

THE INTERNATIONAL CRIMINAL TRIBUNAL FOR THE FORMER YUGOSLAVIA

Case No. IT-01-51-I

THE PROSECUTOR OF THE TRIBUNAL

AGAINST

SLOBODAN MILOSEVIC

INDICTMENT

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

SLOBODAN MILOSEVIC

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

THE ACCUSED

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

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

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

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

INDIVIDUAL CRIMINAL RESPONSIBILITY

Article 7(1) of the Statute of the Tribunal

5. **Slobodan MILOSEVIC** is individually criminally responsible for the crimes referred to in Articles 2, 3, 4 and 5 of the Statute of the Tribunal as described in this indictment, which he planned, instigated, ordered, committed, or in whose planning, preparation, or execution he otherwise aided and abetted. By using the word "committed" in this indictment, the Prosecutor does not intend to suggest that the accused physically committed any of the crimes charged personally. "Committed" in this indictment refers to participation in a joint criminal enterprise as a co-perpetrator.

6. **Slobodan MILOSEVIC** participated in the joint criminal enterprise as set out below. The purpose of this joint criminal enterprise was the forcible and permanent removal of the majority of non-Serbs, principally Bosnian Muslims and Bosnian Croats, from large areas of the Republic of Bosnia and Herzegovina (hereinafter referred to as "Bosnia and Herzegovina"), through the commission of crimes which are in violation of Articles 2, 3, 4 and 5 of the Statute of the Tribunal.

7. The joint criminal enterprise was in existence by 1 August 1991 and continued until at least 31 December 1995. The individuals participating in this joint criminal enterprise included **Slobodan MILOSEVIC**, Radovan KARADZIC, Momcilo KRAJISNIK, Biljana PLAVSIC, General Ratko MLADIC, Borisav JOVIC, Branko KOSTIC, Veljko KADIJEVIC, Blagoje ADZIC, Milan MARTIC, Jovica STANISIC, Franko SIMATOVIC, also known as "Frenki," Radovan STOJICIC, also known as "Badza," Vojislav SESELJ, Zeljko RAZNATOVIC, also known as "Arkan," and other known and unknown participants.

8. The crimes enumerated in Counts 1 to 29 of this indictment were within the object of the joint criminal enterprise. Alternatively, the crimes enumerated in Counts 1 to 15 and 19 to 29 were natural and foreseeable consequences of the execution of the object of the joint criminal enterprise and the accused was aware that such crimes were the possible outcome of the execution of the joint criminal enterprise.

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

10. Radovan KARADZIC was President of the Serbian Democratic Party of Bosnia and Herzegovina (*Srpska demokratska stranka Bosne i Hercegovine* or "SDS") throughout the period of the indictment. On 27 March 1992, KARADZIC became the President of the Bosnian Serb "National Security Council." On 12 May 1992, he was elected President of the three-member Presidency of the self-proclaimed Serbian Republic of Bosnia and Herzegovina (hereinafter referred to as "Republika Srpska") and remained in this position after the Presidency was expanded to five members on 2 June

1992. On 17 December 1992, KARADZIC was elected President of Republika Srpska and remained in that position throughout the period of this indictment. In his capacity as a member of the Bosnian Serb National Security Council, member of the Presidency, as President of Republika Srpska, and in his position of leadership within the SDS party and organs of the Republika Srpska government, Radovan KARADZIC, together with others, commanded, directed, or otherwise exercised effective control over the Territorial Defence ("TO"), the Bosnian Serb army ("VRS") and the police forces of Republika Srpska who participated in the crimes specified in this indictment.

11. Momcilo KRAJISNIK, a close associate of Radovan KARADZIC, was a member of the SDS Main Board from 12 July 1991. On 24 October 1991, the day of the founding of the "Assembly of the Serbian People of Bosnia and Herzegovina," (hereinafter referred to as the "Bosnian Serb Assembly") KRAJISNIK was elected its President. From 27 March 1992, KRAJISNIK was a member of the Bosnian Serb National Security Council. He became a member of the five-member Presidency on 2 June 1992. When the Bosnian Serb Assembly elected Radovan KARADZIC President of Republika Srpska on 17 December 1992, KRAJISNIK ceased to be a member of the Presidency, but continued to be one of the most important political leaders in Republika Srpska and remained the President of its National Assembly until 19 October 1996. In his capacity as a member of the Bosnian Serb National Security Council as a member of the Presidency of Republika Srpska, and in his position of leadership within the SDS party and organs of the Republika Srpska government, Momcilo KRAJISNIK, together with others, commanded, directed, or otherwise exercised effective control over the TO, the VRS and the police forces of Republika Srpska who participated in the crimes specified in this indictment.

12. Biljana PLAVSIC, a high-ranking SDS politician, on 28 February 1992, became one of two Acting Presidents of the Serbian Republic of Bosnia and Herzegovina, together with Nikola KOLJEVIC. As an Acting President, Biljana PLAVSIC became an *ex officio* member of the Bosnian Serb National Security Council. On 12 May 1992, she was elected as a member of the three-member Presidency and remained in this position after it was expanded to five members. When the Bosnian Serb Assembly elected Radovan KARADZIC President of Republika Srpska on 17 December 1992, it also elected Biljana PLAVSIC one of two Vice-Presidents, a position she held until 19 July 1996. In her capacity as Vice-President, member of the Bosnian Serb National Security Council as a member of the Presidency of Republika Srpska, and in her position of leadership within the SDS party and organs of the Republika Srpska government, Biljana PLAVSIC, together with others, commanded, directed, or otherwise exercised effective control over the TO, the VRS and the police forces of Republika Srpska who participated in the crimes specified in this indictment.

13. General Ratko MLADIC, a military career officer previously stationed in Macedonia and Kosovo, became the commander of the 9th Corps (Knin Corps) of the Yugoslav People's Army ("JNA") in June 1991 and participated in the fighting in Croatia. On 4 October 1991, the SFRY Presidency promoted him to Major General. Subsequently, in May 1992, he assumed command of the forces of the Second Military District of the JNA in Sarajevo. From 12 May 1992 until November 1996, he was the Commander of the Main Staff of the VRS and in this capacity, together with others, commanded, directed, or otherwise exercised effective control over the VRS and other units acting in co-ordination with the VRS who participated in the crimes specified in this indictment.

14. Borisav JOVIC was successively the Vice-President, President and then a member of the SFRY Presidency from 15 May 1989 until April 1992, as well as the President of the SPS from May 1991 until October 1992, and a high ranking official of the SPS until November 1995. Borisav JOVIC and Branko KOSTIC, the Vice-President and then Acting President of the Presidency of the SFRY, together with others during the relevant period, commanded, directed, or otherwise exercised

effective control over the JNA and members of the TO and paramilitary units acting in co-ordination with, and under supervision of, the JNA.

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

16. General Blagoje ADZIC, in his capacity as JNA Chief of Staff from 1990 to 28 February 1992 and Acting Federal Secretary for National Defence from mid-1991 to 28 February 1992, Federal Secretary for National Defence from 28 February 1992 to 27 April 1992 and JNA Chief of Staff from 27 April 1992 to 8 May 1992, together with others, commanded, directed, or otherwise exercised effective control over the JNA and other units acting in co-ordination with the JNA.

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

18. Franko SIMATOVIC, also known as "Frenki," as head of the special operations component of the DB of the Republic of Serbia, commanded, directed, or otherwise exercised effective control over agents of the DB who perpetrated crimes specified in this indictment. In addition, he provided arms, funds, training, or other substantial assistance or support to Serb paramilitary units and police units that were subsequently involved in the crimes charged in this indictment.

19. Radovan STOJICIC also known as "Badza" as Deputy Minister of Interior of Serbia and head of Public Security Service, commanded, directed or otherwise exercised effective control over special forces of the Serbian MUP and volunteer units who participated in the crimes specified in this indictment. In addition, he provided arms, funds, training, or other substantial assistance or support to Serb paramilitary units and police units that were subsequently involved in the crimes specified in this indictment.

20. Milan MARTIC, as "Secretary of the Secretariat of Internal Affairs" of the so-called Serbian Autonomous Region ("SAO") Krajina from 4 January 1991 until 29 May 1991; as "Minister of Defence" of the SAO Krajina from 29 May 1991 to 27 June 1991; and as "Minister of Internal Affairs" for the SAO Krajina (later "Republic of Serbian Krajina") from 27 June 1991 to January 1994, established, commanded, directed, and otherwise exercised effective control over members of his police force (referred to as "Martic's Police," "Martic's Militia," "Marticevci," "SAO Krajina Police" or "SAO Krajina Militia") who were subsequently involved in the crimes specified in this indictment.

21. Zeljko RAZNATOVIC, also known as "Arkan," in 1990 established and commanded the Serbian Volunteer Guard, a paramilitary unit commonly known as "Arkanovci" or "Arkan's Tigers," who during the time relevant to this indictment operated in Bosnia and Herzegovina and were involved in the crimes charged in this indictment. In addition, he maintained a significant military base in Erdut, Croatia, where he functioned as commander. Other paramilitary groups and TO units were trained at this base and were subsequently involved in the crimes charged in this indictment.

22. Vojislav SESELJ, as President of the Serbian Radical Party (SRS) from at least February 1991

throughout the time relevant to this indictment recruited or otherwise provided substantial assistance or support to Serb paramilitary units, commonly known as "Seseljvci" or "Seselj's men," who perpetrated crimes as specified in this indictment. In addition, he openly espoused and encouraged the creation of a "Greater Serbia" by violence and other unlawful means, and actively participated in war propaganda and spreading inter-ethnic hatred.

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

24. In his capacity as the President of Serbia and through his leading position in the SPS party, **Slobodan MILOSEVIC** exercised effective control or substantial influence over the above listed participants in the joint criminal enterprise and either alone or acting in concert with them and additional known and unknown persons effectively controlled or substantially influenced the actions of the Federal Presidency of the SFRY and later the FRY, the Serbian Ministry of Internal Affairs ("MUP"), the JNA, the Yugoslav Army ("VJ") and the VRS, as well as Serb paramilitary groups.

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

- a) He exerted effective control over elements of the JNA and VJ which participated in the planning, preparation, facilitation and execution of the forcible removal of the majority of non-Serbs, principally Bosnian Muslims and Bosnian Croats, from large areas of Bosnia and Herzegovina.
- b) He provided financial, logistical and political support to the VRS. These forces subsequently participated in the execution of the joint criminal enterprise through the commission of crimes which are in violation of Articles 2, 3, 4 and 5 of the Statute of the Tribunal.
- c) He exercised substantial influence over, and assisted, the political leadership of Republika Srpska in the planning, preparation, facilitation and execution of the take-over of municipalities in Bosnia and Herzegovina and the subsequent forcible removal of the majority of non-Serbs, principally Bosnian Muslims and Bosnian Croats, from those municipalities.
- d) He participated in the planning and preparation of the take-over of municipalities in Bosnia and Herzegovina and the subsequent forcible removal of the majority of non-Serbs, principally Bosnian Muslims and Bosnian Croats, from those municipalities. He provided the financial, material and logistical support necessary for such take-over.
- e) He participated in the formation, financing, supply, support and direction of special forces of the Republic of Serbia Ministry of Internal Affairs. These special forces participated in the execution of the joint criminal enterprise through the commission of crimes which are in violation of Articles 2, 3, 4 and 5 of the Statute of the Tribunal.
- f) He participated in providing financial, logistical and political support and direction to Serbian irregular forces or paramilitaries. These forces participated in the execution of the joint criminal enterprise through the commission of crimes which are in violation of

Articles 2, 3, 4 and 5 of the Statute of the Tribunal.

g) He controlled, manipulated or otherwise utilised Serbian state-run media to spread exaggerated and false messages of ethnically based attacks by Bosnian Muslims and Croats against Serb people intended to create an atmosphere of fear and hatred among Serbs living in Serbia, Croatia and Bosnia and Herzegovina which contributed to the forcible removal of the majority of non-Serbs, principally Bosnian Muslims and Bosnian Croats, from large areas of Bosnia and Herzegovina.

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

Article 7(3) of the Statute of the Tribunal

27. **Slobodan MILOSEVIC**, while holding positions of superior authority, is also individually criminally responsible for the acts or omissions of his subordinates, pursuant to Article 7(3) of the Statute of the Tribunal. A superior is responsible for the criminal acts of his subordinates if he knew or had reason to know that his subordinates were about to commit such acts or had done so, and the superior failed to take the necessary and reasonable measures to prevent such acts or to punish the perpetrators.

28. From at least March 1991 until 15 June 1992, **Slobodan MILOSEVIC** exercised effective control over the four members of the "Serbian Bloc" within the Presidency of the SFRY. These four individuals were Borisav JOVIC, the representative of the Republic of Serbia; Branko KOSTIC, the representative of the Republic of Montenegro; Jugoslav KOSTIC, the representative of the Autonomous Province of Vojvodina; and Sejdo BAJRAMOVIC, the representative of the Autonomous Province of Kosovo and Metohija. **Slobodan MILOSEVIC** used Borisav JOVIC and Branko KOSTIC as his primary agents in the Presidency and through them he directed the actions of the "Serbian Bloc." From 1 October 1991, in the absence of the representatives of the Presidency from Croatia, Slovenia, Macedonia and Bosnia and Herzegovina, the four members of the "Serbian Bloc" exercised the powers of the Presidency, including that of collective "Commander-in-Chief" of the JNA. This "Rump Presidency" acted without dissension to execute **Slobodan MILOSEVIC's** policies. The Federal Presidency had effective control over the JNA as its "Commander-in-Chief" and other units under the supervision of the JNA. Generals Veljko KADIJEVIC and Blagoje ADZIC, who directed and supervised the JNA forces in Bosnia and Herzegovina, were in constant communication and consultation with the accused.

29. On 27 April 1992, the Supreme Defence Council was formed. Throughout the time relevant to this indictment, **Slobodan MILOSEVIC** was a member of the Supreme Defence Council and exercised substantial influence and control over other members of the Council. The Supreme Defence Council and the President of the FRY had *de jure* control over the JNA and later the VJ. In addition to his *de jure* powers, at all times relevant to this indictment, **Slobodan MILOSEVIC** exercised *de facto* control over the JNA and the VJ through his control over the high ranking officers of these armies.

30. **Slobodan MILOSEVIC** is therefore individually criminally responsible, under Article 7(3) of the Statute of the Tribunal, for the participation of the members of the JNA and the VJ and other

units under the supervision of the JNA and the VJ in the crimes described in this indictment.

31. From the time **Slobodan MILOSEVIC** came to power in Serbia, he exercised control over key officials in the Serbian MUP, among them Radmilo BOGDANOVIC and Zoran SOKOLOVIC, who were both, at different times, the Minister of Internal Affairs of Serbia. He also exercised control over Jovica STANISIC and Franko SIMATOVIC, both high-ranking officials in the DB. Through these officials, **Slobodan MILOSEVIC** exercised effective control over agents of the MUP, including the DB, who directed and supported the actions of the special forces and Serb paramilitary groups operating in Bosnia and Herzegovina. The accused **Slobodan MILOSEVIC** is therefore individually criminally responsible, under Article 7(3) of the Statute of the Tribunal, for the participation of the members of the Serbian MUP, including the DB, in the crimes described in this indictment.

THE CHARGES

COUNTS 1 and 2 GENOCIDE OR COMPLICITY IN GENOCIDE

32. From on or about 1 March 1992 until 31 December 1995, **Slobodan MILOSEVIC**, acting alone or in concert with other members of the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation and execution of the destruction, in whole or in part, of the Bosnian Muslim and Bosnian Croat national, ethnical, racial or religious groups, as such, in territories within Bosnia and Herzegovina, including: Bijeljina; Bosanski Novi; Bosanski Samac; Bratunac; Brcko; Doboj; Foca; Sarajevo (Ilijas); Kljuc; Kotor Varos; Sarajevo (Novi Grad); Prijedor; Rogatica; Sanski Most; Srebrenica; Visegrad; Vlasenica and Zvornik. The destruction of these groups was effected by:

a) The widespread killing of thousands of Bosnian Muslims and Bosnian Croats, during and after the take-over of territories within Bosnia and Herzegovina, including those listed above, as specified in **Schedule A** to this indictment. In many of the territories, educated and leading members of these groups were specifically targeted for execution, often in accordance with pre-prepared lists. After the fall of Srebrenica in July 1995, almost all captured Bosnian Muslim men and boys, altogether several thousands, were executed at the places where they had been captured or at sites to which they had been transported for execution.

b) The killing of thousands of Bosnian Muslims and Bosnian Croats in detention facilities within Bosnia and Herzegovina, including those situated within the territories listed above, as specified in **Schedule B** to this indictment.

c) The causing of serious bodily and mental harm to thousands of Bosnian Muslims and Bosnian Croats during their confinement in detention facilities within Bosnia and Herzegovina, including those situated within the territories listed above, as specified in **Schedule C** to this indictment. Members of these groups, during their confinement in detention facilities and during their interrogation at these locations, police stations and military barracks, were continuously subjected to, or forced to witness, inhumane acts, including murder, sexual violence, torture and beatings.

d) The detention of thousands of Bosnian Muslims and Bosnian Croats in detention facilities within Bosnia and Herzegovina, including those situated within the territories

listed above, under conditions of life calculated to bring about the partial physical destruction of those groups, namely through starvation, contaminated water, forced labour, inadequate medical care and constant physical and psychological assault.

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

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

Count 2: COMPLICITY IN GENOCIDE, punishable under Articles 4(3)(e) and 7(1) and 7(3) of the Statute of the Tribunal.

COUNT 3 PERSECUTIONS

33. From on or about 1 March 1992 until 31 December 1995, **Slobodan MILOSEVIC**, acting alone or in concert with members of the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of persecutions of non-Serbs, principally Bosnian Muslims and Bosnian Croats, within the territories of Banja Luka; Bihać; Bijeljina; Bileća; Bosanska Dubica; Bosanska Gradiska; Bosanska Krupa; Bosanski Novi; Bosanski Petrovac; Bosanski Samac; Bratunac; Brčko; Čajnice; Čelinac; Doboј; Donji Vakuf; Foča; Gacko; Gorazde, Sarajevo (Hadžici); Sarajevo (Ilidza); Sarajevo (Ilijas); Ključ; Kalinovik; Kotor Varos; Nevesinje; Sarajevo (Novi Grad); Sarajevo (Novo Sarajevo); Sarajevo (Pale); Prijedor; Prnjavor; Rogatica; Rudo; Sanski Most; Sekovici; Sipovo; Sokolac; Srebrenica; Teslić; Trebinje; Sarajevo (Trnovo); Visegrad; Vlasenica; Sarajevo (Vogošća) and Zvornik.

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

35. These persecutions were committed on the discriminatory grounds of political affiliation, race or religion and included:

a) The extermination or murder of thousands of Bosnian Muslim, Bosnian Croat and other non-Serb civilians, including women and the elderly, in those territories listed above, the details of which are set out in **Schedules A and B** to this indictment.

b) The prolonged and routine imprisonment and confinement of thousands of Bosnian Muslim, Bosnian Croat and other non-Serb civilians in detention facilities within and outside of Bosnia and Herzegovina, the details of which are set out in **Schedule C** to this indictment.

c) The establishment and perpetuation of inhumane living conditions against Bosnian Muslim, Bosnian Croat and other non-Serb civilians, within the above mentioned detention facilities. These living conditions were brutal and characterised by inhumane treatment, overcrowding, starvation, forced labour and systematic physical and psychological abuse, including torture, beatings and sexual assault.

- d) The prolonged and frequent forced labour of Bosnian Muslim, Bosnian Croat and other non-Serb civilians, from these detention facilities. The forced labour included digging graves and trenches and other forms of manual labour at the frontlines.
- e) The cruel and inhumane treatment of Bosnian Muslim, Bosnian Croat and other non-Serb civilians during and after the take-over of the municipalities specified above. Such inhumane treatment included, but was not limited to, sexual violence, torture, physical and psychological abuse and forced existence under inhumane living conditions.
- f) The imposition of restrictive and discriminatory measures against Bosnian Muslims, Bosnian Croats and other non-Serbs, such as, the restriction of freedom of movement; removal from positions of authority in local government institutions and the police; dismissal from jobs; arbitrary searches of their homes; denial of the right to judicial process and the denial of the right of equal access to public services, including proper medical care.
- g) The beating and robbing of Bosnian Muslim, Bosnian Croat and other non-Serb civilians.
- h) The forcible transfer and deportation of thousands of Bosnian Muslim, Bosnian Croat and other non-Serb civilians, from the territories listed above, to locations outside of Serb held territories as described in paragraphs 40 and 41 and **Schedule D** to this indictment.
- i) The appropriation and plunder of property belonging to Bosnian Muslim, Bosnian Croat and other non-Serb civilians.
- j) The intentional and wanton destruction of homes, other public and private property belonging to Bosnian Muslims and Bosnian Croats, their cultural and religious institutions, historical monuments and other sacred sites, as described in paragraph 42.
- k) The obstruction of humanitarian aid, in particular medical and food supplies into the besieged enclaves Bihac, Gorazde, Srebrenica and Zepa, and the deprivation of water from the civilians trapped in the enclaves designed to create unbearable living conditions.

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

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

COUNTS 4 to 7 EXTERMINATION, MURDER AND WILFUL KILLING

36. From on or about 1 March 1992 until 31 December 1995, **Slobodan MILOSEVIC**, acting alone or in concert with other members of the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the extermination, murder and wilful killings of non-Serbs, principally Bosnian Muslims and Bosnian

Croats living in the territories of Banja Luka; Bihac; Bijeljina; Bileca;; Bosanska Gradiska; Bosanska Krupa; Bosanski Novi; Bosanski Petrovac; Bosanski Samac; Bratunac; Brcko; Cajnice; Celinac; Doboj; Foca; Gacko; Sarajevo (Ilijas); Kljuc; Kalinovik; Kotor Varos; Nevesinje; Sarajevo (Novi Grad); Prijedor; Prnjavor; Rogatica; Rudo; Sanski Most; Sokolac; Srebrenica; Teslic; Visegrad; Vlasenica and Zvornik. The extermination, murder and wilful killings of these groups were effected by:

- a) The killing of Bosnian Muslims, Bosnian Croats and other non-Serbs in their towns and villages, during and after the take-over of the territories listed above including those specified in **Schedule A** to this indictment.
- b) The killing of Bosnian Muslims, Bosnian Croats and other non-Serbs in detention facilities and during their deportation or forcible transfers, including those specified in **Schedule B** to this indictment.

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

Count 4: Extermination, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(b) and 7(1) and 7(3) of the Statute of the Tribunal.

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

Count 6: Wilful killing, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(a) and 7(1) and 7(3) of the Statute of the Tribunal.

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

COUNTS 8 to 15

UNLAWFUL CONFINEMENT, IMPRISONMENT, TORTURE, WILFULLY CAUSING GREAT SUFFERING, OTHER INHUMANE ACTS

37. From on or about 1 March 1992 until 31 December 1995, **Slobodan MILOSEVIC**, acting alone or in concert with members of the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the unlawful confinement or imprisonment under inhumane conditions of Bosnian Muslims, Bosnian Croats and other non-Serbs within the territories of Banja Luka; Bihac; Bijeljina; Bileca; Bosanska Dubica; Bosanska Krupa; Bosanski Novi; Bosanski Petrovac; Bosanski Samac; Bratunac; Brcko; Cajnice; Celinac; Doboj; Donji Vakuf; Foca; Gacko; Kljuc; Kalinovik; Kotor Varos; Nevesinje; Prijedor; Prnjavor; Rogatica; Rudo; Sanski Most; Sokolac; Teslic; Visegrad; Vlasenica and Zvornik.

38. Serb military forces, comprised of JNA, VJ, VRS, TO and paramilitary units acting in co-operation with local police staff and local Serb authorities, arrested and detained thousands of Bosnian Muslim, Bosnian Croat and other non-Serb civilians from the territories listed above. These civilians were held in short and long-term detention, of which the major facilities are specified in **Schedule C** to this indictment.

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

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

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

Count 9: Torture, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(f) and 7(1) and 7(3) of the Statute of the Tribunal.

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

Count 11: Unlawful Confinement, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(g) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 12: Torture, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(b) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 13: Wilfully causing great suffering, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(c) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 14: Torture, a **VIOLATIONS OF THE LAWS OR CUSTOMS OF WAR** as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 15: Cruel Treatment, a **VIOLATIONS OF THE LAWS OR CUSTOMS OF WAR** as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 16 to 18 DEPORTATION AND INHUMANE ACTS (FORCIBLE TRANSFERS)

40. From on or about 1 March 1992 until 31 December 1995, **Slobodan MILOSEVIC**, acting alone or in concert with members of the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the unlawful forcible transfer, also qualifying as deportation where indicated hereinafter, of tens of thousands of Bosnian Muslim, Bosnian Croat and other non-Serb civilians from their legal domiciles in the territories of Banja Luka (deportation); Bihac; Bijeljina; Bileca (deportation); Bosanska Dubica; Bosanska Gradiska; Bosanska Krupa; Bosanski Novi; Bosanski Petrovac; Bosanski Samac (deportation); Bratunac; Brcko; Cajnice; Celinac; Doboje; Donji Vakuf; Foca; Gacko (deportation); Sarajevo (Hadzici); Sarajevo (Ilidza); Sarajevo (Ilijas); Kljuc; Kalinovik; Kotor Varos; Nevesinje; Sarajevo (Novi Grad); Sarajevo (Novo Sarajevo); Sarajevo (Pale); Prijedor; Prnjavor; Rogatica; Rudo (deportation); Sanski Most; Sekovici; Sipovo; Sokolac; Srebrenica; Teslic; Trebinje; Sarajevo (Trnovo); Visegrad; Vlasenica; Sarajevo (Vogosca) and Zvornik (deportation), to other areas both

inside and outside Bosnia and Herzegovina. The details of such acts and omissions are described in **Schedule D**.

41. In order to achieve this objective, Serb forces comprised of JNA, VJ, VRS and TO, paramilitary units acting in co-operation with local police staff, local Serb authorities and special forces of the Serbian Ministry of Internal Affairs under the effective control of **Slobodan MILOSEVIC** or other members of the joint criminal enterprise, subjugated villages and towns in Bosnia and Herzegovina and participated with members of the SDS in the disarming of the non-Serb population. The towns and villages, including areas in which the inhabitants complied and offered no resistance, were then attacked. These attacks were intended to compel the non-Serb population to flee. After taking control of the towns and villages, the Serb forces often rounded-up the remaining non-Serb civilian population and forcibly removed them from the area. On other occasions, the Serb forces in co-operation with the local Serb authorities imposed restrictive and discriminatory measures on the non-Serb population and engaged in a campaign of terror designed to drive them out of the territory. The majority of non-Serbs that remained were eventually deported or forcibly transferred from their homes.

By these acts and omissions **Slobodan MILOSEVIC** committed:

Count 16: Deportation, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 17: Inhumane Acts (Forcible Transfers), a **CRIME AGAINST HUMANITY**, punishable under Articles 5(i) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 18: Unlawful Deportation or Transfer, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(g) and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 19 to 22

WANTON DESTRUCTION, PLUNDER OF PUBLIC OR PRIVATE PROPERTY

42. From on or about 1 March 1992 until 31 December 1995, **Slobodan MILOSEVIC**, acting alone or in concert with members of the joint criminal enterprise, planned, instigated, ordered, committed or otherwise aided and abetted the planning, preparation or execution of the wanton destruction and plunder of the public and private property of the Bosnian Muslim, Bosnian Croat and other non-Serb populations within the territories of Banja Luka; Bihac; Bijeljina; Bileca; Bosanska Dubica; Bosanska Gradiska; Bosanska Krupa; Bosanski Novi; Bosanski Petrovac; Bosanski Samac; Bratunac; Brcko; Cajnice; Celinac; Dobo; Donji Vakuf; Foca; Gacko; Sarajevo (Hadzici); Sarajevo (Ilidza); Sarajevo (Ilijas); Kljuc; Kalinovik; Kotor Varos; Nevesinje; Sarajevo (Novi Grad); Sarajevo (Novo Sarajevo); Sarajevo (Pale); Prijedor; Prnjavor; Rogatica; Rudo; Sanski Most; Sekovici; Sipovo; Sokolac; Srebrenica; Teslic; Sarajevo (Trnovo); Trebinje; Visegrad; Vlasenica; Sarajevo (Vogosca), and Zvornik. This intentional and wanton destruction and plunder was not justified by military necessity and included:

- a) The appropriation and plunder of property belonging to Bosnian Muslim, Bosnian Croat and other non-Serb civilians, including the coerced signing of documents relinquishing property rights.
- b) The intentional and wanton destruction of homes and other property owned by

Bosnian Muslim, Bosnian Croat and other non-Serb civilians. Such destruction was employed as a means to compel non-Serbs to flee their legal domiciles and to prevent their subsequent return.

c) The intentional and wanton destruction of religious and cultural buildings of the Bosnian Muslim and Bosnian Croat communities including, but not limited to, mosques, churches, libraries, educational buildings and cultural centres.

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

Count 19: Extensive destruction and appropriation of property, not justified by military necessity and carried out unlawfully and wantonly, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 20: Wanton destruction of villages, or devastation not justified by military necessity, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(b) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 21: Wilful destruction or wilful damage done to historic monuments and institutions dedicated to education or religion, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(d) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 22: Plunder of public or private property, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, punishable under Articles 3(e) and 7(1) and 7(3) of the Statute of the Tribunal.

COUNTS 23 to 29
MURDER, WILFUL KILLING, WILFULLY CAUSING GREAT SUFFERING, CRUEL TREATMENT, ATTACKS ON CIVILIANS

43. Between April 1992 and November 1995, **Slobodan MILOSEVIC**, acting alone or in concert with members of the joint criminal enterprise, planned, instigated, ordered, committed, or otherwise aided and abetted the planning, preparation, or execution of a military campaign of artillery and mortar shelling and sniping onto civilian areas of Sarajevo and upon its civilian population, killing and wounding thousands of civilians of all ages and both sexes.

44. In this time period, the Sarajevo Romanija Corps of the VRS, under the effective control of Radovan KARADZIC and General Ratko MLADIC, launched an extensive, forty-four month shelling and sniping attack on Sarajevo, mostly from positions in the hills surrounding the city with an unobstructed view of Sarajevo.

45. The Sarajevo Romanija Corps conducted a protracted campaign of shelling and sniping upon Sarajevo during which civilians were either specifically targeted or the subject of reckless fire into areas where civilians were known to have been. Among the victims of this campaign were civilians who were, amongst other things, tending vegetable plots, queuing for bread or water, attending funerals, shopping in markets, riding on trams, gathering wood. Specific instances of sniping are described in **Schedule E** attached to this indictment. Specific instances of shelling are set forth in **Schedule F**.

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

Count 23: Murder, a **CRIME AGAINST HUMANITY**, punishable under Articles 5(a) and 7(1) and 7(3) of the Statute of the Tribunal.

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

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

Count 26: Wilfully causing great suffering, a **GRAVE BREACH OF THE GENEVA CONVENTIONS OF 1949**, punishable under Articles 2(c) and 7(1) and 7(3) of the Statute of the Tribunal.

Count 27: Murder, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 28: Cruel treatment, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Common Article 3(1)(a) of the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

Count 29: Attacks on civilians, a **VIOLATION OF THE LAWS OR CUSTOMS OF WAR**, as recognised by Article 51 (2) of Additional Protocol I and Article 13 (2) of Additional Protocol II to the Geneva Conventions of 1949, punishable under Articles 3 and 7(1) and 7(3) of the Statute of the Tribunal.

GENERAL LEGAL ALLEGATIONS

46. All acts and omissions alleged in this indictment occurred on the territory of the former Yugoslavia.

47. At all times relevant to this indictment, a state of international armed conflict and partial occupation existed in Bosnia and Herzegovina.

48. All acts and omissions charged as Grave Breaches of the Geneva Conventions of 1949 occurred during the international armed conflict and partial occupation of Bosnia and Herzegovina. All such acts and omissions were committed against persons protected under the Geneva Conventions.

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

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

51. All conduct charged as Crimes against Humanity was part of a widespread or systematic attack directed against the Bosnian Muslim, Bosnian Croat and other non-Serb civilian populations within

large areas of Bosnia and Herzegovina.

ADDITIONAL FACTS

52. In November 1990, multi-party elections were held in Bosnia and Herzegovina. At the Republic level, the SDA ("*Stranka Demokratske Akcije* - Party of Democratic Action) the party of the Bosnian Muslims won 86 seats; the SDS, the party of the Bosnian Serbs, won 72 seats and the HDZ (*Hrvatska demokratska zajednica* - Croatian Democratic Community) won 44 seats in the Assembly.

53. The central idea within the SDS political platform, as articulated by its leaders, including Radovan KARADZIC, Momcilo KRAJISNIK and Biljana PLAVSIC, was the unification of all Serbs within one state. The SDS regarded the separation of Bosnia and Herzegovina from the SFRY as a threat to the interests of the Serbs.

54. On 5 February 1991 the Assembly of the Republic of Serbia passed a "Law on Ministries" submitted by **Slobodan MILOSEVIC**. This law established twenty "Ministries" of the Serbian government, including the Ministry for Links with Serbs outside Serbia. This Ministry assisted the SDS to establish the Serb Republic of Bosnia and Herzegovina.

55. The results of the November 1990 elections meant that, as time went on, the SDS would be unable through peaceful means to keep the Republic of Bosnia and Herzegovina in what was becoming a Serb-dominated Yugoslavia. As a result, Serb people within certain areas of Bosnia and Herzegovina, with Serb majorities, began to organise themselves into formal regional structures that they referred to as "Associations of Municipalities." In April 1991 the Association of Municipalities of Bosnian Krajina, centred in Banja Luka, was formed.

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

57. On 25 March 1991, **Slobodan MILOSEVIC** and Franjo TUDMAN met in Karadjordjevo and discussed the partition of Bosnia and Herzegovina between Serbia and Croatia.

58. On 25 June 1991, Slovenia and Croatia declared their independence. On 26 June, the JNA intervened in Slovenia. In the summer of 1991, fighting broke out in Croatia.

59. In August 1991 Radovan KARADZIC instituted a system of secret communication between the local boards of the SDS and the Main Staff and with the Republic of Serbia. This secret communication protocol was declared mandatory for the transmission of reports and orders.

60. From autumn 1991, the JNA began to withdraw its forces out of Croatia. Forces under the control of the JNA began to re-deploy in Bosnia and Herzegovina. Many of these troops were deployed to areas in which there was no garrison or other JNA facility.

61. As the war continued in Croatia it appeared increasingly likely that Bosnia and Herzegovina

would also declare its independence from the SFRY. The SDS, realising it could not prevent the secession of Bosnia and Herzegovina from the SFRY, began the creation of a separate Serbian entity within Bosnia and Herzegovina. During the period from September to November 1991, several Serbian Autonomous Regions (SAO) were formed, some of them on the basis of the Associations of Municipalities referred to above.

62. On 12 September 1991, the Serbian Autonomous Region of Herzegovina was proclaimed. On 16 September 1991, the Autonomous Region of Krajina was proclaimed by the Assembly of the Association of Municipalities of Bosnian Krajina. By 21 November 1991, the Serbian Autonomous Regions and Autonomous Regions consisted of the Autonomous Region of Krajina, the SAO Herzegovina, the SAO Romanija-Birac, the SAO Semberija, and SAO Northern Bosnia.

63. On 3 October 1991, the four members of the SFRY Presidency from Serbia and Montenegro (Borisav JOVIC, Jugoslav KOSTIC, Sejdo BAJRAMOVIC and Branko KOSTIC) assumed the function of the SFRY Presidency, circumventing the roles and responsibilities of the Presidency members from Slovenia, Croatia, Bosnia and Herzegovina and Macedonia.

64. On 15 October 1991, at the meeting of the SDS Party Council the decision was reached to form a separate assembly, entitled the "Assembly of the Serbian People of Bosnia and Herzegovina" to secure Serb interests.

65. On or around 22 October 1991, **Slobodan MILOSEVIC**, together with other members of the joint criminal enterprise, continued to advocate for a unitary Serb state governed from Belgrade, Serbia. On the same date the "Rump Presidency" called for the mobilisation of reservists in Serbia and "other regions that want to stay in Yugoslavia."

66. On or about 26 October 1991, Radovan KARADZIC declared a full mobilisation of the TO and the formation of field units in the Serb Republic of Bosnia and Herzegovina.

67. On 24 October 1991, the Assembly of the Serbian People in Bosnia and Herzegovina, dominated by the SDS, decided to conduct a "Plebiscite of the Serbian People in Bosnia and Herzegovina" in order to decide whether to stay in the common state of Yugoslavia with Serbia, Montenegro, the Serbian Autonomous Region of Krajina, SAO Western Slavonia and SAO Eastern Slavonia, Baranja and Western Srem.

68. On 9 and 10 November 1991, the Bosnian Serbs held the plebiscite on the issue of whether Bosnia and Herzegovina should stay in Yugoslavia or become an independent state. The results overwhelmingly showed that the Bosnian Serbs wanted to stay in Yugoslavia.

69. On 21 November 1991, the Assembly of the Serbian People of Bosnia and Herzegovina, proclaimed as part of the territory of the federal Yugoslav state all those municipalities, local communities and populated places, in which over 50% of the people of Serbian nationality had voted, during the plebiscite, to remain in that state as well as those places where citizens of other nationalities had expressed themselves in favour of remaining in Yugoslavia.

70. On 11 December 1991, the Assembly of the Serbian People delivered a detailed request to the JNA to protect with all available means as "integral parts of the State of Yugoslavia" the territories of Bosnia and Herzegovina in which the plebiscite of the Serbian people and other citizens on remaining in a joint Yugoslav state had been conducted.

71. On 19 December 1991, the SDS issued instructions for the "Organisation and Activity of the Organs of the Serbian People in Bosnia and Herzegovina in Extraordinary Circumstances" which provided a plan for the SDS take-over of municipalities in Bosnia and Herzegovina.

72. On 9 January 1992, the Assembly of the Serbian People of Bosnia and Herzegovina adopted a declaration on the Proclamation of the Serbian Republic of Bosnia and Herzegovina. The territory of that republic was declared to include "the territories of the Serbian Autonomous Regions and Districts and of other Serbian ethnic entities in Bosnia and Herzegovina, including the regions in which the Serbian people remained in the minority due to the genocide conducted against it in World War Two", and it was declared to be a part of the federal Yugoslav state. On 12 August 1992, the name of the Bosnian Serb Republic was changed to Republika Srpska.

73. From 29 February to 2 March 1992, Bosnia and Herzegovina held a referendum on independence. At the urging of the SDS, the majority of Bosnian Serbs boycotted the vote. The referendum resulted in a pro-independence majority.

74. On 18 March 1992, during the 11th session of the Assembly of the Serbian People, a conclusion was reached to "prepare for the next session proposals for the take-over of power in the Republic of Serbian People of Bosnia and Herzegovina."

75. From March 1992 onwards, Serb regular and irregular forces seized control of territories within Bosnia and Herzegovina, including those specified in this indictment.

76. On 6 April 1992, the United States and the European Community formally recognized the independence of Bosnia and Herzegovina.

77. On 27 April 1992, Serbia and Montenegro proclaimed a new Federal Republic of Yugoslavia and declared it the successor state of the Socialist Federal Republic of Yugoslavia.

78. On 12 May 1992, at the 16th Assembly of the Serbian People in Bosnia and Herzegovina, Radovan KARADZIC announced the six strategic objectives of the Serbian People in Bosnia and Herzegovina. These objectives included the eradication of the Drina River as a border between the Serbian states. During the same session, General Ratko MLADIC told the Assembly that it would not be possible to separate Serbs from non-Serbs and have the non-Serbs simply leave the territory. He warned that attempting this process would amount to genocide.

79. On 15 May 1992, the United Nations Security Council in its resolution number 752 demanded that all interference from outside Bosnia and Herzegovina by units of the JNA cease immediately and that those units either be withdrawn, be subjected to the authority of the Government of the Republic, or be disbanded and disarmed.

Carla Del Ponte
Prosecutor

Dated this 22nd day of November 2001

Schedule A
Killings not Associated with Detention Facilities

No	Municipality	Victims (Killed)	Date
1	Banja Luka	In Culum-Kostic, 5 non-Serbs were killed.	15-Aug-92
2	Bihac	In Orasce and Duljci, approximately 18 non-Serbs were killed.	20-22 Sep 92
3	Bijeljina	In Bijeljina, at least 48 Bosnian Muslim and/or Bosnian Croat men, women and children were killed.	1-2 Apr 92
4	Bosanska Gradiska	Killing of at least 4 Bosnian Muslim civilians near the market place in Bosanska Gradiska.	15-Aug-92
5	Bosanski Novi	In Blagaj Japra, 7 Bosnian Muslim men were killed during the expulsion of Bosnian Muslims.	09-Jun-92
		In Alici, 27 Bosnian Muslim men were killed.	23-Jun-92
6	Bosanski Petrovac	Killing of at least 2 Bosnian Muslims near Hujici.	20-Sept-92
7	Bratunac	In Glogova, approximately 65 Bosnian Muslim and Bosnian Croat civilians killed by members of the JNA, acting together with Serb paramilitary forces.	09-May-92
8	Brcko	In Brcko, approximately 12 Bosnian Muslim males and other non-Serbs were killed at the Hotel Posavina.	04-May-92
9	Celinac	Rifet MUJKANOVIC, shot to death by Serb soldier.	31-July-92,
		Killing of 2 non-Serb civilians by Serb soldiers.	2-Aug-92,

10	Doboj	In Gornja Grapska, approximately 34 Bosnian Muslim civilians were killed during shelling of village.	10-May-92
11	Foca	In DDjidjevo, at least 11 Bosnian Muslim men were executed by Serb soldiers.	20-Apr-92
		In Filipovici, at least 5 Bosnian Muslims were killed by Serb soldiers in a military warehouse.	26-Apr-92
		In Jelec, 18 Bosnian Muslims, including elderly people and 8 members of one family, were executed by JNA soldiers.	4-10-May-92
		In Brod, 14 Bosnian Muslim men from Trnovaca were executed by Serb soldiers.	22-Jun-92
12	Gacko	At least 5 non-Serbs killed in the village of Meduljici	17-June-92
		2 Muslim males killed by Serbs in a field near Mount Zelengora	18-June92
		At least 8 Muslims killed by Serb soldiers near Mount Zelengora	18-23-June-92
13	Kljuc	In Pudin Han, 11 Bosnian non-Serb civilians were killed during the Serb attack on the village.	27-May-92
		In Prhovo, 38 Bosnian Muslim villagers, including women and children, were killed by shooting and grenades.	01-Jun-92
		Near Peci, 9 Bosnian Muslim men were killed by Serb soldiers.	01-Jun-92
		In Velagici, approximately 100 Bosnian Muslim men were killed.	01-Jun-92
14	Kotor Varos	In Kotor Varos town, approximately 13 non-Serbs were killed in and around the Medical Centre.	25-Jun-92
		In a barn in Dabovci, at least 15 Bosnian Muslim men were killed.	Aug-92
		In Vrbanjci 7 Bosnian Muslim men were killed in and around the Alagic café.	25-Jun-92

		In Grabovice, a large number of Bosnian Muslim and Bosnian Croat detainees were held in the Grabovice School, beaten and never seen again.	Nov-92
15	Nevesinje	At or near Lipovaca and Dubrovaci, at least 34 Bosnian Muslim men, women and children were killed.	Jun-Jul-92
		Near Kiser, approximately 17 Bosnian Muslim civilians were killed by Serb soldiers.	mid July-92
16	Prijedor	In the Brdo region numerous non-Serbs were killed.	Jul-92
		In Hambarine and Behlici, at least 3 Bosnian Muslims were killed.	11-Jun-1-Jul-92
		In Kamicani, approximately 8 non-Serbs were killed in Mehmed Sahoric's house.	26-May-92
		In Jaskic, at least 19 Bosnian Muslim men were killed.	14-Jun-92
		In Biscani, about 40 non-Serbs were killed.	20-Jul-92
		In Carakovo, at least 19 Bosnian Muslims were killed.	23-Jul-92
		In Brisevo, at least 68 non-Serbs were killed during the attack.	24-Jul-92
		In Kipe iron ore mine (near Ljubija), at least 8 Bosnian Muslim men were executed.	25-Jul-92
		In Ljubija, at least 3 Bosnian Muslim men were executed at the football stadium.	25-Jul-92
		In Tomasica, 4 non-Serbs were killed.	03-Dec-92
17	Prnjavor	In Kremna, 8 Bosnian Muslim civilians from Derventa were killed.	Apr-92
		In Lisnja, 4 Bosnian Muslim men were executed.	May-92

18	Rudo	At least 50 non-Serb civilians killed during the take over in mass executions at Setovo, Vranj, Mrsovo and massacres in Srpci and Sjeverin.	May-92
		Approximately 40 elderly non-Serb civilians killed.	May-92
		A number of Muslims killed on the hill of Vranja.	02-Aug-92
19	Sanski Most	In Hrustovo, at least 24 Bosnian Muslim women and children were killed.	31-May-92
		On or near Vrhpolje bridge, at least 13 Bosnian Muslim men from Begici were killed.	31-May-92
		In Sanski Most, a number of non-Serbs were killed near the Partisan cemetery.	22-Jun-92
		In Kenjari, 19 Bosnian Muslim men were killed in Dujo Banovic's house.	27-Jun-92
		In Budin, 12 members of one family were killed.	01-Aug-92
		In Donji Kruhari near Skrljevita, 5 Bosnian Croat men were killed.	02-Nov-92
		In Trnova near Sanski Most town, approximately 11 non-Serb men were executed by members of Arkan's Tigers.	20-Sep-95
		In Sasina, at least 65 non-Serb men were executed by members of Arkan's Tigers under the direct command of Arkan.	21-Sep-95
20	Sokolac	Approximately 7 non-Serb villagers killed by Serbs in massacre at Tocionik village.	21-Jul-92
		In the village of Meljine, 3 elderly non-Serb women killed.	31-Jul-92
		In the village of Zulj, two non-Serbs killed.	01-Aug-92

21	Srebrenica	Following the take-over of Srebrenica, several thousand Bosnian Muslim men were executed by Bosnian Serb forces, including at the following locations:	Jul-95
		1) Cerska Valley, approximately 150 Bosnian Muslim men;	13-Jul-95
		2) Kravica warehouse (Zvornik Municipality), approximately 1,000 Bosnian Muslim men;	13-Jul-95
		3) Orahovac (Zvornik Municipality), approximately 1,000 Bosnian Muslim men;	14-Jul-95
		4) Petkovci Dam (Zvornik Municipality), approximately 1,500 - 2,000 Bosnian Muslim men;	14/15-Jul-95
		5) Branjevo Military Farm (Zvornik Municipality), approximately 1,000 - 1,200 Bosnian Muslim men;	16-Jul-95
		6) Pilica Cultural Dom (Zvornik Municipality), approximately 500 Bosnian Muslim men;	16-Jul-95
		7) Kozluk (Zvornik Municipality), at least 340 Bosnian Muslim men.	15/16-Jul-95
22	Visegrad	Near Vidova Gora, at least 11 non-Serbs, including women and children, were executed and thrown into the Drina.	Jun-92
		In Nova Mahala (Visegrad town), over 60 Bosnian Muslim and/or Bosnian Croat civilians from Koritnik were burnt to death in a house ignited by Serb paramilitaries led by Milan Lukic.	14-Jun-92
		In Bikavac settlement, approximately 70 Bosnian Muslim and other non-Serb civilians were burnt to death in a house ignited by Serb paramilitaries led by Milan Lukic.	27-Jun-92
23	Vlasenica	In Drum (Vlasenica town), approximately 22 Bosnian Muslim men were killed.	Jun-92

		In Zaklopaca, at least 58 Bosnian Muslim men, women and children were executed during the Serb attack on the village.	16-May-92
24	Zvornik	In Zvornik town, 15 Bosnian Muslim and Bosnian Croat males were executed by Arkan's soldiers.	09-Apr-92
		In Drinjaca, at least 55 Bosnian Muslim men were killed.	30-May-92
25	Ilijas (Greater Sarajevo)	In Ljesevo, 21 Bosnian Muslims were killed.	04-Jun-92

**Schedule B
Killings Associated with Detention Facilities**

No	Municipality	Victims (Killed)	Date
1	Banja Luka	In Manjaca camp, 2 non-Serb men were killed.	6-Jun-18-Sep-92
		At Manjaca camp, approximately 7 non-Serbs were killed after being transported from Hasan Kikic Sports Hall in Sanski Most.	03- or 04-Jun-92
		Between Krings camp and Manjaca camp, approximately 20 non-Serb men were killed during transportation between the camps.	04-Jul-92
		At Manjaca camp, at least 8 non-Serb men were killed in front of camp after their transportation from Omarska camp	06-Aug-92
2	Bileca	In SUP Detention facility, 2 non-Serb detainees killed.	25-Jun - 18 Dec-92
3	Bosanska Krupa	In Petar Kocic Elementary School, approximately 11 non-Serb detainees were killed.	1-10-Aug-92
4	Bosanski Samac	In Crkvina camp, approximately 17 non-Serb detainees were killed.	06-May-92
5	Bratunac	In Vuk Karadzic school, at least 14 non-Serb men were killed.	10-16-May-92
6	Breko	In Luka Camp, approximately 30-35 Bosnian Muslim detainees were executed.	11-16-May-92

7	Cajnice	At Mostina Hunting Lodge, 53 non-Serbs killed.	19-May-92
8	Foca	In Livade camp, a number of non-Serb detainees were killed.	13-18-Apr-92
		At KP Dom prison, at least 266 Bosnian Muslim detainees were killed.	Jun-Dec-92
9	Gacko	5 Bosnian men killed in the SUP building in Gacko.	3-Jul-92
10	Kalinovik	Approximately 23 Muslim men and boys from the Gunpowder warehouse shot in a field near Ratine.	05-Aug-92
11	Kljuc	In Biljani, at least 30 elderly Muslim men were killed.	10-Jul-92
12	Prijedor	In Trnopolje camp, at least 2 non-Serbs were killed.	28-May-Oct-92
		In Omarska camp, hundreds of Bosnian Muslims and Bosnian Croats were killed.	May-Aug-92
		In Keraterm camp, approximately 150 non-Serbs were killed.	24-Jul-92
		On Vlasic mountain in Skender Vakuf municipality, approximately 200 Bosnian Muslim and/or Bosnian Croat males from Trnopolje camp were killed.	21-Aug-92
13	Rogatica	Near Crvenka, at least 10 Bosnian Muslim males from Visegrad were executed.	15-Jun-92
14	Rudo	At least one elderly Muslim man killed in detention facility in JNA barracks in Rudo.	In or around 1992
		At least one Muslim man killed in the detention camp in the JNA barracks.	In or around 1992
15	Sanski Most	Near Hrastova Glavica, approximately 100 non-Serb men taken from Keraterm and Omarska camps were killed.	05-Aug-92
		In Sanski Most town, at least 2 non-Serb men were killed in the Hotel Sana by Arkan's Tigers.	18-21-Sep-92
		At Sanakeram ceramics factory, at least 10 non-Serb men were killed.	30-Sep-09-Oct-92
16	Sokolac	In village of Novoseoci, approximately 44 non-Serb men were detained and killed.	22-Sep-92

17	Teslic	In Teslic town, at least 5 non-Serb men were killed at the Territorial Defence building.	Jun-92
		In Pribinic camp, at least 7 or 8 non-Serb detainees were killed.	Jun-Oct-92
18	Vlasenica	At Susica camp, at least 6 non-Serb male detainees were killed.	21-23-Jun-92
19	Zvornik	At Ekonomija farm, Karakaj, approximately 6 non-Serb detainees were killed.	12-14-May-92
		At Novi Izvor building, at least 2 non-Serb male detainees were killed.	May-92
		At Celopek Dom Kulture, at least 30 non-Serb male detainees were killed.	9-Jun-26-Jun-92
		At Karakaj Technical School, approximately 110 Bosnian Muslim males were killed.	1-3-Jun-92
		At Gero's slaughter-house, approximately 190 non-Serb detainees were killed.	07-Jun-92
20	Novi Grad (Sarajevo)	Near Srednje, 47 Bosnian Muslim men from Rajlovac camp were killed.	14-Jun-92

**Schedule C
Detention Facilities**

No	Municipality	Detention Camp	Dates
1	Banja Luka	Former JNA Barracks Mali Logor (Military Remand Prison)	Aug-Sep-92
		Viz Tunjice Penitentiary	Jun-Nov 92
		Manjaca Camp	Jun-Dec-92
2	Bihac	Traktorski Servis, Ripac (garages and houses)	Jul-Oct-92
3	Bijeljina	Batkovici Detention Centre	Jul-92-Jun-95
		New Slaughterhouse (Nova Klaonica)	From Mar 92
4	Bileca	SUP Detention facility.	10 June- 19 Dec 1992
		Student Hostel (Dacki Dom).	25 June - 5 Oct 1992

5	Bosanska Dubica	SUP Building	Jun-Sep 92
6	Bosanska Krupa	Petar Kocic Elementary School	Apr-Sep-92
		Jesenica Primary School	Apr-Sep-92
7	Bosanski Samac	Crkvina Camp	May - Oct 92
8	Bosanski Novi	Bosanska Kostajnica Police Station	May-Jul-92
		Mlakve Football Stadium	Jun-Jul-92
		Bosanski Novi Fire Station	Jul-Aug 92
9	Bosanski Petrovac	Kozila Camp	May-Aug 92
10	Brcko	JNA Barracks Brcko	Apr-Jul 92
		Luka Detention Centre	04-May-13-Jul-92
11	Bratunac	Vuk Karadzic School	Jul-92
12	Cajnice	Mostina Hunting Lodge	April, May 1992
		Cajnice SUP building.	June-July 1993
13	Celinac	Municipal building in Celinac	1-Aug-92
14	Doboj	Spreca Prison	Apr 92-Feb 93
		Percin's Disco (restaurant Kod Perco)	May - Aug-92
		Ammunition Warehouse, Bare	May-92
		SUP Station	May-Aug 92
		JNA Hangars near Bosanska Plantation (Bosanka Camp)	May-92-Jun-93
		Seslija Camp	Mar-Oct-93

15	Donji Vakuf	Vrbas Promet camp.	11-June-92
		"The House," a house across the street from the MUP building	07-June-92
		SUP building	16-June-92
		TO warehouse.	16-June-92
16	Foca	Foca High School (Sredsnjoskola Centar)	Jun-92
		Partisan Sports Hall	Jul-92
		Livade Camp	Apr-92
		KP Dom Prison	Apr-92 - Oct-94
17	Gacko	Dom Kulture Avtovac.	01-June-92
		SUP building	08-June 92 - 05-July-92
		Hotel connected to power plant	01-May-92
		Hotel "Metohija"	01-May-92
18	Kalinovik	Kalinovik School (primary/elementary).	Jul 92- Sept 92
		Gunpowder warehouse between Jelasica and JazicI.	5 July-5-Aug-92
19	Kljuc	Nikola Mackic Elementary School	May-92
20	Kotor Varos	Kotor Varos Prison	Jun - Nov-92
		Kotor Varos Sawmill	Jun-92
		Kotor Varos Police Station	May-Sep 92
		Kotor Varos Elementary School	Aug-Sep 92
21	Nevesinje	Central Heating Factory (Kilavci)	Jun-Jul 92
22	Prijedor	Omarska Camp	May - Aug-92
		Keraterm Camp	May-Aug-92

		Miska Glava	Jul-92
		Prijedor Barracks	May-Jun 92
		Trnopolje Camp	May-Dec-92
23	Prnjavor	Stari Mlin	Oct-92 - Mar-94
		Sloga Shoe Factory	May-Dec 92
		Ribnjak	Nov-92-Jan- 93
24	Rogatica	Veljko Vlahovic School	May-92 - Early-93
		Rasadnik	Jun-92 - Jun- 93
25	Rudo	Basement of the cultural centre.	June-93 - Feb -94
26	Sanski Most	Krings Factory	May-Aug-92
		Hasan Kikic School	May - Jun- 92
		Betonirka Cement Factory	May -Jul-92
		Boiler Room of Old Hotel.	21-Sep-95 to 25-Sep-95
27	Sokolac	KTK Leather Factory.	July- Dece 92
		"Slavisa Vajner Cica Elementary School.	
		Planja's house.	
		Cavarine.	
28	Teslic	Pribinic (old post office)	Jun-Oct 92
		TO Building	Jun-92
		SUP Building	Jun-92

29	Visegrad	Detention centre in tourist hotel in Vilina Vlas.	01-Ma-92
		Uzamnica, a former military warehouse and barracks.	Aug-92 - Oct-94
30	Vlasenica	Susica Territorial Defence Installation	Jun-92
31	Zvornik	Celopek Dom Kulture	May-Jul 92
		Karakaj Technical School	May-Jul 92
		Novi Izvor Building, Zvornik town	Apr-Sep-92
		Ekonomija Farm, Karakaj	Jun-Aug 92

**Schedule D
Forcible Transfers**

No	Municipality	Non-Serb Displaced Persons and Refugees	Deportations
TOTAL NUMBER EXPELLED - 268,050			
1	Banja Luka	19359	Hungary
2	Bileca	993	Montenegro
3	Bihac	2588	
4	Bijeljina	13159	
5	Bosanska Krupa:		
	- <i>Bosanska Krupa</i>	1439	
	- <i>Buzim</i>	389	
	- <i>Krupa na Uni</i>	1	
6	Bosanska Dubica	3310	
7	Bosanska Gradiska	7516	
8	Bosanski Novi	6288	
9	Bosanski Petrovac:		

	- <i>Bosanski Petrovac</i>	778	
	- <i>Petrovac</i>	unknown	
10	Bosanski Samac:		Croatia
	- <i>Samac</i>	1563	
	- <i>Domaljevac-Samac</i>	217	
11	Bratunac	8048	
12	Brcko:		
	- <i>Brcko</i>	14607	
	- <i>Ravne / Rahic</i>	1532	
13	Cajnice	2214	
14	Celinac	608	
15	Doboj:		
	- <i>Doboj</i>	18569	
	- <i>Doboj Istok</i>	405	
	- <i>Doboj Jug</i>	310	
16	Donji Vakuf	1729	
17	Foca:		
	- <i>Foca / Srbinje</i>	8258	
	- <i>Foca FBiH</i>	1039	
18	Gacko	1899	Macedonia
19	Gorazde:		
	- <i>Gorazde FBiH</i>	2563	
	- <i>Srpsko Gorazde</i>	1834	
20	Kalinovik	612	

21	Kljuc:		
	- <i>Kljuc</i>	3852	
	- <i>Kljuc / Ribnik</i>	26	
22	Kotor Varos	6870	
23	Nevesinje	1483	
24	Prijedor	20256	
25	Prnjavor	3490	
26	Rogatica	6650	
27	Rudo	1614	Macedonia
28	Sanski Most:		
	- <i>Sanski Most</i>	6257	
	- <i>Srpski Sanski Most</i>	221	
29	Srebrenica	25,000	
30	Sekovici	162	
31	Sipovo	1427	
32	Sokolac	2670	
33	Teslic	7789	
34	Trebinje:		
	- <i>Trebinje</i>	3116	
	- <i>Ravno</i>	201	
35	Visegrad	6690	
36	Vlasenica	6942	
37	Zvornik:		Hungary;Austria
	- <i>Zvornik</i>	15436	
	- <i>Sapna</i>	1335	

CITY OF SARAJEVO			
38	Ilidza:		
	- <i>Ilidza</i>	218	
	- <i>Srpska Ilidza</i>	60	
39	Novi Grad Sarajevo	9008	
40	Novo Sarajevo:		
	- <i>Novo Sarajevo</i>	7097	
	- <i>Srpsko Novo Sarajevo</i>	4	
41	Vogosca	2099	
GREATER SARAJEVO			
42	Hadzici	1390	
43	Ilijas	1889	
44	Pale:		
	- <i>Pale</i>	1697	
	- <i>Pale FBiH</i>	115	
45	Trnovo:		
	- <i>Trnovo RS</i>	744	
	- <i>Trnovo FBiH</i>	415	

**Schedule E
Sarajevo Sniping Incidents**

No	Incident	Date
1	Fadila ZGODIC, a woman aged 52 years, was shot and wounded in the hip while carrying bread near Darovalaca Krvi Street, presently Kolodvorska Street, in the area of Novo Sarajevo.	07- Nov- 92

2	Anisa PITA, a girl aged 3 years, was shot and wounded in the right leg as she was taking off her shoes while on the porch of her residence on Zagrici Street in the Sirokaca area of Sarajevo.	13-Dec-92
3	The victim, a girl aged 9 years, was shot and wounded in the back as she played in the front garden of her house in the Sedrenik area of Sarajevo.	17-Apr-93
4	Muhamed HAZNADAREVIC, a man aged 52 years, was shot and wounded in the back and chest while trying to tend a vegetable plot in Slatinski Put 5, presently Slatinski Put 13, Kobilja Glava, north of Sarajevo.	25-Jun-93
5	Almasa KONJHODZIC, a woman aged 56 years, was shot dead near the junction of Dure Dakovica and Kranjcevica Street, presently Alipasina and Kranjcevica, while walking with her family.	27-Jun-93
6	Munira ZAMETICA, a woman aged 48 years, was shot dead while collecting water from the Dobrinja River in area of Dobrinja II and III.	11-Jul-93
7	Hajrija DIZDAREVIC, a woman aged 66 years, was shot dead in her apartment at Kranjcevica 11/5, presently Dzamijska Street, during her prayers.	On or about 17-07-1993
8	Mejra JUSOVIC, a woman aged 45 years, was shot and wounded while pulling a load of wood towards her home near Rasadnjak, Sedrenik area, Sarajevo.	24-Jul-93
9	Vildana KAPUR, a woman aged 21 years, was shot and wounded in the leg while transporting water home along Stara cesta, Hotonj area.	05-Aug-93
10	Nafa TARIC, a woman aged 35 years, and her daughter Elma TARIC, aged 8 years, were shot by a single bullet while walking together in Ivana Krndelja Street, in the centre of Sarajevo. The bullet wounded the mother in the left thigh and wounded the daughter on the hand and in the abdomen.	03-Sep-93
11	Sacir BOSNIC, a man aged 56 years, was shot dead while gathering wood across the road from the Hambina Carina Reservoir and adjacent to Zelengorska Street, presently Hambina Carina Street, at Sirokaca, Skenderija.	07-Sep-93
12	Edina TRTO, a woman aged 25 years, was shot dead while walking in front of Ivana Krndelja Street 6, presently Azize Sacerbegovic 12, Sarajevo.	26-Sep-93

13	Faruk KADRIC, a boy aged 16 years, was shot and wounded in the neck while riding as a passenger in his father's truck along Ante Babica Street, in the west end of Sarajevo.	04- Oct-93
14	Edin RAMOVIC, a man aged 29 years, was shot and wounded in the left upper arm while walking in Stara cesta Road, in the Bare area of Sarajevo.	07- Oct-93
15	Ramiz VELIC and Milan RISTIC, aged 50 and 56 years respectively, were wounded by a burst of gunfire while they were working clearing rubbish along Brace Ribara Street, presently Porodice Ribar Street, in the Hrasno area of Sarajevo.	02- Nov- 93
16	Ramiza KUNDO, a woman aged 38 years, was shot and wounded in the left leg while she and another woman were returning from a water well carrying buckets of water near Brijesko Brdo Street, presently Bulbulistan Street, in the west end of Sarajevo.	02- Nov- 93
17	Fatima OSMANOVIC, a woman aged 44 years, was shot and wounded in the right side of her face while she was carrying water in Brijesko brdo Street, presently Bulbulistan Street, in the west end of Sarajevo.	13- Nov- 93
18	Sanija DZEVLAN, a woman aged 32 years, was shot and wounded while riding a bicycle across a bridge in Nikola Demonja Street, Dobrinja.	06- Jan-94
19	Edin HUSOVIC, a man aged 17 years, was shot and wounded in the abdomen while standing outside a pizza restaurant Seste Proleterske Brigade Street, presently Bulevar Mese Selimovica.	10- Jan-94
20	Hetema MUKANOVIC, a woman aged 38 years, was shot and killed in her apartment on the first floor of Obala 27. Jula 89/I, presently Aleja Lipa 64, in the Hrasno area of Sarajevo. At the time she was sitting with her husband and neighbours, drinking coffee by candlelight.	11- Jan-94
21	Ivan FRANJIC, a man aged 63 years, was walking with two others on Ante Babica Street in Vojnicko Polje, in the west end of Sarajevo. He was shot and wounded in the stomach while one of his companions Augustin VUCIC was shot and later died from his injuries.	13- Mar- 94

22	Sadeta PLIVAC, a woman aged 53 years and Hajra HAFIZOVIC a woman aged 62 years, were both shot and wounded in their legs while passengers in a crowded bus near the junction of Nikolje Demonje and Bulevar AVNOJ, presently Nikolje Demonje and Bulevar Branioca Dobrinja, in Dobrinja.	25-May-94
23	Fatima SALCIN, a woman aged 44 years, was shot and wounded in the hand when walking with her father-in-law in Ive Andrica Street, in the Mojnilo area of Sarajevo.	13-Jun-94
24	Sanela MURATOVIC, a girl aged 16 years, was shot and wounded in the right shoulder while walking with a girlfriend in Dure Jaksica Street, presently Adija Mulabegovica, in the west end of Sarajevo.	26-Jun-94
25	Jasmina KUCINAR, a pregnant woman aged 31 years, and her son Damir KUCINAR, aged 4 years, were lightly wounded in the legs by a shot penetrating a crowded tram in which they were travelling. The tram was travelling west on Zmaja od Bosne Street towards Alipasino Polje. Mensur JUSIC, a man aged 36 years, sustained a slight leg wound and Belma SUKIC nee LIKIC, a woman aged 23 years, was wounded in the left armpit in the same attack. The tram was near the Holiday Inn hotel at the time of the incident.	6-10-Jul-94
26	Rasid DZONKO, a man aged 67 years, was shot and wounded in the back whilst sitting watching television in his apartment situated at Milanka Vitomira Street, presently Senada Mandica Dende Street 5 in Vojnicko Polje, in the west end of Sarajevo.	17-Jul-94
27	Seid SOLAK, a boy aged 13 years, shot and wounded in the abdomen whilst window shopping with his mother and sister in Miljenka Cvitkovic Street, presently Ferde Hauptmana, in the Cengic Vila area of Sarajevo.	22-Jul-94
28	Alma CUTUNA, a woman aged 43 years, was wounded in the right upper leg while travelling on a tram on Zmaj od Bosne Street in Sarajevo.	08-Oct-94
29	Adnan KASAPOVIC, a boy aged 16 years, was shot in the chest and killed while walking in an alley adjoining Dordje Andrijevic Kuna Street.	24-Oct-94
30	Fata GUTA, a woman aged 59 years, was shot and wounded in the hand while she was going with jerri-cans to collect water from the Moscanica spring in Gazin Han, to the east of Sarajevo.	08-Nov-94

31	Sanja SMJECANIN, a pregnant woman aged 28 years, was shot and wounded while travelling with her husband and sister-in-law in a car on Zmaj od Bosne Street.	09-Nov-94
32	Dzenana SOKOLOVIC, a woman aged 31 years, and her son Nermin DIVOVIC, a boy aged 7 years, were fired on while walking in Zmaj od Bosne Street. Ms. SOKOLOVIC was wounded with a bullet in the abdomen. The bullet passed through her and hit her son in the head, killing him. They had been walking home from Hrasno, where they had gone to collect firewood the previous day.	18-Nov-94
33	Hajrudin HAMIDIC, a man aged 52 years, was wounded in the arm and face when the tram he was driving westbound on Zmaj od Bosne was fired on.	21-Nov-94
34	Sanela DEDOVIC, a girl aged 12 years, was wounded in the left ankle while she was walking to school. The incident occurred at the junction of Sedrenik Street and Red'epa Gorusanovica Street, in the north east corner of Sarajevo.	22-Nov-94
35	Hafiza KARACIC, a woman aged 31 years and Sabina SABANIC, a woman aged 26 years, were both wounded in the right shoulder when the tram they were travelling on came under fire on Zmaj od Bosne, between the Technical School and Marshal Tito Barracks.	23-Nov-94
36	Lejla BAJRAMOVIC, a woman aged 24 years, was sitting in a friend's apartment in Franca Lehara Street, near the centre of Sarajevo, when she was shot in the head and killed. The shot came through the apartment window.	08-Dec-94
37	Dervisa SELMANOVIC, a woman aged 49 years, was shot and wounded in the right knee while she was gathering firewood in the backyard of a house in Sedrenik Street, in the north east end of Sarajevo.	10-Dec-94
38	Malkan PLEHO, a man aged 62 years, was shot and wounded in the right lower leg while climbing the front steps to his house in Sedrenik, in the north east end of Sarajevo.	11-Dec-94
39	Halid DEMIROVIC, a man aged 62 years, was shot and wounded in the right heel while he was gathering firewood on Pasino Brdo, in the north east corner of Sarajevo.	13-Dec-94
40	Senad KESMER, a man aged 31 years, Alma CEHAGIC, a woman aged 19 years, Alija HOLJAN, a man aged 55 years, and others, were shot and wounded while travelling in a westbound tram on Zmaj od Bosne Street. The tram was near the Tito Barracks at the time.	27-Feb-95

41	Azem AGOVIC, a man aged 46 years and Alen GICEVIC, a man aged 33 years, were shot and wounded while travelling in an eastbound tram on Zmaj od Bosne Street. The tram was near the Holiday Inn at the time.	03-Mar-95
42	Tarik ZUNIC, a boy aged 14 years, wounded in the hand while he was walking home from school at Sedrenik Street, in the north east of Sarajevo. He emerged from behind a protective screen, about 100 metres from home, when he was hit.	06-Mar-95
43	Vahid BALTA, a man aged 52 years, was walking with his wife in Sedrenik Street, in the north east of Sarajevo, when he was shot in the ankle.	06-Mar-95
44	A young man was crossing the junction of Nikole Demonje and Bulevar Avnoaj Streets in the Dobrinja area, when he was shot in the left side and killed.	18-Mar-95
45	Semsa COVRK, a woman aged 27 years, was shot and wounded in the abdomen while walking in Josipa Krasa Street, Novi Grad, holding her young son's hand at the time.	03-May-95
46	A man was shot and killed in Dinarska Street, Hrasno Brdo.	13-May-95
47	Durgut COBIC, a man aged 80 years, was shot and wounded in the shoulder when he opened the balcony of his apartment door Kunovska Street 4/I, Dobrinja.	25-May-95

Schedule F
Sarajevo: Shelling Incidents

No	Incident	Date
1	Two shells were fired upon a crowd of approximately 200 persons who were watching and participating in a football game in a parking lot bordered on three sides by residential apartment blocks and on the fourth side by the Lukavica Road in Dobrinja 3B, a residential settlement. At least twelve people, including 3 children under the age of 15 years, were killed and at least 70 people, including 10 children, were wounded. The origin of fire was VRS-held territory approximately to the east-south-east.	01-Jun-93

2	An 82 mm mortar shell was fired upon about 100 civilians who were waiting to access a communal water pump in the front yard of a residence at 39 Hakije Turajlica (previously Aleja Branka Bulica then Spasenije Cane Babovic) in Dobrinja, a residential settlement. At least twelve people were killed and fourteen people were wounded. The origin of fire was VRS-held territory approximately to the west-north-west.	12-Jul-93
3	Three mortar shells landed in the area of Alipasino Polje, the first in a park behind, and the second and third in front of residential apartment buildings at 3 Geteova Street (previously Centinjska Street) and at 4 Bosanska Street (previously Klara Cetkin Street), where children were playing. The second and third shells killed six children under the age of 15 years and wounded one adult and four such children. The origin of fire was from VRS-held territory approximately to the west.	22-Jan-94
4	A salvo of three 120 mm mortar shells hit civilians in the Dobrinja residential area. The first landed to the front of a block of flats at Oslobodilaca Sarajeva Street hitting persons who were distributing and receiving humanitarian aid and children attending religious classes. The second and third landed among persons trading at a market in an open area to the rear of the apartment buildings at Mihajla Pupina Street and Oslobodilaca Sarajeva Street. Eight people, including 1 child under the age of 15 years, were killed and at least 18 people, including 2 children were wounded. The origin of fire was from VRS-held territory, approximately to the east.	04-Feb-94
5	A 120 mm mortar shell hit a crowded open air market called "Markale," situated in a civilian area of Old Town Sarajevo, killing 66 people and wounding over 140 people, including 3 children under the age of 15 years. The origin of fire was VRS-held territory approximately to the North-North-East.	05-Feb-94
6	A 120 mm mortar shell impacted on the Igman Road amongst a group of civilians at a bus stop. One person was killed and fifteen were injured. The origin of fire was Vojkovici VRS territory.	30-Oct-94
7	Three mortar shells struck Livanjska Street, a street of civilian dwellings. Two persons were killed and six were injured. The origin of fire was Poljine direction VRS territory.	08-Nov-94
8	One 120 mm mortar shell hit Partizanska Street 18 in Hrasnica. Two children aged eight years and two years were killed and three adults were injured.	17-Nov-94

9	An 82 mm mortar shell hit adjacent to a civilian dwelling killing an elderly man and injuring his elderly wife. The origin of fire was VRS territory.	12-Dec-94
10	Two 76 mm shells in quick succession hit a flea market in the old commercial quarter of Bascarsija in Old Town. Two persons were killed and seven were injured. The origin of fire was Trebevic, VRS positions.	22-Dec-94
11	A modified aircraft bomb hit a residential area in Hrasnica at the foot of Mount Igman destroying one dwelling, severely damaging eleven other dwellings. One person was killed and three injured. The origin of fire was Ilidza, VRS territory.	07-Apr-95
12	A 60 mm mortar shell hit a concrete area near the Sarajevo railway station. Seven people were injured. The origin of fire was Zlatiste, VRS territory.	12-Apr-95
13	A missile landed and exploded on the asphalt of Safeta Zajke street at approximately 9.45, killing two and injuring five people. The missile came from the southeast, direction of Lukavica.	24-May-95
14	A modified air-bomb landed at Majdanska Street bb. Two civilians were killed and six were wounded. The origin of fire was from the southeast VRS territory of Pavlovac.	24-May-95
15	A modified air-bomb struck a building near apartment blocks in Safeta Hodzica Street, destroying the top three floors of an apartment building. This explosion was followed by several artillery rounds landing in the same area. Serious damage was caused to a number of buildings. Two people were seriously injured and fifteen persons were slightly injured. The fire was determined to have come from VRS territory to the West/Southwest.	26-May-95
16	At about 10.00 hours, a modified aircraft bomb was fired from the North West. The bomb landed and exploded on the building of the UMC and Oncology Department at Dositejeva street 4-a. There was a lot of damage and three persons were slightly injured.	16-Jun-95
17	At about 15.20 hours, a modified aircraft bomb, most probably fired from Lukavica, exploded next to 10, Trg Medjunarodnog Prijateljstva, slightly injuring seven people and causing considerable damage to neighboring buildings.	16-Jun-95
18	At 17.20 hours, a modified aircraft bomb was fired from the North West. It exploded on the builder house at Cobanija Street 7. Two people were wounded.	16-Jun-95

19	A 120 mm mortar shell struck a line of civilians, numbering approximately 50-70, waiting for water distribution in Marka Oreskovica Street, Dobrinja. Seven people were killed and twelve injured. The origin of fire was Nedzarici, VRS territory.	18-Jun-95
20	A projectile was fired into the street Bulevar Mese Selimovica, probably from the direction of Rajlovac. There were no victims.	29-Jun-95
21	At about 13.30 hours, a high impact missile landed just outside the house number 5 in Radenko Abazovica. It was fired from the Western part of the city (Ilidza - Rajlovac). There were no victims.	01-Jul-95
22	At about 21.30 hours, a rocket projectile with a concussion warhead exploded in Bunicki Potok street. Thirteen people were injured. The projectile came from Ilidza.	01-Jul-95
23	A 120 mm mortar shell hit close to a dwelling at Vrbanjusa 95 (a residential area). One boy was killed. The origin of fire was VRS territory in the South.	19-Jul-95
24	A rocket missile with concussion warhead, coming from the direction of Ilidza/ Blazuj, landed on the house Sokolovici, Bjelasnicka Street 54. Two persons were killed and eleven were lightly wounded.	23-Jul-95
25	A modified explosive device exploded at the staircase between the 2nd and the 3rd floor of the BITAS building in Zmaja od Bosne Street 64. One person died, another received light injuries. The origin of fire was VRS territory in the South West.	22-Aug-95
26	A 120 mm mortar shell landed in Mula-Mustafe Baseskije Street outside the entrance to the City Market. 43 people were killed and 75 were injured. The origin of fire was Trebevic, VRS territory.	28-Aug-95