 1 st Class Dragomir	Officer, Sector for Intelligence and Security Affairs, VRS Main Staff
PEJIĆ, Marko a.k.a. "PEJA"	ARKAN's deputy in Zvornik
PELEMIŠ, Lt Milorad	Commander, 10th Sabotage Detachment, VRS Main Staff
PEPIĆ, Milenko	Member, 2nd Šekovići Detachment, PJP, RS MUP
PERANOVIĆ, Jovo	Commander of Serb TO, Vogošća
PERIĆ, Mirko	Member of police forces, SJB Bratunac
PERIĆ, Slavko	Chief of Security, 1st Battalion, Zvornik Brigade
PERIŠIĆ, Momčilo	Chief of General Staff, VJ, 1993-1998
PETRIČEVIĆ, Stevo	Member of SDS Rajlovac; member of Serb forces
PETROVIĆ, Mile	Deputy Commander, Military Police Platoon, Bratunac Brigade
PETROVIĆ, Radika	Commander, 4th Battalion, Bratunac Brigade
PETROVIĆ, Zoran a.k.a. "PIROĆANAC"	Serbian Journalist
PIVARSKI, Stojan	Commander of a paramilitary unit in Zvornik
PLAVŠIĆ, Biljana	Member of BiH, later RS Presidency; War Commissioner for

Name / Pseudonym	Description
	Pale
POPARIĆ, Mile	Investigator for Artillery Ammunition, Technical Testing Center, Belgrade
POPLAŠEN, Nikola	Republic Commissioner for Vogošća; President of Serbian Radical Party in RS
POPOVIĆ, Col Božidar	Commander of Manjača Camp
POPOVIĆ, Branko a.k.a. Marko PAVLOVIĆ	Agent, State Security Service, MUP of Serbia; Commander of Serb TO, Zvornik
POPOVIĆ, Lt Col Vujadin	Chief of Security, Drina Corps
POTPARA, Col Milić	Commander of Artillery Training Centre, Sarajevo
PREMOVIĆ, Tomislav	Serbian-American businessman, associate of Srđa TRIFKOVIĆ
PRIJIĆ, Milivoje	Member of SDS Executive Board; President of Novo Sarajevo SDS Municipal Board; President of Novo Sarajevo municipality
PRSTOJEVIĆ, Nedeljko a.k.a. "Nedo"	President of SDS Municipal Board in Ilidža; President of Ilidža Crisis Staff
PUDIĆ, Branko	Member of SJB Brčko
"PUFTA"	See Željko KRSMANOVIĆ
PUHALO, Branislav	Driver for General MLADIĆ
RADAN, Branko	President, Novo Sarajevo municipal Executive Committee
RADETIĆ, Dragan	VRS Military Prosecutor
RADIĆ, Borislav a.k.a. "Boro"	Commander of Special Detachment, Vogošća Brigade, VRS
RADIĆ, Predrag	Member of SDS Main Board; President of Municipal Assembly of Banja Luka; President of Banja Luka municipal War Presidency
RADIĆ, Ratko	President of Hadžići SDS municipal board; President of Hadžići Municipal Assembly
RADIĆ, Stevo	Member of Zvornik Interim Government
RADIĆ, Trifko	Assembly deputy from Ilijaš; from 1993, President of Assembly of Serbian Sarajevo
RADINOVIĆ, Radovan	Defence military expert witness
RADOJIČIĆ, Vladimir	Commander, 1 st Ilidža Brigade, January 1993-1995
RADOVIĆ, Goran	Head of CRDB, Bijeljina
RADULOVIĆ, Predrag	SNB/RDB police operative code-named "Miloš", CSB Banja Luka
RAŠEVIĆ, Mitar	Chief of Security, KP Dom Foča
RAŠKOVIĆ, Jovan	Croatian Serb leader, founder of SDS in Croatia
RAŠULA, Nedeljko	Assembly Deputy from Sanski Most; President of Sanski Most Crisis Staff
RAVE, Sgt Maj Evert	Liaison Officer and Advisor of Field Security, DutchBat
RAZDOLJAC, 2 nd Lt Đoko	Assistant Commander, Logistics, Rogatica Brigade
RAŽNATOVIĆ, Željko a.k.a. "ARKAN"	Commander, Serbian Volunteer Guard a.k.a. <i>Tigers</i> paramilitary group
RELJIĆ, Captain Nikola	Commander of unit, Novi Sad Corps, JNA stationed in

Name / Pseudonym	Description
	Bratunac area
RENOVICA, Mile	Head of Department, SDB Zvornik
REPIĆ	<i>See</i> Dušan VUČKOVIĆ
RIKANOVIĆ, Nikola	Member of Engineering Company, Zvornik Brigade
RISTANIĆ, Đorđe	President of Serbian Assembly of Brčko; President of Brčko War Presidency
RISTANOVIĆ, Cvijetin	Excavator Operator, Zvornik Brigade
RISTANOVIĆ, Ljubo	Member of Zvornik Brigade
RISTIĆ, Lazar	Deputy Commander, 4th Battalion, Zvornik Brigade
RISTIĆ, Mirko	Member of Military Police, Zvornik Brigade
RISTIĆ, Nebojša	Bodyguard for Radovan KARADŽIĆ
RISTIĆ, Predrag	Member of Military Police, Zvornik Brigade
RISTIĆ, Rade	Member of Ilidža Crisis Staff
RODIĆ, Jugoslav	Member of Banja Luka CSB
ROHDE, David	American journalist
ROSE, Gen Sir Michael	UK General; Commander of UNPROFOR in BiH 1994-1995
ROSIĆ, Jovo	Member of ARK Crisis Staff; RS Minister of Justice, 1993-1995
RUSSELL, Major John	Canadian army officer; Military Assistant to Deputy Special Representative of Secretary General
RUTTEN, Lt Johannes	Patrol Co-ordinator and Intelligence Officer, DutchBat, Srebrenica
SABLJICA, Mirza	Expert in ballistic and mechanical traces, MUP BiH
SAJIĆ, Milorad	Commander, TO Banja Luka; member of ARK Crisis Staff
SALAPURA, Col Petar	Chief of Intelligence Administration, VRS Main Staff
ŠAMARA, Dejan	Police Inspector, CSB Banja Luka
SAMARDŽIJA, Lt Col Drago	Commander, 17 th Light Infantry Brigade, Ključ; Member of Ključ War Presidency
ŠARAC, Jovan	President of Pale SDS Municipal Board; member of Pale Crisis Staff
SARIĆ, Goran	Commander, Special Police Brigade (PJP), RS MUP
SARKIĆ, Major FNU	Chief of Staff, Milići Infantry Bgd, later Vlasenica Inf Bgd
SAVANOVIĆ, Boro	President of SDS Deputies' Club in Sanski Most; member of Sanski Most Crisis Staff
SAVČIĆ, Col Milomir	Commander, 65th ZMTP, VRS Main Staff
SAVIĆ, Ljubiša a.k.a. "MAUZER"	Commander of Serbian National Guard/Panthers paramilitary group; Member of Bijeljina Crisis Staff
SAVKIĆ, Tomislav	President of Vlasenica SDS municipal board; President of Milići Crisis Staff; President of Milići Municipal Assembly; Commander, 1 st Infantry Battalion Milići; Assembly deputy
SCHMITZ, Christine	Field Coordinator, <i>Médecins Sans Frontières</i> , Srebrenica
ŠEHOVAC, Major, later Lt Col Milorad	Commander, 2 nd Sarajevo Light Infantry Brigade, SRK; 1995, in Operations Department, SRK Command
ŠESELJ, Vojislav	Head of Serbian Radical Party (SRS)
SIKIRICA, Dušan	Commander of Security, Keraterm camp, Prijedor
SIMANIĆ, Maj Mile	Deputy Commander, 5th Engineering Battalion, Drina Corps
SIMATOVIĆ, Franko a.k.a. "FRENKI"	Member of State Security Service, MUP, Republic of Serbia
SIMETIĆ, Simo	Member of VRS Sanski Most

Name / Pseudonym	Description
SIMIĆ, Branko	Assembly Deputy from Mostar; Republic War Commissioner for Han Pijesak
SIMIĆ, Gojko	Member of 2nd Company, 4th Battalion, Zvornik Brigade
SIMIĆ, Ljubisav	President of Serbian Municipal Assembly of Bratunac; Member of Bratunac Crisis Staff
SIMIĆ, Milomir	Member of Military Police, Zvornik Brigade
SIMIĆ, Gen Maj Novica	Commander, East Bosnia Corps, VRS
SIMIĆ, Savo	Chief of Artillery, 1 st Sarajevo Mechanised Brigade, SRK May 1992-May 1994; Commander, 4 th Mixed Artillery Regiment, SRK May 1994-April 1995
SIMONOVIĆ, Konstantin	Member of SJB Brčko, May-Oct 1992
SIMOVIĆ, Miodrag	Vice-President of Government BiH, Jan 1991-October 1993; Chairman of Council of Ministers of Serbian Republic of BiH
SINANOVIĆ, Rešid	Former Chief of Police, SJB Bratunac
ŠIPČIĆ, Mitar	Member of Foča Crisis Staff
ŠIPČIĆ, General Tomislav	Commander of Sarajevo Romanija Corps, May-August 1992
ŠKILJEVIĆ, Soniboj	Warden of Kula Prison
SKOKO, Milorad	Prewar Deputy Director of BH Republic Centre for Social Planning; Minister without Portfolio in first RS Council of Ministers; later RS Minister for Industry and Energy
ŠKONDRIĆ, Vaso	Police Inspector, CSB Banja Luka
ŠKRBA, Dušan	Commander, Mixed artillery battalion, 1 st Sarajevo Mechanised Brigade, SRK
ŠKRBIĆ, Gen Maj Petar	Assistant Commander, Organisation, Mobilisation, and Personnel Affairs, VRS Main Staff
SMITH, Gen Rupert	UK General; Commander of UNPROFOR in BiH in 1995
ŠOJA, Milomir	Member of VRS until Dec 1994; from Jan 1995, electrical engineer in Energoinvest Automatika, Ilidža
SOKOLOVIĆ, Milorad	President of Rogatica Crisis Staff; Chairman of Rogatica municipal Executive Board
SOMMARUGA, Cornelio	Swiss diplomat; President of International Committee of the Red Cross 1987-1999
[REDACTED]	[REDACTED]
SRDIĆ, Srđo	Member of SDS Main Board; Assembly deputy from Prijedor
STAKIĆ, Milomir	President of Prijedor Crisis Staff; Prijedor representative to ARK Assembly
STANIĆ, Mićo	Member of 2nd Battalion, Zvornik Brigade
STANIĆ, Milenko	President of Vlasenica Municipal Assembly; President of Vlasenica Crisis Staff; President of SAO Birač Executive Board; later RS Minister for Trade and Supplies
STANIĆ, Miroslav	Member of SDS Main Board; President of Foča Crisis Staff; War Commander in Foča until June 1992
STANIĆ, Radenko	Police Commander, SJB Vlasenica
STANIĆ, Svetozar	President of Vogošća Municipal Assembly; member of Vogošća Crisis Staff
STANIŠIĆ, Jovica	Head of State Security Service, MUP, Republic of Serbia
STANIŠIĆ, Mićo	Minister of Interior, RS MUP

Name / Pseudonym	Description
STANIŠIĆ, Ostoja	Commander, 6th Battalion, Zvornik Brigade
STANKOVIĆ, Ljubomir	Member of 1 st Srbac Light Military Police Brigade; convicted of killing Muslim civilians in Srbac
STANKOVIĆ, Radovan	Member of Tactical Group Foča, VRS
STANOJEVIĆ, Dobrislav	Member of 1st Zvornik PJP Company
STANOJEVIĆ, Miroslav	Member of Bratunac Brigade Red Berets
STEVANDIĆ, Nenad	Commander of SOS (“Serbian Defence Forces”) in ARK; member of ARK Crisis Staff
STEVANOVIĆ, Željko	Member of Military Police, Zvornik Brigade
STOJANOVIĆ, Mile	Commander, detention center in Rajlovac barracks; Head of section in VRS military police
STOJANOVIĆ, Nada	Member of Military Police, Zvornik Brigade
STOJKOVIĆ, Slobodan	Member of Scorpions Special Unit, MUP of Serbia
STOLTENBERG, Thorvald	Special Representative of UN Secretary-General for the former Yugoslavia; UN Co-Chairman of the International Conference on the former Yugoslavia
STUDEN, Branko	Member of TO Zvornik, 1992; Commander, 4 th Infantry Company, Zvornik Brigade 1995
ŠTUPAR, Miloš	Commander, 2nd Šekovići Detachment, Special Police Brigade, RS MUP
SUBOTIĆ, Bogdan	RS Minister of Defence
SUBOTIĆ, Zorica	Ballistics expert, Ministry of Justice, Serbia
ŠUGIĆ, Miladin	VRS soldier, suspected of killing Muslims in Čelinac
ŠUGIĆ, Obrenko	VRS soldier, suspected of killing Muslims in Čelinac
TALIĆ, Momir	Commander, 1 st Krajina Corps; Member of ARK Crisis Staff
TANACKOVIĆ, Dušan	Chief of Security, VRS East Bosnia Corps
TANIĆ, Tanacko	Member of Command staff, Zvornik Brigade
TEPAVČEVIĆ, Milan	SDB official responsible for war operations in Eastern Bosnia, MUP, Republic of Serbia
TEŠIĆ, Aleksandar	Secretary of Bratunac municipal Secretariat of National Defence; member of Bratunac Crisis Staff
TETTEH, Maj David	UNMO, Srebrenica
THEUNENS, Reynaud	Former Military expert, OTP, UN ICTY
THOMAS, Major Francis Roy	Canadian army officer; Senior Military Observer in Sarajevo, Oct 1993-July 1994
TINTOR, Jovan	Member of SDS Main Board; President of Vogošća Crisis Staff
TODOROVIĆ, Dragan	Member of 10th Sabotage Detachment, VRS Main Staff
TODOROVIĆ, Milenko	Chief of Intelligence and Security, East Bosnia Corps
TODOROVIĆ, Novak	President of the Supreme Military Court, VRS
TOLIMIR, Zdravko	VRS General; Assistant Commander of VRS for Intelligence and Security at time of Srebrenica
TOMIĆ, Milenko	Driver, R Battalion, Zvornik Brigade
TOMIĆ, Vito	SDB Operative, Bratunac
TOMIĆ, Zoran	VRS soldier, accused of killings in Bijeljina
TOPALOVIĆ, Dragan	Driver, 6th Battalion, Zvornik Brigade
TORLAK, Hamdija	President of Žepa Executive Board; Member of Žepa War Presidency

Name / Pseudonym	Description
TOŠIĆ, Momir	Assembly Deputy from Han Pijesak
TRBIĆ, Capt Milorad	Security Officer, Zvornik Brigade
TRIFKOVIĆ, Risto	Member of 2nd Company, 4th Battalion, Zvornik Brigade
TRIFKOVIĆ, Srđa	Foreign Affairs Editor, <i>Chronicles</i>
TRIFUNOVIĆ, Miladin	Commander of Vogošća Infantry Brigade
TRIFUNOVIĆ, Milenko	Commander, Skelani Platoon, 2 nd Šekovići Detachment, SBP, RS MUP
TRIŠIĆ, Dragoslav	Assistant Commander, Rear Services, Bratunac Brigade
TRIVIĆ, Col Mirko	Commander, 2nd Romanija Motorized Brigade
TRKULJA, Col Nedeljko	Chief, Armoured Mechanized Services, VRS Main Staff
TUCKER, Pyers	British Army officer; Military Assistant to UNPROFOR Commander, October 1992-March 1993
TUĐMAN, Franjo	President of Croatia
TUPAJIĆ, Milan	President of Sokolac Municipal Assembly; President of the Sokolac Crisis Staff
TURKUŠIĆ, Emir	Engineer; shelling investigator, MUP BiH
TUŠEVLJAK, Slobodan	Platoon commander, 2 nd battalion, 1 st Sarajevo mechanized brigade, SRK, VRS
UJIĆ, Mile	President of Rogatica municipal Executive Council; Member of Rogatica Crisis Staff; VRS Rogatica Brigade Chief of Staff and main artillery coordinator
ULEMEK, Milorad a.k.a. "LEGIJA"	Member of ARKAN's Tigers; later Commander of Red Berets Special Forces, MUP of Serbia
UŠĆUMLIĆ, Petar	Interpreter for UNMOs, Srebrenica
VAN DER WEIJDEN, Lt Patrick	Dutch army officer; sniping expert
VAN DUIJN, Lt Leendert	Member of DutchBat, Srebrenica
VAN LYNDEN, Aernout	Sky News War Correspondent
VAN RENSSSEN, Raviv	Member of DutchBat, Srebrenica
VAN SCHAİK, Sgt Maj	Member of DutchBat, Srebrenica
VANCE, Cyrus	Special Envoy of UN Secretary-General for Croatia and Bosnia; UN Co-Chairman, with OWEN, of Conference on former Yugoslavia; former US Secretary of State
VASIĆ, Dragomir	Chief of CJB Zvornik 1995
VASILIĆ, Marinko	Chief of SJB Zvornik 1992
VASILJEVIĆ, Mladen	Commander of Rogatica SJB; member of Rogatica CS
VASILJKOVIĆ, Dragan a.k.a. "CAPTAIN DRAGAN," "Daniel Sneddon"	Leader of Serb paramilitary group, associated with State Security Service of Republic of Serbia
VELJOVIĆ, Stevan	Operations Officer in 216 th Mountain Brigade, later 1 st Romanija Brigade, SRK, VRS
VERDY, Captain	Analyst, UNPROFOR Sarajevo
VERSTEEG, Lt Michel	Member of DutchBat, Srebrenica
VESELIĆ, Dragan	Chief of Brčko Serb SJB; member of Brčko War Presidency
VESELINOVIĆ, Sveto	President of SDS Rogatica Municipal Board; President of SDS Romanija Regional Board; President of Rogatica SDS Crisis Staff; member of Rogatica municipal Executive Board

Name / Pseudonym	Description
VIDOVIĆ, Vasilije a.k.a "VACKE"	Četnik <i>vojvoda</i> , commander of SRS unit in Ilijaš
VJEŠTICA, Miroslav	Assembly Deputy from Bosanska Krupa; President of SDS Municipal Board for Bosanska Krupa; member of Bosanska Krupa War Presidency
VLAČO, Branko	Warden of detention facilities in Vogošća
VLAHOVIĆ, Veselin a.k.a "BATKO"	VRS soldier and notorious criminal in Novo Sarajevo
VOJINOVIĆ, Milenko a.k.a. "Dr. Beli"	Assembly Deputy from Brčko; Member of SDS Main Board; President of Brčko SDS Municipal Board
VOJVODIĆ, Brane	Member of Ključ SDS Municipal Board
VRKEŠ, Vlado	President of Sanski Most SDS municipal board; member of Sanski Most Crisis Staff
[REDACTED]	[REDACTED]
VUČKOVIĆ, Dušan a.k.a "REPIĆ"	Member of the "Yellow Wasps" paramilitaries in Zvornik
VUČKOVIĆ, Vojin a.k.a. "ŽUĆO" or "ŽUĆA"	Leader of the "Yellow Wasps" paramilitaries in Zvornik
VUČUREVIĆ, Božidar	Member of SDS Main Board; President of SDS municipal board for Trebinje; President of Trebinje Municipal Assembly; President of Trebinje Crisis Staff; President of Assembly of SAO Hercegovina
VUJOVIĆ, Lt Ratko	Member of Military Police, Drina Corps
VUKAŠEVIĆ, Lt Col Milorad	Acting Commander of 1st Infantry Brigade, Ključ
VUKOJEVIĆ, Zoran	Member of 6 th Brigade, Sanski Most
VUKOVIĆ, Drago	Member of Bijeljina Crisis Staff; Head of Bijeljina SDB from approximately August 1992
VUKOVIĆ, Ranko	Chief of RS Republic Communications Centre, Pale
VULIN, Dragiša	Commander, Military Police, East Bosnia Corps
VULLAIMY, Edward	English journalist, Bosnian correspondent for <i>The Guardian</i>
WILSON, Gen John	Australian military officer; Chief of UN Military Observers for UNPROFOR, March-December 1992
WOOD, Lt Col David	British military officer; Commander, Joint Commission Observers, UNPROFOR
ZAIMOVIĆ, Fatima	Head Nurse, Pediatric Surgery, Koševo Hospital, Sarajevo
ZAMETICA, John a.k.a. Jovan	Bosnian-British political scientist, Presidential advisor to KARADŽIĆ 1994-1995
ZEČEVIĆ, Berko	Ballistics Expert; Head of Defence Technology Department, Mechanical Engineering Faculty, University of Sarajevo
[REDACTED]	[REDACTED]
ZELAJA, Major Radomir	Deputy Commander, later Commander, 43 rd mtbr Prijedor, 1KK
ŽEPINIĆ, Vitomir	Deputy Minister of Interior in prewar BiH Government
ŽIGIĆ, Zoran	VRS soldier, convicted at ICTY of crimes at Omarska and Keraterm
ŽIVANOVIĆ, Gen Maj Milenko	Commander of VRS Drina Corps Nov 1992-13 July 1995

Name / Pseudonym	Description
ŽIŽOVIĆ, Desimir	Communications specialist, Rogatica Brigade
ZOLJIĆ, Danilo	Commander, Zvornik CJB Company, MUP
ŽUĆO/ŽUĆA	<i>See Vojin VUČKOVIĆ</i>
ŽUPLJANIN, Stojan	Chief of Banja Luka CSB; member of ARK Crisis Staff