



International Residual Mechanism  
for Criminal Tribunals

Case No: MICT-15-96-A  
MICT-15-96-T  
Date: 29 September 2021  
Original: English

**IN THE APPEALS & TRIAL CHAMBER**

**Before:** Judge Carmel Agius, Presiding  
Judge Lee G. Muthoga  
Judge Aminatta Lois Runeni N’gum  
Judge Yusuf Aksar  
Judge Claudia Hofer

**Registrar:** Mr. Abubacarr Tambadou

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ  
FRANKO SIMATOVIĆ**

***PUBLIC***

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

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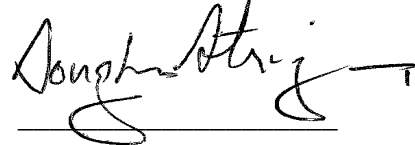
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1. The Prosecution hereby files the public redacted version of its Final Trial Brief and Annexes A through G.<sup>1</sup> Confidential testimony and exhibits under seal have been redacted from the Brief and the Annexes.<sup>2</sup>

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Douglas Stringer  
Senior Trial Attorney

Dated this 29th day of September 2021  
At The Hague, The Netherlands

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<sup>1</sup> *Prosecutor v. Jovica Stanišić and Franko Simatović*, Case No.MICT-15-96-T, Prosecution Final Trial Brief, 12 March 2021.

<sup>2</sup> Paragraph numbers in this public version are the same as in the confidential version of the Brief. However, the replacement of all sections of redacted text with the single word “[REDACTED]” results in page numbers differing slightly between the public and confidential briefs.

**UNITED  
NATIONS**



International Residual Mechanism  
for Criminal Tribunals

Case No: MICT-15-96-T

Date: 12 March 2021

Original: English

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**IN THE TRIAL CHAMBER**

**Before:** Judge Burton Hall, Presiding  
Judge Joseph E. Chiondo Masanche  
Judge Seon Ki Park

**Registrar:** Mr. Abubacarr Tambadou

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION  
WITH ANNEXES A through G***

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**PROSECUTION FINAL TRIAL BRIEF**

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## I. OVERVIEW<sup>1</sup>

1. Jovica **STANIŠIĆ** and Franko **SIMATOVIĆ** (the Accused) are responsible for the crimes of persecution (Count 1), murder (Counts 2 and 3), and deportation and forcible transfer (Counts 4 and 5),<sup>2</sup> committed against non-Serbs in Croatia and BiH from 1991–1995. They committed these crimes as members of a joint criminal enterprise (JCE) aimed at forcibly and permanently removing the majority of non-Serbs from large areas of Croatia and BiH. Serb Forces<sup>3</sup> directed or controlled by the Accused or their co-JCE members and other Serb Forces acting in concert with them forcibly displaced thousands of non-Serbs through a campaign of violence. Serb Forces killed, arrested, and detained, tortured, raped, and otherwise mistreated non-Serbs. Serb Forces destroyed non-Serb villages and towns, including religious buildings, and plundered non-Serbs' property.

2. Prior to and throughout the existence of the common criminal purpose (CCP), **STANIŠIĆ** and **SIMATOVIĆ** were high-level officials of the State Security Service (SerbianDB) of the Ministry of Interior of the Republic of Serbia (SMUP)—Serbia's premier security/intelligence body. **STANIŠIĆ** was, throughout the Indictment period, the head or effective head of the SerbianDB. **SIMATOVIĆ** was his close associate, subordinate, and operational commander, extensively involved in field operations training and commanding Serb Forces that implemented the CCP.

3. The Accused acted in concert with a group of high-level political, military, and police figures who shared the intent that the charged crimes should be carried out. These included Serbian President Slobodan MILOŠEVIĆ, the most powerful figure in Serbia and SFRY/FRY during the relevant period. As high-level officials in MILOŠEVIĆ's SerbianDB, **STANIŠIĆ** and **SIMATOVIĆ** were in a position to exercise authority over or influence political, military, police and paramilitary bodies, including those led by other JCE members, in Serbia and in the areas in Croatia and BiH where the CCP was implemented.<sup>4</sup>

<sup>1</sup> Detailed citations to trial evidence are provided in subsequent sections addressing these topics.

<sup>2</sup> Deportation and forcible transfer are collectively referred to as forcible displacement.

<sup>3</sup> Indictment, para.6.

<sup>4</sup> *Cross-reference* Section [II.C](#) - [II.E](#); Section [IV.B](#).

4. In addition to MILOŠEVIĆ, JCE members included:<sup>5</sup>

- Croatian Serbs Milan BABIĆ and Milan MARTIĆ, leaders of the self-declared Serb autonomous region in Croatia's Krajina region (SAO-Krajina), and Goran HADŽIĆ, the political leader of the Serb autonomous region of Slavonia Baranja and Western Srem (SAO-SBWS).
- Radovan STOJIČIĆ, aka BADŽA, was a SMUP police official deployed to SAO-SBWS in 1991, exercising field command over SAO-SBWS TO forces.
- Željko RAŽNATOVIĆ aka ARKAN led the paramilitary Serbian Volunteer Guard (SDG).<sup>6</sup>
- In BiH, Radovan KARADŽIĆ and Ratko MLADIĆ were the political and military leaders of the Serb-declared Republika Srpska (RS).<sup>7</sup> Momčilo KRAJIŠNIK and Biljana PLAVŠIĆ were Bosnian Serb politicians who advocated and contributed to the goal of removing non-Serbs from their claimed territory in BiH. Mićo STANIŠIĆ, as head of Serb police bodies in BiH, used the police forces he controlled to contribute to the goal of permanently removing non-Serbs from Serb-claimed territories in BiH.
- Radmilo BOGDANOVIĆ was a Serbian Minister of Interior, playing an important role in arming Serbs outside of Serbia and exercising his power to enable ARKAN to commit crimes with impunity.
- Veljko KADIJEVIĆ and Blagoje ADŽIĆ oversaw the transformation of the JNA into a Serb Force that joined other Serb Forces implementing the CCP.
- Mihalj KERTES was a trusted associate of MILOŠEVIĆ's and STANIŠIĆ's, active in arming Serbs.
- Vojislav ŠEŠELJ advocated ethnic separation and incited inter-ethnic violence, assembling volunteers—some of whom were trained at SerbianDB camps—who deployed into Croatia and BiH to commit crimes against non-Serbs.

<sup>5</sup> Cross-reference Section [II.C.](#)

<sup>6</sup> Cross-reference Section [II.D.2\(b\)](#).

<sup>7</sup> See AF494.

5. Utilising their proximity to MILOŠEVIĆ and their authority over the SerbianDB, the Accused were uniquely placed to set the stage for and participate in the implementation of the CCP—all in ways intended to conceal their own involvement and that of Serbia’s leadership.

6. By at least April 1991, the JCE members had formed the CCP to forcibly and permanently displace non-Serbs from claimed territories in Croatia and BiH through the commission of the charged crimes.

7. Already before April 1991, the Accused had begun assisting, advising, and arming<sup>8</sup> Serb Forces in SAO-Krajina and SAO-SBWS. Setting the stage for implementation of the CCP, the Accused participated in establishing separate Serb police, military, and government institutions and other Serb forces in Croatia and BiH, through which the CCP was implemented. The Accused were instrumental in establishing training facilities in Croatia, BiH, and Serbia, where they trained Serb fighters used to implement the CCP.<sup>9</sup> They played key roles in establishing extra-legal lines of authority and informal networks to ensure that MILOŠEVIĆ and the Belgrade JCE members retained control over the Serb-claimed territories in Croatia and BiH,<sup>10</sup> and provided channels of authority and communication to coordinate among JCE members to efficiently advance their CCP.<sup>11</sup>

8. In the summer of 1991, Serb Forces launched the first attacks in pursuit of the CCP in Croatia, virtually simultaneously in SAO-Krajina and SAO-SBWS. JCE members used Serb Forces, including the SerbianDB’s own special purpose unit (the “Unit”), MARTIĆ’s SAO-Krajina police, local TO units, and the SDG to intimidate and attack non-Serb civilians to permanently remove them from the claimed territory,<sup>12</sup> often acting jointly with the JNA. In these joint operations, Serb Forces employed artillery attacks on villages, neutralising the opposition and causing civilians to flee, then entered the villages, killing remaining civilians and others *hors de combat*, torching houses and churches, plundering property. In 1992, the JCE members consolidated their control over what was by then the territory of the self-declared Republic of Serbian Krajina (RSK),

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<sup>8</sup> Cross-reference Section [II.E.3.](#)

<sup>9</sup> Cross-reference Section [II.E.4.](#)

<sup>10</sup> Cross-reference Section [II.E.1.](#)

<sup>11</sup> Cross-reference Section [II.E.2.](#)

<sup>12</sup> Cross-reference Section [II.F.1](#); Section [II.F.2.](#)



continuing to persecute and expel remaining non-Serbs, and exploiting the Vance Peace Plan to make their ethnic cleansing gains permanent.<sup>13</sup>

9. In 1991 and 1992, **STANIŠIĆ** and **SIMATOVIĆ** worked with KARADŽIĆ and the Bosnian Serb leadership, using the model applied in Croatia to establish separate Serb institutions and Forces in BiH. They used these institutions and forces to continue the violent persecutory campaign against non-Serbs that had begun in Croatia. The CCP was unleashed in BiH in April 1992 and implemented in the charged municipalities of Bijeljina, Bosanski Šamac, Doboj, Sanski Most, Trnovo, and Zvornik.<sup>14</sup> The campaign continued until late 1995, marked by killings, persecution, and the forced displacement of thousands of non-Serbs from their homes and communities across wide swaths of the country.<sup>15</sup>

10. The massive demographic change in the territories claimed by the JCE members shows that they were largely successful in achieving their goals. In Croatia, at least 191,000 people were displaced between 1 April 1991 and 30 April 1995, with over 97% being ethnic Croats and other non-Serbs.<sup>16</sup> In BiH, the number of non-Serb refugees and internally displaced from the five relevant municipalities was estimated to be some 145,000.<sup>17</sup>

11. **STANIŠIĆ** and **SIMATOVIĆ** made major contributions to the CCP, in particular in the following ways:

- They armed, supported, controlled, and commanded some of the physical perpetrators. They created the Unit, a special purpose unit of the SerbianDB, which remained directly under their command throughout the Indictment period. They controlled ARKAN's SDG and the Scorpions, either directing their activities or permitting other JCE members to direct them. They also established, armed, and trained Serb police and TO units in Croatia and BiH.
- They trained Serb Forces in Croatia and BiH in an integrated network of covert training camps that they established and operated. Serb fighters trained in these

<sup>13</sup> Cross-reference Section [II.F.3](#).

<sup>14</sup> Indictment, para.22,26,64.

<sup>15</sup> Cross-reference Section [II.F.4](#); Section [II.F.5](#).

<sup>16</sup> BIJAKJakub:[P00595](#), p.31.

training camps themselves went on to participate in operations implementing the CCP, directed by the Accused or other JCE members. They trained, equipped, and coordinated units from political parties in Serbia, including ŠEŠELJ's SRS volunteers.

- They provided material, logistical, and intelligence support—including weapons, equipment, and fuel—to other units that committed crimes in furtherance of the CCP, notably police and TO units in Croatia and BiH.
- **STANIŠIĆ** served as an important coordinator between the Serb leadership in Belgrade—notably MILOŠEVIĆ—and JCE members in Croatia and BiH. Both Accused acted as part of the extra-legal structures and networks established to circumvent lawful institutions and authorities. This facilitated coordination, communication, and information access among various JCE members and Serb Forces, furthering the implementation of the CCP.

12. As set out in more detail below, the CCP and the JCE members' shared intent encompassed all crimes charged in the Indictment. In the alternative, the CCP and shared intent encompassed deportation and forcible transfer as set out in Counts 4 and 5. Other persecutory acts and the charged murders were foreseeable consequences of the CCP.

13. The Accused's contributions to the CCP are such that they also substantially contributed to the charged crimes, thus aiding and abetting their commission. In addition, the Accused planned and ordered many of the charged crimes.

14. After this Overview, this Brief is organised as follows:

- a. Section II describes the JCE, the positions, authority, and roles of the Accused as officials of the SerbianDB, the positions and roles of co- JCE members, the Accused's contributions to the JCE, and the implementation of the CCP in Croatia and BiH.
- b. Section III sets out the crimes, identifying perpetrators and the Serb Forces committing the crimes, and attributing crimes to the Accused.

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<sup>17</sup> TABEAUW: [P02069](#), p.5,102; TABEAUW: [P02073](#), p.3. Trnovo is not included among the crime bases for forcible displacement as charged in Counts 4 and 5.

- c. Section IV applies the above Sections to demonstrate the Accused's guilt for committing the crimes as members of a JCE.
- d. Section V addresses the Accused's guilt pursuant to other modes of liability.
- e. Section VI sets out the Prosecution's sentencing submissions.

This Brief is accompanied by the following Annexes:

- a. Annex A (included in word count) provides details regarding individuals having a significant relationship with the SerbianDB, who are indicated with a "DB" subscript after their name throughout in the Brief.
- b. Annex B (included in word count) sets out the verbatim text of **SIMATOVIĆ's** speech at the 1997 KOSTIĆ Centre ceremony<sup>18</sup> with citations to corroborating evidence admitted in this case.
- c. Annex C lists the evidence proving the deaths of victims as charged in the various murder incidents.
- d. Annex D lists all SerbianDB Personnel Files admitted at trial, indicating the standard forms contained therein, the Accused's signatures, JPN or JSO stamps and corroborating documents.
- e. Annex E lists payments made by the SerbianDB to individuals and groups.
- f. Annex F provides examples of signatures and handwritten markings found on SerbianDB documentation.
- g. Annex G is a table of abbreviations and authorities.

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<sup>18</sup> [P00256](#), p.9-12(00:12:25-00:19:25).

## **II. THE ACCUSED PARTICIPATED IN A JOINT CRIMINAL ENTERPRISE TO FORCIBLY DISPLACE NON-SERBS FROM CROATIA AND BIH THROUGH CRIMES**

### **A. The Common Criminal Purpose**

15. From at least April 1991, the Accused and their co-JCE members shared the CCP and the intent to commit persecution, murder, deportation, and forcible transfer against non-Serbs in areas of Croatia and BiH. By summer 1991, Serb Forces attacked non-Serb civilians in SAO-Krajina and SAO-SBWS, committing persecution, killings, and forced displacement on a massive scale.<sup>19</sup> They committed these crimes by using the Serb Forces that they controlled. From that point forward, JCE members used Serb Forces to commit a pattern of crimes against non-Serbs in Croatia and BiH in pursuit of the CCP until the end of 1995.

#### ***1. The CCP existed from at least April 1991***

16. The conduct and words of the Accused and their fellow JCE members demonstrate that by at least April 1991, they shared a CCP to forcibly and permanently remove non-Serbs by violent means from claimed territories in Croatia and BiH.

17. From late 1990 the Accused were already arming Serbs in Croatia, and by early 1991 they were arming Serbs in BiH as well.<sup>20</sup> Well before April 1991, the Accused played leading roles in a “parallel structure” in the Krajina that circumvented the local Serb leaders there, ensuring that the CCP could be carried out pursuant to the policies and directions of Belgrade-based JCE members such as the Accused and MILOŠEVIĆ.<sup>21</sup>

18. The Accused were also leading figures in the *vojna linija* (military line), an informal network of SMUP officials working at MILOŠEVIĆ’s behest who engaged in activities outside their lawful SMUP competencies, establishing links with like-minded

<sup>19</sup> Cross-reference Section [II.F.1](#); Section [II.F.2](#).

<sup>20</sup> Cross-reference Section [II.E.3](#).

<sup>21</sup> Cross-reference Section [II.E.1\(b\)](#).

JNA commanders to ensure the coordination of military operations among the various Serb Forces in forcibly removing non-Serbs from the SAO-SBWS region.<sup>22</sup>

19. MILOŠEVIĆ, the most powerful figure in Serbia,<sup>23</sup> embraced violent Serb nationalism and accepted ethnic cleansing as a means to retain power and establish Serb “statelets” in Croatia and BiH.<sup>24</sup> In March 1991 he announced the formation of special Serbian police units that would be deployed to “protect” Serbs outside of Serbia.<sup>25</sup>

20. Following MILOŠEVIĆ’s announcement, STANIŠIĆ dispatched SIMATOVIĆ in March 1991 to establish the SerbianDB’s flagship training camp in Golubić, SAO-Krajina. SIMATOVIĆ was based there from April to August 1991, overseeing the training of Serb Forces who JCE members later used to implement the CCP in Croatia.<sup>26</sup>

21. In late March 1991, MARTIĆ attempted to establish a police station in Plitvice to assert SAO-Krajina’s control over Plitvice National Park, provoking the first armed clash between the SAO-Krajina police and the Croatian police.<sup>27</sup>

22. In April 1991, in BiH, KARADŽIĆ and the SDS introduced “regionalisation”,<sup>28</sup> an SDS campaign to secure single nationality control of Serb-claimed territory,<sup>29</sup> one year before BiH independence.<sup>30</sup> At this time, partitioning BiH along ethnic lines became SDS policy in BiH.<sup>31</sup> STANIŠIĆ met with KARADŽIĆ, BABIĆ, and MARTIĆ the following month in Sarajevo, where they analysed maps of BiH for this purpose.<sup>32</sup>

23. In late April 1991, KERTES<sup>33</sup> described the Drina river in terms of what would become the Bosnian Serb leadership’s Third Strategic Goal, stating that “everything would be Serbian, pure Serbian, in an area of 50 kilometres from the Drina River”.<sup>34</sup>

<sup>22</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>23</sup> ROBERTSIvor:T.11-13(15-Oct-2019); ROBERTSIvor:[1D00430](#), para.60. Cross-reference Section [II.C.1](#).

<sup>24</sup> ROBERTSIvor:T.10-12,20-24(15-Oct-2019).

<sup>25</sup> [P02439](#); ANASTASIJEVIĆDejan:[P02423](#), para.20; ANASTASIJEVIĆDejan:T.11-12(13-Jun-2018).

<sup>26</sup> Cross-reference Section [II.E.4\(a\)\(i\)](#); Section [II.F.1\(b\)\(ii\)](#).

<sup>27</sup> Cross-reference Section [II.F.1](#).

<sup>28</sup> DONIARobert:T.32(31-Jan-2018); DONIARobert:T.39(2-Feb-2018).

<sup>29</sup> DONIARobert:[P01600](#), p.32; DONIARobert:T.15(30-Jan-2018).

<sup>30</sup> DONIARobert:T.39(2-Feb-2018).

<sup>31</sup> DERONJIĆMiroslav:[P01718](#), T.893-894,899-900,1138-1141,1146.

<sup>32</sup> [REDACTED].

<sup>33</sup> The positions and role of Mihalj KERTES as a JCE member are set out more fully in Section [II.C.3](#).

<sup>34</sup> DERONJIĆMiroslav:[P01717](#), para.17; DERONJIĆMiroslav:[P01718](#), T.951-952,961,1198-1199.

## **2. The policy of ethnic separation meant violent removal of non-Serbs from the targeted territories**

24. Ethnic separation of Serbs from non-Serbs in the territories claimed by the JCE members was the JCE members' goal. This was no secret. Although physical separation of peoples based on ethnicity could hypothetically be a non-criminal political aspiration, the realities on the ground in Croatia and BiH meant that the JCE members knew and intended that ethnic separation would entail violently removing non-Serbs through the charged crimes.

### **(a) Ethnic separation was the goal**

25. JCE members shared the goal of ethnic separation. MILOŠEVIĆ embraced his role as the president not just of Serbia but of all Serbs, and advocated ethnic separation in his political manoeuvrings.<sup>35</sup> MARTIĆ, HADŽIĆ, and BABIĆ announced the policy of ethnic separation in SAO-Krajina and SAO-SBWS in 1991, insisting that Serbs could no longer live among Croats.<sup>36</sup> By October 1991, KARADŽIĆ threatened the "possible extinction" of the Muslim people in BiH.<sup>37</sup> In May 1992, KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ<sup>38</sup> publicly affirmed ethnic separation as their priority and overarching goal in BiH—Goal 1 of the Six Strategic Goals.<sup>39</sup> At the RS Assembly Session of 12 May 1992, KRAJIŠNIK referred to the policy to "separate from the remaining two national communities," describing ethnic separation as "the most important" goal, and stating that "all other goals are sub-items."<sup>40</sup> The timing of this public acknowledgement<sup>41</sup> is significant because it followed the violent expulsions of non-Serbs from Serb-claimed territory in Croatia in 1991 and in BiH from April 1992, confirming that "separation"

<sup>35</sup> Cross-reference Section [II.C.1](#). E.g. [P02439](#), p.1; BABIĆMilan:[P01246](#), T.12915,13004-13005,13093-13094; BABIĆMilan:[P01243](#), p.14; ANASTASIJEVIĆDejan:[P02423](#), para.20,22-23; ANASTASIJEVIĆDejan:T.11-12(13-Jun-2018); ROBERTSIvor:[1D00432](#), p.20-21; [REDACTED]; [P01410](#), p.1.

<sup>36</sup> Cross-reference Section [II.C.8](#); Section [II.C.9](#); Section [II.C.10](#). [P01319](#); [REDACTED]; [P01558](#); [P03399](#); [REDACTED]; [P00485](#), p.6; [P00483](#), p.18; [P00456](#)(01:52:28-01:52:45)(01:55:39-01:56:33). See AF77-AF79; AF181; AF158.

<sup>37</sup> [P01588](#), p.1

<sup>38</sup> Cross-reference Section [II.C.12](#).

<sup>39</sup> DONIARobert:[P01598](#), p.10-12; DONIARobert:T.37,42-43,45-46(30-Jan-2018); DONIARobert:[P01597](#), p.24,26; DERONJIĆMiroslav:[P01726](#), p.20; NIELSENChristian:[P00850](#), para.579. See AF854.

<sup>40</sup> DONIARobert:T.45(30-Jan-2018); DONIARobert:[P01597](#), p.26.

<sup>41</sup> DONIARobert:T.43-44(30-Jan-2018).

meant violent, forced removal of non-Serbs. PLAVŠIĆ stressed the need for preparations to move “large masses of people” and “forced emigration.”<sup>42</sup>

26. As high-level SMUP officials, STANIŠIĆ and SIMATOVIĆ, aware that ethnic separation was only possible through violence, significantly contributed<sup>43</sup> to the violent realisation of that goal through *inter alia*, arming, training, and deploying Serb Forces that implemented the CCP.<sup>44</sup>

(b) Permanent removal of non-Serbs from the claimed territories required massive, forced population movements through the charged crimes

27. Well before the first ethnic cleansing operation occurred, the Accused and their co-JCE members knew that the charged crimes had to be committed to remove non-Serbs in order to create separate Serb territory. They therefore shared the intent for the commission of these crimes.

28. Prior to the conflict, the regions targeted by the JCE members were ethnically mixed, with some areas predominately non-Serb.<sup>45</sup> The mixed demographic character of the Serb-claimed territories made it inevitable that taking control would require removing the non-Serb populations, and that removing people on this scale could only be achieved through violent crimes, including murder.<sup>46</sup>

29. Thus, violent ethnic cleansing was not a by-product of the war, but its intended consequence, and the Accused and other JCE members understood and intended such violence to achieve their territorial ambitions.<sup>47</sup> The goal was not just to take territory, but to change the demographic composition of those territories by violently removing

<sup>42</sup> [ID01310](#), p.25-26

<sup>43</sup> Cross-reference Section [II.E.3](#); Section [II.E.4](#); Section [IV.B.](#)

<sup>44</sup> Cross-reference Section [II.F.](#)

<sup>45</sup> BIJAKJakub:[P00595](#), p.9-10,77-139(see Settlements/Municipalities, e.g. Vukovar: 43.8% Croat, 37.4% Serb; Bruška: 89.5% Croat, 10.5% Serb; Knin: 13.5% Croat, 80% Serb; Erdut: 54.7% Croat, 22.8% Serb; Ilok: 62.7% Croat, 7.1% Serb); BIJAKJakub:T.42-43(3-Oct-2017)(Krajina: 43.3% Croat, 51% Serb; SBWS: 46% Croat, 33.9% Serb); TABEAUewa:[P02069](#), p.21(1991 BiH census figures: Bosanski Šamac: 41.3% Serb, 6.8% Muslim, 44.7% Croat; Brčko: 20.7% Serb, 44.1% Muslim, 25.4% Croat; Doboj: 38.8% Serb, 40.1% Muslim, 12.9% Croat; Sanski Most: 42.1% Serb, 46.7% Muslim, 7.2% Croat; Zvornik: 38% Serb, 59.2% Muslim, 0.2% Croat). See AF1042.

<sup>46</sup> ROBERTSIvor:T.12(15-Oct-2019); DONIARobert:T.29(1-Feb-2018); BABIĆMilan:[P01246](#), T.13064.

<sup>47</sup> ROBERTSIvor:T.23,25(15-Oct-2019); [REDACTED].

non-Serbs.<sup>48</sup> The pattern of crimes that accompanied every successful takeover of territory confirms this.

30. The charged crimes occurred in the context of an armed conflict between Serb, Croatian, and BiH forces that accompanied the dissolution of the SFRY. Depending on the place and time, members of all ethnic groups were victims of persecution and violence at the hands of another group. However, the crimes committed by the Accused and their co-JCE members can neither be justified by the conduct of others, nor are they the result of legitimate combat operations. Rather, the pattern of crimes committed by Serb Forces directed by the Accused and co-JCE members for more than four years shows they were carried out in pursuit of a criminal purpose and with shared criminal intent. The scale and duration of the campaign of violent displacement of non-Serb populations across Croatia and BiH makes clear that their removal was the design, achieved by the combined efforts and contributions of **STANIŠIĆ**, **SIMATOVIĆ**, and their co-JCE members, each acting within their respective spheres of authority.

(c) Given the criminal nature of the CCP, the Accused used the secretive SerbianDB to circumvent lawful structures and conceal authority over paramilitaries

31. The illicit, extra-legal, and surreptitious manner in which the Accused and co-JCE members set the stage for and executed the CCP shows that they were not just pursuing and contributing to legitimate political or military goals during a tumultuous period.<sup>49</sup>

32. In developing the CCP and creating the circumstances to implement it, the Accused exploited the covert nature of the SerbianDB to bypass official lines of authority and to support and direct Serb Forces abroad, concealing their involvement in activities that were illegal under the laws in place at the time or were otherwise beyond their lawful competence.<sup>50</sup>

33. Over time, the Accused, working covertly through the SerbianDB, enabled MILOŠEVIĆ to thwart the international community's attempts to force him to stop supporting Serb Forces and Serb authorities implementing the CCP in Croatia and BiH.<sup>51</sup>

<sup>48</sup> ROBERTSIvor:T.23,25(15-Oct-2019); [REDACTED].

<sup>49</sup> *Contra Stanišić* Pre-trial Brief, para.137-142.

<sup>50</sup> Cross-reference Section [II.E.1.](#)

<sup>51</sup> Cross-reference Section [II.F.5\(a\)](#).



Concealing their involvement, the Unit's deployments in Croatia and BiH were covert and outside the legal framework for deployment.<sup>52</sup>

34. The cooperation with known assassin and JCE member ARKAN supports the conclusion that their common purpose was, in fact, criminal. ARKAN associated and coordinated with nearly all of the named JCE members during the Indictment period, despite his public acknowledgement of his war crimes beginning in 1991.<sup>53</sup> The Accused and other JCE members who continued to coordinate with and rely on him, even after it became clear that he and the SDG were committing violent crimes against non-Serbs, viewing ARKAN as an integral member of the Serb Forces.<sup>54</sup>

## **B. STANIŠIĆ and SIMATOVIĆ held key positions in the SerbianDB and used the SMUP and SerbianDB structures to pursue the CCP**

35. STANIŠIĆ and SIMATOVIĆ were experienced SerbianDB professionals who played key roles in furthering the CCP throughout the Indictment period. Possessing *de jure* powers as high-level SerbianDB officials, and *de facto* authority and influence derived from their proximity to MILOŠEVIĆ, and roles in unofficial structures of authority implementing his policies outside Serbia, they were well-positioned to make significant contributions to the JCE. The Accused's roles in the JCE were shaped and facilitated by their positions in the SMUP and SerbianDB, which were ideal structures through which they and their co-JCE members furthered the CCP.

### **1. STANIŠIĆ effectively headed the SerbianDB, and was the dominant authority in the SMUP, throughout the Indictment Period**

36. STANIŠIĆ was the most powerful individual in the SerbianDB throughout the Indictment period. Before his promotion to SerbianDB Chief on 31 December 1991,<sup>55</sup> STANIŠIĆ officially held the position of Deputy Chief,<sup>56</sup> but was already the dominant figure within the SerbianDB and the SMUP, exercising "unquestionable" authority.<sup>57</sup>

<sup>52</sup> MILOŠEVIĆMilan:T.23-24(25-Feb-2020); MILOŠEVIĆMilan:T.8-9(26-Feb-2020).

<sup>53</sup> Cross-reference Section II.C.5. [REDACTED]; SAVIĆBorivoje:P00449, para.172; [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.144; NOVAKOVIĆStojan:T.21(6-Oct-2020); [REDACTED]; P03164, p.2; BOGUNOVIĆBorislav:P02719, para.18,23; [REDACTED]; VASILJEVIĆAleksandar:T.22-25(6-Feb-2019); [REDACTED].

<sup>54</sup> Cross-reference Section II.C.5; Section IV.C.4(a).

<sup>55</sup> P03249, p.4; NIELSENChristian:P00850, para.77.

<sup>56</sup> [REDACTED]; 1D00043, p.30,32-33.

<sup>57</sup> VASILJEVIĆAleksandar:P02694, T.15863; [REDACTED]; BABIĆMilan:P01246, T.13503.

**STANIŠIĆ** had more experience, operative knowledge, and influence than Chief Zoran JANAČKOVIĆ, a political appointee,<sup>58</sup> in 1991.<sup>59</sup> Many JCE members and their associates (including **STANIŠIĆ** himself) considered **STANIŠIĆ** to be the effective Chief of the SerbianDB.<sup>60</sup> After Zoran SOKOLOVIĆ replaced JCE member BOGDANOVIĆ as SMUP Minister in June 1991,<sup>61</sup> **STANIŠIĆ** was the “real power within the Serbian MUP” as a whole: SOKOLOVIĆ was a figurehead who rubberstamped **STANIŠIĆ**’s decisions.<sup>62</sup>

37. Throughout 1991, **STANIŠIĆ** exercised authority as MILOŠEVIĆ’s “Number Two” and was entrusted with spearheading Serbia’s covert participation in the implementation of the CCP.<sup>63</sup> He was “first and foremost” in MILOŠEVIĆ’s informal power structures,<sup>64</sup> wielding extensive authority over officials and paramilitary units outside of *de jure* SMUP structures to advance the CCP through unofficial channels in Croatia and BiH.<sup>65</sup> **STANIŠIĆ** communicated regularly with senior political and military leaders, including JCE members, to ensure that Croatian and Bosnian Serbs had the means to implement the CCP.<sup>66</sup>

38. [REDACTED]<sup>67</sup> [REDACTED]. [REDACTED],<sup>68</sup> [REDACTED].<sup>69</sup> On 31 December 1991, MILOŠEVIĆ promoted **STANIŠIĆ** as SerbianDB Chief, harmonising his existing *de facto* and *de jure* authority over the SerbianDB.<sup>70</sup>

<sup>58</sup> [REDACTED].

<sup>59</sup> VASILJEVIĆAleksandar:[P02692](#); [REDACTED]; VASILJEVIĆAleksandar:[P02694](#), T.15862-15863; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.40; [REDACTED].

<sup>60</sup> BABIĆMilan:[P01246](#), T.13503; BABIĆMilan:[P01248](#), T.1392; [REDACTED]; [REDACTED]; VASILJEVIĆAleksandar:[P02694](#), T.15862-15863; BOGUNOVIĆBorislav:[P02719](#), para.14; [REDACTED]; [P02433](#), p.1; ANASTASIJEVIĆDejan:[P02423](#), para.41,163.

<sup>61</sup> Cross-reference Section [II.C.2](#).

<sup>62</sup> VASILJEVIĆAleksandar:[P02694](#); [REDACTED]; [1D00059](#), p.2; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.64; [REDACTED]; [P03155](#), p.2.

<sup>63</sup> BABIĆMilan:[P01246](#), T.13175-13176,13877; BABIĆMilan:[P01248](#), T.1567; ANASTASIJEVIĆDejan:[P02423](#), para.40-41; [REDACTED]; VASILJEVIĆAleksandar:[P02694](#), T.15862-15863; [REDACTED]; [P03155](#), p.2.

<sup>64</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>65</sup> VASILJEVIĆAleksandar:[P02686](#); BABIĆMilan:[P01246](#), T.13490-13491; ANASTASIJEVIĆDejan:[P02423](#), para.40.

<sup>66</sup> Cross-reference Section [II.E.3\(a\)\(ii\)](#); Section [II.E.3\(a\)\(iv\)](#); Section [II.E.3\(b\)](#);Section [II.F.1\(a\)\(c\)](#); Section [II.F.1\(b\)\(i\)a](#); Section [II.F.2\(a\)](#); Section [II.F.3\(b\)](#); Section [II.F.4\(a\)\(ii\)a-b](#); Section [II.F.5\(a\)\(i\)-\(iii\)](#).

<sup>67</sup> [REDACTED].

<sup>68</sup> [REDACTED].

<sup>69</sup> [1D00043](#), p.27,34; NIELSENChristian:T.104-107(23-Nov-2017). **STANIŠIĆ** remained active during the commission’s investigation: e.g. [P00242](#), p.5(signature identified as **STANIŠIĆ**’s (NIELSENChristian:T.67(14-Nov-2017)), which the **STANIŠIĆ** defence accepts (MIĆIĆRadivoje:T.6(4-Mar-2020)); [REDACTED]; BOGUNOVIĆNebojša:T.26-27(4-Sep-2019); [REDACTED]; [1D00042](#);

39. A cold,<sup>71</sup> competent professional,<sup>72</sup> **STANIŠIĆ** was “an extraordinary manager and extraordinary operative”<sup>73</sup>—an ideal choice to carry out both the SerbianDB’s official responsibilities and its extra-legal work advancing the CCP. **STANIŠIĆ** ran a tight ship: he exercised full authority over and clearly instructed his subordinates, with no room for misunderstanding, and ensured that he was well-informed about their activities.<sup>74</sup> **STANIŠIĆ** decided on the SerbianDB’s activities and priorities, including allocation of personnel and financial resources.<sup>75</sup> **STANIŠIĆ** had the obligation and ability to take disciplinary action against his subordinates, including the SerbianDB Unit.<sup>76</sup>

40. High-level witnesses from across the spectrum recognised **STANIŠIĆ**’s absolute authority, stating that: once **STANIŠIĆ** decided, “no further comment [was] possible” (JNA SSNO);<sup>77</sup> [REDACTED];<sup>78</sup> **STANIŠIĆ** had authority to deliver a death threat on behalf of MILOŠEVIĆ, as his “feared secret security chief” (UK Ambassador to Serbia).<sup>79</sup>

## **2. SIMATOVIĆ advanced within the 2<sup>nd</sup> Administration as he contributed to the CCP**

41. Like **STANIŠIĆ**, **SIMATOVIĆ**’s *de facto* authority and responsibilities exceeded his *de jure* positions. He enjoyed immense influence as **STANIŠIĆ**’s “most important man” regardless of his title.<sup>80</sup> From December 1990, **SIMATOVIĆ** was

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[P00522](#), p.27(signature on p.21(BCS)); [REDACTED]; [P00857](#), p.3. Cross-reference Section [II.F.1\(b\)\(i\)-\(ii\)](#).

<sup>70</sup> [REDACTED]; NIELSENChristian:[P00850](#), para.77; [P03249](#), p.4.

<sup>71</sup> [REDACTED].

<sup>72</sup> VASILJEVIĆAleksandar:T.30(6-Feb-2019); [1D00484](#), p.1,3; DRAGIČEVIĆVlado:T.35-36(17-Oct-2019); [REDACTED].

<sup>73</sup> CVETKOVIĆVojislav:T.5,13-14(2-Sep-2020).

<sup>74</sup> KRSMANOVIĆDragoslav:T.8-9(1-Oct-2019); [REDACTED]; DRAGIČEVIĆVlado:T.14-15(16-Oct-2019); [REDACTED]; BOGUNOVIĆNebojša:T.27(4-Sep-2019); [REDACTED]; CVETKOVIĆVojislav:T.18(1-Sep-2020); CVETKOVIĆVojislav:T.2-3(3-Sep-2020); [REDACTED]. See MILOŠEVIĆMilan:T.42-44(25-Feb-2020); CVETKOVIĆVojislav:T.13(1-Sep-2020).

<sup>75</sup> E.g. [REDACTED]; DRAGIČEVIĆVlado:T.14(16-Oct-2019); NOVAKOVIĆRadenko:T.12(17-Sep-2019); NOVAKOVIĆRadenko:T.43-44(18-Sep-2019); [REDACTED]; KRSMANOVIĆDragoslav:T.8-10(1-Oct-2019); [REDACTED].

<sup>76</sup> Cross-reference Section [IV.C.7](#).

<sup>77</sup> VASILJEVIĆAleksandar:[P02687](#); [REDACTED].

<sup>78</sup> [REDACTED].

<sup>79</sup> ROBERTSIvor:T.17(15-Oct-2019).

<sup>80</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13181,13524-13525,13650-13651; BABIĆMilan:[P01248](#), T.1428-1429; [REDACTED].

officially a Senior Inspector and Head of Section for counter-intelligence monitoring the USA in the Belgrade Centre's 2<sup>nd</sup> Department.<sup>81</sup> However, like **STANIŠIĆ**, he was one of the key players in informal structures used to enhance MILOŠEVIĆ's control over key institutions needed to implement the CCP.<sup>82</sup> As such, his primary responsibilities in late 1990 to 1991 largely consisted of activities *ultra vires* his official duties as a Belgrade office operative ostensibly focused on the USA.

42. Thus, contrary to the SerbianDB's lawful mandate, he covertly deployed outside of Serbia into SAO-Krajina by April 1991, where he was entrusted with primary responsibility for establishing the SerbianDB's intelligence operation on the ground; organising the SerbianDB's flagship training centre at Golubić; establishing the SerbianDB's own paramilitary Unit under his command; training, arming and equipping SAO-Krajina police and TO units; and using the SerbianDB's 2<sup>nd</sup> "War Service Intelligence" Administration to coordinate the Unit and other Serb Forces in some of the first ethnic cleansing operations.<sup>83</sup> In March 1992, **STANIŠIĆ** issued a backdated decision assigning **SIMATOVIĆ** to Kosovo from 12 April until 17 October 1991—an approving superior's administrative cover-up for his top subordinate's prolific extra-legal activities in SAO-Krajina.<sup>84</sup>

43. Under **STANIŠIĆ**'s direction, **SIMATOVIĆ** acquired greater *de jure* authority during the Indictment period. In his January 1992 reorganisation of the SerbianDB,<sup>85</sup> **STANIŠIĆ** remade the 2<sup>nd</sup> Administration. He replaced its counter-intelligence mandate with intelligence—formalising the *de facto* practice that **SIMATOVIĆ** had spearheaded in SAO-Krajina in 1991<sup>86</sup>—and separated it from the other seven Administrations physically and operationally.<sup>87</sup> Given **SIMATOVIĆ**'s significant contributions to the JCE during 1991, **STANIŠIĆ** brought him "significantly more proximate" to power,<sup>88</sup>

<sup>81</sup> [P00831](#), p.47,51-53,125-126; [REDACTED]; NIELSENChristian:[P00850](#), para.85; [P03195](#), p.5.

<sup>82</sup> *Cross-reference* Section [II.E.1\(a\)](#)-(b).

<sup>83</sup> [P00256](#), p.9-10. *Cross-reference* Section [II.D.1\(a\)](#); Section [II.D.2\(a\)\(i\)](#); Section [II.E.3\(a\)\(i\)](#); Section [II.F.1\(b\)\(i\)](#)-(iii); Section [II.F.1\(c\)\(ii\)](#).

<sup>84</sup> [P00831](#), p.50; NIELSENChristian:[P00850](#), para.86; [REDACTED].

<sup>85</sup> NIELSENChristian:[P00850](#), para.114; [REDACTED].

<sup>86</sup> [P00256](#), p.10; [REDACTED]; NIELSENChristian:T.66-69(14-Nov-2017)(**STANIŠIĆ**'s initials/signature on [P00242](#), p.1,5(BCS)); NOVAKOVIĆRadenko:T.44(18-Sep-2019).

<sup>87</sup> [REDACTED]; NOVAKOVIĆRadenko:T.12(17-Sep-2019); NOVAKOVIĆRadenko:T.43(18-Sep-2019).

<sup>88</sup> NIELSENChristian:T.50(22-Nov-2017).

promoting him to Deputy Head of the 2<sup>nd</sup> Administration in April 1992,<sup>89</sup> Special Advisor to the SerbianDB Chief in May 1993,<sup>90</sup> and retaining **SIMATOVIĆ** as his Special Advisor<sup>91</sup> while elevating him to Chief of the 2<sup>nd</sup> Administration that same year.<sup>92</sup>

44. The insular 2<sup>nd</sup> Administration provided the perfect vehicle for **SIMATOVIĆ**'s continuing responsibilities in the JCE, always under **STANIŠIĆ**'s leadership.<sup>93</sup> These included tasks within his official SerbianDB role—such as overseeing the SerbianDB's intelligence gathering to facilitate JCE members' plans and actions—and extra-legal activities that furthered the CCP in Croatia and BiH. **SIMATOVIĆ** continued to command the Unit,<sup>94</sup> later signing as head of the JATD organisational unit on official SerbianDB documentation.<sup>95</sup> He was responsible for the SerbianDB's engagement of paramilitaries, most notably (in addition to the Unit) the SDG and Scorpions.<sup>96</sup> **SIMATOVIĆ** had primary responsibility on the ground for the SerbianDB's network of training camps.<sup>97</sup> As 2<sup>nd</sup> Administration Chief, **SIMATOVIĆ** had the power to make decisions for issuing weapons and earmarking funds.<sup>98</sup> In all of his roles, **SIMATOVIĆ** had the obligation and ability to take disciplinary action against subordinates—both in the 2<sup>nd</sup> Administration and in the Unit.<sup>99</sup> As **STANIŠIĆ**'s subordinate, **SIMATOVIĆ**

<sup>89</sup> [P00831](#), p.51; [P03195](#), p.5; NIELSENChristian:[P00850](#), para.87; NIELSENChristianT.35-36(14-Nov-2017); [REDACTED].

<sup>90</sup> [P00831](#), p.53; [P03195](#), p.4; [REDACTED].

<sup>91</sup> Notwithstanding evidence led by the Defence, SerbianDB employees could concurrently hold the positions of Special Advisor and Administration Chief: *see* [REDACTED]; DRAGIČEVIĆVlado:T.44,46(17-Oct-2019); [REDACTED]. *Contra* MILOŠEVIĆMilan:T.41-42(19-Feb-2020).

<sup>92</sup> DRAGICEVIĆVlado:T.34(17-Oct-2019)(Dragan FILIPOVIĆ<sub>(DB)</sub> became Deputy Chief of the 2<sup>nd</sup> Administration “once **SIMATOVIĆ** was made chief”); [REDACTED]; [P03195](#), p.5; [REDACTED]; [P00860](#); NIELSENChristian:T.36-37(14-Nov-2017); [REDACTED]; [P00849](#), p.1; [REDACTED]; [2D00459](#), p.5-6(p.3(BCS))(**SIMATOVIĆ** signed as head of the 2<sup>nd</sup> Administration organisational unit); KRSMANOVIĆDragoslav:[1D00386](#), p.8. **SIMATOVIĆ**'s personnel file is not complete: NIELSENChristian:T.56(22-Nov-2017).

<sup>93</sup> [REDACTED]. *See* CVETKOVIĆVojislav:T.18(1-Sep-2020); CVETKOVIĆVojislav:T.2-3(3-Sep-2020); [REDACTED]. *See also* MILOŠEVIĆMilan:T.42-44(25-Feb-2020); [REDACTED].

<sup>94</sup> *Cross-reference* Section [II.D.2\(a\)\(ii\)](#); Section [II.D.2\(a\)\(iii\)](#); Section [II.D.2\(a\)\(iv\)](#); Section [II.D.2\(a\)\(v\)](#); Section [II.D.2\(a\)\(vi\)\(a\)](#).

<sup>95</sup> [P02297](#), p.1(p.1(BCS)); NIELSENChristian:T.44(14-Nov-2017); KRSMANOVIĆDragoslav:[1D00386](#), p.8; AnnexF.

<sup>96</sup> [REDACTED]; [1D00067](#), p.6; THEUNENSReynaud:T.58(6-Mar-2018); [REDACTED]; [P03860](#)(impeachment); NOVAKOVIĆStojan:T.39-40(8-Oct-2020); [1D00102](#), p.15. *Cross-reference* Section [II.D.2\(a\)-\(c\)](#).

<sup>97</sup> *E.g.* [REDACTED]; RFJ-066:T.28(10-Jul-2017); [REDACTED]; DERONJIĆMiroslav:[P01717](#), para.134-138. *Cross-reference* Section [II.E.4](#).

<sup>98</sup> [REDACTED].

<sup>99</sup> *Cross-reference* Section [IV.C.7](#).

followed STANIŠIĆ's orders, and was not permitted to act without STANIŠIĆ's approval.<sup>100</sup>

**3. The SMUP/SerbianDB was uniquely placed to play a pivotal role in furthering the CCP**

45. The SMUP—and especially the SerbianDB, with STANIŠIĆ at the helm and SIMATOVIĆ overseeing key functions—was a “very influential institution” that functioned as the long arm of MILOŠEVIĆ in Serb-claimed territories in Croatia and BiH throughout the Indictment Period.<sup>101</sup> The SMUP's combination of police and security functions, acting directly under the President, made it an ideal vehicle for the Accused to use in furthering the CCP during a conflict that required extensive covert activity and the might of militarised police forces.

(a) The SerbianDB had primacy over the SerbianJB, and the two services coordinated closely

46. The SMUP was the primary vehicle through which MILOŠEVIĆ exerted control over Serbia and, through the Accused and other SMUP JCE members, over Serbs in Croatia and BiH.<sup>102</sup>

47. The SMUP was divided between the SerbianDB and SerbianJB. Officially, the SerbianJB was responsible for regular police duties, and certain special police tasks such as engaging in anti-terrorism or combat-related operations.<sup>103</sup> The SerbianDB was responsible for intelligence gathering, uncovering and preventing activities aimed at undermining or destroying the constitutionally confirmed order, or endangering the security of the country.<sup>104</sup> By law the two Services were hierarchically equal and obliged

<sup>100</sup> CVETKOVIĆVojislav:T.18(1-Sep-2020); CVETKOVIĆVojislav:T.13(1-Sep-2020); CVETKOVIĆVojislav:T.2-3(3-Sep-2020); [REDACTED]; KRSMANOVIĆDragoslav:T.8-9(1-Oct-2019); [REDACTED]; MILOŠEVIĆMilan:T.42-44(25-Feb-2020); [REDACTED]. See [REDACTED]. Cross-reference Section [II.B.1.](#)

<sup>101</sup> VASILJEVIĆAleksandar:[P02696](#); [REDACTED].

<sup>102</sup> ROBERTSIvor:T.40(15-Oct-2019); ANASTASIJEVIĆDejan:[P02423](#), para.64. Cross-reference Section [II.E.1\(a\)-\(b\)](#).

<sup>103</sup> [P03274](#), p.1; MILOŠEVIĆMilan:T.23-24(25-Feb-2020); MILOŠEVIĆMilan:T.16-17(27-Feb-2020).

<sup>104</sup> [REDACTED]; MILOŠEVIĆMilan:T.79-84,86-88(25-Feb-2020).



to cooperate with each other.<sup>105</sup> The Chiefs of both Services were *ex officio* Assistant Ministers of the SMUP and directly subordinated to the Minister.<sup>106</sup>

48. In practice, the SerbianDB functioned as MILOŠEVIĆ's Service; according to STANIŠIĆ, the SerbianDB's work during his tenure as Chief was "linked...primarily to the institution of the President of Serbia".<sup>107</sup> Thus, the SerbianDB was "the key Service for the State" and held primacy over the SerbianJB.<sup>108</sup> As the JCE members were implementing the CCP in Croatia and BiH, [REDACTED].<sup>109</sup> [REDACTED].<sup>110</sup>

49. The joint SerbianDB-SerbianJB actions demonstrate this dynamic in practice.<sup>111</sup> During Operative Action ("OA") Tomson—a nationwide initiative to disarm and disband paramilitary formations operating inside Serbia,<sup>112</sup> which lasted throughout the Indictment period<sup>113</sup>—SOKOLOVIĆ put the SerbianDB in charge.<sup>114</sup> While SerbianJB units carried out the searches, detentions and arrests,<sup>115</sup> the SerbianDB Chief served as the overall leader of the staff formed for the execution of OA Tomson,<sup>116</sup> which gave him the final decision-making authority.<sup>117</sup>

50. This same dynamic played out during joint deployments.<sup>118</sup> In September 1995, for example, the activities of the SerbianJB-PJMs deployed into ARK<sup>119</sup> were coordinated by FILIPOVIĆ<sub>(DB)</sub>,<sup>120</sup> the Deputy Chief of the SerbianDB's 2<sup>nd</sup> Administration and SIMATOVIĆ's direct subordinate.<sup>121</sup> One of FILIPOVIĆ<sub>(DB)</sub>'s

<sup>105</sup> NIELSENChristian:P00850, para.104.

<sup>106</sup> 1D00147; NIELSENChristian:P00850, para.19; NIELSENChristian:T.50(14-Nov-2017).

<sup>107</sup> P02433, p.1; CVETKOVIĆVojislav:T.13(2-Sep-2020). See [REDACTED].

<sup>108</sup> [REDACTED]. See also P03029, p.6.

<sup>109</sup> [REDACTED].

<sup>110</sup> [REDACTED].

<sup>111</sup> E.g. [REDACTED]; BOGUNOVIĆNebojša:T.26-27(4-Sep-2019); [REDACTED].

<sup>112</sup> 1D00085, p.3.

<sup>113</sup> 1D00170, p.4.

<sup>114</sup> 1D00085, p.4.

<sup>115</sup> [REDACTED].

<sup>116</sup> 1D00085, p.4; [REDACTED].

<sup>117</sup> STEVANOVIĆObad:T.64-67(29-Sep-2020).

<sup>118</sup> Cross-reference Section II.F.5(b)(i); Section II.F.5(b)(iv)a.

<sup>119</sup> GREKULOVIĆSrđan:1D00409, para.6; GREKULOVIĆSrđan:1D00410, T.15215,15268-15269.

<sup>120</sup> GREKULOVIĆSrđan:1D00409, para.18; GREKULOVIĆSrđan:T.69(9-Oct-2019).

<sup>121</sup> P00860; [REDACTED]; P03195, p.5; DRAGICEVIĆVlado:T.34(17-Oct-2019). Cross-reference Section II.B.2.

subordinates was embedded with the SerbianJB-PJM commander to be “sure that the units carried out the tasks for which they were deployed in the first place.”<sup>122</sup>

51. Under the Accused and co-JCE member Radovan STOJČIĆ aka BADŽA, the SerbianDB and SerbianJB coordinated closely throughout the Indictment period. In 1991, STANIŠIĆ enjoyed authority over BADŽA by virtue of his *de facto* and *de jure* positions in the SMUP and the *vojna linija*, and his close relationship to MILOŠEVIĆ.<sup>123</sup> While BADŽA was installed as SAO-SBWS TO Commander, he played a comparable role to SIMATOVIĆ in Krajina: both were in the field assisting and equipping local Serbs to forcibly drive out the non-Serb population in pursuit of the CCP.<sup>124</sup> STANIŠIĆ directed events from Belgrade, as the link between MILOŠEVIĆ and BADŽA.<sup>125</sup> Notwithstanding their equivalent *de jure* positions as Assistant MUP Ministers from 31 December 1991, STANIŠIĆ remained “one step above BADŽA”,<sup>126</sup> and their coordination intensified as they used the resources and manpower of their respective services to pursue the CCP together.<sup>127</sup> BADŽA’s appointment as Deputy Minister of Interior in August 1993 had no apparent effect on this coordination or STANIŠIĆ’s dominance as MILOŠEVIĆ’s “most trusted strong man”.<sup>128</sup> While STANIŠIĆ and BADŽA directed resource allocations primarily from Belgrade, SIMATOVIĆ and his subordinates oversaw SerbianDB/SerbianJB cooperation for operations furthering the CCP on the ground in BiH and Croatia.<sup>129</sup>

(b) The SerbianDB was the ideal organ through which to covertly pursue the CCP

52. Legally and operationally equipped to conduct covert operations, the SerbianDB was the perfect mechanism through which the JCE members could conceal Serbia’s involvement in the CCP unfolding across its borders.

<sup>122</sup> GREKULOVIĆSrdan: [1D00410](#), T.15227,15232-15233,15253-15254; GREKULOVIĆSrdan:T.2-3(10-Oct-2019).

<sup>123</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>124</sup> Cross-reference Section [II.E.4\(a\)\(i\)](#); Section [II.F.1\(b\)\(i\)-\(iii\)](#); Section [II.F.1\(c\)\(ii\)](#); Section [II.F.2\(c\)](#).

<sup>125</sup> ANASTASIJEVIĆDejan:[P02423](#), para.81,92; VASILJEVIĆAleksandar:T.21-22(6-Feb-2019); BOGUNOVIĆBorislav:[P02718](#), para.82-83; BOGUNOVIĆBorislav:[P02719](#), para.18; BOGUNOVIĆBorislav:[P02720](#), T.5972-5974,6043,6045-6047,6061-6063; [REDACTED].

<sup>126</sup> VASILJEVIĆAleksandar:[P02687](#); [REDACTED]; MILOVANOVIĆManojlo:[P02934](#), T.4384-4385.

<sup>127</sup> Cross-reference Section [II.F.2\(c\)\(iii\)](#); Section [II.F.2\(f\)](#); Section [II.F.5\(b\)\(i\)](#); Section [II.F.5\(b\)\(iv\)a](#).

<sup>128</sup> E.g. [1D01346](#), p.2; ROBERTSIvor:T.17-19,60(15-Oct-2019); [REDACTED]; [P03155](#), p.2. Cross-reference Section [II.F.5\(a\)\(iii\)](#); Section [II.F.5\(b\)\(ii\)a](#); Section [II.F.5\(b\)\(iv\)](#).

<sup>129</sup> Cross-reference Section [II.F.5\(b\)\(i\)](#), (ii)-(v).



53. The SerbianDB's institutional principles of secrecy and subordination enabled JCE members to conceal their role in establishing, training, arming, and deploying Serb forces to further the CCP. As MILOŠEVIĆ explained to his co-JCE members, "you must understand that we must assist you in this way, via the state security service, because it works in a specific clandestine way, and that's why we can't help you, assist you, through the public security service."<sup>130</sup> Within the SerbianDB infrastructure, SerbianDB collaborators, operatives, and personnel exchanged information on a strictly "need to know" basis and could remain unaware of one another's activities and in some cases affiliation to the SerbianDB.<sup>131</sup>

54. [REDACTED].<sup>132</sup> [REDACTED],<sup>133</sup> further securing its already clandestine operations in establishing the Unit.<sup>134</sup>

55. Deploying an operative outside of Serbia would involve such a high level of secrecy "that the whole affair [would be] mentioned as rarely as possible, even within the Service",<sup>135</sup> and would likely not be reflected in a personnel file,<sup>136</sup> thus concealing the Accused's activities in Croatia and BiH. In the SerbianDB's own records, false secondments were manufactured to hide the involvement of the Unit and other SerbianDB personnel in activities furthering the CCP outside of Serbia.<sup>137</sup>

56. Outside of the SerbianDB, almost no information on the SerbianDB's work or organisation was available.<sup>138</sup> The SerbianDB was designed to operate covertly to erase traces of their existence and, generally speaking, to deny their engagement in activities.<sup>139</sup> During the Indictment period, the SerbianDB [REDACTED],<sup>140</sup> [REDACTED],<sup>141</sup>

<sup>130</sup> BABIĆ Milan: [P01246](#), T.13249-13251.

<sup>131</sup> [REDACTED]; CVETKOVIĆ Vojislav: T.18(1-Sep-2020); CVETKOVIĆ Vojislav: T.29(2-Sep-2020); [REDACTED]; NIELSEN Christian: T.35-36(21-Nov-2017); NIELSEN Christian: T.61(22-Nov-2017); MILOŠEVIĆ Milan: T.33-34(25-Feb-2020); STEVANOVIĆ Obrad: T.68(29-Sep-2020).

<sup>132</sup> [REDACTED].

<sup>133</sup> [REDACTED]; NIELSEN Christian: [P00850](#), para.98,101.

<sup>134</sup> [P00256](#), p.10.

<sup>135</sup> MILOŠEVIĆ Milan: T.33(25-Feb-2020).

<sup>136</sup> MILOŠEVIĆ Milan: T.33-34(25-Feb-2020).

<sup>137</sup> [P00831](#), p.50; [P02297](#), p.19; [REDACTED]; NIELSEN Christian: [P00850](#), para.86; NIELSEN Christian: T.47-48(14-Nov-2017); [REDACTED]; [P02295](#), p.11-14; RFJ-150: T.29-32(22-May-2018); [REDACTED].

<sup>138</sup> See NIELSEN Christian: [P00850](#), para.40; ANASTASIJEVIĆ Dejan: [P02423](#), para.70.

<sup>139</sup> NIELSEN Christian: T.41(21-Nov-2017). See [REDACTED]; [P00006](#), p.18-19; [REDACTED]. See also [REDACTED]; ANASTASIJEVIĆ Dejan: [P02423](#), para.167-169; [P02437](#); [P02438](#).

<sup>140</sup> [REDACTED]; RFJ-153: T.54-55(14-Jun-2017); [REDACTED]; ANASTASIJEVIĆ Dejan: [P02423](#), para.33,67; [REDACTED]. See also [REDACTED].

<sup>141</sup> [REDACTED].

concealing its role in furthering the CCP. While these attributes are undoubtedly typical of all intelligence services, the Accused could exploit these characteristics to ensure only those directly involved in the CCP knew of the SerbianDB's contributions.<sup>142</sup>

(c) The Accused's positions in the SerbianDB gave them unrivalled access to information, which they channeled to other JCE members to further the CCP

57. The SerbianDB under **STANIŠIĆ** from 1991 to 1995 was an effective and professional information-gathering machine that guaranteed the Accused were among the best informed individuals in the former Yugoslavia.<sup>143</sup> The Accused established SerbianDB posts outside of Serbia<sup>144</sup> and used operative and technical measures to gather information, including surveillance, telephone monitoring, radio interception and other forms of reconnaissance.<sup>145</sup>

58. The Accused cultivated what **SIMATOVIĆ** called a "big web of informers".<sup>146</sup> By embedding SerbianDB operatives in key positions and engaging collaborators and connections outside Serbia<sup>147</sup>—the identity of whom were known only to the SerbianDB operative and SerbianDB Chief<sup>148</sup>—the Accused received information to influence events in Serb-claimed territories, in furtherance of the CCP. They established parallel lines reporting to SMUP and SerbianDB organs from the Serb statelets, including: SAO-Krajina-DB, SAO-SBWS-DB, RSK-DB, RS-MUP, and the MILOŠ, Tajfun, and Sigma intelligence groups linked to the RS-SNB.<sup>149</sup> By 1993, the VRS and its security organ regularly reported to **STANIŠIĆ** and **SIMATOVIĆ**<sup>150</sup> regarding events across RS and RSK,<sup>151</sup> and by 1994 from the SVK relating to operations around western BiH.<sup>152</sup>

<sup>142</sup> [P00256](#), p.9; NIELSENChristian:T.16-17(15-Nov-2017); NIELSENChristian:T.40-41(21-Nov-2017); ANASTASIJEVIĆDejan:T.26(13-Jun-2018).

<sup>143</sup> See MILOŠEVIĆMilan:T.42-43(25-Feb-2020). See also MILOVANOVIĆManojlo:[P02934](#), T.4385.

<sup>144</sup> [REDACTED]; DERONJIĆMiroslav:[P01717](#), para.144; DERONJIĆMiroslav:[P01719](#), T.29790-29791; KARANMladen:T.53-54(28-Jan-2020); NOVAKOVIĆRadenko:T.32,34,43-44(18-Sep-2019); NOVAKOVIĆRadenko:T.12(17-Sep-2019).

<sup>145</sup> [P00006](#), p.8-11; MILOŠEVIĆMilan:[2D00451](#), para.333; NOVAKOVIĆRadenko:T.34,43-44(18-Sep-2019); [REDACTED]; NIELSENChristian:[P00850](#), para.126.

<sup>146</sup> [REDACTED]. See [P03194](#), p.5.

<sup>147</sup> [REDACTED]; MIĆIĆRadivoje:T.46-47(3-Mar-2020); [REDACTED]. See [P00006](#), para.6-16,60; [REDACTED]; RFJ-153:T.3-5(15-Jun-2017); RFJ-153:T.25-29,33(14-Jun-2017).

<sup>148</sup> [REDACTED]; RFJ-153:T.28-29(14-Jun-2017); RFJ-153:T.4-5(15-Jun-2017).

<sup>149</sup> Cross-reference Section [II.D.1\(b\)](#); Section [II.F.1\(b\)\(i\)b](#); Section [II.F.2\(b\)](#); Section [II.F.3\(b\)](#); Section [II.F.4\(a\)\(i\)b](#).

<sup>150</sup> The handwritten markings on the documents cited in following footnotes—numeral "II" for 2<sup>nd</sup> Administration, initials of **SIMATOVIĆ** and/or Dragan FILIPOVIĆ<sub>(DB)</sub> (compare to [REDACTED]);

59. [REDACTED].<sup>153</sup> Through the *vojna linija*, transformation of the JNA, and the SerbianDB's gradual assumption of FSUP responsibilities and authority, he had largely consolidated intelligence within the SerbianDB by mid-1992.<sup>154</sup>

60. [REDACTED].<sup>155</sup> [REDACTED].<sup>156</sup> [REDACTED].<sup>157</sup>

61. The Accused used their technical expertise to facilitate their collaboration with co-JCE members as they jointly planned and pursued the CCP. [REDACTED].<sup>158</sup>

### C. Prominent Serb leaders within the political, military, police/security, and paramilitary structures in Serbia, Croatia, and BiH furthered the CCP

62. **STANIŠIĆ** and **SIMATOVIĆ** were in a JCE with other individuals holding powerful positions within key Serb government, police, security and/or paramilitary organs in Serbia and the breakaway Serb statelets in BiH and Croatia. The key JCE members discussed below, and other JCE members among the Serb Forces, significantly contributed to the CCP, sharing the intent for the crimes it entailed.<sup>159</sup> The JCE members implemented the CCP using Serb Forces whose crimes are attributable to JCE members because the forces were either under the JCE members' control, or acted together and in concert with those under their control.<sup>160</sup>

63. Under the leadership of Serbian President Slobodan MILOŠEVIĆ, the Belgrade JCE members—most notably **STANIŠIĆ** and **SIMATOVIĆ**—established the necessary conditions for, and largely oversaw, the CCP's implementation. Belgrade JCE members subverted and/or marginalised institutions they initially did not control, such as the JNA

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[REDACTED]), and/or "Jovica's folder" notation—demonstrate that these were sent to and received by both Accused. *See* AnnexF.

<sup>151</sup> *E.g.* [P03637](#), p.1,8; [P03166](#); [P02941](#); [P03618](#); [P03669](#); [P03673](#); [P3674](#); [P03678](#); [P03679](#); [P03680](#); [P03661](#); [P03662](#); [P03663](#).

<sup>152</sup> [P02951](#); [REDACTED]; [P02952](#); [P03458](#); [P03459](#); [P03460](#).

<sup>153</sup> [REDACTED].

<sup>154</sup> *Cross-reference* Section [II.E.1\(a\)](#), (c), (c).

<sup>155</sup> [REDACTED]; MILOŠEVIĆMilan:T.45(25-Feb-2020). *See also* MILOŠEVIĆMilan:[2D00451](#), para.201.

<sup>156</sup> [REDACTED].

<sup>157</sup> [REDACTED].

<sup>158</sup> [REDACTED]; [P02349](#), p.1,3; [REDACTED]; [P01491](#); [REDACTED]; [P02780](#), p.1; [REDACTED]; [P03393](#); [P03183](#), p.18; [REDACTED]; [P00218](#); [P00047](#), p.1-2; [REDACTED]; BABIĆMilan:[P01246](#), T.12955; [P02872](#), p.3; [P00859](#), p.6; [P03219](#), p.5; [REDACTED]; [P03028](#), p.4; NIELSENChristian:[P00850](#), para.464; [P03423](#); [P03404](#).

<sup>159</sup> Indictment, para.12.

<sup>160</sup> *Martić* AJ, para.187-188,195.

and FSUP; trained, armed and financed Serb Forces; and enabled the creation of parallel Serb structures in Croatia and BiH.

64. Other JCE members were based in Croatia and BiH, frequently traveling to Belgrade to receive direction and support. Guided and supported by the Belgrade JCE leadership, these JCE members exercised authority over the structures they controlled to ensure the CCP's success.

65. Each named JCE member's role, positions, key contributions, shared intent, and, where applicable, control over perpetrator groups, are set out below. Together, these JCE members are responsible for murdering, persecuting, forcibly transferring, and deporting thousands of non-Serbs from Croatia and BiH from April 1991 through December 1995.

### 1. Slobodan MILOŠEVIĆ

66. MILOŠEVIĆ was the JCE's visionary and leader. President of the Republic of Serbia, he controlled all Serbian institutions and forces,<sup>161</sup> including the SMUP (SerbianDB and SerbianJB),<sup>162</sup> Ministry of Defence (encompassing the SerbianTO)<sup>163</sup> and media.<sup>164</sup> In addition to his *de jure* authority, he assumed *de facto* control over Federal (SFRY and later FRY<sup>165</sup>) institutions such as the JNA,<sup>166</sup> FSUP, and National Bank of Yugoslavia, even while the federal bodies officially retained supremacy over the Serbian Republican institutions.<sup>167</sup> Regarded as the leader and protector of all ethnic Serbs dispersed across Yugoslavia,<sup>168</sup> MILOŠEVIĆ also exercised extraordinary

<sup>161</sup> ROBERTSIvor:[1D00430](#), para.60; ROBERTSIvor:T.11-13(15-Oct-2019); ROBERTSIvor:T.71(15-Oct-2019).

<sup>162</sup> ROBERTSIvor:T.39-40(15-Oct-2019); [P02433](#), p.1; CVETKOVIĆVojislav:T.13(2-Sep-2020); ANASTASIJEVIĆDejan:[P02423](#), para.30,64,70; ANASTASIJEVIĆDejan:T.39-41(20-Jun-2018). See [REDACTED].

<sup>163</sup> BABIĆMilan:[P01248](#), T.1460-1462; [P03096](#), p.1-4; [P00055](#), p.1-12; [P03276](#); [P03316](#), p.4; ANASTASIJEVIĆDejan:[P02423](#), para.31.

<sup>164</sup> [REDACTED]; [1D00437](#), p.1; ROBERTSIvor:T.37-38,40-41,45-47(15-Oct-2019); ANASTASIJEVIĆDejan:[P02423](#), para.17-19,24; ANASTASIJEVIĆDejan:T.9-10(13-Jun-2018); LUČIĆDejan:T.28-29(12-Nov-2019); ROBERTSIvor:[1D00430](#), para.33; BABIĆMilan:[P01246](#), T.12883,13002-13007; BABIĆMilan:[P01248](#), T.1467-1472; [REDACTED]; BABIĆMilan:[P01244](#), para.10; BABIĆMilan:[P01243](#), p.11; [REDACTED].

<sup>165</sup> See e.g. BABIĆMilan:[P01246](#), T.13700-13701; ANASTASIJEVIĆDejan:[P02423](#), para.139-140; ROBERTSIvor:T.77(15-Oct-2019); ROBERTSIvor:[1D00430](#), para.49.

<sup>166</sup> BABIĆMilan:[P01246](#), T.13130-13132.

<sup>167</sup> ROBERTSIvor:T.11-13,71,75(15-Oct-2019); ROBERTSIvor:[1D00430](#), para.60; [REDACTED]; BABIĆMilan:[P01246](#), T.12970-12971,12975-12976,13009,14046-14048; ANASTASIJEVIĆDejan:[P02423](#), para.27-28,30,34,44,66.

<sup>168</sup> BABIĆMilan:[P01246](#):T.12915,13004-13005; BABIĆMilan:[P01243](#), p.14; BABIĆMilan:[P01248](#), T.1475; ROBERTSIvor:[1D00432](#), p.20-21; [P00243](#)(00:00:00-00:00:17), p.1.

influence over JCE members and Serb structures in Croatia and BiH,<sup>169</sup> and facilitated paramilitaries' activities there.<sup>170</sup>

67. MILOŠEVIĆ's control over key institutions within and outside of Serbia was prerequisite to the JCE's success. He "pulled the strings" regardless of his lack of legal authority, reorganised institutions, created parallel structures and cultivated employees who were loyal to him, ensuring a strict hierarchy of power to efficiently advance the CCP.<sup>171</sup> Through the institutions he controlled, he contributed forces and financial, military, and logistical resources to be used in the charged murders, persecutions, and displacement of non-Serbs across Krajina, SBWS and Serb-targeted parts of BiH, during the entire Indictment period,<sup>172</sup> taking care to conceal Serbia's involvement.<sup>173</sup> MILOŠEVIĆ spearheaded the strategic political and military planning for all Serb territories, instructing his regional co-JCE members accordingly.<sup>174</sup> International negotiators knew it was essential to have him on side to resolve issues of importance, and he manipulated political processes to further the CCP.<sup>175</sup>

68. MILOŠEVIĆ embraced violent Serb nationalism and promoted ethnic cleansing as a means of retaining power and establishing Serb "statelets", "setting Croatia and BiH ablaze" in the process.<sup>176</sup> He was well-informed about persecutory attacks and crimes

<sup>169</sup> Cross-reference Section II.A; Section II.E.1; Section II.E.2(b); Section II.F.1(a); Section II.F.1(c)(i); Section II.F.2(a); Section II.F.3(a)-(b); Section II.F.4(a). See e.g. BABIĆ: BABIĆMilan:P01243, para.14; BABIĆMilan:P01246, T.12912-12914; BABIĆMilan:P01243, para.26; HADŽIĆ: BOGUNOVIĆBorislav:P02720, T.5972-5974; BOGUNOVIĆBorislav:P02718, para.82-83; BOGUNOVIĆBorislav:P02719, para.15,18; SAVIĆBorivoje:P00449, para.82; KARADŽIĆ: P03704; P01440, p.1-2; P01472(18-Sep-1991); P01449.

<sup>170</sup> BABIĆMilan:P01246, T.13505-13508; [REDACTED]; ROBERTSIvor:T.36(15-Oct-2019); ANASTASIJEVIĆDejan:P02423, para.42; ID00123; P02431, p.1.

<sup>171</sup> Cross-reference Section II.E.1. ROBERTSIvor:T.11-13,71,75(15-Oct-2019); ROBERTSIvor:ID00430, para.47,60; ANASTASIJEVIĆDejan:P02423, para.29.

<sup>172</sup> See e.g. BABIĆMilan:P01246:T.12976,13093-13094,13591; P02439, p.1-2; ANASTASIJEVIĆDejan:P02423, para.20,22-23; ANASTASIJEVIĆDejan:T.11-12(13-Jun-2018); ROBERTSIvor:T.36(15-Oct-2019).

<sup>173</sup> Cross-reference Section II.A(2)(c); Section II.B.3(b); Section II.E.3; Section II.F.1.(a)(ii); Section II.F.4(a)(i)-(ii)(a); Section II.F.5. See e.g. BABIĆMilan:P01243, para.23; BABIĆMilan:P01246, T.13116,13175-13176,14067-14068; [REDACTED]; BABIĆMilan:P01248, T.1414-1415.

<sup>174</sup> Cross-reference Section II.F.1(a); Section II.F.2(a); Section II.F.3(a)-(b); Section II.F.4(a). See e.g. BABIĆ: BABIĆMilan:P01246, T.13092-13094,13100-13101,13608,13654,13985; [REDACTED]; P01313; [REDACTED]; HADŽIĆ: BOGUNOVIĆBorislav:P02720, T.6043,6045-6047,6061-6062; [REDACTED]; KARADŽIĆ: P01448(1-Jul-1991); P03709; P02880(19-Sep-1991); [REDACTED]; P01995.

<sup>175</sup> [REDACTED]; WILSONJohn:T.14-15(27-Jun-2017); WILSONJohn:T.44(28-Jun-2017); ROBERTSIvor:ID00429, para.4-6; ROBERTSIvor:T.5,55,65-66(15-Oct-2019); [REDACTED]; ID00430, para.57; ID01340, p.48.

<sup>176</sup> ROBERTSIvor:T.5,10-12,20-24,53-55,59,67(15-Oct-2019); [REDACTED]; ROBERTSIvor:ID00430, para.44,48.

Serb Forces committed to achieve the CCP,<sup>177</sup> never expressing regret for the criminal campaign he set in motion.<sup>178</sup>

## 2. Radmilo BOGDANOVIĆ

69. Radmilo BOGDANOVIĆ's role was to engage paramilitaries and arm Serb Forces who would be used to commit crimes furthering the CCP. A close associate of MILOŠEVIĆ, BOGDANOVIĆ was the SMUP Minister until 30 May 1991,<sup>179</sup> and continued to play a dominant role and exercise influence over key persons in the SMUP until 1995.<sup>180</sup> During this time, BOGDANOVIĆ's various other positions included Deputy in Serbia's and FRY's Assembly and President of the Serbian Assembly's Board for Relations with the Serbs outside of Serbia.<sup>181</sup> Beyond his *de jure* positions, from 1990-1992 BOGDANOVIĆ was a key figure in MILOŠEVIĆ's informal power structures (*vojna linija* and Krajina "parallel structure"), which JCE members used to stir ethnic tensions and later execute the CCP in Croatia and BiH.<sup>182</sup> BOGDANOVIĆ worked closely with STANIŠIĆ to arm Serbs in Krajina,<sup>183</sup> SBWS<sup>184</sup> and BiH,<sup>185</sup> ensuring Serb Forces were sufficiently armed to carry out the CCP in their subsequent persecutory attacks.<sup>186</sup> BOGDANOVIĆ was a key intermediary with Serbian paramilitary groups,<sup>187</sup>

<sup>177</sup> See e.g. WILSONJohn:T.13-14(27-Jun-2017); [REDACTED]; BABIĆMilan:P01246, T.13181,13650-13651; [REDACTED]; KRALJEVIĆStipan:T.14-15,23(22-Aug-2018); P03099; P03279, p.4-5;; NIELSENChristian:T.26-29(23-Nov-2017); P00104, p.1-2; P02960, p.5,16; P01599, p.20-22; DONIARobert:T.56-57(30-Jan-2018).

<sup>178</sup> ROBERTSIvor:ID00432, p.34; ROBERTSIvor:T.65-67(15-Oct-2019); [REDACTED].

<sup>179</sup> P02975, p.3-4; BABIĆMilan:P01248, T.1391; VASILJEVIĆAleksandar:T.7(30-Jan-2019); ANASTASIJEVIĆDejan:P02423, para.38,62-63,144; ANASTASIJEVIĆDejan:T.46(14-Jun-2018); P00570, p.1-2,4,13; P00004(00:15:42-00:15:55)(00:31:58-00:33:15), p.7,14; P00852, p.7; [REDACTED]; P03246; P00209, p.3; P03248, p.3; P00522, p.22; [REDACTED].

<sup>180</sup> P00004(00:31:52-00:33:30), p.14; [REDACTED]; VASILJEVIĆAleksandar:T.7,13-14(30-Jan-2019); VASILJEVIĆAleksandar:P02694, T.15860-15862; [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.63-64; ANASTASIJEVIĆDejan:T.46,53,60(14-Jun-2018); P00570, p.3; P00485, p.3.

<sup>181</sup> 2D00738; P00570, p.1,3; SAVIĆBorivoje:P00449, para.160; VASILJEVIĆAleksandar:T.45-46(31-Jan-2019); [REDACTED]; NOVAKOVIĆStojan:T.17-18(6-Oct-2020).

<sup>182</sup> Cross-reference Section II.E.1(a). [REDACTED]; BABIĆMilan:P01248, T.1391; RFJ-017:P02685, T.15884; RFJ-017:P02686, T.15885-15886; [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.38,63; ANASTASIJEVIĆDejan:T.54-55,60(14-Jun-2018); P00852, p.8.

<sup>183</sup> Cross-reference Section II.E.3(a)(iv)a. See e.g. [REDACTED]; [REDACTED]; BABIĆMilan:P01248, T.1526-1528,1575; BABIĆMilan:P01246, T.13104,13503,13505; P02453; [REDACTED]; P00570, p.3-4; P00242; P00852, p.7-8.

<sup>184</sup> Cross-reference Section II.E.3(a)(iv)b. See e.g. [REDACTED]; RFJ-017:T.6-7,14(30-Jan-2019); P00485, p.3; SAVIĆBorivoje:T.59-60(12-Sep-2017).

<sup>185</sup> Cross-reference Section II.E.3(a)(iv)c. See e.g. P01734, p.35-36,41.

<sup>186</sup> Cross-reference Section II.E.3(a)(iv).

<sup>187</sup> Cross-reference Section II.D.2(b)(i)-(ii). P01962, p.2; [REDACTED]; P00852, p.7-8.



and his promise to “give” ARKAN to SBWS Serbs in 1991, was understood to foreshadow “physical liquidations”.<sup>188</sup>

### 3. *Mihalj KERTES aka BRACO/BRACA*

70. Mihalj KERTES aka “Braco”/“Braca”<sup>189</sup>—“MILOŠEVIĆ’s man”<sup>190</sup> and so-called “Minister for Arming the People”<sup>191</sup>—played a key role in financing<sup>192</sup> and arming the Serb forces used by JCE members to further the CCP in Croatia<sup>193</sup> and BiH.<sup>194</sup> A trusted friend and special envoy of MILOŠEVIĆ, with close ties to STANIŠIĆ,<sup>195</sup> KERTES was Deputy in the Serbian National Assembly in 1990 to 1991,<sup>196</sup> and part of the *vojna linija*.<sup>197</sup> He was installed by MILOŠEVIĆ as FSUP Assistant Minister and FederalDB Chief in April 1992,<sup>198</sup> despite his inexperience in state security,<sup>199</sup> so he could “cleanse[]” the FSUP of people who were not Serb or Montenegrin, and facilitate the SDB’s takeover of the FSUP.<sup>200</sup> Whilst KERTES was publicly removed from this position in August 1992 by FRY Prime Minister Milan PANIĆ, who suggested during international negotiations that he enabled ethnic cleansing,<sup>201</sup> MILOŠEVIĆ created a new position for KERTES as Minister without portfolio.<sup>202</sup> He subsequently became Director

<sup>188</sup> Cross-reference Section II.F(2)(f)(i). SAVIĆBorivoje:[P00449](#), para.161-163.

<sup>189</sup> BABIĆMilan:[P01246](#), T.13106; [REDACTED]; [1D00037](#), p.97; SAVIĆBorivoje:[P00449](#), para.169; [P00023](#), p.1.

<sup>190</sup> [REDACTED]. See SAVIĆBorivoje:T.49(12-Sep-2017); [REDACTED]; ANASTASIJEVIĆDejan:T.32(19-Jun-2018).

<sup>191</sup> [P01624](#), p.4. Cross-reference Section II.E.3(a)(ii).

<sup>192</sup> [REDACTED]; [P02435](#)(00:00:55-00:01:09); [P00059](#)(Clip 3, 00:47:10-00:47:18), p.49; VASILJEVIĆAleksandar:T.2-3,5-6(30-Jan-2019); See [P00485](#); ANASTASIJEVIĆDejan:[P02423](#), para.81.

<sup>193</sup> Cross-reference Section II.E.3(a)(iv)a-b. See e.g. SAVIĆBorivoje:T.63(13-Sep-2017); DERONJIĆMiroslav:[P01717](#), para.15; ANASTASIJEVIĆDejan:[P02423](#), para.81; BABIĆMilan:[P01246](#), T.13104,13106,13134,12136; [REDACTED]; BABIĆMilan:[P01248](#), T.1527-1528; [P02445](#), p.90; [REDACTED]; [REDACTED]; [P00485](#), p.7; VASILJEVIĆAleksandar:T.2-3(30-Jan-2019); [P01624](#), p.4; [P00482](#), p.1; [REDACTED].

<sup>194</sup> Cross-reference Section II.E.3(a)(iv)c. See e.g. [1D00042](#), p.3; [REDACTED]; DERONJIĆMiroslav:[P01717](#), para.11-28; DERONJIĆMiroslav:[P01718](#), T.950-958; DERONJIĆMiroslav:[P01726](#), p.20; [P01446](#); [REDACTED]; [P00023](#), p.3; [REDACTED].

<sup>195</sup> SAVIĆBorivoje:T.49(12-Sep-2017); [REDACTED]; BABIĆMilan:[P01246](#), T.13134,13136,13759; [REDACTED]; BABIĆMilan:[P01248](#), T.1528-1529; [REDACTED]; [P00023](#), p.1; [P01624](#), p.4; [P02435](#)(00:00:20-00:01:10).

<sup>196</sup> [P02444](#), p.2; [P02445](#), p.85; [P02814](#), p.11; [P01624](#), p.3-4; [P00023](#), p.3.

<sup>197</sup> Cross-reference Section II.E.1(a). VASILJEVIĆAleksandar:[P02686](#), T.15885-15886; [REDACTED]; [1D00123](#), p.1; [P00059](#)(Clip 1, 00:34:18-00:34:39), p.9-10.

<sup>198</sup> [REDACTED]; NIELSENChristian:[P00850](#), para.60; [REDACTED]; SAVIĆBorivoje:[P00449](#), para.80; ANASTASIJEVIĆDejan:[P02423](#), para.38; ANASTASIJEVIĆDejan:T.42(13-Jun-2018); [P00023](#), p.1,3-6; [P01624](#), p.4-5; [P03284](#), p.2; [REDACTED]; [P00570](#), p.4; [P02424](#), p.5; [P00852](#), p.8; [REDACTED].

<sup>199</sup> [REDACTED]

<sup>200</sup> Cross-reference Section II.E.1(c). See e.g. [P00023](#), p.1,6-7; [REDACTED]; [P02814](#), p.11.

<sup>201</sup> [P00023](#), p.1,3-6; [P02814](#), p.122-124; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.38; ANASTASIJEVIĆDejan:T.42(13-Jun-2018); [P01624](#), p.4-5; [REDACTED].

<sup>202</sup> [P02424](#), p.5; [P00023](#), p.1. See [REDACTED].

of the Federal Customs Administration from May 1994.<sup>203</sup> KERTES, whose self-proclaimed “obsession” was “for all Serbs to live in one State”,<sup>204</sup> promoted the vision that “everything would be Serbian, pure Serbian”,<sup>205</sup> and collaborated closely with STANIŠIĆ,<sup>206</sup> SIMATOVIĆ,<sup>207</sup> and other JCE members<sup>208</sup> in pursuit of this goal.

#### 4. Radovan STOJČIĆ aka BADŽA

71. A SMUP official, Radovan STOJČIĆ aka BADŽA’s primary role was to oversee Serb forces used to further the CCP, including forces operating under the SAO-SBWS TO umbrella in 1991, and SerbianJB forces from 1992 to 1995. Officially, BADŽA was a SMUP public security officer and commander of the SAJ in 1991,<sup>209</sup> while concurrently serving as SAO-SBWS TO Commander from autumn 1991.<sup>210</sup> MILOŠEVIĆ appointed BADŽA Assistant SMUP Minister and Chief of the SerbianJB from 31 December 1991,<sup>211</sup> then Deputy SMUP Minister, responsible for the SerbianJB, from 12 August

<sup>203</sup> [REDACTED]; SAVIĆBorivoje:P00449, para.78; P00023, p.1,3; P01624, p.5; P03284, p.2; P00059(Clip 3, 00:47:10-00:47:18), p.49; P02964, p.5; ANASTASIJEVIĆDejan:P02423, para.38; ANASTASIJEVIĆDejan:T.43(13-Jun-2018); [REDACTED].

<sup>204</sup> P00023, p.8. See P00485, p.7; SAVIĆBorivoje:T.59-60,64(12-Sep-2017); P01624, p.4.

<sup>205</sup> DERONJIĆMiroslav:P01717, para.17. See P01624, p.4; P02793, p.3.

<sup>206</sup> See e.g. [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.38,81; 1D00060; P00256(00:23:32-00:23:50), p.14; 1D00042, p.1-3.

<sup>207</sup> See e.g. [REDACTED]; P02793, p.3; P02441, p.3; ANASTASIJEVIĆDejan:P02423, para.38,154; P01624, p.4.

<sup>208</sup> See e.g. P01446; 1D00042; P02793, p.3; P00485, p.6-7; ANASTASIJEVIĆDejan:P02423, para.38,81; P01624, p.4; [REDACTED].

<sup>209</sup> BOGUNOVIĆBorislav:P02719, para.16; P01790, p.2; [REDACTED]; RFJ-083:T.8(8-May-2018); [REDACTED]; MILOVANOVIĆManojlo:P02935, T.15501; VASILJEVIĆAleksandar:P02693, T.15805; [REDACTED]; BOGUNOVIĆNebojša:T.14,23(4-Sep-2019); ANASTASIJEVIĆDejan:P02423, para.76-77,164; [REDACTED].

<sup>210</sup> Cross-reference Section II.F.2(c). [REDACTED]; VASILJEVIĆAleksandar:T.44,48-49(5-Feb-2019); VASILJEVIĆAleksandar:T.22(6-Feb-2019); VASILJEVIĆAleksandar:T.43-44(31-Jan-2019); SAVIĆBorivoje:P00449, para.175; SAVIĆBorivoje:T.65(13-Sep-2017); NIELSENChristian:P00850, para.E37; THEUNENSReynaud:T.51-52(7-Mar-2018); P01976, p.3; BABIĆMilan:P01246, T.13230; [REDACTED]; BOGUNOVIĆNebojša:T.38(3-Sep-2019); [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.84,164; ANASTASIJEVIĆDejan:T.64,67(14-Jun-2018); P02047, p.1; BOGUNOVIĆBorislav:P02720, T.5989,6013-6014; P02434, p.4; P00457, p.1; P01193, p.14; 2D00106, p.1-2.

<sup>211</sup> P03249, p.5; VASILJEVIĆAleksandar:T.57(30-Jan-2019); VASILJEVIĆAleksandar:P02700, T.16064; VASILJEVIĆAleksandar:T.29-30(6-Feb-2019); VASILJEVIĆAleksandar:T.6-7,14-15(31-Jan-2019); [REDACTED]; P03196, p.1; NIELSENChristian:P00850, para.E12,E37,105; P01787; ANASTASIJEVIĆDejan:P02423, para.76; ANASTASIJEVIĆDejan:T.67(14-Jun-2018); RFJ-150:T.34(23-May-2018); P02434, p.1; [REDACTED].



1993.<sup>212</sup> His *de facto* authority in SAO-SBWS derived from his status as a trusted *vojna linija* member.<sup>213</sup>

72. MILOŠEVIĆ dispatched BADŽA to SAO-SBWS as “commander [REDACTED] responsible for civil and military affairs,<sup>214</sup> to oversee, organise, train, arm, and equip the SAO-SBWS police and TO.<sup>215</sup> BADŽA commanded the SAO-SBWS TO in joint operations, violently expelling non-Serbs from SBWS from September to December 1991.<sup>216</sup> BADŽA and the SMUP personnel under his control actively engaged in crimes against the non-Serb population.<sup>217</sup> In addition, BADŽA exercised field command over ARKAN, with whom he was “like minded”,<sup>218</sup> and the SDG,<sup>219</sup> and enabled their crimes.<sup>220</sup> As SerbianJB Chief, BADŽA coordinated with STANIŠIĆ and other JCE members,<sup>221</sup> using SerbianJB units and resources, *inter alia* for criminal operations in the Podrinje in 1993 and Sanski Most in 1995.<sup>222</sup>

<sup>212</sup> [P03255](#), p.1; NIELSENChristian:[P00850](#), para.108; MILOVANOVIĆManojlo:[P02934](#), T.4532; [REDACTED].

<sup>213</sup> Cross-reference Section [II.B.3\(a\)](#); Section [II.E.1\(a\)](#). VASILJEVIĆAleksandar:[P02686](#), T.15885-15886; VASILJEVIĆAleksandar:[P02700](#), T.16062-16064; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.38,84,164; [ID00123](#), p.1-2. See VASILJEVIĆAleksandar:T.57(30-Jan-2019); VASILJEVIĆAleksandar:T.6-9,14-15(31-Jan-2019); [REDACTED]; SAVIĆBorivoje:[P00449](#), para.175; [REDACTED]; BOGUNOVIĆBorislav:[P02719](#), para.15-16,18,23; BOGUNOVIĆBorislav:[P02720](#), T.6061-6062; BOGUNOVIĆBorislav:[P02718](#), para.73.

<sup>214</sup> [REDACTED]; See BOGUNOVIĆBorislav:[P02718](#), para.73,78; VASILJEVIĆAleksandar:[P02693](#), T.15806; VASILJEVIĆAleksandar:T.43(31-Jan-2019); [REDACTED].

<sup>215</sup> Cross-reference Section [II.F.2\(c\)](#). See e.g. [REDACTED]; BOGUNOVIĆNebojša:T.11-14(4-Sep-2019); BOGUNOVIĆNebojša:T.41,44(3-Sep-2019); [REDACTED]; BOGUNOVIĆBorislav:[P02718](#), para.13,23,73; [REDACTED]; VASILJEVIĆAleksandar:T.16-17(5-Feb-2019); [P02434](#), p.3-4; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.81,92; [P01624](#), p.4; [REDACTED].

<sup>216</sup> Cross-reference Section [II.F.2\(e\)](#); Section [II.F.2\(h\)](#). See e.g. [P03098](#); [REDACTED]; BOGUNOVIĆBorislav:[P02718](#), para.23,73; BOGUNOVIĆBorislav:[P02720](#), T.6012-6013; VASILJEVIĆAleksandar:[P02693](#), T.15805-15806; VASILJEVIĆAleksandar:[P02691](#), T.15971; [REDACTED] VASILJEVIĆAleksandar:T.48-49(5-Feb-2019); VASILJEVIĆAleksandar:T.58-59(30-Jan-2019); ANASTASIJEVIĆDejan:T.64-66(14-Jun-2018); [REDACTED]; SAVIĆBorivoje:[P00449](#), para.175; [REDACTED].

<sup>217</sup> Cross-reference Section [III.B.2\(b\)\(ii\)](#); Section [III.B.2\(c\)](#). See e.g. [REDACTED].

<sup>218</sup> Cross-reference Section [II.D.2\(b\)\(i\)](#); Section [II.F.2\(f\)\(i\)](#). [REDACTED]. See also BOGUNOVIĆBorislav:[P02719](#), para.23; BOGUNOVIĆBorislav:[P02720](#), T.5988-5989; [REDACTED].

<sup>219</sup> [REDACTED]; DIMITRIJEVIĆJovan:T.6(12-Feb-2020); VASILJEVIĆAleksandar:T.22-25(6-Feb-2019); VASILJEVIĆAleksandar:T.38(5-Feb-2019); BOGUNOVIĆBorislav:[P02719](#), para.22; [REDACTED]; KARANMladen:T.52-53(29-Jan-2020); [REDACTED].

<sup>220</sup> Cross-reference Section [II.D.2\(b\)\(ii\)](#); Section [II.F.2\(f\)\(i\)](#); Section [III.B.2\(b\)\(ii\)](#); Section [III.B.2\(c\)](#). VASILJEVIĆAleksandar:T.34-35,38(5-Feb-2019); VASILJEVIĆAleksandar:T.23-25(6-Feb-2019); [REDACTED]; [P00793](#)(00:00:11-00:00:19); [REDACTED].

<sup>221</sup> See e.g. [ID00036](#), p.53-58; [P02890](#), p.233-236; [REDACTED]; VASILJEVIĆAleksandar:T.10-11(31-Jan-2019); VASILJEVIĆAleksandar:T.17,38,48(5-Feb-2019); VASILJEVIĆAleksandar:T.7-8(6-Feb-2019); [REDACTED]; BOGUNOVIĆBorislav:[P02720](#), T.5995-5997,6062; BOGUNOVIĆBorislav:[P02718](#), para.73; BOGUNOVIĆBorislav:[P02719](#), para.14-16,18; BABIĆMilan:[P01246](#), T.13230; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.81,84,92.

<sup>222</sup> Cross-reference Section [II.D.2\(a\)\(iv\)](#)(b); Section [II.F.4\(b\)\(iv\)](#); Section [II.F.5\(b\)\(iv\)](#).

## **5. Željko RAŽNATOVIĆ aka ARKAN**

73. A notorious criminal even before the conflict,<sup>223</sup> Željko RAŽNATOVIĆ aka ARKAN, and the SDG he commanded, committed many of the charged crimes to further the CCP. He was the founder and commander of the SDG, or “Arkan’s Tigers”/“*Arkanovci*”, which operated in Croatia and BiH under the authority of the SMUP, in particular STANIŠIĆ and SIMATOVIĆ.<sup>224</sup> In October 1990, ARKAN used his position as the leader of the Red Star football club’s fans (the *Delijes*)<sup>225</sup> to form the Serb paramilitary force that would become the SDG to “defend the Serb people”.<sup>226</sup> ARKAN used his house in Belgrade as a SDG headquarters, and he recruited and trained the SDG within Serbia.<sup>227</sup> With the SerbianDB’s support, ARKAN established, maintained and later expanded a SDG base and training centre in Erdut, SBWS, which he used during the Indictment period to arm and train Serb forces as needed for operations to further the CCP.<sup>228</sup> From their initial deployment into SAO-SBWS in mid-1991, under the SMUP’s patronage, through the end of 1995, ARKAN led the SDG in committing heinous crimes against non-Serbs in Croatia and BiH.<sup>229</sup> ARKAN led by example, personally murdering and torturing non-Serbs.<sup>230</sup>

74. A fervent Serb nationalist,<sup>231</sup> ARKAN made no attempt to hide his shared intent for the CCP. In addition to his own crimes against non-Serbs, he advocated using violence to resolve the issues facing the former Yugoslavia and argued against reaching a truce.<sup>232</sup> He instructed the SDG, “[w]hen you see a living person, open fire immediately”, and publicly boasted about “hundreds” of the SDG’s murders.<sup>233</sup> During his training, volunteers learned that when they raided a Croatian house, they should “kill whomever

<sup>223</sup> [P00020](#), p.2-6; STEVANOVIĆObrad:T.9(30-Sep-2020); SAVIĆBorivoje:T.68(12-Sep-2017); GREKULOVIĆŠrdan:[1D00410](#), T.15275; [REDACTED]; [P02431](#); [P02429](#), p.2.

<sup>224</sup> Cross-reference Section [II.D.2\(b\)](#); [REDACTED]; [P03027](#); [REDACTED].

<sup>225</sup> [REDACTED].

<sup>226</sup> NOVAKOVIĆStojan:T.11-13,25-26(6-Oct-2020); [REDACTED]; [P03856](#). See SAVIĆBorivoje:[P00449](#), para.70; [P00486](#), p.1-2.

<sup>227</sup> [P03136](#), p.2; [REDACTED]; [REDACTED][P01083](#), p.7.

<sup>228</sup> Cross-reference Section [II.D.2\(b\)\(i\)](#); Section [II.F.2\(f\)\(i\)](#); [P00491](#); [2D00151](#); [REDACTED].

<sup>229</sup> Cross-reference Section [II.F.2\(f\)\(i\)](#); Section [II.F.4\(b\)\(i\)](#); Section [II.F.4\(b\)\(ii\)b](#); Section [II.F.4\(a\)\(ii\)c](#); Section [III.B.2\(c\)-\(d\)](#); Section [III.C.1-2,6](#).

<sup>230</sup> Cross-reference Section [III.B.2\(c\)\(i\)](#)a-b. See e.g. [P00762](#), p.3.

<sup>231</sup> [P02430](#); ANASTASIJEVIĆDejan:[P02423](#), para.146; [P00061](#)(00:00:00-00:04:22), p.1; [REDACTED].

<sup>232</sup> [P03856](#), p.2.

<sup>233</sup> [P02653](#); [P01198](#). See [P00059](#)(Clip 1, 01:07:57-01:08:04), p.26; [REDACTED]; [P00842](#), p.4.

they find in the house, no matter if those are children, old and frail people, women and similar”.<sup>234</sup>

## **6. Veljko KADIJEVIĆ and Blagoje ADŽIĆ**

75. As the highest ranking JNA officers, General Veljko KADIJEVIĆ and Colonel General Blagoje ADŽIĆ used the JNA to commit crimes to advance the CCP. KADIJEVIĆ was SFRY Federal Secretary for National Defence and Chief of Staff of the Supreme Command until early January 1992, when he was replaced by ADŽIĆ.<sup>235</sup> Prior to replacing KADIJEVIĆ, ADŽIĆ was Chief of the General Staff of the SFRY Armed Forces.<sup>236</sup> Under MILOŠEVIĆ’s authority,<sup>237</sup> KADIJEVIĆ and ADŽIĆ transformed the previously neutral, multi-ethnic JNA<sup>238</sup> into a Serb army,<sup>239</sup> which KADIJEVIĆ charged with “defending the Serb nation”<sup>240</sup>, “so as to liberate, in all respects, all areas with a majority Serb population [...]”<sup>241</sup> From the summer of 1991, KADIJEVIĆ and ADŽIĆ deployed the JNA in joint operations “in full coordination with Serb insurgents” across Croatia and BiH in furtherance of the CCP.<sup>242</sup> They also ensured that JNA weapons, vehicles, and materiel were preserved to arm and equip Serb Forces for ethnic cleansing operations.<sup>243</sup>

<sup>234</sup> [P00762](#), p.2-3.

<sup>235</sup> [P00003](#), p.2; [1D00131](#); BABIĆMilan:[P01246](#), T.13131,13686; VASILJEVIĆAleksandar:T.30(29-Jan-2019); ANASTASIJEVIĆDejan:[P02423](#), para.45,47; THEUNENSReynaud:[P01980](#), p.123; [REDACTED]. See AF93.

<sup>236</sup> [1D00131](#); BABIĆMilan:[P01246](#), T.13131,13686; THEUNENSReynaud:[P01980](#), p.29,54,123,134; [P03288](#). See AF76.

<sup>237</sup> BABIĆMilan:[P01246](#), T.13131-13132,13686-13688,13700-13702. KADIJEVIĆ and ADŽIĆ met frequently with MILOŠEVIĆ to discuss JNA activities, see e.g. THEUNENSReynaud:[P01980](#), p.124-125; [P02912](#), p.4-6; [P02913](#); [P02914](#); [P02915](#); [P02916](#); [P02917](#); [P02918](#); [P02920](#); [P02921](#); [P02922](#); [P02923](#); [P02924](#); [P02925](#); [P02926](#); [P02928](#); [P02929](#); [P02930](#); [P02932](#).

<sup>238</sup> See e.g. THEUNENSReynaud:[P01980](#), p.32-33.

<sup>239</sup> Cross-reference Section [II.E.1\(c\)](#).

<sup>240</sup> [P03102](#), p.11-12,14,16-18,20; DONIARobert:[P01600](#), p.21-22; [P03288](#); [P03317](#), p.3; THEUNENSReynaud:[P01980](#), p.126-139. See [P03392](#), p.9-10; [P03351](#), p.3; [P02921](#); [P02922](#); [P02923](#); [P02924](#); [P02927](#); [P02928](#); [P02929](#). See also AF75-AF76; AF95; AF106; AF231; AF760; AF762; AF771.

<sup>241</sup> DONIARobert:[P01600](#), p.21-22; [P03102](#), p.14,22-23.

<sup>242</sup> [P03102](#), p.16-23; [P02921](#); [P03317](#); [P03288](#); THEUNENSReynaud:[P01980](#), p.126-139; DONIARobert:[P01600](#), p.21. See e.g. AF75; AF98-AF99; AF105-AF106; AF168; AF170; AF174; AF181; AF183; AF269; AF273; AF341; AF343-345; AF349-351; AF357.

<sup>243</sup> [P03102](#), p.23; [P03162](#); [1D00005](#), p.211-212,296. See AF99; AF174; AF347; AF755-758; AF774; AF802.

## 7. Vojislav ŠEŠELJ

76. SČP and SRS founder and President, Vojislav ŠEŠELJ was a “self-confessed fascist and racist, leader of an infamous group of ethnic-cleansing paramilitaries”.<sup>244</sup> ŠEŠELJ furthered the CCP by inciting inter-ethnic hatred and violence through propaganda<sup>245</sup> and recruiting volunteers.<sup>246</sup> ŠEŠELJ collaborated with the Accused<sup>247</sup> and fellow JCE members, including MILOŠEVIĆ, BOGDANOVIĆ, and KERTES,<sup>248</sup> to arm, train, and deploy these volunteers, known as “Šešelj’s men”/“šeseljevci”, to ethnic cleansing operations with Serb forces in Croatia<sup>249</sup> and BiH.<sup>250</sup> ŠEŠELJ’s men were notorious for their brutality and crimes committed against the non-Serb population as they ruthlessly executed the CCP across Serb-claimed territories.<sup>251</sup> A vocal advocate for an ethnically homogenous “Greater Serbia”,<sup>252</sup> ŠEŠELJ declared “Croats can leave Yugoslavia whenever they please. But they will not take one foot of Serbian land with them.”<sup>253</sup>

## 8. Milan MARTIĆ

77. Milan MARTIĆ was a key implementor of the CCP in Krajina, whose roles included creating separate Serb structures, commanding key perpetrator groups in operations furthering the CCP in 1991, and presiding over continuing crimes targeting non-Serbs throughout the Indictment period. Holding a series of high-level positions in

<sup>244</sup> P00004(00:11:33-00:12:03)(00:12:38-00:12:44), p.5,6; ; P03227, p.4,6; P03733, p.7-8; [REDACTED]; ROBERTSIvor:ID00430, para.168.

<sup>245</sup> P02444, p.54; STOPARIĆGoran:P00796, para.40-41; P00566; P00497(00:00:00-00:01:04); [REDACTED].

<sup>246</sup> RFJ-017:T.16(31-Jan-2019); MAKSIĆRadoslav:P00025, para.101; THEUNENSReynaud:P01980, p.140,143,152; P00004(00:14:11-00:14:15)(00:15:07-00:15:31)(00:35:22-00:35:30)(00:58:35-00:58:50)(00:59:50-01:00:32), p.6-7,15,26; P03187, p.1; [REDACTED]; [REDACTED].

<sup>247</sup> P00794, p.1-2; ANASTASIJEVIĆDejan:P02423, para.95,99,150,156-157; RFJ-017:T.15-16(31-Jan-2019); P00004, p.16-17.

<sup>248</sup> P00004, p.7,13,16-17,23; [REDACTED]; SAVIĆBorivoje:P00449, para.91-92,95,97; [REDACTED].

<sup>249</sup> THEUNENSReynaud:P01980, p.21,148,156,167-168,232,247,255-258,284; STOPARIĆGoran:P00796, para.9,43; BOGUNOVIĆBorislav:P02718, para.53,74; ID00107; P00347, p.1; P03258, p.4-6; P03227, p.6-7; ID00102, p.3-7; NIELSENChristian:P00850, para.E36,369; [REDACTED].

<sup>250</sup> THEUNENSReynaud:P01980, p.24,150,156,185,258,385,414-415,432,446-447,457-459,532-533; P00004, p.23,25-27,29-30,43; ANASTASIJEVIĆDejan:P02423, para.156-157; [REDACTED]; TIHIĆSulejman:P01865, p.7; ID00123, p.2; P02888, p.252; ID00102, p.8-10; [REDACTED]. See AF899.

<sup>251</sup> Cross-reference Section III.B.1(a); Section II.F.2(d)(i); Section III.B.2(b)(iii); Section III.C.2(a). See e.g. THEUNENSReynaud:P01980, p.21,25,248,284,432; NIELSENChristian:P00850, para.E36; [REDACTED]; P01853(00:12:44-00:13:05), p.6; P00347, p.1-2; [REDACTED]; DERONJIĆMiroslav:P01719, T.29627; TIHIĆSulejman:P01865, p.7.

<sup>252</sup> P02444, p.55; P00004(00:08:55-00:09:14)(00:12:39-00:12:48), p.4-6; ANASTASIJEVIĆDejan:P02423, para.143; [REDACTED]; 2D00070, p.19.

<sup>253</sup> P00566.

the SAO-Krajina MUP and defence structures,<sup>254</sup> he had “100 per cent control” over the SAO-Krajina police<sup>255</sup> and controlled volunteer units and the SAO-Krajina TO throughout 1991.<sup>256</sup> On establishment of the RSK, MARTIĆ was appointed RSK Minister of Interior in February 1992, giving him *de jure* command over police forces,<sup>257</sup> and was RSK President from 23 January 1994 until August 1995,<sup>258</sup> giving him *de jure* command over RSK forces.<sup>259</sup> MARTIĆ was pivotal to the “parallel structure” in Krajina through which the Accused and others controlled events.<sup>260</sup> Under the Accused’s instruction,<sup>261</sup> MARTIĆ established police structures in SAO-Krajina, including the SAO-Krajina police (aka “MARTIĆ’s Police”/“*martićevci*”) in 1991<sup>262</sup> and commanded them and SAO-Krajina TO units in operations to cleanse non-Serbs from the region,<sup>263</sup> including operations he planned with **SIMATOVIĆ**,<sup>264</sup> murdering hundreds and forcibly

<sup>254</sup> Secretary of Internal Affairs in the SAO-Krajina (4 January 1991 – 29 May 1991): [P01309](#); [P01310](#); [P01308](#); BABIĆMilan:[P01243](#), p.16,39; [REDACTED]; THEUNENSReynaud:[P01980](#), p.205. See AF151. Minister of Defence (From 29 May 1991): [P01303](#); BABIĆMilan:[P01248](#), T.1406; BABIĆMilan:[P01246](#), T.13156; BABIĆMilan:[P01243](#), p.18; THEUNENSReynaud:[P01980](#), p.208,212-213; NIELSENChristian:[P00850](#), para.268,341. See AF159-AF160. Minister of Interior (From 27 June 1991): [P01305](#); BABIĆMilan:[P01246](#), T.13156; BABIĆMilan:[P01248](#), T.1408,1410; THEUNENSReynaud:[P01980](#), p.208; NIELSENChristian:[P00850](#), para.269. See AF159; AF162. Deputy Commander of the SAO-Krajina TO (8 August 1991 – 30 September 1991): [P00054/P01299](#)(duplicates); MAKSIĆRadoslav:[P00025](#), para.95; BABIĆMilan:[P01243](#), p.18,41; THEUNENSReynaud:[P01980](#), p.209,212-213; NIELSENChristian:[P00850](#), para.268-269. See AF162.

<sup>255</sup> [REDACTED]; THEUNENSReynaud:[P01980](#), p.212-213; [P03430](#), p.1,4; BABIĆMilan:[P01248](#), T.1391,1406-1407,1410; BABIĆMilan:[P01246](#), T.13156-13158,13383,13499-13500; BABIĆMilan:[P01243](#), p.18,41; [REDACTED]; NIELSENChristian:[P00850](#), para.341; MAKSIĆRadoslav:[P00025](#), para.50; [REDACTED]; [P00045](#). Cross-reference Section [II.F.1\(b\)\(i\)c](#).

<sup>256</sup> THEUNENSReynaud:[P01980](#), p.212-217; [REDACTED]; BABIĆMilan:[P01248](#), T.1394-1395,1434,1438; [REDACTED]; [P03297](#); [P00056](#); MAKSIĆRadoslav:[P00025](#), para.97. MARTIĆ continued to exercise control over the SAO-Krajina TO even after the SAO-Krajina Main Staff was established on 30 September 1991: MAKSIĆRadoslav:[P00025](#), para.15,22,33,37,95,97,106; [P00058](#), p.1; [P01536](#), p.5; [P00830](#), p.21.

<sup>257</sup> [P01551](#); [P03434](#); BABIĆMilan:[P01248](#), T.1451-1452; THEUNENSReynaud:[P01980](#), p.304; [P03433](#); [REDACTED]. See AF363. See also [REDACTED]; [ID00011](#), p.2.

<sup>258</sup> NIELSENChristian:[P00850](#), para.E32,317; BABIĆMilan:[P01248](#), T.1452. STANIŠIĆ and MILOŠEVIĆ had supported and financed MARTIĆ’s election campaign, see [REDACTED].

<sup>259</sup> [P03435](#), p.3-4. See e.g. [P01295](#), p.1-2; [P01531](#).

<sup>260</sup> Cross-reference Section [II.E.1\(b\)](#); Section [II.F.1\(a\)\(i\)d](#). See e.g. BABIĆMilan:[P01246](#), T.12918-12920,13492-13493; BABIĆMilan:[P01248](#), T.1391; [REDACTED].

<sup>261</sup> Cross-reference Section [II.E.2\(a\)](#).

<sup>262</sup> Cross-reference Section [II.F.1\(b\)\(i\)a](#); Section [II.E.4\(a\)\(i\)](#). See e.g. [REDACTED]; [P00570](#), p.3-4; [REDACTED].

<sup>263</sup> Cross-reference Section [II.F.1\(c\)\(ii\)c](#)-(iii); Section [III.B.1\(b\)\(iii\)](#); Section [III.B.1\(c\)](#). See e.g. [REDACTED]; BABIĆMilan:[P01243](#), p.18; BABIĆMilan:[P01246](#), T.13402,14096; BABIĆMilan:[P01248](#), T.1438,1601; [REDACTED]; [REDACTED]; [ID00024](#), p.11-12; AF175; AF181; AF198; AF205.

<sup>264</sup> Cross-reference Section [II.F.1\(c\)\(ii\)-\(iii\)](#); Section [III.B.1\(b\)\(iii\)](#). See e.g. [REDACTED]; [P00217](#)(BCS)(signed by **SIMATOVIĆ**).



displacing thousands.<sup>265</sup> MARTIĆ also commanded RSK forces during the Posavina Corridor operations in 1992, where his RSK police persecuted non-Serbs.<sup>266</sup>

78. MARTIĆ was an unambiguous supporter of the CCP,<sup>267</sup> stating that “further co-existence in our Serbian territories of the SAO Krajina is impossible”<sup>268</sup> [REDACTED].<sup>269</sup> He knew of the brutal crimes his forces committed,<sup>270</sup> [REDACTED]<sup>271</sup> [REDACTED].<sup>272</sup> MARTIĆ was violent and “merciless”<sup>273</sup> and admitted “we didn’t care about the victims”,<sup>274</sup> as he made clear in May 1995, when he bombed the children’s hospital in Zagreb in retaliation for a Croat offensive.<sup>275</sup>

## 9. Milan BABIĆ

79. Milan BABIĆ was the primary political leader in Krajina and a central figure establishing the SAO-Krajina and its separate Serb institutions. He was a devoted SDS official<sup>276</sup> who served as the President of the (provisional) Executive Council of SAO-Krajina (from 21 December 1990),<sup>277</sup> President of the SAO-Krajina Government (from 29 May 1991),<sup>278</sup> and briefly as RSK President (from 19 December 1991 until February 1992).<sup>279</sup> From November 1992 to August 1995 BABIĆ was SDS President in Krajina.<sup>280</sup>

<sup>265</sup> Cross-reference Section III.B.1.

<sup>266</sup> Cross-reference Section II.F.4(b)(ii)d. See e.g. [REDACTED]; BABIĆMilan:P01246, T.13244; [REDACTED]; P03443, p.1,4; 1D00024, p.14-15; THEUNENSReynaud:P01980, p.515-516. See AF875. See also P03439, p.1,3,5.

<sup>267</sup> [REDACTED]; P00009(00:10:52-00:17:14), p.2-3; P00010(00:30:15-00:31:15); MAKSIĆRadoslav:P00025, para.119; P00061(00:12:35-00:14:25), p.2; P01558; P03399; P00223; P00224; P00225; P00226; P00227; P00228. See AF77-AF81; AF158; AF181.

<sup>268</sup> P01319. See AF181.

<sup>269</sup> [REDACTED].

<sup>270</sup> [REDACTED]; MAKSIĆRadoslav:P00025, para.130; MAKSIĆRadolsav:T.31(21-Jun-2017); P00063, p.1,3-4; [REDACTED]. See AF180; AF364. See also MAKSIĆRadoslav:P00025, para.50; P03413; P00347, p.1-2; [REDACTED].

<sup>271</sup> [REDACTED].

<sup>272</sup> [REDACTED].

<sup>273</sup> [REDACTED]. See also [REDACTED].

<sup>274</sup> 1D00024, p.12.

<sup>275</sup> [REDACTED]; P02001, p.1; P02002, p.1,3. See AF384.

<sup>276</sup> See e.g. BABIĆMilan:P01248, T.1326; BABIĆMilan:P01246, T.12864,13480,13665-3666; BABIĆMilan:P01243, p.10-13; SAVIĆBorivoje:P00449, para.96; [REDACTED]; AF147.

<sup>277</sup> BABIĆMilan:P01243, p.11; BABIĆMilan:P01246, T.12865,13483,13666; BABIĆMilan:P01248, T.1327; [REDACTED]; P01280; [REDACTED]. See AF154.

<sup>278</sup> BABIĆMilan:P01243, p.11; BABIĆMilan:P01248, T.1328; BABIĆMilan:P01246, T.12865,13483-13484,13665-13666; [REDACTED]. See AF159.

<sup>279</sup> BABIĆMilan:P01243, p.11; BABIĆMilan:P01248, T.1328; BABIĆMilan:P01246, T.12865,13665-13666; [REDACTED]; THEUNENSReynaud:P01980, p.206,304; NIELSENChristian:P00850, para.313,315; [REDACTED]. See AF361.

<sup>280</sup> BABIĆMilan:P01243, p.10-11; BABIĆMilan:P01248, T.1326.

With the support of the Accused and MILOŠEVIĆ,<sup>281</sup> BABIĆ was instrumental in establishing separate Serb government,<sup>282</sup> police,<sup>283</sup> and TO<sup>284</sup> structures, and financing, equipping and distributing weapons to Serb Forces,<sup>285</sup> who executed the persecutory campaign in SAO-Krajina.<sup>286</sup> BABIĆ had *de jure* authority over SAO-Krajina TO forces,<sup>287</sup> which perpetrated many of the charged crimes in SAO-Krajina.<sup>288</sup> On 1 April 1991, he ordered the mobilisation of the TO and volunteer units of the SAO-Krajina.<sup>289</sup> BABIĆ also exploited the media to spread propaganda and fear amongst Krajina Serbs.<sup>290</sup> In spite of his awareness of the crimes committed within his jurisdiction,<sup>291</sup> BABIĆ

<sup>281</sup> Cross-reference Section [II.F.1\(a\)\(ii\)](#); Section [II.F.1\(b\)\(i\)a](#); Section [II.F.1\(b\)\(ii\)-\(iii\)](#). See e.g. BABIĆMilan:[P01246](#), 12912-12916,13177-13179; BABIĆMilan:[P01243](#), p.37,39.

<sup>282</sup> See e.g. [REDACTED]; BABIĆMilan:[P01246](#), T.12865; [REDACTED]; [P01249](#); [P01264](#); [P01435](#); [P01572](#); [P01325](#); [P01336](#). See also [REDACTED]; [P01399](#).

<sup>283</sup> [REDACTED]; RFJ-066:T.11(13-Jul-2017); BABIĆMilan:[P01243](#), p.40; BABIĆMilan:[P01248](#), T.1526-1527,1538-1539,1821-1822. See also e.g. BABIĆMilan:[P01560](#), p.9; THEUNENSReynaud:[P01980](#), p.206; NIELSENChristian:[P00850](#), para.437; [P01309](#); [P01308](#), p.1; [P01311](#); [P01312](#); [P03424](#); [P01315](#); [P01314](#); [P01962](#), p.2.

<sup>284</sup> BABIĆMilan:[P01243](#), p.41-42; BABIĆMilan:[P01246](#), T.13160,13184-13187,13560,13729-13730; [REDACTED]; THEUNENSReynaud:[P01980](#), p.209-210; [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.11-12,16. See also e.g. [P01277](#); [P01343](#); [P01332](#); [P01334](#); [P01335](#); [P01337](#); [P01389](#); [P01347](#); [P00028](#); [P01350](#); [P01355](#); [P01279](#); [P01426](#), p.1-2; AF154.

<sup>285</sup> [REDACTED]; BABIĆMilan:[P01243](#), p.39-40; BABIĆMilan:[P01246](#), T.12912,12962-12965,13191-13192,13269,13274-13277,13291-13292; BABIĆMilan:[P01248](#), T.1461-1462,1526-1527; [P01532](#), p.3-4; [P00384](#); [REDACTED]; [P00382](#), p.2; [REDACTED]; [ID00024](#), p.5-7; [P01369](#).

<sup>286</sup> Cross-reference Section [II.F.1\(c\)\(ii\)-\(iii\)](#); Section [III.B.1](#).

<sup>287</sup> BABIĆMilan:[P01246](#), T.12965,12992-12993,13133-13134,13187-13189,13375-13376,13459,13739-13740; BABIĆMilan:[P01248](#), T.1422-1423; BABIĆMilan:[P01243](#), p.11,18-19; THEUNENSReynaud:[P01980](#), p.208-211; NIELSENChristian:[P00850](#), para.345; [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.31,40,95; [REDACTED]; [P01337](#), p.2; [P01389](#); [P03430](#), p.2-3. See AF162. BABIĆ signed numerous decisions and orders confirming his *de jure* authority over the SAO-Krajina TO: see e.g. [P00054/P01299](#)(duplicates); [P00027](#); [P01372](#); [P00028](#); [P00033](#); [P01352](#); [P01357](#); [P01343](#); [P01332](#); [P01298](#); [P01334](#); [P01335](#); [P01338](#); [P01300](#); [P01340](#); [P01341](#); [P01301](#); [P01342](#); [P01292/P01379](#)(duplicates); [P01344](#); [P01345](#); [P01347](#); [P01370](#); [P01349](#); [P01350](#); [P01371](#); [P01348/P01351](#)(duplicates); [P01353](#); [P00037/P01302](#)(duplicates); [P01355](#); [P01279](#); [P01356](#); [P01358](#); [P00035](#); [P00036](#); [P01390](#); [P01359](#); [P01392](#); [P01391](#); [P00032](#); [P01398](#); THEUNENSReynaud:[P01980](#), p.208-211,215; NIELSENChristian:[P00850](#), para.349; MAKSIĆRadoslav:[P00025](#), para.26-28,36. BABIĆ received daily situation reports from the SAO-Krajina TO: MAKSIĆRadoslav:[P00025](#), para.93; THEUNENSReynaud:T.23-26(7-Mar-2018); [P01965](#); [P03074](#); [P03076](#); [P01966](#); [P01967](#); [P03077](#); [P01968](#); [P03078](#); [P03079](#); [P03080](#); [P00241](#); [P03081](#); [P02984](#); [P00048](#); [P00056](#).

<sup>288</sup> Cross-reference Section [III.B.1\(b\)\(i\),\(iii\)](#); Section [III.B.1\(c\)\(i\)-\(iv\)a](#). [REDACTED].

<sup>289</sup> [P01277](#); BABIĆMilan:[P01248](#), T.1538; THEUNENSReynaud:[P01980](#), p.206; NIELSENChristian:[P00850](#), para.337. See AF154. BABIĆ again ordered the mobilisation on 11 July 1991, see [P01297](#); BABIĆMilan:[P01243](#), p.41; [REDACTED].

<sup>290</sup> [REDACTED]; [P03740](#), p.1; BABIĆMilan:[P01248](#), T.1471; [P01294](#); [P00351](#)(00:01:04-00:01:21), p.1; [REDACTED]. See also [P01565](#), p.1-7; BABIĆMilan:[P01248](#), T.1845-1846.

<sup>291</sup> BABIĆMilan:[P01243](#), p.18-22; [REDACTED]; BABIĆMilan:[P01248](#), T.1432-1433,1600-1601,1604,1619; BABIĆMilan:[P01246](#), T.13067-13069,13267-13269,13308,13392,13400,14096; [REDACTED]. See also [P01388](#).

continued to hold his positions of authority without taking any measures to protect non-Serbs.<sup>292</sup>

80. BABIĆ was an extreme Serb nationalist,<sup>293</sup> publicly advocating for a unified, ethnically homogenous Serb state,<sup>294</sup> [REDACTED].<sup>295</sup> He considered himself a “Serb ethno-egoist”—“a person who exclusively wanted to see to the interests of people to which [he] belonged” while he “neglected the interests and suffering of the other peoples, at the time the Croatian people”.<sup>296</sup>

## 10. Goran HADŽIĆ

81. Goran HADŽIĆ was “MILOŠEVIĆ’s man” in the SBWS,<sup>297</sup> the primary political leader responsible for establishing and leading separate Serb structures in SAO-SBWS,<sup>298</sup> and directly involved with ARKAN<sup>299</sup> in the charged crimes against non-Serbs in SBWS.<sup>300</sup> He was President of the SBWS SNC (from March 1991),<sup>301</sup> and, with MILOŠEVIĆ’s support, President-designate of SAO-SBWS (from 25 June 1991),<sup>302</sup> President of SAO-SBWS Government (from 25 September 1991),<sup>303</sup> and RSK President

<sup>292</sup> MAKSIĆRadoslav:[P00025](#), para.121,129; MAKSIĆRadoslav:T.13(21-Jun-2017); BABIĆMilan:[P01246](#), T.13418-13419.

<sup>293</sup> BABIĆMilan:[P01246](#), T.13419,13469-13471,13517,13629-13631,13668-13669; [REDACTED]; SAVIĆBorivoje:T.29(12-Sep-2017); SAVIĆBorivoje:[P00449](#), para.96; [REDACTED]. See also [REDACTED].

<sup>294</sup> [P00351](#)(00:08:45-00:11:06), p.1; BABIĆMilan:[P01246](#), T.13005,13048-13049,13915; BABIĆMilan:[P01248](#), T.1437; [REDACTED]; [P00134](#)(00:42:52-00:43:42), p.16; [P01423](#), p.2. See AF158. See also [P01274](#); [REDACTED].

<sup>295</sup> [REDACTED].

<sup>296</sup> BABIĆMilan:[P01243](#), p.20; BABIĆMilan:[P01246](#), T.13419,13556-13557,13631,13668-13669,14044-14045; [REDACTED]. See also SAVIĆBorivoje:[P00449](#), para.96; [REDACTED]; BABIĆMilan:[P01248](#), T.1471-1472.

<sup>297</sup> [REDACTED]. See also BOGUNOVIĆBorislav:[P02718](#), para.82; BABIĆMilan:[P01246](#), T.13230; SAVIĆBorivoje:[P00449](#), para.74; BOGUNOVIĆBorislav:[P02720](#), T.5972-5975,6042-6043; [REDACTED].

<sup>298</sup> Cross-reference Section [II.F.2\(a\)](#); Section [II.F.2\(d\)\(i\)](#). See e.g. BOGUNOVIĆBorislav:[P02718](#), para.6; THEUNENSReynaud:[P01980](#), p.252; [REDACTED]; NIELSENChristian:[P00850](#), para.281-282,289; [REDACTED].

<sup>299</sup> See also ANASTASIJEVIĆDejan:[P02423](#), para.84; [REDACTED]; [P00357](#)(00:36:30-01:02:52), p.11; [P03394](#), p.9; SAVIĆBorivoje:[P00449](#), para.80; BOGUNOVIĆBorislav:[P02718](#), para.34,45,79; BOGUNOVIĆBorislav:[P02719](#), para.18; BOGUNOVIĆBorislav:[P02720](#), T.5988; [ID00122](#), p.11; ANASTASIJEVIĆDejan:T.19-20(19-Jun-2018); THEUNENSReynaud:[P01980](#), p.259; [P03719](#); [REDACTED].

<sup>300</sup> Cross-reference Section [III.B.2\(c\)\(i\)a](#).

<sup>301</sup> BOGUNOVIĆBorislav:[P02718](#), para.7; NIELSENChristian:[P00850](#), para.274; THEUNENSReynaud:[P01980](#), p.252.

<sup>302</sup> BOGUNOVIĆBorislav:[P02718](#), para.6,82; THEUNENSReynaud:[P01980](#), p.252; NIELSENChristian:[P00850](#), para.279-280; [P00465](#), p.2; [REDACTED].

<sup>303</sup> THEUNENSReynaud:[P01980](#), p.252; NIELSENChristian:[P00850](#), para.289,317; [P00454](#); [P00465](#), p.1-2; [P03427](#).



(from 25 February 1992 until 23 January 1994).<sup>304</sup> Acting under the control of MILOŠEVIĆ and STANIŠIĆ,<sup>305</sup> HADŽIĆ advanced the CCP by establishing separate Serb structures in the SAO-SBWS, including the SUP<sup>306</sup> and its police units,<sup>307</sup> TO,<sup>308</sup> and his own security service, the SNB.<sup>309</sup>

82. As President of SAO-SBWS and then the RSK, HADŽIĆ had authority over the armed forces in the region,<sup>310</sup> and was aware of the crimes committed by Serb Forces within his jurisdiction.<sup>311</sup> HADŽIĆ publicly advocated for the JCE's shared vision of a unified, ethnically homogenous Serb state<sup>312</sup> and promoted ethnic and political division between Serbs and non-Serbs,<sup>313</sup> declaring "[n]o common state of Serbs and Croats can survive" and "we want to put the issue of Serbdom first".<sup>314</sup> He actively contributed to

<sup>304</sup> [P03437](#), p.4; [REDACTED]; WILSONJohn:T.15(27-Jun-2017); WILSONJohn:T.35-36(28-Jun-2017); BABIĆMilan:[P01246](#), T.13219-13223,13226-13227,13618-13622; BABIĆMilan:[P01560](#), p.10; NIELSENChristian:[P00850](#), para.315,317; THEUNENSReynaud:[P01980](#), p.304; [REDACTED].

<sup>305</sup> *Cross-reference* Section [II.E.2\(b\)](#); Section [II.F.2\(a\)](#). *See e.g.* BABIĆMilan:[P01246](#), T.13230; BOGUNOVIĆBorislav:[P02719](#), para.11-15,18; BOGUNOVIĆBorislav:[P02720](#), T.5972-5974,5995-5996,6042-6047; BOGUNOVIĆBorislav:[P02718](#), para.6,26; SAVIĆBorivoje:[P00449](#), para.74; [P00485](#), p.6; RFJ-017:T.50-51(30-Jan-2019); RFJ-017:T.7-8(6-Feb-2019); NIELSENChristian:[P00850](#), para.458; [1D00036](#), p.19; [REDACTED].

<sup>306</sup> *Cross-reference* Section [II.F.2\(d\)\(i\)](#). *See e.g.* [2D00037](#); NIELSENChristian:[P00850](#), para.282; [1D00295](#), p.1; BOGUNOVIĆNebojša:T.44-45(4-Sep-2019); [REDACTED]; [P03750](#), p.2; [REDACTED].

<sup>307</sup> *Cross-reference* Section [II.F.2\(d\)\(i\)](#). *See e.g.* BOGUNOVIĆNebojša:T.50(4-Sep-2019); BOGUNOVIĆNebojša:T.28(3-Sep-2019); [REDACTED]; [P01259](#); THEUNENSReynaud:[P01980](#), p.339; BOGUNOVIĆBorislav:[P02719](#), para.14; BOGUNOVIĆBorislav:[P02718](#), para.13; BOGUNOVIĆBorislav:[P02720](#), T.5995-5996,6010-6011; [REDACTED]; [2D00038](#).

<sup>308</sup> *Cross-reference* Section [II.F.2\(d\)\(i\)](#). *See e.g.* [P00572](#); NIELSENChristian:[P00850](#), para.281-282; ANASTASIJEVIĆDejan:[P02423](#), para.84; [1D00295](#), p.1; [REDACTED]; SAVIĆBorivoje:T.65(13-Sep-2017); RFJ-017:T.50-51(30-Jan-2019); RFJ-017:T.7-8(6-Feb-2019); BOGUNOVIĆNebojša:T.38(3-Sep-2019); [REDACTED]. *See also* [P00465](#), p.2; [P00022](#), p.1; BOGUNOVIĆNebojša:T.39(4-Sep-2019); BOGUNOVIĆBorislav:[P02718](#), para.56,73; BOGUNOVIĆBorislav:[P02720](#), T.6018-6021,6025; [P00499](#)(00:00:00-00:00:0033), p.1; THEUNENSReynaud:T.51-52(7-Mar-2018); [P01976](#), p.3; BABIĆMilan:[P01246](#), T.13230; ANASTASIJEVIĆDejan:T.67(14-Jun-2018); RFJ-017:T.22(6-Feb-2019); RFJ-017:T.43-44(31-Jan-2019); SAVIĆBorivoje:[P00449](#), para.175.

<sup>309</sup> *Cross-reference* Section [II.F.2\(g\)](#). *See e.g.* BOGUNOVIĆBorislav:[P02720](#), T.6039; [REDACTED].

<sup>310</sup> *Cross-reference* Section [II.F.2\(d\)\(i\)](#); Section [II.F.2\(g\)](#); Section [II.F.2\(h\)\(i\)](#). *See e.g.* [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.84; [REDACTED]. *See also* NIELSENChristian:[P00850](#), para.458; [REDACTED]; [P00571](#); THEUNENSReynaud:[P01980](#), p.339.

<sup>311</sup> [P00101](#), p.6-7; [P00128](#), p.8,21; WILSONJohn:T.60(27-Jun-2017); [P00151](#); SAVIĆBorivoje:[P00449](#), para.193; [REDACTED].

<sup>312</sup> *Cross-reference* Section [II.F.2\(a\)i](#). *See e.g.* WILSONJohn:T.17-18(27-Jun-2017); [P00113](#), p.3; [P00134](#)(00:20:35-00:21:06)(00:41:22-00:41:51), p.6,15; [REDACTED]; [P00061](#)(00:05:58-00:06:12), p.2; [P00456](#)(Clip 2, 00:00:18-00:00:56); [P00467](#), p.3; [P00483](#)(00:00:00-00:01:30), p.18; [P00360](#); [P00361](#)(00:00:00-00:01:13)(00:02:02-00:02:09)(00:03:34-00:03:37)(00:04:44-00:05:40)(00:05:50-00:06:30)(00:07:56-00:08:13)(00:12:43-00:12:57), p.1-4,7; [P00365](#)(00:03:34-00:00:05:10), p.3; [REDACTED].

<sup>313</sup> *Cross-reference* Section [II.F.2\(a\)i](#). *See e.g.* [P03425](#); [P00483](#)(00:00:00-00:01:30), p.24; [P00022](#), p.1; SAVIĆBorivoje:T.55-56(12-Sep-2017); [REDACTED]. *See also* [REDACTED].

<sup>314</sup> [P00361](#)(00:02:02-00:02:09)(00:03:34-00:03:37)(00:05:50-00:06:30)(00:07:56-00:08:1300), p.2,4.

crimes furthering the CCP,<sup>315</sup> including the charged murders committed by the SNB under his command.<sup>316</sup> He was personally involved in events surrounding the charged murder of 11 detainees in Dalj in 1991.<sup>317</sup>

## **11. Ratko MLADIĆ**

83. Bosnian Serb military commander Ratko MLADIĆ used his troops to persecute, forcibly expel, and murder non-Serbs to advance the CCP. He was Chief of Staff and Assistant Commander of the JNA 9<sup>th</sup> Corps, based in Knin, from July 1991 until his promotion to Commander in December 1991.<sup>318</sup> Acting in concert with MARTIĆ, MLADIĆ gained notoriety for his effective ethnic cleansing operations in the SAO-Krajina, demonstrating his willingness to commit crimes to remove non-Serb civilians from Serb-claimed territories.<sup>319</sup> After MLADIĆ ruthlessly commanded SAO-Krajina expulsion operations, he was promoted within the JNA in April 1992 even as MILOŠEVIĆ purged the JNA of its non-Serb and pro-Yugoslav leadership.<sup>320</sup> On 12 May 1992, with MILOŠEVIĆ's agreement, the RS Assembly appointed MLADIĆ to the position of VRS Main Staff Commander—the day it established the VRS and approved the Six Strategic Goals.<sup>321</sup> Thereafter, MLADIĆ cooperated with STANIŠIĆ, SIMATOVIĆ, and other JCE members to implement those Goals.<sup>322</sup> MLADIĆ repeatedly demonstrated his “unbridled and unconcealed”<sup>323</sup> hatred of non-Serbs as he commanded VRS forces in a bloody campaign across BiH—murdering, persecuting, and

<sup>315</sup> See e.g. [REDACTED]; SAVIĆBorivoje:[P00449](#), para.193; ANASTASIJEVIĆDejan:[P02423](#), para.84; RFJ-017:T.29-31,34(5-Feb-2019); [P03394](#), p.9,11,14; [P00022](#), p.1.

<sup>316</sup> Cross-reference Section [II.F.2\(g\)-\(h\)i](#); Section [III.B.2\(c\)\(ii\)a,c-d](#). See e.g. [REDACTED]; [REDACTED].

<sup>317</sup> Indictment, para.36. Cross-reference Section [III.B.2\(c\)\(i\)a](#). See e.g. [P00593](#); [P00551](#); [P00578](#); ŠUTALOŁuka:[P01834](#), p.12-13; NIELSENChristian:[P00850](#), para.372; THEUNENSReynaud:[P01980](#), p.285-286; [REDACTED].

<sup>318</sup> [P03757](#); THEUNENSReynaud:[P01980](#), p.139; BABIĆMilan:[P01244](#), para.15; [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.29,82,120; [REDACTED].

<sup>319</sup> [P01249](#), p.42; [1D00024](#), p.11-12; THEUNENSReynaud:[P01980](#), p.220-222; [P02886](#), p.348,356,361-362; [REDACTED]; BABIĆMilan:[P01244](#), para.15; [REDACTED]; [P00052](#), p.20; [P00049](#); [REDACTED]. See AF181-AF183; AF186; AF269; AF391. Cross-reference Section [III.B.1\(c\)](#).

<sup>320</sup> [P03395](#); [P03396](#); [P02442](#), p.1-9. Cross-reference Section [II.E.1\(c\)](#).

<sup>321</sup> Cross-reference Section [II.F.4\(a\)\(ii\)d](#). See e.g. [P03395](#); [P03566](#); [P01249](#), p.53; DONIARRobert:T.37(30-Jan-2018); DONIARRobert:[P01598](#), p.10. See AF785; AF798; AF813; AF818; AF1222.

<sup>322</sup> Cross-reference Section [II.F.4](#); Section [II.F.5](#). See e.g. [REDACTED]; DONIARRobert:[P01597](#), p.103; [P01943](#), p.137-139; THEUNENSReynaud:[P01980](#), p.417,420-421; [P02890](#), p.233-234,238-243; [1D00036](#), p.19,53-61; [1D00037](#), p.81-101; [1D00057](#), p.72-73,140,206-209. See AF785; AF820; AF861; AF863.

<sup>323</sup> ROBERTSIvor:T.30(15-Oct-2019); ROBERTSIvor:[1D00432](#), p.48.

forcibly displacing thousands.<sup>324</sup> Talking to a subordinate in October 1991, **MLADIĆ** declared: “[a]ll that is older than 10 and younger than 75 will come to harm in Šibenik and we will not leave a single house standing”.<sup>325</sup> In November 1992, **MLADIĆ** issued Directive 4, ordering the Drina Corps to “exhaust the enemy, inflict the heaviest possible losses on him and force him to leave the Birač, Žepa, and Goražde areas *together with the Muslim population*”.<sup>326</sup>

## **12. Radovan KARADŽIĆ, Momčilo KRAJIŠNIK, and Biljana PLAVŠIĆ**

84. As leading Bosnian Serb political leaders and policymakers,<sup>327</sup> Radovan KARADŽIĆ, Momčilo KRAJIŠNIK, and Biljana PLAVŠIĆ spearheaded the process of creating separate Serb structures in BiH, which they then used to further the CCP.

85. KARADŽIĆ was founder and President of the SDS in BiH from July 1990.<sup>328</sup> He acted as the Bosnian Serbs’ National Security Council President from its formation on 27 March 1992.<sup>329</sup> On 12 May 1992, following the RS’s declaration of independence,<sup>330</sup> KARADŽIĆ became President of its three-member Presidency,<sup>331</sup> and became sole President on 17 December 1992.<sup>332</sup> Biljana PLAVŠIĆ, also an SDS representative, was a member of the BiH Presidency, then served with KARADŽIĆ as one of the three-member RS Presidency.<sup>333</sup> From 17 December 1992, PLAVŠIĆ acted as one of two RS Vice-Presidents under President KARADŽIĆ.<sup>334</sup> KRAJIŠNIK was an SDS member,<sup>335</sup> President and Speaker of the RS Assembly from its inception in October 1991,<sup>336</sup> and joined the RS Presidency when it expanded to five members in June 1992.<sup>337</sup>

<sup>324</sup> Cross-reference Section [II.F.4](#); Section [II.F.5](#). See e.g. [REDACTED]; [P03585](#); [P00093](#), p.2; [P01935](#), p.5-6; [P03629](#); [1D00057](#), p.72-73,190. See AF785; AF861; AF866; AF1186; AF1193-AF1194; AF1220; AF1124-AF1126; AF1232-1233.

<sup>325</sup> [P00052](#), p.20.

<sup>326</sup> [P01935](#), p.5(emphasis added). Cross-reference Section [II.F.4\(b\)\(iv\)](#).

<sup>327</sup> BABIĆMilan:[P01244](#), para.7-8; [REDACTED]; DONIARobert:T.14(1-Feb-2018). See AF621. Cross-reference Section [II.F.4\(a\)](#).

<sup>328</sup> BABIĆMilan:[P01246](#), T.12896; [REDACTED]; BABIĆMilan:[P01560](#), para.5; [REDACTED]. See AF417; AF422.

<sup>329</sup> See AF597. [P03560](#).

<sup>330</sup> See AF531; AF609.

<sup>331</sup> The Presidency effectively operated as an expanded five-member Presidency from its inception. [P01575](#), p.2; [P01249](#), p.54. See AF609-AF610; AF612; AF616-AF620.

<sup>332</sup> See AF618-AF619.

<sup>333</sup> [REDACTED]. See AF431; AF531; AF609.

<sup>334</sup> See AF619.

<sup>335</sup> [REDACTED]; BABIĆMilan:[P01244](#), para.7; [P02014](#); [REDACTED]. See AF482; AF621.

<sup>336</sup> [P01749](#), p.2; [REDACTED]; [1D00040](#), p.11. See AF430; AF490; AF472; AF482-AF483.

<sup>337</sup> See AF612; AF616-AF620.

86. KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ implemented a campaign of “regionalisation”, creating separate Serb structures in Serb-claimed territories and effecting discriminatory policies to expel non-Serbs.<sup>338</sup> They played key roles in forming and directing the Crisis Staffs,<sup>339</sup> TO,<sup>340</sup> VRS,<sup>341</sup> and police.<sup>342</sup> The Presidency, in its various iterations, always exercised supreme command over the VRS and RS-MUP.<sup>343</sup> PLAVŠIĆ actively solicited paramilitaries from Serbia, sending an open and public invitation to ARKAN, ŠEŠELJ, and others.<sup>344</sup> KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ regularly consulted with Belgrade authorities, including MILOŠEVIĆ and STANIŠIĆ, regarding the CCP’s implementation, and sought their assistance with arming, mobilising forces, and forcibly removing non-Serbs from BiH.<sup>345</sup> They also coordinated with Serbian military, police, and paramilitary units within and outside BiH to achieve their objective of establishing Serbian ethnic territories in BiH.<sup>346</sup>

<sup>338</sup> DONIARobert:[P01600](#), p.32; DONIARobert:T.15-16,26-29(30-Jan-2018); DONIARobert:T.54-56(31-Jan-2018); DONIARobert:T.39(2-Feb-2018); THEUNENSReynaud:[P01980](#), p.372; DERONJIĆMiroslav:[P01726](#), p.20; [P03551](#); [P01589](#); DONIARobert:[P01597](#), p.80,102 ; [P03553](#); [P01438](#), p.7; [1D00075](#), p.1,6-8; [P01733](#), p.83-84; [1D00076](#), p.12; DERONJIĆMiroslav:[P01719](#), T.29624; [P03546](#), p.9; BABIĆMilan:[P01244](#), para.7; [REDACTED]. See AF724-AF726; AF710; AF718-AF719; AF459; AF482; AF497-AF513; AF518; AF620-AF621. Cross-reference Section [II.F.4\(a\)\(i\)](#).

<sup>339</sup> DERONJIĆMiroslav:[P01718](#), T.911-913; THEUNENSReynaud:[P01980](#), p.378; NIELSENChristian:[P00850](#), p.158; [P01589](#), p.10,13,15,27. See AF502; AF541; AF547; AF551-AF552; AF555-AF557.

<sup>340</sup> DONIARobert:[P01597](#), p.76,102; [P01428](#), p.3; [P00068](#), p.69; THEUNENSReynaud:[P01980](#), p.371-372,380. See AF577; AF728; AF786; AF788; AF810; AF581.

<sup>341</sup> [P01249](#), p.54; [P03566](#); [P03610](#); DONIARobert:T.37(30-Jan-2018); DONIARobert:[P01598](#), p.10; THEUNENSReynaud:[P01980](#), p.387; [P03572](#); [P02949](#); [P01937](#), p.7. See AF782-AF783; AF785; AF793; AF817-AF819; AF859; AF479; AF1189; AF1222.

<sup>342</sup> NIELSENChristian:[P00850](#), p.169-170; [REDACTED]. See AF498; AF504; AF588; AF625; AF648; AF681; AF683; AF819; AF841.

<sup>343</sup> The expanded five-member RS Presidency had supreme command over the VRS and RS-MUP until KARADŽIĆ’s appointment as President. [P03610](#); [P01249](#), p.54; [P03572](#). See AF619; AF783; AF793-AF794; AF817; AF859; AF669; AF709.

<sup>344</sup> [2D00072](#), p.20; OFS-23:T.23-25(15-Sep-2020); [REDACTED]; [P02956](#); NIELSENChristian:T.29-30(23-Nov-2017); [REDACTED]; DIMITRIJEVIĆJovan:T.41(11-Feb-2020); [REDACTED]; [2D00436](#).

<sup>345</sup> [REDACTED]; [1D00002](#), p.5; NIELSENChristian:[P00850](#), p.15,252-253; DERONJIĆMiroslav:[P01726](#), p.20; DERONJIĆMiroslav:[P01717](#), para.8,172-175; DERONJIĆMiroslav:[P01719](#), T.29632,29635,29743-29744,29668-29670; DERONJIĆMiroslav:[P01718](#), T.947-948,956-957; [P03706](#), p.2; [REDACTED]; [1D00042](#), p.2-3; [P01449](#); [1D00036](#), p.20-27,53-58,60-61; [P02943](#); [P02942](#); MILOVANOVIĆManojlo:[P02934](#), T.4423-4424,4426-4427; [REDACTED]; BABIĆMilan:[P01246](#), T.13055-13056,13083-13086; [REDACTED]; [P01471](#); [P01491](#); [P02777](#); [P02779](#); [P02780](#); [P01505](#); [P02782](#); [REDACTED]; [P01590](#); [REDACTED]; [1D00059](#); [P02787](#); [P01612](#); [P02789](#); [P02790](#); [P02791](#); [P02792](#); [P02890](#), p.234,240-242.

<sup>346</sup> DERONJIĆMiroslav:[P01726](#), p.20; [2D00072](#), p.20; [2D00152](#), p.11; MILOVANOVIĆManojlo:[P02934](#), T.4397-4398; [REDACTED].

87. KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ were vocal about their shared CCP. An “unrepentant nationalist”,<sup>347</sup> KARADŽIĆ fomented Serb fear and hatred of Muslims and Croats,<sup>348</sup> and advocated for the annihilation and extinction of Muslims to achieve their forcible and permanent removal from Serb-claimed territories in BiH.<sup>349</sup> KRAJIŠNIK considered ethnic separation to be the most important of the Six Strategic Goals,<sup>350</sup> and supported the use of force to ensure the permanent removal of the non-Serb population from Serb-claimed territories in BiH.<sup>351</sup> PLAVŠIĆ publicly embraced and praised ARKAN and his SDG in Bijeljina the day after they violently murdered and expelled many of the municipality’s non-Serbs,<sup>352</sup> and announced during a RS Assembly session in July 1992 that the Serbs should be prepared to “move large masses of people”, and “create conditions for...forced emigration”.<sup>353</sup>

### 13. *Miće STANIŠIĆ*

88. Miće STANIŠIĆ’s role was to organise and deploy RS-MUP forces used for crimes furthering the CCP. As member of the SDS and Serbian National Security Council, M.STANIŠIĆ was appointed RS-MUP Minister on 24 March 1992 and served as adviser to the RS President.<sup>354</sup> As RS-MUP Minister, M.STANIŠIĆ played a key role in creating an ethnically separate RS-MUP.<sup>355</sup> M.STANIŠIĆ regularly consulted STANIŠIĆ and the Belgrade authorities regarding the RS-MUP’s organisation, weapons, supplies, uniforms and training, and sought their instructions and approval prior to taking

<sup>347</sup> ROBERTSIvor:[ID00429](#), para.12; DERONJIĆMiroslav:[P01718](#), T.893-894,1138-1141; DERONJIĆMiroslav:[P01719](#), T.29623; DERONJIĆMiroslav:[P01726](#), p.20; DONIARobert:T.5(1-Feb-2018); [REDACTED]; BABIĆMilan:[P01246](#), T.13054-13055. See AF448; AF488-AF489; AF493; AF713.

<sup>348</sup> [P01588](#)(0:00:00-00:02:23), p.1; DONIARobert:T.20-23(30-Jan-2018); DONIARobert:[P01600](#), p.46; [P00155](#), p.14; DONIARobert:[P01597](#), p.136-137; [REDACTED]. See AF466; AF469.

<sup>349</sup> [P01477](#), p.7-8,14-15; [P01478](#), p.3; [P01479](#), p.2; [REDACTED]; [P01934](#), p.5; DERONJIĆMiroslav:[P01726](#), p.20.

<sup>350</sup> DONIARobert:[P01597](#), p.26; [P03049](#)(00:00:00-00:02:06); DONIARobert:[P01598](#), p.7,10; NIELSENChristian:[P00850](#), p.168-169; DERONJIĆMiroslav:[P01726](#), p.20; DONIARobert:[P01599](#), p.25; DONIARobert:T.37,64(30-Jan-2018); [REDACTED]; [P01249](#), p.9-11; [P01591](#). See AF490; AF854-AF855; AF859.

<sup>351</sup> DONIARobert:T.13-15(1-Feb-2018); DERONJIĆMiroslav:[P01726](#), p.20.

<sup>352</sup> [2D00073](#), p.2; [ID01184](#), p.12-13; [2D00028](#)(00:00:00-00:00:29). Cross-reference Section [III.C.1](#)(a)-(b).

<sup>353</sup> [ID01310](#), p.25-26.

<sup>354</sup> M.STANIŠIĆ was replaced as RS Minister of Internal Affairs by Ratko ADŽIĆ on 20 January 1993, but was reappointed to the role on 30 December 1993. [REDACTED]; [P03560](#); DONIARobert:[P01598](#), p.8; [P03474](#), p.1; GREKULOVICŠrdan:T.14-15(9-Oct-2019); DONIARobert:[P01597](#), p.46; NIELSENChristian:[P00850](#), p.170,250; [P02390](#). See AF516; AF646; AF655.

<sup>355</sup> [P03472](#); [P03474](#); DONIARobert:[P01598](#), p.8; [P03492](#), p.3,5; [2D00190](#). See AF655; AF521.



any action.<sup>356</sup> He also ensured close cooperation between the RS-MUP and VRS,<sup>357</sup> deploying his police into operations alongside the VRS and other Serb Forces to disarm, arrest, round up, detain, beat, kill, and expel Muslims and Croats in BiH.<sup>358</sup>

#### **D. STANIŠIĆ and SIMATOVIĆ contributed to the CCP using key SerbianDB assets and units who they controlled**

89. STANIŠIĆ and SIMATOVIĆ contributed to the CCP using SerbianDB associates, operatives, and the SerbianDB units, over whom the Accused exercised authority. The actions of the Accused's significant SerbianDB associates—Dragan VASILJKOVIĆ aka Captain DRAGAN<sub>(DB)</sub>, Rade KOSTIĆ<sub>(DB)</sub>, Ilija KOJIĆ<sub>(DB)</sub>, and Branko POPOVIĆ<sub>(DB)</sub> aka Marko PAVLOVIĆ<sub>(DB)</sub>—and their SerbianDB units—the Unit, SDG and Scorpions—are attributable to the Accused. Through these individuals and units, the Accused armed, trained, financed and otherwise supported, directed, and deployed Serb Forces and committed horrific crimes furthering the CCP, as developed in Sections II.E, II.F, and III below.

#### **1. Captain DRAGAN<sub>(DB)</sub>, Radoslav KOSTIĆ<sub>(DB)</sub>, Ilija KOJIĆ<sub>(DB)</sub>, and Marko PAVLOVIĆ<sub>(DB)</sub> were key among the SerbianDB assets STANIŠIĆ and SIMATOVIĆ controlled and used to advance the CCP**

90. STANIŠIĆ and SIMATOVIĆ utilised key SerbianDB operatives and associates to advance the CCP. They installed trusted individuals within the government, police, and security structures of the Serb territories and used those individuals to arm, train, finance, and otherwise prepare Serb Forces who would commit crimes furthering the CCP, while simultaneously ensuring that MUP structures enabled and fostered impunity for the crimes rather than preventing them.

91. The Accused used numerous such individuals to make their contributions, as detailed elsewhere,<sup>359</sup> but four of their associates were particularly critical to the

<sup>356</sup> [REDACTED]; [P01794](#); NIELSENChristian:[P00850](#), p.15,252,255-256; [1D00036](#), p.53-61; MILOVANOVIĆManojlo:[P02935](#), T.15445-15446; DONIARRobert:[P01597](#), p.46; [P01626](#); [P03486](#), p.11; [P01789](#).

<sup>357</sup> M.STANIŠIĆ ordered all RS-MUP employees organise into “war units”: [P03491](#), p.15,21-22; [P03492](#), p.4; [P01626](#); NIELSENChristian:[P00850](#), p.14. See AF672-AF673; AF680; AF683; AF692.

<sup>358</sup> NIELSENChristian:[P00850](#), p.233,236,247-248; [REDACTED]; [P03486](#), p.4,7,11; [P03491](#), p.9,15,21; [P03483](#); [P03110](#); [P01793](#); [P02888](#), p.373-374; [REDACTED]. See AF674-AF676; AF679; AF686-AF687; AF706-AF707; AF709. Cross-reference Section [III.C.1-5](#).

<sup>359</sup> Cross-reference Section [II.F.1\(b\)\(i\)b](#); Section [II.F.2\(b\)](#); Section [II.F.3\(b\)](#); Section [II.F.4\(a\)\(ii\)b](#).

Accused's activities furthering the CCP over a long period of time: Dragan VASILJKOVIĆ aka Captain DRAGAN<sub>(DB)</sub>, Rade KOSTIĆ<sub>(DB)</sub>, Ilija KOJIĆ<sub>(DB)</sub>, and Marko PAVLOVIĆ<sub>(DB)</sub>. The Accused's authority over these individuals, as set out here, establishes that these individuals' actions' furthering the CCP were carried out under the Accused's authority and at the Accused's behest, and are attributable to the Accused.

(a) Both Accused had authority over Captain DRAGAN<sub>(DB)</sub>, which they used to further the CCP in Krajina, SBWS, and BiH

92. Captain DRAGAN<sub>(DB)</sub> was working for and under the authority of the Accused from the beginning of the Indictment period,<sup>360</sup> as he worked to establish, arm, and train numerous Serb Forces—including the Accused's Unit—which were instrumental in crimes furthering the CCP. At STANIŠIĆ's behest,<sup>361</sup> SIMATOVIĆ brought Captain DRAGAN<sub>(DB)</sub> to Krajina in the spring of 1991 to lead the training at the Accused's Golubić camp, as detailed below.<sup>362</sup> In Krajina, Captain DRAGAN<sub>(DB)</sub> was under the control of the Accused<sup>363</sup> and worked directly under SIMATOVIĆ.<sup>364</sup> SIMATOVIĆ issued orders to Captain DRAGAN<sub>(DB)</sub>,<sup>365</sup> [REDACTED],<sup>366</sup> and was in charge of his men.<sup>367</sup> Captain DRAGAN<sub>(DB)</sub>, as "Frenki's subordinate",<sup>368</sup> reported to SIMATOVIĆ<sup>369</sup> and the SerbianDB, under his pseudonym Daniel SNEDDEN.<sup>370</sup> STANIŠIĆ confirmed during a meeting with BABIĆ in August 1991 that "Captain Dragan was in their service",<sup>371</sup> their "chief training instructor".<sup>372</sup>

<sup>360</sup> See e.g. [P00250](#), p.1-3; [P01962](#), p.2; [P03279](#); [1D00089](#), p.5; [P03312](#).

<sup>361</sup> [P01962](#), p.2.

<sup>362</sup> Cross-reference Section [II.E.4\(a\)\(i\)](#); Section [II.F.1\(b\)\(ii\)](#). See e.g. [REDACTED]; [P00250](#), p.1,3; [P01962](#), p.2. See also [P01961](#), p.1; [P00059](#)(Clip 1, 00:25:28-00:26:03), p.5; [P00247](#); [2D00015](#), p.4-5; RJS-07:T.26-28(27-Aug-2019).

<sup>363</sup> [REDACTED]. See also MAKSIĆRadoslav:[P00025](#), para.105; MAKSIĆRadoslav:T.74-75(22-Jun-2017).

<sup>364</sup> Cross-reference Section [II.E.4\(a\)\(i\)-\(iii\)](#); Section [II.F.1\(c\)\(ii\)a-b](#); Section [III.B.1\(b\)\(i\)-\(ii\)](#). See e.g. [REDACTED]; [P01963](#); THEUNENSReynaud:T.21-22(7-Mar-2018); BABIĆMilan:[P01246](#), T.13163-13164; [REDACTED].

<sup>365</sup> [REDACTED].

<sup>366</sup> [REDACTED]. See also RFJ-066:T.28(10-Jul-2017); [REDACTED]; BABIĆMilan:[P01243](#), p.17.

<sup>367</sup> BABIĆMilan:[P01246](#), T.13163-13164; [REDACTED].

<sup>368</sup> [REDACTED].

<sup>369</sup> [P01963](#); THEUNENSReynaud:T.21-22(7-Mar-2018).

<sup>370</sup> [P00248](#), p.2; [REDACTED].

<sup>371</sup> BABIĆMilan:[P01246](#), T.13528.

<sup>372</sup> [P00021](#), p.3.

93. After leaving Krajina at the beginning of August 1991,<sup>373</sup> Captain DRAGAN<sub>(DB)</sub> continued to operate under the authority of the Accused,<sup>374</sup> confirming at the end of 1991 that he had “obligations towards the State Security of the Republic of Serbia” and that his activities had to be “fully in accordance with the mentioned service”.<sup>375</sup> Under the Accused’s continuing authority, in August 1991 Captain DRAGAN<sub>(DB)</sub> established a Unit base and training camp at Tikveš,<sup>376</sup> using instructors who were under the command of the Accused.<sup>377</sup> The fact that Vasilje MIJOVIĆ<sub>(DB)</sub>, who the Accused had brought to Baranja, was also part of Captain DRAGAN’s<sub>(DB)</sub> Unit further establishes that he was operating under the Accused.<sup>378</sup> Around September 1991, Captain DRAGAN<sub>(DB)</sub> founded the KDF,<sup>379</sup> which **SIMATOVIĆ** characterised as the Unit’s humanitarian arm,<sup>380</sup> but which the Accused also used to recruit members for the Unit.<sup>381</sup>

94. The Accused’s authority over Captain DRAGAN<sub>(DB)</sub> continued in 1992. In February 1992, the SMUP directed five instructors from Captain DRAGAN’s<sub>(DB)</sub> Unit,[REDACTED],<sup>382</sup> including Božo and Rade BOŽIĆ<sub>(DB)</sub>, to establish a camp and train local Serbs in Brčko.<sup>383</sup> In June 1992, **SIMATOVIĆ** sent Živojin IVANOVIĆ<sub>(DB)</sub>, [REDACTED]<sup>384</sup> [REDACTED],<sup>385</sup> to lead the Unit, including Captain DRAGAN’s<sub>(DB)</sub> men, in Brčko.<sup>386</sup> At the same time, Captain DRAGAN<sub>(DB)</sub> continued to work for the

<sup>373</sup> [P00250](#), p.2; [REDACTED].

<sup>374</sup> [P00057](#), p.1; MAKSIĆRadoslav:[P00025](#), para.105; MAKSIĆRadoslav:T.74-75(22-Jun-2017). *See also e.g.* [P00250](#), p.3(According to a SSNO Security Administration report of 28 August 1991, there were “relations between SNEDDEN and the MUP of Serbia”); [P01962](#), p.2-3(Captain DRAGAN<sub>(DB)</sub> stated that his future “engagement must and should serve within the system-frame, regarding the myth that has been created about him” and that “[h]e wants to secure status of a volunteer within the system”, indicating that he pursued a continuing working relationship with the Accused); [P02773](#), p.3(In late August, a BiH SDS official spoke to people in Serbia “about giving us this guy [Dragan] for a short while”, suggesting that he was still engaged by the Accused at the time); NIELSENChristian:[P00850](#), para.515; [P02780](#)(In late November 1991, **STANIŠIĆ** told KARADŽIĆ that he was with “Frenki and Captain” and that he hoped they would get to work with KARADŽIĆ, demonstrating that he intended to engage Captain DRAGAN<sub>(DB)</sub> and **SIMATOVIĆ** to assist KARADŽIĆ); [P01505](#), p.3; [1D01376](#), p.11-12.

<sup>375</sup> [P00057](#), p.1.

<sup>376</sup> *Cross-reference* Section [II.E.4\(b\)\(i\)](#). *See e.g.* [REDACTED]; [REDACTED]; [P02704](#), p.21. *See also* [REDACTED].

<sup>377</sup> [REDACTED]; [P00264](#), p.7,13; [P00258](#), p.7-8,12,28.

<sup>378</sup> [REDACTED]; VASILJEVIĆAleksandar:T.43(31-Jan-2019); [REDACTED]; [P02690](#).

<sup>379</sup> [REDACTED].

<sup>380</sup> [P00256](#)(00:17:05-00:17:40), p.11. *See also* [REDACTED].

<sup>381</sup> [1D00061](#), p.18; [REDACTED].

<sup>382</sup> [REDACTED].

<sup>383</sup> *Cross-reference* Section [II.E.4\(c\)\(i\)](#); Section [II.F.4\(b\)\(ii\)b](#). *See e.g.* [1D00034](#), p.3; [P03279](#), p.5; [REDACTED]; THEUNENSReynaud:[P01980](#), p.486.

<sup>384</sup> [REDACTED].

<sup>385</sup> [REDACTED].

<sup>386</sup> *Cross-reference* Section [II.D.2\(a\)\(iii\)b](#); Section [II.E.4\(c\)\(i\)](#); Section [II.F.4\(b\)\(ii\)b](#). *See e.g.* [REDACTED].



Accused in Divič,<sup>387</sup> where he established a camp by June 1992<sup>388</sup> with Unit members from Knin.<sup>389</sup> The camp commander, who ran the camp under Captain DRAGAN<sub>(DB)</sub>,<sup>390</sup> was chastised by the SerbianDB for broadcasting his links to “Frenki” and the SMUP.<sup>391</sup> During this period, Captain DRAGAN<sub>(DB)</sub> regularly met with BOŽOVIĆ<sub>(DB)</sub> while the latter was engaged in Doboј, to coordinate for the Corridor operations.<sup>392</sup> In 1993, Captain DRAGAN<sub>(DB)</sub> trained a number of recruits at Alfa camp in Knin,<sup>393</sup> who became members of the Unit’s *Poskok* Detachment in 1995.<sup>394</sup>

95. The Accused’s close and enduring relationship with Captain DRAGAN<sub>(DB)</sub> was evident at the KOSTIĆ Centre ceremony in 1997, during which STANIŠIĆ embraced Captain DRAGAN<sub>(DB)</sub><sup>395</sup> and SIMATOVIĆ acknowledged the Unit’s work with the KDF “throughout the entire period”.<sup>396</sup> Demonstrating his familiarity with the SerbianDB, Captain DRAGAN<sub>(DB)</sub> noticed that the SerbianDB’s entire leadership was filmed during the award ceremony.<sup>397</sup>

(b) The Accused had authority over KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub>, which they used to further the CCP

96. The Accused made many of their JCE contributions through Rade KOSTIĆ<sub>(DB)</sub> and Ilija KOJIĆ<sub>(DB)</sub>—establishing, arming, and leading Serb police and TO units that furthered the CCP and subverting SBWS-MUP structures to facilitate criminality. Through KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub>, the Accused exercised authority within the SAO-

<sup>387</sup> [P01949](#), p.2; THEUNENSReynaud:T.66(6-Mar-2018); THEUNENSReynaud:T.76-78(14-Mar-2018); THEUNENSReynaud:T.12(15-Mar-2018); NIELSENChristian:[P00850](#), para.730; NIELSENChristian:T.69(23-Nov-2017); [REDACTED]. See [P02780](#); [P01505](#), p.3; [P03597](#), p.1. Captain DRAGAN<sub>(DB)</sub> came to Divič “under the auspices of the [fund] indicating that the Captain Dragan Fund provided cover for the training camps Captain Dragan operated for the Accused.” See [P02888](#), p.266-267.

<sup>388</sup> Cross-reference Section [II.E.4\(d\)\(i\)](#); Section [II.F.4\(b\)\(i\)b.iv](#). See e.g. [P03583](#), p.1; [REDACTED]; MILOVANOVIĆManojlo:[P02935](#), T.15373; NIELSENChristian:[P00850](#), para.730.

<sup>389</sup> Stanišić “accept[s], there is no dispute Captain Dragan had a training centre with Red Berets at the Divič training centre”:T.78(14-Mar-2018). See [REDACTED]; [P01949](#), p.2; THEUNENSReynaud:T.66(6-Mar-2018); MILOVANOVIĆManojlo:[P02934](#), T.4381-4382,4492; MILOVANOVIĆManojlo:[P02935](#), T.15373. See also [P02888](#), p.268; [REDACTED].

<sup>390</sup> [2D00155](#); [P03589](#); THEUNENSReynaud:[P01980](#), p.459,461;[P02888](#), p.250.

<sup>391</sup> See [1D00097](#); THEUNENSReynaud:[P01980](#), p.460; THEUNENSReynaud:T.22-23(15-Mar-2018).

<sup>392</sup> [REDACTED]; RFJ-165:T.28-29(29-May-2018). Cross-reference Section [II.F.4\(b\)\(ii\)c](#).

<sup>393</sup> [P00059](#)(Clip 1, 01:07:37-01:07:52), p.26; [P03446](#); [REDACTED]; [P03068](#); [REDACTED]; [P00330](#)(00:00:00-00:04:31); [REDACTED]; [P03467](#), p.1,3,5-6; [1D00089](#).

<sup>394</sup> [P02865](#), p.1-2; [P02870](#), p.1,3-4,19.

<sup>395</sup> [P00256](#)(00:43:18-00:43:54), p.27.

<sup>396</sup> [P00256](#)(00:17:05-00:17:14), p.11.

<sup>397</sup> [P00059](#)(Clip 2, 00:46:48-00:46:59), p.49.

SBWS-MUP structures [REDACTED],<sup>398</sup> which the Accused cemented by officially establishing them as Assistant Ministers of Interior in RSK in 1992.<sup>399</sup> The actions of KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub> are attributable to the Accused, who exercised continuous authority over them:

- **STANIŠIĆ** and **SIMATOVIĆ** exercised authority over KOSTIĆ<sub>(DB)</sub>—officially a SerbianDB operative from December 1990 until his death on 21 November 1994<sup>400</sup>—and used him to effect their JCE contributions in Croatia and BiH.<sup>401</sup> **SIMATOVIĆ**'s authority over KOSTIĆ<sub>(DB)</sub> was clear from the moment KOSTIĆ<sub>(DB)</sub> joined the SerbianDB, when **SIMATOVIĆ** involved him in covertly arming Serb forces late 1990, [REDACTED].<sup>402</sup> KOSTIĆ<sub>(DB)</sub> was formally in **SIMATOVIĆ**'s 2<sup>nd</sup> Administration by 1993.<sup>403</sup>
- The Accused exercised authority over KOJIĆ<sub>(DB)</sub>, as a SerbianDB associate, from the time the SerbianDB coopted him as an associate in the summer of 1990 and throughout the Indictment period,<sup>404</sup> officially bringing him under **SIMATOVIĆ** in the SerbianDB 2<sup>nd</sup> Administration in April 1993.<sup>405</sup>

97. KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub> operated at the Accused's behest. [REDACTED].<sup>406</sup> Witnesses who interacted with KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub> observed that they were operating under the Accused. [REDACTED],<sup>407</sup> [REDACTED].<sup>408</sup> [REDACTED]<sup>409</sup> [REDACTED].<sup>410</sup>

<sup>398</sup> Cross-reference Section [II.F.2\(b\)](#).

<sup>399</sup> Cross-reference Section [II.F.3\(b\)](#).

<sup>400</sup> [P00522](#), p.6,21-24,64-67.

<sup>401</sup> KRSMANOVICDragoslav:T.8-9(1-Oct-2019). Cross-reference Section [II.E.3\(a\)\(i\)](#),(iv); Section [II.F.2\(b\)](#)-(d); Section [II.F.3](#).

<sup>402</sup> [REDACTED]. Cross-reference Section [II.E.3\(a\)\(i\)](#),(iv).

<sup>403</sup> [P00522](#), p.81-82(p.57-58(BCS))(As head of the 2<sup>nd</sup> Administration organisational unit, Simatović signed Kostić's 1993 employee evaluation); AnnexF, p.5-6.

<sup>404</sup> KOJIĆ<sub>(DB)</sub> worked informally for the SerbianDB from 1990, and formally for the SerbianJB from 1 November 1991 until his official transfer to the SerbianDB on 1 April 1993. In actuality, he continuously worked for **STANIŠIĆ**'s SerbianDB from summer 1990 until the end of the Indictment Period. See [P00569](#), 12-15; [P00481](#), p.3; [REDACTED]; SAVIĆBorivoje:[P00449](#), para.44-45,47; SAVIĆBorivoje:T.11-12,114-115(14-Sep-2017); BOGUNOVIĆNebojša:T.48(3-Sep-2019); [REDACTED].

<sup>405</sup> [P00569](#), p.12-15; [P03195](#), p.6.

<sup>406</sup> [REDACTED]. Cross-reference Section [II.F.2\(d\)\(i\)](#)-(iii).

<sup>407</sup> [REDACTED].

<sup>408</sup> [REDACTED].

<sup>409</sup> [REDACTED].

<sup>410</sup> [REDACTED].

98. **STANIŠIĆ** exercised authority over **KOSTIĆ<sub>(DB)</sub>** and **KOJIĆ<sub>(DB)</sub>**, in the same way that he had and exercised authority over any member of the SerbianDB.<sup>411</sup> He actively ensured that they retained their high-level positions in the RSK.<sup>412</sup> It was clear to RSK political and military authorities that **STANIŠIĆ** was “pulling the strings” through **KOSTIĆ<sub>(DB)</sub>** and **KOJIĆ<sub>(DB)</sub>**.<sup>413</sup> **MARTIĆ**—despite being the RSK-MUP Minister and then the RSK President [REDACTED].<sup>414</sup>

99. In September 1994, for instance, **STANIŠIĆ** successfully intervened to obstruct RSK-MUP Minister Ilija **PRIJIĆ**’s attempt to remove **KOSTIĆ<sub>(DB)</sub>** from his position of RSK Assistant Minister of Interior.<sup>415</sup> Further demonstrating the Accused’s authority, RSK-DB Chief **DRAČA<sub>(DB)</sub>** reported to the SerbianDB about this situation—reporting outside his “RSK chain of command without the knowledge of **MARTIĆ**”.<sup>416</sup> Soon after, **PRIJIĆ**—who had been warned that his “move would cause a split between the MUP RSK and MUP Serbia”<sup>417</sup>—was dismissed and the post of RSK Minister of Interior left vacant until August 1995.<sup>418</sup> The RSK-MUP was left in the hands of **STANIŠIĆ**’s operatives **KOSTIĆ<sub>(DB)</sub>** (until his death) and **KOJIĆ<sub>(DB)</sub>**.<sup>419</sup> **STANIŠIĆ** considered that the SerbianDB had “invested too much in [the Krajina/RSK-MUP]”, and advocated with **MILOŠEVIĆ** to ensure the RSK-MUP would not be “relinquished to somebody else”.<sup>420</sup>

(c) The Accused had authority over Marko **PAVLOVIĆ<sub>(DB)</sub>**, which they used to further the CCP in Zvornik

100. **STANIŠIĆ** and **SIMATOVIĆ** exercised authority over Branko **POPOVIĆ<sub>(DB)</sub>**, who acted at their behest as he armed Serb Forces in Zvornik in 1991-1992 and commanded the Zvornik TO in a campaign of violence and persecution targeting non-

<sup>411</sup> KRSMANOVIĆDragoslav:T.8-9(1-Oct-2019); [P00522](#), p.6,21-24; [P00569](#), p.12-15; [P00481](#), p.3.

<sup>412</sup> **DRAČA**Aco:T.36-40(3-Dec-2019); [P03818](#); [REDACTED]; [REDACTED].

<sup>413</sup> [REDACTED]. See [P00222](#); [REDACTED]; [1D00037](#), p.99; **DRAČA**Aco:T.16-18(3-Dec-2019); [REDACTED]. See also e.g. [REDACTED]; [P02349](#); [P02350](#), p.1; [P02350](#), p.1.

<sup>414</sup> [REDACTED].

<sup>415</sup> [P03818](#), p.1(p.1(BCS)) (“NRDB” followed by “Jovica” is handwritten at the top of the report); **DRAČA**Aco:T.35-36(confirming that “NRDB” means that the report was to be sent to **STANIŠIĆ** as head of the SerbianDB),40(3-Dec-2019). See also [REDACTED].

<sup>416</sup> **DRAČA**Aco:T.38-39(3-Dec-2019).

<sup>417</sup> [P03818](#).

<sup>418</sup> **BABIĆ**Milan:[P01246](#), T.13249.

<sup>419</sup> **BABIĆ**Milan:[P01246](#), T.13249; **ĐUKIĆ**Petar:T.10(21-Jan-2020); [REDACTED]; [P03821](#), p.1; [P03822](#), p.1.

<sup>420</sup> **BABIĆ**Milan:[P01246](#), T.13249-13251; [P01293](#).

Serbs, using the alias Marko PAVLOVIĆ<sub>(DB)</sub>, from April to July 1992. [REDACTED].<sup>421</sup>  
 [REDACTED].<sup>422</sup>

101. In addition, PAVLOVIĆ<sub>(DB)</sub>'s associations with numerous SerbianDB operatives and associates demonstrate that he operated under the Accused's behest in Croatia and BiH. [REDACTED].<sup>423</sup> In mid-1992 he attended a meeting arranged by SIMATOVIĆ with Bosnian Serb Crisis Staff heads in Bajina Bašta, Serbia, even though he was not a Crisis Staff head.<sup>424</sup> PAVLOVIĆ<sub>(DB)</sub> had frequent contacts with other SerbianDB operatives and associates, [REDACTED].<sup>425</sup>

102. Moreover, despite having no prior contacts with Zvornik until he was brought there by KOSTIĆ<sub>(DB)</sub>, PAVLOVIĆ<sub>(DB)</sub> was appointed Zvornik TO commander on 28 April 1992,<sup>426</sup> and exercised extraordinary authority over local Serb leaders and armed paramilitaries even before his appointment.<sup>427</sup> [REDACTED].<sup>428</sup> [REDACTED].<sup>429</sup>

**2. STANIŠIĆ and SIMATOVIĆ controlled the Unit, SDG and Scorpions, which they used for crimes furthering the CCP**

103. The Accused had authority over three SerbianDB special units: (i) the JPN/JATD/JSO, commonly known as "Frenki's Men"/*frenkijevci* or "Red Berets",<sup>430</sup> and referred to in this Brief as the "Unit"; (ii) the SDG, commonly known as ARKAN's Tigers or *arkanovci*; and (iii) the Scorpions. The Scorpions and SDG acted as "satellite units" of the Unit.<sup>431</sup> The Accused used these units to commit horrific crimes that advanced the CCP, and these units' actions are attributable to the Accused.

<sup>421</sup> [REDACTED]. See also [P00837](#), p.2.

<sup>422</sup> [REDACTED]. See also [P00837](#), p.2.

<sup>423</sup> [REDACTED]; RFJ-109:[P01787](#).

<sup>424</sup> DERONJIĆ Miroslav: [P01717](#), para.134-135.

<sup>425</sup> [REDACTED]; MUJIĆ Fadil: T.35-36(27-Feb-2018).

<sup>426</sup> [P03564](#), p.1. See also [P03567](#), p.1; [P03573](#), p.1.

<sup>427</sup> [REDACTED]; [P01687](#).

<sup>428</sup> [REDACTED].

<sup>429</sup> See [REDACTED].

<sup>430</sup> [REDACTED]; RFJ-150:T.10(22-May-2018); RFJ-150:T.55(23-May-2018); [REDACTED]. See also [REDACTED]; ANASTASIJEVIĆ Dejan: [P02423](#), para.93.

<sup>431</sup> STOPARIĆ Goran: [P00796](#), para.70-72; [REDACTED].

(a) STANIŠIĆ and SIMATOVIĆ had authority over the Unit they created, which they used to advance the CCP

104. Responding to MILOŠEVIĆ’s call for “appropriate formations” to defend Serb interests outside of Serbia,<sup>432</sup> the Accused established the Unit on 4 May 1991 and used it throughout the Indictment period to murder, persecute, and forcibly displace non-Serbs from targeted territories in Croatia and BiH.

105. Under both Accused’s control, with **SIMATOVIĆ** as its Commander,<sup>433</sup> the Unit existed throughout the Indictment period: from its formation in May 1991, when it was known as the SMUP Special Purpose Unit (“JPN”), through its formalisation as the Unit for Anti-Terrorist Activities (“JATD”) in August 1993, and its reconfiguration as the Unit for Special Operations (“JSO”) in 1996. **SIMATOVIĆ** publicly confirmed the existence and continuity of the Unit throughout the Indictment period in 1997, during the KOSTIĆ Centre ceremony held by the Accused at the Rade KOSTIĆ Centre, the new JSO headquarters in Kula, Serbia. At that ceremony, **SIMATOVIĆ** praised the Unit for its successful operations from 1991 through 1995, throughout the “entire ethnic area” of “the Serbian people”.<sup>434</sup>

106. The purpose of this Section is twofold: to demonstrate how the evidence establishes the continuity of the Unit and, in doing so, to establish the Accused’s uninterrupted authority over it, particularly during operations in which they committed the charged crimes. Following the Unit’s activities chronologically, highlighting key Unit commanders and members, and tracking their movements to camps and operations, this Section demonstrates the consistency of the Unit’s command, membership, function, and purpose, always at the behest of the Accused, from 1991 to 1995. Aside from commanders and key perpetrators, the most notable Unit members are set out in the footnotes in this Section and given full treatment in Annex A. This Section references the Unit’s training camps as necessary to track the Unit’s evolution and establish the Accused’s unwavering authority, but the camps and the Accused’s training scheme are fully addressed in Section II.E.4.

<sup>432</sup> [P02439](#), p.1; NIELSENChristian:[P00850](#), para.436; NIELSENChristian:T.21-22(14-Nov-2017).

<sup>433</sup> [REDACTED]; SLIŠKOVIĆDejan:[P02538](#), para.3-4; [REDACTED]; SLIŠKOVIĆDejan:T.65(11-Jul-2018); SLIŠKOVIĆDejan:T.5,7-8(18-Jul-2018); [REDACTED]; RFJ-083:T.60-61(10-May-2018); RFJ-083:T.37-38(8-May-2018); RFJ-066:T.41(10-Jul-2017); [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.73; [P00059](#), p.16; [P00256](#)(00:13:14-00:13:20), p.9.

<sup>434</sup> [P00256](#), p.3-4,9,12. *See also* [REDACTED]. *Cross-reference* AnnexB.

107. As set out below, the Accused's continuous authority over the Unit is evident from, *inter alia*:

- the Accused's own words informing the Unit that they were the Unit's commanders;
- Unit members' understanding of the Accused as their commanders, including during deployments, and the chain of command through Unit commanders who took orders from the Accused;
- the colloquial names for their group—whether “Frenki's men”, “Red Berets” owing to their distinctive red berets, “*Knindžes*” owing to their Golubić/Knin training, or “Grey Wolves” reflecting the Unit's distinctive insignia;
- the Unit's SMUP IDs;
- the Unit's uniforms with the SerbianDB sword and the Unit's Grey Wolf insignia—the same insignia found on **SIMATOVIĆ**'s uniform;
- the Unit's privileged status, as manifested in their impunity vis-à-vis local police and their ability to freely cross borders; and
- the documentation the Accused maintained on the Unit, as reflected in Unit members' personnel files and paylists.

(i) The Accused founded the SerbianDB Unit on 4 May 1991 to operate under **SIMATOVIĆ**'s command for pursuing the CCP

108. **STANIŠIĆ** and **SIMATOVIĆ** created their Unit at their flagship training camp in Golubić, in SAO-Krajina. **SIMATOVIĆ** selected “the smartest and most disciplined men” who had trained under their lead instructor, Captain DRAGAN<sub>(DB)</sub>,<sup>435</sup> with the assistance of SerbianDB operatives Milan RADONJIĆ<sub>(DB)</sub> and FILIPOVIĆ<sub>(DB)</sub>,<sup>436</sup> to be

<sup>435</sup> [REDACTED]. *Cross-reference* Section [II.E.4\(a\)\(i\)](#); Section [II.F.1\(b\)\(ii\)](#).

<sup>436</sup> [REDACTED]; RFJ-066:T.28-29(10-Jul-2017); BABIĆMilan:[P01246](#), T.13502.

the “core” of the Unit.<sup>437</sup> Although the Unit was not formed in a day, the Accused deemed 4 May 1991 to be the Unit’s founding date.<sup>438</sup>

109. [REDACTED]<sup>439</sup> [REDACTED].<sup>440</sup> However, SerbianDB personnel files reflect that the SerbianDB and several original Unit members considered their membership in the Unit to commence from their training at Golubić, with the earliest members joining on the official founding date of 4 May 1991.<sup>441</sup> Radojica BOŽOVIĆ<sub>(DB)</sub>, Živojin IVANOVIĆ aka Žika CRNOGORAC<sub>(DB)</sub>, and Zoran RAIĆ<sub>(DB)</sub> were among the original members who became the Unit’s core.<sup>442</sup> [REDACTED],<sup>443</sup> commanding the Unit in violent operations to expel countless non-Serb civilians from Serb-claimed territory in the years that followed.<sup>444</sup> When the Accused moved their weapons and command to Knin Fortress in mid-1991,<sup>445</sup> SIMATOVIĆ took the Unit and Captain DRAGAN<sub>(DB)</sub> with him.<sup>446</sup>

110. SIMATOVIĆ was in command from the beginning, starting with the Unit’s first round of operations to displace non-Serbs: Ljubovo,<sup>447</sup> Glina, and Struga,<sup>448</sup> to which the Unit deployed from the Šamarica camp established to facilitate these operations.<sup>449</sup> During this period, Unit members operated under Captain DRAGAN<sub>(DB)</sub>’s direct

<sup>437</sup> [REDACTED]; [P00248](#), p.1; NIELSENChristian:[P00850](#), para.177; [P00256](#)(00:14:52-00:15:18), p.10.

<sup>438</sup> [P00256](#)(00:13:14-00:13:20), p.9; NIELSENChristian:[P00850](#), para.177.

<sup>439</sup> [REDACTED]. See also [REDACTED].

<sup>440</sup> [REDACTED].

<sup>441</sup> [P02864](#), p.14,21-22; [P00259](#), p.14; [P00260](#), p.1,3-5; [P00266](#), p.8; [P00262](#), p.7,11; [P00265](#), p.9; [P00261](#), p.5. See [REDACTED]. See also [P02598](#), p.33.

<sup>442</sup> Other core Unit members included [REDACTED], [REDACTED], Slobodan MAJSTOROVIĆ<sub>(DB)</sub>, [REDACTED], Dragan OLUIĆ<sub>(DB)</sub>, Nikola PILIPOVIĆ<sub>(DB)</sub>, Nikola PUPOVAC<sub>(DB)</sub>, Nikola SIMIĆ<sub>(DB)</sub>, Davor SUBOTIĆ<sub>(DB)</sub>, Borjan VUČKOVIĆ<sub>(DB)</sub>, Ilija VUČKOVIĆ<sub>(DB)</sub>. Cross-reference AnnexA. See also [REDACTED].

<sup>443</sup> [REDACTED]; SLIŠKOVIĆDejan:[P02538](#), para.3.

<sup>444</sup> Cross-reference Section [II.F.1](#)-2,4-5; Section [III.B.1](#),2; Section [III.C](#),3-4.

<sup>445</sup> [REDACTED]; [P00211](#)(signed by SIMATOVIĆ, corroborates that the Unit command was at Knin Fortress with their weaponry by 16 June); NIELSENChristian:T.57(23-Nov-2017); THEUNENSReynaud:T.31(7-Mar-2018). See also [REDACTED]; BABIĆMilan:[P01248](#), T.1437.

<sup>446</sup> [REDACTED]; [P00011](#); [REDACTED]; [P00059](#)(Clip 1, 00:31:12-00:31:42), p.8; [P00271](#), p.1-2; [P01970](#); [REDACTED]. Personnel files confirm that unit members moved from Golubić to the Knin Fortress, and that the unit was billeted at the Knin Fortress, see e.g. [P00258](#), p.12,28; [P00264](#), p.13,20; [P00500](#), p.16.

<sup>447</sup> Unit members who participated in operations in Ljubovo included: Živojin IVANOVIĆ<sub>(DB)</sub>, Saša MEDAKOVIĆ<sub>(DB)</sub>, Dragan OLUIĆ<sub>(DB)</sub>, Nikola PUPOVAC<sub>(DB)</sub>, [REDACTED], and Borjan VUČKOVIĆ<sub>(DB)</sub>. Cross-reference AnnexA.

<sup>448</sup> Unit members who participated in operations in Glina included: Živojin IVANOVIĆ<sub>(DB)</sub>, Saša MEDAKOVIĆ<sub>(DB)</sub>, Dragan OLUIĆ<sub>(DB)</sub>, Nikola PILIPOVIĆ<sub>(DB)</sub>, Nikola PUPOVAC<sub>(DB)</sub>, Nikola SIMIĆ<sub>(DB)</sub>, [REDACTED], Borjan VUČKOVIĆ<sub>(DB)</sub>, and Ilija VUČKOVIĆ<sub>(DB)</sub>. Cross-reference AnnexA. See also e.g. [P00500](#), p.16.

<sup>449</sup> [1D00047](#), p.1; THEUNENSReynaud:T.26-27(7-Mar-2018); [REDACTED]. See AF178. Cross-reference Section [II.E.4\(a\)](#); Section [II.F.1\(c\)\(ii\)](#).



command as a discrete and special unit. The headers of their reports after the Glina/Operation Žaoka operation refer to either the Special Purpose Unit (JPN)<sup>450</sup> or Special Operations Unit<sup>451</sup> of both the Republic of Serbia and SAO-Krajina, and refer to individual “special unit member[s]”<sup>452</sup> and “the special unit”.<sup>453</sup> **SIMATOVIĆ**’s subsequent report that “[a] part of the special unit from Glina *has returned* and we are writing a report” reveals **SIMATOVIĆ**’s personal responsibility for the Unit.<sup>454</sup> Given his position as the Unit’s commander, **SIMATOVIĆ** knew the Serb Forces expelled non-Serbs during this operation, and years later celebrated it as among the Unit’s earliest successes during the KOSTIĆ Centre ceremony.<sup>455</sup>

111. In August 1991, the Accused expanded the Unit’s presence into SBWS just as Serb Forces had begun their persecutory campaign there, establishing a base in Tikveš, Baranja, [REDACTED].<sup>456</sup> From Tikveš they deployed to expel non-Serbs from Bilje.<sup>457</sup> Vasilje MIJOVIĆ<sub>(DB)</sub>, who would become one of the Accused’s most reliable commanders, commanded the Unit in Baranja in autumn 1991.<sup>458</sup> In Baranja, the Unit wore red berets and was called “Red Berets”, “*Knindžes*”, or “Frenki’s men”.<sup>459</sup>

112. Also in summer 1991, **SIMATOVIĆ**’s immediate subordinate, Dragan FILIPOVIĆ<sub>(DB)</sub>, established a command centre and training camp in Korenica, Krajina, from which **SIMATOVIĆ** commanded the Unit’s persecutory attacks in Lovinac, Škradin, and Plitvice.<sup>460</sup> In Korenica, the Unit were also known as “Frenki’s men”; [REDACTED].<sup>461</sup>

<sup>450</sup> [1D00032](#); [1D00064](#); [P01986](#); [P03237](#); [P03236](#); [P03232](#), p.1-2.

<sup>451</sup> [P01985](#); [P03230](#).

<sup>452</sup> [1D00047](#), p.2.

<sup>453</sup> [P01986](#).

<sup>454</sup> [P00843](#)(emphasis added); NIELSENChristian:T.45-46(15-Nov-2017).

<sup>455</sup> [P00256](#), p.10.

<sup>456</sup> [REDACTED] [P00530](#); [REDACTED]. *See also* [REDACTED].

<sup>457</sup> *Cross-reference* Section [II.F.2\(f\)\(ii\)c](#). Unit members who participated in operations in Bilje included: Vaso MIJOVIĆ<sub>(DB)</sub>, [REDACTED], and Nikola PILIPOVIĆ<sub>(DB)</sub>. *Cross-reference* AnnexA. *See also e.g.* [P00500](#), p.4; [P00264](#), p.7.

<sup>458</sup> VASILJEVIĆAleksandar:T.30-31,43(31-Jan-2019); [REDACTED]; [REDACTED]; [REDACTED]; [P02690](#). *See* [P01974](#), p.2.

<sup>459</sup> [REDACTED].

<sup>460</sup> [REDACTED]. *See also* [P00258](#), p.12-13; [REDACTED]; [P00500](#), p.16. Unit members participating in operations in Lovinac, Škradin and/or Plitvice included: Dragan OLUIĆ<sub>(DB)</sub>, Nikola PILIPOVIĆ<sub>(DB)</sub>, and [REDACTED]. *Cross-reference* AnnexA. *See also e.g.* [P00500](#), p.16; [P00262](#), p.11.

<sup>461</sup> [REDACTED].



(ii) At SerbianDB camps in Ležimir and Pajzoš, the Accused took administrative steps to formalise the Unit

113. [REDACTED].<sup>462</sup> [REDACTED]<sup>463</sup> [REDACTED].<sup>464</sup> [REDACTED]<sup>465</sup>  
 [REDACTED].<sup>466</sup> [REDACTED].<sup>467</sup> [REDACTED]<sup>468</sup> [REDACTED]<sup>469</sup>  
 [REDACTED].<sup>470</sup>

114. At Ležimir, the Unit received instructions from the “Belgrade headquarters”<sup>471</sup> — evidently referring to the Accused’s SerbianDB offices—[REDACTED] after deploying from Ležimir for operations furthering the CCP in SBWS.<sup>472</sup> Having established himself through his Krajina crimes, IVANOVIĆ<sub>(DB)</sub> was [REDACTED]<sup>473</sup> and the Unit’s commander at Ležimir.<sup>474</sup> Unit members wore red berets and were known as the “Red Berets”.<sup>475</sup>

115. By November 1991,<sup>476</sup> the Unit had established their Pajzoš camp and IKM in SBWS, just across the border from Ležimir.<sup>477</sup> STANIŠIĆ and SIMATOVIĆ frequented the Pajzoš camp throughout the Indictment period.<sup>478</sup> As IVANOVIĆ’s<sub>(DB)</sub> deputy, BOŽOVIĆ<sub>(DB)</sub> commanded the Pajzoš IKM.<sup>479</sup> The Unit was known locally as [REDACTED], “Red Berets”, and later “Frenki’s men”/“frenkijevci”.<sup>480</sup>

<sup>462</sup> [REDACTED].

<sup>463</sup> [REDACTED].

<sup>464</sup> [REDACTED].

<sup>465</sup> [REDACTED].

<sup>466</sup> [REDACTED]; NIELSENChristian:[P00850](#), para.190; [REDACTED].

<sup>467</sup> [REDACTED].

<sup>468</sup> [REDACTED].

<sup>469</sup> [REDACTED].

<sup>470</sup> [REDACTED].

<sup>471</sup> [P00260](#), p.31-32.

<sup>472</sup> [REDACTED]. *Cross-reference* Section [II.F.2\(f\)\(ii\)](#). Unit members who participated in these operations included: Dragan OLUIĆ<sub>(DB)</sub>, Nikola PILIPOVČ<sub>(DB)</sub>; Nikola PUPOVAC<sub>(DB)</sub>, [REDACTED]. *Cross-reference* AnnexA. *See also e.g.* [P02709](#), p.14; [P00500](#), p.16.

<sup>473</sup> [REDACTED].

<sup>474</sup> [P03780](#), p.4; [REDACTED]; [P00059](#)(00:55:30-00:55:37), p.20; [P03036/P03064](#)(duplicates). *See also* [REDACTED].

<sup>475</sup> [REDACTED].

<sup>476</sup> [REDACTED].

<sup>477</sup> *Cross-reference* Section [II.E.4\(b\)\(iii\)](#).

<sup>478</sup> [REDACTED]; LUČIĆMiroslav:T.26-28(8-Sep-2020); [REDACTED]; KRSMANOVIĆDragoslav:T.15(1-Oct-2019); KRSMANOVIĆDragoslav:T.15(3-Oct-2019); PLAHUTADejan:T.65-66(19-Nov-2019); STEVANOVIĆObrad:T.41(1-Oct-2020); [P00817](#), p.1-3.

<sup>479</sup> [REDACTED]; [P00260](#), p.23,30,32; [REDACTED]. *See also* [REDACTED].

<sup>480</sup> [REDACTED]; RFJ-150:T.10(22-May-2018); RFJ-150:T.55(23-May-2018); [REDACTED]. *See also* BOGUNOVIĆBorislav:[P02720](#), T.5998-5999; [REDACTED]; [P03381](#), p.1.

116. The Unit's records reveal that the Unit was developing organisational standards and procedures related to its members while based in Ležimir and Pajzoš. Unit members formally applied to the JPN in early 1992 in Ležimir<sup>481</sup> and in Pajzoš by April/May,<sup>482</sup> submitting autobiographies and applications to the Unit.<sup>483</sup> During this process, Unit members confirmed when they had joined the Unit and which operations they had already participated in.<sup>484</sup> On 28 February 1992, **STANIŠIĆ** requested background checks for candidates for the "Special Unit of the Serbian MUP"—many of whom were already Unit members, [REDACTED].<sup>485</sup> Unit members were issued official SMUP identification cards,<sup>486</sup> even when the background checks conducted at **STANIŠIĆ**'s request revealed criminal convictions.<sup>487</sup>

117. Local authorities knew of the Unit's affiliation with the SerbianDB,<sup>488</sup> which gave the Unit impunity in the area.<sup>489</sup> Although Ležimir and Pajzoš were on different sides of the border, Unit members regularly and easily moved between the camps.<sup>490</sup> With the appointment of **STANIŠIĆ**'s operatives KOJIĆ<sub>(DB)</sub> and KOSTIĆ<sub>(DB)</sub> as RSK Assistant Ministers of Interior,<sup>491</sup> the Unit could rest assured that RSK-MUP authorities would not interfere with their crimes against non-Serbs.<sup>492</sup>

a. The Unit in Pajzoš concealed its affiliation with the SerbianDB, remaining under the Accused's authority

118. In 1992, as UNPROFOR was arriving in SBWS to implement the Vance Plan,<sup>493</sup> the Unit took measures to conceal its affiliation with the SerbianDB—a strategy

<sup>481</sup> [REDACTED]; NIELSENChristian:P00850, para.204.

<sup>482</sup> P02710, p.20,22; P02864, p.14; P00261, p.13; P00265, p.9.

<sup>483</sup> P02831, p.8-9,15; P02715, p.10,12,18-19; P00259, p.13[REDACTED]; P00553, p.16-17; P02296, p.19-20; P02850, p.6; P02706, p.6-7; P02709, p.6,8; P00264, p.19-20; P00262, p.10-11; [REDACTED]; P00258, p.2-3; P00500, p.3-4,36; P02839, p.1,4; [REDACTED]; P02849, p.1-2,16; P02851, p.31; P02852, p.6-9.

<sup>484</sup> E.g. P00259, p.14; P00261, p.5; P00260, p.1,4-5; P00265, p.9; P00266, p.8; P00262, p.7,11; [REDACTED]; P00263, p.2; P00264, p.13; P00500, p.3; P02835, p.13.

<sup>485</sup> [REDACTED]. See also e.g. [REDACTED]; P02852, p.13-14; P00845, p.2.

<sup>486</sup> [REDACTED]; P02852, p.6-8,41; [REDACTED].

<sup>487</sup> P02852, p.6-8,13-14,38-39,41. See also NIELSENChristian:T.23-24(15-Nov-2017).

<sup>488</sup> [REDACTED]; P00260, p.15-16. See also KRSMANOVIĆDragoslav:T.2-5,44-45(1-Oct-2019).

<sup>489</sup> Cross-reference Section II.F.2(f)(ii); Section II.F.3(d). See [REDACTED].

<sup>490</sup> [REDACTED]; P00260, p.23-24,31.

<sup>491</sup> Cross-reference Section II.D.1(b); Section II.F.3(b).

<sup>492</sup> E.g. [REDACTED]; P00164, p.3,5-6; WILSONJohn:T.60(27-Jun-2017); [REDACTED]. Cross-reference Section II.D.2(b)(i); Section II.E.4(d).

<sup>493</sup> Cross-reference Section II.F.3(c).

**SIMATOVIĆ** acknowledged years later at the KOSTIĆ Centre ceremony.<sup>494</sup> Unit members received RSK-MUP identification cards [REDACTED].<sup>495</sup> As a result, Unit members from across Serbia, BiH and Montenegro, with no apparent connection to Croatia or RSK, held official RSK-MUP identification cards (many holding both RSK-MUP and SMUP cards simultaneously).<sup>496</sup>

119. The then-Unit commander in Pajzoš, Ilija VUČKOVIĆ<sub>(DB)</sub>, held himself out to UNPROFOR as commander of the RSK-MUP “special police”.<sup>497</sup> The Unit’s records at Pajzoš reflected an abrupt change in nomenclature beginning in June 1992: handwritten applications and other documents began referring to the Unit as JPN of the RSK-MUP.<sup>498</sup> This ruse to conceal the SerbianDB link to the Unit was consistent with the widespread re-packaging of JNA personnel and equipment as RSK-MUP to evade the Vance Plan.<sup>499</sup> Reading the Unit’s records in their totality, however, it is clear that this was the same Unit, comprising the same individuals operating under the Accused. For example:

- On 27 June 1992, IVANOVIĆ<sub>(DB)</sub> signed one document as commander of the SMUP “Unit for Special Purposes”,<sup>500</sup> and signed another document as “Krajina MUP Special Purpose Unit” commander.<sup>501</sup>
- Ilija VUČKOVIĆ<sub>(DB)</sub> signed documents as SMUP “Special Purpose Unit” commander at Ležimir in February 1992,<sup>502</sup> then as RSK-MUP “Special Purpose Unit” commander in Ilok in June and September 1992.<sup>503</sup> In the June 1992 document, VUČKOVIĆ<sub>(DB)</sub> appointed Jovan KUJUNDŽIĆ<sub>(DB)</sub> commander of the

<sup>494</sup> [P00256](#), p.9(00:13:06-00:13:38). See NIELSENChristian:T.16-17(15-Nov-2017).

<sup>495</sup> [REDACTED]; [P00553](#), p.30-31; [REDACTED]. See also THEUNENSReynaud:T.7(22-Mar-2018).

<sup>496</sup> NIELSENChristian:[P00850](#), para.195,fn.336. See e.g. [P00553](#), p.1,30-31; [REDACTED]; [P02821](#), p.7; [P02851](#), p.29; [REDACTED]; [2D00222](#), p.1; [REDACTED]; [P02717](#), p.31; [P02841](#), p.2; [P02838](#), p.1; [P02707](#), p.4; [P02712](#), p.17; [REDACTED]; [P00285](#), p.2; [P00287](#); [REDACTED].

<sup>497</sup> [1D00004](#), p.4. See WILSONJohn:T.56-57(4-Jul-2017).

<sup>498</sup> E.g. [P03238](#); [REDACTED].

<sup>499</sup> Cross-reference Section [II.F.3\(c\)](#).

<sup>500</sup> [P02725](#), p.4(p.14(BCS)). See [P00260](#), p.29-30,33; THEUNENSReynaud:T.61(14-Mar-2018).

<sup>501</sup> [2D00123](#), p.3(ENG)(BCS). See KRSMANOVIĆDragoslav:T.44-45(2-Oct-2019). See also THEUNENSReynaud:T.7(22-Mar-2018).

<sup>502</sup> [P00259](#), p.15; [P00258](#), p.29-30.

<sup>503</sup> [P02715](#), p.15-16; [P02702](#), p.8.

Pajzoš IKM of the RSK-MUP JPN,<sup>504</sup> while KUJUNDŽIĆ's<sub>(DB)</sub> personnel file reveals that he was using a SMUP car in June 1992.<sup>505</sup>

120. The documents that IVANOVIĆ<sub>(DB)</sub> and VUČKOVIĆ<sub>(DB)</sub> signed in June 1992—one as a SMUP unit, the others as a RSK-MUP unit—all bear the same JPN stamp.<sup>506</sup> This is the same JPN stamp **SIMATOVIĆ** used in 1993.<sup>507</sup>

121. Certificates that **STANIŠIĆ**'s witness, Dragoslav KRSMANOVIĆ<sub>(DB)</sub>,<sup>508</sup> issued based on information from the SerbianDB's administrative department<sup>509</sup> provide additional confirmation:

- VUČKOVIĆ<sub>(DB)</sub>'s certificate indicates that he was a member of the same Unit from 5 May 1991 until 1 November 1992, which other SerbianDB records corroborate.<sup>510</sup>
- IVANOVIĆ<sub>(DB)</sub>'s certificate, issued in October 1997, indicates that he was a member of the same Unit since 1 June 1991.<sup>511</sup>

122. During summer 1992, after the Unit adopted the RSK-MUP JPN nomenclature, [REDACTED],<sup>512</sup> while VUČKOVIĆ<sub>(DB)</sub> and other Unit members operated the camp.<sup>513</sup> After the Unit's Posavina Corridor operations Unit members returned to Pajzoš where

<sup>504</sup> [P02715](#), p.15-16.

<sup>505</sup> [P02715](#), p.14. See also [P03066](#). On 2 June 1992, Ilija VUČKOVIĆ<sub>(DB)</sub> signed as RSK-MUP "Special Purpose Unit" Commander in Ilok a list of persons issued with RSK IDs, including Zoran RISTOVIĆ whose SerbianDB personnel file demonstrates that he was a Unit member from 1992. See [P00830](#), p.8.

<sup>506</sup> Compare [P02715](#), p.11(BCS), [P02725](#), p.14(BCS), and [2D00123](#), p.3(BCS).

<sup>507</sup> [1D00102](#), p.3-4(BCS); AnnexF, p.5-6.

<sup>508</sup> The Chamber should only credit KRSMANOVIĆ<sub>(DB)</sub>'s testimony on points that are admissions against his own interest or the interest of the Accused, and on technical and structural matters about which his evidence is corroborated by contemporaneous records. KRSMANOVIĆ<sub>(DB)</sub>'s ICTY Trial evidence regarding [2D00143](#) (a SerbianDB report he authored in February 1994) is entirely incompatible with his testimony during this trial: compare [REDACTED] with KRSMANOVIĆDragoslav:T.8-9(24-Sep-2019); [REDACTED]. The Chamber must, therefore, consider KRSMANOVIĆ<sub>(DB)</sub>'s abrupt departure from his prior evidence with caution, and give more weight to [2D00143](#) as the contemporaneous and reliable version of events: see KRSMANOVIĆDragoslav:T.47-48(1-Oct-2019). Moreover, KRSMANOVIĆ<sub>(DB)</sub> has a history of lying under oath, and was convicted for perjury in the trial of fellow Unit members for the assassination of Prime Minister Zoran ĐINĐIĆ: [P03785](#), p.1-2; KRSMANOVIĆDragoslav:T.16-17(1-Oct-2019); [1D00405](#), p.7-8.

<sup>509</sup> [P00259](#), p.14; KRSMANOVIĆDragoslav:T.57-58(1-Oct-2019). See also KRSMANOVIĆDragoslav:T.2-5(1-Oct-2019); THEUNENSReynaud:T.9-11(14-Mar-2018).

<sup>510</sup> In February 1994, KRSMANOVIĆ<sub>(DB)</sub> reported that VUČKOVIĆ<sub>(DB)</sub> was the head of the SMUP Unit in Pajzoš after the opening of the Posavina Corridor in 1992: [2D00143](#), p.2. See [REDACTED] KRSMANOVIĆDragoslav:T.52(1-Oct-2019). [REDACTED].

<sup>511</sup> [P00263](#), p.2; KRSMANOVIĆDragoslav:T.45(2-Oct-2019).

<sup>512</sup> [REDACTED].

<sup>513</sup> [P03238](#).

they “remained to guard the [*sic*] Pajzoš and the *Bela Kuća* /White House/” (a facility the Unit used in Ilok town),<sup>514</sup> according to a report KRSMANOVIĆ<sub>(DB)</sub> prepared with KOSTIĆ<sub>(DB)</sub> at STANIŠIĆ’s request.<sup>515</sup> [REDACTED].<sup>516</sup> [REDACTED].<sup>517</sup>

(iii) The Accused directed the Unit during their Posavina Corridor operations, furthering the CCP

123. From April 1992, the Accused delegated operational command to trusted Unit members to lead significant takeover operations along the Posavina Corridor, including in Bosanski Šamac, Brčko, Doboj, and Teslić to expel non-Serbs.<sup>518</sup> During this period, the Accused sent orders from and accommodated Unit members at the Unit’s command centre in Belgrade, in a temporary facility next to the SMUP.<sup>519</sup> SIMATOVIĆ confirmed the Unit’s participation in the Posavina Corridor operations at the KOSTIĆ Centre ceremony.<sup>520</sup>

a. Bosanski Šamac

124. The Accused exercised authority over the Unit and were responsible for its actions in Bosanski Šamac. In March 1992, SIMATOVIĆ personally deployed a mixed group of Unit members and Bosanski Šamac locals who had just undergone training at Pajzoš to take over Bosanski Šamac, commanded by Unit member Dragan ĐORĐEVIĆ aka CRNI<sub>(DB)</sub>.<sup>521</sup> [REDACTED],<sup>522</sup> SIMATOVIĆ briefed this group at Pajzoš on their upcoming assignment.<sup>523</sup> [REDACTED], and the chain of command went up through CRNI<sub>(DB)</sub> to SIMATOVIĆ.<sup>524</sup> The chain of command remained intact notwithstanding their operational resubordination to the JNA and VRS.<sup>525</sup> In Bosanski Šamac, CRNI<sub>(DB)</sub>’s

<sup>514</sup> [2D00143](#), p.2; [REDACTED]. See also THEUNENSReynaud:T.9-11(14-Mar-2018); [1D00004](#), p.4.

<sup>515</sup> [2D00143](#); KRSMANOVIĆDragoslav:T.46-48(1-Oct-2019).

<sup>516</sup> [REDACTED].

<sup>517</sup> [REDACTED].

<sup>518</sup> Cross-reference Section [II.F.4\(b\)\(ii\)](#).

<sup>519</sup> [REDACTED].

<sup>520</sup> [P00256](#), p.11.

<sup>521</sup> Cross-reference Section [II.E.4\(b\)\(iii\)](#); Section [II.F.4\(b\)\(ii\)a](#). Unit members participating in the Bosanski Šamac operations included: [REDACTED], Saša ĆULIBRK<sub>(DB)</sub>, Goran KORF<sub>(DB)</sub>, Predrag LAZAREVIĆ<sub>(DB)</sub>, Slobodan MILJKOVIĆ aka LUGAR<sub>(DB)</sub>, [REDACTED], Srećko RADOVANOVIĆ aka DEBELI<sub>(DB)</sub>, [REDACTED], [REDACTED], and Aleksandar VUKOVIĆ<sub>(DB)</sub>.

<sup>522</sup> [REDACTED]. See [P02942](#); [REDACTED]; [P00254](#); [REDACTED]; [P00780](#); [REDACTED]; [P02552](#).

<sup>523</sup> [REDACTED].

<sup>524</sup> [REDACTED].

<sup>525</sup> [REDACTED] [REDACTED]; [P02048](#); [REDACTED]. Cross-reference Section [II.F.4\(b\)\(ii\)a.iv](#).

group was known as Grey Wolves or Red Berets.<sup>526</sup> **SIMATOVIĆ** met with CRNI<sub>(DB)</sub> in Belgrade after the takeover, instructing him to write a report on the events in Bosanski Šamac,<sup>527</sup> underscoring **SIMATOVIĆ**'s uninterrupted authority.

125. [REDACTED],<sup>528</sup> [REDACTED].<sup>529</sup> [REDACTED]<sup>530</sup>—[REDACTED].<sup>531</sup> [REDACTED].<sup>532</sup>

126. The Accused's subsequent engagement with CRNI<sub>(DB)</sub> further underscores their authority. When CRNI<sub>(DB)</sub> was arrested, he insisted that **SIMATOVIĆ** be informed, and **STANIŠIĆ** secured his release—warning that CRNI<sub>(DB)</sub>'s arrest was “really touch[ing] a hornets' nest”.<sup>533</sup> CRNI<sub>(DB)</sub> left Bosanski Šamac upon release, only to return with his unit shortly thereafter when local Serb authorities asked Milan PRODANIĆ<sub>(DB)</sub> (the SerbianDB 8<sup>th</sup> Administration Chief, responsible for the SerbianDB's personnel issues<sup>534</sup>) and **SIMATOVIĆ**'s deputy FILIPOVIĆ<sub>(DB)</sub> to send him back for further operations.<sup>535</sup> In November 1992 **STANIŠIĆ** personally discussed with the VRS whether CRNI<sub>(DB)</sub> would be allowed to continue operating in the Bosanski Šamac area.<sup>536</sup>

b. Brčko

127. In June 1992, following the Bosanski Šamac operation, CRNI<sub>(DB)</sub>'s group continued along the Posavina Corridor to Brčko, merging with a Unit contingent under IVANOVIĆ<sub>(DB)</sub>'s command and **SIMATOVIĆ**'s direct authority,<sup>537</sup> [REDACTED].<sup>538</sup> During this time, MIJOVIĆ<sub>(DB)</sub> frequently travelled from Belgrade to bring weapons, ammunition, and fuel for the Unit.<sup>539</sup> [REDACTED].<sup>540</sup>

<sup>526</sup> [REDACTED].

<sup>527</sup> [REDACTED].

<sup>528</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>529</sup> Section [II.F.4\(b\)\(ii\)a.iv](#).

<sup>530</sup> Indictment, para.50. *Cross-reference* Section [III.C.3\(c\)](#).

<sup>531</sup> [REDACTED].

<sup>532</sup> [REDACTED].

<sup>533</sup> [REDACTED]; [P00846](#), p.3.

<sup>534</sup> [P02983](#), p.2.

<sup>535</sup> [REDACTED]; [P01953](#), p.2-3; [P01988](#); [P01989](#); [P01919](#), p.2; [P03612](#), p.3; [P03142](#), p.1; [REDACTED].

<sup>536</sup> [P01988](#); [P01989](#); THEUNENSReynaud:T.92-93(22-Mar-2018). *See also* [REDACTED].

<sup>537</sup> [REDACTED]; [P02045](#), p.3. *Cross-reference* Section [II.F.4\(b\)\(ii\)b](#). Unit members who participated in operations in Brčko included: Božo and Rade BOŽIĆ<sub>(DB)</sub>, Dragan ĐORĐEVIĆ aka CRNI<sub>(DB)</sub>, Živojin IVANOVIĆ<sub>(DB)</sub>, Vaso MIJOVIĆ<sub>(DB)</sub>, [REDACTED], and [REDACTED].

<sup>538</sup> [REDACTED]; [P00811](#), p.2.

<sup>539</sup> [REDACTED].

128. Thanks to the Accused, [REDACTED].<sup>541</sup> When arrested in Brčko, IVANOVIĆ<sub>(DB)</sub> asserted that **SIMATOVIĆ** and **STANIŠIĆ**'s Deputy TEPAVČEVIĆ<sub>(DB)</sub> had sent him to Brčko.<sup>542</sup> [REDACTED].<sup>543</sup>

c. Doboj

129. BOŽOVIĆ<sub>(DB)</sub> reported directly to the Accused during his deployment to Doboj<sup>544</sup> in April 1992, as he established and oversaw the SerbianDB's Ozren and Vila training camps, and led the Unit in horrific crimes to remove non-Serbs.<sup>545</sup> The Unit and the forces they trained wore red berets [REDACTED], [REDACTED] with the Unit's wolf patch,<sup>546</sup> and became known in Doboj as the Red Berets.<sup>547</sup>

130. During the Doboj operations, BOŽOVIĆ<sub>(DB)</sub>'s group was paid through the CSB Doboj as a "Special Group",<sup>548</sup> [REDACTED].<sup>549</sup> Though this shows coordination between the Accused and RS-MUP, the group remained under BOŽOVIĆ<sub>(DB)</sub>'s command, subordinate to the Accused,<sup>550</sup> [REDACTED].<sup>551</sup> KDF applications indicate that Ozren trainees joined the "MUP Serbia" "Red Berets" under the command of BOŽOVIĆ<sub>(DB)</sub> and "Frenki".<sup>552</sup> The SerbianDB personnel files of [REDACTED] men listed on the CSB Doboj paylists further corroborate their affiliation with the SerbianDB during their Doboj deployment.<sup>553</sup> [REDACTED].<sup>554</sup>

<sup>540</sup> [REDACTED].

<sup>541</sup> [REDACTED]; [2D00089](#), p.1-2,5,10; STOPARIĆ Goran:T.20-22,24(30-Nov-2017).

<sup>542</sup> [1D00067](#), p.10.

<sup>543</sup> [REDACTED].

<sup>544</sup> [REDACTED].

<sup>545</sup> *Cross-reference* Section [II.E.4\(c\)\(ii\)](#); Section [II.F.4\(b\)\(ii\)c](#). Unit members who participated in the Doboj operations included: Đurica BANJAC<sub>(DB)</sub>, Raja BOŽOVIĆ<sub>(DB)</sub>, Milan DIMIĆ<sub>(DB)</sub>, Nedeljko DRAČA<sub>(DB)</sub>, Njegoslav KUŠIĆ<sub>(DB)</sub>, Nikola LONČAR<sub>(DB)</sub>, [REDACTED], Davor SUBOTIĆ<sub>(DB)</sub>, and Fnu VUKMIROVIĆ aka VUK<sub>(DB)</sub>. *Cross-reference* AnnexA. *See also e.g.* [P00500](#), p.16; [P01171](#); [P02851](#).

<sup>546</sup> RFJ-165:T.13-14(29-May-2018); [REDACTED]; [P00780](#).

<sup>547</sup> [REDACTED].

<sup>548</sup> [P01171](#); [P01173](#); [P01172](#).

<sup>549</sup> [REDACTED].

<sup>550</sup> [REDACTED]. *See also* [REDACTED]; [P02374](#), p.3-4.

<sup>551</sup> [REDACTED].

<sup>552</sup> [P01168](#), p.3; [P01167](#), p.3,5; [P01169](#), p.5; [P01170](#), p.2; [P02387](#), p.5.

<sup>553</sup> [REDACTED]; [REDACTED]; [P00553](#); [P02706](#); [REDACTED]; [P00500](#); [P02851](#).

<sup>554</sup> [REDACTED].



(iv) The Accused directed Unit members to train Serb Forces for the joint Podrinje operations, during which SIMATOVIĆ commanded the Unit

131. The Accused deployed BOŽOVIĆ<sub>(DB)</sub> and MIJOVIĆ<sub>(DB)</sub> to run SerbianDB camps at Skelani, Tara, and Bratunac, training forces known as Red Berets or [REDACTED], whom SIMATOVIĆ, BOŽOVIĆ<sub>(DB)</sub> and MIJOVIĆ<sub>(DB)</sub> then commanded in joint scorched-earth operations with the VJ and VRS.<sup>555</sup> SIMATOVIĆ met with Serb leaders of the Podrinje municipalities about the camps in mid-1992, making clear that they would function through a “separate structure under his command,” with commanders SIMATOVIĆ provided.<sup>556</sup>

a. Tara, Skelani, and Bratunac

132. The Accused established the Unit’s command for the central Podrinje area at Mt. Tara, and SIMATOVIĆ was a frequent presence there.<sup>557</sup> From January 1993, SIMATOVIĆ sent BOŽOVIĆ<sub>(DB)</sub> and other Unit members to be instructors at Tara, where they were known as “Frenki’s men”<sup>558</sup> and trained Serb Forces to deploy into the Bosnian Podrinje.<sup>559</sup>

133. The Skelani Red Berets went to the Tara camp in January 1993 and returned to Skelani in February with BOŽOVIĆ<sub>(DB)</sub> as their commander.<sup>560</sup> The Unit had organised the Skelani Red Berets at their Skelani camp beginning in June 1992, following SIMATOVIĆ’s meeting with the Podrinje Serb leadership.<sup>561</sup> SIMATOVIĆ commanded and financed BOŽOVIĆ’s Skelani Red Berets,<sup>562</sup> and controlled the bridge between Skelani and Bajina Bašta, policing who and what could cross the border to and

<sup>555</sup> Cross-reference Section II.E.4(d)(ii)-(iv); Section II.F.5(b)(i).

<sup>556</sup> DERONJIĆMiroslav:P01717, para.134-137.

<sup>557</sup> DERONJIĆMiroslav:P01717, para.150; [REDACTED]; STEVANOVIĆObrad:P03853; P02267(00:01:19-00:01:28)(00:01:44-00:01:49)(00:01:57-00:02:46); STEVANOVIĆObrad:T.59-61,64(22-Sep-2020); P01943, p.137.

<sup>558</sup> GREKULOVIĆSrđan:T.28,31(8-Oct-2019); GREKULOVIĆSrđan:T.37-38(9-Oct-2019); [REDACTED]; P02834, p.44.

<sup>559</sup> STEVANOVIĆObrad:T.45(30-Sep-2020); [REDACTED]; GREKULOVIĆSrđan:T.28,31(8-Oct-2019); GREKULOVIĆSrđan:T.37-38(9-Oct-2019); NOVAKOVIĆRadenko:T.36-37(18-Sep-2019). Cross-reference Section II.E.4(d)(iv).

<sup>560</sup> P01942, p.2.

<sup>561</sup> Cross-reference Section II.E.4(d)(ii)-(iv).

<sup>562</sup> P03621, p.2; P01946, p.1-2; THEUNENSReynaud:P01980, p.527-528. See also P03615, p.2; 1D00070, p.2; P01942, p.2.



from Serbia.<sup>563</sup> The SerbianDB personnel files of the Skelani Red Berets listed in [P01942](#) show their affiliation with the SerbianDB.<sup>564</sup> [REDACTED].<sup>565</sup>

134. In early 1993, the Accused also sent SerbianDB instructors under MIJOVIĆ<sub>(DB)</sub> to Bratunac to establish a SerbianDB camp and organise local Serbs as the Bratunac Red Berets.<sup>566</sup> [REDACTED].<sup>567</sup> Under MIJOVIĆ<sub>(DB)</sub>, the Unit established its dominance over local police and municipal leadership.<sup>568</sup> Consistent with SIMATOVIĆ's wishes,<sup>569</sup> MIJOVIĆ<sub>(DB)</sub> was not subject to the military command: he "had so much power that he could do what he wanted".<sup>570</sup>

135. To conceal the SerbianDB's involvement,<sup>571</sup> MIJOVIĆ<sub>(DB)</sub> signed his orders to the Bratunac Red Berets as Commander of the RS Special Unit.<sup>572</sup> Nevertheless, SerbianDB documentation shows MIJOVIĆ<sub>(DB)</sub> and the Bratunac Red Berets remained under the Accused's authority.<sup>573</sup> MLADIĆ, the Drina Corps Command, and the Bratunac Brigade referred to MIJOVIĆ<sub>(DB)</sub>'s Unit as a SMUP unit.<sup>574</sup> Moreover, after MIJOVIĆ<sub>(DB)</sub> and the other Unit members left the Bratunac area,<sup>575</sup> Milenko PRODANOVIĆ aka MUNGOS<sub>(DB)</sub><sup>576</sup> and others who had been Bratunac Red Berets formed the "Mungosi" unit,<sup>577</sup> [REDACTED].<sup>578</sup>

<sup>563</sup> [P01942](#), p.2; [P02274](#), p.1; RFJ-083:T.38-39(8-May-2018); [P01946](#), p.1-2; [1D00069](#). See also PLAHUTADejan:T.47(19-Nov-2019).

<sup>564</sup> [P01942](#), p.3-5; [P02845](#); [P02822](#); [P02824](#); [P02836](#); [P02819](#); [P02823](#); [P02827](#); [P02832](#); [P02844](#); [P02853](#); [P02711](#), p.3-4,6,8,12,21; [P02273](#), p.1,3-4,10,17,19.

<sup>565</sup> [P02711](#); [P02273](#); [P02819](#); [P02822](#); [P02824](#); [P02827](#); [P02832](#); [P02844](#); [P02845](#); [P02853](#). [REDACTED].

<sup>566</sup> Cross-reference Section [II.E.4\(d\)\(iii\)](#).

<sup>567</sup> [REDACTED].

<sup>568</sup> DERONJIĆMiroslav:[P01717](#), para.146,150; [REDACTED]; [P03508](#).

<sup>569</sup> DERONJIĆMiroslav:[P01717](#), para.137.

<sup>570</sup> DERONJIĆMiroslav:[P01717](#), para.150.

<sup>571</sup> [P00256](#)(00:13:06-00:13:38), p.9; NIELSENChristian:T.16-17(15-Nov-2017).

<sup>572</sup> E.g. [P03242](#).

<sup>573</sup> [P03243](#); [REDACTED]; [P01941](#), p.3; [P02852](#), p.1-2. See also [REDACTED].

<sup>574</sup> [P01939](#); [1D00070](#), p.1-2; [1D00878](#), p.1; [P01940](#); [P03243](#).

<sup>575</sup> [P01941](#), p.3; [P03508](#), p.1; [P02834](#), p.43.

<sup>576</sup> [P03242](#).

<sup>577</sup> [P03508](#), p.1.

<sup>578</sup> [REDACTED].

b. Podrinje operations<sup>579</sup>

136. In March 1993, under **SIMATOVIĆ**'s overall command,<sup>580</sup> **BOŽOVIĆ**<sub>(DB)</sub> led the Unit, SerbianJB-PJM units, and other SerbianDB-trained forces in Operation Udar.<sup>581</sup> Reflecting the Unit's superiority, the Unit had more authority than the SerbianJB-PJMs,<sup>582</sup> who were subordinated to **BOŽOVIĆ**<sub>(DB)</sub> and the Unit he commanded.<sup>583</sup> [REDACTED].<sup>584</sup>

137. [REDACTED].<sup>585</sup> [REDACTED]<sup>586</sup> [REDACTED].<sup>587</sup>

138. Under **MIJOVIĆ**<sub>(DB)</sub>, the Bratunac Red Berets participated in operations in the Bratunac area as part of the persecutory campaign.<sup>588</sup>

139. [REDACTED].<sup>589</sup>

(v) The Accused directed the Unit in assignments advancing the CCP in 1994-1995, demonstrating their continuing authority and the Unit's continuity

140. The Accused's authority over the Unit never wavered as they deployed Unit members in successive joint operations with the SDG and/or Scorpions in BiH and Croatia in 1994-1995.<sup>590</sup> The Accused's authority over these SerbianDB units in the Pauk,<sup>591</sup> Trnovo/Treskavica,<sup>592</sup> and ARK<sup>593</sup> operations is addressed elsewhere in this Brief.<sup>594</sup>

<sup>579</sup> Unit members who participated in the Podrinje operations included: Raja **BOŽOVIĆ**<sub>(DB)</sub>, Zvezdan **JOVANOVIĆ**<sub>(DB)</sub>, Ranko **LAČEVIĆ**<sub>(DB)</sub>, [REDACTED], Vaso **MIJOVIĆ**<sub>(DB)</sub>, Ljubomir **OBRADOVIĆ**<sub>(DB)</sub>, Nikola **PILIPOVIĆ**<sub>(DB)</sub>, Žarko **TEOFANOVIĆ**<sub>(DB)</sub>, and Budimir **ZEČEVIĆ**<sub>(DB)</sub>. *See also e.g.* [P02852](#), p.1-2; [P02873](#), p.1.

<sup>580</sup> [REDACTED]; RFJ-083:T.60-61(10-May-2018); RFJ-083:T.37-38(8-May-2018).

<sup>581</sup> *Cross-reference* Section [II.E.4\(d\)\(ii\)](#),(iv); Section [II.F.5\(b\)\(i\)](#).

<sup>582</sup> [REDACTED]; RFJ-083:T.60-61(10-May-2018); RFJ-083:T.20-21(8-May-2018).

<sup>583</sup> [REDACTED]; RFJ-083:T.25(9-May-2018); RFJ-083:T.44-46,59-60(10-May-2018). *See also* **STEVANOVIĆ**Obiad:T.10(23-Sep-2020); **STEVANOVIĆ**Obiad:T.48(24-Sep-2020).

<sup>584</sup> [REDACTED].

<sup>585</sup> [REDACTED].

<sup>586</sup> [REDACTED].

<sup>587</sup> [REDACTED].

<sup>588</sup> **DERONJIĆ**Miroslav:[P01717](#), para.147-148; [P01941](#), p.3; [P02852](#), p.1-2; [P01940](#).

<sup>589</sup> [REDACTED].

<sup>590</sup> *Cross-reference* Section [II.D.2\(b\)\(v\)](#); Section [II.F.5\(b\)\(ii\)](#)-(v).

<sup>591</sup> Unit members included in Pauk included: Raja **BOŽOVIĆ**<sub>(DB)</sub>, Dragan **FILIPOVIĆ**<sub>(DB)</sub>, Zvezdan **JOVANOVIĆ**<sub>(DB)</sub>, Dragoslav **KRSMANOVIĆ**<sub>(DB)</sub>, [REDACTED], [REDACTED], Dušan **MOMČILOVIĆ**<sub>(DB)</sub>, Zoran **RAIĆ**<sub>(DB)</sub>, Dejan **SLIŠKOVIĆ**<sub>(DB)</sub>, and [REDACTED]. *Cross-reference* AnnexA.

<sup>592</sup> Unit members Vaso **MIJOVIĆ**<sub>(DB)</sub> led the Trnovo/Treskavica operation. *Cross-reference* AnnexA.

141. In 1995, the Accused reinforced the Unit's presence throughout RSK to maintain control over territory they had cleansed of non-Serbs:

- [REDACTED],<sup>595</sup> [REDACTED],<sup>596</sup> exemplifying the Unit's continuing relationship with the Red Berets units it founded.<sup>597</sup>
- In Knin, at the Unit's new Sova camp,<sup>598</sup> the Accused formed the *Poskok* Detachment in June.<sup>599</sup> The early members of the *Poskok* Detachment were veterans of the CIGO unit,<sup>600</sup> led by veteran Unit member Nikola SIMIĆ aka CIGO<sub>(DB)</sub><sup>601</sup> and comprised of alumni of Golubić<sup>602</sup> and Captain DRAGAN<sub>(DB)</sub>'s Alfa training camp.<sup>603</sup> Members of the *Poskok* Detachment wore the Unit's signature red beret, with a *Poskok* insignia.<sup>604</sup>
- In Western Srem, throughout 1995, the Unit trained recruits in increasing numbers at Pajzoš,<sup>605</sup> and the Accused were regularly on the premises.<sup>606</sup> [REDACTED].<sup>607</sup> The *Poskok* Detachment left Knin after the Croatian offensive Operation Storm in August 1995 and re-grouped in Serb-held Ilok,<sup>608</sup> where veteran Unit member RAIC<sub>(DB)</sub><sup>609</sup> commanded the Pajzoš camp and expanded the Unit's ranks with other Knin Krajina veterans.<sup>610</sup> [REDACTED].<sup>611</sup>

<sup>593</sup> Unit members involved in the ARK operations included: Raja BOŽOVIĆ<sub>(DB)</sub> and Dragan FILIPOVIĆ<sub>(DB)</sub>. Cross-reference AnnexA.

<sup>594</sup> Cross-reference Section II.E.5(b)(v).

<sup>595</sup> [REDACTED]; RFJ-151:T.56(19-Sep-2017); [P00553](#), p.13-14,18(SIMATOVIĆ is referred to as "F" in the MUP Belgrade. The name of his secretary was Slada),23; [REDACTED]; [P00545](#), p.2,4-5; [2D00034](#); [P00552](#); [P00544](#), p.1-2.

<sup>596</sup> [REDACTED]; RFJ-151:T.56(19-Sep-2017); [P00536](#), p.2-3. See also [P00553](#), p.13.

<sup>597</sup> AnnexA; [REDACTED]. [REDACTED]. See [P03508](#), p.1.

<sup>598</sup> Cross-reference Section II.E.4(c)(ii). See [P00852](#), p.7.

<sup>599</sup> [P02713](#), p.1,6; [P02865](#), p.1-2,7-8; [P02870](#), p.1,4,23; [P01972](#), p.1.

<sup>600</sup> [P02713](#), p.6-9; [P02865](#), p.1-2; [P02870](#), p.4.

<sup>601</sup> [P02871](#), p.5,18-19.

<sup>602</sup> [P02713](#), p.1,4,6-9.

<sup>603</sup> [P02865](#), p.1-2; [P02870](#), p.1,3-4; [REDACTED].

<sup>604</sup> [P01972](#), p.6; [P02867](#), p.13; [P02868](#), p.17; [P02870](#), p.20; [P02713](#), p.5.

<sup>605</sup> Cross-reference Section II.E.4(b)(iii).

<sup>606</sup> [REDACTED]; KRSMANOVIĆDragoslav:T.15(1-Oct-2019); KRSMANOVIĆDragoslav:T.15(3-Oct-2019); STEVANOVIĆObrad:T.35(23-Sep-2020); STEVANOVIĆObrad:T.41(1-Oct-2020); PLAHUTADejan:T.65-66(19-Nov-2019); [REDACTED]; [P00817](#), p.2-3.

<sup>607</sup> [REDACTED].

<sup>608</sup> [P02871](#), p.18-19,20-25; [P02865](#), p.1-3,7; [P02870](#), p.3,23.

<sup>609</sup> [REDACTED].

<sup>610</sup> [P01972](#), p.1-4,6-11; [P02867](#), p.4-5,7-8,13-14; [P02868](#), p.2-5,17,21.

<sup>611</sup> [REDACTED]; RFJ-150:T.28(22-May-2018); RFJ-150:T.16(23-May-2018).

142. In September 1995, in their final deployment in SBWS following Operation Storm, FILIPOVIĆ<sub>(DB)</sub> and BOŽOVIĆ<sub>(DB)</sub> coordinated the three SerbianDB special units with other Serb Forces.<sup>612</sup> Just as they had done when originally seizing SBWS territory in 1991, the Accused covered all SBWS regions with their forces<sup>613</sup>: MIJOVIĆ<sub>(DB)</sub><sup>614</sup> and Zvezdan JOVANOVIĆ<sub>(DB)</sub> commanded contingents of the Unit in Baranja and Western Srem, respectively, LEGIJA<sub>(DB)</sub> covered Eastern Slavonia, [REDACTED].<sup>615</sup> License plates MIJOVIĆ<sub>(DB)</sub>'s Unit in Bilje took from Croat forces as trophies were later on display at the JSO's KOSTIĆ<sub>(DB)</sub> Centre, demonstrating that this was one and the same Unit.<sup>616</sup> The JATD paylists reflect the Unit under BOŽOVIĆ<sub>(DB)</sub>, MIJOVIĆ<sub>(DB)</sub> and JOVANOVIĆ<sub>(DB)</sub>,<sup>617</sup> including the *Poskoks*<sup>618</sup> [REDACTED],<sup>619</sup> being paid by the SerbianDB during these operations in 1995.

(vi) The formalisation of the Unit as the JATD demonstrates the Accused's continuing authority

143. In August 1993, the Accused formalised the Unit as the JATD. This was the same Unit that had operated under the Accused since May 1991. Although the name and certain aspects of the JATD's organisational structure changed, its personnel were the same, as was the goal to pursue the CCP. As Captain DRAGAN<sub>(DB)</sub> later remarked, "[m]any things changed in the Unit during those years, but its essence, as the DB's secret armed formation—that never would".<sup>620</sup>

a. Formalisation and command structure

144. The JATD was formalised in secret. Although SOKOLOVIĆ's 1 August 1993 order establishing the SerbianDB's Public Security counterpart, the PJM (under BADŽA)

<sup>612</sup> [P00817](#), p.6; [P00842](#), p.3. See [REDACTED].

<sup>613</sup> Cross-reference Section [II.F.5\(b\)](#).

<sup>614</sup> [P03273](#), p.2; [P00553](#), p.13-14; [P00536](#).

<sup>615</sup> [P00842](#), p.1,3; [REDACTED].

<sup>616</sup> [REDACTED]; [P00537](#)(00:00:45); [P00536](#)(01:34:30).

<sup>617</sup> See AnnexE.1. See also [REDACTED].

<sup>618</sup> See AnnexA biographies of Nikola SIMIĆ<sub>(DB)</sub>, Goran OPAČIĆ<sub>(DB)</sub>, Nenad ŠARE<sub>(DB)</sub>, and AnnexE.1 for an overview of the JATD payments to them. See also AnnexD([P02856](#); [P02860](#); [P02861](#); [P02713](#); [P02865](#); [P02866](#); [P02867](#); [P02868](#); [REDACTED]; [P02361](#); [P00234](#); [P00830](#); [REDACTED]; [1D00629](#)(Personnel Files of *Poskok* Detachment members who appear on SerbianDB paylists).

<sup>619</sup> [REDACTED].

<sup>620</sup> [P00059](#), p.7.

is available,<sup>621</sup> there is no record<sup>622</sup> of the order establishing the JATD (under **STANIŠIĆ**), [REDACTED].<sup>623</sup>

145. While the order is not available, the SerbianDB's contemporaneous documentation shows that **STANIŠIĆ** and **SIMATOVIĆ** formalised the Unit as the Unit for Anti-Terrorist Activities ("JATD") around 4 August 1993.<sup>624</sup> As part of the formalisation process, in August 1993, with **SIMATOVIĆ**'s approval,<sup>625</sup> the SerbianDB requested background checks on many original and continuing Unit members, including [REDACTED].<sup>626</sup>

146. Formalised as the JATD, the Unit remained an independent organisational unit over which the Accused held direct command.<sup>627</sup> **STANIŠIĆ** held ultimate authority over the Unit.<sup>628</sup> While the position of JATD Commander was officially left unfilled, the Unit reported directly to **SIMATOVIĆ**;<sup>629</sup> the Unit understood he was their commander.<sup>630</sup> **RADONJIĆ<sub>(DB)</sub>** was officially designated the JATD Deputy Commander,<sup>631</sup> and **FILIPOVIĆ<sub>(DB)</sub>**,<sup>632</sup> was **SIMATOVIĆ**'s deputy in the 2<sup>nd</sup> Administration.<sup>633</sup>

<sup>621</sup> [2D00159](#); MILOŠEVIĆMilan:T.15-16(27-Feb-2020).

<sup>622</sup> MILOŠEVIĆMilan:T.18(27-Feb-2020).

<sup>623</sup> See [REDACTED].

<sup>624</sup> E.g. [P02567](#), p.1; [P02296](#), p.12. See [REDACTED]. [REDACTED]. See also NIELSENChristian:T.42(14-Nov-2017); NIELSENChristian:[P00850](#), para.203.

<sup>625</sup> [REDACTED]; KRSMANOVIĆDragoslav:[1D00384](#), para.41. See background check requests initiated by **SIMATOVIĆ** at [P02296](#), p.14-16(BCS); [P00859](#), p.26-28(BCS); [REDACTED]; [P02362](#), p.12-13(BCS); NIELSENChristian:T.27-28(15-Nov-2017). Cross-reference AnnexF, p.5-6.

<sup>626</sup> [REDACTED]; [P00265](#), p.10. See NIELSENChristian:[P00850](#), para.204; NIELSENChristian:T.28(16-Nov-2017).

<sup>627</sup> KRSMANOVIĆDragoslav:[1D00384](#), para.26; SLIŠKOVIĆDejan:T.8(18-Jul-2018); [REDACTED]; RFJ-150:T.63-64(23-May-2018).

<sup>628</sup> [REDACTED]; RFJ-150:T.10(22-May-2018); KRSMANOVIĆDragoslav:T.8-9(1-Oct-2019).

<sup>629</sup> KRSMANOVIĆDragoslav:[1D00384](#), para.26; KRSMANOVIĆDragoslav:T.48-49(1-Oct-2019). See also [P00266](#), p.30-31(p.26(BCS))(RADONJIĆ<sub>(DB)</sub> signed and forwarded the report to "NU"; **SIMATOVIĆ** initialled the report next to "NU"); [P02864](#), p.4(ENG)(BCS)(**SIMATOVIĆ** signed the report next to "NU"); [REDACTED]; [P02600](#), p.17-20(p.14(BCS))(**SIMATOVIĆ** initialled RADONJIĆ's report and forwarded it to **STANIŠIĆ** ("NRDB")); [REDACTED]. See AnnexF, p.5-6; MIČIĆRadivoje:T.4(4-Mar-2020).

<sup>630</sup> [REDACTED]; SLIŠKOVIĆDejan:T.8(18-Jul-2018); [REDACTED]; RFJ-150:T.63-64(23-May-2018)

<sup>631</sup> [P02297](#), p.4(personnel decision confirming that RADONJIĆ was assigned to the post described in Article 37 ordinal number 2 of the Decision establishing the JATD); [REDACTED]; NIELSENChristian:T.42-43(14-Nov-2017); KRSMANOVIĆDragoslav:[1D00384](#), para.24; [REDACTED]; PLAHUTADejan:T.23(21-Nov-2019); LUČIĆMiroslav:T.29-30(9-Sep-2020). See also [P02297](#), p.1(p.1(BCS))(The employee evaluation questionnaire of RADONJIĆ<sub>(DB)</sub>—referred to as JATD Deputy Commander—was signed by **SIMATOVIĆ** as "head of the organisational unit"); NILESENChristain:[P00850](#), para.206-207; AnnexF, p.5-6.

<sup>632</sup> [REDACTED](The Deputy Commander was Milan RADONJIĆ<sub>(DB)</sub> and there was also Dragan KRSMANOVIĆ<sub>(DB)</sub>, Zoran RAIĆ<sub>(DB)</sub>, and Major FILIPOVIĆ<sub>(DB)</sub>); SLIŠKOVIĆDejan:T.4(18-Jul-2018).

<sup>633</sup> [REDACTED]; [P03195](#), p.5; [P00860](#); DRAGICEVIĆVlado:T.34(17-Oct-2019). Cross-reference Section [II.B.2](#).

[REDACTED].<sup>634</sup> [REDACTED] and KRSMANOVIĆ<sub>(DB)</sub> were both Assistant Commanders handling logistics.<sup>635</sup> [REDACTED].<sup>636</sup> BOŽOVIĆ<sub>(DB)</sub> also held a commanding position in the JATD, reported directly to the Accused [REDACTED].<sup>637</sup>

147. Once formalised, the Accused continued to sign personnel and payment documents for Unit members.<sup>638</sup> As the Unit's commander, **SIMATOVIĆ** signed JATD Deputy Commander RADONJIĆ<sub>(DB)</sub>'s performance evaluation, as part of an annual process requiring superior officers to evaluate their subordinates' work.<sup>639</sup>

148. As the JATD, Unit members continued to receive red berets, and be called the "Red Berets" or "Frenki's men".<sup>640</sup> Even after being formalised, the JATD's operations remained covert; Serbian law did not permit it to deploy for operations outside Serbia.<sup>641</sup>

b. The Accused distinction between active and reserve forces

149. **STANIŠIĆ** formally recognised Unit members admitted into the "active force" with written employment decisions,<sup>642</sup> and officially assigned them positions in the JATD.<sup>643</sup> The Accused continued to use "reserve" members in key operations furthering the CCP. Overseeing the reserve force was the responsibility of the highest level of the Unit's command—the Accused and RADONJIĆ<sub>(DB)</sub>.<sup>644</sup> The reserve force was less regularised than the active force, giving the Accused broad discretion in determining its composition, based on the subjective "needs of the specific unit".<sup>645</sup> As KRSMANOVIĆ<sub>(DB)</sub> explained, "so long as someone in the DB wanted an individual, that

<sup>634</sup> Cross-reference Section II.E.4(a)(i).

<sup>635</sup> [REDACTED] KRSMANOVIĆDragoslav:T.43(24-Sep-2019); [REDACTED].

<sup>636</sup> [REDACTED].

<sup>637</sup> [REDACTED]; SLIŠKOVIĆDejan:P02541, para.12; SLIŠKOVIĆDejan:T.83-84,88(11-Jul-2018); SLIŠKOVIĆDejan:T.2-4(12-Jul-2018); [REDACTED].

<sup>638</sup> E.g. SLIŠKOVIĆDejan:P02538, para.3; [REDACTED]; P02549, p.1; [REDACTED]; 1D00400; [REDACTED]; P00828, p.1(BCS); P01155, p.1(BCS). See also AnnexD.

<sup>639</sup> P02297, p.1(p.1(BCS))(RADONJIĆ<sub>(DB)</sub>'s employee evaluation questionnaire—referred to as JATD Deputy Commander—was signed by **SIMATOVIĆ** as "head of the organisational unit"); KRSMANOVIĆDragoslav:1D00386, p.8; AnnexF, p.5-6.

<sup>640</sup> [REDACTED]; KRSMANOVIĆDragoslav:1D00384, para.27; [REDACTED]; RFJ-150:T.10(22-May-2018); RFJ-150:T.55(23-May-2018).

<sup>641</sup> MILOŠEVIĆMilan:T.20-21(27-Feb-2020) ; MILOŠEVIĆMilan:T.8-9(26-Feb-2020). See also [REDACTED]; RFJ-150:T.30(22-May-2018).

<sup>642</sup> E.g. P00233, p.32-33(p.24(BCS)); P02590, p.6-7(p.7(BCS)). See also KRSMANOVIĆDragoslav:1D00384, para.44; P00859, p.9-10; P02716, p.21-22; P02818, p.21-22,24-25,28; P02296, p.12; P02297, p.14-15.

<sup>643</sup> [REDACTED].

<sup>644</sup> KRSMANOVIĆDragoslav:T.50(24-Sep-2019); [REDACTED].

<sup>645</sup> KRSMANOVIĆDragoslav:1D00406, p.5-6; KRSMANOVIĆDragoslav:1D00384, para.38.



individual could be appointed to the reserve unit.”<sup>646</sup> Instead of closing loopholes that allowed criminals into the Unit, the system for recruiting to the reserves was specifically designed in a way that bypassed rigorous vetting so criminals could easily be incorporated into the Unit’s ranks.<sup>647</sup>

150. **SIMATOVIĆ**’s most trusted commanders,<sup>648</sup> **IVANOVIĆ**<sub>(DB)</sub>, **BOŽOVIĆ**<sub>(DB)</sub>, and **MIJOVIĆ**<sub>(DB)</sub>, were in the reserve force,<sup>649</sup> received payments from the SerbianDB,<sup>650</sup> and were repeatedly honored at the Unit’s awards ceremonies.<sup>651</sup> [REDACTED].<sup>652</sup>

c. JATD records demonstrate that the JATD was the same Unit that the Accused formed in May 1991

151. As demonstrated by their SerbianDB personnel files, Unit members did not consider themselves to be in a different unit once the JATD was formalised. For instance:

- [REDACTED],<sup>653</sup> thus showing that he considered the Unit he joined in 1991 to be the same as the Unit he was a member of in December 1995.
- [REDACTED].<sup>654</sup> His reference to the same unit dating from May 1991 through December 1993 demonstrates the Unit’s continuity.
- Bogoslav JANJATOVIĆ<sub>(DB)</sub> stated, in a request for transfer to SerbianJB from early 1996, that he had been “formally” employed by the JATD since June 1994, and further stressed that he had, however, “informally”, been a “JATD” member since 1991, and “participated in all combat operations led by the JATD from 1991”.<sup>655</sup>

<sup>646</sup> KRSMANOVIĆDragoslav: [1D00406](#), p.5-6; KRSMANOVIĆDragoslav: [1D00384](#), para.38.

<sup>647</sup> KRSMANOVIĆDragoslav: [1D00406](#), p.5-6; KRSMANOVIĆDragoslav:T.9,12(25-Sep-2019); [P02600](#), p.17-29; KRSMANOVIĆDragoslav:T.35-36(3-Oct-2019).

<sup>648</sup> [REDACTED]; SLIŠKOVIĆDejan: [P02538](#), para.3.

<sup>649</sup> KRSMANOVIĆDragoslav: [1D00384](#), para.42,62; [P00263](#), p.2; KRSMANOVIĆDragoslav:T.45-46(2-Oct-2019); [REDACTED].

<sup>650</sup> AnnexE.1.

<sup>651</sup> [P00849](#), p.5,8-9-11; [P00256](#), p.3-8(00:05:56-00:11:44).

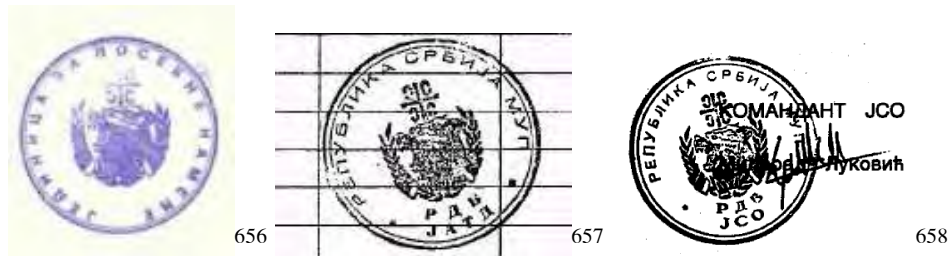
<sup>652</sup> [REDACTED].

<sup>653</sup> [REDACTED].

<sup>654</sup> [REDACTED].

<sup>655</sup> [P02710](#), p.12-13.

152. Further demonstrating the Unit's continuity during the Indictment period, the JPN, JATD—and from 1996, the JSO—seals are identical, but for the change in the name and acronym. Examples of the JPN, JATD and JSO stamps, from left to right, are as follows:



153. Moreover, the Unit used the same JPN stamp on early JATD documents<sup>659</sup> that it had used since 1992, including the period when it called itself the RSK-MUP JPN.<sup>660</sup> **SIMATOVIĆ** initialled background check requests issued in August 1993, after the JATD's establishment, which were stamped with the JPN seal.<sup>661</sup> The same seal appears on [REDACTED] generated after the JATD was formed.<sup>662</sup> This JPN stamp is identical to the stamp on documents that the Unit generated in Ležimir and Pajzoš in 1992.<sup>663</sup>

154. The Unit's ongoing recognition of Unit members who were killed before it was formalised as the JATD is further evidence of the Unit's continuity. The SerbianDB posthumously honoured each of the following deceased Unit members at the Unit's anniversary ceremony on 4 May 1996,<sup>664</sup> and, for many, provided financial support to their relatives:<sup>665</sup>

<sup>656</sup> [P02842](#), p.3(BCS).

<sup>657</sup> [REDACTED].

<sup>658</sup> [P00234](#), p.5(BCS).

<sup>659</sup> E.g. [P00265](#), p.10(BCS); [P00553](#), p.34(BCS); [P02594](#), p.4,6(BCS).

<sup>660</sup> Cross-reference Section [II.D.2\(a\)\(ii\)a](#).

<sup>661</sup> [P02296](#), p.14-16(BCS); [P00859](#), p.26-28(BCS); [REDACTED]; [P02362](#), p.12-13(BCS). See AnnexF, p.5-6.

<sup>662</sup> [REDACTED].

<sup>663</sup> E.g. [P02715](#), p.16-17(p.11(BCS)).

<sup>664</sup> [P00849](#), p.5,13. See also [REDACTED].

<sup>665</sup> See [REDACTED].



- Borjan VUČKOVIĆ<sub>(DB)</sub> died on 18 December 1991 in a landmine accident at Pajzoš.<sup>666</sup> [REDACTED].<sup>667</sup>
- Aleksandar VUKOVIĆ<sub>(DB)</sub> died in the Bosanski Šamac operations on 1 May 1992.<sup>668</sup>
- [REDACTED].<sup>669</sup>
- Saša MEDAKOVIĆ<sub>(DB)</sub> died in combat in June 1992 [REDACTED], and the SerbianDB paid for his burial expenses and sent payments to his parents in 1994 and 1995.<sup>670</sup>
- Milan DIMIĆ<sub>(DB)</sub> died in Doboј on 13 July 1992, and his father received JATD payments from [REDACTED] 1995.<sup>671</sup>
- Predrag BAKLAJIĆ<sub>(DB)</sub> died in Zvornik in 1993.<sup>672</sup> The SerbianDB paid his funeral expenses,<sup>673</sup> and the JATD sent payments to his father throughout 1994.<sup>674</sup>
- Ljubomir OBRADOVIĆ<sub>(DB)</sub> and Žarko TEOFANOVIĆ<sub>(DB)</sub> died in combat with the Unit in the Skelani area on 9 April 1993.<sup>675</sup> The JATD paid their wives through 1994 and 1995.<sup>676</sup>

155. The names and photos of a number of deceased Unit members displayed in the JSO memorial room included those who died before the JATD was formalised, hanging alongside photographs of people who significantly contributed to the work of the SerbianDB, including BADŽA and KOSTIĆ<sub>(DB)</sub>,<sup>677</sup> after whom the Accused named this centre.

<sup>666</sup> [P00260](#), p.1,4,23,29-35; [REDACTED].

<sup>667</sup> [REDACTED].

<sup>668</sup> [P01938](#), p.257; [REDACTED]; LUKAČDragan:[P02731](#), p.30; LUKAČDragan: [P02732](#), T.1714-1715; [P00846](#), p.3.

<sup>669</sup> [REDACTED].

<sup>670</sup> [P00208](#), p.2-3; [REDACTED]. See AnnexE.4 for payments to relatives.

<sup>671</sup> [P02706](#), p.1,3,9; [REDACTED]. See AnnexE.4 for payments to relatives.

<sup>672</sup> [P00839](#), p.1-8,18[REDACTED]; NIELSENChristian:T.24(15-Nov-2017).

<sup>673</sup> [P03025](#), p.5.

<sup>674</sup> [P00839](#), p.2,3,6. See AnnexE.4 for payments to relatives.

<sup>675</sup> [1D00093](#), p.7; [P02842](#), p.1-4.

<sup>676</sup> [1D00093](#), p.4; [P02842](#), p.1. See AnnexE.4 for payments to relatives.

<sup>677</sup> [REDACTED]; [P00256](#)(00:19:30-00:20:50); [P00849](#), p.5,13; [P02706](#), p.4-5; [P02357](#), p.49.

d. The JATD paylists confirm the Unit's continuity and demonstrate that the Accused financed their SerbianDB special units and others who assisted the SerbianDB, furthering the CCP

156. After the JATD was formalised, it regularly distributed per diems, recorded on paylists.<sup>678</sup> Reflecting the Unit's continuity, veteran Unit members such as BOŽOVIĆ<sub>(DB)</sub>, MIJOVIĆ<sub>(DB)</sub>, RAIĆ<sub>(DB)</sub>, and IVANOVIĆ<sub>(DB)</sub>—whose membership with the Unit had been uninterrupted since 1991<sup>679</sup>—appear on JATD paylists for 1993, 1994, and 1995.<sup>680</sup>

157. The JATD paylists also demonstrate the SerbianDB's connection to and authority over its special units, and others who assisted the SerbianDB, providing insight into which individuals and groups the Accused financed and supported,<sup>681</sup> when, and to some extent, where.<sup>682</sup> The lists were grouped geographically, according to where the members were operating.<sup>683</sup> In addition, JATD paylists reflect payments to units and individuals “who in some way assisted the unit”.<sup>684</sup> For example, the lists reflect that the SDG received payments from the SerbianDB between [REDACTED] and 1995,<sup>685</sup> thereby confirming the coordination between the SerbianDB's special units. **SIMATOVIĆ's** involvement is reflected in his signature on many of the paylists.<sup>686</sup>

158. The Accused had full control over the per diem payments. After RADONJIĆ<sub>(DB)</sub>, or in his absence, KRSMANOVIĆ<sub>(DB)</sub>, signed requests for per diems,<sup>687</sup> **SIMATOVIĆ** would initial the paylists,<sup>688</sup> which were then sent to the SerbianDB 8<sup>th</sup> Administration for further processing.<sup>689</sup> Upon approval by **STANIŠIĆ's** deputy TEPAVČEVIĆ<sub>(DB)</sub>, the funds would be procured.<sup>690</sup> Per diems would then be channelled from Belgrade to the

<sup>678</sup> KRSMANOVIĆDragoslav: [1D00384](#), para.30.

<sup>679</sup> See AnnexA for individual biographies.

<sup>680</sup> See AnnexE.1.

<sup>681</sup> See Annexes E.2 and E.3.

<sup>682</sup> KRSMANOVIĆDragoslav: [1D00386](#), p.6.

<sup>683</sup> KRSMANOVIĆDragoslav: [1D00386](#), p.6(per diem lists were grouped geographically according to where they were operating); KRSMANOVIĆDragoslav: [1D00391](#); [REDACTED]. Compare [REDACTED] and e.g. [REDACTED]; [REDACTED], [REDACTED]. See also AnnexE.2; [REDACTED]; AnnexE.4.

<sup>684</sup> KRSMANOVIĆDragoslav: [1D00384](#), para.50.

<sup>685</sup> Cross-reference Section [II.D.2\(b\)\(v\)](#); Section [II.F.5\(b\)\(i\)-\(iv\)](#); AnnexE.2.

<sup>686</sup> [REDACTED] [1D00400](#); [REDACTED]; [P00828](#), p.1(BCS); [P01155](#), p.1(BCS).

<sup>687</sup> KRSMANOVIĆDragoslav: [1D00384](#), para.49.

<sup>688</sup> [REDACTED]. See also [REDACTED]; [1D00400](#).

<sup>689</sup> KRSMANOVIĆDragoslav: [1D00384](#), para.49;

<sup>690</sup> KRSMANOVIĆDragoslav: [1D00384](#), para.49; [REDACTED].

field.<sup>691</sup> Someone—not necessarily the per diem recipients—would sign the lists to indicate that the money was received from the SerbianDB.<sup>692</sup> For instance, JATD members, such as pilots or [REDACTED], often delivered the money from Belgrade, and signed for the entire list.<sup>693</sup>

159. While some of the paylists are undated or omit a year, it is possible to establish this information by reviewing the paylists in their entirety and alongside other evidence in the case. [REDACTED],<sup>694</sup> [REDACTED],<sup>695</sup> [REDACTED].<sup>696</sup> [REDACTED].<sup>697</sup> [REDACTED].<sup>698</sup> The remaining [REDACTED] partially dated paylists relate to 1994 until the dated payroll for 16-31 May 1994.<sup>699</sup> These are dated from 17 January through to 15 May,<sup>700</sup> [REDACTED].<sup>701</sup>

(vii) The JSO was the same Unit formed in May 1991

160. In early 1996, the Accused incorporated the Unit into the official SerbianDB structure and renamed it the JSO,<sup>702</sup> after years of criminal operations conducted in the shadows.<sup>703</sup> As evidenced by numerous personnel files, the JSO recognised members of the JPN and the JATD as having joined the same Unit, retroactively referring to both as “JSO”.<sup>704</sup>

161. At the KOSTIĆ Centre ceremony, after **SIMATOVIĆ** praised the Unit’s wartime activities, **STANIŠIĆ** and **MILOŠEVIĆ** recognised and awarded Unit members

<sup>691</sup> KRSMANOVIĆDragoslav: [1D00384](#), para.31.

<sup>692</sup> [REDACTED]; SLIŠKOVIĆDejan:T.8(12-Jul-2018).

<sup>693</sup> [REDACTED]; [P00855](#)(pilot “MAJK” was Milutin RADIVOJEVIĆ); [REDACTED]; KRSMANOVIĆDragoslav: [1D00384](#), para.31.

<sup>694</sup> See AnnexE.1.

<sup>695</sup> [REDACTED].

<sup>696</sup> [REDACTED].

<sup>697</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P03799](#). See also [REDACTED]; [REDACTED]; [REDACTED] [REDACTED].

<sup>698</sup> [REDACTED]. See [REDACTED]; [REDACTED].

<sup>699</sup> [P02589](#).

<sup>700</sup> [REDACTED]; [P02582](#)(BCS); [P02583](#)(BCS); [P02584](#)(BCS); [P02585](#)(BCS); [P02586](#); [P02587](#); [P02588](#). See SerbianDB bookkeeping records from the first half of 1994 relevant for confirming that a number of the partially undated paylists are from January-May 1994: [P03012-P03015](#) [REDACTED].

<sup>701</sup> [REDACTED].

<sup>702</sup> [REDACTED].

<sup>703</sup> [P00256](#)(00:13:15-00:13:20), p.9.

<sup>704</sup> [P02704](#), p.1; [P02357](#), p.6; [P02716](#), p.1-2; [P02863](#), p.5-6,11; [P02864](#), p.38; [P02818](#), p.23; [P00160](#), p.47; [P02834](#), p.42,57,70; [P00855](#), p.4-5; [P00233](#), p.3; [P00234](#), p.2; [REDACTED]; [P02591](#), p.1; [P02590](#), p.; [P02843](#), p.4-6; [REDACTED]; [P02872](#), p.1, 34; [REDACTED].

individually for their “successes”.<sup>705</sup> The operations that both Accused praised involved horrific, violent crimes against non-Serbs to advance the CCP. A wall map of Yugoslavia at the JSO’s KOSTIĆ Centre marked the Unit’s wartime camps with the grey wolf emblem that had been the Unit’s insignia,<sup>706</sup> commemorating its involvement in operations that expelled thousands of non-Serbs from 1991-1995, and confirming that this was one and the same Unit, continuously operating at the Accused’s direction.

(b) STANIŠIĆ and SIMATOVIĆ, along with other SMUP JCE members, had authority over ARKAN and the SDG, and deployed them to further the CCP

162. STANIŠIĆ and SIMATOVIĆ used the SDG to commit crimes furthering the CCP from 1991 to 1995.<sup>707</sup> The Accused exercised authority over ARKAN and his SDG throughout the Indictment period: directly, through the *vojna linija*, through their subordinates in the SerbianDB and the Unit, and in coordination with their fellow SMUP JCE members. The Accused gave the SDG the full protection and support of the SMUP, both the SerbianDB and SerbianJB, enabling and sustaining the SDG in furthering the CCP. By 1994—when the SDG’s notorious criminality was beyond question<sup>708</sup>—the Accused directly deployed and financed the SDG in operations alongside the Unit and the Scorpions. [REDACTED] explained that despite the lack of a formalised relationship, the SDG was “under the command of Jovica STANIŠIĆ and Franko SIMATOVIĆ”.<sup>709</sup>

(i) JCE members in the SMUP exercised authority over ARKAN and the SDG’s activities in Croatia through the *vojna linija* in 1990-1991

163. By late 1990, ARKAN’s longstanding association with the FederalDB was taken over by SMUP, particularly the SerbianDB,<sup>710</sup> just as the SerbianDB began to assume the FSUP’s other responsibilities and assets.<sup>711</sup> Working with the SerbianDB to pursue an ethnic war offered ARKAN the perfect opportunity to pair his Serb nationalism with his

<sup>705</sup> [P00256](#), p.26-27.

<sup>706</sup> [P00537](#)(00:01:17)(00:01:50-00:02:50).

<sup>707</sup> Cross-reference Section [III.B.2\(c\)\(i\)](#)a-b; Section [III.B.2\(c\)\(ii\)](#)a-d; Section [III.B.2\(d\)](#).

<sup>708</sup> ARKAN had been openly included on a list of suspected war criminals by the then-US Secretary of State by December 1992. ANASTASIJEVIĆDejan:[P02423](#), para.143; [P02429](#), p.2. See also [P00020](#), p.2-6; STEVANOVIĆObiad:T.9(30-Sep-2020).

<sup>709</sup> [REDACTED]; NIELSENChristian:T.62(16-Nov-2017); SAVIĆBorivoje:[P00449](#), para.166,173; SAVIĆBorivoje:[P00450](#), para.3; SAVIĆBorivoje:T.67(12-Sep-2017); [P01787](#); [REDACTED]; ANASTASIJEVIĆDejan:T.12-15(14-Jun-2018); [P00852](#), p.1,9,11.

<sup>710</sup> [REDACTED]; ANASTASIJEVIĆDejan:T.12,58(14-Jun-2018); VASILJEVIĆAleksandar:T.24-25(6-Feb-2019); SAVIĆBorivoje:T.68(12-Sep-2017); [REDACTED].

<sup>711</sup> Cross-reference Section [II.E.1\(c\)](#).

extensive experience with DB tactics,<sup>712</sup> including extrajudicial killings.<sup>713</sup> ARKAN was not formally associated with the SMUP; rather, SMUP officials who were involved with the *vojna linija*—most prominently BOGDANOVIĆ, BADŽA, and STANIŠIĆ—coopted ARKAN, deploying him in ethnic cleansing operations pursuing the CCP throughout its existence.<sup>714</sup> Established in late 1990 by ARKAN to be a Serb Army,<sup>715</sup> the SDG was perfectly suited to the needs of the CCP, and through the SMUP, it was quickly incorporated into the Serb Forces implementing it.

164. For the entirety of the JCE, ARKAN, STANIŠIĆ, BADŽA, and the remaining JCE membership coordinated their activities in a manner leaving no doubt as to their shared intent to implement the CCP.<sup>716</sup> As SMUP officials acting outside their lawful roles as part of the *vojna linija*, STANIŠIĆ, SIMATOVIĆ, and BOGDANOVIĆ were key in early preparations for the CCP, including enabling and protecting ARKAN and his unit:<sup>717</sup>

- BOGDANOVIĆ worked with ARKAN to unify the *Delijes*, a core group of whom founded the SDG on 11 October 1990.<sup>718</sup> [REDACTED],<sup>719</sup> corroborating the SDG's ties to the SerbianDB from the outset.
- In November 1990 ARKAN met with STANIŠIĆ and SIMATOVIĆ's proxy in Krajina, Dušan ORLOVIĆ<sub>(DB)</sub>,<sup>720</sup> along with Neso MANDINIĆ<sub>(DB)</sub><sup>721</sup> and JCE member MARTIĆ to utilise ARKAN's newly organised unit to bring arms to Krajina and take over a police station to annex it to the Knin SUP<sup>722</sup>—the very kinds of activities for which ORLOVIĆ<sub>(DB)</sub> and MARTIĆ took instruction directly from STANIŠIĆ and SIMATOVIĆ.<sup>723</sup>

<sup>712</sup> See [P00382](#), p.2.

<sup>713</sup> [REDACTED]; [P00018](#), p.2; SAVIĆBorivoje:T.68(12-Sep-2017); [REDACTED]; [P02431](#); [P02429](#).

<sup>714</sup> VASILJEVIĆAleksandar:[P02690](#); VASILJEVIĆAleksandar:[P02691](#); VASILJEVIĆAleksandar:[P02686](#); [REDACTED]; ANASTASIJEVIĆDejan:T.12, T.58(14-Jun-2018). See ANASTASIJEVIĆDejan:[P02423](#), para.96. See also [P00059](#)(00:34:19-00:34:44), p.9-10.

<sup>715</sup> NOVAKOVIĆStojan:T.11(6-Oct-2020); NOVAKOVIĆStojan:T.63-64(7-Oct-2020).

<sup>716</sup> Cross-reference Section [II.F](#).

<sup>717</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>718</sup> [REDACTED]. See [P00852](#), p.12. Cross-reference Section [II.C.5](#).

<sup>719</sup> [REDACTED]. [REDACTED].

<sup>720</sup> BABIĆMilan:[P01246](#), T.13491-13492; [REDACTED]. Cross-reference Section [II.F.1\(b\)\(i\)b](#).

<sup>721</sup> BABIĆMilan:[P01246](#), T.13492.

<sup>722</sup> [P03746](#), p.4-5; [P03857](#), p.1-3.

<sup>723</sup> E.g. [REDACTED]; BABIĆMilan:[P01248](#), T.1417-1418,1807-1808; [REDACTED]. Cross-reference Section [II.E.2\(a\)](#); Section [II.F.1\(b\)\(i\)a-b](#).

- When ARKAN was arrested by Croatian authorities while transporting weapons to Krajina,<sup>724</sup> **STANIŠIĆ** was informed,<sup>725</sup> and BOGDANOVIĆ arranged for ARKAN's release and return to Belgrade in mid-1991.<sup>726</sup>
- In July 1991 ARKAN and the *Delijes* coordinated weapons transports with MARTIĆ and MANDINIĆ<sub>(DB)</sub> from Belgrade to Krajina,<sup>727</sup> facilitated by **STANIŠIĆ**.<sup>728</sup>

165. The SMUP empowered and supported ARKAN's SDG in SAO-SBWS beginning in July 1991,<sup>729</sup> where they were immediately effective in advancing the CCP.<sup>730</sup> As the "first and foremost" member of the *vojna linija*,<sup>731</sup> **STANIŠIĆ** exercised overall authority over the SDG, while BADŽA directed their activities on the ground with SMUP support:

- Prior to arriving in SAO-SBWS—before he had met BADŽA<sup>732</sup>—ARKAN informed an official close to HADŽIĆ that he worked for **STANIŠIĆ**.<sup>733</sup> This was borne out in the SAO-SBWS Interior Minister's later observation that **STANIŠIĆ** was the link between MILOŠEVIĆ on the one hand, and BADŽA and ARKAN on the other, controlling SAO-SBWS events from Belgrade.<sup>734</sup>
- From May to July 1991—leading up to the first SBWS takeovers—BOGDANOVIĆ (who was no longer officially affiliated with the SMUP, but still wielded significant influence and closely coordinated with **STANIŠIĆ**)<sup>735</sup> signed

<sup>724</sup> [P03180](#); [P03754](#); [P03856](#), p.1; [P00020](#), p.2; [REDACTED].

<sup>725</sup> [P03180](#). Note **STANIŠIĆ**'s handwritten initials at the top of the page; compare with AnnexF, p.3-4. See also MIČIĆRadivoje:T.4(4-Mar-2020); [P00020](#), p.2.

<sup>726</sup> [REDACTED]; NOVAKOVIĆStojan:T.17-18(6-Oct-2020); [REDACTED].

<sup>727</sup> [P00383](#); [P00384](#); [REDACTED]; VASILJEVIĆAleksandar:T.17-18,22-24(30-Jan-2019); NOVAKOVIĆStojan:T.11(8-Oct-2020).

<sup>728</sup> [P00857](#); THEUNENSReynaud:T.97-99(22-Mar-2018); NIELSENChristian:T.106-107(23-Nov-2017); [P00852](#), p.9.

<sup>729</sup> [REDACTED]; VASILJEVIĆAleksandar:T.26-27,29-31(5-Feb-2019); VASILJEVIĆAleksandar:T.24-25(6-Feb-2019); [REDACTED] ANASTASIJEVIĆDejan:[P02423](#), para.90-91; [REDACTED]; [P03180](#); [REDACTED]; [P00593](#), p.1.

<sup>730</sup> Cross-reference Section [II.F.2\(f\)\(i\)](#); Section [II.F.2\(g\)](#); Section [II.F.2\(h\)\(i\)](#); Section [III.B.2\(c\)\(i\)](#)a-b; Section [III.B.2\(c\)\(ii\)](#)a-d; Section [III.B.2\(d\)](#).

<sup>731</sup> VASILJEVIĆAleksandar:[P02686](#), T.15885-15886. Cross-reference Section [II.E.1\(a\)](#).

<sup>732</sup> [REDACTED].

<sup>733</sup> SAVIĆBorivoje:[P00449](#), para.166,173; SAVIĆBorivoje:[P00450](#), para.3-4; SAVIĆBorivoje:T.67(12-Sep-2017); SAVIĆBorivoje:T.3(13-Sep-2017). See also [P00486](#), p.1.

<sup>734</sup> BOGUNOVIĆBorislav:[P02719](#), para.18,22; BOGUNOVIĆBorislav:[P02720](#), T.6061-6063. See [REDACTED].

<sup>735</sup> Cross-reference Section [II.C.2](#).

a permit allowing ARKAN (a known criminal<sup>736</sup>) to cross from Serbia into SAO-SBWS armed with weapons.<sup>737</sup> **STANIŠIĆ**'s operative KOSTIĆ<sub>(DB)</sub> had the same permit,<sup>738</sup> evidence that ARKAN, like KOSTIĆ<sub>(DB)</sub>, had **STANIŠIĆ**'s backing.

- With BADŽA's arrival in Erdut, he became ARKAN's superior on the ground, providing day-to-day oversight of the SDG's activities.<sup>739</sup> ARKAN nonetheless maintained a great deal of autonomy, reflecting the trust of the Belgrade authorities and **STANIŠIĆ**, through the *vojna linija*.<sup>740</sup>
- The SerbianDB recruited Milorad ULEMEK aka LEGIJA<sub>(DB)</sub> from abroad in 1991 "to command paramilitary units", whereupon he joined the SDG and in 1992 assumed the position of ARKAN's Deputy Commander.<sup>741</sup>
- Following **STANIŠIĆ**'s lead, BADŽA<sup>742</sup> and SerbianDB affiliates in SAO-SBWS police structures (notably KOJIĆ<sub>(DB)</sub> and KOSTIĆ<sub>(DB)</sub><sup>743</sup>) continued to guarantee ARKAN and the SDG's impunity within the purview of their respective roles and authority in SAO-SBWS, even as ARKAN and the SDG engaged in widespread crimes against non-Serbs.<sup>744</sup> [REDACTED],<sup>745</sup> which could only have been with **STANIŠIĆ**'s approval.
- A number of SDG members who participated in operations in SBWS were subsequently paid by the SerbianDB for other wartime deployments.<sup>746</sup>

166. Intelligence services confirmed the SerbianDB's control over and SMUP's support for the SDG in this early period. The Chief of the JNA Security Organ testified that ARKAN's SDG were operating under the "jurisdiction of the Serbian MUP", with

<sup>736</sup> STEVANOVIĆObrad:T.9(30-Sep-2020); [P00020](#), p.2-6.

<sup>737</sup> [REDACTED].

<sup>738</sup> BOGUNOVIĆNebojša:T.30(4-Sep-2019); [REDACTED]; BOGUNOVIĆNebojša:T.23(3-Sep-2019).

<sup>739</sup> Cross-reference Section [II.F.2\(f\)\(i\)](#).

<sup>740</sup> BOGUNOVIĆBorislav:[P02719](#), para.23; [REDACTED]; VASILJEVIĆAleksandar:[P02690](#); VASILJEVIĆAleksandar:[P02691](#); [P00486](#), p.4; [P03387](#), p.3-5.

<sup>741</sup> VASILJEVIĆAleksandar:T.40(6-Feb-2019); [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.97; [P00842](#), p.1,4; [REDACTED].

<sup>742</sup> Cross-reference Section [II.F.2\(f\)\(i\)](#). [REDACTED].

<sup>743</sup> VASILJEVIĆAleksandar:T.29-31,34(5-Feb-2019); [REDACTED].

<sup>744</sup> Cross-reference Section [III.B.2\(c\)\(i\)](#)a-b; Section [III.B.2\(c\)\(ii\)](#)a-d; Section [III.B.2\(d\)](#).

<sup>745</sup> [REDACTED]. Cross-reference Section [II.F.2\(b\)](#).

<sup>746</sup> [REDACTED]. See AnnexA, AnnexE.1, and AnnexE.2: Dragan PETROVIĆ aka KAJMAN<sub>(DB)</sub>, [REDACTED].



**STANIŠIĆ** and **BADŽA** coordinating their SAO-SBWS operations.<sup>747</sup> Contemporaneous JNA intelligence reports had information indicating that **ARKAN**'s crimes in the SAO-SBWS were perpetrated with "the full support of the SDB of Serbia"<sup>748</sup> and that **ARKAN** was "openly supported" by the SMUP, among other Serbian institutions,<sup>749</sup> which supplied him with weapons.<sup>750</sup> A VJ intelligence report from November 1992 included **ARKAN**, alongside well-known SerbianDB Unit members **IVANOVIĆ<sub>(DB)</sub>** and **BOŽOVIĆ<sub>(DB)</sub>**, among a number of criminals present in the SBWS who were closely connected to **STANIŠIĆ**, **SIMATOVIĆ**, and **KOSTIĆ<sub>(DB)</sub>**.<sup>751</sup> Later VJ intelligence analysis corroborated these early reports, confirming that the SDG was engaged in the RSK and RS as a SerbianDB or SMUP special unit since the beginning of the war in 1991.<sup>752</sup> CIA intelligence in October 1995 similarly indicated that the SDG was equipped and controlled by the SerbianDB, and had formed the Erdut training centre in 1991 with SerbianDB support.<sup>753</sup> Senior British diplomat Sir Ivor **ROBERTS** concluded from his intelligence sources that **ARKAN** worked for the SerbianDB.<sup>754</sup>

167. Evidence that **ARKAN**'s SDG was a unit of the SMUP generally, as opposed to a unit of the SerbianDB specifically, also establishes **STANIŠIĆ**'s responsibility for **ARKAN**'s crimes. Not only was **STANIŠIĆ** personally involved in the events in SAO-SBWS,<sup>755</sup> but he was also the most powerful person in the SMUP at the time, with Minister **SOKOLOVIĆ** and SerbianDB Chief **JANAČKOVIĆ** above him in name only.<sup>756</sup> When **SOKOLOVIĆ** denied knowledge of **ARKAN**'s activities, Aleksandar **VASILJEVIĆ**, head of the JNA's Security Administration,<sup>757</sup> demanded that **STANIŠIĆ** attend their meeting because **STANIŠIĆ** would certainly know.<sup>758</sup> **JANAČKOVIĆ**, who

<sup>747</sup> **VASILJEVIĆ**Aleksandar:[P02693](#), T.15806; [REDACTED] See also [P00794](#), p.1-2; [REDACTED].

<sup>748</sup> [P00490](#), p.2.

<sup>749</sup> [P00486](#), p.4.

<sup>750</sup> [P00491](#).

<sup>751</sup> [2D00144](#).

<sup>752</sup> [P00849](#), p.2(The year is derived from the comment that on 4 May "this year" the JSO name was officially announced); **NIELSEN**Christian:T.60-61(15-Nov-2017); [P01974](#), p.1-2; **THEUNENS**Reynaud:T.45(7-Mar-2018); [P03270](#), p.4-5(undated intelligence report similar in form, style, and content to other VJ intelligence reports (e.g. [P03268](#) and [P03273](#))).

<sup>753</sup> [P00852](#), p.11,13.

<sup>754</sup> **ROBERTS**Ivor:T.33(15-Oct-2019); **ROBERTS**Ivor:[1D00432](#), p.9.

<sup>755</sup> Cross-reference Section [II.E.2\(b\)](#); Section [II.F.2](#).

<sup>756</sup> **VASILJEVIĆ**Aleksandar:[P02694](#); [REDACTED]. Cross-reference Section [II.B.1](#).

<sup>757</sup> **VASILJEVIĆ**Aleksandar:T.5(28-Jan-2019).

<sup>758</sup> **VASILJEVIĆ**Aleksandar:T.15(30-Jan-2019); [REDACTED].

lacked any meaningful authority in the SMUP,<sup>759</sup> “objectively knew little about the situation” with the SDG.<sup>760</sup>

168. Given **STANIŠIĆ**’s lead role in the *vojna linija*,<sup>761</sup> *de facto* authority over BADŽA in the SMUP,<sup>762</sup> and close cooperation with BADŽA as a fellow JCE member, BADŽA’s own relationship with ARKAN as his field commander reinforces **STANIŠIĆ**’s responsibility for the crimes of ARKAN and the SDG.<sup>763</sup> Moreover, if, as the Defence assert, BADŽA was officially on leave from the SMUP during his SAO-SBWS deployment, the SMUP’s institutional support for ARKAN and the SDG in SAO-SBWS in 1991 could undoubtedly only have been provided with **STANIŠIĆ**’s approval.

(ii) **STANIŠIĆ** ensured that the SMUP protected ARKAN and the SDG

169. During 1991-1995,<sup>764</sup> **STANIŠIĆ** used his substantial official authority as the leader of the SerbianDB to ensure that ARKAN benefited from the SMUP’s protection despite the SDG’s increasingly notorious crimes<sup>765</sup> and ARKAN openly recruiting, training and arming an illegal paramilitary unit in Serbia and Croatia,<sup>766</sup> freely admitting he committed murders,<sup>767</sup> [REDACTED],<sup>768</sup> trafficking and selling weapons,<sup>769</sup> and flaunting restrictions on his movement and activities.<sup>770</sup> Notably, **STANIŠIĆ** bears responsibility for the SMUP’s failure to arrest, disarm or otherwise prevent or impede ARKAN or the SDG from engaging in criminal activities as required under OA

<sup>759</sup> VASILJEVIĆAleksandar:[P02694](#).

<sup>760</sup> VASILJEVIĆAleksandar:[P02692](#); [REDACTED].

<sup>761</sup> VASILJEVIĆAleksandar:[P02690](#); VASILJEVIĆAleksandar:[P02691](#); VASILJEVIĆAleksandar:[P02686](#); [REDACTED]. *Cross-reference* Section [II.E.1\(a\)](#).

<sup>762</sup> *Cross-reference* Section [II.B.3\(a\)](#). The Defence led evidence that once BADŽA was promoted to Deputy Minister of the SMUP, he became hierarchically **STANIŠIĆ**’s superior, but even if this appointment had the effect of diminishing **STANIŠIĆ**’s *de facto* authority over BADŽA, this only occurred in August 1993. During all of the SDG’s subsequent operations, they were deployed by **SIMATOVIĆ** personally and paid per diems by the SerbianDB. *See* STEVANOVIĆObrad:T.7(24-Sep-2020); MILOŠEVIĆMilan:T.4(25-Feb-2020); [P03255](#), p.1; NIELSENChristian:[P00850](#), para.108. *See also* AnnexE.2.

<sup>763</sup> *See* BOGUNOVIĆBorislav:[P02719](#), para.18,22; [REDACTED].

<sup>764</sup> [REDACTED].

<sup>765</sup> *Cross-reference* Section [III.B.2\(c\)](#)-(d).

<sup>766</sup> [P01083](#), p.7; [REDACTED]; VASILJEVIĆAleksandar:T.24(6-Feb-2019); [P03027](#); [REDACTED]; STEVANOVIĆObrad:T.11(30-Sep-2020). *See* [REDACTED]. *See also* [REDACTED].

<sup>767</sup> [REDACTED]; [P01198](#); [P02653](#); [P00053](#), p.26; [REDACTED].

<sup>768</sup> [REDACTED].

<sup>769</sup> [P01083](#), p.7; [P00383](#), p.2-3; [REDACTED].

<sup>770</sup> [REDACTED]; [P00852](#), p.13-14.

Tomson.<sup>771</sup> High level insider witnesses independently observed that the SMUP's "absolute control" over ARKAN was evident from the fact that guards carrying long-barrelled weapons were stationed outside his buildings in Belgrade, and the police did not intervene.<sup>772</sup>

170. [REDACTED].<sup>773</sup> However, although he exercised influence after resigning as SMUP Minister, BOGDANOVIĆ had no official authority over the police or SerbianDB by June 1991.<sup>774</sup> BADŽA was not in a position to set SMUP policy until his promotion to SerbianJB Chief on 31 December 1991, and there is no evidence of a predecessor SerbianJB Chief being involved in policy related to ARKAN in 1991.<sup>775</sup> The SerbianDB policy to protect ARKAN was, therefore, STANIŠIĆ's policy.

171. BOGDANOVIĆ and BADŽA played a significant role in ARKAN's activities through the *vojna linija* during the 1991 SAO-SBWS operation;<sup>776</sup> but only STANIŠIĆ had both the official institutional ability and power to ensure that the SMUP protected and enabled the SDG's activities in 1991.<sup>777</sup> The climate of impunity fostered under STANIŠIĆ's leadership in 1991 became all the more entrenched with the promotion of STANIŠIĆ and BADŽA to Assistant SMUP Minister positions, and persisted for the remainder of the Indictment period.<sup>778</sup>

(iii) SDG relationships with other JCE members and the organs they controlled did not undermine the Accused's control

172. Throughout the Indictment period, the SDG was ostensibly resubordinated to conceal their deployments and connections to the SerbianDB and SMUP. Various stratagems—[REDACTED]—were used to dupe international observers.<sup>779</sup> In actuality, however, ARKAN's unit remained under the Accused's authority.

<sup>771</sup> Cross-reference Section [II.B.3\(a\)](#); [REDACTED]. See also [1D00085](#); [REDACTED]; [P01083](#), p.7; [REDACTED]; [P01198](#), p.1-2; [P00383](#), p.2-3; [REDACTED].

<sup>772</sup> VASILJEVIĆAleksandar:T.24-25(6-Feb-2019); [REDACTED].

<sup>773</sup> [REDACTED].

<sup>774</sup> Cross-reference Section [II.C.2](#).

<sup>775</sup> Cross-reference Section [II.C.4](#).

<sup>776</sup> E.g. VASILJEVIĆAleksandar:T.13(30-Jan-2019); [REDACTED]. Cross-reference Section [II.F.2\(f\)\(i\)](#); Section [II.C.2](#); Section [II.C.4](#).

<sup>777</sup> See STEVANOVIĆObrad:T.12(30-Sep-2020). See also [REDACTED].

<sup>778</sup> [REDACTED].

<sup>779</sup> [REDACTED]. Cross-reference Section [II.F.3\(c\)](#).

173. The SDG cooperated with or was resubordinated for operational purposes to other Serb Forces such as the JNA, VRS, SVK, RSK-MUP, and RS-MUP.<sup>780</sup> [REDACTED].<sup>781</sup>

174. Apart from the occasions when the SDG was resubordinated for specific operational purposes, the JNA, VRS, SVK, RSK-MUP, and RS-MUP did not exercise control over the SDG.<sup>782</sup> For example:

- At the end of 1991, when the SFRY Presidency ordered all volunteer formations to be placed under JNA command, the units under SerbianDB patronage—the Unit and SDG—maintained their independence.<sup>783</sup> General Andrija BIORČEVIĆ and Colonel Boro IVANOVIĆ—JNA officers with whom ARKAN was willing to align himself—were, like ARKAN, operating in the *vojna linija*, reporting up through STANIŠIĆ to MILOŠEVIĆ.<sup>784</sup>
- In December 1991, the Chief of the JNA General Staff Blagoje ADŽIĆ reported that ARKAN “allegedly” belonged to the TO, but that his unit “do[es] not obey anybody”.<sup>785</sup>
- In early 1992, the command of the 12<sup>th</sup> Corps Security Organ reported that ARKAN was “officially subordinated” to the 12<sup>th</sup> Corps, “but only in formal terms”, as seen from the fact that he entered and left combat when he wanted.<sup>786</sup>
- Also in early 1992, ARKAN’s SDG were recast as RSK-MUP, but only nominally in order to subvert the Vance Plan.<sup>787</sup>

<sup>780</sup> Cross-reference Section [II.F.2\(f\)\(i\)](#); Section [II.F.3\(c\)](#); Section [II.F.5\(b\)\(ii\)b](#); Section [II.F.5\(b\)\(iii\)\(a\)](#); Section [II.F.5\(b\)\(iv\)b](#). See THEUNENSReynaud:[P01980](#), p.260-261,322; [P01952](#); [P01978](#); THEUNENSReynaud:T.74-75(6-Mar-2018); THEUNENSReynaud:T.57(7-Mar-2018); THEUNENSReynaud:T.60(21-Mar-2018).

<sup>781</sup> [REDACTED] [REDACTED].

<sup>782</sup> VASILJEVIĆAleksandar:T.34-35,37-38(5-Feb-2019); [REDACTED]; BOGUNOVIĆBorislav:[P02719](#), para.22-23; [P00486](#), p.4; [P03387](#), p.4; [P03394](#), p.11,14; [2D00160](#); [REDACTED]; [P02960](#), p.16; [P03466](#); [P03268](#), p.3.

<sup>783</sup> [P02699](#), p.2; [P03387](#), p.3-5; VASILJEVIĆAleksandar:T.40(5-Feb-2019). See also [P03285](#).

<sup>784</sup> [REDACTED]; VASILJEVIĆAleksandar:[P02689](#), T.15890; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.38-40,96; ANASTASIJEVIĆDejan:T.40(13-Jun-2018); ANASTASIJEVIĆDejan:T.3(14-Jun-2018).

<sup>785</sup> [P03387](#), p.4.

<sup>786</sup> [P00486](#), p.4.

<sup>787</sup> Cross-reference Section [II.F.3\(c\)](#).

- While nominally under the RS-MUP in the ARK operations in 1995, ARKAN's men [REDACTED];<sup>788</sup> ARKAN "did whatever he wanted while in the field, and [REDACTED]."<sup>789</sup>
- In a letter to KARADŽIĆ and M.STANIŠIĆ on 23 September 1995, VRS Main Staff Commander Ratko MLADIĆ stated that ARKAN's unit had not reported to the VRS command, noting that it was acting "independently of the VRS" in Sanski Most and mistreating VRS officers.<sup>790</sup>

(iv) STANIŠIĆ and SIMATOVIĆ exercised authority over ARKAN and the SDG's deployment to BiH in 1992

175. The SDG continued to operate under the Accused's authority in BiH in 1992, targeting non-Serbs with violent crimes to expel them from Bijeljina, Zvornik, and Brčko. [REDACTED].<sup>791</sup> [REDACTED].<sup>792</sup> JCE member ŠEŠELJ, whose SRS volunteers had participated alongside the SDG in the Zvornik attack,<sup>793</sup> said that it was "key people of the State Security Service who thought it up, among them Franko SIMATOVIĆ Frenki. He was also one of the key executors."<sup>794</sup> [REDACTED] the SDG had been directed to Bijeljina, Zvornik, and Brčko by the SMUP.<sup>795</sup> [REDACTED].<sup>796</sup>

176. This is consistent with evidence that the Bosnian Serb leadership consulted with MILOŠEVIĆ, STANIŠIĆ, and other Belgrade authority-figures [REDACTED], [REDACTED].<sup>797</sup> M.STANIŠIĆ, who had *de jure* power to prevent ARKAN's men from entering Bijeljina, Zvornik, and Brčko, refrained from doing so specifically because ARKAN's unit had been directed to the area by STANIŠIĆ, [REDACTED].<sup>798</sup>

177. The details of the SDG's deployment in BiH demonstrate that they were acting under the Accused's authority. For example:

<sup>788</sup> [REDACTED].

<sup>789</sup> [REDACTED].

<sup>790</sup> [2D00160](#), p.2.

<sup>791</sup> [REDACTED].

<sup>792</sup> [REDACTED]. See [REDACTED].

<sup>793</sup> Cross-reference Section [III.C.2.](#)

<sup>794</sup> [P00004](#)(01:05:25-01:07:33), p.28-29; [REDACTED].

<sup>795</sup> [1D00067](#), p.6; [REDACTED].

<sup>796</sup> [REDACTED].

<sup>797</sup> [REDACTED]. See [REDACTED].

<sup>798</sup> [REDACTED]; [1D00067](#), p.6. Cross-reference Section [II.F.4\(a\)\(ii\)b.](#)

- Located in Serbia on the border near Bijeljina, ARKAN would only have been able to establish and operate the Popovi training camp with the approval of the SerbianDB, given the number of soldiers present (ARKAN's men and MAUZER<sub>(DB)</sub>'s volunteers), the quantity of weapons and other equipment transported to and erected on Serbia's territory, and the intensive military training conducted there.<sup>799</sup>
- With BiH slipping into war and the resulting tightened border security, ARKAN would only have been able to make the necessary transport of fighters, weapons, and equipment through Serbia to BiH, with the approval of the SerbianDB.<sup>800</sup>
- Ljubiša SAVIĆ aka MAUZER<sub>(DB)</sub>, the Bijeljina local who ARKAN trained for the Bijeljina operation, was one of STANIŠIĆ's contacts in Bijeljina, and known to be affiliated with the SerbianDB.<sup>801</sup>
- [REDACTED].<sup>802</sup> [REDACTED].<sup>803</sup> [REDACTED].<sup>804</sup> Considering that KOSTIĆ<sub>(DB)</sub> was already reporting to the 2<sup>nd</sup> Administration by 1992,<sup>805</sup> and the involvement of both Accused in ARKAN's deployment to BiH discussed above, both Accused must have been behind tasking KOSTIĆ<sub>(DB)</sub>.
- When LEGIJA<sub>(DB)</sub> was arrested on the eve of the takeover in Zvornik, SerbianDB associate Marko PAVLOVIĆ<sub>(DB)</sub>, and *vojna linija* member JNA General BOŠKOVIĆ (who owed his position and was loyal to STANIŠIĆ)<sup>806</sup> ensured his release.<sup>807</sup>

178. The SerbianDB records of SDG members who participated in the Bijeljina/Zvornik operations document both Accused's links to them. For example,

<sup>799</sup> Cross-reference Section [II.F.4\(b\)\(i\)a](#); [REDACTED]. See THEUNENSReynaud:T.76,81-82(7-Mar-2018); [REDACTED]; NIELSENChristian:T.17(14-Nov-2017).

<sup>800</sup> [REDACTED]. See [REDACTED].

<sup>801</sup> [REDACTED]; [1D00036](#), p.76-81; [P00852](#), p.14; SLIŠKOVIĆDejan:[P02538](#), para.18.

<sup>802</sup> [REDACTED]

<sup>803</sup> [REDACTED].

<sup>804</sup> [REDACTED].

<sup>805</sup> E.g. [REDACTED].

<sup>806</sup> [REDACTED]; ANASTASIJEVIĆDejan:T.54(19-Jun-2018); ANASTASIJEVIĆDejan:T.6-9(14-Jun-2018).

<sup>807</sup> MUJIĆFadil:[P01683](#), para.39-40,42; MUJIĆFadil:[P01684](#), para.10-14,17-18; MUJIĆFadil:T.15-16,20-21(27-Feb-2018); OFS-23:T.41(15-Sep-2020); [REDACTED]. See VASILJEVIĆAleksandar:T.41-42(31-Jan-2019).

Nenad BUJOŠEVIĆ aka Veliki RAMBO<sub>(DB)</sub>, who participated in combat in Zvornik as a long-standing SDG member, later joined the SerbianDB and has a SerbianDB personnel file.<sup>808</sup> SDG members who participated in the Bijeljina/Zvornik operations were subsequently paid by the SerbianDB for other wartime deployments.<sup>809</sup>

(v) SIMATOVIĆ reactivated and sustained ARKAN and the SDG in 1994-1995

179. [REDACTED],<sup>810</sup> [REDACTED].<sup>811</sup> ARKAN's subordinate relationship to STANIŠIĆ and SIMATOVIĆ is demonstrated by the comprehensive support the SerbianDB provided to the SDG in 1994-1995, including during operations where they committed crimes furthering the CCP:

- The SerbianDB made it possible for ARKAN and the SDG to cross borders between Serbia and BiH or Croatia carrying weapons for their various operations, [REDACTED].<sup>812</sup> [REDACTED].<sup>813</sup> The SerbianDB facilitated the SDG's deployment across borders for the Pauk, Trnovo/Treskavica, and ARK operations, [REDACTED].<sup>814</sup>
- ARKAN's SDG received ammunition, food and supplies from [REDACTED].<sup>815</sup>
- The SerbianDB facilitated [REDACTED],<sup>816</sup> [REDACTED].<sup>817</sup> [REDACTED]<sup>818</sup> [REDACTED].<sup>819</sup>

<sup>808</sup> [REDACTED]; [P02858](#), p.3, 14.

<sup>809</sup> Cross-reference AnnexA, AnnexE.1, AnnexE.2: [REDACTED], Srdan GOLUBOVIĆ aka MAX<sub>(DB)</sub>, and [REDACTED].

<sup>810</sup> See [REDACTED].

<sup>811</sup> [REDACTED].

<sup>812</sup> [REDACTED]; [P00852](#), p.13-14.

<sup>813</sup> [REDACTED]; [P00852](#), p.13-14; [P02326](#). [REDACTED], see e.g. [REDACTED]; [P02358](#), p.9; [P02859](#), p.1; [P02570](#), p.3.

<sup>814</sup> Cross-reference Section [II.F.5\(b\)\(ii\)b](#); Section [II.F.5\(b\)\(iii\)a](#); Section [II.F.5\(b\)\(iv\)b](#). [REDACTED]; THEUNENSReynaud:T.49-50(13-Mar-2018); [REDACTED].

<sup>815</sup> [REDACTED].

<sup>816</sup> [REDACTED].

<sup>817</sup> Cross-reference Section [II.F.5\(b\)\(ii\)b](#).

<sup>818</sup> [REDACTED]; [P02326](#); [REDACTED].

<sup>819</sup> [REDACTED] [REDACTED]: compare [REDACTED]; [P02326](#), p.1 with [P00859](#), p.21; [P02863](#), p.25; [P00160](#), p.50; [P00233](#), p.11. See [P02598](#), p.51; [P02834](#), p.53.



- The SerbianDB [REDACTED].<sup>820</sup> Members of the SDG did not receive regular salaries, [REDACTED].<sup>821</sup> [REDACTED].<sup>822</sup> [REDACTED].<sup>823</sup> Any doubt that the payments to the SDG were from the SerbianDB is dispelled by the appearance of known SDG members on the SerbianDB's JATD paylists from [REDACTED] to 1995.<sup>824</sup>
- The SerbianDB provided health and death benefits to SDG members, including during their ARK deployment.<sup>825</sup> [REDACTED].<sup>826</sup>

(vi) The nexus between the SDG and the Unit demonstrates the SerbianDB's authority over the SDG

180. From the beginning of the conflict, the relationship between the SDG and the Unit "was as close as it [could] be":<sup>827</sup> [REDACTED].<sup>828</sup> In light of the Accused's exclusive authority and control over the Unit,<sup>829</sup> the commonalities and close cooperation between the SDG and the Unit establish that the SDG was also a SerbianDB unit operating under the Accused's authority.

181. The SDG and the Unit were similarly equipped. Both had SMUP vehicles, equipped with SMUP and SAO-KrajinaMUP license plates,<sup>830</sup> which was typical of the SerbianDB: [REDACTED].<sup>831</sup> The SDG was armed similarly to the Unit, with better equipment and more modern weaponry than other military units.<sup>832</sup> The SDG and the Unit had SMUP identification cards.<sup>833</sup> In addition, both the SDG and the Unit were uniquely protected by the SerbianDB, giving them leverage and influence over local

<sup>820</sup> [REDACTED].

<sup>821</sup> [REDACTED].

<sup>822</sup> [REDACTED].

<sup>823</sup> [REDACTED].

<sup>824</sup> AnnexE.2.

<sup>825</sup> Cross-reference Section [II.F.5\(b\)\(iv\)b](#).

<sup>826</sup> [2D00160](#), p.2; [REDACTED].

<sup>827</sup> [REDACTED].

<sup>828</sup> [REDACTED].

<sup>829</sup> Cross-reference Section [II.D.2\(a\)](#).

<sup>830</sup> [P02315](#), p.2; [REDACTED]; [P00852](#), p.13-14; NOVAKOVIĆStojan:T.48-49(6-Oct-2020); [1D00407](#), p.6; [REDACTED].

<sup>831</sup> [REDACTED].

<sup>832</sup> [REDACTED]; [P00486](#), p.2-4; [P01974](#), p.1-2; THEUNENSReynaud:T.45(7-Mar-2018); ANASTASIJEVIĆDejan:[P02423](#), para.90-91.

<sup>833</sup> [P01974](#), p.1-2; THEUNENSReynaud:T.45(7-Mar-2018); [REDACTED]. Cross-reference Section [II.D.2\(a\)\(ii\)](#).

police in Serbia and the Serb-held territories in Croatia and BiH alike, from 1991 through the end of 1995.<sup>834</sup>

182. The SDG's deployment in a number of operations, jointly with the Unit or coordinated by Unit members, further demonstrates the Accused's control over them. The first was in Brčko in 1992, which featured the SDG as a "crack unit" in the takeover, complemented by the Unit, which committed crimes after the takeover was complete.<sup>835</sup> From November 1994 until the conflict was over, the SDG and the Unit were deployed together constantly:

- [REDACTED].<sup>836</sup>
- In June-July 1995, veteran Unit member MIJOVIĆ<sub>(DB)</sub> led another SDG group, Scorpions, and Unit members, in operations in Trnovo/Treskavica, [REDACTED].<sup>837</sup>
- In September-October 1995, SIMATOVIĆ's deputy FILIPOVIĆ<sub>(DB)</sub> coordinated the SDG and the Unit under BOŽOVIĆ<sub>(DB)</sub> in operations in the ARK region, during which the SDG massacred two groups of non-Serb civilians in Sanski Most.<sup>838</sup>
- In October 1995, FILIPOVIĆ<sub>(DB)</sub> and BOŽOVIĆ<sub>(DB)</sub> again coordinated the SDG and several contingents of the Unit in operations across SBWS to retain Serb territory.<sup>839</sup>

183. For each of these operations, the Accused financed, equipped, armed and provided other support to the SDG, and SIMATOVIĆ was personally in communication with ARKAN or Unit members coordinating with the SDG.<sup>840</sup>

184. [REDACTED],<sup>841</sup> [REDACTED],<sup>842</sup> [REDACTED]<sup>843</sup> [REDACTED].<sup>844</sup> [REDACTED],<sup>845</sup> [REDACTED].<sup>846</sup>

<sup>834</sup> [REDACTED]; [1D00702](#), p.3; [REDACTED].

<sup>835</sup> [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.99. Cross-reference Section [II.F.4\(b\)\(ii\)b](#).

<sup>836</sup> Cross-reference Section [II.F.5\(b\)\(ii\)b](#).

<sup>837</sup> Cross-reference Section [II.F.5\(b\)\(iii\)a](#).

<sup>838</sup> Cross-reference Section [II.F.5\(b\)\(iv\)a-b](#).

<sup>839</sup> Cross-reference Section [II.F.5\(b\)\(v\)](#).

<sup>840</sup> Cross-reference Section [II.F.5\(b\)\(ii\)a-b](#) (Pauk); Section [II.F.5\(b\)\(iii\)a](#) (Trnovo); Section [II.F.5\(b\)\(iv\)b](#) (ARK); Section [II.F.5\(b\)\(v\)](#) (SBWS).

185. So close was the relationship between the SerbianDB and ARKAN's unit, that once the conflict was over and the Unit formalised as the JSO, the Accused gave LEGIJA<sub>(DB)</sub> **SIMATOVIĆ**'s role as its Commander<sup>847</sup> and brought SDG members into the JSO.<sup>848</sup>

(c) **STANIŠIĆ** and **SIMATOVIĆ** exercised authority over and responsibility for the Scorpions

186. The Scorpions were under the SMUP's control, at times acting directly at the behest of **STANIŠIĆ**, **SIMATOVIĆ**, or their subordinates, and other times in coordination with their SMUP colleague and co-JCE member BADŽA.<sup>849</sup> Scorpions' commander, Slobodan MEDIĆ aka BOCA<sub>(DB)</sub>, told Scorpions members that the unit was a satellite unit of the Unit, and had been established as a SerbianDB unit at a meeting in Novi Sad in 1993, whose attendees included Milan MILANOVIĆ aka MRGUD<sub>(DB)</sub>, BOCA<sub>(DB)</sub>, KERTES, BADŽA, and BOŽOVIĆ<sub>(DB)</sub>.<sup>850</sup> BOCA<sub>(DB)</sub>'s unit was renamed the "Scorpions" at this meeting and brought under the SMUP's patronage and control.<sup>851</sup> A senior Scorpions member who trained and selected soldiers for their elite reconnaissance platoon<sup>852</sup> testified that the Scorpions were a satellite unit of the "Red Berets", one of the special units of the SerbianDB.<sup>853</sup> The Scorpions' insignia was identical to the Unit's, but for the word "*Skorpion*" inscribed beneath.<sup>854</sup>

187. BOCA<sub>(DB)</sub> received orders from, and reported directly to, the Accused, including during meetings in Belgrade where he was accompanied by MRGUD<sub>(DB)</sub>, his immediate

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<sup>841</sup> [REDACTED].  
<sup>842</sup> Indictment, para.56-57.  
<sup>843</sup> [REDACTED].  
<sup>844</sup> [REDACTED].  
<sup>845</sup> [REDACTED].  
<sup>846</sup> [REDACTED]. See [P03137](#); [P03071](#); [P03842](#); [REDACTED]. Compare with [REDACTED].  
<sup>847</sup> [REDACTED]; [P00256](#)(00:01:53-00:02:31)(00:05:56-00:06:18), p.2-3.  
<sup>848</sup> STOPARIĆGoran:[P00796](#), para.70; VASILJEVIĆAleksandar:T.26-27,30-31(31-Jan-2019); [REDACTED]; [P02858](#); [P02862](#); [REDACTED].  
<sup>849</sup> THEUNENSReynaud:T.53(6-Mar-2018); STOPARIĆGoran:T.62-63,66(8-Nov-2017); STOPARIĆGoran:T.5(9-Nov-2017); [REDACTED]; [P03270](#), p.4,7; [P00849](#), p.2; NIELSENChristian:T.60-61(15-Nov-2017).  
<sup>850</sup> STOPARIĆGoran:T.41-42(7-Nov-2017); STOPARIĆGoran:T.25,28(30-Nov-2017); STOPARIĆGoran:[P00796](#), para.69; [REDACTED].  
<sup>851</sup> [REDACTED]; STOPARIĆGoran:[P00796](#), para.69-70; STOPARIĆGoran:T.25(30-Nov-2017); [REDACTED]; STOPARIĆGoran:T.66(8-Nov-2017).  
<sup>852</sup> STOPARIĆGoran:[P00796](#), para.74. See also [REDACTED] [P00805](#); [REDACTED].  
<sup>853</sup> STOPARIĆGoran:[P00796](#), para.69-70; [REDACTED].  
<sup>854</sup> [P02413](#); [REDACTED]; STOPARIĆGoran:[P00796](#), para.71; STOPARIĆGoran:T.42-44(7-Nov-2017); [P00812](#); [P00813](#); [P00814](#).

superior and an “indisputable collaborator of the DB”<sup>855</sup>—[REDACTED].<sup>856</sup> The Accused also conveyed orders to BOCA<sub>(DB)</sub> through MRGUD<sub>(DB)</sub>.<sup>857</sup> MRGUD<sub>(DB)</sub> travelled to Belgrade to receive his instructions from the SMUP, including from BADŽA.<sup>858</sup>

188. Although the Scorpions were officially designated as part of the SVK, General LONČAR, SVK 11<sup>th</sup> Corps Commander—which covered the area where the Scorpions were located—did not have any real command authority over them.<sup>859</sup> When the SVK required assistance from the Scorpions, it was arranged through MRGUD<sub>(DB)</sub>, with the SerbianDB deciding on the particulars of the Scorpions’ deployments.<sup>860</sup>

189. **SIMATOVIĆ** and other SerbianDB operatives regularly visited the Scorpions at their base in Đeletovci to brief BOCA<sub>(DB)</sub> and deliver any equipment they needed.<sup>861</sup> **STANIŠIĆ** also met with the Scorpions in Đeletovci.<sup>862</sup> [REDACTED].<sup>863</sup> [REDACTED].<sup>864</sup> In addition to equipping, arming, training and instructing the Scorpions, the SerbianDB also provided them with a salary, paid in freshly printed dinars with sequential serial numbers.<sup>865</sup> When STOPARIĆ joined the unit, 25-30% of the Scorpions had been trained in “FRENKI’s Red Berets” camps, with several trained by Captain DRAGAN<sub>(DB)</sub> and BOŽOVIĆ<sub>(DB)</sub>.<sup>866</sup>

190. BOCA<sub>(DB)</sub> was ordered “from the top” to ensure that no more than 40% of the Scorpions were from Serbia, allowing Belgrade to claim that the Scorpions were special forces of the RS and RSK, and the members from Serbia were merely volunteers.<sup>867</sup>

<sup>855</sup> STOPARIĆGoran:[P00796](#), para.82; STOPARIĆGoran:T.62-63(8-Nov-2017); [REDACTED]; [P00815](#), p.1-2.

<sup>856</sup> STOPARIĆGoran:[P00796](#), para.82; STOPARIĆGoran:T.5(9-Nov-2017); [REDACTED]. *Cross-reference* Section [II.E.4\(b\)\(iii\)](#). [REDACTED] *See also* STOPARIĆGoran:[P00796](#), para.89; [P00818](#), p.4; [REDACTED].

<sup>857</sup> [REDACTED]; STOPARIĆGoran:T.62-63,66(8-Nov-2017).

<sup>858</sup> [REDACTED].

<sup>859</sup> STOPARIĆGoran:T.50-51(7-Nov-2017); STOPARIĆGoran:[P00796](#), para.80.

<sup>860</sup> STOPARIĆGoran:T.66-67(30-Nov-2017); STOPARIĆGoran:T.49-51(7-Nov-2017); STOPARIĆGoran:[P00796](#), para.80-81; [REDACTED]; [P00815](#), p.1-2. *See* [REDACTED]; [P02891](#), p.5-6; MILOVANOVIĆManojlo:[P02935](#), T.15550-15553.

<sup>861</sup> [P00818](#), p.4; STOPARIĆGoran:[P00796](#), para.73; STOPARIĆGoran:[P00797](#), para.73; [REDACTED].

<sup>862</sup> [REDACTED]; RFJ-144:T.22(24-Jan-2018).

<sup>863</sup> [REDACTED].

<sup>864</sup> [REDACTED].

<sup>865</sup> STOPARIĆGoran:[P00796](#), para.73-74,78; [REDACTED]; STOPARIĆGoran:T.59-60(7-Nov-2017); STOPARIĆGoran:T.24(9-Nov-2017); [REDACTED].

<sup>866</sup> [REDACTED]; STOPARIĆGoran:T.63-64(7-Nov-2017).

<sup>867</sup> STOPARIĆGoran:[P00796](#), para.76; [REDACTED]; STOPARIĆGoran:T.44-45(7-Nov-2017).

191. The Accused demonstrated that the Scorpions were one of their special units by deploying them in successive operations with the other SerbianDB units, always under the command of Unit or SDG members, in 1994-1995, as developed below: in Operation Pauk,<sup>868</sup> Trnovo/Treskavica—during which they murdered Muslim men and boys captured around Srebrenica,<sup>869</sup> [REDACTED].<sup>870</sup>

192. As a final confirmation of the Accused's authority over the Scorpions and affirmation of their crimes, when the Scorpions disbanded at the end of the conflict, members who were recommended by BOCA<sub>(DB)</sub> received [REDACTED]<sup>871</sup>—[REDACTED].<sup>872</sup>

**E. The Accused significantly contributed to the CCP by employing informal and extra-legal networks and structures, and by arming and training Serb Forces that implemented it**

193. To facilitate their ability to advance the CCP, the Accused manipulated Federal and Serbian institutions and structures through informal but powerful lines of control that stretched from MILOŠEVIĆ, through both Accused, and into Serb political and military leadership on the ground outside of Serbia. Acting as channels of authority and communication in these informal lines, the Accused helped create the conditions for implementation of the CCP. In addition, the Accused played leading roles in advancing the CCP by coordinating and implementing a massive arming and training scheme, contributing significantly to the establishment of Serb Forces in Croatia and BiH that implemented the CCP.

**1. The Accused and MILOŠEVIĆ manipulated Federal and Serbian bodies to facilitate implementation of the CCP**

194. The Serbian Constitution adopted in 1990 centralised power in MILOŠEVIĆ,<sup>873</sup> positioning him to advance his nationalist agenda through the Serbian structures he

<sup>868</sup> Cross-reference Section [II.F.5\(b\)\(ii\)b](#).

<sup>869</sup> Indictment, para.61. Cross-reference Section [II.F.5\(b\)\(iii\)a](#); Section [III.C.5](#).

<sup>870</sup> Cross-reference Section [II.F.5\(b\)\(v\)](#).

<sup>871</sup> E.g. [REDACTED].

<sup>872</sup> [REDACTED].

<sup>873</sup> DONIARobert:P01600, p.13. See DONIARobert:T.13(30-Jan-2018); ROBERTSIvor:T.11-13,71,75(15-Oct-2019); ROBERTSIvor:1D00430, para.60; [REDACTED].

controlled.<sup>874</sup> However, prior to 1992 Serbia was just one of SFRY's six constituent republics.<sup>875</sup> To extend his authority beyond his *de jure* limitations as a republican president, MILOŠEVIĆ positioned the Accused, SMUP, SerbianDB, and other Belgrade JCE members to exert influence and control over key federal functions—armed forces and security/intelligence—to create the conditions needed to implement the CCP outside Serbia.<sup>876</sup>

195. MILOŠEVIĆ's strategy was to utilise the SMUP as a central vehicle to project his influence and advance the CCP outside Serbia. This strategy was reflected in his March 1991 announcement on the formation of Serbian police units to protect Serbs outside of Serbia.<sup>877</sup> The elevation of Serbian police (an entity over which MILOŠEVIĆ exercised total control)<sup>878</sup> as a vehicle for implementing his objectives in Croatia and BiH coincided with early distrust of the multi-ethnic JNA as insufficiently Serbian.<sup>879</sup>

196. The Accused played central roles in this process from the beginning. For example, shortly after MILOŠEVIĆ's March 1991 announcement, **SIMATOVIĆ** arrived in Krajina to organise police training at Golubić.<sup>880</sup>

197. MILOŠEVIĆ, working closely with the Accused, utilised the following strategies to create conditions for efficiently pursuing the CCP:

- Vojna linija ("military line"): MILOŠEVIĆ cultivated an informal network of loyal individuals in the SMUP—most notably both Accused—and federal bodies who worked outside of their lawful authority to pursue the CCP in Croatia during latter 1991, deploying paramilitaries and coordinating with like-minded JNA commanders.
- "Parallel structure" in Krajina: MILOŠEVIĆ, through **STANIŠIĆ**, **SIMATOVIĆ**, and the SerbianDB, determined policy, made key police and military appointments, established Serb forces, and pursued the CCP through Krajina officials.

<sup>874</sup> ROBERTSIvor:T.10-11(15-Oct-2019); MILOŠEVIĆMilan:2D00451, para.72.

<sup>875</sup> See AF12.

<sup>876</sup> ANASTASIJEVIĆDejan:P02423, para.27,43 .

<sup>877</sup> P02439; ANASTASIJEVIĆDejan:P02423, para.20; ANASTASIJEVIĆDejan:T.11-12(13-Jun-2018).

<sup>878</sup> ROBERTSIvor:T.40(15-Oct-2019).

- Transforming the JNA into a Serb army: MILOŠEVIĆ worked with other JCE members to transform the JNA—a federal, multi-ethnic military that played a buffer role early in the conflict in Croatia—into a Serb army that implemented the CCP with other Serb Forces in Krajina, SBWS, and BiH.
- Ethnic homogenisation of the SerbianDB: Under MILOŠEVIĆ and BOGDANOVIĆ, the SerbianDB was transformed from a multi-ethnic service into a politicised Serb entity where STANIŠIĆ thrived carrying out MILOŠEVIĆ's policies.
- Centralisation of intelligence in the SerbianDB: STANIŠIĆ and MILOŠEVIĆ led the SerbianDB in taking over intelligence and security functions previously handled by autonomous provinces and federal bodies, making it the pre-eminent security entity.

(a) Vojna linija

198. General Aleksandar VASILJEVIĆ, head of the JNA's Security Administration, used the term *vojna linija*<sup>881</sup> to describe an informal network of SMUP officials and other leading personages who engaged in activities beyond the scope of their lawful duties, related to the formation and deployment of paramilitary units to the theatre of war.<sup>882</sup> In effect, the *vojna linija* was an informal power structure with MILOŠEVIĆ at its apex, through which he, the Accused, and others he empowered exercised authority to advance the CCP.<sup>883</sup>

199. JCE members who were officials of or associated with the SMUP or SerbianDB and part of the *vojna linija* included STANIŠIĆ, SIMATOVIĆ, BADŽA, KERTES, and BOGDANOVIĆ—and STANIŠIĆ was first and foremost.<sup>884</sup> SerbianDB officials Dragan FILIPOVIĆ<sub>(DB)</sub> and Milan TEPAVČEVIĆ were also a part of the *vojna linija*, and worked at the Accused's behest to advance the CCP throughout the Indictment

<sup>879</sup> ANASTASIJEVIĆDejan:P02423, para.20; ANASTASIJEVIĆDejan:T.11-13(13-Jun-2018); P02439.

<sup>880</sup> BABIĆMilan:P01246, T.13106,13118-13119. Cross-reference Section II.E.4(a).

<sup>881</sup> VASILJEVIĆAleksandar:T.5(28-Jan-2019).

<sup>882</sup> VASILJEVIĆAleksandar:P02685, T.15884-15885; [REDACTED].

<sup>883</sup> ANASTASIJEVIĆDejan:P02423, para.35-36.

<sup>884</sup> VASILJEVIĆAleksandar:P02686, T.15885-15886; [REDACTED]; VASILJEVIĆAleksandar:T.18-19(5-Feb-2019); ANASTASIJEVIĆDejan:P02423, para.38,40; ANASTASIJEVIĆDejan:T.70(21-Jun-2018); P00059, p.9-10; P00852, p.6. See also ROBERTSIvor:T.19(15-Oct-2019); [REDACTED].



period.<sup>885</sup> They collaborated on the military side with JNA generals Nedeljko BOŠKOVIĆ, Andrija BIORČEVIĆ, Boro IVANOVIĆ, Života PANIĆ, and Dragoljub ARANĐELOVIĆ—whose involvement is detailed elsewhere—to implement the CCP in Croatia in late 1991.<sup>886</sup>

200. The SerbianDB’s specialisation in covert activities made it the ideal organ for coordinating the collaboration between the JNA and SMUP-backed police and paramilitaries (such as the Unit and ARKAN’s SDG) in operations outside of Serbia,<sup>887</sup> which were illegal under SFRY law.<sup>888</sup>

201. The *vojna linija* was evident in:

- BADŽA’s deployment to Slavonia as a high-ranking official of the SMUP, being “given the task of doing something that was not [the] MUP’s job. And after that, he was to be appointed to a top echelon post in the MUP of Serbia”.<sup>889</sup>
- KERTES’s role in the “organized effort” to break up the military and calls to purge the JNA of non-Serbs, as KADIJEVIĆ reported to the SFRY Presidency on 28 September 1991:

The military security agency has been unable to grasp where this is coming from. Probably from one central location. Mihalj [KERTES] is in frequent contact with certain people in the JNA through whom this trend is intensifying.<sup>890</sup>

- The direct participation of **STANIŠIĆ**, BADŽA, and Unit members in coordinating paramilitaries with *vojna linija* counterparts Generals PANIĆ and ARANĐELOVIĆ in SBWS;<sup>891</sup> and

<sup>885</sup> VASILJEVIĆAleksandar:[P02686](#), T.15885-15886; VASILJEVIĆAleksandar:T.18-19(5-Feb-2019). *Cross-reference* AnnexA: FILIPOVIĆ<sub>(DB)</sub>; TEPAVČEVIĆ<sub>(DB)</sub>.

<sup>886</sup> [REDACTED]; VASILJEVIĆAleksandar:[P02689](#). *Cross-reference* Section [II.E.1\(a\)](#); Section [II.F.2\(c\)](#)-(f); Section [II.F.2\(h\)\(iii\)](#); Section [II.F.4\(b\)\(i\)b.iii](#); Section [II.F.4\(b\)\(iv\)](#); Section [II.F.5\(a\)\(i\)](#); Section [III.B.2\(b\)\(iv\)](#).

<sup>887</sup> *Cross-reference* Section [II.B.3\(b\)](#). See ANASTASIJEVIĆDejan:T.26,29-31(13-Jun-2018).

<sup>888</sup> ANASTASIJEVIĆDejan:[P02423](#), para.37; MILOŠEVIĆMilan:T.20-24(25-Feb-2020); MILOŠEVIĆMilan:T.8-9(26-Feb-2020).

<sup>889</sup> VASILJEVIĆAleksandar:[P02700](#), T.16062-16064; VASILJEVIĆAleksandar:T.29-30(6-Feb-2019); [REDACTED].

<sup>890</sup> [P02929](#), p.2-3.

<sup>891</sup> [REDACTED]; VASILJEVIĆAleksandar:T.17,48(5-Feb-2019); VASILJEVIĆAleksandar:[P02689](#), T.15890-15891; VASILJEVIĆAleksandar:T.38-39(30-Jan-2019). *Cross-reference* Section [II.F.2](#).

- ARKAN's joint ethnic cleansing operations with units commanded by JNA Generals BIORČEVIĆ and IVANOVIĆ.<sup>892</sup>
- STANIŠIĆ's involvement in appointing SBWS TO personnel.<sup>893</sup>

202. Using, *inter alia*, the *vojna linija*, MILOŠEVIĆ gained *de facto* control over federal institutions such as the JNA in 1992.<sup>894</sup> By this stage in the conflicts in Croatia and BiH, and with his power-grab in Serbia and the FRY complete, the *vojna linija* had served its purpose.<sup>895</sup>

(b) "Parallel Structure"

203. MILOŠEVIĆ, STANIŠIĆ, and SIMATOVIĆ formed what BABIĆ called a "parallel structure" in Krajina by August 1990.<sup>896</sup> Mirroring the *vojna linija*, the "parallel structure" was a line of power and authority running parallel to the Krajina authorities.<sup>897</sup> The Krajina "parallel structure" had both a military and political aspect, both of which answered to MILOŠEVIĆ.<sup>898</sup> MILOŠEVIĆ controlled Krajina: along the political line that ran from him through the Accused and SerbianDB to the Krajina political and police structures;<sup>899</sup> and along the military line through the SFRY Presidency,<sup>900</sup> to the SAO-Krajina TO units and commanders.

204. Mirroring the *vojna linija*, STANIŠIĆ was the head of authority figures within the "parallel structure", with SIMATOVIĆ functioning as his deputy.<sup>901</sup> Others in the

<sup>892</sup> [REDACTED]; VASILJEVIĆAleksandar:T.50-54(29-Jan-2019); NOVAKOVIĆStojan:T.33-34(6-Oct-2020); [ID00745](#), p.1; NOVAKOVIĆStojan:T.12(7-Oct-2020). *Cross-reference* Section [II.F.2](#); Section [III.B.2](#).

<sup>893</sup> VASILJEVIĆAleksandar:T.50-51(30-Jan-2019); VASILJEVIĆAleksandar:T.7(6-Feb-2019); VASILJEVIĆAleksandar:T.17(5-Feb-2019).

<sup>894</sup> ANASTASIJEVIĆDejan:[P02423](#), para.43-44.

<sup>895</sup> ANASTASIJEVIĆDejan:[P02423](#), para.44; ANASTASIJEVIĆDejan:T.24(13-Jun-2018).

<sup>896</sup> BABIĆMilan:[P01246](#), T.12918,13129,13490,13927; [REDACTED]; BABIĆMilan:[P01248](#), T.1390-1391,1567-1568; ANASTASIJEVIĆDejan:[P02423](#), para.29.

<sup>897</sup> [REDACTED].

<sup>898</sup> BABIĆMilan:[P01246](#), T.13927.

<sup>899</sup> BABIĆMilan:[P01246](#), T.13129-13132.

<sup>900</sup> MILOŠEVIĆ controlled the co-called Yugoslavia Rump Presidency from summer 1991. Rump Presidency members KOSTIĆ and JOVIĆ considered MILOŠEVIĆ to be their chief.

<sup>901</sup> BABIĆMilan:[P01246](#), T.12918; [REDACTED].

“parallel structure” were JCE members BOGDANOVIĆ and MARTIĆ, and the Accused’s SerbianDB associate Captain DRAGAN<sub>(DB)</sub>, and Dragan FILIPOVIĆ<sub>(DB)</sub>.<sup>902</sup>

205. Starting from August 1990, the “parallel structure” played an important role in establishing the conditions for the Accused and other Belgrade JCE members to efficiently pursue the CCP. In the following years this “line of command” was not subordinated to the Krajina government authorities.<sup>903</sup> Through the “parallel structure”, the Accused and MILOŠEVIĆ controlled the mandate and actions of SAO-Krajina police and paramilitary/volunteer forces in Serb municipalities.<sup>904</sup>

206. The appointment of TO commanders was also decided by the military authorities in Belgrade, influenced by the “parallel structure”.<sup>905</sup> Later, officials—including municipal presidents, such as ZEČEVIĆ from Benkovac (president from November 1991 to February 1992)—were part of the structure.<sup>906</sup> BABIĆ also identified Nešo MANDINIĆ<sub>(DB)</sub> and Dušan ORLOVIĆ<sub>(DB)</sub> as part of the parallel structure,<sup>907</sup> which is confirmed by evidence that both were involved with MARTIĆ and ARKAN in arms shipments from Belgrade during 1990 to 1991.<sup>908</sup>

207. Through the parallel structure, the Accused and MILOŠEVIĆ manufactured incidents in late 1990 through early 1991 to provoke fear among the Serbs and to draw the JNA into the conflict.<sup>909</sup> Attempts to negotiate a peaceful solution between the Croatian government and the SDS were vehemently opposed by the “parallel structure” (STANIŠIĆ, MARTIĆ, *et al.*).<sup>910</sup> It bears noting that when the Krajina Serbs first declared autonomy in July 1990,<sup>911</sup> their vision encompassed Serbian regional autonomy

<sup>902</sup> BABIĆMilan:[P01246](#), T.12918-12920,13527; BABIĆMilan:[P01248](#), T.1391-1392; [REDACTED]; VASILJEVIĆAleksandar:[P02695](#), T.15867-15868(Based on meetings with them in February and April 1992, VASILJEVIĆ concluded that MARTIĆ was STANIŠIĆ’s subordinate.); [REDACTED].

<sup>903</sup> BABIĆMilan:[P01246](#), T.13129; BABIĆMilan:[P01248](#), T.1390-1391,1567-1568.

<sup>904</sup> BABIĆMilan:[P01246](#), T.12918-12920,13383,13391,13401; [P01964](#); [P03722](#), p.3; [P03082](#); [REDACTED]; RFJ-066:T.10(13-Jul-2017).

<sup>905</sup> BABIĆMilan:[P01246](#), T.13187-13189,13730-13731; [P00033](#); [P01530](#); [P01395](#); [P01397](#); [P01334](#); [P01340/P01300](#)(duplicates); [P01345](#); [P01347](#); [P01370](#); [P01372](#); [P01349](#); [P01371](#); [P01356](#); [P01390](#); [P01357](#); [P00036](#); [P00035](#); [P01358](#); [P01392](#); [P01335](#); [P01353](#); [P01359](#); [P01350](#); [P01352](#).

<sup>906</sup> BABIĆMilan:[P01246](#), T.12918-12920,13401.

<sup>907</sup> BABIĆMilan:[P01246](#), T.13492. *See also* [REDACTED].

<sup>908</sup> [P00384](#), p.2; [P03857](#); NOVAKOVIĆStojan:T.15(6-Oct-2020); NOVAKOVIĆStojan:T.4-5(8-Oct-2020).

<sup>909</sup> *Cross reference* Section [II.E.1\(b\)](#).

<sup>910</sup> BABIĆMilan:[P01246](#), T.12934-12936. *See* BABIĆMilan:[P01248](#), T.1387-1388; [P01383](#).

<sup>911</sup> [P01571](#); [P01269](#); BABIĆMilan:[P01560](#), para.10; BOSNIĆMile:T.67-68(22-Aug-2019).

pursuant to the Croatian constitution, with local control of civic and cultural life.<sup>912</sup> Those working through the parallel structures ensured that this did not come to pass.

208. The “parallel structure” persisted in RSK throughout the Indictment period, for example:

- MILOŠEVIĆ—as opposed to the Croatian Serb leadership— replaced BABIĆ with HADŽIĆ in early 1992 over disagreement about the Vance Plan.<sup>913</sup>
- At STANIŠIĆ’s instruction, RSK police deployed from across RSK to Belgrade in March 1992 to provide security during anti-MILOŠEVIĆ demonstrations.<sup>914</sup> Local RSK authorities vehemently objected to the deployment, which was approved by RSK officials subservient to MILOŠEVIĆ.<sup>915</sup>
- In latter 1994, the Chief of the RSK-DB reported secretly and directly to STANIŠIĆ when MARTIĆ did not act in accordance with their agenda.<sup>916</sup>

(c) Transformation of the JNA

209. The JNA intervened as a buffer between the Serb and Croat police in early conflicts, such as in Pakrac and Plitvice in March 1991.<sup>917</sup> Not coincidentally, that same month MILOŠEVIĆ expressed his distrust of the multi-ethnic JNA, announcing the establishment of Serbian police units to protect Serbs outside Serbia.<sup>918</sup> The establishment of these police units coincided with the process of transforming the JNA into a Serb army that engaged in joint operations with police and other Serb Forces in implementing the CCP.

210. This transition was reflected in joint operations of JNA forces under MLADIĆ with local TO and SAO-Krajina police in Krajina in latter 1991.<sup>919</sup> In SBWS, the JNA’s

<sup>912</sup> [P01269](#), p.2; BABIĆMilan:[P01560](#), para.10.

<sup>913</sup> [REDACTED].

<sup>914</sup> [REDACTED]; RFJ-066:T.39-40,46-51(11-Jul-2017); [REDACTED]; [P03768](#); BOSNIĆMile:T.48-50(21-Aug-2019); [2D00498](#); [P03051](#), p.2. *See also* [1D00061](#), p.19-20,31; [REDACTED].

<sup>915</sup> [P03768](#); BOSNIĆMile:T.48-50(21-Aug-2019).

<sup>916</sup> [P03818](#); DRAČAAco:T.16-18(3-Dec-2019). *See* [P00222](#), p.3-4.

<sup>917</sup> DONIARobert:[P01600](#), p.18-19. *Cross-reference* Section [II.E.1\(c\)](#).

<sup>918</sup> [P02439](#); ANASTASIJEVIĆDejan:[P02423](#), para.20; ANASTASIJEVIĆDejan:T.11-13(13-Jun-2018).

<sup>919</sup> *Cross-reference* Section [II.F.1](#).

transformation was evidence in joint operations of the JNA (under BIORČEVIĆ) and ARKAN's SDG via the *vojna linija*.<sup>920</sup>

211. SFRY Presidency member JOVIĆ's notes of events and meetings with MILOŠEVIĆ and KADIJEVIĆ during mid- to latter-1991 chronicle the evolution of the JNA as JCE members at the highest level co-opted it as a Serb army:<sup>921</sup>

- 5 July 1991: After discussion of opposition calls to establish a Serb army, MILOŠEVIĆ and JOVIĆ demanded that KADIJEVIĆ deploy the JNA to cover all the areas in Croatia where Serbs lived. They also demanded that, "Croats and Slovenes must be completely eliminated from the military".<sup>922</sup>
- 12 July 1991: JOVIĆ observed that the US Administration was concerned about the widespread replacement of non-Serb officers with Serbs and the buildup of territorial defence forces in areas of Croatia where the Serb population was dominant.<sup>923</sup>
- 30 July 1991: KADIJEVIĆ reported his "position and final orientation" to MILOŠEVIĆ and JOVIĆ that the JNA should be transformed into a military force of those who wanted to remain in Yugoslavia, comprising at least Serbia, the "Serb nation", plus Montenegro.<sup>924</sup> This meeting occurred on the eve of the first JNA operation in the area of Erdut/Dalj in SBWS.<sup>925</sup>
- 24 September 1991: After MILOŠEVIĆ directed KADIJEVIĆ to remove 2000 non-Serb officers, KADIJEVIĆ concluded that Serbia and Montenegro should declare that the military was theirs and assume command, financing the war and "everything else."<sup>926</sup>
- 28 September 1991: KADIJEVIĆ reported that all Serb regions in Croatia had been "liberated."

<sup>920</sup> Cross-reference Section [II.F.2](#); NOVAKOVIĆStojan:T.33-34(6-Oct-2020). Cross-reference Section [II.F.2](#).

<sup>921</sup> See generally [P03102](#).

<sup>922</sup> [P02921](#), p.2-3. See ANASTASIJEVIĆDejan:[P02423](#), para.44-45; [P02426](#); ANASTASIJEVIĆDejan:T.16-18(13-Jun-2018).

<sup>923</sup> [P02923](#), p.3. See also THEUNENSReynaud:[P01980](#), p.124-125.

<sup>924</sup> [P02924](#), p.2.

<sup>925</sup> RFJ-113:T.53-54(26-Sep-2017).

<sup>926</sup> [P02928](#), p.2.

212. JOVIĆ's comments to the Serbian Assembly on 26 September 1991 corroborate his notes. He declared the JNA "a very powerful force that can protect the Serbian people in Croatia", and assured that "significant transformations of the JNA are under way".<sup>927</sup>

213. The final transformation of the JNA into a Serb army was completed on 8 May 1992 through a purge of JNA generals who were either non-Serbs or considered too pro-Yugoslav, including VASILJEVIĆ and his Macedonian Deputy TUMANOV.<sup>928</sup> This was accompanied by the promotion of generals associated with the *vojna linija*. PANIĆ was elevated to Chief of the VJ Main Staff.<sup>929</sup> BOŠKOVIĆ was officially reactivated on 8 May 1992,<sup>930</sup> then promoted to the rank of general and appointed chief of VJ intelligence,<sup>931</sup> using LEGIJA<sub>(DB)</sub> as his bodyguard.<sup>932</sup> BOŠKOVIĆ was to ensure that the military intelligence would be placed under STANIŠIĆ and the SerbianDB.<sup>933</sup>

(d) Ethnic homogenisation of the SerbianDB

214. Prior to MILOŠEVIĆ's 1990 election, the SerbianDB was a multi-ethnic organisation.<sup>934</sup> MILOŠEVIĆ distrusted this SerbianDB and attempted to politicise it.<sup>935</sup> Under BOGDANOVIĆ, the "national issue" exerted great influence and many SerbianDB employees left.<sup>936</sup> The result was a more mono-ethnic SerbianDB,<sup>937</sup> in which STANIŠIĆ and SIMATOVIĆ flourished throughout the Indictment period.

(e) Centralisation of intelligence structures within the SerbianDB

215. Between 1990 and 1992, STANIŠIĆ aided MILOŠEVIĆ in centralising intelligence functions within the SerbianDB, achieving what STANIŠIĆ envisaged: the SerbianDB as the *only* security service.<sup>938</sup> To exploit already weakened SFRY institutions, STANIŠIĆ and MILOŠEVIĆ subverted the FSUP's supremacy over its

<sup>927</sup> [P02444](#), p.49-51; ANASTASIJEVIĆDejan:T.20-21(13-Jun-2018).

<sup>928</sup> [P02442](#), p.1-9; ROBERTSIvor:T.14(15-Oct-2019).

<sup>929</sup> [P02442](#), p.2,7. See also [P02969](#), p.1.

<sup>930</sup> VASILJEVIĆAleksandar:T.47-48(30-Jan-2019).

<sup>931</sup> VASILJEVIĆAleksandar:T.48(30-Jan-2019); [P02933](#), p.3.

<sup>932</sup> VASILJEVIĆAleksandar:T.40-41(31-Jan-2019).

<sup>933</sup> VASILJEVIĆAleksandar:[P02697](#), T.15864-15865; [REDACTED]; VASILJEVIĆAleksandar:T.48(30-Jan-2019); [P02933](#), p.2-3; ANASTASIJEVIĆDejan:[P02423](#), para.32; [P02968](#), p.3.

<sup>934</sup> [REDACTED].

<sup>935</sup> [REDACTED].

<sup>936</sup> [REDACTED].

<sup>937</sup> [REDACTED].

<sup>938</sup> VASILJEVIĆAleksandar:[P02696](#), T.15863-15864; [REDACTED]; [P02814](#), p.13; ANASTASIJEVIĆDejan:[P02423](#), para.48; [P03753](#), p.2.

constituent security services,<sup>939</sup> consolidating power and information flow within the Accused's service, which they used to advance the CCP.

216. In 1990, Serbia amended its constitution to remove Vojvodina's and Kosovo's autonomy, divesting them of their constitutional and legislative functions,<sup>940</sup> and subordinating their intelligence services to the SerbianDB.<sup>941</sup> Vojvodina Security Service personnel now reported to and were official employees of the SerbianDB.<sup>942</sup>

217. During the tenure of FSUP Minister and MILOŠEVIĆ loyalist GRAČANIN,<sup>943</sup> the SerbianDB gradually overpowered the FederalDB's work and took over its functions in 1991,<sup>944</sup> [REDACTED].<sup>945</sup> The SerbianDB appropriated the FederalDB's materials, documentation, and personnel during 1991, and FederalDB officers understood they were primarily protecting Serbia's interests.<sup>946</sup> [REDACTED].<sup>947</sup> The FederalDB reported to the SerbianDB on issues regarding Serb-claimed territories outside Serbia, because the FederalDB was "not competent as far as the war-time situation".<sup>948</sup> In April 1992, KERTES was installed in the FSUP [REDACTED].<sup>949</sup>

218. Parallel efforts were made to subvert the JNA's intelligence functions. In April 1992, STANIŠIĆ informed VASILJEVIĆ that he intended to place military security under the SerbianDB, giving STANIŠIĆ access to JNA KOS archives.<sup>950</sup> Shortly after this meeting, on 8 May 1992, VASILJEVIĆ was removed and replaced by

<sup>939</sup> NIELSENChristian:[P00850](#), para.10-16; [P00007](#); [REDACTED].

<sup>940</sup> NIELSENChristian:[P00850](#), para.17,20,24,58; MILOŠEVIĆMilan:[2D00451](#), para.72-78. *See* AF21-AF22.

<sup>941</sup> NIELSENChristian:[P00850](#), para.17,20,24,58; MILOŠEVIĆMilan:[2D00451](#), para.72-78; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.28.

<sup>942</sup> [REDACTED]; BOGUNOVIĆBorislav:[P02720](#), T.5996; [REDACTED]; [P00593](#); [P01198](#); [REDACTED].

<sup>943</sup> [REDACTED]; RFJ-153:T.13-14(20-Jun-2017); [REDACTED].

<sup>944</sup> [REDACTED].

<sup>945</sup> [REDACTED].

<sup>946</sup> [REDACTED]; [P02814](#), p.10-11; DRAGICEVIĆVlado:T.48-49(16-Oct-2019); NIELSENChristian:T.31-32(21-Nov-2017).

<sup>947</sup> [REDACTED].

<sup>948</sup> [REDACTED].

<sup>949</sup> [REDACTED]; [P00023](#), p.1.

<sup>950</sup> VASILJEVIĆAleksandar:[P02696](#), T.15863-15864; VASILJEVIĆAleksandar:[P02697](#), T.15864-15865; [REDACTED]. *See also* ANASTASIJEVIĆDejan:[P02423](#), para.32,47-48,50-51.



BOŠKOVIĆ—a JNA officer associated with the *vojna linija*<sup>951</sup>—to carry out what STANIŠIĆ had “chartered”.<sup>952</sup>

219. On 18 October 1992, under STANIŠIĆ’s command,<sup>953</sup> the SMUP forcibly and illegally seized control of the FSUP and its facilities, building, technical equipment and archives,<sup>954</sup> protected by BOŠKOVIĆ’s assurances that the JNA would not intervene.<sup>955</sup>

220. FSUP employees were informed that Serbia wanted “not a united, but only one State Security Service”.<sup>956</sup> As intended, the Federal Minister of Interior declared days later, “what is paralyzed now in the work of the Federal Ministry, is the State Security Service.”<sup>957</sup> Within a month, the (republican) SerbianDB amended its Rules to assert jurisdiction over the entire (federal) FRY territory<sup>958</sup> confirming STANIŠIĆ’s objective as described to VASILJEVIĆ to make the SerbianDB the pre-eminent security organisation.<sup>959</sup>

## **2. STANIŠIĆ and SIMATOVIĆ wielded their significant authority and influence among JCE members in BiH and Croatia to advance the CCP**

221. As high-level SerbianDB officials charged with implementing MILOŠEVIĆ’s policies in Serb-claimed territories in Croatia and BiH, STANIŠIĆ and, to a lesser extent, SIMATOVIĆ had authority over—and coordinated among—JCE members there. STANIŠIĆ coordinated the geographically dispersed and multifaceted JCE composed of powerful personalities who, despite not always agreeing on every method and tactic, remained firmly committed to achieving the CCP. By creating and maintaining channels of communication to transmit instructions, reports, and other critical information between and among Belgrade and regional JCE members,

<sup>951</sup> Cross-reference Section II.E.1(a).

<sup>952</sup> VASILJEVIĆAleksandar:P02697, T.15864-15865; [REDACTED]; VASILJEVIĆAleksandar:T.48(30-Jan-2019); P02933, p.2-3; ANASTASIJEVIĆDejan:P02423, para.32; P02968, p.3.

<sup>953</sup> P03753, p.1; P02814, p.16-17; [REDACTED].

<sup>954</sup> [REDACTED]; STEVANOVIĆObrad:T.24(22-Sep-2020); STEVANOVIĆObrad:T.14-15(30-Sep-2020); STEVANOVIĆObrad:P03851, T.40131; [REDACTED]; P02814, p.10-14; P03753, p.1; P00023, p.7; P00015, p.2-4; [REDACTED]; RFJ-153:T.54-55(14-Jun-2017); VASILJEVIĆAleksandar:P02697, T.15864-15865; [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.33,67-69; [REDACTED]; NIELSENChristian:T.27-28(14-Nov-2017); MILOŠEVIĆMilan:T.46(26-Feb-2020).

<sup>955</sup> VASILJEVIĆAleksandar:P02697, T.15864-15865; [REDACTED].

<sup>956</sup> P02814, p.13. See [REDACTED].

<sup>957</sup> P02814, p.13-14; P03753, p.1-2; [REDACTED].

<sup>958</sup> P00024; RFJ-153:T.55-56(14-Jun-2017); NIELSENChristian:P00850, para.68.

<sup>959</sup> VASILJEVIĆAleksandar:P02696, T.15863-15864; VASILJEVIĆAleksandar:P02697, T.15864-15865.

**STANIŠIĆ** and **SIMATOVIĆ** ensured that JCE members worked in concert to pursue the CCP.

(a) **STANIŠIĆ** and **SIMATOVIĆ** exerted their influence and authority over **MARTIĆ** and **BABIĆ** to advance the CCP in Krajina

222. **STANIŠIĆ** exercised tremendous authority over **MARTIĆ** and **BABIĆ** from early on, which he used to direct the development and use of Serb structures and forces in Krajina to further the CCP.<sup>960</sup>

223. Beginning in August 1990,<sup>961</sup> and continuing throughout the Indictment period, **STANIŠIĆ** was essentially **MARTIĆ**'s direct superior. [REDACTED].<sup>962</sup> **MARTIĆ** listened carefully to **STANIŠIĆ**,<sup>963</sup> [REDACTED].<sup>964</sup> **STANIŠIĆ** dominated and controlled **MARTIĆ**, like a superior over a subordinate.<sup>965</sup> [REDACTED].<sup>966</sup>

224. **STANIŠIĆ**'s authority over **MARTIĆ** is evident from the numerous instructions he issued to him on matters falling outside **STANIŠIĆ**'s *de jure* authority, including: [REDACTED];<sup>967</sup> instructing **MARTIĆ** on establishing the SAO-Krajina police;<sup>968</sup> [REDACTED];<sup>969</sup> ordering him to deploy RSK policemen to Belgrade [REDACTED];<sup>970</sup> and instructing him on RSK government appointments.<sup>971</sup> When **MARTIĆ** attempted to resist **STANIŠIĆ**'s directions, **STANIŠIĆ** brought him back in line.<sup>972</sup>

<sup>960</sup> Cross-reference Section [II.F.1\(a\)\(i\)b](#)-c; Section [II.F.1\(b\)\(i\)a](#)-b; Section [II.F.1\(c\)\(i\)](#).

<sup>961</sup> **BABIĆ**Milan:[P01246](#), T.13123-13125,13129,13490-13491; **BABIĆ**Milan:[P01248](#), T.1390-1393,1567-1568; [REDACTED].

<sup>962</sup> [REDACTED].

<sup>963</sup> **BABIĆ**Milan:[P01248](#), T.1525. [REDACTED]; **BABIĆ**Milan:[P01246](#), T.12930,12932-12933; [REDACTED].

<sup>964</sup> [REDACTED].

<sup>965</sup> **VASILJEVIĆ**Aleksandar:[P02695](#), T.15867; [REDACTED]; [REDACTED], T.3581-3582; **BABIĆ**Milan:[P01248](#), T.1525. See also [P00061](#)(00:12:37-00:15:44); [REDACTED]; [P00324](#).

<sup>966</sup> [REDACTED]; **VASILJEVIĆ**Aleksandar:[P02695](#); [REDACTED]; [P01463](#), p.1.

<sup>967</sup> [REDACTED]; **VASILJEVIĆ**Alexander:[P02695](#); [REDACTED]; [P02943](#); **MILOVANOVIĆ**Manojlo:[P02934](#), T.4426-4427; [1D00036](#), p.19-29; **BABIĆ**Milan:[P01246](#), T.13236-13237.

<sup>968</sup> [REDACTED]; [REDACTED]; RFJ-066:T.11(13-Jul-2017).

<sup>969</sup> Cross-reference Section [II.F.1\(b\)\(i\)b](#); Section [II.F.3\(b\)](#).

<sup>970</sup> [REDACTED]; RFJ-066:T.39-40,46-51(11-Jul-2017); [REDACTED].

<sup>971</sup> **BABIĆ**Milan:[P01246](#), T.13096-13097,13605,13249-13251; [P01293](#), p.2.

<sup>972</sup> [REDACTED]; [1D00037](#), p.98; [P03818](#), p.1(p.1(BCS))("NRDB" followed by "Jovica" is handwritten at the top of the report); **DRAČA**Aco:T.35-36(confirming that "NRDB" means that the report was to be sent to **STANIŠIĆ** as head of the SerbianDB),40(3-Dec-2019).

225. In 1991, as **STANIŠIĆ**'s man on the ground in SAO-Krajina, **SIMATOVIĆ**, exercised authority over **MARTIĆ**. [REDACTED].<sup>973</sup> In the Golubić trainees' early operations, **MARTIĆ** operated under **SIMATOVIĆ**'s authority.<sup>974</sup> [REDACTED],<sup>975</sup> [REDACTED].<sup>976</sup> [REDACTED]<sup>977</sup> reinforces **MARTIĆ**'s complete subordination to him.

226. [REDACTED].<sup>978</sup> **STANIŠIĆ** had authority to preclude **BABIĆ** from making decisions squarely within the remit of **BABIĆ**'s position. In August 1991, for example, it was evident to **BABIĆ** that the SerbianDB was responsible for much of what was happening in SAO-Krajina, through its control over the SAO-KrajinaDB.<sup>979</sup> Attempting to "take power away" from the SerbianDB,<sup>980</sup> **BABIĆ** adopted a decision abolishing the SAO-KrajinaDB.<sup>981</sup> **STANIŠIĆ** found this "unacceptable" and immediately went to Knin to confront **BABIĆ**,<sup>982</sup> who was forced to abandon his decision.<sup>983</sup> When **BABIĆ** refused to heed **MILOŠEVIĆ**'s direction to adopt the Vance Plan (despite **STANIŠIĆ**'s direct intervention) **STANIŠIĆ** helped to oust him from the RSK Presidency.<sup>984</sup>

(b) **STANIŠIĆ** exerted authority and influence over **HADŽIĆ** in coordination with **MILOŠEVIĆ** to advance the CCP in SBWS

227. **STANIŠIĆ** began instructing **HADŽIĆ** on his work in various leadership roles in SAO-SBWS in early 1991,<sup>985</sup> ultimately providing his trusted SerbianDB assets Rade **KOSTIĆ**<sub>(DB)</sub> and Ilija **KOJIĆ**<sub>(DB)</sub> to direct **HADŽIĆ** in establishing SAO-SBWS police and defence structures.<sup>986</sup> **STANIŠIĆ** was **HADŽIĆ**'s link to **MILOŠEVIĆ**, through

<sup>973</sup> [REDACTED]. See also **BABIĆ**Milan:[P01246](#), T.13121,13123,13129,13492-13493; **BABIĆ**Milan:[P01248](#), T.1390-1397,1567-1568.

<sup>974</sup> Cross-reference Section [II.F.1\(c\)\(ii\)a-c](#). See e.g. [REDACTED]; **BABIĆ**Milan:[P01246](#), T.13748.

<sup>975</sup> [REDACTED]; RFJ-066:T.34-35(10-Jul-2017). See also **BABIĆ**Milan:[P01246](#), T.13161,13163-13164.

<sup>976</sup> [REDACTED].

<sup>977</sup> [REDACTED].

<sup>978</sup> [REDACTED]. See also **BABIĆ**Milan:[P01246](#), T.13744.

<sup>979</sup> Cross-reference Section [II.F.1\(b\)\(i\)b](#). **BABIĆ**Milan:[P01248](#), T.1417-1418,1807-1808.

<sup>980</sup> **BABIĆ**Milan:[P01248](#), T.1417-1418,1807-1808.

<sup>981</sup> [P01307](#).

<sup>982</sup> **BABIĆ**Milan:[P01248](#), T.1420. See also [REDACTED].

<sup>983</sup> **BABIĆ**Milan:[P01248](#), T.1420; [ID01376](#), p.11-12.

<sup>984</sup> **BABIĆ**Milan:[P01246](#), T.13136,13492-13493; [REDACTED]. Cross-reference Section [II.F.3\(a\)](#).

<sup>985</sup> **BOGUNOVIĆ**Borislav:[P02719](#), para.15,18; **BOGUNOVIĆ**Borislav:[P02720](#), T.5973-5974; **BOGUNOVIĆ**Borislav:[P02718](#), para.82. See also [REDACTED].

<sup>986</sup> Cross-reference Section [II.F.2\(b\)-\(c\)](#); Section [II.F.2\(d\)\(i\)](#); Section [II.F.2\(d\)\(ii\)](#).

whom MILOŠEVIĆ exerted influence over HADŽIĆ on the ground.<sup>987</sup> BABIĆ, who attended “quite a few meetings” with HADŽIĆ, confirmed that HADŽIĆ was completely under STANIŠIĆ’s control.<sup>988</sup>

228. STANIŠIĆ’s authority over HADŽIĆ extended to operations that furthered the CCP, as demonstrated in mid-September 1991 when STANIŠIĆ arrived in Dalj and, [REDACTED], began shouting, outraged that Vukovar had not fallen yet.<sup>989</sup> [REDACTED],<sup>990</sup> during which STANIŠIĆ led the planning for operations to “liberate” Vukovar.<sup>991</sup>

(c) STANIŠIĆ coordinated between the BiH and Belgrade JCE leadership to advance the CCP in BiH

229. From 1991, as he stepped up his involvement in the political and military affairs of BiH,<sup>992</sup> STANIŠIĆ played a key role in coordinating relations between the Serbian and Bosnian Serb leadership,<sup>993</sup> enjoying significant influence among the Bosnian Serb leaders—including KARADŽIĆ, KRAJIŠNIK, M.STANIŠIĆ, and MLADIĆ—who sought advice from STANIŠIĆ and MILOŠEVIĆ [REDACTED].<sup>994</sup> In the latter stages of the JCE, as disagreement between MILOŠEVIĆ and KARADŽIĆ over the rejection of peace plans frayed their relations,<sup>995</sup> MILOŠEVIĆ increasingly resorted to STANIŠIĆ to “execute his will” in BiH when his own attempts failed.<sup>996</sup> Through STANIŠIĆ, MILOŠEVIĆ controlled KARADŽIĆ.<sup>997</sup>

<sup>987</sup> BOGUNOVIĆBorislav:[P02719](#), para.15,18. See also BOGUNOVIĆBorislav:[P02720](#), T.5972-5975,5977-5978,5982-5984,5997,6042-6043,6045-6046; BABIĆMilan:[P01246](#), T.13230; [P00485](#), p.6; SAVIĆBorivoje:T.59-60(12-Sep-2017).

<sup>988</sup> BABIĆMilan:[P01246](#), T.13227-13230; [P00485](#), p.6; SAVIĆBorivoje:T.59-60(12-Sep-2017). See also [REDACTED].

<sup>989</sup> [REDACTED]; RFJ-113:T.57-58(26-Sep-2017); [REDACTED].

<sup>990</sup> [REDACTED].

<sup>991</sup> RFJ-113:T.58(26-Sep-2017); [REDACTED].

<sup>992</sup> Cross-reference Section [II.F.4\(a\)\(ii\)a-b](#).

<sup>993</sup> See e.g. [1D00036](#), p.53(The fact that STANIŠIĆ was the first speaker at a meeting attended by MILOŠEVIĆ and KARADŽIĆ is indicative of his high status among JCE members, as well as the coordinating role he played between the Serbian and Bosnian Serb leadership).

<sup>994</sup> [REDACTED]. See also NIELSENChristian:[P00850](#), p.15,252-253,859; [1D00036](#), p.53; [P02896](#), p.39; [P02943](#); [P02942](#); MILOVANOVIĆManojlo:[P02934](#), T.4423-4424,4426-4427.

<sup>995</sup> Cross-reference Section [II.F.5\(a\)\(i\)](#).

<sup>996</sup> ROBERTSIvor:T.17-19(15-Oct-2019); [REDACTED]; ROBERTSIvor:[1D00430](#), para.135,137.

<sup>997</sup> BABIĆMilan:[P01246](#), T.13576-13577.

**3. Through the SerbianDB/SMUP, the Accused and other JCE members executed an organised, covert arming campaign to arm Serbs in Croatia and BiH**

230. Beginning in latter 1990, the Accused, MILOŠEVIĆ, BOGDANOVIĆ, and KERTES initiated what became a massive, covert and long-term campaign to arm the Croatian and Bosnian Serbs, enabling them to implement the CCP. By late 1990, the Accused had delivered their first shipments in Croatia, relying on individuals in the SMUP (including the SerbianDB) to coordinate with trusted individuals from the JNA. They organised convoys of weapons in Belgrade and coordinated with SDS and Serb police officials (and the SerbianDB associates among them) in Krajina, SBWS, and BiH to distribute weapons to co-JCE members and their associates. One of the schemes used for funnelling arms to Croatian and Bosnian Serbs was partnering with a so-called humanitarian organisation in Serbia known as Matica. For at least three years, from 1991 throughout 1993, STANIŠIĆ spearheaded this organised arming campaign to send thousands of weapons deep into Serb-targeted territory in Croatia and BiH. During the FRY's blockade of the RS in 1994-1995,<sup>998</sup> with MILOŠEVIĆ's approval, the SMUP and SerbianDB continued secretly facilitating arms transfers, concealing from the international community their continued assistance to Serb Forces. The organisation, cooperation, coordination, and consistency in implementing this covert arming campaign from 1991 to 1995 demonstrates its importance to the CCP and the Accused's role therein.

231. The arms provided by the Accused were not supplied for defensive purposes, but rather for purposes of achieving the forcible removal of non-Serbs through the crimes of murder, persecution, and forcible displacement. This was immediately evident in the Serb Forces' first operations in SAO-Krajina and SAO-SBWS.<sup>999</sup> The Accused's weapons program enabled offensive attack operations intended to implement the CCP. That was its purpose.

**(a) The SMUP and SerbianDB spearheaded a massive arming campaign across Croatia and BiH**

232. From 1990, the SerbianDB and SMUP were continuously involved in arming Serb Forces in Croatia and BiH, adapting their role and activities to the context. They

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<sup>998</sup> Cross-reference Section [II.F.5](#).

played a particularly important role in organising arms from Belgrade until August 1991, while the JNA was ostensibly neutral and not fully trusted by much of the Serb population in Croatia and BiH.<sup>1000</sup> Once JNA and TO depots in Krajina and SBWS made weapons available to the Serb population and forces, the convoys organised by the Accused from Serbia were less critical there,<sup>1001</sup> and the SerbianDB focused its covert arming efforts more intensively in BiH.

233. Concealing the involvement of Serbia's state organs—especially the SMUP—was central to the process.<sup>1002</sup> As **STANIŠIĆ** cautioned: the “[s]mallest possible number of people should be involved in this.”<sup>1003</sup> JCE members took measures to minimise the number of people who knew of Serbia's contribution,<sup>1004</sup> concealing weapons as humanitarian aid and other materials for transport,<sup>1005</sup> using [REDACTED]<sup>1006</sup> and coded language to discuss arms shipments.<sup>1007</sup>

(i) **SIMATOVIĆ** and **STANIŠIĆ** covertly armed Serbs in Croatia by late 1990

234. Well before the outbreak of hostilities, early arming from Belgrade came through the SerbianDB. [REDACTED].<sup>1008</sup> Also around August, while **KOJIĆ<sub>(DB)</sub>** was still working for the Vukovar SUP, the SerbianDB contacted him to enlist his cooperation in covertly bringing arms from Serbia into SBWS and distributing them among loyal Serbs.<sup>1009</sup>

<sup>999</sup> Cross-reference Section [III.B](#). E.g. [REDACTED]; RFJ-113:T.79(28-Sep-2017); [REDACTED].

<sup>1000</sup> Cross-reference Section [II.E.1](#). The earliest weapons distributed by the Accused and their SerbianDB operatives and associates originated from Serbian TO depots in Belgrade: e.g. [REDACTED] [REDACTED]; [P00383](#); ANASTASIJEVIĆDejan:T.55-56(20-Jun-2018); ANASTASIJEVIĆDejan:[P02423](#), para.89. See also SAVIĆBorivoje:T.78,86(13-Sep-2017); VASILJEVIĆAleksandar:T.23(30-Jan-2019).

<sup>1001</sup> [REDACTED]; [REDACTED]. See [P01432](#); [1D00037](#), p.113,115; BABIĆMilan:[P01248](#), T.1531-1534; [REDACTED]; BABIĆMilan:[P01246](#), T.13272-13278; [REDACTED]; ANASTASIJEVIĆDejan:T.58-60(20-Jun-2018); BOSNIĆMile:T.17-19(21-Aug-2019).

<sup>1002</sup> ANASTASIJEVIĆDejan:T.76(21-Jun-2018).

<sup>1003</sup> [P01734](#), p.40.

<sup>1004</sup> [P01734](#), p.40; BABIĆMilan:[P01248](#), T.1527; DERONJIĆMiroslav:[P01717](#), para.21.

<sup>1005</sup> [REDACTED]; OFS-23:T.15(15-Sep-2020); [REDACTED].

<sup>1006</sup> [REDACTED].

<sup>1007</sup> E.g. [P01446](#); [REDACTED]; [1D00042](#), p.2-3; DERONJIĆMiroslav:[P01718](#), T.950-958; [REDACTED].

<sup>1008</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.12930,12932-12933; [REDACTED]. See also [REDACTED].

<sup>1009</sup> [REDACTED]; SAVIĆBorivoje:[P00449](#), para.44,47; SAVIĆBorivoje:T.88-89(13-Sep-2017); SAVIĆBorivoje:T.11-12,114-115(14-Sep-2017). See also [REDACTED]. Cross-reference Section [II.F.2\(d\)](#).



235. Around mid-November or December 1990, [REDACTED],<sup>1010</sup> **SIMATOVIĆ** and SerbianDB operative **KOSTIĆ<sub>(DB)</sub>**, arrived in Knin<sup>1011</sup> with trucks of [REDACTED] rifles, [REDACTED], and other weapons.<sup>1012</sup>

236. By December 1990, **SIMATOVIĆ** returned to Knin with “**STANIŠIĆ**’s man”<sup>1013</sup> Uroš **POKRAJAC<sub>(DB)</sub>**,<sup>1014</sup> [REDACTED].<sup>1015</sup> [REDACTED].<sup>1016</sup> [REDACTED].<sup>1017</sup> [REDACTED]<sup>1018</sup> [REDACTED].<sup>1019</sup>

237. [REDACTED].<sup>1020</sup> [REDACTED].<sup>1021</sup> [REDACTED].<sup>1022</sup> [REDACTED].<sup>1023</sup>

(ii) By early 1991, Belgrade JCE members coordinated with JCE members in Croatia and BiH to arm Serbs

238. From early 1991 at the latest, **MILOŠEVIĆ**, **STANIŠIĆ**, **SIMATOVIĆ**, SMUP Minister **BOGDANOVIĆ**, and **MILOŠEVIĆ**’s so-called “minister for arming the people”<sup>1024</sup> **KERTES** pledged their commitment to arm Serbs in Croatia and BiH.<sup>1025</sup> For example:

- Around 20 March 1991, **STANIŠIĆ**, **MILOŠEVIĆ**, and **BOGDANOVIĆ** met with **BABIĆ** and **MARTIĆ** to discuss procuring weapons for the Krajina Serbs.<sup>1026</sup> **MILOŠEVIĆ** said he had purchased 20,000 weapons for Krajina Serbs, and **BOGDANOVIĆ** confirmed that they had sent 500 to Banija.<sup>1027</sup> Confirming the covert nature of this operation, when **BABIĆ** claimed not to know about this,

<sup>1010</sup> [REDACTED].

<sup>1011</sup> [P00522](#), p.21-22; [REDACTED].

<sup>1012</sup> [REDACTED]; RFJ-066:T.21-24(11-Jul-2017); [REDACTED].

<sup>1013</sup> [REDACTED].

<sup>1014</sup> [REDACTED]; RFJ-066:T.5-8(23-Aug-2017); [P00834](#), p.3.

<sup>1015</sup> [REDACTED].

<sup>1016</sup> [REDACTED].

<sup>1017</sup> [REDACTED]. See also **BABIĆ** Milan: [P01246](#), T.13270,13680.

<sup>1018</sup> [REDACTED].

<sup>1019</sup> [REDACTED].

<sup>1020</sup> [REDACTED].

<sup>1021</sup> [REDACTED].

<sup>1022</sup> [REDACTED].

<sup>1023</sup> [REDACTED].

<sup>1024</sup> [P01624](#), p.4.

<sup>1025</sup> [REDACTED].

<sup>1026</sup> [REDACTED]; [P02453](#); **ANASTASIJEVIĆ** Dejan: T.77(21-Jun-2018).

<sup>1027</sup> [REDACTED]; **BABIĆ** Milan: [P01248](#), T.1526-1527; **BABIĆ** Milan: [P01246](#), T.13654; [REDACTED]; [P02453](#); **ANASTASIJEVIĆ** Dejan: T.77(21-Jun-2018).



BOGDANOVIĆ responded, “[w]ell, you’re not supposed to know everything.”<sup>1028</sup>

- [REDACTED].<sup>1029</sup>
- By April 1991, KARADŽIĆ and MILOŠEVIĆ had agreed that the Bosnian Serbs must be armed.<sup>1030</sup> KERTES made clear that the purpose of the arming scheme was to achieve the CCP when he assured local SDS officials in April/May 1991 of Serbia’s continued assistance, to ensure that the Podrinje area would be “pure” Serb.<sup>1031</sup>
- In June 1991, KERTES informed KARADŽIĆ that MILOŠEVIĆ had given STANIŠIĆ and KERTES “carte blanche” for the arming operation.<sup>1032</sup> KERTES foreshadowed that “there would be convoys and convoys now”.<sup>1033</sup>

(iii) STANIŠIĆ partnered with Matica to arm Serbs outside Serbia

239. STANIŠIĆ arranged covert weapons shipments through a proxy called Matica—the Association for Serbian Émigrés, purportedly a humanitarian organisation<sup>1034</sup>—at least throughout 1991 to 1993,<sup>1035</sup> further concealing Serbia’s role in arming Serbs in Croatia and BiH.<sup>1036</sup>

240. STANIŠIĆ and his subordinates TEPAVČEVIĆ<sub>(DB)</sub> and Milan PRODANIĆ<sub>(DB)</sub> met daily at the SerbianDB building in Belgrade, sometimes with KERTES and Brana CRNČEVIĆ, Matica’s President, to assess the military equipment and supply requirements of Serbs in Croatia and BiH.<sup>1037</sup> MILOŠEVIĆ received regular briefings about, and sometimes attended, these meetings, and ordered that he be kept informed of weapons deliveries.<sup>1038</sup>

<sup>1028</sup> BABIĆ Milan: [P01248](#), T.1527.

<sup>1029</sup> [REDACTED].

<sup>1030</sup> DERONJIĆ Miroslav: [P01717](#), para.8; DERONJIĆ Miroslav: [P01718](#), T.947-948; DERONJIĆ Miroslav: [P01719](#), T.29744.

<sup>1031</sup> DERONJIĆ Miroslav: [P01717](#), para.17,19-21.

<sup>1032</sup> [ID00042](#), p.3; DERONJIĆ Miroslav: [P01718](#), T.950-958; [REDACTED].

<sup>1033</sup> [P01446](#), p.3; [REDACTED].

<sup>1034</sup> SAVIĆ Borivoje: T.44-45(12-Sep-2017).

<sup>1035</sup> [REDACTED].

<sup>1036</sup> [P00482](#); ANASTASIJEVIĆ Dejan: [P02423](#), para.81.

<sup>1037</sup> [REDACTED].

<sup>1038</sup> [REDACTED]. See also SAVIĆ Borivoje: [P00449](#), para.107,179.

241. After meeting together, **STANIŠIĆ** would dispatch PRODANIĆ<sub>(DB)</sub> to Bubanj Potok, one of the largest weapons and ammunition warehouses in the former Yugoslavia,<sup>1039</sup> to inform Lt. Col. Bora STANIŠIĆ, the JNA officer-in-charge, “what Dad ordered”, referring to MILOŠEVIĆ.<sup>1040</sup> B.STANIŠIĆ loaded trucks with weapons and ammunition and dispatched them to BiH and Croatia, with drivers supplied by Matica.<sup>1041</sup> PRODANIĆ<sub>(DB)</sub> contacted police checkpoints along the delivery routes to ensure the convoys would not be searched.<sup>1042</sup>

242. Only “a very small circle of people” in the JNA and SMUP were aware of this operation, [REDACTED].<sup>1043</sup> Only B.STANIŠIĆ and PRODANIĆ<sub>(DB)</sub> went to the Bubanj Potok warehouse.<sup>1044</sup> Concerned about being overheard at Bubanj Potok, PRODANIĆ<sub>(DB)</sub> and B.STANIŠIĆ later moved their meetings to Matica’s hall at the Belgrade fairgrounds,<sup>1045</sup> [REDACTED].<sup>1046</sup> Matica also used a parking space at the Belgrade fairgrounds where vehicles could be discreetly parked and loaded before leaving for the RS or RSK.<sup>1047</sup> The SerbianDB gave money to Matica to pay employee salaries and upkeep its premises.<sup>1048</sup>

243. Once Slovenia, Croatia, and Macedonia began to withdraw from Yugoslavia, their military equipment was brought back to the Bubanj Potok warehouse and other JNA storage facilities around Belgrade. Matica’s arming scheme shipped these weapons off to Serbs outside Serbia, taking advantage of the fact that these weapons were not necessarily accounted for.<sup>1049</sup> The SMUP also provided weaponry from its warehouses at Ostružnica (from which the Unit transported weapons), Makis, and later from Lipovica, where the Unit also had a base.<sup>1050</sup> The SerbianDB also procured more specialised equipment that was unavailable in military warehouses, such as silencers, from private producers.<sup>1051</sup>

<sup>1039</sup> [REDACTED]; DERONJIĆ Miroslav: [P01717](#), para.19-20. See also [1D01446](#), p.10-11.

<sup>1040</sup> [REDACTED].

<sup>1041</sup> [REDACTED]. See also [P01804](#); [REDACTED]; [P01807](#); [REDACTED].

<sup>1042</sup> [REDACTED].

<sup>1043</sup> [REDACTED].

<sup>1044</sup> [REDACTED]. See also [1D00037](#), p.103-104; [P02983](#).

<sup>1045</sup> [REDACTED]; SAVIĆ Borivoje: T.20-22(14-Sep-2017).

<sup>1046</sup> [REDACTED].

<sup>1047</sup> [REDACTED]; SAVIĆ Borivoje: T.20-22(14-Sep-2017).

<sup>1048</sup> SAVIĆ Borivoje: T.114(14-Sep-2017).

<sup>1049</sup> [REDACTED].

<sup>1050</sup> [REDACTED]; [P00260](#), p.32.

<sup>1051</sup> [REDACTED].

244. Matica received weapons orders through various channels. JCE members MARTIĆ, HADŽIĆ, PLAVŠIĆ, and KRAJIŠNIK, and SerbianDB associates Captain DRAGAN<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub> frequented Matica's offices.<sup>1052</sup> As head of Matica's Transportation Unit, RFJ-095 met with KARADŽIĆ, MLADIĆ, PLAVŠIĆ, and STANIŠIĆ's deputy TEPAVČEVIĆ<sub>(DB)</sub> regarding arms shipments.<sup>1053</sup> CRNČEVIĆ had special telephone lines in his office linking directly to MILOŠEVIĆ and the SerbianDB, so that he could convey what he learned from the conflict zones to inform weapons needs.<sup>1054</sup> Serb Forces would also submit detailed weapons requests in writing.<sup>1055</sup>

245. Matica convoys normally consisted of 10 to 15 military trucks and SMUP trucks provided by the SerbianDB.<sup>1056</sup> RFJ-095 estimated that 1,200 truckloads of arms were transferred from Bujanj Potok in 1992 alone.<sup>1057</sup> [REDACTED].<sup>1058</sup> After the conflict began in BiH, convoys went nearly on a daily basis to BiH.<sup>1059</sup>

(iv) STANIŠIĆ, BOGDANOVIĆ, and KERTES worked with KOSTIĆ<sub>(DB)</sub> and other SerbianDB associates to arm Serb Forces in SBWS and BiH through local SDS and police structures

246. STANIŠIĆ, BOGDANOVIĆ, and KERTES regularly met with Serb police and SDS officials from Krajina, SBWS, and BiH to coordinate weapons distributions.<sup>1060</sup> Just as KOSTIĆ<sub>(DB)</sub> was instrumental in SIMATOVIĆ's continuing work arming Krajina, STANIŠIĆ, BOGDANOVIĆ, and KERTES relied heavily on him in arming Serb Forces in SBWS and BiH.

a. Krajina

247. On 4 and 7 April 1991, [REDACTED], the SerbianDB sent two convoys with weapons and ammunition to Knin.<sup>1061</sup> In May and July or early August, BABIĆ saw

<sup>1052</sup> [REDACTED]. See also [P02881](#); [REDACTED].

<sup>1053</sup> [REDACTED].

<sup>1054</sup> [REDACTED].

<sup>1055</sup> [REDACTED]; [P01808](#); [P00482](#). See also [P01811](#); [P01809](#).

<sup>1056</sup> [REDACTED]. See also RFJ-066:T.3(11-Jul-2017)(Mercedes 12 or 13 used for weapons transport).

<sup>1057</sup> [REDACTED].

<sup>1058</sup> [REDACTED]; [P00482](#); SAVIĆBorivoje:T.48(12-Sep-2017); SAVIĆBorivoje:T.19(14-Sep-2017).

<sup>1059</sup> [REDACTED]. See also [P02881](#).

<sup>1060</sup> See e.g. [REDACTED]; DERONJIĆMiroslav:[P01717](#), para.11-28; VASILJEVIĆAleksandar:T.7,11,14(30-Jan-2019); ANASTASIJEVIĆDejan:[P02423](#), para.63; [REDACTED].

<sup>1061</sup> [P02453](#); [REDACTED].

warehouses near Knin containing rifles, mortars, and other weapons, which were brought to Krajina from Serbia with **STANIŠIĆ**'s assistance after KERTES obtained them by "kicking his way" into Serbian TO warehouses.<sup>1062</sup> [REDACTED].<sup>1063</sup>

248. In June and July 1991, ARKAN and his men—then known as *Delije*—secured covert shipments of weapons from Serbian TO depots to the Krajina, SBWS, and BiH.<sup>1064</sup> Both BABIĆ and MARTIĆ were aware of the transports to Krajina, and, alongside Nebojša MANDINIĆ<sub>(DB)</sub>, [REDACTED].<sup>1065</sup> **STANIŠIĆ** and the SerbianDB received several reports about this supply network, which kept operating, with **STANIŠIĆ** ensuring their impunity.<sup>1066</sup>

249. In a 28 July 1991 report, **SIMATOVIĆ** acknowledged that the JNA was sending weapons and oil to SAO-Krajina pursuant to an agreement between BABIĆ and the JNA. **SIMATOVIĆ** cautioned, "[w]e think that such uncoordinated distribution can lead to a split in the so far compact defence of Krajina [...] If such situation causes disorder in the defence, we will react and stop such activities on time."<sup>1067</sup>

#### b. SBWS

250. Around April/May 1991, the SerbianDB intensified its arming activities in SBWS. [REDACTED],<sup>1068</sup> [REDACTED]<sup>1069</sup> [REDACTED].<sup>1070</sup> [REDACTED].<sup>1071</sup> KERTES asked the Borovo Selo Serbs to give him lists of the weapons they required, [REDACTED].<sup>1072</sup> [REDACTED].<sup>1073</sup>

251. KERTES also met with larger groups of Slavonian leaders, including HADŽIĆ, in Bačka Palanka.<sup>1074</sup> KERTES promised—as he had in Borovo Selo—to convey the

<sup>1062</sup> BABIĆMilan:[P01248](#), T.1527-1528,1530; [REDACTED]; BABIĆMilan:[P01246](#), T.13104-13106. *See also* [P02445](#), p.85.

<sup>1063</sup> [REDACTED]. *Cross-reference* Section [II.F.1\(b\)\(i\)a](#).

<sup>1064</sup> [REDACTED]; [P00383](#), p.2-3; [P00384](#), p.1; [REDACTED]; VASILJEVIĆAleksandar:T.17-18,22-24(30-Jan-2019); NOVAKOVIĆStojan:T.11(8-Oct-2020); [REDACTED].

<sup>1065</sup> [P00383](#), p.2; [P00384](#), p.2; [REDACTED].

<sup>1066</sup> [P00383](#), p.2; [P00857](#); THEUNENSReynaud:T.97-99(22-Mar-2018); NIELSENChristian:T.106-107(23-Nov-2017).

<sup>1067</sup> [P00843](#)(BCS).

<sup>1068</sup> [REDACTED].

<sup>1069</sup> [REDACTED].

<sup>1070</sup> [REDACTED]; RFJ-113:T.44-45(26-Sep-2017).

<sup>1071</sup> [REDACTED].

<sup>1072</sup> [REDACTED]; [P00485](#), p.1,7; [REDACTED].

<sup>1073</sup> [REDACTED].

<sup>1074</sup> [P00485](#), p.2.

Slavonian Serbs' weapons requirements to Belgrade<sup>1075</sup> and urged them to "end all contacts with any kind [of] pseudo helpers" who offered help but "are in fact not able to do anything concrete".<sup>1076</sup> KERTES and the SerbianDB also supplied weapons to the Šidski Banovci TO in Western Srem.<sup>1077</sup> SerbianDB operatives monitored the supply channel and sent reports up the chain of command.<sup>1078</sup>

252. [REDACTED].<sup>1079</sup>

253. [REDACTED].<sup>1080</sup> [REDACTED].<sup>1081</sup> [REDACTED].<sup>1082</sup>

c. BiH

254. Around April/May 1991, KERTES met with SDS officials to arrange the first convoys carrying weapons from Bubanj Potok to Bratunac and Srebrenica,<sup>1083</sup> explaining that he was "in charge" of arming.<sup>1084</sup> The first weapons shipments from Belgrade to [REDACTED], Bratunac, [REDACTED] took place [REDACTED] May 1991.<sup>1085</sup> [REDACTED].<sup>1086</sup> Once in BiH, SDS officials secretly distributed these weapons to trusted Serbs in their municipalities.<sup>1087</sup> [REDACTED].<sup>1088</sup>

255. By July 1991, **STANIŠIĆ** and BOGDANOVIĆ were receiving SDS officials from BiH in Belgrade to arrange arms transfers,<sup>1089</sup> with **STANIŠIĆ** personally verifying the paperwork and providing a phone number.<sup>1090</sup> Using cryptic language, **STANIŠIĆ** updated KARADŽIĆ on the arms transports on 8 August 1991. KARADŽIĆ told **STANIŠIĆ** that he still needed "those 60 tons", to which **STANIŠIĆ** assured him that "it's being worked on constantly", and noted that in the last week one man had "finished

<sup>1075</sup> [P00485](#), p.6-7.

<sup>1076</sup> [P00485](#); [REDACTED].

<sup>1077</sup> [REDACTED]; [P02445](#), p.90.

<sup>1078</sup> See e.g. [P00485](#).

<sup>1079</sup> [REDACTED].

<sup>1080</sup> [REDACTED].

<sup>1081</sup> [REDACTED].

<sup>1082</sup> [REDACTED].

<sup>1083</sup> DERONJIĆMiroslav:[P01717](#), para.11-28.

<sup>1084</sup> DERONJIĆMiroslav:[P01717](#), para.15.

<sup>1085</sup> DERONJIĆMiroslav:[P01718](#), T.962-964; [REDACTED].

<sup>1086</sup> [REDACTED].

<sup>1087</sup> DERONJIĆMiroslav:[P01718](#), T.962-964; DERONJIĆMiroslav:[P01717](#), para.28.

<sup>1088</sup> [REDACTED].

<sup>1089</sup> [P01734](#), p.3,34-35.

<sup>1090</sup> [P01734](#), p.37,40.

a certain job”, and that KEROVIĆ—an SDS official **STANIŠIĆ** had met with BOGDANOVIĆ<sup>1091</sup>—[REDACTED].<sup>1092</sup> [REDACTED].<sup>1093</sup>

256. [REDACTED].<sup>1094</sup> OFS-23, [REDACTED], received instructions from KOSTIĆ<sub>(DB)</sub> to drive a truck to the Belgrade fairgrounds and leave it there.<sup>1095</sup> In the afternoon, when OFS-23 picked up the truck, it was loaded with wheat flour and [REDACTED].<sup>1096</sup> [REDACTED].<sup>1097</sup> [REDACTED].<sup>1098</sup> SDS officials from elsewhere in BiH also sent trucks to collect weapons from Belgrade.<sup>1099</sup>

257. KOSTIĆ<sub>(DB)</sub> organised weapons transfers from Baranja to Zvornik with SerbianDB associate Marko PAVLOVIĆ<sub>(DB)</sub>.<sup>1100</sup> PAVLOVIĆ<sub>(DB)</sub> arranged for Zvornik [REDACTED] to collect weapons from SAO-SBWS TO warehouses in Baranja and to transport them back to Zvornik, concealed under bags of flour.<sup>1101</sup>

258. [REDACTED].<sup>1102</sup> [REDACTED]<sup>1103</sup> The Belgrade JCE members’ extensive coordination with the SDS in BiH paid off: in March 1992, the JNA reported that the SDS had distributed 17,298 weapons to volunteers in BiH.<sup>1104</sup>

259. **STANIŠIĆ** and KERTES also facilitated an arms flow from the FSUP into BiH. [REDACTED],<sup>1105</sup> [REDACTED].<sup>1106</sup> From April 1992, the SMUP and FSUP Ministers agreed that cooperation with the RS-MUP—including weapons transfers to the RS-MUP—should go through the SMUP exclusively, rather than the FSUP.<sup>1107</sup> [REDACTED].<sup>1108</sup>

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<sup>1091</sup> [P01734](#), p.35.

<sup>1092</sup> [REDACTED].

<sup>1093</sup> [REDACTED].

<sup>1094</sup> [REDACTED].

<sup>1095</sup> OFS-23:T.15(15-Sep-2020); [REDACTED].

<sup>1096</sup> OFS-23:T.15(15-Sep-2020); [REDACTED].

<sup>1097</sup> OFS-23:T.15(15-Sep-2020); [REDACTED].

<sup>1098</sup> [REDACTED].

<sup>1099</sup> [P01734](#), p.41-42.

<sup>1100</sup> Cross-reference Section [II.F.4\(b\)\(i\)b.i.](#)

<sup>1101</sup> [REDACTED]; OFS-23:T.15(15-Sep-2020); OFS-23:T.13-16(16-Sep-2020); [REDACTED].

<sup>1102</sup> [REDACTED].

<sup>1103</sup> [REDACTED].

<sup>1104</sup> [P03345](#), p.5; DERONJIĆMiroslav:[P01718](#), T.1005.

<sup>1105</sup> [REDACTED].

<sup>1106</sup> [REDACTED]. See also AF708; SELAKOsmán:[ID00559](#), T.17425-17426(corroborating the SerbianDB’s involvement in transporting weapons into BiH by air).

<sup>1107</sup> [P01628](#), p.1; [REDACTED].

<sup>1108</sup> [REDACTED].

260. Predrag RADULOVIĆ<sub>(DB)</sub>, the Accused's asset in the Banja Luka DB, worked with the SerbianDB on arming Serbs throughout BiH and Slavonia beginning in July 1991.<sup>1109</sup> Through the "Miloš" group,<sup>1110</sup> in March and April 1992, RADULOVIĆ<sub>(DB)</sub> sought and followed instructions from the SerbianDB regarding arming in the Posavina Corridor and ARK regions.<sup>1111</sup>

261. On 2 July 1993, KARADŽIĆ and KRAJIŠNIK met STANIŠIĆ, BADŽA, and MLADIĆ at Mali Zvornik. STANIŠIĆ made clear that the SMUP would contribute materially to the VRS, stating that "[t]he majority of what we need should be issued via the MUP of Serbia".<sup>1112</sup>

(b) The SerbianDB/SMUP secretly facilitated arming for the VRS during the 1994 "blockade" of RS

262. The SerbianDB continuously distributed weapons and military supplies to Serbs in BiH even during the FRY's purported blockade on the RS,<sup>1113</sup> during which the Defence alleges that MILOŠEVIĆ had cut off support.<sup>1114</sup> During this period, the SerbianDB's specialisation in covert operations gave renewed prominence to its role in the arming.<sup>1115</sup>

263. The CIA reported in 1995 that since late 1994, the SMUP "ha[d] distracted [international] monitors and provided escorts for shipments" of munitions for the VRS,<sup>1116</sup> with 10-truck convoys leaving the Krušik ammunition plant in Serbia twice weekly under SMUP escort, while SIMATOVIĆ reportedly worked with a Serbian munitions firm to produce rockets for the SerbianDB to deliver to the VRS.<sup>1117</sup>

264. STANIŠIĆ and SIMATOVIĆ met with KARADŽIĆ, KRAJIŠNIK, and BABIĆ in Bijeljina in May 1995 to discuss having the RSK make a fictitious payment to Krušik

<sup>1109</sup> [P00854](#), p.1. Cross-reference Section [II.F.4\(a\)\(ii\)b.ii.](#)

<sup>1110</sup> Cross-reference [II.F.4\(a\)\(ii\)b.ii.](#)

<sup>1111</sup> [P03473](#); [P03478](#); [P03481](#). See also [P03482](#).

<sup>1112</sup> [P02890](#), p.233-234; DONIARobert:T.65-66(2-Feb-2018).

<sup>1113</sup> [REDACTED]. See DONIARobert:T.59(1-Feb-2018); ROBERTSIvor:[1D00429](#), para.5-6; KARANMladen:T.31-32(30-Jan-2020); [REDACTED].

<sup>1114</sup> DONIARobert:T.68(2-Feb-2018). See also T.34-35(18-Jun-2019).

<sup>1115</sup> Cross-reference Section [II.F.5\(a\).](#)

<sup>1116</sup> [1D01346](#), p.3-4.

<sup>1117</sup> [P00852](#), p.8. See also [P03169](#)(VRS received Krušik munitions from FRY in January 1995); [P03473](#)(SMUP facilitated Krušik purchases for Bosnian Serbs by March 1992).



factories in Serbia that were producing “a large quantity” of military equipment for the RS, as “a pretense” to “get[] around the embargo”.<sup>1118</sup>

265. MLADIĆ’s notes on 6 April 1995 confirm the SerbianDB’s role in organising munitions convoys and rockets, with STANIŠIĆ stating: “They got the 207 mm missile and they want to throw it in Bihać. They are going to produce 15 of them”; “[t]he stuff planned for PRETIS [RS munitions firm that coordinated with Krušik]<sup>1119</sup> we transported all in 14 trailer-trucks”; and “[w]e transported everything for MARTIĆ.”<sup>1120</sup>

**4. STANIŠIĆ and SIMATOVIĆ and their Unit trained Serb Forces, which JCE members used to advance the CCP**

266. Throughout the Indictment period, the Accused continuously contributed to the CCP by organising, supplying, financing, supporting, and directing the training of Serb Forces in Croatia, BiH, and Serbia that they and their fellow JCE members used in ethnic cleansing operations to further the CCP. Beginning in April 1991 with the Accused’s establishment of the flagship training camp at Golubić and subsequent formation of the Unit,<sup>1121</sup> the Accused and Unit members under their authority founded training camps across SAO-Krajina, SAO-SBWS, BiH, and Serbia<sup>1122</sup> in locations proximate to planned ethnic cleansing operations. From the Accused’s expansive network of training camps, Unit members trained and equipped local recruits, paramilitary units, and other Serb Forces, including members of the TO, police, and VRS, in preparation for persecutory expulsion campaigns. Some trainees returned to their home towns to establish and train other Serb units for combat, whilst others were integrated into the Unit or deployed by JCE members in operations where they were subordinated to, or operated in coordination with, Unit members under the Accused’s authority.<sup>1123</sup> The fighters trained by Unit members at the Accused’s training camps committed horrific crimes and were instrumental in murdering, persecuting, forcibly transferring, and deporting non-Serbs from Serb-claimed territories in Croatia and BiH.<sup>1124</sup> In his KOSTIĆ Centre speech,

<sup>1118</sup> BABIĆMilan:[P01246](#), T.13083-13086.

<sup>1119</sup> [1D01212](#); [2D00843](#).

<sup>1120</sup> [1D00057](#), p.73.

<sup>1121</sup> Cross-reference Section [II.D.2\(a\)\(i\)](#).

<sup>1122</sup> *Serbia Camps Decision*.

<sup>1123</sup> See e.g. [P00256](#)(00:16:20-00:16:41), p.11.

<sup>1124</sup> Cross-reference Section [II.D.2](#); Section [III.B-C](#).

**SIMATOVIĆ** credited the Unit's successes to the "high-quality professional training" provided at the Unit's training camps.<sup>1125</sup>

267. Focusing on the most notable examples, this Section demonstrates how the Accused's training camps significantly contributed to the CCP by training Serb Forces which JCE members deployed in joint expulsion operations where they committed the crimes charged in the Indictment.

(a) The Accused established training camps in Krajina to train Serb Forces which they used to advance the CCP in Krajina and throughout the Indictment area

(i) Golubić

268. Beginning in April 1991, the Accused established, financed, supplied, and managed the Golubić training camp in Knin,<sup>1126</sup> which became the cornerstone of the Accused's efforts to train Serb Forces that JCE members deployed to advance the CCP.<sup>1127</sup> Both Accused were significantly involved in establishing and managing Golubić; [REDACTED].<sup>1128</sup> **SIMATOVIĆ** was based at Golubić from April until August 1991<sup>1129</sup> and was "the person in charge of the camp, the boss".<sup>1130</sup> **STANIŠIĆ** financed the camp (with SMUP resources),<sup>1131</sup> and **SIMATOVIĆ** was charged with supplying what was needed, [REDACTED].<sup>1132</sup> **SIMATOVIĆ** provided weapons, vehicles, and equipment for training,<sup>1133</sup> allocated resources sent by others,<sup>1134</sup> [REDACTED].<sup>1135</sup> SerbianDB operative Uroš POKRAJAC<sub>(DB)</sub> delivered vehicles for Golubić from Kosovo.<sup>1136</sup>

<sup>1125</sup> [P00256](#)(00:13:40-00:13:56)(00:15:37-00:16:92), p.10-11.

<sup>1126</sup> [REDACTED]; BABIĆMilan:[P01243](#), para.22; [REDACTED]; NIELSENChristian:[P00850](#), para.177; RJS-07:T.24(27-Aug-2019); [REDACTED]. See [P00210](#)(00:00:00-00:01:30); [REDACTED].

<sup>1127</sup> [REDACTED]; [P00059](#)(01:06:19-01:06:44), p.25; [P00248](#), p.1-2; [REDACTED].

<sup>1128</sup> [REDACTED].

<sup>1129</sup> BABIĆMilan:[P01246](#), T.13106,13118-13119; [REDACTED]; BABIĆMilan:[P01248](#), T.1429; [REDACTED]; RFJ-066:T.29(10-Jul-2017); [REDACTED]; [P00247](#); [P00211](#); [P00843](#); NIELSENChristian:T.45-46(15-Nov-2017).

<sup>1130</sup> [REDACTED]. See BABIĆMilan:[P01246](#), T.13106,13121,13163-13164; BABIĆMilan:[P01248](#), T.1543; RFJ-066:T.28(10-Jul-2017); [REDACTED].

<sup>1131</sup> BABIĆMilan:[P01248](#), T.1545-1546; [REDACTED]; RFJ-066:T.28(10-Jul-2017); [REDACTED]. See [REDACTED].

<sup>1132</sup> [REDACTED].

<sup>1133</sup> [REDACTED]; [P00211](#).

<sup>1134</sup> [P00843](#); [P00047](#); MASKIĆRadoslav:[P00025](#), para.79.

<sup>1135</sup> [REDACTED].

<sup>1136</sup> [REDACTED]; [P00218](#). See [REDACTED].

269. At **STANIŠIĆ**'s behest, **SIMATOVIĆ** brought Dragan VASILJKOVIĆ aka Captain DRAGAN<sub>(DB)</sub>—who reported to the SerbianDB as Danijel SNEDDEN<sup>1137</sup>—to SAO-Krajina to lead the training at Golubić.<sup>1138</sup> **SIMATOVIĆ** also engaged Mark the Irishman aka IRAC, who the SerbianDB had recruited from abroad,<sup>1139</sup> and SerbianDB operatives [REDACTED] and FILIPOVIĆ<sub>(DB)</sub> to assist Captain DRAGAN<sub>(DB)</sub>.<sup>1140</sup> **SIMATOVIĆ** was a hands-on manager: he organised and directed the training,<sup>1141</sup> and helped plan the camp's day-to-day work, meeting with camp leadership to discuss offensive assignments, training, and forming units.<sup>1142</sup>

270. Between April and August 1991,<sup>1143</sup> Golubić instructors under **SIMATOVIĆ**'s command trained between 3,000 and 5,000 troops,<sup>1144</sup> including SAO-Krajina police,<sup>1145</sup> SAO-KrajinaTO,<sup>1146</sup> and volunteers from “all over the former Yugoslavia”.<sup>1147</sup> Recruits received specialised military training<sup>1148</sup> and were “taught to be a special force, an elite unit in combat skills”.<sup>1149</sup> There was also an “indoctrination element” to the training whereby recruits were “brainwash[ed]” to prioritise the Serb national interest above all else to “place [them] directly under the control of the Serbian State Security”.<sup>1150</sup>

271. **SIMATOVIĆ** [REDACTED],<sup>1151</sup> and selected “the smartest and most disciplined” Golubić trainees to form the nucleus of the Unit.<sup>1152</sup> The Unit was

<sup>1137</sup> [P00248](#), p.2; [REDACTED]. *Cross-reference* Section 2.D.1(a).

<sup>1138</sup> [P01962](#), p.2; [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.105; MAKSIĆRadoslav:T.74-75(22-Jun-2017); BABIĆMilan:[P01248](#), T.1540-1541,1543; [P00021](#), p.3. *See* [P01961](#), p.1; [P00059](#)(00:10:12-00:10:46), p.5; [P00247](#); [P00248](#); [P00250](#); [REDACTED]; RJS-07:T.26-28(27-Aug-2019).

<sup>1139</sup> VASILJEVIĆAleksandar:T.40(6-Feb-2019); [REDACTED]. *See* [REDACTED]; BABIĆMilan:[P01246](#), T.13502.

<sup>1140</sup> [P00250](#), p.1; [REDACTED]; RFJ-066:T.28-29(10-Jul-2017); BABIĆMilan:[P01246](#), T.13118,13502; [REDACTED].

<sup>1141</sup> BABIĆMilan:[P01246](#), T.13121; [REDACTED]; RFJ-066:T.3-4(24-Aug-2017). *See* [REDACTED]; [P01970](#).

<sup>1142</sup> [P00247](#); [REDACTED]; [P00248](#), p.2.

<sup>1143</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13119; BABIĆMilan:[P01248](#), T.1539,1541,1546. *See* [P00260](#), p.3; [P00261](#), p.5; [P00262](#), p.11.

<sup>1144</sup> *See e.g.* [REDACTED].

<sup>1145</sup> BABIĆMilan:[P01246](#), T.13119,13121; [REDACTED]; BABIĆMilan:[P01248](#), T.1541; [REDACTED]. *See* AF160.

<sup>1146</sup> [REDACTED].

<sup>1147</sup> *See e.g.* [REDACTED]; [P03469](#); [P02773](#), p.3; [P00247](#), p.1; [P00256](#)(00:14:22-00:14:41), p.10; [P02710](#), p.15,19; [REDACTED].

<sup>1148</sup> [REDACTED]; [P00247](#), p.2; [P00248](#), p.1.

<sup>1149</sup> [REDACTED].

<sup>1150</sup> [REDACTED]; [P00248](#), p.1. *See* RFJ-066:T.26(10-Jul-2017).

<sup>1151</sup> [REDACTED].

<sup>1152</sup> [REDACTED]. Unit members present at Golubić included Predrag BAKLAJIĆ<sub>(DB)</sub>; [REDACTED]; Radojica BOŽOVIĆ<sub>(DB)</sub>; Dragan FILIPOVIĆ<sub>(DB)</sub>; Živojin IVANOVIĆ<sub>(DB)</sub>; Bogoslav JANJATOVIĆ<sub>(DB)</sub>; [REDACTED]; Slobodan MAJSTOROVIĆ<sub>(DB)</sub>; [REDACTED]; Dragan OLUIĆ<sub>(DB)</sub>; Goran OPAČIĆ<sub>(DB)</sub>;

instrumental in the Accused's ongoing training efforts, establishing camps across Croatia, BiH, and Serbia to train and arm Serb Forces,<sup>1153</sup> which were deployed in ethnic cleansing operations to advance the CCP.<sup>1154</sup>

272. According to Captain DRAGAN<sub>(DB)</sub>, the "main goal" of the Golubić training programme was for trainees to "go home and establish mini polygons [...] where the new formations would grow".<sup>1155</sup> Thus, most Golubić trainees returned to their hometowns or local SAO-Krajina police stations, armed,<sup>1156</sup> to form and train additional units,<sup>1157</sup> which in turn participated in the persecutory campaign targeting non-Serbs, exponentially magnifying the significance of Accused's training contribution in advancing the CCP. As one Unit member reported: "many units were created from the Red Berets [...] all those who had received training from us, those who then went back to their places of origin, they made their own units based on what we taught them."<sup>1158</sup>

273. The Accused and MARTIĆ deployed the Golubić-trained forces in a pattern of targeted operations against non-Serbs in SAO-Krajina, during which crimes were committed, beginning in July 1991,<sup>1159</sup> including the attacks on Ljubovo,<sup>1160</sup> Glina police station as part of Operation Žaoka,<sup>1161</sup> Lovinac,<sup>1162</sup> Plitvice and Skradin,<sup>1163</sup> Kijevo,<sup>1164</sup> Hrvatska Kostajnica,<sup>1165</sup> Saborsko,<sup>1166</sup> and Škabrnja and Bruška,<sup>1167</sup> which were instrumental in furthering the CCP. Pursuing the Accused's intentions for their trainees—to drive out the non-Serb population—the earliest attacks were "assignments" requiring trainees to demonstrate their "skills...loyalty and courage" by, *inter alia*, targeting

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Nikola PILIPOVIĆ<sub>(DB)</sub>; Nikola PUPOVAC<sub>(DB)</sub>; Milan RADONJIĆ<sub>(DB)</sub>; Zoran RAIĆ<sub>(DB)</sub>; Nikola SIMIĆ<sub>(DB)</sub>; Davor SUBOTIĆ<sub>(DB)</sub>; Dragan VASILJKOVIĆ<sub>(DB)</sub>; Borjan VUČKOVIĆ<sub>(DB)</sub>; Ilija VUČKOVIĆ<sub>(DB)</sub>; [REDACTED], *cross-reference* AnnexA, *see e.g.* [P02861](#), p.1,8; [P02713](#), p.1; [P00262](#), p.11; [P02867](#), p.7; [P02868](#), p.21; [P02361](#), p.1; [P00500](#), p.16; [1D00629](#), p.16. *Cross-reference* Section [II.D.2\(a\)\(i\)](#).

<sup>1153</sup> *See e.g.* [REDACTED].

<sup>1154</sup> *See e.g.* [REDACTED]. *Cross-reference* Section [II.D.2\(a\)](#); Section [III.B-C](#).

<sup>1155</sup> [P00248](#), p.2. As proposed by Captain DRAGAN<sub>(DB)</sub>, many recruits returned to their hometowns after their training at one of the SMUP-sponsored training centres and established and trained combat units there, *see e.g.* [REDACTED]; [P00059](#)(01:06:19-01:06:44), p.25.

<sup>1156</sup> *See e.g.* [P03471](#), p.1-2; [P02533](#), p.1.

<sup>1157</sup> *See e.g.* [REDACTED]; [P00247](#), p.1; [P03082](#); [REDACTED]; [2D00139](#), p.1.

<sup>1158</sup> [P00059](#)(01:06:19-01:06:44), p.25.

<sup>1159</sup> BABIĆMilan:[P01246](#), T.13089,13091; BABIĆMilan:[P01248](#), T.1515; [REDACTED]. *Cross-reference* Section [III.C.1](#).

<sup>1160</sup> *Cross-reference* Section [II.D.2\(a\)\(i\)](#); Section [III.B.1\(b\)\(ii\)](#).

<sup>1161</sup> *Cross-reference* Section [II.D.2\(a\)\(i\)](#); Section [II.F.1\(c\)\(ii\)a](#); Section [III.B.1\(b\)\(i\)](#).

<sup>1162</sup> *Cross-reference* Section [II.F.1\(c\)\(ii\)c](#); Section [III.B.1\(b\)\(iii\)](#).

<sup>1163</sup> *Cross-reference* Section [II.2.D\(a\)\(i\)](#); Section [II.F.1\(c\)\(iii\)](#).

<sup>1164</sup> *Cross-reference* Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(c\)\(i\)](#).

<sup>1165</sup> *Cross-reference* Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(c\)\(ii\)](#).

<sup>1166</sup> *Cross-reference* Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(c\)\(iii\)](#).

Ljubovo with missiles, under the command of **SIMATOVIĆ** and Captain DRAGAN<sub>(DB)</sub>.<sup>1168</sup>

274. Other Golubić alumni advanced the CCP further afield, in SAO-SBWS and BiH. For example, Golubić trainees: joined ARKAN's SDG and participated in SAO-SBWS operations;<sup>1169</sup> formed the Wolves of Vučjak paramilitary, which returned to Prnjavor in BiH, "well armed",<sup>1170</sup> where they terrorised and persecuted the Muslim population and operated a detention centre for non-Serbs;<sup>1171</sup> [REDACTED].<sup>1172</sup>

275. The Golubić training camp—which **SIMATOVIĆ** recognised in his KOSTIĆ Centre speech<sup>1173</sup>—was such a successful contribution to the CCP that it became the model for camps the Accused rolled out in other areas of SAO-Krajina,<sup>1174</sup> as well as in SAO-SBWS,<sup>1175</sup> BiH,<sup>1176</sup> and Serbia.<sup>1177</sup> By the time Golubić ceased operating in August 1991,<sup>1178</sup> the Accused had expanded the Unit's training activities in SAO-Krajina by establishing camps at the Knin Fortress, Šamarica, and Korenica, from which they continued to train, command and deploy Serb Forces in operations to advance the CCP.

(ii) Knin Fortress

276. In May 1991, Captain DRAGAN<sub>(DB)</sub>, as the "chief training instructor",<sup>1179</sup> proposed that a new training centre be established in the Knin fortress to which a "special unit" would be transferred.<sup>1180</sup> In June or July 1991, at MARTIĆ's request, **STANIŠIĆ** had **SIMATOVIĆ** and Captain DRAGAN<sub>(DB)</sub> relocate from Golubić to the Knin fortress.<sup>1181</sup> **SIMATOVIĆ** and Captain DRAGAN<sub>(DB)</sub> took their best Unit recruits<sup>1182</sup> to

<sup>1167</sup> Cross-reference Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(c\)\(iv\)](#).

<sup>1168</sup> [REDACTED]; DRAČAAco:T.28(26-Nov-2019); [P01555](#); [P00261](#), p.5; [REDACTED]; [2D00089](#), p.1-2. See AF174; AF176; [REDACTED]. Cross-reference Section [II.F.1\(c\)\(ii\)b](#).

<sup>1169</sup> [P03065](#), p.2,4,7-8.

<sup>1170</sup> [P03471](#), p.1-2; [P02533](#), p.1.

<sup>1171</sup> [P03471](#), p.1-2; [P02533](#), p.1-2; [P02534](#); [REDACTED]; [P02381](#); [REDACTED]; RFJ-129:[P02505](#), T.18376; RFJ-129:T.8,10(3-Jul-2018). See AF841.

<sup>1172</sup> [REDACTED]. Cross-reference Section [III.C.6\(b\)](#).

<sup>1173</sup> [P00256](#)(00:15:48-00:16:18), p.11. See [P00537](#)(00:00:53-00:01:03), p.2; [REDACTED]. See AnnexB.

<sup>1174</sup> Cross-reference Section [II.E.4\(a\)\(ii\)](#)-(iv). See e.g. [P00256](#)(00:15:48-00:16:18), p.11; [P00210](#)(00:00:00-00:01:30).

<sup>1175</sup> Cross-reference Section [II.E.4\(b\)](#). See e.g. [P00256](#)(00:15:48-00:16:18), p.11.

<sup>1176</sup> Cross-reference Section [II.E.4\(c\)](#)-(d). See e.g. [P00256](#)(00:15:48-00:16:18), p.11.

<sup>1177</sup> Cross-reference Section [II.E.4\(b\)\(ii\)](#); Section [II.E.4\(d\)\(iv\)](#). See e.g. [P00256](#)(00:15:48-00:16:18), p.11.

<sup>1178</sup> BABIĆMilan:[P01246](#), T.13119; BABIĆMilan:[P01248](#), T.1546.

<sup>1179</sup> [P00021](#), p.3.

<sup>1180</sup> [P00011](#); [REDACTED].

<sup>1181</sup> [REDACTED]; RFJ-066:T.34-35(10-Jul-2017); [REDACTED]; BABIĆMilan:[P01248](#), T.1437; [P00211](#); [P00249](#), p.1. See [P00537](#)(00:00:53-00:01:03), p.2; [REDACTED]; [P00210](#)(00:00:00-00:01:30).

the Knin fortress, further training them as instructors,<sup>1183</sup> and trained members of the police command structure, among others.<sup>1184</sup> From the Knin fortress, the Unit participated in operations furthering the CCP across the SAO-Krajina, together with other Golubić-trained forces,<sup>1185</sup> prior to being deployed to new training camps in the SAO-Krajina, SAO-SBWS, and BiH to prepare local Serb fighters to advance the CCP.<sup>1186</sup>

(iii) Šamarica

277. In June 1991,<sup>1187</sup> through the “parallel structure”,<sup>1188</sup> the Accused established an additional training camp in Šamarica—featuring in **SIMATOVIĆ**’s KOSTIĆ Centre speech<sup>1189</sup>—to train and arm SAO-Krajina special police and TO units.<sup>1190</sup> From the Šamarica training camp, Serb Forces, including the Unit,<sup>1191</sup> the SAO-Krajina TO, and SAO-Krajina police, commanded by Captain DRAGAN<sub>(DB)</sub>, under the control of **SIMATOVIĆ**, participated in the Operation Žaoka attacks, expelling non-Serbs from Glina and Struga.<sup>1192</sup>

(iv) Korenica

278. [REDACTED] **SIMATOVIĆ**, together with [REDACTED] original Unit members<sup>1193</sup>—“Frenki’s men”—established a new “large-scale” training camp in

<sup>1182</sup> Unit members present at the Knin fortress included [REDACTED]; Živojin IVANOVIĆ<sub>(DB)</sub>; Jovan KUJUNDŽIĆ<sub>(DB)</sub>; [REDACTED]; Nikola PILIPOVIĆ<sub>(DB)</sub>; Nikola PUPOVAC<sub>(DB)</sub>; [REDACTED]; Dragan VASILJKOVIĆ<sub>(DB)</sub>; Borjan VUČKOVIĆ<sub>(DB)</sub>; [REDACTED], *cross-reference* AnnexA, *see e.g.* [REDACTED]; [P00264](#), p.13,20; [P00500](#), p.16; [REDACTED].

<sup>1183</sup> [P00059](#)(Clip 1, 00:31:12-00:31:42), p.8; [P00271](#)(00:00:00-00:00:06), p.1; [P01970](#)(00:00:30-00:00:40); [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.117; [P00021](#), p.3. *See* BABIĆMilan:[P01246](#), T.13162.

<sup>1184</sup> [REDACTED].

<sup>1185</sup> *Cross-reference* Section [II.D.2\(a\)\(i\)](#).

<sup>1186</sup> *See e.g.* [REDACTED]; RFJ-066:T.40-41(10-Jul-2017); [REDACTED]; [P03063](#), p.2; [P00059](#)(01:06:19-01:06:44), p.25; [P00271](#)(00:00:00-00:00:06), p.1.

<sup>1187</sup> [P03416](#), p.2; [1D00813](#), p.1; [P03401](#); [P03402](#), p.1.

<sup>1188</sup> [P03416](#), p.3(VAJAGIĆ commanded the Dvor na Uni war staff, founded in Šamarica, which appointed a centre for training special units); BABIĆMilan:[P01246](#), T.13383,13388(Bogdan VAJAGIĆ commanded the 7<sup>th</sup> Banija Division, which reported through the parallel structure to SIMATOVIĆ and had a headquarters at Šamarica); [REDACTED].

<sup>1189</sup> [P00256](#)(00:15:48-00:16:18), p.11. *See* AnnexB.

<sup>1190</sup> [1D00813](#); NIELSENChristian:[P00850](#), para.180; BABIĆMilan:[P01246](#), T.13119-13121,13388; [REDACTED]; BABIĆMilan:[P01248](#), T.1539,1546; [P01963](#); THEUNENSReynaud:T.21-22(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.226; [2D00139](#), p.1; [P03233](#). *See* [P03401](#); [P03402](#), p.1.

<sup>1191</sup> Unit members present at Šamarica included: Živojin IVANOVIĆ<sub>(DB)</sub>; Nikola PUPOVAC<sub>(DB)</sub>; Dragan VASILJKOVIĆ<sub>(DB)</sub>; [REDACTED], *cross-reference* AnnexA.

<sup>1192</sup> *See e.g.* [P03233](#); [1D00047](#), p.1; THEUNENSReynaud:T.26-27(7-Mar-2018); [REDACTED]; [2D00139](#), p.1; [P03233](#). *See* AF178. *Cross-reference* Section [II.D.2\(a\)\(i\)](#); Section [II.F.1\(c\)\(ii\)a](#); Section [III.B.1\(b\)\(i\)](#).

<sup>1193</sup> Unit members present at Korenica included: Dragan FILIPOVIĆ<sub>(DB)</sub>; [REDACTED]; Nikola PILIPOVIĆ<sub>(DB)</sub>; Zoran RAIĆ<sub>(DB)</sub>; Nikola SIMIĆ<sub>(DB)</sub>; [REDACTED], *cross-reference* AnnexA.



Korenica, near Plitvice,<sup>1194</sup> acknowledged in **SIMATOVIĆ**'s KOSTIĆ Centre speech.<sup>1195</sup> The SerbianDB financed the camp.<sup>1196</sup> **SIMATOVIĆ** and FILIPOVIĆ<sub>(DB)</sub> trained local recruits and SAO-Krajina police.<sup>1197</sup> The units trained at Korenica operated under **SIMATOVIĆ**'s direct command alongside the JNA in forcibly expelling the civilian population in Lika, including through operations in Saborsko.<sup>1198</sup>

(b) The Accused established training camps in SAO-SBWS and Serbia to train Serb Forces, which JCE members used to advance the CCP throughout SAO-SBWS and BiH

(i) Tikveš

279. Captain DRAGAN<sub>(DB)</sub> expanded the Unit's training activities into SAO-SBWS, establishing a training camp in TITO's Castle, near Tikveš, around early August 1991.<sup>1199</sup> At Tikveš, Captain DRAGAN<sub>(DB)</sub> and Unit members under his command<sup>1200</sup> trained local Serb forces, [REDACTED].<sup>1201</sup> [REDACTED], these Unit members and Serb Forces they had trained deployed into operations in and around Tikveš in 1991, including the attack on Bilje, and committed numerous crimes against non-Serbs.<sup>1202</sup> Unit members remained at Tikveš until at least June 1992,<sup>1203</sup> terrorising, murdering and committing other "horrendous atrocities" against the non-Serb population in the area, furthering the CCP.<sup>1204</sup>

<sup>1194</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13397; MAKSIĆRadoslav:[P00025](#), para.23; MAKSIĆRadoslav:T.67(22-Jun-2017); MAKSIĆRadoslav:[P00025](#), para.23,75-77.

<sup>1195</sup> [P00256](#)(00:15:48-00:16:18), p.11. See [P00537](#)(00:00:49-00:00:52), p.2; [REDACTED]. See AnnexB.

<sup>1196</sup> [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.23,75-77. See BABIĆMilan:[P01246](#), T.13397; [REDACTED].

<sup>1197</sup> [P03417](#), p.2.

<sup>1198</sup> See e.g. [REDACTED];[REDACTED]; RFJ-066:T.5(24-Aug-2017); [REDACTED]; THEUNENSReynaud:T.29-30(7-Mar-2018). See [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.107. Cross-reference Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(c\)\(iii\)](#).

<sup>1199</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13128. See [P02704](#), p.21. Section [II.D.1\(a\)](#); Section [II.F.2\(f\)\(ii\)c](#).

<sup>1200</sup> Unit members present at Tikveš included: [REDACTED]; Dragan VASILJKOVIĆ<sub>(DB)</sub>, cross-reference AnnexA, see e.g. [P02704](#), p.21.

<sup>1201</sup> [REDACTED].

<sup>1202</sup> Cross-reference Section [II.F.\(2\)\(f\)\(ii\)c](#); Section [II.F.\(2\)\(h\)\(ii\)](#); Section [III.B.2\(b\)\(ii\)](#).

<sup>1203</sup> [REDACTED]; [P00529](#). See BABIĆMilan:[P01246](#), T.13128; [P02831](#), p.1; [P02704](#), p.19-21; [P00500](#), p.16.

<sup>1204</sup> [P00164](#), p.3,5. Cross-reference Section [III.B.2\(b\)\(ii\)](#); Section [III.B.2\(d\)](#).



(ii) Ležimir (Fruška Gora)

280. In September 1991, **SIMATOVIĆ** transferred Unit members from Golubić and Korenica<sup>1205</sup> to a training camp on Mt. Fruška Gora in Serbia, near the SBWS border.<sup>1206</sup> The camp was principally based in a hotel in Ležimir, but had a second base in nearby Letenka.<sup>1207</sup> In his KOSTIĆ Centre speech, **SIMATOVIĆ** highlighted the “high quality professional training” the Unit organised at the Ležimir camp.<sup>1208</sup> [REDACTED].<sup>1209</sup> Under the direct command of IVANOVIĆ<sub>(DB)</sub> and his deputy BOŽOVIĆ<sub>(DB)</sub>,<sup>1210</sup> Golubić-trained Unit members trained men from BiH and Serbia, [REDACTED].<sup>1211</sup> [REDACTED].<sup>1212</sup>

281. The Accused ensured that the Unit at Ležimir was fully armed and equipped.<sup>1213</sup> [REDACTED],<sup>1214</sup> and the camp had a “supply dump” containing equipment and weapons.<sup>1215</sup> [REDACTED].<sup>1216</sup> SerbianDB drivers delivered equipment [REDACTED] to Ležimir.<sup>1217</sup>

282. After completing training, some trainees returned to their towns and villages to train and mobilise others,<sup>1218</sup> spreading the training programme initiated at Golubić.

<sup>1205</sup> Unit members present at Ležimir included: [REDACTED]; Radojica BOŽOVIĆ<sub>(DB)</sub>; Milan DIMIĆ<sub>(DB)</sub>; [REDACTED]; [REDACTED]; Živojin IVANOVIĆ<sub>(DB)</sub>; Jovan KUJUNDŽIĆ<sub>(DB)</sub>; Nikola LONČAR<sub>(DB)</sub>; [REDACTED]; Ljubomir OBRADOVIĆ<sub>(DB)</sub>; [REDACTED]; Nikola PILIPOVIĆ<sub>(DB)</sub>; Nikola PUPOVAC<sub>(DB)</sub>; [REDACTED]; Zoran RAIĆ<sub>(DB)</sub>; Predrag SPASOJEVIĆ<sub>(DB)</sub>; [REDACTED]; Borjan VUČKOVIĆ<sub>(DB)</sub>; Ilija VUČKOVIĆ<sub>(DB)</sub>; Aleksandar VUKOVIĆ<sub>(DB)</sub>; Budimir ZEČEVIĆ<sub>(DB)</sub>, *cross-reference* AnnexA, *see e.g.* [P02704](#), p.21; [P02707](#), p.10; [REDACTED]; [P02709](#), p.8; [P02712](#), p.11; [P02717](#), p.27; [P02817](#), p.4; [P02821](#), p.1; [P02045](#), p.3; [P02828](#), p.1; [P02831](#), p.8-9; [P00500](#), p.4,16,36; [P02835](#), p.3; [REDACTED]; [P02849](#), p.2; [REDACTED].

<sup>1206</sup> [P00059](#)(00:53:56-00:54:17)(01:05:33-01:05:49), p.19,25; [REDACTED]; [P00256](#)(00:15:37-00:16:92), p.10-11; [REDACTED]; VASILJEVIĆAleksandar:T.20,31-32(31-Jan-2019); [P03036](#), p.2. *See* NIELSENChristian:[P00850](#), para.190. *Cross-reference* Section [II.D.2\(a\)\(ii\)](#); Section [II.F.2\(f\)\(ii\)a](#). *See* *Serbia Camps Decision*.

<sup>1207</sup> [REDACTED]; [P00059](#), p.19,25; [P00256](#)(00:15:37-00:16:92), p.10-11; [REDACTED]; [P00260](#), p.23-24,31;[REDACTED] [P02704](#), p.21; [P00500](#), p.4,16,36; [REDACTED].

<sup>1208</sup> [P00256](#)(00:15:37-00:16:92), p.10-11; [REDACTED].

<sup>1209</sup> [REDACTED]. *Cross-reference* Section [II.D.2\(a\)\(ii\)](#).

<sup>1210</sup> [REDACTED]; [P00260](#), p.4,34; VASILJEVIĆAleksandar:T.20-21(31-Jan-2019). *See* [P03036](#), p.2; [REDACTED].

<sup>1211</sup> [REDACTED]; [P02045](#), p.3; [REDACTED]. *See e.g.* [P00845](#), p.15,18,20; [P02874](#), p.5-7; [REDACTED]; [P02709](#), p.6,8.

<sup>1212</sup> [REDACTED][P02045](#), p.3; [REDACTED].

<sup>1213</sup> [REDACTED]. *See* [P00265](#), p.5-6; [REDACTED]; [P02831](#), p.18; [P00259](#), p.11; [P00553](#), p.34; [P02296](#), p.23.

<sup>1214</sup> [REDACTED].

<sup>1215</sup> [P00260](#), p.31.

<sup>1216</sup> [REDACTED].

<sup>1217</sup> [REDACTED]; [P00260](#), p.32.

<sup>1218</sup> [REDACTED].

These men later operated in coordination with the VRS or local municipal leaders or Crisis Staffs in BiH.<sup>1219</sup> Other Ležimir trainees deployed with the Unit, under the Accused's command,<sup>1220</sup> in ethnic cleansing operations across the border in SAO-SBWS, including in Bilje, Bapska, Ilok, Šarengrad and Tikveš,<sup>1221</sup> and in BiH.<sup>1222</sup>

(iii) Pajzoš (Ilok)

283. By November 1991, after driving the non-Serb population from Bapska and surrounding villages, the Unit<sup>1223</sup> established a training camp at Pajzoš,<sup>1224</sup> [REDACTED].<sup>1225</sup> The camp was located on a hill overlooking Ilok in a villa and winery formerly used by TITO,<sup>1226</sup> secured by a minefield.<sup>1227</sup> STANIŠIĆ and SIMATOVIĆ, who acknowledged the Unit's "Ilok" training camp in his KOSTIĆ Centre speech,<sup>1228</sup> were at the camp on several occasions.<sup>1229</sup>

284. At Pajzoš, Unit instructors under the command of IVANOVIĆ<sub>(DB)</sub> and BOŽOVIĆ<sub>(DB)</sub><sup>1230</sup> provided training on sabotage and terrorism, [REDACTED],<sup>1231</sup> and trainees received weapons, equipment, and [REDACTED] uniforms [REDACTED].<sup>1232</sup>

<sup>1219</sup> [REDACTED].

<sup>1220</sup> [REDACTED]. *Cross-reference* Section [II.D.2\(a\)\(ii\)](#)-(iv).

<sup>1221</sup> See e.g. [REDACTED]; [P00500](#), p.16; [P00261](#), p.5. *Cross-reference* Section [II.F.2\(f\)\(ii\)](#); Section [III.B.2\(b\)\(ii\)](#)-(iv).

<sup>1222</sup> *Cross-reference* Section [II.D.2\(a\)\(iii\)](#)-(iv); Section [II.F.4\(b\)\(ii\)a.iv-v](#).

<sup>1223</sup> Unit members present at Pajzoš included: Predrag BAKLAJIĆ<sub>(DB)</sub>; Radojica BOŽOVIĆ<sub>(DB)</sub>; Dragan ĐORĐEVIĆ<sub>(DB)</sub>; Dragan FILIPOVIĆ<sub>(DB)</sub>; Živojin IVANOVIĆ<sub>(DB)</sub>; Zvezdan JOVANOVIĆ<sub>(DB)</sub>; Jovan KUJUNDŽIĆ<sub>(DB)</sub>; Predrag LAZAREVIĆ<sub>(DB)</sub>; [REDACTED]; Ljubomir OBRADOVIĆ<sub>(DB)</sub>; Nikola PILIPOVIĆ<sub>(DB)</sub>; Nikola PUPOVAC<sub>(DB)</sub>; Srećko RADOVANOVIĆ<sub>(DB)</sub>; Zoran RAIĆ<sub>(DB)</sub>; Nikola SIMIĆ<sub>(DB)</sub>; [REDACTED]; Darko TORBICA<sub>(DB)</sub>; Borjan VUČKOVIĆ<sub>(DB)</sub>; Aleksandar VUKOVIĆ<sub>(DB)</sub>, *cross-reference* AnnexA, see e.g. [P02704](#), p.21; [REDACTED]; [P02596](#), p.24; [P02866](#), p.1; [P02570](#), p.10; [P00500](#), p.16; [P00266](#), p.8; [REDACTED]; [P02844](#), p.6; [1D00407](#), p.1; [REDACTED].

<sup>1224</sup> [REDACTED]; [P00261](#), p.5; BOGUNOVIĆBorislav:[P02718](#), para.24; BOGUNOVIĆBorislav:[P02720](#), T.5998-5999; THEUNENSReynaud:[P01980](#), p.184; [REDACTED]; [P00500](#), p.16; [P00258](#), p.11; [P00260](#), p.1,5,13,23,27,29,31. See [2D00143](#), p.2. *Cross-reference* Section [II.F.2\(f\)\(ii\)b](#).

<sup>1225</sup> [REDACTED].

<sup>1226</sup> BOGUNOVIĆBorislav:[P02719](#), para.9; BOGUNOVIĆBorislav:[P02718](#), para.24; BOGUNOVIĆBorislav:[P02720](#), T.6074; [REDACTED]; [REDACTED]; [REDACTED]. The Unit also had a building in Ilok. See BOGUNOVIĆBorislav:[P02718](#), para.24; BOGUNOVIĆBorislav:[P02720](#), T.6074.

<sup>1227</sup> [P00260](#), p.24,29; [REDACTED]; PLAHUTADejan:T.65(19-Nov-2019). *Cross-reference* Section [II.F.2\(f\)\(ii\)b](#).

<sup>1228</sup> [P00256](#)(00:15:48-00:16:18), p.11. *Cross-reference* AnnexB.

<sup>1229</sup> *Cross-reference* Section [II.D.2\(a\)\(ii\)](#).

<sup>1230</sup> [P00260](#), p.1,4,23-24,29-30,32,34[REDACTED]; [P00258](#), p.11,13 ; [P00265](#), p.9. *Cross-reference* Section [II.D.2\(a\)\(ii\)](#).

<sup>1231</sup> [P02844](#), p.6; [REDACTED]; RFJ-035:T.46(18-Apr-2018).

<sup>1232</sup> [REDACTED]; [1D00407](#), p.1,5.

285. Unit instructors trained recruits from Serbia, Croatia, and BiH,<sup>1233</sup> including members of the Šid (Serbia), SAO-SBWS, and Skelani TO;<sup>1234</sup> police from Krajina;<sup>1235</sup> Banja Luka DB members;<sup>1236</sup> local Serbs from Bosanski Šamac;<sup>1237</sup> [REDACTED]; and others.<sup>1238</sup> After completing training, trainees employed their new skills committing crimes in multiple operations in BiH in coordination with Unit members and other Serb Forces. For example, after training at Pajzoš: Slobodan MILJKOVIĆ aka LUGAR<sub>(DB)</sub> and Srećko RADANOVIĆ aka DEBELI<sub>(DB)</sub> and their cohort deployed into Bosanski Šamac<sup>1239</sup> where they played a critical role in expelling the non-Serb population;<sup>1240</sup> members of the JNA 63<sup>rd</sup> parachute brigade deployed into the Podrinje scorched-earth campaign;<sup>1241</sup> and Milan LUKIĆ and members of his paramilitary unit from Višegrad<sup>1242</sup> [REDACTED], and murdered Muslim civilians from Sjeverin and Štrpci in furtherance of the CCP.<sup>1243</sup> [REDACTED].<sup>1244</sup>

286. The Pajzoš camp continued to operate throughout the Indictment period, with training activities intensifying from at least June 1995.<sup>1245</sup> [REDACTED].<sup>1246</sup> Unit members conducted “extreme modes” of physical and theoretical training at the Pajzoš camp and in the nearby forest, including anti-terrorist training, “silent liquidations”, [REDACTED].<sup>1247</sup> Trainees were provided with weapons, uniforms and berets.<sup>1248</sup> From Pajzoš, the newest Unit members deployed to further training camps in Mt. Tara, Zirište, Lipovica and Kula and supported operations in Eastern Slavonia to maintain cleansed territory in furtherance of the CCP.<sup>1249</sup>

<sup>1233</sup> [P00500](#), p.3,16; THEUNENSReynaud:[P01980](#), p.185.

<sup>1234</sup> [P02704](#), p.2,5,21; [REDACTED].

<sup>1235</sup> [1D00407](#), p.1.

<sup>1236</sup> [P03513](#), p.4; [REDACTED].

<sup>1237</sup> [REDACTED]; THEUNENSReynaud:[P01980](#), p.185; [P00846](#), p.3; [P01953](#), p.2.

<sup>1238</sup> [REDACTED].

<sup>1239</sup> THEUNENSReynaud:[P01980](#), p.185; [REDACTED]; [P02040](#), p.1; [REDACTED]; [P00845](#), p.4-6,14-15,18,20; [P00846](#), p.3; [P01953](#), p.2; [REDACTED]. *Cross-reference* Section [II.F.4\(b\)\(ii\)a.ii](#),iv; Section [II.F.4\(b\)\(ii\)a.iv](#).

<sup>1240</sup> *See e.g.* THEUNENSReynaud:[P01980](#), p.185; DERONJIĆMiroslav:[P01717](#), para.63. *Cross-reference* [II.F.4\(b\)\(ii\)a.iv](#)-v; Section [III.C.3](#).

<sup>1241</sup> [P02570](#), p.2,9-10.

<sup>1242</sup> [REDACTED]; [P00265](#), p.9.

<sup>1243</sup> [REDACTED]; [1D00348](#); [REDACTED]; [REDACTED]; STEVANOVIĆObrad:T.39-42(22-Sep-2020); STEVANOVIĆObrad:T.19(30-Sep-2020); [REDACTED].

<sup>1244</sup> [REDACTED].

<sup>1245</sup> [REDACTED]; [P03513](#), p.4. *See* [P00166](#); WILSONJohn:T.63-64(27-Jun-2017).

<sup>1246</sup> [REDACTED].

<sup>1247</sup> [REDACTED]; KRSMANOVIĆDragoslav:[1D00384](#), para.57; RFJ-150:T.24-25,59-60(22-May-2018).

<sup>1248</sup> [REDACTED]; STOPARIĆGoran:T.16(8-Nov-2017); [REDACTED].

<sup>1249</sup> [REDACTED].

(c) The Accused established training camps in BiH to train Serb Forces used to advance the CCP along the Posavina Corridor in BiH

287. Following a series of communications between **STANIŠIĆ**, **SIMATOVIĆ** and **KARADŽIĆ** in late 1991 and early 1992,<sup>1250</sup> the Accused established training camps across BiH in the areas targeted by what would later be declared as the Six Strategic Goals.<sup>1251</sup>

(i) Brčko

288. In February 1992, Unit members<sup>1252</sup> established a camp in Brčko to train local Serbs in advance of the Posavina Corridor operations.<sup>1253</sup> At the Brčko camp—which **SIMATOVIĆ** recognised in his **KOSTIĆ** Centre speech<sup>1254</sup>—Unit members under the Accused’s authority<sup>1255</sup> trained reservists of the former JNA and a “large number” of Brčko residents and established a “special unit” which grew to some 70 members.<sup>1256</sup> This special unit was “well trained, equipped, and [...] the strongest unit in Brčko”.<sup>1257</sup> **SIMATOVIĆ** subsequently sent **IVANOVIĆ**<sub>(DB)</sub> to Brčko [REDACTED].<sup>1258</sup> **IVANOVIĆ**<sub>(DB)</sub> selected Brčko locals to be trained by Unit members and join his unit.<sup>1259</sup> From 30 April 1992, locally recruited trainees joined Unit members and paramilitary groups in persecutory operations in and around Brčko, which were critical to the JCE members’ implementation of the First and Second Strategic Goals, in furtherance of the CCP.<sup>1260</sup>

<sup>1250</sup> [P02780](#), p.1-2; [P01505](#), p.3; [P02793](#), p.3-8. See [P02773](#), p.3-4. Cross-reference Section [II.F.4](#); Section [II.F.4-\(a\)\(ii\)a](#).

<sup>1251</sup> Section [II.A.2\(a\)](#); Section [II.F.4\(a\)](#); Section [II.F.4\(a\)\(ii\)c](#).

<sup>1252</sup> Unit members present at Brčko included: Božo BOŽIĆ<sub>(DB)</sub>; Rade BOŽIĆ<sub>(DB)</sub>; Živojin IVANOVIĆ<sub>(DB)</sub>; [REDACTED]; Dragan VASILJKOVIĆ<sub>(DB)</sub>, cross-reference AnnexA, see e.g. [REDACTED].

<sup>1253</sup> [1D00034](#), p.3; [P03279](#), p.5; [REDACTED]; STOPARIĆGoran:T.31-32(7-Nov-2017); STOPARIĆGoran:[P00796](#), para.61; THEUNENSReynaud:[P01980](#), p.486. Cross-reference Section [II.D.2\(a\)\(iii\)b](#).

<sup>1254</sup> [P00256](#)(00:15:37-00:16:92), p.10. See AnnexB.

<sup>1255</sup> [REDACTED].

<sup>1256</sup> [1D00034](#), p.3; [P03279](#), p.5; [REDACTED]; THEUNENSReynaud:[P01980](#), p.486; [P03039](#), p.5; [2D00157](#), p.2,4; [P03149](#), p.3,4-5. See STOPARIĆGoran:T.31-32(7-Nov-2017); STOPARIĆGoran:[P00796](#), para.61.

<sup>1257</sup> STOPARIĆGoran:T.31-32(7-Nov-2017); STOPARIĆGoran:[P00796](#), para.61. See [REDACTED].

<sup>1258</sup> [REDACTED]; [2D00089](#), p.10; [P01949](#), p.2.

<sup>1259</sup> STOPARIĆGoran:[P00796](#), para.61; STOPARIĆGoran:T.11(9-Nov-2017); STOPARIĆGoran:T.14-15(30-Nov-2017); [REDACTED]; [P02045](#), p.2.

<sup>1260</sup> Cross-reference Section [II.D.2\(a\)\(iii\)b](#); Section [II.F.4b\(ii\)b](#).

(ii) Mt. Ozren and Doboj (“Vila”)

289. In April 1992, BOŽOVIĆ<sub>(DB)</sub> and fellow Unit members under the Accused’s command established a training camp on Mt. Ozren,<sup>1261</sup> where they trained some 2,000 men in the area of Ozren, Doboj and Teslić in BiH, who became the “mainstay” in operations to remove non-Serbs along the Posavina Corridor in 1992 in pursuit of the First and Second Strategic Goals.<sup>1262</sup> The SerbianDB [REDACTED] to train members of the Doboj police, JNA, and local Serb volunteers at the Mt. Ozren camp,<sup>1263</sup> including numerous local Serb paramilitaries—[REDACTED], Predo’s Wolves, and others.<sup>1264</sup> Trainees were indoctrinated with the belief that they “had to remove all Muslims from the area”<sup>1265</sup> [REDACTED].<sup>1266</sup> Upon completing their training, trainees received camouflage uniforms and red berets [REDACTED].<sup>1267</sup> [REDACTED],<sup>1268</sup> and SIMATOVIĆ recognised the camp in his KOSTIĆ Centre speech.<sup>1269</sup>

290. Soon after the Doboj takeover on 3 May 1992, during which crimes were committed,<sup>1270</sup> the Unit<sup>1271</sup> established another camp—also recognised by SIMATOVIĆ in his KOSTIĆ Centre speech<sup>1272</sup>—at the exit of Doboj town, in an area known as “Vila”,<sup>1273</sup> where Unit members trained local recruits.<sup>1274</sup> Most recruits underwent training at both the Doboj and Mt. Ozren camps<sup>1275</sup> prior to being integrated in special

<sup>1261</sup> [P02388](#); [P01168](#), p.3; [P01170](#), p.2; [P02374](#), p.3-4; [REDACTED]; [P02368](#); [P02369](#); [P02370](#); [REDACTED]; [P01171](#); [P03543](#), p.2; THEUNENSReynaud:[P01980](#), p.499-500; THEUNENSReynaud:T.61(6-Mar-2018); [P00500](#), p.16;[REDACTED]. See HADŽOVIĆEdin:[P02009](#), p.2; HADŽOVIĆEdin:[P02011](#), T.2220. Cross-reference Section [II.D.2\(a\)\(iii\)c.](#)

<sup>1262</sup> [P00500](#), p.16. [REDACTED].

<sup>1263</sup> Cross-reference Section [II.F.4\(b\)\(ii\)c.ii.](#)

<sup>1264</sup> [REDACTED] [P02367](#), p.4; [REDACTED]; [P03594](#), p.4.

<sup>1265</sup> [REDACTED]; RFJ-165:T.13(29-May-2018).

<sup>1266</sup> [REDACTED]; RFJ-165:T.13(29-May-2018). [REDACTED]. See also HADŽOVIĆEdin:[P02009](#), para.3,7-8.

<sup>1267</sup> [REDACTED]; RFJ-165:T.13(29-May-2018); [P00780](#).

<sup>1268</sup> [REDACTED].

<sup>1269</sup> [P00256](#)(00:15:48-00:16:18), p.11; [REDACTED]. See [P00537](#)(00:00:27-00:00:31), p.1; [REDACTED]. See AnnexB.

<sup>1270</sup> Cross-reference Section [II.D.2\(a\)\(iii\)c.](#); Section [II.F.4\(b\)\(ii\)c.iii-iv](#); Section [III.C.4.](#)

<sup>1271</sup> Unit members present at Mt.Ozren/Doboj included Đurica BANJAC<sub>(DB)</sub>; Radojica BOŽOVIĆ<sub>(DB)</sub>; Milan DIMIĆ<sub>(DB)</sub>; Nedeljko DRAČA<sub>(DB)</sub>; Slobodan KARAGIĆ<sub>(DB)</sub>; Predrag KUJUNDŽIĆ<sub>(DB)</sub>; Njegoslav KUŠIĆ<sub>(DB)</sub>; Nikola LONČAR<sub>(DB)</sub>; Davor SUBOTIĆ<sub>(DB)</sub>; FNU VUKMIROVIĆ<sub>(DB)</sub>, cross-reference AnnexA, see e.g. [REDACTED]; [P00500](#), p.16. See also [P01950](#); [P01171](#); [P01172](#); [P01173](#).

<sup>1272</sup> [P00256](#)(00:15:48-00:16:18), p.11. See [P00537](#)(00:00:27-00:00:31), p.1; [REDACTED].

<sup>1273</sup> [REDACTED]; RFJ-165:T.17(29-May-2018); [REDACTED].

<sup>1274</sup> [REDACTED]; HADŽOVIĆEdin:[P02011](#), T.2297; HADŽOVIĆEdin:T.13-15,20(28-Mar-2018).

<sup>1275</sup> [REDACTED].

Red Beret units and deploying under BOŽOVIĆ<sub>(DB)</sub>'s command in expulsion operations along the Posavina Corridor, during which they committed heinous crimes.<sup>1276</sup>

(d) The Accused established training camps in BiH and Serbia to train Serb Forces which they used to advance the CCP in Eastern BiH

(i) Divič

291. Following the takeover of Zvornik in April 1992, Captain DRAGAN<sub>(DB)</sub> arrived in the demolished town of Divič, in Zvornik municipality, and “cleared it” within ten days.<sup>1277</sup> By June 1992, Captain DRAGAN<sub>(DB)</sub> had established a “Special Purpose Troops’ Training centre” in Divič,<sup>1278</sup> under the auspices of the Serbian MUP,<sup>1279</sup> with the approval of the Eastern Bosnia Corps Commander, and the support of KARADŽIĆ.<sup>1280</sup> The Divič training camp was located at the Vidikovac motel on the bank of the Drina river.<sup>1281</sup> Captain DRAGAN<sub>(DB)</sub> and Unit members from Knin were the camp’s instructors.<sup>1282</sup> According to Captain DRAGAN<sub>(DB)</sub>, 2,000 men could be trained at the Divič camp at any given time.<sup>1283</sup>

292. The Divič camp provided training for VRS units<sup>1284</sup> and “a larger number of persons criminally inclined, [...] prone to robbery, terror, rapes”.<sup>1285</sup> Following the completion of their training, VRS trainees returned to their units and employed their new skills in operations in the Podrinje.<sup>1286</sup> On 23 June 1992, MLADIĆ directed that a

<sup>1276</sup> Cross-reference Section [II.D.2\(a\)\(iii\)c](#); Section [II.F.4\(b\)\(ii\)c.iii](#)-iv; Section [III.C.4\(b\)-\(d\)](#).

<sup>1277</sup> [P02888](#), p.266-267.

<sup>1278</sup> [P03583](#); [REDACTED]; MILOVANOVIĆManojlo:[P02935](#), T.15373; NIELSENChristian:[P00850](#), p.215; See NIELSENChristian, T.69(23-Nov-2017).

<sup>1279</sup> [P01949](#), p.2; THEUNENSReynaud:T.66(6-Mar-2018); THEUNENSReynaud:T.76-78(14-Mar-2018); THEUNENSReynaud:T.12(15-Mar-2018); NIELSENChristian:[P00850](#), p.215; NIELSENChristian:T.69(23-Nov-2017); [REDACTED]. See [P02780](#); [P01505](#), p.3.

<sup>1280</sup> [P02888](#), p.215-216,246-247,250,252,263-270; MILOVANOVIĆManojlo:[P02934](#), T.4381; MILOVANOVIĆManojlo:[P02935](#), T.15373,15376-15377,15379-15380; [2D00083](#), p.5; [REDACTED].

<sup>1281</sup> [REDACTED]; [2D00083](#), p.5.

<sup>1282</sup> Stanišić “accept[s], there is no dispute Captain Dragan had a training centre with Red Berets at the Divič training centre”: THEUNENSReynaud:T.78(14-Mar-2018). See [REDACTED]; [P01949](#), p.2; THEUNENSReynaud:T.66(6-Mar-2018); MILOVANOVIĆManojlo:[P02934](#), T.4381-4382,4492; MILOVANOVIĆManojlo:[P02935](#), T.15373. See [P02888](#), p.268; [REDACTED].

<sup>1283</sup> [P02888](#), p.269.

<sup>1284</sup> [REDACTED]; [P02888](#), p.266-267; MILOVANOVIĆManojlo:[P02935](#), T.15386. See [1D00870](#), p.10.

<sup>1285</sup> [2D00083](#), p.5.

<sup>1286</sup> See e.g. [REDACTED]; [1D01439](#), p.5; [REDACTED]; THEUNENSReynaud:[P01980](#), p.503. Cross-reference Section [II.F.4\(b\)\(iv\)](#).



number of sabotage-terrorist groups be formed from the Divič training camp to infiltrate enemy camps and villages.<sup>1287</sup>

293. Captain DRAGAN<sub>(DB)</sub> trained recruits using captured Muslims for live target practice,<sup>1288</sup> and the men under his command persecuted non-Serbs in Zvornik municipality, subjecting them to mistreatment, killing, terrorising, raping and looting.<sup>1289</sup> By 5 July 1992, in response to reports of the horrific training methods employed by Captain DRAGAN<sub>(DB)</sub> and the unlawful actions of his men, the VRS had shut down the Divič training camp.<sup>1290</sup> The RS-MUP recommended that members of Captain DRAGAN<sub>(DB)</sub> formation should be enabled to return to regular units of the VRS, where they could continue making meaningful contributions to the CCP.<sup>1291</sup>

(ii) Skelani

294. The Accused also deployed the Unit to establish training camps south of Zvornik in preparation for operations to remove non-Serbs from the Drina valley to secure the First and Third Strategic Goals.<sup>1292</sup> During a meeting in Bajina Bašta, Serbia, in around June 1992, **SIMATOVIĆ** informed Serb municipal leaders from Skelani, Bratunac, Višegrad and Zvornik that it had been agreed at “the top military, political and state levels in Republika Srpska and Serbia” that “centres to train soldiers” would be established in the municipalities, with instructors and commanders from Serbian special police units “in a special structure he was commanding”.<sup>1293</sup>

295. In accordance with **SIMATOVIĆ**’s instructions,<sup>1294</sup> on 8 June 1992 Unit member PUPOVAC<sub>(DB)</sub> established a SerbianDB training camp at the elementary school in Skelani, under the command of **SIMATOVIĆ**.<sup>1295</sup> Unit members<sup>1296</sup> selected men from

<sup>1287</sup> [1D01439](#), p.5(emphasis added).

<sup>1288</sup> [REDACTED].

<sup>1289</sup> [REDACTED]; [P02888](#), p.250,252,264.

<sup>1290</sup> [P03589](#); [REDACTED]; MILOVANOVIĆManojlo:[P02934](#), T.4381-4382,4492; MILOVANOVIĆManojlo:[P02935](#), T.15373-15374,15380-15382; [REDACTED]; [2D00083](#), p.3,5; [REDACTED]; [P02888](#), p.250,252,264.

<sup>1291</sup> [2D00083](#), p.5.

<sup>1292</sup> Cross-reference Section [II.D.2\(a\)\(iv\)a](#); Section [II.F.4\(b\)\(iv\)](#); Section [II.F.5\(b\)\(i\)](#).

<sup>1293</sup> DERONJIĆMiroslav:[P01717](#), para.134-138.

<sup>1294</sup> DERONJIĆMiroslav:[P01717](#), para.134-138.

<sup>1295</sup> [2D00089](#), p.5; [P03600](#); [P03201](#), p.1; [P01946](#), p.1-2; [P03730](#), p.2; [P03621](#), p.2; [P01942](#), p.1-2; MILOVANOVIĆManojlo:[P02934](#), T.4623-4624; [1D00896](#), p.1; DERONJIĆMiroslav:[P01717](#), para.131-132,139; [P03615](#), p.2; [1D00070](#), p.2; [P01949](#), p.2; [P01974](#), p.2; [P02843](#), p.4-5; [REDACTED]; [1D00093](#), p.2-3; [2D00184](#), p.2-3. Cross-reference Section [II.D.2\(a\)\(iv\)a](#); Section [II.F.4\(b\)\(iv\)](#). Training camps in



Skelani, Bratunac, and Bajina Bašta to be trained by Unit instructors at the Skelani camp.<sup>1297</sup> The group based at Skelani, which initially consisted of 20 military conscripts, grew to some 150 soldiers and was known as the Skelani Red Berets.<sup>1298</sup> Members of the Skelani Red Berets also trained other groups, including recruits of the VRS's Skelani Independent Battalion.<sup>1299</sup>

296. Groups trained at Skelani participated in combat and mopping up operations alongside Unit members to ethnically cleanse the Drina valley.<sup>1300</sup> The Skelani camp remained in the control of the Red Berets until at least June 1993.<sup>1301</sup>

(iii) Bratunac

297. By February 1993, following **SIMATOVIĆ**'s instructions,<sup>1302</sup> **MIJOVIĆ**<sub>(DB)</sub> and several Unit members under his command<sup>1303</sup> established a training camp in Bratunac.<sup>1304</sup> Unit members recruited around 100 local Serbs from Bratunac who they trained at the camp and integrated into Red Berets units under Unit members' command.<sup>1305</sup> **MIJOVIĆ**<sub>(DB)</sub>'s Unit also trained VRS military police.<sup>1306</sup> **MIJOVIĆ**<sub>(DB)</sub> had jeeps and sophisticated weapons supplied to the Bratunac training camp from Serbia; recruits based there were financed by the SerbianDB.<sup>1307</sup> Under **MIJOVIĆ**'s<sub>(DB)</sub> command, the Bratunac

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Višegrad and Rogatica were established soon after the Skelani camp was established: *See* **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.139.

<sup>1296</sup> Unit members present at Skelani included: Radojica **BOŽOVIĆ**<sub>(DB)</sub>; Nikola **PILIPOVIĆ**<sub>(DB)</sub>; Nikola **PUPOVAC**<sub>(DB)</sub>; Predrag **SPASOJEVIĆ**<sub>(DB)</sub>, *cross-reference* AnnexA, *see e.g.* [P02824](#), p.9; [P02832](#), p.17-18; [P02836](#), p.1; [P02843](#), p.4-6; [P02844](#), p.6; [P02845](#), p.1; **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.132,139-140; [P03201](#), p.1; [P01942](#), p.3-6.

<sup>1297</sup> **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.139-140; [P03201](#), p.1; [P01942](#), p.3-6; **MILOVANOVIĆ**<sub>Manojlo</sub>:[P02934](#), T.4623-4624; [1D00070](#), p.2; [P03201](#), p.2.

<sup>1298</sup> [P01942](#), p.1,3-6; **MILOVANOVIĆ**<sub>Manojlo</sub>:[P02934](#), T.4623-4624; [P01946](#), p.1-2; [2D00089](#), p.5; **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.131-132,139; [P03615](#), p.2; [P03730](#), p.2; [P03621](#), p.2; [1D00070](#), p.2; [P01949](#), p.2. *Cross-reference* Section [II.D.2\(a\)\(iv\)a](#).

<sup>1299</sup> [P03615](#), p.2; [P03600](#).

<sup>1300</sup> *See e.g.* [P01942](#), p.1-2; **MILOVANOVIĆ**<sub>Manojlo</sub>:[P02934](#), T.4623-4624; [P03621](#), p.2; [P02842](#), p.3-4; [P02058](#), p.1; [P02059](#), p.1; [1D00093](#), p.2-3. *Cross-reference* Section [II.F.4\(b\)\(iv\)](#); Section [II.F.5\(b\)\(i\)](#).

<sup>1301</sup> [P01942](#), p.1; [P01946](#), p.1-2.

<sup>1302</sup> **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.134-138,145-146.

<sup>1303</sup> Unit members present at Bratunac included: Njegoslav **KUŠIĆ**<sub>(DB)</sub>; Ranko **LAČEVIĆ**<sub>(DB)</sub>; Vasilije **MIJOVIĆ**<sub>(DB)</sub>; Budimir **ZEČEVIĆ**<sub>(DB)</sub>, *cross-reference* AnnexA, *see e.g.* [P02569](#), p.14; [P02834](#), p.43.

<sup>1304</sup> **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.145-148; [1D00070](#), p.2; [P01949](#), p.1; [P03543](#), p.4; **THEUNENS**<sub>Reynaud</sub>:[P01980](#), p.520; [REDACTED]; [P03242](#); [P02852](#), p.1; [P02834](#), p.25,42-43,47; [P01941](#), p.3; [P01940](#); [P03667](#), p.1-2; [1D00103](#), p.1; [1D00070](#); [P03243](#). *Cross-reference* Section [II.D.2\(a\)\(iv\)a](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>1305</sup> [1D00070](#), p.2; **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.146-147.

<sup>1306</sup> [1D00103](#), p.1; **THEUNENS**<sub>Reynaud</sub>:T.20(16-Mar-2018). *See* [P03676](#).

<sup>1307</sup> **DERONJIĆ**<sub>Miroslav</sub>:[P01717](#), para.146,149.

Red Berets deployed in scorched-earth operations in pursuit of the First and Third Strategic Goals, furthering the CCP in the Podrinje in 1993.<sup>1308</sup>

(iv) Tara

298. From at least January 1993, the Unit also trained fighters on Mt. Tara in Serbia to be deployed in eastern BiH.<sup>1309</sup> **SIMATOVIĆ** was often at Tara<sup>1310</sup> and provided Unit members,<sup>1311</sup> known as “Frenki’s men”, as instructors, under the command of **BOŽOVIĆ<sub>(DB)</sub>** and Zvezdan JOVANOVIĆ<sub>(DB)</sub>.<sup>1312</sup> According to Serbian JB-PJM commander Obrad STEVANOVIĆ,<sup>1313</sup> [REDACTED],<sup>1314</sup> [REDACTED].<sup>1315</sup>

299. “Frenki’s men” provided intensive combat training<sup>1316</sup> to the Skelani Red Berets from January 1993,<sup>1317</sup> up to 200 PJM members sent to Tara by STEVANOVIĆ from February to March 1993,<sup>1318</sup> and some 20 locally recruited Unit members after February 1993.<sup>1319</sup> From Mt. Tara, trainees deployed alongside their instructors in scorched-earth operations in the Podrinje that pushed non-Serbs into enclaves and burned their villages so they could not return, advancing the First and Third Strategic Goals in accordance with Directive 4.<sup>1320</sup> The success of these operations was credited, at least in part, to the

<sup>1308</sup> See e.g. DERONJIĆ Miroslav: [P01717](#), para.148; [1D00103](#), p.1; [REDACTED]; [P01941](#), p.3; [P02834](#), p.43,47; [P01940](#); THEUNENS Reynaud: T.34(6-Mar-2018); [P03684](#), p.2; [1D00070](#), p.2; [P03671](#), p.1. *Cross-reference* Section [II.F.4\(b\)\(iv\)](#); Section [II.F.5\(b\)\(i\)](#).

<sup>1309</sup> [P01942](#), p.1; [P02374](#), p.3; [REDACTED]; STEVANOVIĆ Obrad: T.59-61(22-Sep-2020); [P02267](#); ANASTASIJEVIĆ Dejan: [P02423](#), para.82; [REDACTED]. See [P00500](#), p.16; [P02569](#), p.14; [P02852](#), p.2; [REDACTED]. See [REDACTED]; DERONJIĆ Miroslav: [P01717](#), para.150; [REDACTED]; STOPARIĆ Goran: [P00796](#), para.109; STOPARIĆ Goran: T.14(8-Nov-2017); [REDACTED]; [P02554](#); PLAHUTA Dejan: T.44(20-Nov-2019); LUČIĆ Miroslav: T.42(8-Sep-2020); [REDACTED]; [2D00052](#); [2D00053](#).

<sup>1310</sup> See e.g. DERONJIĆ Miroslav: [P01717](#), para.150. *Cross-reference* Section [II.D.2\(a\)\(iv\)a](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>1311</sup> Unit members present at Tara included: Radojica BOŽOVIĆ<sub>(DB)</sub>; Zvezdan JOVANOVIĆ<sub>(DB)</sub>; Slobodan MAJSTOROVIĆ<sub>(DB)</sub>; Vasilije MIJOVIĆ<sub>(DB)</sub>; Nikola PILIPOVIĆ<sub>(DB)</sub>; Ranko LAČEVIĆ<sub>(DB)</sub>; Milan RADONJIĆ<sub>(DB)</sub>; [REDACTED], *cross-reference* Annex A, see e.g. [P00859](#), p.6,20; [P02866](#), p.1; [P00266](#), p.30; [P02569](#), p.14.

<sup>1312</sup> [REDACTED]; [P03853](#); STEVANOVIĆ Obrad: T.55(22-Sep-2020); STEVANOVIĆ Obrad: T.45(30-Sep-2020); [REDACTED]; GREKULOVIĆ Srdan: T.28,31(8-Oct-2019); GREKULOVIĆ Srdan: T.37-38(9-Oct-2019); [P02834](#), p.44; [P02852](#), p.2; NOVAKOVIĆ Radenko: T.45-46(17-Sep-2019); NOVAKOVIĆ Radenko: T.36-37(18-Sep-2019); [REDACTED].

<sup>1313</sup> [REDACTED]. The terms “PJP” and “PJM” refer to the same Serbian MUP public security units: See RFJ-083: T.6(8-May-2018); [REDACTED]; ANASTASIJEVIĆ Dejan: [P02423](#), para.78-79.

<sup>1314</sup> [REDACTED].

<sup>1315</sup> [REDACTED].

<sup>1316</sup> [REDACTED].

<sup>1317</sup> [P01942](#), p.1.

<sup>1318</sup> [REDACTED]; STEVANOVIĆ Obrad: T.64-65(22-Sep-2020); [REDACTED]; [1D00115](#).

<sup>1319</sup> [P02569](#), p.10,14.

<sup>1320</sup> See e.g. [REDACTED]; RFJ-083: T.19-21,23-25,37-38(08-May-2018); RFJ-083: T.25(9-May-2018); RFJ-083: T.59-60(10-May-2018); STEVANOVIĆ Obrad: T.10(23-Sep-2020);

instruction provided at Mt. Tara, with one trainee remarking, “thanks to the unit that helped us with the training, we carried out the remaining tasks well”.<sup>1321</sup>

300. Members of the Accused’s units—including the Unit, SDG, and Scorpions—received training at Tara at key moments until the end of the Indictment period.<sup>1322</sup> [REDACTED].<sup>1323</sup>

(c) The Accused established training camps in the RSK and SAO-SBWS to train Serb Forces which they used to advance the CCP in the RSK and SAO-SBWS

(i) Petrova Gora

301. In November 1994, Unit members to be deployed by the Accused for Operation Pauk, including units commanded by BOŽOVIĆ<sub>(DB)</sub>, IVANOVIĆ<sub>(DB)</sub>, and LEGIJA<sub>(DB)</sub>, mustered at Petrova Gora, in RSK near BiH’s north-western border.<sup>1324</sup> These Unit members,<sup>1325</sup> who had been trained at the Accused’s training camps,<sup>1326</sup> were instructed to train and equip Muslim separatist leader Fikret ABDIĆ’s army, numbering some 5,000 to 6,000 soldiers, in preparation for combat against the ABiH 5<sup>th</sup> Corps,<sup>1327</sup> which would secure the First and Fourth Strategic Goals, thereby furthering the CCP by keeping ABDIĆ’s friendly forces as a buffer to maintain cleansed territory in RSK.<sup>1328</sup> Unit members [REDACTED]<sup>1329</sup> and trained them at various nearby locations.<sup>1330</sup>

302. [REDACTED],<sup>1331</sup> ABDIĆ’s army received further military training from SerbianDB units commanded by [REDACTED] and LEGIJA<sub>(DB)</sub> [REDACTED].<sup>1332</sup>

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STEVANOVIĆObad:T.48(24-Sep-2020); [REDACTED]; [P02569](#), p.14; [P00500](#), p.16; [P01943](#), p.137. Cross-reference Section [II.D.2\(a\)\(iv\)](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>1321</sup> [P02569](#), p.14.

<sup>1322</sup> See e.g. [REDACTED]; [REDACTED]; [REDACTED]; [P01942](#), p.1; [P00266](#), p.30; [P01941](#), p.3,5; [REDACTED]; [P02864](#), p.24,38,47,49,63-64; [P02852](#), p.2; [P01941](#), p.3,5; [REDACTED]; STOPARIĆGoran:[P00796](#), para.75; [REDACTED]; STOPARIĆGoran:T.63-64(7-Nov-2017); [REDACTED].

<sup>1323</sup> [REDACTED]; PLAHUTADejan:T.56-57(19-Nov-2019); [REDACTED]. Cross-reference Section [II.F.5\(b\)\(ii\)](#).

<sup>1324</sup> Cross-reference Section [II.D.2\(a\)\(iv\)](#); Section [II.F.5\(b\)\(ii\)](#). See e.g. [REDACTED]; SLIŠKOVIĆDejan:[P02538](#), para.6-7; [REDACTED].

<sup>1325</sup> Unit members present at Petrova Gora included: Radojica BOŽOVIĆ<sub>(DB)</sub>; Živojin IVANOVIĆ<sub>(DB)</sub>; [REDACTED]; Milorad ULEMEK<sub>(DB)</sub>, cross-reference AnnexA, see e.g. [REDACTED].

<sup>1326</sup> See e.g. [REDACTED]; SLIŠKOVIĆDejan:[P02538](#), para.3; [REDACTED]; [REDACTED].

<sup>1327</sup> [REDACTED]; STOPARIĆGoran:[P00796](#), para.88. See [REDACTED].

<sup>1328</sup> Cross-reference Section [II.F.5\(b\)\(ii\)](#).

<sup>1329</sup> [REDACTED].

<sup>1330</sup> [P03784](#); [REDACTED]; SLIŠKOVIĆDejan:[P02538](#), para.7; [REDACTED]; [P02893](#), p.21.

<sup>1331</sup> Cross-reference Section [II.F.5\(b\)\(ii\)](#).

**SIMATOVIĆ** acknowledged the training activities which occurred at and around Petrova Gora in his **KOSTIĆ** Centre speech, noting that the Unit was the “backbone” of **ABDIĆ**’s army.<sup>1333</sup>

(ii) Training continued throughout 1995

303. The Accused and SerbianDB continued expanding their training activities throughout the Indictment period, establishing further training camps in SBWS<sup>1334</sup> and RSK<sup>1335</sup> to train Serb Forces to maintain the territory from which JCE members had removed non-Serbs in the preceding years, pursuing the CCP by taking measures to ensure that the removal of non-Serbs would be permanent.<sup>1336</sup>

**F. STANIŠIĆ and SIMATOVIĆ and other JCE members implemented the CCP in Croatia and BiH from 1991 to 1995**

***1. The Accused and their co-JCE members implemented the CCP in Krajina***

304. Beginning in 1990, Serb leaders in the Krajina began the process of establishing an autonomous Serb territory, endorsing MILOŠEVIĆ’s vision to create a Serb-dominated state,<sup>1337</sup> declaring autonomy from Croatia and proclaiming the Krajina as an autonomous Serb district, the SAO-Krajina.<sup>1338</sup> By January 1992, these Serb leaders—now jointly pursuing the CCP—executed a campaign of massive expulsion, murder, and persecution of non-Serbs in SAO-Krajina, making clear that their political aspiration of “autonomy” was inextricably bound to their criminal aspiration of violently removing non-Serbs.

305. In 1990, the Accused and Krajina Serb leadership began preparing the structures and forces necessary to implement what would crystallise as the CCP by no later than April 1991. MILOŠEVIĆ and **STANIŠIĆ** routinely met with Serb leaders in Krajina, selecting MARTIĆ and BABIĆ as faithful allies to execute the CCP. They established

<sup>1332</sup> [P03784](#); [REDACTED]; [P02893](#), p.21; [REDACTED].

<sup>1333</sup> [P00256](#), p.11. See [P00537](#)(00:00:38-00:00:44), p.1; [REDACTED]. Cross-reference AnnexB.

<sup>1334</sup> See e.g. [REDACTED]; RFJ-151:T.56(19-Sep-2017); [P00553](#), p.13-14; [REDACTED]. See [P00545](#), p.2,4-5; [P00553](#), p.18 (SIMATOVIĆ is referred to as “F” in the MUP Belgrade. The name of his secretary was Slada).

<sup>1335</sup> See e.g. [P02865](#), p.1-3,8; [P02870](#), p.1,3,4,18-20,23; [P02713](#), p.1,3,5-7; [P02856](#), p.2; [P02861](#), p.4,8; NIELSENChristian:[P00850](#), p.75.

<sup>1336</sup> Cross-reference Section [II.F.5\(b\)\(v\)](#).

<sup>1337</sup> See AF77.

<sup>1338</sup> See AF148-AF149.

Serb governance structures and police, state security, and TO forces, setting the stage for the persecutory campaign against non-Serbs that would kick off in earnest that summer, after months of skirmishes and discriminatory measures targeting non-Serbs.

306. The Accused played a leading, albeit covert, role from the beginning. **STANIŠIĆ** provided men to staff barricades in 1990 and both Accused set up a camp at Golubić around April 1991 that trained Serb fighters who carried out the CCP. At Golubić, the Accused established their own SerbianDB Unit—a paramilitary unit under their direct and exclusive authority, which they would deploy repeatedly into operations furthering the CCP across Croatia and BiH until the end of 1995. The Accused helped set up MARTIĆ’s SAO-Krajina police—a “police” force that participated in the expulsion campaign rather than working to stop it and punish the criminals who carried it out. Embedded in these security forces were SerbianDB members reporting to Belgrade. **SIMATOVIĆ** oversaw the supply of weapons and training of MARTIĆ’s Krajina forces (police and TO) and the Unit.

307. From June to December 1991, the Serb Forces, established and equipped by the Accused and other JCE members, launched successive attacks against non-Serb civilians, terrorising the non-Serb population through murders, persecution and other grave crimes, which provoked an exodus of non-Serbs that was to last until 1995.

(a) The Accused and MILOŠEVIĆ supported Krajina Serbs in establishing separate government structures in the lead-up to the conflict

(i) During 1990, the Accused and MILOŠEVIĆ empowered BABIĆ and MARTIĆ, laying the groundwork for the CCP

308. The multi-party elections held in Croatia in April/May 1990 polarised the populace along ethnic lines, as the nationalist-oriented political parties HDZ and SDS took power.<sup>1339</sup> In July, the Krajina Serbs established a Serb Assembly, declared the sovereignty and autonomy of Croatian Serbs, and formed the SNC as the Assembly’s executive body.<sup>1340</sup> Under MILOŠEVIĆ’s direction from at least August 1990, the Krajina Serbs began forming separate Serb government structures. From among the local

<sup>1339</sup> DONIARobert: [P01600](#), p.11; DONIARobert:T.12(30-Jan-2018). See AF145-AF146.

<sup>1340</sup> See AF147.

Serbs vying for power, MILOŠEVIĆ and STANIŠIĆ supported MARTIĆ and BABIĆ, whose extremist views made them suitable partners for furthering shared goals.

a. BABIĆ and MARTIĆ actively participated in radicalising the SDS and Serb police

309. Amid brewing ethnic tensions, the Croatian branch of the SDS was founded in February 1990 on a platform that advocated redrawing Croatia's regional and municipal boundaries along ethnic lines, asserting the right of territories with a "special ethnic composition" to become autonomous through referendum.<sup>1341</sup> By summer, the SDS had MILOŠEVIĆ's support.<sup>1342</sup>

310. BABIĆ rose to political prominence as a radical Serb nationalist,<sup>1343</sup> assuming prominent roles on the SDS Regional Board for Krajina and as President of the SDS Municipal Board in Knin.<sup>1344</sup> On 25 July 1990, BABIĆ participated in the inaugural Serbian Assembly in Srb, which was established to represent Croatian Serbs and immediately issued a declaration on Serb sovereignty and autonomy in Croatia.<sup>1345</sup> On 31 July 1990, BABIĆ became president of the SNC, the executive body of the Serbian Assembly.<sup>1346</sup> At its first meeting, held that day,<sup>1347</sup> the SNC voted to hold a referendum on a declaration of Serb autonomy in Croatia.<sup>1348</sup> BABIĆ was considered a hardliner in the SDS party, not opposed to war, favouring unification with Serbia at any cost, and looking to Belgrade for leadership.<sup>1349</sup>

311. MARTIĆ, a Knin policeman known for his violence and abuse of his police authority,<sup>1350</sup> began arming and preparing the Serb police and "awakening the patriotic

<sup>1341</sup> BABIĆMilan:P01243, p.12; P01561, p.12,17; BABIĆMilan:P01246, T.12880; [REDACTED]; BABIĆMilan:P01560, para.2,5-6; SAVIĆBorivoje:P00449, para.6; [REDACTED].

<sup>1342</sup> BABIĆMilan:P01246, T.12883.

<sup>1343</sup> BABIĆMilan:P01243, p.12-13; BABIĆMilan:P01560, para.10; [REDACTED]; BOSNIĆMile:T.67-68(22-Aug-2019). See also P01571; P01269.

<sup>1344</sup> BABIĆMilan:P01248, T.1326; BABIĆMilan:P01246, T.12864,13480,13665-3666; BABIĆMilan:P01243, p.10-11.

<sup>1345</sup> BABIĆMilan:P01243, p.13; BABIĆMilan:P01246, T.12908; [REDACTED]; BABIĆMilan:P01560, para.10; P01269; 1D00024, p.4. See AF147.

<sup>1346</sup> [REDACTED]; BABIĆMilan:P01560, para.12. See AF147.

<sup>1347</sup> BABIĆMilan:P01243, p.13.

<sup>1348</sup> [REDACTED]; BABIĆMilan:P01246, T.12908; BABIĆMilan:P01560, para.12.

<sup>1349</sup> SAVIĆBorivoje:T.29(12-Sep-2017); SAVIĆBorivoje:P00449, para.96; BABIĆMilan:P01246, T.13004-13005,12915,13419,13556-13557,13631,13668-13669; BABIĆMilan:P01248, T.1473; [REDACTED]; [REDACTED]; [REDACTED]. See AF158.

<sup>1350</sup> [REDACTED]; [REDACTED].



consciousness with the Serbs” from January 1990.<sup>1351</sup> MARTIĆ organised a petition for Serbs on the Knin police who refused to wear the Croatian checkerboard insignia, which they sent to the FSUP Minister and MILOŠEVIĆ loyalist Petar GRAČANIN<sup>1352</sup> on 5 July 1990.<sup>1353</sup> This petition marked the Serb police’s public convergence with the SDS “movement”, reflecting what MARTIĆ proudly touted as the Krajina Serbs’ “fanaticism”.<sup>1354</sup> So significant was this public declaration of protest, in defiance of the Croatian MUP and republic, that the Accused and other JCE members would commemorate 5 July in the years to come as RSK Security Day.<sup>1355</sup> MARTIĆ characterised the ensuing period of intense coordination and constant communication between him and BABIĆ and between the Serb police and the SDS in Krajina, as work done “practically in parallel, but absolutely along the same lines”.<sup>1356</sup>

b. The Accused and MILOŠEVIĆ began positioning BABIĆ and MARTIĆ to advance the CCP by August 1990, activating the “parallel structure”

312. Having distinguished themselves through their Serb nationalist activism in Krajina and garnered significant local appeal,<sup>1357</sup> by August 1990, BABIĆ and MARTIĆ captured the attention—and support—of MILOŠEVIĆ and STANIŠIĆ. MILOŠEVIĆ and the Accused could not openly take part in events in Krajina, and worked covertly with and through Krajina Serbs in laying the groundwork for the CCP.<sup>1358</sup> Displeased with SDS founder Jovan RAŠKOVIĆ’s opposition to war, MILOŠEVIĆ empowered BABIĆ,<sup>1359</sup> a “Serb-ethno egoist”<sup>1360</sup> who “did not advocate peaceful solutions [...], but

<sup>1351</sup> [1D00024](#), p.1.

<sup>1352</sup> [REDACTED]; [REDACTED].

<sup>1353</sup> [REDACTED]; [P00009](#)(00:00:48-00:02:56), p.1; RJS-07:T.14(28-Aug-2019); [REDACTED]; BABIĆMilan:[P01248](#), T.1360-1363,1753-1754; BABIĆMilan:[P01246](#), T.13861-13862; [P01381](#), p.14; [REDACTED]; [P00214](#).

<sup>1354</sup> [P00009](#)(00:02:57-00:04:02), p.2; [REDACTED]; BABIĆMilan:[P01246](#), T.13862; RJS-07:T.14(28-Aug-2019).

<sup>1355</sup> [P03726](#); [P00335](#); [P00010](#); [P00589](#); DRAČAAco:T.12(3-Dec-2019); [REDACTED]; [REDACTED]; [P00214](#)(plaque commemorating the July 1990 petition displayed at Golubić); [REDACTED]; [REDACTED].

<sup>1356</sup> [P00009](#)(00:02:57-00:04:02), p.2; BABIĆMilan:[P01248](#), T.1360-1365; [REDACTED].

<sup>1357</sup> BABIĆMilan:[P01248](#), T.1360-1363; BABIĆMilan:[P01243](#), p.12-13; [REDACTED].

<sup>1358</sup> See e.g. BABIĆMilan:[P01243](#), p.17; [REDACTED]; BABIĆMilan:[P01246](#), T.13803-13805,13814; BABIĆMilan:[P01248](#), T.1414-1415; [P02439](#), p.1-2; ANASTASIJEVIĆDejan:T.76(21-Jun-2018); ANASTASIJEVIĆDejan:[P02423](#), para.20-21,24-26.

<sup>1359</sup> [REDACTED]; [REDACTED]; [REDACTED]; SAVIĆBorivoje:[P00449](#), para.11,134-135; SAVIĆBorivoje:T.36(12-Sep-2017); BABIĆMilan:[P01246](#), T.13107.

<sup>1360</sup> BABIĆMilan:[P01243](#), p.20; BABIĆMilan:[P01246](#), T.13419,13556-13557,13631,13668-13669; [REDACTED]. Cross-reference Section [II.C.9](#). See also SAVIĆBorivoje:[P00449](#), para.96.



was very radical”.<sup>1361</sup> At this stage, BABIĆ’s infatuation with MILOŠEVIĆ’s promises and policies made him amenable to taking instruction from MILOŠEVIĆ and STANIŠIĆ.<sup>1362</sup> MARTIĆ, although outspoken and brazen in his commitment to the Serb cause, “had [...] nothing in his head”,<sup>1363</sup> making him someone STANIŠIĆ and MILOŠEVIĆ could exploit to carry out their will.<sup>1364</sup>

313. STANIŠIĆ personally traveled to Knin in August 1990 to meet with MARTIĆ,<sup>1365</sup> who arranged a meeting with BABIĆ, at which MARTIĆ introduced STANIŠIĆ as a member of the SMUP.<sup>1366</sup> During this first meeting with STANIŠIĆ, BABIĆ became aware of what he called the “parallel structure” in SAO-Krajina, through which MILOŠEVIĆ, STANIŠIĆ, and SIMATOVIĆ influenced MARTIĆ and controlled events in the Krajina.<sup>1367</sup> [REDACTED],<sup>1368</sup> [REDACTED],<sup>1369</sup> [REDACTED].<sup>1370</sup>

314. With MARTIĆ’s encouragement,<sup>1371</sup> BABIĆ first contacted MILOŠEVIĆ in August 1990 to discuss the Krajina Serbs’ situation.<sup>1372</sup> MILOŠEVIĆ was receptive, instructing BABIĆ to request an official meeting with the President of the SFRY Presidency, Borisav JOVIĆ,<sup>1373</sup> “the second man in the party led by Mr. Milošević”.<sup>1374</sup> When BABIĆ and other Knin leaders met with JOVIĆ on 13 August 1990,<sup>1375</sup> JOVIĆ conveyed MILOŠEVIĆ’s promise that the Krajina Serbs would have his political support and the JNA’s protection.<sup>1376</sup> On 16 August 1990, the SNC called for a referendum on the autonomy of Serbs in Croatia,<sup>1377</sup> as MARTIĆ secretly staged a break-in at the Knin

<sup>1361</sup> [REDACTED]; [REDACTED]; [REDACTED]; [2D00241](#). See also [REDACTED].

<sup>1362</sup> BABIĆMilan:[P01246](#), T.13092-13094,14044-14045; SAVIĆBorivoje:[P00449](#), para.96; [REDACTED]; [REDACTED].

<sup>1363</sup> [REDACTED]; RFJ-153:T.42(14-Jun-2017); [REDACTED].

<sup>1364</sup> BABIĆMilan:[P01246](#), T.13123-13124; [REDACTED]; BABIĆMilan:[P01248](#), T.1525; [REDACTED].

<sup>1365</sup> BABIĆMilan:[P01246](#), T.12933; [REDACTED]. See also [REDACTED]; [REDACTED].

<sup>1366</sup> BABIĆMilan:[P01248](#), T.1521-1522; BABIĆMilan:[P01246](#), T.12930,12932-12933,13502-13503,14001.

<sup>1367</sup> [REDACTED]. Cross-reference Section [II.E.1\(b\)](#).

<sup>1368</sup> [REDACTED].

<sup>1369</sup> [REDACTED]. See also [REDACTED].

<sup>1370</sup> [REDACTED].

<sup>1371</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.12912-12913. See also [1D00024](#), p.5-6.

<sup>1372</sup> BABIĆMilan:[P01246](#), T.12912-12915; [REDACTED]; BABIĆMilan:[P01243](#), p.14.

<sup>1373</sup> BABIĆMilan:[P01246](#), T.12914.

<sup>1374</sup> BABIĆMilan:[P01246](#), T.12921.

<sup>1375</sup> BABIĆMilan:[P01246](#), T.12916; BABIĆMilan:[P01243](#), p.14; [1D00024](#), p.5-6.

<sup>1376</sup> BABIĆMilan:[P01246](#), T.13608,13932. See also BABIĆMilan:[P01243](#), p.14; BABIĆMilan:[P01246](#), T.12921-12922.

<sup>1377</sup> [P01323](#), p.2; BABIĆMilan:[P01246](#), T.12922,13608; BABIĆMilan:[P01560](#), para.12; BABIĆMilan:[P01243](#), p.13. See AF148. See also BABIĆMilan:[P01246](#), T. 13669; [REDACTED].

police station and removed the weapons stores to a youth centre at Golubić.<sup>1378</sup> The Government of Croatia declared the referendum illegal the next day.<sup>1379</sup> The following day, MARTIĆ led the Krajina Serbs in erecting armed barricades in the Krajina, launching what would become known as the Log Revolution, discussed below.<sup>1380</sup>

315. MILOŠEVIĆ met with BABIĆ several times in 1990, guiding his political movements and influencing his decisions.<sup>1381</sup> Meeting in person for the first time in October,<sup>1382</sup> BABIĆ sought and received MILOŠEVIĆ's approval for the SDS's participation in the elections in Serbia.<sup>1383</sup> Subsequent meetings between MILOŠEVIĆ and BABIĆ usually related to the situation on the ground in the Krajina and JNA support for Serbs in Croatia.<sup>1384</sup> [REDACTED].<sup>1385</sup>

c. With support from STANIŠIĆ, MARTIĆ led the Log Revolution and the Council of Serb National Resistance

316. MARTIĆ launched the Log Revolution on 17 August 1990, establishing barricades manned by armed Serbs around Krajina<sup>1386</sup> "to intimidate Croats"<sup>1387</sup> and raise ethnic tensions.<sup>1388</sup> [REDACTED].<sup>1389</sup> [REDACTED].<sup>1390</sup>

317. From Golubić, MARTIĆ distributed the weapons taken from the Knin police station to Serb reserve police.<sup>1391</sup> This first organised distribution of weapons in Krajina

<sup>1378</sup> [1D00024](#), p.6-7; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See [REDACTED]; RFJ-066:T.18-19,21(12-Jul-2017).

<sup>1379</sup> [REDACTED]; BABIĆMilan:[P01243](#), p.14. See AF148.

<sup>1380</sup> Cross-reference Section [II.F.1\(a\)\(i\)c](#).

<sup>1381</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13985; [REDACTED]; [REDACTED]. See also BABIĆMilan:[P01246](#), T.13041,13055-13056,13092,13103-13104,13107,13111,13164,13177,13179,13184,13193-13195,13197,13200,13236-13237,13249-13250,13650-13651,13767,13811,14042,14044; BABIĆMilan:[P01248](#), T.1428-1429,1526,1793-1794; [REDACTED]; BABIĆMilan:[P01243](#), p.16-17; [REDACTED].

<sup>1382</sup> BABIĆMilan:[P01246](#), T.13093.

<sup>1383</sup> BABIĆMilan:[P01246](#), T.13093.

<sup>1384</sup> BABIĆMilan:[P01246](#), T.13093-13094.

<sup>1385</sup> [REDACTED].

<sup>1386</sup> [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.12923-12924; NIELSENChristian:[P00850](#), para.E26,259; [REDACTED]; RJS-07:T.19(27-Aug-2019). See AF148.

<sup>1387</sup> [REDACTED].

<sup>1388</sup> Cross-reference Section [II.F.1\(a\)\(i\)d](#).

<sup>1389</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.12930,12932-12933; [REDACTED]. See also [REDACTED].

<sup>1390</sup> [REDACTED]; NIELSENChristian:[P00850](#), para.E26,259; [REDACTED]. Cross-reference Section [II.E.3\(a\)\(i\)](#).

<sup>1391</sup> [REDACTED]; [REDACTED]; RFJ-066:T.18-19(12-Jul-2017); [1D00024](#), p.6-7; [REDACTED].

was planned in advance, in coordination with the SDS.<sup>1392</sup> [REDACTED].<sup>1393</sup> The weapons distribution was repeated at several other police stations.<sup>1394</sup>

318. Reserve and active duty Serb police from Krajina were ultimately joined by people arriving from Serbia to man the barricades.<sup>1395</sup> Among the people working the barricades were men who would later become Unit members and/or instructors at Golubić,<sup>1396</sup> including Zoran RAIĆ<sub>(DB)</sub>.<sup>1397</sup> Serbs used the barricades to exclude Croats from Serb-claimed areas, isolating Croat settlements and cutting their population off from main towns and roads.<sup>1398</sup> The barricades remained in some form until April 1991 when the SAO-Krajina police established permanent control.<sup>1399</sup>

319. With the Log Revolution underway, MARTIĆ formed the Council of Serb National Resistance at Golubić, through which he controlled operations at the barricades in the months that followed.<sup>1400</sup> The Council was a military coordination body through which MILOŠEVIĆ and the Accused<sup>1401</sup> could influence decision-making, comprising SDS members such as Nebojša MANDINIĆ<sub>(DB)</sub>,<sup>1402</sup> as well as SerbianDB assets Zoran RAIĆ<sub>(DB)</sub>, and Dušan ORLOVIĆ<sub>(DB)</sub>.<sup>1403</sup> [REDACTED].<sup>1404</sup> [REDACTED].<sup>1405</sup> [REDACTED].<sup>1406</sup>

320. Shortly after founding the SDG, in November 1990, ARKAN met in Knin with ORLOVIĆ<sub>(DB)</sub>, BABIĆ, MARTIĆ, MANDINIĆ<sub>(DB)</sub>, and others among the Krajina Serb

<sup>1392</sup> BABIĆMilan:[P01246](#), T.12912; BABIĆMilan:[P01248](#), T.1377-1378; [REDACTED]; RFJ-066:T.12-13(13-Jul-2017); [REDACTED].

<sup>1393</sup> [REDACTED]. [REDACTED]. [REDACTED].

<sup>1394</sup> BABIĆMilan:[P01246](#), T.12912.

<sup>1395</sup> [REDACTED]. *See also* BABIĆMilan:[P01246](#), T.12917.

<sup>1396</sup> Goran OPAČIĆ<sub>(DB)</sub>: [P01972](#), p.5. Dragan OLUIĆ<sub>(DB)</sub>: [P00261](#), p.5. Slobodan MAJSTOROVIĆ<sub>(DB)</sub>: [P02864](#), p.7. Predrag BAKLAJIĆ<sub>(DB)</sub>: [P00839](#), p.11. Nikola PILIPOVIĆ<sub>(DB)</sub>: [P00258](#), p.12. Nenad ŠARE<sub>(DB)</sub>: [P02870](#), p.1. *See also* [REDACTED]; [REDACTED]. *Cross-reference* AnnexA.

<sup>1397</sup> [P00233](#), p.9; [REDACTED].

<sup>1398</sup> [REDACTED]; BIĆANIĆAna:[P00388](#), T.25521-25522; BIĆANIĆAna:[P00387](#), p.3; [REDACTED]; BABIĆMilan:[P01246](#), T.12923-12924. *See also* NIELSENChristian:[P00850](#), para.259-260.

<sup>1399</sup> BABIĆMilan:[P01246](#), T.12931-12932; [REDACTED]; RFJ-153:T.43-44(14-Jun-2017). *Cross-reference* Section [II.F.1\(b\)\(i\)a](#).

<sup>1400</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00233](#), p.8-10.

<sup>1401</sup> [REDACTED]; BABIĆMilan:[P01243](#), p.16; [P02443](#), p.5-6.

<sup>1402</sup> BABIĆMilan:[P01246](#), T.12929,13491-13492; [REDACTED]; [REDACTED]; [REDACTED]. *See also* [P00382](#), p.1; [REDACTED].

<sup>1403</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00233](#), p.8-10.

<sup>1404</sup> [REDACTED].

<sup>1405</sup> [REDACTED].

<sup>1406</sup> [REDACTED].

leadership.<sup>1407</sup> They discussed ARKAN supplying his armed men and weapons to assist the Krajina Serbs with manning the barricades and taking over the Dvor na Uni police station to annex it to the SUP in Knin, which was already under MARTIĆ's control.<sup>1408</sup> In November, ARKAN was arrested transporting weapons to Dvor na Uni, putting these plans on hold.<sup>1409</sup>

321. The Croatian-MUP had suspended MARTIĆ from the Knin police after he organised the Log Revolution, which was widely reported in the media, making MARTIĆ a local hero.<sup>1410</sup> MARTIĆ retook *de facto* control over the Knin police by November/December 1990.<sup>1411</sup>

d. MILOŠEVIĆ and the Accused stoked ethnic tensions to provoke the conflict

322. As set out above, the Accused—and MILOŠEVIĆ—used what BABIĆ called a “parallel structure”, which was an association of individuals operating outside the formal Krajina government structures, to influence events and further the CCP in Krajina.<sup>1412</sup> Through this “parallel structure” the Accused and MILOŠEVIĆ sought to escalate inter-ethnic conflict in Krajina by manufacturing incidents to provoke fear among Serbs and intervention by the Croatian police, with the goal of drawing the JNA into the conflict and prompting a state of emergency.<sup>1413</sup> Those linked to the parallel structure vehemently opposed attempts to negotiate a peaceful solution between the Croatian government and the SDS in September 1990, and proponents of a peace agreement were physically threatened.<sup>1414</sup> From October 1990, MARTIĆ and the Council of National Resistance stoked ethnic tensions by issuing provocative statements, blocking rail traffic, blowing up Croat-owned shops, houses and vehicles, and disrupting the power supply.<sup>1415</sup> In

<sup>1407</sup> [P03746](#), p.4-5; [P03857](#), p.1-3; [P00382](#), p.2; [REDACTED]; [2D00152](#)(01:19:40-01:22:22), p.10; [REDACTED].

<sup>1408</sup> [P03746](#), p.4-5; [P03857](#), p.1-3; [P00382](#), p.2; [REDACTED].

<sup>1409</sup> Cross-reference Section [II.D.2\(b\)\(i\)](#). See [REDACTED]; [P03180](#); [REDACTED]; [P03754](#).

<sup>1410</sup> [P03743](#); [P03744](#); [REDACTED]; [REDACTED].

<sup>1411</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; RFJ-153:T.42(14-Jun-2017).

<sup>1412</sup> Cross-reference Section [II.E.1\(b\)](#).

<sup>1413</sup> [REDACTED]; BABIĆMilan:[P01243](#), p.15-16; BABIĆMilan:[P01246](#), T.12936-12938,13501; [P00020](#), p.2. See also [P02439](#), p.1-2.

<sup>1414</sup> BABIĆMilan:[P01246](#), T.12934,12936; BABIĆMilan:[P01248](#), T.1387-1388; [P01383](#).

<sup>1415</sup> [REDACTED]; BABIĆMilan:[P01243](#), p.16; BABIĆMilan:[P01248](#), T.1384. See also [P02443](#), p.5-6. Following this early example, similar provocations were committed against Croats in Krajina throughout the Indictment period, with the tacit approval and sometimes participation of MARTIĆ and the SAO-Krajina and RSK authorities. Cross-reference Section [III.B.1\(a\)](#),(d).

December 1990 the SerbianDB reported that ARKAN had been sent to Croatia with MILOŠEVIĆ's approval to provoke an incident with Croatian police.<sup>1416</sup>

(ii) Krajina Serbs organised their parallel Serb government structures following MILOŠEVIĆ's strategy

323. In autumn 1990, MILOŠEVIĆ covertly steered BABIĆ and the Krajina Serbs towards adopting his strategy for establishing homogeneous Serb territories. Following the referendum held on MILOŠEVIĆ's instructions in August,<sup>1417</sup> the SNC declared the autonomy of the Serb people in Krajina in September,<sup>1418</sup> and proclaimed the SAO-Krajina in December.<sup>1419</sup> KARADŽIĆ congratulated BABIĆ on the proclamation of the SAO-Krajina, assuring him that the BiH SNC would support "state unity of the Serb Autonomous Region of Krajina and all the other Serb regions with the Serbia mother-country within a free, democratic and federative Yugoslavia, regardless of its size".<sup>1420</sup>

324. A central component of MILOŠEVIĆ's strategy, which the Accused helped him enforce,<sup>1421</sup> was to make it appear that Serb-claimed parts of Yugoslavia, which he wished to incorporate into a newly-organised Serb state, passively remained, while the others seceded.<sup>1422</sup> MILOŠEVIĆ instructed that express links to Serbia be minimised to conceal Serbia's true role.<sup>1423</sup> While pushing SAO-Krajina government structures toward alignment with an increasingly Serb-dominated SFRY, MILOŠEVIĆ plotted with co-JCE members to covertly encourage Croatia's secession.<sup>1424</sup> On 17 June 1991, MILOŠEVIĆ remarked to KARADŽIĆ that he was taking steps to "enable" Croatia and Slovenia to separate from Yugoslavia, noting that these two republics were "carrying out these things exactly the way we planned it".<sup>1425</sup> They declared independence eight days later.<sup>1426</sup>

<sup>1416</sup> [P00020](#), p.2.

<sup>1417</sup> Cross-reference Section [II.F.1\(a\)\(i\)b](#).

<sup>1418</sup> BABIĆMilan:[P01243](#), p.13-14; [REDACTED]; [P01270](#).

<sup>1419</sup> [P01264](#), p.1-2; [REDACTED]; BABIĆMilan:[P01560](#), para.14; BABIĆMilan:[P01246](#), T.12865. See AF149. The SAO-Krajina Government was established, replacing the Executive Council, on 29 May 1991. See AF159; [P01266](#); BABIĆMilan:[P01560](#), para.19; BABIĆMilan:[P01246](#), T.12985-12986; [P01576](#); [P01577](#); [P01329](#); [P01522](#); [P01268](#); [P01387](#); [P01524](#); [P01525](#); [P01430](#).

<sup>1420</sup> [P01286](#); BABIĆMilan:[P01248](#), T.1477.

<sup>1421</sup> Cross-reference Section [II.F.4\(a\)\(i\)](#).

<sup>1422</sup> BABIĆMilan:[P01246](#), T.13017-13018,13803-13805,13791-13792; BABIĆMilan:[P01243](#), p.17; ROBERTSIvor:[ID00430](#), para.25,36; [P02443](#), p.4-5,7-8; [P03707](#), p.2; [P03709](#), p.5; [P02883](#), p.3-4; [P02884](#), p.2; [P02902](#), p.3. See NIELSENChristian:[P00850](#), para.266; [P01267](#), p.1; [P03426](#); AF74; AF157.

<sup>1423</sup> BABIĆMilan:[P01243](#), p.17; BABIĆMilan:[P01248](#), T.1414-1415.

<sup>1424</sup> [P01440](#); [REDACTED]; BABIĆMilan:[P01246](#), T.13046-13047,13805.

<sup>1425</sup> [P01440](#); [REDACTED]; BABIĆMilan:[P01246](#), T.13046-13047.

<sup>1426</sup> See AF716.

325. MILOŠEVIĆ's strategy for SAO-Krajina was part of a larger plan, which had to remain hidden from the international public, for linking Serb territories across Croatia and BiH in furtherance of the CCP.<sup>1427</sup> This strategy required careful coordination among JCE members in BiH and Croatia. Thus, KARADŽIĆ and MILOŠEVIĆ were both furious<sup>1428</sup> when BABIĆ led an initiative on 27 June 1991 for a declaration unifying the Bosnian Krajina region with the SAO-Krajina.<sup>1429</sup> MILOŠEVIĆ summoned BABIĆ to a meeting at his office with KARADŽIĆ,<sup>1430</sup> and explained that formally unifying the Krajinas, which had majority Serb populations,<sup>1431</sup> would disrupt their plans to take over territory in BiH where Serbs constituted a *minority*.<sup>1432</sup> Quite simply, this move risked early international censure and could not achieve the same territorial gains in BiH as KARADŽIĆ's and MILOŠEVIĆ's longer-term plan.<sup>1433</sup> BABIĆ acquiesced, demonstrating the extent of MILOŠEVIĆ's authority in advancing the CCP as a whole.<sup>1434</sup>

(b) The Accused and co-JCE members prepared Serb Forces to implement the CCP

(i) The Accused directed MARTIĆ in establishing separate Serb police and security structures in SAO-Krajina

326. While the Accused and MILOŠEVIĆ directed the Krajina Serbs in establishing parallel government structures in Krajina, they worked with BABIĆ and MARTIĆ to establish the SAO-KrajinaMUP.<sup>1435</sup> The SAO-Krajina authorities under BABIĆ officially established the SAO-KrajinaMUP on 4 January 1991, with MARTIĆ as its head.<sup>1436</sup> In pursuit of the CCP, the Accused instructed, financed, armed, and supplied MARTIĆ as

<sup>1427</sup> ROBERTSIvor:T.20,45,53-55,88(15-Oct-2019); ROBERTSIvor:[1D00432](#), p.62; [REDACTED]; ROBERTSIvor:[1D00430](#), para.48.

<sup>1428</sup> [P01447](#), p.1-3. See also [P03722](#), p.3(the Prosecution submits that—based on its contents—this intercept was misdated, and in fact dates from 6 September 1991).

<sup>1429</sup> [P01271](#); BABIĆMilan:[P01248](#), T.1494; [P01445](#), p.2-4.

<sup>1430</sup> BABIĆMilan:[P01246](#), T.13055.

<sup>1431</sup> BABIĆMilan:[P01246](#), T.13055,13062-13063,13805,13808-13812; [REDACTED].

<sup>1432</sup> [REDACTED].

<sup>1433</sup> [P01482](#); [REDACTED].

<sup>1434</sup> BABIĆMilan:[P01246](#), T.13058-13059,13062-13063; [REDACTED].

<sup>1435</sup> Initially established as the SAO-KrajinaSUP on 4 January 1991, it was already referred to as SAO-KrajinaMUP on 19 January 1991, and officially renamed on 29 May 1991. For ease of reference, the term "SAO-KrajinaMUP" is used throughout this Brief. See [P01308](#); [P03424](#); [P01522](#), p.1-2; NIELSENChristian:[P00850](#), para.325,327,339.

<sup>1436</sup> [P01309](#); [P01310](#); [P01308](#); BABIĆMilan:[P01243](#), p.16; BABIĆMilan:[P01248](#), T.1407; THEUNENSReynaud:[P01980](#), p.205. See AF151.



he established Serb police stations to claim Serb control over territory and police units to use in operations expelling non-Serbs.

a. STANIŠIĆ, SIMATOVIĆ, and MARTIĆ established, supplied, financed, and armed SAO-Krajina police

327. After the declaration of SAO-Krajina, in 1991 the Accused instructed MARTIĆ on establishing Serb police stations to extend Serb control over Croat majority areas that lay between territories already under Serb control.<sup>1437</sup> [REDACTED],<sup>1438</sup> STANIŠIĆ promised MARTIĆ that he would [REDACTED]—which was setting up Serb police stations.<sup>1439</sup> STANIŠIĆ instructed MARTIĆ to establish police stations in villages where the majority of the inhabitants were Serb and which were not directly connected to Knin, in order to eventually link up and expand the Serb territories in SAO-Krajina.<sup>1440</sup> [REDACTED].<sup>1441</sup> Once STANIŠIĆ approved, MARTIĆ established Serb police stations in Knin, Benkovac, Obrovac, Lika, Donji Lapac, and Korenica.<sup>1442</sup> Police stations already existed in these locations, but MARTIĆ placed Serbs in charge.<sup>1443</sup>

328. As head of the SAO-KrajinaMUP, MARTIĆ had authority over the SAO-Krajina police,<sup>1444</sup> which became known as “MARTIĆ’s Police”—also known as *Martićevci* or *Milicija Krajina*.<sup>1445</sup> These police forces would later play a prominent role among other Serb Forces in murdering, persecuting, and displacing non-Serbs in SAO-Krajina starting in the summer of 1991.<sup>1446</sup>

329. As STANIŠIĆ had promised, the Accused supplied MARTIĆ and his police with everything they would need for operations furthering the CCP and police stations to cement Serb territorial dominance. By November/December 1990, SIMATOVIĆ and his

<sup>1437</sup> [REDACTED]. See also [REDACTED]; [P00009](#)(00:05:07-00:06:19), p.3.

<sup>1438</sup> [REDACTED]; [REDACTED].

<sup>1439</sup> [REDACTED]; [REDACTED]; RFJ-066:T.11(13-Jul-2017).

<sup>1440</sup> [REDACTED]; [REDACTED]; RFJ-066:T.11(13-Jul-2017).

<sup>1441</sup> [REDACTED].

<sup>1442</sup> [P01549](#); [REDACTED]; RFJ-066:T.11(13-Jul-2017); [REDACTED]; BABIĆMilan:[P01246](#), T.13500; [REDACTED]; [REDACTED]. See also [P00570](#), p.3; [REDACTED].

<sup>1443</sup> [REDACTED]. See also [REDACTED]; RFJ-066:T.10(13-Jul-2017).

<sup>1444</sup> [REDACTED]. See also THEUNENSReynaud:[P01980](#), p.212-213; [P03430](#), p.1,4; BABIĆMilan:[P01248](#), T.1393; BABIĆMilan:[P01246](#), T.13156,13500; [REDACTED]; NIELSENChristian:[P00850](#), para.341; MAKSIĆRadoslav:[P00025](#), para.50; [REDACTED]. MARTIĆ’s control also extended to special forces. BABIĆMilan:[P01248](#), T.1406-1407,1410; BABIĆMilan:[P01243](#), p.18; BABIĆMilan:[P01246](#), T.13383; [REDACTED].

<sup>1445</sup> MAKSIĆRadoslav:[P00025](#), para.68; [REDACTED]; [REDACTED]. See also [REDACTED]; AF160.

<sup>1446</sup> Cross-reference Section [II.F.1\(c\)\(ii\)](#)-(iii); Section [III.B.1](#).



operative Rade KOSTIĆ<sub>(DB)</sub> had already started delivering weapons [REDACTED] for police salaries from STANIŠIĆ to MARTIĆ.<sup>1447</sup> [REDACTED].<sup>1448</sup> [REDACTED].<sup>1449</sup> [REDACTED].<sup>1450</sup> [REDACTED].<sup>1451</sup>

330. Through the first half of 1991, [REDACTED],<sup>1452</sup> SIMATOVIĆ and other SerbianDB operatives also delivered truckloads of weapons to MARTIĆ for the SAO-Krajina police and local Serbs.<sup>1453</sup> In addition, the Accused and the SerbianDB supplied the SAO-KrajinaMUP with, *inter alia*, personnel, technical equipment, communications devices, and specialised vehicles,<sup>1454</sup> and covered the costs of training special police units at Golubić.<sup>1455</sup> [REDACTED],<sup>1456</sup> and MARTIĆ noted in July 1991 that “[t]he most significant help came from the Government of Serbia, in almost all forms”.<sup>1457</sup>

b. STANIŠIĆ and SIMATOVIĆ embedded SerbianDB operatives and associates in the SAO-KrajinaMUP structures

331. From its establishment in January 1991, STANIŠIĆ and SIMATOVIĆ used the SAO-KrajinaDB as an extension of the SerbianDB, to “manage [...] the Krajina police, the volunteers units, and units that were directly under their command” and control events in SAO-Krajina.<sup>1458</sup>

<sup>1447</sup> [REDACTED]; RFJ-066:T.21-24(11-Jul-2017); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *Cross-reference* Section [II.F.1\(b\)\(i\)a](#). *See also* [REDACTED].

<sup>1448</sup> [REDACTED]; [REDACTED]; [REDACTED]. *See also* BABIĆMilan:[P01246](#), T.12955,13134. [REDACTED]. *See* [REDACTED].

<sup>1449</sup> [REDACTED]; [REDACTED]; [REDACTED]. *See also* [REDACTED]; BABIĆMilan:[P01246](#), T.12955,13134.

<sup>1450</sup> [REDACTED].

<sup>1451</sup> [REDACTED].

<sup>1452</sup> [REDACTED].

<sup>1453</sup> *Cross-reference* Section [II.E.3\(a\)\(i\)-\(iv\)a](#); [REDACTED]; RFJ-066:T.22-25(11-Jul-2017). *See also* [REDACTED].

<sup>1454</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.12955; [P00242](#), p.1-2(p.1(BCS))(STANIŠIĆ’s initials in the BCS original); AnnexF, p.3; [P00047](#); MAKSIĆRadoslav:[P00025](#), para.79,94; [REDACTED]; [P00218](#); [REDACTED]. POKRAJAC<sub>(DB)</sub> and SIMATOVIĆ also found and removed bugs and listening devices from BABIĆ’s home and office. [REDACTED]; RFJ-066:T.6(23-Aug-2017); BABIĆMilan:[P01246](#), T.13118; BABIĆMilan:[P01248](#), T.1523-1524. *See* [REDACTED]; [REDACTED]; [REDACTED]; [P03054](#), p.1; [REDACTED]. *See also* BABIĆMilan:[P01246](#), T.12961-12964; [P01258](#); [P00043](#); BABIĆMilan:[P01248](#), T.1464.

<sup>1455</sup> BABIĆMilan:[P01246](#), T.13134; [REDACTED]; BABIĆMilan:[P01248](#), T.1545-1546; [REDACTED]; RFJ-066:T.28(10-Jul-2017); [REDACTED].

<sup>1456</sup> *See* [REDACTED].

<sup>1457</sup> [P00021](#), p.4.

<sup>1458</sup> BABIĆMilan:[P01248](#), T.1417-1418,1807-1808; [REDACTED].

332. [REDACTED].<sup>1459</sup> Despite MARTIĆ's positions as head of the SAO-KrajinaMUP and then RSK-MUP, MARTIĆ "was not really in control of the State Security services",<sup>1460</sup> which bypassed MARTIĆ to report directly to the Accused.<sup>1461</sup> By placing SerbianDB associates in key positions, the Accused controlled the SAO-KrajinaDB and maintained control as it became the RSK-DB in 1992:

- Dušan ORLOVIĆ<sub>(DB)</sub>, SAO-KrajinaDB and then RSK-DB Chief, who worked directly for STANIŠIĆ and SIMATOVIĆ and "personified" the SerbianDB;<sup>1462</sup>
- Zoran RAIĆ<sub>(DB)</sub>, original SAO-KrajinaDB member and SIMATOVIĆ's logistics man and confidante, who was also part of the Unit;<sup>1463</sup>
- Aco DRAČA<sub>(DB)</sub>, head of the SAO-KrajinaDB branch at Benkovac, and then head of the RSK-DB;<sup>1464</sup> and
- Miloš PAJIĆ<sub>(DB)</sub>, head of the SAO-KrajinaDB and then RSK-DB centre for Kordun and Banija.<sup>1465</sup>

333. The Accused also embedded their associates in police stations in areas critical to the CCP.<sup>1466</sup>

- Tošo PAJIĆ<sub>(DB)</sub>, [REDACTED] as police chief in Vojnić;<sup>1467</sup> and
- SerbianDB official Dušan MOMČILOVIĆ<sub>(DB)</sub>, who held a field position as police chief in Glina,<sup>1468</sup> and later commanded a RSK-MUP-PJM in the BiH Posavina Corridor operations.<sup>1469</sup>

<sup>1459</sup> [REDACTED]; [REDACTED]; [REDACTED]. *See also* [REDACTED]; [REDACTED].

<sup>1460</sup> [REDACTED].

<sup>1461</sup> RFJ-066:T.32(10-Jul-2017); [REDACTED]; [REDACTED].

<sup>1462</sup> BABICMilan:[P01248](#), T.1417-1418; [REDACTED]; [REDACTED]; RFJ-066:T.32(10-Jul-2017); [REDACTED]; BABICMilan:[P01246](#), T.12928; [P03439](#), p.3-4(ORLOVIĆ<sub>(DB)</sub> was RSK-MUP Assistant Minister); [1D00503](#), p.2(ORLOVIĆ<sub>(DB)</sub>'s RSK-MUP Assistant Minister position corresponded with his being head of the RSK-DB); [P02887](#), p.134.

<sup>1463</sup> [P00234](#), p.15,24; RFJ-066:T.32-34(10-Jul-2017).

<sup>1464</sup> [REDACTED]; [REDACTED]; DRAČAco:T.64-65(27-Nov-2019); [P00817](#), p.3.

<sup>1465</sup> [REDACTED]; [2D00403](#); [REDACTED]; DRAČAco:T.14(3-Dec-2019); [P00588](#), p.1.

<sup>1466</sup> *Cross-reference* Section [II.F.1\(c\)\(ii\)a](#).

<sup>1467</sup> [REDACTED]; [REDACTED]. *See also* [REDACTED]; [2D00403](#); [P00588](#), p.1; [P00589](#).

<sup>1468</sup> [P00160](#), p.30,42,47.

<sup>1469</sup> [P00160](#), p.30,42,47; [P03732](#), p.2; [P02358](#), p.12-13; [P00159](#), p.2; RJS-07:T.25(28-Aug-2019).

c. STANIŠIĆ and SIMATOVIĆ ensured that MARTIĆ remained in charge of the SAO-Krajina police

334. When the SAO-Krajina Government was established on 29 May 1991, the Accused made sure their faithful ally MARTIĆ<sup>1470</sup> maintained his role as head of the SAO-Krajina police. In an attempt to strengthen his own influence vis-à-vis MARTIĆ and the SAO-Krajina police, BABIĆ appointed MARTIĆ as Minister of Defence, a position that was “much less important” than his presumptive appointment as Minister of the Interior.<sup>1471</sup> MARTIĆ initially accepted the post with the proviso that he would still maintain control over the SAO-Krajina special police units at Golubić.<sup>1472</sup> However, STANIŠIĆ and SIMATOVIĆ insisted that he remain Minister of the Interior.<sup>1473</sup> As a result, MARTIĆ refused to hand over the SAO-KrajinaMUP,<sup>1474</sup> securing the SerbianDB’s control—through MARTIĆ—over the regular police as well as the units trained at Golubić and the SAO-Krajina TO, which collectively made up the SAO-Krajina armed forces.<sup>1475</sup> With SIMATOVIĆ’s support, MARTIĆ was formally (re-) appointed Minister of the Interior on 27 June 1991.<sup>1476</sup>

(ii) The Accused established Golubić and other camps, training fighters who implemented the CCP, including the Unit

335. In mid-March 1991, MILOŠEVIĆ tasked Serbia’s government with preparing formations to defend Serb interests outside of Serbia,<sup>1477</sup> and assured BABIĆ that the SMUP would provide training and personnel support to the SAO-KrajinaMUP.<sup>1478</sup> In April, after months of covert coordination organising Krajina to be a Serb-dominated statelet in Croatia, the Accused established their flagship training camp at Golubić. As detailed above, under SerbianDB asset Captain DRAGAN<sub>(DB)</sub>, thousands were trained who would join Serb Forces that were indispensable to achieving the CCP, including the

<sup>1470</sup> See BABIĆMilan:[P01243](#), p.16; BABIĆMilan:[P01246](#), T.13123-13125,13177-13179,13500-13501,13622-13624; [REDACTED]; BABIĆMilan:[P01248](#), T.1434-1437,1525.

<sup>1471</sup> [P01303](#); BABIĆMilan:[P01248](#), T.1406; BABIĆMilan:[P01246](#), T.13156; THEUNENSReynaud:[P01980](#), p.208. See AF159.

<sup>1472</sup> BABIĆMilan:[P01248](#), T.1406. See also AF160.

<sup>1473</sup> BABIĆMilan:[P01248](#), T.1408; BABIĆMilan:[P01246](#), T.13157-13158,13499. See also [REDACTED].

<sup>1474</sup> BABIĆMilan:[P01248](#), T.1408; BABIĆMilan:[P01246](#), T.13157-13158,13499. See also [REDACTED]

<sup>1475</sup> BABIĆMilan:[P01246](#), T.13499; BABIĆMilan:[P01248](#), T.1392. See AF161.

<sup>1476</sup> [P01305](#); BABIĆMilan:[P01246](#), T.13156; BABIĆMilan:[P01248](#), T.1408; THEUNENSReynaud:[P01980](#), p.208; NIELSENChristian:[P00850](#), para.269. See AF159; AF162.

<sup>1477</sup> [P02439](#); NIELSENChristian:[P00850](#), para.436; NIELSENChristian:T.21-22(14-Nov-2017); ANASTASIJEVIĆDejan:[P02423](#), para.20,22; ANASTASIJEVIĆDejan:T.11-12(13-Jun-2018).

<sup>1478</sup> BABIĆMilan:[P01248](#), T.1526-1527,1538-1539,1821; [P01277](#). See also BABIĆMilan:[P01243](#), p.16-17.

SAO-Krajina police and TO, the Unit, and others across BiH and Croatia.<sup>1479</sup> Captain DRAGAN<sub>(DB)</sub> operated under **STANIŠIĆ** and **SIMATOVIĆ** and collaborated with BOGDANOVIĆ regarding his activities at the Golubić camp, cooperating with MARTIĆ and BABIĆ to train volunteers, SAO-Krajina police, and TO members.<sup>1480</sup> After the completion of their training, the troops would operate under the direction of the “parallel structure”,<sup>1481</sup> commanded by **SIMATOVIĆ** in early operations, as described below. Publicly, MARTIĆ represented that he established the training centre in Golubić, thereby preserving the covert nature of the SerbianDB’s involvement.<sup>1482</sup>

336. **STANIŠIĆ** and **SIMATOVIĆ** formed their own Unit at Golubić and established additional Krajina camps at the Knin Fortress, Šamarica, and Korenica, where the Unit trained Serb Forces for the CCP.<sup>1483</sup>

(iii) BABIĆ and MARTIĆ established the SAO-Krajina TO, which the Accused trained to further the CCP

337. As the Accused were establishing Golubić, on 1 April 1991, BABIĆ ordered the mobilisation of the SAO-Krajina TO following the Plitvice clash, discussed below.<sup>1484</sup> Shortly thereafter, TO units began training at Golubić and other training camps established by the Accused,<sup>1485</sup> bolstering the process of creating a Serb-only TO which had started in January 1991.<sup>1486</sup> The SAO-Krajina TO originally operated under MARTIĆ,<sup>1487</sup> who BABIĆ formally appointed Deputy Commander in August 1991, under pressure from MILOŠEVIĆ.<sup>1488</sup> In autumn 1991, after the JNA had entered the conflict on the side of the Serb Forces,<sup>1489</sup> the Serbian MOD, with MILOŠEVIĆ’s approval, sent JNA officers to the Krajina to reorganise the SAO-Krajina TO, bringing it

<sup>1479</sup> Cross-reference Section [II.E.4\(a\)\(i\)](#). See e.g. [P03755](#), p.31; [2D00070](#)(Clip 3, 00:01:05-00:04:39), p.8-10.

<sup>1480</sup> [P01962](#), p.2; [REDACTED]; [REDACTED]; RFJ-066:T.3-4(24-Aug-2017).

<sup>1481</sup> [REDACTED].

<sup>1482</sup> [REDACTED].

<sup>1483</sup> Cross-reference Section [II.E.4\(a\)](#).

<sup>1484</sup> BABIĆMilan:[P01248](#), T.1538-1539; BABIĆMilan:[P01243](#), p.17; [P01277](#).

<sup>1485</sup> [REDACTED]; [REDACTED]. Cross-reference Section [II.E.4\(a\)](#).

<sup>1486</sup> THEUNENSReynaud:[P01980](#), p.206.

<sup>1487</sup> [REDACTED]; [REDACTED]. See also RFJ-066:T.35(10-Jul-2017); RFJ-066:T.35-38(13-Jul-2017); RFJ-066:T.14-15(23-Aug-2017); [REDACTED].

<sup>1488</sup> [P00054/P01299](#)(duplicates); MAKSIĆRadoslav:[P00025](#), para.95; BABIĆMilan:[P01243](#), p.18; THEUNENSReynaud:[P01980](#), p.209,212-213; NIELSENChristian:[P00850](#), para.269. See AF162.

<sup>1489</sup> Cross-reference Section [II.F.1\(c\)\(iii\)](#).

under the JNA and the Serbian MOD.<sup>1490</sup> This structure allowed MILOŠEVIĆ to control the SAO-Krajina TO throughout the existence of the SAO-Krajina and later the RSK.<sup>1491</sup> However, the SAO-Krajina TO continued to operate under MARTIĆ.<sup>1492</sup> MILOŠEVIĆ and military authorities in Belgrade, influenced by MILOŠEVIĆ and the “parallel structure”—of which MARTIĆ was part—directly appointed the TO commanders in the Krajina.<sup>1493</sup>

The TO was financed by the JNA/Serbian MOD, and its commanders reported directly to the JNA, not to the government of the Krajina.<sup>1494</sup> The units of the SAO-Krajina TO were under JNA command during the cleansing operations in the second half of 1991.<sup>1495</sup>

(c) The Accused and co-JCE members deployed Serb Forces in attacks implementing the CCP against non-Serbs

338. The first armed clash at Plitvice in late March 1991 kicked off a flurry of activity among JCE members to prepare Serb Forces in Krajina, as detailed above. By June, **SIMATOVIĆ** and Captain DRAGAN<sub>(DB)</sub> were ready to lead the Unit and SAO-Krajina police and TO in successive attacks all around Krajina to expel the Croat community. After the JNA entered the conflict as an overtly Serb force in August 1991, the Accused and their fellow JCE members deployed their forces, including the Unit, in a persecutory campaign, committing violent crimes to displace thousands of non-Serbs by year’s end.

<sup>1490</sup> MAKSIĆRadoslav:T.7,59(22-Jun-2017); MAKSIĆRadoslav:[P00025](#), para.12-13,46,57; [P00026](#); BABIĆMilan:[P01248](#), T.1567; BABIĆMilan:[P01246](#), T.12956,13184-13186,13939-13940; VASILJEVIĆAleksandar:T.11-12(1-Feb-2019); [REDACTED].

<sup>1491</sup> BABIĆMilan:[P01246](#), T.13177-13179,13187-13189. *See also* MAKSIĆRadoslav:[P00025](#), para.46,57.

<sup>1492</sup> MAKSIĆRadoslav:[P00025](#), para.15,22,33,37,95,97,106; [P00058](#), p.1.

<sup>1493</sup> *Cross-reference* Section [II.E.1\(b\)](#). BABIĆMilan:[P01246](#), T.13177-13179,13187-13189,13730-13731; MAKSIĆRadoslav:[P00025](#), para.57; VASILJEVIĆAleksandar:T.11-12(1-Feb-2019); [REDACTED]. BABIĆ formalised decisions to appoint TO commanders, which were taken by the “competent authorities” in Belgrade. *See* BABIĆMilan:[P01246](#), T.13187-13189; [P00027](#); [P00028](#); [P00033](#); [P01334](#); [P01300/P01340](#)(duplicates); [P01345](#); [P01347](#); [P01370](#); [P01372](#); [P01349](#); [P01371](#); [P01356](#); [P01390](#); [P00036](#); [P00035](#); [P01358](#); [P01392](#); [P01353](#); [P01350](#); [P01352](#).

<sup>1494</sup> BABIĆMilan:[P01246](#), T.12956,13187-13189,13939-13940; MAKSIĆRadoslav:[P00025](#), para.15,46,57; [P00055](#).

<sup>1495</sup> BABIĆMilan:[P01246](#), T.13187-13189,13939-13940; MAKSIĆRadoslav:[P00025](#), para.40,48; MAKSIĆRadoslav:T.64(21-Jun-2017); MAKSIĆRadoslav:T.2(22-Jun-2017). *Cross-reference* Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(c\)\(i\)](#)-(iv)a.

(i) With MILOŠEVIĆ and the SerbianDB’s endorsement, MARTIĆ provoked the first armed clash to establish a Serb police station in Plitvice

339. Consistent with the plan to expand the Serb-controlled territories by establishing Serb police stations,<sup>1496</sup> in late March 1991, BABIĆ asked MARTIĆ to establish a police station in Plitvice to take control of Plitvice National Park.<sup>1497</sup> With his deployment of police forces in combat formation, MARTIĆ provoked the first armed clash between the SAO-Krajina police and the Croatian police in late March 1991.<sup>1498</sup> The JNA did not prevent the clash, but instead “fanned the flames” when it arrived at the park with tanks.<sup>1499</sup> It intervened and separated the two sides only several hours later,<sup>1500</sup> after one man had been killed on the Serb side and the Croatian police had arrested Goran HADŽIĆ and Borivoje SAVIĆ,<sup>1501</sup> which further increased tensions between Croats and Serbs throughout Croatia.<sup>1502</sup> The JNA maintained this buffer in Plitvice until the end of August, when it, together with the Unit under SIMATOVIĆ’s command, expelled the Croatian police, causing the Croat population to flee the area.<sup>1503</sup>

340. MARTIĆ prepared the Plitvice operation at Golubić under the SerbianDB’s close scrutiny.<sup>1504</sup> Without revealing Serbia’s role in the operation, MILOŠEVIĆ publicly defended MARTIĆ’s actions at Plitvice as “a way of protecting the interests of the Serbian people who live there”,<sup>1505</sup> while maintaining his pretense of pursuing peaceful

<sup>1496</sup> See e.g. [REDACTED].

<sup>1497</sup> BABIĆMilan:P01248, T.1510; BABIĆMilan:P01246, T.13113-13114; NIELSENChristian:P00850, para.334; [REDACTED]. See also P02443, p.2-3; ANASTASIJEVIĆDejan:T.19-20(13-Jun-2018); P01552.

<sup>1498</sup> NIELSENChristian:P00850, para.333; P02443, p.2-3; BABIĆMilan:P01248, T.1510-1511; BABIĆMilan:P01246, T.13113-13114,13872-13873,13875-13876; VUKOVIĆVlado:P00196, T.2722,2729; [REDACTED]; 1D00024, p.10-11; P00232(00:03:48-00:04:18), p.2; P00335(00:02:26-00:02:46), p.3; P00359. See AF153. See also [REDACTED].

<sup>1499</sup> VUKOVIĆVlado:P00196, T.2688.

<sup>1500</sup> BABIĆMilan:P01246, T.13114,13873-13874; BABIĆMilan:P01248, T.1511-1512; [REDACTED]. See AF153. See also [REDACTED]; [REDACTED].

<sup>1501</sup> [REDACTED]; NIELSENChristian:P00850, para.335; SAVIĆBorivoje:P00449, para.63-69; SAVIĆBorivoje:T.54(14-Sep-2017); [REDACTED]; BABIĆMilan:P01246, T.14071; P00013.

<sup>1502</sup> P00359; NIELSENChristian:P00850, para.275; SAVIĆBorivoje:P00449, para.68-69,71,202; [REDACTED]; P00497; P00242, p.3; P01552. Cross-reference Section II.F.2(d)(i); Section III.B.2(a).

<sup>1503</sup> BABIĆMilan:P01246, T.13114; BABIĆMilan:P01248, T.1511-1512; [REDACTED]; [REDACTED]; [REDACTED]; P00261, p.5. Cross-reference Section III.B.1(c)(iii).

<sup>1504</sup> BABIĆMilan:P01246, T.13114,13874; [REDACTED].

<sup>1505</sup> P02443, p.4; ANASTASIJEVIĆDejan:T.19-20(13-Jun-2018).



solutions.<sup>1506</sup> Nevertheless, Croatian President Franjo TUĐMAN held MILOŠEVIĆ responsible.<sup>1507</sup>

341. Emboldened by MILOŠEVIĆ's promise that the JNA would protect Serb territory in the Krajina,<sup>1508</sup> on 1 April 1991 BABIĆ sent a request to, *inter alia*, the JNA Command Staff asking for the "complete withdrawal of aggressor and terrorist forces of MUP of [the] so-called Republic of Croatia, from the territory".<sup>1509</sup> On the same day, BABIĆ ordered the mobilisation of the SAO-Krajina TO and volunteer units, and requested assistance and personnel from the SMUP.<sup>1510</sup>

342. From April, the SAO-Krajina police deployed from Golubić into targeted raids of predominantly Croat villages near Knin, including Potkonje, Kninsko Polje, and Vrpolje, which expelled hundreds of Croats.<sup>1511</sup> According to BABIĆ, ORLOVIĆ<sub>(DB)</sub> promoted these discriminatory policies against the Croats.<sup>1512</sup>

(ii) SIMATOVIĆ, MARTIĆ, and Captain DRAGAN<sub>(DB)</sub> commanded early attacks in summer 1991 to forcibly displace Croats

343. From summer 1991, the Accused and co-JCE members deployed forces they trained at Golubić in targeted attacks against Croat villages throughout the Krajina, with the aim of forcibly displacing the non-Serb population to expand Serb territorial control. SIMATOVIĆ personally commanded many of these early operations.

a. Glina/Operation Žaoka

344. The attacks on Glina, Struga, Dvor na Uni, and the surrounding villages were aimed at "establish[ing] Serbian control" by forcing the non-Serb population to flee the area.<sup>1513</sup> On 26 June 1991, Serb volunteer units and the SAO-Krajina police, under Captain DRAGAN<sub>(DB)</sub>'s command, attacked the Glina police station for the first time.<sup>1514</sup>

<sup>1506</sup> [P02443](#), p.7-8.

<sup>1507</sup> [P02443](#), p.5.

<sup>1508</sup> BABIĆMilan:[P01246](#), T.14070. *Cross-reference* Section [II.F.1\(a\)\(i\)b](#).

<sup>1509</sup> [P01328](#); BABIĆMilan:[P01246](#), T.14070.

<sup>1510</sup> BABIĆMilan:[P01248](#), T.1538-1539; BABIĆMilan:[P01243](#), p.17; [P01277](#); [P01328](#).

<sup>1511</sup> *Cross-reference* Section [III.B.1\(a\)](#).

<sup>1512</sup> BABIĆMilan:[P01248](#), T.1418. *See also* [REDACTED].

<sup>1513</sup> [P03236](#); [P03237](#); THEUNENSReynaud:T.22(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.228-229. *See* AF174; AF398. *See also* [P03232](#); [P03059](#); [P03747](#), p.3; [P01985](#), p.2; BIJAKJakub:[P00595](#), p.47,91.

<sup>1514</sup> [2D00915](#), p.3; BABIĆMilan:[P01246](#), T.13907; [P03416](#), p.2. *See also* [P03741](#), p.3-4. *Cross-reference* Section [III.B.1\(b\)\(i\)](#).



The JNA intervened and separated the two sides, dividing the town into a Croat and a Serb part.<sup>1515</sup> SerbianDB operative Dušan MOMČILOVIĆ<sub>(DB)</sub> was installed as head of the newly established Serb Glina SUP that day, placing a SerbianDB operative in a key position for implementing the CCP.<sup>1516</sup>

345. Shortly thereafter, in mid-July, Captain DRAGAN<sub>(DB)</sub> began coordination efforts for Operation Žaoka,<sup>1517</sup> which he launched on 25 July 1991 with the attack on Struga.<sup>1518</sup> On 26 and 27 July, Serb Forces, including the Unit, SAO-Krajina TO, and police, following direct orders of Captain DRAGAN<sub>(DB)</sub>,<sup>1519</sup> attacked the Glina police station that was still held by Croats<sup>1520</sup> to clear “the area of [the remaining] Ustasha forces”.<sup>1521</sup> This time, the Unit played a “leading role in the take-over operation”<sup>1522</sup> and SIMATOVIĆ himself maintained overall command over the Serb Forces.<sup>1523</sup> Around the same time, the Unit also took control over the police station in Dvor na Uni.<sup>1524</sup> Unit members<sup>1525</sup> and police<sup>1526</sup> from the Golubić training camp participated in the attacks, which resulted in Glina’s non-Serb population fleeing the area.<sup>1527</sup>

346. The JNA was officially neutral during these attacks,<sup>1528</sup> but individuals in the JNA coordinated with the Unit to draw the JNA in to support Serb Forces.<sup>1529</sup> Unit member Nikola SIMIĆ<sub>(DB)</sub> was “ordered to be the first to open fire on the army and force them to go against the policemen”<sup>1530</sup>—a tactic that JCE members would repeat in operations to remove non-Serbs from other regions, using the JNA’s purportedly neutral or defensive

<sup>1515</sup> [2D00915](#), p.3. See also [P00844](#); [P03741](#), p.3-4.

<sup>1516</sup> [P00160](#), p.42,47 ; [P03732](#), p.1,6.

<sup>1517</sup> [P01963](#); THEUNENSReynaud:T.21-22(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.226; [P03401](#); [P03402](#), p.6.

<sup>1518</sup> Cross-reference Section [III.B.1\(b\)\(i\)](#). See AF179.

<sup>1519</sup> [1D00047](#), p.1; THEUNENSReynaud:T.26-27(7-Mar-2018); [P01982](#). See also [REDACTED].

<sup>1520</sup> [P03741](#); [P03416](#), p.3; [P00271](#)(00:00:00-00:00:58), p.1-2; [P01963](#); [P01966](#); [P00232](#)(00:04:59-00:05:35), p.2-3. See AF170; AF174; AF178-AF179. See also THEUNENSReynaud:[P01980](#), p.226-229; [REDACTED].

<sup>1521</sup> [2D00915](#), p.3.

<sup>1522</sup> THEUNENSReynaud:T.26-27(7-Mar-2018).

<sup>1523</sup> [REDACTED].

<sup>1524</sup> [REDACTED].

<sup>1525</sup> E.g. Ilija VUČKOVIĆ<sub>(DB)</sub>: THEUNENSReynaud:T.26-27(7-Mar-2018); [P03237](#); Saša MEDAKOVIĆ<sub>(DB)</sub>: [P03235](#); Nikola PUPOVAC<sub>(DB)</sub>: [1D00032](#); [REDACTED]; Nikola PILIPOVIĆ<sub>(DB)</sub>: [P00258](#), p.12-13; [REDACTED]; [P00262](#), p.11; Rade BOŽIĆ<sub>(DB)</sub>: [P01985](#); Dragan OLUIĆ<sub>(DB)</sub>: [P00844](#); [P00261](#), p.5; Borjan VUČKOVIĆ<sub>(DB)</sub>: [P03234](#); [P00260](#), p.1,3,5,29. Cross-reference AnnexA. See also [P00500](#), p.3,16; [P03236](#); [P03230](#); [P01154](#); [P03232](#); [P03233](#); [P01986](#); [P00271](#)(00:00:00-00:00:38), p.1-2; [REDACTED]; [P03059](#).

<sup>1526</sup> [REDACTED].

<sup>1527</sup> [P03236](#); [P03237](#); BIJAKJakub:[P00595](#), p.91. See AF174; AF398.

<sup>1528</sup> See AF75; AF178-AF179. See also BABIĆMilan:[P01248](#), T.1447-1448.

<sup>1529</sup> See e.g. [P01967](#); [P01966](#), p.1; [P03231](#); [P03741](#), p.1,3,6. See also [P01986](#); [2D00139](#), p.1.

intervention to establish Serb control over “territories that were envisaged as the future Serb state”.<sup>1531</sup>

347. Through Captain DRAGAN<sub>(DB)</sub> and the “parallel structure”, **SIMATOVIĆ** played a leading role in preparations for Operation Žaoka:

- Captain DRAGAN<sub>(DB)</sub> and the Dvor na Uni War Staff, which was closely linked to the 7<sup>th</sup> Banija volunteer division operating under **SIMATOVIĆ** and the “parallel structure”,<sup>1532</sup> established headquarters and a training centre in Šamarica in June 1991.<sup>1533</sup>
- On 19 July 1991, Captain DRAGAN<sub>(DB)</sub> reported to “Frenki” and “Major Fića”, among others, that he was coordinating “Chetniks” and “regular police and reserve forces” in preparation for an attack, and confirming that “[t]he setting up of headquarters and the enlisting of soldiers for training [was] under way”.<sup>1534</sup>
- Unit members conducted this training, preparing local TO forces for the operation.<sup>1535</sup>
- On 21 July 1991, the SAO-Krajina TO reported to “Frenki” and others that “[t]he situation [was] improving in Banija, the Captain [was] working according to the plan.”<sup>1536</sup>

348. **SIMATOVIĆ**’s decisive command role in the attack on Glina and the wider offensive around Lika, Kordun, and Banija is evident from the reporting of the Serb Forces who participated in the attacks:

<sup>1530</sup> [P01986](#), p.1. *See also* [P03235](#).

<sup>1531</sup> BABIĆMilan:[P01248](#), T.1416,1515,1567; BABIĆMilan:[P01246](#), T.13501,13973-13974,13089-13091; [REDACTED]. *See also* [P02439](#), p.1-2.

<sup>1532</sup> BABIĆMilan:[P01246](#), T.13383,13388(Bogdan VAJAGIĆ commanded the 7<sup>th</sup> Banija Division, which reported through the parallel structure to **SIMATOVIĆ**); BABIĆMilan:[P01248](#), T.1574-1575,1595; [P03416](#), p.3(VAJAGIĆ commanded the Dvor na Uni War Staff); [P01964](#); [P03741](#), p.3(Captain DRAGAN<sub>(DB)</sub>’s press conference after Žaoka refers to the Unit’s cooperation with the group in Dvor na Uni under Bogdan “VAGIĆ”, which must be Bogdano VAJAGIĆ of the 7<sup>th</sup> Banija Division and Dvor na Uni War Staff); [P03722](#), p.3(the Prosecution submits that—based on its contents—this intercept was misdated, and in fact dates from 6 September 1991). *See also* BABIĆMilan:[P01248](#), T.1445-1446.

<sup>1533</sup> THEUNENSReynaud:T.21-22(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.226; [P01963](#); [P03416](#), p.2-3(VAJAGIĆ commanded the Dvor na Uni war staff, founded in Šamarica, which appointed a centre for training special units); [1D00813](#). *See also* [P03401](#); [P03402](#), p.6.

<sup>1534</sup> [P01963](#); THEUNENSReynaud:T.21-22(7-Mar-2018). *See also* [P03074](#).

<sup>1535</sup> [2D00139](#), p.1; [P03233](#); [REDACTED].

<sup>1536</sup> [P03074](#).

- According to a report from the Chief of the War Staff in Dvor, there was a dual chain of reporting at this time to both the SAO-Krajina and the Republic of Serbia authorities<sup>1537</sup> and numerous SAO-Krajina TO reports from July and August 1991 were addressed to the highest civilian and military command authorities within the SAO-Krajina—the President of the National Defence Council, the Secretary of the SUP, the commander of the TO—and **SIMATOVIĆ**.<sup>1538</sup>
- **SIMATOVIĆ** received reports specifically related to the Glina attack from the SAO-Krajina TO.<sup>1539</sup>
- After the Unit members submitted their reports on operations,<sup>1540</sup> **SIMATOVIĆ** reported that “[t]actical tasks are mostly fulfilled and SAO Krajina formations go to their defence positions of the ethnical region.”<sup>1541</sup>

b. Ljubovo

349. Between the two attacks on Glina, the SAO-Krajina police and members of the Unit, under the command of **SIMATOVIĆ** and Captain DRAGAN<sub>(DB)</sub>, attacked Ljubovo on 2 July 1991, with the aim of driving out the non-Serb population. The Croatian MUP was stationed there following the conflict in Plitvice, and this attack increased ethnic tensions.<sup>1542</sup>

c. Lovinac

350. **SIMATOVIĆ** also commanded the Unit in the field, executing the CCP on the ground in attacks on Croat villages. [REDACTED], **SIMATOVIĆ** planned the operation to expel the non-Serb population from Lovinac as part of an effort to link up Serb-held territories on opposite sides of Lovinac.<sup>1543</sup> On 5 August 1991, **SIMATOVIĆ** and

<sup>1537</sup> [P01964](#).

<sup>1538</sup> THEUNENSReynaud:T.23-24(7-Mar-2018). Reports copied to “Frenki” include: [P01965](#); [P03074](#); [P03076](#); [P01966](#); [P01967](#); [P03077](#); [P01968](#); [P03078](#); [P03079](#); [P03080](#); [P00241](#); [P00048](#); [P03081](#); [P02984](#). Details in [P03079](#), [P03080](#), and [P00241](#) are corroborated by MLADIĆ notebook entries from 2, 3, and 4 August 1991: [P02885](#), p.113,121,125,128. *See also* [REDACTED].

<sup>1539</sup> [P01966](#); [P01967](#); [P01968](#). *See also* [P01965](#); THEUNENSReynaud:T.24(7-Mar-2018). Details in [P01968](#) are corroborated by a MLADIĆ notebook entry from 30 July 1991: [P02885](#), p.100-104.

<sup>1540</sup> [P01986](#); [P01985](#); [P00844](#); [P03230](#); [P03231](#); [P03232](#); [P03235](#); [P03236](#); [P03237](#); [1D00032](#); [P03059](#); THEUNENSReynaud:P01980, p.226-229; NIELSENChristian:P00850, para.344.

<sup>1541</sup> [P00843](#); NIELSENChristian:T.45-46(15-Nov-2017).

<sup>1542</sup> [REDACTED]; [REDACTED]; [P01555](#); [P00261](#), p.5; [REDACTED]. *See* AF174; AF176. *Cross-reference* Section [III.B.1\(b\)\(ii\)](#).

<sup>1543</sup> [REDACTED]; [P00217](#)(BCS)(signed by **SIMATOVIĆ**).

MARTIĆ led Unit members, SAO-Krajina police, and SAO-Krajina TO units in attacking the Croat village of Lovinac.<sup>1544</sup> They used mortars and an armoured train built on **SIMATOVIĆ**'s request,<sup>1545</sup> with a crew trained at Golubić<sup>1546</sup> that was operating under **SIMATOVIĆ**'s command.<sup>1547</sup> The armoured train was meant to "intimidate people and drive them to leave the area".<sup>1548</sup>

351. Shortly after this attack, MILOŠEVIĆ recalled **SIMATOVIĆ** to Belgrade after a power struggle with BABIĆ,<sup>1549</sup> which led BABIĆ to complain to MILOŠEVIĆ that "Frenki was the boss up there".<sup>1550</sup> MILOŠEVIĆ sent **SIMATOVIĆ** back to Krajina a few weeks later,<sup>1551</sup> insisting to BABIĆ that **SIMATOVIĆ** "needs to be down there [...] [h]e's a good man".<sup>1552</sup>

352. Shortly after his return to the area, in September 1991 **SIMATOVIĆ** commanded the Unit based at Korenica camp in a second Lovinac attack, completing the expulsion operation alongside the JNA.<sup>1553</sup> Following the attacks, **SIMATOVIĆ** bragged about how he had "razed" Lovinac.<sup>1554</sup> [REDACTED].<sup>1555</sup>

(iii) From August 1991, JCE members implemented the CCP in Krajina in operations with the JNA

353. In August 1991, the JNA abandoned any further pretense of neutrality in Croatia. JNA forces crossed the Danube into SBWS on 1 August to implement the CCP there.<sup>1556</sup>

<sup>1544</sup> [P00258](#), p.12; [P00048](#), p.2; BABIĆMilan:[P01246](#), T.13068-13069; [REDACTED]; [P03747](#), p.3. See AF175. Cross-reference Section [III.B.1\(b\)\(iii\)](#).

<sup>1545</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13748; [P00217](#)(BCS)(signed by **SIMATOVIĆ**). See also [REDACTED].

<sup>1546</sup> [P00318](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00317](#), p.1,5-6,11; [REDACTED]; [P00380](#).

<sup>1547</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13404; [P00217](#)(BCS)(signed by **SIMATOVIĆ**); [P00317](#), p.6; [REDACTED].

<sup>1548</sup> [REDACTED]; [REDACTED]. See also [REDACTED]; [REDACTED]; [P00380](#); [P00381](#).

<sup>1549</sup> BABIĆMilan:[P01246](#), T.13161-13164,13748-13750. See also [2D00070](#)(Clip 2, 00:02:44-00:03:55)(Clip 3, 00:00:00-00:00:40)(Clip 3, 00:01:05-00:04:30), p.4-5,7,9-10.

<sup>1550</sup> BABIĆMilan:[P01246](#), T.13163-13164.

<sup>1551</sup> BABIĆMilan:[P01246](#), T.13128,13164; [REDACTED]; BABIĆMilan:[P01248](#), T.1430-1432. See also [REDACTED].

<sup>1552</sup> BABIĆMilan:[P01246](#), T.13164,13181,13650-13651; [REDACTED].

<sup>1553</sup> BABIĆMilan:[P01248](#), T.1431-1433,1603-1604; BABIĆMilan:[P01246](#), T.13395-13396,14095-14096; [P00056](#). See also [REDACTED]; [P00187](#).

<sup>1554</sup> BABIĆMilan:[P01248](#), T.1431-1433,1603-1604.

<sup>1555</sup> [REDACTED]; [REDACTED].

<sup>1556</sup> Cross-reference Section [II.F.2\(h\)\(i\)](#); Section [II.E.1\(c\)](#).

In Krajina, on 26 August, MARTIĆ and MLADIĆ<sup>1557</sup> led the JNA, SAO-Krajina police, TO, and Unit members—including individuals trained at Golubić—in an attack on Kijevo to expel its non-Serb population and advance the CCP.<sup>1558</sup> At the time of the attack, “Kijevo was inhabited by Croats only” and its “Croatian population [...] did not pose a threat to the Serbs”.<sup>1559</sup>

354. [REDACTED].<sup>1560</sup> [REDACTED]<sup>1561</sup> As a result, the remaining Croats fled the destroyed village, which was left deserted.<sup>1562</sup> MILOŠEVIĆ and STANIŠIĆ protected MARTIĆ and enabled him to carry out the Kijevo attack without interference.<sup>1563</sup> BABIĆ and MLADIĆ revealed their determination to continue the cleansing campaign in interviews near Kijevo immediately after the attack, with BABIĆ proclaiming “[t]his will be Serbian territory” and MLADIĆ bragging that those who supported Croatia would end up like the destroyed homes behind him.<sup>1564</sup>

355. After Kijevo, JCE members regularly deployed the JNA alongside other Serb Forces to cleanse non-Serbs from SAO-Krajina through a series of coordinated attacks through the second half of 1991,<sup>1565</sup> following the same pattern of murder, persecution and forcible displacement that characterised the Kijevo attack.<sup>1566</sup> As BABIĆ stated:

[these forces] engaged in combat operations in such a way that [...] it forced the population and members of the armed forces of the Croatian government and the entire population to withdraw and retreat from those territories. In this way, the JNA [...] engaged in a war so that the

<sup>1557</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13182-13184,13651,13960; BABIĆMilan:[P01244](#), para.15; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See AF183. See also [P01968](#), p.2; [REDACTED]; BABIĆMilan:[P01243](#), p.19; BABIĆMilan:[P01246](#), T.14105; [ID00024](#), p.10; AF60; AF99; AF105; AF168; AF170; AF174.

<sup>1558</sup> Cross-reference Section [III.B.1\(c\)\(i\)](#). [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13960; [ID00024](#), p.11-12; [P00260](#), p.29; [REDACTED]. See AF181; AF183. See also [P02885](#), p.153; MAKSIĆRadoslav:[P00025](#), para.80.

<sup>1559</sup> [REDACTED].

<sup>1560</sup> [REDACTED]; [REDACTED].

<sup>1561</sup> [REDACTED].

<sup>1562</sup> [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13182-13183.

<sup>1563</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13181,13650-13651.

<sup>1564</sup> [P00351](#)(00:00:20-00:01:43), p.1-2; [REDACTED]. See also [REDACTED]; BABIĆMilan:[P01246](#), T.13183; [REDACTED].

<sup>1565</sup> Cross-reference Section [III.B.1\(c\)\(i\)-\(iv\)](#). See also BABIĆMilan:[P01244](#), para.15; [REDACTED]; [REDACTED]; [REDACTED]; [P00351](#)(00:01:22-00:01:50), p.2; MAKSIĆRadoslav:[P00025](#), para.48,80,82-83,85; MAKSIĆRadoslav:T.64(21-Jun-2017); MAKSIĆRadoslav:T.2(22-Jun-2017); [P00052](#)(00:22:07-00:28:52), p.15,17,18,20,22; AF99; AF105; AF168; AF170; AF174.

<sup>1566</sup> BABIĆMilan:[P01248](#), T.1572-1574; [REDACTED]; BABIĆMilan:[P01246](#), T.13064-13065,13501,14105; [REDACTED]. See AF170-AF171; AF174. See also [P00499](#)(Clip 2, 00:01:10-00:01:18), p.1; [ID00024](#), p.10.

territories it captured would be left without any Croatian inhabitants, or very few of them.<sup>1567</sup>

356. The CCP was implemented by MLADIĆ's JNA 9<sup>th</sup> Corps, in coordination with municipal TO units, SAO-Krajina police units, and units under the control of the SerbianDB.<sup>1568</sup> JNA units led the operation with artillery and heavy weapons targeting predominantly Croat villages that did not pose a threat to the JNA or the Serbs in the region.<sup>1569</sup> SAO-Krajina TO and/or police units would then enter the villages after the JNA had taken over the terrain and passed through the area,<sup>1570</sup> looting the property and torching the houses of the non-Serb population.<sup>1571</sup> Elderly non-Serbs who stayed behind were killed and their deaths were not investigated.<sup>1572</sup> MLADIĆ later boasted to the RS Assembly about the success of this campaign when he was appointed to command the VRS.<sup>1573</sup>

357. Thus, from August to December 1991, in joint operations with the JNA, Serb Forces armed and trained by the Accused and MARTIĆ in the Krajina,<sup>1574</sup> implemented the CCP in Krajina, murdering hundreds and displacing thousands of non-Serbs.<sup>1575</sup>

- From August to December 1991, Serb Forces—including SAO-Krajina police and TO, the 7<sup>th</sup> Banija volunteer division (operating under **SIMATOVIĆ** and MARTIĆ while based at Šamarica camp until the end of September), and the JNA—repeatedly attacked Hrvatska Kostajnica municipality and brutally killed, mistreated, and tortured many non-Serb civilians, leaving the area “completely destroyed and without any inhabitants”.<sup>1576</sup>
- From at least August to November 1991, Serb Forces—including a Golubić-trained SAO-Krajina special police unit under Nikola MEDAKOVIĆ, a regular

<sup>1567</sup> BABIĆMilan:[P01246](#), T.13064.

<sup>1568</sup> MAKSIĆRadoslav:[P00025](#), para.48,80; MAKSIĆRadoslav:T.64(21-Jun-2017); MAKSIĆRadoslav:T.2(22-Jun-2017); [REDACTED]; BABIĆMilan:[P01246](#), T.13064,13397-13399,14095-14096; BABIĆMilan:[P01248](#), T.1431-1433,1604.

<sup>1569</sup> BABIĆMilan:[P01248](#), T.1573; [REDACTED]; BABIĆMilan:[P01246](#), T.13064-13066; MAKSIĆRadoslav:[P00025](#), para.82-83; [P00049](#), p.2; [P00050](#), p.6.

<sup>1570</sup> MAKSIĆRadoslav:[P00025](#), para.48,71.

<sup>1571</sup> BABIĆMilan:[P01248](#), T.1574; BABIĆMilan:[P01246](#), T.13066.

<sup>1572</sup> BABIĆMilan:[P01246](#), T.13066-13069.

<sup>1573</sup> DONIARRobert:[P01597](#), p.84; [P01249](#), p.42; DONIARRobert:T.52(30-Jan-2018).

<sup>1574</sup> Cross-reference Section [II.E.3\(a\)\(i\)-\(iv\)a](#); Section [II.E.4\(a\)](#); Section [II.F.1\(b\)\(i\)a](#); Section [II.F.1\(b\)\(ii\)](#). See also e.g. [REDACTED]; BABIĆMilan:[P01248](#), T.1545-1546.

<sup>1575</sup> Cross-reference Section [III.B.1\(c\)](#). See also e.g. [REDACTED]; [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.80. See AF170-AF171; AF174.

<sup>1576</sup> BABIĆMilan:[P01246](#), T.13393. Cross-reference Section [III.B.1\(c\)\(ii\)](#).



police unit, TO, JNA units, a Plaški DB special sabotage unit, and the Korenica-based Unit under **SIMATOVIĆ**'s direct command—repeatedly attacked predominantly Croat villages in the Saborsko area. They killed and mistreated local Croats, destroyed their houses, and looted their property.<sup>1577</sup>  
 [REDACTED].<sup>1578</sup>

- From September to December 1991, Serb Forces—including the JNA, the Golubić-trained Benkovac SJB special unit, commanded by OPAČIĆ<sub>(DB)</sub>, regular SAO-Krajina police units and the SAO-Krajina TO—repeatedly attacked non-Serbs in Benkovac area, including Škabrnja and Bruška villages and Marinović hamlet. They used non-Serb civilians as human shields, beat, imprisoned, forcibly removed and killed them, looted their houses and destroyed their property, targeting villages with napalm and cluster bombs. Those not killed had no choice but to flee for their lives and no Croats returned to the region before the Croat forces launched Operation Storm in August 1995 to reclaim this territory.<sup>1579</sup>  
 [REDACTED].<sup>1580</sup>

358. These operations were planned and coordinated with the involvement of the Accused and their fellow JCE members. According to SAO-Krajina TO Commander Radoslav MAKSIĆ, the SMUP coordinated all major activities carried out by the SAO-KrajinaMUP from at least October to December 1991, adding:

It is my conviction that all major activities carried out by the SAO Krajina MUP during the time period I was in Krajina were coordinated by the Serbian MUP. I saw two Serbian DB officials in the Krajina during my time there, namely Jovica STANIŠIĆ and Franko (“Frenki”) SIMATOVIĆ.<sup>1581</sup>

359. In fact, during this period, **STANIŠIĆ** and **SIMATOVIĆ**<sup>1582</sup> were present in Krajina several times, *inter alia*, meeting MARTIĆ,<sup>1583</sup> who, together with MLADIĆ,<sup>1584</sup>

<sup>1577</sup> Cross-reference Section [III.B.1\(c\)\(iii\)](#).

<sup>1578</sup> [REDACTED]. See also [P00214](#).

<sup>1579</sup> BABIĆMilan:[P01246](#), T.13408; WILSONJohn:T.16(29-Jun-2017). Cross-reference Section [III.B.1\(c\)\(iv\)](#).

<sup>1580</sup> [REDACTED]. See also [REDACTED].

<sup>1581</sup> MAKSIĆRadoslav:[P00025](#), para.75.

<sup>1582</sup> **STANIŠIĆ** effectively headed the SerbianDB in 1991 and **SIMATOVIĆ** was his “most important man”. Cross-reference Section [II.B.1-2](#).

<sup>1583</sup> MAKSIĆRadoslav:[P00025](#), para.23,75-76; MAKSIĆRadoslav:T.18-20(21-Jun-2017); [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13174-13175; BABIĆMilan:[P01248](#), T.1458-1459,1524-



planned and coordinated these operations.<sup>1585</sup> Moreover, according to **SIMATOVIĆ** himself, a part of the SerbianDB Unit command and an intelligence team from the SerbianDB's 2<sup>nd</sup> Administration provided "important support" and coordination for the forces in these Krajina operations.<sup>1586</sup> Confirming **STANIŠIĆ**'s involvement, **KARADŽIĆ**, in a conversation with **MILOŠEVIĆ** about the combat operations in the area of Kostajnica, Gospić, and Okučani in September 1991, praised **STANIŠIĆ** for having "assessed [the situation] well".<sup>1587</sup>

## ***2. The Accused and their co-JCE members implemented the CCP in SBWS***<sup>1588</sup>

360. Shortly after JCE members had launched their criminal operations in Krajina, and the same month as the JNA's first operation as an openly Serb force there,<sup>1589</sup> JCE members started implementing their campaign to violently take control over and forcibly remove non-Serbs from SBWS in August 1991. Serb Forces, including the JNA, SAO-SBWS TO, ARKAN's SDG, and the Unit conducted a swift, coordinated, and highly effective campaign, taking control over the claimed SBWS territory while killing, persecuting, and forcibly displacing the non-Serb civilian population.<sup>1590</sup> Launched on 1 August 1991 as JNA units crossed into Croatia from Serbia to join local TO in attacking Dalj and Erdut, the operation was completed less than four months later with the fall of Vukovar on 18 November 1991, after a protracted siege—the same date as the deadly Serb Forces' attack on Croats in Škabrnja, Krajina.<sup>1591</sup>

361. The speed and coordinated manner in which this campaign was accomplished resulted from steps taken by the Accused, their subordinates, and co-JCE members in the months prior to August 1991, establishing Serb government, police, security, and military

1525,1545-1546. See also BABIĆMilan:[P01248](#), T.1420; MAKSIĆRadoslav:[P00025](#), para.77; MAKSIĆRadoslav:T.25,34,38(21-Jun-2017); MAKSIĆRadoslav:T.47-49(22-Jun-2017).

<sup>1584</sup> MAKSIĆRadoslav:[P00025](#), para.48,80; MAKSIĆRadoslav:T.64(21-Jun-2017); MAKSIĆRadoslav:T.2(22-Jun-2017); [REDACTED]; BABIĆMilan:[P01246](#), T.13064,13182-13184,13397-13399,13651,13960,14095-14096; BABIĆMilan:[P01248](#), T.1431-1433,1604; BABIĆMilan:[P01244](#), para.15; [REDACTED].

<sup>1585</sup> BABIĆMilan:[P01248](#), T.1438; MAKSIĆRadoslav:[P00025](#), para.69; MAKSIĆRadoslav:T.2-4(22-Jun-2017). See AF198.

<sup>1586</sup> [P00256](#)(00:14:53-00:15:19), p.10. See also BABIĆMilan:[P01246](#), T.13064-13066,13973-13975.

<sup>1587</sup> [P01471](#), p.4,6.

<sup>1588</sup> The SBWS consisted of three regions that are referred to throughout this Section: Baranja, Eastern Slavonia and Western Srem. Generally, Baranja comprised the northern tier, Eastern Slavonia the middle, and Western Srem the southern tier. See [REDACTED]; [REDACTED].

<sup>1589</sup> Cross-reference Section [II.F.1](#).

<sup>1590</sup> Cross-reference Section [III.B.2](#).

structures, and placing key personnel into the positions from which they would ensure implementation of the CCP. Preparations for the CCP were led by the SMUP officials operating outside their official roles through the *vojna linija*, with **STANIŠIĆ** operating at MILOŠEVIĆ's behest. MILOŠEVIĆ and **STANIŠIĆ** met often with HADŽIĆ as they established the Serb government and political framework in SBWS, following the model that had been successful in Krajina. Through their network of SerbianDB operatives and associates in SBWS—most notably KOJIĆ<sub>(DB)</sub> and KOSTIĆ<sub>(DB)</sub>—the Accused established and armed Serb police and TO forces, and organised volunteers throughout the summer of 1991.

362. The Serb Forces operating under the SMUP umbrella, all under **STANIŠIĆ**'s direction from Belgrade, were pivotal to the operations furthering the CCP in SBWS. In August 1991, SMUP official BADŽA arrived with a large contingent of SMUP members and assumed the role of SAO-SBWS TO Commander, continuing to prepare SBWS police and TO forces while concurrently deploying them in the expulsion campaign raging across SAO-SBWS. In addition to BADŽA's SMUP forces, ARKAN arrived with the SDG by July 1991. Sent under the patronage of JCE member BOGDANOVIĆ and **STANIŠIĆ**, ARKAN combined forces with *vojna linija* associates Generals BIORČEVIĆ and IVANOVIĆ in joint ethnic cleansing operations and attacks on non-Serbs.

363. In September 1991, **SIMATOVIĆ** installed the Unit at their Ležimir base, just across the Western Srem border in Serbia, from which he deployed the Unit into the cleansing operations in Western Srem. By early November 1991 he had established a forward command post at Pajzoš, in the centre of the newly cleansed territory.<sup>1592</sup> Operating through the informal *vojna linija* network, **STANIŠIĆ** and BADŽA coordinated the operations of paramilitaries in Western Srem with JNA General ARANĐELOVIĆ. In Baranja, Captain DRAGAN<sub>(DB)</sub> embedded another contingent of the Unit at their Tikveš camp, where they coordinated with [REDACTED] in operations targeting non-Serbs in Bilje.<sup>1593</sup> These forces under SMUP control, or JNA forces closely coordinating with them in the *vojna linija*, violently implemented the CCP across the entirety of SBWS.

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<sup>1591</sup> Cross-reference Section [III.B.1.](#)

<sup>1592</sup> Cross-reference Section [II.F.2\(f\)\(ii\)c.](#)

<sup>1593</sup> Cross-reference Section [II.F.2\(f\)\(ii\)c.](#)

(a) As with BABIĆ and MARTIĆ in Krajina, MILOŠEVIĆ and STANIŠIĆ coordinated with HADŽIĆ to establish separate Serb government structures in SBWS

(i) STANIŠIĆ supported MILOŠEVIĆ in empowering HADŽIĆ and laying the groundwork for separate Serb structures in SBWS

364. The process of establishing separate Serb governing bodies in SBWS mirrored that of the Krajina.<sup>1594</sup> As in Krajina, shortly after the SDS emerged as the leading Serb party in Croatia's multi-party elections in April 1990,<sup>1595</sup> the Serb leadership established the SNC in SBWS, an executive body that was the precursor to the SAO-SBWS government.<sup>1596</sup> As in Krajina, with STANIŠIĆ's support, MILOŠEVIĆ identified suitable local political leaders ready to join and implement their goals in SAO-SBWS. They quickly settled on HADŽIĆ.

365. One month after the multi-party elections, HADŽIĆ, the local SDS leader,<sup>1597</sup> went to Belgrade to meet MILOŠEVIĆ.<sup>1598</sup> With other SDS members, HADŽIĆ travelled to Knin that month to consult with fellow SDS member and Knin Municipality President BABIĆ.<sup>1599</sup> [REDACTED].<sup>1600</sup> Like BABIĆ and other Croatian SDS leaders,<sup>1601</sup> HADŽIĆ frequently met in Belgrade with MILOŠEVIĆ,<sup>1602</sup> who expected to be at the centre of any decisions the party made, especially those affecting the visibility of Serbia's support for Croatian Serbs.<sup>1603</sup>

366. Following the SAO-Krajina model,<sup>1604</sup> in February 1991 the SNC proclaimed the sovereign autonomy of the Serb people of SBWS.<sup>1605</sup> With MILOŠEVIĆ's support,<sup>1606</sup> HADŽIĆ became president of the SNC in March 1991.<sup>1607</sup>

<sup>1594</sup> Cross-reference Section [II.F.1](#).

<sup>1595</sup> DONIA Robert: [P01600](#), p.11.

<sup>1596</sup> See AF360.

<sup>1597</sup> BOGUNOVIĆ Borislav: [P02718](#), para.5; SAVIĆ Borivoje: [P00449](#), para.7,8; BABIĆ Milan: [P01246](#), T.13227,13229; NIELSEN Christian: [P00850](#), para.274; [REDACTED].

<sup>1598</sup> BOGUNOVIĆ Borislav: [P02720](#), T.5972.

<sup>1599</sup> BABIĆ Milan: [P01243](#), p.12.

<sup>1600</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>1601</sup> Cross-reference Section [II.F.1\(a\)](#).

<sup>1602</sup> BOGUNOVIĆ Borislav: [P02720](#), T.5972.

<sup>1603</sup> See SAVIĆ Borivoje: [P00449](#), para.49,51,54; [P01564](#), p.1.

<sup>1604</sup> [P01264](#). Cross-reference Section [II.F.1\(a\)](#).

<sup>1605</sup> [P00453](#), p.2.

<sup>1606</sup> See SAVIĆ Borivoje: [P00449](#), para.89.

<sup>1607</sup> BOGUNOVIĆ Borislav: [P02718](#), para.7; NIELSEN Christian: [P00850](#), para.274.

367. From the beginning, HADŽIĆ advocated uniting all Serbs into a single state, including during his conversations with the SerbianDB.<sup>1608</sup> He publicly rejected co-existence with non-Serbs, promoting separation, while other SNC members promoted dividing territory according to its pre-World War I ethnic composition.<sup>1609</sup>

(ii) STANIŠIĆ, MILOŠEVIĆ, and the SMUP influenced HADŽIĆ and directed Serb policy in SBWS

368. From May to August 1991 HADŽIĆ met more frequently with both MILOŠEVIĆ and STANIŠIĆ.<sup>1610</sup> In HADŽIĆ, MILOŠEVIĆ and STANIŠIĆ found a compliant politician through whom they could shape events in SBWS. BABIĆ, who attended numerous meetings with HADŽIĆ, confirmed that HADŽIĆ was completely under STANIŠIĆ's control and obedient to MILOŠEVIĆ.<sup>1611</sup> SDS Vice President Borislav BOGUNOVIĆ, [REDACTED],<sup>1612</sup> confirmed that those meetings resulted in the SNC implementing various instructions from MILOŠEVIĆ and STANIŠIĆ.<sup>1613</sup>

369. After his consultations with MILOŠEVIĆ, HADŽIĆ informed the SNC that Belgrade supported his appointment as president of the not-yet-formalised SAO-SBWS government.<sup>1614</sup> Thus, when SAO-SBWS was declared in June 1991, HADŽIĆ was selected as president-designate for its Government and announced himself as its president to the domestic and international press in July.<sup>1615</sup>

370. MILOŠEVIĆ and STANIŠIĆ's influence over HADŽIĆ continued following the Serb takeover of Dalj and Erdut in early August 1991, when the ethnic cleansing campaign swept across SAO-SBWS. HADŽIĆ formed his cabinet and held SAO-SBWS Government meetings in Dalj,<sup>1616</sup> [REDACTED].<sup>1617</sup> He continued to consult STANIŠIĆ and members of the Serbian Government in autumn 1991.<sup>1618</sup> STANIŠIĆ

<sup>1608</sup> [REDACTED]; [P00485](#), p.6.

<sup>1609</sup> [P00483](#), p.18,24.

<sup>1610</sup> BOGUNOVIĆBorislav:[P02720](#), T.5973-5974; BOGUNOVIĆBorislav:[P02718](#), para.82.

<sup>1611</sup> BABIĆMilan:[P01246](#), T.13227-13230.

<sup>1612</sup> [REDACTED]. [REDACTED].

<sup>1613</sup> BOGUNOVIĆBorislav:[P02719](#), para.15; BOGUNOVIĆBorislav:[P02720](#), T.5972-5974,6042-6043. *See also* [P00485](#), p.2,6,8.

<sup>1614</sup> BOGUNOVIĆBorislav:[P02718](#), para.6. *See* SAVIĆBorivoje:[P00449](#), para.74.

<sup>1615</sup> NIELSENChristian:[P00850](#), para.280.

<sup>1616</sup> [REDACTED]; NIELSENChristian:[P00850](#), para.289.

<sup>1617</sup> [REDACTED]; [REDACTED].

<sup>1618</sup> BOGUNOVIĆBorislav:[P02719](#), para.11; BOGUNOVIĆBorislav:[P02720](#), T.6004-6005.

also ordered meetings with him in SBWS.<sup>1619</sup> SMUP Minister SOKOLOVIĆ confirmed that HADŽIĆ acted under the SMUP's influence,<sup>1620</sup> as demonstrated when HADŽIĆ surprised SAO-SBWS Government officials by appointing SerbianDB associate KOJIĆ<sub>(DB)</sub> as Minister of Defence in September 1991.<sup>1621</sup> [REDACTED].<sup>1622</sup>

(b) STANIŠIĆ and SIMATOVIĆ exercised authority and influence over Serb structures in SBWS through SerbianDB operatives and associates embedded in positions of authority

371. As in Krajina,<sup>1623</sup> the Accused developed a network of SerbianDB operatives and associates in SBWS, which they used to contribute to the CCP and to ensure they were well-informed. The Accused's most important agents in SBWS were Rade KOSTIĆ<sub>(DB)</sub> and Ilija KOJIĆ<sub>(DB)</sub>, through whom the Accused made many of their JCE contributions, as detailed below.<sup>1624</sup>

372. In addition to KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub>, the following were also part of the Accused's network of SerbianDB operatives and assets in the region:

- [REDACTED].<sup>1625</sup> [REDACTED].<sup>1626</sup>
- [REDACTED].<sup>1627</sup>
- [REDACTED].<sup>1628</sup> [REDACTED],<sup>1629</sup> [REDACTED].<sup>1630</sup>

<sup>1619</sup> [REDACTED]; [REDACTED].

<sup>1620</sup> [REDACTED]; VASILJEVIĆ Aleksandar: T.26(30-Jan-2019).

<sup>1621</sup> BOGUNOVIĆ Borislav: [P02720](#), T.5982-5986; [REDACTED]; [P00454](#); [REDACTED].

<sup>1622</sup> [REDACTED]; [REDACTED].

<sup>1623</sup> Cross-reference Section [II.F.1\(b\)\(i\)](#).

<sup>1624</sup> Cross-reference Section [II.D.1\(b\)](#).

<sup>1625</sup> [REDACTED]. See also [REDACTED]; [REDACTED].

<sup>1626</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1627</sup> Indictment, para.36. [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00580](#), p.2.

<sup>1628</sup> [REDACTED]; BOGUNOVIĆ Nebojša: T.32(4-Sep-2019); [REDACTED]. See [P00831](#), p.48; [REDACTED].

<sup>1629</sup> [REDACTED]; [REDACTED]; [P03092](#), p.2; [REDACTED]; [P03090](#), p.4-5,9; [P00817](#), p.2-3; [P03273](#), p.1.

<sup>1630</sup> [P02600](#), p.10-11(p.9(BCS))(SIMATOVIĆ initialled the report); [REDACTED]. See also [P00842](#), p.3.

- Milan MILANOVIĆ aka MRGUD<sub>(DB)</sub>—an “indisputable” SerbianDB “collaborator”<sup>1631</sup>—who reported to STANIŠIĆ,<sup>1632</sup> and was the “intermediary” commander of the Scorpions.<sup>1633</sup>

373. The Accused engaged numerous other SerbianDB associates and operatives in SBWS police and TO structures and deployed others from Serbia, through whom the Accused gathered information and exercised their influence in SBWS,<sup>1634</sup> advancing the CCP.

(c) The Accused’s SerbianDB associates and co-JCE members armed, equipped, and financed the SAO-SBWS Serbs

374. Even before HADŽIĆ and KOJIĆ had begun seeking weapons from Serbia and establishing armed units, the SerbianDB had been sending weapons to SBWS. At the end of summer 1990,<sup>1635</sup> through his SerbianDB connection, KOJIĆ<sub>(DB)</sub> distributed weapons from Serbia to Serb police and others.<sup>1636</sup>

375. From April/May 1991, KOSTIĆ<sub>(DB)</sub>, KOJIĆ<sub>(DB)</sub>, [REDACTED], and KERTES coordinated an arming scheme that brought large quantities of weapons into Borovo Selo from Serbia and distributed them to Serbs in surrounding villages.<sup>1637</sup> While SIMATOVIĆ was preparing and arming Serb Forces in Krajina,<sup>1638</sup> [REDACTED].<sup>1639</sup> The weapons brought to Borovo Selo through the process KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub> oversaw were used in subsequent persecutory attacks to remove non-Serbs.<sup>1640</sup> [REDACTED].<sup>1641</sup>

<sup>1631</sup> STOPARIĆGoran:T.62-63(8-Nov-2017); SAVIĆBorivoje:T.65-66(12-Sep-2017).

<sup>1632</sup> [P02350](#); [REDACTED].

<sup>1633</sup> [REDACTED]; STOPARIĆGoran:T.62-63,66(8-Nov-2017). *Cross-reference* Section [II.D.2\(c\)](#).

<sup>1634</sup> *E.g.* Slobodan IVKOVIĆ<sub>(DB)</sub>: [REDACTED]; [P00519](#), p.1; [REDACTED]; [REDACTED]. *See also* [REDACTED]. [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. Milenko LEMIĆ<sub>(DB)</sub>: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00807](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.31(4-Sep-2019); [REDACTED]; [REDACTED]. Other SerbianDB operatives and associates: *e.g.* [REDACTED]; [P00519](#), p.3; [P00589](#), p.1; [REDACTED]; [REDACTED].

<sup>1635</sup> *Cross-reference* Section [II.E.3](#).

<sup>1636</sup> *Cross-reference* Section [II.E.3](#).

<sup>1637</sup> *Cross-reference* Section [II.E.3](#). [REDACTED]; RFJ-113:T.45(26-Sep-2017). *See* [REDACTED].

<sup>1638</sup> *Cross-reference* Section [II.E.4\(a\)\(i\)](#); Section [II.F.1\(b\)\(ii\)](#).

<sup>1639</sup> [REDACTED]; BOGUNOVIĆNebojša:T.32-33,35(4-Sep-2019); RFJ-113:T.45(26-Sep-2017). *Cross-reference* Section [II.E.3\(a\)\(iv\)b](#).

<sup>1640</sup> RFJ-113:T.79(28-Sep-2017). *Cross-reference* Section [III.B.2\(c\)\(i\)](#).

<sup>1641</sup> [REDACTED].

376. **STANIŠIĆ** arranged arms shipments for SBWS through the Matica organisation.<sup>1642</sup> The SNC and local Crisis Staffs also arranged weapons distributions, with the knowledge of the SMUP.<sup>1643</sup> ARKAN's men secured convoys of weapons from Serbian TO stores in Belgrade to Slavonia and Baranja, as they were doing in Krajina.<sup>1644</sup>

377. Immediately prior to the 1 August 1991 Dalj attack, KOSTIĆ<sub>(DB)</sub> led a group of 20-30 civilians armed with automatic weapons in crossing from Serbia into Borovo Selo at Vajska; KOSTIĆ<sub>(DB)</sub> presented a permit, signed by BOGDANOVIĆ, enumerating the weapons they carried.<sup>1645</sup> SerbianJB-PJM officers guarding the border [REDACTED] and permitted his group to cross.<sup>1646</sup>

(d) **STANIŠIĆ**, with SMUP and the SerbianDB, established and supported separate Serb TO, police, and state security structures in SBWS

378. From mid-1991, **STANIŠIĆ** used his operatives KOJIĆ<sub>(DB)</sub> and KOSTIĆ<sub>(DB)</sub> to establish the framework for the SBWS police and TO. As TO commander, KOJIĆ<sub>(DB)</sub> led the initial takeovers and expulsions in August 1991. With the arrival of SMUP units shortly thereafter, KOSTIĆ<sub>(DB)</sub> moved to Baranja to set up police, DB and TO structures there, including the [REDACTED] that would be instrumental in expelling non-Serbs from Baranja.

(i) From May 1991, HADŽIĆ, KOJIĆ<sub>(DB)</sub>, and KOSTIĆ<sub>(DB)</sub> began establishing Serb police and TO structures and organising the arriving volunteer formations

379. On 2 May 1991, in an exchange of fire after armed local Serbs attacked Croat policemen in Borovo Selo, 12 Croatian police and one Serb volunteer were killed.<sup>1647</sup> The SNC then announced that there was no alternative but to arm SBWS Serbs and establish volunteer formations.<sup>1648</sup> JCE member ŠEŠELJ's volunteers were instrumental in this early provocation, which ŠEŠELJ discussed with the SerbianDB days later.<sup>1649</sup>

<sup>1642</sup> Cross-reference Section [II.E.3](#).

<sup>1643</sup> BOGUNOVIĆBorislav:[P02720](#), T.6021; BOGUNOVIĆBorislav:[P02719](#), para.25.

<sup>1644</sup> [P00383](#), p.2; [P00384](#), Cross-reference Section [II.E.3\(a\)\(iv\)a](#).

<sup>1645</sup> [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.30(4-Sep-2019).

<sup>1646</sup> [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.22-23(3-Sep-2019).

<sup>1647</sup> [REDACTED]; [REDACTED]; SAVIĆBorivoje:[P00449](#), para.76. See also [REDACTED]; [1D00225](#).

<sup>1648</sup> NIELSENChristian:[P00850](#), para.365.

<sup>1649</sup> [P03037](#).



380. The influx of SRS and other volunteers from Serbia gained momentum after this incident, and continued through mid-July,<sup>1650</sup> with KOJIĆ<sub>(DB)</sub> responsible for arranging their transfer to SBWS.<sup>1651</sup> Between May and July 1991,<sup>1652</sup> HADŽIĆ and KOJIĆ<sub>(DB)</sub> travelled frequently to Serbia to secure weapons and other material and personnel support, working closely with the SMUP, including Vojvodina MUP personnel at border crossings.<sup>1653</sup>

381. Around June 1991, [REDACTED],<sup>1654</sup> [REDACTED].<sup>1655</sup> [REDACTED], KOJIĆ<sub>(DB)</sub> introduced KOSTIĆ<sub>(DB)</sub> as a member of the SerbianDB sent from Belgrade to help KOJIĆ<sub>(DB)</sub> organise and establish the SUP.<sup>1656</sup>

382. [REDACTED],<sup>1657</sup> [REDACTED].<sup>1658</sup> [REDACTED].<sup>1659</sup>

383. By mid-July, HADŽIĆ formalised the SAO-SBWS SUP and TO<sup>1660</sup> and began organizing “defensive preparations in all Serb settlements on the territory of [SBWS]”.<sup>1661</sup> HADŽIĆ formally appointed KOJIĆ<sub>(DB)</sub> commander of the SAO-SBWS TO,<sup>1662</sup> directing the media to announce that separate Serb armed forces, police, and TO were based in Borovo Selo.<sup>1663</sup>

384. [REDACTED]. [REDACTED],<sup>1664</sup> mirroring the work that KOJIĆ<sub>(DB)</sub>, KOSTIĆ<sub>(DB)</sub>, and HADŽIĆ were undertaking in SBWS.

<sup>1650</sup> [REDACTED]; [REDACTED]; [1D00295](#), p.2; [REDACTED]; BOGUNOVIĆNebojša:T.45-46(4-Sep-2019).

<sup>1651</sup> BOGUNOVIĆNebojša:T.50(4-Sep-2019); BOGUNOVIĆNebojša:T.28(3-Sep-2019); [REDACTED]; [REDACTED]; [P01083](#), p.4. *See also* [P00582](#); [P03734](#), p.1.

<sup>1652</sup> [REDACTED]

<sup>1653</sup> [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.40,50(4-Sep-2019); [REDACTED]. *Cross-reference* Section [II.E.3\(a\)\(iv\)b](#).

<sup>1654</sup> *Cross-reference* AnnexA.

<sup>1655</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>1656</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>1657</sup> [REDACTED].

<sup>1658</sup> [REDACTED]; [REDACTED]

<sup>1659</sup> [REDACTED].

<sup>1660</sup> [2D00037](#); [P00572](#).

<sup>1661</sup> NIELSENChristian:[P00850](#), para.281-282. *See also* [REDACTED]; [REDACTED]; [P00571](#).

<sup>1662</sup> [P00572](#), p.2; [1D00295](#), p.1; SAVIĆBorivoje:T.65(13-Sep-2017); [REDACTED]; NIELSENChristian:[P00850](#), para.281-282.

<sup>1663</sup> [2D00037](#); [P00572](#).

<sup>1664</sup> [REDACTED]; [REDACTED]; [REDACTED].

(ii) Through KOJIĆ<sub>(DB)</sub> and KOSTIĆ<sub>(DB)</sub> the SerbianDB supplied the SAO-SBWS police

385. In the weeks preceding the 1 August 1991 takeover of Dalj and Erdut, SerbianDB and SerbianJB officials collaborated to provide covert material support and weapons to the SAO-SBWS police. [REDACTED].<sup>1665</sup> [REDACTED].<sup>1666</sup>

386. [REDACTED].<sup>1667</sup> [REDACTED].<sup>1668</sup>

387. [REDACTED].<sup>1669</sup> [REDACTED].<sup>1670</sup> [REDACTED].<sup>1671</sup>

388. [REDACTED]<sup>1672</sup> The Dalj police station would soon be used as a detention centre where ARKAN, the SDG, the SNB, and others abused non-Serbs before removing and murdering many of them, enabled by the SAO-SBWS police, including KOJIĆ<sub>(DB)</sub>, who guaranteed their impunity.<sup>1673</sup>

(iii) KOSTIĆ<sub>(DB)</sub> established the SAO-SBWS police and DB in Baranja

389. [REDACTED].<sup>1674</sup> [REDACTED].<sup>1675</sup> He continued establishing Serb police stations,<sup>1676</sup> [REDACTED].<sup>1677</sup> [REDACTED].<sup>1678</sup>

390. [REDACTED].<sup>1679</sup>

391. In addition, KOSTIĆ<sub>(DB)</sub> was instrumental in [REDACTED] coordinating the DB in Beli Manastir, [REDACTED].<sup>1680</sup> KOSTIĆ<sub>(DB)</sub> [REDACTED],<sup>1681</sup> [REDACTED]

<sup>1665</sup> [REDACTED]; [REDACTED].

<sup>1666</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>1667</sup> [REDACTED]; [REDACTED].

<sup>1668</sup> [REDACTED].

<sup>1669</sup> [REDACTED]; [REDACTED].

<sup>1670</sup> [REDACTED]; [REDACTED].

<sup>1671</sup> [REDACTED].

<sup>1672</sup> [REDACTED].

<sup>1673</sup> Cross-reference Section [III.B.2\(c\)\(i\)](#).

<sup>1674</sup> [REDACTED]; [REDACTED]

<sup>1675</sup> [REDACTED]. See Annex A.

<sup>1676</sup> Cross-reference Section [II.F.2\(d\)\(i\)](#); [REDACTED].

<sup>1677</sup> [REDACTED]; [REDACTED].

<sup>1678</sup> [REDACTED].

<sup>1679</sup> [REDACTED]; RFJ-151:T.62-63(20-Sep-2017). See [REDACTED].

<sup>1680</sup> [REDACTED]; [REDACTED].

<sup>1681</sup> [REDACTED]. [REDACTED].

ensured that he would report to the SerbianDB in Sombor and Belgrade,<sup>1682</sup> allowing the Accused to remain abreast of how the CCP was unfolding.

(e) BADŽA and SMUP forces deployed to SAO-SBWS in August 1991 to prepare and command SAO-SBWS police and TO units, furthering the CCP

(i) STANIŠIĆ and BADŽA cemented SMUP control over the developing Serb Forces to advance the CCP

392. Shortly after Serb Forces took over Dalj and Erdut in the 1 August 1991 attacks,<sup>1683</sup> BADŽA, a senior SMUP official from the SAJ,<sup>1684</sup> was dispatched from Belgrade to SBWS along with SMUP SAJ and SerbianJB-PJM personnel to assume responsibility for the SAO-SBWS TO and police.<sup>1685</sup> [REDACTED], BADŽA announced that he would head two chains of command, the TO and the police, [REDACTED].<sup>1686</sup>

393. Arriving with BADŽA were two fellow SMUP members: SAJ officer Živko TRAJKOVIĆ became his deputy TO commander,<sup>1687</sup> and [REDACTED].<sup>1688</sup>

394. As commander of the SAO-SBWS TO, BADŽA was in a position to ensure that the armed forces implemented the CCP. As commander of the police he was able to ensure that the police—ostensibly charged with responsibility for investigating and combatting crime—would support the CCP by both tolerating the Serb Forces’ criminal activities and engaging in crimes themselves.

395. In the months that followed, STANIŠIĆ exercised his authority over SAO-SBWS forces “from the shadows”, in Belgrade, while BADŽA was the public face.<sup>1689</sup> As STANIŠIĆ continued to direct HADŽIĆ from Belgrade,<sup>1690</sup> BADŽA fostered a close

<sup>1682</sup> [REDACTED]; RFJ-151:T.42(20-Sep-2017); [REDACTED].

<sup>1683</sup> Cross-reference Section [II.F.2\(h\)\(i\)](#).

<sup>1684</sup> Cross-reference Section [II.C.4](#).

<sup>1685</sup> BOGUNOVIĆBorislav:[P02718](#), para.13,23,73; BOGUNOVIĆBorislav:[P02720](#), T.5989,6013-6014; ANASTASIJEVIĆDejan:[P02423](#), para.84,164; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P03098](#).

<sup>1686</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1687</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P03098](#).

<sup>1688</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1689</sup> VASILJEVIĆAleksandar:T.21-22(6-Feb-2019).

<sup>1690</sup> Cross-reference Section [II.F.2\(a\)\(ii\)](#).

relationship with HADŽIĆ on the ground,<sup>1691</sup> cementing the SMUP's dominance in SBWS.<sup>1692</sup> Together, exercising authority well beyond their competence as MUP officials in Serbia, STANIŠIĆ and BADŽA operated through the *vojna linija* to guide the policies and activities of local TO commanders and police as Serb Forces took control of and expelled non-Serbs from the SBWS territory.<sup>1693</sup>

396. Until [REDACTED] in October 1991,<sup>1694</sup> KOJIĆ<sub>(DB)</sub> complemented BADŽA's role in continuing to prepare SAO-SBWS police and TO forces to further the CCP. BADŽA appointed KOJIĆ<sub>(DB)</sub> as head of the police administration in Slavonia, in which position he continued to exercise authority over the Vukovar SUP,<sup>1695</sup> while also coordinating with BADŽA regarding the SAO-SBWS TO.<sup>1696</sup>

(ii) As SAO-SBWS TO commander, BADŽA oversaw and was responsible for the activities of volunteers and paramilitaries

397. As the Vukovar campaign intensified in autumn 1991, volunteers who arrived in the SBWS<sup>1697</sup> joined local TO members and JNA reservists, all operating under the umbrella of the SAO-SBWS TO.<sup>1698</sup> They received training from, *inter alios*, ARKAN's SDG and the SMUP personnel BADŽA brought.<sup>1699</sup> BADŽA entrusted TRAJKOVIĆ and the TO Staff chief of staff with developing and instituting a training program.<sup>1700</sup>

398. The SAO-SBWS TO Staffs in both Erdut and Šid (Serbia) recruited, trained, and deployed volunteers from Serbia.<sup>1701</sup> BADŽA's SMUP secretary was Chief of Staff at the

<sup>1691</sup> BABIĆMilan:[P01246](#), T.13230; [REDACTED].

<sup>1692</sup> See BOGUNOVIĆBorislav:[P02718](#), para.73; [P02724](#), p.1-2; BOGUNOVIĆBorislav:[P02720](#), T.6005,6047-6048.

<sup>1693</sup> See VASILJEVIĆAleksandar:[P02686](#); VASILJEVIĆAleksandar:[P02689](#); [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.38-39; ANASTASIJEVIĆDejan:T.25-26(13-Jun-2018). *Cross-reference* Section [II.E.1\(a\)](#).

<sup>1694</sup> [REDACTED].

<sup>1695</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; RFJ-041:T.54-55(5-Dec-2017); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1696</sup> [REDACTED]; BOGUNOVIĆNebojša:T.2-3,6(5-Sep-2019); [P00022](#).

<sup>1697</sup> E.g. BOGUNOVIĆBorislav:[P02718](#), para.74; [REDACTED]; [REDACTED].

<sup>1698</sup> [REDACTED]; [REDACTED];[REDACTED].

<sup>1699</sup> *Cross-reference* Section [II.F.2\(f\)\(i\)](#).

<sup>1700</sup> [REDACTED]; BOGUNOVIĆNebojša:T.50(4-Sep-2019); BOGUNOVIĆNebojša:T.41,44(3-Sep-2019).

<sup>1701</sup> SAVIĆBorivoje:[P00449](#), para.140,142; STOPARIĆGoran:[P00796](#), para.4; [P03063](#), p.2.

Šid headquarters for the SAO-SBWS TO, where volunteers were accepted and sent to the Vukovar front daily.<sup>1702</sup>

399. KOJIĆ<sub>(DB)</sub> continued to be involved in recruiting volunteers from Serbia,<sup>1703</sup> coordinating police and TO for operations,<sup>1704</sup> and, as Minister of Defence,<sup>1705</sup> he coordinated the activities of the SAO-SBWS TO Staff with the JNA on behalf of his ministry.<sup>1706</sup>

400. The SAO-SBWS TO under BADŽA operated outside the legitimate SFRY armed forces as essentially a “para-TO”, subordinated neither to the JNA nor the TO command of Serbia.<sup>1707</sup> Not surprisingly, ARKAN’s SDG was placed within this structure, ensuring he would be under the umbrella of military units controlled by the SMUP rather than the JNA. Exercising his *vojna linija* role as a SMUP official coordinating with JNA commanders,<sup>1708</sup> BADŽA deployed the SAO-SBWS TO, police, paramilitaries (including ARKAN), and volunteers in joint ethnic cleansing operations with the JNA.<sup>1709</sup> Since they were professionally trained for such operations, BADŽA’s SMUP personnel commanded and directed the local TO and police forces during the takeover of villages.<sup>1710</sup>

401. BADŽA met with JNA commanders, including those associated with the *vojna linija*, who were receptive to the use of paramilitaries in coordination with the JNA: Života PANIĆ, Andrija BIORČEVIĆ, and Boro IVANOVIĆ.<sup>1711</sup> [REDACTED].<sup>1712</sup> [REDACTED].<sup>1713</sup> [REDACTED].<sup>1714</sup>

<sup>1702</sup> SAVIĆBorivoje:[P00449](#), para.140,142; [P00475](#), p.3.

<sup>1703</sup> [P00582](#).

<sup>1704</sup> E.g. [REDACTED].

<sup>1705</sup> BOGUNOVIĆBorislav:[P02720](#), T.5982; [P00454](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; THEUNENSReynaud:T.51(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.252; NIELSENChristian:[P00850](#), para.473. See [REDACTED]; [P02787](#), p.6.

<sup>1706</sup> BOGUNOVIĆBorislav:[P02718](#), para.56; BOGUNOVIĆBorislav:[P02720](#), T.6025. See also [P03096](#).

<sup>1707</sup> VASILJEVIĆAleksandar:T.43-44,46-47(5-Feb-2019).

<sup>1708</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>1709</sup> [REDACTED]; [REDACTED]. See ANASTASIJEVIĆDejan:T.64-66(14-Jun-2018).

<sup>1710</sup> [REDACTED]; [REDACTED]; BOGUNOVIĆBorislav:[P02720](#), T.6012-6013; BOGUNOVIĆBorislav:[P02718](#), para.23; [REDACTED].

<sup>1711</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; VASILJEVIĆAleksandar:T.48(5-Feb-2019); VASILJEVIĆAleksandar:T.59(30-Jan-2019).

<sup>1712</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]

<sup>1713</sup> [REDACTED].

<sup>1714</sup> [REDACTED].

(iii) BADŽA, KOJIĆ<sub>(DB)</sub>, and the SMUP established, trained, and controlled the SBWS police, who contributed to implementation of the CCP

402. BADŽA appointed [REDACTED]<sup>1715</sup> and charged him with assisting KOJIĆ<sub>(DB)</sub> to establish police stations<sup>1716</sup> in territories newly cleansed by the Serb Forces.<sup>1717</sup> To carry out this task, STANIŠIĆ and the SMUP leadership deployed SMUP personnel into SAO-SBWS, whom they embedded as police commanders. These SMUP personnel and the SAO-SBWS police they commanded committed crimes and fostered a climate of impunity that encouraged crimes by others, furthering the CCP.

403. In August 1991, STANIŠIĆ and the chief of the SerbianDB for Vojvodina<sup>1718</sup> met HADŽIĆ and BADŽA at the Vojvodina police building in Novi Sad,<sup>1719</sup> where they obtained weapons, vehicles, uniforms, and communication devices to supply the police in Dalj, Borovo Selo, and other SBWS villages.<sup>1720</sup> BADŽA traveled to newly-established police stations and made decisions on their staffing needs.<sup>1721</sup>

404. [REDACTED].<sup>1722</sup> They were then deployed all across SBWS, including to Dalj and Erdut.<sup>1723</sup> [REDACTED] by late September 1991, local police referred to SMUP officers headquartered in Dalj as “Plavi” or “Plavci” for their blue-colored SMUP uniforms.<sup>1724</sup> The SMUP personnel in Dalj trained members of the Vukovar SUP and police in other Eastern Slavonia villages.<sup>1725</sup> [REDACTED].<sup>1726</sup>

405. As Serb Forces forcibly displaced non-Serbs from Western Srem, SMUP personnel organized police stations there.<sup>1727</sup> [REDACTED].<sup>1728</sup> [REDACTED].<sup>1729</sup>

<sup>1715</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1716</sup> [REDACTED]; [REDACTED]; [REDACTED]

<sup>1717</sup> See BOGUNOVIĆBorislav:[P02718](#), para.12-14; [REDACTED]; [REDACTED].

<sup>1718</sup> BOGUNOVIĆBorislav:[P02719](#), para.14.

<sup>1719</sup> BOGUNOVIĆBorislav:[P02718](#), para.13-14; BOGUNOVIĆBorislav:[P02720](#), T.5995-5996.

<sup>1720</sup> BOGUNOVIĆBorislav:[P02719](#), para.14; BOGUNOVIĆBorislav:[P02718](#), para.12-14; BOGUNOVIĆBorislav:[P02720](#), T.5995-5997,6010-6012.

<sup>1721</sup> BOGUNOVIĆBorislav:[P02720](#), T.6014; [REDACTED]; [REDACTED].

<sup>1722</sup> [REDACTED]; [REDACTED]. See [REDACTED].

<sup>1723</sup> [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.11-14(4-Sep-2019); [REDACTED];[REDACTED]. See also [P03377](#), p.3.

<sup>1724</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1725</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>1726</sup> [REDACTED]; [P00588](#); [REDACTED]; [REDACTED].

<sup>1727</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See also [P03380](#).

<sup>1728</sup> [REDACTED].

<sup>1729</sup> [REDACTED]; [REDACTED].

[REDACTED].<sup>1730</sup> [REDACTED].<sup>1731</sup> After Serb Forces took Vukovar, pursuant to BADŽA's orders, two additional units of SMUP officers arrived in the SBWS to establish police stations in towns across the border from Šid, Serbia.<sup>1732</sup>

(iv) SMUP and SAO-SBWS police contributed to implementation of the CCP

406. The substantial presence and involvement of SMUP personnel in SAO-SBWS contributed to—rather than diminished—the crimes directed against non-Serbs, enhancing a climate of impunity. SMUP personnel under BADŽA failed to prevent crime and protect the civilian population, [REDACTED].<sup>1733</sup>

407. [REDACTED].<sup>1734</sup> In September and October 1991, SMUP officers—in coordination with HADŽIĆ—escorted approximately 50 to 80 detainees from Baranja to Borovo and later Dalj, and approximately half were executed after these transfers.<sup>1735</sup> [REDACTED].<sup>1736</sup>

408. [REDACTED].<sup>1737</sup> [REDACTED].<sup>1738</sup> [REDACTED].<sup>1739</sup> [REDACTED].<sup>1740</sup> [REDACTED].<sup>1741</sup> [REDACTED].<sup>1742</sup> [REDACTED].<sup>1743</sup> [REDACTED].<sup>1744</sup> In Baranja, under KOSTIĆ<sub>(DB)</sub>'s watch,<sup>1745</sup> SAO-SBWS police expelled Croats and Hungarians throughout the Indictment period.<sup>1746</sup>

<sup>1730</sup> [REDACTED]; [REDACTED].

<sup>1731</sup> [REDACTED].

<sup>1732</sup> [REDACTED].

<sup>1733</sup> [REDACTED]. [REDACTED]. [REDACTED].

<sup>1734</sup> [REDACTED].

<sup>1735</sup> [REDACTED]; RFJ-151:T.16-17(19-Sep-2017); [REDACTED]; [REDACTED]. *Cross-reference* Section [II.F.2\(c\)\(iv\)](#).

<sup>1736</sup> [REDACTED]; [REDACTED].

<sup>1737</sup> [REDACTED].

<sup>1738</sup> [REDACTED]; [REDACTED].

<sup>1739</sup> [REDACTED]. [REDACTED].

<sup>1740</sup> Indictment, para.36; *cross-reference* Section [III.B.2\(c\)\(i\)a](#).

<sup>1741</sup> [REDACTED]. *See also* [REDACTED]; [REDACTED]

<sup>1742</sup> [REDACTED]

<sup>1743</sup> [REDACTED]

<sup>1744</sup> *Cross-reference* Section [III.B.2\(d\)](#).

<sup>1745</sup> *Cross-reference* Section [II.F.2\(d\)\(iii\)](#); Section [II.F.3\(d\)](#).

<sup>1746</sup> *Cross-reference* Section [III.B.2\(d\)](#).



(f) The Accused and SMUP embedded the SDG and the Unit in all three regions of SBWS to advance the CCP

409. The Accused and co-JCE members from the SMUP directed ARKAN's SDG to Eastern Slavonia, while the Accused also deployed the Unit to establish bases and conduct operations from Tikveš in Baranja, Ležimir in Serbia (across the border from Western Srem), and Pajzoš in Western Srem. Thus, along with BADŽA's forces, units under the SMUP umbrella, managed by STANIŠIĆ from Belgrade, advanced the CCP over the entire territory of SBWS.

(i) Under the SMUP's patronage, ARKAN and the SDG deployed to SAO-SBWS and trained and armed Serb Forces for the CCP

410. During the latter half of 1991, operating under STANIŠIĆ's authority and protection,<sup>1747</sup> ARKAN and his SDG departed their Belgrade headquarters for the SAO-SBWS, where they murdered, persecuted, and forcibly removed non-Serbs.<sup>1748</sup>

411. ARKAN and his men crossed into Croatia in July 1991,<sup>1749</sup> bearing a SMUP permit signed by BOGDANOVIĆ, even though BOGDANOVIĆ was no longer SMUP Minister.<sup>1750</sup> [REDACTED].<sup>1751</sup>

412. Armed with weapons and SMUP logistical support,<sup>1752</sup> the SDG established their first Croatian base in Tenja,<sup>1753</sup> where they participated with other Serb Forces in an attack on 2 August 1991,<sup>1754</sup> before relocating to Erdut shortly thereafter.<sup>1755</sup> ARKAN and his unit established themselves in the former TO Training Centre,<sup>1756</sup> where they were joined by HADŽIĆ,<sup>1757</sup> BADŽA, and the SMUP members brought to support the

<sup>1747</sup> Cross-reference Section [II.D.2\(b\)\(i\)](#)-(ii).

<sup>1748</sup> Cross-reference Section [III.B.2\(a\)](#)-(b),(d).

<sup>1749</sup> [REDACTED]. [REDACTED].

<sup>1750</sup> [REDACTED]; [REDACTED]. See also VASILJEVIĆ Aleksandar: T.15(30-Jan-2019); [REDACTED]; SAVIĆ Borivoje: [P00449](#), para.159.

<sup>1751</sup> [REDACTED].

<sup>1752</sup> [REDACTED]; [P02315](#), p.2.

<sup>1753</sup> [P00486](#), p.1; [REDACTED].

<sup>1754</sup> [P02339](#), p.2; [P01090](#), p.1; [P01089](#), p.2,8; [2D00069](#); [P01117](#); [REDACTED]; [REDACTED].

<sup>1755</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00593](#), p.1; [P01194](#), p.1; [P00490](#), p.1.

<sup>1756</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00852](#), p.13; [REDACTED]; SAVIĆ Borivoje: [P00449](#), para.172.

<sup>1757</sup> [REDACTED]; [REDACTED]; BOGUNOVIĆ Borislav: [P02720](#), T.5988; [REDACTED]; [P01092](#); [REDACTED]; [REDACTED].

SAO-SBWS TO.<sup>1758</sup> By September 1991, the SDG was sharing accommodation with at least 60 SMUP officers who were also billeted at the Erdut Training Centre.<sup>1759</sup> The SDG members received training from the SAJ members who had arrived with BADŽA.<sup>1760</sup>

413. ARKAN's role expanded as he provided support to SMUP and JNA officers. He was authorized to direct local TO members in civilian staffing matters at the Training Centre.<sup>1761</sup> Although ARKAN and the SDG were subordinated to BADŽA as TO commander in operations, ARKAN remained in command of the SDG.<sup>1762</sup> ARKAN carried out BADŽA's instructions<sup>1763</sup> and BADŽA protected and enabled ARKAN,<sup>1764</sup> his close collaborator,<sup>1765</sup> and the two were frequently together.<sup>1766</sup> ARKAN also had contacts with Milan MILANOVIĆ aka MRGUD<sub>(DB)</sub>, who was assisting BADŽA at the time and who provided supplies to the SDG.<sup>1767</sup>

414. ARKAN was formally named the TO Training Centre commander on 21 September 1991.<sup>1768</sup> The SMUP and SerbianMOD funnelled weapons into the region through ARKAN,<sup>1769</sup> who distributed them to the local TOs.<sup>1770</sup> That autumn, the Training Centre was used for distributing weapons and for gathering and training volunteers and local TO members, who were subsequently deployed in local operations.<sup>1771</sup> Some of those trained at the Training Centre remained with ARKAN and his unit, while others were sent to local TO units upon completion of training.<sup>1772</sup> These activities were well-known to BADŽA, who held daily meetings with ARKAN and other

<sup>1758</sup> Cross-reference Section [II.F.2\(e\)\(iii\)](#).

<sup>1759</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1760</sup> [REDACTED]; [REDACTED].

<sup>1761</sup> [P01194](#), p.1.

<sup>1762</sup> [REDACTED]; [REDACTED]; [REDACTED]; KARANMladen:T.52-53(29-Jan-2020); DIMITRIJEVIĆJovan:T.6(12-Feb-2020); [REDACTED]. [REDACTED].

<sup>1763</sup> [REDACTED]; [REDACTED].

<sup>1764</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1765</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]

<sup>1766</sup> [REDACTED]; BOGUNOVIĆNebojša:T.44(3-Sep-2019); BOGUNOVIĆBorislav:[P02720](#), T.5988-5989,6063.

<sup>1767</sup> [REDACTED]; [REDACTED]; NOVAKOVIĆStojan:T.28(6-Oct-2020); [REDACTED]; [REDACTED]; [P01100](#)(00:00:00-00:01:03); [REDACTED].

<sup>1768</sup> [2D00049](#). See also [2D00151](#), p.1; [P03731](#).

<sup>1769</sup> [P00491](#), p.1; RFJ-130:[P00025](#), para.102; DIMITRIJEVIĆJovan:T.10-13(13-Feb-2020).

<sup>1770</sup> [P00491](#), p.1.

<sup>1771</sup> [REDACTED]; [P01194](#), p.2; [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.40(4-Sep-2020); [REDACTED]; [P00762](#), p.2; [P01093](#); [2D00151](#), p.1; [P02047](#), p.1; [REDACTED]; [REDACTED]; [REDACTED]; RFJ-022:T.22,24(1-Nov-2017).

<sup>1772</sup> [P00762](#), p.2.

SMUP officers,<sup>1773</sup> receiving ARKAN's regular reports concerning his activities on the TO Staff's behalf.<sup>1774</sup>

415. In coordination with STANIŠIĆ and the SerbianDB,<sup>1775</sup> ARKAN collaborated with BADŽA on SAO-SBWS TO taskings, including the SDG's role in combat operations.<sup>1776</sup> By virtue of his close relationship with the commander of the Novi Sad Corps, General Andrija BIORČEVIĆ and Boro IVANOVIĆ,<sup>1777</sup> who were involved in the *vojna linija*,<sup>1778</sup> ARKAN was directly engaged by certain JNA officers in joint operations in which he would be subordinated to the 12<sup>th</sup> Corps.<sup>1779</sup>

416. BIORČEVIĆ described the criminal collaboration between the SDG and the JNA in a televised speech, commending SDG units who deployed as infantry units in Eastern Slavonia and proceeded from house to house, eliminating non-Serbs who remained after the JNA's artillery attacks.<sup>1780</sup> ARKAN attended meetings at the command of the 1<sup>st</sup> Military District commanded by General PANIĆ,<sup>1781</sup> who was also linked to the *vojna linija*.<sup>1782</sup>

(ii) The Unit established camps at Ležimir (Serbia), Tikveš, and Pajzoš, from which they deployed to further the CCP

a. Ležimir in Serbia

417. Just weeks after BADŽA arrived in Eastern Slavonia, in September 1991, SIMATOVIĆ and STANIŠIĆ positioned their Unit directly across the border from Western Srem at their Ležimir camp on Mt. Fruška Gora, in Serbia.<sup>1783</sup> From this strategic location, the Accused deployed their Unit across the border into the operations

<sup>1773</sup> [REDACTED]. See also [REDACTED].

<sup>1774</sup> [REDACTED].

<sup>1775</sup> BOGUNOVIĆBorislav:[P02719](#), para.18,22. See [REDACTED].

<sup>1776</sup> [REDACTED].

<sup>1777</sup> [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.118; VASILJEVIĆAleksandar:T.52-54(29-Jan-2019). See also [REDACTED].

<sup>1778</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>1779</sup> [P00486](#), p.4; [REDACTED]; THEUNENSReynaud:T.60(21-Mar-2018); [REDACTED].

<sup>1780</sup> [P00489](#), p.1; [P02426](#), p.2; [REDACTED].

<sup>1781</sup> [P00486](#), p.4; [REDACTED]; [REDACTED]; [REDACTED]; THEUNENSReynaud:[P01980](#), p.250; KARANMladen:T.28(28-Jan-20); [REDACTED].

<sup>1782</sup> VASILJEVIĆAleksandar:T.48(5-Feb-2019); VASILJEVIĆAleksandar:[P02689](#), T.15890-15891.

<sup>1783</sup> Cross-reference Section [II.E.4\(b\)\(ii\)](#).

to drive non-Serbs from Western Srem in September and October 1991.<sup>1784</sup> The Unit operated under IVANOVIĆ<sub>(DB)</sub> aka CRNOGORAC, and BOŽOVIĆ<sub>(DB)</sub>, who [REDACTED] led operations sweeping the terrain around Bapska.<sup>1785</sup>

418. Forces transitioning from the expulsion campaign in SAO-SBWS regrouped at Ležimir, as JCE members prepared to implement the CCP in BiH. After successfully completing ethnic cleansing operations in SAO-SBWS,<sup>1786</sup> the Accused [REDACTED].<sup>1787</sup>

b. Pajzoš in Western Srem

419. In early November, after the Unit joined other Serb Forces in seizing Bapska and nearby Pajzoš in October 1991,<sup>1788</sup> Unit members deployed from their base at Ležimir to establish a forward command post at Pajzoš,<sup>1789</sup> not far from Ilok.<sup>1790</sup> BOŽOVIĆ<sub>(DB)</sub> led the Unit in securing the location by laying mines in the surrounding fields.<sup>1791</sup>

420. Although Unit members committed crimes in Ilok,<sup>1792</sup> BADŽA and [REDACTED] told [REDACTED] they were from another service and to leave the Unit alone, which he did.<sup>1793</sup> BOŽOVIĆ<sub>(DB)</sub>, IVANOVIĆ<sub>(DB)</sub>, and other Unit members informed [REDACTED] that they worked for the SerbianDB.<sup>1794</sup>

<sup>1784</sup> [REDACTED]; [REDACTED]; [P00500](#), p.16; [P00261](#), p.5; [REDACTED]. *Cross-reference* Section [III.B.2\(b\)\(iv\)](#).

<sup>1785</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>1786</sup> *Cross-reference* Section [III.B.2\(b\)\(iii\)](#). DEBELI<sub>(DB)</sub>'s unit coordinated attacks with the JNA and SDG around Vukovar, including Laslovo and Ernestinovo, expelling and killing non-Serb civilians: [1D00107](#); [P03742](#); RFJ-129:T.19(3-Jul-2018). *See* [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1787</sup> [REDACTED]; [REDACTED]; [P02045](#), p.3; [REDACTED]; [P02045](#), p.3; [P02040](#), p.1; [P02047](#); *See e.g.* [REDACTED]. *Cross-reference* Section [II.E.4\(b\)\(ii\)](#).

<sup>1788</sup> *Cross-reference* Section [II.F.2\(h\)\(iii\)](#); Section [III.B.2\(b\)\(iv\)](#).

<sup>1789</sup> VASILJEVIĆAleksandar:T.28-29(31-Jan-2019); [REDACTED]; [P00500](#), p.16; [P00261](#), p.5; [REDACTED]; [REDACTED]. *Cross-reference* Section [II.E.4\(b\)\(ii\)-\(iii\)](#). *See also* BOGUNOVIĆBorislav:[P02718](#), para.24; BOGUNOVIĆBorislav:[P02720](#), T.5998-5999.

<sup>1790</sup> [1D00534](#); [REDACTED]; [REDACTED]; BOGUNOVIĆBorislav:[P02718](#), para.24; BOGUNOVIĆBorislav:[P02720](#), T.6074. The Unit also had a building in Ilok. BOGUNOVIĆBorislav:[P02718](#), para.24; BOGUNOVIĆBorislav:[P02720](#), T.6074; [REDACTED].

<sup>1791</sup> [P00260](#), p.24,29; [P02725](#), p.4. *See also* [REDACTED]; PLAHUTADejan:T.65(19-Nov-2019).

<sup>1792</sup> [REDACTED]; [REDACTED]; [1D00004](#), p.4; [2D00144](#), p.3.

<sup>1793</sup> [REDACTED]. *See also* KRSMANOVIĆDragoslav:T.39(1-Oct-2019).

<sup>1794</sup> [REDACTED]; [REDACTED].

c. Tikveš in Baranja

421. In August 1991, as Serb Forces led by the JNA closed in on Bilje, the last town in Baranja to remain outside Serb control,<sup>1795</sup> Captain DRAGAN<sub>(DB)</sub> arrived with part of the Unit and established a training camp near Tikveš.<sup>1796</sup> In Baranja he joined another SerbianDB-linked unit: [REDACTED].<sup>1797</sup> Unit member MIJOVIĆ<sub>(DB)</sub> commanded the Unit in Baranja.<sup>1798</sup>

422. [REDACTED],<sup>1799</sup> [REDACTED],<sup>1800</sup> [REDACTED],<sup>1801</sup> [REDACTED].<sup>1802</sup>

423. Unit members trained the [REDACTED] unit at Tikveš,<sup>1803</sup> and together they participated in the early September 1991 takeover of Bilje, expelling non-Serbs.<sup>1804</sup>

424. [REDACTED].<sup>1805</sup> [REDACTED].<sup>1806</sup> The bodies of the villagers were later found in the woods not far from Tikveš.<sup>1807</sup>

(g) HADŽIĆ's SNB collaborated with SAO-SBWS police and the SDG to commit crimes against non-Serbs

425. In addition to the other Serb forces proliferating in SBWS, HADŽIĆ established the SNB.<sup>1808</sup> HADŽIĆ's close associate and SBWS and RSK Government minister Stevo BOGIĆ aka Jajo commanded the SNB,<sup>1809</sup> which provided security to HADŽIĆ and the Government.<sup>1810</sup> Styled as police with full police authorisations, equipment, uniforms, and weapons,<sup>1811</sup> SNB members reported to BOGIĆ,<sup>1812</sup> who received his orders from

<sup>1795</sup> Cross-reference Section [II.F.2\(h\)\(ii\)](#).

<sup>1796</sup> [REDACTED]; [P00530](#); [REDACTED]. See also [REDACTED]; [REDACTED].

<sup>1797</sup> Cross-reference Section [II.F.2\(d\)\(iii\)](#).

<sup>1798</sup> VASILJEVIĆAleksandar:T.30-31,43(31-Jan-2019); [REDACTED]; VASILJEVIĆAleksandar:[P02690](#), T.15889-15890; [REDACTED];[REDACTED]. See [P01974](#), p.2.

<sup>1799</sup> [REDACTED].

<sup>1800</sup> [REDACTED]; RFJ-151:T.69-70(20-Sep-2017); [REDACTED].

<sup>1801</sup> [REDACTED]; [REDACTED]. [REDACTED]. [REDACTED].

<sup>1802</sup> [REDACTED]; [REDACTED].

<sup>1803</sup> [REDACTED].

<sup>1804</sup> [REDACTED]; [P00500](#), p.4; [P00258](#), p.12; [P00264](#), p.7; [REDACTED]. See also [P00499](#), p.1.

<sup>1805</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>1806</sup> [REDACTED]; [REDACTED].

<sup>1807</sup> [REDACTED]; [P00534](#); [P00535](#), p.2.

<sup>1808</sup> [REDACTED].

<sup>1809</sup> SAVIĆBorivoje:[P00449](#), para.80; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13230; [REDACTED]; [P03434](#).

<sup>1810</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P03408](#).

<sup>1811</sup> [REDACTED]; [REDACTED]; [P01097](#).

HADŽIĆ.<sup>1813</sup> Stationed at the Erdut Training Centre, the SNB and BOGIĆ were supported by HADŽIĆ<sup>1814</sup> [REDACTED].<sup>1815</sup> Local police, SDG, and SNB members all collaborated and conducted arbitrary arrests, tortured, and killed those they detained and looted the property of their non-Serb victims,<sup>1816</sup> eliminating entire families.<sup>1817</sup>

(h) The combined Serb Forces in SBWS attacked the non-Serb civilian population in SBWS to force their permanent removal

426. Having established the Serb Forces and police structures through which they would implement the CCP in SBWS, the JCE members set the plan in motion with coordinated takeover and expulsion operations in early August 1991. In a display of widespread criminality targeting non-Serbs throughout the region, the combined Serb Forces murdered, persecuted, and forcibly displaced non-Serbs throughout the SBWS.<sup>1818</sup>

(i) Eastern Slavonia

427. In late July 1991, HADŽIĆ met with the head of the Serbian TO, General MANDARIĆ to discuss dividing territory, how many more weapons were needed, and the forthcoming Dalj attack's objective of linking Serb-held territories to enable closer communication with Serbia.<sup>1819</sup> [REDACTED],<sup>1820</sup> mirroring the strategy Serb Forces were using in Krajina at the same time.<sup>1821</sup> [REDACTED].<sup>1822</sup>

428. On 1 August 1991, Serb Forces including the JNA (crossing into Croatia from Serbia)<sup>1823</sup> and SAO-SBWS TO under KOJIĆ<sub>(DB)</sub> attacked Dalj and Erdut, swiftly taking over both towns and causing the Croat population to flee.<sup>1824</sup> In the months that followed,

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<sup>1812</sup> [REDACTED].

<sup>1813</sup> [REDACTED]; BOGUNOVIĆBorislav:[P02720](#), T.6039; [REDACTED]; [REDACTED].

<sup>1814</sup> [REDACTED]; [P01095](#); [REDACTED].

<sup>1815</sup> [REDACTED]; [REDACTED].

<sup>1816</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]

<sup>1817</sup> Cross-reference Section [III.B.2\(c\)\(ii\)](#).

<sup>1818</sup> The crimes referred to below are described in greater detail in Section [III.B.2](#).

<sup>1819</sup> [REDACTED]; VASILJEVIĆAleksandar:T.12(1-Feb-2019); VASILJEVIĆAleksandar:T.13(5-Feb-2019); VASILJEVIĆAleksandar:T.50-51(31-Jan-2019).

<sup>1820</sup> [REDACTED]

<sup>1821</sup> Cross-reference Section [II.F.1\(c\)\(ii\)a](#).

<sup>1822</sup> [REDACTED]

<sup>1823</sup> [REDACTED]

<sup>1824</sup> Cross-reference Section [III.B.2\(b\)\(i\)](#).

Serb Forces committed many crimes against the non-Serb population<sup>1825</sup> as they consolidated their control over Slavonian villages and pushed towards Vukovar.<sup>1826</sup>

429. HADŽIĆ and members of BADŽA's SMUP police detained non-Serb males from villages in Slavonia and Baranja at the Dalj police station.<sup>1827</sup> ARKAN and his men repeatedly removed and executed these prisoners,<sup>1828</sup> including once in HADŽIĆ's presence. ARKAN, members of the SDG, and HADŽIĆ's SNB also murdered non-Serb civilians held at the Erdut Training Centre, as well as other non-Serb civilians from Erdut.<sup>1829</sup> [REDACTED].<sup>1830</sup> [REDACTED].<sup>1831</sup>

430. In mid-September 1991, with the rampant criminality on full display in Dalj, STANIŠIĆ arrived there [REDACTED]. STANIŠIĆ was irate that Vukovar had not fallen yet, considering how well-armed the Serb Forces were.<sup>1832</sup> He ordered a meeting with HADŽIĆ and TO commanders<sup>1833</sup> to plan operations to take Vukovar.<sup>1834</sup>

431. Working jointly with the JNA units commanded by *vojna linija* associates BIORČEVIĆ and Boro IVANOVIĆ,<sup>1835</sup> and SAO-SBWS TO units, including members led by Captain DRAGAN<sub>(DB)</sub>,<sup>1836</sup> ARKAN and his SDG moved towards Vukovar, taking over Tenja, Crepulje, Lužac, Bogdanovci, Borovo Naselje, Laslovo, and Ernestinovo, killing and arbitrarily detaining Croats as they went.<sup>1837</sup> Prior to the Lužac operation, ARKAN informed SDG members that Serbs also lived in the village, and instructed them not to throw grenades into the basements of houses (where Serbs would be located), but rather to target the ground floors, where Croats would be.<sup>1838</sup>

432. As Vukovar fell during 18-20 November 1991, ARKAN personally participated in separating men from the masses of non-Serbs abandoning their destroyed homes.<sup>1839</sup>

<sup>1825</sup> Cross-reference Section [III.B.2\(b\)\(ii\)](#)-(iv).

<sup>1826</sup> [P03758](#).

<sup>1827</sup> Cross-reference Section [III.B.2\(b\)\(ii\)](#); Section [III.B.2\(c\)\(i\)](#).

<sup>1828</sup> Cross-reference Section [III.B.2\(c\)\(i\)](#).

<sup>1829</sup> Cross-reference Section [III.B.2\(c\)\(ii\)](#).

<sup>1830</sup> Cross-reference Section [III.B.2\(c\)\(i\)](#)-(ii).

<sup>1831</sup> Cross-reference Section [III.B.2\(c\)\(i\)a](#).

<sup>1832</sup> [REDACTED]; RFJ-113:T.57-58(26-Sep-2017); [REDACTED].

<sup>1833</sup> [REDACTED]; [REDACTED].

<sup>1834</sup> RFJ-113:T.58(26-Sep-2017); [REDACTED]; [REDACTED].

<sup>1835</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>1836</sup> See e.g. [REDACTED].

<sup>1837</sup> Cross-reference Section [III.B.2\(b\)\(iii\)](#).

<sup>1838</sup> [P03861](#)(00:14:44-00:18:58); [P03861](#), p.3.

<sup>1839</sup> [REDACTED]; [REDACTED].



He also participated in meetings concerning the surrender of Vukovar and the fate of those captured during its fall,<sup>1840</sup> including the men executed at Ovčara.<sup>1841</sup>

433. By the time Serb Forces took Vukovar, thousands of non-Serbs had lost their homes and property and were thereafter deported or forcibly transferred, including by bus to processing centres to Serbia.<sup>1842</sup> Three days later, BIORČEVIĆ acknowledged the collaboration between the SAO-SBWS TO under BADŽA, the JNA, and ARKAN at a celebratory dinner in Erdut, attended by SMUP personnel, at which he awarded weapons to “the most successful leaders” of the TO—ARKAN, BADŽA, and BADŽA’s deputy TRAJKOVIĆ—as recognition for their successful cooperation and direct participation in the final operations around Vukovar.<sup>1843</sup> Years later, SDG members bragged that they perpetrated great crimes in Vukovar, expelling Croats and perpetrating genocide on a large scale.<sup>1844</sup>

(ii) Baranja

434. In Baranja along the northern tier of SBWS—where ethnic Serbs were a minority—from August to December 1991, JCE members pursued a similar pattern of takeovers and persecution.<sup>1845</sup> In August, local Serb TO and police forces seized control of all towns and villages, including Beli Manastir and Darda, where Croats or Hungarians constituted the majority population.<sup>1846</sup> On 28 August 1991, after he and KOJIĆ met with local leaders in Beli Manastir, HADŽIĆ publicly invited Serbs from elsewhere to resettle in Baranja,<sup>1847</sup> emphasising that the empty houses had belonged to “Ustashas” who “will not be coming back”.<sup>1848</sup> By month’s end, Serb Forces controlled approximately 80 percent of Baranja, severing the region from the rest of Croatia.<sup>1849</sup> By that point only the predominantly non-Serb town of Bilje remained outside Serb control.<sup>1850</sup>

<sup>1840</sup> [P02728](#); BOGUNOVIĆBorislav:[P02728](#), T.6083-6084.

<sup>1841</sup> [P02721](#); BOGUNOVIĆBorislav:[P02718](#), para.39-48,51-52; BOGUNOVIĆBorislav:[P02719](#), para.16; BOGUNOVIĆBorislav:[P02720](#), T.6033; [P03316](#), p.5; [P03862](#); [P03863](#); NOVAKOVIĆStojan:T.56-58(8-Oct-2020); [2D00030](#), p.2-4. See AF360.

<sup>1842</sup> Cross-reference Section [III.B.2\(b\)\(iii\)](#).

<sup>1843</sup> [P03098](#); [REDACTED].

<sup>1844</sup> RFJ-129:T.19-24(3-Jul-2018).

<sup>1845</sup> [REDACTED]; RFJ-151:T.27-28(20-Sep-2017). See e.g. BIJAKJakub:[P00595](#), p.39.

<sup>1846</sup> [REDACTED]; BIJAKJakub:[P00595](#), p.81,83.

<sup>1847</sup> [P00022](#).

<sup>1848</sup> [P00022](#).

<sup>1849</sup> RFJ-151:T.6-7(19-Sep-2017).

<sup>1850</sup> BIJAKJakub:[P00595](#), p.82; [REDACTED].

435. In early September 1991, with JNA support, forces under MARTIĆ and KOJIĆ<sub>(DB)</sub>—including Unit members and the [REDACTED] unit they had trained<sup>1851</sup>—took control of Bilje.<sup>1852</sup> [REDACTED],<sup>1853</sup> and MARTIĆ announced its successful capture.<sup>1854</sup> Days later, Serb civilian authorities and the Baranja TO leadership declared the “unconditional capitulation of Croatia” in Baranja, celebrating that “Baranja is free” and that the territory was controlled by the joint forces of the SAO-SBWS TO and police.<sup>1855</sup>

(iii) Western Srem

436. In late summer 1991, Serb Forces in Western Srem along the SBWS’s southern tier, began executing a campaign of intimidating acts of violence and physical destruction aimed at forcing non-Serbs to leave.<sup>1856</sup> Throughout this region the population was overwhelmingly non-Serb,<sup>1857</sup> making clear that Serb domination there would only be achieved through the forced removal of virtually the entire population.

437. Under General ARANĐELOVIĆ, the JNA and other Serb Forces swept across Western Srem, issuing ultimatums, engaging in negotiations designed to be fruitless, and ultimately attacking the towns using heavy artillery, tank units, infantry, and irregular units.<sup>1858</sup> At Bapska, the JNA’s ultimatum was for its inhabitants to capitulate or see the town “cease to exist on the geographical map.”<sup>1859</sup> The JNA attacked nonetheless.<sup>1860</sup> [REDACTED].<sup>1861</sup>

438. Senior JNA officers coordinated with **SIMATOVIĆ**<sup>1862</sup> in operations in this area, and Unit members deployed with the JNA, [REDACTED].<sup>1863</sup> The Unit successfully

<sup>1851</sup> *Cross-reference* Section [II.F.2\(d\)\(iii\)](#).

<sup>1852</sup> [REDACTED]; [P00499](#); [P00258](#), p.12; [P00500](#), p.16; [REDACTED]; [P00264](#), p.7.

<sup>1853</sup> [REDACTED]; [REDACTED].

<sup>1854</sup> [P00499](#); [REDACTED]; [REDACTED].

<sup>1855</sup> THEUNENSReynaud:[P01980](#), p.265-266.

<sup>1856</sup> *Cross-reference* Section [III.B.2\(b\)\(iv\)](#).

<sup>1857</sup> BIJAKJakub:[P00595](#), p.10-11; BIJAKJakub:T.12,20-21(E Slavonia was a mixed area, Croat dominant group at 46%)(3-Oct-2017).

<sup>1858</sup> *Cross-reference* Section [III.B.2\(b\)\(iv\)](#).

<sup>1859</sup> [P00595](#), p.125; [P00488](#); KRALJEVIĆStipan:[P02601](#), p.3; BOGUNOVIĆBorislav:[P02720](#), T.6071-6072; [P00487](#), p.7.

<sup>1860</sup> KRALJEVIĆStipan:T.14(22-Aug-2018); KRALJEVIĆStipan:[P02603](#), T.5327; [P02625](#); KRALJEVIĆStipan:[P02601](#), p.3.

<sup>1861</sup> [REDACTED].

<sup>1862</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>1863</sup> [REDACTED]; [REDACTED]; [P00500](#), p.16; [P00261](#), p.5; [REDACTED]. *See* [REDACTED].

captured the village and the nearby facility at Pajzoš,<sup>1864</sup> After the operation, **SIMATOVIĆ** then installed the Unit's forward command post at Pajzoš.<sup>1865</sup>

439. In the Western Srem campaign, JNA personnel killed residents and destroyed homes, driving over 10,000 people to flee to Ilok.<sup>1866</sup> As of 12 October 1991, the JNA had surrounded Ilok<sup>1867</sup> and days later—fully aware of the fate of nearby towns—the population quit Ilok in a mass exodus, crossing into Serbia to flee in a convoy overseen by Serb forces on 17 October.<sup>1868</sup> “There was no other way out”.<sup>1869</sup>

440. **STANIŠIĆ** and **BADŽA** met with **ARANĐELOVIĆ** during this period for the purpose of coordinating operations of paramilitaries with the JNA through the *vojna linija*.<sup>1870</sup> [REDACTED].<sup>1871</sup>

441. After Ilok was emptied of its non-Serb population, **STANIŠIĆ** met in Bačka Palanka with **HADŽIĆ** and members of his government where the attendees discussed resettling Serbs from Western Slavonia in the homes Croats had vacated in Ilok,<sup>1872</sup> a key strategy that JCE members would use to prevent non-Serbs' return for years to come.<sup>1873</sup>

442. Having successfully completed their SBWS campaign, **STANIŠIĆ** continued to coordinate with SBWS military and police personnel in SBWS, demonstrating detailed knowledge about the situation and participating in ongoing discussions about local TO appointments. In December 1991, **STANIŠIĆ** shared detailed information about Serbian paramilitary formations operating in Croatia in a joint meeting with the JNA security organ.<sup>1874</sup> **STANIŠIĆ** and **BADŽA** later met in Eastern Slavonia with **HADŽIĆ** and Generals **PANIĆ** and **MANDARIĆ**, deciding to appoint SMUP officials **TRAJKOVIĆ** and **ĆURČIĆ** as TO Commander and Deputy Commander, respectively.<sup>1875</sup> As SAO-

<sup>1864</sup> [REDACTED]; [REDACTED]; [P00500](#), p.16; [P00261](#), p.5; [REDACTED]. See [REDACTED].

<sup>1865</sup> Cross-reference Section [II.E.4\(b\)\(iii\)](#).

<sup>1866</sup> Cross-reference Section [III.B.2\(b\)\(iv\)](#).

<sup>1867</sup> [P02628](#), p.2.

<sup>1868</sup> **KRALJEVIĆ**Stipan:[P02601](#), p.6; [P03289](#); [P01101](#).

<sup>1869</sup> **KRALJEVIĆ**Stipan:T.33(22-Aug-2018); **KRALJEVIĆ**Stipan:[P02601](#), p.5-6;

**KRALJEVIĆ**Stipan:[P02603](#), T.5354; [2D00099](#); [P01153](#); [REDACTED].

<sup>1870</sup> **VASILJEVIĆ**Aleksandar:T.17,48-49(5-Feb-2019); [REDACTED].

<sup>1871</sup> [REDACTED].

<sup>1872</sup> **BOGUNOVIĆ**Borislav:[P02719](#), para.11-13.

<sup>1873</sup> Cross-reference Section [II.E.4\(d\)](#).

<sup>1874</sup> **VASILJEVIĆ**Aleksandar:T.16(31-Jan-2019).

<sup>1875</sup> **VASILJEVIĆ**Aleksandar:T.38-39,50-51(30-Jan-2019)(in light of other evidence, **VASILJEVIĆ** appears to be mistaken about the meeting's timing); **VASILJEVIĆ**Aleksandar:T.7(6-Feb-2019);

SBWS Minister of Defence and the Accused's proxy, KOJIĆ<sub>(DB)</sub> made TRAJKOVIĆ's appointment official on 21 December 1991 in a decision that MRGUD<sub>(DB)</sub> signed on his behalf.<sup>1876</sup> KOJIĆ<sub>(DB)</sub> appointed MRGUD<sub>(DB)</sub> as his Assistant Minister of Defence on 19 December.<sup>1877</sup>

### **3. JCE members continued to implement the JCE in the RSK**

443. On 19 December 1991, SAO-Krajina proclaimed itself the RSK.<sup>1878</sup> It was joined by SAO-Western Slavonia and SAO-SBWS on 26 February 1992,<sup>1879</sup> by which time Serbs had violently expelled vast numbers of non-Serbs from SAO-Krajina and SAO-SBWS. JCE members BABIĆ and KRAJIŠNIK celebrated the RSK's proclamation as a significant step towards their goal of consolidating Serb territories into a Serb state.<sup>1880</sup> JCE members consolidated Serb political, police, and security structures as RSK structures and forces, which collectively continued the removal of non-Serbs. MILOŠEVIĆ, the Accused, and other Belgrade JCE members wielded significant power in developing these structures, which remained dependent on them for support of every kind. Despite the agreement of MILOŠEVIĆ and Croatian Serbs to the Vance Plan, Serb Forces including ARKAN's SDG, MARTIĆ's RSK police, and the Unit continued to violently expel non-Serbs prior to UNPROFOR's arrival, and continued to prevent their return until Croatia re-gained RSK territory in the latter part of 1995.

(a) STANIŠIĆ, MILOŠEVIĆ, and other JCE members nominally accepted the Vance Plan but exploited it to further advance the CCP

444. Under pressure from MILOŠEVIĆ, STANIŠIĆ, KARADŽIĆ, and others, the RSK Assembly accepted the Vance Plan on 16 February 1992,<sup>1881</sup> which required *inter alia* the JNA's withdrawal and demilitarisation; the return of displaced persons; and the deployment of UN forces.<sup>1882</sup> MILOŠEVIĆ imposed the Vance Plan on RSK, not

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VASILJEVIĆAlexandar:[P02695](#), T.15867. *See also* [REDACTED]; [REDACTED]. Both TRAJKOVIĆ and ĆURČIĆ were awarded by the SerbianDB in 1996 for their activities during the conflict: [P00849](#), p.8.

<sup>1876</sup> [P00584](#); RFJ-113:T.30-31(26-Sep-2017); [REDACTED].

<sup>1877</sup> [P00583](#); RFJ-113:T.29-30(26-Sep-2017).

<sup>1878</sup> [REDACTED]; BABIĆMilan:[P01243](#), para.5; BABIĆMilan:[P01560](#), para.21; THEUNERSReynaud:[P01980](#), p.301; [REDACTED]; RJS-07:T.28(28-Aug-2019); [P01578](#). *See* [P03770](#); AF361.

<sup>1879</sup> BABIĆMilan:[P01560](#), para.23; BABIĆMilan:[P01246](#), T.13211-13212; [P01275](#); [P01281](#); THEUNEUNReynaud:[P01980](#), p.302.

<sup>1880</sup> [P01578](#); BABIĆMilan:[P01244](#), p.3; [REDACTED]. *See* AF77; AF80.

<sup>1881</sup> BABIĆMilan:[P01246](#), T.13134-13137,13214-13216,13633-13634,13728; [REDACTED].

<sup>1882</sup> [P01318](#), p.5-7.

because it would ensure peace in the territory, but rather for strategic reasons, as it was an opportunity to formalise Serb control over the territory in Croatia that Serb Forces had seized during ethnic cleansing operations in 1991.<sup>1883</sup>

445. Belgrade JCE members exercised decisive authority over RSK leadership to prevent dissent from any RSK Serbs who dared resist the Vance Plan, including BABIĆ.<sup>1884</sup> STANIŠIĆ summoned BABIĆ to the Presidency building in Belgrade in early January, where he and KERTES pressed BABIĆ to agree to the plan.<sup>1885</sup> On 9 January 1992, MILOŠEVIĆ published a letter to BABIĆ stating that Serbia had lost its trust in him and that future support from Serbia was thus jeopardised—a thinly-veiled threat foretelling BABIĆ’s removal.<sup>1886</sup> Under MILOŠEVIĆ’s orders, BABIĆ was threatened and prevented from leaving a lengthy SFRY Presidency meeting on this subject lasting from 31 January to 2 February 1992; but he still refused to sign, eventually fleeing on the third day.<sup>1887</sup>

446. In February 1992, MILOŠEVIĆ engineered the removal of BABIĆ via a secret session of the RSK Assembly.<sup>1888</sup> After demonstrating his willingness to follow MILOŠEVIĆ by supporting the Vance Plan,<sup>1889</sup> HADŽIĆ became RSK President on 26 February.<sup>1890</sup> BABIĆ’s replacement exemplified MILOŠEVIĆ’s total domination of RSK decision-making; as BOSNIĆ testified:

Quite simply, Milošević with the assistance of those who supported the Vance Plan and excluded us from all political life turned us into presidents of municipalities who had no say in these negotiations or in any real decision-making. [...] Babić was removed and replaced by Hadžić, who was more closely aligned with Milošević.<sup>1891</sup>

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<sup>1883</sup> [P02931](#); [REDACTED].

<sup>1884</sup> See BOSNIĆMilan:T.99(22-Aug-2019).

<sup>1885</sup> BABIĆMilan:[P01246](#), T.13134-13137,13221-13222; [REDACTED]; [REDACTED]; [P01296](#); [REDACTED]. See AF361; [P03388](#), p.5,12,14,21.

<sup>1886</sup> [ID00003](#); [P01294](#); BOSNIĆMilan:T.40-42(21-Aug-2019).

<sup>1887</sup> BABIĆMilan:[P01246](#), T.13221-13222; [REDACTED].

<sup>1888</sup> BOSNIĆMilan:T.42(21-Aug-2019); BABIĆMilan:[P01246](#), T.13220-13223,13606-13607,13610,13618-13622,13633; [REDACTED]; WILSONJohn:T.15(27-Jun-2017); WILSONJohn:T.34-36,44-45(28-Jun-2017); [REDACTED].

<sup>1889</sup> [P00071](#), para.21; [REDACTED]; BABIĆMilan:[P01246](#), T.13227-13230; [REDACTED]. See [P00362](#); [REDACTED].

<sup>1890</sup> BABIĆMilan:[P01246](#), T.13226-13227; THEUNENSReynaud:[P01980](#), p.304.

<sup>1891</sup> BOSNIĆMilan:T.48(20-Aug-2019); BOSNIĆMilan:T.42,49-50(21-Aug-2019); BOSNIĆMilan:T.11,96(22-Aug-2019). See [P02787](#), p.2-3.

(b) STANIŠIĆ and MILOŠEVIĆ advised HADŽIĆ and RSK leaders organising Serb structures in the newly consolidated RSK that were used to further the CCP

447. With the impending removal of BABIĆ, the RSK's establishment proceeded in earnest in 1992, under the direction of Belgrade JCE members. On 7 January 1992, STANIŠIĆ and KARADŽIĆ discussed STANIŠIĆ's role in what they referred to as RSK's "consolidation" phase. STANIŠIĆ had just met with 44 commanders on the ground and reported: "I am trying to reorganise as much as I can. I am talking with these people, because they have some trust in me...I have certain reputation there." STANIŠIĆ affirmed that he would appoint people there after touring the field and creating "some kind of concept".<sup>1892</sup>

448. In the months that followed, HADŽIĆ—as MILOŠEVIĆ's "lieutenant" in RSK<sup>1893</sup>—and RSK Assembly members met regularly, enacted legislation, dealt with the status of the negotiations with Croats and internationals, mobilized, deployed forces, and met regularly with military and civilian negotiators and force commanders, becoming—in essence—a state, and normalizing their ongoing persecution of non-Serbs.<sup>1894</sup> In Belgrade, RSK leaders attended an SFRY Presidency session with Serb leadership from BiH and Serbia on 2 March 1992 and discussed their respective visions for re-aligning the ethnic composition of Croatian territory through population transfer.<sup>1895</sup>

449. When MARTIĆ—who supported the Vance Plan following pressure from MILOŠEVIĆ<sup>1896</sup>—became RSK Minister of Interior on 26 February 1992,<sup>1897</sup> he and the RSK-MUP continued to operate under STANIŠIĆ's influence and authority.<sup>1898</sup> KOSTIĆ<sub>(DB)</sub>, KOJIĆ<sub>(DB)</sub>, ORLOVIĆ<sub>(DB)</sub>, and Tošo PAJIĆ<sub>(DB)</sub> became MARTIĆ's Assistant MUP Ministers—all operating under the SerbianDB.<sup>1899</sup> [REDACTED].<sup>1900</sup>

<sup>1892</sup> [P02787](#), p.5-6.

<sup>1893</sup> [REDACTED].

<sup>1894</sup> See [P00322](#); [P03101](#); [P01275](#); [P03434](#); BABIĆMilan:[P01560](#), para.23; [REDACTED]; [1D01308](#), p.3; [P01536](#), p.2; [P01275](#); [P00327](#), p.1; [REDACTED]; THEUNENSReynaud:[P01980](#), p.304-306; [P01361](#); [P00159](#); [P00515](#); [P03437](#). See AF400. Cross-reference Section [III.B.2\(d\)](#).

<sup>1895</sup> [P00155](#), p.66-68.

<sup>1896</sup> BOSNIĆMilc:T.45(20-Aug-2019); BOSNIĆMilc:T.43(21-Aug-2019).

<sup>1897</sup> [P01551](#); [P03434](#); BABIĆMilan:[P01248](#), T.1451-1452; THEUNENSReynaud:[P01980](#), p.304. See AF363. See also [P03433](#).

<sup>1898</sup> VASILJEVIĆAleksandar:[P02695](#), T.15867; [REDACTED]. Cross-reference Section [II.E.2\(a\)](#).

<sup>1899</sup> RFJ-113:T.50-51(27-Sep-2017); [REDACTED]; [REDACTED]; [REDACTED]; ĐUKIĆPetar:T.10(21-Jan-2020); [REDACTED]; DRAČAAco:T.61(27-Nov-2019); DRAČAAco:T.14(3-Dec-2019); [REDACTED]; BOSNIĆMilc:T.57(21-Aug-2019); [P03421](#), p.4; [1D00039](#); [P00159](#), p.2; [P03439](#), p.4; [1D00503](#), p.2; NIELSENChristian:[P00850](#), para.414.



**STANIŠIĆ** was the RSK-MUP's point of contact for the SMUP,<sup>1901</sup> which embedded officers in RSK police stations,<sup>1902</sup> and played a critical role in reorganising the RSK-MUP, with FSUP assistance.<sup>1903</sup> Both the FSUP and RSK-MUP reported to the SerbianDB.<sup>1904</sup>

450. As Assistant Ministers, **KOSTIĆ**<sub>(DB)</sub> and **KOJIĆ**<sub>(DB)</sub> had similar responsibilities and exercised immense influence, conferring on **STANIŠIĆ** far-reaching authority in the RSK. **KOSTIĆ**<sub>(DB)</sub> was primarily based in Baranja while his zone of responsibility covered the entire RSK territory, whereas **KOJIĆ**<sub>(DB)</sub> was headquartered in Eastern Slavonia and his zone of responsibility was primarily the SBWS region.<sup>1905</sup> Both presented as acting RSK Minister of Interior in **MARTIĆ**'s absence and represented the RSK in discussions with the international community.<sup>1906</sup> The RSK Police Chief Inspector—in charge of all public security tasks—**Petar ĐUKIĆ**,<sup>1907</sup> whose superior was **KOJIĆ**<sub>(DB)</sub>,<sup>1908</sup> testified that “**KOJIĆ** was nominally, legally, and judging by his actual authority the main man in charge of Slavonia and Baranja, even not just in terms of police. He was the individual with greatest authority in that area.”<sup>1909</sup>

451. [REDACTED] **POKRAJAC**<sub>(DB)</sub> to be **MARTIĆ**'s special advisor [REDACTED],<sup>1910</sup> which continued to report to the SerbianDB.<sup>1911</sup> [REDACTED] **POKRAJAC**<sub>(DB)</sub>,<sup>1912</sup> whose responsibilities included the RSK special purpose units.<sup>1913</sup>

452. With the RSK-MUP operating under **STANIŠIĆ**'s and the SerbianDB's control, RSK police fostered a climate of impunity for crimes against non-Serbs and participated

<sup>1900</sup> [REDACTED].

<sup>1901</sup> See [P00207](#), p.2; [REDACTED].

<sup>1902</sup> See [P03357](#), p.1; [P03377](#), p.3; [P03380](#), p.3.

<sup>1903</sup> [P03397](#); [P03389](#); [P03084](#); [P03390](#); [REDACTED]; [P02966](#), p.10-12; [REDACTED]; [2D00128](#); THEUNENSReynaud:T.39-41(20-Mar-2018).

<sup>1904</sup> [P03393](#); [REDACTED]; [P03404](#); [P03405](#); [P03411](#); [REDACTED]; [REDACTED].

<sup>1905</sup> RFJ-113:T.41(26-Sep-2017); RFJ-113:T.51(27-Sep-2017); ĐUKIĆPetar:T.12-13(21-Jan-2020); [REDACTED].

<sup>1906</sup> ĐUKIĆPetar:T.10,12-13(21-Jan-2020); [REDACTED]; [P03821](#), p.1; [P03822](#), p.1.

<sup>1907</sup> ĐUKIĆPetar:T.38(16-Dec-2019); ĐUKIĆPetar:T.6(21-Jan-2020).

<sup>1908</sup> ĐUKIĆPetar:T.9(21-Jan-2020).

<sup>1909</sup> ĐUKIĆPetar:T.10(21-Jan-2020).

<sup>1910</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00337](#); NIELSENChristian:T.62(14-Nov-2017); [P00850](#), para.477.

<sup>1911</sup> E.g. DRAČAAco:T.36,40-41(3-Dec-2019); [P03818](#). See also [REDACTED]; SLIŠKOVIĆDejan:[P02597](#), p.1(confirming that Milan RADONJIĆ<sub>(DB)</sub>'s nickname was “Medo”/“Meda”); [P00553](#), p.18(confirming that Milan RADONJIĆ<sub>(DB)</sub>'s nickname was “Medo”/“Meda”).

<sup>1912</sup> [REDACTED].

<sup>1913</sup> [P00338](#).



in such crimes themselves, and MARTIĆ implemented a policy of not permitting Croats to return,<sup>1914</sup> as discussed below.

(c) Belgrade and RSK JCE members worked closely to restructure Serb forces to circumvent the Vance Plan's demilitarisation requirement

453. Serb leaders never intended to abide by the Vance Plan.<sup>1915</sup> Leading up to its implementation, the Belgrade and RSK leadership made concrete plans to thwart provisions disallowing a Serb army in RSK.<sup>1916</sup> In January 1992, the RSK Constitution was proclaimed, declaring the RSK TO the “armed forces” of the RSK, commanded by the RSK President<sup>1917</sup>—in direct violation of the Vance Plan's order to demilitarise.<sup>1918</sup>

454. The next month, prominent SMUP members, JCE members, and others in the Serb leadership met to organise RSK forces. Around 20 February 1992, SerbianDB and SerbianJB members, including STANIŠIĆ, SIMATOVIĆ, and BADŽA, met at the JNA General Staff in Belgrade with top military commanders and MARTIĆ to discuss assisting the RSK in establishing its TO and police, in light of the Vance Plan.<sup>1919</sup> MARTIĆ requested SMUP Minister SOKOLOVIĆ's assistance to divert SDK funds from the RSK TO to the RSK-MUP.<sup>1920</sup> In April 1992, STANIŠIĆ met again with MARTIĆ and military officials at the JNA General Staff to discuss organising the defence structures remaining in Krajina territory, preparing to subvert the Vance Plan in advance of UNPROFOR's arrival there.<sup>1921</sup>

455. The Vance Plan required the demobilisation and disbanding of local TO units and withdrawal of the JNA; troops had to remove anything with Yugoslavian symbols and hand over equipment to the withdrawing JNA forces, allowing only for a lightly armed local police force.<sup>1922</sup> Instead, as planned, the JNA withdrew from RSK, but left behind its weapons,<sup>1923</sup> and high-ranking officers.<sup>1924</sup> On 26 February 1992, MLADIĆ ordered

<sup>1914</sup> BABIĆMilan:[P01246](#), T.13232; [P00131](#), p.3.

<sup>1915</sup> [P03392](#); [P00155](#); [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13468-13469. See [P00094](#).

<sup>1916</sup> [P03388](#), p.9-12,18,21-24,28-29; [P03392](#); [P00155](#); [REDACTED].

<sup>1917</sup> [P01321](#); THEUNENSReynaud:[P01980](#), p.304-305.

<sup>1918</sup> [P01318](#), p.6-7. See AF384.

<sup>1919</sup> VASILJEVIĆAleksandar:T.5-6(5-Feb-2019); VASILJEVIĆAleksandar:T.10-11(31-Jan-2019).

<sup>1920</sup> [P00065](#). See [2D00128](#); THEUNENSReynaud:T.39-41(20-Mar-2018).

<sup>1921</sup> VASILJEVIĆAleksandar:[P02695](#), T.15867; [REDACTED].

<sup>1922</sup> [P01318](#), p.6-7; THEUNENSReynaud:[P01980](#), p.303; [REDACTED]; [REDACTED].

<sup>1923</sup> BABIĆMilan:[P01246](#), T.13231-13234,13591,13595,13887,13896,14019-14020; BABIĆMilan:[P01560](#), para.24; [REDACTED]; [REDACTED]; [P03388](#), p.9-12,18,21-24,28-29; [P03370](#); [P03371](#); [P01363](#), p.1,3; [P03412](#); [P01434](#); [P01405](#).

the JNA's 2<sup>nd</sup> Military District to continue to assist the TO Staff and the RSK-MUP "in carrying out organisational and establishment changes, and in equipping Territorial Defence and MUP units".<sup>1925</sup> With SMUP and FSUP assistance,<sup>1926</sup> JNA units transformed into the RSK police and special purpose militia units.<sup>1927</sup> Post-Vance Plan, RSK-MUP police force ballooned to some 23,000, comprising approximately 7,000 policemen and 16,000 additional "special purpose militia" under the guise of "police".<sup>1928</sup> Armed forces with no true police function were nominally recast as RSK-MUP units,<sup>1929</sup> including the existing local TO units,<sup>1930</sup> as well as forces from Serbia who remained in RSK,<sup>1931</sup> such as the Unit,<sup>1932</sup> SMUP police units,<sup>1933</sup> and ARKAN's SDG<sup>1934</sup> — [REDACTED].<sup>1935</sup> The RSK-MUP issued false civilian IDs to TO members,<sup>1936</sup> and RSK-MUP IDs to the Unit.<sup>1937</sup> Weapons were hidden in villages and hills and kept away from the UN, including mortars, artillery, infantry weapons, rockets and rocket launchers, and other equipment.<sup>1938</sup> Two months later, MLADIĆ explicitly ordered the violation of the Vance Plan, directing arms to the newly formed RSK-MUP, noting that military personnel have been "redeployed" to the RSK-MUP, and that troops will change into police uniforms.<sup>1939</sup>

456. On 23 March 1992, HADŽIĆ signed the RSK Law on Defence, making clear his plan to militarise the RSK and violate the Vance Plan.<sup>1940</sup> The structure of the TO was

<sup>1924</sup> [REDACTED]; THEUNENSReynaud:[P01980](#), p.310-311; [P03388](#), p.29.

<sup>1925</sup> [P03336](#), p.4.

<sup>1926</sup> [2D00128](#); [P02966](#), p.17; [P03389](#).

<sup>1927</sup> [P03346](#); [P01287](#); [P03371](#); [2D00127](#); THEUNENSReynaud:T.36-37(20-Mar-2018); THEUNENSReynaud:[P01980](#), p.300; [P03412](#); [P01979](#); [REDACTED]; [P00103](#), para.7; [REDACTED].

<sup>1928</sup> [REDACTED]; [P00126](#), p.1; [P00131](#), p.3; BABIĆMilan:[P01246](#), T.12979-12982.

<sup>1929</sup> See [REDACTED]; [P00104](#); [P00164](#), p.3,5-6; [P03412](#).

<sup>1930</sup> THEUNENSReynaud:[P01980](#), p.308-310; [P00161](#); WILSONJohn:T.48-49(27-Jun-2017).

<sup>1931</sup> [REDACTED].

<sup>1932</sup> [REDACTED]; [REDACTED]; [P00129](#), p.3; [P00105](#), p.4. *E.g. compare* [1D00004](#), p.4 with [P00259](#), p.14; *compare* [2D00123](#), p.3(p.3(BCS)) with [P02725](#), p.4(p.14(BCS)) and [1D00067](#), p.7,10. *Cross-reference* Section [II.D.2\(a\)\(ii\)a.](#).

<sup>1933</sup> [P03382](#); [P03380](#), p.3. See [REDACTED]; [REDACTED].

<sup>1934</sup> [REDACTED]; [REDACTED]; NOVAKOVIĆStojan:T.48-49(6-Oct-2020); [2D00152](#)(01:33:38-01:34:28), p.14; DIMITRIJEVIĆJovan:T.5(12-Feb-2020); DIMITRIJEVIĆJovan:T.36-37(14-Feb-2020); [REDACTED]; [REDACTED]; THEUNENSReynaud:[P01980](#), p.301,314-331.

<sup>1935</sup> [REDACTED]; [REDACTED].

<sup>1936</sup> [P03442](#).

<sup>1937</sup> *Cross-reference* Section [II.D.2\(a\)\(ii\)a.](#)

<sup>1938</sup> RFJ-066:T.30-31(12-Jul-2017); [REDACTED]; [REDACTED]; [P03388](#), p.11,18,29; [P00103](#), p.2; [P00108](#), p.1. See AF120.

<sup>1939</sup> [P03370](#). See [P00126](#); [REDACTED].

<sup>1940</sup> [P03435](#); [P01363](#), p.1,3; THEUNENSReynaud:[P01980](#), p.305. See [P01363](#), p.1,3; [P03412](#).

maintained, forming the basis for the future RSK army.<sup>1941</sup> On 8 November 1992, UNPROFOR reported that RSK authorities had only implemented those parts of the Vance Plan that suited them and blocked progress on further implementation to gain time as they pursued other political and military objectives.<sup>1942</sup> Indeed, on 27 November 1992, abandoning the pretense of compliance with demilitarisation, RSK leadership established the SVK, officially transforming RSK TO and special police units into an army in violation of the Vance Plan.<sup>1943</sup> Throughout, MILOŠEVIĆ—feigning a lack of authority over the RSK<sup>1944</sup>—supported, funded, and cooperated with the RSK police and armed forces, directly appointing commanders and providing logistical, financial, and political support to RSK authorities, including MARTIĆ, until at least August 1995.<sup>1945</sup>

(d) Serb Forces continued to violently expel non-Serbs from RSK and block the safe return of displaced non-Serbs

457. Throughout 1992 and onward, JCE members expelled large numbers of the remaining non-Serb population and prevented already-expelled Croats from returning. As ARKAN announced in Golubić on 1 March 1992, Serbs had to defend themselves “[a]gainst the Ustashas [...] not only in the Krajina but throughout our blood trenched [*sic*] Serbian land. [...] [Krajina] never belonged to Croatia. This is Serbia and will stay a part of Serbia”.<sup>1946</sup>

458. Serb Forces, including the RSK-MUP, Unit, and SDG, violently expelled non-Serbs *en masse* before UNPROFOR fully deployed in the RSK in spring/summer 1992,<sup>1947</sup> which STANIŠIĆ would have been informed about.<sup>1948</sup> These Serb Forces and civilian authorities continued to compel the non-Serb population to flee through acts that

<sup>1941</sup> BABIĆMilan:[P01246](#), T.13231-13234,13595,13887; BABIĆMilan:[P01560](#), para.24; [P03388](#), p.9-12,18,21-24,28-29.

<sup>1942</sup> [P00132](#); [REDACTED]. See [P00104](#); [REDACTED].

<sup>1943</sup> [P03445](#); [P01434](#); [P00357](#); THEUNENSReynaud:[P01980](#), p.300-301.

<sup>1944</sup> [P03749](#).

<sup>1945</sup> BABIĆMilan:[P01246](#), T.12970-12971,12979-12982,13189,13379,13232-13234,13605-13606; [P00163](#); WILSONJohn:T.53-54(27-Jun-2017).

<sup>1946</sup> [P00061](#)(00:00:32-00:04:36), p.1; [P00327](#).

<sup>1947</sup> [P00103](#), p.1,4-5; WILSONJohn:T.12-13(4-Jul-2017); [REDACTED]. See BIJAKJakub:[P00595](#), p.85-87(Benkovac Municipality),95-97(Knin Municipality),104-110(Osijek Municipality),125-137(Vukovar Municipality).

<sup>1948</sup> See [REDACTED]; [REDACTED]; [REDACTED]; KRSMANOVIĆDragoslav:T.6-7(1-Oct-2019); [REDACTED]; [REDACTED].

made life in the region untenable, including rapes, murders, expulsions, coercion, torture, property destruction, and dismissal from employment.<sup>1949</sup>

459. At the 2 March 1992 SFRY Presidency session, RSK Prime Minister ZEČEVIĆ—linked to the Accused through what BABIĆ called the “parallel structure”<sup>1950</sup>—articulated the RSK’s (and MARTIĆ’s<sup>1951</sup>) policy: that Croat refugees could not be allowed to return because Serbs and Croats could not live together. ZEČEVIĆ reported Serbs burning Croat property “in order to prevent them from coming back to their homes”.<sup>1952</sup> Explaining his picture of life for non-Serbs in the RSK, ZEČEVIĆ described schools teaching in Cyrillic which the Croats would hate so much, they would “simply have to leave”.<sup>1953</sup> Contributing to this policy, the Accused’s assets KOJIĆ<sub>(DB)</sub> and Tošo PAJIĆ<sub>(DB)</sub> sat on a commission created the next month for distributing the property abandoned by fleeing non-Serbs.<sup>1954</sup>

460. After UNPROFOR’s arrival, Serb authorities in the RSK, emboldened by Serbia’s obstruction of the Vance Plan and non-cooperation with UNPROFOR, continued to terrorise the non-Serb population.<sup>1955</sup> They resisted efforts by non-Serbs to return to their homes in the RSK by refusing to disarm the Serb population, insisting that returns could not take place, and threatening military action if returns were attempted.<sup>1956</sup>

461. The coordinated influx of tens of thousands of Serbs from outside the territory and their organised occupation of houses previously belonging to non-Serbs—facilitated by local Serb authorities—completed the process of what was often referred to as the “Serbianization” of the region, ensuring that Croat refugees could never return to their homes.<sup>1957</sup> Unit members based at Pajzoš and others moved into non-Serb homes in Ilok,

<sup>1949</sup> *Cross-reference* Section [III.B.1\(d\)](#). See [P00131](#), p.3; [REDACTED]; WILSONJohn:T.9-10,27(27-Jun-2017).

<sup>1950</sup> BABIĆMilan:[P01246](#), T.13401. *Cross-reference* Section [II.E.1\(b\)](#).

<sup>1951</sup> BABIĆMilan:[P01246](#), T.13232.

<sup>1952</sup> [P00155](#), p.58.

<sup>1953</sup> [P00155](#), p.58; WILSONJohn:T.19-20(27-Jun-2017). See DRAČAAco:T.38-40(28-Nov-2019).

<sup>1954</sup> [P00515](#); [REDACTED].

<sup>1955</sup> [REDACTED]; [REDACTED]; [P00128](#), p.7-9; [REDACTED]; [P00105](#), p.6; [P00106](#), p.2; [P00107](#), p.4-5,11; [P00108](#); [P00487](#); [P00124](#), p.25-26. See AF399; AF401-AF402.

<sup>1956</sup> BABIĆMilan:[P01246](#), T.13232; [P00108](#); [P00107](#), p.3-4,6-7,11-12; [P00109](#), p.1-2.

<sup>1957</sup> [P00125](#), p.15; [P00165](#), p.2-3; [P00105](#), p.6; [P00547](#), p.2; [P00103](#), p.5; WILSONJohn:T.59-60(27-Jun-2017); [REDACTED]; [REDACTED]; [REDACTED]. *Cross-reference* Section [II.F.2\(h\)\(ii\)](#). See BOGUNOVIĆBorislav:[P02719](#), para.12-13; BOGUNOVIĆBorislav:[P02720](#), T.5997,6044; [P00103](#), p.5; [P00124](#), p.26.

with police support.<sup>1958</sup> UNPROFOR officials reported the direct link between the ongoing expulsion of the non-Serb population and the organized resettlement of Serbs in Baranja.<sup>1959</sup> It was not even permitted for Serbs and Croats to reach individual agreements related to their houses.<sup>1960</sup> The ethnic cleansing of non-Serbs from the RSK continued to such an extent that UN representatives concluded it was perpetrated pursuant to an official policy.<sup>1961</sup>

462. Despite UNPROFOR representatives repeatedly raising these issues with MILOŠEVIĆ, HADŽIĆ, other high-level leaders, and SerbianDB assets like Tošo PAJIĆ<sub>(DB)</sub> and MOMČILOVIĆ<sub>(DB)</sub>,<sup>1962</sup> crimes and expulsions against non-Serbs continued with impunity as part of a centrally controlled plan to advance the CCP while circumventing the Vance Plan.<sup>1963</sup> Although non-Serbs were ostensibly entitled to full police protection, in practice they were not protected, and RSK police were instead complicit in their persecution.<sup>1964</sup> As UNPROFOR representative WILSON reported in November 1992: “ethnic cleansing continues and is for the most part conducted by police forces”.<sup>1965</sup> As Assistant MUP Ministers, KOJIĆ<sub>(DB)</sub> and KOSTIĆ<sub>(DB)</sub> were informed of crimes<sup>1966</sup> but ensured that Eastern Slavonia and Baranja police, respectively,<sup>1967</sup> did not protect non-Serbs.<sup>1968</sup> KOSTIĆ<sub>(DB)</sub> was himself involved in smuggling weapons and looting Croat property.<sup>1969</sup> RSK police tacitly approved of these and other incidents of crimes against non-Serbs by failing to prevent, investigate, or punish incidents reported by Croats.<sup>1970</sup>

<sup>1958</sup> KRSMANOVIĆDragoslav:T.17(24-Sep-2019); KRSMANOVIĆDragoslav:T.7-8(1-Oct-2019); [P00164](#), p.4-5. See [REDACTED].

<sup>1959</sup> [P00125](#), p.15; WILSONJohn:T.60(27-Jun-2017).

<sup>1960</sup> [REDACTED]; [REDACTED]; [REDACTED]. See [P00516](#).

<sup>1961</sup> [REDACTED]; WILSONJohn:T.12-13,52-53,69-70(27-Jun-2017); [P00131](#); [P00132](#).

<sup>1962</sup> [REDACTED]; [P00151](#); [REDACTED]; [P00159](#); [P00118](#) (“Glina milicija” (i.e. police) must refer to Glina police chief MOMČILOVIĆ<sub>(DB)</sub>); WILSONJohn:T.12-13,31-32(27-Jun-2017). *Cross-reference* Section [II.F.1\(b\)\(i\)b](#).

<sup>1963</sup> [P00101](#); [P00108](#); [P00116](#), p.4; [P00129](#); [REDACTED].

<sup>1964</sup> DRAČAAco:T.4-5,58-59,67-71(28-Nov-2019); DRAČAAco:T.66(3-Dec-2019); [P00122](#); [REDACTED]; [P00118](#), p.1.

<sup>1965</sup> [P00131](#), p.3; [REDACTED].

<sup>1966</sup> [P03413](#); [REDACTED]; [REDACTED]; [REDACTED]; [P00164](#), p.3,5-6; WILSONJohn:T.60(27-Jun-2017); [REDACTED]; WILSONJohn:T.46-47(4-July-2017); ĐUKIĆPetar:T.15,25-26(21-Jan-2020); [REDACTED]; [2D00144](#), p.3; [REDACTED].

<sup>1967</sup> RFJ-113:T.50-51(27-Sep-2017); [REDACTED]; [REDACTED]; RFJ-113:T.41(26-Sep-2017); ĐUKIĆPetar:T.13(21-Jan-2020). See DRAČAAco:T.16-18(3-Dec-2019).

<sup>1968</sup> [REDACTED]; [P00125](#), p.15; [P00124](#), p.26; [REDACTED].

<sup>1969</sup> [REDACTED]; [REDACTED]; [2D00144](#).

<sup>1970</sup> [REDACTED]; [P00107](#), p.4,6; [REDACTED]; [P03369](#), p.2; [P03357](#), p.1.

463. **STANIŠIĆ** used his considerable authority to perpetuate the RSK-MUP's complicity in crimes. Undoubtedly aware of the ongoing campaign of crimes against non-Serbs and the prevention of their return, [REDACTED]. [REDACTED].<sup>1971</sup> Despite **STANIŠIĆ**'s influence over the dismissal of police commanders<sup>1972</sup> if they were insufficiently vigilant in protecting groups whose removal would have difficult political consequences,<sup>1973</sup> he allowed the climate of impunity to persist. Moreover, **STANIŠIĆ** actively intervened years later, in September 1994, to prevent attempts to remove KOSTIĆ<sub>(DB)</sub> from his Assistant MUP Minister position on the basis of KOSTIĆ<sub>(DB)</sub>'s involvement in crime in Baranja and Slavonia.<sup>1974</sup>

#### **4. The Accused and their co-JCE members implemented the CCP in BiH (1991-1993)**

464. As the Serb Forces' criminal campaign raged across Serb-claimed territories in Croatia,<sup>1975</sup> the Accused and co-JCE members prepared to implement the CCP in BiH. **STANIŠIĆ** and MILOŠEVIĆ collaborated with KARADŽIĆ from an early stage to prepare separate Serb governing, police, and military structures, and ensure that the Bosnian Serbs' political actions advanced the CCP. Their collaboration with the Bosnian Serb leadership at this crucial preparatory stage was unwavering, even as KARADŽIĆ publicly threatened Bosnian Muslims with "possible extinction".<sup>1976</sup>

465. From early 1991, Belgrade JCE members promoted the SDS's regionalisation program. In May, **STANIŠIĆ** and KARADŽIĆ plotted over maps about how to seize power across BiH.<sup>1977</sup> This meant removing non-Serbs: the following month the SDS called for maps detailing each municipality's ethnic composition<sup>1978</sup> and KARADŽIĆ confirmed that "his people" were "ready to reorganise the municipalities".<sup>1979</sup> By July, bolstered by Belgrade JCE members' support, KARADŽIĆ foreshadowed separate Serb

<sup>1971</sup> [REDACTED]; [REDACTED].

<sup>1972</sup> [REDACTED]; [REDACTED].

<sup>1973</sup> [REDACTED]; [P03394](#), p.6-7,9,12(focusing in particular on Czechs, Slovaks, and Ruthenians, and noting pressure from the international community, as the UN provided precise data on expulsions every day).

<sup>1974</sup> [P03818](#), p.1(p.1(BCS))("NRDB" followed by "Jovica" is handwritten at the top of the report); DRAČAAco:T.35-36,40(3-Dec-2019). See [REDACTED].

<sup>1975</sup> Cross-reference Section [II.F.1](#); Section [II.F.2](#); Section [III.B.1](#); Section [III.B.2](#).

<sup>1976</sup> [P01588](#), p.1.

<sup>1977</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13082. See AF710-AF711.

<sup>1978</sup> See AF715.

<sup>1979</sup> [P01438](#), p.7.



structures<sup>1980</sup> and privately expressed: “let there be war”.<sup>1981</sup> Secure in the knowledge that they enjoyed MILOŠEVIĆ’s support, including the SerbianDB’s covert training and personnel resources<sup>1982</sup> and the JNA’s military might, the SDS were ready to carry out the CCP to devastating effect.

466. With conflict looming in early 1992, **SIMATOVIĆ**’s Unit trained Serb Forces in preparation to violently take over targeted municipalities.<sup>1983</sup> As BiH declared its independence, the Accused deployed ARKAN and his SDG to fulfill KARADŽIĆ’s threat, unleashing hell in Bijeljina and Zvornik<sup>1984</sup> while the Unit attacked non-Serbs in Bosanski Šamac and Doboj.<sup>1985</sup> Months of persecutory crimes, detentions, and forcible displacement followed, aiming to rid targeted areas of non-Serbs. In 1993, **STANIŠIĆ**, **SIMATOVIĆ**, **MLADIĆ**, and others deployed their Serb Forces into Operation Udar to eliminate Muslims from the Podrinje region, furthering the CCP. **SIMATOVIĆ** commanded the Unit in this scorched-earth operation.

(a) Serbs prepared separate Serb structures and forces leading up to the conflict in BiH

467. Belgrade and BiH JCE members were already planning for ethnic division in BiH by April 1991. MILOŠEVIĆ and KARADŽIĆ had been collaborating with ever-increasing intensity since the autumn of 1990, pursuing their shared goals.<sup>1986</sup> By spring 1991, the Accused and other JCE members launched a series of political maneuvers laying the groundwork for a separate Serb state. As 1992 dawned, BiH JCE members

<sup>1980</sup> See AF719.

<sup>1981</sup> [P03456](#), p.9.

<sup>1982</sup> See [P02772](#), p.3-4(mentioning having established something “like Golubić” and urging KARADŽIĆ to visit); NIELSENChristian:[P00850](#), para.515; NIELSENChristian:T.6-7(15-Nov-2017). See also [P02780](#)(**STANIŠIĆ** informs KARADŽIĆ that he is with “Frenki and Captain” and they exchange “best regards”; **STANIŠIĆ** tells KARADŽIĆ, “I hope we’ll get to work with you a little”).

<sup>1983</sup> Cross-reference Section [II.E.4\(d\)](#).

<sup>1984</sup> [P01588](#), p.1.

<sup>1985</sup> Cross-reference Section [III.C.](#)

<sup>1986</sup> [REDACTED]. The 32 admitted intercepted conversations between MILOŠEVIĆ and KARADŽIĆ establish that they spoke, on average, every few days between 29 May 1991 and 24 September 1991 to consult and collaborate: [P01437](#)(29-May-1991); [P03702](#)(4-Jun-1991); [P03703](#)(4-Jun-1991); [P03704](#)(11-Jun-1991); [P03705](#)(12-Jun-1991); [P01440](#)(17-Jun-1991); [P01447](#)(28-Jun-1991); [P01448](#)(1-Jul-1991); [P01449](#)(8-Jul-1991); [P03706](#)(8-Jul-1991); [P03707](#)(9-Jul-1991); [P01450](#)(9-Jul-1991); [P01451](#)(29-Jul-1991); [P03708](#)(31-Jul-1991); [P03709](#)(6-Aug-1991); [P03710](#)(7-Aug-1991); [P01452](#)(9-Aug-1991); [P03722](#)(the Prosecution submits that—based on its contents—this intercept was mis-dated 20 December 1991, and in fact dates from 6 September 1991); [P01463](#)(9-Sep-1991); [P01506](#)(although dated December 1991, the Prosecution submits that its content—which discusses MARTIĆ’s arrest—reveals this intercept to be from September 1991); [P01471](#)(10-Sep-1991); [P03711](#)(13-Sep-1991); [P01472](#)(18-Sep-1991); [P02880](#)(19-Sep-



declared that state into existence. They collaborated with Belgrade JCE members to establish Serb police and army, relying in the meantime on the military power of paramilitary groups sent from Belgrade. By the end of the spring, the BiH JCE members publicly articulated their priorities as the Six Strategic Goals, the most important being ethnic separation from non-Serbs.

(i) Backed by MILOŠEVIĆ, Bosnian Serbs used regionalisation to delineate Serb territory in BiH

468. In April 1991, while MILOŠEVIĆ met secretly with TUĐMAN to discuss the potential division of BiH,<sup>1987</sup> KARADŽIĆ—then the Bosnian SDS President<sup>1988</sup>—and the Bosnian SDS agreed that BiH should be partitioned by ethnicity.<sup>1989</sup> On KARADŽIĆ's instructions, municipal SDS leaders prepared maps showing each territory's ethnic composition.<sup>1990</sup>

469. KARADŽIĆ's SDS had already begun the regionalisation process, establishing new communities of municipalities designed to take power in areas where Serbs lived in substantial numbers, to the non-Serb population's detriment.<sup>1991</sup> These communities proliferated and ultimately developed into autonomous areas: five SAOs and the Krajina region, the ARK.<sup>1992</sup> As it became apparent that Serbs would use force to oppose BiH's secession from Yugoslavia,<sup>1993</sup> as a unitary state, the autonomous areas became the physical foundation of the planned Serb entity in BiH.<sup>1994</sup>

470. STANIŠIĆ met with KARADŽIĆ and SAO-Krajina leaders BABIĆ and MARTIĆ in May 1991 to analyse where Bosnian Serbs already had control and areas where the SDS would need to establish it.<sup>1995</sup> STANIŠIĆ and KARADŽIĆ planned to

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1991); [P03712](#)(19-Sep-1991); [P03713](#)(19-Sep-1991); [P03714](#)(20-Sep-1991); [P03715](#)(20-Sep-1991); [P03716](#)(23-Sep-1991); [P01473](#)(23-Sep-1991); [P01475](#)(24-Sep-1991).

<sup>1987</sup> DERONJIĆMiroslav:[P01718](#), T.892,895,899-900,1144,1193; DERONJIĆMiroslav:[P01719](#), T.29623; [REDACTED]; SAVIĆBorivoje:[P00449](#), para.75; DONIARobert:[P01600](#), p.20.

<sup>1988</sup> DONIARobert:[P01600](#), p.26-27; BABIĆMilan:[P01246](#), T.12896; [REDACTED]; BABIĆMilan:[P01560](#), para.5.

<sup>1989</sup> DERONJIĆMiroslav:[P01718](#), T.896-900,1137.

<sup>1990</sup> DERONJIĆMiroslav:[P01718](#), T.900-902,1146-1150. See AF715.

<sup>1991</sup> DONIARobert:T.15-16,28(30-Jan-2018); DONIARobert:T.53-54(31-Jan-2018);

DONIARobert:[P01600](#), p.32-33. See DERONJIĆMiroslav:[P01719](#), T.29752.

<sup>1992</sup> DONIARobert:[P01600](#), p.33-35; DONIARobert:T.32(31-Jan-2018); DONIARobert:T.39(2-Feb-2018).

<sup>1993</sup> See AF712.

<sup>1994</sup> DERONJIĆMiroslav:[P01719](#), T.29624; THEUNENSReynaud:[P01980](#), p.373; [P03549](#), p.3-4. See AF457; AF487.

<sup>1995</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13082.

transform the existing associations of municipalities and establish others to resist IZETBEGOVIĆ's secessionist efforts<sup>1996</sup> and ultimately unite different areas of BiH under Serb control.<sup>1997</sup> BABIĆ understood from this meeting that they would use the police,<sup>1998</sup> just as the Accused had done in SAO-Krajina and SAO-SBWS.<sup>1999</sup>

471. Regionalisation plans were premised on Bosnian Serbs remaining in Yugoslavia while concealing their vision for a separate Serb territory within it. By the time the Bosnian Krajina sought to unite with SAO-Krajina in June 1991,<sup>2000</sup> MILOŠEVIĆ had already enlisted KARADŽIĆ's support for his plan to shroud their true territorial ambitions in BiH.<sup>2001</sup> With STANIŠIĆ acting as an enforcer to ensure the compliance of BABIĆ and Bosnian Krajina leader Radoslav BRĐANIN,<sup>2002</sup> MILOŠEVIĆ and KARADŽIĆ made clear that they objected to unifying the Kralinas, preferring to wait for Bosnian Muslims to make an objectionable move so that KARADŽIĆ could "settle accounts" by "expelling the Muslims and forcing them into the river valleys", revealing their intention to link BiH's Serb territories through the CCP crimes.<sup>2003</sup> KARADŽIĆ would have the support of the JNA, and—with STANIŠIĆ's assistance—Serbs among the then-BiH-MUP.<sup>2004</sup>

472. In July 1991, MILOŠEVIĆ remarked that "all the moves that I made so far have been very fruitful", to which KARADŽIĆ replied, "I tell it to these associates of mine, that nothing is done without aim and purpose[...]."<sup>2005</sup>

(ii) JCE members established the separate Serb civilian and military structures that would comprise Republika Srpska

473. As in Croatia, the Accused, MILOŠEVIĆ, and other Belgrade JCE members exercised significant influence over BiH JCE members in developing Serb political, police, and military structures in BiH, which would be used as a framework for

<sup>1996</sup> DONIA Robert: [P01600](#), p.33. See AF710.

<sup>1997</sup> [REDACTED].

<sup>1998</sup> [REDACTED].

<sup>1999</sup> Cross-reference Section [II.F.1\(a\)\(i\)a](#); Section [II.F.1\(b\)\(i\)a-b](#); Section [II.F.2\(d\)-\(e\)](#).

<sup>2000</sup> Cross-reference Section [II.F.1\(a\)](#).

<sup>2001</sup> Cross-reference Section [II.F.1\(a\)](#).

<sup>2002</sup> [P02772](#), p.2,6; NIELSEN Christian: T.5(15-Nov-2017).

<sup>2003</sup> BABIĆ Milan: [P01246](#), T.13054-13055; [REDACTED]; BABIĆ Milan: [P01244](#), para.2; [P02878](#), p.1-2,5; [P02772](#), p.1-2; DONIA Robert: [P01600](#), p.37.

<sup>2004</sup> Cross-reference Section [II.F.4\(a\)\(ii\)b.ii](#); BABIĆ Milan: [P01246](#), T.13056; [REDACTED]; BABIĆ Milan: [P01244](#), para.1.

<sup>2005</sup> [P03706](#), p.2.

advancing the CCP.<sup>2006</sup> KARADŽIĆ, KRAJIŠNIK, PLAVŠIĆ, M. STANIŠIĆ, and MLADIĆ consulted STANIŠIĆ and MILOŠEVIĆ [REDACTED].<sup>2007</sup> Accepting the human cost of their criminality, graphically demonstrated in Croatia, JCE members remained committed to establishing Serb authority in BiH through violent ethnic separation and fear.

a. Advised by MILOŠEVIĆ and STANIŠIĆ, the BiH JCE members created Serb governing organs to implement ethnic separation

474. In October 1991, while Serb Forces expelled non-Serbs from the SAOs in Croatia, KARADŽIĆ's rhetoric became increasingly violent. He privately referred to Bosnian Muslims' potential "annihilation",<sup>2008</sup> warning that if they started a war, they would "disappear from the face of the earth",<sup>2009</sup> threatening, "they will disappear! Sarajevo will be a melting pot in which 300,000 Muslims will die", and stating, "there would be bloodshed [...] the Muslim people would be exterminated".<sup>2010</sup> As the multi-ethnic BiH Assembly considered adopting a declaration of Bosnian sovereignty at its session on 14 and 15 October 1991, KARADŽIĆ brought this inflammatory rhetoric into the public sphere,<sup>2011</sup> threatening that separating BiH from Yugoslavia would take BiH on a "highway of hell", and "bring Muslim people to a possible extinction".<sup>2012</sup>

475. After the BiH Assembly adopted the sovereignty declaration notwithstanding KARADŽIĆ's threats,<sup>2013</sup> on 18 October 1991 KARADŽIĆ, instructed SDS leaders to urgently form Serb crisis staffs in Serb-claimed municipalities,<sup>2014</sup> which they would later use for persecuting and forcibly displacing non-Serbs.<sup>2015</sup>

476. Belgrade JCE members worked behind the scenes with the Bosnian Serb leadership to establish these separate structures. On 23 October 1991, MILOŠEVIĆ summoned KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ along with HADŽIĆ and BABIĆ to meet in Belgrade, where they discussed their respective regions' support for

<sup>2006</sup> Cross-reference Section [II.F.1\(a\)\(i\)](#); Section [II.F.2\(a\)](#).

<sup>2007</sup> [REDACTED].

<sup>2008</sup> [P01479](#), p.2.

<sup>2009</sup> [P01477](#), p.2; BABIĆ Milan: [P01246](#), T.13072.

<sup>2010</sup> [P01477](#), p.7. See also [P01478](#), p.3.

<sup>2011</sup> DERONJIĆ Miroslav: [P01718](#), T.910,1149,1163.

<sup>2012</sup> [P01588](#), p.1; [P03548](#); DONIA Robert: T.20-23(30-Jan-2018); [P01600](#), p.46.

<sup>2013</sup> DERONJIĆ Miroslav: [P01726](#), p.20. See AF451; AF452.

<sup>2014</sup> DERONJIĆ Miroslav: [P01718](#), T.911-912; [P01733](#), p.83-84.

MILOŠEVIĆ's concept of a federal Yugoslavia.<sup>2016</sup> The very next day, the SDS deputies established an Assembly,<sup>2017</sup> which immediately passed a resolution declaring their intention to remain in Yugoslavia, as discussed the day before in Belgrade.<sup>2018</sup> KARADŽIĆ urged Bosnian Serbs to "seize power wherever you can" in what would be a "fight to the finish, a battle for living space".<sup>2019</sup>

477. Despite the publicity KARADŽIĆ's increasingly bellicose rhetoric received,<sup>2020</sup> STANIŠIĆ's and MILOŠEVIĆ's covert support did not waver.<sup>2021</sup> When KARADŽIĆ and MILOŠEVIĆ spoke on the day the RS Assembly was established, little more than a week after KARADŽIĆ's "highway to hell" speech, KARADŽIĆ confirmed to MILOŠEVIĆ that the Bosnian Serbs intended to take over large portions of BiH.<sup>2022</sup> Several days later, MILOŠEVIĆ assured KARADŽIĆ that he should receive a visit from STANIŠIĆ,<sup>2023</sup> who would arrange a secure means of communication between them.<sup>2024</sup> STANIŠIĆ and KARADŽIĆ communicated more frequently,<sup>2025</sup> and by mid-December, STANIŠIĆ told KARADŽIĆ that he was ready to send men to BiH, which they agreed should happen as soon as possible.<sup>2026</sup>

478. On 19 December 1991, via the SDS Main Board, KARADŽIĆ issued strictly confidential "Instructions for the Organisation and Activity of Organs of the Serbian People in Bosnia and Herzegovina in Extraordinary Circumstances" ("Variant A/B

<sup>2015</sup> Cross-reference Section [II.F.4\(b\)\(i\)a](#); Section [II.F.4\(b\)\(iii\)b](#); Section [III.C.1\(b\)](#); Section [III.C.2\(b\)](#); Section [III.C.6\(c\)](#).

<sup>2016</sup> [REDACTED]; BABIĆMilan:[P01244](#), para.7. Although the meeting's occurrence was reported in the media, MILOŠEVIĆ's presence was not: a measure designed to give the impression that the Bosnian and Croatian Serbs supported MILOŠEVIĆ's policies without his input. [REDACTED].

<sup>2017</sup> [P03553](#), p.1-2; THEUNENSReynaud:[P01980](#), p.372. See AF454.

<sup>2018</sup> [P03553](#), p.2-3. See AF474.

<sup>2019</sup> [1D00076](#), p.12. See AF459.

<sup>2020</sup> [P01480](#), p.1.

<sup>2021</sup> As 1991 turned to 1992, KARADŽIĆ regularly consulted MILOŠEVIĆ on political strategy: [P03717](#)(14-Nov-1991); [P02778](#)(15-Nov-1991); [P03718](#)(18-Nov-1991); [P03720](#)(22-Nov-1991); [P03721](#)(25-Nov-1991); [P02783](#)(17-Dec-1991); [P03723](#)(15-Jan-1992).

<sup>2022</sup> [1D00075](#), p.5-8.

<sup>2023</sup> [P01491](#), p.4.

<sup>2024</sup> [REDACTED]; [P01590](#), p.6(21-Dec-1991).

<sup>2025</sup> [1D00075](#), p.3; [P01471](#), p.4(KARADŽIĆ referred to STANIŠIĆ as "Joca"). Beginning in late November 1991, STANIŠIĆ was in telephone contact with KARADŽIĆ every few days: [P02779](#)(28-Nov-1991); [P02780](#)(29-Nov-1991); [P01505](#)(14-Dec-1991); [P01590](#)(21-Dec-1991); [P02785](#)(29-Dec-1991); [REDACTED]; [1D00060](#)(5-Jan-1992); [1D00059](#)(6-Jan-1992); [REDACTED]; [1D01361](#)(7-Jan-1992); [P02787](#)(7-Jan-1992); [P01512](#)(12-Jan-1992); [P02789](#)(22-Jan-1992); [P02790](#)(22-Jan-1992); [P02791](#)(25-Jan-1992); [P02792](#)(28-Jan-1992).

<sup>2026</sup> [P01505](#), p.3-5; NIELSENChristian:T.20-21(21-Nov-2017).

Instructions”) to the Presidents of the SDS Municipal Boards.<sup>2027</sup> The Variant A/B Instructions prescribed distinct steps for establishing Serb control<sup>2028</sup> in Serb-majority (Variant A) and Serb-minority (Variant B) municipalities<sup>2029</sup> by establishing a Serb Municipal Assembly, a Serb Crisis Staff, and a Serb police force in each municipality<sup>2030</sup> on KARADŽIĆ’s order.<sup>2031</sup> In Variant B Serb-minority municipalities, the preparatory steps were to be taken secretly since they were anticipated to lead to war.<sup>2032</sup> The Variant A/B Instructions were quickly implemented to varying degrees across many BiH municipalities,<sup>2033</sup> as outlined below.<sup>2034</sup>

479. As BiH moved towards secession,<sup>2035</sup> the RS Assembly prepared to establish a Serb republic.<sup>2036</sup> At its fourth session, broadcast live on Belgrade television, KARADŽIĆ used the recent plebiscite result to justify claiming broad swathes of BiH territory, even where Serbs were a minority: “all territories where we voted in our referendum to remain within Yugoslavia must stay within Yugoslavia if we decide so”.<sup>2037</sup> Regarding Sarajevo, KARADŽIĆ advocated for “as much separation as possible” between the ethnicities, predicting a bloodbath and massive population transfers.<sup>2038</sup>

480. On 9 January 1992, the RS Assembly proclaimed the foundation of RS.<sup>2039</sup> In the days preceding this proclamation, **STANIŠIĆ** had worked closely with KARADŽIĆ to shape Bosnian Serb strategy as they awaited the European Commission’s decision on BiH independence.<sup>2040</sup> On 6 January, KARADŽIĆ had sought **STANIŠIĆ**’s advice,<sup>2041</sup>

<sup>2027</sup> [P01589/P01722/P02479](#)(duplicates); DERONJIĆMiroslav:[P01717](#), para.45; DERONJIĆMiroslav:[P01718](#), T.930-931,939; DERONJIĆMiroslav:[P01719](#), T.29624-29626; DONIARobert:T.26-28(30-Jan-2018). See AF497.

<sup>2028</sup> DERONJIĆMiroslav:[P01717](#), para.45; DONIARobert:T.27(30-Jan-2018).

<sup>2029</sup> [P01589](#), p.2-6. See AF498.

<sup>2030</sup> [P01589](#), p.2-6; DONIARobert:T.27-28(30-Jan-2018).

<sup>2031</sup> See AF500.

<sup>2032</sup> DERONJIĆMiroslav:[P01718](#), T.1174-1177; DONIARobert:T.28(30-Jan-2018); DONIARobert:T.54-56(31-Jan-2019); [P01597](#), p.80.

<sup>2033</sup> [P01732](#), p.12; DERONJIĆMiroslav:[P01718](#), T.933,940; DERONJIĆMiroslav:[P01719](#), T.29626; DONIARobert:T.29-30(30-Jan-2018). *Cross-reference* Section [II.F.4\(b\)\(i\)b](#); Section F.4(b)(iii)b. See AF511; AF513.

<sup>2034</sup> *Cross-reference* Section [II.F.4\(b\)](#).

<sup>2035</sup> On 20 December 1991, over PLAVŠIĆ’s and KOLJEVIĆ’s dissents, the BiH Presidency voted to apply to the newly-established European Badinter Commission for recognition of BiH’s independence. DONIARobert:[P01600](#), p.47-48.

<sup>2036</sup> [ID01171](#), p.14-15; DONIARobert:[P01600](#), p.48.

<sup>2037</sup> [ID01171](#), p.3,38-40; [P01597](#), p.9; DONIARobert:T.30-31(30-Jan-2018).

<sup>2038</sup> DONIARobert:[P01597](#), p.20-21,93-94; DONIARobert:T.33-34(30-Jan-2018).

<sup>2039</sup> [P03551](#); DONIARobert:T.36(30-Jan-2018); [P01600](#), p.48; THEUNENSReynaud:[P01980](#), p.374-375. See AF495; AF517. See also [P03552](#); [P03554](#); AF524.

<sup>2040</sup> [P02785](#)(29-Dec-1991); [REDACTED].

<sup>2041</sup> [ID00059](#), p.1.

and—in the same call—spoke with SMUP Minister SOKOLOVIĆ, who reassured KARADŽIĆ that “we’ll do everything Jovica said we would do”.<sup>2042</sup> KARADŽIĆ sought STANIŠIĆ’s counsel again the next day. STANIŠIĆ told KARADŽIĆ that he “would really love to see [him]”, it was “very, very, very important” that they meet, but that STANIŠIĆ could not go to KARADŽIĆ because he could not afford to be seen as “a part of the initiative”.<sup>2043</sup> This makes clear that STANIŠIĆ, who at the time was clearly acting well beyond the scope of his position as Head of the SerbianDB—as he had done as part of *vojna linija* in Croatia<sup>2044</sup>—needed to conceal his role in coordinating with the Bosnian Serbs at this crucial stage.

481. The next week, KARADŽIĆ told STANIŠIĆ that they had “prepared divine variants”, had “foreseen every possible situation”, and were “only one step away from the favourable ending”.<sup>2045</sup> Following the European Commission’s recommendation that BiH hold a referendum on secession, KARADŽIĆ and STANIŠIĆ contemplated the possibility of an all-out war if BiH were divided.<sup>2046</sup> KARADŽIĆ told STANIŠIĆ that unless the situation could be resolved between the Croats and the Serbs, there would be “thirty years of torture [...] with all sorts of things”, to which STANIŠIĆ replied “[w]ith killings”. They discussed that the parties should be pushed to go to Belgrade; otherwise, STANIŠIĆ warned, “we’ll exterminate them completely [...] if they want it, they’ll have it. Then we’ll have an all-out war”.<sup>2047</sup>

b. In collaboration with STANIŠIĆ, BiH JCE members established the RS-MUP under Mićo STANIŠIĆ

482. MILOŠEVIĆ influenced the development of the fledgling Bosnian Serb police through STANIŠIĆ.<sup>2048</sup> [REDACTED].<sup>2049</sup> Six days after STANIŠIĆ warned of extermination and all-out war, KARADŽIĆ updated him on the growing numbers of BiH reserve police being mobilised by the SDA. Foreshadowing the pivotal role he would

<sup>2042</sup> [1D00059](#), p.2.

<sup>2043</sup> [P01512](#), p.2-3,7.

<sup>2044</sup> Cross-reference Section [II.E.1\(a\)](#).

<sup>2045</sup> [P01512](#), p.6-7.

<sup>2046</sup> [P02790](#), p.5-7(Although the intercept discussed by DONIA was admitted as [P01612](#), the same intercept was subsequently admitted with transcript through RFJ-146 as [P02790](#)); DONIA Robert:T.58-60(2-Feb-2018).

<sup>2047</sup> [P02790](#), p.7.

<sup>2048</sup> [P00004](#), p.32.

<sup>2049</sup> [REDACTED].



play in developing and steering police structures in BiH, **STANIŠIĆ** reassured **KARADŽIĆ**, “Never mind the reservists, that’s the reserve, we have other, more dangerous frameworks and connotations than that.”<sup>2050</sup>

i. **STANIŠIĆ** and the SMUP supported BiH JCE members as they established a separate Serb MUP and police stations and units

483. As in the Croatian SAOs,<sup>2051</sup> the Bosnian Serb political strategy entailed establishing a separate, ethnically Serb police force.<sup>2052</sup> The RS-MUP would play a critical role in JCE members’ pursuit of the CCP in BiH, particularly in the earliest stages of the conflict. Until the establishment of the VRS on 12 May 1992,<sup>2053</sup> the RS-MUP was the Bosnian Serb leadership’s only armed force.<sup>2054</sup> As JCE member **PLAVŠIĆ** made clear during a January 1992 RS Assembly session, the Serbs intended to use the RS-MUP as a fighting force: “It is known what the making of a state means. First, the Ministry of Internal Affairs will do whatever is necessary to have its own army.”<sup>2055</sup>

484. The RS-MUP was one of the first institutions of the nascent RS to begin functioning.<sup>2056</sup> At a meeting on 11 February, JCE member **Miće STANIŠIĆ**, BiH Assistant Minister of the Interior **Momčilo MANDIĆ**,<sup>2057</sup> and other Serb members of the BiH-MUP/DB decided to create a separate Serb MUP in BiH.<sup>2058</sup> **Predrag JEŠURIĆ**, CSB Bijeljina Chief with links to **STANIŠIĆ**,<sup>2059</sup> reported that he had already been in contact with the SMUP, “which ha[d] been very helpful”.<sup>2060</sup> The meeting concluded with **MANDIĆ** being appointed to head a BiH-MUP “Serbian Advisory Board”, which would “carry out all necessary preparations for the functioning” of the RS-MUP.<sup>2061</sup> On 28 February 1992, the RS Assembly enacted the RS Law on Internal Affairs, which, besides formally establishing the RS-MUP and defining the parameters of its responsibilities, specified that BiH CSBs and SJBs on RS territory would be closed and

<sup>2050</sup> [P02792](#), p.5; **KARADŽIĆ** and others had been concerned about the increasing numbers of Muslim reservists since the previous fall. NIELSENChristian:[P00850](#), para.506,516-519.

<sup>2051</sup> Cross-reference Section [II.F.1\(a\)\(i\)a](#); Section [II.F.1\(b\)\(i\)a-b](#); Section [II.F.2\(d\)-\(e\)](#).

<sup>2052</sup> NIELSENChristian:[P00850](#), para.524; [P03470](#).

<sup>2053</sup> Cross-reference Section [II.F.4\(a\)\(ii\)d](#).

<sup>2054</sup> NIELSENChristian:[P00850](#), para.640.

<sup>2055</sup> NIELSENChristian:[P00850](#), para.640.

<sup>2056</sup> AF643. See AF655; AF689.

<sup>2057</sup> NIELSENChristian:[P00850](#), para.500; [P03748](#), p.1(**MANDIĆ** was Assistant Minister at the end of March 1992).

<sup>2058</sup> [P03472](#), p.4; NIELSENChristian:[P00850](#), para.556-559.

<sup>2059</sup> [REDACTED]; [1D00036](#), p.76.

<sup>2060</sup> [P03472](#), p.2.



reopened under the RS-MUP, and invited BiH-MUP “employees of Serbian nationality and other employees who so desire” to take employment in the RS-MUP.<sup>2062</sup>

485. From the beginning, the RS-MUP was intended to be instrumental in seizing and controlling Serb territory. Elements of the police force were in place by the 18 March 1992 RS Assembly session, where KRAJIŠNIK called for “ethnic separation on the ground”, and another attendee expounded that a Serb police force and MUP were necessary to enable Serbs to seize control of “their territories”.<sup>2063</sup> KARADŽIĆ echoed this sentiment at the next session, on 24 March, noting that when the police force was established, “[a]t that moment, all the Serbian municipalities, both the old ones and the newly established ones, would literally assume control over the entire territory of the municipality concerned”.<sup>2064</sup>

486. In late March, JCE member M.STANIŠIĆ was appointed RS Minister of Internal Affairs.<sup>2065</sup> [REDACTED],<sup>2066</sup> [REDACTED].<sup>2067</sup> [REDACTED],<sup>2068</sup> [REDACTED].<sup>2069</sup> [REDACTED].<sup>2070</sup> [REDACTED],<sup>2071</sup> [REDACTED].<sup>2072</sup>

487. On 31 March, MANDIĆ sent a memorandum (“MANDIĆ Memorandum”) to all levels of the BiH-MUP, announcing that an RS-MUP had been established, the RS Law on Internal Affairs would come into force the next day, and RS-MUP structures would take over the BiH-MUP’s functions on RS territory.<sup>2073</sup> BiH-MUP employees from the abolished CSBs and SJBs wishing to transfer to the RS-MUP would be obliged to swear allegiance to M.STANIŠIĆ.<sup>2074</sup> Over the following weeks, police throughout what would soon become RS territory divided along ethnic lines.<sup>2075</sup>

<sup>2061</sup> [P03472](#), p.4. *See* AF521.

<sup>2062</sup> [P02965](#), p.17; NIELSENChristian:[P00850](#), para.600-622. *See* AF625; AF626; AF627; AF628.

<sup>2063</sup> NIELSENChristian:[P00850](#), para.579. *See* AF655.

<sup>2064</sup> NIELSENChristian:[P00850](#), para.582; DONIARRobert:[P01597](#), p.81; DONIARRobert:[P01598](#), p.8. *See also* [P03555](#).

<sup>2065</sup> NIELSENChristian:[P00850](#), para.585,592. *See* AF646; AF655.

<sup>2066</sup> [REDACTED].

<sup>2067</sup> [REDACTED]. *See also* AF650.

<sup>2068</sup> [REDACTED].

<sup>2069</sup> [REDACTED].

<sup>2070</sup> [REDACTED]

<sup>2071</sup> [REDACTED]. *See also* [P01628](#); [REDACTED].

<sup>2072</sup> [REDACTED].

<sup>2073</sup> [P03474](#), p.1; LUKAČDragan:[P02731](#), p.15; [REDACTED]. *See* AF690; AF655; [P03748](#).

<sup>2074</sup> [P03474](#), p.2. KARADŽIĆ also withdrew Serb public sector employees from BiH government positions: [P03109](#).

<sup>2075</sup> *See* [P03475](#). Cross-reference Section [II.F.4](#); Section [III.C](#).

488. **STANIŠIĆ** was instrumental in setting up the Serb police in BiH, just as he had been in Croatia.<sup>2076</sup> Anticipating that Bosnian Muslims and Croats would oppose its establishment, Bosnian Serb leaders had recognised the need for such assistance since the earliest days of its planning.<sup>2077</sup> [REDACTED]<sup>2078</sup> [REDACTED]<sup>2079</sup> [REDACTED].<sup>2080</sup> As conflict loomed in March 1992, **KARADŽIĆ** requested assistance from the FSUP.<sup>2081</sup> Bosnian Serbs and the FSUP then formalised this cooperation in a plan that provided for the deployment of both FSUP and SMUP personnel to support the RS-MUP.<sup>2082</sup> Pero **MIHAJLOVIĆ**, [REDACTED],<sup>2083</sup> was designated to coordinate between the FSUP, SMUP, and RS-MUP.<sup>2084</sup> Simultaneously, **STANIŠIĆ** continued to approve the transfer of weapons and material support to the RS-MUP.<sup>2085</sup>

489. [REDACTED],<sup>2086</sup> [REDACTED].<sup>2087</sup> [REDACTED].<sup>2088</sup> [REDACTED].<sup>2089</sup> [REDACTED]<sup>2090</sup> [REDACTED].<sup>2091</sup> **STANIŠIĆ** stayed connected to this RS-MUP special unit in subsequent years, proposing to send 100-120 SMUP men to assist it in late 1993.<sup>2092</sup>

ii. **STANIŠIĆ** and **SIMATOVIĆ** were informed about and influenced events in BiH through the RS-SNB and other intelligence groups

490. As they had done in Croatia, **STANIŠIĆ** and **SIMATOVIĆ** coopted MUP and security structures to establish parallel lines of reporting and authority, ensuring that they had sufficient information and influence to advance the CCP in BiH. As **STANIŠIĆ** told

<sup>2076</sup> Other SerbianDB personnel also provided crucial assistance: **SIMATOVIĆ**, **TEPAVČEVIĆ**<sub>(DB)</sub>, **KOSTIĆ**<sub>(DB)</sub>, and Radojica **BOŽOVIĆ**<sub>(DB)</sub> all appeared on list of people and organisations who were officially thanked by the RS-MUP. [P01789](#).

<sup>2077</sup> [P03544](#), p.5-6; [P03546](#), p.9; [REDACTED]; NIELSENChristian:[P00850](#), para.861.

<sup>2078</sup> [REDACTED].

<sup>2079</sup> [REDACTED].

<sup>2080</sup> [REDACTED].

<sup>2081</sup> [P00155](#), p.18.

<sup>2082</sup> NIELSENChristian:[P00850](#), para.863; [P03479](#), p.1.

<sup>2083</sup> [REDACTED].

<sup>2084</sup> NIELSENChristian:[P00850](#), para.863.

<sup>2085</sup> [REDACTED]; [P01628](#), p.1; [P03481](#); [P03207](#), p.14.

<sup>2086</sup> Cross-reference Section [II.E.1\(e\)](#).

<sup>2087</sup> [REDACTED]; [P01626](#).

<sup>2088</sup> [REDACTED].

<sup>2089</sup> [REDACTED].

<sup>2090</sup> [REDACTED].

<sup>2091</sup> [REDACTED].

<sup>2092</sup> [1D00036](#), p.60; MILOVANOVIĆManojlo:[P02935](#), T.15446-15448.

KARADŽIĆ in early 1992, “I don’t know how much you know, but *we* know everything.”<sup>2093</sup>

491. Bosnian Serb personnel employed within the BiH DB had been covertly channeling information to the SerbianDB since mid-1991. Under the code-name “Miloš”, Predrag RADULOVIĆ<sub>(DB)</sub>,<sup>2094</sup> a Serb in the Banja Luka DB, bypassed official channels, reporting directly to the Accused and taking instructions from the SerbianDB on arming Serbs, among other activities.<sup>2095</sup>

492. [REDACTED].<sup>2096</sup> [REDACTED].<sup>2097</sup> [REDACTED].<sup>2098</sup> **STANIŠIĆ** retained control over RADULOVIĆ<sub>(DB)</sub> and his “Miloš” group once they came under the RS-SNB and as the conflict unfolded.<sup>2099</sup>

493. The Accused’s control over the RS-MUP/SNB extended to the Banja Luka-based Tajfun/Sigma intelligence group. After meeting with **STANIŠIĆ**, **MILOŠEVIĆ**, **KERTES**, and **KARADŽIĆ** in Belgrade in March 1992, the SerbianDB began equipping the Tajfun group, which in turn reported to the SerbianDB, coordinating in line with the “concept of unification into Serbian states”.<sup>2100</sup> Tajfun established 30 branches in BiH,<sup>2101</sup> operating outside the official channels for the needs of the SMUP.<sup>2102</sup> Tajfun later became Sigma, and was incorporated by **SIMATOVIĆ** into the SerbianDB intelligence system in 1994.<sup>2103</sup> Reporting directly to **SIMATOVIĆ**, [REDACTED],<sup>2104</sup> and provided intelligence to, both Accused regarding the situation in the RS.<sup>2105</sup>

c. **STANIŠIĆ**, **SIMATOVIĆ**, and other JCE members used paramilitary and volunteer units linked to the SerbianDB to implement the CCP

<sup>2093</sup> [P02792](#), p.7(emphasis added).

<sup>2094</sup> [REDACTED].

<sup>2095</sup> [REDACTED]; [P00854](#), p.1; [REDACTED]; [REDACTED]; NIELSENChristian:T.99(23-Nov-2017); NIELSENChristian:[P00850](#), para.858; [P03506](#), p.8. *See also* BABIĆMilan:[P01246](#), T.13055-13056.

<sup>2096</sup> [REDACTED]; [P03513](#), p.4.

<sup>2097</sup> [REDACTED]. *See also* NIELSENChristian:[P00850](#), para.872; [P03501](#); [P03506](#), p.8; [P03507](#), p.1.

<sup>2098</sup> [REDACTED].

<sup>2099</sup> *See e.g.* [REDACTED]; [P03473](#); [P03481](#); [P03482](#); [P01713](#); [P03178](#). [REDACTED].

<sup>2100</sup> [P00853](#), p.1-2.

<sup>2101</sup> [1D00037](#), p.124.

<sup>2102</sup> DONIARobert:[P01597](#), p.86. *See also* [1D00081](#), p.114; [P02888](#), p.320; [P02896](#), p.30; NIELSENChristian:[P00850](#), para.909-920.

<sup>2103</sup> [P00860](#); [1D00037](#), p.136.

<sup>2104</sup> [P03513](#).

<sup>2105</sup> [P03509](#); [P03510](#); [P03512](#); [P03514](#); [P03515](#); [P03516](#); [P03517](#); [P03518](#); [P03519](#); NIELSENChristian:[P00850](#), para.916. **STANIŠIĆ**’s and/or **SIMATOVIĆ**’s initials at the top of the

494. Following consultations between Belgrade and BiH JCE members in the leadup to the conflict, the Accused deployed paramilitary units from Serbia to launch the conflict in BiH.<sup>2106</sup> The Accused sent ARKAN to eastern BiH and the Unit to Bosanski Šamac and Doboj,<sup>2107</sup> supported by Bosnian Serb fighters such as Ljubiša SAVIĆ aka MAUZER<sub>(DB)</sub>,<sup>2108</sup> who trained under ARKAN's SDG before establishing his own paramilitary unit,<sup>2109</sup> and recruited fighters from Serbia like Vojin VUČKOVIĆ aka ŽUĆA<sub>(DB)</sub>,<sup>2110</sup> who became the leader of the notorious Yellow Wasps in Zvornik.<sup>2111</sup>

495. In the absence of a Bosnian Serb army, Serbian paramilitaries (or “volunteer units”<sup>2112</sup>) controlled by or otherwise linked to the SMUP<sup>2113</sup> were a vital complement to the RS-MUP and newly-formed Bosnian Serb TO units in the earliest operations furthering the CCP in BiH. In short, JCE members needed the Serbian paramilitaries to advance the CCP, and allowed them to operate freely.<sup>2114</sup> [REDACTED].<sup>2115</sup> After the takeovers, however, the paramilitaries became a burden. The paramilitary ranks were full of criminals,<sup>2116</sup> who infiltrated police stations,<sup>2117</sup> exploited the lack of functioning law enforcement, began to harm the Serb population,<sup>2118</sup> and garnered unwanted international attention.<sup>2119</sup>

496. [REDACTED],<sup>2120</sup> [REDACTED].<sup>2121</sup> [REDACTED].<sup>2122</sup> [REDACTED].<sup>2123</sup> [REDACTED].<sup>2124</sup>

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reports indicate that they familiarised themselves with their contents. *See* MIĆIĆRadivoje:T.4(4-Mar-2020).

<sup>2106</sup> [REDACTED]; [P00004](#), p.29,31.

<sup>2107</sup> *Cross-reference* Section [II.D.2\(a\)\(iii\)](#); Section [II.D.2\(b\)\(iv\)](#).

<sup>2108</sup> [REDACTED].

<sup>2109</sup> [REDACTED].

<sup>2110</sup> [REDACTED]; [2D00121](#), p.1-2; [REDACTED]; THEUNENSReynaud:[P01980](#), p.466 .

<sup>2111</sup> [P01687](#), p.2.

<sup>2112</sup> *See* THEUNENSReynaud:[P01980](#), p.384,fn.150.

<sup>2113</sup> THEUNENSReynaud:[P01980](#), p.364-365,371,485-486.

<sup>2114</sup> *E.g.* [P02960](#), p.5,16; [REDACTED]. *Cross-reference* Section [II.F.4\(b\)\(ii\)a](#); Section [II.F.4\(b\)\(ii\)a.v](#); Section [II.F.4\(b\)\(ii\)b](#); Section [II.F.4\(b\)\(ii\)c.iii](#); Section [II.F.4\(b\)\(ii\)c.iv](#); Section [II.F.4\(b\)\(ii\)d](#); Section [II.F.4\(b\)\(iii\)a](#); Section [II.F.4\(b\)\(iii\)b](#); Section [III.C.1\(a\)-\(b\)](#); Section [III.C.2\(a\)-\(b\)](#); Section [III.C.3\(a\)-\(c\)](#); Section [III.C.4\(a\)-\(c\)](#); Section [III.C.5](#); Section [III.C.6\(a\)-\(d\)](#).

<sup>2115</sup> [REDACTED].

<sup>2116</sup> [2D00089](#), p.1-2,5-11. *See e.g.* [P03494](#).

<sup>2117</sup> [REDACTED]; [2D00089](#), p.2-3.

<sup>2118</sup> [2D00089](#), p.2-3; [REDACTED]. *See* [P03503](#), p.2.

<sup>2119</sup> [P02967](#), p.3-4.

<sup>2120</sup> [REDACTED].

<sup>2121</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)](#); Section [II.F.4\(b\)\(ii\)b](#).

<sup>2122</sup> [REDACTED].

<sup>2123</sup> [REDACTED].

d. Under MILOŠEVIĆ's direction, the JNA in BiH transformed into a Bosnian Serb army under MLADIĆ while Bosnian Serbs created a Serb TO

497. JNA units departing Croatia pursuant to the Vance Plan<sup>2125</sup> were relocated to Bosnian Serb-majority areas of BiH in early 1992.<sup>2126</sup> Anticipating that if the international community recognised BiH, the JNA would be seen as a foreign army and face demands that it withdraw, MILOŠEVIĆ suggested that JNA members originating from BiH be transferred to positions in BiH territory.<sup>2127</sup> This was largely accomplished by February 1992,<sup>2128</sup> at the same time that JNA forces in Croatia were secretly collaborating to militarise the Serb police there to evade the Vance Plan's demilitarisation requirements.<sup>2129</sup>

498. As BiH edged towards war that spring, the Bosnian Serb TO cooperated closely with the JNA,<sup>2130</sup> and Belgrade JCE members prepared to hand over the assets and personnel of the JNA units stationed in BiH, which ADŽIĆ estimated to be over 70% Bosnian Serb.<sup>2131</sup> JNA units participated in the Serb takeovers of Zvornik, Bosanski Šamac, Brčko, and Doboj<sup>2132</sup> and in combat operations alongside Bosnian Serb TO<sup>2133</sup> and police units in the Posavina Corridor.<sup>2134</sup>

499. At a meeting on 30 April 1992, MILOŠEVIĆ, KARADŽIĆ, KRAJIŠNIK, the SFRY Presidency, and JNA General Staff discussed the Security Council's recognition of BiH and its implications for the JNA's presence in BiH.<sup>2135</sup> They approved MLADIĆ—who by now had demonstrated his *bona fides* by committing widespread crimes in Croatia<sup>2136</sup>—to become Commander of the JNA 2<sup>nd</sup> Military District,<sup>2137</sup> which became the VRS once officially established at the RS Assembly session on 12 May 1992.<sup>2138</sup>

<sup>2124</sup> [REDACTED].

<sup>2125</sup> Cross-reference Section [II.F.3\(c\)](#).

<sup>2126</sup> THEUNENSReynaud:[P01980](#), p.350-351. See e.g. [P03345](#), p.6-7.

<sup>2127</sup> THEUNENSReynaud:[P01980](#), p.351-352.

<sup>2128</sup> [P03756](#). See AF520.

<sup>2129</sup> Cross-reference Section [II.F.3\(c\)](#).

<sup>2130</sup> THEUNENSReynaud:[P01980](#), p.381-382.

<sup>2131</sup> THEUNENSReynaud:[P01980](#), p.358-359,361-363; [P02932](#), p.3; [P03372](#), p.1-2; [P01737](#), p.6; [2D00844](#), p.2; [P03347](#); [P02966](#), p.5; [P03111](#), p.3,18-32.

<sup>2132</sup> Cross-reference Section [II.F.4.\(b\)\(i\)\(a\)-\(b\)](#); [II.F.4\(b\)\(ii\)a-c](#). THEUNENSReynaud:[P01980](#), p.359-360.

<sup>2133</sup> The TO was later integrated into the VRS: [P03112](#).

<sup>2134</sup> [2D00782](#); THEUNENSReynaud:[P01980](#), p.360.

<sup>2135</sup> [P02932](#), p.2-3; THEUNENSReynaud:[P01980](#), p.385-386.

<sup>2136</sup> [REDACTED]; BABIĆMilan:[P01244](#), para.15.

<sup>2137</sup> [P02932](#), p.2-3; THEUNENSReynaud:[P01980](#), p.353-354; [P03395](#), p.1; [P03396](#), p.1; [P03375](#), p.1; [P03376](#), p.1.

<sup>2138</sup> [P00068](#), p.69-70; THEUNENSReynaud:[P01980](#), p.386-387; [P03572](#).

MLADIĆ was appointed Commander of the VRS Main Staff at the same RS Assembly session,<sup>2139</sup> which was attended by MARTIĆ.<sup>2140</sup> MLADIĆ made clear that as VRS Commander he hoped to replicate the ruthless efficiency and JCE coordination that had swiftly displaced so many non-Serbs in Croatia: “[t]he Knin Corps was successful because under a single command in the zone of the corps were the JNA, the Territorial Defence forces, and MARTIĆ’s police; isn’t that right MARTIĆ?”<sup>2141</sup> Indeed, after the JNA’s ostensible withdrawal from BiH on 18 May 1992, the VRS continued to rely heavily on support from the FRY, Serbia, and the VJ—that is, on MILOŠEVIĆ, STANIŠIĆ, SIMATOVIĆ, and the Belgrade leadership<sup>2142</sup>—implementing the CCP in BiH for the remainder of the Indictment period.

e. KARADŽIĆ promulgated the Six Strategic Goals, publicly embracing the goal of ethnic separation already implemented in Croatia and BiH

500. By the 12 May 1992 RS Assembly session—the first since the war began—Serb Forces had already made significant territorial gains.<sup>2143</sup> At this session, the RS Assembly established the VRS with MLADIĆ as its commander, and KARADŽIĆ presented the RS leadership’s Six Strategic Goals.<sup>2144</sup>

501. The first and most overtly criminal Strategic Goal was to separate Serbs from the other two national communities.<sup>2145</sup> This goal was paramount,<sup>2146</sup> and the BiH JCE members knew it would involve entirely removing great swathes of the Muslim population.<sup>2147</sup> KARADŽIĆ referred not only to establishing a political and physical boundary, but also to economic, cultural, and other forms of separation.<sup>2148</sup>

502. The other strategic goals specified the territories where the First Strategic Goal should be implemented, calling for establishing a corridor between Semberija and Krajina, connecting RSK with Serbia (the Posavina Corridor);<sup>2149</sup> establishing a corridor

<sup>2139</sup> [P00068](#), p.69-70; [P01575](#), p.2; THEUNENSReynaud:[P01980](#), p.386.

<sup>2140</sup> DONIARobert:T.52(30-Jan-2018).

<sup>2141</sup> DONIARobert:[P01597](#), p.84; DONIARobert:T.51(30-Jan-2018).

<sup>2142</sup> THEUNENSReynaud:[P01980](#), p.363,388-399,415-416; [P03572](#), p.4; [P03122](#), p.1; [P03607](#), p.2; [P03616](#), p.10,25,28. *Cross-reference* Section [II.F.5\(a\)\(i\)-\(ii\)](#).

<sup>2143</sup> DONIARobert:[P01598](#), p.10-12; DONIARobert:T.37-38,43(30-Jan-2018). *See* AF853; AF854; AF859.

<sup>2144</sup> DONIARobert:[P01598](#), p.10; DONIARobert:T.37-38(30-Jan-2018); [P01591](#).

<sup>2145</sup> [P01591](#); DONIARobert:T.38(30-Jan-2018).

<sup>2146</sup> DONIARobert:[P01597](#), p.26; DONIARobert:T.45(30-Jan-2018).

<sup>2147</sup> DONIARobert:[P01598](#), p.11,13; DONIARobert:T.37(30-Jan-2018). *See* AF858; AF862.

<sup>2148</sup> DONIARobert:T.42,45-46(30-Jan-2018); DONIARobert:[P01597](#), p.24.

<sup>2149</sup> DONIARobert:[P01597](#), p.20,24-25; DONIARobert:T.44(30-Jan-2018); [P01592](#).

in the Drina Valley; establishing a border on the Una and Neretva rivers; dividing Sarajevo; and securing access to the sea.<sup>2150</sup> Together, the Six Strategic Goals provided a blueprint for separating the ethnic groups in BiH and thereby achieving the JCE goal of permanent removal of non-Serbs from the claimed Serb territory.<sup>2151</sup>

503. As described below, the takeovers that Serb Forces, including those supplied and controlled by the Accused, had already completed in furthering the CCP were perfectly aligned with the Six Strategic Goals.

(b) JCE members prepared separate structures in individual municipalities and used Serb Forces to attack non-Serb civilians from April 1992

504. With the Variant A/B Instructions as their blueprint, Serb leaders in targeted municipalities prepared their Serb Crisis Staffs and established and armed police and TO forces, with municipal police officials in a number of municipalities taking guidance directly from the Accused. Beginning in the spring of 1992, as BiH moved toward independence,<sup>2152</sup> **STANIŠIĆ, SIMATOVIĆ**, and other Belgrade JCE members joined with their co-JCE members in BiH—as they had done in Croatia<sup>2153</sup>—to ethnically cleanse Serb-claimed territories in BiH.<sup>2154</sup> Knowing that the same project in Croatia had resulted in widespread crimes,<sup>2155</sup> they deployed the Serb Forces they had established, armed, and trained to remove non-Serbs from Serb-claimed municipalities in BiH through a pattern of takeovers that mirrored the events in SAO-Krajina and SAO-SBWS.<sup>2156</sup> These forces murdered, persecuted, and forcibly displaced non-Serbs across BiH, which resulted in devastation and massive demographic change throughout the Drina River valley in eastern BiH, the northern Posavina Corridor, and the ARK in northwestern BiH by late summer 1992.<sup>2157</sup> The takeovers and crimes in Bijeljina and Zvornik supported the First, Second, and Third Strategic Goals.<sup>2158</sup> The takeovers and crimes in Bosanski Šamac and Doboj—as well those in Brčko and Teslić, and the second phase of the Koridor 92 operations—all demonstrate the pattern of criminality in

<sup>2150</sup> [P01591](#); DONIARobert:T.38-41(30-Jan-2018); [P01592](#).

<sup>2151</sup> THEUNENSReynaud:[P01980](#), p.369.

<sup>2152</sup> DONIARobert:T.25-26(30-Jan-2018); AF765.

<sup>2153</sup> Cross-reference Section [II.F.1](#); Section [II.F.2](#).

<sup>2154</sup> Cross-reference Section [II.F.4\(a\)\(ii\)c](#); [REDACTED].

<sup>2155</sup> Cross-reference Section [II.F.1](#); Section [II.F.2](#); Section [III.B](#).

<sup>2156</sup> See BABIĆMilan:[P01246](#), T.13064-13066,13081-13082. [REDACTED]; BABIĆMilan:[P01244](#), para.14; DERONJIĆMiroslav:[P01717](#), para.63; DERONJIĆMiroslav:[P01718](#), T.1016-1017.

<sup>2157</sup> BABIĆMilan:[P01246](#), T.13081-13082; [REDACTED].



achieving the First and Second Strategic Goals.<sup>2159</sup> That pattern continued in the takeovers and crimes aimed at driving the non-Serb population from Sanski Most, which implemented the First Strategic Goal.

(i) ARKAN's SDG and other forces from Serbia entered BiH to launch the conflict

505. At the beginning of April 1992, Serb Forces attacked and seized power in Bijeljina before proceeding to Muslim-majority Zvornik.<sup>2160</sup> Following a pattern which would be replicated across eastern BiH, paramilitaries such as ARKAN's SDG would arrive and begin to terrorise local Muslims by killing them and looting their property, causing them to flee.<sup>2161</sup> These takeovers were part of a design to drive Muslims away from the Drina and deeper into BiH, leaving the border between Serbia and BiH "completely clean".<sup>2162</sup>

a. Led by ARKAN, Serbs consolidated power in Bijeljina through violent crimes against non-Serbs

506. Bijeljina not only lay at the northern end of the Drina River valley which was largely Muslim below,<sup>2163</sup> but was also situated at the eastern end of the Posavina Corridor.<sup>2164</sup> Removing non-Serbs from Bijeljina thus created an anchor of Serb-claimed territory at the north-eastern border of BiH,<sup>2165</sup> a major step toward achieving what the Bosnian Serb leadership would soon publish as their First, Second, and Third Strategic Goals.<sup>2166</sup>

507. By February 1992, the SMUP was coordinating with Bijeljina through its Serb police chief, Predrag JEŠURIĆ<sub>(DB)</sub>.<sup>2167</sup> JEŠURIĆ<sub>(DB)</sub> had obtained and hidden weapons and "illegally armed Serbs" while preventing Bosnian Muslims from receiving

<sup>2158</sup> THEUNENSReynaud:[P01980](#), p.441,443-444,450-451.

<sup>2159</sup> THEUNENSReynaud:[P01980](#), p.467-468,490.

<sup>2160</sup> THEUNENSReynaud:[P01980](#), p.443-447,450-459. See AF931.

<sup>2161</sup> DERONJIĆMiroslav:[P01717](#), para.63; DERONJIĆMiroslav:[P01718](#), T.1016-1017; DERONJIĆMiroslav:[P01719](#), T.29626-29627,29633. See AF931; AF932.

<sup>2162</sup> [REDACTED].

<sup>2163</sup> DONIARobert:T.43-44(2-Feb-2018); [P01610](#).

<sup>2164</sup> [REDACTED]; DONIARobert:T.44(30-Jan-2018); [P01592](#); THEUNENSReynaud:T.33(15-Mar-2018); [P01980](#), p.444.

<sup>2165</sup> See AF930.

<sup>2166</sup> Cross-reference Section [II.F.4\(a\)\(ii\)c](#). [REDACTED].

<sup>2167</sup> [REDACTED]; [P03472](#), p.2; [P03476](#), p.2.

weapons.<sup>2168</sup> Bijeljina's Serb police station officially started operating on 1 April 1992,<sup>2169</sup> the day after MANDIĆ's memorandum announced the establishment of the separate RS-MUP.<sup>2170</sup>

508. Towards the end of March 1992, [REDACTED],<sup>2171</sup> ARKAN and numerous SDG members decamped from Erdut to island on the Drina in Popovi, just outside Bijeljina called "War Island".<sup>2172</sup> [REDACTED],<sup>2173</sup> [REDACTED].<sup>2174</sup> [REDACTED],<sup>2175</sup> [REDACTED].<sup>2176</sup> [REDACTED]

509. [REDACTED].<sup>2177</sup> During the night of 31 March to 1 April 1992, ARKAN led his SDG—in coordination with SRS volunteers, the local SDS volunteers trained at Popovi, and other Serb Forces such as the TO<sup>2178</sup>—in a brutal attack on Bijeljina, swiftly imposing Serb control, killing non-Serb civilians and looting their property, driving them out.<sup>2179</sup> On 4 April 1992 PLAVŠIĆ arrived with HADŽIĆ and a delegation of high-ranking BiH officials.<sup>2180</sup> Just days after international journalists photographed the SDG killing people in the streets,<sup>2181</sup> PLAVŠIĆ greeted ARKAN with a kiss and applauded his work.<sup>2182</sup> After about a week, ARKAN, MAUZER<sub>(DB)</sub>, and most of their units left Bijeljina for Zvornik,<sup>2183</sup> as had been previously planned.<sup>2184</sup>

510. After the Zvornik takeover, MAUZER<sub>(DB)</sub> returned to Bijeljina, where he became president of the Crisis Staff and founded his own unit,<sup>2185</sup> which—along with the newly-established Serb police—would terrorise the remaining Muslims over the following

<sup>2168</sup> [P03491](#), p.14.

<sup>2169</sup> [P03476](#), p.1.

<sup>2170</sup> [P03474](#). Cross-reference Section [II.F.4\(a\)\(ii\)b](#).

<sup>2171</sup> Cross-reference Section [II.D.2\(b\)\(iv\)](#). [REDACTED].

<sup>2172</sup> [REDACTED].

<sup>2173</sup> [REDACTED].

<sup>2174</sup> [REDACTED].

<sup>2175</sup> [REDACTED].

<sup>2176</sup> [REDACTED].

<sup>2177</sup> [REDACTED]. See also [REDACTED]. Cross-reference Section [II.D.2\(b\)\(iv\)](#).

<sup>2178</sup> [REDACTED]; THEUNENSReynaud:T.62(6-Mar-2018); [P01637](#), p.1-2; [ID00067](#), p.1-2. See also AF933.

<sup>2179</sup> Cross-reference Section [III.C.1\(a\)](#).

<sup>2180</sup> [P03352](#), p.1; [P02313](#).

<sup>2181</sup> [P03177](#), p.8.

<sup>2182</sup> [P02312](#); [P02956](#); MILOVANOVIĆManojlo:[P02934](#), T.4596. See AF947-AF948.

<sup>2183</sup> [REDACTED]. Some of ARKAN's SDG as well as other volunteers remained in Bijeljina until at least June 1992. [P03120](#).

<sup>2184</sup> Cross-reference Section [II.F.4\(b\)\(i\)](#).

<sup>2185</sup> [REDACTED].

months.<sup>2186</sup> [REDACTED],<sup>2187</sup> enabling the Accused to remain informed of developments in Bijeljina, and to influence those events through their powerful Bosnian Serb allies there.<sup>2188</sup>

b. After preparing Serb structures and forces, JCE members unleashed Serb Forces to attack Zvornik and its non-Serbs

511. The Serb Forces' cleansing campaign intensified as the international community recognised BiH independence on 6 April 1992.<sup>2189</sup> On 8 April the SDG, JNA, SRS, and other Serb Forces violently attacked Zvornik, torturing and killing many in their homes or in makeshift detention centres. SerbianDB asset and Zvornik TO commander Marko PAVLOVIĆ<sub>(DB)</sub> subsequently organised mass deportations with local SDS leaders, removing hundreds of non-Serb civilians from Zvornik in the following months. Captain DRAGAN<sub>(DB)</sub> established a SerbianDB camp in Divič where he and Unit members detained, raped, abused and killed or expelled non-Serbs. The Zvornik takeover and crimes<sup>2190</sup> furthered the First, Second, and Third Strategic Goals.<sup>2191</sup>

i. KOSTIĆ<sub>(DB)</sub> and PAVLOVIĆ<sub>(DB)</sub> armed Serbs in Zvornik

512. Weapons for arming the Serb population began to arrive in Zvornik during the course of 1991. [REDACTED]<sup>2192</sup> [REDACTED] SerbianDB associates KOSTIĆ<sub>(DB)</sub>, Marko PAVLOVIĆ<sub>(DB)</sub>,<sup>2193</sup> and [REDACTED] continued to facilitate the inflow and distribution of weapons in Zvornik through the Zvornik SDS throughout 1991 until Serb Forces attacked in April 1992.<sup>2194</sup>

513. At the end of 1991, KOSTIĆ<sub>(DB)</sub>, then based in Baranja in SBWS,<sup>2195</sup> brought [REDACTED], PAVLOVIĆ<sub>(DB)</sub>, to the Zvornik area [REDACTED].<sup>2196</sup> [REDACTED].<sup>2197</sup> [REDACTED],<sup>2198</sup> over the next months, PAVLOVIĆ<sub>(DB)</sub> was in

<sup>2186</sup> Cross-reference Section [III.C.1\(b\)](#).

<sup>2187</sup> [REDACTED].

<sup>2188</sup> [1D00036](#), p.76-82; [REDACTED].

<sup>2189</sup> See AF531; AF766.

<sup>2190</sup> See AF974; [REDACTED].

<sup>2191</sup> THEUNENSReynaud:[P01980](#), p.451.

<sup>2192</sup> Cross-reference Section [II.E.3\(a\)\(iv\)c](#).

<sup>2193</sup> Cross-reference Section [II.D.1\(c\)](#).

<sup>2194</sup> Cross-reference Section [II.E.3\(a\)\(iv\)c](#).

<sup>2195</sup> Cross-reference Section [II.F.2\(d\)\(iii\)](#).

<sup>2196</sup> [REDACTED]. See also [REDACTED]; [P00837](#), p.2.

<sup>2197</sup> [REDACTED].

frequent contact with [REDACTED] high-ranking members of the JNA,<sup>2199</sup> using these contacts to procure weapons for local Serbs.<sup>2200</sup> PAVLOVIĆ<sub>(DB)</sub> received [REDACTED] weapons [REDACTED],<sup>2201</sup> which he distributed freely to volunteers in Zvornik.<sup>2202</sup>

ii. The Zvornik SDS prepared separate forces and political structures

514. When the Variant A/B Instructions were issued in December 1991,<sup>2203</sup> members of the Zvornik SDS moved quickly to implement Variant B in Muslim-majority Zvornik.<sup>2204</sup> Within three days, the Zvornik SDS Municipal Board established the prescribed separate Serb government structures, electing a Crisis Staff with Branko GRUJIĆ as its commander, and proclaiming that a session of the municipal Serb Assembly would be held five days later.<sup>2205</sup> On 27 December 1991, the Assembly announced the establishment of the “Serbian Municipality of Zvornik”.<sup>2206</sup>

515. In March 1992, the Zvornik SDS Municipal Board took a further step towards implementing Variant B: erecting barricades between Karakaj—a Serb-majority area—and Zvornik town, which remained majority-Muslim.<sup>2207</sup> The Municipal Board also implemented measures marginalising non-Serbs.<sup>2208</sup> For example, Serbs were forbidden from trading real estate to non-Serbs,<sup>2209</sup> and the pensions of non-Serbs were withheld.<sup>2210</sup> [REDACTED].<sup>2211</sup>

516. In early April, days after receiving the MANDIĆ Memorandum,<sup>2212</sup> the Crisis Staff officially formed a Zvornik branch of the RS-MUP.<sup>2213</sup> The Serb members of the multi-ethnic Zvornik SJB then left their posts,<sup>2214</sup> establishing premises at the Alhos

<sup>2198</sup> [REDACTED].

<sup>2199</sup> [REDACTED]; OFS-23:T.11(15-Sep-2020); [REDACTED].

<sup>2200</sup> [REDACTED].

<sup>2201</sup> [REDACTED].

<sup>2202</sup> [REDACTED]; [P01687](#), p.1-2.

<sup>2203</sup> Cross-reference Section [II.F.4\(a\)\(ii\)a](#).

<sup>2204</sup> [REDACTED].

<sup>2205</sup> [P03550](#), p.1-2; [REDACTED].

<sup>2206</sup> [P03174](#).

<sup>2207</sup> [REDACTED].

<sup>2208</sup> [REDACTED].

<sup>2209</sup> [P01644](#); [REDACTED].

<sup>2210</sup> [P03121](#); [REDACTED].

<sup>2211</sup> [REDACTED].

<sup>2212</sup> Cross-reference Section [II.F.4\(a\)\(ii\)b.i](#).

<sup>2213</sup> [REDACTED]; [P03504](#), p.5; [P03545](#), p.2; [REDACTED].

<sup>2214</sup> MUJIĆFadil:[P01683](#), para.24; [REDACTED]. See AF986.

Factory in Karakaj on 5 April 1992.<sup>2215</sup> The new RS-MUP members appropriated the Zvornik SJB's weapons, vehicles, and communications equipment as they departed,<sup>2216</sup> and obtained equipment and supplies from the SMUP.<sup>2217</sup>

517. On 6 April 1992, the Crisis Staff declared a state of war in Zvornik, delegating public and state security duties to the Serb police and defence duties to the Zvornik TO and part of the reserve police.<sup>2218</sup>

iii. Serb Forces under ARKAN attacked non-Serbs in Zvornik

518. As in Bijeljina, the SerbianDB orchestrated the attack on Zvornik,[REDACTED].<sup>2219</sup> SerbianDB operative KOSTIĆ<sub>(DB)</sub> had set the stage for the Zvornik attack several months earlier, installing PAVLOVIĆ<sub>(DB)</sub> in Mali Zvornik, just across the river in Serbia.<sup>2220</sup> [REDACTED]<sup>2221</sup> [REDACTED], KOSTIĆ<sub>(DB)</sub> and PLAVŠIĆ arranged [REDACTED]<sup>2222</sup> [REDACTED] to bring ARKAN and the SDG from Bijeljina to Zvornik<sup>2223</sup> on the day the Zvornik Crisis Staff declared a state of war.<sup>2224</sup> The SDG joined the Crisis Staff in establishing ARKAN's base in the Alhos Factory, alongside JNA units and Serb paramilitaries<sup>2225</sup> [REDACTED].<sup>2226</sup>

519. PAVLOVIĆ<sub>(DB)</sub> had already been meeting paramilitaries such as Vojin VUČKOVIĆ aka ŽUĆA<sub>(DB)</sub>, [REDACTED],<sup>2227</sup> recruiting them to assist in a forthcoming action in Zvornik.<sup>2228</sup> PAVLOVIĆ<sub>(DB)</sub> ensured that the arriving paramilitaries and volunteers had weapons and accommodation ahead of the takeover.<sup>2229</sup> Working with the Crisis Staff, ARKAN conscripted Serb civilians at gunpoint and

<sup>2215</sup> MUJIĆFadil:[P01683](#), para.24; [REDACTED]; [P01825](#).

<sup>2216</sup> MUJIĆFadil:[P01683](#), para.24; [REDACTED]. See AF986.

<sup>2217</sup> [P03485](#).

<sup>2218</sup> [P03558](#). See also AF987.

<sup>2219</sup> [P00004](#), p.29,31; [REDACTED].

<sup>2220</sup> Cross-reference Section II F.4(b)(i)b.i.

<sup>2221</sup> [REDACTED].

<sup>2222</sup> [REDACTED].

<sup>2223</sup> OFS-23:T.23,25-26(15-Sep-2020); [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>2224</sup> [REDACTED]; MUJIĆFadil:[P01683](#), para.5,20.

<sup>2225</sup> MUJIĆFadil:T.8-9(27-Feb-2018); MUJIĆFadil:[P01683](#), para.24,25; [REDACTED]. Some paramilitaries were bused in from Belgrade. [P03116](#).

<sup>2226</sup> [REDACTED].

<sup>2227</sup> [REDACTED].

<sup>2228</sup> [2D00122](#); [2D00121](#), p.1-2; [REDACTED]. See also [P03281](#), p.2; AF1031.

<sup>2229</sup> [REDACTED]; [P01687](#), p.1-2.

ordered them to collect the bodies that were expected as a result of the impending attack.<sup>2230</sup>

520. The next day, the international community moved to recognise the independence of BiH.<sup>2231</sup> That day, ARKAN led a delegation of Zvornik's Serb leaders at a meeting with JNA officials and Zvornik's Muslim representatives<sup>2232</sup> at the Hotel Jezero,<sup>2233</sup> [REDACTED] in Mali Zvornik.<sup>2234</sup> ARKAN gave the Muslim representatives an ultimatum: surrender all weapons and the town within one hour, or Serb Forces would attack Zvornik.<sup>2235</sup>

521. That night, PAVLOVIĆ<sub>(DB)</sub>'s close SerbianDB connection and power in the municipality was evident when he and *vojna linija* member General BOŠKOVIĆ, who owed his position to STANIŠIĆ,<sup>2236</sup> secured the release of LEGIJA<sub>(DB)</sub>,<sup>2237</sup> and [REDACTED]<sup>2238</sup>—whom Zvornik's Muslim police force had arrested at a checkpoint carrying automatic weapons, knives, and strangle wire.<sup>2239</sup> ŽUĆA<sub>(DB)</sub><sup>2240</sup> [REDACTED]<sup>2241</sup> before reporting to PAVLOVIĆ<sub>(DB)</sub> in Zvornik.<sup>2242</sup>

522. [REDACTED].<sup>2243</sup> ARKAN ordered the attack on Zvornik in the early morning hours of 8 April; within 24 hours, Serb Forces had taken over the town.<sup>2244</sup> The Serb Forces committed widespread vicious crimes, murdering many non-Serbs while taking Zvornik.<sup>2245</sup>

<sup>2230</sup> [REDACTED]; [REDACTED];[REDACTED]; OFS-23:T.48(17-Sep-2020); [P01821](#)(00:21:15-00:22:13).

<sup>2231</sup> DONIARobert:T.26(30-Jan-2018).

<sup>2232</sup> MUJIĆFadil:T.44-45(27-Feb-2018); [2D00154](#); [REDACTED]. See AF988.

<sup>2233</sup> THEUNENSReynaud:T.85(21-Mar-2018); MUJIĆFadil:[P01683](#), para.28-29.

<sup>2234</sup> [REDACTED].

<sup>2235</sup> MUJIĆFadil:[P01683](#), para.29; MUJIĆFadil:T.45(27-Feb-2018); [2D00154](#); [REDACTED]; [2D00152](#)(01:29:39-01:34:28), p.13.

<sup>2236</sup> Cross-reference Section [II.E.1\(c\)](#).

<sup>2237</sup> Cross-reference Section [II.D.2\(b\)\(i\)](#).

<sup>2238</sup> Cross-reference Section [II.F.4\(a\)\(ii\)c](#).

<sup>2239</sup> MUJIĆFadil:[P01683](#), para.30,32-34; MUJIĆFadil:[P01684](#), para.2,5,7-8; MUJIĆFadil:T.42-43,50(27-Feb-2018); [REDACTED]; [P03281](#), p.1-2; [P01687](#), p.1-2.

<sup>2240</sup> [REDACTED]; OFS-23:T.41(15-Sep-2020).

<sup>2241</sup> [REDACTED]. See also [REDACTED].

<sup>2242</sup> [REDACTED]; [P01687](#), p.1-2; [2D00121](#), p.1-2; [2D00122](#); [REDACTED].

<sup>2243</sup> [REDACTED].

<sup>2244</sup> Cross-reference Section [III.C.2\(a\)](#).

<sup>2245</sup> Cross-reference Section [III.C.2\(a\)](#).

iv. The ethnic cleansing campaign continued under PAVLOVIĆ<sub>(DB)</sub>

523. After the takeover, the Crisis Staff established an interim government,<sup>2246</sup> as the TO and Serb volunteers “mopped up two thirds of Zvornik and pushed on along the Drina river towards Divič village”.<sup>2247</sup> ARKAN left the area, safe in the knowledge that “Serbs [were] in control of Zvornik”.<sup>2248</sup>

524. All volunteers and paramilitaries were consolidated under the command of Marko PAVLOVIĆ<sub>(DB)</sub>, who GRUJIĆ officially appointed as Zvornik TO commander on 28 April 1992.<sup>2249</sup> [REDACTED].<sup>2250</sup>

525. Throughout the period following the takeover, PAVLOVIĆ<sub>(DB)</sub> coordinated and commanded all Serb Forces operating in Zvornik,<sup>2251</sup> including the Yellow Wasps,<sup>2252</sup> who detained and killed hundreds of Muslims at the Karakaj technical school and mutilated, sexually abused, and killed Muslims detained at other locations throughout the municipality.<sup>2253</sup> PAVLOVIĆ<sub>(DB)</sub> and other BiH Serb municipal representatives also met with SIMATOVIĆ during this time to coordinate SerbianDB force allocations and facilities.<sup>2254</sup>

526. In the weeks following the Serb takeover of Zvornik, Serb Forces under PAVLOVIĆ<sub>(DB)</sub> successively took control of nearby unarmed Muslim villages, including Divič and Kozluk, arresting, detaining, and killing many, and bussing several groups to Muslim-held territory<sup>2255</sup> or into Serbia, where the SMUP transferred them to a camp in northern Serbia.<sup>2256</sup> PAVLOVIĆ<sub>(DB)</sub> permitted the paramilitaries to flourish, paying them despite the fact that they committed crimes.<sup>2257</sup> By June 1992, Captain DRAGAN<sub>(DB)</sub> and Unit members from Knin had established a training camp in newly cleansed Divič to

<sup>2246</sup> [P03559](#), p.2-5; [REDACTED].

<sup>2247</sup> [P03360](#), p.6.

<sup>2248</sup> [P02794](#), p.4-5.

<sup>2249</sup> [P03564](#); [P03565](#), p.2; [REDACTED]; [REDACTED]; [P01687](#), p.2; [P01686](#), p.1. PAVLOVIĆ<sub>(DB)</sub> was also a member of the War Staff and later Commander of the Military Territorial Command. [P03567](#); [P03573](#); [REDACTED]. See also [P03150](#).

<sup>2250</sup> [REDACTED].

<sup>2251</sup> [REDACTED]. See also [P03146](#); [P03148](#); cross-reference AnnexA.

<sup>2252</sup> [P01687](#), p.2-3.

<sup>2253</sup> Cross-reference Section [III.C.2\(b\)](#).

<sup>2254</sup> DERONJIĆ Miroslav: [P01717](#), para.134-138.

<sup>2255</sup> Cross-reference Section [III.C.2\(b\)](#).

<sup>2256</sup> Cross-reference Section [III.C.2\(b\)](#).

<sup>2257</sup> [REDACTED]; [P03596](#), p.1-2; [P03579](#); cross-reference AnnexA.



train “criminally-inclined” recruits and members of the VRS.<sup>2258</sup> The training involved using captured Muslims for live target practice, forcing them to move upstream while trainees shot at them.<sup>2259</sup> Under Captain DRAGAN<sub>(DB)</sub>, Unit members engaged in acts of mistreatment, killing, terrorising, raping, and looting.<sup>2260</sup>

527. At the end of June, local Serb authorities touted their success at a meeting of Zvornik municipality representatives that both KARADŽIĆ and MLADIĆ attended. Branko GRUJIĆ reported that “we have successfully implemented the President’s decision to settle Divič and Kozluk with our children”.<sup>2261</sup> Noting the “exceptional success” of ARKAN’s and ŠEŠELJ’s units in Zvornik,<sup>2262</sup> PAVLOVIĆ<sub>(DB)</sub> added that “we were most active in evicting the Muslims” from Kozluk, Divič, and other locations.<sup>2263</sup>

v. The Accused attempted to cover up the Yellow Wasps’ crimes [REDACTED]

528. The SerbianDB was well aware of the crimes and who committed them during and after the attack on Zvornik,<sup>2264</sup> [REDACTED].<sup>2265</sup> [REDACTED].<sup>2266</sup>

529. [REDACTED].<sup>2267</sup> Since the Yellow Wasps’ killings at Čelopek had become well-known,<sup>2268</sup> [REDACTED],<sup>2269</sup> [REDACTED].<sup>2270</sup>

530. [REDACTED].<sup>2271</sup> [REDACTED].<sup>2272</sup> [REDACTED].<sup>2273</sup> [REDACTED].<sup>2274</sup>

<sup>2258</sup> Cross-reference Section [II.E.4\(d\)\(i\)](#).

<sup>2259</sup> [REDACTED].

<sup>2260</sup> [REDACTED]; [2D00083](#), p.3,5; [REDACTED]; [P02888](#), p.250,252,264; [P01643](#), p.1; [REDACTED].

<sup>2261</sup> [P02888](#), p.249-250; [P01690](#), p.4-5.

<sup>2262</sup> [P02888](#), p.250-252; [P01690](#), p.5-7.

<sup>2263</sup> [P02888](#), p.253-254; [P01690](#), p.8-9.

<sup>2264</sup> [REDACTED].

<sup>2265</sup> [REDACTED].

<sup>2266</sup> [REDACTED]. See AnnexF.

<sup>2267</sup> [REDACTED]. Cross-reference Section [II.F.4\(a\)\(ii\)c](#).

<sup>2268</sup> Cross-reference Section [III.C\(2\)\(b\)](#).

<sup>2269</sup> [REDACTED].

<sup>2270</sup> [REDACTED].

<sup>2271</sup> [REDACTED].

<sup>2272</sup> [REDACTED].

<sup>2273</sup> [REDACTED].

<sup>2274</sup> [REDACTED].

(ii) The Unit and other Serb Forces eradicated non-Serbs from Posavina Corridor municipalities

531. After Zvornik, JCE members launched a series of operations targeting municipalities along the Posavina Corridor, which stretched across northern BiH, linking the Croatian and Bosnian Krajinas with Serbia and furthering the First and Second Strategic Goals.<sup>2275</sup> This corridor comprised a substantial number of municipalities that had either a Bosnian Muslim or Croat absolute or relative majority,<sup>2276</sup> requiring JCE members to remove huge portions of the population to achieve their goal.

532. Bosnian Serbs in some municipalities along the Posavina Corridor, including those in Bosanski Šamac and Doboj, joined the SAO of Northern Bosnia at the end of 1991.<sup>2277</sup> The objective in creating the SAO Northern Bosnia, which was overwhelmingly non-Serb in population, was not lost on members of the international community.<sup>2278</sup> The SerbianDB ensured Bosnian Serbs in this region were armed by sending weapons through the Accused's assets Predrag RADULOVIĆ<sub>(DB)</sub> and the "Miloš" group, which were then distributed along the Posavina Corridor.<sup>2279</sup> When the JNA withdrew from Croatia, they too brought artillery and troops to BiH,<sup>2280</sup> establishing the 17<sup>th</sup> Tactical Group ("TG-17"), headquartered in Pelagićevo, the area's "Chetnik" headquarters during World War II.<sup>2281</sup> The Pelagićevo headquarters established new JNA units in each of its municipalities—including Bosanski Šamac and Brčko—and drafted all eligible Serb males.<sup>2282</sup> Another headquarters established in Doboj covered the remaining Posavina municipalities.<sup>2283</sup>

533. Beginning in March 1992, the JNA secured major logistics and communication lines in the region, as well as the main entry points into BiH.<sup>2284</sup> **SIMATOVIĆ** then deployed part of the Unit to Bosanski Šamac from Pajzoš,<sup>2285</sup> while other Unit

<sup>2275</sup> Cross-reference Section [II.F.4\(a\)\(ii\)c](#); DONIARobert:[P01597](#), p.20,24; DONIARobert:T.46(30-Jan-2018); DONIARobert:T.45(2-Feb-2018); THEUNENSReynaud:[P01980](#), p.513; WILSONJohn:T.13(27-Jun-2017); ĐUKIĆPetar:T.6(17-Dec-19).

<sup>2276</sup> DONIARobert:T.45(2-Feb-2018); [P02014](#), p.1-2.

<sup>2277</sup> THEUNENSReynaud:[P01980](#), p.373-374; [REDACTED].

<sup>2278</sup> [REDACTED].

<sup>2279</sup> Cross-reference Section [II.E.3\(a\)\(iv\)c](#).

<sup>2280</sup> LUKAČDragan:[P02731](#), p.6; TIHIĆSulejman:[P01865](#), p.3; [REDACTED].

<sup>2281</sup> LUKAČDragan:[P02731](#), p.7.

<sup>2282</sup> LUKAČDragan:[P02731](#), p.7; LUKAČDragan:[P02732](#), T.1890,1892.

<sup>2283</sup> LUKAČDragan:[P02731](#), p.7.

<sup>2284</sup> See AF776.

<sup>2285</sup> Cross-reference Section [II.F.4\(b\)\(ii\)a.iv](#).

contingents went to Doboj<sup>2286</sup> and Brčko.<sup>2287</sup> Serb Forces took over those municipalities and expelled the non-Serb populations in furtherance of the First and Second Strategic Goals.<sup>2288</sup> To fully open the corridor, after a Bosnian Muslim and Croat counter-offensive blocked the road,<sup>2289</sup> Unit members also assisted the VRS in Operation Koridor 92.<sup>2290</sup>

a. The Unit and other Serb Forces took over Bosanski Šamac

534. Bosanski Šamac lay on the only ground route between the RSK and the majority-Serb municipalities to its west, around Banja Luka.<sup>2291</sup> To secure control over this predominantly non-Serb municipality, **SIMATOVIĆ** deployed the Unit, which, alongside other Serb Forces, forcibly displaced thousands of non-Serbs.<sup>2292</sup>

i. The JNA established its 4<sup>th</sup> Detachment as a Serb force in Bosanski Šamac

535. In 1991, the JNA began to create, train, and arm new units in the municipality's Serb villages and removed weaponry from the multi-ethnic Bosanski Šamac TO to the JNA garrison in Derventa in order to disarm non-Serbs.<sup>2293</sup> Shortly after its secret establishment in January 1992,<sup>2294</sup> the predominantly-Serb JNA 4<sup>th</sup> Detachment erected checkpoints,<sup>2295</sup> recruited and armed approximately 500 Serb soldiers, and established a command structure.<sup>2296</sup> The 4<sup>th</sup> Detachment became openly operational over the next two months.<sup>2297</sup>

ii. The Unit trained Bosanski Šamac locals at Pajzoš

536. By March 1992, the SerbianDB was working with Bosanski Šamac's Serb authorities. Following a meeting in Belgrade with SerbianDB representatives, including Milenko PRODANIĆ<sub>(DB)</sub> (**STANIŠIĆ**'s SerbianDB official for personnel and

<sup>2286</sup> Cross-reference Section [II.F.4\(b\)\(ii\)c.ii-iii.](#)

<sup>2287</sup> Cross-reference Section [II.F.4\(b\)\(ii\)b.](#)

<sup>2288</sup> THEUNENSReynaud:[P01980](#), p.467-468,483-484,490; TIHIĆSulejman:[P01866](#), p.3; [REDACTED]; [1D00034](#), p.1-2; [REDACTED]; HADŽOVIĆEdin:[P02011](#), T.2220-2221; HADŽOVIĆEdin:[P02009](#), p.3; [P02014](#). See AF879; AF1040-AF1041; AF1147.

<sup>2289</sup> See AF873.

<sup>2290</sup> Cross-reference Section [II.F.4\(b\)\(ii\)d.](#)

<sup>2291</sup> [P01926](#); [REDACTED]; TIHIĆSulejman:[P01866](#), p.3; [REDACTED]. See AF1040-AF1041.

<sup>2292</sup> Cross-reference Section [III.C.3.](#)

<sup>2293</sup> LUKAČDragan:[P02731](#), p.7-8,12; LUKAČDragan:[P02732](#), T.1558.

<sup>2294</sup> LUKAČDragan:[P02731](#), p.12; LUKAČDragan:[P02732](#), T.1893.

<sup>2295</sup> LUKAČDragan:[P02731](#), p.12; LUKAČDragan:[P02732](#), T.1559-1560,1566-1569,1909; [P01852](#).

<sup>2296</sup> LUKAČDragan:[P02731](#), p.13; LUKAČDragan:[P02732](#), T.1564; [REDACTED].

resources),<sup>2298</sup> SDS official<sup>2299</sup> Stevan TODOROVIĆ and top municipal defence official Miloš BOGDANOVIĆ returned to Bosanski Šamac and selected 20 men to undergo military training at the SerbianDB's Pajzoš camp.<sup>2300</sup> Veteran Unit members trained the Bosanski Šamac men prior to their deployment to Bosanski Šamac.<sup>2301</sup>

iii. The Bosanski Šamac SDS established separate Serb government and police structures

537. In preparation for the upcoming Serb takeover,<sup>2302</sup> the SDS had first established a Serb Municipality of Bosanski Šamac in February 1992,<sup>2303</sup> following the promulgation of KARADŽIĆ's Variant A/B Instructions<sup>2304</sup>—Bosanski Šamac being a Variant B (non-Serb majority) municipality.<sup>2305</sup> The Bosanski Šamac Crisis Staff—established pursuant to the Variant A/B Instructions<sup>2306</sup> and headed by SIMIĆ<sup>2307</sup>—would spring to action immediately following the Serb takeover in mid-April 1992, issuing orders to appropriate property and detain all Croats.<sup>2308</sup>

538. Encouraged by the SDS and JNA, Serb reserve police members stopped reporting for duty but did not return their weapons.<sup>2309</sup> TODOROVIĆ became SJB chief on 28 March.<sup>2310</sup> Within ten days of receiving the MANDIĆ Memorandum, Bosanski Šamac's Serb police force was operational.<sup>2311</sup>

539. On 13 April 1992, municipal SDS President Blagoje SIMIĆ—KARADŽIĆ's "person number one" in the Posavina region<sup>2312</sup>—called a meeting to announce that a Serb municipality of Bosanski Šamac was being established, meaning that 9,500 Croats

<sup>2297</sup> LUKAČDragan:[P02731](#), p.13.

<sup>2298</sup> [REDACTED].

<sup>2299</sup> LUKAČDragan:[P02731](#), p.25.

<sup>2300</sup> [REDACTED].

<sup>2301</sup> *Cross-reference* Section [II.E.4\(b\)\(iii\)](#).

<sup>2302</sup> LUKAČDragan:[P02731](#), p.10.

<sup>2303</sup> [P01873](#); [P01874](#), p.2; [REDACTED]. *See* AF1067-AF1068.

<sup>2304</sup> *Cross-reference* Section [II.F.4\(a\)\(ii\)](#).

<sup>2305</sup> TIHIĆSulejman:[P01866](#), p.3.

<sup>2306</sup> DONIARobert:T.49(30-Jan-2018).

<sup>2307</sup> [P03561](#).

<sup>2308</sup> *Cross-reference* Section [III.C.3\(b\)](#).

<sup>2309</sup> LUKAČDragan:[P02731](#), p.15; LUKAČDragan:[P02732](#), T.1570-1572,1856-1858.

<sup>2310</sup> [P01874](#), p.12-13; LUKAČDragan:[P02732](#), T.1611; [REDACTED].

<sup>2311</sup> *Cross-reference* Section [II.F.4\(a\)\(ii\)b](#). LUKAČDragan:[P02731](#), p.15; [REDACTED]; TIHIĆSulejman:[P01865](#), p.4; [P01874](#), p.21.

<sup>2312</sup> [REDACTED]; ĐUKIĆPetar:T.22-23(16-Dec-2019).

and 2,500 Muslims would be displaced from Serb-claimed villages.<sup>2313</sup> SIMIĆ gave Croat representatives seven days to respond.<sup>2314</sup> The JNA's presence at the meeting signalled that force would be used to ensure Serb control over the municipality.<sup>2315</sup> SIMIĆ became President of the Crisis Staff upon its establishment two days later, and President of the Serb municipality two days after that.<sup>2316</sup> A separate Serb TO was also established prior to the takeover.<sup>2317</sup>

iv. SIMATOVIĆ deployed the Unit and Pajzoš-trained Red Berets under its command to take over Bosanski Šamac

540. On 11 April 1992, having briefed the group on their objectives, **SIMATOVIĆ** deployed Unit members and Pajzoš-trained Bosanski Šamac locals under the command of veteran Unit member Dragan ĐORĐEVIĆ aka CRNI<sub>(DB)</sub><sup>2318</sup> to Batkuša near Bosanski Šamac<sup>2319</sup> in JNA helicopters.<sup>2320</sup> [REDACTED].<sup>2321</sup> To conceal the SerbianDB's participation in the operation, Unit members were ordered to [REDACTED] and deploy into BiH without any personal identification.<sup>2322</sup> TG-17 Commander NIKOLIĆ aka KRIGER<sup>2323</sup> [REDACTED].<sup>2324</sup>

541. Once in Bosanski Šamac, CRNI<sub>(DB)</sub> met with local civilian, police, and military authorities—including SIMIĆ,<sup>2325</sup> NIKOLIĆ, TODORVIĆ, and BOGDANOVIĆ—to plan the takeover,<sup>2326</sup> agreeing that the Red Berets would remain under CRNI's<sub>(DB)</sub>

<sup>2313</sup> LUKAČDragan:[P02731](#), p.16-17; LUKAČDragan:[P02732](#), T.1637; [REDACTED]; TIHIĆSulejman:[P01866](#), p.3; [REDACTED].

<sup>2314</sup> LUKAČDragan:[P02731](#), p.16-17; LUKAČDragan:[P02732](#), T.1637.

<sup>2315</sup> TIHIĆSulejman:[P01866](#), p.3; [REDACTED].

<sup>2316</sup> [P01874](#), p.2; [P03368/P02037](#) (duplicates); [REDACTED]; [P03561](#); [REDACTED]. See AF1074.

<sup>2317</sup> [P03368](#); [REDACTED].

<sup>2318</sup> [REDACTED]; LUKAČDragan:[P02732](#), T.1678; [P00845](#), p.20.

<sup>2319</sup> [REDACTED].

<sup>2320</sup> [REDACTED]; TIHIĆSulejman:[P01865](#), p.6; [REDACTED]; [REDACTED]; LUKAČDragan:[P02731](#), p.17; LUKAČDragan:[P02732](#), T.1612,1614,1678; [P02040](#); [REDACTED]; [P00846](#), p.3; [P01953](#), p.2. See AF1059.

<sup>2321</sup> [REDACTED].

<sup>2322</sup> [REDACTED].

<sup>2323</sup> See AF1053-AF1055.

<sup>2324</sup> [REDACTED].

<sup>2325</sup> LUKAČDragan:[P02732](#), T.1637. See also AF1060-1061.

<sup>2326</sup> [REDACTED]. See AF1060-AF1062.

command while re-subordinating to the JNA TG-17 for the takeover operation.<sup>2327</sup> CRNI<sub>(DB)</sub>, in turn, reported directly to **SIMATOVIĆ**.<sup>2328</sup>

v. Serb Forces under CRNI<sub>(DB)</sub> attacked Bosanski Šamac

542. During the night between 16 and 17 April, forces of the Serb TO, RS-MUP, and TG-17 seized control of key facilities within Bosanski Šamac town without significant resistance.<sup>2329</sup> **SIMATOVIĆ**'s Red Berets "played a significant role" in the takeover of Bosanski Šamac,<sup>2330</sup> and throughout the operation, received orders from CRNI<sub>(DB)</sub> and his deputy, Srećko RADOVANOVIĆ aka DEBELI<sub>(DB)</sub>.<sup>2331</sup> Immediately after the takeover, the JNA relieved the Unit members of positions they had secured in town.<sup>2332</sup> Red Berets then demanded that the population surrender any firearms, and joined other Serb Forces in sweeping the town, removing all weapons, rounding up non-Serb civilians and detaining them in the SJB building and other makeshift jails.<sup>2333</sup> Within a few days the newly-established SDS Crisis Staff<sup>2334</sup> and Serb Forces controlled most of the municipality.<sup>2335</sup>

543. During the takeover and ensuing wave of crimes, Unit members, Pajzoš-trained Red Berets, and other Serb Forces killed, terrorised, and forcibly removed non-Serbs from Bosanski Šamac.<sup>2336</sup> The Unit's crimes included the massacre of non-Serbs they had detained at the Crkvina warehouse.<sup>2337</sup>

544. On 19 May 1992, with the JNA giving way to the VRS in BiH, CRNI<sub>(DB)</sub>'s mixed unit was incorporated into the VRS 2<sup>nd</sup> Posavina Brigade, CRNI<sub>(DB)</sub> was appointed commander,<sup>2338</sup> and DEBELI<sub>(DB)</sub> was made chief of staff,<sup>2339</sup> while remaining members

<sup>2327</sup> [REDACTED]; [P02048](#); [REDACTED].

<sup>2328</sup> [REDACTED].

<sup>2329</sup> [REDACTED]; [P03368/P02037](#)(duplicates); [P02040](#); [REDACTED]; [P01879](#); [P01953](#), p.2; LUKAČDragan:[P02731](#), p.20; LUKAČDragan:[P02732](#), T.1666-1667; [REDACTED]; [P02736](#). See AF1084; AF1087-AF1088; AF778; AF911.

<sup>2330</sup> [REDACTED]; [P02048](#), p.1. [REDACTED].

<sup>2331</sup> [REDACTED]; [P02048](#), p.1; [1D00857](#), p.2.

<sup>2332</sup> [REDACTED].

<sup>2333</sup> [REDACTED]; TIHIĆSulejman:[P01865](#), p.7; [REDACTED]. See AF1090-1094. Cross-reference Section [III.C.3\(a\)](#).

<sup>2334</sup> DONIARobert:T.49-50(30-Jan-2018); [P01594](#). See AF911.

<sup>2335</sup> [P02739](#); [REDACTED]. See AF1095; AF1077-AF1078.

<sup>2336</sup> Cross-reference Section [III.C.3](#).

<sup>2337</sup> Cross-reference Section [III.C.3\(c\)](#).

<sup>2338</sup> [REDACTED]; [P02048](#), p.1; [P01953](#), p.2; [P00846](#), p.3; [REDACTED]; [P01938](#), p.256-257; [P03612](#), p.3. See AF1081. See also [REDACTED].

<sup>2339</sup> [P03140](#).

of the Unit under the Accused's authority.<sup>2340</sup> CRNI<sub>(DB)</sub> continued to lead his Red Berets in violent crimes with impunity moving along the Posavina Corridor from Bosanski Šamac to Brčko.<sup>2341</sup> When Bosanski Šamac leaders, including TODORVIĆ, went to Belgrade to discuss what to do about CRNI<sub>(DB)</sub>'s criminality, SIMATOVIĆ appeared to be aware of his criminality.<sup>2342</sup> Nevertheless, the Accused re-deployed CRNI<sub>(DB)</sub> to the region later that fall.<sup>2343</sup>

b. The Unit and SDG led other Serb Forces in cleansing and taking power in Brčko

545. Units sent by the Accused converged on the neighboring Muslim-majority municipality<sup>2344</sup> of Brčko in mid-1992, where they repeated the same criminal pattern, committing violent crimes against non-Serbs, forcing many to flee.

546. Since February, Unit members, including Rade and Bozo BOŽIĆ<sub>(DB)</sub>, had been training local Brčko Serbs for future operations along the Posavina Corridor.<sup>2345</sup> In April 1992, after committing atrocities in Bijeljina and Zvornik, the SDG under ARKAN's deputy, PEJA<sub>(DB)</sub>, and MAUZER<sub>(DB)</sub>'s Panthers arrived to join the "special unit" of Brčko-trained Red Berets.<sup>2346</sup> Commencing on 30 April 1992, the takeover of Brčko involved the same pattern of attacks against non-Serbs as carried out in other JCE-targeted municipalities.<sup>2347</sup> Serb Forces quickly took control of the town.<sup>2348</sup>

547. In June 1992, [REDACTED] Unit members to Brčko, led by Živojin IVANOVIĆ<sub>(DB)</sub>.<sup>2349</sup> CRNI<sub>(DB)</sub>'s group also joined IVANOVIĆ<sub>(DB)</sub> there,<sup>2350</sup> and Unit

<sup>2340</sup> [REDACTED]; [P01988](#); [P01989](#).

<sup>2341</sup> *Cross-reference* Section [II.F.4\(b\)\(ii\)b](#).

<sup>2342</sup> [REDACTED].

<sup>2343</sup> *Cross-reference* Section [II.F.4\(b\)\(ii\)d](#). The Bosanski Šamac municipal assembly later decorated CRNI<sub>(DB)</sub> and DEBELI<sub>(DB)</sub> for "the successful command and control of [VRS] units ... the defence of the people and Serbian land". [P03575](#), p.1.

<sup>2344</sup> TABEAUW: [P02069](#), p.21; [1D00034](#), p.1; THEUNENSReynaud: [P01980](#), p.484. *See* AF877.

<sup>2345</sup> *Cross-reference* Section [II.E.4\(c\)\(i\)](#). *See also* [P03149](#), p.3-5; [2D00157](#), p.2.

<sup>2346</sup> *Cross-reference* Section [II.E.4\(c\)\(i\)](#); [P00811](#), p.1; [REDACTED]; THEUNENSReynaud: [P01980](#), p.432-433, 485-489.

<sup>2347</sup> [1D00034](#), p.2; [P00811](#), p.1; [P03363](#), p.2; [REDACTED]. *See* AF878; AF880; AF884; AF888.

<sup>2348</sup> *See* AF885; AF888.

<sup>2349</sup> [REDACTED].

<sup>2350</sup> *Cross-reference* Section [II.D.2\(a\)\(iii\)b](#).



member Vaso MIJOVIĆ<sub>(DB)</sub> brought weapons, ammunition, and fuel from Belgrade for both the Unit and VRS.<sup>2351</sup>

548. During, and in the months following the takeover, Serb Forces—including Unit members and Brčko-trained Red Berets as well as ARKAN's SDG, MAUZER<sub>(DB)</sub>'s Panthers, and other paramilitary units<sup>2352</sup>—targeted non-Serbs by murdering them, looting their property, and destroying their religious institutions, forcing them to leave the municipality.<sup>2353</sup> The Unit swiftly assumed authority over the local police, and started “looting and killing Muslims”.<sup>2354</sup> Executed non-Serb civilians were buried in mass graves and initially covered with debris from destroyed mosques, before plans could be made to secretly transfer them.<sup>2355</sup> Unit members raped women and children in the Luka camp and at a house designated for that purpose.<sup>2356</sup> The Unit, Brčko-trained Red Berets, and other Serb Forces arbitrarily arrested, detained, tortured and subjected to inhumane treatment other non-Serbs, including women and children, at various locations.<sup>2357</sup> Demonstrating JCE members' close coordination and the interrelated nature of this system of ill-treatment in detention facilities in and outside of BiH, Serb Forces shuttled many of these non-Serb detainees between Brčko and other municipalities, such as Bosanski Šamac or Bijeljina, and deported some to prisons in Serbia.<sup>2358</sup>

549. [REDACTED].<sup>2359</sup> [REDACTED].<sup>2360</sup> [REDACTED].<sup>2361</sup> [REDACTED].<sup>2362</sup>

c. Unit members and other Serb Forces took over Doboj

550. The Accused deployed Unit members to train Red Berets, and take over Doboj, a municipality with a significant fraction of non-Serbs,<sup>2363</sup> located in northern BiH at the

<sup>2351</sup> [REDACTED].

<sup>2352</sup> STOPARIĆGoran:[P00796](#), para.61,63; [REDACTED]; [P03279](#), p.5; [P00846](#), p.3; [REDACTED]; [1D00034](#), p.3. *See also* AF880-AF881.

<sup>2353</sup> THEUNENSReynaud:[P01980](#), p.488-489; [1D00034](#), p.6; STOPARIĆGoran:[P00801](#), para.4; [P00811](#), p.1-2; STOPARIĆGoran:[P00796](#), para.64-65; STOPARIĆGoran:T.32-33(7-Nov-2017); [REDACTED]; [2D00083](#), p.3; [REDACTED]. *See* AF887-AF888; AF891.

<sup>2354</sup> [REDACTED]; [P01951](#); [P02960](#), p.19; [P00811](#), p.1. *See also* [P03149](#), p.3-5.

<sup>2355</sup> [P00811](#), p.2-3.

<sup>2356</sup> [1D00905](#), p.2,3(including Rade BOŽIĆ<sub>(DB)</sub>, Božo BOŽIĆ<sub>(DB)</sub>); [1D00034](#), p.5-6; [REDACTED]; THEUNENSReynaud:[P01980](#), p.488-489; [P00811](#), p.1; [2D00083](#), p.3.

<sup>2357</sup> [REDACTED]; [P01619](#); [P01853](#)(00:29:30-00:30:40)(00:32:30-00:32:43), p.13,15; LUKAČDragan:[P02732](#), T.1805-1806; TIHIĆSulejman:[P01865](#), p.15-18. *See* AF884; AF889-AF890.

<sup>2358</sup> ĐUKIĆPetar:T.22(22-Jan-2020); TIHIĆSulejman:[P01865](#), p.15-18; [P01853](#)(00:29:30-00:30:40)(00:32:30-00:32:43), p.13,15; LUKAČDragan:[P02732](#), T.1805-1806.

<sup>2359</sup> *Cross-reference* Section [II.F.4\(a\)\(ii\)c](#). [REDACTED].

<sup>2360</sup> *Cross-reference* Section [II.F.4\(a\)\(ii\)c](#); Section [IV.C.4\(b\)](#). [REDACTED].

<sup>2361</sup> [REDACTED].

western end of the Posavina Corridor.<sup>2364</sup> After establishing a training camp on nearby Mt. Ozren, where they trained local Serbs, Unit members and Ozren-trained Red Berets attacked Doboj on BOŽOVIĆ<sub>(DB)</sub>'s order, killing, arresting, detaining, and expelling Muslims in short order. Unit members also established another camp, Vila, in Doboj town, and Serb Forces abused Muslim and Croat detainees in horrendous fashion.

i. The SDS took over the local government and armed local Serbs

551. Led by high-ranking Doboj SDS officials and KARADŽIĆ loyalists Milan NINKOVIĆ and Andrija BJELOŠEVIĆ,<sup>2365</sup> the Doboj SDS prepared for ethnic separation throughout 1991, and had begun arming the Serb population and creating a separate Serb police force by October 1991.<sup>2366</sup> KARADŽIĆ often attended SDS rallies in Doboj calling for ethnic separation.<sup>2367</sup> After a meeting with KARADŽIĆ in October 1991,<sup>2368</sup> SDS Municipal Board President NINKOVIĆ announced that Doboj's Serbs had proclaimed the municipality an inseparable part of Yugoslavia.<sup>2369</sup> One Muslim resident described this decision as a "bombshell", the moment when the ethnic unrest in Doboj crystallised: "when this decision was taken, that was the end, and the Serbs no longer wanted to live together with us. That's what the decision meant."<sup>2370</sup> Under BJELOŠEVIĆ, CSB Doboj's police chief,<sup>2371</sup> in March 1992, the SDS took over the police, taking over other state and municipal institutions around the same time.<sup>2372</sup> In April, pursuant to an agreement in Belgrade, Milovan STANKOVIĆ, a local military commander, became Doboj TO Staff Commander.<sup>2373</sup>

<sup>2362</sup> [REDACTED].

<sup>2363</sup> TABEAUwa: [P02069](#), p.21,23,28; HADŽOVIĆEdin: [P02008](#), para.2; [REDACTED].

<sup>2364</sup> THEUNENSReynaud: [P01980](#), p.490. See AF1147.

<sup>2365</sup> HADŽOVIĆEdin: [P02008](#), para.4.

<sup>2366</sup> HADŽOVIĆEdin: [P02011](#), T.2218; HADŽOVIĆEdin: [P02009](#), para.1; HADŽOVIĆEdin: [P02008](#), para.6; HADŽOVIĆEdin: T.6,9-10,32(28-Mar-2018). See AF741.

<sup>2367</sup> HADŽOVIĆEdin: [P02008](#), para.4; HADŽOVIĆEdin: [P02011](#), T.2210; [P03108](#).

<sup>2368</sup> HADŽOVIĆEdin: [P02011](#), T.2218.

<sup>2369</sup> [P02013](#).

<sup>2370</sup> HADŽOVIĆEdin: [P02011](#), T.2218.

<sup>2371</sup> [REDACTED]; [P02881](#); HADŽOVIĆEdin: T.32(28-Mar-2018); HADŽOVIĆEdin: [P02008](#), para.12.

See also [2D00188](#).

<sup>2372</sup> HADŽOVIĆEdin: T.30(28-Mar-2018).

<sup>2373</sup> [P03163](#); [P03578](#); HADŽOVIĆEdin: [P02024](#), p.6; HADŽOVIĆEdin: [P02011](#), T.2269.

ii. The Unit under BOŽOVIĆ<sub>(DB)</sub> trained, and the SDS armed, Serb Forces on Mt. Ozren

552. By April 1992, the Accused deployed BOŽOVIĆ<sub>(DB)</sub> from Pajzoš with a group of Unit members to train Serbs from Doboj and surrounding areas at the SerbianDB's Mt. Ozren camp.<sup>2374</sup> [REDACTED] Doboj police, JNA, and volunteers went to Ozren for training,<sup>2375</sup> [REDACTED].<sup>2376</sup> BJELOŠEVIĆ gave the Ozren-trained Red Berets certificates giving them the same rights as RS-MUP members.<sup>2377</sup> The SDS also organised and distributed arms to Serbs from Mt. Ozren.<sup>2378</sup>

iii. The Unit and other Ozren-trained forces under BOŽOVIĆ<sub>(DB)</sub> attacked Doboj, established another training camp at Vila, and committed crimes

553. On BOŽOVIĆ<sub>(DB)</sub>'s order, during the Muslim Bajram holiday on 3 May 1992,<sup>2379</sup> the Unit and Ozren-trained Red Berets, STANKOVIĆ's TO forces, the RS-MUP, and Serb paramilitaries, attacked Doboj, capturing it in less than five hours.<sup>2380</sup> Known Ozren-trained criminal and SDS member Slobodan KARAGIĆ aka KARAGA<sub>(DB)</sub>, operating under BOŽOVIĆ<sub>(DB)</sub>'s command, drove through Doboj in a police car with a megaphone, demanding Muslims to surrender their weapons,<sup>2381</sup> as the Unit and various units under the auspices of Ozren-trained Red Berets began rounding up, arresting and detaining Muslims.<sup>2382</sup> Within four days, the town had been "completely cleansed" as Serb Forces drove Muslims and Croats out of their homes.<sup>2383</sup>

554. [REDACTED].<sup>2384</sup> The Ozren-trained Red Berets received orders directly from BOŽOVIĆ<sub>(DB)</sub>,<sup>2385</sup> who in turn reported to SIMATOVIĆ.<sup>2386</sup> The Unit established another training camp known as "Vila" in Doboj town near Perčin's Disco.<sup>2387</sup> Unit

<sup>2374</sup> Cross-reference Section [II.E.4\(c\)\(ii\)](#).

<sup>2375</sup> Cross-reference Section [II.E.4\(c\)\(ii\)](#). [REDACTED].

<sup>2376</sup> [REDACTED].

<sup>2377</sup> [P01167](#).

<sup>2378</sup> HADŽOVIĆEdin:[P02009](#), para.1; HADŽOVIĆEdin:T.32(28-Mar-2018).

<sup>2379</sup> [REDACTED]. See AF1152; [REDACTED].

<sup>2380</sup> Cross-reference Section [III.C.4\(a\)](#).

<sup>2381</sup> HADŽOVIĆEdin:[P02008](#), para.11; HADŽOVIĆEdin:[P02009](#), p.3; HADŽOVIĆEdin:T.6,21(28-Mar-2018). See AF1155.

<sup>2382</sup> RFJ-165:T.20(29-May-2018); [REDACTED]. Cross-reference Section [III.C.4](#).

<sup>2383</sup> Cross-reference Section [III.C.4\(a\)](#).

<sup>2384</sup> [REDACTED].

<sup>2385</sup> [REDACTED].

<sup>2386</sup> Cross-reference Section [II.D.2\(a\)\(iii\)c](#).

<sup>2387</sup> Cross-reference Section [II.E.4\(c\)\(ii\)](#).

members used non-Serb detainees from Vila as a human shield and killed them.<sup>2388</sup> BOŽOVIĆ<sub>(DB)</sub> transferred [REDACTED] Ozren-trained Red Berets to Vila<sup>2389</sup> and appointed KARAGA<sub>(DB)</sub> to run the camp.<sup>2390</sup> KARAGA<sub>(DB)</sub> used the men under his command to loot and commit other crimes.<sup>2391</sup>

555. Following the takeover, Unit members led Ozren-trained Red Berets in expelling Muslims from the town and surrounding villages, killing some while arresting and detaining others.<sup>2392</sup> Ozren-trained Red Berets and other Serb Forces also detained Muslims and Croats in horrendous conditions, subjecting them to torture such as extracting their teeth for gold.<sup>2393</sup> The “Miloš” group reported to the SerbianDB, describing the ongoing crime in Doboj.<sup>2394</sup>

iv. Ozren-trained Red Berets committed crimes in nearby Teslić

556. Ozren-trained Red Berets repeated the same criminal pattern in neighboring Teslić municipality, where Serbs were only a relative majority, comprising 45% of its population.<sup>2395</sup> By June, the results BOŽOVIĆ<sub>(DB)</sub> had achieved in Doboj so impressed like-minded Serbs that one defence official praised “[t]he Doboj Experience” as “an example of how a Serbian State should be created”. Charged with addressing the security situation in Teslić, he said he would bring in BOŽOVIĆ<sub>(DB)</sub>, who with his group would train army and police units in “mopping up the terrain”.<sup>2396</sup> In early June 1992, Ozren-trained Red Berets, and members of the Miće Group, [REDACTED],<sup>2397</sup> went to Teslić.<sup>2398</sup> They took over the Teslić SJB building, and the Teslić official who had brought them proclaimed: “We are here to drive the Turks and Ustashas out of this Serbian territory because this land belongs to us”.<sup>2399</sup>

<sup>2388</sup> Cross-reference Section [III.C.4\(c\)](#).

<sup>2389</sup> [REDACTED]; [P02016](#), p.9. See also HADŽOVIĆEdin:[P02011](#), T.2235-2236.

<sup>2390</sup> [REDACTED]; RFJ-165:T.17(29-May-2018).

<sup>2391</sup> [REDACTED]. Cross-reference Section [II.F.4\(b\)\(ii\)c](#); Section [III.C.4\(b\)](#).

<sup>2392</sup> Cross-reference Section [III.C.4\(b\)](#).

<sup>2393</sup> Cross-reference Section [III.C.4\(b\)](#).

<sup>2394</sup> [P03178](#). RADULOVIĆ<sub>(DB)</sub> also reported to the RS-MUP about crimes within the Doboj area. See [P03490](#). Cross-reference Section [II.F.4\(a\)\(ii\)b](#).

<sup>2395</sup> TABEAUW:[P02069](#), p.21,23,28. See AF906.

<sup>2396</sup> [P00841](#), p.3. See [P00500](#), p.11(Unit member Milenko POPOVIĆ’s personnel file describing activities in Teslić); [REDACTED]; THEUNENSReynaud:[P01980](#), p.494.

<sup>2397</sup> [REDACTED].

<sup>2398</sup> [REDACTED]. The Miće Group was comprised of typical criminals as well as active and reserve employees of the State Security Service: [P02380](#), p.1.

<sup>2399</sup> [P02379](#), p.3.

557. The group from Doboj arrested Croats and Muslims, including former members of the Teslić police, detaining them in unhygienic conditions in the SJB building, and beating them.<sup>2400</sup> The beatings and maltreatment became “common place”, and one Ozren-trained Red Beret beat ten prisoners to death.<sup>2401</sup> In an effort to push non-Serbs out of the entire area, the Red Berets behaved like a “pack of wild beasts”,<sup>2402</sup> as they raped and looted.<sup>2403</sup> KARAGA<sub>(DB)</sub> joined them with another unit, which committed further crimes in Teslić.<sup>2404</sup>

558. When the criminality began to affect local Serbs,<sup>2405</sup> forces of the Banja Luka CSB took control of Teslić and arrested the Ozren-trained Red Berets, including KARAGA<sub>(DB)</sub>.<sup>2406</sup> [REDACTED].<sup>2407</sup>

d. The Accused deployed the Unit to coordinate with RSK-MUP, RS-MUP and VRS in Operation Koridor 92

559. The Serb Forces’ further efforts to achieve the Strategic Goal of establishing a Serb-controlled land corridor between the RSK, the western part of the RS, and Serbia followed the same pattern, occurring in two phases of Operation Koridor 92.<sup>2408</sup> The first began in late June 1992, following the Serb takeovers of Bosanski Šamac, Brčko, Doboj, and Teslić.<sup>2409</sup> VRS, Unit members,<sup>2410</sup> RS-MUP units, and RSK-MUP units deployed by MARTIĆ,<sup>2411</sup> including under SerbianDB operative Dušan MOMČILOVIĆ<sub>(DB)</sub>,<sup>2412</sup> moved north from Doboj towards Derventa and Modriča.<sup>2413</sup> [REDACTED],<sup>2414</sup> [REDACTED].<sup>2415</sup>

<sup>2400</sup> [P03488](#), p.3-4; [P02379](#), p.5.

<sup>2401</sup> [P03488](#), p.4-6; [P02379](#), p.10,12; [P02380](#), p.4; [REDACTED]; [P02377](#).

<sup>2402</sup> [P02380](#), p.7; [REDACTED].

<sup>2403</sup> [REDACTED]; [1D00882](#), p.2; [P03592](#), p.1-3; [P03490](#).

<sup>2404</sup> [P03498](#), p.1; [P03489](#); [REDACTED].

<sup>2405</sup> [REDACTED]; [1D00882](#), p.2; [P03592](#), p.1-2. See [P03490](#).

<sup>2406</sup> [P02380](#), p.2; [P03592](#), p.2.

<sup>2407</sup> [REDACTED]. See AF908.

<sup>2408</sup> THEUNENSReynaud:[P01980](#), p.502,512.

<sup>2409</sup> THEUNENSReynaud:[P01980](#), p.502.

<sup>2410</sup> [REDACTED].

<sup>2411</sup> [P03414](#). See also [P03593](#); [P03595](#).

<sup>2412</sup> [P00160](#), p.30; [P03732](#), p.2; [P02358](#), p.12-13. Cross-reference Section [II.F.1\(c\)\(ii\)a](#).

<sup>2413</sup> [P03699](#), p.1; [P02375](#), p.2; THEUNENSReynaud:[P01980](#), p.513-516.

<sup>2414</sup> Cross-reference Section [II.C.8](#).

<sup>2415</sup> [REDACTED].

560. In autumn 1992, Serb Forces prepared for the second phase of Operation Koridor 92.<sup>2416</sup> At the beginning of October, following requests from Bosanski Šamac municipal authorities and the VRS to the SerbianDB,<sup>2417</sup> with **STANIŠIĆ**'s knowledge, **SIMATOVIĆ** re-deployed CRNI<sub>(DB)</sub>'s Unit, including LUGAR<sub>(DB)</sub> and DEBELI<sub>(DB)</sub> to Bosanski Šamac. There they joined the VRS in further operations to expel non-Serbs from the Posavina Corridor.<sup>2418</sup> Under MARTIĆ, RSK forces joined the Serb Forces already operating in the Posavina Corridor.<sup>2419</sup> The Koridor 92 operation left the entire Posavina area devastated, with many houses torched and many non-Serb civilians killed.<sup>2420</sup>

(iii) Serb Forces forcibly removed non-Serbs from the ARK

a. The Accused coordinated with ARK leaders to establish separate Serb structures and forces in the region

561. To the west of the Posavina Corridor,<sup>2421</sup> the Bosnian Krajina regional association was “[b]y far the most active” of the regional communities,<sup>2422</sup> attempting to unite with its Croatian counterparts since the summer of 1991.<sup>2423</sup> That autumn, it was renamed the ARK, encompassing the municipalities of Banja Luka, Sanski Most, and numerous others.<sup>2424</sup>

562. **STANIŠIĆ** coordinated with key individuals in the ARK to prepare Serb structures and forces for advancing the CCP there. BRĐANIN became vice-president of the ARK by January 1992,<sup>2425</sup> and was subject to **STANIŠIĆ**'s influence.<sup>2426</sup> SDS and ARK Crisis Staff member Nenad STEVANDIĆ took instruction from **STANIŠIĆ** about

<sup>2416</sup> THEUNENSReynaud:[P01980](#), p.502,512.

<sup>2417</sup> [P01953](#), p.3; [P03142](#), p.1; [P03612](#), p.3.

<sup>2418</sup> [P01988](#); [P01989](#); [P00846](#), p.3-4,6; [REDACTED].

<sup>2419</sup> [P03443](#), p.3-4. *See also* [P03420](#); AF875.

<sup>2420</sup> [REDACTED]; BABIĆMilan:[P01246](#), T.13081-13082; [REDACTED]. *See* AF874.

<sup>2421</sup> DONIARRobert:T.39-41(30-Jan-2018); [P01592](#).

<sup>2422</sup> DONIARRobert:T.16(30-Jan-2018). *See* [P03172](#).

<sup>2423</sup> *Cross-reference* Section [II.F.4\(a\)\(i\)](#).

<sup>2424</sup> DONIARRobert:[P01600](#), p.35; THEUNENSReynaud:[P01980](#), p.373. *See* AF726; AF487.

<sup>2425</sup> DONIARRobert:T.65(31-Jan-2018).

<sup>2426</sup> *E.g.* [P02772](#), p.2,6.

political strategy and discussed establishing a network of training camps in BiH modeled on the Accused's Golubić camp.<sup>2427</sup>

563. Serb paramilitaries proliferated in the ARK, among them the Wolves of Vučjak, led by Golubić-trained Veljko MILANKOVIĆ,<sup>2428</sup> which committed crimes targeting Muslims across the ARK region.<sup>2429</sup> [REDACTED].<sup>2430</sup> The SDS established a paramilitary, the Serbian Defence Forces ("SOS"), in multiple municipalities,<sup>2431</sup> including Sanski Most.<sup>2432</sup> STEVANDIĆ established the Banja Luka SOS, which wore red berets and included convicted criminals,<sup>2433</sup> and was later placed under the Banja Luka CSB.<sup>2434</sup>

564. In late April/early May 1992, the ARK government established a regional Crisis Staff, which issued persecutory decisions concerning non-Serbs—such as barring them from holding employment<sup>2435</sup>—which municipal Crisis Staffs were then to implement.<sup>2436</sup> Consistent with this, after receiving the MANDIĆ Memorandum,<sup>2437</sup> CSB Chief Stojan ŽUPLJANIN divided the police within the Banja Luka CSB's jurisdiction along ethnic lines.<sup>2438</sup> ŽUPLJANIN then established a special unit under the Banja Luka CSB's direct control.<sup>2439</sup> Under Ljubomir EĆIM's command, the unit committed numerous crimes throughout 1992 advancing the CCP, including killing civilians and plundering deserted Muslim homes,<sup>2440</sup>. Members of the EĆIM's unit were trained at Pajzoš, and by 1994 SIMATOVIĆ brought them under his authority.<sup>2441</sup>

<sup>2427</sup> NIELSENChristian:T.5-7(15-Nov-2017); [P02772](#), p.3(mentioning having established something "like Golubić" and urging KARADŽIĆ to visit); [P02773](#), p.3-4. See AF837; AF898.

<sup>2428</sup> Cross-reference Section [II.E.4\(a\)\(i\)](#).

<sup>2429</sup> [P02533](#), p.1-3; [P02381](#); [P02534](#), p.2-4; [P03471](#), p.1.

<sup>2430</sup> [REDACTED].

<sup>2431</sup> [REDACTED]. See AF837; AF898.

<sup>2432</sup> Cross-reference Section [III.C.6\(b\)](#).

<sup>2433</sup> NIELSENChristian:T.5-7(15-Nov-2017); RFJ-110:T.67(28-Jun-2018). See AF837; AF898.

<sup>2434</sup> NIELSENChristian:[P00850](#), para.673.

<sup>2435</sup> [P02483](#); [P03574](#). Cross-reference Section [III.C.6\(b\)](#).

<sup>2436</sup> See AF595. See also AF589; AF596.

<sup>2437</sup> Cross-reference Section [II.F.4\(a\)\(ii\)b](#); [P03474](#), p.1.

<sup>2438</sup> NIELSENChristian:[P00850](#), para.641-643,659,661; [P03480](#); [P03484](#); [REDACTED]. See AF1271-AF1272.

<sup>2439</sup> NIELSENChristian:[P00850](#), para.672-673.

<sup>2440</sup> NIELSENChristian:[P00850](#), para.675-676.

<sup>2441</sup> [REDACTED]; [P03513](#), p.4. See also [ID00037](#), p.95; [P03681](#); NIELSENChristian:[P00850](#), para.912.



b. The Sanski Most SDS prepared forces, implemented the Variant A/B Instructions, and took over Sanski Most

565. [REDACTED],<sup>2442</sup> [REDACTED].<sup>2443</sup> [REDACTED].<sup>2444</sup>

566. [REDACTED],<sup>2445</sup> [REDACTED].<sup>2446</sup> [REDACTED].<sup>2447</sup> After KARADŽIĆ distributed the Variant A/B Instructions in December 1991,<sup>2448</sup> the Sanski Most SDS implemented Variant A despite not having the majority in the municipality,<sup>2449</sup> [REDACTED].<sup>2450</sup>

567. The Sanski Most Crisis Staff [REDACTED],<sup>2451</sup> and like other Serb Crisis Staffs, was established in accordance with the Variant A/B Instructions.<sup>2452</sup> [REDACTED].<sup>2453</sup> [REDACTED].<sup>2454</sup>

568. Sanski Most was declared a Serb municipality on 3 April 1992, and the SJB purged non-Serbs from its ranks over the following weeks.<sup>2455</sup> Serb Forces, including paramilitaries under the Crisis Staff, erected checkpoints in Sanski Most town and around non-Serb villages.<sup>2456</sup> On 19 April 1992, when 12 non-Serb police who objected to the recent municipal assembly order to wear the RS insignia and sign a declaration recognising the Serb municipality's laws barricaded themselves inside the municipal building,<sup>2457</sup> Serb Forces including the JNA, TO, and the SOS attacked the building and expelled the recalcitrant officers.<sup>2458</sup> Crisis Staff President RAŠULA dismissed them the same day.<sup>2459</sup>

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<sup>2442</sup> [REDACTED].

<sup>2443</sup> [REDACTED].

<sup>2444</sup> [REDACTED].

<sup>2445</sup> [REDACTED].

<sup>2446</sup> [REDACTED].

<sup>2447</sup> [REDACTED].

<sup>2448</sup> Cross-reference Section [II.F.4\(a\)\(ii\)a](#).

<sup>2449</sup> [P02479](#); [REDACTED].

<sup>2450</sup> [REDACTED]; [P02500](#), p.3-4.

<sup>2451</sup> [REDACTED].

<sup>2452</sup> DONIARobert:T.49-51(30-Jan-2018). See also [P01595](#).

<sup>2453</sup> [REDACTED].

<sup>2454</sup> [REDACTED].

<sup>2455</sup> [REDACTED]; RFJ-073:[P02457](#), T.22510. See AF1252. Cross-reference Section [II.F.4\(b\)\(iii\)](#).

<sup>2456</sup> [REDACTED]. See AF1267.

<sup>2457</sup> [P03484](#); [P02478](#), p.13-14; [REDACTED].

<sup>2458</sup> [REDACTED]. See AF1270; AF1274.

<sup>2459</sup> See AF1273.

569. The next day, the Crisis Staff announced that the Serbian municipality of Sanski Most did not recognise the former municipal assembly and that it only recognised the legitimacy of the Serbian municipality and its organs, namely the Serb TO, the Serb SJB, and the JNA.<sup>2460</sup> Any other armed force was deemed paramilitary and would be disarmed,<sup>2461</sup> as all paramilitaries would be brought under the command of the JNA.<sup>2462</sup> The Crisis Staff also fired all non-Serb public employees,<sup>2463</sup> placed the Banja Luka CSB equipment located in the SJB building under the control of the Serb police, and dispatched RAŠULA to visit the ARK leadership and obtain guidelines for further action.<sup>2464</sup>

570. In June 1992 the Crisis Staff—in a directive implementing the Six Strategic Goals<sup>2465</sup>—appointed RAŠULA among the persons responsible for “solving the question of prisoners”, specifically by classifying and deporting politicians, nationalists and “undesirables”.<sup>2466</sup> Two days later, [REDACTED] were expelled along with a group of prisoners to Manjača camp.<sup>2467</sup>

571. In the period following the takeover, Serb Forces killed and expelled non-Serbs from Sanski Most, forcing one group of Muslims to jump from a bridge while VRS soldiers fired at them.<sup>2468</sup> Serb Forces committed numerous other crimes in Sanski Most, including detaining Muslims in deplorably unhygienic conditions where they were also beaten, and forcing them into work details.<sup>2469</sup> The “Miloš” group reported to the SerbianDB about the ongoing crime in Sanski Most.<sup>2470</sup>

<sup>2460</sup> [P03562](#), para.4-5. See AF1277. [REDACTED] [REDACTED].

<sup>2461</sup> [P03562](#), para.4. See AF1277.

<sup>2462</sup> [REDACTED]. See also AF1259; AF487.

<sup>2463</sup> [REDACTED]; RFJ-073:[P02457](#), T.22510. See [P03487](#), p.1; AF1266; AF1278.

<sup>2464</sup> [P03562](#), para.3,5. See AF1276-AF1277.

<sup>2465</sup> DONIARobert:T.49-51(30-Jan-2018).

<sup>2466</sup> [P01595](#). See AF1265.

<sup>2467</sup> [REDACTED]; [P02485](#). Cross-reference Section [III.C.6\(b\)](#).

<sup>2468</sup> Cross-reference Section [III.C.6\(b\)](#).

<sup>2469</sup> Cross-reference Section [III.C.6\(b\)](#).

<sup>2470</sup> [P03178](#). RADULOVIĆ<sub>(DB)</sub> also reported within the RS-MUP on the massive population movement out of Sanski Most by October 1992. See also [P02499](#); cross-reference Section [II.F.4\(a\)\(ii\)b.ii](#).

(iv) The Accused and other JCE members planned the operations in the Podrinje region and deployed the Unit, and other SerbianDB-trained forces alongside VRS and VJ, to further the CCP

572. In early 1993, with the Second Strategic Goal (Posavina Corridor) largely accomplished,<sup>2471</sup> the Accused and co-JCE members—MILOŠEVIĆ, BADŽA, MLADIĆ, and KARADŽIĆ trained their sights on the Third Strategic Goal, always through the lens of the First Strategic Goal: creating an ethnically pure corridor in the Podrinje region of eastern BiH, eliminating the Drina River as a border between Serbian states.<sup>2472</sup> Under **SIMATOVIĆ**’s command, the Unit—including their Skelani and Bratunac Red Berets—VRS, VJ, and SerbianJB-PJM forces attacked and drove the Muslim population towards what would become three UN-protected enclaves. The Unit and other Serb Forces tightened the vice around the enclaves, expelling populations and burning their villages behind them, furthering the CCP.<sup>2473</sup>

573. When RS political and military officials met on 8 November 1992, KARADŽIĆ and KRAJIŠNIK tasked MLADIĆ with “solv[ing] ... the problem of the Podrinje area”, by achieving “separation from the Muslims”.<sup>2474</sup> On 19 November 1992, MLADIĆ issued Operational Directive Number 4, ordering the Drina Corps in the wider Podrinje region to “exhaust the enemy, inflict the heaviest possible losses on him and force him to leave the Birač, Žepa, and Goražde areas *together with the Muslim population*”,<sup>2475</sup> reflecting the CCP.

574. The Accused had already begun preparing SerbianDB units for operations in this area. **SIMATOVIĆ** had met in Bajina Bašta, Serbia, with Marko PAVLOVIĆ<sub>(DB)</sub> and eastern BiH Serb municipal leaders around June 1992 about establishing training camps in the region under a “separate structure under his command”,<sup>2476</sup> which resulted in the Unit training local Serbs and forming Red Berets units at its Skelani and Bratunac camps.<sup>2477</sup> The Unit established its Podrinje regional command on Mt. Tara in late 1992

<sup>2471</sup> [P01938](#), p.147.

<sup>2472</sup> [P01591](#), p.1.

<sup>2473</sup> [REDACTED].

<sup>2474</sup> [P01938](#), p.146-147.

<sup>2475</sup> [P01935](#), p.5(emphasis added).

<sup>2476</sup> DERONJIĆMiroslav:[P01717](#), para.134-138. Cross-reference Section [II.E.4\(d\)\(ii\)](#).

<sup>2477</sup> Cross-reference Section [II.E.4\(d\)\(iv\)](#).

or early 1993.<sup>2478</sup> After the ABiH conducted offensive operations in eastern BiH in early January 1993,<sup>2479</sup> VRS units [REDACTED]<sup>2480</sup> and VJ units converged to respond. Various VJ units—the 72<sup>nd</sup> Special Brigade, 63<sup>rd</sup> Parachute Brigade from Niš, and Užice Corps—covertly crossed into eastern BiH,<sup>2481</sup> [REDACTED].<sup>2482</sup>

575. [REDACTED].<sup>2483</sup> [REDACTED].<sup>2484</sup> [REDACTED].<sup>2485</sup> The Skelani Red Berets joined the Skelani operation,<sup>2486</sup> while the VJ fired artillery into BiH from across the Drina in Serbia.<sup>2487</sup>

576. On 22 January 1993, the VRS Main Staff issued an order noting that the Drina Corps had not executed its task from Directive 4 and ordering further action to cleanse the Drina's left bank.<sup>2488</sup> Shortly thereafter, **STANIŠIĆ** and **BADŽA** met at the Unit's Tara command with VRS General **MILOVANOVIĆ** and VJ General **PANIĆ** to discuss the situation in eastern BiH.<sup>2489</sup> At the meeting, **BADŽA** referred to **STANIŠIĆ** as “the boss” and **STANIŠIĆ**'s extensive knowledge of the Podrinje “amazed” **MILOVANOVIĆ**.<sup>2490</sup>

577. In mid-February, **STANIŠIĆ** and **BADŽA** went to Bajina Bašta again, this time with **SIMATOVIĆ**, where they inspected the SMUP units they were preparing for deployment.<sup>2491</sup> On 28 February 1993, **SIMATOVIĆ** went to Mt. Tara for a meeting with VJ and VRS top leadership, including **MLADIĆ**, to plan further operations for Operation Udar,<sup>2492</sup> to execute Directive 4.<sup>2493</sup>

<sup>2478</sup> Cross-reference Section [II.D.2\(a\)\(iv\)](#).

<sup>2479</sup> See e.g. [2D00051](#), p.1-2.

<sup>2480</sup> [REDACTED].

<sup>2481</sup> [REDACTED]; [P00795](#), p.1-2; [REDACTED]; [2D00250](#); [2D00176](#); [2D00245](#); PLAHUTADejan:T.19-26(19-Nov-2019); PLAHUTADejan:T.9(20-Nov-2019); [REDACTED].

<sup>2482</sup> [REDACTED]. See [REDACTED]; [P02056](#). See also [P02063](#); [2D00317](#); PLAHUTADejan:T.26-27(19-Nov-2019).

<sup>2483</sup> [REDACTED].

<sup>2484</sup> [REDACTED].

<sup>2485</sup> [REDACTED].

<sup>2486</sup> [P01942](#), p.1.

<sup>2487</sup> [REDACTED]. See also [REDACTED].

<sup>2488</sup> [1D00109](#), p.1-3.

<sup>2489</sup> **MILOVANOVIĆ**Manojlo:[P02934](#), T.4383-4386,4503,4505,4516-4517; [P00059](#), p.24; PLAHUTADejan:T.44(20-Nov-2019).

<sup>2490</sup> **MILOVANOVIĆ**Manojlo:[P02934](#), T.4384-4385,4516-4517.

<sup>2491</sup> [P02267](#), p.1-2; [P02268](#); PLAHUTADejan:T.51(20-Nov-2019).

<sup>2492</sup> [P01943](#), p.137. See [REDACTED].

<sup>2493</sup> [P01591](#), p.1; [REDACTED]; **MILOVANOVIĆ**Manojlo:[P02934](#), T.4533; [2D00171](#), p.2; PLAHUTADejan:T.47-48(21-Nov-2019). See [P02272](#); PLAHUTADejan:T.60-61(20-Nov-2019).

578. By this time, Serb Forces had seized most of Skelani municipality, as well as the villages Kravica and Glogova in Bratunac municipality, which lay northwest of Skelani and north of Srebrenica.<sup>2494</sup> Having received multiple reports detailing the deteriorating humanitarian situation around Srebrenica, the ECMM sent MLADIĆ a written warning on 2 March to cease expelling and abusing the civilian population in the eastern BiH enclaves.<sup>2495</sup> Instead, Serb Forces continued to attack the Muslim population from several directions in March 1993.<sup>2496</sup>

579. North of Srebrenica, the Accused engaged the Unit under MIJOVIĆ<sub>(DB)</sub>, who commanded the Bratunac Red Berets, in operations in the Kravica area alongside VJ units, VRS units [REDACTED],<sup>2497</sup> and MAUZER<sub>(DB)</sub>'s unit,<sup>2498</sup> forcing the Muslim population out of that area.<sup>2499</sup>

580. South of Srebrenica, the Accused deployed the Unit under BOŽOVIĆ<sub>(DB)</sub>, who commanded<sup>2500</sup> "Frenki's men", [REDACTED],<sup>2501</sup> and SerbianJB-PJM units which had been told before departing Serbia that if captured in BiH, they must not reveal that they were from the SMUP.<sup>2502</sup> Once deployed, the SerbianJB-PJM members received training from the Unit and knew that **SIMATOVIĆ** was their main commander.<sup>2503</sup> Frenki's men and the SerbianJB-PJM units swept through the area south of Srebrenica, from the Serbian border towards Osmaće, looting and systematically burning homes as they moved from village to village to clear out and prevent the return of the Muslim civilian population, pushing the population north towards Srebrenica.<sup>2504</sup>

581. [REDACTED],<sup>2505</sup> [REDACTED].<sup>2506</sup> [REDACTED].<sup>2507</sup>

<sup>2494</sup> [2D00328](#).

<sup>2495</sup> [P00144](#), p.1; [REDACTED].

<sup>2496</sup> See [2D00079](#), p.1; [2D00328](#).

<sup>2497</sup> [REDACTED].

<sup>2498</sup> [P02060](#); [REDACTED]; [P01944](#). See also [1D00036](#), p.76; MILOVANOVIĆManojlo:[P02935](#), T.14512,15517.

<sup>2499</sup> DERONJIĆMiroslav:[P01717](#), para.148; [2D00833](#), para.2. See [P01941](#), p.3; [P02834](#), p.43,47; [1D00070](#), p.2; [1D00896](#), p.2.

<sup>2500</sup> [REDACTED]; RFJ-083:T.29-30,60(10-May-2018).

<sup>2501</sup> [REDACTED].

<sup>2502</sup> RFJ-083:T.8-10,12,17(8-May-2018); [P02267](#); RFJ-083:T.6(9-May-2018).

<sup>2503</sup> [REDACTED]; RFJ-083:T.19(8-May-2018). Cross-reference Section [II.E.4\(d\)\(ii\)](#).

<sup>2504</sup> [REDACTED]; RFJ-083:T.22-23,29-30(8-May-2018); RFJ-083:T.29-30,61-63(10-May-2018); [P02058](#), p.1.

<sup>2505</sup> [REDACTED]; RFJ-083:T.5(9-May-2018); [REDACTED].

<sup>2506</sup> [REDACTED].

<sup>2507</sup> [REDACTED].

582. [REDACTED].<sup>2508</sup> [REDACTED].<sup>2509</sup> [REDACTED].<sup>2510</sup> [REDACTED].<sup>2511</sup>

583. Frenki's men and the other Serb Forces continued "eating up village by village".<sup>2512</sup> Around 20 March 1993, approximately 1,500 to 2,000 Serb fighters from many units, including Frenki's men and [REDACTED], descended upon Osmaće,<sup>2513</sup> [REDACTED].<sup>2514</sup> [REDACTED].<sup>2515</sup> MLADIĆ visited Osmaće on 24 March, the day after a report by the Skelani Independent Battalion confirmed that the village was "empty".<sup>2516</sup>

584. As the UN reported, a "[n]on stop" stream of refugees emanated from the villages taken by Serb Forces.<sup>2517</sup> First shelling and then attacking with ground forces,<sup>2518</sup> UNPROFOR reported "systematic cleansing of the Srebrenica enclave that has been going on full force now since at least the beginning of March and perhaps since early January".<sup>2519</sup> Muslims from Cerska, Kamenica, Konjević Polje, and Osmaće poured into the Srebrenica, Žepa, and Goražde enclaves.<sup>2520</sup> [REDACTED].<sup>2521</sup>

585. [REDACTED].<sup>2522</sup> [REDACTED].<sup>2523</sup> [REDACTED].<sup>2524</sup>

586. [REDACTED].<sup>2525</sup> However, despite the cancellation of the Srebrenica operation, the SerbianDB units remained in eastern BiH,<sup>2526</sup> and KARADŽIĆ and MLADIĆ

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<sup>2508</sup> [REDACTED].

<sup>2509</sup> [REDACTED].

<sup>2510</sup> [REDACTED].

<sup>2511</sup> [REDACTED].

<sup>2512</sup> [P02270](#).

<sup>2513</sup> See [P02270](#).

<sup>2514</sup> [REDACTED].

<sup>2515</sup> [REDACTED].

<sup>2516</sup> [P02058](#), p.1; [P02059](#), p.1.

<sup>2517</sup> [P02270](#).

<sup>2518</sup> [P02270](#); [P02271](#), p.2; RFJ-083:T.26-27(8-May-2018).

<sup>2519</sup> [P02271](#), p.2; PLA HUTADejan:T.63(20-Nov-2019).

<sup>2520</sup> WILSONJohn:T.5-6(28-Jun-2017); [REDACTED].

<sup>2521</sup> [REDACTED]. See [P00170](#).

<sup>2522</sup> [REDACTED].

<sup>2523</sup> [REDACTED].

<sup>2524</sup> [REDACTED].

<sup>2525</sup> [REDACTED].

<sup>2526</sup> [1D00070](#), p.1-2(demonstrating that the SerbianDB units were still present in eastern BiH and under SerbianDB/SMUP control in May 1993); [P01942](#), p.2; [1D00069](#); [P03623](#); [P01946](#), p.1; [P03625](#), p.2; [1D00116](#), p.1; [P03243](#); [P02274](#), p.1; [REDACTED].

continued to consult MILOŠEVIĆ and STANIŠIĆ, who offered them units, to plan operations in eastern BiH later that year.<sup>2527</sup>

587. The result of Operation Udar and related Podrinje operations was that “the enemy was squeezed into enclaves”,<sup>2528</sup> including the civilian population: Srebrenica town swelled to between 50,000 and 60,000 people.<sup>2529</sup> People slept on the streets and in the school as VJ artillery targeted the town.<sup>2530</sup> On 13 April 1993, the Bosnian Serbs told UNHCR representatives that they would attack the town within two days unless the Bosnian Muslims surrendered and agreed to be evacuated.<sup>2531</sup> Three days later, the UN Security Council passed a resolution declaring Srebrenica and its surroundings a “safe area”, and Žepa and Goražde were declared UN-protected enclaves.<sup>2532</sup> Without the UN’s intervention, SIMATOVIĆ, MLADIĆ, and their co-the JCE members would have achieved the Third Strategic Goal in April 1993.<sup>2533</sup>

### **5. JCE members continued to pursue the CCP throughout Serb-claimed territories in Croatia and BiH in 1993-1995**

588. From early 1993, the shifting balance of power on the BiH battlefield,<sup>2534</sup> coupled with mounting international pressure and isolation of Serbia, forced MILOŠEVIĆ and the Belgrade-based JCE membership to alter their strategy for achieving the CCP in BiH. MILOŠEVIĆ, who had to this point found his fellow JCE members in BiH to be “amenable work mates in his plans of carving out a Bosnian Serb entity,”<sup>2535</sup> came under increasing pressure to force them to bring the conflict to an end and to gain relief from a withering international sanctions regime that was devastating the Serbian economy and undermining his hold on power.<sup>2536</sup>

<sup>2527</sup> E.g. [1D00036](#), p.59-61. See also [P03620](#), p.3.

<sup>2528</sup> [P01944](#), p.3.

<sup>2529</sup> AF1173.

<sup>2530</sup> RFJ-068:T.18(12-Jun-2018); [REDACTED]; SALKIĆOsman:[P01239](#), p.6.

<sup>2531</sup> AF1175.

<sup>2532</sup> See AF1176.

<sup>2533</sup> See DERONJIĆMiroslav:[P01717](#),para.157; DERONJIĆMiroslav:[P01719](#),T.29628; [1D00110](#); [REDACTED].

<sup>2534</sup> DONIARobert:T.62(2-Feb-2018); DONIARobert:[P01599](#), p.17; DONIARobert:[P01598](#), p.21.

<sup>2535</sup> ROBERTSIvor:T.9-10(15-Oct-2019); [REDACTED].

<sup>2536</sup> ROBERTSIvor:[1D00430](#), para.58; [REDACTED]; ROBERTSIvor:T.63-65(15-Oct-2019); DONIARobert:[P01599](#), p.17; DONIARobert:T.66(30-Jan-2018); [1D01340](#), p.35;[1D00035](#), p.80.



589. MILOŠEVIĆ thus adopted a two-track policy,<sup>2537</sup> continuing to enable the BiH and Croatian Serb leadership to pursue the CCP, providing full military support and direction to Serb Forces in Croatia and BiH during 1993 to 1995, while adopting a more pragmatic approach in international negotiations to cement, or more discreetly extend, ethnic cleansing gains already achieved. However deep ran the tensions between MILOŠEVIĆ and BiH JCE members, it did not affect the working relationships between the state security services or the armies.<sup>2538</sup>

590. The Accused played leading roles in this continued implementation of the CCP during this period:

- In 1993, MILOŠEVIĆ and the Bosnian Serbs disagreed over the adoption of the Vance-Owen Peace Plan (VOPP).<sup>2539</sup> MILOŠEVIĆ publicly supported the VOPP and urged the Bosnian Serbs to adopt it.<sup>2540</sup> Privately, he asserted that the VOPP preserved the ethnic separation already achieved and could be exploited to promote further ethnic separation.<sup>2541</sup> Despite this disagreement, MILOŠEVIĆ and the Accused continued to provide military support and direction to the Bosnian Serbs, illustrated by the deployment of the VJ, SerbianJB-PJM, and the Unit (commanded by **SIMATOVIĆ**) into Podrinje operations in 1993.<sup>2542</sup>
- In July 1994, the Bosnian Serbs' rejection of the Contact Group Peace Plan (CGP) exacerbated the tensions with MILOŠEVIĆ and placed him under even greater international pressure to break with them.<sup>2543</sup> Despite this, MILOŠEVIĆ and both Accused poured enormous energy and resources into Operation Pauk in western BiH to preserve the ethnically-cleansed territories of the RSK. As shown below, both Accused played key roles in Pauk.<sup>2544</sup>
- In 1995, MILOŠEVIĆ and the Accused worked to advance the CCP and maintain ethnically cleansed territory abroad despite continued international pressure to cut off the Bosnian Serbs. In July 1995, the Scorpions deployed to Trnovo/Treskavica

<sup>2537</sup> DONIARobert:T.12-13(31-Jan-2018).

<sup>2538</sup> [REDACTED].

<sup>2539</sup> DONIARobert:[P01599](#), p.17; ROBERTSIvor:T.4-5,23-24,54-55(15-Oct-2019).

<sup>2540</sup> ROBERTSIvor:[ID00430](#), para.53; ROBERTSIvor:T.23(15-Oct-2019).

<sup>2541</sup> DONIARobert:T.67-69(30-Jan-2018); DONIARobert:[P01599](#), p.17,25. *See also* [P01607](#), p.14.

<sup>2542</sup> *Cross-reference* Section [II.F.4\(b\)\(iv\)](#).

<sup>2543</sup> ROBERTSIvor:T.58-60,65-66(15-Oct-2019).

<sup>2544</sup> *Cross-reference* Section [II.F.5\(b\)\(ii\)](#).

where they committed the notorious massacre of Bosnian Muslim prisoners.<sup>2545</sup> **STANIŠIĆ** and **SIMATOVIĆ** deployed SerbianDB personnel and ARKAN's SDG to the ARK region of BiH in September-October 1995, where they committed grievous crimes.<sup>2546</sup> After the defeat of Serb Forces in Krajina in Operation Storm, the Accused exercised broad authority in SBWS as the focus of the JCE turned to preserving the ethnic separation already achieved there.<sup>2547</sup>

591. MILOŠEVIĆ's cynical support of international peace plans while concealing his covert direction to, and support of, JCE members in BiH and Croatia make clear that, despite their policy disagreements, MILOŠEVIĆ never abandoned the Strategic Goals, particularly that of ethnic separation, which the Accused, co-JCE members, and Serb Forces implemented violently throughout 1993 to 1995.<sup>2548</sup>

(a) JCE members continued to pursue the CCP during 1993-1995

(i) Policy on implementation of the CCP: 1993

592. Despite disagreements during VOPP negotiations, Belgrade JCE members continued to work closely with their co-JCE members in RS and RSK to pursue the CCP during 1993.

593. Tensions and disagreement between KARADŽIĆ and MILOŠEVIĆ in early 1993 over the VOPP centred on the means of achieving the CCP. KARADŽIĆ opposed the VOPP because it did not satisfy the Bosnian Serbs' Six Strategic Goals.<sup>2549</sup> MILOŠEVIĆ argued that the VOPP constituted an important step in realising what KRAJIŠNIK had called the "most important Serb goal"<sup>2550</sup> of ethnic separation, and that JCE members could take further gradual measures to achieve that goal.<sup>2551</sup>

594. At the 30<sup>th</sup> RS Assembly Session on 5-6 May 1993, MILOŠEVIĆ made it clear that his intent was still aligned with his Bosnian Serb counterparts: "The question was asked, which I find really unacceptable: Whether we give up on our goal? I shall tell you

<sup>2545</sup> Cross-reference Section [II.F.5\(b\)\(iii\)](#).

<sup>2546</sup> Cross-reference Section [II.F.5\(b\)\(iv\)](#).

<sup>2547</sup> Cross-reference Section [II.F.5\(b\)\(v\)](#).

<sup>2548</sup> DONIARobert:T.65-66(30-Jan-2018); DONIARobert:T.11(31-Jan-2018); DONIARobert:[P01599](#), p.15,17.

<sup>2549</sup> [P01596](#); DONIARobert:[P01599](#), p.14,16; DONIARobert:T.61-63(30-Jan-2018).

<sup>2550</sup> DONIARobert:[P01597](#), p.23,26.

no! We do not give up on our goal.” He emphasised that while the VOPP may not complete their shared goal, it “represent[ed] the way towards the ultimate goal”.<sup>2552</sup>

595. Just four months earlier, at the 6<sup>th</sup> Harmonisation Council<sup>2553</sup> session on 9 January 1993, MILOŠEVIĆ advocated exploiting the VOPP to lock in the separation already achieved through ethnic cleansing.<sup>2554</sup> With KARADŽIĆ and KRAJIŠNIK present, MILOŠEVIĆ observed that the most important goal of ethnic separation had already been achieved in the VOPP, and that signing the agreement would lead to further separation through migration flows of the various ethnic groups to their “home” provinces.<sup>2555</sup> The “migration flows” theme was echoed at the 7<sup>th</sup> Harmonisation Council session on 21 January 1993, where MILOŠEVIĆ’s Foreign Minister JOVANOVIĆ described how the gains of ethnic cleansing already achieved could be furthered:

[T]he territory which is gained must be ethnically homogenised as soon as possible, but not by ethnic cleansing, etc. Ethnic cleansing is a ploy; rather, a peacetime process of population exchange, migrations and immigrations, which will unfold.<sup>2556</sup>

596. While ostensibly supporting the VOPP, MILOŠEVIĆ “endorsed attaching burdensome and clearly unacceptable qualifications to agreeing to sign”.<sup>2557</sup> It was telling that MILOŠEVIĆ did not threaten to punish the Bosnian Serbs if they did not sign the VOPP.<sup>2558</sup> On the contrary, he had made clear that support from Serbia and Yugoslavia would remain steadfast.<sup>2559</sup>

597. MILOŠEVIĆ continued to deliver arms and diplomatic and international public relations support for the Bosnian Serbs when they rejected peace.<sup>2560</sup> During early 1993, while ostensibly advocating acceptance of the VOPP, MILOŠEVIĆ’s VJ and SMUP

<sup>2551</sup> DONIARobert:[P01599](#), p.14-15,17-18,25; DONIARobert:T.64-65(30-Jan-2018); DONIARobert:[P01597](#), p.41.

<sup>2552</sup> [1D00035](#), p.79; DONIARobert:[P01597](#), p.41; DONIARobert:T.65-67(30-Jan-2018); DONIARobert:[P01599](#), p.15,17-18.

<sup>2553</sup> DONIARobert:T.52(30-Jan-2018).

<sup>2554</sup> [P01606](#), p.72.

<sup>2555</sup> DONIARobert:[P01599](#), p.17.

<sup>2556</sup> DONIARobert:[P01599](#), p.24; [P01607](#), p.14. KARADŽIĆ embraced JOVANOVIĆ’s idea of manipulating the VOPP to promote further ethnic migrations, to present this as “the factual state of affairs.” See [P01607](#), p.15. The strategy of making life “impossible” for non-Serbs echoed that of RSK Prime Minister ZEČEVIĆ during discussions about the Vance Plan in Croatia. See [P00155](#), p.58.

<sup>2557</sup> DONIARobert:[P01599](#), p.18.

<sup>2558</sup> DONIARobert:[P01599](#), p.17; DONIARobert:T.41-42(1-Feb-2018).

<sup>2559</sup> DONIARobert:[P01597](#), p.39; [1D00056](#), p.7-8,12.

forces (including the Unit), participated in joint ethnic cleansing operations with VRS and TO forces in Operation Udar and related operations in eastern BiH.<sup>2561</sup>

598. MILOŠEVIĆ, STANIŠIĆ, and other JCE members continued to enable the JCE members in RS and RSK to pursue the CCP for the remainder of 1993:

- On 2 July 1993, less than two months after they had rejected the VOPP, KARADŽIĆ and KRAJIŠNIK met STANIŠIĆ, BADŽA, and MLADIĆ, at Mali Zvornik. MILOŠEVIĆ was aware of the meeting.<sup>2562</sup> MLADIĆ noted that “[t]he men who carry /things/ out are sitting here at the table”, naming STANIŠIĆ and BADŽA.<sup>2563</sup> STANIŠIĆ made clear that the SMUP would contribute materially to the VRS and to achieving the CCP in BiH, stating that “[t]he majority of what we need should be issued via the MUP of Serbia”.<sup>2564</sup>
- On 8 July 1993, MILOŠEVIĆ and STANIŠIĆ met with MLADIĆ, KARADŽIĆ, and General PANIĆ.<sup>2565</sup> After KARADŽIĆ stated that the Croats should be helped “in order to force the Muslims to agree on a division of Bosnia,”<sup>2566</sup> STANIŠIĆ expressed his support, proposing that “we from Serbia take over the financing of the MUP ... [t]hat, with the assistance of the police, we help generals MLADIĆ and NOVAKOVIĆ achieve goals”.<sup>2567</sup>
- In the Supreme Defence Council (SDC) meeting on 11 October 1993, MILOŠEVIĆ approved the establishment of the sham VJ 30<sup>th</sup> and 40<sup>th</sup> Personnel Centres that were to regulate the command and payment of VRS and SVK

<sup>2560</sup> DONIARobert:T.12-13(31-Jan-2018); DONIARobert:P01599, p.17-18(KARADŽIĆ and the two other Bosnian Serb participants remained “defiantly belligerent”, advocating to kill ten Croats for every Serb killed by a sniper.).

<sup>2561</sup> Cross-reference Section II.F.4(b)(iv). P01943, p.137; MILOVANOVIĆManojlo:P02934, T.4533; P01944, p.3; P02057; [REDACTED]; [REDACTED]; P03670; P03671; 1D01340, p.33.

<sup>2562</sup> P02890, p.233-234.

<sup>2563</sup> P02890, p.233-234.

<sup>2564</sup> P02890, p.233-234; DONIARobert:T.65-66(2-Feb-2018). See ROBERTSIvor:1D00430, para.57; ROBERTSIvor:T.5(15-Oct-2019).

<sup>2565</sup> PANIĆ, Chief of Staff of the VJ at the time of this meeting, was the former Commander of the JNA 1<sup>st</sup> MD, associated with the *vojna linija* in 1991. P01405, p.2; 1D00015, p.1; VASILJEVIĆAleksandar:P02689, T.15890; [REDACTED]; VASILJEVIĆAleksandar:P02698, T.15904; [REDACTED].

<sup>2566</sup> P02890, p.238-243.

<sup>2567</sup> P02890, p.242-243; MILOVANOVIĆManojlo:P02935, T.15442-15443.

personnel.<sup>2568</sup> To ensure this ruse was hidden from the international community, MILOŠEVIĆ directed that a single copy of the documentation remain only with VJ General Momčilo PERIŠIĆ.<sup>2569</sup> Montenegrin President Momir BULATOVIĆ remarked, “[i]f this [document] were to fall into anybody’s hands, they would keep us under sanctions ten years.”<sup>2570</sup>

- On 21 October 1993, meeting with MLADIĆ, KARADŽIĆ, and others, MILOŠEVIĆ directed the VJ to send 3,000-5,000 men to the RSK, and ordained that VJ personnel be called by the end of the following week to “go to the VRS and [SVK]”.<sup>2571</sup>
- On 8 November 1993, MILOŠEVIĆ, BADŽA, STANIŠIĆ, KARADŽIĆ, KRAJIŠNIK, MLADIĆ, HADŽIĆ, and MARTIĆ attended a meeting at the Presidency of Serbia in Belgrade.<sup>2572</sup> MILOŠEVIĆ pledged that the RS and the FRY would help defend RSK.<sup>2573</sup> The discussions at this meeting, of eight JCE members, made clear that the common goal of those present was ethnic separation from Croats and Muslims and the strategic unification of all Serb-claimed areas.<sup>2574</sup>
- During 13-14 December 1993, STANIŠIĆ hosted a two-day meeting at the SerbianDB in Belgrade, attended by MILOŠEVIĆ, KARADŽIĆ, KRAJIŠNIK, MLADIĆ, BADŽA, M.STANIŠIĆ, and others.<sup>2575</sup> STANIŠIĆ announced the purpose, “to improve [the] operational and tactical position [of the RS] and see about help from Serbia”.<sup>2576</sup> KARADŽIĆ reiterated the Six Strategic Goals, starting with the separation of Bosnian Serbs from Muslims and Croats.<sup>2577</sup> MILOŠEVIĆ agreed to send military conscripts to assist in the conflict. BADŽA

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<sup>2568</sup> [P01954](#), p.24(PERIŠIĆ described it to MILOŠEVIĆ in this way: “[I]n order to avoid having anyone criticise us, we have devised a temporary formation in the Yugoslav Army. We appoint them here; they are not actually here but are performing their duties over where they are stationed”); THEUNENSReynaud:T.2-5(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.417-419.

<sup>2569</sup> [P01954](#), p.24,27.

<sup>2570</sup> [P01954](#), p.27.

<sup>2571</sup> [P02890](#), p.395-396,391-392.

<sup>2572</sup> [ID00036](#), p.19.

<sup>2573</sup> [ID00036](#), p.19-21.

<sup>2574</sup> [ID00036](#), p.25,27

<sup>2575</sup> MILOVANOVIĆManojlo:[P02935](#), T.15445-15446; [ID00036](#), p.53-61.

<sup>2576</sup> [ID00036](#), p.53,60; MILOVANOVIĆManojlo:[P02935](#), T.15445-15446; DONIARobert:T.70(2-Feb-2018).

<sup>2577</sup> [ID00036](#), p.53.

supported the decision to send forces, and **STANIŠIĆ** offered to send his own men.<sup>2578</sup>

599. Sir Ivor ROBERTS asserted that after the Bosnian Serbs rejected the VOPP, MILOŠEVIĆ decided he was going to “cut his cloth differently from the Bosnian Serbs” and “focus on his narrower interests”.<sup>2579</sup> However, neither ROBERTS nor apparently the international community knew the level of MILOŠEVIĆ’s duplicity. Despite communicating directly and frequently with MILOŠEVIĆ during this period, ROBERTS, did not know about the sham Personnel Centres,<sup>2580</sup> and was surprised to learn about the involvement of MILOŠEVIĆ, **STANIŠIĆ**, and Serb Forces in Pauk during 1994 to 1995,<sup>2581</sup> as discussed below. Despite the best efforts of ROBERTS and the international community to end the war by pressuring MILOŠEVIĆ to cut off the Bosnian Serbs, MILOŠEVIĆ never did so. Rather, he actively concealed from them his continuing support of the Bosnian Serb goals, implemented via the Accused and the SerbianDB. Despite disagreement over the VOPP, Belgrade’s support of core JCE goals remained steadfast.<sup>2582</sup>

(ii) Policy on implementation of the CCP: 1994

600. The JCE members’ shared pursuit of the CCP continued in 1994. In the first half of 1994, with **STANIŠIĆ** by his side, RSK President MARTIĆ met KARADŽIĆ in RS to discuss their military cooperation and confirm their continuing solidarity.<sup>2583</sup> By May 1994, the Bosnian Serbs remained utterly dependent on Serbia.<sup>2584</sup> Despite the Bosnian Serbs’ rejection of the CGP in August 1994,<sup>2585</sup> MILOŠEVIĆ, with **STANIŠIĆ**, guaranteed that the Bosnian Serbs had the means to advance and preserve JCE goals, despite increasing pressure from the international community to isolate them.<sup>2586</sup>

<sup>2578</sup> [1D00036](#), p.55-57,60; MILOVANOVIĆManojlo:[P02935](#), T.15445-15446; DONIARobert:T.70-72(2-Feb-2018).

<sup>2579</sup> ROBERTSIvor:T.89(15-Oct-2019).

<sup>2580</sup> ROBERTSIvor:T.77-78(15-Oct-2019); THEUNENSReynaud:T.2-5(7-Mar-2018);

THEUNENSReynaud:[P01980](#), p.417-419.

<sup>2581</sup> ROBERTSIvor:T.84-86(15-Oct-2019).

<sup>2582</sup> DONIARobert:T.72(2-Feb-2018).

<sup>2583</sup> [P00061](#), p.2(00:12:37-00:15:44); [REDACTED]; [P00324](#).

<sup>2584</sup> DONIARobert:[P01597](#), p.49.

<sup>2585</sup> [1D01340](#), p.84-85.

<sup>2586</sup> ROBERTSIvor:T.59(15-Oct-2019).

601. Extensive evidence demonstrates MILOŠEVIĆ's use of the VJ and SMUP to support the Bosnian Serbs throughout 1994, and the Accused's role therein.<sup>2587</sup>

602. A June 1994 SVK Main Staff report reveals Muslim separatist leader ABDIĆ had direct communications with MILOŠEVIĆ, STANIŠIĆ, and MLADIĆ about conducting "offensive activities" in western BiH and obtaining military supplies and ammunition.<sup>2588</sup> ABDIĆ reported he had been "ordered" by MILOŠEVIĆ to win and that MILOŠEVIĆ had approved weapons and ammunition worth US\$9 million.<sup>2589</sup>

603. The following month, the international community presented the CGP.<sup>2590</sup> Concurrently, on RSK Security Day, 5 July 1994, STANIŠIĆ exhorted the Croatian Serbs to continue pursuing the CCP:

We are now entering the decisive phase of the fight to achieve the common goals of all the Serbian lands, more determined and prepared than ever before.<sup>2591</sup>

604. The Bosnian Serbs evidently received this message as well. They promptly rejected the CGP in August 1994,<sup>2592</sup> undoubtedly confident of the continuing direction and support from Belgrade. At this time, MILOŠEVIĆ and STANIŠIĆ were meeting with fellow JCE members MLADIĆ and MARTIĆ in Belgrade to discuss assistance to ABDIĆ.<sup>2593</sup> MILOŠEVIĆ remarked, "[w]e have spent around USD 1,000,000,000 on ammunition and military equipment for the war in RS and the RSK".<sup>2594</sup>

605. In August 1994, MILOŠEVIĆ announced a "blockade" against the Bosnian Serbs, ostensibly to isolate them for rejecting the CGP.<sup>2595</sup> This was a sham to deceive the international community. The so-called blockade was not enforced vis-à-vis the military and their transports, with the SMUP covertly escorting large munitions

<sup>2587</sup> [1D01414](#); [1D00037](#), p.99,103-104,110; [1D00036](#), p.144; [1D00128](#), p.194,216,219-220; [P01415](#); [P01432](#); [1D01215](#), p.25; [P02961](#), p.31; ANASTASIJEVIĆDejan:[P02423](#), para.129-132; [1D01342](#), p.39; [P03169](#); [P03282](#), p.42-46; [1D01324](#), p.51; [P03510](#), p.1-2; [P03267](#); [1D00081](#), p.33-35; [P01956](#); [P03455](#), p.5; [P03677](#); [REDACTED]; [1D01214](#), p.39-53.

<sup>2588</sup> [P03454](#).

<sup>2589</sup> [P03454](#), p.4; KARANMladen:T.23(30-Jan-2020).

<sup>2590</sup> ROBERTSIvor:T.27,60(15-Oct-2019).

<sup>2591</sup> [P03726](#).

<sup>2592</sup> ROBERTSIvor:T.27,60(15-Oct-2019).

<sup>2593</sup> [1D00128](#), p.188-195.

<sup>2594</sup> [1D00128](#), p.194.

<sup>2595</sup> ROBERTSIvor:[1D00429](#), para.5; [REDACTED]; ROBERTSIvor:T.31(15-Oct-2019); ANASTASIJEVIĆDejan:[P02423](#), para.130. See T.68(2-Feb-2018).



shipments for the VRS on a twice weekly basis beginning in late 1994.<sup>2596</sup> ANASTASIJEVIĆ witnessed VJ and VRS or SVK vehicles continuing to pass between Serbia and BiH.<sup>2597</sup>

606. Even as the blockade was announced, the SVK was reporting directly to **STANIŠIĆ** and **PERIŠIĆ** about the situation in western BiH,<sup>2598</sup> and the VJ continued using the sham VJ Personnel Centres to conceal Serbia's support for the VRS and SVK.<sup>2599</sup> [REDACTED].<sup>2600</sup>

607. By October and November of 1994, SerbianDB forces began covertly deploying into western BiH for Pauk, where **STANIŠIĆ** and **SIMATOVIĆ** were directing operations.<sup>2601</sup> [REDACTED].<sup>2602</sup>

608. The Accused's covert deployment and payment of these units, combined with MILOŠEVIĆ's secret financing of VRS and SVK personnel through the sham VJ 30<sup>th</sup> and 40<sup>th</sup> Personnel Centres, enabled MILOŠEVIĆ, **STANIŠIĆ**, and **SIMATOVIĆ** to covertly contribute to ABDIĆ's efforts in destabilising BiH while preserving the ethnic cleansing gains previously achieved in the RSK region.

(iii) Policy on implementation of the CCP: 1995

609. Despite MILOŠEVIĆ's ostensible blockade of the Bosnian Serbs, 1995 saw the Belgrade leadership continuing to provide direction and resources to the Croatian and Bosnian Serbs.

610. Extensive evidence demonstrates MILOŠEVIĆ's use of the VJ and SMUP to support the Bosnian Serbs throughout 1995.<sup>2603</sup> MILOŠEVIĆ, **STANIŠIĆ**, and the FRY/VJ leadership coordinated directly with Croatian and Bosnian Serbs through covert operations and sham VJ units to conceal their conduct from the international community.

<sup>2596</sup> [1D01346](#), p.3-4; [P00852](#), p.8. Cross-reference Section [II.E.3\(b\)](#).

<sup>2597</sup> ANASTASIJEVIĆDejan:[P02423](#), para.130-131.

<sup>2598</sup> [P03460](#), p.4.

<sup>2599</sup> [REDACTED].

<sup>2600</sup> [REDACTED].

<sup>2601</sup> Cross-reference Section [II.F.5\(b\)\(ii\)](#).

<sup>2602</sup> Cross-reference Section [II.F.5\(b\)\(ii\)](#); [REDACTED].

<sup>2603</sup> [1D00057](#), p.6-7,42,73,124-125,140-141; [P03463](#); [P03441](#), p.1,8-9; [P03522](#); [P03523](#); [P02349](#); [REDACTED]; [P01995](#); [P01960](#), p.22,111; [P02897](#); [P02964](#); BABIĆMilan:[P01246](#), T.13083-13086; [1D01344](#), p.49-51; [1D01324](#), p.51; [REDACTED]; [P03727](#); [P03042](#), p.30-33; [P03107](#); [P03041](#); [P03271](#); [P03044](#), p.7-10.

611. The blockade did not apply to MLADIĆ, whose hatred of Muslims was “unbridled and unconcealed”<sup>2604</sup> On a trip to Belgrade in January 1995, he met with Sir Ivor ROBERTS.<sup>2605</sup> As ROBERTS observed, “Mladić was exempt from [the blockade]” if it suited MILOŠEVIĆ to have MLADIĆ in Belgrade.<sup>2606</sup>

612. During early 1995, MILOŠEVIĆ, STANIŠIĆ, and SIMATOVIĆ remained personally involved in directing Pauk operations to preserve the ethnically cleansed RSK territory, despite MILOŠEVIĆ’s promises to the international community to stop enabling the Bosnian Serbs militarily. On 23 February 1995, they met with, *inter alios*, VRS Chief of Staff MILOVANOVIĆ. STANIŠIĆ informed MILOVANOVIĆ that MILOVANOVIĆ was to take over command of Pauk, producing an order appointing MILOVANOVIĆ, signed by MILOŠEVIĆ. MILOVANOVIĆ refused the appointment.<sup>2607</sup>

613. MLADIĆ was back in Belgrade in April 1995, meeting with STANIŠIĆ and the VJ leadership. STANIŠIĆ recounted various shipments of personnel and material he organised (“We transported everything for MARTIĆ”), adding he had sent 150 of “his men” from Slavonia to Pauk. In an obvious reference to evading the ostensible blockade of Bosnian Serbs, STANIŠIĆ referred to sending volunteers, who had to cross the border covertly.<sup>2608</sup>

614. Also in April, MILOŠEVIĆ and STANIŠIĆ confirmed the pre-eminent (yet covert) role of the SerbianDB in controlling the RSK police. On 26 April 1995, an RSK delegation that included BABIĆ met with MILOŠEVIĆ and STANIŠIĆ. STANIŠIĆ vetoed the appointment of an RSK Minister of Interior, saying, “we have invested too much in [the Krajina MUP] for us to relinquish it to somebody else now.”<sup>2609</sup> MILOŠEVIĆ explained that Serbia’s assistance was provided through the SerbianDB rather than the SerbianJB because the SerbianDB “works in a specific clandestine way”.<sup>2610</sup>

<sup>2604</sup> ROBERTSIvor:T.30(15-Oct-2019); ROBERTSIvor:[1D00432](#), p.48.

<sup>2605</sup> ROBERTSIvor:T.31-32,41-42(15-Oct-2019); ROBERTSIvor:[1D00430](#), para.108; [1D00037](#), p.184.

<sup>2606</sup> ROBERTSIvor:T.31-32(15-Oct-2019).

<sup>2607</sup> MILOVANOVIĆManojlo:[P02934](#), T.4391-4395.

<sup>2608</sup> [1D00057](#), p.73; [P02964](#); BABIĆMilan:[P01246](#), T.13514-13515.

<sup>2609</sup> BABIĆMilan:[P01246](#), T.13249-13251.

<sup>2610</sup> BABIĆMilan:[P01246](#), T.13249-13251.

615. The “clandestine way” was operating for the Bosnian Serbs in May 1995. During the RS Assembly Session of 23-24 May 1995, KARADŽIĆ reassured his comrades that the SerbianDB, working in collaboration with the RS-DB and the VJ Main Staff, would continue to meet their needs despite the blockade.<sup>2611</sup>

616. **STANIŠIĆ** and **SIMATOVIĆ** met with BABIĆ, KARADŽIĆ, and KRAJIŠNIK in Bijeljina in May 1995. To evade the blockade, **STANIŠIĆ** and KARADŽIĆ requested BABIĆ to make fictitious payments from the Vukovar SDK to enable the RS to purchase weapons manufactured in Kragujevac, Serbia, as set out in paragraph 264.

617. Tensions rose between the Belgrade and BiH JCE members when the RS leadership took UNPROFOR members hostage.<sup>2612</sup> In June 1995, under pressure from the international community, MILOŠEVIĆ sent **STANIŠIĆ** to intervene with KARADŽIĆ and MLADIĆ to secure the release of UNPROFOR hostages: “Stanišić will tell Karadžić that I will have him killed if he doesn’t release the hostages. He knows I can do it”.<sup>2613</sup> **STANIŠIĆ** delivered the message, securing the hostages’ release on 18 June 1995, flanked by **SIMATOVIĆ** and a contingent of the Unit.<sup>2614</sup> MILOŠEVIĆ’s willingness to use strongarm tactics to bring the RS leadership back in line demonstrates his continuing authority among JCE members and highlights **STANIŠIĆ**’s role in projecting MILOŠEVIĆ’s authority outside of Serbia.<sup>2615</sup>

618. This incident did not interfere with the JCE members’ joint pursuit of the CCP. By month’s end, in a flagrant violation of the blockade, the Accused deployed the Scorpions and SDG under their trusted Unit member MIJOVIĆ<sub>(DB)</sub> into VRS operations outside Sarajevo, in Trnovo and Treskavica.<sup>2616</sup>

619. On 30 June 1995, **STANIŠIĆ** accompanied MILOŠEVIĆ to a meeting at the VJ General Staff with MLADIĆ and ABDIĆ, where **STANIŠIĆ** referenced SMUP control over financing for SVK personnel, through **STANIŠIĆ**’s assets KOJIĆ<sub>(DB)</sub> and

<sup>2611</sup> DONIARobert:[P01597](#), p.89.

<sup>2612</sup> HELGERSMarcus:[1D00549](#), T.10748-10749; [REDACTED].

<sup>2613</sup> ROBERTSIvor:[1D00430](#), para.135; [1D00432](#), p.52; [P02896](#), p.29.

<sup>2614</sup> [REDACTED]; DRAGIČEVIĆVlado:T.36(16-Oct-2019); DRAGIČEVIĆVlado:T.32-33,62-63(17-Oct-2019); [REDACTED]; [REDACTED]; [1D00494](#)(00:11:28-00:12:09); [1D00495](#)(00:12:08-00:15:22); [1D00492](#); [P03155](#); [2D00848](#); [P03156](#), p.17; [REDACTED]; [REDACTED]; [1D01354](#), p.2; [1D00493](#)(02:29:00-02:30:39); [REDACTED]; [2D00502](#), p.49; LUČIĆMiroslav:T.29(9-Sep-2020).

<sup>2615</sup> See ROBERTSIvor:T.19(15-Oct-2019); [REDACTED].

<sup>2616</sup> Cross-reference Section [II.F.5\(b\)\(iii\)](#).

MRGUD<sub>(DB)</sub>.<sup>2617</sup> **STANIŠIĆ** also commented that “we gave 80 from Erdut, we gave 80 from Đeletovci”<sup>2618</sup>—references to the SDG and Scorpions, based in Erdut and Đeletovci, respectively.<sup>2619</sup> **STANIŠIĆ** bristled at SVK commanders’ referring to “[m]en” as “a paramilitary”, making plain that he continued to deploy both the SDG and Scorpions into operations furthering the CCP.<sup>2620</sup> By this time, the SDG and Scorpions had already participated in Pauk, and contingents of these groups had deployed to Trnovo/Treskavica only days earlier.<sup>2621</sup>

620. This close coordination continued for the remainder of the conflict, with **STANIŠIĆ** meeting **KARADŽIĆ** in Pale in early July during the VRS offensive on Srebrenica,<sup>2622</sup> and both Accused deploying the SDG alongside the VRS in operations in the September/October 1995 Banja Luka operations.<sup>2623</sup>

621. On 12 September 1995, after Croatia had driven RSK forces from the Krajina region in Operation Storm, **MILOŠEVIĆ** confirmed that the 30<sup>th</sup> and 40<sup>th</sup> VJ Personnel Centres had always been a “cover-up” in order to hide continuing Belgrade support for and control over VRS and VJ personnel.<sup>2624</sup> With the fall of Krajina, there was no need to continue the fiction of the 40<sup>th</sup> Personnel Centre. It was decided to transfer personnel of the (now non-existent) RSK 40<sup>th</sup> Personnel Centre to the 30<sup>th</sup> Personnel Centre that had been set up to covertly pay VRS personnel.<sup>2625</sup>

622. In a speech in December 1995, **MLADIĆ** emphasised that even during the period of “misunderstandings,” the people of the RS survived “because of the huge and unlimited help of our homeland, Serbia and Montenegro” which “cannot be measured”.<sup>2626</sup> RSK leadership shared this view: RSK-DB Chief **DRAČA** testified that “we could have achieved our aims only through Serbia.”<sup>2627</sup>

<sup>2617</sup> [1D00057](#), p.209. See [P02350](#).

<sup>2618</sup> [1D00057](#), p.204,208; NIELSENChristian:[P00850](#), para.253; NIELSENChristian:T.59(15-Nov-2017).

<sup>2619</sup> STOPARIĆGoran:[P00796](#), para.72; [P00816](#), p.3. See [1D00037](#), p.99.

<sup>2620</sup> [1D00057](#), p.207.

<sup>2621</sup> Cross-reference Section [II.F.5\(b\)\(ii\)](#); Section [II.F.5\(b\)\(iii\)](#).

<sup>2622</sup> DERONJIĆMiroslav:[P01717](#), para.172-175; DERONJIĆMiroslav:[P01719](#), T.29635,29668-29670.

<sup>2623</sup> Cross-reference Section [II.F.5\(b\)\(iv\)](#).

<sup>2624</sup> [P03044](#), p.1,7.

<sup>2625</sup> [P03044](#), p.4-10.

<sup>2626</sup> [P02897](#), p.2-3.

<sup>2627</sup> **DRAČA**Aco:T.38-39(3-Dec-2019).

(b) The Accused and co-JCE members used Serb Forces to pursue the CCP in Croatia and BiH throughout 1993-1995

623. The policy of continued, covert support in the face of international condemnation as revealed above in the discussions between MILOŠEVIĆ, the Accused, and other JCE members played out in several important field operations that advanced the CCP in BiH and Croatia during 1993 to 1995. During this period the Accused deployed the SerbianDB special units—the Unit, SDG, and Scorpions—into successive operations where they coordinated with each other and with other Serb Forces to violently remove non-Serbs through the charged crimes, and maintain Serb control over cleansed territories to prevent non-Serbs’ return.

(i) Podrinje operations in 1993

624. With VOPP negotiations underway, **SIMATOVIĆ** commanded the Unit alongside the VJ and other Serb Forces from early 1993, cleansing Muslims from the Podrinje region to eliminate the Drina border with Serbia (First and Third Strategic Goals).<sup>2628</sup>

(ii) Operation Pauk in 1994-1995

625. In November 1994, MILOŠEVIĆ, **STANIŠIĆ**, and the Belgrade JCE leadership launched Pauk, a joint operation of the SerbianDB, SVK, VJ, VRS, and Muslim separatist leader Fikret ABDIĆ’s forces,<sup>2629</sup> exemplifying the close coordination among JCE members from all regions and furthering the CCP in RSK and RS alike. JCE members’ objective for BiH was to secure the border of territory they had already cleansed along the Una River (First and Fourth Strategic Goals)<sup>2630</sup> by propping up an ally of convenience, ABDIĆ, and restoring his control over the Cazin Krajina/Bihać enclave in northwestern BiH<sup>2631</sup> by defeating the ABiH 5<sup>th</sup> Corps.<sup>2632</sup> In Croatia, this would resolve the problem of the Muslim refugees from western BiH, who had fled into

<sup>2628</sup> Cross-reference Section [II.F.4\(b\)\(iv\)](#).

<sup>2629</sup> BABIĆMilan:[P01246](#), T.13245; THEUNENSReynaud:[P01980](#), p.540-541.

<sup>2630</sup> [P01249](#), p.9-11,24-25; [P01591](#).

<sup>2631</sup> THEUNENSReynaud:[P01980](#), p.26; [P03454](#), p.4-5; [2D00217](#), p.2; [1D00037](#), p.92,94.

<sup>2632</sup> MILOVANOVIĆManojlo:[P02934](#), T.4540-4541; THEUNENSReynaud:T.53-54(6-Mar-2018); [1D00037](#), p.86; KARANMladen:T.49(28-Jan-2020).

what was supposed to be ethnically Serb RSK territory,<sup>2633</sup> and install ABDIĆ's friendly forces as a buffer between RSK and the ABiH.<sup>2634</sup> Thanks to the vital contributions and direction of MILOŠEVIĆ and the Accused—whose Unit **SIMATOVIĆ** touted as “the backbone of Fikret ABDIĆ's army”—Pauk resulted in the successful, albeit short-lived, return of ABDIĆ to Cazin Krajina.<sup>2635</sup>

a. Both Accused played a lead command role in Operation Pauk

626. The roles of the Accused in Pauk exemplify key aspects of their value to the JCE:

- Because of intense international pressure on MILOŠEVIĆ to end the conflict, **STANIŠIĆ** and **SIMATOVIĆ**, as high-level authorities of the SerbianDB, were perfectly placed to ensure Serbia's hand in Pauk would be concealed;
- The *de facto* authority and influence they wielded beyond their *de jure* positions was on full display during Pauk, as they personally engaged in military planning and coordination at the highest level;
- Pauk also exemplifies the Accused's authority over the Unit, the SDG, and the Scorpions—all of which were deployed and financed by the Accused in Pauk, and later in other operations.

627. At MILOŠEVIĆ's insistence,<sup>2636</sup> **STANIŠIĆ** functioned at the highest level of military coordination and command. **STANIŠIĆ** was personally addressed on SVK military reports,<sup>2637</sup> and involved in meetings from July 1994.<sup>2638</sup>

628. **STANIŠIĆ** proposed Pauk during a meeting on 7 October 1994 between MILOŠEVIĆ, the commanders of the three Serb armies—MLADIĆ (VRS), PERIŠIĆ

<sup>2633</sup> KARANMladen:T.52(28-Jan-2020); NOVAKOVIĆRadenko:T.52-53,58-59(18-Sep-2019); [REDACTED].

<sup>2634</sup> KARANMladen:T.14-15(29-Jan-2020); KARANMladen:T.10,62(30-Jan-2020); [ID00508](#), p.3; THEUNENSReynaud:T.53-54(6-Mar-2018); THEUNENSReynaud:[P01980](#), p.26; STOPARIĆGoran:T.37(9-Nov-2017); MILOVANOVIĆManojlo:[ID00947](#), p.26; MILOVANOVIĆManojlo:[P02934](#), T.4390-4393,4534,4541; THEUNENSReynaud:T.48-49(16-Mar-2018).  
<sup>2635</sup> [P00256](#), p.11;THEUNENSReynaud:T.55-56(6-Mar-2018). See [P02887](#), p.134. [REDACTED].

<sup>2636</sup> [ID00037](#), p.93; [P02939](#), p.1.

<sup>2637</sup> Cross-reference Section [II.B.3\(c\)](#); [P02951](#); [P03456](#), p.4; [REDACTED]; [P02952](#); [P03458](#); [P03459](#); [ID00104](#); [ID00105](#); [P03465](#); [P03460](#); THEUNENSReynaud:[P01980](#), p.417,420-421,539-540.

<sup>2638</sup> [ID00128](#), p.188,190-191.

(VJ), ČELEKETIĆ (SVK)—and **STANIŠIĆ**.<sup>2639</sup> **STANIŠIĆ** described the operation he envisioned, which included SerbianDB assets:

I have an idea, if you agree, to consolidate Fikret ABDIĆ and his army ... We could form a unit the rank of a battalion, providing artillery support, radio reconnaissance. Our advantage is that we could form a deadly battalion of 700-800 men.<sup>2640</sup>

629. MILOŠEVIĆ directed that **STANIŠIĆ** command the consolidated Serb Forces, stating “Let Jovica’s men take this over.”<sup>2641</sup> In addition to commanding Pauk, **STANIŠIĆ** directed logistics to arm and supply the forces,<sup>2642</sup> and required **SIMATOVIĆ** to assist him in establishing that command.<sup>2643</sup> MLADIĆ discussed the provision of men and weapons by **STANIŠIĆ** for Pauk with an unidentified interlocutor, who confirmed that ARKAN was “under Jovica”.<sup>2644</sup>

630. On 7 November 1994, en route to establishing the joint Pauk Command at Magarčevac, **STANIŠIĆ** and **SIMATOVIĆ** stopped in Banja Luka.<sup>2645</sup> **STANIŠIĆ** briefed senior VRS and RS-DB commanders, stating “he had provided forces strong enough to ensure the liberation of Velika Kladuša and Fikret ABDIĆ’s return there, but that he needed to synchronize this task with the forces of the VRS and SVK.”<sup>2646</sup> **STANIŠIĆ** stated that he was present “solely to direct armed combat” and coordinate with MARTIĆ.<sup>2647</sup>

631. **STANIŠIĆ**’s Pauk Command was located at the Magarčevac communication post, on Petrova Gora mountain in the Kordun region of RSK.<sup>2648</sup> Consistent with his role in the *vojna linija* and the Krajina parallel structure,<sup>2649</sup> **STANIŠIĆ**’s Pauk Command was a “parallel” command that usurped the role of the SVK Main Staff.<sup>2650</sup> The highest-level military, security and political leaders came to see **STANIŠIĆ** at Magarčevac<sup>2651</sup>—

<sup>2639</sup> [1D00037](#), p.81-99.

<sup>2640</sup> [1D00037](#), p.91.

<sup>2641</sup> [1D00037](#), p.93.

<sup>2642</sup> [P01947](#), p.1-2; [1D00037](#), p.99-101; [1D00057](#), p.73,206-208; KARANMladen:T.29-31(30-Jan-2020).

<sup>2643</sup> [1D00037](#), p.95

<sup>2644</sup> [P02963](#), p.5-6; MILOVANOVIĆManojlo:[P02935](#), T.15550-15553.

<sup>2645</sup> [P01947](#), p.1,3; [REDACTED].

<sup>2646</sup> [P01947](#), p.1,2,4; THEUNENSReynaud:T.55-56.

<sup>2647</sup> [P01947](#), p.1,2.

<sup>2648</sup> KARANMladen:T.53(28-Jan-2020); [P02939](#), p.1; [REDACTED].

<sup>2649</sup> Cross-reference Section [II.E.1\(a\)](#)-(b).

<sup>2650</sup> [P02939](#), p.1-3.

<sup>2651</sup> MILOVANOVIĆManojlo:[P02934](#), T.4389,4394-4395; [P02598](#), p.4,13; [P02597](#), p.1. See also SLIŠKOVIĆDejan:T.48(10-Jul-2018); SLIŠKOVIĆDejan:T.25-26(18-Jul-2018);



“[e]verybody came to him. He didn’t go to them.”<sup>2652</sup> NOVAKOVIĆ, SVK Commander of the Pauk operation,<sup>2653</sup> reported to STANIŠIĆ.<sup>2654</sup>

632. SIMATOVIĆ was STANIŠIĆ’s direct subordinate during Pauk.<sup>2655</sup> As he stated at the time, “Jovica Stanišić arrived and I came with him.”<sup>2656</sup> SIMATOVIĆ implemented Pauk Command strategy on the ground.<sup>2657</sup> As STANIŠIĆ had stated at the planning meeting,<sup>2658</sup> the SerbianDB provided artillery support and radio reconnaissance for Pauk.<sup>2659</sup> SIMATOVIĆ commanded the SerbianDB’s provision of intelligence and radio reconnaissance.<sup>2660</sup>

633. SIMATOVIĆ’s authority extended beyond that of a SerbianDB 2<sup>nd</sup> Administration official. He engaged in military command and issued orders for artillery support, completely unrelated to communications intelligence.<sup>2661</sup> He conducted briefings attended by NOVAKOVIĆ<sup>2662</sup> and MILOVANOVIĆ<sup>2663</sup> and attended Command meetings regardless of STANIŠIĆ’s presence.<sup>2664</sup> He ordered and received reports from the Unit,<sup>2665</sup> the SDG,<sup>2666</sup> and the Scorpions,<sup>2667</sup> [REDACTED].<sup>2668</sup>

634. SIMATOVIĆ accompanied the Unit at the frontline to observe combat progress,<sup>2669</sup> reported events in the field to the operational Pauk Command,<sup>2670</sup> was

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SLIŠKOVIĆDejan:[P02538](#), para.8; [REDACTED]; SLIŠKOVIĆDejan:T.73(11-Jul-2018);  
 SLIŠKOVIĆDejan:[P02541](#), para.12; SLIŠKOVIĆDejan:T.85-86(11-Jul-2018);  
 NOVAKOVIĆRadenko:T.52-53,58-59(18-Sep-2019); [REDACTED].

<sup>2652</sup> SLIŠKOVIĆDejan:T.73(11-Jul-2018).

<sup>2653</sup> [P03465](#); THEUNENSReynaud:[P01980](#), p.311; [REDACTED].

<sup>2654</sup> [P00820](#), p.17,19; [P03465](#); THEUNENSReynaud:T.55-56(6-Mar-2018).

<sup>2655</sup> BABIĆMilan:[P01246](#), T.13244-13245; [REDACTED]; [REDACTED]; THEUNENSReynaud:T.33-34(22-Mar-2018); [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.65(11-Jul-2018); SLIŠKOVIĆDejan:T.5,7-8(18-Jul-2018); [REDACTED].

<sup>2656</sup> MILOVANOVIĆManojlo:[P02934](#), T.4391-4392; [P00059](#)(00:23:05-00:25:33), p.35.

<sup>2657</sup> [REDACTED]; THEUNENSReynaud:T.58(6-Mar-2018).

<sup>2658</sup> [ID00037](#), p.9.

<sup>2659</sup> KARANMladen:T.52-54(28-Jan-2020).

<sup>2660</sup> KARANMladen:T.54(28-Jan-2020); KARANMladen:T.15(30-Jan-2020); [REDACTED].

<sup>2661</sup> [P00820](#), p.11; THEUNENSReynaud:T.36(22-Mar-2018).

<sup>2662</sup> [P00820](#), p.53; [REDACTED].

<sup>2663</sup> MILOVANOVIĆManojlo:[P02934](#), T.4394-4395.

<sup>2664</sup> [P00820](#), p.53.

<sup>2665</sup> [P00820](#), p.11,13; [REDACTED].

<sup>2666</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2667</sup> STOPARIĆGoran:[P00796](#), para.89; STOPARIĆGoran:T.5(8-Nov-2017); [REDACTED].

<sup>2668</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>2669</sup> MILOVANOVIĆManojlo:[P02934](#), T.4391-4392.

<sup>2670</sup> [P00820](#), p.23.

engaged in Pauk administration,<sup>2671</sup> and was apprised of matters concerning personnel.<sup>2672</sup>

b. The Accused deployed and commanded SerbianDB units participating in Pauk

635. The Accused deployed all three SerbianDB units in November 1994—the Unit, SDG, and Scorpions<sup>2673</sup>—to Pauk shortly after **STANIŠIĆ** had pledged to send **SIMATOVIĆ** with “manpower”.<sup>2674</sup> The Unit was under **BOŽOVIĆ<sub>(DB)</sub>**<sup>2675</sup> and [REDACTED], (TG 3),<sup>2676</sup> while **ARKAN**’s SDG and **BOCA<sub>(DB)</sub>**’s Scorpions were under **Milorad ULEMEK** aka **LEGIJA<sub>(DB)</sub>**<sup>2677</sup> (TG 2).<sup>2678</sup> [REDACTED].<sup>2679</sup>

636. [REDACTED].<sup>2680</sup> [REDACTED],<sup>2681</sup> [REDACTED]<sup>2682</sup> [REDACTED],<sup>2683</sup> [REDACTED].<sup>2684</sup> [REDACTED], members of the SDG and the Unit [REDACTED].<sup>2685</sup> Both units traveled in a convoy led by **SIMATOVIĆ** across international borders from Serbia, into BiH, and on to Croatia.<sup>2686</sup>

637. When approximately 150 Scorpions deployed for Pauk a second time in April 1995<sup>2687</sup>—to Velika Kladuša—[REDACTED].<sup>2688</sup> On 6 April, **STANIŠIĆ** informed

<sup>2671</sup> [P00820](#), p.22.

<sup>2672</sup> [P00820](#), p.26; [P02598](#), p.26.

<sup>2673</sup> [REDACTED]; **STOPARIĆGoran**:[P00796](#), para.89-90; **THEUNENSReynaud**:T.37(14-Mar-2018).

<sup>2674</sup> [1D00037](#), p.86,91,95-96. *See also* [P01947](#), p.1-2; **THEUNENSReynaud**:T.55-56(6-Mar-2018).

<sup>2675</sup> [REDACTED]; [REDACTED]; **STOPARIĆGoran**:[P00796](#), para.89; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2676</sup> [P02557](#); **KARANMladen**:T.11(30-Jan-2020); [REDACTED]; [2D00219](#); [2D00220](#); [P01125](#), p.1; **THEUNENSReynaud**:[P01980](#), p.188; [REDACTED].

<sup>2677</sup> **STOPARIĆGoran**:T.5-7(8-Nov-2017); **STOPARIĆGoran**:[P00796](#), para.89-90,95; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P02415](#)(00:03:48-00:04:45)(00:05:12-00:09:30); [REDACTED]; [REDACTED]; [P02415](#)(01:11:27-01:11:29:10); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; **THEUNENSReynaud**:T.53(6-Mar-2018); [P00820](#), p.10,13,53,104,111.

<sup>2678</sup> **KARANMladen**:T.11(30-Jan-2020); [REDACTED]; [P01123](#); [REDACTED]; [P01125](#), p.1; [REDACTED]; [REDACTED].

<sup>2679</sup> [REDACTED]; [REDACTED].

<sup>2680</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2681</sup> [REDACTED]; [REDACTED].

<sup>2682</sup> [REDACTED].

<sup>2683</sup> [REDACTED].

<sup>2684</sup> [REDACTED].

<sup>2685</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2686</sup> [REDACTED]; [REDACTED]; **SLIŠKOVIĆDejan**:T.23(10-Jul-2018); **SLIŠKOVIĆDejan**:[P02541](#), para.10; **SLIŠKOVIĆDejan**:[P02538](#), para.6; [REDACTED]; [REDACTED]; **THEUNENSReynaud**:T.49-50(13-Mar-2018).

<sup>2687</sup> [REDACTED]; [REDACTED]; [P00820](#), p.101.

<sup>2688</sup> [REDACTED]; [P02415](#)(00:24:00-00:26:00); [P00240](#); [REDACTED]; **RFJ-066**:T.29(10-Jul-2017).

MLADIĆ: “I sent 150 men from Slavonija through Pauk...the crossing had to be done quietly”.<sup>2689</sup>

638. The Unit, SDG, and Scorpions operated “side by side in close co-operation”, under the overall command of **STANIŠIĆ** and **SIMATOVIĆ**,<sup>2690</sup> and coordinated with other Serb Forces in Pauk.<sup>2691</sup> The SerbianDB units’ role was to seize a target location—particularly where ABDIĆ’s forces had been unsuccessful—then hand it over to ABDIĆ’s forces.<sup>2692</sup> After the initial combat, LEGIJA<sub>(DB)</sub>, BOŽOVIĆ<sub>(DB)</sub>, and their Tactical Groups coordinated to train members of ABDIĆ’s army.<sup>2693</sup> The Unit provided ABDIĆ’s army with equipment and uniforms and trained them for battle.<sup>2694</sup> [REDACTED].<sup>2695</sup>

639. The SerbianDB units’ Pauk deployment was covert.<sup>2696</sup> [REDACTED]<sup>2697</sup> — [REDACTED].<sup>2698</sup> [REDACTED]<sup>2699</sup> [REDACTED].<sup>2700</sup> [REDACTED] casualties<sup>2701</sup> were reported to the SMUP<sup>2702</sup> [REDACTED].<sup>2703</sup>

640. BOŽOVIĆ<sub>(DB)</sub> and LEGIJA<sub>(DB)</sub> regularly went to Magarčevac, receiving orders from **STANIŠIĆ** and **SIMATOVIĆ**.<sup>2704</sup> Scorpions commander BOCA<sub>(DB)</sub> was also subordinate to both Accused,<sup>2705</sup> and BOCA<sub>(DB)</sub> told the Scorpions about his meetings

<sup>2689</sup> [1D00057](#), p.72-73.

<sup>2690</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.69,83-84(11-Jul-2018); [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.77-79(11-Jul-2018); STOPARIĆGoran:[P00796](#), para.77; STOPARIĆGoran:T.2(8-Nov-2017); [P00820](#), p.10-11,13,17,53,56,58,101,103-107; [2D00220](#); [P01123](#).

<sup>2691</sup> [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:[P00796](#), para.89.

<sup>2692</sup> [REDACTED]; [REDACTED]; [P00820](#), p.5; [REDACTED]; [REDACTED].

<sup>2693</sup> Cross-reference Section [II.E.4\(e\)\(i\)](#).

<sup>2694</sup> Cross-reference Section [II.E.4\(e\)\(i\)](#).

<sup>2695</sup> [REDACTED]; [P01126](#); [P01127](#).

<sup>2696</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.30(18-Jul-2018); SLIŠKOVIĆDejan:[P02538](#), para.14; ROBERTSIvor:T.81,85-86(15-Oct-2019).

<sup>2697</sup> [REDACTED]; [REDACTED].

<sup>2698</sup> [REDACTED]; [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>2699</sup> [REDACTED]; [REDACTED].

<sup>2700</sup> [REDACTED]; [REDACTED].

<sup>2701</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2702</sup> [P03422](#).

<sup>2703</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2704</sup> [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.69,83-84(11-Jul-2018); [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.77-79(11-Jul-2018); STOPARIĆGoran:[P00796](#), para.89.

<sup>2705</sup> STOPARIĆGoran:[P00796](#), para.77,87; STOPARIĆGoran:T.2(8-Nov-2017); STOPARIĆGoran:T.5(8-Nov-2017; [REDACTED]; [P02553](#).

with LEGIJA<sub>(DB)</sub> and **SIMATOVIĆ**.<sup>2706</sup> [REDACTED].<sup>2707</sup> The Pauk Operational Diary records that the SerbianDB units operating in different areas in the Cazin Krajina—led by BOZOVIĆ<sub>(DB)</sub>, LEGIJA<sub>(DB)</sub>, and BOCA<sub>(DB)</sub>—were under **SIMATOVIĆ**'s direct command.<sup>2708</sup>

641. FILIPOVIĆ<sub>(DB)</sub> and senior Unit members regularly visited Magarčevac from the Pauk battlefield, including RAIĆ<sub>(DB)</sub>,<sup>2709</sup> [REDACTED],<sup>2710</sup> [REDACTED], and [REDACTED].<sup>2711</sup> On **STANIŠIĆ**'s order, several Unit members provided security for both Accused at Magarčevac.<sup>2712</sup> The SerbianDB funded and equipped the Scorpions during Pauk,<sup>2713</sup> and [REDACTED].<sup>2714</sup>

c. The SerbianDB units committed crimes during Pauk

642. The SerbianDB units perpetrated crimes against non-Serbs during Pauk. The Unit fired indiscriminately on unarmed civilians and used mortars on civilian targets.<sup>2715</sup> The SerbianDB units detained and abused non-Serbs at a number of detention centres.<sup>2716</sup> SDG [REDACTED],<sup>2717</sup> and [REDACTED].<sup>2718</sup> [REDACTED],<sup>2719</sup> and [REDACTED].<sup>2720</sup> The Scorpions beat and mistreated prisoners—breaking teeth, ribs, and vertebrae, shoving their faces into toilets filled with feces,<sup>2721</sup> and [REDACTED].<sup>2722</sup>

<sup>2706</sup> STOPARIĆGoran:[P00796](#), para.89.

<sup>2707</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00233](#), p.11.

<sup>2708</sup> [P00820](#), p.11,17,22-23,26,53,56,58,101.

<sup>2709</sup> [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.4(18-Jul-2018); [REDACTED]. [REDACTED], [REDACTED]; [REDACTED]; [P00240](#); [REDACTED]; [REDACTED].

<sup>2710</sup> [REDACTED].

<sup>2711</sup> [REDACTED].

<sup>2712</sup> [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:[P02538](#), para.7; SLIŠKOVIĆDejan:T.27-28(11-Jul-2018); [REDACTED].

<sup>2713</sup> STOPARIĆGoran:[P00796](#), para.73-74,78,87; [REDACTED]; STOPARIĆGoran:T.59-60(7-Nov-2017); STOPARIĆGoran:T.24(9-Nov-201). *See also* [REDACTED]; [REDACTED].

<sup>2714</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>2715</sup> [REDACTED]; [REDACTED]. *See* AnnexE.2.

<sup>2716</sup> *See* SLIŠKOVIĆDejan:[P02538](#), para.15; SLIŠKOVIĆDejan:T.35-36,44-45(10-Jul-2018); SLIŠKOVIĆDejan:T.15(11-Jul-2018); SLIŠKOVIĆDejan:T.36-37(18-Jul-2018).

<sup>2717</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>2718</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>2719</sup> [REDACTED].

<sup>2720</sup> [REDACTED].

<sup>2721</sup> JURIĆFrano:[P01211](#), para.8,12-14.

<sup>2722</sup> [REDACTED]; [REDACTED].

(iii) Trnovo/Treskavica

643. In June-July 1995, the Accused deployed MIJOVIĆ<sub>(DB)</sub> to command the Scorpions, a SDG detachment and the Vukovar SUP *Plavi* detachment, with a small contingent of the Unit, in joint operations with the RS-MUP and VRS near Trnovo, in the Treskavica mountains outside Sarajevo.<sup>2723</sup> These operations coincided with the VRS assault on the protected enclaves of Srebrenica and Žepa in eastern BiH. During this deployment, the Scorpions executed six Muslim men and boys from the Srebrenica area and the SDG brutalised prisoners, furthering the CCP.

644. The Trnovo/Treskavica operations aimed to separate Serbs from non-Serbs (First Strategic Goal), take the Drina valley (Third Strategic Goal), and bolster the Sarajevo front (Fifth Strategic Goal). The Scorpions were briefed that part of the operation's goal was to create the impression of an attack in the Sarajevo area to draw Muslim forces from the Drina valley, to enable MLADIĆ's troops to take the "safe areas"<sup>2724</sup> of Srebrenica, Žepa, and Goražde.<sup>2725</sup>

a. The Accused deployed SerbianDB units in joint operations around Trnovo and Treskavica

645. Preparatory meetings in advance of the Trnovo deployment were held during May-June 1995. Sometime in May 1995, BADŽA hosted a meeting at the SMUP, attended by MRGUD<sub>(DB)</sub>, KOJIĆ<sub>(DB)</sub>, ARKAN, BOCA<sub>(DB)</sub>—the same individuals who that month had established a staff together in Erdut under the "direct patronage" of, and with a direct line to, STANIŠIĆ and BADŽA.<sup>2726</sup> [REDACTED].<sup>2727</sup> The Accused and their SerbianDB associates then set the deployments in motion: [REDACTED];<sup>2728</sup> MRGUD<sub>(DB)</sub> deployed the Scorpions;<sup>2729</sup> [REDACTED].<sup>2730</sup>

<sup>2723</sup> [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:[P00796](#), para.97-99; [P02356](#); [P01081](#), p.46,105.

<sup>2724</sup> See AF1176.

<sup>2725</sup> STOPARIĆGoran:[P00796](#), para.97-99; STOPARIĆGoran:T.8(8-Nov-2017); STOPARIĆGoran:T.67-68(30-Nov-2017); [REDACTED]. See also [P01937](#); THEUNENSReynaud:T.25(6-Mar-2018); [1D00057](#), p.189-190; [REDACTED]; [REDACTED]; [P03540](#).

<sup>2726</sup> [P02349](#), p.1,3; [P02350](#), p.1; [REDACTED].

<sup>2727</sup> [REDACTED].

<sup>2728</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>2729</sup> [REDACTED]; [REDACTED]; [2D00093](#), p.11-12. Cross-reference Section [II.D.1\(b\)](#); Section [II.D.2\(b\)](#).

<sup>2730</sup> [REDACTED].

646. BOCA<sub>(DB)</sub> testified in his own trial that MRGUD<sub>(DB)</sub> and SVK General Dušan LONČAR gave him the order to deploy for Trnovo, at a meeting attended by ARKAN and KOJIĆ<sub>(DB)</sub>.<sup>2731</sup> Although the Scorpions received the formal deployment order from MRGUD<sub>(DB)</sub> and LONČAR,<sup>2732</sup> “the State Security Service from Belgrade decided on the when, where and how, and Lončar’s order was just a formality.”<sup>2733</sup>

647. The SDG<sup>2734</sup> and Scorpions<sup>2735</sup> deployed to Trnovo at the end of June 1995. The SDG deployed [REDACTED] from the new training camp [REDACTED] in Erdut,<sup>2736</sup> [REDACTED].<sup>2737</sup> [REDACTED], [REDACTED].<sup>2738</sup> The SMUP then enabled the Scorpions’ passage to Trnovo, with their arms and supplies, across the borders through Serbia into BiH.<sup>2739</sup> The Scorpions reached the command centre on the Jahorina mountains on [REDACTED] June 1995, before deploying onward to Trnovo.<sup>2740</sup>

648. En route to Trnovo [REDACTED]<sup>2741</sup> [REDACTED].<sup>2742</sup>

649. BOCA<sub>(DB)</sub> boasted about having a meeting with **SIMATOVIĆ** at the joint command based at the Jahorina Hotel on Mt. Jahorina.<sup>2743</sup> **SIMATOVIĆ**’s subordinate BOŽOVIĆ<sub>(DB)</sub> and SDG members were also present.<sup>2744</sup> MIJOVIĆ<sub>(DB)</sub><sup>2745</sup> commanded the Scorpions,<sup>2746</sup> SDG (known as the Kajman detachment)<sup>2747</sup> and *Plavi* unit, which were

<sup>2731</sup> [2D00093](#), p.11-12. *Cross-reference* Section [II.D.1\(b\)](#).

<sup>2732</sup> [2D00093](#), p.11-12.

<sup>2733</sup> STOPARIĆGoran:T.57,66-67(30-Nov-2017).

<sup>2734</sup> [REDACTED].

<sup>2735</sup> STOPARIĆGoran:T.9(8-Nov-2017); [P00821](#), p.2; [P00802](#)(00:05:10); [REDACTED]; [REDACTED]; [REDACTED]; [P03525](#), p.2. *See* AF1234.

<sup>2736</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *See also* [P02350](#), p.1; [P02349](#), p.1; [REDACTED]; [REDACTED].

<sup>2737</sup> [REDACTED]; [REDACTED].

<sup>2738</sup> [REDACTED]; [REDACTED].

<sup>2739</sup> STOPARIĆGoran:[P00796](#), para.107; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2740</sup> [P00802](#)(00:05:10); [REDACTED]; [REDACTED]; [REDACTED]; [P00821](#), p.2.

<sup>2741</sup> [REDACTED].

<sup>2742</sup> [REDACTED]; [REDACTED].

<sup>2743</sup> [REDACTED]; STOPARIĆGoran:[P00796](#), para.97-98.

<sup>2744</sup> [REDACTED]; STOPARIĆGoran:T.7(8-Nov-2017)(“KOBAC” is BOŽOVIĆ). *Cross-reference* AnnexA.

<sup>2745</sup> *Cross-reference* AnnexA. *See also* [P02356](#); [REDACTED].

<sup>2746</sup> [REDACTED]; [P01081](#), p.15,22-23,27,46,104-105.

<sup>2747</sup> [REDACTED]; [REDACTED]; [REDACTED]; NOVAKOVIĆStojan:T.54(6-Oct-2020); NOVAKOVIĆStojan:T.17-18(8-Oct-2020); [P03858](#), p.7; [P03525](#), p.2; [REDACTED]; [P03526](#), p.1; [P02333](#); STEVANOVIĆObad:T.42(29-Sep-2020); [P01081](#), p.103-105.

collectively known to the VRS<sup>2748</sup> and the RS-MUP<sup>2749</sup> as SMUP forces.<sup>2750</sup> [REDACTED],<sup>2751</sup> [REDACTED].<sup>2752</sup>

650. **SIMATOVIĆ**'s witness **STEVANOVIĆ** made clear that these SMUP units were SerbianDB by disavowing that they were connected to the SerbianJB and categorically denying any SerbianJB involvement in the Trnovo/Treskavica operation<sup>2753</sup> between late June and late July 1995.<sup>2754</sup> The SMUP forces coordinated with RS-MUP forces, under the operational direction of Tomislav KOVAČ of the RS-MUP.<sup>2755</sup> **MLADIĆ** approved air evacuation from Trnovo for Unit members.<sup>2756</sup> The SerbianDB paid [REDACTED]<sup>2757</sup> and the Scorpions<sup>2758</sup> during their deployment to the Trnovo/Treskavica operation.

b. **MIJOVIĆ**<sub>(DB)</sub>'s units were diverted to the Srebrenica area, where the Scorpions murdered six Srebrenica Muslims

651. While the units under **MIJOVIĆ**<sub>(DB)</sub> were in Trnovo, the VRS offensive on Srebrenica began in earnest on 6 July 1995.<sup>2759</sup> On 9 July 1995, **KARADŽIĆ** issued an order authorising the VRS to capture the town of Srebrenica.<sup>2760</sup> Around 9 July, **DERONJIĆ** saw **STANIŠIĆ** meeting with **KARADŽIĆ** in Pale, and deduced that they had been discussing Srebrenica.<sup>2761</sup> Other members of the Unit were also present around eastern BiH during this period.<sup>2762</sup>

<sup>2748</sup> [P03690](#); [P02416](#), para.2-3.

<sup>2749</sup> [P00821](#), p.2; [P02332](#); [P03525](#), p.2; [P03526](#), p.1; [P02333](#); [P03527](#); [P03528](#); [P03530](#); [P03532](#); [P03533](#); [P03535](#), p.1; [P02338](#); [P00822](#); [P03537](#); [P03539](#).

<sup>2750</sup> [P02333](#); [P03525](#), p.2; [P02416](#), para.2-3; [P00822](#); [P03526](#), p.1; [P03537](#).

<sup>2751</sup> [REDACTED].

<sup>2752</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>2753</sup> **STEVANOVIĆ**Obrad:T.48,50-52,62-68(30-Sep-2020); **STEVANOVIĆ**Obrad:T.40-42(29-Sep-2020).

<sup>2754</sup> [P00821](#), p.2; [P02356](#); [P00822](#).

<sup>2755</sup> [P03526](#), p.1; [P03527](#); [P03525](#), p.2; [P03532](#); [P02333](#); [P03537](#); [P02417](#); [P03529](#); [P03528](#); [P03530](#); [P03533](#); [P03535](#), p.1; [P03539](#); [P01081](#), p.6.

<sup>2756</sup> [P03690](#); **STEVANOVIĆ**Obrad:T.68(30-Sep-2020).

<sup>2757</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>2758</sup> See **STOPARIĆ**Goran:[P00796](#), para.73-74,78; [REDACTED]; **STOPARIĆ**Goran:T.59-60(7-Nov-2017); **STOPARIĆ**Goran:T.24(9-Nov-2017). See also [REDACTED]; [REDACTED].

<sup>2759</sup> Cross-reference Section [III.C.5](#).

<sup>2760</sup> AF1186; AF1187; AF1189.

<sup>2761</sup> **DERONJIĆ**Miroslav:[P01717](#), para.172-175; **DERONJIĆ**Miroslav:[P01719](#), T.29635,29668-29670.

<sup>2762</sup> [P00855](#), p.2-3; **DERONJIĆ**Miroslav:[P01717](#), para.207.



652. The VRS entered Srebrenica town on 11 July 1995<sup>2763</sup> and began killing the Muslim men and boys in orchestrated mass executions on 13 July 1995.<sup>2764</sup> While his units were in Trnovo, MIJOVIĆ<sub>(DB)</sub> went to find MLADIĆ in Bratunac, near Srebrenica, between 12 and 14 July 1995.<sup>2765</sup> Around that time, BOCA<sub>(DB)</sub> received an order to provide vehicles to Srebrenica.<sup>2766</sup> One of the buses he provided transported six Muslim prisoners back to the Scorpions in Trnovo, where the Scorpions murdered them.<sup>2767</sup>

653. In a final confirmation that the Accused were behind the Trnovo/Treskavica deployment, on 19 July 1995, MIJOVIĆ<sub>(DB)</sub> informed the RSK-MUP that the Unit (“ATD” unit) was pulling out of the Trnovo Sector on the following day.<sup>2768</sup>

(iv) ARK Operations

654. Six weeks after the Trnovo/Treskavica operation, in September 1995, the Accused and other JCE members deployed Serb Forces, including the Unit, SerbianJB-PJMs, and SDG, into the ARK, to defend previously cleansed territory and drive out the remaining non-Serbs.<sup>2769</sup> ARKAN’s SDG, in particular, advanced the CCP by detaining, [REDACTED], persecuting, and murdering the remaining Muslims in Sanski Most.<sup>2770</sup>

655. By September 1995, combined Muslim and Croat forces were advancing on the ARK region. Faced with this and mounting desertion,<sup>2771</sup> VRS and RS-MUP forces were in retreat,<sup>2772</sup> threatening the loss of RS territory and jeopardising the First and Second Strategic Goals.<sup>2773</sup> The SerbianDB coordinated various SMUP forces that **STANIŠIĆ**, **SIMATOVIĆ**, and **BADŽA** then dispatched to deal with the situation in ARK.<sup>2774</sup>

<sup>2763</sup> See AF1190.

<sup>2764</sup> See AF1210; AF1213.

<sup>2765</sup> DERONJIĆMiroslav:[P01717](#), para.207.

<sup>2766</sup> See AF1238; [REDACTED]. Cross-reference Section [III.C.5](#).

<sup>2767</sup> Cross-reference Section [III.C.5](#).

<sup>2768</sup> [P02356](#).

<sup>2769</sup> MILOVANOVIĆManojlo:[P02935](#), T.15522,15527,15558; [REDACTED]; [P01960](#), p.78-79. See also [2D00078](#), p.1; [2D00076](#).

<sup>2770</sup> Cross-reference Section [III.C.6](#). See also [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2771</sup> MILOVANOVIĆManojlo:[P02934](#), T.4529.

<sup>2772</sup> GREKULOVIĆSrđan:[1D00410](#), T.15215; [REDACTED]. See also GREKULOVIĆSrđan:T.37,48(8-Oct-2019); GREKULOVIĆSrđan:T.26(10-Oct-2019).

<sup>2773</sup> Cross-reference Section [II.F.4\(a\)\(ii\)c](#). [P01249](#), p.9-11; [P01591](#). See also DONIARRobert:T.64,66-67(1-Feb-2018).

<sup>2774</sup> GREKULOVIĆSrđan:[1D00409](#), para.6; GREKULOVIĆSrđan:[1D00410](#), T.15250; [P00852](#), p.1,3-4,6. See also [P02872](#), p.8.

- FILIPOVIĆ<sub>(DB)</sub> was deployed to coordinate the SMUP forces, comprising the Unit, SerbianJB-PJM, and SDG;<sup>2775</sup>
- BOŽOVIĆ<sub>(DB)</sub> was deployed to command a contingent of the Unit;<sup>2776</sup>
- ARKAN'S SDG was deployed to act as "police" so that the RS police could go to the front;<sup>2777</sup>
- A SerbianDB operative was assigned to accompany the SerbianJB-PJM commander.<sup>2778</sup>

656. The CIA concluded the SerbianDB played a leading role in SMUP operations in BiH and Croatia, including the ARK operation.<sup>2779</sup> SerbianJB-PJM commander Srdan GREKULOVIĆ agreed that the CIA was correct regarding the deployment of the SMUP forces to the ARK.<sup>2780</sup> Although he disagreed that **SIMATOVIĆ** was in overall command,<sup>2781</sup> he nonetheless testified that **SIMATOVIĆ**'s subordinate, FILIPOVIĆ<sub>(DB)</sub>, coordinated all SMUP forces during the ARK operation.<sup>2782</sup>

a. The SerbianJB-PJM and the Unit were deployed under SerbianDB command

657. GREKULOVIĆ commanded the SerbianJB-PJMs in the field.<sup>2783</sup> BADŽA ordered their deployment in late-August 1995 and their task was to assume regular police duties.<sup>2784</sup> GREKULOVIĆ was instructed that co-ordination of the SMUP forces would be through FILIPOVIĆ<sub>(DB)</sub> and the SerbianDB.<sup>2785</sup> To maintain SerbianDB control,

<sup>2775</sup> [P03541](#); GREKULOVIĆSrdan:T.69(9-Oct-2019); GREKULOVIĆCSrdjan:[1D00409](#), para.18; GREKULOVIĆSrdan:[1D00410](#), T.15250; GREKULOVIĆSrdjan:T.5-6(10-Oct-2019); [P01960](#),p.78-79.

<sup>2776</sup> [P01960](#), p.78-79; MILOVANOVIĆManojlo:[P02935](#), T.15522,15527,15558; [REDACTED]; [REDACTED]; [REDACTED]. See also [P03129](#); GREKULOVIĆSrdan:T.8(10-Oct-2019); [P00852](#),p.6.

<sup>2777</sup> [P01960](#), p.78-79; [P01960](#), p.49,52-53.

<sup>2778</sup> GREKULOVIĆSrdan:T.2,4(10-Oct-2019).

<sup>2779</sup> [P00852](#), p.1,3-4,6.

<sup>2780</sup> GREKULOVIĆSrdan:T.26(10-Oct-2019).

<sup>2781</sup> GREKULOVIĆSrdan:T.26(10-Oct-2019).

<sup>2782</sup> GREKULOVIĆSrdan:T.69(9-Oct-2019); GREKULOVIĆSrdjan:[1D00409](#), para.18; GREKULOVIĆSrdan:[1D00410](#), T.15233,15250; GREKULOVIĆSrdan:T.3-4(10-Oct-2019); [P03541](#).

<sup>2783</sup> GREKULOVIĆSrdan:T.49(9-Oct-2019); GREKULOVIĆSrdan:[1D00409](#), para.8; GREKULOVIĆSrdan:[1D00410](#), T.15215.

<sup>2784</sup> GREKULOVIĆSrdan:[1D00409](#), para.10; GREKULOVIĆSrdan:[1D00410](#), T.15217,15219; GREKULOVIĆSrdan:T.50(9-Oct-2019).

<sup>2785</sup> GREKULOVIĆSrdan:[1D00410](#), T.15247-15250; STEVANOVIĆObrad:T.22(23-Sep-2020); STEVANOVIĆObrad:T.16-18(1-Oct-2020).

FILIPOVIĆ<sub>(DB)</sub> assigned one of his subordinates to accompany GREKULOVIĆ “all the time”<sup>2786</sup> to ensure that the SerbianJB-PJMs “carried out the tasks for which they were deployed.”<sup>2787</sup> FILIPOVIĆ<sub>(DB)</sub> coordinated directly with the acting RS-MUP Minister, KOVAČ.<sup>2788</sup> This level of direct oversight confirms the SerbianDB’s leadership role in the campaign to preserve the objectives of the CCP in the ARK region.

658. Shortly after KARADŽIĆ informed MILOVANOVIĆ that SMUP units would arrive, FILIPOVIĆ<sub>(DB)</sub> and BOŽOVIĆ<sub>(DB)</sub> arrived to discuss details of their deployment.<sup>2789</sup> On 22 September 1995, MILOVANOVIĆ reported to MLADIĆ that “a team from the SerbianDB appeared here (FILIPOVIĆ, BOZOVIĆ, as well as KIJAC and KOVAČ...).”<sup>2790</sup> Unit members arrived as part of the SerbianDB team under FILIPOVIĆ<sub>(DB)</sub> and BOZOVIĆ<sub>(DB)</sub>.<sup>2791</sup>

b. STANIŠIĆ and SIMATOVIĆ deployed the SDG to ARK

659. In late September 1995, STANIŠIĆ deployed some 300-400 SDG personnel to ARK, where they operated under the RS-MUP. ARKAN and the SDG committed grievous crimes against Muslims in Sanski Most, culminating in two mass killings in the Sanski Most hamlets of Trnova and Sasina.<sup>2792</sup> STANIŠIĆ personally ordered this deployment.

660. On 22 September 1995, at a VRS Main Staff meeting in Banja Luka, MILOVANOVIĆ reported that a team from the SerbianDB had appeared “here,” and that BOŽOVIĆ<sub>(DB)</sub> stated that “300 Arkan’s volunteers arrived and were put into the RS MUP.”<sup>2793</sup>

661. On 29 September, KARADŽIĆ confirmed that STANIŠIĆ deployed the SDG, informing MLADIĆ that STANIŠIĆ “gave 300 of his men and the US is begrudging us

<sup>2786</sup> GREKULOVIĆSrdan:T.2,4(10-Oct-2019).

<sup>2787</sup> GREKULOVIĆSrdan:[1D00410](#), T.15233; GREKULOVIĆSrdan:T.3-4(10-Oct-2019). *See also* [P03541](#).

<sup>2788</sup> [P03541](#); GREKULOVIĆSrdan:T.4-5(10-Oct-2019); STEVANOVIĆObrad:T.18(1-Oct-2020); [P01960](#), p.53.

<sup>2789</sup> MILOVANOVIĆManojlo:[P02935](#), T.15522,15527,15558. *See* STEVANOVIĆObrad:T.16-17,19-20(1-Oct-2020).

<sup>2790</sup> [P01960](#), p.53. *See also* [P02872](#), p.8.

<sup>2791</sup> [REDACTED]; GREKULOVIĆSrdan:T.6(10-Oct-2019); [P03129](#); GREKULOVIĆSrdan:T.8(10-Oct-2019); STEVANOVIĆObrad:T.29(23-Sep-2020); MILOVANOVIĆManojlo:[P02935](#), T.15522,15527,15558. *See also* [P02872](#), p.8.

<sup>2792</sup> *Cross-reference* Section [III.C.6](#).

<sup>2793</sup> [P01960](#), p.49,52-53 *See also* MILOVANOVIĆManojlo:[P02935](#), T.15522-15527.

for having advertised Arkan.”<sup>2794</sup> Clearly, the 300 men “given” by **STANIŠIĆ**, were the same “300 Arkan’s volunteers” placed into the RS-MUP as reported by **BOŽOVIĆ<sub>(DB)</sub>**.

662. A day later, **STANIŠIĆ** confirmed the placement of the SDG into the RS-MUP, informing **PERIŠIĆ** and **MLADIĆ**, “ARKAN has embedded himself there, we sent 400 people. As far as I have been informed this helped at Sanski Most and Novi Grad.”<sup>2795</sup> The personnel sent by **STANIŠIĆ** who “helped at Sanski Most and Novi Grad” were not SerbianJB-PJM personnel. The SerbianJB-PJM commander affirmed that his units did not assist the VRS at Sanski Most, Novi Grad, or anywhere else.<sup>2796</sup>

663. Whether the actual figure is 300 or 400 is of no import; these accounts all confirm that **STANIŠIĆ** deployed a significant contingent of ARKAN’s SDG to Sanski Most. This is supported by other witnesses,<sup>2797</sup> as well as documentary evidence showing that SDG members deployed in the Banja Luka operation received unemployment and health insurance payments from the SerbianDB, and were [REDACTED].<sup>2798</sup>

664. **STANIŠIĆ**, however, was angry that the RS were not discrete in their use of ARKAN and his men, thus attracting censure from the United States.<sup>2799</sup> Nevertheless, there were no complaints about how his men carried out their assignments. On 3 October 1995—after the SDG had killed scores of non-Serbs—**FILIPOVIĆ<sub>(DB)</sub>** informed **MLADIĆ** that ARKAN’s men were “doing a good job”.<sup>2800</sup>

665. [REDACTED],<sup>2801</sup> [REDACTED].<sup>2802</sup> The SDG also took supplies from [REDACTED] for this operation.<sup>2803</sup>

666. During the ARK operations, ARKAN [REDACTED],<sup>2804</sup> [REDACTED].<sup>2805</sup> [REDACTED].<sup>2806</sup>

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<sup>2794</sup> [P01960](#), p.72.

<sup>2795</sup> [P01960](#), p.73.

<sup>2796</sup> GREKULOVIĆSrđan:T.12-13(10-Oct-2019).

<sup>2797</sup> RFJ-129:[P02505](#), T.18460; RFJ-129:T.15-16(3-Jul-2018); [REDACTED].

<sup>2798</sup> [2D00160](#), p.2-3; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].[REDACTED].

<sup>2799</sup> [P01960](#), p.72.

<sup>2800</sup> [P01960](#), p.78.

<sup>2801</sup> [REDACTED]; [REDACTED].

<sup>2802</sup> [REDACTED].

<sup>2803</sup> RFJ-150:T.19-20(22-May-2018); [REDACTED].

<sup>2804</sup> [REDACTED]; [REDACTED].

<sup>2805</sup> [REDACTED].

<sup>2806</sup> [REDACTED]; [REDACTED]; [REDACTED].

667. ARKAN ostensibly operated as an RS-MUP “special unit”, authorized by KARADŽIĆ.<sup>2807</sup> This was a widely-known fiction. In a conversation with KARADŽIĆ about ARKAN’s presence in Banja Luka, MLADIĆ described ARKAN as “pure MUP of Serbia”.<sup>2808</sup> GREKULOVIĆ, [REDACTED],<sup>2809</sup> was unaware that ARKAN was subordinated to the RS-MUP.<sup>2810</sup> The SDG wore NATO-style camouflage uniforms with red berets (rather than the uniform of the RS-MUP)<sup>2811</sup>—the same NATO-style uniform as worn by FILIPOVIĆ<sub>(DB)</sub> during this operation<sup>2812</sup> and typically worn by the Unit.<sup>2813</sup>

668. In their deployment, ARKAN’s men took part in operations with RS-MUP, VRS, and other units<sup>2814</sup> and rounded-up deserters.<sup>2815</sup> ARKAN coordinated closely with the Banja Luka DB Red Berets unit under Ljuban EĆIM<sub>(DB)</sub>, which also operated under the informal command of the Accused.<sup>2816</sup> ARKAN and the SDG committed a new wave of murders and persecution against the Muslims in Sanski Most.<sup>2817</sup> Alongside EĆIM, ARKAN gave a widely-broadcast television appearance with captured Muslim prisoners, who were never heard from again.<sup>2818</sup>

669. On 11 October 1995, at the SDG’s five-year anniversary celebration in Erdut, ARKAN’s deputy commended the SDG for having “saved Sanski Most and Novi Grad” fifteen days previously<sup>2819</sup>—corroborating STANIŠIĆ’s understanding.<sup>2820</sup>

670. MLADIĆ later described how BOŽOVIĆ<sub>(DB)</sub> and those who had accompanied ARKAN were like a “mafia”, who were responsible for “death camps” around the

<sup>2807</sup> [2D00161](#); [REDACTED]; [2D00160](#), p.2-3; [2D00078](#), p.1; [P01960](#), p.53.

<sup>2808</sup> [P02896](#), p.28-29. *See also* DONIARobert:[P01597](#), p.62.

<sup>2809</sup> [REDACTED]; [REDACTED].

<sup>2810</sup> GREKULOVIĆSrdan:T.58(9-Oct-2019).

<sup>2811</sup> [P02492](#)(00:04:16-00:04:44); GREKULOVIĆSrdan:T.9(10-Oct-2019); [P02494](#); [REDACTED].

<sup>2812</sup> GREKULOVIĆSrdan:T.6(10-Oct-2019).

<sup>2813</sup> GREKULOVIĆSrdan:T.31(8-Oct-2019); [REDACTED]; [REDACTED]; [REDACTED].

<sup>2814</sup> [REDACTED]; [REDACTED]; [2D00077](#); [P02493](#); [REDACTED]. *See also* [REDACTED].

<sup>2815</sup> [P01960](#), p.53; [2D00078](#), p.1; [2D00076](#).

<sup>2816</sup> [REDACTED]; [REDACTED]; [1D00125](#), p.1; [REDACTED]. *See also* [P03513](#), p.4; [1D00037](#), p.95; [P03681](#); NIELSENChristian:[P00850](#), para.912.

<sup>2817</sup> *Cross-reference* Section [III.C.6](#). *See also* [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2818</sup> [P02334](#), p.1-2; [P02335](#), p.2-3; [P02318](#), p.1; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2819</sup> [P02536](#), p.2.

<sup>2820</sup> [P01960](#), p.73.

Bosnian Krajina.<sup>2821</sup> He attributed their arrival to the SMUP, and indicated that some of them had been in “that group on Petrova Gora” during Pauk.<sup>2822</sup>

(v) SBWS Implementation 1995

671. With tensions increasing in 1995 as Croatia prepared to retake its territory, the implementation of the CCP there focused on preserving the ethnically cleansed Serb territory in Krajina and SBWS. The SerbianDB dispatched Unit members to prepare forces in Krajina,<sup>2823</sup> Baranja,<sup>2824</sup> and Western Srem,<sup>2825</sup> and provided the SDG with additional resources and a new facility in Erdut,<sup>2826</sup> as MILOŠEVIĆ steered RSK’s political negotiations.<sup>2827</sup> In May 1995, KOJIĆ<sub>(DB)</sub>, MRGUD<sub>(DB)</sub>, ARKAN, and BOCA<sub>(DB)</sub> formed a staff for the “salvation” of SBWS, headquartered in Erdut, reporting directly to STANIŠIĆ and BADŽA.<sup>2828</sup> After Operation Storm,<sup>2829</sup> the Accused consolidated their control in SBWS,<sup>2830</sup> deploying the Unit, SDG, and Scorpions together once again,<sup>2831</sup> in coordination with SerbianJB-PJMs.<sup>2832</sup>

672. In September 1995, FILIPOVIĆ<sub>(DB)</sub> and BOŽOVIĆ<sub>(DB)</sub> coordinated the three SerbianDB special units with other Serb Forces:<sup>2833</sup> MIJOVIĆ<sub>(DB)</sub><sup>2834</sup> in Baranja; LEGIJA<sub>(DB)</sub> in Slavonia; and Zvezdan JOVANOVIĆ<sub>(DB)</sub> in Western Srem, [REDACTED].<sup>2835</sup> The expanded SDG Erdut camp swelled with many Krajina Serbs who fled in Operation Storm,<sup>2836</sup> [REDACTED]<sup>2837</sup> to “re-educate” them and send them

<sup>2821</sup> [P02898](#), p.9. See [P01960](#), p.53,78; [P03157](#), p.1; [REDACTED]; [REDACTED].

<sup>2822</sup> [P02898](#), p.9; [REDACTED]; [REDACTED].

<sup>2823</sup> Cross-reference Section [II.D.2\(a\)\(v\)](#).

<sup>2824</sup> Cross-reference Section [II.D.2\(a\)\(v\)](#).

<sup>2825</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; RFJ-150:T.28(22-May-2018); RFJ-150:T.16(23-May-2018). Cross-reference Section [II.E.4\(e\)\(ii\)](#).

<sup>2826</sup> [REDACTED]; [P00842](#), p.2; [P02350](#), p.1; [REDACTED].

<sup>2827</sup> [P01317](#); BABIĆMilan:[P01246](#), T.13124-13125,13235-13236,13240-13241,13257-13260,13605-13606,14079.

<sup>2828</sup> [P02349](#); [P02350](#). See [REDACTED]; [REDACTED].

<sup>2829</sup> [REDACTED].

<sup>2830</sup> [REDACTED]; [P03090](#), p.4; KARANMladen:T.46(30-Jan-2020); [REDACTED]; [P03273](#), p.1-2.

<sup>2831</sup> [P00842](#), p.1-2; KRSMANOVIĆDragoslav:T.14-15(3-Oct-2019).

<sup>2832</sup> [REDACTED]; [REDACTED]; STEVANOVIĆObiad:T.9(22-Sep-2020); STEVANOVIĆObiad:T.32-33(23-Sep-2020); STEVANOVIĆObiad:T.22-23(1-Oct-2020).

<sup>2833</sup> [P00817](#), p.6; [P00842](#), p.3. See [REDACTED]; [REDACTED].

<sup>2834</sup> [P03273](#), p.2; [REDACTED]; [P00553](#), p.13-14,16-17,35; [P00536](#).

<sup>2835</sup> [P00842](#), p.1-2; [REDACTED] [REDACTED]; [REDACTED]; RFJ-150:T.21(24-May-2018); KRSMANOVIĆDragoslav:T.15(3-Oct-2019); [P00817](#), p.6.

<sup>2836</sup> [P00842](#), p.2; [REDACTED]; [REDACTED].

<sup>2837</sup> [REDACTED].

back to the frontlines,<sup>2838</sup> as required to maintain the territory from which they had expelled non-Serbs in the previous years. The authority of **STANIŠIĆ** and **SIMATOVIĆ** in this process is exemplified by [REDACTED].<sup>2839</sup>

673. To facilitate preventing Croats and other non-Serbs' return, the Accused used their Unit<sup>2840</sup> to prevent resident Serbs from leaving the territory, pursuing JCE members' goal of making sure that their forcible removals were permanent.<sup>2841</sup>

674. The Scorpions, under BOCA<sub>(DB)</sub>'s command, assisted BOŽOVIĆ<sub>(DB)</sub> and [REDACTED] in seizing control of the SVK security service, cementing the SerbianDB's dominance in the JCE members' final attempt to hold onto cleansed territory in SBWS.<sup>2842</sup>

675. By late October 1995, VJ officers observed that "the Serbia State Security is in charge now",<sup>2843</sup> and that "'Frenki', STANIŠIĆ Jovica, FILIPOVIĆ from the SMUP and BOŽOVIĆ are the leaders there",<sup>2844</sup> facilitated by JCE members, including ARKAN and KERTES.<sup>2845</sup> The Serb Forces' goal was to keep Eastern Slavonia Serb;<sup>2846</sup> ARKAN announced: "I want to kill 15,000 Croats, and that's why I'm here."<sup>2847</sup>

<sup>2838</sup> [P03273](#), p.2-3; [REDACTED]; SLIŠKOVIĆDejan:T.52(10-Jul-2018); [REDACTED]; [REDACTED].

<sup>2839</sup> [REDACTED]; [P02354](#); [REDACTED].

<sup>2840</sup> [REDACTED].

<sup>2841</sup> [REDACTED]; [P03323](#); [P03335](#).

<sup>2842</sup> [P03090](#), p.8; [P03273](#), p.1-2; [P00817](#), p.7; [REDACTED].

<sup>2843</sup> [P00817](#), p.1.

<sup>2844</sup> [P00817](#), p.1. *See also* [REDACTED]; KRSMANOVIĆDragoslav:T.14-15(1-Oct-2019); KRSMANOVIĆDragoslav:T.15(3-Oct-2019); STEVANOVIĆObrad:T.35(23-Sep-2020); STEVANOVIĆObrad:T.41(1-Oct-2020); PLAHUTADejan:T.65-66(19-Nov-2019); [REDACTED].

<sup>2845</sup> [P00817](#), p.5.

<sup>2846</sup> [REDACTED]; STEVANOVIĆObrad:T.33(23-Sep-2020).

<sup>2847</sup> [P00842](#).



### III. THE CHARGED CRIME BASE

#### A. Introduction

676. Between 1991 and the end of 1995, **STANIŠIĆ**, **SIMATOVIĆ**, and the other JCE members used Serb Forces to murder hundreds and persecute and forcibly expel thousands of non-Serbs from territories in Croatia and BiH. Each of these crimes advanced the CCP to forcibly and permanently remove the majority of non-Serbs from the targeted areas. The evidence proves beyond reasonable doubt all the elements of murder as a war crime under Article 3 and a crime against humanity under Article 5,<sup>2848</sup> and of persecution<sup>2849</sup> and deportation and forcible transfer<sup>2850</sup> as crimes against humanity under Article 5.

#### **1. Chapeau Elements of War Crimes (Article 3) and Crimes Against Humanity (Article 5)**

677. An armed conflict existed at all times relevant to the charged crimes,<sup>2851</sup> a requirement for both war crimes and crimes against humanity.<sup>2852</sup>

##### (a) Article 3 Chapeau Elements

678. Each charged murder satisfies the *chapeau* elements of Article 3. For each charged crime, there was a nexus between that crime and the armed conflict: the crimes were inextricably linked to the armed conflict, which played a substantial part in the

<sup>2848</sup> The crime of murder requires proof that (a) the victim died; (b) an act or omission of the perpetrator caused the victim's death; and (c) the act or omission was committed with intent to kill the victim or to wilfully cause serious bodily harm which the perpetrator should reasonably have known might lead to death. *Kvočka* AJ, para.261.

<sup>2849</sup> The crime of persecution consists of an act or omission which discriminates in fact and denies a fundamental human right laid down in international law and is carried out with the intention to discriminate on political, racial, or religious grounds. The definition also includes discrimination on grounds of ethnicity. *Stakić* AJ, para.327; *Blaškić* AJ, para.131; *Krnjelac* AJ, para.185; *Vasiljević* AJ, para.113; *Kordić* AJ, para.101,671,674.

<sup>2850</sup> Forcible transfer is the forcible displacement of persons within national boundaries. Deportation is the forcible displacement of persons across a *de jure* or *de facto* state border. Both entail the forcible displacement of persons from the area in which they are lawfully present, without grounds permitted under international law. *Krajišnik* AJ, para.304,308; *Stakić* AJ, para.278,300,317.

<sup>2851</sup> Cross-reference Section [II.F.1\(c\)](#); Section [II.F.2\(h\)](#); Section [II.F.3\(d\)](#); Section [II.F.4\(b\)](#); Section [III.B](#); Section [III.C](#)

<sup>2852</sup> *Tadić* Jurisdiction AD, para.70; *Kunarac* AJ, para.55; *Stakić* AJ, para.342. For crimes against humanity, this requirement is jurisdictional only. *Tadić* AJ, para.249; *Kunarac* AJ, para.83.

perpetrators' ability to commit them.<sup>2853</sup> The Accused's contributions to the crimes and the armed conflict make clear their knowledge of this nexus.<sup>2854</sup>

679. Furthermore, the victims were taking no active part in hostilities as they were either civilians or *hors de combat* when they were killed.<sup>2855</sup> The perpetrators were aware of this: they killed non-Serbs in their homes, after forcibly removing them from their homes and/or after capturing, disarming or detaining them.

(b) Article 5 Chapeau Elements

680. The charged crimes formed part of an attack that was both widespread and systematic:<sup>2856</sup> Serb Forces took over, then ethnically cleansed targeted territories—covering significant parts of BiH and Croatia—in a consistent and coordinated manner. The attack was primarily directed against a civilian population:<sup>2857</sup> it was characterised by military attacks on undefended non-Serb villages, massive forcible displacement of non-Serb civilians from captured territories, systematic executions of non-Serb civilians, and destruction of mosques, churches and homes of non-Serbs and other civilian targets.

681. The Accused knew of the attack and that their crimes formed part of this attack.<sup>2858</sup> The Accused provided ongoing assistance to perpetrators in SAO-Krajina, SAO-SBWS and BiH, beginning before the attack commenced—by providing training and weapons to the perpetrators—and continuing until the end of the conflict.<sup>2859</sup> The Accused knew (and intended) that their acts would further the criminal purpose of the attack: removing non-Serbs, including civilians, from the targeted territories.<sup>2860</sup>

<sup>2853</sup> *Stakić* AJ, para.342; *Kunarac* AJ, para.55,57; *Tadić* Jurisdiction AD, para.70.

<sup>2854</sup> Cross-reference Section [II.D](#); Section [II.E](#)

<sup>2855</sup> GC, Common Article 3; *Čelebići* AJ, para.420; *Krajišnik* TJ, para.847.

<sup>2856</sup> *Kunarac* AJ, para.85,94; *Blaškić* AJ, para.101; *Kordić* AJ, para.94,666; *Nahimana* AJ, para.920; *Stakić* AJ, para.247. Cross-reference Section [II.F](#).

<sup>2857</sup> *Kunarac* AJ, para.90-91; *Popović* AJ, para.567,569; *Šainović* AJ, para.549; *Mrkšić* AJ, para.29,31-32; *Tolimir* AJ, para.141-142; *Martić* AJ, para.305,313; *Milošević* AJ, para.58; *Kordić* AJ, para.99.

<sup>2858</sup> *Tadić* AJ, para.248,252; *Kunarac* AJ, para.102-103; *Blaškić* AJ, para.124; *Kordić* AJ, para.99.

<sup>2859</sup> Cross-reference Section [II.E-F](#).

<sup>2860</sup> Cross-reference Section [IV](#).

## B. The Crimes in Croatia

### 1. The Crimes in Krajina<sup>2861</sup>

682. When the CCP crystallised no later than April 1991, the SAO-Krajina police, TO, and other SAO-Krajina authorities began terrorising Croats with raids and discriminatory policies, a precursor to the campaign to come. Beginning in June 1991, the Unit, SAO-Krajina police and TO, and eventually the JNA conducted joint operations targeting the non-Serb civilian population across the region. From August to December 1991, the SAO-Krajina police and TO and the JNA murdered people in or near Dubica and Baćin, Lipovača, Poljanak, Vukovići, Saborsko, Škabrnja, and Bruška; the victims were almost entirely non-Serb civilians. JCE members and their Serb Forces continued to commit crimes against non-Serb civilians in the entire Krajina region until the end of 1995. As was intended by the JCE members, Serb Forces implementing the CCP in Krajina murdered, persecuted, and forcibly displaced the non-Serb population. Thousands of non-Serb were expelled from the Krajina region over the course of the Indictment period. These crimes were committed with persecutory intent, as is evident from, *inter alia*, the targeting of non-Serbs, and non-Serb villages, the damaging of Catholic churches, the ethnic slurs during the killings, and bombs destined for “Tuđman’s rats”.<sup>2862</sup>

(a) SAO-Krajina police and other authorities terrorised Croats with raids and discriminatory policies from April 1991

683. From April through June 1991, the SAO-Krajina police raided predominantly Croat villages near Knin, including Potkonje, Kninsko Polje, and Vrpolje, selectively targeting Croats, causing them to flee.<sup>2863</sup> [REDACTED].<sup>2864</sup> They beat and disarmed Croats, poisoned their livestock, destroyed their orchards, searched their homes, and set them on fire,<sup>2865</sup> leaving the Croat population psychologically devastated.<sup>2866</sup>

<sup>2861</sup> Indictment, para.22-25,26-28,30-32,35,64-66.

<sup>2862</sup> Indictment, para.22-25.

<sup>2863</sup> BABIĆMilan:[P01246](#), T.13488-13499; BABIĆMilan:[P01248](#), T.1418-1419; [REDACTED]; [P00347](#), p.1-2; [P00348](#), p.1-3; [REDACTED]; [P00328](#)(00:04:30-00:07:15), p.3-4; [REDACTED]; [P00232](#)(00:02:25-00:05:10), p.1-2; [REDACTED]; RFJ-153:T.65-66(15-Jun-2017). See AF170. See also [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2864</sup> [REDACTED].

<sup>2865</sup> BABIĆMilan:[P01248](#), T.1418-1419; [REDACTED]; RFJ-153:T.45(14-Jun-2017); [REDACTED]; [REDACTED].

<sup>2866</sup> [REDACTED]. See also BABIĆMilan:[P01246](#), T.13488-13499; [P00347](#), p.1.

684. From the first half of 1991, the SAO-Krajina police, TO, Captain DRAGAN<sub>(DB)</sub>, and later the JNA operated detention facilities in Knin—including an old-hospital known as “MARTIĆ’s prison”—where they detained and mistreated non-Serbs.<sup>2867</sup> [REDACTED].<sup>2868</sup>

685. SAO-Krajina authorities, including MARTIĆ, declined to investigate crimes against Croats. MARTIĆ justified the Knin police force’s failure to identify a single perpetrator of attacks on Croat homes and businesses in April 1991,<sup>2869</sup> stating that “[t]he Knin police force [was] busy with the defence of the Krajina borders and the protection of the Serbian people” and “simply [could not] spend more time solving *this type* of criminal activity”.<sup>2870</sup> Terrorised by the ongoing crimes and raids against them, hundreds of Croats from Knin, many of whom were women and children,<sup>2871</sup> fled to Šibenik in May and June 1991.<sup>2872</sup> [REDACTED] “[t]hey didn’t leave of their own free will because they were concerned for safety. They were expelled.”<sup>2873</sup>

686. From mid-May through June 1991,<sup>2874</sup> Croats were also expelled from the Skradin bay area, [REDACTED].<sup>2875</sup>

(b) The Unit and SAO-Krajina police and TO, under SIMATOVIĆ’s command, forcibly displaced non-Serbs in attacks in Kostajnica and Lovinac

687. From late June 1991, SIMATOVIĆ, MARTIĆ, the SAO-Krajina police and TO, and the Unit executed the CCP by attacking villages across SAO-Krajina and forcibly displacing much of SAO-Krajina’s non-Serb population. These early operations became a

<sup>2867</sup> [REDACTED]; ERSTIĆStanko:[P01750](#), p.19-21; ERSTIĆStanko:[P01751](#), T.24972,24978-24981,24984,24996-24997,24999; ERSTIĆStanko:[P01752](#), T.3869-3870,3874,3876-3878. *See* AF385-AF388; AF393-AF397. Detention facility at Knin fortress: [REDACTED]; [REDACTED]; [REDACTED]; [P00012](#). Detention facility at the JNA barracks: BRKIĆLuka:[P00304](#), T.3264-3269,3271-3274,3430-3431; BRKIĆLuka:T.46-47(30-Aug-2017). *See* AF389-AF392; AF396.

<sup>2868</sup> [REDACTED]; [REDACTED].

<sup>2869</sup> [P00321](#); [REDACTED]; BABIĆMilan:[P01248](#), T.1547-1548; [REDACTED]. Similar attacks also occurred in other areas, *see e.g.* MARINOVIĆAnte:[P01219](#), p.2; MARINOVIĆAnte:[P01220](#), T.2476; [REDACTED].

<sup>2870</sup> [P00321](#)(emphasis added). *See also* [REDACTED].

<sup>2871</sup> [REDACTED]; RFJ-153:T.66(15-Jun-2017).

<sup>2872</sup> [REDACTED]; [P00347](#), p.1-3; [P00348](#), p.1-3; [REDACTED]; [REDACTED]; [REDACTED] [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13488-13499; BABIĆMilan:[P01248](#), T.1418-1419; [REDACTED]; RFJ-153:T.65-66(15-Jun-2017); RFJ-153:T.70(20-Jun-2017).

<sup>2873</sup> [REDACTED].

<sup>2874</sup> [REDACTED].

<sup>2875</sup> [REDACTED].

blueprint for the JCE members' coordinated operations to remove non-Serbs throughout the Indictment period.

(i) Glina/Operation Žaoka

688. On 26 June 1991, the SAO-Krajina police and Serb volunteer units, under Captain DRAGAN<sub>(DB)</sub> command, attacked the Glina police station for the first time.<sup>2876</sup> From around 25 to 27 July 1991, Serb Forces—including Golubić-trained members of the Unit,<sup>2877</sup> the SAO-Krajina police,<sup>2878</sup> and TO<sup>2879</sup>—attacked Glina again as part of Operation “Žaoka”, as well as Struga and surrounding Kostajnica villages, in order to clear “the area of [the remaining] Ustasha forces”<sup>2880</sup> and “establish Serbian control”.<sup>2881</sup> Captain DRAGAN<sub>(DB)</sub> and the Serb Forces under his command deployed from the Šamarica camp.<sup>2882</sup> During the operation, Serb Forces, including the Unit, targeted churches, houses, a school, and a veterinary station.<sup>2883</sup> As a result of these attacks, Croat civilians fled their homes to Zagreb, Sisak and elsewhere.<sup>2884</sup> By the end of 1995, at least 1,227 Croats (84.7% of the pre-war Croat population) were displaced from Glina, most of whom left in June and July 1991.<sup>2885</sup>

689. IVANOVIĆ<sub>(DB)</sub> led the Unit in the field during Operation “Žaoka”, while Captain DRAGAN<sub>(DB)</sub> and SIMATOVIĆ maintained overall command over the Unit as well as the SAO-Krajina police and TO.<sup>2886</sup> Although the JNA officially acted as a buffer during

<sup>2876</sup> [2D00915](#), p.3; BABIĆ Milan: [P01246](#), T.13907; [P03416](#), p.2. See also [P03741](#), p.3-4.

<sup>2877</sup> E.g. Ilija VUCKOVIĆ<sub>(DB)</sub>: THEUNENSReynaud:T.26-27(7-Mar-2018); [P03237](#); Saša MEDAKOVIĆ<sub>(DB)</sub>: [P03235](#); Nikola PUPOVAC<sub>(DB)</sub>: [1D00032](#); [REDACTED]; Nikola PILIPOVIĆ<sub>(DB)</sub>: [P00258](#), p.12-13; [REDACTED]; [P00262](#), p.11; Rade BOŽIĆ<sub>(DB)</sub>: [P01985](#); Dragan OLUIĆ<sub>(DB)</sub>: [P00844](#); [P00261](#), p.5; Borjan VUČKOVIĆ<sub>(DB)</sub>: [P03234](#); [P00260](#), p.1,3,5,29. Cross-reference AnnexA. Also e.g. [P00500](#), p.3,16; [P03236](#). See also [P03230](#); [P03231](#); [P01154](#); [P03232](#); [P03233](#); [P01986](#); [P00271](#)(00:00:00-00:00:38), p.1-2; [REDACTED]; [P03059](#).

<sup>2878</sup> [REDACTED].

<sup>2879</sup> [2D00915](#), p.3; [P01966](#); [P01967](#); [P01968](#).

<sup>2880</sup> [2D00915](#), p.3.

<sup>2881</sup> THEUNENSReynaud:T.21-22(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.227-229; [2D00139](#); [P03741](#), p.1-3; [REDACTED]; [P00328](#)(00:07:30-00:09:01), p.4-5; [P00335](#)(00:01:00-00:03:02), p.2-3; [P03747](#), p.3; BIJAKJakub:[P00595](#), p.90. See AF170; AF174; AF178-AF179.

<sup>2882</sup> [P03233](#); [P03401](#); [P03402](#), p.1; THEUNENSReynaud:T.21-22(7-Mar-2018); [2D00139](#), p.1.

<sup>2883</sup> [P01985](#); [P01986](#); [P03230](#), p.1; [P03235](#); [1D00032](#); [1D00047](#), p.1-2.

<sup>2884</sup> [P03236](#); [P03237](#). See AF174; AF398.

<sup>2885</sup> BIJAKJakub:[P00595](#), p.30,32,47,91.

<sup>2886</sup> Cross-reference Section [II.F.1\(c\)\(ii\)a](#). [REDACTED]; [REDACTED]; [P03741](#), p.1-3; [P03237](#); [P03402](#), p.1,6; [1D00047](#); THEUNENSReynaud:T.23-27(7-Mar-2018); THEUNENSReynaud:[P01980](#), p.226-229; [REDACTED]. See AF178.

these attacks,<sup>2887</sup> elements of the JNA collaborated with the Serb Forces to draw the JNA into the operation on the side of the Serb Forces.<sup>2888</sup>

(ii) Ljubovo

690. On 2 July 1991, Golubić-trained SAO-Krajina police and the Unit, under the command of **SIMATOVIĆ** and Captain DRAGAN<sub>(DB)</sub>, attacked Ljubovo aiming to drive out the non-Serb population, further raising ethnic tensions.<sup>2889</sup> The attack gave newly-trained Serb Forces the opportunity to apply their acquired skills to attack a Croat village and demonstrate their loyalty and courage.<sup>2890</sup>

(iii) Lovinac

691. On 5 August 1991, **SIMATOVIĆ** and MARTIĆ<sup>2891</sup> commanded the Unit and SAO-Krajina police and TO in attacking the predominantly Croat village of Lovinac.<sup>2892</sup> They used mortars and **SIMATOVIĆ**'s armoured train,<sup>2893</sup> with a Golubić-trained crew directly subordinate to him.<sup>2894</sup>

692. [REDACTED].<sup>2895</sup> After the attack, the Croat population was "in a panic, [...] [and] wanted to leave, to escape",<sup>2896</sup> but **SIMATOVIĆ** and MARTIĆ did not manage to take over Lovinac on that occasion.<sup>2897</sup>

693. **SIMATOVIĆ** returned in September with his Unit from Korenica camp to complete the cleansing operation alongside the JNA.<sup>2898</sup> The Unit set Lovinac on fire and

<sup>2887</sup> See AF75; AF178-AF179. See also BABIĆMilan:P01248, T.1447-1448.

<sup>2888</sup> See e.g. P01967; P01966, p.1; P03231; P03741, p.1,3,6. See also P01986; 2D00139, p.1. Cross-reference Section II.F.1(c)(ii)a.

<sup>2889</sup> [REDACTED]; [REDACTED]; DRAČAAco:T.28(26-Nov-2019); P01555; P00261, p.5; [REDACTED]; 2D00089, p.1-2. See AF174; AF176.

<sup>2890</sup> [REDACTED]; DRAČAAco:T.28(26-Nov-2019). See [REDACTED]. Cross-reference Section II.E.4(a)(i).

<sup>2891</sup> RFJ-066:T.6-7(24-Aug-2017); [REDACTED]. See AF175.

<sup>2892</sup> [REDACTED]; [REDACTED]; BABIĆMilan:P01248, T.1519-1520; MAKSIĆRadoslav:P00025, para.81; P00048; [REDACTED]; P00328(00:07:30-00:09:01), p.4-5; P00335(00:01:00-00:03:02), p.2-3; P00258, p.12; [REDACTED]; P01154; P03747, p.3; P00217, p.1-2(BCS)(**SIMATOVIĆ**'s signature visible in the BCS original). See AF174-AF175.

<sup>2893</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:P01246, T.13748; P00217(BCS)(signed by **SIMATOVIĆ**). See also [REDACTED].

<sup>2894</sup> P00318; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:P01246, T.13404; [REDACTED]; [REDACTED]; [REDACTED]; P00380; P00317, p.1,5,6,11; P00318.

<sup>2895</sup> [REDACTED]; [REDACTED].

<sup>2896</sup> [REDACTED].

<sup>2897</sup> [REDACTED].

looted it.<sup>2899</sup> The Croat inhabitants had to be protected “so that they wouldn’t be killed by people within Frenki’s circle”.<sup>2900</sup> Initially, they hid in a house, but when that proved insufficient, they were moved towards territory under the Croatian government’s control.<sup>2901</sup> By the end of 1995, at least 342 Croats (74.3% of the pre-war Croat population) had left Lovinac, most of whom left in August and September 1991.<sup>2902</sup>

(c) Serb Forces forcibly displaced and murdered non-Serbs from August to December 1991 in JNA-led operations

694. From late August through December 1991, the JNA abandoned its role as a neutral force in Krajina, as it had also done in SBWS from early August, joining the Unit and SAO-Krajina police and TO in coordinated operations to drive non-Serbs out of desired territories through murder and other violence.<sup>2903</sup>

(i) Kijevo

695. On 26 August 1991, units of the JNA 9<sup>th</sup> Corps, the SAO-Krajina police and local TO (including Golubić-trained troops), and Unit members, led by MARTIĆ and MLADIĆ, attacked and destroyed the Croat village of Kijevo.<sup>2904</sup> Before the attack, MARTIĆ issued an ultimatum to the population, warning that “further co-existence in our Serbian territories of the SAO Krajina is impossible”, and advising them “to find safe shelters on time so that there should be no casualties among them.”<sup>2905</sup>

696. [REDACTED].<sup>2906</sup> On 26 August, the Serb Forces attacked Kijevo to cleanse the area of its non-Serb population.<sup>2907</sup> They looted and torched private houses,<sup>2908</sup> and targeted and later destroyed the Catholic church to “send a message to the Croatian

<sup>2898</sup> BABIĆMilan:P01248, T.1431-1433,1603-1604; BABIĆMilan:P01246, T.13395-13396,14095-14096; [REDACTED]; P00056. See also [REDACTED]; P00187; [REDACTED]; [REDACTED].

<sup>2899</sup> BABIĆMilan:P01246, T.14096.

<sup>2900</sup> BABIĆMilan:P01246, T.13068-13069.

<sup>2901</sup> BABIĆMilan:P01246, T.13069.

<sup>2902</sup> BIJAKJakub:P00595, p.30,32,93.

<sup>2903</sup> Cross-reference Section II.E.1(c); Section II.F.1(c)(iii); Section II.F.2(h)(i).

<sup>2904</sup> BABIĆMilan:P01246, T.13180,13182-13184,13651; BABIĆMilan:P01244, para.15; [REDACTED]; [REDACTED]; [REDACTED]; P00335(00:01:00-00:03:02), p.2-3; P02885, p.196-197; P00260, p.29; [REDACTED]. See AF181; AF183-AF184.

<sup>2905</sup> P01319; BABIĆMilan:P01246, T.13180-13181; [REDACTED]; 1D00024, p.11. See AF181-AF182.

<sup>2906</sup> [REDACTED]. Cross-reference Section II.E.1(b); AnnexA.

<sup>2907</sup> [REDACTED]; [REDACTED]; P00351(00:00:58-00:01:22), p.1; [REDACTED]; [REDACTED].

<sup>2908</sup> [REDACTED]; BABIĆMilan:P01246, T.13182-13183,13984; [REDACTED]; P00351(00:00:20-00:01:43); [REDACTED]. See AF185.



population that remained in Kijevo that they had no reason to stay there”.<sup>2909</sup> [REDACTED].<sup>2910</sup> [REDACTED].<sup>2911</sup> Subsequently, MARTIĆ’s men and the local TO, on orders of MLADIĆ, broke into and looted houses in Vrlika and Kijevo and destroyed everything else.<sup>2912</sup>

697. Serb Forces killed around 14 civilians during and in the days following the Kijevo attack.<sup>2913</sup> MARTIĆ admitted that they “didn’t care about the victims”.<sup>2914</sup> Through this attack, Kijevo “was cleansed” of its Croat population.<sup>2915</sup> By the end of 1995, at least 953 non-Serbs (75.7% of Kijevo’s pre-war non-Serb population) had left, over half of whom left during or in the days following the attack.<sup>2916</sup>

(ii) Hrvatska Kostajnica area

698. From 25 August 1991, Serb Forces—including the SAO-Krajina police and TO, the 7<sup>th</sup> Banija volunteer division (based at Šamarica camp and until the end of September operating under **SIMATOVIĆ** and MARTIĆ), and the JNA—attacked the Hrvatska Kostajnica area, including the mixed town of Dubica and the predominantly Croat villages of Cerovljani and Baćin, taking over the area on 12/13 September 1991.<sup>2917</sup> From September, MARTIĆ coordinated these attacks with the JNA.<sup>2918</sup> During and after these attacks, these Serb Forces damaged the Catholic church in Cerovljani (leaving the Serbian Orthodox church undamaged), destroyed the homes of Croats and Muslims and looted private property, mostly belonging to Croat inhabitants.<sup>2919</sup> They killed and mistreated local non-Serbs,<sup>2920</sup> including by burning them alive,<sup>2921</sup> arbitrarily arresting

<sup>2909</sup> [REDACTED]; [REDACTED]; [REDACTED]. See AF185.

<sup>2910</sup> [REDACTED]; [P00352](#), p.1-3; [P00353](#)(00:00:50-00:01:12). See also [REDACTED].

<sup>2911</sup> [REDACTED]; [REDACTED]. See also [P00010](#)(00:00:15-00:01:04), p.1-2.

<sup>2912</sup> [P01291](#), p.1; BABIĆMilan:[P01246](#), T.13182-13183.

<sup>2913</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>2914</sup> [1D00024](#), p.12.

<sup>2915</sup> [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13182-13183.

<sup>2916</sup> BIJAKJakub:T.42(3-Oct-2017); BIJAKJakub:[P00595](#), p.30,32,96.

<sup>2917</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13383-13385,13388,13393; [REDACTED]. See AF170; AF188-AF194; AF198-AF200; AF202-AF203; AF207.

<sup>2918</sup> See AF198.

<sup>2919</sup> [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13393; [REDACTED]. See AF206; AF215-AF216; AF224-AF226. See also [REDACTED]; [P00062](#).

<sup>2920</sup> See [P03320](#), p.1; [P03322](#), p.1-2.

<sup>2921</sup> [P00406](#), p.1.

and detaining them in inhumane conditions,<sup>2922</sup> beating and torturing them,<sup>2923</sup> and using them as human shields.<sup>2924</sup>

699. For instance, on 15 September 1991, the JNA, the SAO-Krajina police and TO surrounded the mixed village of Predore near Dubica, searched houses, and rounded up non-Serbs.<sup>2925</sup> They detained two of them with other non-Serbs, first in the TO headquarters in Dubicka Brda, and later in a toilet in the Dubica school.<sup>2926</sup> During the day, these Serb Forces directed the detainees to loot Croat property and perform forced labour.<sup>2927</sup> At night, members of the SAO-Krajina police<sup>2928</sup> beat the detainees with guns and axes and forced them to run around singing pro-Chetnik songs,<sup>2929</sup> firing guns to “inspire” them to keep running when they were tired.<sup>2930</sup> When two detainees forgot the words to a Chetnik song, SAO-Krajina police officers slit their throats, then forced their fellow detainee Josip JOSIPOVIĆ and another detainee to lie on the corpses as they drove to the Una river to dispose of them.<sup>2931</sup> JOSIPOVIĆ understood from hearing conversations between the Serbs that they received orders from MARTIĆ.<sup>2932</sup>

a. Murders<sup>2933</sup>

700. On 20 October 1991, Serb Forces—including the SAO-Krajina police and local TO (referred to as “reservists”<sup>2934</sup>) who took orders from the police—detained mainly elderly non-Serb civilians in Dubica and killed them the next day in Krečane, near the village of Baćin.<sup>2935</sup> [REDACTED].<sup>2936</sup> They rounded up 53 civilians, detained them in the Dubica fire station and read out the names at shift changes to ensure nobody was missing.<sup>2937</sup> Over the course of the night, they released ten detainees who had

<sup>2922</sup> [REDACTED].

<sup>2923</sup> [REDACTED].

<sup>2924</sup> [REDACTED]. See AF204.

<sup>2925</sup> [REDACTED]; [P00406](#), p.1-3. See AF204.

<sup>2926</sup> [REDACTED]; [P00406](#), p.1-3. See AF205; AF221-AF222.

<sup>2927</sup> [REDACTED].

<sup>2928</sup> [REDACTED]; [REDACTED]; [REDACTED]. See AF202.

<sup>2929</sup> [REDACTED]; [P00406](#), p.2. See AF205.

<sup>2930</sup> [REDACTED].

<sup>2931</sup> [REDACTED]; [P00406](#), p.2-3. See AF221-AF222.

<sup>2932</sup> [REDACTED]. See AF205.

<sup>2933</sup> Indictment, para.27. Cross-reference AnnexC.

<sup>2934</sup> [REDACTED].

<sup>2935</sup> [REDACTED]; [REDACTED]; [P00378](#), p.3-4,15-16,22; [REDACTED]. See AF207-AF210; AF217-AF218; AF223.

<sup>2936</sup> [REDACTED]; [REDACTED].

<sup>2937</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00378](#), p.10-12; [REDACTED]. See AF207-AF210; AF212-AF213.

connections with Serbs.<sup>2938</sup> That same night, the SAO-Krajina police and local TO rounded up at least ten people in the neighbouring villages of Baćin and Cerovljani.<sup>2939</sup>

701. On 21 October, these Serb Forces massacred the entire group in Krečane<sup>2940</sup> and dumped them in a mass grave consisting of “improvised pits”<sup>2941</sup>—where 56 bodies were later found.<sup>2942</sup> All but two were Croats.<sup>2943</sup>

702. The civilian authorities—local SDS and SAO-Krajina police officials, who received orders from MARTIĆ<sup>2944</sup>—were “fully involved in what happened at Dubica fire station”.<sup>2945</sup> MARTIĆ met with some of these authorities in Dubica in November 1991.<sup>2946</sup> No one was ever investigated or prosecuted by the Serb authorities for the massacre.<sup>2947</sup>

b. Deportation and forcible transfer<sup>2948</sup>

703. With these attacks on the non-Serb population in Hrvatska Kostajnica, the Serb Forces drove the non-Serb population from the villages of Dubica, Cerovljani, and Baćin, leaving them “completely destroyed and without any inhabitants”.<sup>2949</sup> By the end of 1995, at least 3,499 non-Serbs (63.5% of the pre-war non-Serb population) were displaced from Kostajnica Municipality, most of whom left between July and September 1991.<sup>2950</sup> The date of the takeover by Serb Forces, 13 September 1991,<sup>2951</sup> had the highest number of non-Serb departures from Dubica, Cerovljani and Baćin.<sup>2952</sup>

<sup>2938</sup> [REDACTED]. See AF211.

<sup>2939</sup> [REDACTED]; [REDACTED]. See AF214; AF217-AF218.

<sup>2940</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00378](#), p.3-4,10-12,15-16; [REDACTED]; [REDACTED]. See AF212; AF217-AF218. Cross-reference AnnexC.

<sup>2941</sup> [P00378](#), p.3-4,22; [REDACTED].

<sup>2942</sup> [REDACTED]; [REDACTED]; [P00378](#), p.22.

<sup>2943</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See AF213.

<sup>2944</sup> [REDACTED]; [REDACTED]; [REDACTED]. See AF205.

<sup>2945</sup> [REDACTED]; [REDACTED].

<sup>2946</sup> [REDACTED]; [REDACTED].

<sup>2947</sup> [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>2948</sup> Indictment, para.64-66.

<sup>2949</sup> BABIĆMilan:[P01246](#), T.13393; [REDACTED]; BABIĆMilan:[P01248](#), T.1573; [REDACTED]; [REDACTED]; [REDACTED]. See AF200; AF214; AF220.

<sup>2950</sup> BIJAKJakub:[P00595](#), p.30,32,53,98-102.

<sup>2951</sup> See AF199-AF200.

<sup>2952</sup> BIJAKJakub:[P00595](#), p.98-101.

(iii) Saborsko area

704. From at least August to November 1991, Serb Forces—including a Golubić-trained SAO-Krajina special police unit under Nikola MEDAKOVIĆ,<sup>2953</sup> a regular police unit,<sup>2954</sup> TO<sup>2955</sup> and JNA units,<sup>2956</sup> and a Plaški DB special sabotage unit<sup>2957</sup>—repeatedly attacked the predominantly Croat villages around Saborsko to “cleansing” the area of its Croat population.<sup>2958</sup> [REDACTED] the Unit based at the Korenica camp, under **SIMATOVIĆ**’s direct command, assisted in “cleansing” operations in the Saborsko area, meaning the “physical removal or expulsions of those who lived there. They had to be driven away from their hearths, from their homes, from that part where they lived.... It was done through the use of force”.<sup>2959</sup> The commander of the Plaški DB unit, Đuro OGRIZOVIĆ aka Šnjaka,<sup>2960</sup> reported to the Korenica DB,<sup>2961</sup> where **SIMATOVIĆ** was based at the time.<sup>2962</sup>

705. Serb Forces shelled Saborsko almost daily from 5 August 1991.<sup>2963</sup> On 8 October 1991, the JNA shelled the Vukovići hamlet and used machine guns against Croat

<sup>2953</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; VUKOVIĆVlado:[P00196](#), T.2657-2658; BOSNIĆMile:[1D00236](#), para.72; BOSNIĆMile:[1D00241](#), p.5; [P03469](#), p.2; [P00193](#), p.2; [2D00010](#), p.7; [REDACTED]; [P00188](#), p.1-2; [P00190](#), p.2. See AF233; AF261; AF253; AF262.

<sup>2954</sup> [REDACTED]; [REDACTED]; [2D00010](#), p.7; [P00188](#); [REDACTED]. See AF261.

<sup>2955</sup> [REDACTED]; [REDACTED]; [P00066](#); [P00189](#); [P00188](#), p.1-2; [P00053](#), p.1-4,7; [P00190](#), p.1-3; [P00191](#), p.1-4; [REDACTED]; [P03469](#), p.2; [2D00010](#), p.7; BABIĆMilan:[P01246](#), T.13394-13395. See AF234; AF253.

<sup>2956</sup> VUKOVIĆVlado:[P00196](#), T.2657-2658; [REDACTED]; [REDACTED]; [P00066](#); [P00189](#); [P00041](#), p.1-2,5; [P00191](#), p.1-4; [P00053](#), p.1-4,7; [REDACTED]; RFJ-066:T.41-42(10-Jul-2017); [REDACTED]; [2D00010](#), p.7; [P00193](#), p.4; BABIĆMilan:[P01246](#), T.13394-13395; BABIĆMilan:[P01248](#), T.1600. See AF232-AF234; AF247; AF253.

<sup>2957</sup> [REDACTED]; [P00066](#); [2D00010](#), p.7; [REDACTED]; [REDACTED]; [P00188](#); BABIĆMilan:[P01248](#), T.1599-1600. See AF253.

<sup>2958</sup> VUKOVIĆVlado:[P00194](#), p.3; VUKOVIĆVlado:[P00196](#), T.2657-2660,2692-2693; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [2D00008](#), p.4; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13400; BABIĆMilan:[P01248](#), T.1600. See AF228-AF229; AF242; AF245; AF251; AF254.

<sup>2959</sup> RFJ-066:T.40-42(10-Jul-2017); [REDACTED]; RFJ-066:T.4-6(24-Aug-2017); [REDACTED]; [REDACTED]; [REDACTED]; [P00261](#), p.5; BABIĆMilan:[P01246](#), T.13114; BABIĆMilan:[P01248](#), T.1511-1512.

<sup>2960</sup> [2D00010](#), p.7,13; [REDACTED]; [REDACTED].

<sup>2961</sup> [P00066](#). The report was signed with OGRIZOVIĆ’s coded signature, see [2D00010](#), p. 13.

<sup>2962</sup> BABIĆMilan:[P01248](#), T.1431-1432; BABIĆMilan:[P01246](#), T.13397. See also [REDACTED]; MAKSIĆRadoslav:[P00025](#), para.23,75-76; MAKSIĆRadoslav:T.18-20,38(21-Jun-2017); MAKSIĆRadoslav:T.47-49(22-Jun-2017). Cross-reference Section [II.F.1\(b\)\(i\)b](#).

<sup>2963</sup> BIĆANIĆAna:[P00388](#), T.25526,25522-25523; BIĆANIĆAna:[P00387](#), p.4. See AF249.

civilians.<sup>2964</sup> The attacks culminated in the final removal and murders of non-Serbs in Saborsko in early November 1991.<sup>2965</sup>

706. Serb Forces killed, beat, threatened, arbitrarily detained, and otherwise mistreated Croat civilians during these attacks.<sup>2966</sup> They demolished the church in Saborsko, burned the Croatian flag in Poljanak, replacing it with a Serb flag, shelled and burned Croat homes, looted, stole and destroyed their property, and expelled them.<sup>2967</sup> In Saborsko, “they razed everything to the ground. They left nothing behind”.<sup>2968</sup> [REDACTED].<sup>2969</sup> MEDAKOVIĆ observed: “Saborsko suffered the same sad fate as Vaganac, Drežnik, Lovinac, and all other places whose residents tried to defy the Serbs by using force. [...] Now there is no Saborsko anymore and it is likely that it will never be there again”.<sup>2970</sup>

a. Murders

i. Lipovača and Poljanak Murders in October 1991<sup>2971</sup>

707. On 23 October 1991, Serb JNA soldiers, most of whom were locals,<sup>2972</sup> hanged a father and his son in Poljanak, both Croat civilians [REDACTED].<sup>2973</sup>

708. At the end of October, Serb Forces, likely SAO-Krajina police,<sup>2974</sup> shot four Croat civilians dead in the family home of Franjo BROZINČEVIĆ<sup>2975</sup> and three in Mate BROZINČEVIĆ’s home.<sup>2976</sup> JNA soldiers had previously warned the people in Lipovača that “[w]hen we leave, beware of the reserve forces of those paramilitary units ’who

<sup>2964</sup> [REDACTED]; [REDACTED].

<sup>2965</sup> BIĆANIĆAna:[P00387](#), p.4; BIĆANIĆAna:[P00388](#), T.25522-25523,25531; [P00187](#); [2D00010](#), p.1-3. *Cross-reference* Section [II.F.1\(c\)\(iii\)](#).

<sup>2966</sup> BIĆANIĆAna:[P00388](#), T.25523,25530-25533; BIĆANIĆAna:[P00387](#), p.3-6; VUKOVIĆVlado:[P00194](#), p.3-4; VUKOVIĆVlado:[P00196](#), T.2664-2674,2712-2714; [P00193](#), p.5-6; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00889](#), p.1-11; [2D00010](#), p.1-2,10-12. *See* AF234-AF241; AF246; AF263.

<sup>2967</sup> BIĆANIĆAna:[P00387](#), p.4-6; BIĆANIĆAna:[P00388](#), T.25526,25528,25531-25532; [REDACTED]; RFJ-064:T.38-39(31-Aug-2017); [REDACTED]; [REDACTED]; [REDACTED]; RFJ-072:T.44,54,58-60(5-Jul-2017); [P00193](#), p.4-6; [P00188](#), p.1-2; VUKOVIĆVlado:[P00194](#), p.4; VUKOVIĆVlado:[P00196](#), T.2660,2675,2713,2724,2726,2733; [2D00010](#), p.1-3,8-11; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *See* AF252; AF256-AF257; AF261-AF262; AF264.

<sup>2968</sup> BIĆANIĆAna:[P00388](#), T.25531.

<sup>2969</sup> [REDACTED]; [REDACTED].

<sup>2970</sup> [P00187](#); [REDACTED].

<sup>2971</sup> Indictment, para.28. *Cross-reference* AnnexC.

<sup>2972</sup> [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13394,13397; BABIĆMilan:[P01248](#), T.1600; [P00189](#), p.1-2.

<sup>2973</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00889](#), p.7-9. *Cross-reference* AnnexC.

<sup>2974</sup> *See* AF233; AF170.

<sup>2975</sup> *See* AF233; AF236-AF240. *Cross-reference* AnnexC.

would' beat the people, set houses on fire, loot and who would kill' regardless of age."<sup>2977</sup> In June 1996, the bodies of all seven individuals were exhumed from mass graves in Lipovača Drežnička.<sup>2978</sup>

ii. Vukovići and Poljanak Murders on 7 November 1991<sup>2979</sup>

709. On 7 November 1991, Serb Forces—including the JNA's Niš Special Unit, the Korenica TO and local Serbs under Korenica TO commander Miloš CVIJETIČANIN—attacked Vukovići and Poljanak and killed ten Croat civilians.<sup>2980</sup> [REDACTED].<sup>2981</sup> [REDACTED].<sup>2982</sup> They chased everyone from the house, beat the men,<sup>2983</sup> [REDACTED] and started shooting<sup>2984</sup> [REDACTED].<sup>2985</sup> [REDACTED],<sup>2986</sup> a soldier told him, "no Ustashe should stay alive".<sup>2987</sup>

710. [REDACTED].<sup>2988</sup> [REDACTED],<sup>2989</sup> [REDACTED].<sup>2990</sup>

711. [REDACTED].<sup>2991</sup> In Poljanak, they executed two more Croat civilians.<sup>2992</sup> [REDACTED].<sup>2993</sup>

iii. Saborsko Murders on 12 November 1991<sup>2994</sup>

712. During the 12 November 1991 shelling attack on Saborsko, Serb Forces—including the JNA, SAO-Krajina police, and members of OGRIZOVIĆ's Plaški DB unit—attacked a group of around 20 Croat villagers who had been sheltering in a

<sup>2976</sup> See AF238-AF239.

<sup>2977</sup> See AF232.

<sup>2978</sup> See AF240.

<sup>2979</sup> Indictment, para.28,30. *Cross-reference* AnnexC.

<sup>2980</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13397; [P00889](#), p.1-5; [2D00010](#), p.11-12. *Cross-reference* AnnexC.

<sup>2981</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>2982</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2983</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2984</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2985</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [2D00010](#), p.11-12; [P00889](#), p.1,5. *Cross-reference* AnnexC.

<sup>2986</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2987</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2988</sup> REDACTED; [REDACTED]; [REDACTED]; [REDACTED]; [2D00010](#), p.11-12; [P00889](#), p.1,5.

<sup>2989</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>2990</sup> [REDACTED].

<sup>2991</sup> [REDACTED]; [REDACTED].

<sup>2992</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00889](#), p.1-5; [2D00010](#), p.11-12. *Cross-reference* AnnexC.

<sup>2993</sup> [REDACTED]; [P00889](#), p.1-5.

<sup>2994</sup> Indictment, para.31. *Cross-reference* AnnexC.

basement, killing seven men and an elderly woman.<sup>2995</sup> To prevent soldiers from burning the home where they were sheltered,<sup>2996</sup> one woman left the basement waving a makeshift white flag, shouting that they were civilians.<sup>2997</sup> Soldiers ordered the villagers out of the basement, separated the men from the women,<sup>2998</sup> and threw a grenade into the basement thinking someone was still there.<sup>2999</sup> Soldiers swore—“fuck your Ustaša mother”—and said the villagers should be slaughtered.<sup>3000</sup> After confiscating money and valuables, soldiers beat and used automatic rifles to kill the unarmed men.<sup>3001</sup> After soldiers told the women to “get lost” or be killed,<sup>3002</sup> soldiers shot at them as they ran away, killing an elderly woman and wounding another.<sup>3003</sup> Soldiers later boasted about shooting Croats in Saborsko because they “hated all Ustashas”.<sup>3004</sup>

713. Serb Forces killed another 23 Croats that day, most of them too old or sick to flee.<sup>3005</sup> They burned at least ten Croats in their homes and killed one with an axe.<sup>3006</sup>

b. Deportation and forcible transfer<sup>3007</sup>

714. Through the attacks, murders, and other crimes outlined above, Serb Forces expelled Croats from the Saborsko region:<sup>3008</sup> “Whoever could find a way out of that hell,

<sup>2995</sup> BIĆANIĆAna:[P00387](#), p.4-6,8; BIĆANIĆAna:[P00388](#), T.25529,25531-25533,25536; [REDACTED]; VUKOVIĆVlado:[P00194](#), p.4; VUKOVIĆVlado:[P00195](#); [REDACTED]; [P00197](#); [P00198](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00193](#), p.4; [2D00010](#), p.8-9. See AF255-AF259, Cross-reference AnnexC.

<sup>2996</sup> BIĆANIĆAna:[P00387](#), p.4. See AF256.

<sup>2997</sup> BIĆANIĆAna:[P00388](#), T.25529; BIĆANIĆAna:[P00387](#), p.4; [REDACTED]. See AF256.

<sup>2998</sup> BIĆANIĆAna:[P00387](#), p.5; [REDACTED]; [2D00010](#), p.8-9. See AF256-AF257.

<sup>2999</sup> BIĆANIĆAna:[P00388](#), T.25529; BIĆANIĆAna:[P00387](#), p.5; [P00193](#), p.5; [REDACTED]. See AF257.

<sup>3000</sup> BIĆANIĆAna:[P00388](#), T.25529; BIĆANIĆAna:[P00387](#), p.5; [REDACTED]. See AF256.

<sup>3001</sup> BIĆANIĆAna:[P00388](#), T.25529,25533,25537; BIĆANIĆAna:[P00387](#), p.5; [REDACTED]; [REDACTED]; [REDACTED]; [P00197](#); [P00198](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00193](#), p.4; [2D00010](#), p.8-9. See AF257; AF259-AF260. Cross-reference AnnexC.

<sup>3002</sup> BIĆANIĆAna:[P00387](#), p.5; [2D00010](#), p.8-9.

<sup>3003</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00197](#); [P00198](#); [2D00010](#), p.8-9. See AF258-AF259. Cross-reference AnnexC.

<sup>3004</sup> [P00193](#), p.4.

<sup>3005</sup> VUKOVIĆVlado:[P00196](#), T.2676-2677,2714,2726; VUKOVIĆVlado:[P00194](#), p.4; VUKOVIĆVlado:[P00195](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00199](#), p.3; [P00197](#), p.1-2; [P00198](#); [2D00010](#), p.8-10. See AF259. Cross-reference AnnexC.

<sup>3006</sup> VUKOVIĆVlado:T.85-86(6-Jul-2017); [REDACTED]; VUKOVIĆVlado:[P00196](#), T.2714,2726,2676-2677; [P00199](#), p.3; [2D00010](#), p.8-10. Cross-reference AnnexC.

<sup>3007</sup> Indictment, para.64-66.

<sup>3008</sup> BIĆANIĆAna:[P00388](#), T.25530-25532,25534; BIĆANIĆAna:[P00387](#), p.5; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; VUKOVIĆVlado:[P00196](#), T.2659-2660,2675,2693,2713,2726-2727; RFJ-072:T.61(5-Jul-2017); [REDACTED]; [2D00010](#), p.1-3,8-10; BABIĆMilan:[P01248](#), T.1600-1601. See AF232; AF242; AF248; AF258; AF263.



fled.”<sup>3009</sup> Regarding Saborsko, Poljanak, and Lipovača, BABIĆ testified: “villages that used to be populated by Croats and Croat houses were devastated and there were no Croat residents any more.”<sup>3010</sup> By the end of 1995, at least 130 Poljanak non-Serbs,<sup>3011</sup> 159 Lipovača non-Serbs<sup>3012</sup> and 658 Saborsko non-Serbs were displaced (83.9%, 71.3%, and 78.9% of the pre-war non-Serb populations of these locations, respectively).<sup>3013</sup> Most people left Saborsko on 12 November 1991, the day of the final removal and murder of non-Serbs in Saborsko.<sup>3014</sup>

(iv) Southern municipalities

a. Škabrnja and surrounding villages

715. From September to November 1991, Serb Forces—including the JNA, SAO-Krajina police, and TO—repeatedly attacked the predominantly Croat villages of Škabrnja, Nadin, Polača, and their surrounding hamlets.<sup>3015</sup> During these attacks, the Serb Forces employed napalm and cluster bombs with messages, such as “greetings from the JNA for Tudman’s rats”.<sup>3016</sup> They killed,<sup>3017</sup> beat, cursed, and threatened non-Serbs during and after these attacks.<sup>3018</sup> The Serb Forces looted, destroyed, and damaged non-

<sup>3009</sup> BICANIĆAna: [P00388](#), T.25532.

<sup>3010</sup> BABIĆMilan: [P01248](#), T.1600-1601.

<sup>3011</sup> BIJAKJakub: [P00595](#), p.30,32,116.

<sup>3012</sup> BIJAKJakub: [P00595](#), p.30,32,114.

<sup>3013</sup> BIJAKJakub: [P00595](#), p.30,32,103.

<sup>3014</sup> BIJAKJakub: [P00595](#), p.103.

<sup>3015</sup> MILJANIĆMarko: [P00288](#), p.2-5; MILJANIĆMarko: [P00290](#), T.24321-24322,24324; MILJANIĆMarko: [P00292](#), T.2360,2368,2375-2379,2383,2401-2403,2406-2409,2414-2418,2420-2422,2427; MILJANIĆMarko: [P00291](#), T.2862,2868-2872,2875,2884-2885,2917-2919,2923,2927-2928,2930; MILJANIĆMarko: T.13,22-24,48,55(29-Aug-2017); [P02886](#), p.168,356; BRKIĆLuka: [P00303](#), p.3-6; BRKIĆLuka: T.59-60(30-Aug-2017); BRKIĆLuka: T.2-4,6,21-22(31-Aug-2017); BRKIĆLuka: [P00304](#), T.3227-3230,3234-3237,3254-3256,3386,3395,3397-3399,3417,3435; [2D00025](#); [P00305](#); [REDACTED]; ŠEGARIĆNeven: [P00409](#), T.2835,2856-2857; [REDACTED]; [REDACTED]; [REDACTED]; MAKSIĆRadoslav: [P00025](#), para.82,130; [P00064](#), p.1-3; BRKIĆBoško: [P00442](#), p.2. See AF170; AF265-AF267; AF269-AF279; AF281; AF298; AF301. See also [2D00024](#).

<sup>3016</sup> MILJANIĆMarko: [P00292](#), T.2360-2362,2377-2378; MILJANIĆMarko: [P00288](#), p.3; MILJANIĆMarko: [P00290](#), T.24318; MILJANIĆMarko: [P00291](#), T.2868,2871,2926; [1D00030](#), p.1-2,5; BRKIĆLuka: [P00303](#), p.3; BRKIĆLuka: [P00304](#), T.3392-3394,3435; [REDACTED]. See AF270; AF276-AF277.

<sup>3017</sup> MILJANIĆMarko: [P00288](#), p.3-6; MILJANIĆMarko: [P00291](#), T.2865; MILJANIĆMarko: [P00292](#), T.2386-2393; [P00294](#); MILJANIĆMarko: T.64-65(29-Aug-2017); [1D00030](#), p.2; [1D00031](#); BRKIĆBoško: [P00442](#), p.2; [REDACTED]; [P03314](#); [P00064](#), p.7; [REDACTED]. See AF270; AF294-AF297; AF299-AF300. Cross-reference Section [III.B.1\(c\)\(iv\)a.i](#).

<sup>3018</sup> BRKIĆLuka: [P00303](#), p.3-6; BRKIĆLuka: [P00304](#), T.3234-3235,3247-3248,3251-3252,3401; [REDACTED]; ŠEGARIĆNeven: [P00409](#), T.2856; [REDACTED]; MILJANIĆMarko: [P00290](#), T.24363-24364; MILJANIĆMarko: [P00291](#), T.2879-2880,2922-2923; MILJANIĆMarko: [P00292](#), T.2429-2430; MILJANIĆMarko: T.59-61(29-Aug-2017); [1D00030](#), p.5,7; [1D00029](#); BRKIĆBoško: [P00442](#), p.3; [P00300](#); [P00064](#), p.4-5. See AF285-AF286; AF289; AF292-AF293.

Serbs' homes, and shelled the school and the Catholic church in the centre of Škabrnja.<sup>3019</sup>

716. The attacks culminated on 18 November 1991 with the "horrible massacre" of at least 74 Croats in Škabrnja.<sup>3020</sup> Illustrating the immense scale of the Serb Forces' assault on the non-Serb populations across Croatia, this was the same day that Vukovar in SAO-SBWS fell to Serb Forces, culminating in the mass exodus of non-Serbs from that region.<sup>3021</sup> MLADIĆ ordered the Škabrnja attack on 18 November 1991,<sup>3022</sup> indicating to the Benkovac War Presidency on the previous day that he intended to erase the village.<sup>3023</sup> The Golubić-trained Benkovac SJB special unit, commanded by Goran OPAČIĆ<sub>(DB)</sub>,<sup>3024</sup> participated in that attack under MARTIĆ's command.<sup>3025</sup> [REDACTED].<sup>3026</sup>

717. Although most of the population had previously fled as a result of the earlier attacks, many had returned by 18 November, after a ceasefire was brokered on 5 November 1991.<sup>3027</sup> Marko MILJANIĆ described the 18 November attack as "hell. [...] [A]nimals in barns are burning; sheep, cows, horses, people are moaning. You see dismembered human bodies around you. [...] These were horrible moments. [...]"

<sup>3019</sup> MILJANIĆMarko:[P00289](#); MILJANIĆMarko:T.22-24,45-47(29-Aug-2017); [P00063](#), p.1,3; [P00295](#); [P00302](#)(p.1-8,12(BCS))(photographs of destroyed buildings in the BCS original); MILJANIĆMarko:[P00292](#), T.2377-2378; [1D00028](#), p.1; [1D00030](#), p.2; BRKIĆLuka:[P00303](#), p.3-6; BRKIĆLuka:T.44(30-Aug-2017); BRKIĆLuka:[P00304](#), T.3237,3239,3241-3242,3290-3291,3395,3397; ŠEGARIĆNeven:[P00409](#), T.2837-2838,2847-2852; MAKSIĆRadoslav:[P00025](#), para.130; [REDACTED]; BRKIĆBoško:[P00442](#), p.3-4; [P00064](#), p.3-5; [REDACTED]; BABIĆMilan:[P01246](#), T.13402. See AF268; AF277-AF278.

<sup>3020</sup> DRAČAAco:T.92(27-Nov-2019). Cross-reference Section [III.B.1\(c\)\(iv\)a.i](#).

<sup>3021</sup> Cross-reference Section [II.F.2\(h\)\(i\)](#); Section [III.B.2\(b\)\(iii\)](#).

<sup>3022</sup> [P00049](#), p.1-2,4; MAKSIĆRadoslav:[P00025](#), para.82. See also MILJANIĆMarko:[P00292](#), T.2427; MILJANIĆMarko:[P00291](#), T.2872-2873; BRKIĆLuka:[P00304](#), T.3417-3418,3434; [P00064](#), p.1,3-4.

<sup>3023</sup> DRAČAAco:T.91-92(27-Nov-2019); DRAČAAco:T.52(26-Nov-2019); [REDACTED]; [P02886](#),p.346,356. See also MILJANIĆMarko:T.11,28(30-Aug-2017) MILJANIĆMarko:[P00290](#), T.24350-24351; MILJANIĆMarko:[P00291](#), T.2874; MILJANIĆMarko:[P00292](#), T.2400.

<sup>3024</sup> [P01971](#), p.9; MILJANIĆMarko:T.40-44(29-Aug-2017); MILJANIĆMarko:[P00291](#), T.2880,2922-2923; BABIĆMilan:[P01248](#), T.1601; [P00301](#); [REDACTED]; [1D00031](#); [2D00392](#); [2D00393](#). See AF274. See also OPAČIĆGoran:[REDACTED](confirming that he was in a SJB special unit with individuals listed in [P01971](#) and that his unit deployed in the attack on Škabrnja); contra DRAČAAco:T.9,13-14(28-Nov-2019). Cross-reference AnnexA. OPAČIĆ's self-serving claim that he and his unit withdrew and did not participate in the attack is unreliable and should be disregarded in the face of overwhelming evidence to the contrary. See [REDACTED].

<sup>3025</sup> [REDACTED]; DRAČAAco:T.18(28-Nov-2019); [P00219](#), p.5; [P00300](#); BABIĆMilan:[P01248](#), T.1601; BABIĆMilan:[P01246](#), T.13402,13405-13406. See AF274.

<sup>3026</sup> [REDACTED].

<sup>3027</sup> MILJANIĆMarko:[P00288](#), p.3-4; MILJANIĆMarko:[P00290](#), T.24343,24354; MILJANIĆMarko:[P00291](#), T.2863,2865,2915-2916; MILJANIĆMarko:[P00292](#), T.2362-2365; [1D00028](#), p.7; [1D00030](#), p.2; BRKIĆLuka:[P00303](#), p.3; [REDACTED]; [REDACTED].

[M]ayhem all around.”<sup>3028</sup> The JNA forced civilians, including dozens of women and children, to walk in front of their tanks as human shields.<sup>3029</sup> [REDACTED].<sup>3030</sup> When MILJANIĆ attempted to radio for help, a local JNA officer intercepted, threatening “[t]here is no help for you. It’s better for you to hang yourself. That’s better, because we are going to hang you, skin you, and to fry your liver on a grill.”<sup>3031</sup>

718. After the massacre, MARTIĆ praised the Benkovac SJB special unit and OPAČIĆ<sub>(DB)</sub><sup>3032</sup> [REDACTED].<sup>3033</sup>

i. Murders<sup>3034</sup>

719. Serb Forces—including OPAČIĆ<sub>(DB)</sub> SJB unit, the JNA, the SAO-Krajina police and TO, and Serb volunteer units—killed 74 Croats,<sup>3035</sup> including at least 46 civilians<sup>3036</sup> and 11 civilian defenders, who were not taking active part in the hostilities at the time of their death,<sup>3037</sup> during the attack on Škabrnja on 18<sup>3038</sup> and 19<sup>3039</sup> November 1991. They dragged civilians from their shelters and beat and executed them on the

<sup>3028</sup> MILJANIĆMarko:[P00291](#), T.2876-2877. *See also* [REDACTED]; [P00293](#), p.1(p.9(BCS))(photograph of the dead body of a woman, who was run over by a tank, in the BCS original); [P00393](#), p.1; [REDACTED].

<sup>3029</sup> BRKIĆLuka:[P00303](#), p.3,5; BRKIĆLuka:T.25(31-Aug-2017); BRKIĆLuka:[P00304](#), T.3246,3402-3403; MILJANIĆMarko:[P00288](#), p.4-5; MILJANIĆMarko:[P00291](#), T.2876,2913; MILJANIĆMarko:[P00292](#), T.2396; MILJANIĆMarko:T.38(29-Aug-2017); [P00300](#).

<sup>3030</sup> [REDACTED]; ŠEGARIĆNeven:[P00409](#), T.2853-2854; [REDACTED].

<sup>3031</sup> MILJANIĆMarko:[P00290](#), T.24363-24364; [1D00030](#), p.5,7. *See also* MILJANIĆMarko:[P00291](#), T.2879-2880,2922; MILJANIĆMarko:T.59-60,62(29-Aug-2017); [1D00029](#).

<sup>3032</sup> [REDACTED]; [P00219](#), p.5; [REDACTED]; [P00301](#); BABIĆMilan:[P01246](#), T.13402; [1D00030](#), p.5,7; MILJANIĆMarko:T.39-41,59-61(29-Aug-2017); MILJANIĆMarko:T.38-39(30-Aug-2017); MILJANIĆMarko:[P00292](#), T.2429-2430; MILJANIĆMarko:[P00291](#), T.2880,2922. *See* AF274.

<sup>3033</sup> [REDACTED]. *See also* [P00256](#)(00:09:55-00:10:02)(00:45:57-00:46:28), p.5,27; [REDACTED].

<sup>3034</sup> Indictment, para.32. *Cross-reference* AnnexC.

<sup>3035</sup> According to the expert reports, 75 Croats were killed (*see* STRINOVIĆDavor:[P00862](#), p.76-83; BILIĆVišnja:[P00598](#), p.10-16; BILIĆVišnja:[P00597](#), p.90-92). Since the evidence suggests that civilian defender, Šime ŠEGARIĆ, was killed by shelling during the attack on Škabrnja, the Prosecution has removed him from its victims list (*see* MILJANIĆMarko:[P00288](#), p.4; [P00396](#), p.1; STRINOVIĆDavor:[P00862](#), p.81; BILIĆVišnja:[P00598](#), p.15; BILIĆVišnja:[P00597](#), p.92).

<sup>3036</sup> [P00294](#), p.5-14; MILJANIĆMarko:[P00297](#). *See* AF290-AF291; AF294.

<sup>3037</sup> MILJANIĆMarko:[P00292](#), T.2387-2391; [P00294](#), p.2-5. *See* AF290; AF292; AF297.

<sup>3038</sup> [REDACTED]; DRAČAAco:T.13(28-Nov-2019); ŠEGARIĆNeven:[P00409](#), T.2841-2847,2850,2852-2853,2856-2857; [P00293](#), p.1-3(p.5--26(BCS))(photographs of dead bodies in the BCS original); [REDACTED]; BRKIĆBoško:[P00442](#), p.2; MILJANIĆMarko:[P00290](#), T.24342-24343; MILJANIĆMarko:T.16-17,20-24,40-44,64-65(29-Aug-2017); MILJANIĆMarko:[P00291](#), T.2868-2872,2875,2877-2878,2917-2919; MILJANIĆMarko:[P00292](#), T.2384,2386-2393,2408-2409,2414-2418; [P00294](#); MILJANIĆMarko:[P00297](#); [1D00030](#), p.1,3-8; [P00219](#), p.5; [P00301](#); [P00300](#); [1D00031](#); [P00063](#), p.1,3-4; MAKSIĆRadoslav:[P00025](#), para.130; [P00064](#), p.1,3-5; [REDACTED]; [P00402](#)(01:20:58-01:21:30)(01:25:30-01:27:18); [P00396](#); [P00394](#); [P00395](#); [P00393](#); [P00314](#); BRKIĆLuka:T.54(30-Aug-2017); BRKIĆLuka:T.21(31-Aug-2017); BRKIĆLuka:[P00303](#), p.3-5; BRKIĆLuka:[P00304](#), T.3398,3253; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13405-13406. *See* AF285-AF286; AF289; AF290-AF297; AF299-AF300. *Cross-reference* AnnexC. *See also* [2D00024](#).

<sup>3039</sup> [P00400](#), p.1; [REDACTED]; [P00294](#), p.2,5,8-11.

streets,<sup>3040</sup> killing many by dum-dum bullets shot into the backs of their heads, shattering their skulls.<sup>3041</sup> Members of the Benkovac TO beat an *hors de combat* defender they had captured and taken into custody, banged him on the asphalt, shot him in the head, cut off his ear, and then threw him into the bushes, where he suffered for over an hour before succumbing.<sup>3042</sup> One paralysed 92-year-old woman was killed in her bed.<sup>3043</sup> The perpetrators wiped out entire families,<sup>3044</sup> shouting “we’re going to kill all of you Ustasha”.<sup>3045</sup>

ii. Deportation and forcible transfer<sup>3046</sup>

720. During and following the attacks, the Serb Forces physically expelled non-Serbs from the region and, through the crimes outlined above, forced the remaining non-Serb population to flee.<sup>3047</sup> The purpose of these attacks was to cleanse the Croat population from the area.<sup>3048</sup> Around 2 October 1991, a JNA intelligence officer had warned Škabrnja’s residents that MLADIĆ was a “very nasty person” and they should run to Zadar for their lives.<sup>3049</sup> This warning came to fruition with the 18 November massacre, which was a “strategic action” to intimidate the Croats in the region, showing “by way of an example what would happen to others”.<sup>3050</sup> By April 1995, at least 665 Croats from Nadin<sup>3051</sup> and about 1,500 civilian Croats from Škabrnja were displaced.<sup>3052</sup> The vast majority of non-Serbs fled Škabrnja on 18 November 1991, the day of the massacre.<sup>3053</sup> No Croat villager returned to the region until after Operation Storm.<sup>3054</sup>

<sup>3040</sup> MILJANIĆMarko:[P00288](#), p.4-6; MILJANIĆMarko:[P00291](#), T.2871; MILJANIĆMarko:[P00292](#), T.2384; [P00300](#). See AF285-AF286; AF289.

<sup>3041</sup> [P00298](#)(Clip 1, Clip 2, 00:00:00-00:01:55), p.1. Cross-reference AnnexC.

<sup>3042</sup> MILJANIĆMarko:[P00297](#), p.4; [P00293](#), p.2(p.6(BCS))(photograph of Ante RAČOV’s dead body in the BCS original); [P00299](#); [P00219](#), p.5; [P00301](#), p.2; MILJANIĆMarko:[P00292](#), T.2388; MILJANIĆMarko:[P00291](#), T.2871; [REDACTED]; ŠEGARIĆNeven:[P00409](#), T.2841. See AF292; AF297. Cross-reference AnnexC.

<sup>3043</sup> MILJANIĆMarko:[P00297](#), p.6; MILJANIĆMarko:[P00288](#), p.4; [REDACTED]. See AF291.

<sup>3044</sup> [P00298](#)(00:13:46-00:15:11), p.4.

<sup>3045</sup> MILJANIĆMarko:[P00297](#), p.5. See also [REDACTED].

<sup>3046</sup> Indictment, para.64-66.

<sup>3047</sup> MILJANIĆMarko:[P00288](#), p.4-5; MILJANIĆMarko:[P00291](#), T.2873; BRKIĆBoško:[P00442](#), p.2; [REDACTED]; [REDACTED]. See AF270; AF275; AF279-AF280. See also [P00298](#)(00:13:46-00:15:11), p.4.

<sup>3048</sup> MILJANIĆMarko:[P00292](#), T.2384-2385; MILJANIĆMarko:[P00291](#), T.2873,2875,2899; [REDACTED]. See also BRKIĆLuka:[P00304](#), T.3418-3419; [REDACTED].

<sup>3049</sup> MILJANIĆMarko:[P00291](#), T.2865-2867; MILJANIĆMarko:[P00288](#), p.3.

<sup>3050</sup> MILJANIĆMarko:[P00292](#), T.2384-2385; MILJANIĆMarko:[P00291](#), T.2873,2875,2899.

<sup>3051</sup> BIJAKJakub:[P00595](#), p.30,32,87.

<sup>3052</sup> BIJAKJakub:[P00595](#), p.30,32,138. See AF280. See also BIJAKJakub:[P00595](#), p.75.

<sup>3053</sup> BIJAKJakub:[P00595](#), p.138.

<sup>3054</sup> BABIĆMilan:[P01246](#), T.13408.

b. Bruška and Marinovići

721. From at least September through December 1991, the SAO-Krajina police and local armed Serbs stopped, searched, and harassed Croat villagers<sup>3055</sup> at roadblocks they had erected around the predominantly Croat village of Bruška from February 1991.<sup>3056</sup> These Serb Forces threatened to kill local Croats, called them “Ustashas” and shot over the village almost every night,<sup>3057</sup> telling them this was Serb country and they “should get [their] stuff and leave”.<sup>3058</sup>

i. Murders<sup>3059</sup>

722. On 21 December 1991, the Golubić-trained Benkovac SJB special unit, commanded by OPAČIĆ<sub>(DB)</sub>,<sup>3060</sup> attacked several civilian homes in the Croat hamlet of Marinovići in Bruška, murdering nine Croats and one Serb who was socialising with the Croat victims.<sup>3061</sup> Three SAO-Krajina policemen barged into the first home and took five men outside,<sup>3062</sup> all unarmed and in civilian clothes, except one—a Serb, who had been forced to join the JNA.<sup>3063</sup> Outside, SAO-Krajina policemen lined the men up against the wall of the house and shot them—killing four<sup>3064</sup> and severely wounding one.<sup>3065</sup> A

<sup>3055</sup> MARINOVIĆAnte:[P01219](#), p.2-3; MARINOVIĆAnte:[P01220](#), T.2475,2497-2498. *See* AF170; AF269; AF305.

<sup>3056</sup> MARINOVIĆAnte:[P01219](#), p.2-3; MARINOVIĆAnte:[P01220](#), T.2475-2476,2478-2479,2493; MARINOVIĆAnte:[P01221](#), T.5347-5348,5356-5357. *See* AF170; AF269; AF302-AF303; AF305. *See also* ERSTIĆStanko:[P01750](#), p.18-19; DENONAJasna:[P00412](#), p.2; DENONAJasna:[P00414](#), T.1270.

<sup>3057</sup> MARINOVIĆAnte:[P01219](#), p.2-3; MARINOVIĆAnte:[P01220](#), T.2479-2480,2493.

<sup>3058</sup> MARINOVIĆAnte:[P01219](#), p.3; MARINOVIĆAnte:[P01220](#), T.2479-2480. *See* AF305.

<sup>3059</sup> Indictment, para.35. *Cross-reference* AnnexC.

<sup>3060</sup> BABIĆMilan:[P01246](#), T.13407-13408; [P00219](#), p.5; MILJANIĆMarko:T.39-41(29-Aug-2017); [REDACTED]. *See also* [REDACTED].

<sup>3061</sup> MARINOVIĆAnte:[P01219](#), p.3-4; DENONAJasna:[P00411](#), T.2025; DENONAJasna:[P00413](#), T.28198-28199,28204; DENONAJasna:[P00414](#), T.1272,1274-1276; [P00419](#); DRAČAAco:T.26-27,30,32-34(28-Nov-2019); [REDACTED]; [P02887](#), p.176,178; [P00420](#), p.1,3-4; [P00421](#); [P00958](#); [P00959](#); [P03062](#). *See* AF304. *Cross-reference* AnnexC.

<sup>3062</sup> MARINOVIĆAnte:[P01219](#), p.3; MARINOVIĆAnte:[P01220](#), T.2480-2484,2499; DENONAJasna:[P00413](#), T.28198-28199,28204. *See* AF306-AF307.

<sup>3063</sup> MARINOVIĆAnte:[P01220](#), T.2481; DENONAJasna:[P00412](#), p.2; DENONAJasna:[P00413](#), T.28199,28204,28214.

<sup>3064</sup> MARINOVIĆAnte:[P01219](#), p.3; MARINOVIĆAnte:[P01220](#), T.2482-2484; DENONAJasna:[P00412](#), p.3; DENONAJasna:[P00414](#), T.1274; [P00419](#), p.1; [P00420](#), p.1,3-4; STRINOVIĆDavor:[P00862](#), p.35-37,83-84; [P00958](#), p.1-6,11; [P00959](#); [P03062](#). *See* AF307-AF308; AF310.

<sup>3065</sup> MARINOVIĆAnte:[P01219](#), p.3-4; MARINOVIĆAnte:[P01220](#), T.2482-2485; DENONAJasna:[P00411](#), T.2028; DENONAJasna:[P00412](#), p.3; DENONAJasna:[P00414](#), T.1309; [P00419](#), p.2; [P03062](#), p.1. *See* AF308.



SAO-Krajina police officer later threatened the survivor while his wounds were being treated in the hospital, saying “[t]his Ustasha must be slaughtered immediately”.<sup>3066</sup>

723. The SAO-Krajina police then attacked a second family home, killing two Croat civilians.<sup>3067</sup> Three women and a 15-year-old girl managed to flee into the garden but the SAO-Krajina policemen shot several bursts of automatic fire at them, severely wounding and permanently disabling the girl.<sup>3068</sup> The following day, one of these women and her neighbour discovered the “bullet riddled” bodies of four more Croats wearing civilian clothes in front of a third family home.<sup>3069</sup>

724. The Serb Forces attacked the villagers in Marinovići “[o]nly because [they] were Croats”.<sup>3070</sup> The subsequent investigation into the killings was essentially a cover-up, facilitated by “someone with a top position in [Serbian] MUP”.<sup>3071</sup>

ii. Deportation and forcible transfer<sup>3072</sup>

725. Through these attacks, the Serb Forces terrorised the Croat population of Bruška, leaving them no choice but to flee for their lives; all villagers left within about 20 days of the murders.<sup>3073</sup> On 24 December 1991, MLADIĆ recorded that there was a request to deliver “11 dead bodies of Bruška village inhabitants” and to enable the evacuation of 2,000 Croats from Bruška, Rodaljice, and other villages.<sup>3074</sup> No Croats returned to the Benkovac area (Škabrnja and Bruška) before Operation Storm in August 1995.<sup>3075</sup> By

<sup>3066</sup> MARINOVIĆAnte:[P01219](#), p.4; MARINOVIĆAnte:[P01220](#), T.2487,2503; MARINOVIĆAnte:[P01221](#), T.5362.

<sup>3067</sup> DENONAJasna:[P00412](#), p.2-4; DENONAJasna:[P00414](#), T.1272; DENONAJasna:[P00413](#), T.28198-28199,28214-28215; DENONAJasna:[P00411](#), T.2025,2028; [P00419](#), p.1; MARINOVIĆAnte:[P01219](#), p.4; MARINOVIĆAnte:[P01220](#), T.2488; [P00420](#), p.1,3-4; STRINOVIĆDavor:[P00862](#), p.35,83; [P00959](#); [P03062](#). See AF309; AF311. *Cross-reference* AnnexC.

<sup>3068</sup> DENONAJasna:[P00412](#), p.3; DENONAJasna:[P00411](#), T.2028; DENONAJasna:[P00413](#), T.28198-28199,28215; [P00419](#). See AF310; AF313.

<sup>3069</sup> DENONAJasna:[P00412](#), p.4; DENONAJasna:[P00414](#), T.1275; DENONAJasna:[P00413](#), T.28198-28199; [P00419](#), p.2; MARINOVIĆAnte:[P01219](#), p.4; MARINOVIĆAnte:[P01220](#), T.2488; [P00420](#), p.1,3-4; STRINOVIĆDavor:[P00862](#), p.35-37,83-84; [P00958](#), p.1-3,6-11; [P00959](#); [P03062](#). See AF311-AF312.

<sup>3070</sup> MARINOVIĆAnte:[P01220](#), T.2489; DRAČAAco:T.28-29(28-Nov-2019)(agreeing that “[p]ersonal feud cannot be a motive for such a crime”).

<sup>3071</sup> [P00421](#); [P03062](#); DRAČAAco:T.27-36(28-Nov-2019); [P00419](#); [REDACTED].

<sup>3072</sup> Indictment, para.64-66.

<sup>3073</sup> MARINOVIĆAnte:[P01219](#), p.4; MARINOVIĆAnte:[P01221](#), T.5348-5349; DRAČAAco:T.24(4-Dec-2019); [REDACTED]; [P00419](#), p.2.

<sup>3074</sup> [P02887](#), p.176,178.

<sup>3075</sup> BABIĆMilan:[P01246](#), T.13408.

April 1995, at least 209 Croats (62.5% of the pre-war Croat population) were displaced from Bruška.<sup>3076</sup>

(d) Serb Forces continued to persecute and forcibly displace Krajina non-Serbs throughout the Indictment period

726. After 1991, RSK authorities, including the police, continued to apply discriminatory policies to pressure Croats to leave Krajina.<sup>3077</sup> They arbitrarily arrested Croats and searched their houses,<sup>3078</sup> restricted their freedom of movement,<sup>3079</sup> subjected their children to discriminatory education policies,<sup>3080</sup> harassed them when they wished to exchange their identification documents,<sup>3081</sup> and forced Croat businesses to pay to continue their operations.<sup>3082</sup> A large number of Croats were arbitrarily dismissed from their jobs,<sup>3083</sup> and infrastructure such as railway lines was destroyed with explosives in majority Croat areas.<sup>3084</sup>

727. Croats remaining in the Krajina region were killed, raped, beaten, and harassed, their houses burned, their property stolen, their shops and stands blown up, and their towns and villages—including churches and religious buildings—destroyed.<sup>3085</sup> MARTIĆ, HADŽIĆ, the police and other RSK authorities not only failed to investigate

<sup>3076</sup> BIJAKJakub:[P00595](#), p.30,32,86.

<sup>3077</sup> [REDACTED]; [P00132](#), p.1; WILSONJohn:[REDACTED]; [P00118](#), p.2. See AF399-AF403. Cross-reference Section [III.B.1\(a\)](#).

<sup>3078</sup> [REDACTED]; [REDACTED].

<sup>3079</sup> [REDACTED]; [REDACTED].

<sup>3080</sup> [REDACTED]. See also [P00155](#), p.58; WILSONJohn:T.19-20(27-Jun-2017).

<sup>3081</sup> [REDACTED].

<sup>3082</sup> [REDACTED].

<sup>3083</sup> [REDACTED].

<sup>3084</sup> [REDACTED].

<sup>3085</sup> [REDACTED]; MILJANIĆMarko:[P00291](#), T.2919; BRKIĆBoško:[P00442](#), p.3; BABIĆMilan:[P01246](#), T.13066-13069,13489; BABIĆMilan:[P01248](#), T.1573-1574; [P00385](#); [P00386](#), p.2-4; [P00354](#), p.2; [P00155](#), p.58; [P00118](#), p.2-3; [P00158](#), p.2-7,9; [REDACTED]; WILSONJohn:T.19-20,28-30,32-33,48(27-June-2017); [REDACTED]; [P00132](#), p.1; [REDACTED]; [REDACTED]; MILJANIĆMarko:T.46-47(29-Aug-2017); ŠEGARIĆNeven:[P00409](#), T.2848; [P00302](#), p.1(p.1,3(BCS))(photograph of destroyed church in the BCS original). See AF225; AF398-AF403. See also [P00159](#), p.2-3.



and prosecute,<sup>3086</sup> but tacitly approved,<sup>3087</sup> instigated<sup>3088</sup> and participated in these crimes.<sup>3089</sup>

728. Serb Forces continued operating the Knin detention facilities.<sup>3090</sup> In 1992 and 1993, RSK police detained mostly innocent elderly Croats.<sup>3091</sup> The judiciary worked only as ordered by the Serb authorities, locking up innocent people and keeping them in detention without bringing any charges.<sup>3092</sup>

729. After Croatian forces attacked Maslenica bridge in January 1993, RSK authorities intensified their persecution of Croats in the areas of Knin, Drniš and Benkovac.<sup>3093</sup> The RSK police resettled Serbs from other areas in Croats' homes, forcing the Croats to flee to collection centres, from which RSK police expelled them to Croatian government-controlled territory.<sup>3094</sup> RSK authorities prevented Croats from returning.<sup>3095</sup> By mid-June 1993, the Krajina region, which had been ethnically mixed before the war, was predominantly Serb,<sup>3096</sup> and by the end of April 1995, at least 92,968 Croats (47.4% of the pre-war population) had been displaced from Krajina, making up 96.3% of all people displaced during that time in Krajina.<sup>3097</sup>

(e) The Krajina crimes are attributable to the Accused and other JCE members

730. The Unit and other forces based in Golubić or Šamarica camp and commanded by **SIMATOVIĆ** personally or through Captain DRAGAN<sub>(DB)</sub> were tools of the Accused.

<sup>3086</sup> [P00118](#), p.3; [P00131](#), p.3; [REDACTED]; [REDACTED]; BABIĆMilan:[P01246](#), T.13066-13067; BABIĆMilan:[P01248](#), T.1573-1574; [REDACTED]. See AF399-AF401. See also DRAČAAco:T.4-5,71(28-Nov-2019); DRAČAAco:T.66(3-Dec-2019); WILSONJohn:T.32-33,48(27-June-2017).

<sup>3087</sup> [REDACTED].

<sup>3088</sup> BABIĆMilan:[P01246](#), T.13489.

<sup>3089</sup> [REDACTED]; DRAČAAco:T.67-70(28-Nov-2019); WILSONJohn:T.48(27-June-2017); [REDACTED]; [P00131](#), p.3; [P00132](#), p.1; [P03088](#). See AF400-AF401. OFS-14's self-serving claim that the police did not participate in the abuse of non-Serbs is unreliable and should be disregarded in the face of overwhelming evidence to the contrary. See [REDACTED].

<sup>3090</sup> [REDACTED] [REDACTED]; BRKIĆLuka:[P00304](#), T.3264-3269,3271-3274,3430-3431; BRKIĆLuka:T.46-47(30-Aug-2017); [REDACTED]; [P03778](#), p.1. See AF385-AF386; AF389-AF396.

<sup>3091</sup> [REDACTED].

<sup>3092</sup> [REDACTED].

<sup>3093</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00385](#); [P00386](#), p.2-4; BABIĆMilan:[P01246](#), T.13489.

<sup>3094</sup> BABIĆMilan:[P01246](#), T.13489; [REDACTED]; [REDACTED]. See also BABIĆMilan:[P01248](#), T.1573-1574; [REDACTED].

<sup>3095</sup> [REDACTED]; WILSONJohn:T.19-20(27-Jun-2017); [P00155](#), p.58. See also DRAČAAco:T.58-59(28-Nov-2019).

<sup>3096</sup> BABIĆMilan:[P01246](#), T.12870-12873; BABIĆMilan:[P01248](#), T.1355-1356; [REDACTED]; [P01381](#), p.2-4,6-7(p.1(BCS)); [REDACTED]; [REDACTED]. See also [P00354](#), p.4; [REDACTED]; [REDACTED].

SAO-Krajina police and volunteer units, and the Plaški DB unit that committed charged crimes in Saborsko, were under the command of and were tools of MARTIĆ. SAO-Krajina TO, including the local Serbs commanded by TO commander CVIJETIČANIN in the attacks on Vukovići and Poljanak, were under the command of and were tools of MARTIĆ and BABIĆ. JNA forces, including TO units under its command, were tools of JCE members KADIJEVIĆ, ADŽIĆ, and MLADIĆ.

731. Crimes committed by other volunteer units acting in concert with JNA, SAO-Krajina police, TO units and the Unit are attributable to the Accused and other JCE members.

732. After the Krajina was incorporated into the RSK, the RSK police and other RSK authorities continued to persecute and forcibly displace Croats. The RSK police as well as other RSK authorities were under the command and tools of JCE members MARTIĆ and HADŽIĆ.

## **2. The Crimes in SBWS<sup>3098</sup>**

733. While Serbian and SBWS political leaders developed parallel civilian structures and ensured that their newly-appointed leaders had the material support needed to establish dominance,<sup>3099</sup> multiple perpetrator groups—welcomed by those civilian structures—unleashed a campaign of persecution and intimidation against non-Serbs, to ensure their departure from Serb-claimed territories. As part of its transformation into a Serb fighting force,<sup>3100</sup> the JNA failed to prevent the expulsion of non-Serbs from Baranja in early August 1991, and thereafter overtly supported TO and other units in attacking towns and villages in Eastern Slavonia and Western Srem, providing the firepower and personnel to cleanse Western Srem of large numbers of non-Serbs by mid-October 1991 and to take Eastern Slavonia in late November 1991. Frequently combining in joint operations across the region, local TO, Unit members, SBWS police, volunteers, paramilitaries and JNA members committed violent crimes to remove non-Serbs, which continued throughout the Indictment period. These crimes were committed with

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<sup>3097</sup> BIJAKJakub:T.30-31,35-36(3-Oct-2017); BIJAKJakub:[P00595](#), p.21,28,30,32.

<sup>3098</sup> Indictment, para.22-26,36-39,42,64-66.

<sup>3099</sup> Cross-reference Section [II.F.2\(a\)](#)-(b).

<sup>3100</sup> Cross-reference Section [II.E.1\(c\)](#).

persecutory intent<sup>3101</sup> as is amply evidenced by the targeting of non-Serbs, non-Serb villages, properties and religious buildings.

(a) Early Attacks

734. Before the conflict, although Eastern Slavonia's population had similar overall percentages of Serbs and Croats, settlements were ethnically polarised.<sup>3102</sup> By April 1991, following HADŽIĆ's arrest by Croatian police in Plitvice,<sup>3103</sup> local Serbs erected barricades in the villages near his home<sup>3104</sup> and formed village guards with SRS volunteers from Serbia.<sup>3105</sup> On 2 May 1991, armed local Serbs and SRS volunteers in Borovo Selo attacked Croat policemen, necessitating separation by the JNA,<sup>3106</sup> still a multi-ethnic army.<sup>3107</sup> One Serb and 12 Croatian policemen were killed; Serbs in Borovo Selo informed the JNA that, but for its intervention, the Croatian police would have been massacred.<sup>3108</sup>

735. Thereafter, tensions escalated as more men and weapons arrived in the area.<sup>3109</sup> The arming of local Serbs achieved its desired result in summer 1991 when Serb Forces began violently seizing non-Serb neighbouring villages, forcing inhabitants from their homes. [REDACTED].<sup>3110</sup> [REDACTED].<sup>3111</sup> [REDACTED],<sup>3112</sup> [REDACTED].<sup>3113</sup> [REDACTED].<sup>3114</sup>

<sup>3101</sup> See Indictment, para.22-25.

<sup>3102</sup> BIJAKJakub:[P00595](#), p.10,74,81-84,125-137.

<sup>3103</sup> Cross-reference Section [II.F.1\(c\)\(i\)](#).

<sup>3104</sup> SAVIĆBorivoje:[P00449](#), para.71; [REDACTED]; RFJ-113:T.63(26-Sep-2017).

<sup>3105</sup> SAVIĆBorivoje:[P00449](#), para.71,97.

<sup>3106</sup> [REDACTED]; [1D00225](#); [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:[P00796](#), para.9; [P03037](#); THEUNENSReynaud:[P01980](#), p.247; [REDACTED].

<sup>3107</sup> BOGUNOVIĆBorislav:[P02718](#), para.85.

<sup>3108</sup> [1D00225](#), p.6; [REDACTED]; SAVIĆBorivoje:[P00449](#), para.76.

<sup>3109</sup> Cross-reference Section [II.F.2\(a\)](#). KRALJEVIĆStipan:[P02603](#), T.5316-5317; [REDACTED]; [REDACTED]; [REDACTED]; SAVIĆBorivoje:[P00449](#), para.47; [REDACTED]; BOGUNOVIĆBorislav:[P02718](#), para.71-72; BOGUNOVIĆBorislav:[P02720](#), T.6018-6019,6070; [REDACTED].

<sup>3110</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3111</sup> [REDACTED]; [REDACTED]. See [REDACTED]; [REDACTED]; [REDACTED].

<sup>3112</sup> [REDACTED]. Cross-reference Section [II.E.3\(a\)\(iv\)b](#).

<sup>3113</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00590](#); RFJ-113:T.52(26-Sep-2017); [REDACTED].

<sup>3114</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

(b) Takeovers from 1 August 1991

(i) Takeover of Erdut, Dalj and surroundings

736. In late July 1991, JNA units heavily shelled select locations in Erdut and Dalj; Croatian MUP members fled the area.<sup>3115</sup> [REDACTED].<sup>3116</sup> [REDACTED].<sup>3117</sup>

737. On 1 August 1991, the SAO-SBWS TO under KOJIĆ<sub>(DB)</sub> in Borovo Selo fired on Croatian MUP positions in Dalj, then JNA tanks entered from Serbia to support the taking of Dalj and Erdut.<sup>3118</sup> When entering Erdut, the JNA encountered no resistance; Croatian MUP members fled the advancing tanks.<sup>3119</sup> Tanks fired on homes along the Erdut-Dalj road and destroyed Croat politicians' homes.<sup>3120</sup> [REDACTED].<sup>3121</sup> TO members entered the remaining houses and killed Croats, forcing any survivors to flee<sup>3122</sup> The Croat population of Dalj, Erdut, and surrounding villages fled to safety in Osijek; many left by boat from Aljmaš.<sup>3123</sup> During and immediately following the takeovers, civilian authorities, SNB and SAO-SBWS TO and police seized non-Serb property,<sup>3124</sup> arbitrarily arrested and detained non-Serbs,<sup>3125</sup> and pursued other restrictive and discriminatory policies.<sup>3126</sup>

738. At least 1,383 persons, excluding children, were displaced from Erdut, Dalj and Aljmaš on 1 and 2 August 1991.<sup>3127</sup> Some were later killed by ARKAN and his SDG, JNA and SNB members, and local SAO-SBWS policemen, as discussed below.<sup>3128</sup> By December 1995, 717 non-Serbs (63.7% of the pre-war population), 1,331 non-Serbs

<sup>3115</sup> [REDACTED]; [REDACTED]; [REDACTED]; ANTUNOVIĆZlatko:[P01229](#), p.5; ANTUNOVIĆZlatko:[P01230](#), T.165,239-240.

<sup>3116</sup> Cross-reference Section [II.F.2\(h\)\(i\)](#).

<sup>3117</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3118</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3119</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3120</sup> [REDACTED]; [REDACTED]; ŠUTALOŁuka:[P01834](#), p.7.

<sup>3121</sup> [REDACTED].

<sup>3122</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3123</sup> RFJ-113:T.56-57(26-Sep-2017); [P00592](#); ANTUNOVIĆZlatko:[P01229](#), p.5; ANTUNOVIĆZlatko:[P01230](#), T.168; SVALINAZvonimir:[P01841](#), p.2.

<sup>3124</sup> [1D00297](#), p.1; ŠUTALOŁuka:[P01836](#), T.25573,25564; ŠUTALOŁuka:[P01834](#), p.9; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; KRALJEVIĆStipan:[P02603](#), T.5368-5369,5371-5372; KRALJEVIĆStipan:[P02601](#), p.6.

<sup>3125</sup> ŠUTALOŁuka:[P01836](#), T.25545,25576; ŠUTALOŁuka:[P01834](#), p.10-11; [REDACTED]; [REDACTED]; [REDACTED]; [P00593](#), para.1,3; [REDACTED]; [REDACTED].

<sup>3126</sup> [P02677](#); [REDACTED]. Cross-reference Section [III.B.2\(b\)\(ii\)](#).

<sup>3127</sup> BIJAKJakub:[P00595](#), p.30-32,104,106-107.

<sup>3128</sup> Cross-reference Section [III.B.2\(c\)](#).

(50.6% of the pre-war population), and 631 non-Serbs (77.5% of the pre-war population) had left Erdut, Dalj and Aljmaš, respectively.<sup>3129</sup>

(ii) Serb Forces quickly occupied Baranja

739. Around August 1991, local SAO-SBWS TO and police seized control of all Baranja's towns and villages.<sup>3130</sup> Many non-Serbs fled after these forces looted and torched their homes.<sup>3131</sup> By the second half of August, the JNA controlled Baranja's largest town, Beli Manastir,<sup>3132</sup> [REDACTED].<sup>3133</sup> By month's end, Serb Forces controlled approximately 80% of Baranja.<sup>3134</sup>

740. In early September 1991, with JNA support, Unit members, a special unit [REDACTED] and SAO-SBWS TO and police under MARTIĆ and KOJIĆ<sub>(DB)</sub>—in Bilje on the day of the attack—took control of Bilje.<sup>3135</sup> Most of the non-Serb civilians fled to Osijek.<sup>3136</sup> Captured Croatian MUP members were detained in Borovo Selo for two days, during which time uniformed SAO-SBWS police beat them unconscious, then revived and tortured them, including cutting the letter “U” for Ustasha into their foreheads.<sup>3137</sup>

741. Thereafter, conditions for non-Serbs deteriorated significantly. Serb Forces, including the [REDACTED] Tikveš-trained unit,<sup>3138</sup> mistreated and expelled or murdered them during “mopping-up” operations in nearby villages.<sup>3139</sup> In addition to issuing discriminatory decisions aimed at permanently expelling the remaining non-Serb population from Baranja,<sup>3140</sup> [REDACTED].<sup>3141</sup>

742. SAO-SBWS police and TO detained many non-Serbs at the Beli Manastir SUP prison and TO facilities<sup>3142</sup> instilling fear in Baranja's remaining non-Serb population,

<sup>3129</sup> BIJAKJakub:[P00595](#), p.104,106-107.

<sup>3130</sup> Cross-reference Section [II.F.2\(h\)\(ii\)](#).

<sup>3131</sup> See Indictment, para.64-66. [REDACTED].

<sup>3132</sup> RFJ-153:T.47-48(15-Jun-2017); RFJ-153:T.36(20-Jun-2017).

<sup>3133</sup> [REDACTED].

<sup>3134</sup> Cross-reference Section [II.F.2\(h\)\(ii\)](#).

<sup>3135</sup> Cross-reference Section [II.F.2\(h\)\(ii\)](#).

<sup>3136</sup> [REDACTED]; RFJ-151:T.14(19-Sep-2017); RFJ-151:T.62-63(20-Sep-2017).

<sup>3137</sup> ŠUTALOŁuka:[P01834](#), p.10; [P00499](#). See [P00698](#), p.1,4.

<sup>3138</sup> [REDACTED].

<sup>3139</sup> Cross-reference Section [III.B.2\(c\)](#).

<sup>3140</sup> [P00466](#); [P00505](#); [P00506](#); [REDACTED]; [P00509](#); [P00510](#); [REDACTED]; RFJ-151:T.99-101(21-Sep-2017); [P00513](#); [P00514](#); [REDACTED]; [P00527](#), p.4; SAVIĆBorivoje:[P00449](#), para.192; [P00164](#), p.4-5.

<sup>3141</sup> [REDACTED].

<sup>3142</sup> [REDACTED]. [REDACTED]; [REDACTED].

convincing many to flee.<sup>3143</sup> In September and October 1991, [REDACTED] BADŽA's SMUP "Plavci" unit transferred 50 to 80 non-Serb civilians detained at the SUP prison to Borovo Selo, then to Dalj,<sup>3144</sup> where many were executed.<sup>3145</sup> [REDACTED].<sup>3146</sup>

743. [REDACTED].<sup>3147</sup>

744. As a direct consequence of these crimes, the non-Serb population had no choice but to flee from areas where they were lawfully present, thus amounting to the crime of forcible transfer and/or deportation.<sup>3148</sup> By 1992, approximately 70% of Baranja's population was Serb, compared to approximately 41.9% Croat and 25.5% Serb pre-conflict, with a sizeable percentage of Hungarians or other ethnicities.<sup>3149</sup>

(iii) Cleansing of Eastern Slavonia and Siege of Vukovar

745. To physically connect Serb-held Baranja to Serb-held territory in Eastern Slavonia, Serb Forces displaced the non-Serbs living in and around Vukovar.<sup>3150</sup> Serb Forces, including ARKAN and his SDG and SRS volunteers, all subordinated to the JNA, commenced a prolonged military attack on Vukovar and its surroundings,<sup>3151</sup> taking over villages en route to and conducting a months-long siege of the town.

746. By August 1991, JNA, SAO-SBWS TO, and various volunteer units, surrounded Vukovar.<sup>3152</sup> On 24 August 1991, JNA airplanes began flying over Ilok at very low altitude and conducting daily combat activity from then on.<sup>3153</sup>

747. In autumn 1991, ARKAN and the SDG worked with the JNA and SAO-SBWS TO units and subordinated SRS volunteers, clearing the terrain and occupying villages and towns around Vukovar. As Serb units overtook territory approaching Vukovar town

<sup>3143</sup> [REDACTED]; [REDACTED].

<sup>3144</sup> [REDACTED]; RFJ-151:T.16-17(19-Sep-2017); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P01084](#); [REDACTED].

<sup>3145</sup> Cross-reference Section [III.B.2\(c\)\(i\)a](#). [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; ŠUTALO Luka: [P01837](#), T.3988; [P00502](#).

<sup>3146</sup> [REDACTED]; [REDACTED].

<sup>3147</sup> [REDACTED].

<sup>3148</sup> See Indictment, para.64-66.

<sup>3149</sup> [REDACTED]; RFJ-151:T.28(20-Sep-2017). See e.g. BIJAK Jakub: [P00595](#), p.39. See also [P01381](#), p.2,6.

<sup>3150</sup> [P03758](#).

<sup>3151</sup> [REDACTED]; ANASTASIJEVIĆ Dejan: [P02423](#), para.107; KARAN Mladen: T.25-26(28-Jan-2020); [REDACTED]; [REDACTED].

<sup>3152</sup> [REDACTED]; BOGUNOVIĆ Borislav: [P02720](#), T.6070; [REDACTED].

<sup>3153</sup> KRALJEVIĆ Stipan: [P02603](#), T.5320-5323; [REDACTED].

in early September 1991, Croats were detained and sent predominantly to the Velepromet warehouse in the Serb-held part of Vukovar, while Serbs were allowed to choose whether they wanted to join the SAO-SBWS TO or go to either the safe part of town or Serbia.<sup>3154</sup> By 25 October, the JNA was firing heavy artillery at Vukovar town “practically non-stop”.<sup>3155</sup>

748. ARKAN and the SDG and SRS volunteers under DEBELI<sub>(DB)</sub> participated in operations in Tenja, Crepulje, Lužac, Bogdanovci, Borovo Naselje, Laslovo, and other locations as Serb Forces moved towards Vukovar.<sup>3156</sup> In advance of the Lužac operation ARKAN instructed his SDG to be careful not to harm Serbs, only to target “Ustashas”.<sup>3157</sup> After the JNA, SDG, and TO captured Lužac in early November, [REDACTED] heard women and children wailing, dragged from their basements in the night and witnessed ARKAN execute a teenage boy the next day.<sup>3158</sup>

749. In joint attacks with the SAO-SBWS TO and JNA after Vukovar fell on 18 November, ARKAN continued mopping up non-Serb villages.<sup>3159</sup> Years later, SDG members bragged that they expelled Croats and perpetrated genocide on a large scale in Vukovar.<sup>3160</sup>

750. Once Vukovar fell to Serb Forces, it fell into a state of chaos and terror, with all manner of crimes being directed against the non-Serbs who finally emerged from their basements and underground shelters after months of shelling and siege. The JNA withdrew, making no effort to establish control, stepping back for a few days to permit

<sup>3154</sup> STOPARIĆGoran:[P00796](#), para.29-30.

<sup>3155</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3156</sup> [REDACTED]; [P02536](#)(00:08:52-00:11:03), p.1; RFJ-129:T.19(3-Jul-2018); [P01117](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P01089](#), p.2,6-8; [P03295](#), p.1,3; THEUNENSReynaud:[P01980](#), p.260-261; [2D00090](#), p.4; STOPARIĆGoran:T.41-42(30-Nov-2017); [2D00146](#); KARANMladen:T.19-21(28-Jan-2020); [REDACTED]; [REDACTED]; NOVAKOVIĆStojan:T.43,47(8-Oct-2020); [P03861](#)(Clip 3, 00:01:25-00:02:08), p.2-3; [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.21,49(4-Sep-2019); [REDACTED]; [REDACTED]; [1D00107](#), p.2-3,5,7; [REDACTED]; [P00762](#); [REDACTED]; [P00789](#); [REDACTED]; ŠANDORŽeljko:[P01223](#), p.10-11; ŠANDORŽeljko:[P01224](#), T.2248-2249,2255. See AF405.

<sup>3157</sup> [P03861](#)(00:14:44-00:18:58), p.3.

<sup>3158</sup> [REDACTED]; [REDACTED].

<sup>3159</sup> [REDACTED]; [REDACTED]; [P01093](#)(00:01:00-00:04:10), p.2-3; [P01100](#); [REDACTED]; [REDACTED]; [P03731](#), p.2-3,5-7; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; ANASTASIJEVIĆDejan:T.49-50(13-Jun-2018).

<sup>3160</sup> RFJ-129:T.19-20(3-Jul-2018).



Chetnik gangs and local TO thugs to rampage the town at will.<sup>3161</sup> Thousands of non-Serbs were bussed out of Vukovar from locations like the Velepromet complex, even as JCE members HADŽIĆ and ARKAN, together with other JNA commanders, convened there for mutual congratulations on their successful conquest of a town they had utterly destroyed.<sup>3162</sup> Vukovar itself was rubble.<sup>3163</sup>

751. Serb Forces bussed the thousands of non-Serbs emerging from basements and underground shelters<sup>3164</sup> out of the city, brutalizing them throughout the journey,<sup>3165</sup> while Serbs were allowed to remain.<sup>3166</sup>

The JNA held refugee groups in its Dalj headquarters before bussing the women and some men to Serbia the next day, in the Borovo school hall where Serb Forces questioned the Croats, in the Dalj police headquarters, and in the Dalj TO headquarters, where a TO guardsman killed a detainee who jumped out of the window.<sup>3167</sup>

752. To aid in separating and interrogating non-Serb men, the Borovo Selo TO set up a temporary detention camp at the Lovas farm<sup>3168</sup> where the Borovo Selo TO killed 11 detainees.<sup>3169</sup>

753. On 20 November, BOGUNOVIĆ, JNA officers, ARKAN, and others attended an SBWS Government meeting at Velepromet, chaired by HADŽIĆ, to discuss, *inter alia*, the fate of detained non-Serbs, including those on busses, removed from Vukovar hospital and waiting at the JNA barracks.<sup>3170</sup> Following this meeting, the JNA and

<sup>3161</sup> ANASTASIJEVIĆDejan:[P02423](#), para.114; ANASTASIJEVIĆDejan:T.7(19-Jun-2018); ANASTASIJEVIĆDejan:T.45-46(20-Jun-2018); STOPARIĆGoran:[P00796](#), para.31-34. See [P00124](#), p.26-27.

<sup>3162</sup> [P03862](#)(00:00:39-00:01:40); [P03862](#)(00:01:40-00:03:34); NOVAKOVIĆStojan:T.49-52(8-Oct-2020).

<sup>3163</sup> [P03862](#)(00:07:34-00:09:27).

<sup>3164</sup> [REDACTED]; ŠANDORŽeljko:[P01223](#), p.8.

<sup>3165</sup> [P03862](#); [REDACTED]; ŠANDORŽeljko:[P01223](#), p.10-12; ANASTASIJEVIĆDejan:T.49(13-Jun-2018); [REDACTED]; RFJ-132:[P01799](#), T.25468,25487. See [P03301](#), p.1.

<sup>3166</sup> See SAVIĆBorivoje:[P00449](#), para.145; SAVIĆBorivoje:[P00450](#), para.2; [P03302](#), p.2; [P00792](#); [P03305](#), p.2,4; [P03306](#); [P03316](#), p.5; [P03318](#).

<sup>3167</sup> [REDACTED]; [P01084](#); [REDACTED]; RFJ-132:[P01799](#), T.25482-25483; [REDACTED]. See [REDACTED]; RFJ-132:[P01799](#), T.25482.

<sup>3168</sup> [REDACTED].

<sup>3169</sup> [REDACTED]; RFJ-132:[P01799](#), T.25483,25485.

<sup>3170</sup> [P02721](#)(00:06:55), p.5; BOGUNOVIĆBorislav:[P02718](#), para.39-48; BOGUNOVIĆBorislav:[P02719](#), para.16; [2D00030](#), p.2-4; NOVAKOVIĆStojan:T.49,56-58(8-Oct-2020); [P03863](#). See AF360.

ŠEŠELJ's men bussed thousands of non-Serbs from the Vukovar area via Velepromet,<sup>3171</sup> and executed 100-150 persons taken from the hospital at Ovčara.<sup>3172</sup>

754. These crimes gave the local non-Serb population no choice but to flee the area where they were lawfully present, thus amounting to the crime of forcible transfer and/or deportation.<sup>3173</sup> By December 1995, 66.5% of the pre-war, non-Serb population of Vukovar and Borovo had been displaced; 83.7% in Tenja; and 86.8% in Laslovo.<sup>3174</sup>

(iv) Serb Forces took over territory and removed non-Serbs from Western Srem

755. A few days after the May 1991 Borovo Selo incident,<sup>3175</sup> the JNA positioned tanks opposite Ilok, blocking the 25 May Bridge over the Danube.<sup>3176</sup> In July, after the ZNG destroyed one of its tanks, the JNA fired heavy artillery on Ilok, damaging the Catholic church and civilian property.<sup>3177</sup> Attacks on surrounding villages began in the summer and escalated with STANIŠIĆ and the SMUP's support.<sup>3178</sup>

756. By August, preparing for a larger scale offensive, the JNA established a new frontline by launching successive attacks on Croat villages.<sup>3179</sup> Thereafter, the JNA surrounded Ilok, using its favourable position to fire, play offensive loud music and drive tanks onto the bridge, creating an atmosphere of constant tension and fear for months.<sup>3180</sup> Under General ARANĐELOVIĆ, based in Šid,<sup>3181</sup> the JNA, with subordinated SRS volunteers and TO "special forces", took non-Serb villages in rapid succession during the autumn of 1991, using heavy artillery, tank units, and aircraft fire, clearly targeting non-

<sup>3171</sup> [P03862](#).

<sup>3172</sup> [P03316](#), p.5; [2D00030](#), p.2-4; BOGUNOVIĆBorislav:[P02718](#), para.51-53; BOGUNOVIĆBorislav:[P02720](#), T.6033; NOVAKOVIĆStojan:T.54(8-Oct-2020); [P03862](#)(00:02:09-00:05:20).

<sup>3173</sup> See Indictment, para.64-66.

<sup>3174</sup> BIJAKJakub:[P00595](#), p.108,110,137.

<sup>3175</sup> Cross-reference Section [II.F.2\(d\)\(i\)](#); Section [III.B.2\(a\)](#).

<sup>3176</sup> KRALJEVIĆStipan:[P02603](#), T.5317-5318; BOGUNOVIĆBorislav:[P02720](#), T.6070.

<sup>3177</sup> BOGUNOVIĆBorislav:[P02720](#), T.6070-6071; KRALJEVIĆStipan:T.6(23-Aug-2018); KRALJEVIĆStipan:[P02603](#), T.5321-5322.

<sup>3178</sup> Cross-reference Section [II.F.2\(c\)-\(e\),\(h\)](#).

<sup>3179</sup> KRALJEVIĆStipan:[P02601](#), p.3; [REDACTED]; [REDACTED].

<sup>3180</sup> [P02608](#), p.1,8; KRALJEVIĆStipan:[P02603](#), T.5347-5348; KRALJEVIĆStipan:[P02601](#), p.6; KRALJEVIĆStipan:T.26,33(22-Aug-2018); KRALJEVIĆStipan:[P02603](#), T.5358-5361; KRALJEVIĆStipan:[P02622](#), para.4.

<sup>3181</sup> VASILJEVIĆAleksandar:T.17(5-Feb-2019).

Serbs.<sup>3182</sup> [REDACTED].<sup>3183</sup> Different combinations of JNA, paramilitary, volunteer, and TO units attacked following the same pattern, leading to the commission of crimes:

- The JNA amassed forces just outside the targeted village, shelled Croatian neighbourhoods and limited residents' freedom of movement;
- Threatening destruction, the JNA issued ultimatums to villagers to relinquish weapons, leading to fruitless negotiations suggesting, falsely, that villagers could remain in their homes;
- Regardless of compliance with the ultimatums, the JNA and other Serb Forces attacked the targeted village, then TO members and paramilitaries entered and committed crimes against civilians.<sup>3184</sup>

757. For example, after the attack on Tovarnik, the newly-constituted SAO-SBWS police, [REDACTED],<sup>3185</sup> robbed the remaining elderly non-Serbs and looted Croat homes,<sup>3186</sup> but spared physically identified Serb homes.<sup>3187</sup> [REDACTED].<sup>3188</sup> After the JNA issued an ultimatum, the JNA and "local Chetniks" attacked Lovas between 5 and 10 October 1991, targeting and damaging many non-Serbs' homes, and forcing the population out.<sup>3189</sup> Non-Serbs from Tovarnik, Ilača, Lovas, and other locations fled towards Ilok and told Ilok's non-Serbs about the murders, destruction and other mistreatment.<sup>3190</sup> In mid-October 1991, approximately 20 non-Serbs who had been detained while the JNA expelled the rest of the population were killed when the JNA,

<sup>3182</sup> KRALJEVIĆStipan:T.13-15,22-24(22-Aug-2018); KRALJEVIĆStipan:[P02601](#), p.3; KRALJEVIĆStipan:[P02603](#), T.5323-5329; [P00487](#), p.3-4; [P03286](#), p.3; STOPARIĆGoran:[P00796](#), para.4,6-12,15; [P02604](#); [P03289](#); [REDACTED]; [REDACTED]; [P02625](#); [REDACTED].

<sup>3183</sup> [REDACTED].

<sup>3184</sup> [P00487](#), p.3-4; [REDACTED]; KRALJEVIĆStipan:T.16-17,22-24(22-Aug-2018); KRALJEVIĆStipan:[P02603](#), T.5324-5325; KRALJEVIĆStipan:[P02622](#), para.7; [P02623](#), p.1-2; [P02624](#); [REDACTED]; [REDACTED]; [REDACTED]; BIJAKJakub:[P00595](#), p.136.

<sup>3185</sup> [REDACTED]; [REDACTED].

<sup>3186</sup> [REDACTED].

<sup>3187</sup> ANASTASIJEVIĆDejan:[P02423](#), para.108.

<sup>3188</sup> [REDACTED]; KRALJEVIĆStipan:[P02603](#), T.5325; BIJAKJakub:[P00595](#), p.130.

<sup>3189</sup> KRALJEVIĆStipan:[P02601](#), p.3; KRALJEVIĆStipan:[P02603](#), T.5327; KRALJEVIĆStipan:T.20(22-Aug-2018); [P00487](#), p.12; [REDACTED]; BOGUNOVIĆBorislav:[P02720](#), T.6071.

<sup>3190</sup> KRALJEVIĆStipan:[P02603](#), T.5324-5328; KRALJEVIĆStipan:T.17(22-Aug-2018); KRALJEVIĆStipan:[P02601](#), p.3.

Dušan Silni, and other Serb Forces forced them across a minefield in Lovas.<sup>3191</sup> HADŽIĆ knew about this and did nothing.<sup>3192</sup>

758. Similarly, following the JNA's ultimatum,<sup>3193</sup> over 500 Croats left Bapska in the first week of October 1991.<sup>3194</sup> After General ARANĐELOVIĆ ordered an attack on Bapska<sup>3195</sup> and nearby Croat-majority Šarengrad,<sup>3196</sup> JNA artillery positioned across the Danube fired on both villages, targeting churches and Croat-populated areas,<sup>3197</sup> killing at least one civilian.<sup>3198</sup> With **SIMATOVIĆ**'s consent, Unit members deployed with the JNA to attack Bapska,<sup>3199</sup> where Croat homes were burned.<sup>3200</sup> [REDACTED].<sup>3201</sup> When both Bapska and Šarengrad fell, the non-Serbs fled in the only possible direction—to Ilok.<sup>3202</sup>

759. On 9 October 1991, EC observers sent to Western Srem noted that, unlike other towns, Ilok had not yet been attacked.<sup>3203</sup> Their presence protected the town,<sup>3204</sup> though the JNA issued ultimatums to Ilok frequently that month.<sup>3205</sup> As the population swelled as survivors of the attacks on nearby towns fled towards Ilok,<sup>3206</sup> civilians who attempted to leave for any reason, including securing humanitarian aid, were captured and detained.<sup>3207</sup> Some were killed by a JNA patrol despite ARANĐELOVIĆ's assurances otherwise.<sup>3208</sup> Rather than consider the Ilok representatives' proposals, ARANĐELOVIĆ and his proxies provided false justifications for their use of force, demonstrating reckless

<sup>3191</sup> KRALJEVIĆStipan:[P02603](#), T.5381-5382; KRALJEVIĆStipan:T.21-22,33(22-Aug-2018); [REDACTED]; SAVIĆBorivoje:[P00449](#), para.153; [REDACTED]; [REDACTED]; [REDACTED]; [2D00103](#); ANASTASIJEVIĆDejan:[P02423](#), para.86-88; VASILJEVIĆAleksandar:T.17(31-Jan-2019); BOGUNOVIĆBorislav:[P02718](#), para.87; [P00476](#), p.3.

<sup>3192</sup> SAVIĆBorivoje:[P00449](#), para.193; [REDACTED].

<sup>3193</sup> Cross-reference Section [II.F.2\(h\)\(iii\)](#).

<sup>3194</sup> [P02608](#), p.4; KRALJEVIĆStipan:[P02603](#), T.5329-5330.

<sup>3195</sup> Cross-reference Section [II.F.2\(h\)\(iii\)](#).

<sup>3196</sup> KRALJEVIĆStipan:[P02603](#), T.5327; [P02625](#)(00:01:45-00:01:56), p.1; KRALJEVIĆStipan:[P02601](#), p.3; BIJAKJakub:[P00595](#), p.135.

<sup>3197</sup> [P00487](#), p.7,11,13 .

<sup>3198</sup> See e.g. KRALJEVIĆStipan:T.19(22-Aug-2018); [P02625](#)(00:01:45-00:01:56), p.1; [P02605](#); KRALJEVIĆStipan:[P02603](#), T.5327; KRALJEVIĆStipan:[P02601](#), p.3; [REDACTED].

<sup>3199</sup> Cross-reference Section [II.F.2\(h\)\(ii\)](#).

<sup>3200</sup> [P00487](#), p.7,11.

<sup>3201</sup> Cross-reference Section [II.F.2\(h\)\(iii\)](#).

<sup>3202</sup> KRALJEVIĆStipan:[P02603](#), T.5328; [P00487](#), p.11; [REDACTED].

<sup>3203</sup> [P02605](#).

<sup>3204</sup> KRALJEVIĆStipan:T.23(22-Aug-2018).

<sup>3205</sup> [P02608](#), p.2; KRALJEVIĆStipan:[P02603](#), T.5347-5348; [P01977](#); [P02607](#); BOGUNOVIĆBorislav:[P02720](#), T.6071-6072.

<sup>3206</sup> [P00487](#), p.9-14; KRALJEVIĆStipan:[P02601](#), p.3; KRALJEVIĆStipan:[P02603](#), T.5331-5333; [P02605](#).

<sup>3207</sup> KRALJEVIĆStipan:[P02603](#), T.5331-5332.

<sup>3208</sup> KRALJEVIĆStipan:[P02601](#), p.5-6; KRALJEVIĆStipan:[P02603](#), T.5356-5357.

disregard for civilian life.<sup>3209</sup> They ensured that for non-Serbs, either leaving Ilok or accepting an ultimatum—falsely styled as an “agreement”—were the only permissible options, threatening retaliatory measures.<sup>3210</sup>

760. Echoing HADŽIĆ’s threats,<sup>3211</sup> and having applied disproportionate force in successive attacks against nearby villages, ARANĐELOVIĆ threatened that he would “level Ilok to the ground” if its people did not agree to surrender weapons.<sup>3212</sup> Facing a humanitarian crisis caused by the influx of refugees from the surrounding area,<sup>3213</sup> and the audible bombardment of Vukovar,<sup>3214</sup> representatives negotiated for Ilok’s residents, who had to choose between abandoning their homes alive, or remaining and risking death: “They were being asked to give up their homes, their jobs, their lives with no hope for the future except perhaps to live”.<sup>3215</sup> Between around 6 and 12 October 1991, the JNA cut off Ilok’s electricity and water supply.<sup>3216</sup> Residents had limited medical supplies and personnel, putting the entire community of Ilok “under extreme stress”.<sup>3217</sup> By referendum, Ilok’s majority announced that they had no choice but to leave.<sup>3218</sup> With EC monitors observing, Ilok’s representatives told ARANĐELOVIĆ that their departure was involuntary.<sup>3219</sup> On 14 October, ARANĐELOVIĆ presented Ilok’s citizens with an already-drafted “agreement” containing an inaccurate statement that they wished to leave,<sup>3220</sup> then ordered JNA units to remove them on 17 October 1991.<sup>3221</sup>

761. After being screened by the JNA and local Serbs—in the presence of HADŽIĆ’s notorious SNB—approximately 8,000 non-Serbs left Ilok that day.<sup>3222</sup> Most people

<sup>3209</sup> See e.g. KRALJEVIĆStipan:[P02603](#), T.5343,5345; KRALJEVIĆStipan:T.28(22-Aug-2018).

<sup>3210</sup> [P02607](#), p.1; [P02608](#), p.5; KRALJEVIĆStipan:[P02603](#), T.5340,5442-5344; KRALJEVIĆStipan:[P02601](#), p.4; KRALJEVIĆStipan:T.3-4(23-Aug-2018).

<sup>3211</sup> [P02608](#), p.4.

<sup>3212</sup> KRALJEVIĆStipan:[P02601](#), p.5. See [P01977](#).

<sup>3213</sup> KRALJEVIĆStipan:[P02603](#), T.5331-5333; [P02605](#); [P02628](#), p.2-3; [P00487](#), p.9.

<sup>3214</sup> [P02628](#), p.2-3.

<sup>3215</sup> KRALJEVIĆStipan:[P02601](#), p.5; KRALJEVIĆStipan:[P02603](#), T.5344-5345,5347-5348; KRALJEVIĆStipan:T.33-34(22-Aug-2018); KRALJEVIĆStipan:T.49,63-64(23-Aug-2018); [P02628](#), p.2-3; [P02608](#), p.6,8; BOGUNOVIĆBorislav:[P02720](#), T.6071-6072.

<sup>3216</sup> KRALJEVIĆStipan:[P02601](#), p.3; KRALJEVIĆStipan:T.66-67(23-Aug-2018); [P02605](#).

<sup>3217</sup> [P02605](#); KRALJEVIĆStipan:[P02603](#), T.5331-5335.

<sup>3218</sup> KRALJEVIĆStipan:[P02601](#), p.5; KRALJEVIĆStipan:[P02622](#), p.1; KRALJEVIĆStipan:[P02603](#), T.5349,5352; [P02610](#); [P02611](#); [REDACTED]; [P02628](#), p.2; [P00487](#), p.9,14-15. See [REDACTED].

<sup>3219</sup> KRALJEVIĆStipan:[P02601](#), p.5-6; KRALJEVIĆStipan:[P02603](#), T.5354; KRALJEVIĆStipan:T.34(22-Aug-2018).

<sup>3220</sup> KRALJEVIĆStipan:[P02603](#), T.5353-5354; [2D00099](#).

<sup>3221</sup> [P03289](#).

<sup>3222</sup> BOGUNOVIĆBorislav:[P02720](#), T.6071-6072; [P02608](#), p.9; [P00487](#), p.9; KRALJEVIĆStipan:[P02603](#), T.5347-5348,5362-5365; KRALJEVIĆStipan:[P02601](#), p.6; KRALJEVIĆStipan:T.34-37(22-Aug-2018);

travelled through Serbia before entering Croatia;<sup>3223</sup> some were sent to prison camps.<sup>3224</sup> HADŽIĆ's SAO-SBWS authorities gave Serbs from Eastern and Western Slavonia permission to move into some of the newly vacant homes.<sup>3225</sup>

(c) Scheduled Murders Committed in Furtherance of Expulsion and Persecution of non-Serbs

(i) Dalj

a. Murder of 11 non-Serb detainees<sup>3226</sup>

762. On 21 September 1991, HADŽIĆ, ARKAN, and approximately 20 SDG arrived at the Dalj police station, where Croats were being detained.<sup>3227</sup> They released two detainees known to Serbs, one of whom HADŽIĆ personally accompanied.<sup>3228</sup> ARKAN's men removed and shot the remaining 11 non-Serbs.<sup>3229</sup>

763. Dalj police commander Željko ČIZMIĆ documented the abductions,<sup>3230</sup> [REDACTED].<sup>3231</sup> [REDACTED].<sup>3232</sup> SAO-SBWSMUP Minister BOGUNOVIĆ, KOJIĆ<sub>(DB)</sub>, [REDACTED] knew of but failed to investigate the incident.<sup>3233</sup>

764. In 1998 or 1999, the remains of the 11 prisoners taken by ARKAN were exhumed in Čelije and Daljski Atar,<sup>3234</sup> where bodies of other victims killed by the SDG were also found.<sup>3235</sup>

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KRALJEVIĆStipan:[P02622](#), p.1; [P02613](#); [P01153](#); [P01101](#); [REDACTED]; [REDACTED]; [REDACTED].

<sup>3223</sup> KRALJEVIĆStipan:T.34-35(22-Aug-2018); [REDACTED].

<sup>3224</sup> KRALJEVIĆStipan:[P02601](#), p.6; KRALJEVIĆStipan:[P02603](#), T.5365; [P02614](#); KRALJEVIĆStipan:T.56-57(23-Aug-2018); [P02608](#), p.8-9.

<sup>3225</sup> [2D00005](#); [2D00101](#); [2D00102](#), p.1; [REDACTED]; [2D00894](#), p.2.

<sup>3226</sup> Indictment, para.36. *Cross-reference* AnnexC.

<sup>3227</sup> [P00551](#); [REDACTED]. See ŠUTALOŁuka:[P01834](#), p.11.

<sup>3228</sup> ŠUTALOŁuka:[P01836](#), T.25575; ŠUTALOŁuka:[P01834](#), p.11-13; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3229</sup> ŠUTALOŁuka:[P01836](#), T.25575; [P00551](#); [REDACTED]; [P00593](#), p.1; RFJ-113:T.59(26-Sep-2017); [P01840](#).

<sup>3230</sup> [P00551](#); [REDACTED].

<sup>3231</sup> [REDACTED].

<sup>3232</sup> [REDACTED]; [REDACTED].

<sup>3233</sup> BOGUNOVIĆBorislav:[P02718](#), para.89; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3234</sup> [REDACTED]; BILIĆVišnja:[P00597](#), p.27.

<sup>3235</sup> *Cross-reference* Section [III.B.2.](#)(c)(ii)a-b.

b. Murder of 28 non-Serb detainees<sup>3236</sup>

765. Two weeks later, on 4 October 1991, ARKAN and his men returned to the Dalj police station looking for the SAO-SBWS TO's Milorad STRIČEVIĆ.<sup>3237</sup> They removed around 28 prisoners, shot them, and dumped their bodies in the Danube.<sup>3238</sup>

766. ČIZMIĆ prepared another report and delivered it to ZAVIŠIĆ and other officials on 5 October 1991.<sup>3239</sup> STRIČEVIĆ signed a certificate stating that he had removed the prisoners.<sup>3240</sup> Dalj's civilian authorities and BADŽA's SAO-SBWS TO had jurisdiction over ARKAN's crimes in Dalj,<sup>3241</sup> [REDACTED].<sup>3242</sup> [REDACTED].<sup>3243</sup> [REDACTED].<sup>3244</sup>

767. Following public outrage about the bodies floating in the Danube,<sup>3245</sup> ARKAN publicly claimed responsibility for the killings—confident that he would not be held accountable—and agreed to bury the bodies next time.<sup>3246</sup>

(ii) Erdut

a. Murder of 12 non-Serb detainees<sup>3247</sup>

768. On 9 November 1991, soldiers dressed in JNA, police and SDG uniforms rounded up at least nine ethnic Hungarians and Croats from the Erdut region and detained them at ARKAN's Erdut training centre.<sup>3248</sup> [REDACTED]. They shot the detainees the next day.<sup>3249</sup> [REDACTED].<sup>3250</sup>

769. Days later, SNB members murdered three ethnic Hungarian civilians—immediate family members of an ethnic Hungarian father and son who had been executed on

<sup>3236</sup> Indictment, para.37. *See* Prosecution Pre-Trial Brief, para.140. *Cross-reference* AnnexC.

<sup>3237</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00578](#); [P01195](#), p.2; [P00593](#), p.1; [P01198](#).

<sup>3238</sup> [REDACTED]; [P00550](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3239</sup> [P00578](#); [REDACTED].

<sup>3240</sup> [P00550](#).

<sup>3241</sup> VASIJEVIĆAleksandar:T34-35(5-Feb-2019).

<sup>3242</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00578](#).

<sup>3243</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3244</sup> [REDACTED].

<sup>3245</sup> [REDACTED]; [REDACTED].

<sup>3246</sup> [REDACTED]; [REDACTED].

<sup>3247</sup> Indictment, para.38. *Cross-reference* AnnexC.

<sup>3248</sup> [REDACTED]; [REDACTED]; [REDACTED]. *See* [REDACTED]; [REDACTED].

<sup>3249</sup> [REDACTED].



9 November. [REDACTED] a family member had made repeated enquiries about her husband and son, and contacted international organisations regarding their disappearance. SNB members [REDACTED] killed them and threw their bodies in a well.<sup>3251</sup>

770. [REDACTED].<sup>3252</sup>

771. The bodies of the victims were later found in mass graves in Čelije, a village sealed off by ARKAN's men,<sup>3253</sup> Daljski Atar and Borovo.<sup>3254</sup>

b. Murder of 5 Croat detainees<sup>3255</sup>

772. On 11 November 1991, ARKAN's men arrested a group of men in Klisa.<sup>3256</sup> They [REDACTED] and detained [REDACTED] five Croats, along with two Croats arrested in Dalj and Bijelo Brdo [REDACTED].<sup>3257</sup> [REDACTED] and his men interrogated and beat the detainees.<sup>3258</sup> They later released two Croats after Serbs intervened on their behalf,<sup>3259</sup> and murdered the remaining five.<sup>3260</sup>

773. [REDACTED].<sup>3261</sup> [REDACTED].<sup>3262</sup> The bodies were found in a mass grave in Čelije.<sup>3263</sup>

c. Murder of 7 non-Serbs<sup>3264</sup>

774. Around Christmas 1991, men in military and camouflage uniforms including ARKAN's men and local SBWS policemen controlled by BADŽA and HADŽIĆ, rounded up non-Serb civilians in Erdut, took them to ARKAN's centre, interrogated and beat them.<sup>3265</sup> Some were never seen again.<sup>3266</sup> Given where the seven victims were

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<sup>3250</sup> [REDACTED].

<sup>3251</sup> [REDACTED].

<sup>3252</sup> [REDACTED].

<sup>3253</sup> [REDACTED].

<sup>3254</sup> [REDACTED]; BILIĆVišnja:[P00597](#), p.27.

<sup>3255</sup> Indictment, para.39. *Cross-reference* AnnexC.

<sup>3256</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3257</sup> [REDACTED].

<sup>3258</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3259</sup> [REDACTED]; [REDACTED].

<sup>3260</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3261</sup> [REDACTED]; [REDACTED].

<sup>3262</sup> [REDACTED].

<sup>3263</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; BILIĆVišnja:[P00597](#), p.28.

<sup>3264</sup> Indictment, para.42. *Cross-reference* AnnexC.

<sup>3265</sup> ANTUNOVIĆZlatko:[P01230](#), T.207-209; ANTUNOVIĆZlatko:[P01229](#), p.6; [REDACTED].

detained before being killed and that their bodies were found in Daljski Atar,<sup>3267</sup> the perpetrators must have been ARKAN's men, SNB members, or other JCE member's tools.

d. Murder of Marija SENAŠI<sup>3268</sup>

775. On 3 June 1992, Marija SENAŠI—a Hungarian relative of the ethnic Hungarians detained and executed on 9 November 1991—was murdered and dumped in a well in Dalj Planina, from where her body was later exhumed.<sup>3269</sup> [REDACTED].<sup>3270</sup> [REDACTED].<sup>3271</sup> [REDACTED].<sup>3272</sup> Prior to her death, ARKAN and his men threatened and physically abused her and forced her to turn over the keys to her brother's restaurant and her car.<sup>3273</sup> The evidence leaves no doubt that [REDACTED] murdered Marija SENAŠI.

(d) Serb Forces continued to persecute and forcibly displace SBWS non-Serbs throughout the Indictment period

776. From the fall of Vukovar until just after UNPROFOR deployed to SBWS territory on 15 May 1992, Serb Forces, including the RSK-MUP and TO, volunteer units and ARKAN's SDG continued to ruthlessly target non-Serbs in order to expel them from Eastern Slavonia.<sup>3274</sup> In a vigorous effort to change the ethnic composition in early 1992, Serb Forces, including the SDG, RSK-MUP, and local TO—and in the presence of JNA soldiers who did not intervene—executed a series of well-prepared, systematic and documented mass expulsions<sup>3275</sup> before UNPROFOR's full deployment, expelling

<sup>3266</sup> ALBERTStana:[P00440](#), p.2-3; MIJIĆAntun:[P01796](#), p.5; [REDACTED]; [P00748](#); [REDACTED].

<sup>3267</sup> BILIĆVišnja:[P00597](#), p.28; [REDACTED].

<sup>3268</sup> Indictment, para.38. *Cross-reference* AnnexC.

<sup>3269</sup> [REDACTED]; [REDACTED]; [REDACTED]; BILIĆVišnja:[P00597](#), p.27.

<sup>3270</sup> [REDACTED].

<sup>3271</sup> [REDACTED].

<sup>3272</sup> [REDACTED].

<sup>3273</sup> [REDACTED]; [P00740](#), p.12.

<sup>3274</sup> See [P00103](#), para.2,14; [REDACTED]; [REDACTED]; ŠUTALOŁuka:[P01834](#), p.13-14; ŠUTALOŁuka:[P01837](#), T.4009; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *Cross-reference* Section [III.B.2\(c\)\(ii\)d.](#)

<sup>3275</sup> [REDACTED]; [REDACTED]; [P00096](#), p.4-6,10; [P00765](#); [REDACTED].

hundreds of Croats and Serbs who had associated with Croats from their homes, stealing their belongings and bussing them out of Eastern Slavonia.<sup>3276</sup>

777. These expulsions were perpetrated using “terrorist methods”: abuse, coercion, property damage, theft and killings.<sup>3277</sup> The homes of those expelled were immediately occupied in an organised manner, indicating the RSK-MUP and local authorities’ involvement or acquiescence.<sup>3278</sup> During meetings on 10 and 11 June 1992 with UNPROFOR, local authorities—including Milan MILANOVIĆ aka MRGUD<sub>(DB)</sub>—made clear that the expelled non-Serbs would not be allowed to return.<sup>3279</sup> When later confronted about the expulsions, HADŽIĆ admitted that non-Serbs were intentionally expelled in line with his an “eye for eye tooth for tooth” belief.<sup>3280</sup>

778. After the Serb takeover of Baranja,<sup>3281</sup> the Unit, SBWS police, and other Serb authorities continued to expel Croats and Hungarians from Baranja until the end of 1995, openly threatening non-Serbs who attempted to resist the pressure to leave with violence, or physically expelling them from their homes.<sup>3282</sup> The discriminatory legislation passed by the Beli Manastir Executive Council in September 1991<sup>3283</sup> created an environment ripe for crimes against non-Serbs.<sup>3284</sup> Local Serb forces blew up the Beli Manastir Catholic church, threatened, beat, robbed, imprisoned, shot and/or killed non-Serbs, and forced them to do hard labour<sup>3285</sup>—all with the aim of forcing non-Serbs to leave Baranja to accommodate Serbs from Serbia or BiH.<sup>3286</sup> After a non-Serb was murdered, several non-Serb households would flee Baranja.<sup>3287</sup> [REDACTED].<sup>3288</sup>

<sup>3276</sup> ANTUNOVIĆZlatko:[P01229](#), p.6,8; ANTUNOVIĆZlatko:[P01230](#), T.209-212; ALBERTStana:[P00440](#), p.4; [REDACTED]; [REDACTED]; [REDACTED]; [P01238](#); [P00096](#), p.3-6,9-11; [P00097](#), p.1; [REDACTED]. See BIJAKJakub:T.41(3-Oct-2017); BIJAKJakub:[P00595](#), p.104,106-107,110,137.

<sup>3277</sup> [P00103](#), para.14-15; [REDACTED]; [P00107](#), p.4; [P00105](#), p.22,27.

<sup>3278</sup> [P00103](#), para.15,17; [REDACTED]; [REDACTED].

<sup>3279</sup> [P00527](#), p.2-3.

<sup>3280</sup> [1D00700](#), p.3.

<sup>3281</sup> Cross-reference Section [II.F.2\(h\)\(ii\)](#)

<sup>3282</sup> [REDACTED]; [REDACTED]; [P00164](#), p.5; [P00165](#), p.1,3,6; WILSONJohn:T.59-60(27-Jun-2017); [REDACTED]; [P00516](#), p.1-2; [P00105](#), p.5-7; [P00124](#), p.26; [REDACTED].

<sup>3283</sup> Cross-reference Section [III.B.2\(b\)\(ii\)](#).

<sup>3284</sup> [REDACTED]; RFJ-151:T.100(21-Sep-2017).

<sup>3285</sup> RFJ-151:T.11-12(19-Sep-2017); RFJ-151:T.102(21-Sep-2017); [P00547](#), p.1-2,11; [P00106](#), p.2; [P00516](#).

<sup>3286</sup> RFJ-151:T.9-10(19-Sep-2017); RFJ-151:T.2-3(20-Sep-2017); [P00547](#), p.2; [P00164](#), p.5.

<sup>3287</sup> [REDACTED]. See [P00164](#), p.5.

<sup>3288</sup> Cross-reference Section [II.F.2\(f\)\(ii\)c](#).

779. Serb authorities in the RSK and Serbia resisted efforts by non-Serbs to return by refusing to disarm the Serb population, insisting that returns could not take place, and threatening military action if returns were attempted.<sup>3289</sup> Local Serb authorities and newly-arrived Serbs pressured non-Serbs in various ways, including by giving Serbs the jobs of non-Serbs.<sup>3290</sup> Noting that, following an influx of Serbs and the continued expulsion of minorities, the composition of many villages was—by mid-June 1992—almost 100% Serb, UNHCR concluded that a *de facto* situation was being put in place which “seems irreversible”.<sup>3291</sup> Months later, in October 1992, ECMM came to the same conclusion as the expulsions continued: that the local authorities condoned ethnic cleansing and “the plan may be to make BARANJA completely Serb populated”.<sup>3292</sup> The expulsion and resettlement policies were often referred to as the “Serbianization” of the region.<sup>3293</sup>

780. As a consequence of these crimes, the local non-Serbs had no choice but to flee the area where they were lawfully present, thus amounting to the crime of forcible transfer and/or deportation.<sup>3294</sup> By 1992, approximately 70% of the population in Baranja was Serb.<sup>3295</sup> By December 1995, almost half the pre-war, non-Serb population of Beli Manastir had been displaced; 81.6% in Bilje; and 55.9% in Darda.<sup>3296</sup>

781. Following the Western Srem takeovers, the remaining non-Serbs faced extreme hardship; many who remained were forced to leave,<sup>3297</sup> “entire ... villages [were] being expelled”.<sup>3298</sup>

782. Despite [REDACTED], the SBWS police tolerated and committed serious crimes.<sup>3299</sup> [REDACTED].<sup>3300</sup> Notably, the SBWS police, including SMUP members

<sup>3289</sup> [P00108](#), p.1-2; [P00107](#), p.3; [P00109](#), p.1-2; [P00164](#), p.5; [REDACTED].

<sup>3290</sup> [REDACTED]; [1D00004](#), p.2-3.

<sup>3291</sup> [P00164](#), p.4.

<sup>3292</sup> [P00547](#), p.4.

<sup>3293</sup> [P00125](#), p.15.

<sup>3294</sup> See Indictment, para.64-66.

<sup>3295</sup> [REDACTED]. See [P01381](#), p.2,6.

<sup>3296</sup> BIJAKJakub:[P00595](#), p.39,81-83. In Grabovac, which was approximately 90% non-Serb before the conflict, only 5-10% of the original villagers remained by 1992. [REDACTED].

<sup>3297</sup> KRALJEVIĆStipan:[P02601](#), p.6; KRALJEVIĆStipan:[P02622](#), p.1; DRAČAAco:T.71(28-Nov-2019); [P03354](#).

<sup>3298</sup> [P03394](#), p.6-7,9,12.

<sup>3299</sup> [REDACTED].

<sup>3300</sup> [REDACTED].

therein, participated in and condoned looting, rape, and murder, and [REDACTED].<sup>3301</sup>  
 [REDACTED],<sup>3302</sup> [REDACTED].<sup>3303</sup>

783. The following month, the Ilok JNA unit's civil affairs organ reported to the 1<sup>st</sup> Military District that, instead of securing the safety of individuals and property, the SBWS police engaged in organised theft.<sup>3304</sup> The JNA also emphasized that KNEŽEVIĆ typified the problem by allowing the police to evict local residents, confiscate their property, harass citizens and resettle others in otherwise occupied properties, as well as commit rape.<sup>3305</sup> SMUP police stationed in Tovarnik killed detainees at checkpoints on the road to Šid.<sup>3306</sup> By May 1992, Ilok was described by an international human rights rapporteur as the paradigmatic example of what should not happen in the field of minority protection.<sup>3307</sup>

784. In early 1992, ARKAN sought to expel any non-Serbs remaining in Bapska.<sup>3308</sup> On 19 May 1992, SAO-SBWS police robbed and violently expelled 98 non-Serbs from Čakovci, Cerić, and Mikluševci, forcing them at gunpoint to sign statements saying they were leaving voluntarily.<sup>3309</sup> On 23-24 May, local policemen expelled non-Serbs from Tovarnik,<sup>3310</sup> forcing them to leave their homes at night, leaving behind their property to be looted or handed over to Serb refugees from Croatia.<sup>3311</sup> Fearing for their lives, the non-Serbs did not want to return.<sup>3312</sup>

785. As of mid-1992, the Accused's Unit had the real power in the Ilok region, and international observers repeatedly expressed concern over their crimes against non-Serbs.<sup>3313</sup> The Unit and others continued to commit such crimes in Western Srem and Ilok into 1995,<sup>3314</sup> including expulsions from<sup>3315</sup> and murders in Ilok.<sup>3316</sup>

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<sup>3301</sup> [REDACTED].

<sup>3302</sup> [P03250](#).

<sup>3303</sup> [REDACTED].

<sup>3304</sup> [P03357](#), p.1. See [P03369](#), p.2.

<sup>3305</sup> [P03357](#), p.1.

<sup>3306</sup> [REDACTED].

<sup>3307</sup> [P02615](#), p.5.

<sup>3308</sup> [REDACTED]; [REDACTED].

<sup>3309</sup> [P00175](#), p.1-3,9,12,16,18. See [P03356](#); BIJAKJakub:[P00595](#), p.127,131.

<sup>3310</sup> [P02414](#), p.8-9; [REDACTED]; [REDACTED]. See [P03354](#); [1D00702](#), p.1; BIJAKJakub:[P00595](#), p.136.

<sup>3311</sup> [P02414](#), p.6,14-18.

<sup>3312</sup> [P02414](#), p.4-6.

<sup>3313</sup> [REDACTED]; [P00102](#), p.2,13; STOPARIĆGoran:[P00796](#), para.70-72; [1D00017](#); [P00127](#);

<sup>3314</sup> [1D00004](#), p.7-9; [P02619](#); [P00816](#), p.3; [P00234](#), p.32-33/[2D00391](#)(duplicates); [P00830](#), p.3.

786. Prior to the conflict, Western Srem was ethnically mixed: the majority of people were Croats and other non-Serbs.<sup>3317</sup> Ilok town was only 7.2% Serb and the surrounding villages of Bapska, Šarengrad, Mohovo, Lovas, Tovarnik, and Ilača had a large majority Croat population.<sup>3318</sup> As a direct consequence of the crimes committed, the local non-Serb population had no choice but to flee these areas where they were lawfully present, thus amounting to the crime of forcible transfer and/or deportation.<sup>3319</sup> By December 1995, huge percentages of the non-Serb, pre-war population were expelled: in Bapska, 82% of the pre-war non-Serb population was displaced; in Ilok, 54.3%; in Lovas, 74%; and in Mohovo, 92.6%.<sup>3320</sup>

(e) The SBWS crimes were committed by perpetrators whose acts furthered the CCP and are attributable to JCE members

787. The Serb Forces' crimes of murder, persecution, forcible transfer, and deportation are attributable to the Accused and other JCE members. Unit members, including those acting under Captain DRAGAN<sub>(DB)</sub>, were tools of the Accused. Members of ARKAN's SDG were tools of ARKAN and the Accused. To the extent that ARKAN and the SDG operated under the command of BADŽA in the SAO-SBWS TO, they were tools of BADŽA. JNA units were tools of ADŽIĆ and KADIJEVIĆ. The SAO-SBWS TO and police were tools of HADŽIĆ and, after his arrival in SBWS, BADŽA. SMUP members operating in SBWS were tools of BADŽA and STANIŠIĆ. The SNB members were HADŽIĆ's tools, as were SBWS and later RSK authorities responsible for the discriminatory legislation effecting forcible transfer and deportation. The SRS volunteers were ŠEŠELJ's tools. Others acted in concert with the Serb Forces above, including other paramilitaries, in the commission of the crimes, which are thus attributable to the Accused and other JCE members.

788. After the SAO-SBWS was incorporated into the RSK, the RSK police and other RSK authorities continued to persecute, murder, and forcibly displace non-Serbs. The

<sup>3315</sup> [P02621](#); KRALJEVIĆStipan:[P02603](#), T.5373-5375; [P02617](#); [P02616](#).

<sup>3316</sup> [P02620](#), p.2-3.

<sup>3317</sup> In addition to Croats, the non-Serb majority included Hungarian, Slovak, Ruthenian, and other communities. BIJAKJakub:[P00595](#), p.10. BIJAKJakub:T.12,14,20-21(3-Oct-2017); [P00594](#), p.3.

<sup>3318</sup> KRALJEVIĆStipan:[P02601](#), p.2; KRALJEVIĆStipan:[P02602](#), para.29; KRALJEVIĆStipan:[P02603](#), T.5313; [REDACTED]; BIJAKJakub:[P00595](#), p.125,129-130,132,135-136.

<sup>3319</sup> See Indictment, para.64-66.

<sup>3320</sup> BIJAKJakub:[P00595](#), p.125-137.

RSK police as well as other RSK authorities were under the command and tools of JCE members MARTIĆ and HADŽIĆ.

## C. The Crimes in BiH

### 1. Bijeljina Crimes<sup>3321</sup>

789. On 31 March 1992, ARKAN's SDG, SRS members, and other Serbian paramilitaries crossed over from Serbia to join locals commanded by MAUZER<sub>(DB)</sub>, as well as the newly-established Serb TO and police, outside Bijeljina. Together, these groups forcibly took control of Bijeljina, expelling the vast majority of the Muslim population and bringing violent implementation of the CCP to BiH. Serbian paramilitary units such as ARKAN's SDG terrorised local Muslims to force them from the territory.<sup>3322</sup> The crimes in Bijeljina were committed with persecutory intent,<sup>3323</sup> made evident by the targeted killings of non-Serb families<sup>3324</sup> the destruction of their property,<sup>3325</sup> and other persecutory acts targeting Muslim community leaders.<sup>3326</sup>

#### (a) The SDG and other Serb Forces forcibly displaced non-Serbs during their takeover of Bijeljina

790. On 31 March 1992, the Accused and fellow JCE members launched their ethnic cleansing campaign to BiH. On SerbianDB orders, ARKAN's SDG, local Popovi-trained Serb volunteers under MAUZER<sub>(DB)</sub>, Bijeljina TO, and SRS volunteers deployed to Bijeljina that evening.<sup>3327</sup> SDG commanders instructed subordinates to capture and eliminate "terrorists in Bijeljina who were ethnic Muslims".<sup>3328</sup>

791. As ARKAN and his forces seized Bijeljina, they started "cleansing" it, killing Muslims and looting their property.<sup>3329</sup> Within hours, ARKAN's forces occupied the Bijeljina bus station and killed a man with a developmental disability.<sup>3330</sup> They then fired

<sup>3321</sup> Indictment, para.22-25,64-66.

<sup>3322</sup> Cross-reference Section [II.F.4\(b\)\(i\)a](#).

<sup>3323</sup> See Indictment, para.22-25.

<sup>3324</sup> [REDACTED]; [REDACTED].

<sup>3325</sup> [REDACTED].

<sup>3326</sup> [REDACTED].

<sup>3327</sup> Cross-reference Section [II.F.4\(b\)\(i\)a](#); Section [II.D.2\(b\)\(iv\)](#). [REDACTED]; [P00431](#), p.2.

<sup>3328</sup> [REDACTED]; [REDACTED].

<sup>3329</sup> MILOVANOVIĆManojlo:[P02934](#), T.4372; [REDACTED].

<sup>3330</sup> [REDACTED]; [P00427](#); [REDACTED].



rockets into a Muslim café before occupying the hospital.<sup>3331</sup> Facing little resistance, ARKAN's forces secured the town on 1 April 1992.<sup>3332</sup> Within three days, Serb flags were raised over Bijeljina's two mosques.<sup>3333</sup>

792. In anticipation of the 4 April 1992 visit of PLAVŠIĆ and other high-ranking BiH officials,<sup>3334</sup> the Serb Forces removed bodies from Bijeljina's streets.<sup>3335</sup> The bodies of 45 non-Serb civilians, including women and children, were collected from streets and houses.<sup>3336</sup> Most had been shot in the chest, mouth, temple, or back of the head, some at close range.<sup>3337</sup> Although the JNA reported that "absolute chaos, anarchy and panic still reign in the town" and that "[r]umours are spreading that Muslims are being slaughtered in Bijeljina and piled in mosques",<sup>3338</sup> when PLAVŠIĆ visited, she repeatedly and publicly praised ARKAN for a job well done,<sup>3339</sup> denying the commission of atrocities.<sup>3340</sup> When she asked ARKAN to hand Bijeljina over to the JNA, however, he refused, saying he had not yet finished his "business" there.<sup>3341</sup>

(b) The SDG and other Serb Forces continued to forcibly displace Bijeljina's non-Serbs through crimes in the years that followed

793. In the following months, ARKAN's SDG, paramilitary groups such as MAUZER's<sub>(DB)</sub> Serb National Guard,<sup>3342</sup> together with Bijeljina's Serb police, terrorised Bijeljina's Muslim residents.<sup>3343</sup> ARKAN's SDG infiltrated the SJB and committed crimes—including murder, rape, looting, and appropriation of property—"on a massive scale".<sup>3344</sup> Using lists compiled [REDACTED],<sup>3345</sup> ARKAN's men went to the homes of wealthy Muslims to demand money; if one refused, they killed a family member.<sup>3346</sup>

<sup>3331</sup> [REDACTED]; [P00432](#).

<sup>3332</sup> [P03352](#), p.1; [2D00152](#)(01:28:04-01:28:26), p.12; [REDACTED]; [REDACTED]. See AF946.

<sup>3333</sup> See AF935. See also [P03177](#), p.2-4; [P01637](#), p.3.

<sup>3334</sup> [P03352](#), p.1.

<sup>3335</sup> See AF941.

<sup>3336</sup> See AF940; AF938. See also [REDACTED]; [REDACTED]; [REDACTED].

<sup>3337</sup> See AF940. See also [P03177](#), p.2,6-8; [P00429](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3338</sup> [P03350](#), p.2-3.

<sup>3339</sup> See AF947-AF948.

<sup>3340</sup> [P02956](#), p.2-3.

<sup>3341</sup> See AF947.

<sup>3342</sup> [2D00089](#), p.9.

<sup>3343</sup> See AF952; AF972; [1D00067](#), p.1-2. See also AF950.

<sup>3344</sup> [P01634](#), p.1-2; [REDACTED]; [P03141](#).

<sup>3345</sup> Cross-reference Section [II.F.4\(a\)\(ii\)b.i](#).

<sup>3346</sup> [REDACTED]. See AF968.

Between April and September 1992, at least 52 persons of mainly Muslim ethnicity were killed by Serb Forces in Bijeljina municipality.<sup>3347</sup>

794. From at least June 1992, Serb Forces transferred non-Serbs from different parts of BiH to Bijeljina's Batković camp,<sup>3348</sup> where they were forced to perform labour, beaten harshly, even to death, and forced to engage in degrading sexual acts with each other in front of other detainees.<sup>3349</sup> Sanitary conditions were poor and detainees were given little food or water.<sup>3350</sup> Non-Serbs were also held in at least six other detention centres in Bijeljina under terrible conditions, including the JNA barracks where soliders regularly beat them.<sup>3351</sup> [REDACTED].<sup>3352</sup> Serb Forces transferred some non-Serb detainees to other detention sites in BiH, Croatia, and Serbia.<sup>3353</sup>

795. As intended, massive numbers of Muslims wished to flee after the initial wave of Bijeljina killings.<sup>3354</sup> SDG member and Bijeljina SDS operative Vojkan ĐURKOVIĆ<sub>(DB)</sub>—[REDACTED]—went to Muslim houses at night, telling occupants they had five minutes to pack, the escorting them to a collection centre where they were searched for valuables.<sup>3355</sup> Muslims were then crammed onto trucks in often-sweltering temperatures and driven to the boundary of Serb-held territory.<sup>3356</sup> [REDACTED].<sup>3357</sup>

796. By the end of June 1992, large numbers of Muslims were driven out by killings, mistreatment, and other abuse.<sup>3358</sup> [REDACTED].<sup>3359</sup> [REDACTED].<sup>3360</sup> [REDACTED].<sup>3361</sup> [REDACTED].<sup>3362</sup> [REDACTED].<sup>3363</sup>

<sup>3347</sup> See AF971. See also [REDACTED]; [REDACTED]

<sup>3348</sup> [REDACTED]; [REDACTED]. See AF953-AF954; AF1121.

<sup>3349</sup> [REDACTED]. See AF957.

<sup>3350</sup> See AF957. See also ĐUKIĆPetar:T.42-43(17-Dec-2019).

<sup>3351</sup> TIHIĆSulejman:[P01865](#), p.16-17; LUKAČDragan:[P02731](#), p.29-30; LUKAČDragan:[P02732](#), T.1706-1707,1791; [REDACTED]. See also AF960.

<sup>3352</sup> [REDACTED]; [REDACTED].

<sup>3353</sup> TIHIĆSulejman:[P01865](#), p.16-18; [REDACTED]. See AF1117.

<sup>3354</sup> [REDACTED]; [REDACTED]. See AF973.

<sup>3355</sup> [REDACTED]; [REDACTED]. See AF969.

<sup>3356</sup> [REDACTED].

<sup>3357</sup> [REDACTED]; [REDACTED].

<sup>3358</sup> [REDACTED]. See also [REDACTED].

<sup>3359</sup> [REDACTED].

<sup>3360</sup> [REDACTED]; [REDACTED]. See AF970.

<sup>3361</sup> [REDACTED].

<sup>3362</sup> [REDACTED]. See also [REDACTED]; AF966-AF967.

<sup>3363</sup> [REDACTED].

(c) Deportation and forcible transfer<sup>3364</sup>

797. The attacks, murders, and other crimes outlined above, had the intended effect of driving large numbers of non-Serbs from Bijeljina. In 1991, Bijeljina municipality had a slight Serb majority with a large Muslim population.<sup>3365</sup> By 1997, the slight Serb majority had expanded to 91.1%, and the population of Muslims and Croats had dwindled to 2.6% and 0.7%, respectively.<sup>3366</sup>

(d) The Bijeljina crimes are attributable to the Accused and other JCE members

798. The Serb Forces' crimes of persecution, forcible transfer, and deportation are attributable to the Accused and other JCE members. SDG members were ARKAN's tools and tools of the Accused. From 12 May 1992, the VRS units were tools of MLADIĆ. SRS volunteers were tools of ŠEŠELJ, and Serb police forces were under the RS-MUP and were tools of M.STANIŠIĆ. The local SDS Crisis Staff members and Bijeljina TO were tools of KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ. MAUZER<sub>(DB)</sub>'s unit and others, including other paramilitaries, acted in concert with these Serb Forces in the commission of the crimes, which are thus attributable to the Accused and other JCE members.

**2. Zvornik Crimes**<sup>3367</sup>

799. In early April 1992, ARKAN and Marko PAVLOVIĆ<sub>(DB)</sub> coordinated with other Serb Forces—including the JNA, local TO, and Serbian paramilitaries—to implement the CCP by murdering, forcibly displacing and persecuting Muslim civilians during and following the takeover of Zvornik and its surrounding villages.<sup>3368</sup> Persecutory intent<sup>3369</sup> is amply demonstrated by ethnic targeting of non-Serb villages<sup>3370</sup> and religious buildings,<sup>3371</sup> use of racial epithets<sup>3372</sup> and Chetnik songs,<sup>3373</sup> and beating of prisoners unable to “pray like Christians”.<sup>3374</sup>

<sup>3364</sup> Indictment, para.64-66.

<sup>3365</sup> TABEAUW: [P02069](#), p.21.

<sup>3366</sup> TABEAUW: [P02069](#), p.23,28; [REDACTED].

<sup>3367</sup> Indictment, para.22-26,62-66.

<sup>3368</sup> Cross-reference Section [II.F.4\(b\)\(i\)b](#).

<sup>3369</sup> See Indictment, para.22-25.

<sup>3370</sup> See e.g. MUJIĆFadil:T.26-27(27-Feb-2018).

<sup>3371</sup> See e.g. [REDACTED].

<sup>3372</sup> See e.g. AF1023.

<sup>3373</sup> See e.g. [P03281](#), p.3.

<sup>3374</sup> See e.g. AF1021.

(a) The SDG and other Serb Forces forcibly displaced and murdered non-Serbs during the Zvornik takeover<sup>3375</sup>

800. By 4 April 1992, tensions in the municipality had increased such that the JNA reported “a real danger that the situation might considerably deteriorate [...] including the threat of inter-ethnic conflicts [...]”<sup>3376</sup> By 6 April, the Zvornik SJB’s Serb members had established a parallel RS-MUP, complete with materiel appropriated from the former SJB and a building shared with the Serb Crisis Staff.<sup>3377</sup> Around the same time, PLAVŠIĆ, KOSTIĆ<sub>(DB)</sub>, and the [REDACTED] brought ARKAN and the SDG,<sup>3378</sup> who began attack preparations along with other Serbian paramilitaries and JNA units who had arrived in Zvornik.<sup>3379</sup>

801. On 6 April 1992, the day BiH independence was recognized,<sup>3380</sup> Zvornik’s Crisis Staff declared a state of war and transferred police and defence duties to the Zvornik TO.<sup>3381</sup> Serb police and paramilitary forces—mainly ARKAN’s men—erected barricades throughout the municipality.<sup>3382</sup> ARKAN’s presence exacerbated tensions and local attitudes towards Muslims.<sup>3383</sup> On 7 April 1992, ARKAN issued an ultimatum to Zvornik’s Muslim representatives requiring them to surrender the town within one hour.<sup>3384</sup> They refused.<sup>3385</sup>

802. On ARKAN’s order,<sup>3386</sup> the attack on Zvornik began the following morning and lasted for only a few hours.<sup>3387</sup> A combination of Serb Forces, including the police, TO, JNA, SRS, SDG, and various other paramilitaries, launched an attack against Zvornik town, which partially originated from inside Serbia.<sup>3388</sup> After [REDACTED],<sup>3389</sup> the JNA

<sup>3375</sup> Indictment, para.62-63. *Cross-reference* AnnexC.

<sup>3376</sup> [P03352](#), p.2.

<sup>3377</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b\(ii\)-\(iii\)](#).

<sup>3378</sup> *Cross-reference* Section [II.D.2\(b\)\(iv\)](#).

<sup>3379</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b.iii](#).

<sup>3380</sup> See AF531; AF766.

<sup>3381</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b.ii](#).

<sup>3382</sup> See AF986.

<sup>3383</sup> [P03353](#), p.1.

<sup>3384</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b.iii](#).

<sup>3385</sup> [2D00152](#)(01:29:39-01:34:28), p.13.

<sup>3386</sup> [P02652](#); [2D00152](#)(01:29:39-01:32:56), p.13; [REDACTED].

<sup>3387</sup> MUJIĆFadil:[P01683](#), para.38; MUJIĆFadil:[P01684](#), para.10; MUJIĆFadil:T.17(27-Feb-2018); OFS-23:T.33-34(15-Sep-2020); [REDACTED]. See AF990.

<sup>3388</sup> [REDACTED]; [REDACTED]; MUJIĆFadil:T.16-17(27-Feb-2018); [P03504](#), p.5; [P03113](#). See AF990. See also [REDACTED]; [REDACTED]; [REDACTED].

<sup>3389</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b.iii](#).

fired artillery from the Serbian side of the Drina,<sup>3390</sup> and sent multiple JNA tanks and soldiers across the river to Zvornik.<sup>3391</sup> By mid-afternoon, Serb Forces broke through,<sup>3392</sup> and by day's end, a Serbian flag was hoisted above the main town mosque.<sup>3393</sup>

803. A group of [REDACTED] Muslims, about half of whom were women and children, had taken shelter in a cellar as the attack began.<sup>3394</sup> On the morning of 9 April 1992, following a loud explosion at the door, approximately 10 masked SDG members<sup>3395</sup> burst into the cellar and ordered all the men outside.<sup>3396</sup> Another group of soldiers who introduced themselves as ŠEŠELJ's men then entered and ordered the women and children out.<sup>3397</sup> As the women and children were led away, they saw the men lined up along the wall of the apartment block with their hands on their heads, and then heard a burst of gunfire.<sup>3398</sup>

804. The Muslim women and children were escorted from their apartment block to the library to join a larger group of people.<sup>3399</sup> ARKAN told them that buses would arrive to pick them up.<sup>3400</sup> ARKAN accompanied the group on the buses to the Karakaj bridge, where some men were removed from the bus before crossing into Serbia.<sup>3401</sup> When the driver asked ARKAN what to do with the rest of the people on the bus, ARKAN responded, "ŠwĆell, just let them go. They'll die of their own accord....We've killed all their children, so they won't last long."<sup>3402</sup> The women and children were heard crying and screaming, "ŠtĆhey're killing over there."<sup>3403</sup>

805. Dozens were murdered during the attack on Zvornik town,<sup>3404</sup> including the [REDACTED] men from the cellar and approximately eight whose bodies the women

<sup>3390</sup> [P01689](#); MUJIĆFadil:T.19(27-Feb-2018).

<sup>3391</sup> OFS-23:T.32-33(15-Sep-2020); [REDACTED]; [REDACTED]; [P01663](#).

<sup>3392</sup> MUJIĆFadil:[P01683](#), para.41; MUJIĆFadil:T.16-17(27-Feb-2018).

<sup>3393</sup> See AF992. [REDACTED] [REDACTED].

<sup>3394</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3395</sup> See [P00429](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P01659](#), p.9. See also [P01662](#); [REDACTED].

<sup>3396</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3397</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3398</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3399</sup> [REDACTED]; [REDACTED].

<sup>3400</sup> [REDACTED]; [REDACTED].

<sup>3401</sup> [REDACTED]; [REDACTED]. See also [P01687](#), p.2.

<sup>3402</sup> [REDACTED]; [REDACTED].

<sup>3403</sup> [REDACTED].

<sup>3404</sup> See AF1034; AF1017.

and children passed.<sup>3405</sup> As one Muslim woman recounted, “every three or four metres, there was someone lying there dead”.<sup>3406</sup> Serb Forces—including ARKAN—conscripted civilians to collect the corpses.<sup>3407</sup> All but one of the approximately 50 bodies collected were those of Muslims, and all appeared to have been killed by automatic weapon fire.<sup>3408</sup>

806. As street battles ensued, civilians—particularly women and children—fled the advance of the Serb Forces.<sup>3409</sup> Many Muslim civilians left the town in the direction of Tuzla;<sup>3410</sup> within several days, some 4,000 refugees from the Zvornik area had gathered there.<sup>3411</sup>

(b) Marko PAVLOVIĆ<sub>(DB)</sub>’s Zvornik TO and other Serb Forces continued to forcibly displace Zvornik’s non-Serb population following the takeover

807. In the aftermath of the Zvornik takeover, the Accused’s asset Marko PAVLOVIĆ<sub>(DB)</sub> led the Zvornik TO and its constituent paramilitary forces in a campaign of violence against Zvornik’s remaining non-Serbs.<sup>3412</sup> These Serb Forces searched Muslim houses<sup>3413</sup> and detained Muslims in numerous locations throughout Zvornik,<sup>3414</sup> where they were beaten, tortured, and killed.<sup>3415</sup> For example, after the takeover, hundreds of Muslims were detained in catastrophic conditions and killed by the Yellow Wasps, operating under the Zvornik TO, at the Karakaj technical school.<sup>3416</sup> Between April and June 1992, a total of approximately 507 Muslim civilians were killed by Serb Forces in Zvornik municipality,<sup>3417</sup> including Muslim prisoners killed during Captain

<sup>3405</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P01687](#), p.2; [P01688](#), p.2. *See also* Indictment, para.62. *Cross-reference* AnnexC.

<sup>3406</sup> [REDACTED].

<sup>3407</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b.iii.](#)

<sup>3408</sup> [REDACTED]; [REDACTED]. *See also* AF993-AF994.

<sup>3409</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b.](#) [P03360](#), p.6; [P01689](#); MUJIĆFadil:T.17-19(27-Feb-2018).

<sup>3410</sup> *See* AF1034.

<sup>3411</sup> [P03364](#), p.1.

<sup>3412</sup> *Cross-reference* Section [II.F.4\(b\)\(i\)b.iv.](#)

<sup>3413</sup> *See* AF1015. *See also* [P01639](#), p.3.

<sup>3414</sup> *See* AF1016; AF1018; AF1032; AF1037-AF1038; [P01826](#); [P01832](#); [REDACTED]; [REDACTED].

<sup>3415</sup> *See* AF1019-AF1023; [P01829](#); [2D00122](#), p.2-3; [REDACTED].

<sup>3416</sup> [REDACTED]; [P03159](#), p.1,8-9;[REDACTED]; [P01828](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *See also* AF1039.

<sup>3417</sup> *See* AF1033. [REDACTED] [REDACTED]; [REDACTED].

DRAGAN<sub>(DB)</sub>'s training at the Divič camp.<sup>3418</sup> Forces trained by Captain DRAGAN<sub>(DB)</sub> also engaged in looting and rape.<sup>3419</sup>

808. Yellow Wasp members also tortured detainees in grotesque ways, often involving sexual violence. At the Alhos factory, Dušan VUČKOVIĆ aka REPIĆ, cut a prisoner's ear off during questioning, and approximately 70 additional prisoners were taken to a gravel pit and forced to perform oral sex on each other before being shot and buried in the pit by SDG members under PEJIĆ<sub>(DB)</sub>.<sup>3420</sup> In June 1992, at the Čelopek Dom Kulture,<sup>3421</sup> members of the Yellow Wasps cut off prisoners' fingers and mutilated them sexually, forcing prisoners to eat the severed body parts and killing two detainees who could not bring themselves to do so.<sup>3422</sup> REPIĆ forced all the prisoners to strip and forced family members to perform sexual acts on each other.<sup>3423</sup>

809. Days later, REPIĆ returned to the Dom Kulture alone and shot approximately 20 detainees dead while wounding 22 others.<sup>3424</sup> He then ordered the wounded survivors to sing Chetnik songs and to kick and beat each other before again firing at random into the mass, aiming at their heads.<sup>3425</sup> He also stabbed numerous other detainees in the heart.<sup>3426</sup> REPIĆ<sup>3427</sup> and other [REDACTED] raped many Muslim women following the fall of Zvornik.<sup>3428</sup>

810. The Yellow Wasps also set up checkpoints where they confiscated vehicles, alcohol, and other goods,<sup>3429</sup> which were then taken to Serbia.<sup>3430</sup> PAVLOVIĆ<sub>(DB)</sub> and other members of the Serb municipal government exported vehicles stolen from Muslims to Serbia.<sup>3431</sup>

<sup>3418</sup> Cross-reference Section [II.E.4\(d\)\(i\)](#); Section [II.F.4\(b\)\(i\)b.iv](#).

<sup>3419</sup> [2D00083](#), p.5.

<sup>3420</sup> [2D00122](#), p.2; [P01688](#), p.2; [P03281](#), p.2; [P01687](#), p.2. [REDACTED].

<sup>3421</sup> [P01831](#); [REDACTED].

<sup>3422</sup> See AF1026; [REDACTED]. See also AF1024-AF1025; AF1028.

<sup>3423</sup> [2D00122](#), p.2. See AF1027.

<sup>3424</sup> [P01688](#), p.3; [P03281](#), p.2. See AF1029. See also [2D00122](#), p.2; [P01687](#), p.3; [P01639](#), p.3; [P03213](#), p.3.

<sup>3425</sup> [P01688](#), p.4; [REDACTED].

<sup>3426</sup> [P01688](#), p.4.

<sup>3427</sup> [P01688](#), p.4-5; [REDACTED]; [2D00122](#), p.3.

<sup>3428</sup> [REDACTED]. See also [REDACTED]; [2D00083](#), p.5.

<sup>3429</sup> [P01648](#), p.1; [P01640](#), p.1; [P01642](#), p.1; [P01643](#), p.1. See also [2D00121](#), p.3-5; [2D00083](#), p.5.

<sup>3430</sup> [P01648](#), p.2; [P03141](#); [REDACTED].

<sup>3431</sup> [REDACTED]; [P01642](#), p.2; [REDACTED]; [REDACTED].



811. This rampant criminality continued even after [REDACTED],<sup>3432</sup> [REDACTED]<sup>3433</sup> [REDACTED].<sup>3434</sup>

812. After taking Zvornik, Serb Forces moved south towards Divič.<sup>3435</sup> By 18 April 1992, the Zvornik TO had established control over the Zvornik environs, which was “being mopped up”.<sup>3436</sup> Having declared all rental agreements made prior to the attack on Zvornik void,<sup>3437</sup> the Serb municipal government appropriated “deserted and vacant residential and business properties”<sup>3438</sup> in the municipality and established a “real estate exchange agency” authorised to execute exchanges of real estate between Zvornik residents and other municipalities.<sup>3439</sup> Muslims were also forced to sign a pledge of loyalty to the Serb authorities in order to remain employed.<sup>3440</sup>

813. In quick succession, Serb Forces attacked nearby Muslim villages and forcibly removed or detained their inhabitants.<sup>3441</sup> After the Muslim residents of Đulići surrendered their weapons, PAVLOVIĆ<sub>(DB)</sub>’s forces took control, detaining many of the men in the Karakaj technical school,<sup>3442</sup> where many were killed by the Yellow Wasps, as discussed above.<sup>3443</sup> Women and children were separated and taken to Muslim-held territory.<sup>3444</sup> [REDACTED].<sup>3445</sup>

814. Similarly, even though its inhabitants were unarmed civilians, Divič—a 100% Muslim village—was attacked in the days following 18 April 1992, and its residents were taken to three separate detention locations including the Dom Kultur in Čelopek.<sup>3446</sup> Divič’s citizens were constantly told to surrender their weapons and leave the village while a loudspeaker issued threats from the Serb command post across the river Drina in Mali Zvornik.<sup>3447</sup> In late April or early May, Serb Forces demanded Divič’s surrender,

<sup>3432</sup> Cross-reference Section [II.F.4\(b\)\(i\)b.v.](#)

<sup>3433</sup> Cross-reference Section [II.F.4\(a\)\(ii\)b.i.](#)

<sup>3434</sup> [REDACTED].

<sup>3435</sup> Cross-reference Section [II.F.4\(b\)\(i\)b.iv.](#)

<sup>3436</sup> [P03114](#), p.2.

<sup>3437</sup> [P03565](#), p.8-9. See AF997.

<sup>3438</sup> [P03565](#), p.16.

<sup>3439</sup> OFS-23:T.8(15-Sep-2020); [REDACTED]. See AF998.

<sup>3440</sup> See AF1000.

<sup>3441</sup> See AF1035; AF995; OFS-23:T.34-35(15-Sep-2020); [REDACTED].

<sup>3442</sup> See AF991; AF999; AF1036; [REDACTED]; [REDACTED].

<sup>3443</sup> Cross-reference Section [III.C.2\(b\)](#).

<sup>3444</sup> [REDACTED]; [REDACTED]. See AF1036.

<sup>3445</sup> [REDACTED].

<sup>3446</sup> [P01687](#), p.3; MUJIĆFadil:T.26(27-Feb-2018).

<sup>3447</sup> See AF1003.

but before the deadline had expired, they attacked the village.<sup>3448</sup> At the end of May 1992, members of the Yellow Wasps forced hundreds of Divič's remaining residents—including women, children, and elderly—onto buses and told them they would be taken to Muslim territory.<sup>3449</sup> That day, the Zvornik TO received an order from a JNA commander stating that the “moving out of the Muslim population must be organised and coordinated with the municipalities through which the moving is carried out”.<sup>3450</sup>

815. [REDACTED] Kozluk, a Muslim-majority village north of Zvornik.<sup>3451</sup> [REDACTED].<sup>3452</sup> [REDACTED].<sup>3453</sup> [REDACTED].<sup>3454</sup> However, in late June, the Zvornik TO—under PAVLOVIĆ<sub>(DB)</sub>'s command—attacked Kozluk.<sup>3455</sup> [REDACTED],<sup>3456</sup> PAVLOVIĆ<sub>(DB)</sub>, GRUJIĆ, and a large number of Serb soldiers and paramilitary units entered Kozluk.<sup>3457</sup> [REDACTED].<sup>3458</sup> PAVLOVIĆ<sub>(DB)</sub> ordered that the Muslim population be deported.<sup>3459</sup> [REDACTED],<sup>3460</sup> [REDACTED].<sup>3461</sup>

816. [REDACTED].<sup>3462</sup> In front of Kozluk's [REDACTED], Muslims were forced to sign statements giving up their property,<sup>3463</sup> which was either stolen or later given to Serbs arriving from elsewhere.<sup>3464</sup> [REDACTED].<sup>3465</sup> [REDACTED],<sup>3466</sup> [REDACTED].<sup>3467</sup> [REDACTED].<sup>3468</sup> The SMUP supplied the convoy with the necessary passports to cross the borders.<sup>3469</sup> That day, approximately 1,800 people were

<sup>3448</sup> See AF1004.

<sup>3449</sup> See AF1006; MUJIĆFadil:T.27(27-Feb-2018).

<sup>3450</sup> [P01645](#).

<sup>3451</sup> [REDACTED]; MUJIĆFadil:T.26(27-Feb-2018).

<sup>3452</sup> [REDACTED]; [REDACTED].

<sup>3453</sup> [REDACTED].

<sup>3454</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3455</sup> [REDACTED]). See AF1011. [REDACTED].

<sup>3456</sup> [REDACTED]; [REDACTED].

<sup>3457</sup> See AF1012. [REDACTED]; [REDACTED]; [REDACTED].

<sup>3458</sup> [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>3459</sup> [REDACTED]; [REDACTED]; [P01646](#), p.1-2. [REDACTED]; [P01674](#).

<sup>3460</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3461</sup> [REDACTED]; [REDACTED]. See AF1012. The Muslim exiles were permitted no personal belongings: See AF1012; [REDACTED].

<sup>3462</sup> [REDACTED]; [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>3463</sup> [REDACTED]; [REDACTED]. See also AF1012.

<sup>3464</sup> [REDACTED]; OFS-23:T.8(15-Sep-2020).

<sup>3465</sup> [REDACTED].

<sup>3466</sup> [REDACTED].

<sup>3467</sup> [REDACTED]; [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>3468</sup> [REDACTED]; [REDACTED].

<sup>3469</sup> [P01676](#); [REDACTED]. [REDACTED]. Indeed, it is evident from the passports themselves that they were supplied by the SMUP: See [P01676](#), p.9(p.12(BCS)).

deported from Kozluk [REDACTED].<sup>3470</sup> [REDACTED]<sup>3471</sup> operating under PAVLOVIĆ<sub>(DB)</sub>.<sup>3472</sup>

(c) Deportation and forcible transfer<sup>3473</sup>

817. Through the attacks, murders, and other crimes outlined above, Serb Forces expelled Muslims from Zvornik. At a meeting held the week after the attack on Kozluk, attended by both KARADŽIĆ and MLADIĆ, GRUJIĆ and PAVLOVIĆ<sub>(DB)</sub> boasted of how effectively they had replaced non-Serbs in the municipality with Serbs.<sup>3474</sup> By 1997, the percentage of Zvornik's Muslim population had declined precipitously to 13.3% despite having been 69.2% before the conflict, while the Serb population had risen from 38% to 84.2%.<sup>3475</sup> Over 30,000 Muslims were displaced.<sup>3476</sup>

(d) The Zvornik crimes are attributable to the Accused and other JCE members

818. The Serb Forces' crimes of murder, persecution, forcible transfer, and deportation are attributable to the Accused and other JCE members. SDG members were tools of ARKAN and tools of the Accused. Captain DRAGAN<sub>(DB)</sub> and Unit members with him were tools of the Accused. PAVLOVIĆ<sub>(DB)</sub>, the Zvornik TO commander, was also a tool of the Accused, as were the various forces under his command, in the Zvornik TO. JNA members were tools of ADŽIĆ and MILOŠEVIĆ. From 12 May 1992, the VRS units were tools of MLADIĆ. SRS volunteers were tools of ŠEŠELJ, and Serb police forces, were under the RS-MUP and were tools of M.STANIŠIĆ. The local SDS Crisis Staff was a tool of KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ. Others, including other paramilitaries taking part in the Zvornik takeover and subsequent crimes, acted in concert with ARKAN and the Serb Forces above in the commission of the crimes, which are thus attributable to the Accused and other JCE members.

<sup>3470</sup> [REDACTED]; [REDACTED]. See AF1013.

<sup>3471</sup> [REDACTED]. [REDACTED] [REDACTED] [REDACTED]. See also [P03151](#). As a result of the deportations, no Muslims remained in the Šepak area: MUJIĆFadil:T.27(27-Feb-2018).

<sup>3472</sup> Cross-reference AnnexA.

<sup>3473</sup> Indictment, para.64-66.

<sup>3474</sup> Cross-reference Section [II.F.4\(b\)\(i\)b.iv](#). See also AF1009; [REDACTED].

<sup>3475</sup> TABEAUWwa:[P02069](#), p.21,23,28; [REDACTED].

<sup>3476</sup> TABEAUWwa:[P02069](#), p.28.

### 3. Bosanski Šamac Crimes<sup>3477</sup>

819. In mid-April 1992, **SIMATOVIĆ** deployed the Unit and Bosanski Šamac locals trained at Pajzoš—the “Pajzoš-trained Red Berets”—to take over Bosanski Šamac—a strategically significant municipality along the Posavina Corridor<sup>3478</sup>—in furtherance of the CCP. To this end, veteran Unit members leading the Pajzoš-trained Red Berets and coordinating with the JNA, local TO, and police forcibly transferred, deported, and murdered the non-Serb population with persecutory intent,<sup>3479</sup> as demonstrated through racial epithets and Chetnik songs,<sup>3480</sup> “ethnic cleansing”,<sup>3481</sup> destruction of cultural and religious heritage,<sup>3482</sup> [REDACTED].<sup>3483</sup>

#### (a) The Unit, Pajzoš-trained Red Berets, and other Serb Forces forcibly displaced non-Serbs during the Bosanski Šamac takeover

820. In the months leading up to the takeover, Serb Forces had initiated persecutory measures against the non-Serb population. Between late 1991 and 1 April 1992, the JNA carried out more than 20 bombings in the municipality, mostly targeting socially-owned property such as the bridge across the Sava, which was blown up shortly before the referendum on BiH secession, as well as Muslim and Croat private property.<sup>3484</sup> By April 1992, Bosanski Šamac Serbs had begun spending weekends out of town and telling their non-Serb neighbours the town was going to be attacked by Serb Forces.<sup>3485</sup>

821. After arriving in Bosanski Šamac from Pajzoš on 11 April, Unit members made their presence known, harassing locals and assaulting women.<sup>3486</sup> On the night of 16/17 April 1992, in coordination with the JNA’s TG-17, Unit members and Pajžos-trained Red Berets commanded by Dragan ĐORĐEVIĆ aka CRNI<sub>(DB)</sub> attacked Bosanski Šamac.<sup>3487</sup> Together with the Bosanski Šamac TO and police, these Serb Forces seized control of

<sup>3477</sup> Indictment, para.22-26,46-48,50,64-66.

<sup>3478</sup> See AF1040.

<sup>3479</sup> See Indictment, para.22-25.

<sup>3480</sup> See e.g. [REDACTED].

<sup>3481</sup> See e.g. LUKAČDragan:[P02732](#), T.1792-1796,1799-1800,1814.

<sup>3482</sup> See e.g. [REDACTED]; AF1101-AF1103.

<sup>3483</sup> [REDACTED].

<sup>3484</sup> LUKAČDragan:[P02731](#), p.10-11; LUKAČDragan:[P02732](#), T.1584-1585. See also TIHIĆSulejman:[P01865](#), p.5.

<sup>3485</sup> [REDACTED]; TIHIĆSulejman:[P01865](#), p.5.

<sup>3486</sup> [REDACTED]; [REDACTED]. Cross-reference Section [II.F.4\(b\)\(ii\)a.iv](#).

<sup>3487</sup> Cross-reference Section [II.F.4\(b\)\(ii\)a.iv-v](#).

key facilities within Bosanski Šamac town and began disarming the remaining non-Serbs, initiating their persecutory campaign throughout the municipality.<sup>3488</sup>

822. As Serb Forces swept through Bosanski Šamac on 17 April 1992,<sup>3489</sup> Serbs were directed by radio to distinguish themselves and their houses with white ribbons.<sup>3490</sup> Undoubtedly aware of events already unfolding in Bijeljina and Zvornik, many non-Serb civilians immediately fled Bosanski Šamac out of fear.<sup>3491</sup> Simultaneously,<sup>3492</sup> Serb Forces, already controlling security structures in Bosanski Šamac,<sup>3493</sup> began arbitrarily<sup>3494</sup> arresting hundreds of remaining non-Serbs and detaining them in various makeshift locations, such as the TO and SUP buildings, school gymnasiums, and facilities in Zasavica and Crkvina.<sup>3495</sup>

(b) The Unit, Pajzoš-trained Red Berets, and other Serb Forces, forcibly displaced non-Serbs after the takeover

823. Following the takeover, Unit members exercised significant authority over Bosanski Šamac police and other municipal authorities.<sup>3496</sup> As detainees observed frequently during violent encounters, Dragan ĐORĐEVIĆ aka CRNI<sub>(DB)</sub> was superior to, and feared by, local police and JNA units.<sup>3497</sup>

824. Unit members and Pajzoš-trained Red Berets—recognisable by their nickname,<sup>3498</sup> and SMUP wolf insignia,<sup>3499</sup> as well as the Unit members' Serbian accents<sup>3500</sup>—distinguished themselves by their brutality.<sup>3501</sup>

<sup>3488</sup> Cross-reference Section [II.F.4\(b\)\(ii\)a.v.](#)

<sup>3489</sup> Cross-reference Section [II.F.4\(b\)\(ii\)a.v.](#)

<sup>3490</sup> [REDACTED].

<sup>3491</sup> [REDACTED]; [REDACTED]; [P01879](#).

<sup>3492</sup> LUKAČDragan:[P02731](#), p.21; [REDACTED]. See AF1106.

<sup>3493</sup> Cross-reference Section [II.F.4\(b\)\(ii\)a.v.](#)

<sup>3494</sup> [REDACTED]; [REDACTED]; [REDACTED]. See AF1085; AF1110-AF1111.

<sup>3495</sup> TIHIĆSulejman:[P01867](#), p.2-3; [REDACTED]; [REDACTED]; LUKAČDragan:[P02731](#), p.37; [P01953](#), p.2,7. See AF1107-AF1109; AF1112-AF1120.

<sup>3496</sup> [P01953](#), p.3,5-7; [P02048](#), p.1; [REDACTED]. For example, DEBELI<sub>(DB)</sub> issued orders to the Crisis Staff regarding which prisoners to exchange. [REDACTED].

<sup>3497</sup> [REDACTED]; [REDACTED]; TIHIĆSulejman:[P01865](#), p.8; [REDACTED]; [REDACTED]; LUKAČDragan:[P02732](#), T.1688,2064; [REDACTED].

<sup>3498</sup> E.g. [REDACTED], CRNI<sub>(DB)</sub>, DEBELI<sub>(DB)</sub>, LUGAR<sub>(DB)</sub>, LAKI<sub>(DB)</sub>, TRALJA<sub>(DB)</sub>, VUK<sub>(DB)</sub>, KORF<sub>(DB)</sub>, [REDACTED] and [REDACTED]. [P02048](#), p.1; [1D00861](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; LUKAČDragan:[P02731](#), p.25-26; LUKAČDragan:[P02732](#), T.1679-1681,1688,1714-1715; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3499</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00780](#). See AF1064; [REDACTED].

825. Perceived as “masters of life and death”,<sup>3502</sup> Unit members forced non-Serb detainees to bow their heads<sup>3503</sup> while undergoing brutal interrogations, torture, and beatings.<sup>3504</sup> Unit members forced non-Serb detainees to consume urine and excrement.<sup>3505</sup> Serb police officers pulled teeth with pliers,<sup>3506</sup> and [REDACTED].<sup>3507</sup> Unit members also forced non-Serb detainees to rape and sexually assault each other,<sup>3508</sup> [REDACTED].<sup>3509</sup> Striking a detainee’s genitals, a member of the Serb Forces declared: “Muslims should not propagate”.<sup>3510</sup>

826. At the Bosanski Šamac TO, SUP building, and secondary school, Unit members and other Serb Forces beat to death and otherwise executed non-Serb detainees.<sup>3511</sup> Slobodan MILJKOVIĆ aka LUGAR<sub>(DB)</sub> beat a 60-year-old Croat with a wooden table leg, ignoring cries for mercy, before shooting him in the back of the head and ordering detainees to “throw this dog into the Sava River”.<sup>3512</sup> Bosanski Šamac SJB Chief Stevan TODOROVIĆ carved letters into the head of a Croat whom he and two prison guards were beating [REDACTED].<sup>3513</sup> [REDACTED].<sup>3514</sup>

827. Unit members and other Serb Forces subjected the detained non-Serbs to inhumane, unhygienic, and demoralising conditions, forcing them to sing Chetnik songs and calling them ethnic slurs.<sup>3515</sup> Detainees [REDACTED] going for months without

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<sup>3500</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; LUKAČDragan:[P02732](#), T.1680-1681.  
<sup>3501</sup> [REDACTED]; [REDACTED]; [REDACTED]; LUKAČDragan:[P02732](#), T.1677-1678,2064-2065; [REDACTED]; [P01853](#)(00:30:41-00:32:29)(00:35:17-00:38:13), p.14,17-18; [REDACTED]. *See* AF1127; AF1131.  
<sup>3502</sup> [REDACTED]; [REDACTED].  
<sup>3503</sup> [REDACTED]; [REDACTED]; LUKAČDragan:[P02731](#), p.24.  
<sup>3504</sup> [REDACTED]; [REDACTED]; [REDACTED]; TIHIĆSulejman:[P01867](#), p.2-3; TIHIĆSulejman:[P01865](#), p.12; LUKAČDragan:[P02732](#), T.1687-1688; LUKAČDragan:[P02731](#), p.25-27,35; [REDACTED]; [REDACTED]; [REDACTED]; [P01706](#); [P01923](#), p.6-8. *See* AF1126-AF1131.  
<sup>3505</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *See also* [REDACTED].  
<sup>3506</sup> [REDACTED]; [REDACTED]; [REDACTED]; LUKAČDragan:[P02732](#), T.1764-1765; [REDACTED]. *See also* [P02761](#), p.3.  
<sup>3507</sup> [REDACTED]; [REDACTED].  
<sup>3508</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P01923](#), p.6-8.  
<sup>3509</sup> [REDACTED].  
<sup>3510</sup> *See* AF1127-AF1129.  
<sup>3511</sup> [REDACTED]; [REDACTED]; TIHIĆSulejman:[P01867](#), p.2-3. *See* AF1138-AF1139. *See also* [P01953](#), p.2.  
<sup>3512</sup> LUKAČDragan:[P02731](#), p.27-28; LUKAČDragan:[P02732](#), T.1687,1697-1698. *See* AF1137.  
<sup>3513</sup> LUKAČDragan:[P02731](#), p.38-39,42; [REDACTED]; [REDACTED]; [REDACTED]; [P01923](#), p.6,8.  
<sup>3514</sup> [REDACTED]; [P01923](#), p.6,8. *See* [REDACTED].  
<sup>3515</sup> [REDACTED]; [REDACTED]; [REDACTED]; TIHIĆSulejman:[P01867](#), p.2-3; LUKAČDragan:[P02732](#), T.1686-1688; LUKAČDragan:[P02731](#), p.25-27,31-32,35; [P01706](#). *See* AF1129; AF1136. *See also* AF1123.

bathing,<sup>3516</sup> and receiving inadequate food and water resulting in extreme weight loss.<sup>3517</sup> During winter, conditions were so bad that non-Serb detainees “begged” for forced labour assignments on Serb farms, so they would have food.<sup>3518</sup> Detainees were also forced to perform dangerous tasks, such as digging trenches on the frontlines<sup>3519</sup> and illegal tasks, such as working on stolen cars before Unit members exported them to Serbia.<sup>3520</sup>

828. Throughout the period following the takeover, the Serb municipal leadership was aware of the abuse taking place in the detention centres.<sup>3521</sup> By 15 May 1992, CRNI<sub>(DB)</sub> and TODOROVIĆ—who was simultaneously committing egregious crimes inside detention facilities<sup>3522</sup>—shared responsibility for implementing the official Crisis Staff order requiring “isolation” of Bosnian Croats in accordance with the Variant A/B Instructions.<sup>3523</sup>

829. Unit members coordinated with the JNA, and later the VRS, in a campaign to remove non-Serbs from the Posavina Corridor by transferring detainees between detention facilities in different municipalities and even into Serbia by JNA buses and helicopters. Political prisoners were transferred to JNA barracks in Serbia aboard a JNA helicopter also ferrying the body of recently-deceased Unit member Aleksandar VUKOVIĆ aka VUK<sub>(DB)</sub>.<sup>3524</sup> Over the course of a month, some prisoners were transferred from the Bosanski Šamac TO to the JNA Barracks in Brčko, Bijeljina, Batajnica (Serbia), and Zemun (Serbia), before returning to Bosanski Šamac.<sup>3525</sup> [REDACTED]<sup>3526</sup> [REDACTED],<sup>3527</sup> [REDACTED].<sup>3528</sup>

<sup>3516</sup> [REDACTED]; LUKAČDragan:[P02732](#), T.1806.

<sup>3517</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P01853](#)(00:29:30-00:30:40)(00:33:59-00:35:17), p.13,15-16.

<sup>3518</sup> ĐUKIĆPetar:T.42-43(17-Dec-2019).

<sup>3519</sup> [REDACTED]; TIHIĆSulejman:[P01867](#), p.3; [P01923](#), p.6-8. See AF1140-AF1141.

<sup>3520</sup> LUKAČDragan:[P02731](#), p.39; LUKAČDragan:[P02732](#), T.1771-1772. See AF1142-AF1143; [REDACTED].

<sup>3521</sup> TIHIĆSulejman:[P01865](#), p.11-13; TIHIĆSulejman:[P01866](#), p.5; TIHIĆSulejman:[P01867](#), p.3; TIHIĆSulejman:[P01911](#), p.27; [REDACTED].

<sup>3522</sup> See e.g. [P01923](#), p.6-8; [REDACTED]; ĐUKIĆPetar:T.20(22-Jan-2020).

<sup>3523</sup> [P01594](#); DONIARRobert:T.49-50(30-Jan-2018); ĐUKIĆPetar:T.21-22(22-Jan-2020); [REDACTED]; [P01953](#), p.2.

<sup>3524</sup> LUKAČDragan:[P02732](#), T.1712-1716; [REDACTED]; [REDACTED]. See also [P02038](#).

<sup>3525</sup> LUKAČDragan:[P02731](#), p.28-35; LUKAČDragan:[P02732](#), T.1699,1706-1710,1716,1721,1734-1735; [REDACTED]; [REDACTED]; [P01853](#)(00:29:30-00:30:40)(00:32:30-00:32:43), p.13,15.

<sup>3526</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3527</sup> [REDACTED]; [P01853](#)(00:35:17-00:38:13), p.17-18.

<sup>3528</sup> [REDACTED].



830. Serb Forces pursuing “ethnic cleansing” utilised exchanges to forcibly displace non-Serb civilians to Croatia and parts of BiH while creating brutal conditions for those who remained, such that even those who were not detained or exchanged sought to leave.<sup>3529</sup> By 24 April 1992, the Municipal Crisis Staff had codified local communities’ appropriation of non-Serb property following the takeover.<sup>3530</sup> Unit members and Pajzoš-trained Red Berets under CRNI<sub>(DB)</sub> “engaged in unheard-of looting of private and socially-owned property” in Bosanski Šamac, which they systematically transferred to Serbia.<sup>3531</sup> Some non-Serbs who remained were raped,<sup>3532</sup> and many were subjected to oppressive and dangerous forced labour requirements.<sup>3533</sup> TODOROVIĆ prohibited non-Serbs from meeting in groups,<sup>3534</sup> non-Serb political parties were disbanded,<sup>3535</sup> and Serb municipal authorities assigned villages and streets Serb names.<sup>3536</sup> While Serb Forces controlled Bosanski Šamac, Muslim work brigades were forced to clean the remains of a mosque and Catholic Church destroyed by a large quantity of explosives.<sup>3537</sup>

(c) Crkvina massacre<sup>3538</sup>

831. On 7 May 1992, LUGAR<sub>(DB)</sub> along with other Unit members, including Predrag LAZAREVIĆ aka LAKI<sub>(DB)</sub>, [REDACTED], and [REDACTED], massacred at least 16 non-Serb civilians from the Bosanski Šamac municipality at the Crkvina detention facility.<sup>3539</sup> [REDACTED].<sup>3540</sup> Once they arrived, LUGAR<sub>(DB)</sub>, the Unit members and Bosanski Šamac police went on a violent rampage, beating, shooting, and killing detainees at random.<sup>3541</sup> After killing several people in quick succession, survivors were ordered to line up against a wall while LUGAR<sub>(DB)</sub> and others walked down the line, shooting detainees in the head.<sup>3542</sup> 30 minutes later, Bosanski Šamac police forced the

<sup>3529</sup> [REDACTED]; LUKAČDragan:[P02731](#), p.39-40; LUKAČDragan:[P02732](#), T.1792-1796,1799-1800,1814; [P01859](#); [P02752](#); [P02751](#); [P01853](#); [REDACTED]; [REDACTED]. See AF1144.

<sup>3530</sup> [P03115](#).

<sup>3531</sup> [REDACTED]; [P01953](#), p.2-3; [REDACTED]. See AF1097-AF1098.

<sup>3532</sup> TIHIĆSulejman:[P01867](#), p.3.

<sup>3533</sup> [P01923](#), p.6-8; [REDACTED]. See AF1140-AF1141.

<sup>3534</sup> [P01912](#); [REDACTED]. See AF1105.

<sup>3535</sup> See AF1104.

<sup>3536</sup> [ID00857](#), p.2-3. See AF1101-AF1103. See also LUKAČDragan:[P02731](#), p.40.

<sup>3537</sup> [REDACTED]; [REDACTED]. See also [P01856](#); [P01857](#); [P01860](#); [P01861](#); [P01862](#).

<sup>3538</sup> Indictment, para.50. See AnnexC.

<sup>3539</sup> Indictment, para.50; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See AF1082.

<sup>3540</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3541</sup> [REDACTED]; [REDACTED]; [P03142](#), p.1; [REDACTED].

<sup>3542</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P01953](#), p.2; [REDACTED].

surviving prisoners to load the bodies aboard a departing truck<sup>3543</sup> [REDACTED].<sup>3544</sup>  
 The remains of those executed were buried on the right bank of the river Bosna.<sup>3545</sup>  
 Despite reports of the Crkvina massacre to the Bosanski Šamac Crisis Staff and in the  
 Yugoslav and international media, no Unit members were held accountable.<sup>3546</sup>

(d) Deportation and forcible transfer<sup>3547</sup>

832. Through the attacks, murders, and other crimes outlined above, Serb Forces  
 expelled Bosnian Muslims and Croats from Bosanski Šamac.<sup>3548</sup> In 1991, Bosanski  
 Šamac was an “ethnically diverse community,” composed of nearly 60% non-Serbs.<sup>3549</sup>  
 By 1997, the Serb population had ballooned to 78.3%, and the population of Muslims and  
 Croats had dropped from 6.8% and 44.7%, to 1.9% and 15.0%, respectively.<sup>3550</sup>

(e) The Bosanski Šamac crimes are attributable to the Accused and other JCE members

833. The Serb Forces’ crimes of murder, persecution, forcible transfer, and deportation  
 are attributable to the Accused and other JCE members. Unit members and Pajžos-trained  
 Red Berets were under the command of CRNI<sub>(DB)</sub> and were tools of the Accused. RS-  
 MUP police units, including police chief TODORVIĆ, were the tools of M.STANIŠIĆ.  
 JNA members were tools of ADŽIĆ and MILOŠEVIĆ. From 12 May 1992, the VRS  
 units were tools of MLADIĆ. The Bosanski Šamac TO and Crisis Staff that instituted  
 discriminatory policies to drive non-Serbs out were the instrumentalities of JCE members  
 in the Bosnian Serb leadership, including KARADŽIĆ, PLAVŠIĆ, and KRAJIŠNIK.  
 Others who acted in concert with the Serb Forces above, including other paramilitaries, in  
 the commission of the crimes, which are thus attributable to the Accused and other JCE  
 members.

<sup>3543</sup> [REDACTED]; [REDACTED].

<sup>3544</sup> [REDACTED].

<sup>3545</sup> [P02065](#), p.1; [REDACTED]; [REDACTED]. See AnnexC.

<sup>3546</sup> [REDACTED]; [REDACTED]. See AF1082.

<sup>3547</sup> Indictment, para.64-66.

<sup>3548</sup> Indictment, para.64-65.

<sup>3549</sup> TABEAUWwa:[P02069](#), p.21. See AF1042.

<sup>3550</sup> TABEAUWwa:[P02069](#), p.21,23,28.

#### 4. Doboj Crimes<sup>3551</sup>

834. On 3 May 1992, the Accused deployed the Unit and Ozren-trained Serbs under veteran Unit member Radojica BOŽOVIĆ<sub>(DB)</sub> to take over Doboj,<sup>3552</sup> situated at a crucial strategic junction along the Posavina Corridor.<sup>3553</sup> Together with the JNA, VRS, RSK-MUP, Doboj police and regional TO, BOŽOVIĆ's forces persecuted, murdered, and expelled non-Serbs throughout the municipality. These Serb Forces committed their crimes with persecutory intent,<sup>3554</sup> as demonstrated by their targeting of non-Serb villages and religious buildings,<sup>3555</sup> use of racial epithets and Chetnik songs,<sup>3556</sup> and brutal beating of a detainee [REDACTED].<sup>3557</sup>

##### (a) The Unit, Ozren-trained Red Berets, and other Serb Forces forcibly displaced non-Serbs during the Doboj takeover

835. Tensions in Doboj were building throughout March and April 1992. Serb Forces erected JNA checkpoints and other barricades throughout the municipality to cut off non-Serb villages and humiliate, abuse, and rob non-Serbs.<sup>3558</sup> The SDS used discriminatory measures to expel the non-Serbs, as non-Serbs were dismissed from their jobs,<sup>3559</sup> and, by early May, all non-Serbs were removed from the police force.<sup>3560</sup> Croats and Muslims fled Doboj because their businesses and cars were blown-up by SDS activists and they had lost their jobs, leaving them without financial means.<sup>3561</sup> SDS policy restricted the movement of non-Serbs who remained in Doboj and soldiers enforced a curfew.<sup>3562</sup> The

<sup>3551</sup> Indictment, para.22-26,51-52,54,64-66.

<sup>3552</sup> See AF1152.

<sup>3553</sup> See AF873; AF1147; HADŽOVIĆEdin:[P02011](#), T.2220-2221,2231-2232; HADŽOVIĆEdin:[P02009](#), p.3; [P02014](#).

<sup>3554</sup> See Indictment, para.22-25.

<sup>3555</sup> See e.g. HADŽOVIĆEdin:[P02024](#), p.6-8; HADŽOVIĆEdin:T.31(28-Mar-2018);

<sup>3556</sup> HADŽOVIĆEdin:[P02024](#), p.7; AHMETOVIĆHusein:[P01711](#), para.26-27.

<sup>3557</sup> See e.g. [REDACTED].

<sup>3558</sup> HADŽOVIĆEdin:[P02024](#), p.6; HADŽOVIĆEdin:[P02008](#), p.3(A uniformed Serb soldier stopped HADŽOVIĆ's car at a checkpoint saying "[...] where do you want to go, balija? There is [no] room for Muslims in Serbia"); HADŽOVIĆEdin:[P02010](#); HADŽOVIĆEdin:[P02009](#), p.2; HADŽOVIĆEdin:T.29(28-Mar-2018); [REDACTED]; [REDACTED]. See AF1149.

<sup>3559</sup> HADŽOVIĆEdin:[P02011](#), T.2231-2232; HADŽOVIĆEdin:[P02024](#), p.5; HADŽOVIĆEdin:[P02008](#), p.3; HADŽOVIĆEdin:T.6,30(28-Mar-2018). See [P02014](#).

<sup>3560</sup> HADŽOVIĆEdin:[P02008](#), p.4. See AF1155.

<sup>3561</sup> HADŽOVIĆEdin:[P02009](#), p.2-3; HADŽOVIĆEdin:T.6-7,30(28-Mar-2018); HADŽOVIĆEdin:[P02011](#), T.2232. See also [P03173](#); [P02014](#).

<sup>3562</sup> HADŽOVIĆEdin:[P02008](#), p.3. See AF1156; AF1166.

JNA and Serb authorities systematically disarmed non-Serbs while ensuring Serbs were armed.<sup>3563</sup> [REDACTED].<sup>3564</sup>

836. On 3 May 1992—the first day of the Muslim holiday of Bajram<sup>3565</sup>—at 07:00, Serb soldiers established a checkpoint at the regional hospital, refusing entry to non-Serb employees and disconnecting telephone lines shortly thereafter.<sup>3566</sup> [REDACTED],<sup>3567</sup> on **SIMATOVIĆ**'s behalf, **BOŽOVIĆ**<sub>(DB)</sub> ordered the veteran Unit members and Ozren-trained Red Berets under his command<sup>3568</sup> to take over Doboj by force, in coordination with the JNA, Doboj regional TO, Doboj Serb police, and Serb paramilitary forces.<sup>3569</sup> Doboj's Serb police officials immediately arrested Muslim police officers.<sup>3570</sup> [REDACTED],<sup>3571</sup> [REDACTED].<sup>3572</sup> [REDACTED].<sup>3573</sup> Doboj town [REDACTED] on 7 May it was “completely cleansed” of non-Serbs.<sup>3574</sup> As one Ozren-trained Red Beret stated: “They were simply moved out of their houses”.<sup>3575</sup> **BOŽOVIĆ**<sub>(DB)</sub> and TO commander Milovan **STANKOVIĆ** had control of the Doboj operation.<sup>3576</sup>

(b) The Unit, Ozren-trained Red Berets, and other Serb Forces forcibly displaced non-Serbs after the takeover<sup>3577</sup>

837. In the period following the takeover and ensuing efforts to establish the Posavina Corridor, Serb Forces applied various strategies to expel non-Serbs from Doboj, targeting the non-Serb civilian population with crimes, busing non-Serb civilians out *en masse*,<sup>3578</sup>

<sup>3563</sup> Cross-reference Section [II.F.4\(b\)\(ii\)c.i-ii.](#)

<sup>3564</sup> [REDACTED].

<sup>3565</sup> [REDACTED]. See AF1152; [REDACTED].

<sup>3566</sup> HADŽOVIĆEdin:[P02008](#), p.3.

<sup>3567</sup> [REDACTED].

<sup>3568</sup> [REDACTED]; [REDACTED]; RFJ-165:T.18-19(29-May-2018); [P00500](#), p.16; [REDACTED]. See [P02374](#), p.3-4.

<sup>3569</sup> HADŽOVIĆEdin:[P02024](#), p.6-7; HADŽOVIĆEdin:[P02009](#), p.4; [P03504](#), p.6; RFJ-165:T.19-20(29-May-2018); [REDACTED]; [REDACTED]; [P01713](#), p.1; [P03163/P03578](#)(duplicates)(demonstrates that Milovan STANKOVIĆ was the TO Staff Commander for the Doboj region). See AF1152; AF911. See also [P02374](#), p.4.

<sup>3570</sup> RFJ-165:T.19-20(29-May-2018); [REDACTED]. See AF1155.

<sup>3571</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3572</sup> [REDACTED].

<sup>3573</sup> [REDACTED].

<sup>3574</sup> [REDACTED]; RFJ-165:T.20-21(29-May-2018).

<sup>3575</sup> RFJ-165:T.20-21(29-May-2018).

<sup>3576</sup> HADŽOVIĆEdin:[P02024](#), p.6; HADŽOVIĆEdin:[P02009](#), p.3; HADŽOVIĆEdin:[P02011](#), T.2269; [REDACTED]; [REDACTED]. Cross-reference Section [II.F.4\(b\)\(ii\)c.i.](#)

<sup>3577</sup> Indictment, para.52.

<sup>3578</sup> [REDACTED]; [REDACTED].

and exchanging non-Serb detainees.<sup>3579</sup> Thousands of Muslims fled Doboj town for Tešanj, a Muslim-majority town south of Doboj, due to harsh conditions imposed by the Serbs in the months after the takeover.<sup>3580</sup> BOŽOVIĆ<sub>(DB)</sub> and Serb Forces under his command, cooperating with the RS-MUP,<sup>3581</sup> looted the homes and stole the vehicles of many non-Serbs.<sup>3582</sup> Many Muslim and Croat homes were destroyed.<sup>3583</sup> During May and June 1992, Serb Forces [REDACTED] damaged or destroyed at least 21 Muslim and Catholic cultural and religious buildings and monuments with explosives.<sup>3584</sup>

838. On 10 May 1992, [REDACTED] a group of “Serbs from the area of Ozren” [REDACTED] shelled and invaded the Muslim village of Gornja Grapska, killing at least 34 civilians and destroying mosques.<sup>3585</sup> Under BOŽOVIĆ<sub>(DB)</sub> command, Ozren-trained Red Berets then rounded up the remaining Muslims in Grapska and nearby villages, then detained and tortured them at the Doboj police station, which BOŽOVIĆ<sub>(DB)</sub> controlled.<sup>3586</sup>

839. By June 1992, Ozren-trained Red Berets, under BOŽOVIĆ<sub>(DB)</sub> subordinate Unit commanders, Fnu VUKMIROVIĆ aka VUK<sub>(DB)</sub>, and RIKI<sub>(DB)</sub>, conducted operations in the surrounding non-Serb villages, together with other Serb Forces including Doboj police, VRS, RS-MUP, and RSK-MUP.<sup>3587</sup> During these operations, one group of Ozren-trained Red Berets secured the frontline while Unit members from Serbia and Montenegro were tasked with killing the inhabitants of the seized villages.<sup>3588</sup> The group executed captured enemy combatants and all civilians in Johovac, including children and four people with disabilities.<sup>3589</sup> [REDACTED].<sup>3590</sup>

<sup>3579</sup> [REDACTED]; AHMETOVIĆ Husein: [P01711](#), para.40-41; HADŽOVIĆ Edin: [P02011](#), T.2232,2263-2264; LUKAČ Dragan: [P02731](#), p.40; LUKAČ Dragan: [P02732](#), T.1800; [P02020](#); [P01853](#), p.23-24; [P02021](#).

<sup>3580</sup> See AF1154; AF1156; AF1158. HADŽOVIĆ corroborates this, indicating up to 70% of the non-Serbs in Čaršija fled on 3 May 1992, mainly towards Tešanj. See HADŽOVIĆ Edin: [P02009](#), p.3; HADŽOVIĆ Edin: [P02008](#), p.4.

<sup>3581</sup> [REDACTED]; [P02378](#).

<sup>3582</sup> HADŽOVIĆ Edin: [P02008](#), p.2,4-6; HADŽOVIĆ Edin: T.6-7(28-Mar-2018); HADŽOVIĆ Edin: [P02009](#), p.3; HADŽOVIĆ Edin: [P02011](#), T.2232,2263-2264; HADŽOVIĆ Edin: [P02022](#), p.1; [P01853](#)(00:54:09-00:58:35), p.23; [P02021](#), p.1; [P01713](#), p.1; [P02023](#); [P02376](#); [P03491](#), p.10; [REDACTED].

<sup>3583</sup> [P01713](#), p.1; [REDACTED]; [REDACTED].

<sup>3584</sup> HADŽOVIĆ Edin: [P02009](#), p.3; HADŽOVIĆ Edin: T.31(28-Mar-2018); HADŽOVIĆ Edin: [P02008](#), p.4,9; HADŽOVIĆ Edin: [P02024](#), p.6; [REDACTED]; [REDACTED]. See AF1167; AF1160; [P01713](#), p.1.

<sup>3585</sup> [REDACTED]. See HADŽOVIĆ Edin: [P02008](#), p.9; AF1160; AF1167. See also [P02377](#).

<sup>3586</sup> RFJ-165:T.21-24(29-May-2018); [REDACTED].

<sup>3587</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00500](#), p.16; [P02375](#), p.2; [P03699](#). Cross-reference Section [II.F.4\(b\)\(ii\)d](#).

<sup>3588</sup> [REDACTED]; RFJ-165:T.13,26-28(29-May-2018).

<sup>3589</sup> RFJ-165:T.26-28(29-May-2018); [REDACTED].

840. In mid-1992, BOŽOVIĆ<sub>(DB)</sub> ordered the Ozren-trained Red Berets to expel the inhabitants of the Muslim village of Bukovačke Čivčije.<sup>3591</sup> They loaded seven buses with civilians from the village to take to the RS border.<sup>3592</sup> [REDACTED].<sup>3593</sup> [REDACTED].<sup>3594</sup>

841. [REDACTED].<sup>3595</sup> BOŽOVIĆ<sub>(DB)</sub> was present at a mass grave site while it was being filled in.<sup>3596</sup> Muslim detainees were forced to dump 30-50 bodies into excavated holes and bury them [REDACTED].<sup>3597</sup>

842. Beginning already in May 1992, the Unit, Ozren-trained Red Berets and associated Serb Forces arrested and detained hundreds of Muslims and Croats in 33 detention centres, under cramped and inhumane conditions.<sup>3598</sup> At the detention centres, BOŽOVIĆ<sub>(DB)</sub>, the Red Berets, and other Serb Forces murdered non-Serb detainees and inflicted various forms of torture, harassment, and inhumane treatment on others, including the following illustrative examples.

843. On 2 June 1992, Serb Forces gathered the inhabitants of the non-Serb village of Dragalovci, ordered them to surrender their weapons,<sup>3599</sup> separated the males at gunpoint, and arbitrarily took 20-28 of these men to Spreča prison, which is discussed below.<sup>3600</sup> During the same month, in Čaršija, a Muslim neighbourhood,<sup>3601</sup> men wearing camouflage uniforms and red berets with the Serb 4-S insignia broke into Muslim homes, forced their inhabitants onto the asphalt outside, beat them with bats, and stuffed them into the luggage compartment of a bus on the way to the Usora camp.<sup>3602</sup>

<sup>3590</sup> [REDACTED]. See also [REDACTED].

<sup>3591</sup> [REDACTED]; [REDACTED]; RFJ-165:T.24(29-May-2018); [REDACTED]. See also [REDACTED].

<sup>3592</sup> [REDACTED]; RFJ-165:T.24(29-May-2018).

<sup>3593</sup> [REDACTED]; [REDACTED].

<sup>3594</sup> [REDACTED]. The Osinjska Brigade was subordinated to the VRS TG-3. [P03699](#), p.2. See also [P00168](#), p.3; WILSONJohn:T:69-70(27-Jun-2017); [REDACTED].

<sup>3595</sup> [REDACTED].

<sup>3596</sup> RFJ-165:T.25-26(29-May-2018); [REDACTED].

<sup>3597</sup> [REDACTED]; RFJ-165:T.25(29-May-2018).

<sup>3598</sup> [REDACTED]; [REDACTED]; HADŽOVIĆEdin:[P02024](#), p.8; HADŽOVIĆEdin:T.13(28-Mar-2018); HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:[P02011](#), T.2283; RFJ-165:T.20,26(29-May-2018); [P03117](#). See AF1165; AF1153.

<sup>3599</sup> [REDACTED]; [REDACTED]. See AF1161-AF1162.

<sup>3600</sup> [REDACTED]; [REDACTED]. See AF1162.

<sup>3601</sup> HADŽOVIĆEdin:T.30-31(28-Mar-2018).

<sup>3602</sup> HADŽOVIĆEdin:[P02022](#), p.1; HADŽOVIĆEdin:T.10-11(28-Mar-2018); HADŽOVIĆEdin:[P02024](#), p.7; HADŽOVIĆEdin:[P02008](#), p.6; HADŽOVIĆEdin:[P02009](#), p.4.



844. The Usora camp, comprising “hastily organised” makeshift detention units near the Bosanka Factory in Usora (aka “Bosanka Camp”), housed hundreds of non-Serb prisoners following the takeover of Doboj.<sup>3603</sup> Detainees were deprived of food for extended periods and, having limited access to water, resorted to catching rainwater to drink.<sup>3604</sup> Overcrowded, unhygienic rooms held more than 200 people at a time, without even a toilet.<sup>3605</sup>

845. At the Usora camp, security was provided by VRS units and Doboj police<sup>3606</sup> and Slobodan KARAGIĆ aka KARAGA<sub>(DB)</sub> extorted and ransomed prisoners for money.<sup>3607</sup> [REDACTED].<sup>3608</sup> Red Berets with Serbian accents and other paramilitary forces beat prisoners with baseball bats, wooden planks, rifle butts, and other objects.<sup>3609</sup> At gunpoint, detainees were forced to stand overnight with their arms in the air showing three fingers and sing songs praising Serbia and insulting Alija IZETBEGOVIĆ.<sup>3610</sup> In June 1992, Unit members, including VUK<sub>(DB)</sub> and RIKI<sub>(DB)</sub>, removed Muslim detainees from the Usora camp and killed them at the Mt. Ozren camp.<sup>3611</sup> [REDACTED].<sup>3612</sup>

846. [REDACTED].<sup>3613</sup> At Spreča, the prisoners received minimal food and a bucket for a toilet.<sup>3614</sup> [REDACTED].<sup>3615</sup> The Unit, Ozren-trained Red Berets, and Serb Forces including other Ozren-trained Serb paramilitaries and police, severely beat detainees.<sup>3616</sup> BOŽOVIĆ<sub>(DB)</sub> himself participated in the mistreatment, forcing prisoners to sing Chetnik

<sup>3603</sup> [P02015](#), p.1,3-4,19-50; [P01210](#); RFJ-165:T.20(29-May-2018); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3604</sup> [REDACTED]; HADŽOVIĆEdin:[P02008](#), p.7; AHMETOVIĆHusein:[P01711](#), para.7; HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:[P02022](#), p.1; HADŽOVIĆEdin:[P02024](#), p.8. See [REDACTED]; [REDACTED]; [P01853](#)(00:54:09-00:58:35), p.24; [P02021](#), p.2; HADŽOVIĆEdin:[P02011](#), T.2263-2264.

<sup>3605</sup> HADŽOVIĆEdin:[P02008](#), p.6-7; HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:[P02022](#), p.1; AHMETOVIĆHusein:[P01711](#), para.7; HADŽOVIĆEdin:[P02024](#), p.8; [REDACTED].

<sup>3606</sup> HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:T.37(28-Mar-2018); HADŽOVIĆEdin:[P02008](#), p.6; [REDACTED]; [P02388](#), p.1; [REDACTED]. But see also HADŽOVIĆEdin:[P02024](#), p.8.

<sup>3607</sup> [REDACTED]; HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:[P02022](#), p.2; HADŽOVIĆEdin:T.11-12(28-Mar-2018); HADŽOVIĆEdin:[P02024](#), p.8; [REDACTED].

<sup>3608</sup> [REDACTED].

<sup>3609</sup> AHMETOVIĆHusein:[P01711](#), para.7-8; RFJ-165:T.24-25(29-May-2018); [P01853](#)(00:54:09-00:58:35), p.24; [P02021](#), p.2; HADŽOVIĆEdin:[P02011](#), T.2263-2264; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3610</sup> HADŽOVIĆEdin:[P02008](#), p.6; HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:[P02024](#), p.7-8.

<sup>3611</sup> [REDACTED]; RFJ-165:T.24-25(29-May-2018); [REDACTED]; [REDACTED].

<sup>3612</sup> [REDACTED].

<sup>3613</sup> [REDACTED].

<sup>3614</sup> HADŽOVIĆEdin:[P02008](#), p.5; AHMETOVIĆHusein:[P01711](#), para.9.

<sup>3615</sup> [REDACTED]. See AF1163.

<sup>3616</sup> [REDACTED]; AHMETOVIĆHusein:[P01711](#), para.9,20-21; [REDACTED]. See RFJ-165:T.23-24(29-May-2018).



songs, standing with three fingers raised, and threatening to slit their throats.<sup>3617</sup> The Serb Forces also frequently beat prisoners with baseball bats and in October 1992, eight Red Berets from Serbia beat an elderly paralysed detainee to death with one.<sup>3618</sup>

847. Most prisoners were taken out during the night and never seen or heard from again.<sup>3619</sup> For example, on the evening of 24 May 1992, RIKI<sub>(DB)</sub>, KARAGA<sub>(DB)</sub>, and Nikola JORGIĆ, a local Serb under KARAGA<sub>(DB)</sub>'s command,<sup>3620</sup> [REDACTED].<sup>3621</sup> [REDACTED].<sup>3622</sup>

848. Spreča detainees performed forced labour, including looting, as well as removing and incinerating corpses from the Doboј area, on VRS orders.<sup>3623</sup> Prison guards shot and beat prisoners who attempted to escape forced labour.<sup>3624</sup> Upon release, some detainees were still required to report for forced labour obligations.<sup>3625</sup>

849. Perčin's Disco, located across from the Vila SerbianDB camp, was guarded by Ozren-trained Red Berets, among others, who trained there and, beginning in May 1992, was used to detain more than 300 prisoners at once.<sup>3626</sup> Detention conditions were "unbearable" and at times prisoners were not fed [REDACTED].<sup>3627</sup> Guards beat prisoners every day, using chains and batons, in addition to forcing prisoners to beat each other, [REDACTED].<sup>3628</sup> KARAGA's<sub>(DB)</sub> unit boasted of raping detainees.<sup>3629</sup> Guards targeted elderly detainees.<sup>3630</sup> Members of the Doboј's Serb police also questioned and beat the detainees with a shovel at times.<sup>3631</sup> In one instance, in June 1992, Ozren-trained

<sup>3617</sup> AHMETOVIĆHusein:[P01711](#), para.9,19-21,26-28. See HADŽOVIĆEdin:[P02008](#), p.5.

<sup>3618</sup> AHMETOVIĆHusein:[P01711](#), para.8-9,21. See also AF1164; AF1166.

<sup>3619</sup> [REDACTED]. See HADŽOVIĆEdin:[P02008](#), p.5.

<sup>3620</sup> [REDACTED].

<sup>3621</sup> [REDACTED].

<sup>3622</sup> [REDACTED].

<sup>3623</sup> AHMETOVIĆHusein:[P01711](#), para.22-25,36; [REDACTED].

<sup>3624</sup> AHMETOVIĆHusein:[P01711](#), para.36(After being shot and beaten during his previous attempts, witness AHMETOVIĆ successfully escaped prison on his third attempt by swimming the river Bosna to BiH.).

<sup>3625</sup> AHMETOVIĆHusein:[P01711](#), para.29; [REDACTED]; [REDACTED].

<sup>3626</sup> [P02015](#), p.1-2,13-14,16; [P01205](#); HADŽOVIĆEdin:[P02011](#), T.2233-2235,2297; HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:[P02024](#), p.8; HADŽOVIĆEdin:T.13(28-Mar-2018); RFJ-165:T.26(29-May-2018); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3627</sup> HADŽOVIĆEdin:[P02009](#), p.4-5; HADŽOVIĆEdin:[P02008](#), p.7; [REDACTED]; [REDACTED].

<sup>3628</sup> HADŽOVIĆEdin:[P02008](#), p.7-8; HADŽOVIĆEdin:[P02009](#), p.5; HADŽOVIĆEdin:[P02022](#), p.2; HADŽOVIĆEdin:[P02024](#), p.9; [REDACTED]; [REDACTED]. See also RFJ-165:T.26(29-May-2018); [REDACTED].

<sup>3629</sup> RFJ-165:T.26(29-May-2018); [REDACTED].

<sup>3630</sup> HADŽOVIĆEdin:[P02022](#), p.2.

<sup>3631</sup> HADŽOVIĆEdin:[P02022](#), p.2; HADŽOVIĆEdin:[P02024](#), p.9; HADŽOVIĆEdin:[P02009](#), p.5.

Red Berets brought a prisoner to Perčin's Disco whom they had beat so severely he died of his injuries days later, after they failed to provide him medical care.<sup>3632</sup> The Red Berets left his dead body in the room for several days.<sup>3633</sup>

850. Some detainees from Perčin's Disco were taken to Muslim villages to bury dead villagers, dig graves for dead cattle and make coffins for deceased Serb soldiers.<sup>3634</sup> [REDACTED].<sup>3635</sup>

851. Most detainee exchanges resulting in the removal of non-Serbs from Doboj occurred between 1993 and 1995.<sup>3636</sup> [REDACTED].<sup>3637</sup> [REDACTED].<sup>3638</sup> The remaining Muslim population was expelled by force during 10 days in 1995.<sup>3639</sup> [REDACTED].<sup>3640</sup> [REDACTED].<sup>3641</sup>

(c) Murder of Perčin's Disco detainees used as human shields<sup>3642</sup>

852. On 12 July 1992, Red Berets and other forces killed approximately 27 non-Serb civilians<sup>3643</sup> who had been detained in Perčin's Disco.<sup>3644</sup> Unit members<sup>3645</sup> burst in, shouting and cursing, and chased approximately 50 detainees outside,<sup>3646</sup> in an action approved by Doboj CSB Chief Andrija BJELOŠEVIĆ.<sup>3647</sup> They ordered the detainees to remove their shirts, form several rows, and march towards the frontline, forming a human

<sup>3632</sup> [REDACTED]; [REDACTED]; HADŽOVIĆEdin:[P02008](#), p.7; HADŽOVIĆEdin:[P02009](#), p.4-5; HADŽOVIĆEdin:[P02011](#), T.2297-2299; HADŽOVIĆEdin:[P02022](#), p.2; HADŽOVIĆEdin:[P02024](#), p.8-9; HADŽOVIĆEdin:T.13(28-Mar-2018). See AF1164; AF1166; [REDACTED]; RFJ-165:T.26(29-May-2018).

<sup>3633</sup> [REDACTED]; HADŽOVIĆEdin:[P02008](#), p.7; HADŽOVIĆEdin:[P02009](#), p.4-5.

<sup>3634</sup> HADŽOVIĆEdin:[P02022](#), p.2; HADŽOVIĆEdin:[P02008](#), p.8; HADŽOVIĆEdin:[P02009](#), p.4; HADŽOVIĆEdin:[P02011](#), T.2300-2301; HADŽOVIĆEdin:[P02024](#), p.8-9; [REDACTED]. But see HADŽOVIĆEdin:T.12(28-Mar-2018).

<sup>3635</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3636</sup> [REDACTED].

<sup>3637</sup> [REDACTED]; [REDACTED].

<sup>3638</sup> [REDACTED]. See [P00168](#), p.3; WILSONJohn:T.69-70(27-Jun-2017).

<sup>3639</sup> [REDACTED]. See [REDACTED].

<sup>3640</sup> [REDACTED]; [REDACTED]; AHMETOVIĆHuscin:[P01711](#), para.37.

<sup>3641</sup> [REDACTED].

<sup>3642</sup> Indictment, para.54. See AnnexC.

<sup>3643</sup> The Prosecution charged approximately 27 murders and identified 21 named victims. See TABEAUewa:[P02068](#), p.61,70-75.

<sup>3644</sup> See [P02015](#), p.1-2,13-14,16; [P01205](#); HADŽOVIĆEdin:[P02011](#), T.2233-2234; [REDACTED]; [REDACTED].

<sup>3645</sup> [REDACTED]; [REDACTED]; [REDACTED]; HADŽOVIĆEdin:[P02009](#), p.5.

<sup>3646</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; HADŽOVIĆEdin:[P02008](#), p.8; HADŽOVIĆEdin:[P02009](#), p.5; HADŽOVIĆEdin:[P02024](#), p.10; HADŽOVIĆEdin:T.15-16(28-Mar-2018).

<sup>3647</sup> HADŽOVIĆEdin:T.17,39(28-Mar-2018); HADŽOVIĆEdin:[P02009](#), p.5; HADŽOVIĆEdin:[P02024](#), p.10.

shield to protect the Red Berets and other Serb Forces, interspersed amongst their ranks, as they advanced towards the BiH forces.<sup>3648</sup> Serb Forces, including the Red Berets and other Ozren-trained units and Doboj's Serb police, took part in the operation.<sup>3649</sup> A Red Beret with a green camouflage uniform executed a Croat detainee, as a warning to the others not to attempt escape.<sup>3650</sup> Serb Forces pushed the detainees forward, hiding behind them, and when firing started with the BiH forces in front of them, the detainees were caught in the crossfire.<sup>3651</sup> During the ensuing chaos, two men fled frontline fire and arrived back among the Serb ranks, only to be executed by Serb police upon discovering they were detainees and not Serb Forces.<sup>3652</sup> Serb Forces forced the other prisoners forward and fired on them with heavy weapons when they attempted to scale a fence near the ABiH units.<sup>3653</sup> HADŽOVIĆ escaped the violence by crawling upriver along the Usora River and eventually swimming to freedom days later.<sup>3654</sup>

853. [REDACTED].<sup>3655</sup> The bodies of the approximately 27 Muslims and Croats who died<sup>3656</sup> were buried in a mass grave in Matuzići.<sup>3657</sup>

(d) Deportation and forcible transfer<sup>3658</sup>

854. Through the attacks, murders, and other crimes outlined above, Serb Forces expelled Bosnian Muslims and Croats from Doboj.<sup>3659</sup> In 1991, Doboj was an ethnically diverse municipality, comprised of more than 61% non-Serbs.<sup>3660</sup> By 1997, the Serb

<sup>3648</sup> HADŽOVIĆEdin:[P02022](#), p.2-3; HADŽOVIĆEdin:[P02024](#), p.10-11; [REDACTED]; [REDACTED]; HADŽOVIĆEdin:[P02008](#), p.8; HADŽOVIĆEdin:[P02009](#), p.5; HADŽOVIĆEdin:[P02011](#), T.2248-2249,2302,2312; HADŽOVIĆEdin:T.15-17,39(28-Mar-2018); [REDACTED]; [REDACTED]; [REDACTED]. See [P02017](#).

<sup>3649</sup> HADŽOVIĆEdin:[P02024](#), p.10,12; HADŽOVIĆEdin:[P02008](#), p.8; HADŽOVIĆEdin:[P02009](#), p.5-6; HADŽOVIĆEdin:[P02011](#), T.2301-2303,2345-2346; HADŽOVIĆEdin:T.15-17,39(28-Mar-2018); [REDACTED]; [REDACTED]; [REDACTED].

<sup>3650</sup> [REDACTED]; [REDACTED]; [REDACTED]; HADŽOVIĆEdin:[P02008](#), p.8; HADŽOVIĆEdin:[P02009](#), p.5; HADŽOVIĆEdin:[P02011](#), T.2242,2302,2350-2351; HADŽOVIĆEdin:[P02022](#), p.2-3; HADŽOVIĆEdin:[P02024](#), p.11; HADŽOVIĆEdin:T.13,17,22,38(28-Mar-2018); [REDACTED].

<sup>3651</sup> [REDACTED]; [REDACTED]; [REDACTED]. See HADŽOVIĆEdin:[P02022](#), p.3.

<sup>3652</sup> HADŽOVIĆEdin:[P02022](#), p.3; HADŽOVIĆEdin:[P02024](#), p.11; HADŽOVIĆEdin:[P02009](#), p.6.

<sup>3653</sup> HADŽOVIĆEdin:[P02009](#), p.6; HADŽOVIĆEdin:[P02024](#), p.12. See HADŽOVIĆEdin:[P02008](#), p.8.

<sup>3654</sup> HADŽOVIĆEdin:[P02022](#), p.3; HADŽOVIĆEdin:[P02024](#), p.12; HADŽOVIĆEdin:[P02009](#), p.6; HADŽOVIĆEdin:[P02011](#), T.2303.

<sup>3655</sup> [REDACTED]; [REDACTED].

<sup>3656</sup> See [REDACTED]; [REDACTED]; [REDACTED]; HADŽOVIĆEdin:[P02019](#); HADŽOVIĆEdin:[P02011](#), T.2251-2253; [REDACTED]; [REDACTED].

<sup>3657</sup> HADŽOVIĆEdin:[P02008](#), p.8; [P02018](#); HADŽOVIĆEdin:[P02011](#), T.2249-2251.

<sup>3658</sup> Indictment, para.64-66.

<sup>3659</sup> Indictment, para.64-65.

<sup>3660</sup> TABEAUWwa:[P02069](#), p.21.

population had grown to 75.5%, and the population of Muslims and Croats had dropped from 40.1% and 12.9%, to 14.6% and 5.1%, respectively.<sup>3661</sup>

(e) The Doboj crimes are attributable to the Accused and other JCE members

855. The Serb Forces' crimes of murder, persecution, forcible transfer, and deportation are attributable to the Accused and other JCE members. Unit members and Ozren-trained Red Berets were under the command of BOŽOVIĆ<sub>(DB)</sub> and were tools of the Accused. The Serb police in Doboj were RS-MUP units and were tools of M.STANIŠIĆ. The RSK-MUP units were tools of MARTIĆ. The JNA units were tools of ADŽIĆ and MILOŠEVIĆ. From 12 May 1992, the VRS units were tools of MLADIĆ. The Doboj SDS authorities were the tools of KARADŽIĆ, PLAISIĆ, and KRAJIŠNIK. Crimes of other paramilitaries that acted in concert with the Serb Forces above are attributable to the Accused and other JCE members.

**5. Trnovo Crimes**<sup>3662</sup>

856. The Scorpions murdered six Muslim men and boys<sup>3663</sup> with discriminatory intent, amounting to persecution,<sup>3664</sup> evident from the ethnic selection of victims,<sup>3665</sup> and mockery of their leaders,<sup>3666</sup> faith,<sup>3667</sup> and cultural heritage.<sup>3668</sup>

857. On or around 27 June 1995, the Accused deployed the Scorpions, under the command of Slobodan MEDIĆ aka BOCA<sub>(DB)</sub>, from Đeletovci to the Trnovo/Treskavica front.<sup>3669</sup>

858. The Trnovo operation coincided with the VRS-led takeover of the Srebrenica enclave on 11 July 1995, following which Serb Forces captured thousands of fleeing Bosnian Muslim men and boys and systematically slaughtered them in mass executions

<sup>3661</sup> TABEAU Ewa: [P02069](#), p.21,23,28.

<sup>3662</sup> Indictment, para.60-61. *Cross-reference* AnnexC.

<sup>3663</sup> See TABEAU Ewa: [P02068](#), p.99(including two born in 1978 and one in 1979).

<sup>3664</sup> Indictment, para.22,24-25.

<sup>3665</sup> See e.g. [P01937](#), p.10.

<sup>3666</sup> [P00802](#)(01:43:45-01:43:48), p.96.

<sup>3667</sup> [P00802](#)(01:40:53-01:40:56)(01:51:02-01:51:03)(01:51:28-01:51:30)(01:51:46-01:51:48), p.91,102-103.

<sup>3668</sup> [P00802](#)(01:48:14-01:48:16), p.99(p.90(BCS))(transcribed as "jala, jala!").

<sup>3669</sup> [REDACTED]; [REDACTED]; [P00821](#), p.2; STOPARIĆGoran:T.9(8-Nov-2017); STOPARIĆGoran:T.69(30-Nov-2017); [P02317](#); [P02333](#); [P03525](#), p.2; [P00823](#), p.1. *Cross-reference* Section [II.D.2\(a\)\(v\)](#); Section [II.D.2\(c\)](#); Section [II.F.5\(b\)\(iii\)](#). See AF1234-AF1236; STOPARIĆGoran:[P00796](#), para.98.

commencing on 13 July 1995.<sup>3670</sup> Additionally, some were killed individually or in small groups by the soldiers who captured them, and others were killed where they were temporarily detained.<sup>3671</sup>

859. Between 12 and 23 July 1995,<sup>3672</sup> acting upon orders received through his chain of command, BOCA<sub>(DB)</sub> ordered Scorpions members to drive a bus and a truck to Srebrenica.<sup>3673</sup> Scorpions transported Bosnian Muslims from Srebrenica to other locations in these vehicles.<sup>3674</sup> The Scorpions used one of the trucks to transport six Bosnian Muslim men and boys from Srebrenica to an isolated location in Godinjske Bare, near the town of Trnovo.<sup>3675</sup> BOCA<sub>(DB)</sub> [REDACTED] ordered them to kill the prisoners.<sup>3676</sup>

860. Members of the Scorpions ordered the six Bosnian Muslim prisoners to get out of the truck, hands bound behind their backs, and “bow down” with their faces to the ground.<sup>3677</sup> After insulting the prisoners, the Scorpions kicked them until they got up and marched them, single file, to a grassy area behind an abandoned summer house, where they systematically executed four of the prisoners.<sup>3678</sup> Scorpions members forced the remaining two prisoners to move the bodies, then executed them.<sup>3679</sup> The six victims<sup>3680</sup> were unarmed, wearing civilian clothing.<sup>3681</sup>

<sup>3670</sup> [REDACTED]; SALKIĆOsman:[P01239](#), p.7; SALKIĆOsman:[P01241](#), T.7867-7869; IBRAHIMOVIĆRamzija:[P00390](#), para.4; [REDACTED]; SALKIĆSaidin:[P02300](#), p.2; [P01937](#), p.10. See AF1200-AF1201; AF1205; AF1207-AF1208; AF1212-AF1213; AF1219-AF1220.

<sup>3671</sup> See AF1212.

<sup>3672</sup> [P02356](#); [P02416](#); [P03537](#); [REDACTED]. See AF1213; AF1208; NIELSENChristian:[P00850](#), para.899-904; THEUNENSReynaud:[P01980](#), p.554-555.

<sup>3673</sup> [REDACTED]; [REDACTED]. See AF1208; AF1238.

<sup>3674</sup> [REDACTED]. See AF1238.

<sup>3675</sup> [REDACTED]; [REDACTED]; [P02411](#), p.2; STOPARIĆGoran:[P00798](#), para.13. See AF1237-AF1238. See also STOPARIĆGoran:[P00798](#), para.5-8,12; STOPARIĆGoran:[P00796](#), para.70,98,105; STOPARIĆGoran:T.9,27(8-Nov-2017)(indicating a DB Special Unit, referred to as the Dobojski CSB, first delivered the prisoners to BOCA<sub>(DB)</sub>).

<sup>3676</sup> [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:[P00798](#), para.12; [REDACTED]; STOPARIĆGoran:T.27(8-Nov-2017).

<sup>3677</sup> See [P00802](#)(01:39:00-01:48:00), p.89-99; [REDACTED]; [REDACTED]; STOPARIĆGoran:[P00798](#), para.13.

<sup>3678</sup> See [P00802](#)(01:47:48-01:50:57), p.99-103(e.g. “They fucking stink. Like skunks. They shit themselves” (p.89); “That’s it, now bow down, motherfuckers!” (p.91); “Nothing – no talk, silence, come on! Water my ass, fuck you! Silence! And you gave water to Serbs when you were killing them, is that right?” (p.94)); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:[P00798](#), para.13; [REDACTED]; STOPARIĆGoran:T.28(8-Nov-2017); [P03133](#). See AF1244; AF1241.

<sup>3679</sup> [P00802](#)(01:50:57-01:57:56), p.103-113; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:T.26-30(8-Nov-2017); [P03133](#). See AF1244.

861. On BOCA's<sub>(DB)</sub> orders, the Scorpions filmed the killings.<sup>3682</sup> They then made it available for rent at a video store.<sup>3683</sup> [REDACTED],<sup>3684</sup> but BOCA<sub>(DB)</sub> made no effort to retrieve the disseminated videos until sometime in 2003.<sup>3685</sup>

862. The Scorpions committed the charged murders as tools of the Accused. In addition, because they were participating in a joint operation with the VRS they were also tools of MLADIĆ.

## **6. Sanski Most Crimes**<sup>3686</sup>

863. The SDS took control over Sanski Most in April and May 1992 through an armed attack conducted by the JNA, SOS, TO and paramilitaries.<sup>3687</sup> During and following the 1992 takeover Serb Forces, including the VRS and local TO and police, followed a pattern repeated in each of JCE's target municipalities, murdering, forcibly displacing and persecuting non-Serbs. In September-October 1995, ARKAN and his SDG deployed to Sanski Most to defend previously cleansed Serb territory and purge the few remaining non-Serbs. The Serb Forces committed crimes with persecutory intent,<sup>3688</sup> as demonstrated in the ethnic targeting of non-Serb villages,<sup>3689</sup> mosques,<sup>3690</sup> and businesses,<sup>3691</sup> and the use of racial epithets<sup>3692</sup> and forcing detainees to sit like "Turks", heads bowed to the floor under threat of execution.<sup>3693</sup>

<sup>3680</sup> TABEAU Ewa: [P02068](#), p.99; TABEAU Ewa: [P02070](#), p.3-4; [REDACTED]; [P02078](#); [P03130](#); [P03131](#); [P03132](#); [P03133](#); [P03134](#); [P03135](#); IBRAHIMOVIĆ Ramzija: [P00390](#), para.1,7,9; [P00391](#); [P02302](#); SALKIĆ Osman: [P01239](#), p.8; SALKIĆ Osman: [P01240](#), p.3-8; SALKIĆ Osman: [P01241](#), T.7869-7870,7873-7874; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See AF1241-AF1243.

<sup>3681</sup> [P00802](#)(01:49:00-01:56:50); [P02301](#); SALKIĆ Saidin: [P02300](#), p.2-3,7-12; [P02302](#); SALKIĆ Osman: [P01239](#), p.7-8; SALKIĆ Osman: [P01241](#), T.7869,7873; IBRAHIMOVIĆ Ramzija: [P00390](#), para.4-5; [REDACTED]; [P00391](#); [P03133](#). See AF1216. Cross-reference Annex C.

<sup>3682</sup> STOPARIĆ Goran: [P00798](#), para.9-10; [REDACTED]; [REDACTED]; [REDACTED]. See AF1239.

<sup>3683</sup> [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆ Goran: [P00798](#), para.13; STOPARIĆ Goran: [P00796](#), para.105.

<sup>3684</sup> [REDACTED]; [REDACTED].

<sup>3685</sup> STOPARIĆ Goran: [P00796](#), para.105; [REDACTED]; [REDACTED]; [P00059](#)(00:07:45-01:02:16), p.28(Zoran ĐINDIĆ was assassinated 12 March 2003).

<sup>3686</sup> Indictment, para.22-26,55-57,64-66.

<sup>3687</sup> Cross-reference Section [II.F.4\(b\)\(iii\)b](#). See [P02664](#).

<sup>3688</sup> See Indictment, para.22-25.

<sup>3689</sup> [REDACTED].

<sup>3690</sup> [REDACTED].

<sup>3691</sup> See e.g. AF1260; AF1279.

<sup>3692</sup> [REDACTED].

<sup>3693</sup> RFJ-073:T.10(26-Jun-2018).



(a) Serb Forces targeted non-Serbs with crimes during the Sanski Most takeover

864. Tensions that had been rising in Sanski Most from 1991 gave way to violence in early 1992 when Serb Forces destroyed the mosques in the Kamengrad area.<sup>3694</sup> From March 1992, JNA forces erected checkpoints in Sanski Most town and around non-Serb villages.<sup>3695</sup> As a result of the acts of intimidation during March and April 1992, many Muslim and Croat inhabitants left the municipality.<sup>3696</sup>

865. During April and May 1992, Serb authorities took control of Sanski Most through an armed attack and discriminatory measures designed to render non-Serbs' continued existence in Sanski Most unbearable.<sup>3697</sup> On 25 May, a radio broadcast directed Muslims to hand over their weapons and identify their houses with a white flag, which they did.<sup>3698</sup>

866. The next day, on 26 May 1992, the VRS—coordinating with RS-MUP, TO and paramilitary units—attacked Sanski Most,<sup>3699</sup> by shelling the Muslim part of town and killing at least 10 people.<sup>3700</sup> [REDACTED],<sup>3701</sup> the Sanski Most TO and other Serb Forces destroyed Muslim homes and mosques, [REDACTED],<sup>3702</sup> [REDACTED].<sup>3703</sup> By September 1992, the municipality's 18 mosques were all destroyed.<sup>3704</sup>

867. Serb Forces arrested, and in some instances killed, prominent Croat and Muslim leaders.<sup>3705</sup> On 26 May, the VRS and Sanski Most TO rounded up non-Serbs and, took them to a local football stadium, sending the men to "collection centres" and forcing the women and children to leave Sanski Most.<sup>3706</sup> SDS President Nedeljko RAŠULA noted that "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".<sup>3707</sup>

<sup>3694</sup> [REDACTED]; [REDACTED]. See AF1313. See also [P02472](#).

<sup>3695</sup> See AF1267.

<sup>3696</sup> See AF1275.

<sup>3697</sup> Cross-reference Part [II.F.4\(b\)\(iii\)b](#).

<sup>3698</sup> [REDACTED]; [REDACTED]; [P02481](#), p.3. See AF1282. See also [P03563](#).

<sup>3699</sup> [P02484](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See AF847; AF911.

<sup>3700</sup> [REDACTED]. See AF1284.

<sup>3701</sup> [REDACTED]; [REDACTED]. See AF1313.

<sup>3702</sup> [REDACTED]; [REDACTED]. See AF1310.

<sup>3703</sup> [REDACTED]; [REDACTED]. See also [REDACTED]; AF1288-AF1289; [REDACTED].

<sup>3704</sup> [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>3705</sup> See AF1283; AF1298; [P02478](#), p.38-39.

<sup>3706</sup> [REDACTED]; [REDACTED]; [P02484](#), p.3. See AF1288; [REDACTED]; [P02478](#), p.38-39.

<sup>3707</sup> [P02478](#), p.38-39; [REDACTED]. Cross-reference Section [II.F.4\(b\)\(iii\)b](#). See also [REDACTED].



868. From 26 to 27 May 1992, the VRS arrested about 1,600 able-bodied Muslims and Croats—including women and children—and detained them in the Sanski Most SJB complex, the Betonirka factory’s garages, Krings Hall, and in the Hasan Kikić School’s gym, aka “Sports Hall” guarded by the police, TO, and VRS.<sup>3708</sup> [REDACTED].<sup>3709</sup> Within three days the entire municipality was under Serb Forces’ control.<sup>3710</sup>

(b) Serb Forces continued to forcibly displace non-Serbs in Sanski Most after the takeover

869. In the wake of the takeover, Serb authorities and Serb Forces created conditions aimed at expelling non-Serbs from Sanski Most.<sup>3711</sup> Attacks began with Serb Forces shelling villages,<sup>3712</sup> causing severe damage, killing non-Serbs, and forcing survivors to flee.<sup>3713</sup> Serb Forces then violently killed many remaining inhabitants.<sup>3714</sup> Non-Serb villages were “totally devastated,”<sup>3715</sup> [REDACTED].<sup>3716</sup>

870. [REDACTED].<sup>3717</sup> [REDACTED]<sup>3718</sup>—[REDACTED].<sup>3719</sup> The VRS, SOS and other Serb paramilitaries continued the campaign of violence targeting non-Serbs and their homes throughout 1992, while the Serb police declined to arrest or prosecute known perpetrators.<sup>3720</sup>

871. At the beginning of June 1992, while attacking Begići hamlet, VRS soldiers took 20-30 Bosnian Muslims to the Vrhpolje bridge, ordered them to jump off and then fired at them, killing at least 28.<sup>3721</sup> In “cleansing” Hrustovo and Vrhpolje the VRS killed, 25 Muslims, and another 19 in Kenjari.<sup>3722</sup>

872. On 14 July 1992, the War Presidency declared that Croatian and Muslim pensioners without a certificate confirming their permanent residence in Sanski Most

<sup>3708</sup> [P03499](#), p.1-2. See AF1290; AF1299-AF1300; [P02484](#), p.3; [REDACTED]; [REDACTED].

<sup>3709</sup> [REDACTED]; [P03499](#).

<sup>3710</sup> [REDACTED]; [REDACTED].

<sup>3711</sup> See AF1310. See e.g. AF1292; AF1294-1295; AF1306-1307; AF1312.

<sup>3712</sup> [REDACTED]. See AF1284.

<sup>3713</sup> [REDACTED]. See AF1286.

<sup>3714</sup> [P02659](#), p.1; [REDACTED]; [REDACTED]. See AF1286; AF1310-AF1311.

<sup>3715</sup> [REDACTED].

<sup>3716</sup> [REDACTED].

<sup>3717</sup> [REDACTED].

<sup>3718</sup> Cross-reference Section [II.F.4\(b\)\(iii\)b.](#)

<sup>3719</sup> [REDACTED]. Cross-reference Section [III.C.1\(b\).](#)

<sup>3720</sup> [P02659](#). See AF1310.

<sup>3721</sup> See AF1286; AF1297; [REDACTED]; [REDACTED].

would no longer receive their pensions,<sup>3723</sup> and only Serbs in the “socially owned sector” who were out of work due to the fighting received paid leave.<sup>3724</sup>

873. During the mass arrests on 26-27 May, as discussed above, prominent Muslims were targeted, and initially detained in the police station, then Betonirka.<sup>3725</sup> In the police station, detainees were held in unhygienic conditions, denied food and medical treatment, and beaten daily by police and soldiers..<sup>3726</sup> In Betonirka, a prison run by the police next to the police station, by July 1992 more than 100 non-Serbs were detained in similarly inhumane conditions.<sup>3727</sup> One Muslim religious leader was specifically targeted for persecution and abuse.<sup>3728</sup> Guards permitted police and even people off the street to beat the detainees “day and night.”<sup>3729</sup> [REDACTED]<sup>3730</sup> [REDACTED].<sup>3731</sup>

874. In June 1992, the Crisis Staff ordered “undesirables”, including all surviving Muslim members of the former Municipal assembly to be deported by the police, along with 150 prisoners to Manjača camp.<sup>3732</sup> The ARK municipalities’ “political representatives” concluded that “Muslims and Croats should move out of our municipalities until [...] Serbian authority can be maintained”.<sup>3733</sup> By 20 July 1992, 850 individuals had been moved to Manjača camp<sup>3734</sup> and [REDACTED].<sup>3735</sup>

875. At the sports hall in the centre of Sanski Most, Serb Forces detained [REDACTED] Muslims” under “absolutely inhumane conditions.”<sup>3736</sup> [REDACTED].<sup>3737</sup>

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<sup>3722</sup> [REDACTED]; [P02481](#), p.3; [P03569](#).

<sup>3723</sup> [P02482](#), p.1.

<sup>3724</sup> [P02482](#), p.2.

<sup>3725</sup> Cross-reference Section [III.C.6\(a\)](#). See AF1298. See also [P02478](#), p.34,38.

<sup>3726</sup> See AF1299.

<sup>3727</sup> [REDACTED]; [P03499](#), p.1-2. See AF1301.

<sup>3728</sup> See AF1302.

<sup>3729</sup> [REDACTED]. See AF1301.

<sup>3730</sup> [REDACTED].

<sup>3731</sup> [REDACTED].

<sup>3732</sup> [P01595](#); [P02485](#). [REDACTED]. See AF1265. Manjača camp clearly illustrates the systematic nature of the detention system in place from the start of the ethnic cleansing campaign. Located in Prijedor municipality, non-Serbs expelled from different municipalities were transferred to Manjača. Some were eventually removed from BiH altogether: [REDACTED]; [REDACTED]; [REDACTED].

<sup>3733</sup> [P02498](#).

<sup>3734</sup> [P03493](#), p.7; [REDACTED]. See also AF904; AF953.

<sup>3735</sup> [REDACTED]; [REDACTED]; [P03499](#), p.3.

<sup>3736</sup> [REDACTED]. See also AF1290.

<sup>3737</sup> [REDACTED].

876. On 2 July 1992, the Crisis Staff issued a decision permitting “[v]oluntary departure from Sanski Most” for anyone willing to state that they were leaving permanently, and leaving their real property to the municipality.<sup>3738</sup> On 31 July 1992, Banja Luka CSB Chief Stojan ŽUPLJANIN specified that valuables and money would be confiscated from anyone leaving the ARK.<sup>3739</sup> [REDACTED].<sup>3740</sup>

877. [REDACTED].<sup>3741</sup>

878. [REDACTED].<sup>3742</sup> [REDACTED].<sup>3743</sup> [REDACTED].<sup>3744</sup>

879. [REDACTED].<sup>3745</sup> [REDACTED].<sup>3746</sup> [REDACTED].<sup>3747</sup> At Krings Hall, the detainees were held in unhygienic conditions with 600 others.<sup>3748</sup> Serb police beat detainees with batons and rifles, killing one man.<sup>3749</sup>

880. On 21 August 1992, police from Prijedor and Sanski Most stopped a convoy of refugees at Korićanske Stijene, killed around 100 Muslims and threw their bodies into a ravine.<sup>3750</sup>

(c) Deportation and forcible transfer<sup>3751</sup>

881. Through the attacks, murders, and other crimes outlined above, Serb Forces expelled non-Serbs from Sanski Most.<sup>3752</sup> In 1992, non-Serbs “were leaving Sanski Most in massive numbers”.<sup>3753</sup> The Banja Luka CSB reported that by October 1992, as a result of abusive ethnically motivated pressure, “20,000 Muslims have moved out of [Sanski

<sup>3738</sup> [P02486](#). See also AF1304; AF1312; [P02478](#), p.32.

<sup>3739</sup> [P03496](#).

<sup>3740</sup> [REDACTED]. See also [P03505](#), p.6.

<sup>3741</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P03497](#). See also [P03568](#), p.1.

<sup>3742</sup> [REDACTED]; RFJ-073:[P02457](#), T.22512(After April 1992, Muslims were kept in their village to “do the dirtiest jobs.”); [REDACTED]; [REDACTED].

<sup>3743</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3744</sup> [REDACTED]; [REDACTED].

<sup>3745</sup> [REDACTED]; [P02498](#).

<sup>3746</sup> [REDACTED]; [REDACTED].

<sup>3747</sup> [REDACTED]. See [REDACTED].

<sup>3748</sup> [REDACTED]. See AF1303. See also [REDACTED].

<sup>3749</sup> See AF1303.

<sup>3750</sup> [P03604](#), p.2; [P03603](#). See NIELSENChristian:[P00850](#), para.787-788.

<sup>3751</sup> Indictment, para.64-66.

<sup>3752</sup> Indictment, para.64-65.

<sup>3753</sup> TABEAUWewa:[P02069](#), p.55; TABEAUWewa:[P02074](#); TABEAUWewa:T.35-36(1-May-2018). See also [P02260](#), p.2; [P02261](#), p.8; [P02066](#), p.6-8.

Most], and the remaining 10,000 or so wish to do the same.”<sup>3754</sup> [REDACTED]<sup>3755</sup> [REDACTED].<sup>3756</sup> A significant decrease in non-Serbs was evident by June 1993, whereby Muslims and Croats had dropped from 46.7 percent and 7.2 percent of the population, to 12.9 percent and 3.7 percent, respectively.<sup>3757</sup> By February 1995, Serbs constituted 88.4 percent of the total population.<sup>3758</sup> By 1997, only 5.2 percent of the population in the RS section of Sanski Most was non-Serb, down from 38.6 percent in 1991.<sup>3759</sup>

(d) ARKAN and the SDG brutalised and murdered non-Serbs who remained in Sanski Most in September 1995

882. In this context, in September 1995, the ABiH 5<sup>th</sup> Corps broke through the frontline and Serb Forces fell back to Sanski Most.<sup>3760</sup> At the request of KARADŽIĆ<sup>3761</sup> and the SDS leadership, the Accused deployed ARKAN to maintain Serb control over the ethnically cleansed territory.<sup>3762</sup>

883. Once in Sanski Most, the SDG terrorised the local population, working with RAŠULA to plunder the municipality.<sup>3763</sup> [REDACTED].<sup>3764</sup> [REDACTED].<sup>3765</sup> The SDG detained non-Serbs from various places at Hotel Sanus in Sanski Most.<sup>3766</sup> [REDACTED],<sup>3767</sup> [REDACTED].<sup>3768</sup> [REDACTED].<sup>3769</sup> [REDACTED].<sup>3770</sup> [REDACTED]<sup>3771</sup> [REDACTED].<sup>3772</sup> [REDACTED].<sup>3773</sup> MLADIĆ reported that the

<sup>3754</sup> [P02499](#), p.1-2; [REDACTED]. See also [P03497](#); [P03499](#), p.2-3.

<sup>3755</sup> [REDACTED].

<sup>3756</sup> [REDACTED].

<sup>3757</sup> TABEAUWwa:T.40(1-May-2018). See also [REDACTED].

<sup>3758</sup> TABEAUWwa:T.40-41(1-May-2018); TABEAUWwa:[P02069](#), p.55.

<sup>3759</sup> TABEAUWwa:[P02069](#), p.55,69. See also [REDACTED].

<sup>3760</sup> [REDACTED]; [REDACTED].

<sup>3761</sup> [2D00160](#); THEUNENSReynaud:T.57(22-Mar-2018); THEUNENSReynaud:[P01980](#), p.559-562; MILOVANOVIĆManojlo:[P02934](#), T.4397-4398; [P00059](#), p.44-45. But see MILOVANOVIĆManojlo:[P02935](#), T.15559-15560.

<sup>3762</sup> Cross-reference Section [II.F.5\(b\)\(iv\)b](#). Indictment, para.55.

<sup>3763</sup> [P02351](#); [REDACTED]; [REDACTED]. [REDACTED]. See also THEUNENSReynaud:[P01980](#), p.559; [REDACTED].

<sup>3764</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3765</sup> [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>3766</sup> [REDACTED]; RFJ-073:[P02457](#), T.22484,22496-22499; [REDACTED]; [REDACTED].

<sup>3767</sup> [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>3768</sup> [REDACTED]; [REDACTED]. See also [REDACTED].

<sup>3769</sup> [REDACTED]; [REDACTED]; RFJ-073:[P02457](#), T.22486,22496. See also [REDACTED].

<sup>3770</sup> RFJ-073:[P02457](#), T.22495; [REDACTED]; RFJ-073:T.22(26-Jun-2018).

<sup>3771</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See also [REDACTED]; RFJ-073:T.11(26-Jun-2018).

<sup>3772</sup> [REDACTED]; [REDACTED]; [REDACTED].

SDG had arrested “all the Muslims in Sanski Most”, a number of whom they “liquidated”.<sup>3774</sup>

(i) Trnova massacre<sup>3775</sup>

884. On 20 September 1995, SDG members massacred 11 non-Serb detainees in Trnova.<sup>3776</sup> Early that morning, ARKAN’s men<sup>3777</sup> handcuffed [REDACTED] detainees in pairs—including RFJ-073—and forced them onto a truck.<sup>3778</sup> Fifteen minutes later, they arrived in Trnova where SDG members unloaded them in pairs.<sup>3779</sup> RFJ-073 heard gunshots a short time after each pair disembarked.<sup>3780</sup> [REDACTED].<sup>3781</sup>

885. SDG members took detainees to a nearby garage where RFJ-073 saw bodies lying in pools of blood.<sup>3782</sup> RFJ-073’s handcuffs were removed and he was ordered into the garage.<sup>3783</sup> Almost immediately,<sup>3784</sup> a bullet struck RFJ-073 in the shoulder and he fell hard, breaking two ribs in the process. Although struck by two more bullets, RFJ-073 survived.<sup>3785</sup> He lay still as the soldiers brought in and killed four more detainees.<sup>3786</sup> ARKAN’s SDG slit the throats of the final two prisoners, which sprayed the face of RFJ-073 with blood, before shooting each dying or deceased victim in the head.<sup>3787</sup>

886. On 18 October 1995, ABiH soldiers discovered 11 bodies in Trnova.<sup>3788</sup> In video footage of the corpses, RFJ-073 recognised [REDACTED] ŠEHIĆ’s sweater, worn the day he was killed.<sup>3789</sup>

<sup>3773</sup> [REDACTED]; [REDACTED].

<sup>3774</sup> [2D00160](#). See also THEUNENSReynaud:T.57(22-Mar-2018); THEUNENSReynaud:[P01980](#), p.558-562.

<sup>3775</sup> Indictment, para.56. *Cross-reference* AnnexC.

<sup>3776</sup> *Cross-reference* AnnexC.

<sup>3777</sup> RFJ-073:[P02457](#), T.22501-22502; [REDACTED].

<sup>3778</sup> [REDACTED]; RFJ-073:T.11-12(26-Jun-2018); RFJ-073:[P02457](#), T.22502; [REDACTED].

<sup>3779</sup> RFJ-073:[P02457](#), T.22507; RFJ-073:T.11(26-Jun-2018); [REDACTED].

<sup>3780</sup> [REDACTED]; RFJ-073:[P02457](#), T.22502-22503,22522-22523.

<sup>3781</sup> [REDACTED].

<sup>3782</sup> RFJ-073:[P02457](#), T.22502-22503,22505; RFJ-073:T.12(26-Jun-2018); [REDACTED]. See [P02461](#); [REDACTED].

<sup>3783</sup> RFJ-073:T.12,15-17(26-Jun-2018); [REDACTED]; RFJ-073:[P02457](#), T.22503; [REDACTED].

<sup>3784</sup> RFJ-073:[P02457](#), T.22524-22525; RFJ-073:T.12(26-Jun-2018).

<sup>3785</sup> RFJ-073:[P02457](#), T.22503-22504,22524-22525; RFJ-073:T.12-13(26-Jun-2018); [REDACTED].

<sup>3786</sup> RFJ-073:[P02457](#), T.22503-22504; RFJ-073:T.12-13(26-Jun-2018); [REDACTED].

<sup>3787</sup> RFJ-073:[P02457](#), T.22504; [REDACTED]; RFJ-073:T.12-13(26-Jun-2018).

<sup>3788</sup> [P02076/P02174](#); RFJ-073:T.11,24(26-Jun-2018). See [P02472](#); [P02466](#); [P02175](#); [P02176](#); [P02177](#); [P02178](#); [P02179](#); [P02180](#). *Cross-reference* AnnexC.

<sup>3789</sup> RFJ-073:[P02457](#), T.22508,22525,22536; [REDACTED]; [P02466](#)(00:02:17-00:02:53); [P02472](#)(00:01:43).

(ii) Sasina massacre<sup>3790</sup>

887. On 20-22 September 1995, ARKAN'S SDG murdered approximately 65<sup>3791</sup> non-Serbs at Sasina.<sup>3792</sup> [REDACTED].<sup>3793</sup> On 21 September 1995, armed SDG members forced men onto buses, [REDACTED].<sup>3794</sup> [REDACTED],<sup>3795</sup> [REDACTED].<sup>3796</sup> [REDACTED]<sup>3797</sup> [REDACTED].<sup>3798</sup>

888. The bus then drove to Sasina<sup>3799</sup> where SDG members offloaded people in small groups.<sup>3800</sup> [REDACTED].<sup>3801</sup>

889. [REDACTED].<sup>3802</sup> [REDACTED].<sup>3803</sup> [REDACTED].<sup>3804</sup> [REDACTED].<sup>3805</sup>

890. In 1996, 65 bodies were exhumed from two sites at Sasina.<sup>3806</sup> [REDACTED]<sup>3807</sup> [REDACTED].<sup>3808</sup> [REDACTED].<sup>3809</sup>

891. [REDACTED].<sup>3810</sup> [REDACTED].<sup>3811</sup> [REDACTED].<sup>3812</sup> [REDACTED].<sup>3813</sup> [REDACTED].<sup>3814</sup> [REDACTED].<sup>3815</sup> On 10 October 1995 the ABiH captured Sanski Most [REDACTED].<sup>3816</sup>

<sup>3790</sup> Indictment, para.57. *Cross-reference* AnnexC.

<sup>3791</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3792</sup> Indictment, para.57. The Prosecution charged approximately 65 murders and identified 69 named victims in the Pre-Trial Brief. 64 victims are named in TABEAUW: [P02068](#), p.79-98; Annex 5, Table 1, p.61, with an additional 5 victims listed Annex 5, Table 2. A chart for "Proof of Death Documentation" for all 69 victims is provided at p.79-98. *See* [REDACTED]; TABEAUW: [P02071](#), p.2; TABEAUW: [P02070](#), p.3. *Cross-reference* AnnexC.

<sup>3793</sup> [REDACTED]; [REDACTED]. *See also* [REDACTED].

<sup>3794</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3795</sup> [REDACTED]; [REDACTED]. *See also* [REDACTED].

<sup>3796</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *See* [P02136](#).

<sup>3797</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3798</sup> [REDACTED]; [REDACTED].

<sup>3799</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3800</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3801</sup> [REDACTED].

<sup>3802</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3803</sup> [REDACTED]; [REDACTED].

<sup>3804</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3805</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3806</sup> [P02079](#), p.1-3. *Cross-reference* AnnexC. *See also* [REDACTED]; [REDACTED]; [P02080](#).

<sup>3807</sup> [P02079](#), p.8; [P02080](#), p.95-96; [REDACTED]. *See also* [P02351](#); [REDACTED]; [P02136](#).

<sup>3808</sup> [REDACTED].

<sup>3809</sup> [REDACTED]; [REDACTED].

<sup>3810</sup> [REDACTED]; [REDACTED]; [REDACTED]. *Cross-reference* Section [III.C.6\(d\)](#).

<sup>3811</sup> [REDACTED]; [REDACTED]. *See also* [REDACTED].

<sup>3812</sup> [REDACTED]; [REDACTED].

<sup>3813</sup> [REDACTED].

(c) The Sanski Most crimes are attributable to the Accused and other JCE members

892. The Serb Forces' crimes of murder, persecution, forcible transfer, and deportation are attributable to the Accused and other JCE members. The SDG members were tools of ARKAN and the Accused. The Serb police in Sanski Most were RS-MUP units and were tools of M.STANIŠIĆ in 1992. The JNA was a tool of ADŽIĆ and MILOŠEVIĆ. From 12 May 1992, the VRS units were tools of MLADIĆ. The SDS Crisis Staff, SOS paramilitary and Sanski Most TO were tools of KARADŽIĆ, KRAJIŠNIK, and PLAVSIĆ. Others acted in concert with the Serb Forces above, including other paramilitaries, in the commission of the crimes, which are thus attributable to the Accused and other JCE members.

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<sup>3814</sup> [REDACTED]; [REDACTED]; [REDACTED].  
<sup>3815</sup> [REDACTED]; [REDACTED].  
<sup>3816</sup> [REDACTED]; [REDACTED]; [REDACTED].



## IV. JCE LIABILITY

### A. Overview

893. For the reasons set forth in Sections II, III, and IV, the Accused are responsible, through their membership in the JCE, for all of the crimes charged in the Indictment pursuant to Article 1 of the IRMCT Statute<sup>3817</sup> and Article 7(1) of the ICTY Statute.<sup>3818</sup> The Accused are liable for the charged crimes under the first form of JCE liability (JCE I), because: (i) the Accused were part of a plurality of persons;<sup>3819</sup> (ii) there was a common plan, design or purpose—the CCP—which amounted to or involved the commission of crimes enumerated in the Statute;<sup>3820</sup> (iii) the Accused participated in the implementation of the CCP, making significant contributions to the execution of the crimes forming part of the CCP;<sup>3821</sup> and (iv) the JCE participants, including the Accused, shared the intent for the CCP and for the statutory crimes through which it was achieved.<sup>3822</sup>

894. In the event the Trial Chamber determines that one or more of the charged crimes do not fall within the CCP to forcibly and permanently remove the majority of non-Serbs from large areas of Croatia and BiH through the commission of crimes, that common purpose included at least the crimes of forcible transfer and deportation as charged in Counts 4 and 5, and it was foreseeable that persecution and the charged murders might be perpetrated by JCE members, or persons used by such members, to carry out crimes forming part of the CCP. The Accused were aware that such crimes were a possible consequence of the implementation of the common purpose, and willingly took that risk.<sup>3823</sup>

<sup>3817</sup> IRMCT Statute, Article 1.

<sup>3818</sup> ICTY Statute, Article 7(1).

<sup>3819</sup> *Mladić* TJ, para.3561; *Milutinović* TJ, para.97-98; *Brdanin* AJ, para.364; *Stakić* AJ, para.64; *Tadić* AJ, para.227. Cross-reference Section II.

<sup>3820</sup> *Mladić* TJ, para.3561; *Milutinović* TJ, para.97,99-102; *Tadić* AJ, para.227; *Stakić* AJ, para.64; *Brdanin* AJ, para.364,418; *Kvočka* AJ, para.115-119. Cross-reference Section II; Section III.

<sup>3821</sup> *Mladić* TJ, para.3561; *Milutinović* TJ, para.97,103-104; *Brdanin* AJ, para.364,410-413,430; *Stakić* AJ, para.64; *Tadić* AJ, para.227; *Krajišnik* AJ, para.675. Cross-reference Section II; Section IV.B.

<sup>3822</sup> *Mladić* TJ, para.3561; *Tadić* AJ, para. 227; *Milutinović* TJ, para.108-109; *Brdanin* AJ, para.365; *Kvočka* AJ, para.82; *Vasiljević* AJ, para.97,101. See also *Blaškić* AJ, para.33. Cross-reference Section II; Section IV.C.

<sup>3823</sup> See Indictment, para.14; *Karadžić* JCE 3 Foreseeability AD, para.18; *Šainović* AJ, para.1557; *Brdanin* AJ, paras.365,411; *Mladić* TJ, para.3560.

895. This section details the Accused's significant contributions to the CCP; and demonstrates that the Accused shared the *mens rea* for the JCE's CCP, and the intent for the charged crimes.

## **B. STANIŠIĆ and SIMATOVIĆ significantly contributed to the CCP**

896. The Accused significantly contributed to the CCP by forming and training Serb Forces that engaged in ethnic cleansing operations and providing them the direction and means to implement the CCP. This direction and support was unwavering, even as the criminal means Serb Forces used to implement the CCP became obvious to all. Using their high-level positions in the SerbianDB, the Accused established and maintained channels of communication and authority to monitor and facilitate the implementation of the CCP as it unfolded. Neither Accused condemned or sought to disassociate himself from the criminality of the Serb Forces they and their co-JCE members controlled. Instead, they continued to provide them with the means and direction to execute the CCP.

### **1. STANIŠIĆ and SIMATOVIĆ contributed to the CCP by forming, training financing, and providing logistical support and other substantial assistance, including weapons, to Serb Forces that committed crimes during the Indictment period**<sup>3824</sup>

897. Throughout the Indictment period, the Accused continuously contributed to the CCP by forming, training, financing and/or providing logistical support and other substantial assistance, including weapons, to Serb Forces in Krajina, SBWS, and BiH. This contribution was particularly significant with respect to the following:

- The Accused established their SerbianDB Unit in May 1991, providing training, weaponry, uniforms, equipment, and financing. They deployed the Unit in ethnic cleansing operations in Croatia and BiH where they committed crimes furthering the CCP and participated in joint operations where other Serb Forces furthered the CCP.<sup>3825</sup>

<sup>3824</sup> Indictment, para.15(b)-(c).

<sup>3825</sup> Cross-reference Section [II.D.2\(a\)\(i\)](#),(iii),(iv),(v); Section [II.F.1\(c\)\(ii\)](#),(iii); Section [II.F.2\(f\)\(ii\)](#); Section [II.F.2\(h\)](#); Section [II.F.3\(d\)](#); Section [II.F.4\(b\)\(ii\)a-d](#); Section [II.F.4\(b\)\(iv\)](#); Section [III.B.1\(b\)](#); Section [III.B.1\(c\)\(i\)](#),(iii); Section [III.B.2\(b\)\(ii\)](#),(iv); Section [III.B.2\(d\)](#); Section [III.C](#):3-4.

- The Accused used the Unit's personnel to establish camps across Croatia, BiH and Serbia to covertly form, train, arm, and command various Serb Forces in the period 1991-1995, which were then deployed in ethnic cleansing operations in Croatia and BiH where they committed crimes furthering the CCP.<sup>3826</sup>
- The Accused financed and provided logistical support and other substantial assistance to ARKAN and his SDG, and repeatedly deployed them into ethnic cleansing operations in Croatia and BiH where they committed crimes in furtherance of the CCP.<sup>3827</sup>
- The Accused financed, trained, and provided logistical support and other substantial assistance to the Scorpions, and sent them into ethnic cleansing operations where they committed crimes furthering the CCP.<sup>3828</sup>
- The Accused, directly and through SerbianDB operatives and associates, formed, trained, financed and provided logistical support and other substantial assistance to the SAO-Krajina police. The Accused also trained and provided logistical support and other substantial assistance to other Serb Forces in SAO-Krajina, including SAO-Krajina TO units. Straight from their SerbianDB-sponsored training, MARTIĆ's Police, the SAO-Krajina TO and other Serb Forces deployed into ethnic cleansing operations across SAO-Krajina where they committed crimes furthering the CCP.<sup>3829</sup>
- **STANIŠIĆ**, through his SerbianDB subordinates, contributed to the establishment and arming of the SAO-SBWS police and SAO-SBWS TO. He used SerbianDB personnel in SBWS for this purpose, most notably KOSTIĆ<sub>(DB)</sub> and KOJIĆ<sub>(DB)</sub>, who became the first commander of the SAO-SBWS TO. The SAO-SBWS police and TO furthered the CCP by approving and committing charged crimes in SBWS.<sup>3830</sup>

<sup>3826</sup> Cross-reference Section [II.E.4](#).

<sup>3827</sup> Cross-reference Section [II.D.2\(b\)](#); Section [II.F.2\(f\)\(i\)](#); Section [II.F.2\(h\)\(i\)](#); Section [II.F.3\(d\)](#); Section [II.F.4\(b\)\(i\)a](#); Section [II.F.4\(b\)\(i\)b.iii](#); Section [II.F.5\(b\)\(ii\)](#)-(iv); Section [III.B.2\(b\)\(iii\)](#); Section [III.B.2\(c\)](#); [III.C.1-2](#); Section [III.C.6\(d\)](#).

<sup>3828</sup> Cross-reference Section [II.D.2\(c\)](#); Section [II.F.5\(b\)\(ii\)](#)-(iii); Section [II.F.5\(b\)\(v\)](#); Section [III.C.5](#).

<sup>3829</sup> Cross-reference Section [II.E.4\(a\)\(i\)](#); Section [II.F.1\(c\)\(ii\)](#)-(iii).

<sup>3830</sup> Cross-reference Section [II.F.2\(d\)](#); Section [III.B.2\(b\)-\(c\)](#).

- The Accused participated in restructuring and equipping the RSK police and TO with weaponry and equipment of the JNA to circumvent the Vance Plan's demilitarisation requirements.<sup>3831</sup>
- The Accused sent arms to Zvornik through KOSTIĆ<sub>(DB)</sub> and PAVLOVIĆ<sub>(DB)</sub> from autumn 1991, then dispatched PAVLOVIĆ<sub>(DB)</sub> to Zvornik following the takeover in April 1992, where he commanded the Zvornik TO and pursued the ethnic cleansing campaign to further the CCP.<sup>3832</sup>
- The Accused formed, trained, financed, and provided logistical support and other substantial assistance to the mixed unit they deployed into Bosanaki Šamac, consisting of veteran Unit members, former SRS volunteers, and Bosanski Šamac local Serbs, who committed crimes furthering the CCP.<sup>3833</sup>
- The Accused formed, trained, and provided logistical support and other substantial assistance to the Unit and Ozren-trained Red Berets, which included Doboj local Serbs, and sent them into operations in Doboj where they committed crimes furthering the CCP.<sup>3834</sup>
- The Accused supplied arms to various other Serb Forces controlled by their co-JCE members and more broadly to Serbs in targeted areas across Croatia and BiH throughout the Indictment period, which were used in ethnic cleansing operations furthering the CCP.<sup>3835</sup>

**2. STANIŠIĆ and SIMATOVIĆ contributed to the CCP by deploying Serb Forces into operations where they committed crimes**<sup>3836</sup>

898. The Accused deployed the Unit, SDG, and Scorpions into operations where they and other Serb Forces committed crimes.

- The Accused deployed the Unit into operations across SAO-Krajina and SAO-SBWS throughout the summer and autumn of 1991, where in joint operations

<sup>3831</sup> Cross-reference Section [II.F.3\(c\)](#).

<sup>3832</sup> Cross-reference Section [II.D.1\(c\)](#); Section [II.E.3\(a\)\(iv\)](#); Section [II.F.4\(b\)\(i\)b.i,iii-iv](#); Section [III.C.2\(b\)](#).

<sup>3833</sup> Cross-reference Section [II.D.2\(a\)\(iii\)a](#); Section [II.E.4\(b\)\(ii\)-\(iii\)](#); Section [II.F.4\(b\)\(ii\)\(a\)](#); Section [III.C.3.](#)

<sup>3834</sup> Cross-reference Section [II.D.2\(a\)\(iii\)c](#); Section [II.E.4\(c\)\(ii\)](#); Section [II.F.4\(b\)\(ii\)c](#); Section [III.C.4.](#)

<sup>3835</sup> Cross-reference Section [II.E.3.](#)

with other Serb Forces they displaced thousands of non-Serbs to further the CCP.<sup>3837</sup> **SIMATOVIĆ** commanded the Unit in Operation Žaoka and in attacks on Lovinac and Saborsko area.

- From their camp at Pajzoš, the Accused deployed the Unit, under Unit member Dragan ĐORĐEVIĆ aka CRNI<sub>(DB)</sub>, to take over Bosanski Šamac in April 1992 where they contributed to the forcible removal of the non-Serb population.<sup>3838</sup>
- The Accused deployed the Unit under Unit member IVANOVIĆ<sub>(DB)</sub> to take over Brčko where he and other Serb Forces forcibly removed the non-Serb population.<sup>3839</sup>
- The Accused again deployed the Unit, under Unit member BOŽOVIĆ<sub>(DB)</sub>, to Doboj in May 1992;<sup>3840</sup> the Podrinje operations in eastern BiH in early 1993;<sup>3841</sup> and the ARK operations in September 1995,<sup>3842</sup> where they committed crimes to forcibly remove the non-Serb population.
- In 1992-1993, the Accused deployed the Red Berets units they had formed, trained, financed, and equipped into operations along the Posavina Corridor and the Podrinje, where they committed crimes to further the CCP, notably the Pajzoš-trained Red Berets under CRNI<sub>(DB)</sub>,<sup>3843</sup> the Ozren-trained Red Berets<sup>3844</sup> and the Skelani Red Berets<sup>3845</sup> under BOŽOVIĆ<sub>(DB)</sub>, and the Bratunac Red Berets under MIJOVIĆ<sub>(DB)</sub>.<sup>3846</sup>
- The Accused deployed ARKAN and the SDG throughout the Indictment period into operations in Croatia and BiH where they committed crimes furthering the CCP, beginning with SAO-SBWS in the summer and fall of 1991,<sup>3847</sup> Bijeljina,

<sup>3836</sup> Indictment, para.15(c).

<sup>3837</sup> Cross-reference Section [II.D.2\(a\)\(i\)](#); Section [II.F.2\(f\)\(ii\)a-c](#); Section [II.F.1\(c\)\(ii\)a,c](#); Section [III.B.1\(b\)\(i\)-\(ii\)](#); Section [III.B.1\(c\)\(iii\)](#); Section [III.B.2\(a\)-\(c\)](#).

<sup>3838</sup> Cross-reference Section [II.D.2\(a\)\(iii\)a](#); Section [II.F.4\(b\)\(ii\)a](#); Section [III.C.3\(d\)](#).

<sup>3839</sup> Cross-reference Section [II.D.2\(a\)\(iii\)b](#); Section [II.F.4\(b\)\(ii\)b](#).

<sup>3840</sup> Cross-reference Section [III.C.4\(a\)](#); Section [II.F.4\(b\)\(ii\)c](#); Section [III.C.4](#).

<sup>3841</sup> Cross-reference Section [II.D.2\(a\)\(iv\)b](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>3842</sup> Cross-reference Section [II.D.2\(a\)\(v\)](#); Section [II.F.5\(b\)\(iv\)](#).

<sup>3843</sup> Cross-reference Section [II.D.2\(a\)\(iii\)a](#); Section [III.C.3](#).

<sup>3844</sup> Cross-reference Section [II.D.2\(a\)\(iii\)c](#); Section [II.F.4\(b\)\(ii\)c](#); Section [III.C.4](#).

<sup>3845</sup> Cross-reference Section [II.D.2\(a\)\(iv\)a](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>3846</sup> Cross-reference Section [II.D.2\(a\)\(iv\)a](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>3847</sup> Cross-reference Section [II.D.2\(b\)\(i\)](#); Section [II.F.2](#); Section [III.B.2](#).

Zvornik and Brčko in 1992,<sup>3848</sup> Pauk in 1994,<sup>3849</sup> Trnovo/Treskavica,<sup>3850</sup> Sanski Most<sup>3851</sup> and SBWS<sup>3852</sup> in 1995.

- From 1994 to 1995, the Accused repeatedly deployed the Scorpions into operations with the Unit and SDG.<sup>3853</sup> After the Scorpions brutalised prisoners during Operation Pauk,<sup>3854</sup> the Accused deployed them into the Trnovo/Treskavica operation with the SDG, commanded by Unit member MIJOVIĆ<sub>(DB)</sub>. During this deployment the Scorpions filmed themselves murdering prisoners from Srebrenica.<sup>3855</sup> Weeks later the Accused again deployed the Scorpions alongside the SDG and the Unit in SAO-SBWS.<sup>3856</sup>

**3. STANIŠIĆ and SIMATOVIĆ established and maintained channels of communication and authority to advance the CCP<sup>3857</sup>**

899. Underpinning their other contributions, the Accused cultivated a network within the Serb structures in Croatia, BiH, and Serbia. The Accused were at the centre of this network: relaying information, resolving disagreements, ensuring placement of individuals in important positions and monitoring developments to efficiently advance the CCP:

- STANIŠIĆ facilitated meetings and communication between MILOŠEVIĆ and MARTIĆ, BABIĆ, HADŽIĆ, and KARADŽIĆ.<sup>3858</sup>
- The Accused resolved disagreements between JCE members when they threatened the CCP's success. [REDACTED].<sup>3859</sup>
- Playing significant roles in the Krajina "parallel structure" and the *vojna linija*, the Accused facilitated coordination and communication between the SerbianDB,

<sup>3848</sup> Cross-reference Section [II.D.2\(b\)\(iv\)](#); Section [II.F.4\(b\)\(ii\)a-b](#).

<sup>3849</sup> Cross-reference Section [II.D.2\(b\)\(v\)-\(vi\)](#); Section [II.F.5\(b\)\(ii\)](#).

<sup>3850</sup> Cross-reference Section [II.D.2\(b\)\(v\)](#); Section [II.F.5\(b\)\(iii\)](#).

<sup>3851</sup> Cross-reference Section [II.D.2\(b\)\(v\)](#); Section [II.F.5\(b\)iv](#); Section [III.C.6](#).

<sup>3852</sup> Cross-reference Section [II.F.5\(b\)\(v\)](#).

<sup>3853</sup> Cross-reference Section [II.D.2\(c\)](#).

<sup>3854</sup> Cross-reference Section [II.F.5\(b\)\(ii\)b-c](#).

<sup>3855</sup> Cross-reference Section [III.C.5](#).

<sup>3856</sup> Cross-reference Section [II.F.5\(b\)\(v\)](#).

<sup>3857</sup> Indictment, para.15(a),16.

<sup>3858</sup> Cross-reference Section [II.E.2](#); Section [II.F.1\(a\)\(i\)b](#); Section [II.F.2\(a\)\(ii\)](#); Section [II.F.4\(a\)\(ii\)a](#).

<sup>3859</sup> [REDACTED].

SMUP and military personnel in order to circumvent lawful authorities and structures to ensure implementation of the CCP.<sup>3860</sup>

- The Accused acted as MILOŠEVIĆ's proxies from Belgrade and on the ground, travelling personally to Croatia and BiH, relaying his instructions and implementing his will.<sup>3861</sup>
- The Accused embedded a network of SerbianDB operatives and associates throughout Serb structures in Croatia and BiH who facilitated the various contributions of the Accused, including arming and commanding Serb Forces such as police and TO forces.<sup>3862</sup>
- The Accused established parallel lines of reporting in the separate police and state security structures in Croatia and BiH, often receiving information before the intended hierarchical recipient.<sup>3863</sup>
- The Accused used information they received to refine their other contributions to the CCP. For example, STANIŠIĆ met regularly with the President of the Association for Serbian Émigrés, enabling JCE members to assess where weapons and equipment were needed.<sup>3864</sup>

**4. STANIŠIĆ and SIMATOVIĆ did not instruct their units to refrain from committing unlawful acts**<sup>3865</sup>

900. The Accused contributed to the CCP by failing to instruct SerbianDB units under their control to refrain from committing crimes. The Accused had a duty to take measures to ensure their units did not commit crimes.<sup>3866</sup> Instead, despite knowing of their crimes,

<sup>3860</sup> Cross-reference Section [II.E.1\(a\)-\(b\)](#).

<sup>3861</sup> Cross-reference Section [II.F.1\(b\)\(ii\)](#); Section [II.F.1\(c\)\(ii\)c](#); Section [II.F.4\(a\)\(i\)](#); Section [II.F.3\(a\)](#); Section [II.F.5\(a\)\(iii\)](#); Section [IV.C.5\(a\)](#).

<sup>3862</sup> Cross-reference Section [II.B.3\(c\)](#); Section [II.D.1](#); Section [II.E.3\(a\)\(iv\)a-c](#); Section [II.F.1\(b\)\(i\)b](#); Section [II.F.2\(b\)-\(d\)](#); Section [II.F.3\(b\)](#); Section [II.F.4\(a\)\(ii\)b.ii](#); Section [II.F.4\(b\)\(i\)b.iv](#).

<sup>3863</sup> Cross-reference Section [II.B.3\(c\)](#); Section [II.F.1\(b\)\(i\)b](#); Section [II.F.2\(b\)](#); Section [II.F.2\(d\)\(iii\)](#); Section [II.F.3\(b\)](#); Section [II.F.4\(a\)\(ii\)b.ii](#).

<sup>3864</sup> Cross-reference Section [II.E.3\(a\)\(iii\)](#).

<sup>3865</sup> Indictment, para.15(c).

<sup>3866</sup> *Popović*AJ, para.1792; *Šainović*AJ, para.1678,1679.



the Accused did nothing to stop them,<sup>3867</sup> and continuously supported and deployed their SerbianDB units.<sup>3868</sup>

901. When others attempted to prevent or punish these crimes, the Accused intervened to ensure their impunity.<sup>3869</sup> Neither Accused expressed disapproval of the CCP crimes committed by their own units or those of their co-JCE members, while implementing the CCP in Croatia and BiH for over four and one-half years.

### C. STANIŠIĆ and SIMATOVIĆ intended the crimes that formed the CCP

902. STANIŠIĆ and SIMATOVIĆ shared the CCP with each other and with other JCE members, intending that persecution, forcible transfer, deportation, and murder of countless non-Serbs should be carried out to permanently remove them from the claimed territories in Croatia and BiH. Each Accused demonstrated his intent by his own actions, exercising authority and influence as high-level officials of the SerbianDB. Despite their unfettered access to information about the political and military events unfolding in Serbia, Croatia, and BiH, foremost of which was the massive forced displacement of non-Serbs by the Serb Forces they established and directed, the Accused continuously supported and used those Serb Forces to implement the CCP. This is because they intended the crimes forming part of the CCP.

903. The Accused's shared intent is shown by: their statements, including the context in which they made these statements; their personal involvement in planning and executing expulsion operations; their repeated deployment and/or provision of multi-faceted support to Serb Forces who had committed and continued to commit the crimes; the extensive period during which the Accused participated in in these events while knowing of the criminal campaign unfolding in Croatia and BiH;<sup>3870</sup> and their consequent failure to prevent or punish the perpetrators. The Accused's shared intent is further supported by their continuous cooperation with other JCE members who expressed their intent for the crimes and whose forces engaged in a pattern of systematic criminality.

<sup>3867</sup> Cross-reference Section [II.F.3\(d\)](#); Section [IV.C.7](#).

<sup>3868</sup> Cross-reference Section [IV.C.4](#).

<sup>3869</sup> Cross-reference Section [II.D.2\(a\)\(iii\)](#)a-b; Section [IV.C.4\(b\)](#).

<sup>3870</sup> *Mens rea* for a common criminal purpose may be inferred from knowledge combined with continuing participation in the JCE: *Prlić* AJ, para.2590; *Krajišnik* AJ, para.697; *Đorđević* AJ, para.512-513; *Popović* AJ, para.1652; *Stanišić & Župljanin* AJ, para.393.

**1. The preparatory actions STANIŠIĆ and SIMATOVIĆ took before the CCP crystallised demonstrate their intent**<sup>3871</sup>

904. Both Accused took a leading role early in the process that led to implementation of the CCP in Croatia – during the second half of 1990 and early 1991.<sup>3872</sup> STANIŠIĆ demonstrated his intent by covertly exercising his authority and influence to prop up Serb leaders who opposed seeking a peaceful resolution or coexistence with non-Serbs, and promoted anti-Croat sentiments among Croatia’s Serb population: notably, Milan BABIĆ and Milan MARTIĆ in Krajina, and Goran HADŽIĆ in SBWS.<sup>3873</sup> SIMATOVIĆ demonstrated his intent on the ground in Krajina by ensuring an adequate flow of arms, money, and other support to MARTIĆ and other Serb extremists.<sup>3874</sup> The actions each Accused took between late 1990 and April 1991 demonstrate that by April 1991, each shared the intent to commit the charged crimes to remove non-Serbs from large portions of Croatia and BiH.

**2. STANIŠIĆ and SIMATOVIĆ were well-informed that crimes were committed as they made their ongoing contributions**

905. Although STANIŠIĆ and SIMATOVIĆ knew that CCP crimes were committed in pursuit of the goal of ethnic separation, they continued to contribute to the CCP from April 1991 to December 1995, confirming their shared intent for the crimes falling within the CCP.<sup>3875</sup>

906. It is settled law that “knowledge combined with continuing participation can be conclusive as to a person’s intent.”<sup>3876</sup> That was never more true than with these Accused in this case. It was their job to know, and they were very good at their job.<sup>3877</sup> As STANIŠIĆ said to KARADŽIĆ in January, 1992: “I don’t know how much you know, but we know everything.”<sup>3878</sup>

<sup>3871</sup> The ICTY Appeals Chamber has repeatedly confirmed that evidence of an accused’s actions in the period before the Indictment period charged can be relied upon to establish the Accused’s *mens rea* during the Indictment period: *Đorđević* AJ, para.295; *Prlić* AJ, para.; *Tolimir* AJ, para.565.

<sup>3872</sup> Cross-reference Section [II.F.1](#).

<sup>3873</sup> Cross-reference Section [II.F.1\(a\)](#); Section [II.F.2\(a\)](#).

<sup>3874</sup> Cross-reference Section [II.E.3\(a\)\(i\)](#); Section [II.F.1\(a\)\(i\)b](#); Section [II.F.1\(b\)\(i\)a](#).

<sup>3875</sup> See *Krajišnik* AJ, para.697.

<sup>3876</sup> See *Krajišnik* AJ, para.697.

<sup>3877</sup> Cross-reference Section [II.B](#).

<sup>3878</sup> [P02792](#), p.7.

907. Through official SerbianDB channels and methods, and less official reporting lines and networks they established and cultivated, **STANIŠIĆ** and **SIMATOVIĆ** received detailed information from the ground in Serb-claimed territories in Croatia and BiH from at least 1991 through 1995.<sup>3879</sup>

908. In addition, **STANIŠIĆ** regularly participated in high-level meetings with other JCE members through which he knew about their intentions and contributions to events unfolding in Croatia and BiH, and was informed of the crimes falling within the CCP. From mid-1990 and continuing throughout 1991, **STANIŠIĆ** met continuously with fellow JCE members **MARTIĆ** and **BABIĆ** to ensure that he remained informed about the events in Krajina.<sup>3880</sup> [REDACTED].<sup>3881</sup> Throughout 1991 he met with **HADŽIĆ** and officials from the SBWS MUP, government and TO, and the JNA, regarding events in SBWS.<sup>3882</sup> He continued meeting with RSK leaders throughout the Indictment period, including **HADŽIĆ**, **MARTIĆ**, **BABIĆ**, and Ministers and Assistant Ministers who reported directly to him about the RSK.<sup>3883</sup> **STANIŠIĆ** was in frequent contact with **KARADŽIĆ** as BiH moved toward war.<sup>3884</sup> In 1991-1992, he met with and communicated with regional Bosnian Serb leaders, including **BRĐANIN** (ARK),<sup>3885</sup> [REDACTED], and **TODOROVIĆ** (Bosanski Šamac).<sup>3886</sup> **STANIŠIĆ**'s participation in high-level meetings with other JCE members from 1993 to 1995, as detailed above,<sup>3887</sup> kept him well-informed about the activities of Serb police, military, and paramilitary forces in RS and RSK. It is impossible he was unaware of their crimes.

909. **STANIŠIĆ** regularly impressed officials with his comprehensive and nuanced understanding of the forces and events on the ground in the areas where JCE members

<sup>3879</sup> Cross-reference Section [II.B.3\(c\)](#).

<sup>3880</sup> Cross-reference Section [II.F.1\(a\)\(i\)b](#).

<sup>3881</sup> [REDACTED].

<sup>3882</sup> Cross-reference Section [II.F.2\(a\)](#). VASILJEVIĆAleksandar:T.17,48(5-Feb-2019); VASILJEVIĆAleksandar:T.10-11,16(31-Jan-2019); VASILJEVIĆAleksandar:[P02695](#), T.15867; VASILJEVIĆAleksandar:T.38-39,50-51(30-Jan-2019); VASILJEVIĆAleksandar:T.7-8(6-Feb-2019); [REDACTED]; [REDACTED]; BOGUNOVIĆBorislav:[P02719](#), para.15; BOGUNOVIĆBorislav:[P02720](#), T.5973-5974; BOGUNOVIĆBorislav:[P02718](#), para.82.

<sup>3883</sup> E.g. VASILJEVIĆAleksandar:[P02695](#), T.15867; [REDACTED]; [P02787](#), p.1,3; [REDACTED]; **BABIĆ**Milan:[P01246](#), T.13083-13086. Cross-reference Section [II.D.1\(b\)](#); Section [II.F.3\(b\)](#).

<sup>3884</sup> [P02787](#); [P01505](#), p.2-5; [P02790](#), p.7; [P02792](#), p.5; [P01471](#), p.4,6(**KARADŽIĆ** referred to **STANIŠIĆ** as "Joca"). Cross-reference Section [II.F.4\(a\)\(ii\)a](#).

<sup>3885</sup> [P02772](#), p.2,6; [P00836](#).

<sup>3886</sup> AnnexA; [REDACTED]; [P01988](#).

<sup>3887</sup> Cross-reference Section [II.F.5](#).

were pursuing their CCP, at times knowing more than these officials about their own areas of responsibility:<sup>3888</sup>

- MARTIĆ, as MUP Minister of SAO-Krajina and then RSK, [REDACTED].<sup>3889</sup>
- RFJ-113, [REDACTED], observed **STANIŠIĆ**'s knowledge of both the situation around Vukovar and the equipment in the Serb Forces' possession in SBWS in September 1991.<sup>3890</sup>
- VASILJEVIĆ, as head of the JNA Security Administration, acknowledged that **STANIŠIĆ**'s information about the numbers and affiliations of armed Serb paramilitaries in SAO-SBWS just after the fall of Vukovar in 1991 was "quite precise".<sup>3891</sup>
- **STANIŠIĆ** met with forty-four commanders in SBWS and "explained the situation" to them—referring to the political plans for the region—in early 1992.<sup>3892</sup>
- [REDACTED].<sup>3893</sup>
- MILOVANOVIĆ, MLADIĆ's Chief of Staff in the VRS, was "amazed" by **STANIŠIĆ**'s comprehensive understanding about the events on the ground in eastern BiH directly before their 1993 operations,<sup>3894</sup> down to who was fighting in which village, who was in command.<sup>3895</sup>

910. **SIMATOVIĆ** met regularly with Serb leadership on the ground where the CCP was implemented throughout the Indictment period. His presence in SAO-Krajina in late 1990 and continuously during the critical months of April through July 1991 gave MARTIĆ unparalleled access to **STANIŠIĆ**, and gave **STANIŠIĆ** unparalleled knowledge of MARTIĆ, his attitude toward non-Serbs and the status of Krajina forces,

<sup>3888</sup> E.g. MILOVANOVIĆManojlo:[P02934](#), T.4383-4384; [P03191](#); [P01994](#), p.3-5; [P01997](#), p.1-2; [P02792](#), p.7.

<sup>3889</sup> [REDACTED]; [REDACTED].

<sup>3890</sup> RFJ-113:T.57-58(26-Sep-2017); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3891</sup> VASILJEVIĆAleksandar:T.16(31-Jan-2019).

<sup>3892</sup> [P02787](#), p.1-3.

<sup>3893</sup> [REDACTED].

<sup>3894</sup> MILOVANOVIĆManojlo:[P02934](#), T.4383-4385,4503,4505,4516-4517; [P00059](#), p.24.

<sup>3895</sup> MILOVANOVIĆManojlo:[P02934](#), T.4383-4386.

operations and crimes.<sup>3896</sup> **SIMATOVIĆ** had phone contact with **KARADŽIĆ** in 1991 and 1992<sup>3897</sup> and [REDACTED].<sup>3898</sup> He met in eastern BiH with the political and military leadership repeatedly in 1992 and 1993.<sup>3899</sup> During operations in 1994 to 1995, [REDACTED].<sup>3900</sup>

911. Moreover, the Accused established DB organs in Krajina, SBWS, and RS and embedded operatives and associates in key positions throughout these areas, all reporting directly to the Accused and ensuring that they were impeccably informed.<sup>3901</sup>

912. **SIMATOVIĆ**'s police expert witness testified that the SerbianDB was an effective, professional security organisation.<sup>3902</sup> Its reporting mechanisms were designed to ensure the Accused received high-quality information.<sup>3903</sup> Considering their roles in the SerbianDB intelligence apparatus, the Accused knew about the persecutory campaign targeting non-Serbs in Croatia and BiH. Their continued contribution to the implementation of the CCP shows they intended the crimes.

**3. STANIŠIĆ suggested to KARADŽIĆ that their goals could be achieved through “killings” and “extermination”**

913. **STANIŠIĆ** directly expressed his shared intent in conversations with fellow-JCE member **KARADŽIĆ**.

914. In his discussions with **KARADŽIĆ**, **STANIŠIĆ** signalled his readiness to use extreme violence against non-Serbs to achieve their shared goals for Serb-controlled territory. During an intercepted conversation with **KARADŽIĆ** on 22 January 1992, anticipating the likelihood of war in BiH,<sup>3904</sup> **STANIŠIĆ** expressed his willingness to resort to killings and extermination of non-Serbs if necessary:

<sup>3896</sup> Cross-reference Section [II.E.3\(a\)\(i\)](#); Section [II.F.1\(a\)\(i\)b](#); Section [II.F.1\(b\)\(i\)](#); Section [II.E.4\(a\)\(i\)](#).

<sup>3897</sup> [P02780](#); [P02793](#), p.3-7. See also [REDACTED].

<sup>3898</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3899</sup> Cross-reference Section [II.E.4\(d\)](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>3900</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3901</sup> Cross-reference Section [II.F.1\(b\)\(i\)b](#); Section [II.F.2\(b\)](#); Section [II.F.3\(b\)](#); Section [II.F.4\(a\)\(ii\)b.ii](#).

<sup>3902</sup> MILOŠEVIĆMilan:T.42-44(25-Feb-2020).

<sup>3903</sup> [REDACTED]; MILOŠEVIĆMilan:T.45(25-Feb-2020). See also MILOŠEVIĆMilan:[2D00451](#), para.201.

<sup>3903</sup> [REDACTED].

<sup>3904</sup> DONIARobert:T.60(2-Feb-2018); NIELSENChristian:T.30-31(21-Nov-2017); [REDACTED].

Speaker	Intercepted Conversation
<b>KARADŽIĆ:</b>	I then said to a man who's very close to TUDMAN that the Serbs and the Croats might resolve all their contentious issues in a month or two. With elasticity and goodwill they could settle their disagreement. Otherwise, they are in for thirty years of torture. With the Blue Helmets, with disagreements, with all sorts of things...
<b>STANIŠIĆ:</b>	With killings.
<b>KARADŽIĆ:</b>	I beg your pardon?
<b>STANIŠIĆ:</b>	With killings.
<b>KARADŽIĆ:</b>	Yes, yes.
<b>STANIŠIĆ:</b>	No. We'll then have to push them to go to Belgrade, you know!
<b>KARADŽIĆ:</b>	Really?
<b>STANIŠIĆ:</b>	There's nothing else left for us to do.
<b>KARADŽIĆ:</b>	Yes, yes.
<b>STANIŠIĆ:</b>	Or we'll exterminate them completely, so let's see where we'll end up.
<b>KARADŽIĆ:</b>	Yes, yes.
<b>STANIŠIĆ:</b>	No, if they want it, they'll have it. Then they'll have an all-out war.
<b>KARADŽIĆ:</b>	Yes, yes.
<b>STANIŠIĆ:</b>	Better do it like decent people. <sup>3905</sup>

915. By the time he uttered these words, **STANIŠIĆ** knew that Serb Forces had already murdered, persecuted, deported, and forcibly transferred non-Serbs in SAO-SBWS and SAO-Krajina, resulting in massive population displacements.<sup>3906</sup> Two months later, after “do[ing] it like decent people” failed to achieve the desired results, ARKAN arrived in Bijeljina—[REDACTED]<sup>3907</sup>—to begin the killings **STANIŠIĆ** had foreshadowed.<sup>3908</sup>

<sup>3905</sup> [P02790](#), p.6-7; [REDACTED]; [REDACTED]. See also [REDACTED]; [REDACTED]; SELAKOsmar:1D00559, T.17462; [REDACTED].

<sup>3906</sup> Cross-reference Section [IV.C.2](#).

<sup>3907</sup> Cross-reference Section [II.D.2\(b\)](#).

<sup>3908</sup> Cross-reference Section [II.F.4\(b\)\(i\)](#); Section [III.C.1](#).

**4. STANIŠIĆ and SIMATOVIĆ repeated the same pattern of contributions for over four years, knowing that this pattern resulted in crimes**

(a) The Accused's continuous support for ARKAN and the SDG reveals their shared intent

916. Both Accused supported the activities of ARKAN and the SDG, knowing that their horrific crimes were advancing the CCP.

917. ARKAN's notoriety as a violent criminal pre-dated the conflict, and grew as the conflict progressed.<sup>3909</sup> The Accused's association with him shows their criminal intent. A January 1991 SerbianDB report shows that the highest levels of the SerbianDB were well-informed about ARKAN's violent criminality prior to the Indictment period.<sup>3910</sup> [REDACTED].<sup>3911</sup> At least one SerbianDB asset was embedded in the SDG, [REDACTED].<sup>3912</sup> ARKAN's public statements supporting a nationalist agenda, promoting ethnic violence and inciting hatred against and fear of non-Serbs featured regularly in the media.<sup>3913</sup>

918. Aware of ARKAN's nature and activities, **STANIŠIĆ** and **SIMATOVIĆ** continuously used ARKAN and his SDG to pursue their goals from 1991, although they received regular updates on the group's crimes.<sup>3914</sup> The SerbianDB under **STANIŠIĆ**'s leadership took over ARKAN from the FederalDB knowing that he was an assassin and extremist,<sup>3915</sup> then protected him from measures that should have applied to curb the SDG's illegal activities under OA Tomson.<sup>3916</sup> Once the conflict was underway, the SerbianDB reported up the chain on ARKAN's and the SDG's crimes in SAO-SBWS, including the charged murders.<sup>3917</sup>

<sup>3909</sup> Cross-reference Section [II.C.5](#). E.g. STEVANOVIĆObrad:T.9(30-Sep-2020); GREKULOVIĆSrđan:[ID00410](#), T.15275; [REDACTED]; [REDACTED]; [P01960](#), p.72.

<sup>3910</sup> [P00020](#).

<sup>3911</sup> [REDACTED]; [REDACTED].

<sup>3912</sup> [REDACTED]; [REDACTED]; [REDACTED]; ANASTASIJEVIĆDejan:T.13(14-Jun-2018); ANASTASIJEVIĆDejan:T.40(21-Jun-2018).

<sup>3913</sup> [P03856](#), p.2; [REDACTED]; [P02430](#)(02:02:58-02:09:35); ANASTASIJEVICDejan:[P02423](#), para.146; [P00061](#); [REDACTED].

<sup>3914</sup> Cross-reference Section [IV.C.4](#); Section [II.D.2\(b\)](#); Section [II.F.2\(f\)\(i\)](#); Section [II.F.4\(b\)\(i\)](#); Section [II.F.5\(b\)](#). [REDACTED]; [REDACTED]. See Šainović AJ, para.1019.

<sup>3915</sup> Cross-reference Section [II.C.5](#); Section [II.D.2\(b\)\(i\)](#). SAVIĆBorivoje:T.68(12-Sep-2017).

<sup>3916</sup> Cross-reference Section [II.D.2\(b\)\(ii\)](#).

<sup>3917</sup> [P00593](#); [REDACTED]; [P01198](#), p.1-3. See also [REDACTED].



919. By December 1991, the SDG's involvement in "genocide, killing and other things" was known so widely that JCE member ADŽIĆ was concerned that this was "causing huge problems and damage to us"<sup>3918</sup>—bad publicity that interfered with JCE members' ability to pursue their CCP. Instead of cutting off support for ARKAN, **STANIŠIĆ** and **SIMATOVIĆ** facilitated ARKAN and the SDG's deployment to Bijeljina and then to Zvornik.<sup>3919</sup> SerbianDB reports on the SDG's activities in Bijeljina and Zvornik in 1992 reflected a continuation of the same criminal behaviours, again noting "genocide".<sup>3920</sup> Again, the Accused made no effort to sever institutional links with the SDG before their next engagement in Brčko.<sup>3921</sup>

920. As the conflict wore on and SDG crimes became more pervasive, the Accused continued to exercise direct control over ARKAN's activities and deployments. [REDACTED],<sup>3922</sup> [REDACTED].<sup>3923</sup>

921. Moreover, the Accused paid and provided health benefits to the SDG members during operations in which they committed extensive crimes.<sup>3924</sup> In 1995, [REDACTED] ARKAN to build a new SDG training centre for hundreds of recruits in Erdut.<sup>3925</sup>

922. After the SDG's massacres in Sanski Most, the Accused continued to support and deploy them until they disbanded. In the ultimate confirmation that the SDG's campaign of ethnically motivated murder, torture, looting and rape had met the Accused's expectations, the Accused then welcomed SDG members into the Unit and made LEGIJA<sub>(DB)</sub> its commander.<sup>3926</sup>

(b) The Accused's use of the Unit shows their shared intent

923. The circumstances of the Unit's establishment, recruitment, and consecutive secret deployments for ethnic cleansing operations demonstrate that the Accused intended the CCP. In addition, **SIMATOVIĆ**'s role in planning and/or commanding the

<sup>3918</sup> [P03387](#), p.3-4.

<sup>3919</sup> Cross-reference Section [II.D.2\(b\)\(iv\)](#).

<sup>3920</sup> [REDACTED]; NIELSENChristian:T.11(15-Nov-2017); [REDACTED]; [REDACTED].

<sup>3921</sup> NIELSENChristian:T.13(15-Nov-2017); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [P00852](#), p.14.

<sup>3922</sup> [REDACTED].

<sup>3923</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3924</sup> Cross-reference Section [II.D.2\(b\)\(v\)](#).

<sup>3925</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00842](#), p.2; [P02350](#), p.1.

<sup>3926</sup> Cross-reference Section [II.D.2\(b\)\(vi\)](#), [P00059](#), p.17.

Unit's early Krajina operations,<sup>3927</sup> Bosanski Šamac deployment, and Podrinje operation—during which the Unit committed crimes to drive out non-Serbs—further demonstrates the intent of both Accused.

924. The Accused's earliest personnel choices were indicative of their intentions for the Unit. First, they engaged Captain DRAGAN<sub>(DB)</sub> to assist them in establishing the Unit at Golubić, knowing from extensive surveillance that he was "advocating terrorism [REDACTED]."<sup>3928</sup> Then, the Accused recruited and retained known criminals in the Unit.<sup>3929</sup> The Accused ensured that even after the Unit was formalised as the JATD, it remained easy to bring criminals into the Unit's ranks by calling them "reserves".<sup>3930</sup>

925. Once formed, the Accused repeatedly deployed the Unit into operations in SAO-Krajina and SAO-SBWS to remove non-Serbs.<sup>3931</sup> Although the Accused knew that Unit members were committing crimes in successive operations from July through December 1991 in Glina,<sup>3932</sup> Lovinac,<sup>3933</sup> Saborsko,<sup>3934</sup> Bilje,<sup>3935</sup> and villages in Western Srem,<sup>3936</sup> they continued deploying them.<sup>3937</sup>

926. **SIMATOVIĆ's** personal involvement in planning the August and September 1991 attacks on the Croat village of Lovinac further reveals his shared intent. His armoured train was used in attacking Lovinac with the express purpose of intimidating and driving the population out.<sup>3938</sup> He used the attack for mortar target practice,

<sup>3927</sup> Cross-reference Section [II.F.1\(c\)\(ii\)](#); Section [III.B.1\(b\)](#).

<sup>3928</sup> [REDACTED]; [REDACTED]; [REDACTED]; [2D00015](#); [REDACTED]. See [2D00269](#).

<sup>3929</sup> [REDACTED]; [REDACTED]; [REDACTED]; RFJ-150:T.28(22-May-2018); RFJ-150:T.16(23-May-2018); [P01972](#), p.1-3; [P00234](#), p.32-33; [P02828](#), p.6,8; [P02856](#), p.1; [REDACTED]; [P02852](#), p.3,19,38; KRSMANOVIĆDragoslav:[1D00406](#), p.4; [P00540](#); [P02717](#), p.11; [P02841](#), p.4,5-6,9; [P00839](#); [P03406](#), p.2-4; [P03407](#); [P03417](#), p.1,2; [P03419](#); [P03330](#); [P03407](#), [P03417](#), p.2; [P03793](#); [1D00407](#), p.1,3,5; [P03792](#), p.1(Danilo BABIĆ was under **SIMATOVIĆ's** command); [P00830](#), p.8,10,21; [2D00143](#), p.3; KRSMANOVIĆDragoslav:T.26-27(2-Oct-2019); [REDACTED]; [REDACTED]; [P02600](#), p.10-11,17-20; [REDACTED]; KRSMANOVIĆDragoslav:T.9(25-Sep-2019); [P02712](#), p.1,11,12,14(p.14(BCS)); [P02834](#), p.3,12,16,29-33; [P02717](#); [REDACTED]; [P00500](#), p.3(see also p.1-2); [REDACTED]. See AnnexA(BANJAC<sub>(DB)</sub>; BAKLAJIĆ<sub>(DB)</sub>; [REDACTED]; Zvezdan JOVANOVIĆ<sub>(DB)</sub>; Budimir ZEČEVIĆ<sub>(DB)</sub>). See also [2D00089](#), p.2,10.

<sup>3930</sup> Cross-reference Section [II.D.2\(a\)\(vi\)b](#).

<sup>3931</sup> Cross-reference Section [III.B.1-2](#); Section [II.D.2](#).

<sup>3932</sup> Cross-reference Section [II.F.1\(c\)\(ii\)a](#); Section [III.B.1\(b\)\(i\)](#).

<sup>3933</sup> Cross-reference Section [II.F.1\(c\)\(ii\)c](#); Section [III.B.1\(b\)\(iii\)](#). See [REDACTED]; [REDACTED]; BABIĆMilan:[P01248](#), T.1432-1433. AF174.

<sup>3934</sup> Cross-reference Section [III.B.1\(c\)\(iii\)](#).

<sup>3935</sup> Cross-reference Section [II.F.2](#); Section [III.B.2\(b\)\(ii\)](#).

<sup>3936</sup> Cross-reference Section [II.F.2\(h\)\(iii\)](#); Section [III.B.2\(b\)\(iv\)](#).

<sup>3937</sup> Cross-reference Section [II.D.2\(a\)](#).

<sup>3938</sup> [REDACTED].

repeatedly shelling the village and boasting that it counted as a hit.<sup>3939</sup> Under his command, the village was set on fire.<sup>3940</sup> When the population fled he bragged that he had razed the village.<sup>3941</sup> Similarly, **SIMATOVIĆ**'s role commanding the Unit in the Glina operation, during which the Unit fired on and destroyed the church, school, and houses, is indicative of **SIMATOVIĆ**'s shared intent.<sup>3942</sup>

927. With full awareness of the Unit's involvement in expelling non-Serbs from the SAOs in Croatia, **SIMATOVIĆ** displayed his intent by personally deploying the Unit into Bosanski Šamac in April 1992,<sup>3943</sup> where they again terrorised and expelled non-Serb civilians.<sup>3944</sup> As further evidence of the Accused's intent, they selected CRNI<sub>(DB)</sub> to lead the Bosanski Šamac operation knowing he had been involved in Bapska,<sup>3945</sup> an operation that contributed to removing the non-Serb population from Western Srem in SAO-SBWS.<sup>3946</sup> **SIMATOVIĆ** knew exactly who CRNI<sub>(DB)</sub> was and what he was capable of.<sup>3947</sup>

928. Knowing of their Unit's crimes in Bosanski Šamac,<sup>3948</sup> the Accused intervened to ensure that its members avoided punishment. After the Unit massacred non-Serb detainees in the Crkvina warehouse,<sup>3949</sup> **SIMATOVIĆ** rebuffed the Bosanski Šamac leadership's request to remove CRNI<sub>(DB)</sub> from the municipality because of his criminal activities.<sup>3950</sup> Angry when the VRS subsequently arrested CRNI<sub>(DB)</sub>, **STANIŠIĆ** demanded his release.<sup>3951</sup> Once released, the Accused sent him back to Bosanski Šamac for further operations.<sup>3952</sup> This intervention and re-deployment further demonstrates their shared intent.

<sup>3939</sup> BABIĆMilan:[P01248](#), T.1431-1433,1603-1604.

<sup>3940</sup> BABIĆMilan:[P01246](#), T.14096.

<sup>3941</sup> BABIĆMilan:[P01248](#), T.1431-1433,1603-1604. *See also* BABIĆMilan:[P01246](#), T.14095-14096; [REDACTED]; [P02886](#), p.84.

<sup>3942</sup> [P01985](#), p.1-2; [P01986](#), p.1-2; [P03230](#), p.1; [P03235](#); [1D00032](#); [1D00047](#), p.1-2.

<sup>3943</sup> [REDACTED]; [REDACTED]; [REDACTED]; RFJ-035:T.47-48(18-Apr-2018); [REDACTED].

<sup>3944</sup> *Cross-reference* Section [III.C.3](#); Section [II.F.4\(b\)\(ii\)a](#).

<sup>3945</sup> [P00845](#), p.7,10.

<sup>3946</sup> *Cross-reference* Section [III.B.2\(b\)\(iv\)](#); Section [II.F.2\(h\)\(iii\)](#).

<sup>3947</sup> [REDACTED].

<sup>3948</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P01988](#); [P01989](#); [P03142](#), p.1. [P01988](#), [P01989](#), and [P03142](#) are reports of the *Tajfun* intelligence group, which reported to the SerbianDB: *cross-reference* Section [II.F.4\(a\)\(ii\)b.ii](#).

<sup>3949</sup> *Cross-reference* Section [III.C.3\(c\)](#).

<sup>3950</sup> [REDACTED]; [REDACTED].

<sup>3951</sup> [REDACTED]; [REDACTED].

<sup>3952</sup> [P01988](#); [P01989](#); [P00846](#), p.3; [P01953](#), p.2,7; [P01919](#), p.2.

929. The Accused again demonstrated their intent and approval for the Unit's crimes by deploying CRNI<sub>(DB)</sub>'s unit along the Posavina Corridor to Brčko after they ethnically cleansed Bosanski Šamac.<sup>3953</sup> Predictably, they continued "their official role as war criminals in the area" under Živojin IVANOVIĆ<sub>(DB)</sub>.<sup>3954</sup> [REDACTED],<sup>3955</sup> [REDACTED].<sup>3956</sup> [REDACTED].<sup>3957</sup> Rather than removing IVANOVIĆ<sub>(DB)</sub>, the Accused continued to deploy IVANOVIĆ<sub>(DB)</sub> as one of the Unit's main commanders, demonstrating their intent for his crimes.<sup>3958</sup>

930. While CRNI<sub>(DB)</sub>'s unit was still in Bosanski Šamac, the Accused deployed another Unit group under BOŽOVIĆ<sub>(DB)</sub> into Doboj.<sup>3959</sup> Knowing BOŽOVIĆ<sub>(DB)</sub> led units in committing heinous crimes against Doboj's non-Serb population,<sup>3960</sup> the Accused showed their approval and criminal intent by continuing to redeploy the Unit under BOŽOVIĆ<sub>(DB)</sub>, throughout the Indictment period—to Teslić immediately after Doboj, where BOŽOVIĆ<sub>(DB)</sub> led the Unit in the same types of crimes;<sup>3961</sup> into scorched-earth operations in eastern BiH a few months later, where he burned down Muslim villages;<sup>3962</sup> into Operation Pauk where he presided over detentions;<sup>3963</sup> into Sanski Most in September-October 1995 where he coordinated units that included the SDG;<sup>3964</sup> and finally into the Eastern Slavonia operations at the end of 1995.<sup>3965</sup>

931. **SIMATOVIĆ** also showed his shared intent when he participated along with MLADIĆ and other military commanders in planning Operation Udar,<sup>3966</sup> the goal of which was to drive the Muslim civilian population out of eastern BiH consistent with the

<sup>3953</sup> [P02045](#), p.3; [REDACTED]; [REDACTED]; [REDACTED]; RFJ-035:T.5-6(18-Apr-2018).

<sup>3954</sup> [REDACTED]; [2D00089](#), p.2,10; [REDACTED].

<sup>3955</sup> [REDACTED]; [REDACTED]; [1D00067](#), p.7-8,10.

<sup>3956</sup> [REDACTED]; [REDACTED].

<sup>3957</sup> [REDACTED]. [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>3958</sup> *Cross-reference* AnnexA.

<sup>3959</sup> *Cross-reference* Section [II.F.4\(b\)\(ii\)c](#); Section [II.D.2\(a\)\(iii\)](#).

<sup>3960</sup> [P03178](#); [P01713](#); [P03490](#); [P02378](#) (from context, it is clear that "Centre" is the SerbianDB centre responsible for corresponding with MILOŠ, and the format of this document is consistent with other Miloš reports: see Section [II.F.4\(a\)\(ii\)b.ii](#)). See [P02374](#), p.4. See also [P03500](#). *Cross-reference* Section [III.C.4](#); Section [II.D.2\(a\)](#).

<sup>3961</sup> *Cross-reference* Section [II.F.4\(b\)\(ii\)c](#).

<sup>3962</sup> *Cross-reference* Section [II.F.4\(b\)\(iv\)](#).

<sup>3963</sup> *Cross-reference* AnnexA.

<sup>3964</sup> *Cross-reference* Section [II.F.5\(b\)\(iv\)](#).

<sup>3965</sup> *Cross-reference* Section [II.F.5\(b\)\(v\)](#).

<sup>3966</sup> [P01943](#), p.137; [REDACTED].

Third Strategic Goal.<sup>3967</sup> He commanded the Unit, which expelled or killed Muslim inhabitants and burned their villages to the ground.<sup>3968</sup>

932. **SIMATOVIĆ**'s involvement in planning and commanding the Unit in these criminal operations is also evidence of **STANIŠIĆ**'s intent for the CCP. **SIMATOVIĆ** owed his significant role in these operations to **STANIŠIĆ**, his superior in the SerbianDB and in **MILOŠEVIĆ**'s informal lines of authority.<sup>3969</sup> There is no indication that **STANIŠIĆ** ever disciplined **SIMATOVIĆ** for his direct role in these expulsion campaigns; on the contrary, his career only advanced during the Indictment period.<sup>3970</sup>

933. **STANIŠIĆ** and **SIMATOVIĆ**'s pattern of deploying the Unit they created and controlled into ethnic cleansing operations and protecting them from repercussions proves that they intended the Unit's crimes, which advanced the CCP.

(c) The Accused's repeated deployment of the Scorpions reveals their shared intent

934. The Accused's repeated deployment of the Scorpions, while knowing of their criminal conduct, reveals their intent. Both Accused were on the ground at the command post during Operation Pauk when the Scorpions violently abused Muslim detainees.<sup>3971</sup> Confirming their approval for the Scorpions' actions, the Accused deployed them again shortly thereafter into the Trnovo/Treskavica operation, coordinated by Unit member **MIJOVIĆ**<sub>(DB)</sub>, where they filmed themselves murdering Srebrenica Muslims.<sup>3972</sup>

935. The Accused must have sanctioned these murders, and must have been informed once they were complete. **BOCA**<sub>(DB)</sub> received the order to provide vehicles to Srebrenica through "his chain of command", which led up to **SIMATOVIĆ** and **STANIŠIĆ**.<sup>3973</sup> **MIJOVIĆ**<sub>(DB)</sub> was coordinating the Scorpions' activities on the ground, **BOCA**<sub>(DB)</sub> was their commander, **MRGUD**<sub>(DB)</sub> was their handler and **KOJIĆ**<sub>(DB)</sub> was involved in their

<sup>3967</sup> [REDACTED]; [REDACTED]; [P01591](#).

<sup>3968</sup> [REDACTED].

<sup>3969</sup> Cross-reference Section [II.E.1](#); Section [II.B.2](#). [REDACTED]; [REDACTED]; **BABIĆ**Milan:[P01246](#), T.13181,13524,13650-13651; **BABIĆ**Milan:[P01248](#), T.1428-1429; [REDACTED]; **CVETKOVIĆ**Vojislav:T.18(1-Sep-2020); [REDACTED]; [REDACTED].

<sup>3970</sup> [P00831](#).

<sup>3971</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3972</sup> Cross-reference Section [III.C.5](#); Section [II.F.5\(b\)\(iii\)](#).

<sup>3973</sup> See AF1238; [REDACTED]. Cross-reference Section [II.D.2\(c\)](#).

deployment—all four of whom reported directly to the Accused.<sup>3974</sup> The Accused had always been well-informed about the situation around the BiH eastern enclaves<sup>3975</sup> (and STANIŠIĆ had just met with KARADŽIĆ about this around 9 July 1995);<sup>3976</sup> they had Unit members on the ground in the area during the same period<sup>3977</sup>—including MIJOVIĆ<sub>(DB)</sub>, who left the Trnovo front to seek out MLADIĆ in Bratunac just when the campaign to exterminate Srebrenica’s Muslim men and boys was starting.<sup>3978</sup> In light of their information about the events on the ground, the Accused knew that the Scorpions murdered the Srebrenica Muslims.<sup>3979</sup>

936. Upon return to the RSK from Trnovo, the Scorpions disseminated copies of the video and even made it available for rent at a local video store.<sup>3980</sup> Although SIMATOVIĆ [REDACTED],<sup>3981</sup> he did not punish them. Rather, the Accused deployed them into operations in SBWS, again alongside the SDG and the Unit, again revealing their intent for the CCP.<sup>3982</sup> After the conflict the Accused welcomed Scorpions who had participated in Trnovo into the Unit, the ultimate stamp of approval for their wartime activities.<sup>3983</sup>

**5. STANIŠIĆ and SIMATOVIĆ supported their co-JCE members’ activities despite knowledge of their criminal intent**

937. STANIŠIĆ and SIMATOVIĆ further demonstrated their shared intent by supporting co-JCE members who were expressly pursuing extremist policies and criminal goals, and were using forces under their control to persecute, forcibly displace, and murder non-Serbs.

<sup>3974</sup> Cross-reference Section [II.D.1\(b\)](#); Section [II.D.2\(c\)](#); [P02350](#); [REDACTED]; [REDACTED]; SAVIĆBorivoje:T.65-66(12-Sep-2017); STOPARIĆGoran:[P00796](#), para.77; [REDACTED]; [P02553](#); [REDACTED]; [REDACTED].

<sup>3975</sup> MILOVANOVIĆManojlo:[P02934](#), T.4383-4384. Cross-reference Section [II.F.4\(b\)\(iv\)](#).

<sup>3976</sup> DERONJIĆMiroslav:[P01717](#), para.172-175; DERONJIĆMiroslav:[P01719](#), T.29635,29668-29670.

<sup>3977</sup> [P00855](#), p.2-3; [P00256](#).

<sup>3978</sup> DERONJIĆMiroslav:[P01717](#), para.207.

<sup>3979</sup> [REDACTED].

<sup>3980</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>3981</sup> [REDACTED].

<sup>3982</sup> Cross-reference Section [II.F.5\(b\)\(v\)](#); Section [II.D.2\(c\)](#).

<sup>3983</sup> E.g. [REDACTED]. Cross-reference Section [II.D.2\(c\)](#).

(a) MILOŠEVIĆ

938. MILOŠEVIĆ was at the apex of the JCE membership, intending and enabling massive crimes to achieve the goal of establishing ethnic Serb territories in Croatia and BiH.<sup>3984</sup> He made his intentions clear to the Serb leaders with whom he collaborated at various points throughout the Indictment period.<sup>3985</sup> Considering their high level positions within MILOŠEVIĆ's SerbianDB, there is no possibility that STANIŠIĆ or SIMATOVIĆ were oblivious to MILOŠEVIĆ's intentions and objectives. Yet they both worked tirelessly to support MILOŠEVIĆ's aims throughout the Indictment period, showing that they intended the resulting crimes.

939. From 1991-1995, STANIŠIĆ was considered MILOŠEVIĆ's right-hand man: STANIŠIĆ had played an important role in bringing MILOŠEVIĆ to power,<sup>3986</sup> and for the duration of the Yugoslav conflict he remained the man who MILOŠEVIĆ could count on to carry out his plans,<sup>3987</sup> "who knew literally where the bodies were buried".<sup>3988</sup> He ensured that the SerbianDB served MILOŠEVIĆ's aims (a fact he stated publicly),<sup>3989</sup> and would not have held his position had he not "enjoyed [MILOŠEVIĆ's] great confidence".<sup>3990</sup> Defence witness ROBERTS observed that MILOŠEVIĆ summarily discarded those who had "outlived their usefulness" or whose "loyalty was suspect";<sup>3991</sup> yet STANIŠIĆ remained close to MILOŠEVIĆ, continuously carrying out his directions and policies throughout the ethnic cleansing campaigns. For example:

- After MILOŠEVIĆ ordered that new formations be created to defend "the interests of the Serbian people outside Serbia" in March 1991,<sup>3992</sup> STANIŠIĆ and SIMATOVIĆ ensured this happened, quickly establishing the Unit and training Krajina forces at Golubić,<sup>3993</sup> which were instrumental in the ethnic cleansing

<sup>3984</sup> Cross-reference Section II.A; Section II.C.1; Section II.E.

<sup>3985</sup> Cross-reference Section II.A; Section II.C.1.

<sup>3986</sup> [REDACTED]; ANASTASIJEVIĆDejan:T.19-21(14-Jun-2018).

<sup>3987</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.40-41; [REDACTED]; ID01346, p.2; [REDACTED]; P02435; P02433, p.4; ID00123, p.1-3; [REDACTED]. See also e.g. [REDACTED]; [REDACTED]; ID00057, p.42,209; ID00037, p.93; P02939,p.1.

<sup>3988</sup> ROBERTSIvor:ID00430, para.135; ROBERTSIvor:T.17-18(15-Oct-2019); ID00432, p.52.

<sup>3989</sup> P02433, p.1.

<sup>3990</sup> [REDACTED].

<sup>3991</sup> ROBERTSIvor:ID00430, para.45,47; ROBERTSIvor:T.13-14(15-Oct-2019). See also ANASTASIJEVIĆDejan:T.31(13-Jun-2018).

<sup>3992</sup> P02439.

<sup>3993</sup> Cross-reference Section II.D.2(a)(i); Section II.E.4(a)(i); Section II.F.1(b)(ii); Section IV.B.



campaign beginning in the summer of 1991.<sup>3994</sup> **STANIŠIĆ** and **SIMATOVIĆ** told their Unit repeatedly that they had **MILOŠEVIĆ**'s full support for their activities.<sup>3995</sup>

- With **MILOŠEVIĆ**'s blessing,<sup>3996</sup> **STANIŠIĆ** funnelled arms to Serbs in Croatia and BiH, continuing after it became clear that the arms were being used to target and displace non-Serbs.<sup>3997</sup>
- When **MILOŠEVIĆ** needed to convince **BABIĆ** to accept the Vance Plan to provide cover for the Krajina Serbs' continued land-grabs, **STANIŠIĆ** met with **BABIĆ** repeatedly to apply the necessary pressure.<sup>3998</sup> When **BABIĆ** failed to acquiesce, **STANIŠIĆ** joined **MILOŠEVIĆ** in ensuring that **BABIĆ** was removed.<sup>3999</sup>
- **STANIŠIĆ** took measures to keep **MILOŠEVIĆ** in power even as he presided over the forced displacement of thousands of non-Serbs, protecting **MILOŠEVIĆ** against political threats by, for example, insisting that **MARTIĆ** send his RSK police force to Belgrade during the political protests in March 1992<sup>4000</sup> and targeting the SRS and **ŠEŠELJ** after they became a political threat to **MILOŠEVIĆ** in late 1993.<sup>4001</sup>
- **STANIŠIĆ** led the consolidation of **MILOŠEVIĆ**'s authority over the federal security and police structures, including the military intelligence structure and the

<sup>3994</sup> Cross-reference Section [II.F.1\(c\)\(ii\)-\(iii\)](#); Section [III.B.](#)

<sup>3995</sup> See [REDACTED]; [REDACTED]; [REDACTED]; RFJ-150:T.11-12(22-May-2018); RFJ-150:T.63-64(23-May-2018); RFJ-150:T.2-3(24-May-2018).

<sup>3996</sup> [1D00042](#), p.2,3; [REDACTED]; [P01446](#), p.3; [REDACTED]; [REDACTED]; **BABIĆ**Milan:[P01246](#), T.13147; [REDACTED]. Cross-reference Section [II.E.3.](#)

<sup>3997</sup> Cross-reference Section [II.E.3.](#) See eg. [REDACTED]; [P02890](#), p.233-234; **DONIA**Robert:T.65-66(2-Feb-2018).

<sup>3998</sup> Cross-reference Section [II.F.3\(a\)](#).

<sup>3999</sup> Cross-reference Section [II.F.3\(a\)](#).

<sup>4000</sup> [REDACTED]; RFJ-066:T.39-40,46-51(11-Jul-2017); [REDACTED]; [P03768](#); **BOSNIĆ**Mile:T.48-50(21-Aug-2019); [2D00498](#); [P03051](#), p.2. See also [1D00061](#), p.19-20,31; [REDACTED].

<sup>4001</sup> [P02433](#), p.5; **THEUNENS**Reynaud:T.28-29(8-Mar-2018); **THEUNENS**Reynaud:[P01980](#), p.140,152; [REDACTED]; [P00004](#), p.13; [1D01372](#), p.5. See [REDACTED]; [P02429](#); **ANASTASIJEVIĆ**Dejan:[P02423](#), para.142,148-149; **ANASTASIJEVIĆ**Dejan:T.62(19-Jun-2018). See also [REDACTED]; [P03738](#); [1D00978](#), p.3-4; [REDACTED]; [P03227](#); [1D00383](#); [REDACTED]; [REDACTED]; [REDACTED].

FSUP<sup>4002</sup>—even as Federal President Milan PANIĆ was expressing concerns about MILOŠEVIĆ’s complicity in ethnic cleansing.<sup>4003</sup>

940. **SIMATOVIĆ** was not as personally close to MILOŠEVIĆ as his superior, **STANIŠIĆ**, but MILOŠEVIĆ knew him by name and endorsed his work: in August 1991, after **SIMATOVIĆ** had coordinated the Unit and SAO-Krajina police in several criminal attacks,<sup>4004</sup> MILOŠEVIĆ “advocated, requested and demanded” that **SIMATOVIĆ** “should be in Krajina because he’s a good man”.<sup>4005</sup> This shows MILOŠEVIĆ’s trust that **SIMATOVIĆ** shared his criminal goals.

(b) BOGDANOVIĆ, KERTES, and BADŽA

941. The Accused collaborated with BOGDANOVIĆ, KERTES and BADŽA, who themselves possessed intent to commit the charged crimes to remove non-Serbs. BOGDANOVIĆ was involved in establishing and guaranteeing impunity for ARKAN’s SDG,<sup>4006</sup> and was part of a “parallel state security” through which he procured weapons from Serbia.<sup>4007</sup> During this period, **STANIŠIĆ** was working closely with BOGDANOVIĆ to arm Serbs in Croatia and BiH<sup>4008</sup> and to support the SDG,<sup>4009</sup> knowing ARKAN was also involved in this endeavour.<sup>4010</sup>

942. KERTES was a vital JCE member<sup>4011</sup> who played a critical role in arming Serbs,<sup>4012</sup> and he was explicit that the purpose of the arming was to establish territory that was “pure Serbian”.<sup>4013</sup> **STANIŠIĆ** worked with KERTES to finance and arm Serb Forces in Croatia and BiH, demonstrating they shared the CCP.<sup>4014</sup>

<sup>4002</sup> Cross-reference Section [II.E.1\(c\)](#).

<sup>4003</sup> DONIARobert:[P01599](#), p.33; DONIARobert:T.52-54,58-59(30-Jan-2018); [P02428](#); ANASTASIJEVIĆDejan:[P02423](#), para.141.

<sup>4004</sup> Cross-reference Section [II.F.1\(c\)\(ii\)](#); Section [III.B.1\(b\)](#); Section [IV.B.](#)

<sup>4005</sup> BABIĆMilan:[P01246](#), T.13181.

<sup>4006</sup> See ANASTASIJEVIĆDejan:T.51-52,58-59(14-Jun-2018); [REDACTED]; [REDACTED]; [REDACTED]. Cross-reference Section [II.D.2\(b\)\(i\)-\(ii\)](#).

<sup>4007</sup> [REDACTED]; [REDACTED]; [REDACTED]. See RFJ-066:T.34-35(24-Aug-2017).

<sup>4008</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; RFJ-066:T.11(13-Jul-2017); BABIĆMilan:[P01246](#), T.13505-13508; [P01734](#), p.26,40-41.

<sup>4009</sup> Cross-reference Section [II.D.2\(b\)\(i\)-\(ii\)](#).

<sup>4010</sup> Cross-reference Section [II.E.3\(a\)\(iv\)a](#).

<sup>4011</sup> [REDACTED]; NIELSENChristian:T.48(16-Nov-2017).

<sup>4012</sup> VASILJEVIĆAleksandar:T.2-3(30-Jan-2019); [REDACTED]; [REDACTED]; [P00485](#), p.6-7.

<sup>4013</sup> DERONJIĆMiroslav:[P01717](#), para.17; DERONJIĆMirlosav:[P01718](#), T.951-952,960-961,1198-1199.

<sup>4014</sup> [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.81; [REDACTED]; BABIĆMilan:[P01246](#), T.13503-13504; [P00482](#), p.1; DERONJIĆMiroslav:[P01718](#), T.957; [1D00042](#), p.2; [REDACTED].

943. **STANIŠIĆ** coordinated closely with SAO-SBWS TO Commander BADŽA while he was overseeing the CCP's implementation in SAO-SBWS in 1991, demonstrating shared intent.<sup>4015</sup> BADŽA was responsible for the activities of the armed groups in SAO-SBWS, the SMUP official directly overseeing ARKAN in SAO-SBWS in 1991, and **STANIŠIĆ** and BADŽA worked in tandem to guarantee ARKAN's impunity.<sup>4016</sup>

(c) MARTIĆ

944. From 1990, both Accused continuously directed and supported MARTIĆ,<sup>4017</sup> knowing that MARTIĆ held extremist views and publicly propagated a climate of fear and ethnic division.<sup>4018</sup> Their support never wavered, even as MARTIĆ personally participated in expelling Krajina's non-Serbs.<sup>4019</sup> **STANIŠIĆ**'s authority over MARTIĆ, particularly in 1991, was such that MARTIĆ could not have repeatedly organised and commanded the Krajina forces deployed into displacement operations without **STANIŠIĆ**'s approval.<sup>4020</sup> In the midst of the expulsion campaign, when MARTIĆ was arrested in September 1991 for *inter alia* committing crimes targeting non-Serb civilians, **STANIŠIĆ** sent a helicopter to secure his release.<sup>4021</sup>

945. As **STANIŠIĆ**'s man on the ground in Krajina,<sup>4022</sup> **SIMATOVIĆ** shared MARTIĆ's intent: they planned and executed attacks together from July 1991, and freely discussed their goal of removing the local Croat population to establish a purely Serb territory.<sup>4023</sup>

<sup>4015</sup> Cross-reference Section [II.F.2\(e\)\(i\)](#).

<sup>4016</sup> Cross-reference Section [II.F.2\(f\)\(i\)](#); Section [II.D.2\(b\)\(i\)](#)-(ii). SAVIĆBorivoje:T.64-65(13-Sep-2017); [REDACTED]; RFJ-111:T.45-51(15-Jun-2017); [REDACTED]; [REDACTED]; KARANMladen:T.13-14(28-Jan-2020); KARANMladen:T.44-45,52-53(29-Jan-2020); VASILJEVIĆAleksandar:T.34-35(5-Feb-2019); NOVAKOVIĆStojan:T.22-24(6-Oct-2020); [REDACTED]; NIELSENChristian:T.18,21-22(23-Nov-2017); STEVANOVIĆObad:T.6-7(30-Sep-2020).

<sup>4017</sup> Cross-reference Section [II.F.1](#); Section [II.F.3\(b\)](#); Section [II.F.5\(a\)](#). [REDACTED].

<sup>4018</sup> Cross-reference Section [II.C.8](#); Section [IV.C.2](#); Section [II.B.3\(c\)](#); Section [II.F.1\(a\)](#)-(b).

<sup>4019</sup> [REDACTED]; [REDACTED]. Cross-reference Section [II.F.1](#); Section [III.B.1](#).

<sup>4020</sup> Cross-reference Section [II.C.8](#); Section [II.E.3\(a\)](#); Section [II.F.1\(b\)\(i\)b](#). See [REDACTED].

<sup>4021</sup> BABIĆMilan:[P01246](#), T.13267-13269,13278-13280,13298-13302,13309-13312,13314-13318; BABIĆMilan:[P01248](#), T.1621-1634; BABIĆMilan:[P01243](#), p.43-44; [P01388](#); [P01463](#), p.1; VASILJEVIĆAleksandar:[P02695](#); [REDACTED].

<sup>4022</sup> Cross-reference Section [II.B.2](#).

<sup>4023</sup> [REDACTED]; [REDACTED]; [REDACTED]. Cross-reference Section [II.F.1](#).

(d) BABIĆ

946. BABIĆ's radical Serb nationalism was well-known to the Accused from as early as 1990.<sup>4024</sup> Nevertheless, they supported BABIĆ's activities in pursuit of ethnic separation—arming Krajina Serbs and establishing Serb parallel government, MUP, and TO structures in SAO-Krajina.<sup>4025</sup>

(e) HADŽIĆ

947. HADŽIĆ's personal involvement with ARKAN in murdering non-Serbs detained in Dalj was reported up the chain in the SerbianDB and was widely known in SAO-SBWS.<sup>4026</sup> Despite HADŽIĆ's complicity in these murders, STANIŠIĆ and MILOŠEVIĆ facilitated his elevation to RSK President by removing BABIĆ when BABIĆ refused to agree to the Vance Plan.<sup>4027</sup> [REDACTED].<sup>4028</sup>

(f) ŠEŠELJ

948. The Accused knew<sup>4029</sup> that Vojislav ŠEŠELJ was an extremist who publicly and relentlessly stoked fear and hatred of non-Serbs,<sup>4030</sup> and promoted the violent creation of a homogeneous "Greater Serbia".<sup>4031</sup> In May 1991, ŠEŠELJ expressly told SerbianDB personnel that his statements were meant to "frighten[] the Croats".<sup>4032</sup> ŠEŠELJ's public declarations "had an intoxicating effect" on volunteers,<sup>4033</sup> and STANIŠIĆ and SIMATOVIĆ partnered with him to train, organise, and arm volunteers integrated into Serb Forces for ethnic cleansing campaigns.<sup>4034</sup>

<sup>4024</sup> [REDACTED]; [REDACTED]; [REDACTED]; [P00155](#), p.58; BABIĆMilan:[P01243](#), p.12,13,19; BABIĆMilan:[P01560](#), para.10; [REDACTED]; BOSNIĆMile:T.67-68(22-Aug-2019). *See also* [P01571](#); [P01269](#), p.1-3.

<sup>4025</sup> *Cross-reference* Section [II.F.1\(a\)](#)-(b); Section [II.E.3\(a\)\(i\)](#)-(iii),(iv)a.

<sup>4026</sup> [P00593](#); [P01198](#); [REDACTED]; [REDACTED]; [REDACTED]. *See* [REDACTED].

<sup>4027</sup> *Cross-reference* Section [II.F.3\(a\)](#).

<sup>4028</sup> *Cross-reference* Section [II.F.2\(h\)\(i\)](#); Section [III.B.2\(c\)\(i\)a](#).

<sup>4029</sup> [P03185](#). *See also* [P03183](#), p.13-14.

<sup>4030</sup> *Cross-reference* Section [II.C.7](#).

<sup>4031</sup> *Cross-reference* Section [II.C.7](#).

<sup>4032</sup> [P03037](#), p.2 .

<sup>4033</sup> STOPARIĆGoran:[P00796](#), para.6,40-41; [REDACTED]. *See* [REDACTED]; [REDACTED].

<sup>4034</sup> [P00004](#), p.15-17; [REDACTED]; ANASTASIJEVIĆDejan:[P02423](#), para.95,150,156-157; [P00794](#), p.1-2; RFJ-017:T.15-16(31-Jan-2019); THEUNENSReynaud:[P01980](#), p.156,167-168,185,258; [REDACTED]; [REDACTED]; [REDACTED]; [P01938](#), p.256-257; [P02040](#), p.1; [P00846](#), p.3; [P03187](#), p.1; [P01083](#), p.4. *Cross-reference* Section [III.B.2](#); Section [III.C](#),1-3.

949. These volunteers' brutality against non-Serbs was widely known.<sup>4035</sup> The Accused's criminal intent therefore was clear when they incorporated ŠEŠELJ's volunteers into their plans to take the war into BiH. They worked with ŠEŠELJ to organise their deployment into, *inter alia*, Zvornik,<sup>4036</sup> Bosanski Šamac (as part of the Unit),<sup>4037</sup> and the 1993 eastern BiH operations,<sup>4038</sup> where they were instrumental in expelling non-Serbs.<sup>4039</sup>

(g) MLADIĆ

950. With full knowledge of MLADIĆ's role in commanding the JNA operations in SAO-Krajina that expelled thousands of non-Serbs,<sup>4040</sup> the Accused repeatedly deployed their SerbianDB units into expulsion campaigns in BiH alongside or re-subordinated to MLADIĆ's VRS, including in the 1993 scorched-earth operations in the Podrinje region, pursuant to MLADIĆ's Directive 4.<sup>4041</sup> On the heels of these operations, STANIŠIĆ proposed measures to assist the VRS to ensure that MLADIĆ could achieve their shared goals—first and foremost of which was ethnic separation.<sup>4042</sup> In July 1995, when MLADIĆ led Serb Forces in attacking the Muslim enclaves of Srebrenica and Žepa—to finish the job they had started with the Accused's assistance in 1993—the Scorpions, operating under the Accused's authority, provided buses to remove Muslims from Srebrenica and participated in the executions.<sup>4043</sup> The VRS-led executions in Srebrenica did not deter the Accused from deploying their Unit members and ARKAN's SDG into VRS operations around Sanski Most a few months later, further signaling the Accused's shared intent.<sup>4044</sup>

<sup>4035</sup> *E.g.* [REDACTED]; [P03747](#); THEUNENSReynaud:[P01980](#), p.21,25,248,284,432; NIELSENChristian:[P00850](#), p.11; [REDACTED]; [P01853](#), p.6; [P00347](#); [REDACTED]; DERONJIĆMiroslav:[P01719](#), T.29627; BOGUNOVIĆBorislav:[P02719](#), para.24.

<sup>4036</sup> [P00004](#), p.25,29; ANASTASIJEVIĆDejan:[P02423](#), para.156-157; [REDACTED].

<sup>4037</sup> [REDACTED]; [REDACTED]; [REDACTED]; RFJ-035:T.47-48(18-Apr-2018).

<sup>4038</sup> [1D00102](#), p.12-19; [1D00123](#), p.1-2. *See* [REDACTED]; [REDACTED]. [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>4039</sup> *Cross-reference* Section [III.C.2\(a\)](#); Section [III.C.3](#); Section [II.F.4\(b\)\(iv\)](#).

<sup>4040</sup> *Cross-reference* Section [II.C.11](#); Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(c\)](#).

<sup>4041</sup> *Cross-reference* Section [II.F.4\(b\)\(iv\)](#).

<sup>4042</sup> [P02890](#), p.242-243; MILOVANOVIĆManoljo:[P02935](#), T.15442-15443,15445-15446; [1D00036](#), p.53,60; DONIARobert:T.70(2-Feb-2018).

<sup>4043</sup> *Cross-reference* Section [II.F.5\(b\)\(iii\)](#); Section [III.C.5](#).

<sup>4044</sup> *Cross-reference* Section [II.F.5\(b\)\(iv\)](#).

(h) Mičo STANIŠIĆ

951. Under M.STANIŠIĆ, the RS-MUP was created to be a militarised police force.<sup>4045</sup> Like MARTIĆ's police, M.STANIŠIĆ's RS-MUP police forces were key perpetrators in expulsion campaigns from the very beginning, targeting non-Serb civilians in takeover crimes, rounding up non-Serbs *en masse*, and turning their police stations into detention centres where the RS-MUP police and others brutalised, raped, and killed non-Serbs.<sup>4046</sup> The Accused coordinated closely with municipal Serb police commanders for the SDG's and Unit's 1992 deployments in Bijeljina, Zvornik, and Bosanski Šamac, and in Doboj, the Accused even placed the Unit under the auspices of the RS-MUP's CSB.<sup>4047</sup> **STANIŠIĆ** and **SIMATOVIĆ**'s alliance with M.STANIŠIĆ and the RS-MUP, and the close coordination of the Accused's Unit and M.STANIŠIĆ's RS-MUP forces in committing the crimes, demonstrate that the Accused intended these forces' crimes. [REDACTED],<sup>4048</sup> the RS-MUP police forces' continuous involvement in crimes, often alongside the Accused's SerbianDB units, reveals that **STANIŠIĆ** intended those crimes.

(i) KARADŽIĆ, KRAJIŠNIK, and PLAVŠIĆ

952. The Accused closely co-operated with the Bosnian Serb leadership from 1991-1995, knowing that their primary goal was ethnic separation that could only be achieved through violence and forced displacement of non-Serbs. **STANIŠIĆ** watched as KARADŽIĆ predicted massive population displacement in the event of war in BiH—lauding KARADŽIĆ's speech<sup>4049</sup>—and maintained close communication with KARADŽIĆ in the lead-up to the conflict in BiH.<sup>4050</sup> Having warned in October 1991 that Muslims were on a “highway of hell”,<sup>4051</sup> in 1994 KARADŽIĆ reaffirmed the “first strategic goal, which is to get rid of the enemy in our house, meaning the Croats and Muslims and not to be together in one state anymore”.<sup>4052</sup> After pushing the ethnic

<sup>4045</sup> Cross-reference Section [II.F.4\(a\)\(ii\)b.i](#).

<sup>4046</sup> Cross-reference Section [III.C.4](#).

<sup>4047</sup> Cross-reference Section [II.F.4\(b\)\(i\)a](#); Section [II.F.4\(b\)\(i\)b.iii](#); Section [II.F.4\(b\)\(ii\)a.iv](#); Section [II.D.2\(a\)\(iii\)c](#).

<sup>4048</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>4049</sup> DONIARobert: [P01597](#), para.227; [P01590](#), p.1.

<sup>4050</sup> Cross-reference Section [II.F.4\(a\)\(ii\)a](#).

<sup>4051</sup> [P01588](#), p.1.

<sup>4052</sup> [P01934](#), p.5.

separation policy in 1992,<sup>4053</sup> KRAJIŠNIK proclaimed in 1994: “[b]elieve me, the biggest tragedy would be if the Muslims accepted to live with us now. [...] That is the only thing I would never accept”.<sup>4054</sup> In July 1992, PLAVŠIĆ advocated massive population movements to achieve their goals.<sup>4055</sup> STANIŠIĆ and SIMATOVIĆ nonetheless repeatedly deployed their SerbianDB units into operations alongside RS forces, beginning with the SDG in Bijeljina in 1992 and ending with the SDG in Sanski Most in 1995.<sup>4056</sup>

**6. The Accused and fellow JCE members repeatedly confirmed that they shared the same goals**

953. After thousands of non-Serbs had been expelled from their homes in Krajina, SBWS and across RS, JCE members mutually congratulated each other on their progress toward achieving their shared goals at critical junctures. This demonstrates that the Accused shared their fellow JCE members’ intent for the crimes resulting from their pursuit of these goals. For example:

- On 13-14 December 1993, when STANIŠIĆ and other JCE members met in Belgrade to take stock of their goals and plan their next steps, KARADŽIĆ stated that “unification with Serbia is smiling upon us”.<sup>4057</sup>
- On 5 July 1994—RSK Security Day—STANIŠIĆ wrote: “We are now entering the decisive phase of the fight to achieve the common goals of all the Serbian lands, more determined and prepared than ever before”.<sup>4058</sup>
- For the New Year in 1995, MARTIĆ sent STANIŠIĆ a greeting card stating that 1994 “was marked by the effort to attain a common stance in our joint effort – the creation of a unified Serbian state. Hoping that in the new year, 1995, we will be striving for the same aims”.<sup>4059</sup>

<sup>4053</sup> Cross-reference Section [II.F.4\(a\)\(ii\)a](#); Section [II.C.12](#).

<sup>4054</sup> DONIA Robert: [P01597](#), para.70.

<sup>4055</sup> [ID01310](#), p.25-26.

<sup>4056</sup> Cross-reference Section [II.F.4\(b\)](#); Section [II.F.5\(b\)](#).

<sup>4057</sup> [ID00036](#), p.53.

<sup>4058</sup> [P03726](#).

<sup>4059</sup> [P00228](#); [REDACTED].



**7. The Accused's failure to punish the charged crimes reveals their intent for the crimes**

954. **STANIŠIĆ** and **SIMATOVIĆ** had the ability to take punitive measures against those responsible for the CCP crimes against non-Serbs in BiH and Croatia, but they did not.

955. The Accused could have taken disciplinary measures against Unit members and other subordinates in the SerbianDB for their involvement in crimes in BiH and Croatia.<sup>4060</sup> Crimes committed by MUP personnel in combat are punishable under the laws of war.<sup>4061</sup> Moreover, the Accused could have: initiated disciplinary proceedings before the SMUP disciplinary court for “serious violations of their work obligations and duties”;<sup>4062</sup> had Unit members arrested or detained during their deployment outside Serbia;<sup>4063</sup> or significantly docked salaries.<sup>4064</sup> Instead, **STANIŠIĆ** and **SIMATOVIĆ** repeatedly deployed their Unit, under commanders they could trust to perpetrate the CCP crimes.

956. In addition, as security officials, the Accused had the responsibility to take measures to protect non-Serbs, even those living outside Serbia's borders, by ensuring accountability for perpetrators. **STANIŠIĆ** had the power to dispatch his SerbianDB officials and Unit members into RSK and RS to investigate crimes of interest to him.<sup>4065</sup> The Accused had the ability to file criminal complaints for crimes committed in the RSK and RS, to have them prosecuted.<sup>4066</sup> SerbianDB personnel could arrest and detain people,<sup>4067</sup> and **STANIŠIĆ** could personally order an arrest for crimes committed outside Serbia's borders.<sup>4068</sup> Except in rare instances where it was politically expedient and did not impede the CCP,<sup>4069</sup> the Accused declined to use their power and authority to take

<sup>4060</sup> See MILOŠEVIĆ Milan:T.19-20(20-Feb-2020); MILOŠEVIĆ Milan:T.42-44(25-Feb-2020).

<sup>4061</sup> MILOŠEVIĆ Milan:T.7(26-Feb-2020).

<sup>4062</sup> [P02716](#), p.24-29(because of a workplace fist fight with a colleague, a Unit member's pay was docked by 30% for six months; see also p.1-2).

<sup>4063</sup> [1D00093](#), p.16(order for the arrest and detention of a Unit member who deserted IKM Pajzoš in June 1992); [REDACTED].

<sup>4064</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>4065</sup> [2D00143](#); [REDACTED]; KRSMANOVIĆ Dragoslav:T.13(1-Oct-2019); [REDACTED]; [REDACTED]; [REDACTED].

<sup>4066</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>4067</sup> STEVANOVIĆ Obrad:T.11(24-Sep-2020); [REDACTED]. See also [REDACTED]; [REDACTED].

<sup>4068</sup> [REDACTED]; [REDACTED]; [1D00152](#), p.4.

<sup>4069</sup> See e.g. [REDACTED].

action against those who perpetrated crimes that furthered the CCP. By contrast, the SerbianDB was quick to cover up its own involvement in the crimes, [REDACTED].<sup>4070</sup>

957. The Head of the RSK-DB agreed that non-Serbs in the RSK were entitled to the protection of the law of the RSK authorities in full equality with Serbs who were on the same territory, entitled to be protected by the RSK police.<sup>4071</sup> In fact the opposite was true, police units formed and supported by the Accused were themselves active participants in widespread crimes in Croatia and BiH.<sup>4072</sup> That the Accused never took the slightest measure to discipline the Unit members under their direct command, or to prevent or even condemn the crimes committed by the police and security bodies they helped create in Croatia and BiH, makes clear they intended for the crimes to occur. **STANIŠIĆ**'s approval of ARKAN and his SDG acting as part of the RS-MUP police during the ARK 1995 operations<sup>4073</sup> makes clear that he intended the police to commit rather than prevent and punish crimes.

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<sup>4070</sup> [REDACTED]. See [P02040](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>4071</sup> DRAČAAco:T.66(3-Dec-2019).

<sup>4072</sup> [P00131](#), p.3.

<sup>4073</sup> [P01960](#), p.49,52-53,73.

## **V. ALTERNATIVELY, STANIŠIĆ AND SIMATOVIĆ ARE LIABLE FOR THE CHARGED CRIMES THROUGH OTHER FORMS OF CRIMINAL RESPONSIBILITY**

958. In the alternative to committing the charged crimes through their participation in a JCE, the Accused are responsible for having ordered, aided and abetted, and/or planned them. The evidence which shows that the required *actus reus* and *mens rea* requirements are met is set out in full above, and will be cross-referenced below.

### **A. STANIŠIĆ and SIMATOVIĆ are responsible for ordering the crimes committed by members of the Unit, the SDG, and the Scorpions, as well as crimes in Glina (Operation Žaoka), Ljubovo, and Lovinac**

959. STANIŠIĆ and SIMATOVIĆ are responsible for charged crimes which were committed by members of the Unit, the SDG, and the Scorpions.<sup>4074</sup> The Accused were in a position of authority vis-à-vis these perpetrators<sup>4075</sup> and instructed them to carry out operations in the execution of which the crimes were committed.<sup>4076</sup> These instructions had a direct and substantial effect on the commission of the crimes.<sup>4077</sup>

960. In addition to ordering crimes, which were committed by members of the Unit, the SDG, and the Scorpions, the Accused ordered the crimes committed by the SAO-Krajina police and SAO-Krajina TO in Glina (Operation Žaoka), Ljubovo, and Lovinac.<sup>4078</sup> The Accused had authority over the SAO-Krajina police and TO during these operations,<sup>4079</sup> and instructed them to carry out these operations together with the

<sup>4074</sup> Cross-reference Section [III.B.1\(b\)\(i\)](#)-(iii); Section [III.B.1\(c\)\(i\)](#)-(iii); Section [III.B.2\(b\)\(ii\)](#)-(iv); Section [III.B.2\(c\)](#); Section [III.C](#).1-6.

<sup>4075</sup> Cross-reference Section [II.D.2](#). See also Milošević AJ, para.290; Kordić AJ, para.28.

<sup>4076</sup> Cross-reference Section [II.D.2\(a\)\(iii\)](#); Section [II.D.2\(b\)\(iv\)](#); Section [II.F.1\(c\)\(ii\)](#)-(iii); Section [II.F.2\(f\)](#); Section [II.F.4\(b\)\(ii\)](#); Section [II.F.5\(b\)\(iii\)](#). See Karera AJ, para.211; Nahimana AJ, para.481; Renzaho AJ, para.315.

<sup>4077</sup> Cross-reference Section [II.D.2\(a\)\(iii\)](#); Section [II.F.1\(c\)\(ii\)](#)-(iii); Section [II.F.2\(f\)](#); Section [II.F.4\(b\)\(ii\)](#); Section [II.F.5\(b\)\(iii\)](#)-(iv). See Kamuhanda AJ, para.75; Kayishema AJ, para.186; Gacumbitsi AJ, para.184-185.

<sup>4078</sup> Cross-reference Section [III.B.1\(b\)](#).

<sup>4079</sup> Cross-reference Section [II.F.1\(c\)\(ii\)](#).

Unit in the execution of which crimes were committed.<sup>4080</sup> These instructions had a direct and substantial effect on the commission of the crimes.<sup>4081</sup>

961. The Accused intended these crimes to be committed,<sup>4082</sup> or acted with the awareness of the substantial likelihood that deportation, forcible transfer, persecution, and murder would be committed in the execution of the operations.<sup>4083</sup>

**B. STANIŠIĆ and SIMATOVIĆ are responsible for aiding and abetting all crimes charged**

962. Through their acts<sup>4084</sup> the Accused provided practical assistance, encouragement, or moral support that had a substantial effect on the perpetration of the crimes<sup>4085</sup> charged.<sup>4086</sup>

963. The Accused intended these crimes,<sup>4087</sup> or acted in the awareness of the probability that deportation, forcible transfer, persecution, and murder would be committed and that their acts and omissions would assist their commission.<sup>4088</sup>

**C. STANIŠIĆ and SIMATOVIĆ are responsible for planning crimes committed in the attacks on Glina (Operation Žaoka) and Lovinac and the joint operations with the JNA from September 1991**

964. **STANIŠIĆ**<sup>4089</sup> and **SIMATOVIĆ** are responsible for planning crimes committed in the attacks on Glina (Operation Žaoka) and Lovinac to forcibly displace Croats from SAO-Krajina as well as in joint operations with the JNA from September 1991.

<sup>4080</sup> Cross-reference Section [II.F.1\(c\)\(ii\)](#). See Karera AJ, para.211; Nahimana AJ, para.481; Renzaho AJ, para.315.

<sup>4081</sup> Cross-reference Section [II.F.1\(c\)\(ii\)](#); Section [III.B.1\(b\)](#). See Kamuhanda AJ, para.75; Kayishema AJ, para.186; Gacumbitsi AJ, para.184-185.

<sup>4082</sup> Cross-reference Section [IV.C.](#)

<sup>4083</sup> Cross-reference Section [IV.C.4](#). See Blaškić AJ, para.42,166.

<sup>4084</sup> Cross-reference Section [IV.B.](#) See Šainović AJ, para.1649.

<sup>4085</sup> Cross-reference Section [III.](#)

<sup>4086</sup> Cross-reference Section [IV.B.](#)

<sup>4087</sup> Cross-reference Section [IV.C.](#)

<sup>4088</sup> Cross-reference Section [IV.C.4](#). See Simić AJ, para.86; also Mrkšić AJ, para.49,63; Ndindabahizi AJ, para.122.

<sup>4089</sup> CVETKOVIĆVojislav:T.18(1-Sep-2020); CVETKOVIĆVojislav:T.13(1-Sep-2020); CVETKOVIĆVojislav:T.2-3(3-Sep-2020); [REDACTED]; KRSMANOVIĆDragoslav:T.8-9(1-Oct-2019); [REDACTED]; MILOŠEVIĆMilan:T.42-44(25-Feb-2020); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See [REDACTED] [REDACTED].

965. The Accused, together with MARTIĆ and MLADIĆ, designed the Krajina operations in the execution of which crimes were carried out.<sup>4090</sup> The Accused's acts substantially contributed to these crimes.<sup>4091</sup>

966. The Accused intended these crimes be committed,<sup>4092</sup> or acted with an awareness of the substantial likelihood that deportation, forcible transfer, persecution, and murder would be committed in the execution of the operations planned.<sup>4093</sup>

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<sup>4090</sup> Cross-reference Section [II.F.1\(c\)\(ii\)a,c](#); Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(b\)\(i\),\(iii\)](#); Section [III.B.1\(c\)\(ii\)](#)-(iv). See *Milutinović* TJ, fn.84; *Kordić* AJ, para.31.

<sup>4091</sup> Cross-reference Section [II.F.1\(c\)\(ii\)a,c](#); Section [II.F.1\(c\)\(iii\)](#); Section [III.B.1\(b\)\(i\),\(iii\)](#); Section [III.B.1\(c\)\(ii\)](#)-(iv). See *Milošević* AJ, para.268; *Kordić* AJ, para.26.

<sup>4092</sup> Cross-reference Section [IV.C.](#)

<sup>4093</sup> Cross-reference Section [IV.C.4\(b\)](#). See *Milošević* AJ, para.268; *Kordić* AJ, para.29,31.

## VI. SENTENCING<sup>4094</sup>

967. The Accused committed crimes of persecution, murder, and forcible displacement on a massive scale across Croatia and BiH for over four years. Hundreds of thousands of non-Serbs were driven from their homes and untold hundreds were murdered. Should the Trial Chamber find the Accused to be responsible for a substantial portion of the crimes charged in this case, under any form of liability, life imprisonment for each Accused is the only sentence that would fully reflect the gravity of their crimes and their individual circumstances.

### A. Gravity of the offence and totality of culpable conduct

968. The Accused have committed grievous crimes against humanity and war crimes—murder, persecution, deportation, and forcible transfer—which achieved the intended purpose of forcing hundreds of thousands of non-Serbs from their homes and communities across Croatia and BiH. These crimes were committed pursuant to a cruel plan to establish Serb-dominated territories where there had been mixed ethnic communities and areas predominately inhabited by non-Serbs.

969. Numbers can attempt to describe the scale of displacement that was the intended result of the Accused's crimes, but not the human pain and suffering that came with it. In Croatia, the confirmed minimum estimate of persons displaced between 1 April 1991 and 30 April 1995<sup>4095</sup> is 191,000.<sup>4096</sup> Ethnic Croats and other non-Serbs comprised over 97% of this figure.<sup>4097</sup> In BiH, the number of displaced persons in the five charged municipalities is estimated at some 145,000.<sup>4098</sup> At least 71.6% of the non-Serbs who had lived in the five charged BiH municipalities in 1991 were still displaced in 1997-1998.<sup>4099</sup>

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<sup>4094</sup> Pursuant to IRMCT Statute Article 22 and IRMCT Rule 125(B), the Trial Chamber must take into account (i) the gravity of the offence; (ii) the individual circumstances of the convicted person; (iii) the general practice regarding prison sentences in the courts of the former Yugoslavia; and (iv) aggravating or mitigating circumstances.

<sup>4095</sup> This date range excludes displacements of the Serb population in Croatia that occurred in Operations Flash and Storm in May and August 1995: BIJAKJakub:[P00595](#), p.15.

<sup>4096</sup> BIJAKJakub:[P00595](#), p.31-32.

<sup>4097</sup> BIJAKJakub:[P00595](#), p.31.

<sup>4098</sup> TABEAUewa:[P02069](#), p.5.

<sup>4099</sup> TABEAUewa:[P02069](#), p.5.

970. These numbers, some 340,000 displaced Croats, Muslims, and other non-Serbs across two countries, represent the intended result of a programme of violent demographic engineering that sought to achieve ethnically homogenous Serb territories. This programme was carried out for over four years through persecution, deportation, forcible transfer, murder, looting, rape, destruction, and untold other forms of threats and pressure. In addition to the approximately 400 murders included as charged incidents in the Indictment, the evidence shows that an untold number of other killings were committed in the implementation of the CCP. Non-Serbs were imprisoned and mistreated in detention facilities, and scores of villages, homes, churches, mosques, and communities were destroyed in the process.

971. The seriousness of these crimes and the form and degree of the Accused's participation<sup>4100</sup> require life sentences for the Accused. The Accused, acting personally and through the SerbianDB and its units, contributed to this criminal enterprise continuously and enthusiastically for over four years. They collaborated with and enabled the other JCE members who were at the highest levels of police, military, and governmental structures in Serbia, Croatia, and BiH to implement the CCP. Never expressing the slightest regard, regret, or condemnation for the vast crimes and misery that they, their collaborators, and their tools inflicted on the victims, the Accused played an instrumental role in this criminal enterprise from beginning to end.

972. If there is one constant in this case, it is the role that **STANIŠIĆ** played in ensuring the implementation of the CCP throughout 1991-1995. And at **STANIŠIĆ**'s side, from beginning to end, was **SIMATOVIĆ**. The authority and power these Accused possessed were entrusted to them by Serbian President **MILOŠEVIĆ**, who was at the apex of the JCE. Together, using the power and authority derived from their proximity to **MILOŠEVIĆ** and their high-level positions in the SerbianDB, these Accused were instrumental participants in bringing to fruition the plan of violent removal of non-Serbs that they shared with their co-JCE members.

973. The crimes committed by the Accused with their co-JCE members on this massive scale, and the form and degree of their conduct in directly contributing to the criminal enterprise that carried out the crimes over such a sustained period, place the

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<sup>4100</sup> See e.g. *Mrkšić* AJ, para.375; *Aleksovski* AJ, para.182 citing *Kupreškić* TJ, para.852.



crimes and conduct of the Accused among the most egregious and gravest of cases adjudicated at the ICTY/IRMCT. Life sentences for both Accused are fully warranted.

## **B. Individual circumstances of the Accused**

### **1. Aggravating circumstances**

974. The Accused held positions of authority as high-level officials of the SerbianDB. They abused their positions to commit the crimes, thereby abusing their authority.

975. It bears recalling that the Accused were high-level officials of a security and law enforcement body, the SMUP. They were police who had the authority to exercise police powers. Rather than using their authority to investigate and stop crimes, the Accused abused their power by employing their authority and powers of policing to further crime on a massive scale. As set out in detail throughout this Brief, they were instrumental in creating and supporting Serb police organisations in Croatia and BiH that were part and parcel of the Serb Forces that committed the charged crimes. In this case, the police were the criminals. And the Accused were among the highest-level police officials. This cynical abuse of their positions as officials of a police/security body, the SerbianDB of the SMUP, aggravates the gravity of their crimes.

### **2. Mitigating factors**

976. There are no factors in this case which mitigate the gravity of the Accused's conduct or their level of responsibility.

977. The Trial Chamber enjoys considerable discretion in determining what constitutes a mitigating factor and the weight, if any, to be accorded to the factors identified.<sup>4101</sup> The existence of mitigating circumstances does not automatically result in the reduction of sentence,<sup>4102</sup> nor does it preclude the imposition of a life sentence where the gravity of the offences requires it.<sup>4103</sup>

978. In light of the gravity of their crimes, neither the Accused's age nor **STANIŠIĆ's** health condition constitutes an exceptional circumstance that should be considered as a

<sup>4101</sup> *Karadžić* AJ, para.753 citing *Stanišić & Župljanin* AJ, para.1130; *Nyiramasuhuko* AJ, para.3394; *Ngirabatware* AJ, para.265.

<sup>4102</sup> *Prlić* AJ, para.3308.

<sup>4103</sup> *Popović* AJ, para.2053.

mitigating factor.<sup>4104</sup> Although **STANIŠIĆ** does have chronic health issues, should he be sentenced to a period of incarceration, he will continue to receive the necessary medical treatment.

979. The length of these proceedings as such is not a mitigating factor, as only *undue* delays constitute prejudice, even when an accused is detained.<sup>4105</sup> While the combined length of the ICTY and IRMCT proceedings against these Accused is substantial, there were no undue delays, nor is the overall length excessive, since re-trial proceedings are provided for in the Rules. Moreover, **STANIŠIĆ** has spent virtually the entire re-trial, and **SIMATOVIĆ** substantial periods of it, on provisional release.

980. The Accused's role in resolving the UN hostages crisis of summer 1995 does not constitute a mitigating factor, nor does **STANIŠIĆ**'s role in the Dayton Peace process. **STANIŠIĆ** was dispatched as an emissary by **MILOŠEVIĆ** to threaten **KARADŽIĆ** with assassination if he did not release the hostages.<sup>4106</sup> This does not merit mitigation of sentence. **MILOŠEVIĆ**'s interest in procuring a peace agreement was not driven by humanitarian concerns, but rather by his wish to placate the international community and gain relief from the international sanctions and isolation of Serbia, the effects of which, by 1995, were undermining **MILOŠEVIĆ**'s hold on power.<sup>4107</sup> Thus, any conduct of the Accused in facilitating the peace process was not motivated by any humanitarian or other laudable motives justifying mitigation.

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<sup>4104</sup> *Stanišić & Župljanin* AJ, para.1170("limited weight given to advanced age as mitigating factor in the jurisprudence of the Tribunal"); *Popović* AJ, para.2052-2053 *affirming Popović* TJ, para.2169(giving "minimal weight" in mitigation to Beara's age of 70 years); *Tolimir* AJ, para.644(approving "little to no weight" in mitigation to Tolimir's age of 64 years); *M.Simić* SJ, para.98-99; *Semanza* TJ, para.576.

<sup>4105</sup> See IRMCT Statute, Article 19(4)(c). See also *Nyiramasuhuko* AJ, para.375-376,388,390.

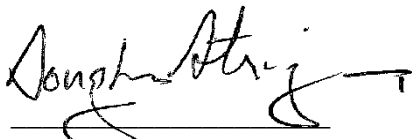
<sup>4106</sup> ROBERTSIvor:T.17(15-Oct-2019); ROBERTSIvor:[1D00430](#), para.135.

<sup>4107</sup> ROBERTSIvor:T.65-66(15-Oct-2019); [REDACTED].

### C. Recommendation

981. Based on the gravity and totality of their crimes, their roles in the crimes, and the relevant aggravating factor, **STANIŠIĆ** and **SIMATOVIĆ** should each be sentenced to life imprisonment.

Word Count: 145,940



Douglas Stringer  
Senior Trial Attorney



Grace Harbour  
Trial Attorney

Dated this 12<sup>th</sup> day of March 2021  
At The Hague, The Netherlands

**UNITED NATIONS**

**INTERNATIONAL RESIDUAL MECHANISM FOR CRIMINAL TRIBUNALS**

**Case No. MICT-15-96-T**

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ &  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION***

---

**ANNEXES A THROUGH G**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**PUBLIC REDACTED ANNEXES**  
**TO PROSECUTION FINAL TRIAL BRIEF**

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**ANNEX A**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**INDEX OF PERSONS WITH A SIGNIFICANT RELATIONSHIP TO THE SerbianDB**

Annex A: Index of Persons with a Significant Relationship to the SerbianDB

1. The evidence in this case has established that those listed below had a significant relationship to the SerbianDB.

**AVRAMOVIĆ, Živomir (Žika) aka AVRAM<sup>1</sup>**

2. [REDACTED].<sup>2</sup> AVRAMOVIĆ beat detainees at the Bosanski Šamac TO, forced some to sing Chetnik songs, and [REDACTED].<sup>3</sup> [REDACTED].<sup>4</sup>

**BAKLAJIĆ, Predrag**

3. BAKLAJIĆ armed and trained Serbs in 1990 in Krajina. After fighting for Borovo Selo and manning the barricades, he trained at Golubić and became a platoon commander of the special unit for Korenica and Vrhovine until February 1992.<sup>5</sup> In November 1991, he introduced himself as commanding a group of men “specially trained” at Golubić.<sup>6</sup>

4. In February 1992, the Knin police reported that BAKLAJIĆ and his unit had committed “a number of different criminal acts”,<sup>7</sup> leading to a criminal investigation for “murder, illegal arrests and fraud”.<sup>8</sup> Around then, BAKLAJIĆ joined the Unit and became an instructor, then the Pajzoš IKM Commander.<sup>9</sup> His formal request for entry into the Unit’s “active” service in April 1992 states: “there is not much I can write about myself because everything is already known”.<sup>10</sup> He remained at Pajzoš after the Unit took on the RSK-MUP JPN nomenclature in June 1992.<sup>11</sup>

5. BAKLAJIĆ died in combat near Zvornik in 1993, and was posthumously honoured in 1996.<sup>12</sup> The SerbianDB paid his funeral expenses, and sent payments to his father, Živko BAKLAJIĆ.<sup>13</sup>

<sup>1</sup> [REDACTED]; 1D00861, p.1; LUKAČDragan:P02731, p.26.

<sup>2</sup> [REDACTED]. [REDACTED]; [REDACTED]. See also [REDACTED]; 1D00861, p.1; [REDACTED].

<sup>3</sup> LUKAČDragan:P02731, p.25-26; LUKAČDragan:P02732, T.1687-1688; [REDACTED]; [REDACTED]; [REDACTED]. See AF1131; [REDACTED]. [REDACTED].

<sup>4</sup> [REDACTED].

<sup>5</sup> P00839, p.1,5,11,15; P03406, p.1; P02710, p.15,19. Cross-reference Section II.F.1(a)(c).

<sup>6</sup> P03297, p.1; P00839, p.11,15.

<sup>7</sup> P03406. See also P03330.

<sup>8</sup> P03409 p.1; NIELSENChristian:T.24(15-Nov-2017); NIELSENChristian:P00850, para.440. See P00849, p.5.

<sup>9</sup> P00839, p.6,12,16; P03238.

<sup>10</sup> P00839, p.13,17.

<sup>11</sup> Cross-reference Section II.D.2(a)(ii)a; P03238.

<sup>12</sup> P00839, p.1-19; [REDACTED]; NIELSENChristian:T.24(15-Nov-2017); P00849, p.5,13.

<sup>13</sup> P03025, p.5; P00839, p.2,3,6. Cross-reference Section II.D.2(a)(vi)c; AnnexE.1; AnnexE.4.



Annex A: Index of Persons with a Significant Relationship to the SerbianDB

**BANJAC, Đurica**

6. BANJAC joined the Unit in November 1991 and was the “duty electrician” at Pajzoš.<sup>14</sup> He was at Ležimir in February 1992.<sup>15</sup> In 1992, BANJAC went to Doboj where he served under BOŽOVIĆ<sub>(DB)</sub>.<sup>16</sup>

7. In November 1993, in a report initialled by **SIMATOVIĆ**, BANJAC’s commander recommended his dismissal for alcoholism and “irresponsible and dishonest behaviour”.<sup>17</sup> BANJAC nonetheless continued working for the SerbianDB; [REDACTED].<sup>18</sup> In November 1995, RADONJIĆ<sub>(DB)</sub> ordered that BANJAC be awarded an engraved pistol “as a memento of the [SerbianDB]”.<sup>19</sup>

8. At the KOSTIĆ Centre ceremony, BANJAC was introduced to MILOŠEVIĆ as a Unit’s “veteran officer”.<sup>20</sup> **STANIŠIĆ** presented BANJAC with an award, spontaneously referring to him as an example of “what we have put into our Unit”.<sup>21</sup>

**BOŽIĆ, Božo and Rade**

9. The brothers Božo and Rade BOŽIĆ—[REDACTED] Unit members [REDACTED].<sup>22</sup>

10. In 1992, before the war in BiH, the BOŽIĆ brothers went to Brčko as Unit members under Captain DRAGAN<sub>(DB)</sub> [REDACTED].<sup>23</sup> They formed and provided training for a “special unit” of local residents.<sup>24</sup> [REDACTED].<sup>25</sup> [REDACTED].<sup>26</sup>

11. By 1993, Captain DRAGAN<sub>(DB)</sub> picked Božo and Rade BOŽIĆ to join him at the *Alfa* Training Centre.<sup>27</sup>

<sup>14</sup> P00553, p.16-17; P00260, p.24.

<sup>15</sup> P00553, p.16-17. *Cross-reference* Section II.D.2(a)(ii).

<sup>16</sup> *Cross-reference* Section II.D.2(a)(iii)c; Section II.F.4(b)(ii)c.ii-iii. P01172; P01171, p.1; P01173, p.1; P01950; [REDACTED].

<sup>17</sup> P00553, p.7(p.6(BCS)); AnnexF; **SIMATOVIĆ**’s initials at the top of the document indicate that he read it. See MIĆIĆRadivoje:T.4(4-Mar-2020).

<sup>18</sup> [REDACTED].

<sup>19</sup> P00553, p.26.

<sup>20</sup> P00256(00:11:23-00:11:26), p.4,8,27.

<sup>21</sup> P00256(00:44:13-00:44:20), p.27.

<sup>22</sup> [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>23</sup> [REDACTED].

<sup>24</sup> 1D00034, p.3; THEUNENSReynaud:P01980, p.486; [REDACTED]; [REDACTED].

<sup>25</sup> [REDACTED]. See also P03149.

<sup>26</sup> [REDACTED]. [REDACTED].

<sup>27</sup> 1D00089, p.4.

Annex A: Index of Persons with a Significant Relationship to the SerbianDB

**BOŽOVIĆ, Radojica aka RAJO/RAJA, aka KOBAC**

12. BOŽOVIĆ was associated with the Accused during almost the entire Indictment period. BOŽOVIĆ, an original Unit member,<sup>28</sup> trained and became an instructor at Golubić under Captain DRAGAN<sub>(DB)</sub>.<sup>29</sup> [REDACTED], the Accused repeatedly deployed BOŽOVIĆ to lead operations throughout the Indictment period.<sup>30</sup> He was subordinated to the Accused,<sup>31</sup> and called **SIMATOVIĆ** “boss”.<sup>32</sup>

13. BOŽOVIĆ was the Unit’s lead instructor and Unit commander IVANOVIĆ<sub>(DB)</sub>’s deputy at Ležimir.<sup>33</sup> By November 1991, he commanded IKM Pajzoš and the Unit’s reconnaissance and intervention platoon.<sup>34</sup> BOŽOVIĆ confirmed that the Unit at Pajzoš comprised SerbianDB employees.<sup>35</sup> [REDACTED].<sup>36</sup>

14. [REDACTED].<sup>37</sup> Shortly thereafter, the Accused sent BOŽOVIĆ to Doboj to establish the Mt. Ozren and Vila camps and lead the Ozren-trained Red Berets in taking over Doboj.<sup>38</sup> Under BOŽOVIĆ’s command and direction, these forces committed crimes against non-Serbs.<sup>39</sup> During the Posavina Corridor operations, BOŽOVIĆ [REDACTED]<sup>40</sup> and regularly met with Captain DRAGAN<sub>(DB)</sub>.<sup>41</sup>

15. After the Posavina Corridor operations, BOŽOVIĆ went to Mt. Tara and commanded the camp as one of “Frenki’s men”.<sup>42</sup> By February 1993, BOŽOVIĆ was at the Skelani camp where he and **SIMATOVIĆ** commanded the Skelani Red Berets.<sup>43</sup> Shortly after,

<sup>28</sup> [REDACTED]; [REDACTED].

<sup>29</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; RFJ-165:T.28(29-May-2018).

<sup>30</sup> [REDACTED]. *Cross-reference* Section II.D.2(a)(iii)c; Section II.D.2(a)(iv)b; Section II.D.2(a)(v); Section II.F.5(b)(i)-(ii),(iv)-(v).

<sup>31</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:P02541, para.12; SLIŠKOVIĆDejan:T.69,83,88(11-Jul-2018); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P00842 p.5.

<sup>32</sup> P00842, p.5; [REDACTED].

<sup>33</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *Cross-reference* Section II.E.4(b)(ii).

<sup>34</sup> P00260, p.23,30,32; [REDACTED]. *Cross-reference* Section II.E.4(b)(iii).

<sup>35</sup> [REDACTED].

<sup>36</sup> [REDACTED]. *Cross-reference* Section II.D.2(a)(ii).

<sup>37</sup> [REDACTED].

<sup>38</sup> *Cross-reference* Section II.D.2(a)(iii)c; Section II.E.4(c)(ii); Section II.F.4(b)(ii)c.ii-iii.

<sup>39</sup> *Cross-reference* Section III.C.4.

<sup>40</sup> [REDACTED].

<sup>41</sup> [REDACTED]; RFJ-165:T.28-29(29-May-2018).

<sup>42</sup> GREKULOVIĆSrđan:T.28,31(8-Oct-2019); GREKULOVIĆSrđan:T.37-38(9-Oct-2019). *Cross-reference* Section II.D.2(a)(iv)a; Section II.E.4(d)(iv).

<sup>43</sup> P01942, p.1; P03621, p.1; 2D00184, p.2-3. *Cross-reference* Section II.D.2(a)(iv)a; Section II.E.4(d)(ii).

Annex A: Index of Persons with a Significant Relationship to the SerbianDB

BOŽOVIĆ—under **SIMATOVIĆ**’s overall command<sup>44</sup>—led the Unit and other SerbianDB-trained forces in the scorched-earth Podrinje operations.<sup>45</sup>

16. In 1993, BOŽOVIĆ attended the Novi Sad meeting establishing the Scorpions as a SerbianDB satellite unit, along with BOCA<sub>(DB)</sub>, MRGUD<sub>(DB)</sub>, BADŽA, and KERTES, among others.<sup>46</sup>

17. During Pauk, BOŽOVIĆ commanded a Unit detachment.<sup>47</sup> He reported to and met regularly with the Accused, and could not be engaged without **STANIŠIĆ**’s consent.<sup>48</sup> Frequent references to “BOŽOVIĆ” and his code name “Kobac”<sup>49</sup> in the Pauk operational diary demonstrate his high level of involvement in the operation.<sup>50</sup> BOŽOVIĆ was in charge of [REDACTED]<sup>51</sup> and a detention centre where spouses of enemy fighters were detained and made to clean and cook for “Frenki’s troops”.<sup>52</sup>

18. During the Trnovo operations, BOŽOVIĆ was present at the joint MUP command where he met with BOCA<sub>(DB)</sub>.<sup>53</sup> BOŽOVIĆ was also at the forefront of the SerbianDB’s involvement in the ARK operations as he was deployed in September 1995 to command a Unit contingent.<sup>54</sup> In SBWS, he was based at Pajzoš with approximately 100 Unit members.<sup>55</sup> With SerbianDB backing, BOŽOVIĆ wielded significant authority over high-ranking SVK officers.<sup>56</sup> Later on, **STANIŠIĆ** and **SIMATOVIĆ** joined BOŽOVIĆ at Pajzoš, from where they controlled the SBWS 1995 operations.<sup>57</sup>

19. BOŽOVIĆ received SerbianDB payments from 1993 to 1995.<sup>58</sup> In May 1996, he was awarded for his wartime activities with the Unit.<sup>59</sup> At the KOSTIĆ Centre ceremony,

<sup>44</sup> [REDACTED]; [REDACTED]; RFJ-083:T.61(10-May-2018); RFJ-083:T.37-38(8-May-2018).

<sup>45</sup> *Cross-reference* Section II.D.2(a)(iv)b; Section II.F.5(b)(i).

<sup>46</sup> STOPARIĆGoran:P00796, para.69. *Cross-reference* Section II.D.2(c).

<sup>47</sup> *Cross-reference* Section II.F.5(b)(ii)b.

<sup>48</sup> [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:P02541, para.12; SLIŠKOVIĆDejan:T.69,83,88(11-Jul-2018); [REDACTED]; MILOVANOVIĆManojlo:P02934, T.4391; [REDACTED]; P00820, p.10-13,53; P02598, p.48.

<sup>49</sup> P03751(demonstrates that BOŽOVIĆ is “Kobac”). See SLIŠKOVIĆDejan:P02597, p.4; [REDACTED]; [REDACTED]; P01122.

<sup>50</sup> P00820, p.5-11,13,18,23,27-28,31-32,34-36,38,41-43,46,48,51,56,58,106-107,122.

<sup>51</sup> *Cross-reference* Section II.D.4(c)(i).

<sup>52</sup> SLIŠKOVIĆDejan:T.36,44-45,47(10-Jul-2018); SLIŠKOVIĆDejan:T.15(11-Jul-2018); SLIŠKOVIĆDejan:P02538, para.15.

<sup>53</sup> STOPARIĆGoran:P00796, para.100; [REDACTED].

<sup>54</sup> *Cross-reference* Section II.F.5(b)(ii)(iv).

<sup>55</sup> P00842, p.3.

<sup>56</sup> P03090, p.5-6,7; KARANMladen:T.48,50(30-Jan-2020); P00817, p.1.

<sup>57</sup> P00817, p.1,6. *Cross-reference* Section II.F.5(b)(ii)(v).

<sup>58</sup> AnnexE.1.

<sup>59</sup> P00849, p.5,8,9,11.

Annex A: Index of Persons with a Significant Relationship to the SerbianDB

BOŽOVIĆ was introduced to MILOŠEVIĆ as a Unit's "veteran officer". MILOŠEVIĆ told BOŽOVIĆ that he had read BOŽOVIĆ's reports.<sup>60</sup>

20. BOŽOVIĆ remained close to STANIŠIĆ after 1995. [REDACTED].<sup>61</sup>

**BUJOŠEVIĆ, Nenad aka VELIKI RAMBO ("BIG RAMBO")<sup>62</sup>**

21. BUJOŠEVIĆ participated as an SDG member in operations in [REDACTED], Zvornik, and [REDACTED].<sup>63</sup> [REDACTED].<sup>64</sup> [REDACTED].<sup>65</sup> [REDACTED].<sup>66</sup> [REDACTED].<sup>67</sup> In 1996, BUJOŠEVIĆ joined the JSO/Unit.<sup>68</sup>

22. After BUJOŠEVIĆ was wounded in Velika Kladuša,<sup>69</sup> [REDACTED].<sup>70</sup> BUJOŠEVIĆ received SerbianDB payments in 1994-1995.<sup>71</sup>

**BULATOVIĆ, Srdjan [REDACTED]<sup>72</sup>**

23. [REDACTED]<sup>73</sup> He received SerbianDB payments in [REDACTED]-1995.<sup>74</sup>

**ĆULIBRK, Saša**

24. ĆULIBRK became involved with the Unit by 10 April 1992,<sup>75</sup> the day before the Unit deployed from Pajzoš to Bosanski Šamac, where they committed horrific crimes.<sup>76</sup> He commanded units in SAO-SBWS and in BiH.<sup>77</sup> [REDACTED]<sup>78</sup>

25. [REDACTED],<sup>79</sup>[REDACTED].<sup>80</sup>

<sup>60</sup> P00256(00:09:06-00:09:18), p.4.

<sup>61</sup> [REDACTED].

<sup>62</sup> [REDACTED]; [REDACTED];[REDACTED].

<sup>63</sup> [REDACTED]; P02858, p.14.

<sup>64</sup> [REDACTED].

<sup>65</sup> [REDACTED].

<sup>66</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>67</sup> [REDACTED]; [REDACTED]. Cross-reference Section II.E.4(e)(i).

<sup>68</sup> [REDACTED]; [REDACTED]; [REDACTED];[REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>69</sup> [REDACTED]; [REDACTED]; [REDACTED]; P02858, p.14.

<sup>70</sup> [REDACTED]; [REDACTED].

<sup>71</sup> AnnexE.1; AnnexE.2.

<sup>72</sup> [REDACTED].

<sup>73</sup> [REDACTED]; [REDACTED].

<sup>74</sup> AnnexE.1; AnnexE.2.

<sup>75</sup> P02705, p.13.

<sup>76</sup> P02705, p.13. Cross-reference Section II.F.4(b)(ii)a.iv; Section III.C.3.

<sup>77</sup> P01709, p.1.

<sup>78</sup> [REDACTED].

<sup>79</sup> [REDACTED]; [REDACTED].

<sup>80</sup> [REDACTED].

Annex A: Index of Persons with a Significant Relationship to the SerbianDB

**DIMIĆ, Milan**

26. DIMIĆ joined the Unit in Ležimir on 28 November 1991.<sup>81</sup> He served in Doboj under BOŽOVIĆ<sub>(DB)</sub>,<sup>82</sup> and died in combat on 13 July 1992.<sup>83</sup> His parents Branko and Slavka DIMIĆ were paid his salary and per diems.<sup>84</sup> In 1996, the Unit honoured DIMIĆ posthumously.<sup>85</sup>

**DORĐEVIĆ, Dragan aka CRNI**<sup>86</sup>

27. CRNI joined the Unit on 5 October 1991.<sup>87</sup> By December, he was an instructor at Pajzoš<sup>88</sup> and deputy commander of a machine-gun squad.<sup>89</sup> STANIŠIĆ signed a request for his operative check on 18 February 1992.<sup>90</sup> SIMATOVIĆ commanded and maintained regular contact with CRNI.<sup>91</sup>

28. On 16-17 April 1992, following SIMATOVIĆ's briefing and deployment, CRNI led a group of Unit members and Pajzoš-trained Red Berets in the Bosanski Šamac takeover. Although this group was formally re-subordinated to the JNA during the takeover, CRNI remained in command, reporting directly to SIMATOVIĆ.<sup>92</sup>

29. After the JNA pulled out of BiH on 19 May 1992, CRNI was appointed commander of the 2<sup>nd</sup> Posavina Brigade,<sup>93</sup> but nevertheless remained a Unit member subordinate to the Accused.<sup>94</sup> Following the Bosanski Šamac operation, CRNI and his men continued along the Posavina Corridor to Brčko, merging with a Unit contingent under IVANOVIĆ<sub>(DB)</sub>'s command and SIMATOVIĆ's direct authority.<sup>95</sup>

<sup>81</sup> P02706, p.1,3,6,8.

<sup>82</sup> P01172(listed as "DANIĆ" in English translation; see p.1 of BCS version for handwritten original. The Prosecution submits that the name in the handwritten original is Milan DIMIĆ.); P01173; P02374, p.4; P02374, p.4. Cross-reference Section II.D.2(a)(iii)c; Section II.F.4(b)(ii)c.ii-iii.

<sup>83</sup> P02706, p.1,3,9; [REDACTED].

<sup>84</sup> P02706, p.1; Annex E.1; Annex E.4. Cross-reference Section II.D.2(a)(vi)c.

<sup>85</sup> P02706, p.4-5; P00849, p.5,13.

<sup>86</sup> P00846, p.1.

<sup>87</sup> P00845, p.14-15,18; [REDACTED].

<sup>88</sup> [REDACTED]; [REDACTED]; P00846, p.3.

<sup>89</sup> P00260, p.23-24,35.

<sup>90</sup> P00845, p.2(ENG)(BCS); P02841, p.2(BCS). See also [REDACTED].

<sup>91</sup> [REDACTED]; [REDACTED]; [REDACTED]. See also [REDACTED]; [REDACTED].

<sup>92</sup> [REDACTED]; P01989, p.1. Cross-reference Section II.D.2(a)(iii)a; Section II.F.4(b)(ii)a.iv.

<sup>93</sup> [REDACTED]; P00846, p.3; P02048, p.1; [REDACTED]; [REDACTED]; [REDACTED]; P01953, p.2; [REDACTED]; P01938, p.256-257; P03612, p.3. See AF1081.

<sup>94</sup> [REDACTED]; RFJ-035:T.8(18-Apr-2018); [REDACTED]. See [REDACTED]. Cross-reference Section II.D.2(a)(iii)a; Section II.F.4(b)(ii)a.iv.

<sup>95</sup> [REDACTED]; [REDACTED]; [REDACTED]; P02045, p.3. Cross-reference Section II.D.2(a)(iii)b; Section II.F.4(b)(ii)b.

Annex A: Index of Persons with a Significant Relationship to the SerbianDB

30. When the VRS arrested CRNI in August 1992, **STANIŠIĆ** secured his release within days.<sup>96</sup> In October 1992, after Šamac's local Serb authorities contacted the SerbianDB, CRNI redeployed to Bosanski Šamac to lead an assault battalion in combat operations in Posavina.<sup>97</sup> In November 1992, **STANIŠIĆ** was directly involved in discussions with the VRS regarding whether CRNI would be allowed to continue operating in the Bosanski Šamac area.<sup>98</sup>

**[REDACTED]**<sup>99</sup>

31. **[REDACTED]**.<sup>100</sup> **[REDACTED]**.<sup>101</sup> **[REDACTED]**.<sup>102</sup> **[REDACTED]**.<sup>103</sup>  
**[REDACTED]**.<sup>104</sup>

**DRAČA, Aco**

32. DRAČA was one of the persons through whom the SerbianDB controlled the SAO-Krajina/RSK-DB.<sup>105</sup> After meeting with MARTIĆ and ORLOVIĆ<sub>(DB)</sub> at the end of 1991, MARTIĆ assigned DRAČA to work under ORLOVIĆ<sub>(DB)</sub>'s authority.<sup>106</sup> Under his leadership, DRAČA formed the SAO-KrajinaDB branch in Benkovac, which was linked to the Knin Centre and operated under ORLOVIĆ<sub>(DB)</sub>'s direction.<sup>107</sup>

33. Following ORLOVIĆ<sub>(DB)</sub>'s removal from the RSK-DB in August 1992, DRAČA was appointed RSK-DB deputy chief,<sup>108</sup> and, **[REDACTED]**, RSK-DB head in June 1993.<sup>109</sup> **[REDACTED]**.<sup>110</sup> **[REDACTED]**.<sup>111</sup> DRAČA **[REDACTED]**,<sup>112</sup> **[REDACTED]** regularly reported outside his chain of command directly to the SerbianDB.<sup>113</sup>

<sup>96</sup> **[REDACTED]**; P00846, p.3. *Cross-reference* Section II.D.2(a)(iii)a.

<sup>97</sup> **[REDACTED]**; P01953, p.1,3; P01919, p.2-3; P03612, p.3; P03142, p.1; **[REDACTED]** *Cross-reference* Section II.D.2(a)(iii)a.

<sup>98</sup> P01988; P01989; THEUNENSReynaud:T.92-93(22-Mar-2018). *Cross-reference* Section II.D.2(a)(iii)a.

<sup>99</sup> **[REDACTED]**.

<sup>100</sup> **[REDACTED]**; **[REDACTED]**; **[REDACTED]**. *See* **[REDACTED]**.

<sup>101</sup> **[REDACTED]**; **[REDACTED]**.

<sup>102</sup> **[REDACTED]**.

<sup>103</sup> **[REDACTED]**; **[REDACTED]**; **[REDACTED]**.

<sup>104</sup> **[REDACTED]**; **[REDACTED]**.

<sup>105</sup> **[REDACTED]**. *See* P00589, p.1-2.

<sup>106</sup> **[REDACTED]**; DRAČAAco:T.64-65(27-Nov-2019).

<sup>107</sup> **[REDACTED]**; DRAČAAco:T.64-65(27-Nov-2019).

<sup>108</sup> DRAČAAco:T.2,64-65(27-Nov-2019).

<sup>109</sup> **[REDACTED]**. *See* DRAČAAco:T.64-65(27-Nov-2019); **[REDACTED]**.

<sup>110</sup> **[REDACTED]**. **[REDACTED]**.

<sup>111</sup> **[REDACTED]**.

<sup>112</sup> **[REDACTED]**.

<sup>113</sup> DRAČAAco:T.36,40-41(3-Dec-2019); P03818. *See* **[REDACTED]**.

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**DRAČA, Nedeljko**

34. [REDACTED].<sup>114</sup> [REDACTED].<sup>115</sup> [REDACTED].<sup>116</sup> DRAČA was deployed to Doboј where he served under BOŽOVIĆ<sub>(DB)</sub>.<sup>117</sup> [REDACTED].<sup>118</sup>

**ĐURKOVIĆ, Vojkan**

35. ĐURKOVIĆ was an SDS field operative in Bijeljina [REDACTED].<sup>119</sup> [REDACTED].<sup>120</sup> [REDACTED].<sup>121</sup> ĐURKOVIĆ played a key role in deporting Muslims from Bijeljina,<sup>122</sup> [REDACTED].<sup>123</sup> In 1994, in a report labelled “Forward to FRENKI”,<sup>124</sup> which was also distributed to STANIŠIĆ,<sup>125</sup> the Sigma intelligence group reported that ĐURKOVIĆ was using his position to extort money by moving Muslim families out of Bijeljina.<sup>126</sup> ĐURKOVIĆ was among the SDG troops reviewed by KARADŽIĆ in Bijeljina in September 1995.<sup>127</sup>

**EĆIM, Ljuban**

36. EĆIM was one of the commanders of a Banja Luka CSB special unit that was notorious for its criminality against non-Serb civilians in 1992.<sup>128</sup> By 1994 and 1995, he led a Banja Luka DB “Red Berets” unit that cooperated closely with ARKAN during the ARK operations in 1995, under the informal command of the Accused, and [REDACTED].<sup>129</sup> [REDACTED].<sup>130</sup> Members of his unit trained at Pajzoš.<sup>131</sup>

<sup>114</sup> [REDACTED]. [REDACTED].

<sup>115</sup> [REDACTED].

<sup>116</sup> [REDACTED].

<sup>117</sup> Cross-reference Section II.D.2(a)(iii)c; Section II.F.4(b)(ii)c.ii-iii; P01171; P01172; P01173; P01950.

<sup>118</sup> [REDACTED]; [REDACTED]. [REDACTED].

<sup>119</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>120</sup> [REDACTED]; P01618(00:01:00-00:04:05). [REDACTED].

<sup>121</sup> [REDACTED]; [REDACTED].

<sup>122</sup> [REDACTED]; P01650(00:46:20-00:50:27).

<sup>123</sup> [REDACTED].

<sup>124</sup> P01651, p.1.

<sup>125</sup> P01651, p.1(ENG)(BCS). See DRAČAAco:T.35-36(3-Dec-2019)(confirming that “NRDB” means that the report was to be sent to STANIŠIĆ as head of the SerbianDB); [REDACTED]. See AnnexF, p.1-2.

<sup>126</sup> P01651, p.5. Cross-reference Section II.F.4(a)(ii)b.

<sup>127</sup> P01618; [REDACTED]. See also [REDACTED]; [REDACTED]; MILOVANOVIĆManoljo:P02934, T.4610-4611.

<sup>128</sup> NIELSENChristian:P00850, para.675-676; [REDACTED].

<sup>129</sup> [REDACTED]; [REDACTED]; 1D00125, p.1. Cross-reference Section II.F.5(b)(iv). See 1D00037, p.95; P03681; NIELSENChristian:P00850, para.912.

<sup>130</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>131</sup> P03513, p.4. Cross-reference Section II.E.4(b)(iii).



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**FILIPOVIĆ, Dragan aka FIĆO or MAJOR FIĆA**<sup>132</sup>

37. FILIPOVIĆ was closely linked to the Accused throughout the Indictment period. In September 1990, FILIPOVIĆ became an operative within Belgrade Centre's 2<sup>nd</sup> Department, and became **SIMATOVIĆ**'s direct subordinate shortly thereafter.<sup>133</sup> **STANIŠIĆ** appointed FILIPOVIĆ the 2<sup>nd</sup> Administration's Deputy Chief in October 1993, a position he retained throughout the remainder of the Indictment period.<sup>134</sup> [REDACTED].<sup>135</sup>

38. **SIMATOVIĆ** brought FILIPOVIĆ to Golubić to assist Captain DRAGAN<sub>(DB)</sub> with the training.<sup>136</sup> [REDACTED];<sup>137</sup> while at Golubić, he worked closely with ORLOVIĆ<sub>(DB)</sub>.<sup>138</sup> Around July 1991, FILIPOVIĆ went to Korenica camp, where he and **SIMATOVIĆ** trained local recruits and SAO-Krajina police.<sup>139</sup> [REDACTED].<sup>140</sup> [REDACTED].<sup>141</sup>

39. In 1994 and 1995, FILIPOVIĆ played a key role in the Unit's joint operations.<sup>142</sup> During Pauk, he trained JATD recruits based at Lipovica camp in preparation for their deployment,<sup>143</sup> and often went to Petrova Gora.<sup>144</sup> He coordinated all SMUP forces in the ARK operations.<sup>145</sup> FILIPOVIĆ also commanded 100 Unit members based at Pajzoš, working closely with BOŽOVIĆ<sub>(DB)</sub>, who was always present in the field while FILIPOVIĆ attended meetings in Belgrade.<sup>146</sup> They were later joined by the Accused at Pajzoš, from where they commanded the SBWS 1995 operations.<sup>147</sup> In a SerbianDB official note initialled by **SIMATOVIĆ** and forwarded to **STANIŠIĆ**,<sup>148</sup> FILIPOVIĆ was reported as having ordered the recruitment of criminals to join the Unit in summer 1995.<sup>149</sup>

<sup>132</sup> P01980, p.226.

<sup>133</sup> [REDACTED]; NIELSENChristian:T.34-35,37-38(14-Nov-2017); P00831, p.47; NIELSENChristian:P00850, para.85. *Cross-reference* Section II.B.2.

<sup>134</sup> [REDACTED]; P03195, p.5; P00860; DRAGICEVIĆVlado:T.34(17-Oct-2019).

<sup>135</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>136</sup> *Cross-reference* Section II.E.4(a)(i).

<sup>137</sup> [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:P02538, para.3.

<sup>138</sup> RFJ-066:T.29(10-Jul-2017).

<sup>139</sup> [REDACTED]; [REDACTED]; RFJ-066:T.40-41(10-Jul-2017); MAKSIĆRadoslav:T.16-17(21-Jun-2017); 1D00025, p.2; P03417, p.2. *Cross-reference* Section II.E.4(a)(iv).

<sup>140</sup> [REDACTED]; [REDACTED].

<sup>141</sup> [REDACTED]. [REDACTED].

<sup>142</sup> *Cross-reference* Section II.F.5(b)(ii),(iv)-(v).

<sup>143</sup> [REDACTED].

<sup>144</sup> KRSMANOVIĆDragoslav:1D00384, para.64; [REDACTED]; SLIŠKOVIĆDejan:P02538, para.3; [REDACTED].

<sup>145</sup> *Cross-reference* Section II.F.5(b)(iv)a.

<sup>146</sup> [REDACTED]; KRSMANOVIĆDragoslav:T.15(3-Oct-2019); P00842, p.3.

<sup>147</sup> P00817, p.1,6. *Cross-reference* Section II.F.5(b)(v).

<sup>148</sup> P02600, p.14(BCS)(**SIMATOVIĆ** initialled RADONJIĆ<sub>(DB)</sub>'s report and forwarded it to **STANIŠIĆ** ("NRDB")). See AnnexF, p.1,5-6.

<sup>149</sup> P02600, p.19-20.

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40. In May 1996, FILIPOVIĆ was decorated for his wartime activities with the Unit.<sup>150</sup> FILIPOVIĆ received SerbianDB payments in 1995.<sup>151</sup>

**[REDACTED]**<sup>152</sup>

41. [REDACTED],<sup>153</sup> [REDACTED].<sup>154</sup> [REDACTED]<sup>155</sup> [REDACTED],<sup>156</sup> [REDACTED].<sup>157</sup>

42. [REDACTED].<sup>158</sup> [REDACTED],<sup>159</sup> [REDACTED].<sup>160</sup> [REDACTED].<sup>161</sup> [REDACTED].<sup>162</sup>

**[REDACTED]**

43. [REDACTED].<sup>163</sup> [REDACTED].<sup>164</sup> [REDACTED].<sup>165</sup>

**GOLUBOVIĆ, Srdjan [REDACTED]**<sup>166</sup>

44. [REDACTED].<sup>167</sup> A photograph taken just after the Bijeljina takeover depicts GOLUBOVIĆ in full SDG uniform kicking fatally injured civilians.<sup>168</sup> He later participated in Operation Pauk.<sup>169</sup> He received SerbianDB payments in [REDACTED]-1995.<sup>170</sup>

**IVANOVIĆ, Živojin aka ŽIKA CRNOGORAC**<sup>171</sup>

45. IVANOVIĆ, an original Unit member,<sup>172</sup> was [REDACTED] at Golubić,<sup>173</sup> [REDACTED].<sup>174</sup> He was at the Knin fortress<sup>175</sup> and Šamarica<sup>176</sup> and played a leading role

<sup>150</sup> [REDACTED]; P00849, p.5,9,11.

<sup>151</sup> AnnexE.1.

<sup>152</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>153</sup> [REDACTED]; [REDACTED].

<sup>154</sup> [REDACTED].

<sup>155</sup> [REDACTED].

<sup>156</sup> [REDACTED]; [REDACTED]. [REDACTED]. See also [REDACTED]; [REDACTED].

<sup>157</sup> [REDACTED]; [REDACTED].

<sup>158</sup> [REDACTED].

<sup>159</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>160</sup> [REDACTED]; [REDACTED].

<sup>161</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>162</sup> [REDACTED].

<sup>163</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>164</sup> [REDACTED]; [REDACTED].

<sup>165</sup> [REDACTED].

<sup>166</sup> [REDACTED].

<sup>167</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>168</sup> P00429; [REDACTED]; [REDACTED].

<sup>169</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>170</sup> AnnexE.1; [REDACTED].

<sup>171</sup> [REDACTED]; [REDACTED].

<sup>172</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P00263, p.2;

KRSMANOVIĆDragoslav:T.45(2-Oct-2019).

<sup>173</sup> [REDACTED]; [REDACTED].

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in the Unit's operations in Ljubovo and Glina, among others.<sup>177</sup> [REDACTED].<sup>178</sup> By the autumn of 1991, he was at Ležimir and Pajzoš; [REDACTED],<sup>179</sup> he served as the Unit's commander.<sup>180</sup> [REDACTED].<sup>181</sup>

46. In June 1992, under **SIMATOVIĆ**'s direct command, IVANOVIĆ led a Unit contingent in Brčko.<sup>182</sup> IVANOVIĆ and those he commanded [REDACTED] committed crimes [REDACTED].<sup>183</sup> [REDACTED].<sup>184</sup>

47. During Pauk, IVANOVIĆ accompanied the convoy that departed from Lipovica camp to Petrova Gora,<sup>185</sup> and participated in combat operations under the Accused's command.<sup>186</sup> He also trained ABDIĆ's forces.<sup>187</sup> [REDACTED].<sup>188</sup>

48. During the KOSTIĆ Centre ceremony, IVANOVIĆ played a prominent role, introducing the Unit's "veteran officers" to MILOŠEVIĆ.<sup>189</sup>

**IVKOVIĆ, Slobodan**

49. IVKOVIĆ was among the Serb policemen who resigned from the Croatian SUP around April 1991.<sup>190</sup> By July 1991, he was working for the SerbianDB.<sup>191</sup> [REDACTED].<sup>192</sup> [REDACTED].<sup>193</sup>

50. [REDACTED].<sup>194</sup> [REDACTED].<sup>195</sup> [REDACTED].<sup>196</sup>

<sup>174</sup> [REDACTED].

<sup>175</sup> P00271; [REDACTED].

<sup>176</sup> P03233.

<sup>177</sup> 2D00897(01:24:55-01:29:37), p.1-2; P00260, p.29; [REDACTED]; P01986; P03741, p.3; 1D00047; P03233, p.1; P03237; 1D00064, p.1; THEUNENSReynaud:T.26-27(7-Mar-2018). *Cross-reference* Section II.F.1(c)(ii)a-b.

<sup>178</sup> [REDACTED].

<sup>179</sup> [REDACTED].

<sup>180</sup> [REDACTED]. *See* [REDACTED]; P00260, p.4,23-24,29-34.

<sup>181</sup> [REDACTED]; NIELSENChristian:P00850, para.195; [REDACTED];[REDACTED]. *Cross-reference* Section II.D.2(a)(ii); Section II.D.2(a)(ii)a.

<sup>182</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>183</sup> [REDACTED]; [REDACTED]; [REDACTED]; 2D00089, p.1-2,5,10; STOPARIĆGoran:T.20-22,24(30-Nov-2017).

<sup>184</sup> [REDACTED]; [REDACTED]. [REDACTED].

<sup>185</sup> [REDACTED]; [REDACTED].

<sup>186</sup> [REDACTED]; SLIŠKOVIĆDejan:T.88(11-Jul-2018); SLIŠKOVIĆDejan:T.88(11-Jul-2018); [REDACTED].

<sup>187</sup> [REDACTED]; [REDACTED].

<sup>188</sup> [REDACTED].

<sup>189</sup> P00256(00:09:06-00:09:18), p.4.

<sup>190</sup> [REDACTED]; [REDACTED]; P00519, p.1; [REDACTED]; [REDACTED].

<sup>191</sup> [REDACTED]; [REDACTED]; P00519, p.1.

<sup>192</sup> [REDACTED];[REDACTED].

<sup>193</sup> [REDACTED].

<sup>194</sup> [REDACTED].

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**JANJATOVIĆ, Bogoslav**

51. JANJATOVIĆ joined the Unit in 1991,<sup>197</sup> after training at Golubić under Captain DRAGAN<sub>(DB)</sub>, and serving in BAKLAJIĆ<sub>(DB)</sub>'s Vrhovine special purpose platoon,<sup>198</sup> which engaged in crimes against non-Serbs in SAO-Krajina.<sup>199</sup> By May 1992, JANJATOVIĆ was with the Unit in Ilok.<sup>200</sup> When the Accused formalised the Unit as the JATD in August 1993, SIMATOVIĆ approved a background check request for JANJATOVIĆ.<sup>201</sup> In 1996, in a request for transfer to the SerbianJB, JANJATOVIĆ noted that he had been “formally employed” by the JATD since June 1994, but that “informally” he had been a JATD member since 1991 and afterwards participated “in all combat operations led by the JATD”.<sup>202</sup> SIMATOVIĆ signed and forwarded the request to the relevant service.<sup>203</sup> JANJATOVIĆ received SerbianDB payments in 1993-1995.<sup>204</sup> He was decorated for his actions with the Unit in May 1996.<sup>205</sup>

**[REDACTED]**

52. [REDACTED],<sup>206</sup> [REDACTED].<sup>207</sup> [REDACTED].<sup>208</sup> [REDACTED].<sup>209</sup>  
[REDACTED].<sup>210</sup>

**JEŠURIĆ, Predrag**

53. Bijeljina Police Chief JEŠURIĆ<sup>211</sup> played a key role in the Bijeljina takeover.<sup>212</sup> In early 1992, he secured weapons through the SMUP.<sup>213</sup> [REDACTED].<sup>214</sup> [REDACTED].<sup>215</sup>

<sup>195</sup> [REDACTED]; [REDACTED].

<sup>196</sup> [REDACTED].

<sup>197</sup> P02710, p.13-14.

<sup>198</sup> P02710, p.15,19,22.

<sup>199</sup> P03406. *See also* P03330.

<sup>200</sup> P02710, p.20,22.

<sup>201</sup> P02710, p.28,30(p.23(BCS))(SIMATOVIĆ initialled the request). *Cross-reference* Section II.D.2(a)(vi).a; AnnexF, p.5-6.

<sup>202</sup> P02710, p.13. *Cross-reference* Section II.D.2(a)(vi).c. *See* SLIŠKOVIĆDejan:P02541, para.20; [REDACTED]; [REDACTED].

<sup>203</sup> P02710, p.12(p.8(BCS)).

<sup>204</sup> AnnexE.1.

<sup>205</sup> P00849, p.5,8,9,11.

<sup>206</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>207</sup> [REDACTED].

<sup>208</sup> [REDACTED].

<sup>209</sup> [REDACTED].

<sup>210</sup> [REDACTED]. [REDACTED].

<sup>211</sup> [REDACTED].

<sup>212</sup> *Cross-reference* Section II.F.4(b)(i).a.

<sup>213</sup> P03472, p.2.

<sup>214</sup> [REDACTED]; [REDACTED]. *See also* P01787.

<sup>215</sup> [REDACTED].

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**JOVANOVIĆ, Zvezdan ZMIJA aka ZVEKŦ<sup>216</sup>**

54. JOVANOVIĆ [REDACTED],<sup>217</sup> and joined the Unit in 1991.<sup>218</sup> [REDACTED].<sup>219</sup> In early 1993, JOVANOVIĆ played a prominent role in the Podrinje operations, commanding training at Tara<sup>220</sup> and, as BOŽOVIĆ<sub>(DB)</sub>'s deputy, leading the Unit and other SerbianDB-trained forces in combat operations.<sup>221</sup> By August 1993, JOVANOVIĆ commanded Pajzoš.<sup>222</sup>

55. When the Accused formalised the Unit as the JATD, the SerbianDB requested a background check on JOVANOVIĆ. Despite revealing prior criminal convictions, he retained his position within the Unit until the end of the Indictment period and beyond.<sup>223</sup>

56. During Pauk, JOVANOVIĆ was the Accused's immediate guard and regularly visited Magarčevac.<sup>224</sup>

57. In 1995, JOVANOVIĆ supervised training at the Unit's camps at Tara<sup>225</sup> and Pajzoš,<sup>226</sup> [REDACTED].<sup>227</sup> [REDACTED].<sup>228</sup> During the Unit's final deployment to SBWS, JOVANOVIĆ led a Unit contingent, [REDACTED].<sup>229</sup> [REDACTED].<sup>230</sup>

58. JOVANOVIĆ was honoured in 1996 for his wartime activities with the Unit.<sup>231</sup> At the KOSTIĆ Centre ceremony, he was introduced to MILOŠEVIĆ as a Unit's "veteran officer".<sup>232</sup>

<sup>216</sup> RFJ-150:T.23-24(22-May-2018); [REDACTED]; [REDACTED].

<sup>217</sup> [REDACTED].

<sup>218</sup> SLIŠKOVIĆDejan:P02538, para.3; [REDACTED].

<sup>219</sup> [REDACTED]. *Cross-reference* Section III.C.3(b).

<sup>220</sup> P02834, p.44; P02852, p.1-2.

<sup>221</sup> 1D00093, p.7; P02842, p.1-4; [REDACTED]. *Cross-reference* Section II.D.2(a)(iv)a-b; Section II.E.4(d)(ii)-(iv); Section II.F.5(b)(i).

<sup>222</sup> P00166, p.1-2; P02360, p.7.

<sup>223</sup> P02360, p.2-3,5-6,9-11. *See* P02600, p.10-12; [REDACTED].

<sup>224</sup> [REDACTED]; SLIŠKOVIĆDejan:T.88(11-Jul-2018); [REDACTED].

<sup>225</sup> SLIŠKOVIĆDejan:P02538, para.20; [REDACTED].

<sup>226</sup> RFJ-150:T.17-18(22-May-2018); P02596, p.24; P00258, p.11; KRSMANOVIĆDragoslav:1D00384, para.57.

<sup>227</sup> [REDACTED]; [REDACTED].

<sup>228</sup> [REDACTED]; RFJ-150:T.20(22-May-2018).

<sup>229</sup> P00842, p.1-3; KRSMANOVIĆDragoslav:T.15(3-Oct-2019); P02360, p.18-19; [REDACTED].

<sup>230</sup> [REDACTED].

<sup>231</sup> P00849, p.5,8,11.

<sup>232</sup> P00256(00:10:08-00:10:15), p.5.

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**KARAGIĆ, Slobodan aka KARAGA**<sup>233</sup>

59. [REDACTED],<sup>234</sup> KARAGIĆ was chief of military police in Doboj.<sup>235</sup> KARAGIĆ reported to BOŽOVIĆ<sub>(DB)</sub>,<sup>236</sup> who appointed him to run the Doboj “Vila” camp.<sup>237</sup> He led a Red Berets group [REDACTED].<sup>238</sup> KARAGIĆ was “a criminal, even before the war”<sup>239</sup> and led his unit in crimes against non-Serbs in Doboj.<sup>240</sup> KARAGIĆ appears, with his unit, on Doboj CSB paylists.<sup>241</sup> In June 1992, KARAGIĆ’s unit committed crimes related to the expulsion of the non-Serb civilian population from Teslić.<sup>242</sup>

**KOJIĆ, Ilija**

60. KOJIĆ worked for the SerbianDB from summer 1990 until the end of the Indictment period, always under the Accused’s authority, as set out in Section II.D.1(b).

61. [REDACTED], KOJIĆ worked closely with KOSTIĆ<sub>(DB)</sub>—[REDACTED]<sup>243</sup>—to coordinate the transfer and distribution of weapons, and, later on, to supervise the establishment and operations of police structures in SAO-SBWS.<sup>244</sup> He was subsequently appointed to high-level positions, becoming the first SAO-SBWS TO Commander in July 1991 (including during the Dalj attack),<sup>245</sup> and SAO-SBWS Minister of Defence in September 1991, in which position the Minister of Interior observed KOJIĆ and STANIŠIĆ “had their own arrangements”.<sup>246</sup> In both positions, KOJIĆ had authority over the SAO-SBWS TO while retaining authority over police matters.<sup>247</sup> As Minister of Defence, KOJIĆ

<sup>233</sup> [REDACTED].

<sup>234</sup> [REDACTED]. [REDACTED].

<sup>235</sup> HADŽOVIĆEdin:P02024, p.8.

<sup>236</sup> [REDACTED]. *Cross-reference* Section II.E.4(c)(ii).

<sup>237</sup> [REDACTED]; RFJ-165:T.17(29-May-2018).

<sup>238</sup> THEUNENSReynaud:P01980, p.494; P02367, p.4; [REDACTED]; [REDACTED]; [REDACTED].

<sup>239</sup> HADŽOVIĆEdin:P02008, p.3.

<sup>240</sup> [REDACTED]; RFJ-165:T.26(29-May-2018); [REDACTED]; HADŽOVIĆEdin:P02009, p.4; HADŽOVIĆEdin:P02022, p.2; HADŽOVIĆEdin:T.11-12(28-Mar-2018); [REDACTED]; [REDACTED]. *Cross-reference* Section III.C.4(a)(d).

<sup>241</sup> [REDACTED]; P02016, p.9; P02371; RFJ-165:T.80-82(30-May-2018). *See also* HADŽOVIĆEdin:P02011,T.2235-2236.

<sup>242</sup> *Cross-reference* Section II.F.4(b)(ii)c.iv.

<sup>243</sup> [REDACTED]; [REDACTED].

<sup>244</sup> *Cross-reference* Section II.E.3(a)(i); Section II.E.3(a)(iv)b; Section II.F.2(d)(i)-(iii).

<sup>245</sup> [REDACTED]; SAVIĆBorivoje:T.65-66(13-Sep-2017); [REDACTED]. *Cross-reference* Section II.F.2(h)(i).

<sup>246</sup> BOGUNOVIĆBorislav:P02720, T.5982,5985-5986; P00454; [REDACTED];[REDACTED].

<sup>247</sup> [REDACTED]; [REDACTED]; [REDACTED]. *See also* [REDACTED]; [REDACTED]; [REDACTED];[REDACTED]; BOGUNOVIĆNebojša:T.39(4-Sep-2019).

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had authority to make appointments to strategic positions within the SAO-SBWS government and TO.<sup>248</sup>

62. After the RSK's formation, KOJIĆ was appointed as one of MARTIĆ's Assistant Ministers of the Interior<sup>249</sup>—a position he held until the end of the war.<sup>250</sup> [REDACTED].<sup>251</sup> KOJIĆ continuously exercised immense influence in SBWS, effectively acting as the RSK Minister of the Interior in MARTIĆ's absence.<sup>252</sup> [REDACTED].<sup>253</sup>

63. In 1995, KOJIĆ participated in the preparatory meetings for the Trnovo/Treskavica operation, [REDACTED] to deploy [REDACTED] the Scorpions and the SDG, under MIJOVIĆ<sub>(DB)</sub>'s command.<sup>254</sup>

**KORF, Goran**

64. KORF, “a SMUP reservist”,<sup>255</sup> was part of the Unit—known as “Grey Wolves”—that committed crimes against non-Serbs in Bosanski Šamac, commanded by CRNI<sub>(DB)</sub> and DEBELI<sub>(DB)</sub> from April 1992.<sup>256</sup>

**KOSTIĆ, Radoslav aka RADE**<sup>257</sup>

65. Throughout the Indictment period, STANIŠIĆ and SIMATOVIĆ exercised authority over KOSTIĆ—officially a SerbianDB operative from December 1990 until his death on 21 November 1994<sup>258</sup>—and used him to effect their contributions to the CCP in Croatia and BiH.<sup>259</sup>

66. In December 1990, KOSTIĆ helped SIMATOVIĆ bring weapons to Knin.<sup>260</sup> A few months later, the SerbianDB sent him to SBWS to help organise police structures. By

<sup>248</sup> P00583; RFJ-113:T.29-31(26-Sep-2017); P00584.

<sup>249</sup> RFJ-113:T.50-51(27-Sep-2017); [REDACTED]; [REDACTED]; ĐUKIĆPetar:T.10(21-Jan-2020).

<sup>250</sup> [REDACTED].

<sup>251</sup> [REDACTED].

<sup>252</sup> ĐUKIĆPetar:T.10(21-Jan-2020); [REDACTED].

<sup>253</sup> [REDACTED]. [REDACTED].

<sup>254</sup> *Cross-reference* Section II.F.5(b)(iii)a. *See also* P03525, p.2; P02333; STEVANOVIĆObad:T.52(30-Sep-2020).

<sup>255</sup> P02031, p.4.

<sup>256</sup> [REDACTED]; P02048, p.1; [REDACTED]; P02031, p.2; P02714. *Cross-reference* Section II.D.2(a)(iii)a.

<sup>257</sup> [REDACTED].

<sup>258</sup> P00522, p.6,21-24,64-67.

<sup>259</sup> KRSMANOVIĆDragoslav:T.8-9(1-Oct-2019). *Cross-reference* Section II.D.1(b); Section II.E.3(a)(i),(iv)b-c; Section II.F.2; Section II.F.3(a)-(d); Section II.F.4(b)(i)b.i.

<sup>260</sup> [REDACTED]. *Cross-reference* Section II.E.3(a)(i).



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summer 1991, he was the *de facto* head of all police forces in SBWS,<sup>261</sup> playing a key role in arming SBWS Serbs, in close cooperation with KOJIĆ<sub>(DB)</sub> and [REDACTED].<sup>262</sup>

67. By late summer 1991, KOSTIĆ was in Baranja organising police structures.<sup>263</sup> KOSTIĆ [REDACTED]<sup>264</sup> and [REDACTED].<sup>265</sup>[REDACTED],<sup>266</sup> and possessed a permit signed by BOGDANOVIĆ allowing him to cross the Serbian border with an armed group.<sup>267</sup> He [REDACTED] and established and oversaw Baranja's Serb police structures, including the Beli Manastir-DB.<sup>268</sup> [REDACTED].<sup>269</sup> He coordinated with PAVLOVIĆ<sub>(DB)</sub> [REDACTED] to arm Zvornik Serb Forces and was instrumental in bringing ARKAN and PAVLOVIĆ<sub>(DB)</sub> to Zvornik.<sup>270</sup>

68. After RSK's formation, KOSTIĆ was appointed one of MARTIĆ's Assistant Ministers of the Interior.<sup>271</sup> Around then, STANIŠIĆ moved KOSTIĆ to SIMATOVIĆ's 2<sup>nd</sup> Administration.<sup>272</sup> Along with STANIŠIĆ, KOSTIĆ attended the RSK Security Day Celebration on 5 July 1993.<sup>273</sup> [REDACTED].<sup>274</sup> In September 1994, STANIŠIĆ prevented an attempt to remove KOSTIĆ from his position.<sup>275</sup>

69. KOSTIĆ died in November 1994 during Pauk while on duty for the SerbianDB.<sup>276</sup> STANIŠIĆ and co-JCE members BOGDANOVIĆ, KERTES, BADŽA, and ARKAN attended his funeral.<sup>277</sup> The Accused named the Unit's training centre after him: the "Radoslav KOSTIĆ Centre".<sup>278</sup>

<sup>261</sup> [REDACTED]; [REDACTED]; [REDACTED]; OFS-23:T.2-3(17-Sep-2020). *Cross-reference* Section II.F.2(d).

<sup>262</sup> *Cross-reference* Section II.E.3(a)(iv)b; Section II.F.2(d)(ii).

<sup>263</sup> *Cross-reference* Section II.F.2.

<sup>264</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>265</sup> [REDACTED].

<sup>266</sup> [REDACTED].

<sup>267</sup> [REDACTED]; [REDACTED]; BOGUNOVIĆNebojša:T.23(3-Sep-2019).

<sup>268</sup> *Cross-reference* Section II.F.2(d)(iii).

<sup>269</sup> *Cross-reference* Section II.F.2(f)(ii)c.

<sup>270</sup> *Cross-reference* Section II.D.2(b)(iv); Section II.E.3(a)(iv)c; Section II.F.4(b)(i)b.i; Section II.F.4(b)(i)b.iii.

<sup>271</sup> RFJ-113:T.50-51(27-Sep-2017); ĐUKIĆPetar:T.10(21-Jan-2020); [REDACTED].

<sup>272</sup> P00522, p.32-33; P03195, p.5.

<sup>273</sup> [REDACTED]; P00229; P00010(00:00:19-00:00:24).

<sup>274</sup> [REDACTED].

<sup>275</sup> P03818("NRDB" followed by "Jovica" is handwritten at the top of the report); DRAČAAco:T.35-36,40(3-Dec-2019)(confirming that "NRDB" means that the report was to be sent to STANIŠIĆ as head of the SerbianDB). *See* AnnexF, p.1-2.

<sup>276</sup> P00522, p.53; [REDACTED]; KRSMANOVIĆDragoslav:1D00406, p.1.

<sup>277</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>278</sup> P00256(00:08:22-00:09:02), p.3-4,12; [REDACTED];[REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

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**KRSMANOVIĆ, Dragoslav aka KRSMAN<sup>279</sup>**

70. Previously a SerbianJB-PJM commander,<sup>280</sup> KRSMANOVIĆ joined the Unit in 1993 when PRODANIĆ<sub>(DB)</sub>'s 8<sup>th</sup> Administration and TEPAVČEVIĆ<sub>(DB)</sub> invited him to help formalise the Unit as the JATD.<sup>281</sup> He was Assistant Commander handling logistics, [REDACTED].<sup>282</sup>

71. KRSMANOVIĆ sent requests for operative checks of Unit members<sup>283</sup> [REDACTED].<sup>284</sup>

72. KRSMANOVIĆ oversaw the Unit's preparations prior to Pauk in November 1994, [REDACTED].<sup>285</sup>

73. Between June and October 1995, SDG and Scorpions members communicated with KRSMANOVIĆ when going to the Unit's camp at Pajzoš for supplies and other equipment.<sup>286</sup>

74. KRSMANOVIĆ received SerbianDB payments in [REDACTED]-1995.<sup>287</sup> In 1995, KRSMANOVIĆ became the Unit's Deputy Commander, and remained in that position until he was appointed KOSTIĆ Centre Chief in 1998.<sup>288</sup> KRSMANOVIĆ received awards for his activities in the Unit in 1996.<sup>289</sup>

**KUŠIĆ, Njegoslav aka NJEGOS<sup>290</sup>**

75. KUŠIĆ was a Unit member [REDACTED],<sup>291</sup> and held an official RSK-MUP ID despite no apparent connection to Croatia/RSK.<sup>292</sup> He served [REDACTED] under BOŽOVIĆ<sub>(DB)</sub> at the Ozren camp in 1992,<sup>293</sup> and under MIJOVIĆ<sub>(DB)</sub> in Bratunac in 1993.<sup>294</sup>

<sup>279</sup> KRSMANOVIĆDragoslav:T.8(3-Oct-2019).

<sup>280</sup> P02357, p.6.

<sup>281</sup> KRSMANOVIĆDragoslav:1D00384, para.22; [REDACTED].

<sup>282</sup> [REDACTED]; [REDACTED]; KRSMANOVIĆDragoslav:T.43(24-Sep-2019); [REDACTED]; P02357, p.6.

<sup>283</sup> E.g. [REDACTED]; P00265, p.10.

<sup>284</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>285</sup> [REDACTED]; [REDACTED]; P00820, p.17.

<sup>286</sup> [REDACTED]; RFJ-150:T.20(22-May-2018).

<sup>287</sup> AnnexE.1.

<sup>288</sup> P02357, p.6.

<sup>289</sup> P02357, p.48; P00849, p.6,8,11.

<sup>290</sup> P02852, p.1.

<sup>291</sup> [REDACTED].

<sup>292</sup> Cross-reference Section II.D.2(a)(ii)a. [REDACTED]; P02852, p.1; P01941, p.10.

<sup>293</sup> Cross-reference Section II.E.4(c)(ii); Section II.F.4(b)(ii)c.ii-iii. P01172; P01171; P01173; P01950; [REDACTED]; [REDACTED]; P02834, p.42.

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[REDACTED].<sup>295</sup> He received SerbianDB payments in 1993 [REDACTED],<sup>296</sup> and was honoured for his activities with the Unit in 1996.<sup>297</sup>

**KUJUNDŽIĆ, Jovan**

76. KUJUNDŽIĆ joined the Unit in Knin in October 1991 and went to Ležimir on 4 November 1991.<sup>298</sup> He was with the Unit at Ležimir by February 1992.<sup>299</sup> He later moved to Pajzoš, and became IKM Pajzoš Commander by 11 June 1992.<sup>300</sup> KUJUNDŽIĆ held an official RSK-MUP ID despite no apparent connection to Croatia/RSK, and remained at Pajzoš, driving a SMUP car,<sup>301</sup> after the Unit took on the RSK-MUP-JPN nomenclature in June 1992.<sup>302</sup>

**KUJUNDŽIĆ, Predrag aka Predo**<sup>303</sup>

77. KUJUNDŽIĆ—an Ozren-trained Red Beret—led a notorious paramilitary group called Predo's Wolves during the Doboj operations and subsequent crimes in 1992.<sup>304</sup> Predo's Wolves were based on Mt. Ozren<sup>305</sup> trained by Unit members,<sup>306</sup> and wore red berets.<sup>307</sup> KUJUNDŽIĆ looted non-Serb property<sup>308</sup> and participated in the Perčin's Disco human shield murders.<sup>309</sup>

**LAČEVIĆ, Ranko**

78. LAČEVIĆ joined the Unit in January 1993, and went to Bratunac where he was an instructor under MIJOVIĆ<sub>(DB)</sub>.<sup>310</sup> He participated in combat operations in Skelani, Osmache,

<sup>294</sup> Cross-reference Section II.E.4(d)(iii). P02852, p.1; P02834, p.42.

<sup>295</sup> [REDACTED].

<sup>296</sup> AnnexE.1.

<sup>297</sup> P00849, p.5,11-12.

<sup>298</sup> P02715, p.12,18-19.

<sup>299</sup> P02715, p.20.

<sup>300</sup> P02715, p.15-16.

<sup>301</sup> P02715, p.14.

<sup>302</sup> Cross-reference Section II.D.2(a)(ii)a. P00553, p.30-31; P02715, p.6.

<sup>303</sup> HADŽOVIĆEdin:T.34(28-Mar-2018); P02367, p.4.

<sup>304</sup> HADŽOVIĆEdin:P02024, p.6; P02376; [REDACTED]. Cross-reference Section II.E.4(c)(ii).

<sup>305</sup> [REDACTED]; HADŽOVIĆEdin:P02009, para.3.

<sup>306</sup> Cross-reference Section II.E.4(c)(ii). P02367, p.4; [REDACTED].

<sup>307</sup> HADŽOVIĆEdin:T.34(28-Mar-2018); HADŽOVIĆEdin:P02011, T.2315.

<sup>308</sup> P02376; [REDACTED].

<sup>309</sup> HADŽOVIĆEdin:P02024, p.10; HADŽOVIĆEdin:T.15(28-Mar-2018); HADŽOVIĆEdin:P02009, para.3.

<sup>310</sup> P01941, p.3; P01940. Cross-reference Section II.E.4(d)(iii).

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Bratunac, and Zvornik, among others, before “returning” to Tara camp in August 1993.<sup>311</sup> He received SerbianDB payments in [REDACTED]-1995.<sup>312</sup>

**LAZAREVIĆ, Predrag aka LAKI**<sup>313</sup>

79. LAKI was among the Unit members **SIMATOVIĆ** personally briefed and deployed to take over Bosanski Šamac in April 1992 under ĐORĐEVIĆ<sub>(DB)</sub>’s command.<sup>314</sup> He beat detainees at detention centres in Bosanski Šamac<sup>315</sup> and participated in the Crkvina massacre of at least 16 non-Serbs.<sup>316</sup>

**LAZIĆ, Dragan**

80. LAZIĆ worked [REDACTED] for the SerbianDB at least from July 1991,<sup>317</sup> when he helped organise the SAO-SBWS-TO and police.<sup>318</sup> [REDACTED].<sup>319</sup> [REDACTED].<sup>320</sup>

81. LAZIĆ “had strong ties with” the SerbianDB in eastern Slavonia [REDACTED] as head of the VukovarSUP in October 1991 [REDACTED].<sup>321</sup> On 4 December 1991, HADŽIĆ appointed LAZIĆ to the Executive Council of Vukovar municipality.<sup>322</sup> He received a plaque at the RSK-MUP Security Service Day, along with, *inter alia*, KOJIĆ<sub>(DB)</sub> and STANIŠIĆ.<sup>323</sup>

**LEMIĆ, Milenko**

82. LEMIĆ was a SerbianDB operative in CRDB Novi Sad engaged in SAO-SBWS throughout the Indictment period.<sup>324</sup> [REDACTED].<sup>325</sup> [REDACTED].<sup>326</sup> [REDACTED],<sup>327</sup> [REDACTED] [REDACTED].<sup>328</sup> [REDACTED].<sup>329</sup>

<sup>311</sup> P01941, p.3; P01940.

<sup>312</sup> AnnexE.1.

<sup>313</sup> LUKAČDragan:P02731, p.25.

<sup>314</sup> P01953, p.2-3. *Cross-reference* Section II.D.2.(a)(iii)a; Section II.F.4(b)(ii)a.iv; Section III.C.3(a)-(c).

<sup>315</sup> LUKAČDragan:P02731, p.25; LUKAČDragan:P02732, T.1687-1688; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. *See* AF1131. *Cross-reference* Section III.C.3(b).

<sup>316</sup> *Cross-reference* Section III.C.3(c).

<sup>317</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P00589; [REDACTED].

<sup>318</sup> P00519, p.1.

<sup>319</sup> [REDACTED]; [REDACTED].

<sup>320</sup> [REDACTED]; [REDACTED].

<sup>321</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P00580.

<sup>322</sup> P00478; SAVIČBorivoje:P00449, para.208.

<sup>323</sup> P00589.

<sup>324</sup> P03782; P02816.

<sup>325</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>326</sup> [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>327</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

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**LONČAR, Nikola aka BAMBI**<sup>330</sup>

83. LONČAR joined the Unit in 1991,<sup>331</sup> and was at Ležimir by December 1991.<sup>332</sup> [REDACTED].<sup>333</sup> [REDACTED].<sup>334</sup>

84. LONČAR was in Doboj under BOŽOVIĆ<sub>(DB)</sub>,<sup>335</sup> [REDACTED].<sup>336</sup> [REDACTED].<sup>337</sup>

85. [REDACTED],<sup>338</sup> and was honoured in 1996.<sup>339</sup> During the KOSTIĆ Centre ceremony, he was introduced to MILOŠEVIĆ as a “Unit’s veteran officer.”<sup>340</sup>

**MAJSTOROVIĆ, Slobodan**

86. MAJSTOROVIĆ established barricades in Krajina under MARTIĆ in 1990.<sup>341</sup> Having trained at Golubić, he was an original Unit member, joining in May 1991, and remained in the Unit’s “reserve force” until May 2001.<sup>342</sup> MAJSTOROVIĆ participated in operations in Krajina, SBWS, and BiH, where the Unit committed crimes expelling non-Serbs. By April 1992, he was with the Unit in Ilok. He trained at Mt. Tara in November 1993.<sup>343</sup> MAJSTOROVIĆ received SerbianDB payments in [REDACTED]1995.<sup>344</sup>

**MANDINIĆ, Nebojša**

87. Nebojsa MANDINIĆ was [REDACTED]<sup>345</sup> and linked to what BABIĆ called the “parallel structure”,<sup>346</sup> through which MILOŠEVIĆ, STANIŠIĆ, and SIMATOVIĆ advanced the CCP in Krajina.<sup>347</sup> He was one of the main organisers of the Serb rebellion in

<sup>328</sup> [REDACTED]; [REDACTED];[REDACTED];[REDACTED]; [REDACTED]; [REDACTED];[REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>329</sup> [REDACTED]; [REDACTED];[REDACTED]; [REDACTED].

<sup>330</sup> [REDACTED]; [REDACTED]; P00849, p.8.

<sup>331</sup> P00260, p.23,30; [REDACTED]; [REDACTED].

<sup>332</sup> P00260, p.23,30.

<sup>333</sup> [REDACTED]; [REDACTED]. *See also* [REDACTED].

<sup>334</sup> [REDACTED]; [REDACTED]. [REDACTED].

<sup>335</sup> P01171, p.2; P01172; P01173; P01950. *Cross reference* Section II.D.2(a)(iii)c; Section II.F.4(b)(ii)c.ii-iii.

<sup>336</sup> [REDACTED]; [REDACTED];[REDACTED]; [REDACTED]. [REDACTED].

<sup>337</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>338</sup> [REDACTED].

<sup>339</sup> P00849, p.5,8,9.

<sup>340</sup> P00256(00:11:16-00:11:20), p.4,7; [REDACTED].

<sup>341</sup> P02864, p.7. *Cross-reference* Section II.F.1(a)(i)c.

<sup>342</sup> P02864, p.6-7,14-15,21-24,27-29,33-35,38,43,46-47,63-64; NIELSENChristian:P00850, para.227. *Cross-reference* Section II.D.2(a)(vi)b.

<sup>343</sup> P02864, p.7,14,38,46-47,64.

<sup>344</sup> AnnexE.1.

<sup>345</sup> [REDACTED].

<sup>346</sup> BABIĆMilan:P01246, T.13491-13492. *See also* P00382, p.1; [REDACTED].

<sup>347</sup> *Cross-reference* Section II.E.1(b).

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the Krajina, [REDACTED].<sup>348</sup> MANDINIĆ was involved in weapon shipments from Serbia to Krajina in 1990 and 1991 and, together with the Accused's Krajina-proxy ORLOVIĆ<sub>(DB)</sub>, coordinated with JCE members MARTIĆ, BABIĆ, and ARKAN to organise these shipments and distribute weapons in the Krajina.<sup>349</sup> [REDACTED].<sup>350</sup>

**MEDAKOVIĆ, Saša**

88. MEDAKOVIĆ was [REDACTED]Unit member.<sup>351</sup> He participated in the attacks on Ljubovo,<sup>352</sup> and on Glina/Struga under Captain DRAGAN<sub>(DB)</sub>.<sup>353</sup> [REDACTED].<sup>354</sup> [REDACTED].<sup>355</sup> He died [REDACTED].<sup>356</sup> The SerbianDB [REDACTED] sent money to his parents in 1994 [REDACTED].<sup>357</sup> In 1993, MARTIĆ gave a speech at Golubić dedicating a memorial to MEDAKOVIĆ, describing him as a "legendary hero".<sup>358</sup> The SerbianDB posthumously honoured MEDAKOVIĆ in 1996.<sup>359</sup>

**MEDIĆ Slobodan aka BOCA**<sup>360</sup>

89. MEDIĆ commanded the Scorpions.<sup>361</sup> He received orders from and reported directly to the Accused, and MRGUD<sub>(DB)</sub>, was his immediate superior.<sup>362</sup> The relationship between MEDIĆ and the Accused is discussed in Section II.D.2(c) of the Brief.

90. In June/July 1995, MEDIĆ led the Scorpions in the Trnovo operation under MIJOVIĆ<sub>(DB)</sub>'s command.<sup>363</sup> He ordered the Scorpions to execute six Bosnian Muslim men and boys from Srebrenica,<sup>364</sup> and to film the killings.<sup>365</sup>

<sup>348</sup> [REDACTED]; [REDACTED]; [REDACTED]. See also e.g. [REDACTED]; P03746, p.4-5; P03857, p.1-3; P00382, p.1. Cross-reference Section II.F.1(a)(i)c.

<sup>349</sup> P03746, p.4-5; P00382, p.1-2; P00384, p.2; [REDACTED]; NOVAKOVIĆStojan:T.15(6-Oct-2020); NOVAKOVIĆStojan:T.4-5,9-11(8-Oct-2020); [REDACTED]. See also [REDACTED].

<sup>350</sup> [REDACTED]. [REDACTED].

<sup>351</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>352</sup> 2D00897(01:24:55-01:29:37).

<sup>353</sup> P00271(00:00:00-00:00:58), p.1-2; [REDACTED]. Cross-reference Section II.F.1(c)(ii)a-b.

<sup>354</sup> [REDACTED].

<sup>355</sup> [REDACTED]; [REDACTED].

<sup>356</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>357</sup> P00208, p.2-3. Cross-reference Section II.D.2(a)(vi)c; AnnexE.1; AnnexE.4.

<sup>358</sup> P00214; [REDACTED]; [REDACTED]

<sup>359</sup> P00849, p.5,13.

<sup>360</sup> [REDACTED].

<sup>361</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P00849, p.2. Cross-reference Section II.D.2(c).

<sup>362</sup> STOPARIĆGoran:P00796, para.82; STOPARIĆGoran:T.62-63(8-Nov-2017); [REDACTED]; [REDACTED]; P00815, p.1-2.

<sup>363</sup> [REDACTED]; [REDACTED]; P01081, p.22-23,27,46,104-105. Cross-reference Section II.F.5(iii)(a).

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**MIJOVIĆ, Vasilije aka VASO/VASA**<sup>366</sup>

91. MIJOVIĆ joined the Unit in [REDACTED]<sup>367</sup> and served in command positions throughout the Indictment period.<sup>368</sup> Like many prominent Unit members, he had RSK-MUP and SMUP IDs,<sup>369</sup> as well as a BiH-MUP ID in 1992.<sup>370</sup>

92. MIJOVIĆ commanded a Unit detachment in Baranja in autumn 1991,<sup>371</sup> before playing a key role in the Unit's operations in BiH in 1992-1993. [REDACTED],<sup>372</sup> and frequently travelled to Belgrade to collect weapons, ammunition, and fuel for the Unit in Brčko and the VRS.<sup>373</sup> In early 1993, following contacts between **SIMATOVIĆ** and Obrad STEVANOVIĆ, MIJOVIĆ provided instructors for training of SerbianJB-PJMs at Tara.<sup>374</sup> Soon after, the Accused sent MIJOVIĆ to Bratunac, where he established a training camp and commanded the Bratunac Red Berets.<sup>375</sup>

93. [REDACTED]<sup>376</sup> [REDACTED].<sup>377</sup> In June/July 1995, MIJOVIĆ led the SMUP forces (Scorpions, SDG, and *Plavi* Brigade), in Trnovo/Treskavica.<sup>378</sup> STEVANOVIĆ confirmed that MIJOVIĆ was not operating on behalf of the SerbianJB at any time in 1995.<sup>379</sup> [REDACTED].<sup>380</sup> MIJOVIĆ claimed he was personally sent to Baranja by MILOŠEVIĆ and STANIŠIĆ, and was under **SIMATOVIĆ**'s protection.<sup>381</sup>

94. A VJ report on paramilitary units on RSK territory since 1991 concluded that MIJOVIĆ's group of up to 300 "well-armed and equipped" members was "officially a MUP

<sup>364</sup> [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:P00798, para.12; [REDACTED]; STOPARIĆGoran:T.27(8-Nov-2017). *Cross-reference* Section III.C.5.

<sup>365</sup> See AF1239; STOPARIĆGoran:P00798, para.9-10; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>366</sup> [REDACTED].

<sup>367</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>368</sup> [REDACTED]; [REDACTED]; P02852, p.1; P02834, p.44; [REDACTED]; [REDACTED]; [REDACTED]; P00552; P00544, p.1; P00553, p.13-14. *Cross-reference* Section II.D.2(a)(vi)b.

<sup>369</sup> [REDACTED]; P00285, p.1-4; NIELSENChristian:P00850, para.195. See [REDACTED]. *Cross-reference* Section II.D.2(a)(ii)-(ii)a.

<sup>370</sup> P00285, p.5-6.

<sup>371</sup> *Cross-reference* Section II.D.2(a)(i); Section II.F.2(f)(ii)c.

<sup>372</sup> [REDACTED].

<sup>373</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>374</sup> STEVANOVIĆObrad:T.54-56(22-Sep-2020). *Cross-reference* Section II.D.2(a)(iv)a; Section II.E.4(d)(iv).

<sup>375</sup> [REDACTED]; P02852, p.1-2. *Cross-reference* Section II.D.2(a)(iv)a; Section II.E.4(d)(iii).

<sup>376</sup> [REDACTED].

<sup>377</sup> [REDACTED].

<sup>378</sup> *Cross-reference* Section II.F.5(b)(iii).

<sup>379</sup> STEVANOVIĆObrad:T.66(3-Sep-2020).

<sup>380</sup> *Cross-reference* Section II.D.2(a)(v); Section II.F.5(b)(v).

<sup>381</sup> P00545, p.4-5. See [REDACTED]; P00553, p.18(**SIMATOVIĆ** is referred to as "F" in the MUP Belgrade. The name of his secretary was Slada).



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special unit [...] directly connected to the [SerbianDB]”, and noted its involvement in activities such as looting, killing, and rape.<sup>382</sup>

95. [REDACTED].<sup>383</sup> The SerbianDB paid per diems to MIJOVIĆ from [REDACTED] through December 1995, [REDACTED].<sup>384</sup>

96. MIJOVIĆ maintained a close professional relationship with the Accused after the Indictment period. He [REDACTED],<sup>385</sup> and was present at the KOSTIĆ Centre ceremony where he was introduced to MILOŠEVIĆ as a Unit’s “veteran officer.”<sup>386</sup>

**MILANOVIĆ, Milan aka MRGUD**

97. MRGUD was an “indisputable” SerbianDB “collaborator”,<sup>387</sup> and the “intermediary” commander of the Scorpions.<sup>388</sup>

98. MRGUD had direct, personal links with the Accused from at least early 1992 onwards. He attended meetings, held telephone conversations and reported to STANIŠIĆ.<sup>389</sup> [REDACTED].<sup>390</sup> [REDACTED].<sup>391</sup> [REDACTED],<sup>392</sup> [REDACTED].<sup>393</sup> His intimacy with the Accused, [REDACTED] and senior players in SAO-SBWS, including KOJIC<sub>(DB)</sub>,<sup>394</sup> is confirmed by the fact that he was deeply involved in control, finance, and governance of SBWS,<sup>395</sup> particularly when he participated in the mass expulsion of SVK intelligence officers from the region by the SerbianDB<sup>396</sup> [REDACTED].<sup>397</sup>

99. As a senior SAO-SBWS Minister from 1991 onwards he worked closely with HADZIC<sup>398</sup> and ARKAN<sup>399</sup> and ensured the funding of the Erdut Training centre.<sup>400</sup> As

<sup>382</sup> P01974, p.1-2; THEUNENSReynaud:T.45(7-Mar-2018); NIELSENChristian:P00850, para.217,220. See P03273, p.2; P00544, p.1; [REDACTED].

<sup>383</sup> [REDACTED].

<sup>384</sup> [REDACTED]; AnnexE.1.

<sup>385</sup> [REDACTED].

<sup>386</sup> P00256(00:09:50-00:09:56), p.4-5. See [REDACTED].

<sup>387</sup> STOPARIĆGoran:T.62-63(8-Nov-2017); SAVIĆBorivoje:T.65(12-Sep-2017).

<sup>388</sup> [REDACTED]; STOPARIĆGoran:T.62-63,66(8-Nov-2017). Cross-reference Section II.D.2(c).

<sup>389</sup> [REDACTED]; [REDACTED]; [REDACTED]; SAVIĆBorivoje:T.65-66(12-Sep-2017).

<sup>390</sup> [REDACTED]; [REDACTED]; See also [REDACTED].

<sup>391</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>392</sup> [REDACTED].

<sup>393</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>394</sup> P03269.

<sup>395</sup> [REDACTED]; [REDACTED]; P00527.

<sup>396</sup> P03090, p.3,4,9.

<sup>397</sup> [REDACTED]; [REDACTED].

<sup>398</sup> P00485, p.2,6,8; [REDACTED]; SAVIĆBorivoje:T.65-66(12-Sep-2017).

<sup>399</sup> [REDACTED]; P02349; P02350.

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SAO-SBWS/RSK Deputy Minister of Defence, he was a founder,<sup>401</sup> arms and general supplier,<sup>402</sup> and intermediary commander<sup>403</sup> of the Scorpions<sup>404</sup> led by Slobodan MEDIĆ<sub>(DB)</sub>,<sup>405</sup> and ultimately under SerbianDB control.<sup>406</sup> He was present on occasion with the Scorpions during Pauk,<sup>407</sup> during which they committed hideous crimes.<sup>408</sup> Despite this, he was subsequently involved in deploying the Scorpions to Trnovo where they committed the crimes charged in the Indictment.<sup>409</sup> Until the very end of the war, MRGUD, together with ARKAN and KOJIĆ<sub>(DB)</sub>, under SerbianDB command, pursued the CCP to maintain an ethnically cleansed SBWS.<sup>410</sup>

**MILJKOVIĆ, Slobodan aka LUGAR<sup>411</sup>**

100. In 1991, LUGAR—a member of DEBELI<sub>(DB)</sub>'s SRS volunteers in SBWS—served in the SAO-SBWS TO and police under BADŽA, participating in ethnic cleansing<sup>412</sup> and combat operations alongside ARKAN's men and the JNA.<sup>413</sup> In March 1992, LUGAR trained [REDACTED],<sup>414</sup> then at Pajzoš,<sup>415</sup> formally joining the Unit around April 1992, before deploying into Bosanski Šamac.<sup>416</sup> LUGAR abused and murdered Bosanski Šamac non-Serb civilians, including leading the Crkvina massacre of at least 16 non-Serbs.<sup>417</sup> [REDACTED].<sup>418</sup> [REDACTED].<sup>419</sup>

<sup>400</sup> 1D00046.

<sup>401</sup> [REDACTED].

<sup>402</sup> [REDACTED]; [REDACTED]; ĐJUKIĆ Petar: T.43 (16-Dec-2019).

<sup>403</sup> [REDACTED]

; [REDACTED].

<sup>404</sup> [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆ Goran: T.49 (7-Nov-2017); STOPARIĆ Goran: P00796, para.81; [REDACTED]; [REDACTED].

<sup>405</sup> [REDACTED]; STOPARIĆ Goran: P00796, para.77; P00842, p.1-2; STEVANOVIĆ Obrad: T.37 (23-Sep-2020); [REDACTED].

<sup>406</sup> Cross-reference Section II.D.2(c).

<sup>407</sup> 1D00037, p.93 (emphasis added); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>408</sup> JURIĆ Frano: P01211, para.8, 12-14; [REDACTED]; [REDACTED].

<sup>409</sup> [REDACTED]; 2D00093, p.11-12; [REDACTED]. Cross-reference Section III.C.5.

<sup>410</sup> P02349; P02350; P00842, p.1-2.

<sup>411</sup> P02040, p.1.

<sup>412</sup> Cross-reference Section II.F.2(f)-(g); Section III.B.2(b)(iii).

<sup>413</sup> [REDACTED]; [REDACTED]; P03742, p.1, 4, 6; P02040, p.1; P02047. [REDACTED].

<sup>414</sup> Cross-reference Section II.D.2.(a)(ii)a; [REDACTED]. P02040, p.1; [REDACTED].

<sup>415</sup> Cross-reference Section II.D.2(a)(iii)a; Section II.E.4(b)(iii); Section II.F.4(b)(ii)a.ii.

<sup>416</sup> Cross-reference Section II.D.2(a)(iii)a; Section II.F.4(b)(ii)a.iv. P02040, p.1; [REDACTED]. See AF1059; [REDACTED].

<sup>417</sup> See e.g. [REDACTED]; LUKAČ Dragan: P02731, p.24-28, 35; LUKAČ Dragan: P02732, T.1679-1688, 1697-1698; TIHIĆ Sulejman: P01867, p.3; TIHIĆ Sulejman: P01865, p.7-11; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. Cross-reference Section III.C.3(b)-(c).

<sup>418</sup> [REDACTED].

<sup>419</sup> [REDACTED].

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101. Despite committing numerous crimes as a Unit member, the SerbianDB only began monitoring LUGAR after he returned to Serbia in 1993, after becoming concerned that his “extremist” behaviour constituted a threat to the regime.<sup>420</sup> [REDACTED].<sup>421</sup>

[REDACTED]<sup>422</sup>

102. [REDACTED].<sup>423</sup> [REDACTED]<sup>424</sup> [REDACTED].<sup>425</sup>

103. [REDACTED]<sup>426</sup>—[REDACTED].<sup>427</sup> [REDACTED].<sup>428</sup> [REDACTED].<sup>429</sup>

104. [REDACTED],<sup>430</sup> [REDACTED].<sup>431</sup>

**MOMČILOVIĆ, Dušan**

105. MOMČILOVIĆ was a “double-hatter” embedded by the Accused in SAO-Krajina/RSK-MUP.<sup>432</sup> He worked for the SerbianDB 4<sup>th</sup> Administration from 1991, while also serving in the SAO-Krajina/RSK-MUP—from 26 June 1991 to 5 August 1995—*inter alia* as head of the GlinaSUP, and later as commander of the RSK-MUP special purpose units.<sup>433</sup> He was wounded while commanding an RSK-MUP-PJM in the Posavina Corridor operations, where he was present on SerbianDB “official duty”.<sup>434</sup>

106. In March 1992, MOMČILOVIĆ confirmed that the RSK-MUP was sending 400 men to Belgrade to help deal with the “uproar” in Yugoslavia, and while there, they would be subordinated to the RSK-MUP and SMUP.<sup>435</sup>

107. MOMČILOVIĆ was promoted to a commanding position in the JATD on 1 May 1994,<sup>436</sup> and individuals who served under him in the RSK later joined the Unit.<sup>437</sup> In late

<sup>420</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. See P02050.

<sup>421</sup> [REDACTED].

<sup>422</sup> [REDACTED]; [REDACTED].

<sup>423</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>424</sup> [REDACTED]; [REDACTED].

<sup>425</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>426</sup> [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>427</sup> [REDACTED]; [REDACTED]. [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>428</sup> [REDACTED]; [REDACTED].

<sup>429</sup> [REDACTED]. [REDACTED]; [REDACTED]; [REDACTED]. See [REDACTED]; [REDACTED].

<sup>430</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>431</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>432</sup> Cross-reference Section II.F.1(b)(i)(b).

<sup>433</sup> P00160, p.30,39,42,47,50; P03732, p.1-2,6,13. See [REDACTED]; RJS-07:T.25(28-Aug-2019); P02358, p.12-13; P00159, p.1-2; DRAČAAco:T.14-15(3-Dec-2019). Cross-reference Section II.F.1(c)(ii)a.

<sup>434</sup> P00160, p.30; P03732, p.2,4,6,13; P02358, p.12-13.

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spring or summer 1995, MOMČILOVIĆ was deployed to Petrova Gora to participate in Pauk.<sup>438</sup> He received SerbianDB payments in [REDACTED]-1995.<sup>439</sup> After the Indictment period, he remained in the Unit as a JSO commander.<sup>440</sup>

108. MOMČILOVIĆ was honoured in 1996 for his wartime activities with the Unit.<sup>441</sup> STANIŠIĆ presented him with an award during the KOSTIĆ Centre ceremony,<sup>442</sup> and he was on a list of “Ministry Employees” to be awarded with a Security Service Plaque by the RSK-MUP.<sup>443</sup>

**OBRADOVIĆ, Ljubomir**

109. OBRADOVIĆ joined the Unit in December 1991.<sup>444</sup> He was at Ležimir in February 1992.<sup>445</sup> He remained at Pajzoš during the period after the Unit took on the RSK-MUP nomenclature.<sup>446</sup> He was killed on 9 April 1993 in Osmače while participating in the Podrinje operations under BOŽOVIĆ<sub>(DB)</sub> and JOVANOVIĆ<sub>(DB)</sub>.<sup>447</sup> The SerbianDB made payments to his wife,<sup>448</sup> and posthumously honoured him in 1996.<sup>449</sup>

**OLUIĆ, Dragan**

110. OLUIĆ, an original Unit member, manned barricades in Krajina in 1990, then went to Golubić in May 1991.<sup>450</sup> [REDACTED]<sup>451</sup> In 1991, he participated in the Unit’s combat operations in Krajina (Ljubovo, Plitvice, Glina, Kostajnica, Northern Dalmatia) then assisted in seizing Bapska and Šarengrad, securing Pajzoš.<sup>452</sup> In 1992, OLUIĆ was deployed to operations in eastern Bosnia.<sup>453</sup> OLUIĆ received SerbianDB payments in 1993-1995.<sup>454</sup> He

<sup>435</sup> P03051. See P03050, p.1-2.

<sup>436</sup> P00160, p.30; P02358, p.5; KRSMANOVIĆDragoslav:T.55(2-Oct-2019).

<sup>437</sup> E.g. 2D00324, p.51,55; [REDACTED]; P02358, p.1.

<sup>438</sup> [REDACTED].

<sup>439</sup> AnnexE.1.

<sup>440</sup> P00160, p.30.

<sup>441</sup> P00849, p.5,8,9,11.

<sup>442</sup> P00256(00:45:46-00:45:53), p.27.

<sup>443</sup> P00589, p.1-2.

<sup>444</sup> 1D00093, p.2,3,4.

<sup>445</sup> 1D00093, p.8. Cross-reference Section II.D.2(a)(ii).

<sup>446</sup> P03238. Cross-reference Section II.D.2(a)(ii)a.

<sup>447</sup> 1D00093, p.3,4,7; [REDACTED]. Cross-reference Section II.D.2(a)(iv); Section II.F.4(b)(iv).

<sup>448</sup> 1D00093, p.4. See AnnexE.1; AnnexE.4. Cross-reference Section II.D.2(a)(vi)c.

<sup>449</sup> P00849, p.5,13.

<sup>450</sup> P00261, p.5,13; [REDACTED]; [REDACTED]; [REDACTED]; NIELSENChristian:P00850, para.193. Cross-reference Section II.F.1(a)(i)c. See [REDACTED].

<sup>451</sup> [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>452</sup> P00261, p.5; [REDACTED]; NIELSENChristian:P00850, para.193. Cross-reference Section II.D.2(a)(i); Section II.F.1(c)(ii); Section II.F.2(f)(ii).

<sup>453</sup> P00261, p.5; NIELSENChristian:P00850, para.193.

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received an award in 1996 for his activities with the Unit,<sup>455</sup> and attended the KOSTIĆ Centre ceremony in 1997.<sup>456</sup>

**OPAČIĆ, Goran aka KLEMPO**<sup>457</sup>

111. OPAČIĆ, a police officer from Benkovac, took part in operating the barricades on 17 August 1990.<sup>458</sup> In 1992, at the ceremony marking the two-year anniversary of the Log Revolution, OPAČIĆ gave an inflammatory speech, threatening to kill traitors.<sup>459</sup>

112. In early 1991, OPAČIĆ went to Golubić, where he trained under Captain DRAGAN<sub>(DB)</sub>.<sup>460</sup> [REDACTED].<sup>461</sup> On 3 May 1991, he participated in actions to “disarm citizens of Croat ethnicity in Vrhpolje and Potkonje”,<sup>462</sup> which caused the Croat populations to flee.<sup>463</sup> Following his training, OPAČIĆ returned to the Benkovac police station,<sup>464</sup> and later commanded the Benkovac SJB in the brutal attack on Škabrnja on 18 and 19 November 1991.<sup>465</sup> Members of his group participated in the killings there.<sup>466</sup>

113. In 1992, OPAČIĆ participated in the Posavina Corridor operations under MARTIĆ’s command.<sup>467</sup> Between 1993 and 1994, he trained at the *Alfa* camp under Captain DRAGAN<sub>(DB)</sub>.<sup>468</sup> Following Operation Storm, OPAČIĆ joined the *Poskok* Detachment.<sup>469</sup> He and RAIĆ<sub>(DB)</sub> engaged in criminal activities together.<sup>470</sup> OPAČIĆ received SerbianDB payments in 1995.<sup>471</sup>

114. During his testimony, OPAČIĆ repeatedly denied his relationship to the Unit.<sup>472</sup> STANIŠIĆ’s acknowledgement of OPAČIĆ’s service to the SerbianDB was, however, apparent during the KOSTIĆ Centre ceremony. He was introduced to MILOŠEVIĆ as a

<sup>454</sup> AnnexE.1.

<sup>455</sup> P00849, p.5,11.

<sup>456</sup> [REDACTED]; [REDACTED]; P00256(00:10:56-00:11:03), p.7; [REDACTED].

<sup>457</sup> P03086, p.1.

<sup>458</sup> P01972, p.5; [REDACTED].

<sup>459</sup> P00220(00:03:04-00:06:19); [REDACTED].

<sup>460</sup> [REDACTED].

<sup>461</sup> [REDACTED]; [REDACTED].

<sup>462</sup> P00232; [REDACTED].

<sup>463</sup> *Cross-reference* Section III.B.1(a).

<sup>464</sup> [REDACTED].

<sup>465</sup> [REDACTED]; BABIĆMilan:P01248, T.1601; BABIĆMilan:P01246, T.13406-13407. *See* AF274.

<sup>466</sup> P00301; P00219. *See* 2D00392; 2D00393.

<sup>467</sup> [REDACTED]; [REDACTED].

<sup>468</sup> P03467, p.4-5; P03452, p.5; P02361, p.2.

<sup>469</sup> [REDACTED]; P01972; [REDACTED]; [REDACTED]; [REDACTED]. *Cross-reference* Section II.D.2(a)(v).

<sup>470</sup> 2D00391.

<sup>471</sup> AnnexE.1.

<sup>472</sup> [REDACTED].

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Unit's "veteran officer",<sup>473</sup> and **STANIŠIĆ** personally gave him an award, spontaneously embracing him. **STANIŠIĆ** remarked that OPAČIĆ's service was worthy of the highest regard.<sup>474</sup>

**ORLOVIĆ, Dušan aka DULE**<sup>475</sup>

115. ORLOVIĆ, a member of the parallel structure,<sup>476</sup> operated in Krajina at the Accused's behest from August 1990.<sup>477</sup> He [REDACTED],<sup>478</sup> and met with **SIMATOVIĆ** when he came to Krajina in May 1991.<sup>479</sup> ORLOVIĆ later played a key role, under **SIMATOVIĆ**'s leadership, in the transfer and distribution of weapons from Serbia to Krajina,<sup>480</sup> and also assisted ARKAN in weapons transfers.<sup>481</sup>

116. ORLOVIĆ was one of MARTIĆ's close associates, and in January 1991, MARTIĆ appointed him—[REDACTED]—to become the head of the newly-formed SAO-KrajinaDB.<sup>482</sup> Despite his formal subordination to MARTIĆ, ORLOVIĆ reported directly to the Accused,<sup>483</sup> and [REDACTED].<sup>484</sup> ORLOVIĆ was one of the persons through whom the SerbianDB controlled the SAO-KrajinaDB.<sup>485</sup> In August 1991, **STANIŠIĆ** intervened to preclude BABIĆ's attempt to remove ORLOVIĆ from the SAO-KrajinaDB<sup>486</sup>

117. [REDACTED].<sup>487</sup>

118. Following the RSK formation, ORLOVIĆ became head of the RSK-DB, and was appointed one of MARTIĆ's Assistant Ministers.<sup>488</sup> In mid-1992, as most of his senior agents were passing information to **STANIŠIĆ**, MARTIĆ disbanded part of the RSK-DB, and removed ORLOVIĆ from his position.<sup>489</sup> Immediately thereafter, **STANIŠIĆ** moved

<sup>473</sup> P00256(00:09:57-00:10:03), p.4-5.

<sup>474</sup> P00256(00:46:00-00:47:12), p.27.

<sup>475</sup> [REDACTED]; DRAČAAco:T.20(26-Nov-2019).

<sup>476</sup> Cross-reference Section II.E.1(b).

<sup>477</sup> BABIĆMilan:P01246, T.12918-12920,12928;13491-13492; BABIĆMilan:P01248, T.1391; [REDACTED]; [REDACTED]. Cross-reference Section II.E.3(a)(i); Section II.F.1(a)(i)c; Section II.F.1(b)(i)b; Section II.F.1(c)(i); Section II.F.1(c)(ii)c; Section II.F.3(b).

<sup>478</sup> [REDACTED]. [REDACTED].

<sup>479</sup> [REDACTED]; DRAČAAco:T.75(27-Nov-2019); DRAČAAco:T.30(26-Nov-2019).

<sup>480</sup> Cross-reference Section II.F.1(a)(i)c; Section II.E.3(a)(i). [REDACTED]; [REDACTED].

<sup>481</sup> Cross-reference Section II.F.1(a)(i)c.

<sup>482</sup> [REDACTED]; BABIĆMilan:P01246, T.12928,13497; [REDACTED]; [REDACTED].

<sup>483</sup> [REDACTED]; [REDACTED]; RFJ-066:T.32(10-Jul-2017); [REDACTED]; BABIĆMilan:P01246, T.12928.

<sup>484</sup> [REDACTED]; [REDACTED].

<sup>485</sup> [REDACTED]; BABIĆMilan:P01248, T.1417-1418.

<sup>486</sup> P01307; BABIĆMilan:P01248, T.1417-1418,1420.

<sup>487</sup> [REDACTED]. [REDACTED]; [REDACTED].

<sup>488</sup> P03439, p.4; 1D00503, p.2.

<sup>489</sup> [REDACTED] RFJ-066:T.31-32(10-Jul-2017); [REDACTED] 1D00503, p.2.

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ORLOVIĆ to **SIMATOVIĆ**'s 2<sup>nd</sup> Administration.<sup>490</sup> **SIMATOVIĆ** signed ORLOVIĆ's performance reviews for 1993-1995.<sup>491</sup>

119. In May 1996, he was awarded for his involvement with the Unit.<sup>492</sup> At the KOSTIĆ Centre ceremony, ORLOVIĆ was introduced to MILOŠEVIĆ as a Unit's "veteran officer".<sup>493</sup>

**PAJIĆ, Miloš**

120. SerbianDB associate<sup>494</sup> PAJIĆ served as head of the SAO-Krajina/RSK-DB centre for Kordun and Banija while simultaneously working for the SerbianDB.<sup>495</sup> He reported directly to **STANIŠIĆ** on the political and security situation in Banija and Kordun.<sup>496</sup> In November 1994, he attended the coordination meeting chaired by **STANIŠIĆ** on the forthcoming Operation Pauk.<sup>497</sup>

**PAJIĆ, Tošo**

121. SerbianDB associate<sup>498</sup> PAJIĆ was formally employed by SAO-Krajina/RSK structures, serving *inter alia* as police chief in Vojnić, head of the VojnićSUP, and one of MARTIĆ's Assistant Ministers of Interior, while simultaneously working for the Accused and SerbianDB.<sup>499</sup> [REDACTED].<sup>500</sup> [REDACTED],<sup>501</sup> [REDACTED].<sup>502</sup> [REDACTED].<sup>503</sup>

**PEJIĆ, Marko aka PEJA**<sup>504</sup>

122. PEJIĆ, SDG Deputy Commander,<sup>505</sup> participated in operations in Bijeljina, Zvornik and Brčko.<sup>506</sup> He was a key perpetrator of heinous crimes against non-Serbs following the

<sup>490</sup> P00270, p.23-24(p.18(BCS))(signed by **STANIŠIĆ**); AnnexF, p.3-4; P03195, p.6. See P00270, p.5-6,11,27-28; DRAČAAco:T.32(3-Dec-2019); RFJ-066:T.31-32(10-Jul-2017); P00233, p.9; [REDACTED]; P00342; [REDACTED]; P02980; [REDACTED]; P00344.

<sup>491</sup> P00270, p.39-40,43-49(p.24,26-28(BCS))(signed by **SIMATOVIĆ**); AnnexF, p.5-6.

<sup>492</sup> P00849, p.5,8,9,12.

<sup>493</sup> P00256(00:09:44-00:09:50), p.4-5.

<sup>494</sup> Cross-reference Section II.F.1(b)(i)b.

<sup>495</sup> [REDACTED]; [REDACTED]; 2D00403; P00588, p.1; DRAČAAco:T.14(3-Dec-2019); P03421, p.1-5; P02358, p.10-15; [REDACTED]. See P00238(00:00:13-00:03:26); P00239; [REDACTED].

<sup>496</sup> P03421, p.1.

<sup>497</sup> [REDACTED]; NOVAKOVIĆRadenko:T.52-53,58-59(18-Sep-2019). Cross-reference Section II.F.5(b)(ii)a.

<sup>498</sup> Cross-reference Section II.F.1(b)(i)b; Section II.F.3(b).

<sup>499</sup> [REDACTED]; [REDACTED]; P00588, p.1; P00589, p.1; 1D01422; DRAČAAco:T.61-62(27-Nov-2019); DRAČAAco:T.14(3-Dec-2019); [REDACTED]; P03421, p.4; 1D00039; P00159, p.2; [REDACTED].

<sup>500</sup> [REDACTED]; [REDACTED]. See [REDACTED]; 2D00403; P00588, p.1; P00589.

<sup>501</sup> [REDACTED].

<sup>502</sup> [REDACTED].

<sup>503</sup> NOVAKOVIĆRadenko:T.52-53,58(18-Sep-2019); [REDACTED]. [REDACTED].

<sup>504</sup> [REDACTED].



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Zvornik takeover, forcing Muslim prisoners to perform oral sex on each other before he killed them.<sup>507</sup> [REDACTED].<sup>508</sup> [REDACTED].<sup>509</sup>

**PETROVIĆ, Dragan aka KAJMAN**<sup>510</sup>

123. PETROVIĆ was an SDG founding member.<sup>511</sup> He participated in operations in [REDACTED], and later in the Treskavica/Trnovo, [REDACTED].<sup>512</sup> During Trnovo, PETROVIĆ led ARKAN's men—known as the Kajman Detachment—in operations,<sup>513</sup> under MIJOVIĆ<sub>(DB)</sub>'s command.<sup>514</sup> [REDACTED].<sup>515</sup> He received SerbianDB payments in [REDACTED]-1995.<sup>516</sup>

**PILIPOVIĆ, Nikola**

124. PILIPOVIĆ, an original Unit member,<sup>517</sup> manned barricades in Lika, Krajina in August 1990.<sup>518</sup> In June 1991, he joined the Unit at Golubić, where he trained before moving to the Knin fortress.<sup>519</sup> In Krajina, PILIPOVIĆ participated in the Unit's operations in Dalmatia, Lika and Banija, including those in Glina, Lovinac, Plitvice, Skradin, and Korenica.<sup>520</sup>

125. By December 1991, PILIPOVIĆ was at Ležimir/Pajzoš as an instructor.<sup>521</sup> IVANOVIĆ<sub>(DB)</sub> evaluated PILIPOVIĆ in 1992—he knew him from “combat operations in the Krajina and the Baranja operation”—recommending him for the active force.<sup>522</sup> [REDACTED].<sup>523</sup>

126. Between March and June 1992, PILIPOVIĆ participated in operations in Baranja, including Bilje, then went with the Unit to BiH to participate in the Posavina Corridor

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<sup>505</sup> [REDACTED].

<sup>506</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>507</sup> [REDACTED]; [REDACTED]. [REDACTED].

<sup>508</sup> [REDACTED].

<sup>509</sup> [REDACTED].

<sup>510</sup> [REDACTED].

<sup>511</sup> [REDACTED]; NOVAKOVIĆStojan:T.17-18(8-Oct-2020); P03858, p.1 (No.7).

<sup>512</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>513</sup> [REDACTED]; [REDACTED]. See NOVAKOVIĆStojan:T.53-54(6-Oct-2020); P03525, p.2.

<sup>514</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P02356.

<sup>515</sup> [REDACTED].

<sup>516</sup> Annex E.1; [REDACTED].

<sup>517</sup> [REDACTED]; [REDACTED].

<sup>518</sup> P00258, p.2-3,12,28,32; [REDACTED]. Cross-reference Section II.F.1(a)(i)c.

<sup>519</sup> P00258, p.7-8,12,28; [REDACTED].

<sup>520</sup> P00258, p.12,15,32.

<sup>521</sup> P00260, p.32; P00258, p.2-3,28-29,30,32.Cross-reference Section II.E.4(b)(ii)-(iii).

<sup>522</sup> P00258, p.32.

<sup>523</sup> [REDACTED]; [REDACTED]. [REDACTED].

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operations.<sup>524</sup> Shortly thereafter, he went to Ilok until his deployment to Skelani in February 1993, and the Mt. Tara camp from August 1993 onwards.<sup>525</sup> He continued as a Unit member, eventually returning to Pajzoš in 1995, where he commanded a training group and participated in the Unit's joint combat operations in SBWS.<sup>526</sup> [REDACTED].<sup>527</sup>

127. PILIPOVIĆ received SerbianDB payments in 1993-1995.<sup>528</sup> At the KOSTIĆ Centre ceremony, PILIPOVIĆ was introduced to MILOŠEVIĆ as a Unit's "veteran officer" and was presented with an award by STANIŠIĆ.<sup>529</sup>

**POKRAJAC, Uroš**

128. Double-hatter POKRAJAC<sup>530</sup> [REDACTED]. In late 1990, STANIŠIĆ sent him to Knin with SIMATOVIĆ.<sup>531</sup> [REDACTED].<sup>532</sup> In April 1991, POKRAJAC reported to the SMUP on radio communications needs in the Knin.<sup>533</sup> In May 1991, POKRAJAC [REDACTED], and delivered a convoy of Land Rovers to Golubić provided by SIMATOVIĆ.<sup>534</sup> POKRAJAC was also involved in arming Krajina Serbs.<sup>535</sup>

129. After MARTIĆ disbanded the RSK-DB, [REDACTED] POKRAJAC to Knin to be MARTIĆ's special advisor, [REDACTED].<sup>536</sup> Although he had a good relationship with MARTIĆ, he [REDACTED], and continued to take instructions from STANIŠIĆ while serving as MARTIĆ's special advisor.<sup>537</sup> From this position POKRAJAC was able to issue orders to the RSK-MUP.<sup>538</sup> [REDACTED].<sup>539</sup>

130. In May 1995, POKRAJAC visited Grahovo in order to prepare, along with the SMUP's highest authorities, the arrival, reception and accommodation of a SMUP special

<sup>524</sup> P00258, p.12,15,32. *Cross-reference* Section II.D.2(a)(i); Section II.D.2(iii); Section II.F.2(f)(ii); Section II.F.2(h)(ii); Section II.F.4(b)(ii).

<sup>525</sup> P00258, p.13,20; [REDACTED]. *Cross-reference* Section II.D.2(a)(ii)a; Section II.D.2(a)(iv)a; Section II.E.4(b)(iii); Section II.E.4(d)(ii) and (iv).

<sup>526</sup> P00258, p.6,11; [REDACTED]; [REDACTED]; [REDACTED]. *Cross-reference* Section II.D.2(a)(v); Section II.F.5(b)(v).

<sup>527</sup> [REDACTED]; [REDACTED]; LUČIĆ Miroslav: T.27-29(9-Sep-2020).

<sup>528</sup> Annex E.1.

<sup>529</sup> P00256(00:09:28-00:09:32)(00:10:30-00:10:35),(00:44:41-00:44:53), p.4,6,27; [REDACTED]; [REDACTED].

<sup>530</sup> *Cross-reference* Section II.F.3(b).

<sup>531</sup> [REDACTED].

<sup>532</sup> [REDACTED]; [REDACTED].

<sup>533</sup> P00242.

<sup>534</sup> [REDACTED]; [REDACTED]. *Cross-reference* Section II.E.4(a)(i); Section II.F.1(b)(i)a.

<sup>535</sup> [REDACTED]; [REDACTED]; P00834, p.3. *Cross-reference* Section II.E.3(a)(i).

<sup>536</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P00337; P00339; P00338.

<sup>537</sup> [REDACTED]; P03522.

<sup>538</sup> E.g. P00339.

<sup>539</sup> [REDACTED]. [REDACTED].

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unit.<sup>540</sup> He warned the local authorities that ARKAN's men could be part of this unit if there were not enough local volunteers.<sup>541</sup>

**POPOVIĆ, Branko aka PAVLOVIĆ, Marko**

131. POPOVIĆ aka Marko PAVLOVIĆ<sup>542</sup> was a SerbianDB associate who operated under the authority of the Accused, as detailed in Section II.D.1(c). Under KOSTIĆ<sub>(DB)</sub>'s supervision, PAVLOVIĆ played a significant role arming Zvornik Serbs in 1991-1992 until the Zvornik takeover, after which PAVLOVIĆ officially became Zvornik TO Commander and assumed command over the myriad of predominantly Serbian paramilitary forces in Zvornik. He held extraordinary authority in Zvornik. As Zvornik TO Commander, he led and was responsible for horrific crimes and the organised removal of non-Serbs from Zvornik.<sup>543</sup> PAVLOVIĆ was arrested in [REDACTED] in Zvornik in August 1992, but [REDACTED].<sup>544</sup>

**PRODANIĆ, Milan**

132. PRODANIĆ was a SerbianDB official throughout the Indictment period, directly subordinated to [REDACTED] STANIŠIĆ.<sup>545</sup> Appointed by STANIŠIĆ to head the 8<sup>th</sup> Administration,<sup>546</sup> PRODANIĆ was in charge of SerbianDB personnel and finance issues, and was authorised to sign documents relating to personnel matters on behalf of STANIŠIĆ.<sup>547</sup>

133. PRODANIĆ played a pivotal role in arming Serb Forces in RS and RSK from at least 1991, meeting daily with STANIŠIĆ and TEPAVČEVIĆ<sub>(DB)</sub> to assess the military equipment and supply requirements of Serb Forces, and arranging convoys from Bubanj Potok to Croatia and BiH.<sup>548</sup>

134. In autumn of 1992, PRODANIĆ<sub>(DB)</sub>, together with FILIPOVIĆ<sub>(DB)</sub>, arranged CRNI<sub>(DB)</sub>'s second deployment to Bosanski Šamac.<sup>549</sup> In November 1992, STANIŠIĆ and

<sup>540</sup> P00340; P03522.

<sup>541</sup> P03521, p.4.

<sup>542</sup> [REDACTED]; [REDACTED]; [REDACTED]. See P01623, p.1; [REDACTED].

<sup>543</sup> Cross-reference Section II.F.4(a)(ii)c; Section II.F.4(b)(i)b.i; Section II.F.4(b)(i)b.iii-iv.

<sup>544</sup> P01622; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>545</sup> [REDACTED]; P02983, p.2; P02566, p.5-7.

<sup>546</sup> P02566, p.5-7.

<sup>547</sup> P02983, p.2; DRAGICEVIĆ Vlado:T.45(17-Oct-2019).

<sup>548</sup> Cross-reference Section II.E.3(a)(iii); [REDACTED]; P02983, p.2.

<sup>549</sup> [REDACTED]; P01953, p.2-3.

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PRODANIĆ<sub>(DB)</sub> met with the VRS to discuss whether CRNI<sub>(DB)</sub> would be allowed to continue operating in the Bosanski Šamac area.<sup>550</sup>

**PRODANOVIĆ, Milenko aka MUNGOS<sup>551</sup>**

135. PRODANOVIĆ was a Bratunac Red Berets member under MIJOVIĆ<sub>(DB)</sub>.<sup>552</sup> After MIJOVIĆ<sub>(DB)</sub> left the area, PRODANOVIĆ formed his own unit, the *Mungosi*, known to the Zvornik police for frequently violating law and order.<sup>553</sup> In 1995, PRODANOVIĆ was in Bilje as part of MIJOVIĆ<sub>(DB)</sub>'s Unit detachment.<sup>554</sup> PRODANOVIĆ and his unit, including former Bratunac Red Berets,<sup>555</sup> [REDACTED].<sup>556</sup>

**PUPOVAC, Nikola aka PUPE<sup>557</sup>**

136. PUPOVAC, an original Unit member, trained at Golubić, [REDACTED].<sup>558</sup> He was at Šamarica<sup>559</sup> and the Knin fortress<sup>560</sup> and participated in the attack on Ljubovo and the Glina police station in July 1991.<sup>561</sup> He also participated in the Unit's operations in Bapska, Ilok, and Šaregrad.<sup>562</sup> He was in Ležimir by December 1991<sup>563</sup> and in Ilok in April 1992.<sup>564</sup> He trained Milan LUKIĆ and members of his murderous paramilitary unit from Višegrad at the Pajzoš camp.<sup>565</sup> Following SIMATOVIĆ's instructions,<sup>566</sup> PUPOVAC established the Skelani camp with Unit instructors in June 1992.<sup>567</sup>

137. When the Accused formalised the Unit as the JATD, the SerbianDB requested a background check for PUPOVAC.<sup>568</sup> [REDACTED].<sup>569</sup> PUPOVAC received SerbianDB payments in [REDACTED]-1995.<sup>570</sup>

<sup>550</sup> P01988; P01989.

<sup>551</sup> P03508, p.1.

<sup>552</sup> P03242, p.2-3; P03508, p.1. See 1D00070, p.2. Cross-reference Section II.D.2(a)(iv)a; Section II.E.4(d)(iii).

<sup>553</sup> P03508, p.1.

<sup>554</sup> [REDACTED]. Cross-reference Section II.D.2(a)(v).

<sup>555</sup> P03242, p.2-3.

<sup>556</sup> [REDACTED]; [REDACTED].

<sup>557</sup> [REDACTED].

<sup>558</sup> [REDACTED]; [REDACTED]; P00265, p.9; [REDACTED]; [REDACTED].

<sup>559</sup> P03233.

<sup>560</sup> P00271; [REDACTED].

<sup>561</sup> 2D00897(01:24:55-01:29:37); P00271(00:20:40-00:21:15)(00:34:33-00:35:55), p.1-2; [REDACTED]; 1D00032; [REDACTED].

<sup>562</sup> [REDACTED].

<sup>563</sup> P00260, p.4.

<sup>564</sup> P00265, p.9.

<sup>565</sup> [REDACTED]. Cross-reference Section II.E.4(b)(iii).

<sup>566</sup> DERONJIĆ Miroslav: P01717, para.134-138.

<sup>567</sup> P03600, p.1; 2D00089, p.5; P03201, p.1. Cross-reference Section II.E.4(d)(ii).

<sup>568</sup> P00265, p.10.

<sup>569</sup> [REDACTED]; [REDACTED]. Cross-reference Section II.D.2(a)(vi)b.

<sup>570</sup> Annex E.1.

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138. PUPOVAC was awarded for his involvement with the Unit in 1996<sup>571</sup> and STANIŠIĆ presented him with another award at the KOSTIĆ Centre ceremony the next year.<sup>572</sup>

[REDACTED]

139. [REDACTED].<sup>573</sup> [REDACTED].<sup>574</sup>

**RADONJIĆ, Milan aka MEDO**<sup>575</sup>

140. A long-term SerbianDB employee,<sup>576</sup> RADONJIĆ was close to the Accused and linked to the Unit throughout the Indictment period. As of December 1990, he was assigned to the 4<sup>th</sup> Administration of the Belgrade Department,<sup>577</sup> which was involved in the SerbianDB's preparations for the war in Croatia.<sup>578</sup> In the summer of 1991, SIMATOVIĆ brought RADONJIĆ, to Golubić to assist Captain DRAGAN<sub>(DB)</sub> with the training.<sup>579</sup> Like SIMATOVIĆ and FILIPOVIĆ<sub>(DB)</sub>, RADONJIĆ was later "retroactively deployed" to Kosovo by STANIŠIĆ to conceal his activities in Croatia in 1991.<sup>580</sup> [REDACTED].<sup>581</sup>

141. RADONJIĆ helped STANIŠIĆ and SIMATOVIĆ to formalise the Unit as the JATD in the summer of 1993,<sup>582</sup> and became its Deputy Commander,<sup>583</sup> directly subordinated to SIMATOVIĆ.<sup>584</sup> STANIŠIĆ later signed a decision confirming RADONJIĆ's appointment to the JATD.<sup>585</sup> RADONJIĆ was second in the JATD command

<sup>571</sup> P00849, p.5,9,11.

<sup>572</sup> P00256(00:43:02-00:43:08), p.27.

<sup>573</sup> [REDACTED].

<sup>574</sup> [REDACTED].

<sup>575</sup> [REDACTED].

<sup>576</sup> P02297, p.7-8.

<sup>577</sup> P02297, p.20-23. *See also* P02297, p.16; P03195, p.21.

<sup>578</sup> P03194, p.5.

<sup>579</sup> [REDACTED]; RFJ-066:T.28-29(10-Jul-2017); RFJ-066:T.2(11-Jul-2017); [REDACTED]. *See also* [REDACTED]. *Cross-reference* Section II.E.4(a)(i).

<sup>580</sup> P02297, p.19; NIELSENChristian:T.47-48(14-Nov-2017); NIELSENChristian:P00850, para.86. *Cross-reference* Section II.B.3(b).

<sup>581</sup> [REDACTED].

<sup>582</sup> KRSMANOVIĆDragoslav:1D00384, para.22-23.

<sup>583</sup> KRSMANOVIĆDragoslav:1D00384, para.24; P02297, p.4(personnel decision confirming that RADONJIĆ was assigned to the post described in Article 37 ordinal number 2 of the Decision establishing the JATD); [REDACTED]; NIELSENChristian:T.42-43(14-Nov-2017); [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:P02538, para.11; [REDACTED]; PLAHUTADejan:T.23(21-Nov-2019); LUČIĆMiroslav:T.29-30(9-Sep-2020). *See also* P02297, p.1-3,13-15; P02645, p.1-3; [REDACTED]; NIELSENChristian:P00850, para.206-207.

<sup>584</sup> P02297, p.1(p.1(BCS))(RADONJIĆ's employee evaluation questionnaire—referred to as JATD Deputy Commander—was signed by SIMATOVIĆ as "head of the organisational unit"); AnnexF, p.6; [REDACTED]; NIELSENChristian:T.44(14-Nov-2017); SLIŠKOVIĆDejan:T.5(18-Jul-2018); [REDACTED]. *See also* [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.8(18-Jul-2018).

<sup>585</sup> P02297, p.14-15(p.13(BCS)); P02645, p.-1-2(p.1(BCS)); [REDACTED].

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structure after **SIMATOVIĆ**<sup>586</sup> and [REDACTED] had authority to act on **STANIŠIĆ**'s behalf when he was absent.<sup>587</sup> As JATD Deputy Commander, RADONJIĆ was also responsible for overseeing the Unit's reserve force.<sup>588</sup>

142. RADONJIĆ was often present at the Unit's training facilities. Together with KRSMANOVIĆ<sub>(DB)</sub>, he set up the JATD's base at Lipovica,<sup>589</sup> the offices of which he continued to use in [REDACTED] and 1995 as it functioned as a training camp.<sup>590</sup> RADONJIĆ [REDACTED]<sup>591</sup> and visited the Mt. Tara camp sometime between March and May 1995.<sup>592</sup>

143. In his capacity as Deputy Commander, RADONJIĆ signed many Unit documents,<sup>593</sup> including paylists<sup>594</sup> (which would then be initialled by **SIMATOVIĆ**),<sup>595</sup> [REDACTED] [REDACTED],<sup>596</sup> [REDACTED],<sup>597</sup> and a recommendation for the appointment of RAIĆ<sub>(DB)</sub>.<sup>598</sup> He received reports on the Unit's activities,<sup>599</sup> including their criminal activities,<sup>600</sup> and was in contact with RSK-DB chief DRAČA<sub>(DB)</sub>, who kept him informed about the events in the RSK.<sup>601</sup>

144. RADONJIĆ received SerbianDB payments in [REDACTED]-1995,<sup>602</sup> and was awarded in 1996 for his wartime activities with the Unit.<sup>603</sup>

<sup>586</sup> [REDACTED]; SLIŠKOVIĆDejan:T.5(18-Jul-2018).

<sup>587</sup> [REDACTED]. *See also* SLIŠKOVIĆDejan:T.8(18-Jul-2018).

<sup>588</sup> [REDACTED]; [REDACTED].

<sup>589</sup> KRSMANOVIĆDragoslav:1D00384, para.24.

<sup>590</sup> [REDACTED]; [REDACTED]; P02859, p.2.

<sup>591</sup> [REDACTED]; [REDACTED]. [REDACTED]; [REDACTED]; 2D00409, p.1,5; [REDACTED]. *See also* [REDACTED].

<sup>592</sup> SLIŠKOVIĆDejan:T.15-16(10-Jul-2018); [REDACTED].

<sup>593</sup> KRSMANOVIĆDragoslav:1D00384, para.41; [REDACTED]; [REDACTED]; P02359, p.6; P02591, p.4,8; P02590, p.8.

<sup>594</sup> [REDACTED]. *See e.g.* [REDACTED]; [REDACTED],[REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P02582, p.1; P02583, p.1; P02584, p.1; P02585, p.1; [REDACTED]; [REDACTED];[REDACTED].

<sup>595</sup> [REDACTED]. *See also* [REDACTED]; 1D00400.

<sup>596</sup> [REDACTED].

<sup>597</sup> [REDACTED].

<sup>598</sup> P00233, p.30-31.

<sup>599</sup> P00553, p.13-14,18.

<sup>600</sup> P02600, p.17-20; [REDACTED]; 2D00143; KRSMANOVIĆDragoslav:1D00406, p.1-2.

<sup>601</sup> DRAČAAco:T.40-41(3-Dec-2019); [REDACTED]. *See also* P03818, p.1.

<sup>602</sup> AnnexE.1.

<sup>603</sup> P02568, p.8; P00849, p.5,8,9,11. *See also* 2D00532, p.1.

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**RADOVANOVIĆ, Srećko aka DEBELI<sup>604</sup>**

145. Under BADŽA, DEBELI commanded a group of approximately 30 SRS volunteers, including LUGAR<sub>(DB)</sub>, in SBWS ethnic cleansing<sup>605</sup> and combat operations, with ARKAN's men and the JNA.<sup>606</sup>

146. In March 1992, Unit members trained DEBELI at [REDACTED] and Pajzoš, alongside Bosanski Šamac locals.<sup>607</sup> Upon completion of the training, DEBELI was among the group personally briefed and deployed by SIMATOVIĆ to take over Bosanski Šamac.<sup>608</sup> During the takeover, DEBELI was CRNI<sub>(DB)</sub>'s deputy and the chain of command went up to SIMATOVIĆ.<sup>609</sup>

147. After the JNA pulled out of BiH on 19 May 1992, the VRS 2<sup>nd</sup> Posavina Brigade was formed with CRNI<sub>(DB)</sub> as the commander<sup>610</sup> and DEBELI as his chief of staff.<sup>611</sup> They remained under the Accused's authority and commanders of the Pajzoš-trained Red Berets and Unit members in the area.<sup>612</sup>

**RADULOVIĆ, Predrag [REDACTED] aka MILOŠ<sup>613</sup>**

148. RADULOVIĆ aka Pile was an employee of the BiH-DB—and, after the RS-MUP was formed, the RS-SNB—in Banja Luka.<sup>614</sup> RADULOVIĆ participated in arming the Serbs in BiH and Slavonia before the outbreak of the conflict.<sup>615</sup> In July 1991, he was appointed Banja LukaDB liaison officer for contact with the SMUP.<sup>616</sup>

149. Through RADULOVIĆ, STANIŠIĆ controlled Serbs within the BiH-DB/RS-SNB.<sup>617</sup> Under the code name MILOŠ, RADULOVIĆ gathered intelligence, and reported directly to the Accused about the situation in RS, particularly around the Banja Luka Centre,

<sup>604</sup> [REDACTED]

<sup>605</sup> Cross-reference Section II.F.2(c)-(f)(ii)a; Section III.B.2(b)(iii).

<sup>606</sup> [REDACTED] P03742, p.1,4,6.

<sup>607</sup> Cross-reference [REDACTED]; Section II.E.4(b)(ii). [REDACTED].

<sup>608</sup> Cross-reference Section II.D.2(a)(iii)a; Section II.F.4(b)(ii)a.iv. [REDACTED]; [REDACTED]; [REDACTED]. See AF1059; AF1064.

<sup>609</sup> [REDACTED]; [REDACTED]; [REDACTED]; P02048, p.1; 1D00857. p.2.

<sup>610</sup> [REDACTED]; P02048, p.1; [REDACTED]. See AF1081.

<sup>611</sup> [REDACTED]; P02048, p.1; P03612, p.3.

<sup>612</sup> RFJ-035:T.8(18-Apr-2018); [REDACTED].

<sup>613</sup> Cross-reference Section II.F.4(a)(ii)b.ii.

<sup>614</sup> [REDACTED]; NIELSENChristian:T.2-3(15-Nov-2017).

<sup>615</sup> P00854.

<sup>616</sup> P00854, p.1; [REDACTED]. See 1D01319.

<sup>617</sup> Cross-reference Section II.F.4(a)(ii)b.ii.



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from at least July 1991,<sup>618</sup> until the end of 1994, when he was pressured to retire because of his ties to the SerbianDB.<sup>619</sup>

150. In October 1993, the RS-SNB praised RADULOVIĆ for his work cooperating with the SerbianDB.<sup>620</sup>

**RAIĆ<sup>621</sup>, Zoran aka GAVRAN<sup>622</sup>**

151. RAIĆ—SIMATOVIĆ's logistics man [REDACTED]<sup>623</sup>—worked simultaneously for the SerbianDB and the SAO-Krajina/RSK-DB.<sup>624</sup> RAIĆ started working for the SAO-KrajinaDB when it was formed in January 1991,<sup>625</sup> and was one of the persons through whom the Accused controlled the SAO-Krajina/RSK-DB.<sup>626</sup> He was an original Unit member, [REDACTED] in Golubić.<sup>627</sup> He was engaged with the Unit at [REDACTED] and Korenica,<sup>628</sup> and in Ležimir and Pajzoš from October 1991 to March 1992.<sup>629</sup> While being promoted through the ranks of the Unit, RAIĆ was committing crimes.<sup>630</sup>

152. Upon the RSK-DB's dissolution, RAIĆ was moved to the SerbianDB in Belgrade.<sup>631</sup> When the Accused formalised the Unit as the JATD, RAIĆ was working as JATD Assistant Commander.<sup>632</sup> During Pauk, operating directly under the Accused,<sup>633</sup> [REDACTED],<sup>634</sup> [REDACTED].<sup>635</sup> After Krajina fell, RAIĆ led the *Poskok* Detachment in Ilok.<sup>636</sup> RAIĆ received SerbianDB payments in 1993-1995.<sup>637</sup>

<sup>618</sup> [REDACTED]; 1D01442; P03178 ; [REDACTED]. *Cross-reference* Section II.F.4(a)(ii)b.ii.

<sup>619</sup> [REDACTED]. *See* P02380, p.4,6.

<sup>620</sup> P00854. *See* P03576, p.11.

<sup>621</sup> RAIĆ's name has occasionally been spelt RAJIĆ in the trial record. The correct spelling of his name is RAIĆ, as found on his SerbianDB Personnel Files (P00233 and P00234 (with one exception where it is spelt RAJIC)).

<sup>622</sup> P00849, p.8.

<sup>623</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>624</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>625</sup> P00233, p.9.

<sup>626</sup> [REDACTED].

<sup>627</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:P02538, para.3; [REDACTED].

<sup>628</sup> [REDACTED]; RFJ-066:T.40-42(10-Jul-2017).

<sup>629</sup> P00233, p.9; P00234, p.15,16; [REDACTED]; P00260, p.23-24.

<sup>630</sup> P00234, p.6-7,32-33; P00830, p.4

<sup>631</sup> RFJ-066:T.31-32(10-Jul-2017); P00234, p.15-16,24; P00233, p.9.

<sup>632</sup> [REDACTED]; P00233, p.28.

<sup>633</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>634</sup> [REDACTED].

<sup>635</sup> [REDACTED]; P02415(00:24:00-00:26:00); P00240; [REDACTED]; RFJ-066:T.29(10-Jul-2017); [REDACTED].

<sup>636</sup> [REDACTED]; P02865, p.1-2; P02870; P02871. *Cross-reference* Section II.D.2(a)(v).

<sup>637</sup> AnnexE.1.

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153. RAIĆ remained close to the Accused after the war. In January 1996, **SIMATOVIĆ** requested Serbian citizenship for RAIĆ, noting the he was a JATD employee.<sup>638</sup> In May 1996, RADONJIĆ<sub>(DB)</sub> signed a proposal to award RAIĆ with a pistol for his service in the JATD.<sup>639</sup> RAIĆ received an award for his activities with the Unit in 1996<sup>640</sup> and again in 1997—from **STANIŠIĆ**—during the KOSTIĆ Centre ceremony.<sup>641</sup>

**[REDACTED]**

154. [REDACTED]<sup>642</sup> [REDACTED].<sup>643</sup> [REDACTED].<sup>644</sup> [REDACTED].<sup>645</sup>

155. [REDACTED].<sup>646</sup> [REDACTED].<sup>647</sup> [REDACTED].<sup>648</sup>

**[REDACTED]**

156. [REDACTED].<sup>649</sup> [REDACTED].<sup>650</sup>

**[REDACTED]**

157. [REDACTED].<sup>651</sup> [REDACTED].<sup>652</sup> [REDACTED].<sup>653</sup> [REDACTED].<sup>654</sup>

158. [REDACTED].<sup>655</sup>

159. [REDACTED].<sup>656</sup>

**[REDACTED]**

160. [REDACTED].<sup>657</sup> [REDACTED]—[REDACTED].<sup>658</sup> [REDACTED].<sup>659</sup>  
 [REDACTED].<sup>660</sup> [REDACTED].<sup>661</sup> [REDACTED].<sup>662</sup>

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<sup>638</sup> P00234, p.28,29.

<sup>639</sup> [REDACTED].

<sup>640</sup> P00849, p.5,6,8,911.

<sup>641</sup> P00256(00:45:43-00:45:48)

<sup>642</sup> [REDACTED].

<sup>643</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>644</sup> [REDACTED].

<sup>645</sup> [REDACTED].

<sup>646</sup> [REDACTED]; [REDACTED].

<sup>647</sup> [REDACTED]. [REDACTED].

<sup>648</sup> [REDACTED]; [REDACTED].

<sup>649</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>650</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>651</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>652</sup> [REDACTED].

<sup>653</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>654</sup> [REDACTED]; [REDACTED]. [REDACTED]; [REDACTED].

<sup>655</sup> [REDACTED]; [REDACTED]. [REDACTED]; [REDACTED].

<sup>656</sup> [REDACTED]; [REDACTED].

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**ŠARE, Nenad**

161. According to ŠARE, he “participated in the war from the beginning of the barricades until the fall of the RSK.”<sup>663</sup> ŠARE manned the barricades in Krajina in 1990.<sup>664</sup> After completing his military training, he joined the JNA 9th Corps in October 1991,<sup>665</sup> which at the time coordinated the persecutory campaign in Krajina.<sup>666</sup> In February 1993, ŠARE went to Captain DRAGAN<sub>(DB)</sub>'s *Alfa* camp.<sup>667</sup>

162. In 1994, ŠARE transferred to the CIGO unit led by Nikola SIMIĆ<sub>(DB)</sub>.<sup>668</sup> He then joined the Unit's *Poskok* Detachment when it was formed in 1995, and trained at the Sova camp.<sup>669</sup> ŠARE's background report is initialled by *Poskok* Detachment Commander RAIĆ<sub>(DB)</sub>.<sup>670</sup> ŠARE was in Ilok in December 1995, where the *Poskok* Detachment regrouped after Operation Storm.<sup>671</sup> ŠARE received SerbianDB payments in 1995.<sup>672</sup>

**SAVIĆ, Ljubiša aka MAUZER**<sup>673</sup>

163. [REDACTED].<sup>674</sup> After training under ARKAN's SDG, he formed the Serbian National Guard—also known as MAUZER's Panthers.<sup>675</sup> MAUZER had “strong contacts” with the SerbianDB,<sup>676</sup> and [REDACTED].<sup>677</sup>

164. MAUZER's unit participated in the takeovers of Bijeljina alongside ARKAN's SDG,<sup>678</sup> Brčko,<sup>679</sup> and Zvornik,<sup>680</sup> [REDACTED],<sup>681</sup> the Podrinje Operation, particularly around Srebrenica,<sup>682</sup> and Operation Pauk.<sup>683</sup>

<sup>657</sup> [REDACTED]; [REDACTED].

<sup>658</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>659</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>660</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]

<sup>661</sup> [REDACTED].

<sup>662</sup> [REDACTED]; [REDACTED].

<sup>663</sup> P02870, p.1,19,23 .

<sup>664</sup> P02870, p.1. *Cross-reference* Section II.F.1(a)(i)c.

<sup>665</sup> P02870, p.1,3,19,21,23.

<sup>666</sup> *Cross-reference* Section II.F.1(c)(iii).

<sup>667</sup> P02870, p.1,3,4,19,21,23; [REDACTED].

<sup>668</sup> P02870, p.1,3,4,19,21, [REDACTED]. *Cross-reference* Section II.D.2(a)(v).

<sup>669</sup> P02870, p.1,3,4,18-20,23. *Cross-reference* Section II.D.2(a)(v).

<sup>670</sup> P02870, p.15(p.21(BCS); AnnexF, p.11. *Cross-reference* Section II.D.2(a)(v).

<sup>671</sup> P02870, p.23. *Cross-reference* Section II.D.2(a)(v).

<sup>672</sup> AnnexE.1.

<sup>673</sup> P01632, p.1.

<sup>674</sup> [REDACTED].

<sup>675</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>676</sup> 1D00036, p.76; P02889; MILOVANOVIĆManojlo:P02935, T.15410-15411,15517.

<sup>677</sup> [REDACTED]; [REDACTED].

<sup>678</sup> [REDACTED]; [REDACTED]; P00852, p.14.

<sup>679</sup> [REDACTED]; [REDACTED]; 1D00034; P00811.

<sup>680</sup> [REDACTED].

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**SIMIĆ, Nikola aka CIGO/CIGA<sup>684</sup>**

165. SIMIĆ joined the Unit in 1991.<sup>685</sup> He trained at Golubić under Captain DRAGAN<sub>(DB)</sub>,<sup>686</sup> and participated in the attack on the Glina police station.<sup>687</sup> He then went to [REDACTED],<sup>688</sup> before joining the Unit at Pajzoš.<sup>689</sup> He later served as an instructor at Captain DRAGAN<sub>(DB)</sub>'s *Alfa* camp,<sup>690</sup> and formed the CIGO unit comprised of men trained at the *Alfa* camp, and who ultimately joined the Unit's *Poskok* Detachment.<sup>691</sup> After the fall of Krajina, he returned to Ilok under RAIĆ<sub>(DB)</sub>.<sup>692</sup> He received SerbianDB payments in 1995.<sup>693</sup> He joined the JSO after 1995.<sup>694</sup> In 1996, he received an award for his Unit-related activities.<sup>695</sup>

**SIMOVIĆ, Goran [REDACTED]<sup>696</sup>**

166. [REDACTED].<sup>697</sup> [REDACTED].<sup>698</sup>

167. In 1995, SIMOVIĆ engaged in combat operations on the Eastern Slavonia frontline under DEBELI<sub>(DB)</sub>.<sup>699</sup> [REDACTED].<sup>700</sup>

**SLIŠKOVIĆ, Dejan**

168. SLIŠKOVIĆ was a JATD member from May 1994 until May/June 1995.<sup>701</sup> He trained at Lipovica<sup>702</sup> and Tara.<sup>703</sup> During Pauk, he was operational in Petrova Gora and

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<sup>681</sup> [REDACTED].

<sup>682</sup> P02060; [REDACTED]; [REDACTED]; P01944.

<sup>683</sup> [REDACTED]; P02655; [REDACTED].

<sup>684</sup> P02871, p.18; [REDACTED].

<sup>685</sup> P01986; P00260, p.4; [REDACTED].

<sup>686</sup> BOSNIĆMil:1D00236, para.59.

<sup>687</sup> P01986, p.1.

<sup>688</sup> [REDACTED]; RFJ-066:T.40-42(10-Jul-2017).

<sup>689</sup> [REDACTED]; P00260, p.4.

<sup>690</sup> BOSNIĆMil:1D00236, para.59; [REDACTED]; BABIĆMilan:P01246, T.13121-13123.

<sup>691</sup> Cross-reference Section II.D.2(a)(v).

<sup>692</sup> P02871, p.20-25. Cross-reference Section II.D.2(a)(v).

<sup>693</sup> AnnexE.1.

<sup>694</sup> P02871, p.4,9.

<sup>695</sup> P00849, p.5,8,9,11.

<sup>696</sup> [REDACTED].

<sup>697</sup> [REDACTED]. [REDACTED]. See also [REDACTED]; [REDACTED]; [REDACTED].

<sup>698</sup> [REDACTED]; [REDACTED]. [REDACTED].

<sup>699</sup> 1D01014, p.1.

<sup>700</sup> [REDACTED]; [REDACTED].

<sup>701</sup> [REDACTED]; SLIŠKOVIĆDejan:T.47-48(11-Jul-2018); [REDACTED].

<sup>702</sup> [REDACTED].

<sup>703</sup> SLIŠKOVIĆDejan:P02538, para.20; [REDACTED]; SLIŠKOVIĆDejan:T.47(11-Jul-2018); P02554; [REDACTED].

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Magarčevac, where he guarded **STANIŠIĆ** and **SIMATOVIĆ**'s offices.<sup>704</sup> He was also involved in some combat operations and observed the Unit targeting civilians.<sup>705</sup> [REDACTED].<sup>706</sup> Upon leaving the JATD, **SLIŠKOVIĆ** served with the 72<sup>nd</sup> Special Brigade until September 1995,<sup>707</sup> then joined **ARKAN**'s SDG in Erdut.<sup>708</sup>

**SPASOJEVIĆ, Predrag**

169. **SPASOJEVIĆ** joined the Unit in November 1991, and was in Ležimir in 1992.<sup>709</sup> He went to Bratunac in April 1992 to monitor events in the area, and introduced himself to the Serb leadership as from the SerbianDB.<sup>710</sup> He was an instructor at the Skelani camp, and recruited young men from Bratunac to attend the training.<sup>711</sup>

**[REDACTED]**<sup>712</sup>

170. [REDACTED].<sup>713</sup> [REDACTED].<sup>714</sup> [REDACTED].<sup>715</sup>

**SUBOTIĆ, Davor aka RIKI**<sup>716</sup>

171. **SUBOTIĆ**, an original Unit member, joined the Unit in 1991. After training at Golubić under Captain **DRAGAN**<sub>(DB)</sub>, [REDACTED].<sup>717</sup>

172. [REDACTED].<sup>718</sup> [REDACTED], **SUBOTIĆ** [REDACTED], and went to Doboj as **BOŽOVIĆ**<sub>(DB)</sub>'s deputy and [REDACTED].<sup>719</sup>

173. [REDACTED].<sup>720</sup> [REDACTED].<sup>721</sup> [REDACTED].<sup>722</sup> [REDACTED] [REDACTED].<sup>723</sup> **SUBOTIĆ** received SerbianDB payments in 1993-1995.<sup>724</sup>

<sup>704</sup> **SLIŠKOVIĆ**Dejan:P02538, para.7; [REDACTED]; **SLIŠKOVIĆ**Dejan:T.27-28(11-Jul-2018); **SLIŠKOVIĆ**Dejan:T.30-31(10-Jul-2018); [REDACTED].

<sup>705</sup> [REDACTED].

<sup>706</sup> [REDACTED].

<sup>707</sup> **SLIŠKOVIĆ**Dejan:T.47-48(11-Jul-2018); [REDACTED].

<sup>708</sup> **SLIŠKOVIĆ**Dejan:P02538, para.22; [REDACTED].

<sup>709</sup> P02839, p.1,4,8.

<sup>710</sup> **DERONJIĆ**Miroslav:P01717, para.131; **DERONJIĆ**Miroslav:P01718, T.1066,1071; P03600, p.1.

<sup>711</sup> **DERONJIĆ**Miroslav:P01717, para.132,140. *Cross-reference* Section II.E.4(d)(ii).

<sup>712</sup> [REDACTED].

<sup>713</sup> [REDACTED].

<sup>714</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>715</sup> [REDACTED]; [REDACTED].

<sup>716</sup> 1D00937.

<sup>717</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED]; [REDACTED].

<sup>718</sup> [REDACTED].

<sup>719</sup> *Cross-reference* Section II.D.2(a)(iii)c; Section II.E.4(c)(2); Section III.C.4. [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P01172; P01173, p.2; P01950; [REDACTED].

<sup>720</sup> [REDACTED].

<sup>721</sup> [REDACTED]. [REDACTED].

<sup>722</sup> [REDACTED].

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174. He received an award for his involvement with the Unit in 1996.<sup>725</sup> At the KOSTIĆ Centre ceremony, he was introduced to MILOŠEVIĆ as a Unit's "veteran officer".<sup>726</sup>

**TEOFANOVIĆ, Žarko**

175. Unit member TEOFANOVIĆ was killed on 9 April 1993 in Osmače while participating in the Podrinje operations under BOŽOVIĆ<sub>(DB)</sub> and JOVANOVIĆ<sub>(DB)</sub>.<sup>727</sup> The SerbianDB paid out TEOFANOVIĆ's wife,<sup>728</sup> and posthumously honoured him in 1996.<sup>729</sup>

**TEPAVČEVIĆ, Milan aka TEPA**<sup>730</sup>

176. TEPAVČEVIĆ was a SerbianDB employee throughout the Indictment, serving as SerbianDB Assistant/Deputy Chief,<sup>731</sup> subordinate to STANIŠIĆ.<sup>732</sup>

177. On 6 December 1991 TEPAVČEVIĆ, along with STANIŠIĆ and others, attended a joint meeting of the Security Administration, which dealt with the exchange of information about the activities of political parties focused on setting up armed formations.<sup>733</sup> STANIŠIĆ, TEPAVČEVIĆ, and PRODANIĆ<sub>(DB)</sub> met daily at the SerbianDB building in Belgrade, to assess the military equipment and supply requirements of Serbs in Croatia and BiH.<sup>734</sup> TEPAVČEVIĆ attended numerous high level meetings alongside STANIŠIĆ during 1991-1995.<sup>735</sup>

178. [REDACTED].<sup>736</sup>

179. TEPAVČEVIĆ was also involved with SerbianDB activities in BiH during 1992.<sup>737</sup> [REDACTED].<sup>738</sup> [REDACTED].<sup>739</sup>

180. TEPAVČEVIĆ [REDACTED], and was involved in approving requests for equipment and per diem payments.<sup>740</sup>

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<sup>723</sup> [REDACTED].

<sup>724</sup> AnnexE.1.

<sup>725</sup> P00849, p.5,9,11.

<sup>726</sup> P00256(00:09:06-00:10:40), p.4-6.

<sup>727</sup> P02842, p.1-4; [REDACTED]. *Cross-reference* Section II.D.2(a)(iv)b; Section II.F.5(b)(i).

<sup>728</sup> P02842, p.1; AnnexE.1; AnnexE.4. *Cross-reference* Section II.D.2(a)(vi)c.

<sup>729</sup> P00849, p.5,13.

<sup>730</sup> [REDACTED].

<sup>731</sup> P00209; P03250 ; P03252 . See P02453; [REDACTED]; P03207, p.14; P03219, p.5.

<sup>732</sup> [REDACTED]; VASILJEVIĆAleksandar:P02686, T.15885-15886; [REDACTED].

<sup>733</sup> VASILJEVIĆAleksandar:T.16(31-Jan-2019).

<sup>734</sup> *Cross-reference* Section II.E.3(a)(iii).

<sup>735</sup> [REDACTED]; P01614.

<sup>736</sup> [REDACTED].

<sup>737</sup> RFJ-109:P01787.

<sup>738</sup> [REDACTED].

<sup>739</sup> [REDACTED].

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**TORBICA, Darko**

181. [REDACTED].<sup>741</sup> [REDACTED].<sup>742</sup> [REDACTED],<sup>743</sup> [REDACTED].<sup>744</sup>  
 [REDACTED]<sup>745</sup> [REDACTED].<sup>746</sup>

182. TORBICA remained at Pajzoš as an instructor and squad commander after the Unit took on the RSK-MUP-JPN nomenclature in June 1992.<sup>747</sup> He received an award in 1996 related to his involvement with the Unit.<sup>748</sup>

**TORBICA, Željko**

183. TORBICA [REDACTED].<sup>749</sup> [REDACTED]<sup>750</sup> and was posthumously honoured by the Unit in May 1996.<sup>751</sup>

**ULEMEK, Mihajlo aka MILE**<sup>752</sup>

184. [REDACTED].<sup>753</sup> He cooperated with the SerbianDB,<sup>754</sup> [REDACTED],<sup>755</sup> [REDACTED].<sup>756</sup> [REDACTED].<sup>757</sup> In August 1991, the SMUP police in Stara Pazova (Serbia) described ULEMEK as “their boss”.<sup>758</sup> [REDACTED].<sup>759</sup>

185. [REDACTED].<sup>760</sup> [REDACTED].<sup>761</sup> [REDACTED].<sup>762</sup>

186. [REDACTED].<sup>763</sup>

<sup>740</sup> KRSMANOVIĆDragoslav:1D00384, para.49; [REDACTED]; KRSMANOVIĆDragoslav:T.51(25-Sep-2019); [REDACTED].

<sup>741</sup> [REDACTED]; [REDACTED].

<sup>742</sup> [REDACTED].

<sup>743</sup> [REDACTED].

<sup>744</sup> [REDACTED]. See also [REDACTED]; [REDACTED].

<sup>745</sup> P00258, p.1; [REDACTED]; P03310, p.7; [REDACTED]; P02851, p.9; P02850, p.10; P02835, p.18; P02834, p.13-14; [REDACTED].

<sup>746</sup> [REDACTED].

<sup>747</sup> P03238. Cross-reference Section II.D.2(a)(ii)a.

<sup>748</sup> P00849, p.5,9,11.

<sup>749</sup> [REDACTED].

<sup>750</sup> [REDACTED]; [REDACTED].

<sup>751</sup> P00849, p.5,13; [REDACTED]. Cross-reference Section II.D.2(a)(vi)c.

<sup>752</sup> [REDACTED]; SAVIĆBorivoje:P00449, para.173.

<sup>753</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]

<sup>754</sup> SAVIĆBorivoje:P00449, para.174; SAVIĆBorivoje:T.97-98(14-Sep-2017); [REDACTED].

<sup>755</sup> [REDACTED].

<sup>756</sup> [REDACTED].

<sup>757</sup> [REDACTED]; [REDACTED]. [REDACTED].

<sup>758</sup> SAVIĆBorivoje:T.97-98(14-Sep-2017); SAVIĆBorivoje:P00449, para.173-174.

<sup>759</sup> [REDACTED]; [REDACTED].

<sup>760</sup> [REDACTED]; [REDACTED].

<sup>761</sup> [REDACTED]; [REDACTED]. [REDACTED].

<sup>762</sup> [REDACTED]; [REDACTED].

<sup>763</sup> [REDACTED]. See also [REDACTED].



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187. [REDACTED].<sup>764</sup>

**ULEMEK, Milorad aka LEGIJA aka Milorad LUKOVIC**<sup>765</sup>

188. The SerbianDB recruited LEGIJA from abroad in 1991 “to command paramilitary units”, whereupon he joined the SDG and in 1992 assumed the position of ARKAN’s Deputy Commander.<sup>766</sup> [REDACTED].<sup>767</sup>

189. LEGIJA participated in the SDG’s activities in [REDACTED], Zvornik, and [REDACTED], during which the SDG committed crimes expelling non-Serbs.<sup>768</sup> He was arrested before the Zvornik takeover attempting to cross into Zvornik with weapons, PAVLOVIĆ<sub>(DB)</sub> and *vojna linija* member and STANIŠIĆ loyalist JNA General BOŠKOVIĆ<sup>769</sup> intervened.<sup>770</sup>

190. LEGIJA played a prominent role in the Accused’s joint operations in 1994-1995.<sup>771</sup> [REDACTED].<sup>772</sup> During Pauk, he commanded the SDG and Scorpions within TG-2<sup>773</sup> under the Accused’s command.<sup>774</sup> He took orders directly from the Accused,<sup>775</sup> [REDACTED],<sup>776</sup> and attended meetings in Petrova Gora wearing a red beret with the Unit insignia.<sup>777</sup> Later in 1995, he played a leading role in the SBWS 1995 operations as OG-2 Commander.<sup>778</sup> [REDACTED].<sup>779</sup> He was awarded by the Unit in 1996.<sup>780</sup>

191. Once the conflict was over, the Accused gave LEGIJA SIMATOVIĆ’s role as Unit Commander,<sup>781</sup> in which capacity he attended the KOSTIĆ Centre ceremony.<sup>782</sup>

<sup>764</sup> [REDACTED]; [REDACTED].

<sup>765</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>766</sup> VASILJEVIĆAleksandar:T.40(6-Feb-2019); [REDACTED]; ANASTASIJEVIĆDejan:P02423, para.97; P00842, p.1,4; [REDACTED].

<sup>767</sup> [REDACTED]; [REDACTED]; [REDACTED] [REDACTED]; [REDACTED].

<sup>768</sup> [REDACTED]; [REDACTED]; NOVAKOVIĆStojan:T.46-47(6-Oct-2020); [REDACTED].

<sup>769</sup> Cross-reference Section II.E.1(a),(c),(e).

<sup>770</sup> MUJIĆFadil:P01683, para.39-40,42; MUJIĆFadil:P01684, para.10-14,17-18; MUJIĆFadil:T.15-16,20-21(27-Feb-2018); OFS-23:T.41(15-Sep-2020); [REDACTED]; [REDACTED]. See VASILJEVIĆAleksandar:T.41-42(31-Jan-2019).

<sup>771</sup> Cross-reference Section II.F.5(b)(ii)(v).

<sup>772</sup> [REDACTED]; [REDACTED]; [REDACTED].

<sup>773</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; STOPARIĆGoran:P00796, para.89; [REDACTED]; THEUNENSReynaud:T.53(6-Mar-2018); P01125, p.1; P01123.

<sup>774</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>775</sup> [REDACTED]; [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.77-79(11-Jul-2018); [REDACTED]; P00820, p.53,56,58.

<sup>776</sup> [REDACTED]; [REDACTED]. See [REDACTED]; [REDACTED].

<sup>777</sup> [REDACTED]; [REDACTED]; SLIŠKOVIĆDejan:T.79(11-Jul-2018).

<sup>778</sup> P00842, p.1-2; [REDACTED]; [REDACTED]; [REDACTED].

<sup>779</sup> [REDACTED]; [REDACTED].

<sup>780</sup> P00846, p.5,8,10.

<sup>781</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P00256, p.2-3.

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**VASILJKOVIĆ, Dragan aka Captain DRAGAN**

192. Captain DRAGAN was working for and under the authority of the Accused from the beginning of the Indictment period, establishing, arming, and training numerous Serb Forces—including the Accused’s Unit.<sup>783</sup> The SerbianDB monitored Captain DRAGAN for months before engaging him,<sup>784</sup> bringing him to Krajina in the spring of 1991, where he helped establish SerbianDB camps in Golubić, Knin fortress, and Šamarica, and led Serb Forces in early operations to expel non-Serbs from Krajina.<sup>785</sup> After leaving Krajina, Captain DRAGAN continued to work for the Accused, first, in SBWS, where he established the Tikveš camp in August 1991,<sup>786</sup> and then in BiH, where he established the Divič and Brčko camps in the first half of 1992.<sup>787</sup> In 1993, Captain DRAGAN trained a number of recruits at the *Alfa* camp in Knin, who later became members of the Unit’s *Poskok* Detachment in 1995.<sup>788</sup>

**VUČKOVIĆ, Borjan aka BOKI**<sup>789</sup>

193. VUČKOVIĆ, an original Unit member,<sup>790</sup> joined the Unit on 15 May 1991, and trained at Golubić before transferring to the Knin fortress.<sup>791</sup> He participated in the Unit’s operations in Krajina, including Ljubovo, Glina, and Kijevo.<sup>792</sup> Thereafter, **SIMATOVIĆ** transferred him to Ležimir.<sup>793</sup>

194. In December 1991, VUČKOVIĆ was killed in a landmine accident at Pajzoš, where he was an instructor.<sup>794</sup> The Novi Sad Corps denied VUČKOVIĆ’s father’s request for financial assistance as VUČKOVIĆ died as “a member of the Serbian State Security”.<sup>795</sup> VUČKOVIĆ was posthumously honoured by the Unit in 1996.<sup>796</sup>

<sup>782</sup> P00256, p.3,25-26.

<sup>783</sup> Cross-reference Section II.D.1(a).

<sup>784</sup> 2D00269.

<sup>785</sup> Cross-reference Section II.E.4(a)(i)-(iii); Section II.F.1(b)(ii); Section II.F.1(c)(ii); Section III.B.1(b)(i)-(ii).

<sup>786</sup> Cross-reference Section II.E.4(b)(i); Section II.F.2(f)(ii)c.

<sup>787</sup> Cross-reference Section II.E.4(c)(i); Section II.E.4(d)(i); Section II.F.4(b)(i)b.iv.

<sup>788</sup> Cross-reference Section II.D.2(a)(v).

<sup>789</sup> [REDACTED].

<sup>790</sup> [REDACTED]; [REDACTED].

<sup>791</sup> P00260, p.1,3-5; [REDACTED].

<sup>792</sup> P03234; P00260, p.29,34. Cross-reference Section II.D.2(a)(i); Section II.F.1(c)(ii).

<sup>793</sup> [REDACTED]; [REDACTED]. Cross-reference Section II.D.2(a)(ii).

<sup>794</sup> P00260, p.1,4,5,23,29-34,35; [REDACTED]; [REDACTED].

<sup>795</sup> P00260, p.7,9,13,15,17,18.

<sup>796</sup> P00849, p.5,13. Cross-reference Section II.D.2(a)(vi)c.

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**VUČKOVIĆ, Ilija aka RAMBO**<sup>797</sup>

195. VUČKOVIĆ was an original Unit member and [REDACTED] at Golubić, before deploying [REDACTED], Šamarica, and [REDACTED].<sup>798</sup> In mid-1991, he participated in the Glina attack.<sup>799</sup> From around November 1991, VUČKOVIĆ was [REDACTED].<sup>800</sup> By February 1992, VUČKOVIĆ was the camp commander at Ležimir and Pajzoš. He retained that position during the period after the Unit stationed at Pajzoš took on the RSK-MUP nomenclature.<sup>801</sup>

**VUČKOVIĆ, Vojin aka ŽUĆO/ŽUĆA**

196. The SerbianDB sent VUČKOVIĆ to Zvornik to become the commander of [REDACTED] the Yellow Wasps.<sup>802</sup> [REDACTED].<sup>803</sup> In early April 1992, VUČKOVIĆ reported to PAVLOVIĆ<sub>(DB)</sub>—the Accused’s proxy in Zvornik—in Mali Zvornik (Serbia) for the Zvornik operation.<sup>804</sup> VUČKOVIĆ was then arrested with his brother Dušan aka REPIĆ VUČKOVIĆ and LEGIJA<sub>(DB)</sub> attempting to cross into Zvornik with weapons and strangle wire the night before the Zvornik takeover, and PAVLOVIĆ<sub>(DB)</sub> and *vojna linija* member and STANIŠIĆ loyalist JNA General BOŠKOVIĆ<sup>805</sup> intervened.<sup>806</sup> Under PAVLOVIĆ<sub>(DB)</sub>’s Zvornik TO,<sup>807</sup> VUČKOVIĆ commanded the Yellow Wasps in Zvornik, which committed horrific crimes, including sexually abusing and murdering hundreds of Muslim detainees.<sup>808</sup> [REDACTED],<sup>809</sup> [REDACTED],<sup>810</sup> [REDACTED].<sup>811</sup>

<sup>797</sup> [REDACTED].

<sup>798</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; P03233.

<sup>799</sup> P03237; 1D00047, p.2.

<sup>800</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>801</sup> P00259, p.7,15; [REDACTED]; P02831, p.1,8; P03066; P03238; P03729, p.4; P02872, p.1-2; [REDACTED]; P02702, p.8. *Cross-reference* Section II.D.2(a)(ii)a.

<sup>802</sup> [REDACTED]; [REDACTED].

<sup>803</sup> [REDACTED]. *See* P01687, p.2.

<sup>804</sup> 2D00122; 2D00121, p.1-2; [REDACTED]. *See also* P03281, p.2; AF1031.

<sup>805</sup> *Cross-reference* Section II.E.1(a),(c),(e).

<sup>806</sup> MUJIĆFadil:P01683, para.39-40,42; MUJIĆFadil:P01684, para.10-14,17-18; MUJIĆFadil:T.15-16,20-21(27-Feb-2018); OFS-23:T.41(15-Sep-2020); [REDACTED]; [REDACTED]. *See* VASILJEVIĆAleksandar:T.41-42(31-Jan-2019).

<sup>807</sup> P01687, p.2-3. *Cross-reference* Section II.D.1(c).

<sup>808</sup> *Cross-reference* Section III.C.2(b).

<sup>809</sup> [REDACTED].

<sup>810</sup> [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED].

<sup>811</sup> [REDACTED]; [REDACTED].

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**VUKMIROVIĆ, FNU aka Vuk**<sup>812</sup>

197. [REDACTED].<sup>813</sup> Under BOŽOVIĆ<sub>(DB)</sub>'s command, he [REDACTED] participated in the Doboj takeover operations and violent campaign expelling non-Serbs.<sup>814</sup>

**VUKOVIĆ, Aleksandar aka VUK**<sup>815</sup>

198. VUKOVIĆ participated in combat operations in SAO-Krajina between September and November.<sup>816</sup> VUKOVIĆ joined the Unit in February 1992 in Ležimir, and was issued with a SMUP ID.<sup>817</sup> By March he was an instructor at Pajzoš.<sup>818</sup>

199. In April 1992, following SIMATOVIĆ's briefing, VUKOVIĆ was deployed under CRNI<sub>(DB)</sub>'s command to take over Bosanski Šamac.<sup>819</sup> He was killed in Bosanski Šamac, and his coffin was transported from Bijeljina in a JNA helicopter along with non-Serb prisoners from Bosanski Šamac to Serbia.<sup>820</sup>

**ZEČEVIĆ, Budimir**

200. ZEČEVIĆ joined the Unit in November 1991<sup>821</sup> and was at Pajzoš in December 1991.<sup>822</sup> Despite indicating in his February 1992 application that he had prior convictions and had served time in prison, which was confirmed in response to STANIŠIĆ's request for his background check, ZEČEVIĆ remained in the Unit, and was issued with official SMUP ID.<sup>823</sup>

201. In 1993, he served under MIJOVIĆ<sub>(DB)</sub> in Bratunac.<sup>824</sup> In August 1993, when the Accused formalised the Unit as the JATD, SIMATOVIĆ approved another background check request for ZEČEVIĆ.<sup>825</sup> In October 1993, he shot and killed a civilian and seriously

<sup>812</sup> [REDACTED].

<sup>813</sup> [REDACTED]; [REDACTED].

<sup>814</sup> RFJ-165:T.11-12(29-May-2018); [REDACTED]; [REDACTED]; [REDACTED]. [REDACTED].

<sup>815</sup> P02038, p.1.

<sup>816</sup> P02850, p.1,6,11.

<sup>817</sup> P02850, p.1,4,6,10. [REDACTED].

<sup>818</sup> [REDACTED]. *Cross-reference* Section II.E.4(b)(iii).

<sup>819</sup> *Cross-reference* Section II.D.2.(a)(iii)a); Section II.F.4(b)(ii)a.iv; [REDACTED]; P01938, p.256-257. *See* AF1059.

<sup>820</sup> *Cross-reference* Section III.C.3(b). LUKAČDragan:P02732, T.1712-1716; [REDACTED]; [REDACTED]]. *See also* P02038.

<sup>821</sup> P02852, p.7,9,10,25,28; [REDACTED].

<sup>822</sup> P00260, p.23.

<sup>823</sup> P02852, p.4,6-8,13-14,38-39,41. *Cross-reference* Section II.D.2(a)(ii).

<sup>824</sup> P02852, p.1. *Cross-reference* Section II.D.2(a)(iv)a.

<sup>825</sup> P02852, p.21-24(p.16-17(BCS))(SIMATOVIĆ initialed the request). *Cross-reference* Section II.D.2(a)(vi) a; AnnexF, p.5-6.

Annex A: Index of Persons with a Significant Relationship to the SerbianDB

injured another in a café.<sup>826</sup> Despite the incident being reported directly to **STANIŠIĆ**'s deputy **TEPAVČEVIĆ<sub>(DB)</sub>** and **SIMATOVIĆ**,<sup>827</sup> **ZEČEVIĆ** remained in the Unit: he received per diems in 1993-1995,<sup>828</sup> and he operated as a Unit member in Beli Manastir in July 1995,<sup>829</sup> and Bilje in December 1995.<sup>830</sup> In May 1996, he received an award from the Unit.<sup>831</sup>

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<sup>826</sup> P02852, p.19.

<sup>827</sup> P02852, p.3(ENG)(BCS)(**SIMATOVIĆ**'s initials at the top of the document indicate that he familiarised himself with the contents. *See* **MIĆIĆ**Radivoje:T.4(4-Mar-2020); AnnexF, p.5-6.

<sup>828</sup> AnnexE.1.

<sup>829</sup> P00540, p.1.

<sup>830</sup> P02852, p.25,28. *Cross-reference* Section II.D.2(a)(v).

<sup>831</sup> P00849, p.5,9,12.

**UNITED NATIONS**

**INTERNATIONAL RESIDUAL MECHANISM FOR CRIMINAL TRIBUNALS**

**Case No. MICT-15-96-T**

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ &  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION***

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**ANNEX B**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**CORROBORATION OF SIMATOVIĆ's 1997 KOSTIĆ CENTRE CEREMONY SPEECH**

## Annex B: Corroboration of Simatović's 1997 Kostić Centre Ceremony Speech

This Annex sets out the verbatim text of **SIMATOVIĆ**'s speech at the 1997 KOSTIĆ Centre ceremony<sup>1</sup> with non-exhaustive citations to corroborating evidence admitted in this case.

### Speech Transcript

“Mr. President, we thank you for accepting the invitation to attend the ceremony marking the anniversary of the formation of the Special Operations Unit of the State Security Service. It was constituted on 4 May 1991 at the time of break-up of the former Yugoslavia,<sup>2</sup> and since it emerged has constantly worked to protect national security in circumstances where the existence of the Serbian people was directly jeopardised throughout its entire ethnic area.<sup>3</sup> Its combat operations were anti-terrorist, directed at preventing war crimes, mass retaliation and genocide.

From the first moment of its existence and establishment, the unit has passed through a heroic epic, and its path has been one of the most difficult ones in the history of our struggle. Due to the international circumstances familiar to us all, we were forced to operate in complete secrecy.<sup>4</sup> And despite wartime conditions: fighting with Croatian and Muslim troops, the presence of numerous United Nations and international forces – later IFOR and SFOR – and numerous instruments of foreign intelligence services in the field where /inaudible/ unit is not /inaudible/.<sup>5</sup> The contribution of the Special Operations Unit is enormous. Forty-seven soldiers were killed and 250 wounded in combat operations at 50 different locations.<sup>6</sup> We are proud of the unit's level of professional training, which meets the highest international standards, and the unit has never experienced defeat.

One of its most recent successes was its engagement in the freeing of 400 UNPROFOR hostages in Republika Srpska, which met with a very positive response in the

<sup>1</sup> P00256(00:12:25-00:19:25), p.9-12.

<sup>2</sup> P00059(Clip 1, 00:50:05-00:50:26), p.17; P00259, p.14; P00261, p.5; P00260, p.1,4,5; P00265, p.9; P00266, p.8; P00262, p.7,11; P00263, p.2; P00264, p.13; [REDACTED]; P00258, p.12-13; [REDACTED].

<sup>3</sup> [REDACTED]; BABIĆMilan:P01246, T.13064-13066,13501,13973-13975; BABIĆMilan:P01248, T.1416,1567; P00261, p.5; [REDACTED]; MIČIĆRadivoje:T.20(3-Mar-2020); [REDACTED].

<sup>4</sup> [REDACTED]; BABIĆMilan:P01246, T.13134; BABIĆMilan:P01243, p.17; NIELSENChristian:T.16-17(15-Nov-2017); RFJ-083:T.12(8-May-2018); P00059(Clip 1, 00:24:46-00:24:56), p.5,16; [REDACTED].

<sup>5</sup> P00855, p.1,4; [REDACTED]; SLIŠKOVIĆDejan:P02538, para.6,7; [REDACTED]; LUČIĆMiroslav:T.52(8-Sep-2020).

<sup>6</sup> P02713, p.2; P02842, p.3; 2D00324, p.14-17; 1D00092, p.22; P01972, p.4; P02853, p.3; P02590, p.1; P02864, p.21; 1D00630, p.22; [REDACTED]; P00839, p.4; P00260, p.1; P02706, p.1; [REDACTED]; P02032, p.2; P02031, p.2; P02030, p.2; P02598, p.46.



## Annex B: Corroboration of Simatović's 1997 Kostić Centre Ceremony Speech

international community and made our country's position stronger.<sup>7</sup> One of the unit's most successful actions in our territory was the capturing of the National Guard Corps terrorist group, caught in the Apatin area in 1993.<sup>8</sup>

Mr. President, allow us to inform you briefly about the unit's history, its combat record, present situation and function. When it was formed, its core was made up of members of our service, Republic of Serbian Krajina Police and volunteers from Serbia.<sup>9</sup> The Second War Service Intelligence Administration, which was also set up at the time, included a special team for offensive and logistical support of the Special Operations Unit.<sup>10</sup>

From 12 October 1991, in battles with armed Croatian police forces in the zones of Benkovac, Stari Gospić, Plitvice, Glina, Kostajnica and others, the unit provided important support in the liberation of all areas of the Republic of Serbian Krajina.<sup>11</sup> Around 5,000 soldiers were engaged in these battles and their actions were coordinated by the unit Command and an intelligence team from the Second Administration.<sup>12</sup>

In May 1991 an air-helicopter squadron was formed which transported tons of special shipments, equipment, troops and machinery from the improvised airfields of Medeno Polje, Petrovac, Velika Popina, Srb and Udbina and carried out numerous complex tasks while war operations were ongoing.<sup>13</sup>

In September 1991 a part of the unit was transferred to Serbia, where its reconstruction was conducted and high-quality professional training organised.<sup>14</sup> These two Units were

<sup>7</sup> [REDACTED]; P03155, p.1-2; P03156, p.17.

<sup>8</sup> [REDACTED].

<sup>9</sup> [REDACTED]; P02710, p.19; [REDACTED]; P00553, p.30-31; [REDACTED]; P02702, p.1; [REDACTED]; P02045, p.3; [REDACTED].

<sup>10</sup> P00242; MIĆIĆRadivoje:T.21-24(3-Mar-2020); MIĆIĆRadivoje:T.6(4-Mar-2020); MAKSIĆRadoslav:P00025, para.75; [REDACTED].

<sup>11</sup> [REDACTED]; BABIĆMilan:P01246, T.13055-13056,13064-13066,13383-13385,13397-13399; BABIĆMilan:P01248, T.1567; [REDACTED]; P00261, p.5; P00258, p.12-13; MAKSIĆRadoslav:P00025, para.23,75-77,79,80,94,111; MAKSIĆRadoslav:T.16-17,18-20,25,34,38(21-Jun-2017); MAKSIĆRadoslav:T.47-49,67(22-Jun-2017); P00030, p.1-2; P00839, p.1; P02710, p.19; P00066; [REDACTED]; RFJ-066:T.40-42(10-Jul-2017); RFJ-066:T.5(24-Aug-2017); P00260, p.29; [REDACTED]; P00301, p. 1-2. *See* P00049, p.1; P00047, p.1; P03230; P03231; P03232; P03233; P03234; P03235; P03236; P03059; P01985; P01986; 1D00032; 1D00047.

<sup>12</sup> [REDACTED]; VASILJEVIĆAleksandar:T.33(31-Jan-2019); [REDACTED].

<sup>13</sup> P02888, p.172-184; [REDACTED]; P00260, p.29; [REDACTED]; 2D00409, p.2; P00059(Clip 1, 01:01:05-01:01:24)(Clip 2, 00:21:28-00:21:45), p.23,34; [REDACTED]; SLIŠKOVIĆDejan:P02538, para.4,13; [REDACTED].

<sup>14</sup> [REDACTED]; P00262, p.11.

Annex B: Corroboration of Simatović's 1997 Kostić Centre Ceremony Speech

involved in operations in eastern Slavonia, Baranja and western Srem.<sup>15</sup> Twenty-six training camps for special police units of Republika Srpska and the Republic of Serbian Krajina were also formed in that period.<sup>16</sup> In the Republic of Serbian Krajina in Golubić,<sup>17</sup> Dinara,<sup>18</sup> Obrovac,<sup>19</sup> Gračac,<sup>20</sup> Plitvice,<sup>21</sup> Šumarice,<sup>22</sup> Petrova Gora,<sup>23</sup> Lički Osik,<sup>24</sup> Benkovac,<sup>25</sup> Ležimir,<sup>26</sup> Ilok,<sup>27</sup> and Vukovar, and in RSK /Republic of Serbian

<sup>15</sup> [REDACTED]; P00261, p.5; [REDACTED]; P00258, p.12-13; [REDACTED]; RFJ-160:P02541, para.16; BOGUNOVIĆBorislav:P02718, para.13; BOGUNOVIĆBorislav:P02719, para.14; BOGUNOVIĆBorislav:P02720,T.5995-5996,6010-6011; [REDACTED].

<sup>16</sup> [REDACTED]; MAKSIĆRadoslav:P00025, para.23; MAKSIĆRadoslav:T.16-17(21-Jun-2017); MAKSIĆRadoslav:T.67(22-Jun-2017); [REDACTED]; [REDACTED]; BABIĆMilan:P01246, T.13134; BABIĆMilan:P01243, p.17; DERONJIĆMiroslav:P01717, para.131-132,134-137; DERONJIĆMiroslav:P01719, T.29643; 2D00089, p.5; P02888, p.250,266-267; P03589; 2D00083, p.5; [REDACTED]; P03583; [REDACTED]; SLIŠKOVIĆDejan:P02538, para.3; [REDACTED]; SLIŠKOVIĆDejan:P02541, para.7; STEVANOVIĆObrad:P03853; STEVANOVIĆObrad:T.45(30-Sep-2020); THEUNENSReynaud:P01980, p.165; P00021, p.2-3; [REDACTED]; RFJ-165:T.28(29-May-2018); [REDACTED]; P00537(00:00:27-00:01:03).

<sup>17</sup> P00011; THEUNENSReynaud:P01980, p.163; P00250, p.1; P00248, p.1-2; P00211; P00247; P00271(00:00:00-00:01:58); [REDACTED]; P00258, p.12-13; [REDACTED]; BABIĆMilan:P01246, T.13118-13121; BABIĆMilan:P01243, p.17; P02861, p.1; P02710, p.19; P00500, p.3; [REDACTED]; P00537(00:00:53-00:01:03), p.2.

<sup>18</sup> P00537(00:00:53-00:01:03), p.2.

<sup>19</sup> P00537(00:00:53-00:01:03), p.2.

<sup>20</sup> P00537(00:00:53-00:01:03), p.2.

<sup>21</sup> [REDACTED]; BABIĆMilan:P01246, T.13397; MAKSIĆRadoslav:P00025, para.23; MAKSIĆRadoslav:T.67(22-Jun-2017); MAKSIĆRadoslav:P00025, para.23,75-77; P00537(00:00:45-00:00:52).

<sup>22</sup> [REDACTED]; BABIĆMilan:P01243, p.17; BABIĆMilan:P01248, T.1539,1546; P03401; P03402, p.6; P01964; 1D00813; 1D01416; 1D01417; P03416, p.2-3.

<sup>23</sup> [REDACTED]; RFJ-160:P02538, para.7; [REDACTED]; MIĆIĆRadivoje:T.58(4-Mar-2020); P00537(00:00:38-00:00:44), p.1.

<sup>24</sup> P00537(00:00:49-00:00:52), p.2.

<sup>25</sup> [REDACTED]; BABIĆMilan:P01243, p.17; BABIĆMilan:P01246, T.13123,13127,13401; BABIĆMilan:P01248, T.1427,1539,1546; P01972, p.4; [REDACTED]; P00537(00:00:53-00:01:03), p.2.

<sup>26</sup> [REDACTED]; P00059(Clip 1, 00:53:57-00:54:18), p.19; P00260, p.4-5,29,31; [REDACTED]; P02704, p.21; P00500, p.4,16,36; [REDACTED]; P02045, p.3; P02040, p.1; [REDACTED].

<sup>27</sup> [REDACTED]; P00260, p.1,5,31; P00839, p.6,11,16; [REDACTED]; P00500, p.16; P02704, p.21; P00258, p.11; P00816, p.3; P00830, p.21; [REDACTED]; P02040, p.1; P02030, p.1-2; P00846, p.1,3; [REDACTED]; P01938, p.256-257; P00258, p.14; BOGUNOVIĆBorislav:P02718, para.9,24; BOGUNOVIĆBorislav:P02719, para.7-9; BOGUNOVIĆBorislav:P02720, T.5998-6001,6074,6088; P01974; THEUNENSReynaud:P01980, p.179,184; [REDACTED].

## Annex B: Corroboration of Simatović's 1997 Kostić Centre Ceremony Speech

Krajina/ /as stated/ in Banja Luka,<sup>28</sup> Doboj,<sup>29</sup> Šamac,<sup>30</sup> Brčko,<sup>31</sup> Bijeljina,<sup>32</sup> Trebinje, Višegrad,<sup>33</sup> Ozren,<sup>34</sup> and Mrkonjić Grad.

Units of Serbian /?were involved in six large/ joint operations in eastern Slavonia,<sup>35</sup> the corridor at Brčko,<sup>36</sup> in the Drina,<sup>37</sup> Sarajevo,<sup>38</sup> and /?Maglaj operations.<sup>39</sup> In western Bosnia the unit was the backbone of Fikret ABDIC's army with around 15,000 soldiers who freed most of Cazin Krajina.<sup>40</sup>

Also in 1992 they began building and securing a network of small airfields in Bosnia and Herzegovina, and also forming a combat squadron.<sup>41</sup> Around a thousand combat, reconnaissance, transport and humanitarian flights were made from the airfields in

<sup>28</sup> P03681; NIELSENChristian:P00850, para.912. *See also* P03513, p.4; [REDACTED].

<sup>29</sup> [REDACTED]; P01171; P01172; P01173; P00500, p.16; RFJ-165:T.17-18(29-May-2018); [REDACTED]; P01950; P01167, p.3,5,7; P00841, p.3; [REDACTED]; P00537(00:00:27-00:00:31), p.1.

<sup>30</sup> STOPARIĆGoran:P00796, para.61; STOPARIĆGoran:T.11(9-Nov-2017); STOPARIĆGoran:T.15(30-Nov-2017); [REDACTED]; RFJ-165:T.28(29-May-2018); P01949, p.2.

<sup>31</sup> [REDACTED]; STOPARIĆGoran:P00796, para.61; STOPARIĆGoran:T.11(9-Nov-2017); STOPARIĆGoran:T.15(30-Nov-2017); [REDACTED]; THEUNENSReynaud:P01980, p.486; 1D00034, p.3.

<sup>32</sup> [REDACTED]; 1D00629, p.16; [REDACTED]; P01949, p.2.

<sup>33</sup> DERONJIĆMiroslav:P01717, para.134-138; STEVANOVIĆObrad:P03853; STEVANOVIĆObrad:T.45(30-Sep-2020).

<sup>34</sup> P00500, p.16; [REDACTED]; 2D00089, p.9; P02368; P02370; P02369; [REDACTED]; RFJ-165:T.11-12,18-19(29-May-2018); [REDACTED]; P02374, p.3-4; P02372, p.115-116; P01168, p.3; P01169, p.5; [REDACTED]; THEUNENSReynaud:P01980, p.499-500; THEUNENSReynaud:T.61(6-Mar-2018); P00537(00:00:27-00:00:31), p.1.

<sup>35</sup> [REDACTED]; P00500, p.4,16; P00264, p.7,13,20; P00499, p.1-2; [REDACTED]; P00261, p.5; [REDACTED]; P00258, p.12-13,32; P00845, p.7; [REDACTED].

<sup>36</sup> [REDACTED]; P00258, p.12-13; STOPARIĆGoran:P00796, para.61; STOPARIĆGoran:T.9,11(9-Nov-2017); STOPARIĆGoran:T.15(30-Nov-2017); [REDACTED]; 2D00089, p.10; P00811, p.1; P00500, p.16; [REDACTED]; P02045, p.3; P02040, p.1; P02048, p.1; P01951, p.1; P00846, p.1,3-4; [REDACTED]; P02388; [REDACTED]; P01170, p.2; THEUNENSReynaud:P01980, p.486; 1D00034, p.3; [REDACTED]; P03142, p.1; P03149, p.3.

<sup>37</sup> [REDACTED]; P00258, p.12-13; [REDACTED]; RFJ-083:T.37-38(8-May-2018); RFJ-083:T.25(9-May-2018); RFJ-083:T.60(10-May-2018); P02889, p.41; 2D00089, p.5; P00265; P01949; P03676; [REDACTED]; P02852, p.1-2; P01939; P01942; P03615; P03621; P01946; 1D00114; P01943, p.137-140; THEUNENSReynaud:P01980, p.410-411,433,517-518,520-535; P03524, p.1; P03175, p.5; P01949, p.2; P03144, p.3; DERONJIĆMiroslav:P01717, para.131-132; P02888, p.172-184; P00059(00:46:37-00:46:47), p.23.

<sup>38</sup> 2D00093, p.12; P01081, p.15-17,22-23,27,46,104-105; P00821, p.2; STOPARIĆGoran:P00796, para.98-100; STOPARIĆGoran:T.7-9(8-Nov-2017); P00822; P00824; [REDACTED]; P02356; THEUNENSReynaud:P01980, p.433,550-556; P00821; P03526; P03690; P03527; P03530; P03529; P03532; P03534; P03535; P03524; P02356; 1D00935.

<sup>39</sup> 2D00158, p.7,9-13,15; [REDACTED]; P01167, p.3,5,7; P02387, p.5.

<sup>40</sup> P00820, p.11,13,17,23,26,53,56-58,10; 1D00092, p.28; STOPARIĆGoran:T.5(8-Nov-2017); STOPARIĆGoran:P00796, para.88-89,91; [REDACTED]; P01123; 2D00220; P01125; P02567, p.7-12; SLIŠKOVIĆDejan:P02538, para.6,8,13; [REDACTED]; SLIŠKOVIĆDejan:T.65,72-73(11-Jul-2018); SLIŠKOVIĆDejan:T.102(12-Jul-2018); P02598, p.4-5,9,31,45; 2D00219; [REDACTED]; P01947, p.2; P01123; P02939; P03454; 1D00037; P02709, p.11; 2D00409; 2D00220; THEUNENSReynaud:P01980, p.541-548; KARANMladen:T.11,14-15(30-Jan-2020); [REDACTED]; LUČIĆMiroslav:T.6(9-Sep-2020).

<sup>41</sup> [REDACTED]; P02863, p.19-20,25-30; P02716, p.1-2; P03524, p.1; P02598, p.9.

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Bratunac, /?Skelani /, Sokolac, Rogatica and others.<sup>42</sup> In mid/spring of last year it retreated from these parts with complete equipment and machinery, helicopters and aircraft.<sup>43</sup> Throughout that period its operation remained undetected, despite NATO's sophisticated equipment and intensive investigation by a number of foreign intelligence services. The unit's humanitarian activities throughout the entire period /inaudible/ are also substantial. One of them was the promotion of Captain Dragan's Fund, which employs 150 wounded persons and cares for over 2500 children of soldiers killed, and also mediates in the employment of around 6000 socially deprived persons, for the most part /inaudible/.<sup>44</sup> After the end of war in the area of the former Yugoslavia the Special Operations Unit was demobilised and its numerical strength was, of course, adapted to present conditions and obligations. With the new organisation, which became effective in the Service as of May of last 36 year, the unit was reduced to 593 members, which operates at 75 percent of strength. The current reserve force is of company strength, made up of former soldiers who are trained to maintain a constantly high level of combat readiness. Part of the Special Operations Unit organisation are units /inaudible/ to battalions, companies and platoons, and also a helicopter squadron. In addition, tactical services providing logistical, medical, intelligence and counter-intelligence support are also part of the unit.

The Centre in which we are now bears the name of Radoslav KOSTIĆ a distinguished member of this unit who was killed three years ago in western /inaudible/.<sup>45</sup> The Service took over this building in February 1995 in a very damaged condition, and prior to that, from 1991, it had served as a refugee reception centre. You will have the opportunity to see that we have managed to build a modern centre with training grounds, a firing range, a heliport, a dispensary, hangars and other facilities. Due to functional needs we have planned the construction of a number of tactical facilities, and some of them have already been put into operation.

Mr. President, the Special Operations Unit is in the stage of /inaudible/ being trained for /inaudible/ operations against terrorism and other forms of jeopardising the country's security. It represents an important contribution to the elimination of all potential threats

<sup>42</sup> P02888, p.180; [REDACTED]; P00856, p.10; [REDACTED]; P02598, p.45-46; 2D00502, p.6; LUČIĆMiroslav:T.52(8-Sep-2020); DERONJIĆMiroslav:P01717, para.141; DERONJIĆMiroslav:P01719, T.29790-29791.

<sup>43</sup> [REDACTED]; P00855, p.1,14-15.

<sup>44</sup> 1D00061, p.18; P02707, p.10; P03312, p.2.

<sup>45</sup> P00522, p.37,60,64-67; [REDACTED]; P00059(Clip 2, 00:27:26-00:27:43), p.38; [REDACTED].

Annex B: Corroboration of Simatović's 1997 Kostić Centre Ceremony Speech

to the national and state security of Serbia, which is mobile and professionally capable of acting quickly and efficiently in any part of the country or abroad. Thank you.”

**UNITED NATIONS**

**INTERNATIONAL RESIDUAL MECHANISM FOR CRIMINAL TRIBUNALS**

**Case No. MICT-15-96-T**

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ &  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION***

---

**ANNEX C**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**PROOF OF DEATH**

**PUBLIC REDACTED VERSION ANNEX C**  
**TO PROSECUTION FINAL TRIAL BRIEF**

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Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
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### Bačín & surroundings (Paragraph 27)

1	ALAVANČIĆ, Katarina (Kata)	1910	Croat	female	1	Autopsy Report	P00864	Very probably gunshot wounds to the chest. Deformed projectile found in the area of left breast. Cause of death was <i>verostrelna smrtnost</i> (gunshot wound). War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00607	Date of Disappearance: 01/10/1991.	[REDACTED]
					3	Letter	P00865		[REDACTED]
2	ALAVANČIĆ, Terezija (Raza/Reza)	1922	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00608	Most probably it was a mechanic device, which could be, as in the other cases, an impact of the projectiles fired from the hand-arms in the area of left upper arm.  Date of Disappearance: October 1991.	[REDACTED]
									[REDACTED]
									[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
3	ANTOLOVIĆ, Josip	1910	Croat	male	1	Autopsy Report	P00866	Cause of death was <i>vulnera sclopetaria corporis</i> (gunshot wound).	[REDACTED]
					2	Exhumation Report & Missing Person Questionnaire	P00609	Date of Disappearance: 14-20/10/1991.	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]
4	ANTOLOVIĆ, Marija	1905	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00610	Cause of death was <i>vulnera sclopetarium corporis</i> (shot wounds to the trunk).	[REDACTED]
								Date of Disappearance: October 1991.	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]
5	BATINOVIC, Marija	1901	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00611	Probably shot wounds to the thoracic cage and lower extremities.	[REDACTED]
								Date of Disappearance: 16/10/1991.	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
6	BLINJA, Ana	1923	Croat	female	1	Autopsy Report	P00867		[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Death Certificate	P00869	Cause of death was <i>vulnera explosiva capitis</i> . War was the external cause of violent death.	[REDACTED]
					4	Missing Person Questionnaire	P00612; P00606, p.2	Date of Disappearance: 14/10/1991.	[REDACTED] [REDACTED]
7	BLINJA, Josip	1926	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00613	Most probably the force of a mechanical instrument exerted on the region of the right lower leg. This could be projectiles fired from small arms.  Date of Disappearance: 15/10/1991.	[REDACTED]  [REDACTED]
									[REDACTED]
									[REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
8	BLINJA, Katarina	1933	Croat	female	1	Autopsy Report	P00870		[REDACTED]	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]	
					3	Death Certificate	P00872	Cause of death was <i>verosimiliter vulnera explosiva</i> . War was the external cause of violent death.	[REDACTED]	
					4	Missing Person Questionnaire	P00614	Date of Disappearance: 15/10/1991.	[REDACTED]	
9	BLINJA, Nikola	1922	Croat	male	1	Missing Person Questionnaire	P00615	Date of Disappearance: 14/09/1991.	[REDACTED]	[REDACTED]
									[REDACTED]	
									[REDACTED]	
10	ČORIĆ, Mara	1939	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00616	Cause of death was <i>fractura multifragmentalis cranii</i> (multiple trauma to the head). Date of Disappearance: 21/08/1991.	[REDACTED]	[REDACTED]
									[REDACTED]	
									[REDACTED]	
									[REDACTED]	

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
11	ČOVIĆ, Mijo	1915	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00617	Cause of death was <i>vulnus sclopetarium thoracis</i> (trauma to the chest by gunshot wound).  Date of Disappearance: October 1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
12	DELIĆ, Marija	1931	Croat	female	1	Missing Person Questionnaire	P00618	Date of Disappearance: 25/10/1991.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]
13	DIKULIĆ, Ana	1942	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00619	The head is detached and only the occipital region of the parietal region found.  Date of Disappearance: 25/10/1991.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
14	DIKULIĆ, Ruža	1913	Croat	female	1	Autopsy Report	P00873	Cause of death was most probably gunshot wounds to the head and chest.	[REDACTED]
					2	DNA Analysis	P00874		[REDACTED]
					3	Missing Person Questionnaire	P00620	Date of Disappearance: 20/10/1991.	[REDACTED]
15	DIKULIĆ, Sofia (Sofija)	1947	Croat	female	1	Autopsy Report & Report of Death	P00875	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound to the head entry at front). War was the external cause of violent death.	[REDACTED]
					2	DNA Analysis	P00876		[REDACTED]
16	DIKULIĆ, Stjepan	1937	Croat	male	3	Missing Person Questionnaire	P00621	Date of Disappearance: 20/10/1991.	[REDACTED]
					1	Missing Person Questionnaire	P00622	Date of Disappearance: 25/10/1991.	[REDACTED]
									[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
17	DUKIĆ (ĐUKIĆ), Antun	1933	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00623	Date of Disappearance: 25/10/1991.	[REDACTED]  [REDACTED]  [REDACTED]  [REDACTED]  [REDACTED]
18	DUKIĆ (ĐUKIĆ), Marija	1923	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00624	Cause of death was <i>vulnus sclopetarium abdominis</i> (trauma to abdomen caused by gunshot wound).  Date of Disappearance: 14-16/10/1991.	[REDACTED]  [REDACTED]  [REDACTED]  [REDACTED]
19	ĐURINOVIĆ, Antun	1927	Croat	male	1	Missing Person Questionnaire	P00625	Date of Disappearance: 16/10/1991.	[REDACTED]  [REDACTED]  [REDACTED]  [REDACTED]



Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
20	FERIĆ (FURIĆ), Anka (Ana)	1926	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00626	Cause of death was entry wounds of head and back.  Date of Disappearance: 16-17/10/1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
21	FERIĆ (FURIĆ), Juraj (Đuro)	1923	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00627	Cause of death was multiple gunshot injuries of cranium, left humerus and stem.  Date of Disappearance: 16-17/10/1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
22	FERIĆ (FURIĆ), Kata	1925	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00628	Cause of death was an action of a mechanical mean in the head region, which could probably be a shell fired from a hand firearm.  Date of Disappearance: 16-17/10/1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
23	JUKIĆ, Filip	1949	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00629	A clear entry-and-exit wound found at right <i>ilium</i> (trauma to right side of pelvis caused by gunshot wounds). Date of Disappearance: 14/10/1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
24	JUKIĆ, Marija	1924	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00630	The skull is fractured. Date of Disappearance: October 1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
25	KARANOVIĆ, Josip	1935	Croat	male	1	Missing Person Questionnaire	P00631	Date of Disappearance: 17/09/1991.	[REDACTED]  [REDACTED]  [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
26	KARANOVIC, Jozo	un-known	Croat	male					[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
27	KRIVAJIC, Antun	1931	Croat	male	1	Autopsy Report	P00877, p.6-9	Cause of death was probably gunshot wounds.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
28	KRIVAJIC, Reza	un-known	Croat	female					[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
29	KRNIĆ, Mijo	1929	Croat	male	1	Autopsy Report & Report of Death	P00878	Cause of death was fracture of the right ulna, a massive injury to the pelvis from the front and the lateral side (probably penetrating gunshot wound) ( <i>vulnera sclopetaria multiplicia</i> ).	[REDACTED]
					2	Exhumation Report & Missing Person Questionnaire	P00632	Cause of death was fractured right ulna and an extensive anterior and posterior injury to the pelvis (probably shot wounds).  Date of Disappearance: 20/10/1991.	[REDACTED]  [REDACTED] [REDACTED]
30	KRNIĆ, Mijo	un-known	Croat	male					[REDACTED] [REDACTED]
31	KROF (KROPF / KIROF), Barbara	1928	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00633	Cause of death was gunshot wounds of thorax and limbs.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
32	KROF (KROF / KIROF), Pavle (Pavao / Pavae)	1931	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00634	Cause of death was <i>vulnura sclopetaria multiplicia</i> (Multiple gunshot wounds). War was the external cause of violent death. Date of violent death is 20 October 1991.	[REDACTED]
33	KULIŠIĆ, Ivan	1926	Croat	male	1	Autopsy Report & Report of Death	P00879	Probably explosive wounds, completely destroyed head. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00635	Date of Disappearance: 15/10/1991.	[REDACTED]
									[REDACTED]
34	LIKIĆ, Andrija	1908	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00636	Cause of death was <i>vulnus sclopetarium capitis et curis sinistri</i> (gunshot wound). Date of Disappearance: 20/10/1991.	[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
35	LONČAR, Ana (Anka)	1923	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00637	Cause of death was shot wounds to the neck and the right upper leg. Date of Disappearance: 16/08/1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
36	LONČAR, Antun	1909	Croat	male	1	Missing Person Questionnaire	P00638	Date of Disappearance: October 1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
37	LONČAR, Kata	1906	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00639	Cause of death was a mechanical force exerted on the regions of right side of the face and the lower upper legs. It is possible that the resultant fractures were inflicted by projectiles. Date of Disappearance: 16/08/1991.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
38	LONČARIĆ, Nikola	1910	Croat	male	1		Exhumation Report & Missing Person Questionnaire	P00640	Date of Disappearance: 15/11/1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
39	MUCAVAC, Antun	1926	Croat	male	1		Exhumation Report & Missing Person Questionnaire	P00641	Cause of death was an action by mechanical objects that could be bullets fired from a handgun at the head.  Date of Disappearance: October 1991.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]
40	PEZO, Ivo (Ivan)	1910	Croat	Male	1		Autopsy Report & Death Certificate	P00880	Cause of death was <i>vulnera explosive verosimiliter</i> (probably blast injuries).	[REDACTED]
					2		Missing Person Questionnaire	P00642	Date of Disappearance: 15-16/10/1991.	[REDACTED]  [REDACTED] [REDACTED]



Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
41	PEZO, Sofija	1922	Croat	female	1	Autopsy Report & Report of Death	P00881	Cause of death was <i>vulnera sclopetaria corporis</i> (gunshot wounds). War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00643	Date of Disappearance: 15-16/10/1991.	[REDACTED]
42	PIKTJA (PIKTAJA), Anka	1920	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00644	Date of Disappearance: 20/10/1991.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]
43	SABLJAR, Stjepan	1912	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00645	Cause of death was <i>verosimiliter vulnera sclopetarium corporis</i> (multiple gunshots wounds).  Date of Disappearance: August 1991.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
44	ŠESTIĆ, Marija	1922	Croat	female	1	Autopsy Report & Report of Death	P00882	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). War was the external cause of violent death.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Missing Person Questionnaire	P00646	Date of Disappearance: 19-20/10/1991.	[REDACTED]
45	ŠESTIĆ, Marija	un-known	Croat	female					[REDACTED]
46	STANKOVIĆ, Veronika (Vera)	1915	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00647	Date of Disappearance: 13/09/1991.	[REDACTED]
									[REDACTED]
									[REDACTED]
									[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
47	ŠVRACIĆ, Antun	1920	Croat	male	1	Exhumation Report & Missing Person Questionnaire	P00648	Cause of death was <i>vulnus sclopetarium corporis</i> (gunshot wounds).  Date of Disappearance: October 1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
48	ŠVRACIĆ, Marija	1925	Croat	female	1	Exhumation Report & Missing Person Questionnaire	P00649	The upper body extremely bunched up, folded in two, the head is crushed so that the upper jaw is severed from the skull, and the lower jaw is whole.  Date of Disappearance: October 1991.	[REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED]
49	TRINIĆ, Ivan	1913	Croat	male	1	Autopsy Report	P00884	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound to the head entry at front).	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Missing Person Questionnaire	P00650	Date of Disappearance: 03/10/1991.	[REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
50	TRNINIĆ, Ivo	un-known	Croat	male					[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
51	TRNINIĆ, Kata	1925	Croat	female	1	Autopsy Report	P00886		[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Missing Person Questionnaire	P00651	Date of Disappearance: September 1991.	[REDACTED] [REDACTED] [REDACTED]
52	TRNINIĆ, Terezija	1912	Croat	female	1	Missing Person Questionnaire	P00652	Date of Disappearance: October 1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
53	VLADJĆ, Kata (Katarina)	1931	Croat	female	1	Autopsy Report	P00653	Cause of death was extensive firearm wounds to right shoulder and right upper arm.	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]
								[REDACTED]	[REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
Saborsko, Lipovača and Poljanak (Paragraph 28)									
1	BROZINČEVIĆ, Franjo	1930	Croat	male	1	Autopsy Report	P00888	The cause of death was a haemorrhagic shock resulting from a massive pulmonary effusion into the right-hand side of the chest caused by an entry-and-exit wound in the right side of the chest. The bullet track, which runs from the right-hand side at the level of the <i>nemila</i> , had damaged the lungs and caused massive bleeding and a haemorrhagic shock. Also detected was a defect on the right forearm which, judging by the traces found on the clothes, might have been inflicted by bullets fired from infantry weapons.	[REDACTED]
					2	Missing Person Questionnaire	P00654		
2	BROZINČEVIĆ, Marija	1943	Croat	female	1	Autopsy Report	P00888	Cause of death most probably by bullets fired from a handgun into the right-hand side of the chest, which caused injury to the right lung.	[REDACTED]
					2	Missing Person Questionnaire	P00655		
3	BROZINČEVIĆ, Mata (Mate)	1924	Croat	female	1	Autopsy Report	P00888	Was killed by a gunshot. A broken arm indicated that a projectile had hit the arm. The head was also partly smashed.	[REDACTED]
					2	Missing Person Questionnaire	P00656		

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
4	BROZINČEVIĆ, Mira	1936	Croat	female	1	Autopsy Report	P00888	Cause of death was most probably the injury to the right-hand side of the pelvic bone and the right-hand side of the chest.	[REDACTED]
					2	Missing Person Questionnaire	P00657	Date of Disappearance: 28/10/1991.	[REDACTED]
5	BROZINČEVIĆ, Mirko	1962	Croat	male	1	Autopsy Report	P00888	According to the statement, the deceased was shot through the neck, which gives rise to the assumption that he sustained injuries to large blood vessels and bled to death suffering from haemorrhagic shock.	[REDACTED]
					2	Missing Person Questionnaire	P00658	Date of Disappearance: 29/10/1991.	[REDACTED]
6	BROZINČEVIĆ, Roža	1924	Croat	female	1	Autopsy Report	P00888	Death was probably caused by multiple fractures to the cranial vault and base, and the ensuing brain injury inflicted by a mechanical instrument, which in this case may have been a bullet from a handgun.	[REDACTED]
					2	Missing Person Questionnaire	P00659	Date of Disappearance: 29/10/1991.	[REDACTED]
7	CINDRIČ (CINDRIĆ), Katarina (Katja)	1925	Croat	female	1	Autopsy Report	P00888	Death was caused by a haemorrhagic shock and massive pulmonary effusion as a result of two entry-and-exit wounds to the right-hand side of the chest probably caused by bullets fired from infantry weapons.	[REDACTED]
					2	Missing Person Questionnaire	P00660	Date of Disappearance: 28/10/1991.	[REDACTED]



Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
8	LONČAR, Ivica (Ivan)	1908	Croat	male	1	Autopsy Report	P00889	Violent death, and the most likely cause of death was hanging.	[REDACTED]
9	LONČAR, Milan	1945	Croat	Male	1	Autopsy Report	P00889	Violent death, and the most likely cause of death was hanging.	[REDACTED]
10	VUKOVIĆ, Ivan (Ivica)	1934	Croat	male	1	Autopsy Report	P00889	Violent death, and the cause of death was gunshot entry-and-exit wounds to the head and trunk.	[REDACTED]
11	VUKOVIĆ, Nikola	1926	Croat	male	1	Autopsy Report	P00889	Violent death, and the cause of death was multiple gunshot entry-and-exit wounds to the thorax and head.	[REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
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Vukovići (Paragraph 30)

1	MATOVINA, Josip (Joso)	1940	Croat	male	1	Autopsy Report	P00889	Very probably burned in a house with 6 other persons from the same village.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]
2	MATOVINA, Nikola	un-known	Croat	male	1	Autopsy Report	P00889	Very probably burned in a house with 6 other persons from the same village.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]
3	VUKOVIĆ, Dane	un-known	Croat	male	1	Autopsy Report	P00889	Very probably burned in a house with 6 other persons from the same village.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
4	VUKOVIĆ, Dane	1917	Croat	male	1	Autopsy Report	P00889	Very probably burned in a house with 6 other persons from the same village.	[REDACTED]
					2	Missing Person Questionnaire	P00661	Date of Disappearance: 07/11/1991.	[REDACTED]
5	VUKOVIĆ, Lucija	un-known	Croat	female					[REDACTED]
6	VUKOVIĆ, Milka	un-known	Croat	female	1	Autopsy Report	P00889	Very probably burned in a house with 6 other persons from the same village.	[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	VUKOVIĆ, Nikola (Nicola)	un-known	Croat	male	1	Autopsy Report	P00889	Very probably burned in a house with 6 other persons from the same village.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]
8	VUKOVIĆ, Vjekoslav	1939	Croat	male	1	Autopsy Report	P00889	Very probably burned in a house with 6 other persons from the same village.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
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**Saborsko (Paragraph 31)**

1	BIČANIĆ, Ana	1924	Croat	female	1	Autopsy Report	P00890	Date of Disappearance: 12/11/1991.	[REDACTED]
					2	Missing Person Questionnaire	P00662		[REDACTED]
2	BIČANIĆ, Milan	1927	Croat	male	1	Autopsy Report	P00891	Date of Disappearance: 12/11/1991.	[REDACTED]
					2	Missing Person Questionnaire	P00663		[REDACTED]
3	BIČANIĆ, Nikola	1928	Croat	male	1	Autopsy Report	P00892	Date of Disappearance: 12/11/1991.	[REDACTED]
					2	Missing Person Questionnaire	P00664		[REDACTED]
4	BIČANIĆ (KRTAN), Petar (Pera)	1935	Croat	male	1	Autopsy Report	P00893	Date of Disappearance: 12/11/1991.	[REDACTED]
					2	Missing Person Questionnaire	P00665		[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
5	BIČANIĆ, Pero	un-known	Croat	male					[REDACTED] [REDACTED] [REDACTED]
6	CONJAR, Leopold	1898	Croat	male	1	Autopsy Report	P00894	Cause of death was entry-and-exit gunshot injury to the chest from the left side, and the death was violent.	[REDACTED]
					2	Missing Person Questionnaire	P00666	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED]
7	DUMENČIĆ, Darko	1970	Croat	male	1	Autopsy Report	P00895	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00667	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED] [REDACTED]
8	DUMENČIĆ, Kata	1930	Croat	female	1	Autopsy Report	P00896	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound).	[REDACTED]
					2	Missing Person Questionnaire	P00668	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
9	DUMENČIĆ, Nikola	1930	Croat	male	1	Autopsy Report	P00897		[REDACTED]	[REDACTED]
					2	Missing Person Questionnaire	P00669	Date of Disappearance: 12/11/1991.	[REDACTED]	
									[REDACTED]	
10	DUMENČIĆ, Ivica	1972	Croat	male	1	Autopsy Report	P00898	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]	[REDACTED]
					2	Missing Person Questionnaire	P00670	Date of Disappearance: 12/11/1991.	[REDACTED]	
									[REDACTED]	
11	DUMENČIĆ, Ante	1962	Croat	male	1	Exhumation Report	P00899	During the occupation of Sabrosko in 1991 he was wounded by hostile paramilitary formations with a firearm in the stomach and as a result of the wounds he died several hours later.	[REDACTED]	[REDACTED]
					2	Missing Person Questionnaire	P00671	Date of Disappearance: 12/11/1991.	[REDACTED]	
									[REDACTED]	
12	MATOVINA, Ivan	1930	Croat	male	1	Exhumation Report	P00899	He died in his house during the occupation of Sabrosko by hostile formations, after which the house where he was killed was set on fire.	[REDACTED]	[REDACTED]
					2	Missing Person Questionnaire	P00672	Date of Disappearance: 12/11/1991.	[REDACTED]	
									[REDACTED]	

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
13	MATOVINA, Kata	1920	Croat	female	1	Autopsy Report	P00900	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00673	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED]
14	MATOVINA, Kata	1918	Croat	female	1	Autopsy Report & Death Certificate	P00901	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00674	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED]
15	MATOVINA, Lucija	1906	Croat	female	1	Autopsy Report	P00902	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00675	Date of Disappearance: 14/11/1991.	[REDACTED] [REDACTED]
16	MATOVINA, Marija	1909	Croat	female	1	Autopsy Report	P00903	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00676	Date of Disappearance: 15/11/1991.	[REDACTED] [REDACTED]



Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
17	MATOVINA, Marta	1918	Croat	female	1	Autopsy Report	P00904	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00677	Date of Disappearance: 12/11/1991.	[REDACTED]
18	MATOVINA, Mate	1895	Croat	male	1	Autopsy Report	P00905		[REDACTED]
					2	Missing Person Questionnaire	P00678	Date of Disappearance: 12/11/1991.	[REDACTED]
19	MATOVINA, Mate	un-known	Croat	male					[REDACTED]
20	MATOVINA, Milan	1946	Croat	male	1	Autopsy Report	P00906		[REDACTED]
					2	Missing Person Questionnaire	P00679	Date of Disappearance: 12/11/1991.	[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
21	MATOVINA, Slavica	1959	Croat	female	1	Autopsy Report	P00907	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00680	Date of Disappearance: 12/11/1991.	[REDACTED]
22	SERTIĆ, Slavko	1941	Croat	male	1	Autopsy Report	P00908	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00681	Date of Disappearance: 12/11/1991.	[REDACTED]
23	ŠPEHAR, Mate	1960	Croat	male	1	Autopsy Report	P00909		[REDACTED]
					2	Missing Person Questionnaire	P00682	Date of Disappearance: 12/11/1991.	[REDACTED]
24	ŠTRK, Joso (Josip)	1934	Croat	male	1	Autopsy Report	P00910		[REDACTED]
					2	Missing Person Questionnaire	P00683	Date of Disappearance: 12/11/1991.	[REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
25	ŠTRK, Juraj	1931	Croat	male	1	Missing Person Questionnaire	P00684	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
26	VUKOVIĆ, Ivan	1931	Croat	male	1	Autopsy Report	P00911		[REDACTED] [REDACTED]
					2	Missing Person Questionnaire	P00685	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
27	VUKOVIĆ, Jeka (Jela)	1930	Croat	female	1	Autopsy Report	P00912	Cause of death was <i>vulnera sclopetaria</i> (gunshot wound). Date of violent death was 12 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00686	Date of Disappearance: 12/11/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
28	VUKOVIĆ, Jure	1929	Croat	male	1	Autopsy Report	P00913	Date of Disappearance: 12/11/1991.	[REDACTED]
					2	Missing Person Questionnaire	P00687		[REDACTED]
29	VUKOVIĆ, Jure	1930	Croat	male	1	Autopsy Report	P00914	Date of Disappearance: 12/11/1991.	[REDACTED]
					2	Missing Person Questionnaire	P00688		[REDACTED]
30	VUKOVIĆ, Petar	1932	Croat	male	1	Autopsy Report	P00915	Date of Disappearance: 12/11/1991.	[REDACTED]
					2	Missing Person Questionnaire	P00689		[REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
<b>Škabrnja (Paragraph 32)</b>									
1	BABIĆ, Ivan	1941	Croat	male	1	Autopsy Report	P00916, p.24-25	Death occurred as a result of the crushing of the brain and haemorrhagic shock due to bleeding into the thorax caused by shrapnel. Explosive wounds to the head and chest.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.5	Penetrating wounds to head and chest, contused brain and haemorrhagic shock.	[REDACTED]
									[REDACTED]
2	BILAVER, Luka	1899	Croat	male	1	Autopsy Report	P00917	Died in Škabrnja on 1 December 1991. Based on the haemorrhagic defects of the stomach it is concluded that the immediate cause of death was freezing.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.5	Hypothermia.	[REDACTED]
3	BILAVER, Grgo	1915	Croat	male	1	Autopsy Report	P00916, p.15-17	Cause of death was a haemorrhagic shock. An entry-and-exit wound through the thorax with the entrance wound in the left arm and the exit wound on the right side of the back. The path of the projectile goes through both lungs with resulting lacerations and bleedings in the thoracic cavity.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.5	Penetrating wound to chest.	[REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
4	BILAVER, Peka	1927	Croat	male	1	Autopsy Report	P00916, p.19-20	Death occurred due to a substantial crushing of the brain caused by the passage of a projectile from the left to the right side.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.6	Penetrating wound to head.	[REDACTED]
5	BRKIĆ, Jozo (Joso)	1924	Croat	male	1	Autopsy Report	P00918	Killed in Škabrnja on 18 November 1991. Cause of death was gunshot wounds, three on head, one on neck, one on chest, one on stomach and one on right arm ( <i>conquassatio cerebri</i> ).	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.6	Penetrating wound to right ear and cheek from point-blank range (contused brain).	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
6	BRKIĆ, Marija	1943	Croat	female	1	Autopsy Report	P00919	Killed in Škabrnja on 18 November 1991. Cause of death was gunshot wounds to the head, three entry wounds on left side ( <i>conquassatio cerebri</i> ).	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.6-7	Penetrating wound to head from close range.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	BRKIĆ, Marko	1943	Croat	male	1	Autopsy Report	P00920	Killed in Škabrnja on 18 November 1991. Cause of death was gunshot wounds to the head, neck and right arm ( <i>conquassatio cerebri</i> ).	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.7	Penetrating wound to back of head from point-blank range (contused brain).	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
8	BRKIĆ, Ana	1925	Croat	female	1	Exhumation Report	P00916, p.20-22	Cause of death was crushing of the brain.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.6	Shrapnel wound to head.	[REDACTED] [REDACTED]
9	BRKIĆ, Kata	1935	Croat	female	1	Exhumation Report	P00921, p.3-4	Cause of death was traumatic haemorrhagic shock.	[REDACTED] [REDACTED]
10	BRKIĆ, Kata	1939	Croat	female	1	Exhumation Report	P00921, p.4-6	Cause of death was a brain contusion. In the parietal region, there was a star-shaped entry gunshot wound with the traces of haemorrhage of the scalp, the bone and the hard brain membrane.	[REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
					Source#						
11	BRKIĆ, Marija	1906	Croat	female	1		Exhumation Report	P00922, p.2-3	The death was caused by extensive brain contusion resulting from blows with a blunt instrument to the right temporal area, and haemorrhagic shock resulting from haemorrhage in the right torax caused by an entry-and-exit wound in the right lung.	[REDACTED]	[REDACTED]
12	BRKIĆ, Mijat	1915	Croat	male	1		Autopsy Report	P00916, p.6-8	The death was violent, directly caused by haemorrhagic shock.	[REDACTED]	[REDACTED]
					2		List of Persons killed in Škabrnja	P00294, p.7	Penetrating wound to chest - haemorrhagic shock.	[REDACTED]	[REDACTED]
13	BILAVER, Stanko	1957	Croat	male	1		List of Persons killed in Škabrnja	P00294, p.1	On combat mission during one of many shelling attacks by Chetniks.	[REDACTED]	[REDACTED]
14	ČURKOVIĆ, Željko	1968	Croat	male	1		Autopsy Report	P00923	Murdered in Škabrnja on 18 November 1991. Cause of death was gunshot wounds to the head, back, stomach and right leg, eight entrance wounds, one on lower jaw, one on stomach, one on lumbar region near kidney, and three on right arm ( <i>shock traumaticum et haemorrhagicum</i> ).	[REDACTED]	[REDACTED]
										[REDACTED]	[REDACTED]
										[REDACTED]	[REDACTED]
										[REDACTED]	[REDACTED]



Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#		Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
15	ERLIĆ, Jure	1905	Croat	male	1		Exhumation Report	P00916, p.8-9	Death occurred due to haemorrhagic shock caused by bleeding. The shape of wounds indicates shrapnel wounds.	[REDACTED]	
					2		List of Persons killed in Škabrnja	P00294, p.7	Penetrating wound to chest - haemorrhagic shock.	[REDACTED]	
16	GOSPIĆ, Duniča	1914	Croat	female	1		Exhumation Report	P00916, p.18-19	Cause of death was a haemorrhagic shock and defective shock.	[REDACTED]	
					2		List of Persons killed in Škabrnja	P00294, p.7-8	Shrapnel wounds.	[REDACTED]	
17	HORVAT, Vladimir (Vlado)	1953	Croat	male	1		Autopsy Report	P00924	Murdered in Škabrnja on 18 November 1991. Cause of death was gunshot wounds to head, back, chest and right arm. Total of five gunshot wounds, including one on head entry at back, two entry in back of chest, and one on right arm ( <i>conquassatio cerebri</i> ).	[REDACTED]	
					2		List of Persons killed in Škabrnja	P00294, p.2	During fierce tank and infantry attack on village by Chetniks.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	
18	IVKOVIĆ, Šime	1947	Croat	male	1		List of Persons killed in Škabrnja	P00294, p.2	During one of many shelling and bombing attacks on Zadar and surroundings by Chetniks.	[REDACTED] [REDACTED]	

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
19	IVKOVIĆ, Marko	1972	Croat	male	1	List of Persons killed in Škabrnja	P00294, p.8	Death by natural causes - pneumonia.	[REDACTED]
					2	Witness Statement	P00288, p.6	There are indications that Marko IVKOVIĆ was killed during or after the attack on Škabrnja.	[REDACTED]
20	IVKOVIĆ, Ljubomir	1912	Croat	male	1	Exhumation Report	P00921, p.12-13	Death occurred as the result of the entry-and-exit wound to the cardiac muscle and the brain contusion caused by skull fractures, which were all caused by the fragments of an explosive device (shell).	[REDACTED]
					2	Missing Person Questionnaire	P00690	Date of Disappearance: 19/11/1991.	[REDACTED]
					3	List of Persons killed in Škabrnja	P00294, p.8	Penetrating wound to chest - heart rupture.	[REDACTED]
21	IVKOVIĆ, Nedjeljko	1952	Croat	male	1	Autopsy Report	P00916, p.11-12	Death occurred as a consequence of haemorrhagic shock resulting from two gunshot wounds to the chest.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.2	During fierce tank and infantry attack on village by Chetniks.	[REDACTED]
22	IVKOVIĆ, Tereza	1920	Croat	female	1	Exhumation Report	P00922, p.5-6	Death was caused by brain contusion, resulting from a blow dealt from above with a sharp, pointed instrument.	[REDACTED]
					2	Missing Person Questionnaire	P00691	Date of Disappearance: 19/11/1991.	[REDACTED]
					3	List of Persons killed in Škabrnja	P00294, p.8	Head struck by sharp pointed object - contused brain.	[REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
					Source#						
23	IVKOVIĆ, Jakov	1956	Croat	male	1		List of Persons killed in Škabrnja	P00294, p.2	During one of many shelling and bombing attacks on Zadar and surroundings by Chetniks.	[REDACTED]	[REDACTED]
24	JURIĆ, Ana (Anica)	1914	Croat	female	1		Autopsy Report	P00926	Murdered in Škabrnja on 18 November 1991. Cause of death was explosive wound to the head ( <i>conquassatio cerebri</i> ).	[REDACTED]	[REDACTED]
					2		List of Persons killed in Škabrnja	P00294, p.8	Blast wound to head - contused brain.	[REDACTED]	[REDACTED]
25	JURIĆ, Grge (Grgo)	1909	Croat	male	1		Autopsy Report	P00927	Killed in Škabrnja on 18 November 1991. Cause of death was gunshot wounds to the head, chest, stomach and left upper arm ( <i>conquassatio cerebri</i> ).	[REDACTED]	[REDACTED]
					2		List of Persons killed in Škabrnja	P00294, p.8	Penetrating wound to head (contused brain).	[REDACTED]	[REDACTED]
26	JURIĆ, Petar	1936	Croat	male	1		Autopsy Report	P00928	Killed in Škabrnja on 18 November 1991. Cause of death was gunshot wounds to face, neck and chest ( <i>conquassatio medullae spinalis cervicalis</i> ).	[REDACTED]	[REDACTED]
					2		List of Persons killed in Škabrnja	P00294, p.9	Penetrating wound to head (contused brain).	[REDACTED]	[REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
27	JURJEVIĆ, Šimica	1912	Croat	female	1	Exhumation Report	P00916, p.9-11	Cause of death was compression of the head and thorax. Compression was caused by being run over by a heavy goods or military vehicle.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.9	Run over by heavy vehicle - contused head and chest.	[REDACTED]
28	JURIĆ, Nediljko	1955	Croat	male	1	List of Persons killed in Škabrnja	P00294, p.2-3	During fierce tank and infantry attack on village by Chetniks.	[REDACTED]
									[REDACTED]
									[REDACTED]
									[REDACTED]
29	KARDUM, Mirko	1919	Croat	male	1	Exhumation Report	P00916, p.2-3	Death occurred as a consequence of haemorrhagic shock caused by extensive internal bleeding in the thoracic cavity and abdomen, resulting from multiple penetrating shrapnel wounds.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.9	Blast wound to chest and abdomen.	[REDACTED]
30	MILJANIĆ, Josip (Jozo)	1928	Croat	male	1	Autopsy Report	P00929	Killed in Škabrnja on 18 November 1991. Gunshot wounds to the head and the back. Cause of death was <i>shock haemorrhagicum</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.9	Penetrating wound to face from close range (traumatic and haemorrhagic shock).	[REDACTED]
									[REDACTED]
									[REDACTED]
									[REDACTED]
									[REDACTED]

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
31	MILJANIĆ, Jozo	un-known	Croat	male					[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
32	MILJANIĆ, Slavko	1956	Croat	male	1	Autopsy Report	P00930	Killed in Škabrnja on 18 November 1991. Gunshot wounds to chest, stomach, all together 9 gunshot wounds, of which 5 to the chest and two to the stomach. Cause of death was <i>shock traumaticum et haemorrhagicum</i> .	[REDACTED]	
					2	List of Persons killed in Škabrnja	P00294, p.3	During fierce tank and infantry attack on village by Chetniks.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
33	PAVIČIĆ, Noko (Niko)	1922	Croat	male	1	Autopsy Report	P00931	Killed in Škabrnja on 18 November 1991. Gunshot wounds to head and chest. One on head entrance at the nose and exit at back of head, one at front of the chest. Cause of death was <i>conquassatio cerebri</i> .	[REDACTED]	
					2	List of Persons killed in Škabrnja	P00294, p.9	Penetrating wound to face from point-blank range (contused brain).	[REDACTED] [REDACTED] [REDACTED]	

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
34	PAVIČIĆ, Petar	1942	Croat	male	1	Autopsy Report	P00932	Killed in Škabrnja on 18 November 1991. Gunshot injuries to head, neck and left arm. On head entrance at left ear, at neck entrance at back. Cause of death was <i>conquassatio et destruction partialis cerebri</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.10	Penetrating wound to back of head form point-blank range and on right auricle (contused brain and neck spinal cord).	[REDACTED]
									[REDACTED]
									[REDACTED] [REDACTED] [REDACTED]
35	PAVIČIĆ, Pešo	un-known	Croat	male					[REDACTED] [REDACTED] [REDACTED]
36	PAVIČIĆ, Mile	1965	Croat	male	1	Autopsy Report	P00933	Killed in Škabrnja on 18 November 1991. Gunshot wounds to head and left arm. Two gunshot wounds total one entry right of head to left at close range, and the other at palm of his hand. Cause of death was <i>conquassatio cerebri, cerebelli, pontis et medullae oblongatae</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.3	During fierce tank and infantry attack on village by Chetniks.	[REDACTED] [REDACTED]
									[REDACTED]
									[REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
37	PERIĆ, Josip	un-known	Croat	male					[REDACTED]
38	PERICA, Joso	1934	Croat	male	1	Autopsy Report	P00934	Murdered in Škabrnja on 18 November 1991. Gunshot wound to the head, chest, stomach and both arms. Nine gunshot wounds, from which six are on back side and one on left cheek. Cause of death was <i>shock traumaticum et haemorrhagicum</i> .	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
39	PERICA, Josip	1934	Croat	male	1	Autopsy Report	P00925, p.1-3	Murdered in Škabrnja on 18 November 1991. Gunshot wound to the head, chest, stomach and both arms. Nine gunshot wounds, from which six are on back side and one on left cheek. Cause of death was <i>shock traumaticum et haemorrhagicum</i> .	[REDACTED] [REDACTED] [REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.10	Penetrating wound (traumatic and haemorrhagic shock caused by penetrating wounds to abdomen, chest and upper limbs).	[REDACTED] [REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
40	PERICA, Gašpar	1955	Croat	male	1	Autopsy Report	P00935	Killed in Škabrnja on 18 November 1991. Gunshot wounds to head, chest, pelvis and left arm. Two entrance wounds on back of head with description signifying that they are from very close range practically on the skin, and five on backside, clearly killed from behind. Cause of death was <i>conquassatio cerebri, cerebelli et pontis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.3	During fierce tank and infantry attack on village by Chetniks.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
41	PERICA, Ljubo	1932	Croat	male	1	Autopsy Report	P00936	Killed in Škabrnja on 18 November 1991. Gunshot wounds to head, neck, chest, stomach and right leg. Total of 6 gunshot wounds, one on left cheek, one on front of neck, one on chest, one on stomach and one on right leg. Cause of death was <i>conquassatio medullae spinalis cervicalis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.10	Penetrating wound to neck from close range (contused neck spinal cord).	[REDACTED] [REDACTED] [REDACTED]



Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
42	RAŽOV, Danica	1924	Croat	female	1	Autopsy Report	P00937	Died in Škabrnja on 2 December 1991. The cause of death could have been twofold: first cause of death was <i>congelatio</i> and second possible cause of death was <i>encephalomalacia pontis atherosclerotica</i> (according to pathologist who performed autopsy cause of death was freezing).	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.10	Hypothermia in Škabrnja.	[REDACTED]
43	RAŽOV, Ilija	un-known	Croat	male					[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
44	RAŽOV, Ivan	1927	Croat	male	1	Autopsy Report	P00938	Killed in Škabrnja on 18 November 1991. Gunshot injuries to neck and stomach, two on neck from under the front jaw from a distance, and on stomach on back side. Cause of death was <i>conquassatio medullae spinalis cervicalis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.11	Penetrating wound to neck from close range (contused neck marrow).	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
									[REDACTED]
45	RAŽOV, Jela	1905	Croat	female	1	Autopsy Report	P00939	Killed in Škabrnja on 18 November 1991. Gunshot wounds to head and neck. Cause of death was <i>conquassatio cerebri et medullae spinalis cervicalis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.11	Penetrating wound to head and neck - contused brain and neck spinal cord.	[REDACTED]
									[REDACTED]
46	RAŽOV, Šime (Simo)	1938	Croat	male	1	Exhumation Report	P00916, p.17-18	Death was the result of crushing and bleeding of the brain caused by a gunshot wound, and considering the described injuries on the skeleton, a great force was also inflicted on the body over its entire surface by a vehicle or a tank.	[REDACTED]
					2	Missing Person Questionnaire	P00692		[REDACTED]
					3	List of Persons killed in Škabrnja	P00294, p.11	Penetrating wound to head - contused brain.	[REDACTED]
47	RAŽOV, Grgica	1899	Croat	female	1	Exhumation Report	P00916, p.12-14	The injuries described represent a gunshot wound to the head, considering the multiple fractures of all the bones and the cranial vault, and the extremely large exit wound in the form of the described laceration of the soft tissue of the head, which leads to the conclusion that the wound was inflicted from close range. Cause of death was crushing of the brain.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.10-11	Penetrating wound to head - contused brain.	[REDACTED]
					1	Exhumation Report	P00916, p.14-15	Death occurred as a result of haemorrhagic shock caused by an entry and exit wound in the left lung and bleeding in the thoracic cavity.	[REDACTED]
48	RAŽOV, Marko	1920	Croat	male	2	List of Persons killed in Škabrnja	P00294, p.11	Penetrating wounds to chest.	[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
49	RAŽOV, Ante	1955	Croat	male	1	Autopsy Report	P00299	Gunshot wounds to head from close range on right cheek, injury on neck consistent with strangulation, left ear cut off with a sharp object, hematomas and bruises on face and left eye, left kidney, reproductive organs, right lumbar region, left leg, all consistent with beatings. Cause of death was <i>conquassatio cerebri, cerebelli, pontis et medullae oblongatae</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.3-4	During fierce tank and infantry attack on village by Chetniks.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
50	ROGIĆ, Branko	un-known	Croat	male					[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
51	ROGIĆ, Marko (Ćave)	1959	Croat	male	1	Autopsy Report	P00940	Murdered in Škabrnja on 18 November 1991. Eight gunshot wounds, two on head, one of which entered at left ear and other entered at right lower jaw, two on chest, one on backside, three on arm. Cause of death was <i>conquassatio cerebri</i> . Concurrent cause of death was <i>shock traumaticum et haemorrhagium</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.4	During fierce tank and infantry attack on village by Chetniks.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
52	ROGIĆ, Kata (Soka)	1932	Croat	female	1	Autopsy Report	P00941	Shot and run over by a tank in Škabrnja on 18 November 1991. Extreme gunshot wounds to chest from something more powerful than a revolver. Also, head, neck, chest and stomach and lower extremities crushed consistent with being run over by a tank or truck. Highly likely that she was killed first and then run over. Cause of death was <i>conquassatio capitis, colli, thoracis et abdominis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.11	Contused head and chest caused by being run over by a tank.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
								[REDACTED]	[REDACTED]
53	ROGIĆ, Nikola	1930	Croat	male	1	Autopsy Report	P00942	Murdered in Škabrnja on 18 November 1991. Gunshot wounds to the head, chest, stomach and left arm. 13 gunshot wounds, two on the head, entrance right temporal region and also 10 gunshot wounds on the back side. Cause of death was <i>conquassatio cerebri</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.11	Penetrating wound to head from point-blank range - contused brain.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
54	ROGIĆ, Nikola	1939	Croat	male					[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
									[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
55	ŠEGARIĆ, Grgica (Maja)	1911	Croat	female	1	Autopsy Report	P00943	Killed in Škabrnja on 18 November 1991. Killed with three bullets from the distance of more than one meter - two bullets in the chest and one in the left forearm, which she probably used to defend herself. Died of haemorrhagic shock caused by bleeding from the lungs into the chest. Cause of death was <i>shock haemorrhagicum</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.12	Penetrating wounds to head (haemorrhagic shock caused by penetrating wounds to chest).	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
56	ŠEGARIĆ, Kljajo	un-known	Croat	male					[REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED]
57	ŠEGARIĆ, Krsto	1927	Croat	male	1	Autopsy Report	P00944	Killed in Škabrnja on 18 November 1991. Two gunshot wounds, one to the left cheek and the other one on left lower jaw. Cause of death was <i>conquassatio medullae spinalis cervicalis</i> and competing cause of death was <i>shock haemorrhagicum</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.12	Penetrating wound to face and neck from close range, contused neck spinal cord.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]
58	ŠEGARIĆ, Luca (Lucia, Luce, Lucia)	1922	Croat	female	1	Exhumation Report	P00916, p.22-24	Cause of death was crushing of the brain caused by a gunshot wound inflicted from close range.	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.12	Penetrating wound to head - contused brain.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
59	ŠEGARIĆ, Rade	1931	Croat	male	1	Autopsy Report	P00945	Killed in Škabrnja on 18 November 1991. Two gunshot wounds to the head, one of them has entrance on the back side and the other one under lower jaw from the right side (both from short distance, weapon leaning on the head). Cause of death was <i>contusio cerebri, pontis et cerebelli</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.12	Penetrating wound to head - contused brain.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
60	ŠEGARIĆ, Vice	1933	Croat	male	1	Autopsy Report	P00946	Killed in Škabrnja on 18 November 1991. Four gunshot wounds, two on the head, one of them to the back side of the head and the other one on the right back side (both from the close distance, weapon leaning on the head). Third gunshot wound to the back side of the neck and fourth in stomach region. Cause of death was <i>conquassatio cerebri, pontis et cerebelli</i> and alternate cause of death was <i>conquassatio medullae spinalis cervicalis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.12	Penetrating wounds to back of head from point-blank range (contused brain).	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
61	ŠEGARIĆ, Bude	1959	Croat	male	1	Autopsy Report	P00948	Direct cause of death was multiple bodily injuries. All injuries together represent a serious and fatal bodily injury. The injuries were caused by another person and were inflicted by a blunt instrument. Cause of death was <i>laestiones multiplicis corporis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.4	Captured, tortured and beaten to death.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
62	ŠEGARIĆ, Ivica (Ivica)	1961	Croat	male	1	Autopsy Report	P00949	Killed in Škabrnja on 18 November 1991. Gunshot wounds to the head, one entrance at the back side with gunpowder marks on the skin indicating shot at close range. Cause of death was <i>conquassatio cerebri et cerebelli</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.4	During fierce tank and infantry attack on village by Chetniks.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]



Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
63	ŠEGARIĆ, Miljenko (Šime)	un-known	Croat	male	1	Autopsy Report	P00950	The external examination and a reduced autopsy have established that multiple physical injuries are the immediate cause of death. All the injuries together constitute a serious and fatal physical injury. The injuries to the body were inflicted by another person, using a blunt instrument. Cause of death was <i>laesionis multiplices corporis (multiple physical injuries)</i> .	[REDACTED]	
					2	List of Persons killed in Škabrnja	P00294, p.4	Captured, tortured and beaten to death.	[REDACTED]	[REDACTED]
64	ŠKARA, Nediljko (Nede)	1955	Croat	male	1	Autopsy Report	P00951	Murdered in Škabrnja on 18 November 1991. Eight gunshot wounds, on the back side, on the stomach and both legs. Cause of death was <i>shock traumaticum et haemorrhagicum</i> .	[REDACTED]	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.5	Captured and killed while attempting to escape at level crossing.	[REDACTED]	[REDACTED]
									[REDACTED]	[REDACTED]
65	ŠKARA, Pera	1937	Croat	Female	1	Exhumation Report	P00921, p.10-12	Death was caused by shell fragments, which hit the left side of the body, causing extensive haemorrhage that resulted in haemorrhagic shock, which together with multiple trauma was the immediate cause of death.	[REDACTED]	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.13	Blast wounds to trunk - haemorrhagic shock.	[REDACTED]	[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
66	STURA, Božo	1937	Croat	male	1	Exhumation Report	P00921, p.6-7	Two injuries on the forehead, which had been inflicted with a hard, sharp instrument caused brain contusion. The cause of death was brain contusion.	[REDACTED]
					2	Missing Person Questionnaire	P00693		[REDACTED]
67	STURA, Draginja	1917	Croat	female	1	Exhumation Report	P00922, p.3	Death was caused by the haemorrhagic shock resulting from the haemorrhage into the abdomen and the pelvis, and massive brain contusion, both caused by multiple gunshot wounds.	[REDACTED]
					2	Missing Person Questionnaire	P00694		[REDACTED]
68	VICKOVIĆ, Stana	1936	Croat	female	1	Autopsy Report	P00952	Two gunshot injuries, one to the head and one to the lower right leg. Cause of death was <i>conquassatio cerebri</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.13	Penetrating wounds to crown of head from point-blank range (contused brain).	[REDACTED]
									[REDACTED]
									[REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
69	VICKOVIĆ, Stanko	1956	Croat	male	1	Autopsy Report	P00953	Murdered in Škabrnja on 18 November 1991. There are four entry-exit wounds, one in the head and three in the chest cavity. Cause of death was <i>conquassatio cerebri et cerebellum</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.5	During fierce tank and infantry attack on village by Chetniks.	[REDACTED]
									[REDACTED]
70	ZILIĆ, Mara	1914	Croat	female	1	Autopsy Report	P00954	Killed in Škabrnja on 18 November 1991. Five gunshot injuries, on the back side of the chest, stomach and right arm. Cause of death was <i>shock traumaticum et haemorrhagicum</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.13	Penetrating wounds (traumatic and haemorrhagic shock caused by penetrating wounds to chest, abdomen and right forearm).	[REDACTED]
									[REDACTED]
71	ZILIĆ, Milka	1940	Croat	female	1	List of Persons killed in Škabrnja	P00294, p.13	Killed by shrapnel of enemy artillery shell during Chetnik attack on Škabrnja.	[REDACTED]
									[REDACTED]
									[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
72	ZILJIĆ, Pavica	1928	Croat	female	1	Autopsy Report	P00955	Killed in Škabrnja on 18 November 1991. Explosive injuries of the chest and stomach. Cause of death was <i>shock traumaticum et haemorrhagicum</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.13	Blast wound to abdomen (traumatic and haemorrhagic shock).	[REDACTED]
									[REDACTED] [REDACTED] [REDACTED]
73	ZILJIĆ, Roko	1929	Croat	male	1	Autopsy Report	P00956	Murdered in Škabrnja on 18 November 1991. Six gunshot wounds, two on the head, two on the stomach, one on the chest and one on the both legs. Cause of death was <i>conquassatio cerebri, cerebelli, pontis ac medullae oblongatae et cervicalis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.14	Penetrating wound to back of head from point blank range (contused brain).	[REDACTED]
									[REDACTED]
									[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
74	ZILJIĆ, Tadija	1927	Croat	male	1	Autopsy Report	P00957	Killed in Škabrnja on 18 November 1991. Ten gunshot wounds, three on the head, entrance right ear, right side of mouth and right side of the lower jaw. Also one gunshot wound on the neck, one on the chest, two on the stomach region and others on extremities. Cause of death was <i>conquassatio medullae spinalis cervicalis</i> .	[REDACTED]
					2	List of Persons killed in Škabrnja	P00294, p.14		[REDACTED]
									[REDACTED]
									[REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
<b>Bruška (Paragraph 35)</b>									
1	DRAČA, Sveto (Svetozar)	1957	Serb	male					[REDACTED] [REDACTED]  [REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
2	MARINOVIĆ, Dragan (Josip)	1967	Croat	male	1	Exhumation & Autopsy Report	P00960, p.2-5	Cause of death was traumatic haemorrhagic shock. Gunshot wounds to the chest. Four gunshot wounds entries from front to back, passing through both lungs.	[REDACTED]
					2	Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
3	MARINOVIĆ, Draganja (Drasa, Jovan)	1930	Croat	female	1		Exhumation & Autopsy Report	P00958, p.9-11	Injuries to the chest, right arm and left leg caused by gunshot wounds.	[REDACTED]
					2		Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
4	MARINOVIĆ, Duško (Dušan)	1957	Croat	male	1		Exhumation & Autopsy Report	P00961, p.3-5	Gunshot wounds to the head at the lower jaw, to the left chest and to the stomach, all entries from front and the gunshot canals are oriented from the front towards the back.	[REDACTED]
					2		Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
5	MARINOVIĆ, Ika	1940	Croat	female	1	Exhumation & Autopsy Report	P00960, p.5-7	Gunshot wounds to the chest entry from back, and also to the right arm and leg. Cause of death was traumatic haemorrhagic shock.	[REDACTED]
					2	Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
6	MARINOVIĆ, Krsto (Krstic)	1926	Croat	male	1	Exhumation & Autopsy Report	P00958, p.6-8	Multiple gunshot wounds, including to the head, most likely from close range, entry at front and exit at back, and also to the left arm, to the lower back, and to the right foot. Cause of death is the crushing of the brain.	[REDACTED]
					2	Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]



Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	MARINOVIĆ, Masa (Manda)	1927	Croat	female	1	Exhumation & Autopsy Report	P00962, p.2-4	Gunshot wounds to the chest, entry from left front side and exit at right back side. Traumatic-haemorrhagic shock was a concurrent cause of death.	[REDACTED]
					2	Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED]
8	MARINOVIĆ, Petar (Patar, Ivan)	1923	Croat	Male	1	Exhumation & Autopsy Report	P00958, p.3-6	Multiple gunshot wounds to back of the chest, lower jaw, and left arm. Cause of death was a haemorrhagic shock.	[REDACTED]
					2	Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
9	MARINović, Roko (Rok)	1931	Croat	Male	1	Exhumation & Autopsy Report	P00961, p.5-8	Gunshot wounds to the chest and to the stomach. Cause of death was haemorrhagic shock	[REDACTED]
					2	Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED]
10	MARINović, Stana	1926	Croat	female	1	Exhumation & Autopsy Report	P00962, p.4-7	Gunshot wounds to the head, entry at right temporal region and also to the left arm, right leg, lumbar region and pelvis. Crushing of the brain was the immediate cause of death, while traumatic-haemorrhagic shock was a concurrent cause of death.	[REDACTED]
					2	Autopsy Identification	P00959	Nine victims were killed on 21 December 1991 in Bruška by Serbian paramilitaries.	[REDACTED]

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
Dalj (Paragraph 36)									
1	ANDAL, Zoran	1967	Hungarian	male	1	Autopsy Report	P00963	Multiple fracture of cranium bones, fracture of the ribs and pelvis probably due to gunshot or explosive wounds. Findings of these injuries indicate a violent death.	[REDACTED]
					2	Death Certificate	P00964	Death was violent and was probably caused by multiple fractures of the cranial vault and base of the skull, and facial bones, fractures of ribs, left ilium and right fibula.	[REDACTED]
					3	DNA Analysis	P00965		[REDACTED]
					4	Missing Person Questionnaire	P00695	Date of Disappearance: 02-03/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
2	BECK (BEK), Pavle (Pavao)	1957	Croat	male	1	Autopsy Report	P00966	Gunshot wounds to the head. There was a possible bullet entrance at the left temporal and a fragment fracture of the facial bones, the mandible, together with extensive disruption of facial skin and soft tissues. These injuries suggest that the possible bullet track was from the left posterior to the right anterior, resulting in the death of this individual. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00696	Date of Disappearance: 12/10/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
3	BRAJIC, Haso	1933	Croat	male	1		Autopsy Report	P00967	Existence of multiple fractures of the arch of the skull, the left pubic bone, the ilium, the left upper arm, and the left ulna. A finding of such fractures indicates a violent cause of death.	[REDACTED]
					2		DNA Analysis	P00968		[REDACTED]
					3		Missing Person Questionnaire	P00697		[REDACTED]
4	FILIPČIĆ, Željko	1966	Croat	male	1		Autopsy Report	P00969	Injuries to the head very probably caused by gunshot or explosive wound. Findings regarding these injuries indicate a violent cause of death.	[REDACTED]
					2		Death Certificate	P00970	Death was violent, probably caused by multiple fractures of base and cranial vault of skull, and left ramus of the mandible.	[REDACTED]
					3		Autopsy Report & DNA Analysis	P00971	Injuries to the head very probably caused by gunshot or explosive wound. Findings regarding these injuries indicate a violent cause of death.	[REDACTED]
					4		Missing Person Questionnaire	P00698	Date of Disappearance: 04/09/1991.	[REDACTED]
										[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
5	FORJAN, Ivan (Ivelić)	1951	Croat	male	1	Autopsy Report	P00972	Existence of fractures on the right side of the jaw, the ribs on both sides, the left radius, and left ulna and right femur. A finding of such injuries indicates a violent cause of death.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Missing Person Questionnaire	P00699	Date of Disappearance: 03/09/1991.	[REDACTED]
6	KUŠIĆ, Darko	1968	Croat	male	1	Autopsy Report	P00974	Injuries to the head very probably caused by gunshot or explosive wound. Fracture of the left side of pelvis. Complex fractures on scalp skeleton point to violent nature of death.	[REDACTED]
					2	Death Certificate	P00975	Death was violent and was most probably the result of several fragmentary fractures of the skull.	[REDACTED]
					3	DNA Analysis	P00976		[REDACTED]
					4	Missing Person Questionnaire	P00700	Date of Disappearance: 22/08/1991.	[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	PREDOJEVIĆ, Čedomir (Čedo)	1954	Croat	Male	1	Autopsy report	P00977	Injuries to the head very probably caused by gunshot or explosive wound. The skull has been fractured several times as well as the facial bones and there is a fracture of the left shoulder blade. The autopsy findings point to a violent cause of death.	[REDACTED]
					2	Death Certificate & DNA Analysis	P00978	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound).	[REDACTED]
					3	Missing Person Questionnaire	P00701	Date of Disappearance: 09/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
8	ŠTIMEC, Dražen	1970	Croat	male	1	Autopsy Report	P00979	Specific round defect on cranial vault and complex fractures on scalp skeleton point to violent nature of death, probably caused by gunshot wound.	[REDACTED]
					2	Death Certificate & DNA Analysis	P00980	Death was violent, most probably caused by a penetrating wound to the head.	[REDACTED]
					3	Missing Person Questionnaire	P00702	Date of Disappearance: 11/09/1991.	[REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
9	ZELEMBER, Ivan	1934	Croat	male	1		Autopsy Report	P00981	Fracture to the right side of the face bone, right upper jaw and also to the left side of the scapula and left arm. The multiple fractures found indicate a violent death.	[REDACTED]
					2		Death Certificate & DNA Analysis	P00982	Cause of death was <i>fractura maxillae et ossis zygomatici</i> .	[REDACTED]
					3		Missing Person Questionnaire	P00703	Date of Disappearance: 25/08/1991.	[REDACTED]
10	ZEMLJAK, Pavo (Pavao)	1934	Croat	male	1		Autopsy Report	P00983	Traumatic findings - skeleton remains' breaks, point to an unnatural cause of death.	[REDACTED]
					2		Report of Death & DNA Analysis	P00984	Death was violent, probably resulting from the consequences of fractures on the skeletal remains.	[REDACTED]
					3		Missing Person Questionnaire	P00704	Date of Disappearance: 26/08/1991.	[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
11	ZEMPLJAK, Vladimir	1967	Croat	male	1	Autopsy Report & DNA Analysis	P00985	Very probably gunshot or explosive wound to the head and also fracture of the right arm, right pelvis and left lower leg. Findings of these fractures point to violent nature of death.	[REDACTED]
					2	Death Certificate	P00986	Death was violent and most probably the result of a multiple fracture of the skull, the right upper arm, the middle public bone, and the left tibia.	[REDACTED]
					3	Missing Person Questionnaire	P00705	Date of Disappearance: 26/08/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]



Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
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**Dalj (Paragraph 37)**

1	BAČA, Erne (Ernest)	1957	Hungarian	male	1	Autopsy Report, DNA Analysis & Death Certificate	P00987	Date of violent death was 4 October 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00706	Date of Disappearance: September 1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
2	BALOG, Josip (Postar)	1945	Hungarian	male	1	Autopsy Report, DNA Analysis & Death Certificate	P00988	Gunshot wound to the chest, entrance from the back and also fracture of the lower jaw as well as bones of the upper part of the face. Cause of death was <i>vulnera sclopetarium thoracis</i> . Date of violent death was 7 October 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00707	Date of Disappearance: 28/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
3	BANKOVIĆ, Martin	un-known	unknown	male					[REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED]
4	GRBEŠIĆ, Mile	1962	Croat	male	1	Autopsy Report, DNA Analysis & Death Certificate	P00989	Gunshot wound to the head, entrance at the lower part of the nose and exist on the back side of the head. Cause of death was <i>vulnera sclopetaria capitis cum leasione cerebri</i> . Date of violent death was 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00708	Date of Disappearance: 22/08/1991.	[REDACTED]  [REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
5	HAĐIĆ, Elvis	1973	Croat	male	1	Autopsy Report, DNA Analysis & Death Certificate	P00990	Gunshot wound to the head, entrance at the back side of the skull and exit at the face. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound to the head). Date of violent death was 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00709	Date of Disappearance: 4/10/1991.	[REDACTED] [REDACTED] [REDACTED]
6	JUKIĆ, Rudolf	1964	Croat	male	1	Autopsy Report & DNA Analysis	P00991	Very probably gunshot or explosive wounds of the head.	[REDACTED]
					2	Report of Death	P00992	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). Date of violent death was 4 November 1991.	[REDACTED]
					3	Missing Person Questionnaire	P00548	Date of Disappearance: 03/09/1991.	[REDACTED] [REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	KRKALO, Ivica	1958	Croat	male	1	Autopsy Report, DNA Analysis & Death Certificate	P00993	Gunshots wound to the head, entrance on the right frontal region. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). Date of violent death was 4 October 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00710	Date of Disappearance: 03/09/1991.	[REDACTED]
8	LUKAČ, Ilesš	1945	Hungarian	male	1	Autopsy Report, DNA Analysis & Death Certificate	P00994	War was the external cause of violent death. Date of violent death was 1991.	[REDACTED]
					2	Missing Person Questionnaire	P00711	Date of Disappearance: 01/10/1991.	[REDACTED]
9	MAKSIMOVIC, Anija (Andrija)	un-known	unknown	un-known					[REDACTED]
									[REDACTED]
									[REDACTED]

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
10	MESARIĆ, Franjo	1953	Croat	male	1	Autopsy Report, DNA Analysis & Death Certificate	P00995	Gunshot wounds to the head, entrance from back. Cause of death was <i>vulnera sclopetarium capitis</i> (gunshot wound). Date of violent death was 1991. War was external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00712	Date of Disappearance: 24/09/1991.	[REDACTED] [REDACTED] [REDACTED]
11	MIKEC, Josip	1954	Croat	male	1	Autopsy Report	P00996	Cause of death was <i>verosimiliter vulnera sclopetaria</i> (probably gunshot wound).	[REDACTED]
					2	Report of Death	P00997	Cause of death was <i>verosimiliter vulnera sclopetaria</i> (probably gunshot wound). Date of violent death was 3 October 1991. War was the external cause of violent death.	[REDACTED]
					3	Missing Person Questionnaire	P00713	Date of Disappearance: 29/09/1991.	[REDACTED] [REDACTED] [REDACTED]
12	MILIĆ, Pero (Petar)	1943	Croat	male	1	Autopsy Report	P00998	Gunshot wound to the head, entrance on the back side of the head.	[REDACTED]
					2	Death Certificate	P00999	Cause of death was <i>vulnera sclopetarium capitis</i> (gunshot wound).	[REDACTED]
					3	Missing Person Questionnaire	P00714	Date of Disappearance: 02/10/1991	[REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
13	MLINAREVIĆ, Zvonko	1958	Croat	male	1		Autopsy Report, DNA Analysis & Death Certificate	P01000	Very probably gunshot or explosive wound to the head. Cause of death was <i>versosimiliter vulnus sclopetarium capitis</i> . Date of violent death was 4 October 1991. War was the external cause of violent death.	[REDACTED]
					2		Missing Person Questionnaire	P00715	Date of Disappearance: 30/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
14	OROZ, Vinko	1967	Croat	male	1		Autopsy Report	P01001	Gunshot wounds to the head, entrance at the left temporal region and exit at the right temporal region. Cause of death was <i>vulnera sclopetaria capitis</i> .	[REDACTED]
					2		Report of Death	P01002	Gunshot wound to the head. Cause of death was <i>vulnera sclopetaria capitis</i> .	[REDACTED]
					3		Report of Death	P01003	Gunshot wound to the head. Cause of death was <i>vulnera sclopetaria capitis</i> . Date of violent death was 1991. War was the external cause of violent death.	[REDACTED]
					4		Autopsy Photographs	P01004		[REDACTED] [REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
								[REDACTED]	[REDACTED]
15	RAŠIĆ, Pero (Petar)	1946	Croat	male	1	Autopsy Report, DNA Analysis & Death Certificate	P01005	Multiple fracture of the skull. Bruises to the back, stomach and right leg and also gunshot wound to the head, entrance at right temporal region and finally, drowning. Cause of death was <i>vulnusa sclopetarium capitis</i> (gunshot wound). Date of violent death was 1 October 1991.	[REDACTED]
					2	Missing Person Questionnaire	P00716	Date of Disappearance: 23/08/1991.	[REDACTED]
16	RADALJEVIĆ, Đorđe	1965	Croat	male	1	Missing Person Questionnaire	P00717	Date of Disappearance: 28 January 1992.	[REDACTED] [REDACTED] [REDACTED]
					1	Autopsy Report	P01006	Gunshot wound to the head. Cause of death was <i>vulnusa sclopetarium capitis</i> .	[REDACTED]
17	RAIĆ, Karlo	1932	Croat	male	2	Report of Death	P01007	Gunshot wound to the head. Cause of death was <i>vulnusa sclopetarium capitis</i> . Date of violent death was 30 September 1991. War was the external cause of violent death.	[REDACTED]
					3	Autopsy Report, DNA Analysis & Death Certificate	P01008	Gunshot wound to the head. Cause of death was <i>vulnusa sclopetarium capitis</i> . Date of violent death was 30 September 1991. War was the external cause of violent death.	[REDACTED]
					4	DNA Analysis	P01009		[REDACTED]

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
					Source#						
18	RASTIJA, Zlatko	1971	Croat	male	1		Autopsy Report, DNA Analysis & Death Certificate	P01010	Gunshot wound to the head. Cause of death was <i>vulnus sclopetarium capitis</i> . Date of violent death was 3 October 1991. War was the external cause of violent death.	[REDACTED]	[REDACTED]
					2		Missing Person Questionnaire	P00718	Date of Disappearance: 28/09/1991.	[REDACTED]	
										[REDACTED] [REDACTED] [REDACTED]	
19	SOLDO, Ranko (Riki)	1947	Croat	male	1		Autopsy Report	P01011	Gunshot wound to the head, entrance at back left side of the skull. The gunshot wound in the occipital region of the head points to a violent, unnatural cause of death, i.e., gunshot to the head.	[REDACTED]	[REDACTED]
					2		Missing Person Questionnaire	P00719	Date of Disappearance: 30/09/1991.	[REDACTED]	
										[REDACTED] [REDACTED] [REDACTED]	
20	STRMEČKI, Stanislav	1970	Croat	male	1		Autopsy Report, DNA Analysis & Death Certificate	P01012	Gunshot wound to the head, entrance at the left back side of the skull. Cause of death was <i>vulnura sclopetaria capitis</i> . Date of violent death was 1992. War was the external cause of violent death.	[REDACTED]	[REDACTED]
					2		Missing Person Questionnaire	P00720	Date of Disappearance: 03/09/1991.	[REDACTED]	
										[REDACTED] [REDACTED] [REDACTED]	



Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
					Source#						
21	ŠARAC, Pavo	1936	Croat	male	1		Autopsy Report	P01013	Very probably gunshot wounds. Cause of death was a fatal brain injury caused by a severe head trauma.	[REDACTED]	
					2		Autopsy Report	P01014	Very probably gunshot wounds. Cause of death was <i>verosimiliter vulnera sclopetaria</i> .	[REDACTED]	
					3		Report of Death	P01015	Cause of death was <i>verosimiliter vulnera sclopetaria</i> . Date of violent death was October 1991. War was the external cause of violent death.	[REDACTED]	
					4		Missing Person Questionnaire	P00721	Date of Disappearance: 01/10/1991.	[REDACTED]	
22	ŠILEŠ, Tibor	1963	Croat	male	1		Decision	P00502	Was killed either 5 or 6 October 1991 and his body was thrown into the Danube.	[REDACTED]	
					2		Missing Person Questionnaire	P00722	Date of Disappearance: 03/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	
23	ŠIMUN, Mihajlo	1937	German	male	1		Missing Person Questionnaire	P00723	Date of Disappearance: 26/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
24	ŠILEŠ, Janoš	1957	Hungarian	male	1	Autopsy Report, DNA Analysis & Death Certificate	P01016	Gunshot wound to the head, entrance at the left back side of the skull and exit through the right eye. Cause of death was <i>vulneta sclopetaria capitis</i> . Date of violent death was 6 December 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00724	Date of Disappearance: 03/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
25	ŠOMOĐVARAC, Marinko (Marin)	1946	Croat	male	1	Autopsy Report, DNA Analysis & Death Certificate	P01017	Gunshot wound to the head, entrance at the back right side of the skull and exit through right side of the nose. Cause of death was <i>vulnus sclopetarium capitis</i> .	[REDACTED]
					2	Missing Person Questionnaire	P00725	Date of Disappearance: 29/09/1991.	[REDACTED] [REDACTED] [REDACTED]
26	TOLAŠ, Mihaj	1954	Hungarian	male	1	Autopsy Report, DNA Analysis & Death Certificate	P01018	Gunshot wound to the head, entrance at the back side of the skull. Cause of death was <i>vulnus sclopetarium capitis</i> .	[REDACTED]
					2	Missing Person Questionnaire	P00726	Date of Disappearance: 01/10/1991.	[REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
27	TOMIČIĆ, Danijel	1929	Croat	male	1	Autopsy Report, DNA Analysis & Death Certificate	P01019	Gunshot wound to the head, entrance at the back left side of the skull and also at the back side of the left shoulder. Cause of death was <i>vulnus sclopetarium capitis</i> . Date of violent death was 1 October 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00727	Date of Disappearance: 15/07/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
					1	DNA Analysis	P01020		[REDACTED]
28	TOMIČIĆ, Ivan	1931	Croat	male	2	Report of Death	P01021	Gunshot wound to the head. Cause of death was <i>vulnus sclopetaria capitis</i> .	[REDACTED]
					3	Missing Person Questionnaire	P00728	Date of Disappearance: 01/09/1991.	[REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
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### Various Locations (Paragraph 38)

1	ASTALOŠ, Ivica	1964	unknown	male	1	Ante-Mortem Data for Missing Person	P00729	Place of Disappearance: Dalj - Planina.	[REDACTED]
2	BENCE, Josip	1925	Hungarian	male	1	Report of Death	P01023	Gunshot wound to the head, entrance on the back and exit on the front side of the head. War was the external cause of violent death. Cause of death was <i>vulnera sclopetaria capitis</i> (gunshot wound). Date of violent death was 9 November 1991.	[REDACTED] [REDACTED]
					2	Autopsy Photographs	P01024	Photographs from the autopsy show remains of a human skull, with a hole on the back side of the skull, typical of an entry gunshot wound.	[REDACTED]
					3	Missing Person Questionnaire	P00730	Date of Disappearance: 09/11/1991.	[REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
3	BEREŠ, Pavao (Pavo, Palko)	1927	Hungarian	male	1	Report of Death	P01025	Gunshot wound to the head. Photos from autopsy show human skull, with a hole on the front temporal, region, typical of an entry gunshot wound. War was the external cause of violent death. Date of violent death was 9 November 1991. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound).	[REDACTED]
					2	Missing Person Questionnaire	P00731	Date of Disappearance: 09/11/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
4	KALOZI, Antun	1929	Hungarian	male	1	Report of Death	P01026	Multiple trauma to the head, consistent with explosive or gunshot wounds. Cause of death was <i>trauma craniocerebrale</i> (severe head injuries). Date of violent death was 9 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00733	Date of Disappearance: 09/11/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
5	KALOZI, Nikola	1952	Hungarian	male	1	Report of Death	P01027	Gunshot wound to the head, entrance on the back and exit at the left temporal region. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00732	Date of Disappearance: 09/11/1991.	[REDACTED]
6	KALOZI, Nikola	1922	Hungarian	male	1	Missing Person Questionnaire	P00734	Date of Disappearance: 09/11/1991.	[REDACTED]
									[REDACTED]
									[REDACTED]
									[REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	MIHALJEV, Ivan (Ivica)	1955	Croat	male	1	Letter	P01029	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound).	[REDACTED]
					2	Autopsy Photographs	P01024	Photo shows human skull with a hole on the right, typical of an entry gunshot wound.	[REDACTED]
					3	Report of Death	P01030	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). War was the external cause of violent death.	[REDACTED] [REDACTED]
8	PALOŠ, Atika	1973	unknown	male	1	Missing Person Questionnaire	P00735	Date of Disappearance: 09/11/1991.	[REDACTED] [REDACTED]
9	PAP, Franjo	1960	Hungarian	male	1	Autopsy Report	P01038	Cause of death was gunshot wounds to the head, with entry on the back side of the skull. Second gunshot wound is in frontal region. Cause of violent death was <i>vulnus sclopetarium capitis</i> (gunshot wound). Date of death was 12 December 1991. War was the external cause of violent death.	[REDACTED]
					2	Letter	P01039		[REDACTED]
					3	Autopsy Report	P01040	Cause of death was gunshot injuries to head.	[REDACTED] [REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
								[REDACTED]	[REDACTED]
10	PAP, Franjo	1934	Hungarian	male	1	Report of Death	P01031	Cause of death was <i>trauma capitis (fractura ossis frontalis et baseos cranii)</i> . Date of violent death was 9 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Report of Death	P01032	Cause of death was <i>trauma capitis (fractura ossis frontalis et baseos cranii)</i> .	[REDACTED]
					3	Missing Person Questionnaire	P00736	Date of Disappearance: 09/11/1991.	[REDACTED]
11	PAP, Julijana	1941	Hungarian	female	1	Autopsy Report	P01041	Cause of death was gunshot injuries to head.	[REDACTED]
					2	Letter	P01042		[REDACTED]
					3	Report of Death	P01043	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). Date of violent death was 12 December 1991. War was the external cause of violent death.	[REDACTED]
					4	Autopsy Report	P01044	Cause of death was gunshot wound to head.	[REDACTED]



Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
12	PAP, Mihaljo	1966	Hungarian	male	1	Report of Death	P01033	Cause of death was <i>trauma capitis</i> . Date of violent death was 9 November 1991. War was the external cause of violent death.	[REDACTED]
					2	Missing Person Questionnaire	P00737	Date of Disappearance: 10/09/1991.	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
13	RAKIN, Natalija	1971	Croat	female	1	Report of Death	P01045	Cause of death was gunshot wound to the head. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). Date of violent death was 12 December 1991. War was the external cause of violent death.	[REDACTED]
					2	Letter	P01046		[REDACTED]
					3	Missing Person Questionnaire	P00739	Date of Disappearance: 12/12/1991.	[REDACTED]

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
14	SENAŠI, Josip	1967	Hungarian	male	1	Report of Death	P01034	Cause of death was <i>vulnera sclopetaria capitis verosimiliter</i> (gunshot wound). War was the external cause of violent death.	[REDACTED]
					2	Ante-Mortem Data for Missing Person	P01035		[REDACTED]
					3	Missing Person Questionnaire	P00738	Date of Disappearance: 09/11/1991.	[REDACTED]
					4	[REDACTED]	[REDACTED]	Date of Disappearance: 09/11/1991.	[REDACTED]
15	SENAŠI, Marija	1937	Hungarian	female	1	Report of Death	P01047	Date of violent death was 3 June 1992. War was the external cause of violent death.	[REDACTED]
					2	Letter	P01048		[REDACTED]
					3	Missing Person Questionnaire	P00740	Date of Disappearance: 03/06/1992.	[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
16	SENAŠI, Stjepan	1935	Hungarian	male	1	Report of Death	P01036	War was external cause of violent death.	[REDACTED]
					2	Ante-Mortem Data for Missing Person	P01037		[REDACTED]
					3	[REDACTED]	[REDACTED]	Date of Disappearance: 09/11/1991.	[REDACTED]
									[REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
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Erdut (Paragraph 39)

1	BARBARIĆ, Jakov (Jakob)	1931	Croat	male	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Report of Death	P01050	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). War was the external cause of violent death.	[REDACTED]
					3	Identification Report	P01051	Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound).	[REDACTED]
					4	Missing Person Questionnaire	P00741	Date of Disappearance: 11/11/1991.	[REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
					Source#						
2	CURIĆ, Tomo	1937	Croat	male	1		Autopsy Report	P01052	Gunshot wound to the head, exit at the back side. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound).	[REDACTED]	
					2		Exhumation Photographs from Erdut	P01053, p.2		[REDACTED]	
					3		Missing Person Questionnaire	P00742	Date of Disappearance: 05/09/1991.	[REDACTED]	
					4		Set of documents containing: 1) Non-ICTY Witness Statement, 2) Identification of dead bodies, 3) Personal Health Record	P01054		[REDACTED]	
3	DEBIĆ, Josip (Deba, Ivan, Ivica)	1946	Croat	male	1		Report of Death	P01055	War was the external cause of violent death.	[REDACTED]	
					2		Questionnaire on Missing Persons of the United Nation Office at Geneva, including list of identified dead bodies	P01056		[REDACTED]	
					3		Missing Person Questionnaire	P00743	Date of Disappearance: 11/11/1991.	[REDACTED]	
										[REDACTED]	

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
4	KUČAN, Ivan (Ivica)	1947	Croat	male	1	Report of Death	P01057	Gunshot wounds to the head, two entry-exit wounds of the top of the head, left side. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). War was the external cause of violent death.	[REDACTED]
					2	Exhumation Photographs from Erdut	P01053, p.3		[REDACTED]
					3	Set of documents containing: 1) Non-ICTY Witness Statement, 2) Identification of dead bodies, 3) Personal Health Record	P01058		[REDACTED]
					4	Missing Person Questionnaire	P00744	Date of Disappearance: 11/11/1991.	[REDACTED] [REDACTED] [REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
5	VANIČEK, Josip	1951	Croat	male	1	Report of Death	P01059	Gunshot wounds to the head. Cause of death was <i>vulnus sclopetarium capitis</i> (gunshot wound). War was the external cause of violent death.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Missing Person Questionnaire	P00745	Date of Disappearance: 11/11/1991.	[REDACTED]
									[REDACTED]

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
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**Erdut (Paragraph 42)**

1	M/AJ, Manda	1933	Croat	female	1	Autopsy Report & Death Certificate	P01060	Gunshot wound to the head, entrance at the right back side and exit at the frontal left side of the head. War was the external cause of violent death.	[REDACTED]
					2	Letter	P01061		[REDACTED]
					3	Exhumation Photographs from Erdut	P01062		
					4	Missing Person Questionnaire	P00746	Date of Disappearance: 25/12/1991.	
					5	Exhumation Photographs from Erdut	P01053, p.19-20		
					6	Newspaper article in BCS, "We are again under the Croatian flag!"	P01073		
2	MATIN, Andrija	1905	Croat	male	1	Autopsy Report & Death Certificate	P01063	Gunshot injury to the neck. There was a small hole in the back of the neck through the shirt collar, with a track through the cervical spine, consistent with a gunshot injury. This would have caused immediate incapacitation and would have caused his death. War was the external cause of violent death.	[REDACTED]
					2	Letter	P01064		[REDACTED]
					3	Missing Person Questionnaire	P00747	Date of Disappearance: August 1991.	[REDACTED]
					4	Newspaper article in BCS, "We are again under the Croatian flag!"	P01073		



Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
								[REDACTED]	[REDACTED]
3	MATOŠEVIĆ, Nikola	1948	Croat	male	1	Autopsy Report, Death Certificate, & DNA Report	P01065	Blunt force trauma at the area of the right ear, with ring fracture of the skull and wound (probably gunshot) at the right side of the neck and shrapnel wounds at the back of the chest and both legs. This was a violent death.	[REDACTED]
					2	Death Certificate	P01066	Cause of death was <i>trauma capitis</i> . War was the external cause of violent death.	[REDACTED]
					3	Letter	P01067		
					4	Identification Report	P01068		
					5	Missing Person Questionnaire	P00748	Date of Disappearance: 24/12/1991.	
4	PITTL, Franjo	1933	Croat	male	1	Autopsy Report	P01069	Gunshot wound to the head, from the back side to the front and also explosive wounds from shrapnel, at the area of neck, right side of the back and extremity.	[REDACTED]
					2	Letter	P01070		[REDACTED]
					3	Exhumation Photographs from Erdut	P01053, p.18		[REDACTED]
					4	Missing Person Questionnaire	P00749	Date of Disappearance: 24/12/1991.	
					5	Newspaper article in BCS, "We are again under the Croatian flag!"	P01073		

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
5	ŠIMEK, Andrija	1931		male	1	Autopsy Report	P01071	Gunshot wound to the head, entrance from the back at close range, exit on the top of the head and also severe blast injuries on the back side.	[REDACTED]
					2	Letter	P01072		[REDACTED]
					3	Missing Person Questionnaire & Newspaper article titled "Arkan is Moping" Erdut "	P00750	Date of Disappearance: 24/12/1991.	
					4	Newspaper article in BCS, "We are again under the Croatian flag!"	P01073		
6	TEŠANAC, Stjepan (Stevo)	1932		male	1	Autopsy Report	P01074	Gunshot wound to the neck, entrance on the back side and also shrapnel wounds on the back side.	[REDACTED]
					2	Letter	P01075		[REDACTED]
					3	Missing Person Questionnaire	P00751	Date of Disappearance: 24/12/1991.	[REDACTED]
					4	Newspaper article in BCS, "We are again under the Croatian flag!"	P01073		

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	ZORETIĆ, Josip (Jure)	1951	Croat	male	1	Letter	P01076	[REDACTED]	[REDACTED]
					2	Report of Death	P01077	Cause of death was <i>vulnus sclopetarium capitis</i> . Cause of death was unnatural. War was the external cause of violent death.	
					3	Identification Report	P01078	[REDACTED]	
					4	Autopsy Report	P01079	Gunshot wound to the head.	
					5	Missing Person Questionnaire	P00752	Date of Disappearance: 25/12/1991.	
					6	Exhumation Photographs from Erdut	P01053, p.17	[REDACTED]	

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
<b>Bosanski Šamac (Paragraph 50)</b>									
1	AGATIĆ, Ivan	1965	non-Serb	male	1	Identification & Handover Protocol	P02181	[REDACTED]	[REDACTED]
					2	Post-mortem Examination Report	P02197	Fractures of the skull and the cervical vertebrae indicate an unnatural and violent death.	[REDACTED]
2	ANTUNOVIĆ, Jozo	1960	non-Serb	male	1	Identification & Handover Protocol	P02182	[REDACTED]	[REDACTED]
					2	Post-mortem Examination Report	P02198	The fracture and defect of the left humerus indicate an unnatural and violent death, most probably as a consequence of an action of a projectile fired from a firearm.	[REDACTED]
3	BALIĆ, Džemal	1953	non-Serb	male	1	Identification & Handover Protocol	P02183	[REDACTED]	[REDACTED]
					2	Post-mortem Examination Report	P02199	The fractures of the right humerus, sternum, clavicae, left humerus and tibia indicated unnatural and violent death, most probably as a consequence of the passage of a projectile fired from a firearm.	[REDACTED]
4	BLAŽANOVIĆ, Luka (Kiwi)	1956	non-Serb	male	1	Identification & Handover Protocol	P02184	[REDACTED]	[REDACTED]
					2	Post-mortem Examination Report	P02200	Head-bone fractures indicate an unnatural and violent nature of death, most probably the consequence of a perforation by a projectile fired from a firearm.	[REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
					Source#						
5	BRANDIĆ, Niko	1959	non-Serb	male	1		Identification & Handover Protocol	P02185		[REDACTED]	[REDACTED]
					2		Post-mortem Examination Report	P02201		[REDACTED]	
6	ČORKOVIĆ, Miro	1967	non-Serb	male	1		Identification & Handover Protocol	P02186		[REDACTED]	[REDACTED]
					2		Post-mortem Examination Report	P02202	The skull-bone fractures indicate an unnatural and violent death, most probably as a consequence of the passage of the projectiles fired from a firearm.	[REDACTED]	
7	GREGUREVIĆ, Luka	1955	non-Serb	male	1		Identification & Handover Protocol	P02187		[REDACTED]	[REDACTED]
					2		Post-mortem Examination Report	P02203	The skull-bone fractures indicate an unnatural and violent death, most probably as a consequence of the passage of the projectiles fired from a firearm.	[REDACTED]	
					3		DNA Analysis	P02195			
8	HRNIĆ, Husein	1960	non-Serb	male	1		Identification & Handover Protocol	P02188		[REDACTED]	[REDACTED]
					2		Post-mortem Examination Report	P02204		[REDACTED]	
9	HURTIĆ, Sead	1963	non-Serb	male	1		Identification & Handover Protocol	P02189		[REDACTED]	[REDACTED]
					2		Post-mortem Examination Report	P02205	The skull-bone fractures indicate an unnatural and violent death, most probably as a consequence of the passage of the projectiles fired from a handgun.	[REDACTED]	
10	KAHRIMANOVIĆ, Izet	1967	non-Serb	male	1		Identification & Handover Protocol	P02190		[REDACTED]	[REDACTED]
					2		Post-mortem Examination Report	P02206	The skull-bone fractures indicate an unnatural and violent death.	[REDACTED]	

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
									[REDACTED]
11	MANDIĆ, Franjo	1946		male	1	Identification & Handover Protocol	P02191		[REDACTED]
					2	Post-mortem Examination Report	P02207		[REDACTED]
12	MATIĆ, Ilija	1947	non-Serb	male	1	Identification & Handover Protocol	P02192		[REDACTED]
					2	Post-mortem Examination Report	P02208	Head-bone fractures indicate an unnatural and violent nature of death.	[REDACTED]
13	NADŽAK, Nežir	1967	non-Serb	male	1	Identification & Handover Protocol	P02193		[REDACTED]
					2	Post-mortem Examination Report	P02209	Head-bone fractures indicate an unnatural and violent nature of death, most probably caused by a projectile fired from a handgun.	[REDACTED]
14	ORŠOLIĆ, Josip	1948	non-Serb	male	1	Identification & Handover Protocol	P02194		[REDACTED]
					2	Post-mortem Examination Report	P02210	Head-bone fractures indicate an unnatural and violent nature of death, most probably the consequence of a perforation from a projectile fired from a handgun.	[REDACTED]
15	PURAK, Selim	1957	non-Serb	male	1	Identification & Handover Protocol	P02195		[REDACTED]
					2	Post-mortem Examination Report	P02211	Head-bone fractures indicate an unnatural and violent nature of death, but it is impossible to determine the precise mechanism of death (possibly a projectile fired from a handgun).	[REDACTED]
16	TUZLAK, Ivo	1951	non-Serb	male	1	Identification & Handover Protocol	P02196		[REDACTED]
					2	Post-mortem Examination Report	P02212		[REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
<b>Doboij (Paragraph 54)</b>									
1	AHMIĆ, Ešef (Ešref)	1948	non-Serb	male	1	Autopsy Report	P02147	Cause of death was perforating wounds to the thoracic cage. Nature of death is homicide.	[REDACTED]
					2	Identification Report	P02146		[REDACTED]
					3	Letter	P02140		[REDACTED]
					4	Exhumation Report	P02142	Was killed with many other people from the same village in the human shield incident on 12 July 1992.	[REDACTED]
2	AHMIĆ, Hasan	1948	non-Serb	male	1	Autopsy Report	P02149	Cause of death was multiple (probably explosive) trauma to the right arm and leg, left shoulder girdle and lowe left rib.	[REDACTED]
					2	Identification Report	P02258		[REDACTED]
					3	Autopsy Report	P02254	Cause of death was multiple (probably explosive) trauma to the right arm and leg, left shoulder girdle and lowe left rib.	[REDACTED]
					4	Letter	P02140		[REDACTED]
					5	Identification Report	P02148		
					6	Exhumation Report	P02143, p.6		[REDACTED]
3	AHMIĆ, Senad	1974	non-Serb	male	1	Death Certificate	P02172		[REDACTED] [REDACTED] [REDACTED] [REDACTED]

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
4	AHMIĆ, Zijad	1947	non-Serb	male	1		Autopsy Report	P02151	Evidence of injuries is a double penetrating fracture of the left femur.	[REDACTED]
					2		Letter	P02140		[REDACTED]
					3		Exhumation Report	P02143, p.6		[REDACTED]
					4		Identification Report	P02150		[REDACTED]
5	DELIĆ, Omer	1958	non-Serb	male	1		Letter	P02140		[REDACTED]
					2		Exhumation Report	P02143, p.4		[REDACTED]
6	HADŽIKADUNIĆ, Nurudin	1958	non-Serb	male	1		Autopsy Report	P02144, p.11-12	Evidence of injuries is a fracture of the posterior part of one lower left rib.	[REDACTED]
					2		Letter	P02140		[REDACTED]
					3		Exhumation Report	P02145, p.3		[REDACTED]
7	HAMIDović, Ramiz	1941	non-Serb	male	1		Autopsy Report	P02153	Evidence of injuries is a shattering of the sacrum and fragmentation of the anterior parts of both pubic bones and diagonal fractures of the right humerus with missing fragments on the inner side.	[REDACTED]
					2		Identification Report	P02152		[REDACTED]
					3		Exhumation Report	P02143, p.5-6		[REDACTED]
					4		Letter	P02140		[REDACTED]



Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
					Source#						
8	HAMIDOVIĆ, Safet	1970	non-Serb	male	1		Death Certificate	P02173		[REDACTED]	[REDACTED]
9	HUSANOVIĆ, Muhamed	1972	non-Serb	male	1		Autopsy Report	P02171	Evidence of injuries is a multiple shattering of the proximal end of the right femur and multiple shattering of the distal end of the left femur and proximal ends of the left tibia and fibula.	[REDACTED]	[REDACTED]
					2		Exhumation Report	P02143, p.5		[REDACTED]	[REDACTED]
					3		Letter	P02140		[REDACTED]	[REDACTED]
					4		Identification Report	P02170		[REDACTED]	[REDACTED]
10	KADIĆ, Hasib	1946	non-Serb	male	1		Autopsy Report	P02155	Cause of death was multiple (probably explosive) trauma to the pelvis, left femur and right arm.	[REDACTED]	[REDACTED]
					2		Letter	P02140		[REDACTED]	[REDACTED]
					3		Identification Report	P02154		[REDACTED]	[REDACTED]
					4		Exhumation Report	P02143, p.5		[REDACTED]	[REDACTED]
11	KALEM, Ante (Anto)	1961	non-Serb	male	1		Identification Report	P02156		[REDACTED]	[REDACTED]
					2		Exhumation Report	P02143, p.4		[REDACTED]	[REDACTED]
					3		Letter	P02140		[REDACTED]	[REDACTED]
					4		Exhumation Report	P02141, p.5	Was killed on the road near the school.	[REDACTED]	[REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
12	MAKAREVIĆ, Jasmin	un-known	non-Serb	male	1	Exhumation Report	P02141, p.4		[REDACTED]
					2	Exhumation Report	P02143, p.3		[REDACTED]
					3	Letter	P02140		[REDACTED]
13	MAKAREVIĆ, Nedžad	1968	non-Serb	male	1	Exhumation Report	P02143, p.3		[REDACTED]
					2	Letter	P02140		[REDACTED]
					3	Exhumation Report	P02141		[REDACTED]
14	MAKAREVIĆ, Salih	1960	non-Serb	male	1	Exhumation Report	P02143, p.4		[REDACTED]
					2	Letter	P02140		[REDACTED]
15	MUJANOVIĆ, Halid	1948	non-Serb	male	1	Autopsy Report	P02158	Evidence of injuries is a multiple shattering of the the skull bones and a shattered head.	[REDACTED]
					2	Autopsy Report	P02144, p.12-13	Evidence of injuries is a multiple shattering of the the skull bones and a shattered head.	[REDACTED]
					3	Letter	P02140		[REDACTED]
					4	Identification Report	P02157		[REDACTED]
					5	Exhumation Report	P02141, p.8	There are indications that he was killed while being used as human shield on 12 July 1992.	
16	MUJANOVIĆ, Meho	1954	non-Serb	male	1	Autopsy Report	P02160		[REDACTED]
					2	Letter	P02140		[REDACTED]
					3	Identification Report	P02159		[REDACTED]
					4	Exhumation Report	P02143, p.3		

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
17	OMERČIĆ, Arif	1963	non-Serb	male	1	Autopsy Report	P02162	Cause of death was explosive trauma to the cranial part of the head (probably).	[REDACTED]
					2	Letter	P02140		[REDACTED]
					3	Exhumation Report	P02143, p.5		[REDACTED]
					4	Identification Report	P02161		[REDACTED]
18	OMERČIĆ, Hasib	1967	non-Serb	male	1	Autopsy Report	P02144, p.13-14	Evidence of injuries is a multi-fragmentary fracture of the bones in the left lower leg.	[REDACTED]
					2	Exhumation Report	P02141, p.3-4	There are indications that he was killed on 12 July 1992.	[REDACTED]
					3	Identification Report	P02163		[REDACTED]
					4	Autopsy Report	P02164		[REDACTED]

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
19	OMERČIĆ, Mehmed	1957	non-Serb	male	1	Autopsy Report	P02166	Evidence of injuries are a double fracture of the right tibia with a missing fragment of the posterior inner proximal, a diagonal fracture with a missing part of the body of the right fibula and two round-shaped trauma as to the external plate of the middle and right part of the frontal bone and several to the anterior of the middle part of the right humerus.	[REDACTED]
					2	Identification Report	P02165		[REDACTED]
					3	Letter	P02140		[REDACTED]
					4	Identification Report	P02259		[REDACTED]
					5	Autopsy Report	P02255	Evidence of injuries are double fracture of the right tibia with a missing fragment of the posterior inner proximal, a diagonal fracture with a missing part of the body of the right fibula and two round-shaped trauma as to the external plate of the middle and right part of the frontal bone and several to the anterior of the middle part of the right humerus.	
20	SEHIĆ, Beđir	1953	non-Serb	male	6	Exhumation Report	P02143, p.4		[REDACTED]
					1	Autopsy Report	P02168	Cause of death was an entry-exit wounds of the left side of the thoracic cage.	[REDACTED]
					2	Letter	P02140		[REDACTED]
					3	Exhumation Report	P02143, p.4		[REDACTED]
21	ZEČEVIĆ, Muhamed	1943	non-Serb	male	4	Identification Report	P02167		[REDACTED]
					1	Identification Report	P02169		[REDACTED]
					2	Letter	P02140		[REDACTED]
					3	Exhumation Report	P02143, p.6		[REDACTED]

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
<b>Trnova, Sanski Most (Paragraph 56)</b>									
1	BEHREMOVIĆ, Abdulah	1946	non-Serb	male	1	Identification Report	P02177	[REDACTED]	[REDACTED]
					2	Autopsy Report	P02179	Death was the consequence of a head injury and injury to the abdomen and internal abdominal organs and a fracture of the upper third of the upper left arm. These injuries were caused by the discharge of a firearm.	[REDACTED]
					3	Investigation Notes	P02174		
					4	Identification Report	P02178		
2	MURATOVIĆ, Osman	1939	non-Serb	male	1	Exhumation / Identification Report	P02076	[REDACTED]	[REDACTED]
					2	Investigation Notes	P02174	[REDACTED]	[REDACTED]
3	OMERSPAHIĆ, Idriz	1955	non-Serb	male	1	Exhumation / Identification Report	P02076	[REDACTED]	[REDACTED]
					2	Investigation Notes	P02174	[REDACTED]	[REDACTED]
4	SABIĆ, Midhad	1955	non-Serb	male	1	Exhumation / Identification Report	P02076	[REDACTED]	[REDACTED]
					2	Investigation Notes	P02174	[REDACTED]	[REDACTED]
5	SEHIĆ, Derviš	1949	non-Serb	male	1	Exhumation / Identification Report	P02076	[REDACTED]	[REDACTED]
					2	Investigation Notes	P02174	[REDACTED]	[REDACTED]
6	SEHIĆ, Mehmed	1947	non-Serb	male	1	Exhumation / Identification Report	P02076	[REDACTED]	[REDACTED]
					2	Investigation Notes	P02174	[REDACTED]	[REDACTED]

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
7	SEHIĆ, Safet	1950	non-Serb	male	1	Exhumation / Identification Report	P02076		[REDACTED]
					2	Investigation Notes	P02174		[REDACTED]
8	SMAILAGIĆ, Mesud	1945	non-Serb	male	1	Exhumation / Identification Report	P02076		[REDACTED]
					2	Investigation Notes	P02174		[REDACTED]
9	TAHUNDŽIĆ, Mehmed	1951	non-Serb	male	1	Exhumation / Identification Report	P02076		[REDACTED]
					2	Investigation Notes	P02174		[REDACTED]
10	TOPALLOVIĆ, Nijaz	1948	non-Serb	male	1	Exhumation / Identification Report	P02176		[REDACTED]
					2	Investigation Notes	P02174		[REDACTED]
					3	Identification Report	P02175		[REDACTED]
					4	Autopsy Report	P02180	Death was violent, and the consequence of the discharge of a firearm, with damage to a major blood vessel and haemorrhage.	[REDACTED]
11	TOPIĆ, Hasan	1941	non-Serb	male	1	Investigation Notes	P02174		[REDACTED]
					2	Exhumation / Identification Report	P02076		[REDACTED]

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
<b>Sasina, Sanski Most (Paragraph 57)</b>									
1	AGANOVIĆ, Senad	1954	non-Serb	male	1	Decision	P02083	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2	Autopsy Report	P02080, p.31-32	Death was violent. Cause of death was injury to head. Head injury with multiple fractures of the facial bones and skull was caused by a discharged firearm.	[REDACTED]
					3	Exhumation Report	P02079, p.28	Death was violent as a result of the fractures inflicted to the head with a firearm.	
					4	[REDACTED]	[REDACTED]		
2	ALAGIĆ, Fevzija	1932	non-Serb	male	1	Exhumation Report	P02079, p.9-10	Died as a result of the injuries inflicted to his head with a firearm.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Decision	P02084	Was killed on 20/21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
3	ALAGIĆ (RESIĆ), Munivera	1953	non-Serb	female	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Exhumation Report	P02079, p.8	The cause of death was the injury inflicted with a firearm to the cervical vertebrae and spinal cord.	[REDACTED]
					3	Decision	P02137	Was killed on 20-21 September 1995 in Sasina.	
					4	Autopsy Report	P02080, p.95-96	Death was violent. Cause of death was injuries to head and cervical spine. Injury to head and cervical spine were caused by a discharged firearm.	
					5	Decision	P02136	Was killed on 20-21 September 1995 in Sasina, Sanski Most.	

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
4	ALAGIĆ, Remzija	1932	non-Serb	male	1		Decision	P02085	Was killed on 20/21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2		Death Certificate	P02086		[REDACTED]
					3		Autopsy Report	P02080, p.21-22	Death was violent. Cause of death was injury to head bones. Injuries caused by discharged firearm.	
					4		[REDACTED]	[REDACTED]		
					5		Exhumation Report	P02079, p.4-5	Died a violent death. The injuries were inflicted with a firearm at point-blank range - the gun barrel was placed against his head.	
5	ALIBABIĆ, Kadir	1936	non-Serb	male	1		[REDACTED]	[REDACTED]		[REDACTED]
					2		Autopsy Report	P02080, p.35-36	Death was violent. Cause of death was injury to head. Head injury was caused by a discharged firearm.	[REDACTED]
					3		Exhumation Report	P02079, p.15-16	Died a violent death as result of the injuries inflicted to his head with a firearm at point-blank range.	
6	ARAPOVIĆ, Osman	1939	non-Serb	male	1		Decision	P02087	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2		Exhumation Report	P02079, p.11-12	Died a violent death as a result of the injuries inflicted to the head with a firearm.	[REDACTED]
					3		Autopsy Report	P02080, p.97-98	Death was violent. Cause of death was injury to head. Injury to head was caused by a discharged firearm.	[REDACTED]
					4		[REDACTED]	[REDACTED]		



Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
7	BAJRIĆ, Mehmedalija	1959	non-Serb	male	1		[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2		Exhumation Report	P02079, p.32		Died a violent death as a result of the injury inflicted to the cervical vertebrae. Injuries were inflicted to the 2nd and 3rd cervical vertebra with a firearm.	[REDACTED]	
					3		Autopsy Report	P02080, p.127		Death was violent. Cause of death was injury to cervical spine. Injuries to the second and third cervical vertebra were caused by a firearm.		
8	BAJRIĆ, Senad	1976	non-Serb	male	1		Autopsy Report	P02080, p.107-108		Death was violent. Cause of death was injury to eighth thoracic vertebra and to thoracic organs. Described wound on the back is the entry wound caused by a discharged firearm. Direction of the shot was from above to below from the back to front.	[REDACTED]	[REDACTED]
					2		[REDACTED]	[REDACTED]			[REDACTED]	
					3		Exhumation Report	P02079, p.10		Died a violent death after sustaining injuries to the ribcage organs caused by two bullets from a firearm.		
9	BAJROVIĆ (HAJROVIĆ), Meho	1947	non-Serb	male	1		Autopsy Report	P02080, p.88-89		Death was violent. Cause of death was injury to the head. Multiple fractures of the upper and lower jaws and of the facial bones were caused by a discharged firearm.	[REDACTED]	[REDACTED]
					2		Exhumation Report	P02079, p.36-37		Died a violent death as a result of the fractures inflicted to his head. Multiple fractures of his upper and lower jaws, as well as of his facial bone, inflicted with a firearm.	[REDACTED]	
					3		[REDACTED]	[REDACTED]				

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
10	BEHAR, Hajrudin	1968	non-Serb	male	1		Autopsy Report	P02080, p.113-114	Death was violent. Cause of death was destruction of head. Head destruction was caused by a firearm discharged at point blank range.	[REDACTED]
					2		[REDACTED]	[REDACTED]		[REDACTED]
					3		Exhumation Report	P02079, p.29-30	Died a violent death as a result of the fractures inflicted to his head with a firearm at point-blank range.	
11	BEHREMOVIĆ, Elvir	1971	non-Serb	male	1		Exhumation Report	P02079, p.8-9	Died a violent death immediately resulting from injuries inflicted to the head with a firearm.	[REDACTED]
					2		[REDACTED]	[REDACTED]		[REDACTED]
					3		Autopsy Report	P02080, p.99-100	Death was violent. Cause of death was injury to head and thorax. Injuries were caused by a discharged firearm.	
					4		Decision	P02088	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
12	BEHREMOVIĆ, Ibrahim	1934	non-Serb	male	1		[REDACTED]	[REDACTED]		[REDACTED]
					2		Exhumation Report	P02079, p.7-8	Died a violent death. There is an entry wound on the left side of the ribcage which runs along the fifth laterla rib and an exit wound runs the frontal fifth and sixth ribs.	[REDACTED]
					3		Decision	P02089	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					4		Autopsy Report	P02080, p.92-93	Death was violent. Cause of death was injury to thoracic organs. Injury to the thoracic organs was caused by a discharged firearm.	

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
13	BESIĆ, Jahija	1928	non-Serb	male	1	Decision	P02117	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2	Birth Certificate	P02119	[REDACTED]	
					3	Autopsy Report	P02080, p.68-69		
					4	Exhumation Report	P02079, p.18-19		
					5	[REDACTED]	[REDACTED]		
					6	Decision	P02118		
14	BOTONJIĆ, Muharem	1922	non-Serb	male	1	Autopsy Report	P02080, p.103-104	Death was violent. Cause of death was injury to head. Injury to head was caused by a discharged firearm.	[REDACTED]
					2	[REDACTED]	[REDACTED]	[REDACTED]	
					3	Exhumation Report	P02079, p.17		

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
15	BUHA, Drago	1972	non-Serb	male	1	Autopsy Report	P02080, p.125-126	Cause of death was injury to head. Multiple fractures of the head bones were caused by a firearm discharged at point blank range.	[REDACTED]	[REDACTED]
					2	Exhumation Report	P02079, p.32-33	The injuries were inflicted with a firearm and he died immediately as a result of the injuries inflicted to his head.	[REDACTED]	
					3	[REDACTED]	[REDACTED]			
					4	Decision	P02113	Died on 20-21 September 1995 in Sasina.		
16	BUHA, Stjepan	1966	non-Serb	male	1	Decision	P02090	Died on 19 September 1995 in Sasina.	[REDACTED]	
17	CAVLOVIĆ, Franjo	1964	non-Serb	male	1	Decision	P02092	Died on 19 September 1995 in Sasina.	[REDACTED]	
18	CEKIĆ, Irfan	1928	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Exhumation Report	P02079, p.12	Died a violent death as a result of the injuries inflicted to the head with a firearm.	[REDACTED]	
					3	Autopsy Report	P02080, p.15-16	Death was violent. Cause of death was injury to the head. Head injury with bone fractures was caused by a discharged firearm.	[REDACTED]	
					4	Decision	P02116	Died on 20-21 September 1995 in Sasina.		
19	CERIC, Derviš	1934	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Autopsy Report	P02080, p.117-118	Death was violent. Cause of death was injury to head caused by a discharged firearm. Multiple fractures of the head bones were caused by a firearm discharged at a point blank range.	[REDACTED]	
					3	Exhumation Report	P02079, p.30	Died a violent death as a result of the injuries inflicted to his head with a firearm. Multiple fractures were inflicted to his head with a firearm at point-blank range.	[REDACTED]	

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
20	CERIĆ, Eniz	1939	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Decision	P02091	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]	
					3	Autopsy Report	P02080, p.59-60	Death was violent. Cause of death was injury to thorax. The described shot through the thorax was caused by projectile discharged from a firearm with the direction from right to left, above to below and back to front.		
					4	Exhumation Report	P02079, p.20	Died a violent death immediately resulting from injuries inflicted to his ribcage with a firearm.		
21	DAUTOVIĆ, Aziz	1957	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Decision	P02120	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]	
					3	Exhumation Report	P02079, p.5	Injuries to the head were inflicted by firearms which caused death.		
					4	Autopsy Report	P02080, p.25-26	Death was violent. Cause of death was injury to head. Injury to head was caused by a firearm discharged at point blank range.		
					5	Birth Certificate	P02121			
22	DROBIĆ, Ermin	1976	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Exhumation Report	P02079, p.26	Died a violent death as a result of the injuries inflicted with a firearm.	[REDACTED]	
					3	Autopsy Report	P02080, p.41-42	Death was violent. Cause of death was injury to cervical spine. Injury was cause by a discharged firearm.		
					4	Decision	P02128	Was killed as a civilian in Sasina, Sanski Most, on 20 September 1995.		
					5	Decision	P02129	Was killed as a civilian in Sasina, Sanski Most, on 20 September 1995.		

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
23	DROBIĆ, Ibrahim	1978	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Exhumation Report	P02079, p.27	Died a violent death immediately resulting from injuries inflicted to his ribcage with a firearm.	[REDACTED]	
					3	Autopsy Report	P02080, p.72-73	Death was violent. Cause of death was injury to head. Head injury was caused by a discharged firearm.		
					4	Decision	P02131	Was killed as a civilian in Sasina, Sanski Most municipality, on 20 September 1995.		
					5	Decision	P02130	Was killed as a civilian in Sasina, Sanski Most municipality, on 20 September 1995.		
24	DROBIĆ, Muharem	1941	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Decision	P02132	Was killed as a civilian in Sasina, Sanski Most municipality, on 20 September 1995.	[REDACTED]	
					3	Exhumation Report	P02079, p.25-26	Died a violent death as a result of the injuries inflicted with a firearm.		
					4	Decision	P02133	Was killed as a civilian in Sasina, Sanski Most municipality, on 20 September 1995.		
					5	Autopsy Report	P02080, p.61-62	Death was violent. Cause of death was injury to head. Head injury caused by a discharged firearm.		
25	DŽAFIĆ, Ekrem	1932	non-Serb	male	1	Autopsy Report	P02080, p.109-110	Death was violent. Cause of death was injury to head. Head injury was caused by a discharged firearm at point blank range.	[REDACTED]	[REDACTED]
					2	Exhumation Report	P02079, p.13	Died a violent death as a result of the injuries inflicted to the head when he was shot with a firearm at point-blank range.	[REDACTED]	
					3	[REDACTED]	[REDACTED]			
					4	Decision	P02093	Was killed as a civilian on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.		

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
26	DŽENANOVIĆ, Sefk	1932	non-Serb	male	1		Autopsy Report	P02080, p.13-14	Death was violent. Cause of death was injury to head. Head injury was caused by a discharged firearm.	[REDACTED]
					2		Exhumation Report	P02079, p.25	Died a violent death as a result of the injuries inflicted with a firearm.	[REDACTED]
					3		Decision	P02094	Was killed as a civilian on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					4		[REDACTED]	[REDACTED]		
27	DŽINIĆ, Enes	1954	non-Serb	male	1		Birth Certificate	P02096		[REDACTED]
					2		[REDACTED]	[REDACTED]		[REDACTED]
					3		Exhumation Report	P02079, p.11	Died as a result of the injuries inflicted to the head with a firearm.	[REDACTED]
					4		Decision	P02095	Was killed as a civilian on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
28	HAJRIĆ, Ernes	1977	non-Serb	male	5		Autopsy Report	P02080, p.9-10	Death was violent. Cause of death was injury to head by a firearm discharged at point blank range.	
					1		Autopsy Report	P02080, p.29-30	Death was violent. Cause of death was injury to head. Multiple head bones fractures were caused by a firearm discharged at point blank range.	[REDACTED]
					2		Exhumation Report	P02079, p.15	Died as a result of the injuries inflicted to the head with a firearm.	[REDACTED]
					3		[REDACTED]	[REDACTED]		

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
29	HALIMOVIC, Avdo	1930	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Autopsy Report	P02080, p.57-58	Death was violent. Cause of death was injury to cervical spine. Injury was cause by a discharged firearm.	[REDACTED]
					3	Exhumation Report	P02079, p.23	Cause of death was injuries inflicted with a firearm at point-blank range.	
30	HASANOVIC, Mehmed	1945	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Autopsy Report	P02082	Death caused by a firearm injury to the head.	[REDACTED]
					3	Exhumation Report	P02079, p.37		
31	HASIC, Osman	1930	non-Serb	male	1	Exhumation Report	P02079, p.4	Multiple fractures of the frontal bone. The injuries were inflicted with a firearm at point-blank range.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Autopsy Report	P02080, p.63-64	Death was violent. Cause of death was injury to head. Head injury was caused by a discharged firearm.	
32	HROMALIC (ROMALIC), Vedad	1976	non-Serb	male	1	Exhumation Report	P02079, p.11	Death was caused by injuries inflicted with a firearm.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Autopsy Report	P02080, p.105-106	Death was violent. Cause of death was injury to head. Multiple fractures of the head bones were caused by a firearm discharged at point-blank range.	



Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
33	JAKUPOVIĆ, Ago	1935	non-Serb	male	1	Decision	P02097	Was killed on 20/21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
					3	Birth Certificate	P02098		
					4	Exhumation Report	P02079, p.18	There is a cut on the right side of his pharyngeal cartilage reaching halfway across. It indicates that a mechanical object with a sharp blade was used.	
					5	Autopsy Report	P02080, p.43-44	Death was violent. Cause of death was injury to cervical organs. Injury was caused by cutting with the blade of mechanical object like a knife or similar.	
34	JAKUPOVIĆ, Fadil	1958	non-Serb	male	1	Decision	P02099	Was killed on 20/21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2	Exhumation Report	P02079, p.26-27	Died a violent death as a result of the injuries inflicted to the head. He sustained multiple fractures to head which were inflicted with a firearm.	[REDACTED]
					3	[REDACTED]	[REDACTED]		
					4	Autopsy Report	P02080, p.76-77	Death is violent. Cause of death was injury to the head. Head injury with multiple bone fractures was caused by a discharged firearm.	

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
35	JAKUPOVIĆ, Fehim	1933	non-Serb	male	1		Autopsy Report	P02080, p.86-87	Death was violent. Cause of death was injury to thoracic spine and to medulla oblongata. Injury was caused by a discharged firearm.	[REDACTED]
					2		Exhumation Report	P02079, p.35-36	Died a violent death as a result of the injuries inflicted to his spine, thorax and brain-stem. The injuries were inflicted with a firearm.	[REDACTED]
					3		[REDACTED]	[REDACTED]		[REDACTED]
36	JAKUPOVIĆ, Idriz	1931	non-Serb	male	1		[REDACTED]	[REDACTED]		[REDACTED]
					2		Exhumation Report	P02079, p.22	Died a violent death immediately resulting from injuries inflicted to the head with a firearm.	[REDACTED]
					3		Autopsy Report	P02080, p.51-52	Died a violent death as a result of the injuries inflicted to the head with a firearm.	
					4		Decision	P02100	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	

Proof of Death

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
								[REDACTED]	[REDACTED]
37	JAKUPOVIĆ, Muharem	1954	non-Serb	male	1	Decision	P02122	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2	Decision	P02123	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					3	Decision	P02135	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					4	Autopsy Report	P02080, p.53-54	Death was violent. Cause of death was injury to cervical spine. Injuries to lower jaw and cervical spine were caused by a firearm.	
					5	Decision	P02134	Was killed on 20 or 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					6	[REDACTED]	[REDACTED]		
					7	Exhumation Report	P02079, p.28-29	The injuries to his lower jaw and cervical vertebrae were inflicted with a firearm.	

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	
					Source#						
38	JAKUPOVIĆ, Saifet	1942	non-Serb	male	1		[REDACTED]	[REDACTED]		[REDACTED]	
					2		Autopsy Report	P02080, p.19-20	Death was violent. Cause of death was injury to head. Head injury with multiple fractures was caused by a discharged firearm.	[REDACTED]	
					3		Exhumation Report	P02079, p.27-28	Cause of death was injuries which were violently inflicted to the head with a firearm.	[REDACTED]	
39	KAMBER, Muharem	1932	non-Serb	male	1		Decision	P02114	Died on 20-21 September 1995 in Sasina.	[REDACTED]	
					2		Exhumation Report	P02079, p.20-21	Died a violent death as a result of the injuries inflicted to his head with a firearm.	[REDACTED]	
					3		Autopsy Report	P02080, p.65-66	Death was violent. Cause of death was injury to head. Head injury was caused by a discharged firearm.		
40	KAMBER, Osman	1958	non-Serb	male	4		[REDACTED]	[REDACTED]			
					1		Autopsy Report	P02080, p.49-50	Death was violent. Cause of death was injury to thorax. Injury to thorax was caused by a discharged firearm.	[REDACTED]	
					2		[REDACTED]	[REDACTED]		[REDACTED]	
41	KAMBER, Zijad	1936	non-Serb	male	3		Exhumation Report	P02079, p.21-22	Died a violent death immediately resulting from injuries inflicted to his thoracic organs with a firearm.		
					1		Autopsy Report	P02080, p.7-8	Death was violent. Cause of death injury to head and thorax. Injuries to head and thorax caused by a discharged firearm.	[REDACTED]	
					2		[REDACTED]	[REDACTED]		[REDACTED]	
					3		Exhumation Report	P02079, p.22-23	Died a violent death immediately resulting from injuries inflicted to the head with a firearm.		

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
					Source#					
42	KARABEG, Ismet	1942	non-Serb	male	1		Autopsy Report	P02080, p.67-68(BCS)	Death was violent. Cause of death was suffocation. Fractured ribs on the left and right sides and fractured sternum were caused by a blow with a blunt object.	[REDACTED]
					2		Exhumation Report	P02079, p.35	Died a violent death as a result of the injuries inflicted to the ribcage with a mechanical weapon. Fractures of the left and right side of the ribs, as well of the thoracic bone, inflicted with a blunt mechanical object.	[REDACTED]
					3		[REDACTED]	[REDACTED]		
43	KASUMOVIĆ, Hakija	1942	non-Serb	male	1		[REDACTED]	[REDACTED]		[REDACTED]
					2		Decision	P02115		[REDACTED]
					3		Autopsy Report	P02080, p.74-75	Death was violent. Cause of death was destruction of the head. Destruction of the head was caused by a firearm discharged at point-blank range.	[REDACTED]
					4		Exhumation Report	P02079, p.19	Died a violent death immediately resulting from injuries inflicted to the head with a firearm.	
44	KUMALIĆ, Bećo	1929	non-Serb	male	1		Decision	P02101	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2		Exhumation Report	P02079, p.21	Died a violent death immediately resulting from injuries inflicted to the head with a firearm at blank-point range.	[REDACTED]
					3		[REDACTED]	[REDACTED]		
					4		Autopsy Report	P02080, p.80-81	Death was violent. Cause of death was injury to the head. Head injury was caused by a discharged firearm.	

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
45	KURBEGOVIĆ, Husein	1932	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Exhumation Report	P02079, p.33-34	Died a violent death as a result of the injuries inflicted to his head. Multiple fractures were inflicted to the head with a firearm at point-blank range.	[REDACTED]
					3	Autopsy Report	P02080, p.37-38	Death was violent. Cause of death was injury to head. Multiple fractures of the head bones were caused by a firearm discharged at point blank range.	
46	KURSUMOVIĆ, Rifet (Rifat)	1926	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Exhumation Report	P02079, p.5-6	Died a violent death. The injuries were inflicted with a firearm at point-blank range.	[REDACTED]
					3	Autopsy Report	P02080, p.55-56	Death was violent. Cause of death was injury to head. Head injury was caused by a discharged firearm.	
47	KURTOVIĆ, Mehmed	1926	non-Serb	male	1	Autopsy Report	P02080, p.90-91	Death was violent. Cause of death was injury to head. Multiple fractures of the head bones were caused by a firearm discharged at point-blank range.	[REDACTED]
					2	Exhumation Report	P02079, p.30-31	Died a violent death as a result of the injuries inflicted to his head. Multiple fractures were inflicted to the head with a firearm at point-blank range.	[REDACTED]
					3	[REDACTED]	[REDACTED]		

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
48	LASIĆ, Adem	1926	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Exhumation Report	P02079, p.34	Death was violent. Cause of death was injury to the head caused by a discharged firearm.	[REDACTED]	
					3	Autopsy Report	P02080, p.82-83	Died as a result of the injuries inflicted to the head with a firearm.		
49	MAHIĆ, Muharem	1927	non-Serb	male	1	Autopsy Report	P02080, p.33-34	Death was violent. Cause of death was injury to head caused by a discharged firearm.	[REDACTED]	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]	
					3	Exhumation Report	P02079, p.19-20	Died a violent death immediately resulting from injuries inflicted to the head with a firearm.		
50	MATOŠ, Ratko	1932	unknown	male	1	Decision	P02102	Was killed on 9 September 1995 in Sasina, Sanski Most.	[REDACTED]	
51	MUSIĆ, Karanfil	1966	non-Serb	male	1	Autopsy Report	P02080, p.17-18	Death was violent. Cause of death was injuries to abdominal and thoracic organs by a discharged firearm.	[REDACTED]	[REDACTED]
					2	Exhumation Report	P02079, p.23-24	The death was caused by the injuries inflicted to the stomach and chest organs with a firearm.	[REDACTED]	
					3	[REDACTED]	[REDACTED]			
52	OMIĆ, Arif	1937	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
					2	Autopsy Report	P02080, p.27-28	Death was violent. Cause of death was injury to head caused by a discharged firearm.	[REDACTED]	
					3	Exhumation Report	P02079, p.29	Died a violent death as a result of the injuries inflicted to his head with a firearm.		

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
								[REDACTED]	[REDACTED]
53	OMIĆ, Taib	1936	non-Serb	male	1	Autopsy Report	P02080, p.1-2	Violent death caused by injury to the head. Injury to the head was inflicted by firearm.	[REDACTED]
					2	Exhumation Report	P02079, p.14-15	The injuries were inflicted with a firearm and were the direct cause of death.	[REDACTED]
					3	[REDACTED]	[REDACTED]		
					4	Decision	P02103	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					5	Marriage Certificate	P02104		
54	PASAČIĆ, Ibrahim	1925	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Exhumation Report	P02079, p.17	Died as result of the injuries inflicted to his head with a firearm. The ribs were fractured with a blunt object.	[REDACTED]
					3	Autopsy Report	P02080, p.3-4	Instant violent death caused by the destruction of head bones inflicted by a firearm fired at very close range. Rib fractures on the left and the right side combined with the injury to the sternum inflicted by a blunt object.	
					4	Decision	P02105	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	



Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	
									[REDACTED]
55	PASALIĆ, Avdo	1934	non-Serb	male	1	Autopsy Report	P02080, p.23-24	Death was violent. Cause of death was injuries to head and thorax caused by a discharged firearm.	[REDACTED]
					2	Exhumation Report	P02079, p.24-25	Died a violent as a result of the injuries inflicted to the ribcage with a firearm.	[REDACTED]
					3	[REDACTED]	[REDACTED]		
56	SADIĆ, Mustafa	1942	non-Serb	male	1	Decision	P02106	Died on 23 September 1995 in Sasina, Sanski Most.	[REDACTED]
57	SEKIĆ, Muharem	1926	non-Serb	male	1	Autopsy Report	P02080, p.115-116	Death was violent. Cause of death was injury to head. Multiple fractures of the roof of the skull, upper and lower jaws, and base of the skull were caused by a firearm discharged at point blank range.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Exhumation Report	P02079, p.31	Died a violent death as a result of the injuries inflicted to the head with a firearm fired at point-blank range.	
58	SINANOVIĆ, Ibrahim	1920	non-Serb	male	1	Decision	P02107	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					2	[REDACTED]	[REDACTED]		[REDACTED]
					3	Exhumation Report	P02079, p.37		

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
59	TALIĆ, Adnan	1977	non-Serb	male	1	Autopsy Report	P02080, p.78-79	Death was violent. Cause of death was injury to the head. Fracture of the left lower jaw and fracture of the base of the skull were caused by a strong blow with a blunt object.	[REDACTED]
					2	Exhumation Report	P02079, p.6-7	Died a violent death as a result of being struck with a mechanical instrument.	[REDACTED]
					3	[REDACTED]	[REDACTED]		
					4	Decision	P02124	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					5	Decision	P02125	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
60	TALIĆ, Besim	1979	non-Serb	male	1	Autopsy Report	P02080, p.39-40	Death was violent. Cause of death was injury to head caused by a firearm discharged at point-blank range.	[REDACTED]
					2	Decision	P02108	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					3	Exhumation Report	P02079, p.18	Died a violent death as a result of the injuries inflicted to the head with a firearm.	
					4	Birth Certificate	P02109		
					5	[REDACTED]	[REDACTED]		

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
61	TALIĆ, Djemal	1951	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	
					2	Exhumation Report	P02079, p.13-14	Died a violent death as a result of the injuries inflicted to the head with a firearm.	[REDACTED]	
					3	Autopsy Report	P02080, p.45-46	Death was violent. Cause of death was injury to head caused by a discharged firearm.		
62	TALIĆ, Haris	1973	non-Serb	male	1	Autopsy Report	P02080, p.123-124	Cause of death was injury to head caused by a discharged firearm.	[REDACTED]	
					2	Exhumation Report	P02079, p.7	Died a violent death as a result of the injuries inflicted to the head when he was shot at with a firearm at point-blank range.	[REDACTED]	
					3	[REDACTED]	[REDACTED]			

Proof of Death

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD		Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]	[REDACTED]
					Source#						
63	TALIĆ, Husein	1926	non-Serb	male	1		Decision	P02139	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]	[REDACTED]
					2		Autopsy Report	P02080, p.70-71	Death was violent. Cause of death was injury to head caused by a firearm discharged at point blank range.	[REDACTED]	
					3		Exhumation Report	P02079, p.6	Died a violent death as a result of the injuries inflicted to the head with a firearm at point-blank range.		
					4		Decision	P02127	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.		
					5		Decision	P02126	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.		
					6		[REDACTED]	[REDACTED]			
					7		Decision	P02138	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.		

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
64	TALIĆ, Ibraga	1967	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]
					2	Exhumation Report	P02079, p.15	Died as a result of the injuries inflicted to the head with a firearm.	[REDACTED]
					3	Decision	P02110	Was killed on 21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	
					4	Autopsy Report	P02080, p.111-112	Death was violent. Cause of death was injury to head caused by a discharged firearm.	
					5	Marriage Certificate	P02111		
65	TALIĆ, Muhamed	1952	non-Serb	male	1	Autopsy Report	P02080, p.47-48	Death was violent. Cause of death was injury to head caused by a discharged firearm.	[REDACTED]
					2	Exhumation Report	P02079, p.14	Died a violent death as a result of the injuries inflicted to the head with a firearm.	[REDACTED]
					3	[REDACTED]	[REDACTED]		
66	TALIĆ, Rasim	1937	non-Serb	male	1	Autopsy Report	P02080, p.101-102	Death was violent. Cause of death was injury to head caused by a discharged firearm.	[REDACTED]
					2	Decision	P02112	Was killed on 20-21 September 1995 in Sasina, Sanski Most. His body was identified among the 65 bodies of the victims found in a mass grave in Sasina, Sanski Most.	[REDACTED]
					3	[REDACTED]	[REDACTED]		
					4	Exhumation Report	P02079, p.9	Died a violent death as a result of the injuries inflicted to the head.	

Proof of Death

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
67	TALIĆ, Sefko	1933	non-Serb	male	1	Autopsy Report	P02080, p.119-120	Death was violent. Cause of death was injury in the region of thorax. Injuries in the region of thorax and left upper arm were caused by discharged firearm.	[REDACTED]
					2	Exhumation Report	P02079, p.16	Died as a result of the injuries inflicted to the ribcage with a firearm.	[REDACTED]
					3	[REDACTED]	[REDACTED]		
68	TALIĆ, Sulejman	1962	non-Serb	male	1	Autopsy Report	P02080, p.5-6	Death was violent. Cause of death was injury to head caused by a discharged firearm.	[REDACTED]
					2	Exhumation Report	P02079, p.3-4	Multiple fractures of the left and right sides of the lower jaw, nasal bone, facial bones on the left and right side, and of the lower left temporal bone. The above described injuries were inflicted with a firearm at point-blank range.	[REDACTED]
					3	[REDACTED]	[REDACTED]		

Victim Number	Victim Names	Y o B	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
Trnovo (Paragraph 61)										
1	ALISPAHIĆ, Azmir	1978	non-Serb	male	1	Identification Report & Letter	P02078		[REDACTED]	
					2	[REDACTED]	[REDACTED]		[REDACTED]	
					3	Order of Exhumation	P02077		[REDACTED]	
					4	DNA Analysis	P03135			
2	DELIC, Juso	1970	non-Serb	male	1	Identification Report & Letter	P02078		[REDACTED]	
					2	[REDACTED]	[REDACTED]		[REDACTED]	
					3	Order of Exhumation	P02077			
3	FEJZIĆ, Safet	1978	non-Serb	male	1	Identification Report & Letter	P02078		[REDACTED]	
					2	[REDACTED]	[REDACTED]		[REDACTED]	
					3	Order of Exhumation	P02077			
					4	DNA Analysis	P03135			
4	IBRAHIMOVIĆ, Smajil	un-known	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	
									[REDACTED]	
									[REDACTED]	
									[REDACTED]	
5	SALIHOVIĆ, Dinoj	1979	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	
					2	Order of Exhumation	P02077		[REDACTED]	
6	SALKIĆ, Sidik	1959	non-Serb	male	1	[REDACTED]	[REDACTED]		[REDACTED]	
					2	Order of Exhumation	P02077		[REDACTED]	

Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
<b>Zvornik (Paragraph 62)</b>									
1	AHMETOVIĆ, Mevludin (Šemsudin)	1962	non-Serb	male	1	Identification Report	P02214		[REDACTED]
					2	Forensic Expert Report	P02238	Entry-exit wound to the pelvis and possible condition following injury to the left upper arm.	[REDACTED]
2	AHMETOVIĆ, Nusret	1965	non-Serb	male	1	Identification Report	P02215		[REDACTED]
					2	Forensic Expert Report	P02239		[REDACTED]
3	ALAJBEGOVIĆ, Fahrudin	1929	non-Serb	male	1	Identification Report	P02216		[REDACTED]
					2	Forensic Expert Report	P02240	Head shattered, probably by gunshot.	[REDACTED]
4	AVDIĆ, Šemsudin	1954	non-Serb	male	1	Identification Report	P02230		[REDACTED]
5	BILALIĆ, Sabit	1943	non-Serb	male	1	Identification Report	P02217		[REDACTED]
					2	Forensic Expert Report	P02241	Head possibly shattered by gunshot.	[REDACTED]
6	BILALIĆ, Samir	1968	non-Serb	male	1	Identification Report	P02218		[REDACTED]
					2	Forensic Expert Report	P02242		[REDACTED]
7	BILALIĆ, Senad	1970	non-Serb	male	1	Identification Report	P02219		[REDACTED]
					2	Forensic Expert Report	P02243	Gunshot wound to the head and possibly to the abdomen and the right arm and leg.	[REDACTED]
8	DELIC, Hajrudin	1946	non-Serb	male	1	Missing Person Certificate	P02257	Date of Disappearance: 09/04/1992.	[REDACTED]
									[REDACTED]



Victim Number	Victim Names	Y oB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source	[REDACTED]
9	DUŠKUNOVIĆ, Hasan	1928	unknown	male	1	Identification Report	P02231		[REDACTED]
10	DŽONLIĆ, Salem	1960	unknown	male	1	Identification Report	P02232		[REDACTED]
11	HADŽIĆ, Edhem	1930	non-Serb	male	1	Identification Report	P02221		[REDACTED]
					2	Forensic Expert Report	P02245	Gunshot wound to the right side of the chest.	[REDACTED]
12	HADŽIA VDIĆ, Hazim	1938	non-Serb	male	1	Missing Person Certificate	P02256	Date of Disappearance: 08/04/1992.	[REDACTED]
13	HADŽIEFENDIĆ, Faruk	1945	non-Serb	male	1	Identification Report	P02233		[REDACTED]
14	HADŽIEFENDIĆ, Mensura	1950	non-Serb	female	1	Identification Report	P02234		[REDACTED]
15	HALILBAŠIĆ, Midhat	1959	unknown	male	1	Identification Report	P02235		[REDACTED]
16	HIDIĆ, Sead	1967	non-Serb	male	1	Identification Report	P02222		[REDACTED]
					2	Forensic Expert Report	P02246	Destruction of the head possibly caused by gunshot.	[REDACTED]
17	HIDIĆ, Senad	1972	non-Serb	male	1	Identification Report	P02223		[REDACTED]
					2	Forensic Expert Report	P02247		[REDACTED]
18	HUDOVIĆ, Asim	1958	non-Serb	male	1	Identification Report	P02225		[REDACTED]
					2	Forensic Expert Report	P02249	Head shattered, possibly by gunshot.	
19	HUDOVIĆ, Tajib	1929	non-Serb	male	1	Identification Report	P02224		[REDACTED]
					2	Forensic Expert Report	P02248		

Victim Number	Victim Names	YoB	Ethnicity	Sex	POD Source#	Source Type	Exhibit#	Circumstances of Death According to the Source		[REDACTED]
20	KOJIĆ, Ivo	1944	non-Serb	male	1	Identification Report	P02226		[REDACTED]	[REDACTED]
					2	Forensic Expert Report	P02250	Possible shattering of the head.	[REDACTED]	
21	KRTIČIĆ, Dedo	1933	non-Serb	male	1	Identification Report	P02220		[REDACTED]	[REDACTED]
					2	Forensic Expert Report	P02244	Head shattered, possibly by gunshot.	[REDACTED]	
22	KUJUNDŽIĆ, Fehim	1948	non-Serb	male	1	Identification Report	P02227		[REDACTED]	[REDACTED]
					2	Forensic Expert Report	P02251	Possible gunshot/explosion shattering the top and base of the skull.	[REDACTED]	
23	SABIROVIĆ, Izet	1939	non-Serb	male	1	Identification Report	P02228		[REDACTED]	[REDACTED]
					2	Forensic Expert Report	P02252	Shattering of greater part of skull possibly by gunshot.	[REDACTED]	
24	SEHIĆ, Hakija	1930	non-Serb	male	1	Identification Report	P02229		[REDACTED]	[REDACTED]
					2	Forensic Expert Report	P02253	Head shattered, possibly by gunshot.	[REDACTED]	
25	SEHIĆ, Hakija	1934	non-Serb	male	1	Identification Report	P02237		[REDACTED]	[REDACTED]
					1	Identification Report	P02236		[REDACTED]	
26	UZUNIĆ, Faruk	1952	non-Serb	male	1	Identification Report			[REDACTED]	

**UNITED NATIONS**

**INTERNATIONAL RESIDUAL MECHANISM FOR CRIMINAL TRIBUNALS**

**Case No. MICT-15-96-T**

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ &  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION***

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**ANNEX D**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**SerbianDB PERSONNEL FILES**

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		
P02855	<b>ALEKSIĆ, Goran</b>	Background Check Request; Background Check Report; Autobiography	SIMATOVIĆ (BCS ERN: 0608-9857; 0608-9887)	JATD (BCS ERN: 0608-9857)	[REDACTED]; name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	
P02596	<b>ANDELOVIĆ, Saša</b>	Autobiography; Background Check Report; JATD Questionnaire	SIMATOVIĆ (BCS ERN: 0608-9939)		[REDACTED]; 1996 Awards List (P00849, p.6); name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]			
P02703	<b>AŠĆERIĆ, Saša</b>				Name appears on [REDACTED] playlists
1D00407	<b>BABIĆ, Danilo</b>	Autobiography; Equipment Receipt; Request to join JPN MUP Serbia		JPN (BCS ERN: 0681-8512; 0681-8513)	
1D00346	<b>BAILOV, Zoran</b>	JPN Form; Autobiography			
P00839	<b>BAKLAJIĆ, Predrag</b>	Basic Information Form; Autobiography; Equipment Receipt; Request to join JPN MUP Serbia, Ilok	SIMATOVIĆ (BCS ERN: 0706-4850)		1996 Awards List (P00849, p.13); father's name appears on [REDACTED] playlists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P00553	<b>BANJAC, Durica</b>	Basic Information Form; Background Check Report; Autobiography; Background Check Request; Equipment Receipt; JPN Form; Background Check Request; JATD Questionnaire; Volunteer Questionnaire; Volunteer Personnel Card	SIMATOVIC (BCS ERN: 0706-4864; 0706-4872	JPN (BCS ERN: 0706-4892)	Kula Video (P00256); name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
P02856	<b>BERIĆ, Zoran</b>	Background Check Report; Autobiography; Equipment Receipt			1996 Awards List (P00849, p.6); name appears on [REDACTED] Poskok paylists
[REDACTED]	[REDACTED]			[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
P02704	<b>BOJANDIĆ, Nenad</b>	Basic Information Form; Autobiography; JATD Questionnaire; Background Check Request; Equipment Receipt; Volunteer Personnel Card; Request to Join JPN MUP Serbia, Lezimir	SIMATOVIĆ (BCS ERN: 0681-8628)		
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
P03780	<b>BOŽOVIĆ, Radonja</b>				
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]
P02858	<b>BUJOŠEVIĆ, Nenad</b>	JATD Questionnaire; Background Check Report			1996 Awards List (P00849, p.7); name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
P02859	<b>BUTINA, Desimir</b>	Background Check Request; JATD Questionnaire; JATD Form; JPN Personnel Card	SIMATOVIĆ (BCS ERN: 0609-4844; 0609-4849)	JATD (BCS ERN: 0609-4849)	[REDACTED]; name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]			
1D00166/ P02705 (excerpt)	<b>ĆULIBRK, Saša</b>	Basic Information Form			[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			

Annex D: SerbianDB personnel files

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02706	<b>DIMIĆ, Milan</b>	Basic Information Form; Autobiography; Volunteer Personnel Card; Equipment Receipt; Volunteer Questionnaire; Request to join JPN MUP Serbia, Lezimir	SIMATOVIĆ (BCS ERN: 0706-4907)		1996 Awards List (P00849, p.13); father's name appears on [REDACTED] paylists; mother's name appears on [REDACTED] paylists
P02707	<b>ĐOKIĆ, Željko</b>	JPN Form; Autobiography; Volunteer Personnel Card; Basic Information Form; Volunteer Questionnaire; Equipment Receipt			Name appears on 1 payroll
P02874	<b>DOKNIĆ, Dragoman</b>	Volunteer Personnel Card; Autobiography; Basic Information Form; Request to join JPN MUP Serbia, Lezimir			
P00845	<b>ĐORDEVIĆ, Dragan</b>	Background Check Request; Background Check Report; JPN Personnel Card; Basic Information Form; Volunteer Personnel Card; Equipment Receipt; Autobiography; Request to join JPN MUP Serbia, Lezimir	STANIŠIĆ (BCS ERN: 0613-1591)		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
P02860	<b>DRČA, Jovan</b>	JATD Questionnaire; Autobiography; Background Check Report; Equipment Receipt			Name appears on [REDACTED] <i>Poskok</i> paylists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]		[REDACTED]		
[REDACTED]	[REDACTED]				
P02359	<b>DUKIĆ, Miloš</b>	Background Check Request; Background Check Report; JATD Questionnaire			[REDACTED]; 1996 Awards List (P00849, p.7); name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]



Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02861	GAĆEŠA, Veljko	Autobiography; Equipment Receipt; JATD Questionnaire; Background Check Report			Name appears on [REDACTED] <i>Poskok</i> playlists
P00859	GALOVIĆ, Nedeljko	JATD Questionnaire; Autobiography; SMUP Employment Certificate; Background Check Report; Background Check Request	STANIŠIĆ (BCS ERN: 0608-7795), SIMATOVIĆ (BCS ERN: 0608-7827; 0608-7844)	JPN (BCS ERN: 0608-7846), JATD (BCS ERN: 0608-7829; 0608-7834)	[REDACTED]; name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P03310	<b>GORSKI, Aleksandar</b>	Volunteer Personnel Card; Volunteer Questionnaire; Background Check Request	STANIŠIĆ (BCS ERN: 0681-9056)		
P02709	<b>GRUJIĆ, Dragiša</b>	Equipment Receipt; Autobiography; Volunteer Questionnaire; Volunteer Personnel Card; Basic Information Form; Background Check Report; JATD Questionnaire; JATD Form; Request to join JPN MUP Serbia, Lezimir	SIMATOVIĆ (BCS ERN: 0706-4955; 0706-4968)	JPN (BCS ERN: 0706-4970)	1996 Awards List (P00849, p.8); name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]			
2D00324	<b>GULIĆ, Zoran</b>	Autobiography; Background Check Report; JATD Questionnaire	SIMATOVIĆ (BCS ERN: 0608-7905; 0608-7909; 0608-7911; 0608-7920)	JSO (BCS ERN: 0608-7870)	[REDACTED]
P02862	<b>ILIĆ, Aleksandar</b>	Autobiography; Background Check Report			Name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
P00263	<b>IVANOVIĆ, Živojin aka ŽIKA CRNOGORAC</b>	SMUP Certificate of Service; JPN Form; Equipment Receipt; Volunteer Personnel Card; Volunteer Questionnaire; Request to Join JPN MUP Serbia, Lezimir	SIMATOVIĆ (BCS ERN: 0609-0282)		1996 Awards List (P00849, p.8,11); Kula Video (P00256); [REDACTED]

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02710	<b>JANJATOVIĆ, Bogoslav</b>	Autobiography; Background Check Report; Basic Information Form; JATD Form; Background Check Request; JATD Questionnaire; Request to Join JPN MUP Serbia, Ilok	SIMATOVIĆ (BCS ERN: 0706-5008; 0706-5011; 0706-5012; 0706-5026)	JPN (BCS ERN: 0706-5028), JATD (BCS ERN: 0706-5005)	[REDACTED]; 1996 Awards List (P00849, p.8,9,11); name appears on [REDACTED] playlists
P02711	<b>JANKOVIĆ, Nebojša</b>	Basic Information Form; JATD Form; JPN Form; Background Check Request; JATD Questionnaire; Volunteer Questionnaire; Autobiography			Name appears on [REDACTED] playlists
P02712	<b>JELIČIĆ, Miloš</b>	Volunteer Personnel Card; Basic Information Form; Volunteer Questionnaire; Equipment Receipt; Autobiography; Background Check Request; Request to join JPN MUP Serbia, Lezimir			
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]		[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]				
P02273	<b>JOVANOVIĆ, Predrag</b>	Basic Information Form; JPN Personnel Card; Background Check Request; JATD Questionnaire; Volunteer Questionnaire; JPN Form; Autobiography; JATD Form			Name appears on [REDACTED] playlists
P02360	<b>JOVANOVIĆ, Zvezdan</b>		SIMATOVIĆ (BCS ERN: 0609-0253)	JPN (BCS ERN: 0609-0262)	[REDACTED]; 1996 Awards List (P00849, p.8,11); Kula Video (P00256); name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		
P02567	<b>KEREŠ, Janko</b>	JATD Form; Background Check Report	STANIŠIĆ (BCS ERN: 0681-9532), SIMATOVIĆ (BCS ERN: 0681-9567)		[REDACTED]; 1996 Awards List (P00849, p.7); name appears on [REDACTED] playlists
1D00629/ P02713 (excerpt)	<b>KESIĆ, Jugoslav</b>	Autobiography; Background Check Report; Equipment Receipt; JATD Questionnaire			Name appears on [REDACTED] <i>Poskok</i> playlists
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]
P00569	<b>KOJIĆ, Ilija</b>		STANIŠIĆ (BCS ERN: 0641-4514; 0641-4516), SIMATOVIĆ (BCS ERN: 0641-4522)	JSO (BCS ERN: 0641-4511)	1996 Awards List (P00849, p.8)
P02714	<b>KORF, Goran</b>	Basic Information Form			
P00522	<b>KOSTIĆ, Radoslav</b>	Autobiography	STANIŠIĆ (BCS ERN: 0641-4626; 0641-4640; 0641-4643; 0641-4655), SIMATOVIĆ (BCS ERN: 0641-4677)		1996 Awards List (P00849, p.5,9)
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P00264	<b>KOVAČEVIĆ, Borislav</b>	Basic Information Form; Autobiography; Equipment Receipt; Volunteer Personnel Card; Request to join JPN MUP Serbia, Ležimir			
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]				
[REDACTED]	[REDACTED]			[REDACTED]	[REDACTED]
P02357	<b>KRSMANOVIĆ, Dragoslav</b>	Autobiography; JATD Questionnaire			[REDACTED]; 1996 Awards List (P00849, p.6,8,11); name appears on [REDACTED] playlists (as recipient)
P02715	<b>KUJUNDŽIĆ, Jovan</b>	Volunteer Personnel Card; Equipment Receipt; Basic Information Form; Autobiography; Request to join JPN MUP Serbia, Lezimir			
[REDACTED]	[REDACTED]			[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
1D00686/ P02716 (excerpt)	<b>KUZMANOVIĆ, Zlatomir</b>	JATD Questionnaire; Autobiography; Background Check Report	STANIŠIĆ (BCS ERN: 0706-5143)	JATD (BCS ERN: 0706-5129)	[REDACTED]; name appears on [REDACTED] playlists
P01941	<b>LAČEVIĆ, Ranko</b>	Autobiography; Background Check Request; SMUP Employment Certificate; JATD Form; JATD Questionnaire	SIMATOVIĆ (BCS ERN: 0682-0024)	JATD (BCS ERN: 0682-0026)	Name appears on [REDACTED] playlists
P00262	<b>LAKA, Neven</b>	Volunteer Personnel Card; Equipment Receipt; Autobiography; Request to join JPN MUP Serbia, Lezimir			
[REDACTED]	[REDACTED]	[REDACTED]			
P02717	<b>LAZIĆ, Dimitrije</b>	SMUP Certificate of Service; JATD Questionnaire; Background Check Report; JPN Personnel Card; Autobiography; Equipment Receipt; Basic Information Form; Volunteer Questionnaire; JATD Form	SIMATOVIĆ (BCS ERN: 0609-6635)	JATD (BCS ERN: 0609-6630; 0609-6633)	[REDACTED]; 1996 Awards List (P00849, p.8,9,11); Kula Video (P00256); name appears on [REDACTED] playlists
P03311	<b>LAZOVIĆ, Marko</b>		STANIŠIĆ (BCS ERN: 0611-2049; 0611-2051; 0611-2059)		
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]
P02816	<b>LEMIC, Milenko</b>				

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]		[REDACTED]		
[REDACTED]	[REDACTED]				
[REDACTED]	[REDACTED]		[REDACTED]		
P03782	<b>LEMIC, Milenko</b>		ŠTANIŠIĆ (BCS ERN: 0680-5748)		
P02817	<b>LETICA, Milan</b>	Equipment Receipt; Autobiography; Basic Information Form; Volunteer Personnel Card; Request to join JPN MUP Serbia, Lezimir			1996 Awards List (P00849, p.13)
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
1D00687/ P02863 (excerpt)	<b>LUČIĆ, Miroslav</b>	Autobiography; Background Check Request; JATD Form; JATD Questionnaire	STANIŠIĆ (BCS ERN: 0706-5184), SIMATOVIĆ (BCS ERN: 0706-5172; 0706-5177)	JPN (BCS ERN: 0706-5176)	[REDACTED]; name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			



Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02864	<b>MAJSTOROVIĆ, Slobodan</b>	Background Check Request; JPN Form; Autobiography; JATD Form; Equipment Receipt; Basic Information Form; JPN Form; SMUP Certificate of Service; Background Check Report; Request to join JPN MUP Serbia, Ilok	SIMATOVIĆ (BCS ERN: 0706-5216; 0706-5217; 0706-5218; 0706-5219)	JPN (BCS ERN: 0706-5220), JSO (BCS ERN: 0706-5237; 0706-5238; 0706-5241; 0706-5247; 0706-5248)	1996 Awards List (P00849, p.9,12); name appears on [REDACTED] paylists
P02818	<b>MAKSIMOVIC, Milan</b>	Background Check Report; JATD Questionnaire	STANIŠIĆ (BCS ERN: 0643-4898; 0643-4912; 0643-4915), SIMATOVIĆ (BCS ERN: 0643-4874; 0643-4875)	JATD (BCS ERN: 0643-4875; 0643-4911)	[REDACTED]; Kula Video (P00256); name appears on [REDACTED] paylists
2D00323	<b>MAKSIMOVIC, Miroslav</b>	Background Check Report; JATD Form; Basic Information Form; JATD Questionnaire; JPN Form	SIMATOVIĆ (BCS ERN: 0609-6741; 0609-6744)		[REDACTED]; 1996 Awards List (P00849, p.6); appears on [REDACTED] paylists
P02819	<b>MAKSIMOVIC, Radisa</b>	JATD Form; Volunteer Questionnaire; Basic Information Form; JPN Form; Autobiography			Name appears on [REDACTED] paylists
P02821	<b>MALIVUK, Gavra</b>	Equipment Receipt; JPN Form; Volunteer Personnel Card; Autobiography; Background Check Request; Request to Join JPN MUP Serbia, Lezimir			Name appears on 1 paylist
1D00630/ P02865 (excerpt)	<b>MANDIĆ, Željko</b>	Autobiography; Background Check Report; JATD Questionnaire			[REDACTED]; Name appears on [REDACTED] paylists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
P02822	<b>MATIĆ, Goran</b>	Basic Information Form; Volunteer Questionnaire; JPN Form; JATD Form; Autobiography			Name appears on [REDACTED] paylists
P00208	<b>MEDAKOVIĆ, Saša</b>	Request to join JPN MUP Serbia, Illok; Volunteer Questionnaire; Volunteer Personnel Card			1996 Awards List (P00849, p.13); father's name appear on [REDACTED] paylists; mother's name appears on [REDACTED] paylists
2D00459	<b>MIČIĆ, Radivoje</b>		ŠTANISIĆ (BCS ERN: 0682-2728); SIMATOVIĆ (BCS ERN: 0685-2755)		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
P02823	<b>MILANOVIĆ, Mirko</b>	Background Check Request; JPN Form; JATD Questionnaire; Volunteer Questionnaire; Basic Information Form; Autobiography; JATD Form			[REDACTED]
P02866	<b>MILIĆ, Božidar</b>	Autobiography; Background Check Report; Equipment Receipt			Name appears on [REDACTED] paylists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02824	<b>MILIĆ, Miko</b>	Background Check Request; JPN Form; Volunteer Questionnaire; Basic Information Form; JATD Questionnaire; JATD Form			Name appears on [REDACTED] paylists
P02594	<b>MILIVOJEVIĆ, Slađana</b>	Background Check Request; Background Check Report; JATD Form; JATD Questionnaire	SIMATOVIĆ (BCS ERN: 0609-6797; 0609-6800; 0609-6801)	JPN (BCS ERN: 0609-6803)	[REDACTED]; name appears on [REDACTED] paylists
P02867	<b>MILJEVIĆ, Nikica</b>	Autobiography; Background Check Report; Equipment Receipt; JATD Questionnaire			
2D00221	<b>MILJKOVIĆ, Radmilo</b>	Basic Information Form			
P02050	<b>MILJKOVIĆ, Slobodan</b>	Basic Information Form			[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			
P02296	<b>MILOVANOVIĆ, Milenko</b>	JATD Questionnaire; Background Check Request; JATD Form; Autobiography; JPN Personnel Card; Equipment Receipt; Request to Join JPN MUP Serbia, Lezimir	STANIŠIĆ (BCS ERN: 0609-6969), SIMATOVIĆ (BCS ERN: 0609-6970)	JPN (BCS ERN: 0609-6972)	[REDACTED]; 1996 Awards List (P00849, p.6,8,9,11); name appears on [REDACTED] paylists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02868	<b>MIRKOVIĆ, Jovo</b>	Background Check Report; JATD Questionnaire; Equipment Receipt; Autobiography			Name appears on [REDACTED] <i>Poskok</i> paylists
P02570	<b>MIRKOVIĆ, Miroslav</b>	SMUP Employment Certificate; Basic Information Form; Volunteer Questionnaire; SMUP Certificate of Service; JATD Questionnaire; Background Check Request; JPN Form	SIMATOVIĆ (BCS ERN: 0608-8185; 0608-8208)	JPN (BCS ERN: 0608-8209)	[REDACTED]; 1996 Awards List (P00849, p.6); name appears on [REDACTED] paylists
ŠREDACTEDĆ	ŠREDACTEDĆ	ŠREDACTEDĆ			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		
P00160	<b>MOMČILOVIĆ, Dušan</b>	Background Check Report; Autobiography; JATD Questionnaire	SIMATOVIĆ (BCS ERN: 0706-5349)	JSO (BCS ERN: 0706-5311; 0706-5314; 0706-5323; 0706-5330)	[REDACTED]; 1996 Awards List (P00849, p.8,9,11); Kula Video (P00256); name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]
P02826	NEŠKOVIĆ, Boško	Basic Information Form; JPN Personnel Card			
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]		[REDACTED]		
P02875	NOVOVIĆ, Dušan	Background Check Request; Equipment Receipt; Volunteer Questionnaire; Volunteer Personnel Card	STANIŠIĆ (BCS ERN: 0682-0675)		
1D00093	OBRADOVIĆ, Ljubomir	Background Check Report; Autobiography; Basic Information Form; Volunteer Questionnaire; Background Check Request; Equipment Receipt; Volunteer Personnel Card; Request to Join JPN MUP Serbia, Lezimir		JPN (BCS ERN: 0704-2641)	1996 Awards List (P00849, p.13); wife's name appears on on [REDACTED] paylists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02827	<b>OBRENOVIĆ, Zoran</b>	JATD Form; JPN Form; Volunteer Questionnaire; Basic Information Form; Autobiography: JATD Questionnaire; Background Check Request			Name appears on [REDACTED] paylists
P00261	<b>OLUIĆ, Dragan</b>	JATD Form; Equipment Receipt; Autobiography; SMUP Employment Certificate; Background Check Request; Basic Information Form; Equipment Receipt; Request to join JPN MUP Serbia, Ilok	SIMATOVIĆ (BCS ERN: 0682-0713)	JPN (BCS ERN: 0682-0715)	1996 Awards List (P00849, p.11); Kula Video (P00256); name appears on [REDACTED] paylists
P01972	<b>OPAČIĆ, Goran</b>	Background Check Report; Autobiography; Poskok Equipment Receipt; JATD Questionnaire			1996 Awards List (P00849, p.8); Kula Video (P00256); name appears on [REDACTED] Poskok paylists
P02361	<b>OPAČIĆ, Miloš</b>	Background Check Report; Autobiography; Poskok Equipment Receipt; JATD Questionnaire			1996 Awards List (P00849, p.6); name appears on [REDACTED] Poskok paylists
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
P00270	<b>ORLOVIĆ, Dušan</b>		STANIŠIĆ (BCS ERN: 0641-4573), SIMATOVIĆ (BCS ERN: 0641-4598; 0641-4601; 0641-4602)		1996 Awards List (P00849, p.8,9,12); Kula Video (P00256)
P02828	<b>PAJIĆ, Mile</b>	Autobiography, Equipment Receipt; Request to Join JPN MUP Serbia, Lezimir; Volunteer Personnel Card			[REDACTED]
P02829	<b>PAJIĆ, Sreten</b>	SMUP Certificate of Service; JATD Questionnaire; Basic Information Form; Autobiography; JPN Personnel Card	SIMATOVIĆ (BCS ERN: 0609-7187)		[REDACTED]; 1996 Awards List (P00849, p.7); name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	
P02830	<b>PAVIĆ, Branko</b>		STANIŠIĆ (BCS ERN: 0641-4535; 0641-4537), SIMATOVIĆ (0641- 4540)		
P02831/ 2D00893 (excerpt)	<b>PAVLOVIĆ, Branko</b>	Basic Information Form; Background Check Report; Autobiography; JPN Personnel Card; Volunteer Personnel Card; Equipment Receipt; Request to Join JPN MUP Serbia, Lezimir			
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
P02832	<b>PETKOVIĆ, Novica</b>	JPN Form; JATD Questionnaire; Volunteer Questionnaire; Basic Information Form; JATD Form; Autobiography			Name appears on [REDACTED] playlists
P02358	<b>PETRAKOVIĆ, Mićo</b>	Autobiography; SMUP Employment Certificate; Background Check Report; JATD Questionnaire	SIMATOVIĆ (BCS ERN: 0609-5855; 0609-5859)		[REDACTED]; 1996 Awards List (P00849, p.6); name appears on [REDACTED] playlists
P00258	<b>PILIPOVIĆ, Nikola</b>	Autobiography; Volunteer Personnel Card; Background Check Request; JPN Form; Volunteer Questionnaire; Equipment Receipt; JPN Personnel Card; JATD Questionnaire; Background Check Report; Basic Information Form; Request to Join JPN MUP Serbia, Lezimir	SIMATOVIĆ (BCS ERN: 0706-5499)	JATD (BCS ERN: 0706-5499)	Kula Video (P00256); name appears on [REDACTED] playlists
2D00322	<b>PLAHUTA, Dejan</b>	Background Check Report; Background Check Request; JATD Questionnaire			[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			
P02833	<b>POPIVODA, Milenko</b>		STANIŠIĆ (BCS ERN: 0611-2258; 0611-2261; 0611-2322)		



Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P00500	<b>POPOVIĆ, Milenko</b>	Autobiography; Request to join JPN MUP Serbia, Lezimir; JPN Personnel Card; Volunteer Personnel Card; Equipment Receipt; Basic Information Form; Volunteer Questionnaire; JPN Form; JATD Form; Background Check Request	SIMATOVIĆ (BCS ERN: 0706-5547)	JPN (BCS ERN: 0706-5549), JATD (BCS ERN: 0706-5539)	1996 Awards List (P00849, p.9,12); name appears on [REDACTED] playlists
P02834	<b>POPOVIĆ, Miomir</b>	Background Check Report; Equipment Receipt; Background Check Request; JPN Personnel Card; Basic Information Form; JATD Form; Autobiography; JATD Questionnaire			[REDACTED]; Kula Video (P00256); name appears on [REDACTED] playlists
P02600	<b>PRICA, Predrag</b>	JATD Questionnaire; Background Check Request	SIMATOVIĆ (BCS ERN: 0706-5631; 0706-5636)	JATD (BCS ERN: 0706-5657)	1996 Awards List (P00849, p.9,11); Kula Video (P00256); name appears on [REDACTED] playlists
P02566	<b>PRODANIĆ, Milan</b>		STANIŠIĆ (BCS ERN: 0611-1580; 0611-1581)		1996 Awards List (P00849, p.8,11)
P00265	<b>PUPOVAC, Nikola</b>	JATD form; Equipment Receipt; Basic Information Form; Background Check Request; Request to join JPN MUP Serbia, Ilok			1996 Awards List (P00849, p.9,11); Kula Video (P00256); name appears on [REDACTED] playlists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02835	<b>RADIĆ, Svetozar</b>	Request to join JPN MUP Serbia, Lezimir; Basic Information Form; Autobiography; Volunteer Personnel Card; Equipment Receipt; Volunteer Questionnaire			
P00855	<b>RADIOVJEVIĆ, Milutin</b>	Background Check Report; JATD Questionnaire; SMUP Employment Certificate; JATD Form	SIMATOVIĆ (BCS ERN: 0681-9597; 0681-9600; 0681-9619)		1996 Awards List (P00849, p.8,9,11); Kula Video (P00256); name appears on [REDACTED] paylists
1D00715/ P02297 (excerpt)	<b>RADONJIĆ, Milan</b>	Background Check Report; Background Check Request	SIMATOVIĆ (BCS ERN: 0637-6859; 0637-6876); STANIŠIĆ (BCS ERN: 0637-6902; 0637-6907; 0637-6908; 0637-6910)		[REDACTED]; 1996 Awards List (P00849, p.8,9,11); name appears on [REDACTED] paylists as a recipient
P02568	<b>RADONJIĆ, Milan</b>	JATD Form			[REDACTED]; 1996 Awards List (P00849, p.8,9,11); name appears on [REDACTED] paylists as a recipient
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	
[REDACTED]	[REDACTED]				
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P00233	<b>RAIĆ, Zoran</b>	Background Check Report; Autobiography; JATD Questionnaire; SMUP Employment Certificate	STANIŠIĆ (BCS ERN: 0643-5229), SIMATOVIĆ (BCS ERN: 0643-5228)	JATD (BCS ERN: 0643-5228), JSO (BCS ERN: 0643-5214; 0643-5238)	[REDACTED]; 1996 Awards List (P00849, p.6,8,9,11); Kula Video (P00256); name appears on [REDACTED] playlists
P00234	<b>RAIĆ, Zoran</b>	Equipment Receipt; Autobiography; JATD Form; Background Check Report; SMUP Employment Certificate	SIMATOVIĆ (BCS ERN: 0608-8260)	JSO (BCS ERN: 0608-8215)	[REDACTED]; 1996 Awards List(P00849, p.6,8,9,11); Kula Video (P00256); name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
P02869	<b>RAKONJAC, Rade</b>				[REDACTED]
P02836	<b>RANKIĆ, Milan</b>	JPN Form			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P00266	<b>RAŠKOVIĆ, Radomir</b>	Request to join JPN MUP Serbia, Ilok; Volunteer Personnel Card; JPN Personnel Card; Basic Information Form; Volunteer Questionnaire; Equipment Receipt; JATD Equipment Receipt; Background Check Request; JATD Questionnaire; JATD Form	SIMATOVIĆ (BCS ERN: 0706-5686)	JPN (BCS ERN: 0706-5669)	1996 Awards List (P00849, p.9,11); Kula Video (P00256); name appears on [REDACTED] playlists
P00830	<b>RISTOVIĆ, Zoran</b>	JATD Questionnaire; JATD Form (blank)	SIMATOVIĆ (BCS ERN: 0682-1467)	JATD (BCS ERN: 0682-1483)	1996 Awards List (P00849, p.9,11); name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]			
P02870	<b>ŠARE, Nenad</b>	Autobiography; Background Check Report; JATD Questionnaire; Equipment Receipt			Name appears on [REDACTED] <i>Poskok</i> playlists
[REDACTED]	[REDACTED]	[REDACTED]			
ŠREDACTED Ć	ŠREDACTEDĆ		ŠREDACTEDĆ		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P00831	<b>SIMATOVIĆ, Franko</b>	Autobiography; Background Check Request; Background Check Report: these are all from the 1970s but show that the MUP used these procedures for employment consistently	STANIŠIĆ (BCS ERN: 0608-1588; 0608-1589; 0608-1591; 0608-1593-0608-1594; 0608-1658),  SIMATOVIĆ (BCS ERN: 0608-1546; 0608-1555; 0608-1568; 0608-1571; 0608-1573-0608-1584; 0608-1586; 0608-1591-0608-1592; 0608-1597-0608-1599; 0608-1602; 0608-1604; 0608-1613; 0608-1615-0608-1618; 0608-1620-0608-1621; 0608-1624; 0608-1626; 0608-1630; 0608-1634; 0608-1638; 0608-1640; 0608-1642; 0608-1644; 0608-1646; 0608-1648; 0608-1650; 0608-1652; 0608-1658)		1996 Awards List (P00849, p.8,11); Kula Video (P00256); authored [REDACTED] playlists
P02871	<b>SIMIĆ, Nikola</b>	Background Check Report			1996 Awards List (P00849, p.8,9,11); name appears on [REDACTED] Poskok playlists
P02838	<b>SOLDO, Radivoje</b>	Volunteer Questionnaire; Equipment Receipt			
P02839	<b>SPASOJEVIĆ, Predrag</b>	Volunteer Personnel Card; Autobiography; Equipment Receipt; JATD Questionnaire			
1D00631/ P02591 (excerpt)	<b>STAKIĆ, Slobodan</b>	Background Check Request; Background Check Report; JATD Questionnaire	SIMATOVIĆ (BCS ERN: 0608-8375; 0608-8383)	JATD (BCS ERN: 0608-8383)	[REDACTED]; 1996 Awards List (P00849, p.6); name appears on [REDACTED] playlists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02840	<b>STANIŠIĆ, Jovica</b>	Background Check Request; Background Check Report	STANIŠIĆ (BCS ERN: 0608-2035; 0608-2049; 0608-2066-0608-2067; 0608-2069; 0608-2070-0608-2097; 0608-2099; 0608-2101-0608-2102; 0608-2104; 0608-2107; 0608-2109; 0608-2111; 0608-2114; 0608-2121; 0608-2123-0608-2125; 0608-2128; 0608-2132; 0608-2136; 0608-2140; 0608-2146; 0608-2148; 0608-2150)		Anniversary/Security Day 1996 Awards List (P00849, p.8,9,11); Kula Video (P00256)
P02569	<b>STANOJEVIĆ, Dragutin</b>	SMUP Certificate of Service; Autobiography; JATD Questionnaire; Background Check Request; Basic Information Form; JPN Person Card; JATD Form	SIMATOVIĆ (BCS ERN: 0608-8292)	JATD (BCS ERN: 0608-8292; 0608-8298)	[REDACTED]; name appears on [REDACTED] playlists
P02841	<b>STOJANOVIĆ, Stojan</b>	Background Check Request; Basic Information Form; Background Check Report; Volunteer Personnel Card; Equipment Receipt; Volunteer Questionnaire	STANIŠIĆ (BCS ERN: 0608-8394)		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
P02590	<b>ŠUVARA, Draško</b>	SMUP Employment Certificate; Background Check Report; JATD Questionnaire; JATD Equipment Receipt; JATD Form	STANIŠIĆ (BCS ERN: 0609-6070), SIMATOVIĆ (BCS ERN: 0609-6069; 0609-6086)		[REDACTED]; 1996 Awards List (P00849, p.6); name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
P02842	<b>TEOFANOVIĆ, Žarko</b>			JPN (BCS ERN: 0706-5729)	1996 Awards List (P00849, p.13); wife's name appears on [REDACTED] playlists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02843	<b>TODOROVIC, Gorgina</b>	Background Check Report; JATD Form; Background Check Request; Volunteer Questionnaire; Basic Information Form; JPN Form; JATD Questionnaire; Equipment Receipt; Autobiography	SIMATOVIĆ (0682-1635)		Name appears on [REDACTED] paylists
[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
P02844	<b>TRIFUNOVIC, Milenko</b>	JPN Form; Basic Information Form; JPN Personnel Card; JATD Form; Autobiography; JATD Questionnaire; Volunteer Questionnaire; Equipment Receipt			Name appears on [REDACTED] paylists



Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02845	<b>TRIFUNOVIĆ, Mirko</b>	JATD Questionnaire; JATD Form; Autobiography; JPN Form; Background Check Request			Name appears on [REDACTED] playlists
[REDACTED]	[REDACTED]				
P02846	<b>UGLJEŠIĆ, Aleksandar</b>	Autobiography		JPN (BCS ERN: 0682-2232; 0682-2233)	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			
P03312	<b>VASILJKOVIĆ, Dragan</b>		SIMATOVIĆ (BCS ERN: 0682-2270; 0682-2271)		1996 Awards List (P00849, p.8,9,10); Kula Video (P00256)
[REDACTED]	[REDACTED]	[REDACTED]			

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02849	<b>VLADIĆ, Damir</b>	Request to Join JPN MUP Serbia, Lezimir; Equipment Receipt; Volunteer Personnel Card; JPN Personnel Card; Basic Information Form; Autobiography; Volunteer Questionnaire			1996 Awards List (P00849, p.9,11)
[REDACTED]	[REDACTED]	[REDACTED]			
P00260	<b>VUČKOVIĆ, Borjan</b>	Basic Information Form; Autobiography			1996 Awards List (P00849, p.13)
P00259	<b>VUČKOVIĆ, Ilija</b>	Volunteer Personnel Card; Basic Information Form; Equipment Receipt; Volunteer Questionnaire; Request to join JPN MUP Serbia, Lezimir; SMUP Certificate of Service			1996 Awards List (P00849, p.9,11)
[REDACTED]	[REDACTED]	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]			
P02850	<b>VUKOVIĆ, Aleksandar</b>	Basic Information Form; Volunteer Personnel Card; Equipment Receipt; Background Check Request; Autobiography	STANIŠIĆ (BCS ERN: 0682-2318)		1996 Awards List (P00849, p.13)
[REDACTED]	[REDACTED]		[REDACTED]		[REDACTED]

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
P02851	<b>ZBUĆNOVIĆ, Perica</b>	Background Check Report; Background Check Request; Equipment Receipt; Basic Information Form; Volunteer Personnel Card; Volunteer Questionnaire; Autobiography; JPN Form; Request to Join JPN MUP Serbia, Lezimir		JPN (BCS ERN: 0682-2324)	[REDACTED]
P02852	<b>ZEČEVIĆ, Budimir</b>	Autobiography; Request to join JPN MUP Serbia, Lezimir; Basic Information Form; Equipment Receipt; Background Check Request; Volunteer Personnel Card; Volunteer Questionnaire; JATD Questionnaire; JATD Form; Background Check Report	STANIŠIĆ (BCS ERN: 0706-5864), SIMATOVIĆ (BCS ERN: 0706-5855; 0706-5868)	JPN (BCS ERN: 0706-5870)	1996 Awards List (P00849, p.9,12); name appears on [REDACTED] paylists
P02872	<b>ZELIĆ, Milorad</b>	JATD Questionnaire; Background Check Report; JPN Form; JATD Form; Autobiography; Basic Information Form; JPN Personnel Card	SIMATOVIĆ (BCS ERN: 0609-0027)	JATD (BCS ERN: 0609-0032)	[REDACTED]; name appears on [REDACTED] paylists
2D00222	<b>ZIROJEVIĆ, Dragan</b>	Volunteer Questionnaire; Equipment Receipt			
P02853	<b>ZIVANOVIĆ, Zdravko</b>	JATD Form; Autobiography; Basic Information Form; Volunteer Questionnaire			Name appears on [REDACTED] paylists

Exhibit Number	SerbianDB Personnel File of:	Standard Forms	Signature or Initials of the Accused	JPN/JATD/ JSO Stamp	Corroborating Documents
[REDACTED]	[REDACTED]	[REDACTED]			[REDACTED]
P02873	<b>ŽIŽIĆ, Veselin</b>	JPN Form	SIMATOVIĆ (BCS ERN: 0682-2389)		
[REDACTED]	[REDACTED]	[REDACTED]			
P02362	<b>ZVIZDIĆ, Dragoje</b>	Volunteer Questionnaire; Basic Information Form; JPN Form; Background Check Request; JATD Questionnaire; SMUP Certificate of Service	SIMATOVIĆ (BCS ERN: 0609-0142)	JPN (BCS ERN: 0609-0143)	[REDACTED]; name appears on [REDACTED] paylists

**UNITED NATIONS**

**INTERNATIONAL RESIDUAL MECHANISM FOR CRIMINAL TRIBUNALS**

**Case No. MICT-15-96-T**

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ &  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION***

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**ANNEX E**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**PAYMENTS MADE BY THE SerbianDB**

***PUBLIC REDACTED VERSION***

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**ANNEX E.1**

**TO PROSECUTION FINAL TRIAL BRIEF**

---

**INDIVIDUAL SerbianDB PER DIEM PAYMENTS**

## Annex E.1: Individual SerbianDB Per Diem Payments

This Annex sets out for each individual discussed in Annexes A and D a list of the SerbianDB playlists on which his/her name appears, if any. For playlists followed by the notation “\*\*” the relevant year does not appear on the face of the list, though the month and days (where indicated) do. As discussed elsewhere in the Brief, these lists are from [REDACTED] and 1994.<sup>1</sup>

### **A L E K S I Ć , G o r a n ( P 0 2 8 5 5 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.2(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.3(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.6(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.5(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.5(BCS), JATD playlist for 16-31 March 1994\*\*

[REDACTED]

P00828, p.12(ENG), JATD playlist for 16-30 November 1995

P00829, p.5(ENG), JATD playlist for 01-15 December 1995

P01155, p.6(ENG), JATD playlist for 16-31 December 1995

---

### **A N Đ E L O V I Ć S a š a ( P 0 2 5 9 6 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.10(ENG), JATD playlist for 16-30 November 1995

P00829, p.2(ENG), JATD playlist for 01-15 December 1995

P01155, p.2(ENG), JATD playlist for 16-31 December 1995

---

### **A Š Ć E R I Ć Š a š a ( P 0 2 7 0 3 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.22(ENG), JATD playlist for 16-30 November 1995

P00829, p.56(ENG), JATD playlist for 01-15 December 1995

P01155, p.32(ENG), JATD playlist for 16-31 December 1995

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<sup>1</sup> Cross-reference Section II.D.2(b)(vi)c.

Annex E.1: Individual SerbianDB Per Diem Payments

[ R E D A C T E D ]

[REDACTED]

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**B A K L A J I Ć Ž i v k o**

(Father of Predrag BAKLAJIĆ, P00839)

Name appears on [REDACTED] playlists:

P00840, p.3(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.2(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.4(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.4(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.6(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.2(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.7(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.7(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.6, 10(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.69(ENG), JATD playlist for 16-30 November 1995

P00829, p.19(ENG), JATD playlist for 01-15 December 1995

P01155, p.19(ENG), JATD playlist for 16-31 December 1995

---

**B A N J A C Đ u r i c a ( P 0 0 5 5 3 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P02384, p.1(BCS), SerbianDB playlist for 1-3 June 1993

[REDACTED]

---

[ R E D A C T E D ]

[REDACTED]

---

**B E R I Ć Z o r a n ( P 0 2 8 5 6 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.2(ENG), JATD playlist for 16-30 November 1995

P00829, p.31(ENG), JATD playlist for 01-15 December 1995

P01155, p.22(ENG), JATD playlist for 16-31 December 1995

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Annex E.1: Individual SerbianDB Per Diem Payments

[REDACTED]

P02582, p.2(ENG), JATD playlist for 24-31 January 1994\*\*  
P02583, p.4(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.4(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.6(BCS), JATD playlist for 16-31 March 1994\*\*  
P02586, p.2(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.7(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.7(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.6, 10(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.69(ENG), JATD playlist for 16-30 November 1995  
P00829, p.19(ENG), JATD playlist for 01-15 December 1995  
P01155, p.19(ENG), JATD playlist for 16-31 December 1995

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**D O K I Ć Ž e l j k o ( P 0 2 7 0 7 )**

Name appears on 1 playlist:

P02384, p.1(BCS), SerbianDB playlist for 1-3 June 1993

---

[ R E D A C T E D ]

[REDACTED]

---

**D O S T A N I Ć M i o d r a g**

Names appears on [REDACTED] playlists:

P02586, p.9(ENG), JATD playlist for 01-15 April 1994\*\*  
P02588, p.9(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.5(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

---

**D R Ć A J o v a n ( P 0 2 8 6 0 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.3(ENG), JATD playlist for 16-30 November 1995  
P00829, p.32(ENG), JATD playlist for 01-15 December 1995  
P01155, p.23(ENG), JATD playlist for 16-31 December 1995

---

**D U K I Ć M i l o š ( P 0 2 3 5 9 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.10(ENG), JATD playlist for 16-30 November 1995

---

Annex E.1: Individual SerbianDB Per Diem Payments

P00829, p.2(ENG), JATD playlist for 01-15 December 1995  
P01155, p.2(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

**F I L I P O V I Ć D r a g a n**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.72(ENG), JATD playlist for 16-30 November 1995  
P00829, p.84(ENG), JATD playlist for 01-15 December 1995  
P01155, p.64(ENG), JATD playlist for 16-31 December 1995

---

**G A Ć E Š A V e l j k o ( P 0 2 8 6 1 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.2(ENG), JATD playlist for 16-30 November 1995  
P00829, p.30(ENG), JATD playlist for 01-15 December 1995  
P01155, p.21(ENG), JATD playlist for 16-31 December 1995

---

**G A L O V I Ć N e d e l j k o ( P 0 0 8 5 9 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994  
P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*  
P02583, p.7(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*  
P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.3(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]  
P00828, p.37 (END), JATD playlist for 16-30 November 1995  
P00829, p.15(ENG), JATD playlist for 01-15 December 1995  
P01155, p.15(ENG), JATD playlist for 16-31 December 1995

---

**G A R I Ć V e l j k o**

Name appears on [REDACTED] playlists:

[REDACTED]

Annex E.1: Individual SerbianDB Per Diem Payments

P00828, p.72 (ENG), JATD payroll for 16-30 November 1995  
P00829, p.84(ENG), JATD payroll for 01-15 December 1995  
P01155, p.64(ENG), JATD payroll for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

**G O L U B O V I Ć S r đ a n**

Name appears on [REDACTED] paylists:

[REDACTED]

P00828, p.36(ENG), JATD payroll for 16-30 November 1995

---

**G R U J I Ć D r a g i š a ( P 0 2 7 0 9 )**

Name appears on [REDACTED] paylists:

[REDACTED]

P00840, p.5(ENG), JATD payroll for 01-16 January 1994

[REDACTED]

P02582, p.1(ENG), JATD payroll for 24-31 January 1994\*\*

P02583, p.3(ENG), JATD payroll for 01-28 February 1994\*\*

[REDACTED]

---

[ R E D A C T E D ]

[REDACTED]

---

**I L I Ć A l e k s a n d a r ( P 0 2 8 6 2 )**

Name appears on [REDACTED] paylists:

[REDACTED]

P00828, p.27 (END), JATD payroll for 16-30 November 1995

P00829, p.63(ENG), JATD payroll for 01-15 December 1995

P01155, p.42(ENG), JATD payroll for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

[ R E D A C T E D ]

[REDACTED]

---

Annex E.1: Individual SerbianDB Per Diem Payments

**J A N J A T O V I Ć B o g o s l a v ( P 0 2 7 1 0 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P02384, p.2(BCS), SerbianDB playlist for 1-3 June 1993

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.3(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.72(ENG), JATD playlist for 16-30 November 1995

P00829, p.84(ENG), JATD playlist for 01-15 December 1995

P01155, p.20(ENG), JATD playlist for 16-31 December 1995

---

**J A N K O V I Ć N e b o j š a ( P 0 2 7 1 1 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.47 (END), JATD playlist for 16-30 November 1995

P00829, p.78(ENG), JATD playlist for 01-15 December 1995

---

**J O V A N O V I Ć M i l a n**

Name appears on [REDACTED] playlists:

[REDACTED]

P02586, p.8(ENG), JATD playlist for 01-15 April 1994\*\*

[REDACTED]

---

**J O V A N O V I Ć P r e d r a g ( P 0 2 2 7 3 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.9(ENG), JATD playlist for 01-16 January 1994

---

**J O V A N O V I Ć   Z v e z d a n   ( P 0 2 3 6 0 )**

[REDACTED]

[REDACTED]

[REDACTED]

P02583, p.4(ENG), JATD playlist for 01-28 February 1994\*\*

P02585, p.6(BCS), JATD playlist for 16-31 March 1994\*\*

P02587, p.7(ENG), JATD playlist for 16-30 April 1994\*\*

P02589, p.6, 10(ENG), JATD playlist for 16-31 May 1994

P00828, p.71(ENG), JATD playlist for 16-30 November 1995

P01155, p.5(ENG), JATD playlist for 16-31 December 1995

[REDACTED]

Name appears on [REDACTED] playlists:

[REDACTED]

[REDACTED]

P02583, p.6(ENG), JATD payroll for 01-28 February 1994\*\*

P02585, p.5(BCS), JATD payroll for 16-31 March 1994\*\*

P02587, p.4(ENG), JATD payroll for 16-30 April 1994\*\*

P02589, p.11(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00829, p.5(ENG), JATD payroll for 01-15 December 1995

P01155, p.6(ENG), JATD playlist for 16-31 December 1995

### Annex E.1: Individual SerbianDB Per Diem Payments

**K E S I Ć   J u g o s l a v   ( 1 D 0 0 6 2 9 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.2(ENG), JATD playlist for 16- 30 November 1995

P00829, p.30(ENG), JATD playlist for 01-15 December 1995

P01155, p.21(ENG), JATD playlist for 16- 31 December 1995

[REDACTED]

[REDACTED]

**K R S M A N O V I Ć   D r a g o s l a v   ( P 0 2 3 5 7 )**

Name appears on [REDACTED] playlists as a recipient:

[REDACTED]

P00840, p.6(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.3(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.72(ENG), JATD playlist for 16-30 November 1995

P00829, p.84(ENG), JATD playlist for 01-15 December 1995

P01155, p.64(ENG), JATD playlist for 16-31 December 1995

K R S M A N O V I Ć, V e r a

[REDACTED]

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.69(ENG), JATD playlist for 16-30 November 1995

P00829, p.19(ENG), JATD playlist for 01-15 December 1995

P01155, p.19(ENG), JATD paylist for 16-31 December 1995

K U Š I Ć N j e g o s l a v

Names appears on [REDACTED] playlists:

P02384, p.1(BCS), SerbianDB playlist for 1-3 June 1993



Annex E.1: Individual SerbianDB Per Diem Payments

[REDACTED]

---

**K U Z M A N O V I Ć   Z l a t o m i r   ( 1 D 0 0 6 8 6 / P 0 2 7 1 6 )**

Name appears on [REDACTED] playlists:

P02586, p.9(ENG), JATD playlist for 01-15 April 1994\*\*

P02589, p.5(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.15(ENG), JATD playlist for 16-30 November 1995

P00829, p.9(ENG), JATD playlist for 01-15 December 1995

P01155, p.10(ENG), JATD playlist for 16-31 December 1995

---

**L A Ć E V I Ć   R a n k o   ( P 0 1 9 4 1 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.5(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.1(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.3(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.6(BCS), JATD playlist for 01-15 March 1994\*\*

[REDACTED]

P00828, p.5(ENG), JATD playlist for 16- 30 November 1995

P00829, p.25(ENG), JATD playlist for 01- 15 December 1995

---

**L A Z I Ć   D i m i t r i j e   ( P 0 2 7 1 7 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.1(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.1(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.1(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.1(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.3(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.19(ENG), JATD playlist for 16-30 November 1995

P00829, p.12(ENG), JATD playlist for 01-15 December 1995

P01155, p.13(ENG), JATD playlist for 16-31 December 1995

---

Annex E.1: Individual SerbianDB Per Diem Payments

**L E K A V e l j k o**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.17(ENG), JATD playlist for 16-30 November 1995

P00829, p.11(ENG), JATD playlist for 01-15 December 1995

---

**[ R E D A C T E D ]**

[REDACTED]

---

**L O N Č A R N i k o l a**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.5(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02583, p.3(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.6(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.4(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.2(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.3(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

---

**L U Č I Ć M i r o s l a v ( 1 D 0 0 6 8 7 / P 0 2 8 6 3 )**

Name appears on [REDACTED] playlists:

P02384, p.2(BCS), SerbianDB playlist for 1-3 June 1993

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.9(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.2(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.9(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.5(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.15(ENG), JATD playlist for 16-30 November 1995

P00829, p.9(ENG), JATD playlist for 01-15 December 1995

P01155, p.10(ENG), JATD playlist for 16-31 December 1995

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**MAJSTOROVIĆ Slobodan (P02864)**

Name appears on [REDACTED] playlists

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.5(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.2(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.2(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.71(ENG), JATD playlist for 16 -30 November 1995

P00829, p.22(ENG), JATD playlist for 01-15 December 1995

P01155, p.5(ENG), JATD playlist for 16-31 December 1995

---

**MAKSIMOVIĆ Milan (P02818)**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.10(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.5(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.9(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.10(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.8(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.7(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.1(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.2, 4(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.8(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.72(ENG), JATD playlist for 16-30 November 1995

P00829, p.85(ENG), JATD playlist for 01-15 December 1995

P01155, p.65(ENG), JATD playlist for 16-31 December 1995

---

**MAKSIMOVIĆ Miroslav (2D00323)**

Name appears on [REDACTED] playlists:

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.7(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*

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P02586, p.3(ENG), JATD playlist for 01-15 April 1994\*\*  
P02589, p.2(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]

---

**M A K S I M O V I Ć R a d i š a ( P 0 2 8 1 9 )**

Name appears on [REDACTED] playlists:  
[REDACTED]  
P00840, p.9(ENG), JATD playlist for 01-16 January 1994

---

**M A L I V U K G a v r a ( P 0 2 8 2 1 )**

Name appears on 1 playlist:  
P02384, p.1(BCS), SerbianDB playlist for 1-3 June 1993

---

**M A N D I Ć Ž e l j k o ( 1 D 0 0 6 3 0 / P 0 2 8 6 5 )**

Name appears on [REDACTED] playlists:  
[REDACTED]  
P00828, p.2(ENG), JATD playlist for 16-30 November 1995  
P00829, p.30(ENG), JATD playlist for 01-15 December 1995  
P01155, p.21(ENG), JATD playlist for 16-31 December 1995

---

**[ R E D A C T E D ]**

[REDACTED]

---

**M A T I Ć G o r a n ( P 0 2 8 2 2 )**

Name appears on [REDACTED] playlists:  
[REDACTED]  
P00840, p.7(ENG), JATD playlist for 01-16 January 1994

---

**M E D A K O V I Ć B r a n k o**

(Father of Saša Savica MEDAKOVIĆ, P00208)<sup>3</sup>

Father's name appears on [REDACTED] playlists:  
P02587, p.7(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.7(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.6, 10(ENG), JATD playlist for 16-31 May 1994

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[REDACTED]

---

[ R E D A C T E D ]

[REDACTED]

---

**MIJOVIĆ Vasilje**

Name appears on [REDACTED] playlists:

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.3(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.5(ENG), JATD playlist for 16-30 November 1995

P00829, p.24(ENG), JATD playlist for 01-15 December 1995

P01155, p.5(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

**MILIĆ Božidar (P02866)**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.3(ENG), JATD playlist for 16-30 November 1995

P00829, p.32(ENG), JATD playlist for 01-15 December 1995

P01155, p.23(ENG), JATD playlist for 16-31 December 1995

---

**MILIĆ Miko (P02824)**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.9(ENG), JATD playlist for 01-16 January 1994

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<sup>3</sup> Radmila MEDAKOVIĆ's name, the mother of Saša MEDAKOVIĆ, appears on [REDACTED] playlists (listed as Rada MEDAKOVIĆ): [REDACTED] P00828, p.69(ENG); P00829, p.19(ENG); P01155, p.19(ENG).



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P00828, p.3(ENG), JATD playlist for 16-30 November (1995)  
P00829, p.31(ENG), JATD playlist for 1-15 December (1995)  
P01155, p.23(ENG), JATD playlist 16-31 December (1995)

---

### **M I R K O V I Ć M i r o s l a v ( P 0 2 5 7 0 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.1, 3(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.1(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.3(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.6(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.4(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.5(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.3(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.1(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.7(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.10(ENG), JATD playlist for 16-30 November 1995

P00829, p.2(ENG), JATD playlist for 01-15 December 1995

P01155, p.2(ENG), JATD playlist for 16-31 December 1995

---

### **M O M Ć I L O V I Ć D u š a n ( P 0 0 1 6 0 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.71(ENG), JATD playlist for 16-30 November 1995

P00829, p.22(ENG), JATD playlist for 1-15 December (1995)

P01155, p.5(ENG), JATD playlist for 16-31 December (1995)

---

### **M U N I K R A V I Ć D u š a n**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.3(ENG), JATD playlist for 16-30 November (1995)

P00829, p.31(ENG), JATD playlist for 1-15 December (1995)

P01155, p.23(ENG), JATD playlist 16-31 December (1995)

---

### **M U N I K R A V I Ć M i l o r a d**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.2(ENG), JATD playlist for 16-30 November (1995)

P00829, p.31(ENG), JATD playlist for 1-15 December (1995)

---

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P01155, p.22(ENG), JATD playlist 16-31 December (1995)

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**O B R A D O V I Ć   T i n a**

(Wife of Ljubomir OBRADOVIĆ, 1D00093)

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.69(ENG), JATD playlist for 16-30 November 1995

P00829, p.19(ENG), JATD playlist for 01-15 December 1995

P01155, p.19(ENG), JATD playlist for 16-31 December 1995

---

**O B R E N O V I Ć   Z o r a n   ( P 0 2 8 2 7 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.9(ENG), JATD playlist for 01-16 January 1994

---

**O L U I Ć   D r a g a n   ( P 0 0 2 6 1 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P02384, p.2(BCS), SerbianDB playlist for 1-3 June 1993

[REDACTED]

P00840, p.2(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.3(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.5(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.5(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.11(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.4(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.5(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.3(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00544, p.70(ENG), JATD playlist for 1-16 November 1995

P00828, p.71(ENG), JATD playlist for 16-30 November 1995

P00829, p.22(ENG) JATD playlist for 1-15 December 1995

P01155, p.5(ENG), JATD playlist for 16-31 December 1995

---

**O P A Č I Ć   G o r a n   ( P 0 1 9 7 2 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.2(ENG), JATD playlist for 16-30 November 1995



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P00829, p.30(ENG), JATD playlist for 01-15 December 1995  
P01155, p.21(ENG), JATD playlist for 16-31 December 1995

---

**O P A Č I Ć M i l o š ( P 0 2 3 6 1 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.2(ENG), JATD playlist for 16-30 November 1995  
P00829, p.30(ENG), JATD playlist for 01-15 December 1995  
P01155, p.21(ENG), JATD playlist for 16-31 December 1995

---

**O R E Š Ć A N I N S t o j a n**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.38(ENG), JATD playlist for 16-30 November 1995  
P00829, p.16(ENG), JATD playlist for 01-15 December 1995  
P01155, p.18(ENG), JATD playlist for 16-31 December 1995

---

**[ R E D A C T E D ]**

[REDACTED]

---

**[ R E D A C T E D ]**

[REDACTED]

---

**P A J I Ć S r e t e n ( P 0 2 8 2 9 )**

Name appears on [REDACTED] playlists:

P02586, p.3(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.5(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.2(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.2(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]

P00828, p.19(ENG), JATD playlist for 16-30 November 1995  
P00829, p.12(ENG), JATD playlist for 01-15 December 1995  
P01155, p.13(ENG), JATD playlist for 16-31 December 1995

---

**[ R E D A C T E D ]**

[REDACTED]

---

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**P E R K O V I Ć D r a g o**

Name appears on [REDACTED] playlists:

P02586, p.9(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.2(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.9(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.5(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

---

**P E T K O V I Ć N o v i c a ( P 0 2 8 3 2 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.9(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

---

**P E T R A K O V I Ć M i ć o ( P 0 2 3 5 8 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.11(ENG), JATD playlist for 16-30 November 1995

P00829, p.3(ENG), JATD playlist for 01-15 December 1995

P01155, p.4(ENG), JATD playlist for 16-31 December 1995

---

**P E T R O V I Ć D r a g a n**

Name appears on [REDACTED] playlists:

[REDACTED]

P00828, p.70(ENG), JATD playlist for 16-30 November 1995

P00829, p.47(ENG), JATD playlist for 01-15 December 1995

---

**P I L I P O V I Ć N i k o l a**

Name appears on [REDACTED] playlists:

[REDACTED]

P02384, p.1(BCS), SerbianDB playlist for 1-3 June 1993

[REDACTED]

P00840, p.11(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.7(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.10(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.9(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.9(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.3(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.5(ENG), JATD playlist for 16-30 April 1994\*\*

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P02588, p.2(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.2(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]

---

[ R E D A C T E D ]

[REDACTED]

---

**P O P O V I Ć M i l e n k o ( P 0 0 5 0 0 )**

Name appears on [REDACTED] playlists:  
[REDACTED]  
P02384, p.1(BCS), SerbianDB playlist for 1-3 June 1993  
[REDACTED]  
P00840, p.5(ENG), JATD playlist for 01-16 January 1994  
[REDACTED]  
P02582, p.1(ENG), JATD playlist for 24-31 January 1994\*\*  
P02583, p.3(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.6(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.4(BCS), JATD playlist for 16-31 March 1994\*\*  
P02586, p.5(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.3(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.1(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.4(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]

---

**P O P O V I Ć M i o m i r ( P 0 2 8 3 4 )**

Name appears on [REDACTED] playlists  
[REDACTED]  
P00840, p.1(ENG), JATD playlist for 01-16 January 1994  
[REDACTED]  
P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*  
P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*  
[REDACTED]  
P00828, p.72(ENG), JATD playlist for 16-30 November 1995  
P00829, p.84(ENG), JATD playlist for 01-15 December 1995  
P01155, p.20(ENG), JATD playlist for 16-31 December 1995

---

**P R I C A P r e d r a g ( P 0 2 6 0 0 )**

Name appears on [REDACTED] playlists:  
[REDACTED]  
P02384, p.2(BCS), SerbianDB playlist for 1-3 June 1993

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[REDACTED]

P00840, p.2(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.3(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.5(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.5(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.11(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.4(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.5(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.3(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.41(ENG), JATD playlist for 16-30 November 1995

P00829, p.34(ENG), JATD playlist for 01-15 December 1995

P01155, p.5(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

**P U P O V A C N i k o l a ( P 0 0 2 6 5 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.11(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.7(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.10(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.9(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.9(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.3(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.5(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.2(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.2(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

---

**R A D I V O J E V I Ć M i l u t i n ( P 0 0 8 5 5 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.4(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.2(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.2(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.3(BCS), JATD playlist for 16-31 March 1994\*\*

Annex E.1: Individual SerbianDB Per Diem Payments

P02586, p.10(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.8(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.8(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.12(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]  
P00828, p.14(ENG), JATD playlist for 16-30 November 1995  
P00829, p.6(ENG), JATD playlist for 01-15 December 1995  
P01155, p.8(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

**R A D O N J I Ć M i l a n ( 1 D 0 0 7 1 5 / P 0 2 2 9 7 / P 0 2 5 6 8 )**

Name appears on [REDACTED] playlists:

[REDACTED]  
P00840, p.6(ENG), JATD playlist for 01-16 January 1994  
[REDACTED]  
P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*  
P02583, p.5(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*  
P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.3(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]  
P00828, p.72(ENG), JATD playlist for 16-30 November 1995  
P00829, p.84(ENG), JATD playlist for 01-15 December 1995  
P01155, p.64(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

**R A I Ć Z o r a n ( P 0 0 2 3 3 , P 0 0 2 3 4 )**

Name appears on [REDACTED] playlists:

[REDACTED]  
P02384, p.2(BCS), SerbianDB playlist for 1-3 June 1993  
[REDACTED]  
P00840, p.1(ENG), JATD playlist for 01-16 January 1994  
[REDACTED]  
P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

### Annex E.1: Individual SerbianDB Per Diem Payments

P02583, p.1(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*  
P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.3(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]  
P00828, p.72(ENG), JATD playlist for 16-30 November 1995  
P00829, p.84(ENG), JATD playlist for 01-15 December 1995  
P01155, p.64(ENG), JATD playlist for 16-31 December 1995

[ R E D A C T E D ]

[REDACTED]

**R A Š K O V I Ć   R a d o m i r   ( P 0 0 2 6 6 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.11(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.7(ENG), JATD payroll for 24-31 January 1994\*\*

P02583, p.10(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.9(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.9(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.3(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.5(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.2(BCS), JATD paylist for 01-15 May 1994\*\*

P02589, p.2(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

[ R E D A C T E D ]

[REDACTED]

RISTOVIĆ Zoran

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

Annex E.1: Individual SerbianDB Per Diem Payments

[ R E D A C T E D ]

[REDACTED]

---

**Š A R E N e n a d ( P 0 2 9 7 0 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.3(ENG), JATD playlist for 16-30 November 1995

P00829, p.31(ENG), JATD playlist for 01-15 December 1995

P01155, p.23(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

**S I M I Ć N i k o l a ( P 0 2 8 7 1 )**

Name appears on [REDACTED] *Poskok* playlists:

[REDACTED]

P00828, p.2(ENG), JATD playlist for 16-30 November 1995

P00829, p.30(ENG), JATD playlist for 01-15 December 1995

P01155, p.21(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

[ R E D A C T E D ]

[REDACTED]

---

**S T A K I Ć S l o b o d a n ( P 0 2 5 9 1 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.2(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.3(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.6(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.5(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.5(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.11(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.4(ENG), JATD playlist for 16-30 April 1994\*\*

### Annex E.1: Individual SerbianDB Per Diem Payments

P02588, p.5(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.11(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]  
P00828, p.12(ENG), JATD playlist for 16-30 November 1995  
P00829, p.5(ENG), JATD playlist for 01-15 December 1995  
P01155, p.6(BCS), JATD playlist for 16-31 December 1995

**STANOJEVIĆ Dragutin (P02569)**

Name appears on [REDACTED] playlists:  
 [REDACTED]  
 P00840, p.5(ENG), JATD playlist for 01-16 January 1994  
 [REDACTED]  
 P02582, p.1(ENG), JATD playlist for 24-31 January 1994\*\*  
 P02583, p.3(ENG), JATD playlist for 01-28 February 1994\*\*  
 P02584, p.6(BCS), JATD playlist for 01-15 March 1994\*\*  
 P02585, p.4(BCS), JATD playlist for 16-31 March 1994\*\*  
 P02586, p.5(ENG), JATD playlist for 01-15 April 1994\*\*  
 P02587, p.3(ENG), JATD playlist for 16-30 April 1994\*\*  
 P02588, p.1(BCS), JATD playlist for 01-15 May 1994\*\*  
 P02589, p.7(ENG), JATD playlist for 16-31 May 1994  
 [REDACTED]  
 P00828, p.11(ENG), JATD playlist for 16-30 November 1995  
 P00829, p.3(ENG), JATD playlist for 01-15 December 1995

[ R E D A C T E D ]

[REDACTED]

[ R E D A C T E D ]

[REDACTED]

**STOPARIĆ Goran**

Name appears on [REDACTED] playlists:  
[REDACTED]  
P00828, p.44(ENG), JATD playlist for 16-30 November 1995  
P00829, p.52(ENG), JATD playlist for 01-15 December 1995

**S U B O T I Ć   D a v o r**

Name appears on [REDACTED] playlists:  
[REDACTED]



## Annex E.1: Individual SerbianDB Per Diem Payments

P02384, p.2(BCS), SerbianDB playlist for 1-3 June 1993  
[REDACTED]  
P00840, p.5(ENG), JATD playlist for 01-16 January 1994  
[REDACTED]  
P02582, p.1(ENG), JATD playlist for 24-31 January 1994\*\*  
P02583, p.3(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.6(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.4(BCS), JATD playlist for 16-31 March 1994\*\*  
P02586, p.5(ENG), JATD playlist for 01-15 April 1994\*\*  
[REDACTED]  
P00828, p.70(ENG), JATD playlist for 16-30 November 1995  
P00829, p.20(ENG), JATD playlist for 01-15 December 1995  
P01155, p.5(ENG), JATD playlist for 16-31 December 1995

---

### S U V A R A D r a š k o ( P 0 2 5 9 0 )

Name appears on [REDACTED] playlists:  
[REDACTED]  
P00840, p.2(ENG), JATD playlist for 01-16 January 1994  
[REDACTED]  
P02582, p.3(ENG), JATD playlist for 24-31 January 1994\*\*  
P02583, p.6(ENG), JATD playlist for 01-28 February 1994\*\*  
P02584, p.5(BCS), JATD playlist for 01-15 March 1994\*\*  
P02585, p.5(BCS), JATD playlist for 16-31 March 1994\*\*  
P02586, p.11(ENG), JATD playlist for 01-15 April 1994\*\*  
P02587, p.4(ENG), JATD playlist for 16-30 April 1994\*\*  
P02588, p.5(BCS), JATD playlist for 01-15 May 1994\*\*  
P02589, p.11(ENG), JATD playlist for 16-31 May 1994  
[REDACTED]  
P00828, p.12(ENG), JATD playlist for 16-30 November 1995  
P00829, p.5(ENG), JATD playlist for 01-15 December 1995  
P01155, p.6(ENG), JATD playlist for 16-31 December 1995

---

[ R E D A C T E D ]

[REDACTED]

---

### T E O F A N O V I Ć S t o j a n k a

(Wife of Žarko TEOFANOVIĆ, P02842)

Name appears on [REDACTED] playlists:  
[REDACTED]  
P00828, p.69(ENG), JATD playlist for 16-30 November 1995  
P00829, p.19(ENG), JATD playlist for 01-15 December 1995  
P01155, p.19(ENG), JATD playlist for 16-31 December 1995

---

**T O D O R O V I Ć   G o r g i n a   ( P 0 2 8 4 3 )**

[REDACTED]

P00840, p.9(ENG), JATD playlist for 01-16 January 1994

P00840, p.9(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Annex E.1: Individual SerbianDB Per Diem Payments

**Z E Č E V I Ć B u d i m i r ( P 0 2 8 5 2 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P02384, p.1(BCS), SerbianDB playlist for 1-3 June 1993

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P00828, p.5(ENG), JATD playlist for 16-30 November 1995

P00829, p.24(ENG), JATD playlist for 01-15 December 1995

---

**Z E L I Ć M i l o r a d ( P 0 2 8 7 2 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.1(ENG), JATD playlist for 01-16 January 1994

[REDACTED]

P02582, p.4(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.7(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.3(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.2(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.4(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.9(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.3(BCS), JATD playlist for 01-15 May 1994\*\*

P02589, p.7(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.37(ENG), JATD playlist for 16-30 November 1995

P00829, p.15(ENG), JATD playlist for 01-15 December 1995

P01155, p.15(ENG), JATD playlist for 16-31 December 1995

---

**Ž I V A N O V I Ć Z d r a v k o ( P 0 2 8 5 3 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.9(ENG), JATD playlist for 01-16 January 1994

---

[ R E D A C T E D ]

[REDACTED]

---

**Z V I Z D I Ć D r a g o j e ( P 0 2 3 6 2 )**

Name appears on [REDACTED] playlists:

[REDACTED]

P00840, p.3(ENG), JATD playlist for 01-16 January 1994

### Annex E.1: Individual SerbianDB Per Diem Payments

[REDACTED]

P02582, p.2(ENG), JATD playlist for 24-31 January 1994\*\*

P02583, p.4(ENG), JATD playlist for 01-28 February 1994\*\*

P02584, p.8(BCS), JATD playlist for 01-15 March 1994\*\*

P02585, p.6(BCS), JATD playlist for 16-31 March 1994\*\*

P02586, p.5(ENG), JATD playlist for 01-15 April 1994\*\*

P02587, p.3(ENG), JATD playlist for 16-30 April 1994\*\*

P02588, p.1(BCS), JATD payroll for 01-15 May 1994\*\*

P02589, p.7(ENG), JATD playlist for 16-31 May 1994

[REDACTED]

P00828, p.10(ENG), JATD playlist for 16-30 November 1995

P00829, p.2(ENG), JATD playlist for 01-15 December 1995

P01155, p.2(ENG), JATD playlist for 16-31 December 1995

***PUBLIC REDACTED VERSION***

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**ANNEX E.2**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**SerbianDB PER DIEM PAYMENTS TO SDG MEMBERS**

This Annex provides a non-comprehensive overview of payments made by the SerbianDB between [REDACTED] and 31 December 1995 to individuals whose membership in the SDG was confirmed by witnesses and/or documentary evidence.

[REDACTED]

***PUBLIC REDACTED VERSION***

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**ANNEX E.3**

**TO PROSECUTION FINAL TRIAL BRIEF**

---

**[REDACTED]**

***PUBLIC REDACTED VERSION***

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**ANNEX E.4**

**TO PROSECUTION FINAL TRIAL BRIEF**

---

**SerbianDB PER DIEM PAYMENTS TO  
RELATIVES OF DECEASED UNIT MEMBERS**



## Annex E.4: SerbianDB Per Diem Payments to Relatives of Deceased Unit Members

This Annex provides a list of SerbianDB per diem payments to relatives of deceased Unit members, specifically:

- Živko BAKLAJIĆ, father of Predrag BAKLAJIĆ;<sup>1</sup>
- Branko and Rada MEDAKOVIĆ, parents of Saša MEDAKOVIĆ;<sup>2</sup>
- Branko and Slavka DIMIĆ, parents of Milan DIMIĆ;<sup>3</sup>
- Tina OBRADOVIĆ, wife of Ljubomir OBRADOVIĆ;<sup>4</sup>
- Stojanka TEOFANOVIĆ, wife of Žarko TEOFANOVIĆ<sup>5</sup>
- Vera KRSMANOVIĆ, [REDACTED].<sup>6</sup>

[REDACTED]

P00840, p.3(ENG)(playlist for 01 to 16 January 1994) (DIMIĆ Branko, DIMIĆ Slavka, BAKLAJIĆ Živko)

P02582, p.2(ENG)(playlist for 24 to 31 January 1994\*\*)(BAKLJAJIĆ/sic/ Živko, DIMIĆ Branko, DIMIĆ Slavka)

P02583, p.4(ENG)(playlist for 01 to 28 February 1994\*\*)(DIMIĆ Branko, DIMIĆ Slavka, BAKLAJIĆ Živko)

P02584, p.4(BCS)(paylist for 01 to 15 March 1994\*\*)(DIMIĆ Branko, DIMIĆ Slavka, BAKLAJIĆ Živko)

P02585, p.6(BCS)(paylist for 16 to 31 March 1994\*\*)(DIMIĆ Branko, DIMIĆ Slavka, BAKLAJIĆ Živko)

P02586, p.2(ENG)(playlist for 01 to 15 April 1994\*\*)(DIMIĆ Savka/sic/, DIMIĆ Branko, BAKLAJIĆ Živko)

P02587, p.7(ENG)(playlist for 16 to 30 April 1994\*\*)(BAKLJIĆ Živko, DIMIĆ Savka/sic/, DIMIĆ Branko, MEDAKOVIĆ Branko)

P02588, p.7(BCS)(playlist for 01 to 15 May 1994\*\*)(BAKLJIĆ Živko, DIMIĆ Branko, DIMIĆ Slavka, MEDAKOVIĆ Branko)

P02589, p.6(ENG)(paylist for 16 to 31 May 1994)(DIMIĆ Branko, DIMIĆ Savka/sic/, BEKLAJIĆ /sic/ Živko, NEDAKOVIĆ/sic/ Branko)

<sup>1</sup> P00839, p.2,3,6.

<sup>2</sup> P00208, p.2-3.

<sup>3</sup> P02706, p.1.

<sup>4</sup> 1D00093, p.4.

<sup>5</sup> P02842, p.1.

<sup>6</sup> [REDACTED].

Annex E.4: SerbianDB Per Diem Payments to Relatives of Deceased Unit Members

[REDACTED]

P00828, p.69(ENG)(paylist for 16 to 30 November 1995)(VUKLAJIĆ Živko, DIMIĆ Branko, TEOFANOVIĆ Stojanka, OBRADOVIĆ Tina, KRSMANOVIĆ Vera, MEDAKOVIĆ Rada)

P00829, p.19(ENG)(paylist for 01 to 15 December 1995)(BAKLAJIĆ Živko, DIMIĆ Branko, TEOFANOVIĆ Stojanka, OBRADOVIĆ Tina, KRSMANOVIĆ Vera, MEDAKOVIĆ Rada)

P01155, p.19(ENG)(paylist for 16 to 31 December 1995)(BAKLAJIĆ Živko, DIMIĆ Branko, TEOFANOVIĆ Stojanka, OBRADOVIĆ Tina, KRSMANOVIĆ Vera, MEDAKOVIĆ Rada)

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**ANNEX E.5**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**PAYLISTS SIGNED BY SIMATOVIĆ**

Annex E.5: Playlists signed by Simatović

**S I M A T O V I Ć F r a n k o ( P 0 0 8 3 1 )**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

P00828, p.1(BCS), JATD playlist for 16-30 November 1995 (Simatović signed the cover page)

P01155, p.1(BCS), JATD playlist for 16-31 December 1995(Simatović initialled the cover page)

**UNITED NATIONS**

**INTERNATIONAL RESIDUAL MECHANISM FOR CRIMINAL TRIBUNALS**

**Case No. MICT-15-96-T**

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ &  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION***

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**ANNEX F**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**HANDWRITTEN MARKINGS AND SIGNATURES ON SerbianDB DOCUMENTS**

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Marking	Exhibit	Explanation and source
	P03818(BCS)	NRDB <i>Načelnik resora bezbednosti</i> Chief of the RDB <sup>1</sup>
[REDACTED]	[REDACTED]	[REDACTED] <sup>2</sup>
[REDACTED]	[REDACTED]	[REDACTED] <sup>3</sup>
[REDACTED]	[REDACTED]	[REDACTED]. <sup>4</sup>
	2D00143, p.1(BCS)	ZNRDB <i>Zamenik načelnika RDB</i> Deputy Head of the RDB <sup>5</sup>
	P00860, p.1(BCS)	ZNRDB circled: <i>Zamenik načelnika RDB</i> Deputy Head of the RDB was made aware of it; he familiarised himself with it. <sup>6</sup>

<sup>1</sup> DRAČAAco:T.35-36(3-Dec-2019).

<sup>2</sup> [REDACTED].

<sup>3</sup> [REDACTED].

<sup>4</sup> [REDACTED]; [REDACTED].

<sup>5</sup> [REDACTED].

<sup>6</sup> [REDACTED].

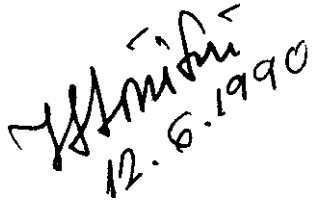
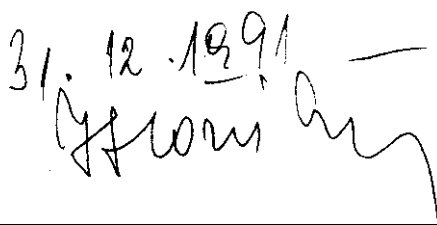
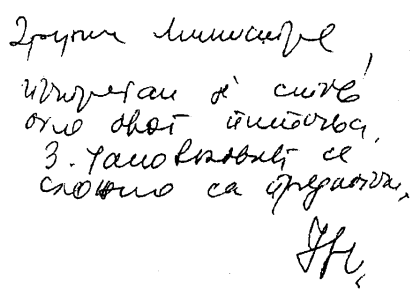
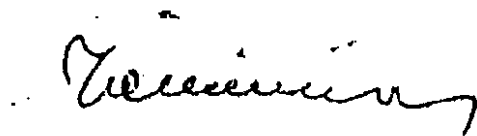
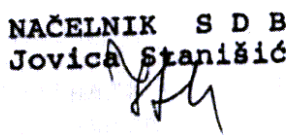


Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Marking	Exhibit	Explanation and source
[REDACTED]	[REDACTED]	[REDACTED] <sup>7</sup>

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<sup>7</sup> [REDACTED].  
 MICT-15-96-T  
*Public Redacted Version Annex F*

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Exhibit	Year	Signature
<b>JOVICA STANIŠIĆ</b>		
P02840, p.77(BCS)	1990	
P02840, p.82(BCS)	1991	
P00242, p.1(BCS) <sup>8</sup>	1991	
P00242, p.5(BCS) <sup>9</sup>	1991	
P02875, p.7(BCS)	1992	
P00845, p.2(BCS)	1992	
1D00715, p.53(BCS) <sup>10</sup>	1992	

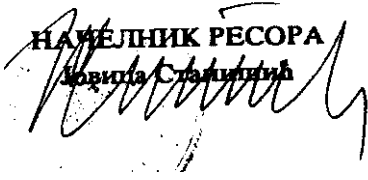

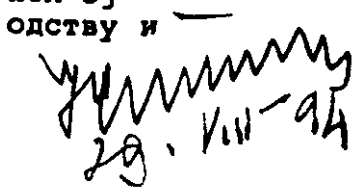
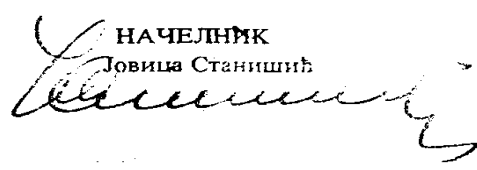
<sup>8</sup> MIĆIĆRadivoje:T.22(3-Mar-2020); NIELSENChristian:T.66-67(14-Nov-2017).

<sup>9</sup> MIĆIĆRadivoje:T.24(3-Mar-2020); MIĆIĆRadivoje:T.6(4-Mar-2020).

<sup>10</sup> NIELSENChristian:T.47-48(14-Nov-2017).

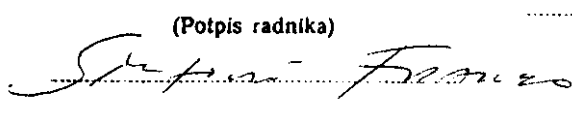

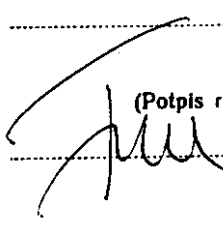
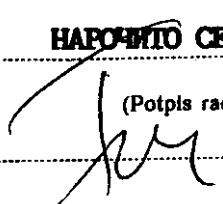
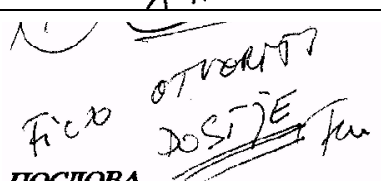


Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Exhibit	Year	Signature
P00831, p.54(BCS)	1993	
P02567, p.1(BCS)	1994	
P02840, p.84(BCS)	1994	
[REDACTED] <sup>11</sup>	1994	[REDACTED]
P00831, p.56(BCS)	1995	

<sup>11</sup> NIELSENChristian:T.3(15-Nov-2017).  
 МІСТ-15-96-Т  
 Public Redacted Version Annex F

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

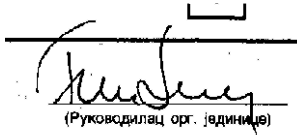
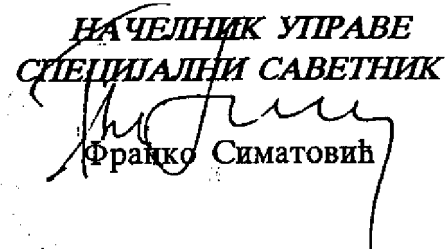
Exhibit	Year	Signature
<b>FRANKO SIMATOVIĆ</b>		
P00831, p.115(BCS)	1990	<p>(Potpis radnika)</p> 
P00831, p.49(BCS)	1991	<p>02-91 Tucuo</p>
P00843(BCS) <sup>12</sup>	1991 <sup>13</sup>	
P00831, p.121(BCS)	1993	<p>HAPOBHTO CE HCCTHME</p> <p>(Potpis radnika)</p>  <p>(Potpis radnika)</p> 
P00831, p.54(BCS)	1993	<p>Franko Simatović</p> <p>01.05.93</p>
P00860, p.1(BCS) <sup>14</sup>	1994	<p>FIKO OTVORITI DOSTIJE</p> <p>ПОПИСАНО</p> 

<sup>12</sup> NIELSENChristian:T.45(15-Nov-2017).

<sup>13</sup> NIELSENChristian:T.45(15-Nov-2017).

<sup>14</sup> [REDACTED].

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

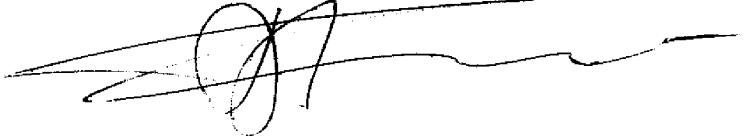
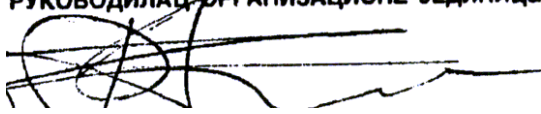
Exhibit	Year	Signature
P02297, p.1(BCS)/1D00715, p.2(BCS) <sup>15</sup>	1994 or 1995 <sup>16</sup>	 (Руководилац орг. јединице)
[REDACTED] <sup>17</sup>	1995	[REDACTED]
P02974(BCS)	1995	<p><b>НАЧЕЛНИК УПРАВЕ</b>  <b>СПЕЦИЈАЛНИ САВЕТНИК</b></p>  Франко Симатовић

<sup>15</sup> KRSMANOVIĆDragoslav:T.4(3-Oct-2019); NIELSENChristian:T.44(14-Nov-2017).

<sup>16</sup> KRSMANOVIĆDragoslav:T.4(3-Oct-2019).

<sup>17</sup> [REDACTED].

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

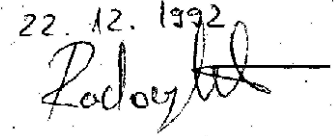
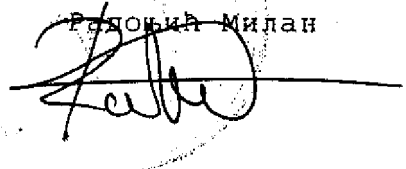
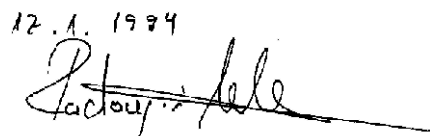
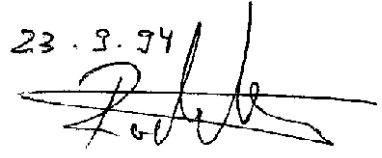
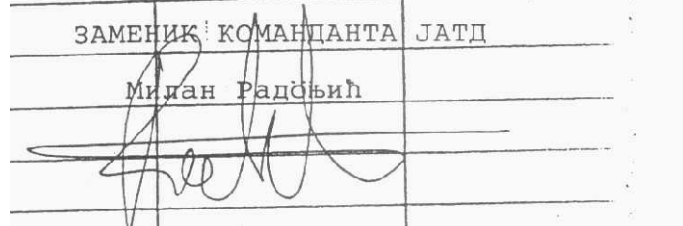
Exhibit	Year	Signature
<b>DRAGAN FILIPOVIĆ</b>		
[REDACTED]	1991	[REDACTED]
[REDACTED]	1992	[REDACTED]
[REDACTED]	1993	[REDACTED]
P00860, p.2(BCS) <sup>18</sup>	1994	<p><b>Драган Филиповић</b></p> 
[REDACTED] <sup>19</sup>	1994	[REDACTED]
[REDACTED]	1995	[REDACTED]
2D00459, p.4(BCS) <sup>20</sup>	1997	<p><b>РУКОВОДИЛАЦ ОРГАНИЗАЦИОНЕ ЈЕДИНИЦЕ</b></p> 
[REDACTED]	2003	[REDACTED]

<sup>18</sup> [REDACTED].

<sup>19</sup> NIELSENChristian:T.3(15-Nov-2017).

<sup>20</sup> [REDACTED].

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

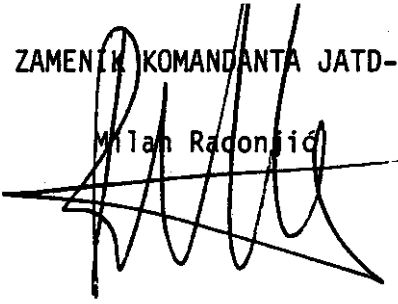
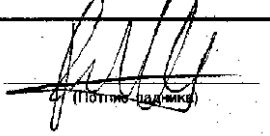

Exhibit	Year	Signature
<b>MILAN RADONJIĆ</b>		
1D00715, p.52(BCS)	1992	
P02569, p.18(BCS)	1993	
[REDACTED] <sup>21</sup>	1993	[REDACTED]
1D00715, p.4(BCS)	1994	
1D00715, p.5(BCS)	1994	
P02584, p.1(BCS) <sup>22</sup>	1994	
[REDACTED] <sup>23</sup>	1995	[REDACTED]

<sup>21</sup> [REDACTED].

<sup>22</sup> [REDACTED].

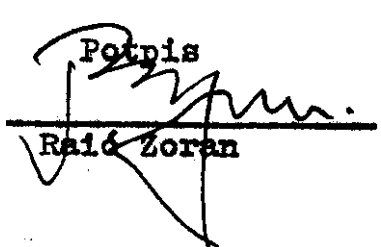
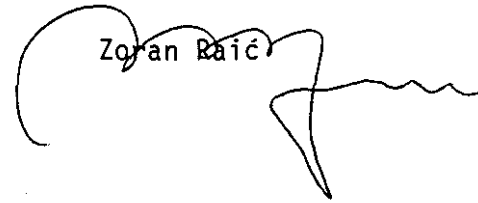
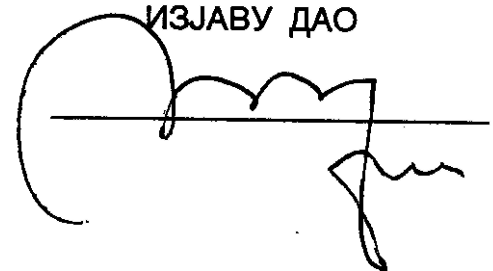
<sup>23</sup> [REDACTED].

Annex F: Handwritten Markings and Signatures on SerbianDB Documents


Exhibit	Year	Signature
P00234, p.25(BCS)	1995	<p>ZAMENIK KOMANDANTA JATD-a</p> <p>Milan Radonjic</p> 
1D00715, p.2(BCS)	1994 or 1995 <sup>24</sup>	<p>КОНАЧНА ОЦЕНА ЗАПОСЛЕНИОГ</p>  <p>24 (Потпис - раднички)</p>
1D00715, p.46(BCS)	1996	<p>1996</p> 

<sup>24</sup> KRSMANOVIĆDragoslav:T.4(3-Oct-2019).

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Exhibit	Year	Signature
<b>ZORAN RAIĆ</b>		
P00234, p.13(BCS)	1992	
P01972, p.2(BCS)	1996	
P00234, p.9(BCS)	1997	

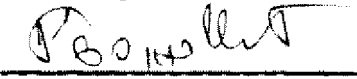

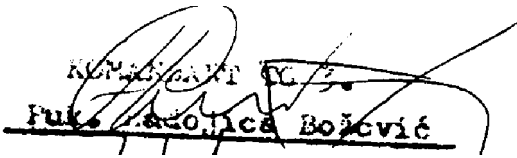
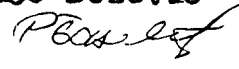
Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Exhibit	Year	Signature
<b>ŽIVOJIN IVANOVIĆ</b>		
P00260, p.4(BCS)	1991	<p>Командир јединице</p> <p><u>Иванко Живочин</u></p>
P00260, p.18(BCS)	1991	<p><u>Иванко Живочин</u></p> <p>(Živojin Ivanović)</p>
P00263, p.7(BCS)	1991	<p>ПРИМО</p> <p><u>Иванко Живочин</u></p>
P03780, p.4(BCS)	1991	 <p><u>Иванко Живочин</u></p>
P01951(BCS)	1992	<p>K O M A N D A N T</p> <p>Ivanović Živojin</p> <p><u>Иванко Живочин</u></p>
P02725, p.14(BCS) <sup>25</sup>	1992	<p>КОМАНДАНТ ЈЕДИНИЦЕ</p> <p>Ivanović Živojin</p> <p><u>Иванко Живочин</u></p>

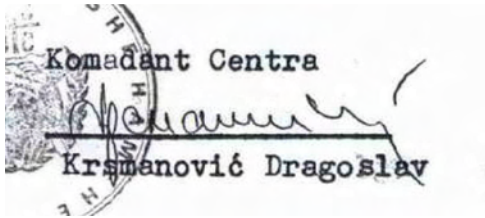
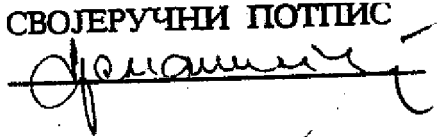
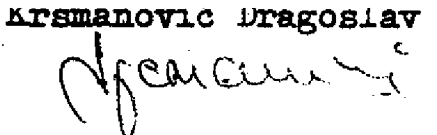
<sup>25</sup> KRSMANOVIĆDragoslav:T.43-44(2-Oct-2019).



Annex F: Handwritten Markings and Signatures on SerbianDB Documents

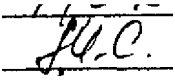
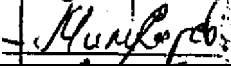
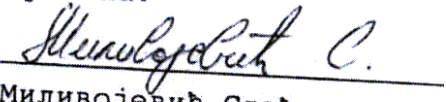
Exhibit	Year	Signature
<b>RADOJICA BOŽOVIĆ</b>		
P00260, p.4(BCS)	1991	вођа пута 
[REDACTED]	1992	[REDACTED]
1D00093, p.15(BCS)	1993	 <b>BOŽOVIĆ RADOJICA</b>
2D00219(BCS)	1994	 <b>Radojica Božović</b>
P03751(BCS)	1995	<b>Radojica Božović - KOBAC</b> 
[REDACTED]	1998	[REDACTED]

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Exhibit	Year	Signature
<b>DRAGOSLAV KRSMANOVIĆ</b>		
P00553, p.34(BCS)	1993	
P02357, p. 51(BCS)	1994	
P02357, p. 41(BCS)	1994	
[REDACTED] <sup>26</sup>	1995	[REDACTED]

<sup>26</sup> KRSMANOVIĆDragoslav:T.27(2-Oct-2019).  
 MICT-15-96-T

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

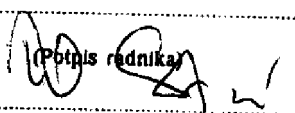
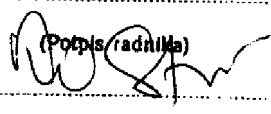
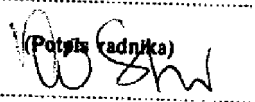
Exhibit	Year	Signature
<b>SLADANA MILIVOJEVIĆ</b> (Secretary to SIMATOVIĆ) <sup>27</sup>		
[REDACTED]	1993	
P02588, p.3(BCS)	1994	
[REDACTED]	N/A	 Миливојевић Слађана
[REDACTED]	[REDACTED]	[REDACTED]

<sup>27</sup> [REDACTED] [REDACTED].

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Exhibit	Year	Signature
<b>MILAN TEPAVČEVIĆ</b>		
P00209(BCS)	1990	
P02453(BCS)	1991	MILAN TEPAVČEVIĆ 
P03250(BCS)	1992	
P03252(BCS)	1992	

Annex F: Handwritten Markings and Signatures on SerbianDB Documents

Exhibit	Year	Signature
<b>RADOSLAV KOSTIĆ</b>		
P00522, p.18(BCS)	1990	Nostic Radoslav 06.12.1990.
[REDACTED]	1991	[REDACTED]
[REDACTED]	1991	[REDACTED]
P00522, p.20(BCS)	1991	15.5.1991. Nostic Radoslav
P00522, p.23(BCS)	1991	PRIMIO 29.6.91 Nostic
P00522, p.25(BCS)	1992	Primio: 14.12.1992. Nostic Radoslav
[REDACTED]	1992	[REDACTED]
P00522, p.54(BCS)	1992	(Potpis radnika) 
P00522, p.56(BCS)	1993	(Potpis radnika) 
P00522, p.58(BCS)	1994	(Potpis radnika) 

**UNITED NATIONS**

**INTERNATIONAL RESIDUAL MECHANISM FOR CRIMINAL TRIBUNALS**

**Case No. MICT-15-96-T**

**THE PROSECUTOR**

**v.**

**JOVICA STANIŠIĆ &  
FRANKO SIMATOVIĆ**

***PUBLIC REDACTED VERSION***

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**ANNEX G**

**TO PROSECUTION FINAL TRIAL BRIEF**

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**ABBREVIATIONS AND AUTHORITIES**

## List of Abbreviations and Authorities (Glossary)

Abbreviation used	Full citation
<b>ABiH</b>	Army of the Republic of Bosnia and Herzegovina
<b>ARK</b>	Autonomous Region of Krajina (in Bosnia and Herzegovina)
<b>BiH</b>	Bosnia and Herzegovina
<b>CCP</b>	Common Criminal Purpose
<b>CGP</b>	Contact Group Peace Plan
<b>CRDB</b>	RDB Centre
<b>Croatian-MUP</b>	Croatian Ministry of Interior
<b>CSB</b>	Security Services Centre
<b>EC</b>	European Community
<b>ECMM</b>	European Community Monitor Mission
<b>FederalDB</b>	State Security Service of the FSUP (of SFRY or FRY)
<b>FRY</b>	Federal Republic of Yugoslavia
<b>FSUP</b>	Federal Secretariat/Ministry of Internal Affairs (of SFRY or FRY)
<b>HDZ</b>	Croatian Democratic Community
<b>ICTY Trial</b>	<i>Prosecutor v. Stanišić and Simatović</i> , Case No.IT-03-69-T
<b>IKM</b>	Forward Command Post
<b>JATD</b>	Unit for Anti-Terrorist Activities (SMUP-DB)
<b>JCE</b>	Joint Criminal Enterprise
<b>JNA</b>	Yugoslav People's Army (ceased to exist in May 1992 when it was divided into the VJ and VRS)
<b>JPN</b>	Special Purpose Unit (SerbianDB)
<b>JSO</b>	Unit for Special Operations (SerbianDB)
<b>KDF</b>	Captain Dragan Fund
<b>KOG</b>	Counter-Intelligence Group (JNA)
<b>KOS</b>	Counter-Intelligence Service (JNA)
<b>Matica</b>	Association of Serb Émigrés
<b>MOD</b>	Ministry of Defence

List of Abbreviations and Authorities (Glossary)

<b>MUP</b>	Ministry of Internal Affairs
<b>OA</b>	Operative Action
<b>OG</b>	Operational Group
<b>PJM</b>	Special Police Unit (public security) (synonymous with and used interchangeably in the evidence with the acronym “PJP”)
<b>RDB</b>	State Security Department
<b>RS</b>	Republika Srpska (also used as an acronym for the predecessor of Republika Srpska—the Republic of the Serbian People of Bosnia and Herzegovina)
<b>RS Assembly</b>	Assembly of the Serbian People in BiH
<b>RS-DB</b>	State Security Department of the RS-MUP (successor to SNB)
<b>RSK</b>	Republic of Serbian Krajina
<b>RSK-DB</b>	State Security Department of the RSK-MUP
<b>RSK-MUP</b>	Republic of Serbian Krajina Ministry of Internal Affairs
<b>RS-MUP</b>	Republika Srpska Ministry of Internal Affairs
<b>RS-SNB</b>	National Security Service of the RS-MUP (precursor to the RS-DB)
<b>SČP</b>	Serbian Chetnik Movement
<b>SAJ</b>	Special Anti-Terrorist Unit (public security)
<b>SAO</b>	Serbian Autonomous Region
<b>SAO-Krajina</b>	Serbian Autonomous Region of Krajina
<b>SAO-KrajinaDB</b>	State Security Service of the SAO-KrajinaMUP
<b>SAO-KrajinaMUP</b>	Ministry/Secretariat of Internal Affairs of SAO-Krajina
<b>SAO-SBWS</b>	Serbian Autonomous Region of Eastern Slavonia, Baranja and Western Srem
<b>SAO-SBWSMUP</b>	Ministry of Internal Affairs of SAO-SBWS
<b>SDA</b>	Party of Democratic Action
<b>SDG</b>	Serbian Volunteer Guard aka “ARKAN’s Tigers”, a paramilitary group led by Željko RAŽNATOVIĆ aka ARKAN
<b>SDK</b>	Public Auditing Service
<b>SDS</b>	Serbian Democratic Party
<b>SerbianDB</b>	State Security Service or Department of the SMUP. Note that this encompasses the State Security Service (SDB) and the State Security Department (RDB), names for the same organisation during different time periods.



List of Abbreviations and Authorities (Glossary)

<b>SerbianJB</b>	Public Security Department (or Service) of the SMUP
<b>SerbianJB-PJM</b>	Public Security Special Police Unit (SMUP)
<b>SerbianMOD</b>	Ministry of Defence of the Republic of Serbia
<b>SFRY</b>	Socialist Federal Republic of Yugoslavia
<b>SJB</b>	Public Security Station
<b>SMUP</b>	Ministry/Secretariat of Internal Affairs of the Republic of Serbia
<b>SNB</b>	Serbian National Security (unless otherwise indicated, this refers to the SNB in SBWS)
<b>SNC</b>	Serbian National Council
<b>SOS</b>	Serbian Defence Forces
<b>SPS</b>	Socialist Party of Serbia
<b>SRS</b>	Serbian Radical Party
<b>SSNO</b>	Federal Secretariat of National Defence (of the SFRY)
<b>SUP</b>	Secretariat of Internal Affairs (used in this Brief to refer to local and regional secretariats)
<b>SVK</b>	Army of RSK
<b>TG</b>	Tactical Group
<b>TO</b>	Territorial Defence
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>UNPROFOR</b>	United Nations Protection Force
<b>USDB</b>	State Security Service Administration
<b>VJ</b>	Army of the Federal Republic of Yugoslavia (came into existence after May 1992 when the JNA ceased to exist)
<b>VOPP</b>	Vance Owen Peace Plan
<b>VRS</b>	Army of Republika Srpska (came into existence after May 1992 when the JNA ceased to exist)
<b>ZNG</b>	Croatian National Guard

List of Abbreviations and Authorities (Glossary)

**Statutes and Rules of Procedure and Evidence**

Abbreviation used	Full citation
IRMCT Statute	Statute of the International Residual Mechanism for Criminal Tribunals established by the United Nations Security Council Resolution 1966, 22 December 2010
IRMCT Rule(s)	Rules of Procedure and Evidence, MICT/1/Rev.7, 4 December 2020
ICTY Statute	Statute of the International Criminal Tribunal for the Former Yugoslavia established by the United Nations Security Council Resolution 827, 25 May 1993

**MICT-15-96-T authorities**

Abbreviation used	Full citation
Indictment	<i>Prosecution Notice of Filing of Third Amended Indictment</i> , Case No.IT-03-69-PT, 10 July 2008
[REDACTED]	[REDACTED]
(Prosecution) Pre-Trial Brief	Prosecution Pre-Trial Brief, Case No. MICT-15-96-PT, 5 September 2016
[REDACTED]	[REDACTED]
<i>Serbia Camps Decision</i>	Decision on Prosecution Motion for Reconsideration and Further Submission, 11 February 2019
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
<i>Stanišić</i> Pre-Trial Brief	<i>Stanišić</i> Defence Pre-Trial Brief, Case No. MICT-15-96-PT, 7 November 2016

List of Abbreviations and Authorities (Glossary)

**MICT authorities**

Abbreviation used	Full citation
<i>Karadžić</i> AJ	<i>Prosecutor v. Radovan Karadžić</i> , Case No. MICT-13-55-A, App.Ch., Judgement, 20 March 2019
<i>Ngirabatware</i> AJ	<i>Prosecutor v. Augustin Ngirabatware</i> , Case No. MICT-12-29-A, App.Ch., Judgement, 18 December 2014

**ICTY authorities**

Abbreviation used	Full citation
<i>Aleksovski</i> AJ	<i>Prosecutor v. Zlatko Aleksovski</i> , Case No. IT-95-14/1-A, App.Ch., Judgement, 24 March 2000
<i>Blaškić</i> AJ	<i>Prosecutor v. Tihomir Blaškić</i> , Case No. IT-95-14-A, App.Ch., Judgement, 29 July 2004
<i>Brdanin</i> AJ	<i>Prosecutor v. Radoslav Brdanin</i> , Case No. IT-99-36-A, App.Ch., Judgement, 3 April 2007
<i>Čelebići</i> AJ	<i>Prosecutor v. Zejnil Delalić, Zdravko Mucić, a.k.a. “Pavo”, Hazim Delić &amp; Esad Landžo, a.k.a. “Zenga”</i> , Case No. IT-96-21-A, App.Ch., Judgement, 20 February 2001
<i>Đorđević</i> AJ	<i>Prosecutor v. Vlastimir Đorđević</i> , Case No. IT-05-87/1-A, App.Ch., Judgement, 27 January 2014
<i>Karadžić</i> JCE 3 Foreseeability AD	<i>Prosecutor v. Radovan Karadžić</i> , Case No. IT-95-5/18-AR72.4, App.Ch., Decision on Prosecution’s Motion Appealing Trial Chamber’s Decision on JCE III Foreseeability, 25 June 2009
<i>Kordić</i> AJ	<i>Prosecutor v. Dario Kordić &amp; 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>Krnjelac</i> AJ	<i>Prosecutor v. Milorad Krnjelac</i> , Case No. IT-97-25-A, App.Ch., Judgement, 17 September 2003
<i>Kunarac</i> AJ	<i>Prosecutor v. Dragoljub Kunarac, Radomir Kovač &amp; Zoran Vuković</i> , Case No. IT-96-23 & IT-96-23/1-A, App.Ch., Judgement, 12 June 2002

List of Abbreviations and Authorities (Glossary)

Abbreviation used	Full citation
<i>Kupreškić TJ</i>	<i>Prosecutor v. Zoran Kupreškić, Mirjan Kupreškić, Vlatko Kupreškić, Drago Josipović, Dragan Papić &amp; Vladimir Šantić, a.k.a. “Vlado”, Case No. IT-95-16-T, T.Ch., Judgement, 14 January 2000</i>
<i>Kvočka AJ</i>	<i>Prosecutor v. Miroslav Kvočka, Mlado Radić, Zoran Žigić &amp; Dragoljub Prcać, Case No. IT-98-30/1-A, App.Ch., Judgement, 28 February 2005</i>
<i>Martić AJ</i>	<i>Prosecutor v. Milan Martić, Case No. IT-95-11-A, App.Ch., Judgement, 8 October 2008</i>
<i>Milošević AJ</i>	<i>Prosecutor v. Dragomir Milošević, Case No. IT-98-29/1-A, App.Ch., Judgement, 12 November 2009</i>
<i>Milutinović TJ</i>	<i>Prosecutor v. Milan Milutinović, Nikola Šainović, Dragoljub Ojdanić, Nebojša Pavković, Vladimir Lazarević &amp; Sreten Lukić, Case No. IT-05-87-T, T.Ch., Judgement, 26 February 2009</i>
<i>Mladić TJ</i>	<i>Prosecutor v. Ratko Mladić, Case No. IT-09-92-T, T.Ch., Judgement, 22 November 2017</i>
<i>Mrkšić AJ</i>	<i>Prosecutor v. Mile Mrkšić &amp; Veselin Šljivančanin, Case No. IT-95-13/1-A, App.Ch., Judgement, 5 May 2009</i>
<i>Popović AJ</i>	<i>Prosecutor v. Vujadin Popović, Ljubiša Beara, Drago Nikolić, Ljubomir Borovčanin, Radivoje Miletić, Milan Gvero &amp; Vinko Pandurević, Case No. IT-05-88-A, App.Ch., Judgement, 30 January 2015</i>
<i>Popović TJ</i>	<i>Prosecutor v. Vujadin Popović, Ljubiša Beara, Drago Nikolić, Ljubomir Borovčanin, Radivoje Miletić, Milan Gvero &amp; Vinko Pandurević, Case No. IT-05-88-T, T.Ch., Judgement, 10 June 2010 (Public Redacted)</i>
<i>Prlić AJ</i>	<i>Prosecutor v. Jadranko Prlić, Bruno Stojić, Slobodan Praljak, Milivoj Petković, Valentin Ćorić &amp; Berislav Pušić, Case No. IT-04-74-A, App.Ch., Judgement, 29 November 2017</i>
<i>Šainović AJ</i>	<i>Prosecutor v. Nikola Šainović, Nebojša Pavković, Vladimir Lazarević &amp; Sreten Lukić, Case No. IT-05-87-A, App.Ch., Judgement, 23 January 2014</i>
<i>M.Simić SJ</i>	<i>Prosecutor v. Milan Simić, Case No. IT-95-9/2-S, T.Ch., Sentencing Judgement, 17 October 2002</i>
<i>Stakić AJ</i>	<i>Prosecutor v. Milomir Stakić, Case No. IT-97-24-A, App.Ch., Judgement, 22 March 2006</i>
<i>Stanišić &amp; Župljanin AJ</i>	<i>Prosecutor v. Mićo Stanišić &amp; Stojan Župljanin, Case No. IT-08-91-A, App.Ch., Judgement, 30 June 2016</i>
<i>Tadić AJ</i>	<i>Prosecutor v. Duško Tadić, Case No. IT-94-1-A, App.Ch., Judgement, 15 July 1999</i>

List of Abbreviations and Authorities (Glossary)

Abbreviation used	Full citation
<i>Tadić</i> Jurisdiction AD	<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> AJ	<i>Prosecutor v. Zdravko Tolimir</i> , Case No. IT-05-88/2-A, App.Ch., Judgement, 8 April 2015
<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>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> AJ	<i>François Karera v. Prosecutor</i> , Case No. ICTR-01-74-A, App.Ch., Judgement, 2 February 2009
<i>Kayishema</i> AJ	<i>Prosecutor v. Clément Kayishema &amp; Obed Ruzindana</i> , Case No. ICTR-95-1-A, App.Ch., Judgement (Reasons), 1 June 2001
<i>Nahimana</i> AJ	<i>Ferdinand Nahimana, Jean-Bosco Barayagwiza &amp; Hassan Ngeze v. Prosecutor</i> , Case No. ICTR-99-52-A, App.Ch., Judgement, 28 November 2007
<i>Nyiramasuhuko</i> AJ	<i>Prosecutor v. Pauline Nyiramasuhuko, Arsène Shalom Ntahobali, Sylvain Nsabimana, Alphonse Nteziryayo, Jospheh Kanyabashi &amp; Élie Ndayambaje</i> , Case No. ICTR-98-42-A, App.Ch., Judgement, 14 December 2015
<i>Renzaho</i> AJ	<i>Tharcisse Renzaho v. Prosecutor</i> , Case No. ICTR-97-31-A, App.Ch., Judgement, 1 April 2011
<i>Semanza</i> TJ	<i>Prosecutor v. Laurent Semanza</i> , Case No. ICTR-97-20-T, T.Ch., Judgement and Sentence, 15 May 2003

List of Abbreviations and Authorities (Glossary)

**General Sources**

<b>Abbreviations used in Prosecution Final Trial Brief</b>	<b>Full citation</b>
GCI	First Geneva Convention for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the Field, 12 August 1949, 75 U.N.T.S. 30 (entered into force 21 October 1950)
GCII	Second Geneva Convention for the Amelioration of the Conditions of Wounded, Sick and Shipwrecked Members of Armed Forces at Sea, 12 August 1949, 75 U.N.T.S. 84 (entered into force 21 October 1950)
GCIII	Third Geneva Convention Relative to the Treatment of Prisoners of War, 12 August 1949, 75 U.N.T.S. 134 (entered into force 21 October 1950)
GCIV	Fourth Geneva Convention Relative to the Protection of Civilian Persons in Time of War, 12 August 1949, 75 U.N.T.S. 286 (entered into force 21 October 1950)



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